

Responses in Writing to Resolution 31839

University of Washington Master Plan

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feet first

promoting walkable communities

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October 22, 2018

Seattle City Council
City Hall
600 Fourth Ave. 2nd Floor
Seattle, WA 98104

Dear City Councilmembers:

Feet First is Washington's only statewide nonprofit organization representing people of all ages looking for safe, accessible, and inviting ways to go by foot. Walking is a vital transportation mode that strengthens communities, reduces pollution, and promotes good health.

The Seattle City Council's Resolution 31839 is an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). We ask that the Council, in balancing the UW's institutional needs with equity and livability, consider additional changes to clarify and strengthen the CMP resolution.

First and foremost, we hold that Resolution 31839 fails to adequately mitigate the safety impacts of increased traffic on the Burke-Gilman Trail arising from the expansion of the UW campus. Trail use on campus is expected to triple by the year 2030, thereby increasing the potential for collisions at the many conflict points along the Burke-Gilman. Although there are plans to eventually widen and separate users on the remaining two unimproved sections of trail on campus, there is no firm commitment to complete these improvements in a timely manner. To mitigate these hazards, the UW must widen and separate users on these two unimproved sections of the trail by 2021.

Therefore, we call upon the city council to strike the word "Potential" from Potential Bicycle Improvement Strategies. Additionally, Strategy 6 should be amended to read "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan." It should also be amended to strike the term "as funding allows" and insert "by 2021."

Feet First also supports the full recommendations of the U District Alliance on housing, transportation, zoning, child care, priority hiring, small business and re-negotiating the City-University Agreement.

Sincerely,

James Davis,
Feet First Board of Directors

 [@FeetFirst_WA](https://twitter.com/FeetFirst_WA)

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LOCAL 925



SEIU
Stronger Together

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October 22, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: SEIU Local 925 Comments on UW CMP - October 2018

Dear Mr. Whitson,

SEIU Local 925 and our allies in The U District Alliance for Equity and Livability (UDAEL)¹ view the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). We ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit, based on student living arrangements. This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to 944 total affordable units (622 @ 80% AMI and 322 @ 50% AMI) to ensure that UW employees with the

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greatest housing cost burdens will not have to disrupt their current household size to qualify for affordable housing.²

2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.
3. To set an intermediate goal for the UW of producing 450 housing units by 2023.
4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
6. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
7. The housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.
8. That UW contribute more than just land to the effort. They should actually provide the housing.

Transportation

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, we believe the UW should be required to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones** – neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.
3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without

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the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.

4. Bike Parking: Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."
5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPASS's to a majority (but not all) union-represented staff, more than half of UW employees will not receive an employer-paid UPASS in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

Zoning – the Alliance supports CUCAC's position on height limits for two UW parcels (W22 and W37) at the north end of the University Bridge.

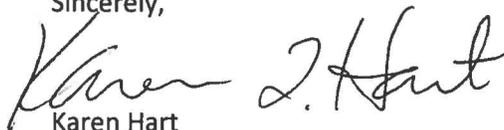
Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

"Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year."

SEIU Local 925 looks forward to further Council discussion of these conditions and would welcome the opportunity to answer questions and provide more information at a future Committee or Council meeting.

Sincerely,



Karen Hart
President
SEIU Local 925

Comments on UW Master Plan from Coalition of Immigrants, Refugees and Communities of Color (CIRCC)

The Coalition of Immigrants, Refugees and Communities of Color (CIRCC) brings together representatives from many of Seattle's recent immigrant communities as well as historic Seattle communities of color. CIRCC is dedicated to building informed, engaged, and equitable communities.

CIRCC has reviewed the Seattle City Council's Resolution 31839 on proposed conditions to the University of Washington's (UW) Campus Master Plan (CMP). While the resolution is a step forward, we ask the Council to strengthen the proposed conditions to mitigate more of the major impacts the proposed expansion will have on our communities. +

Affordable Housing

We believe the UW should do far more to reduce the impacts of more expensive housing costs on immigrant workers from our communities, and to allow them to continue to live within a reasonable commuting distance of the UW.

We call on the Council to require the UW to build at least 1,000 units of affordable housing of various sizes for our families who work at the UW. It is not an equitable solution to require workers to live together in order to have affordable housing. The UW should not be treating its employees like coal miners by requiring them to live in dormitory units with other workers.

The UW should also be required to provide childcare onsite for housing. The City should set an intermediate goal for the UW of producing 450 housing units by 2023. We ask that half of the units be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.

We ask that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered. The UW is used to housing mostly undergraduate students, and should get input from employees on these issues.

Because the Council is planning to exempt the UW commercial leasing from the MHA, we ask that the housing be non-profit or publicly owned so rents are affordable forever. The UW contributes more than just discounted land to the effort. They should actually provide the housing.

Transportation

CIRCC supports the conditioning of the CMP to increase the pressure on the UW to provide transit passes to all workers, not just represented workers. We support the transportation recommendations of the U District Alliance, including keeping the requirement for achieving a 12% SOV rate by 2024, as recommended by the Hearing Examiner. In addition, a large

percentage of our members can't access the light rail directly, so tying the 12% SOV goal to the light rail extension is irrelevant for many UW employees.

We ask that the City continue to pressure the UW to act to provide affordable child care for its lower wage employees. The City can't say early education is a priority and not take action to move large public employers towards providing affordable care.

We have direct experience with the UW as an institution with a terrible record of hiring immigrant workers and workers of color for jobs other than lower-paid jobs in the hospital. The Council needs to pass a strong resolution on the UW and Priority Hire, and using local and Minority/Women-owned businesses.

Thank you for your consideration.

Bereket Kiros for CIRCC

October 23, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: Emily Sharp Comments on UW CMP - October 2018

Dear Mr. Whitson,

As an employee of the University of Washington and part of The U District Alliance for Equity and Livability (UDAEL)¹, I view the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). I ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

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The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit, based on student living arrangements. This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

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² The UW EIS (3.8-27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
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3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
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Sincerely,

Emily Sharp
Physical Therapist
UW Medical Center

October 23, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: Shawn Williams Comments on UW CMP - October 2018

Dear Mr. Whitson,

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Sincerely,

Shawn Williams
Fiscal Specialist
University of Washington

October 23, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: WFSE Local 1488 Comments on UW CMP - October 2018

Dear Mr. Whitson,

WFSE Local 1488 and our allies in The U District Alliance for Equity and Livability (UDAEL)¹, view the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). We ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

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8. That UW contribute more than just land to the effort. They should actually provide the housing.

Transportation

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, we believe the UW should be required to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones –** neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.
3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
4. **Bike Parking:** Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."

5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPASS's to a majority (but not all) union-represented staff, more than half of UW employees will not receive an employer-paid UPASS in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

Zoning – the Alliance supports CUCAC's position on height limits for two UW parcels (W22 and W37) at the north end of the University Bridge.

Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

“Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year.”

WFSE Local 1488 looks forward to further Council discussion of these conditions and would welcome the opportunity to answer questions and provide more information at a future Committee or Council meeting.

Sincerely,

Paula Lukaszek
President
Washington Federation of State Employees, Local 1488

October 23, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: Kent Jewell Comments on UW CMP - October 2018

Dear Mr. Whitson,

As a longtime employee (22 years, as well as being an alumnus) of the University of Washington, year-round bicycle commuter and advocate, and part of The U District Alliance for Equity and Livability (UDAEL)¹, I view the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). I ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit, based on student living arrangements. This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to 944 total affordable units (622 @ 80% AMI and 322 @ 50% AMI) to ensure that UW employees with the greatest housing cost burdens will not have to disrupt their current household size to qualify for affordable housing.²
2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.

¹ U District Alliance for Equity and Livability - Amer. Assoc. of Univ. Professors (AAUP)-UW Chapter, Beacon Hill United Methodist Church, Church Council of Greater Seattle, Coalition of Immigrants, Refugees and Communities of Color (CIRCC), Eritrean Association in Greater Seattle, Feet First, Laborers Local 242, Low Income Housing Institute (LIHI), M. L. King County Labor Council, Puget Sound Sage, Roosevelt Neighborhood Association, Seattle Building Trades Council, Seattle Human Services Coalition, SEIU Local 925, SEIU 6, SEIU Health Care 1199NW, Sierra Club, Teamsters Local 117, Transit Riders Union, United Students Against Sweatshops, UAW Local 4121 (Grad Students), Univ. District Community Council, UNITE HERE (Hotel) Local 8, UW Faculty Forward, UW Young Democrats, Wallingford Community Council, WA Community Action Network, WA Federation of State Employees Local 1488, WA State Nurses Association

² The UW EIS (3.8-27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

3. To set an intermediate goal for the UW of producing 450 housing units by 2023.
4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
6. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
7. The housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.
8. That UW contribute more than just land to the effort. They should actually provide the housing.

Transportation

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, we believe the UW should be required to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones –** neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.
3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
4. **Bike Parking:** Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."

5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPASS's to a majority (but not all) union-represented staff, more than half of UW employees will not receive an employer-paid UPASS in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

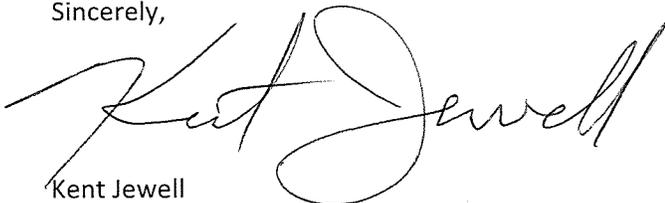
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Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

"Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year."

Sincerely,



Kent Jewell
Program Support Supervisor II
UW College of Education

Comments on Seattle City Council's Resolution 31839 regarding UW CMP

The City council's conditions on the University CMP are an important first step towards mitigating the significant impacts of the Plan. I ask that the Council, in balancing the UW's institutional needs with those of the employees and neighborhoods, consider strengthening their existing conditions in the following ways:

Finish mode separating the UW sections Burke Gilman Trail

The Burke Gilman trail is a critical component in Seattle's mobility infrastructure and its completion must be conditioned in the UW Master plan separate from any building site. It also needs more specifics including a finish-by date. Conditioning should include language specifying that the trail be widened and the "mode separation features installed along the new section on NE Pacific Street" be extended to the entire UW portion of the trail from under the 45th street viaduct all the way west to the section under I-5 by 2024.

Lower the Parking Cap

I support lowering the UW Parking Cap to 9,000 and including ALL UW campus parking spaces in the cap (loop in the UW Tower parking structures 750 currently uncounted spaces) This is plenty of parking given all the recent changes to the parking system that support better concurrency.

Set the combined SOV rate to 12 %

I support the 12% SOV rate specified by the City Council and deemed meritorious by the Hearing Examiner. This makes sense and should be the new conditioned target.

The City council is right to condition the University on these key points and must retain and strengthen the language for all of the following:

- 1) Condition specifically that the **Burke-Gilman trail be widened and the "mode separation features installed along the new section on NE Pacific Street" be extended to the entire UW portion of the trail from under the 45th street viaduct all the way west to the section under I-5 by 2024.**

- 2) Condition reducing the Parking Cap from 12,500 to 9000 spots, **The new 9000 parking spot target must include the 750 units in the UW Tower as well as the Residence Halls.**
- 3) **Retain** the Conditioning of the **UW Combined SOV rate to 12% to align with the Seattle Comprehensive plan goals.**
- 4) **Condition the full recommendations of the U District Alliance on housing, zoning, child care, priority hiring, small business, transportation, and re-negotiating the City-University Agreement.**

Matt Weatherford

University of Washington Class of 1992

University Transportation Committee, PSO Representative 2004 - present

University of Washington Professional Staff Organization Board Member 2016 - present

October 23, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: Tom Small Comments on UW CMP - October 2018

Dear Mr. Whitson,

As an employee of the University of Washington and part of The U District Alliance for Equity and Livability (UDAEL)¹, I view the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). I ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit, based on student living arrangements. This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to 944 total affordable units (622 @ 80% AMI and 322 @ 50% AMI) to ensure that UW employees with the greatest housing cost burdens will not have to disrupt their current household size to qualify for affordable housing.²
2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.
3. To set an intermediate goal for the UW of producing 450 housing units by 2023.

¹ U District Alliance for Equity and Livability - Amer. Assoc. of Univ. Professors (AAUP)-UW Chapter, Beacon Hill United Methodist Church, Church Council of Greater Seattle, Coalition of Immigrants, Refugees and Communities of Color (CIRCC), Eritrean Association in Greater Seattle, Feet First, Laborers Local 242, Low Income Housing Institute (LIHI), M. L. King County Labor Council, Puget Sound Sage, Roosevelt Neighborhood Association, Seattle Building Trades Council, Seattle Human Services Coalition, SEIU Local 925, SEIU 6, SEIU Health Care 1199NW, Sierra Club, Teamsters Local 117, Transit Riders Union, United Students Against Sweatshops, UAW Local 4121 (Grad Students), Univ. District Community Council, UNITE HERE (Hotel) Local 8, UW Faculty Forward, UW Young Democrats, Wallingford Community Council, WA Community Action Network, WA Federation of State Employees Local 1488, WA State Nurses Association

² The UW EIS (3.8-27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
6. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
7. The housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.
8. That UW contribute more than just land to the effort. They should actually provide the housing.

Transportation

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, we believe the UW should be required to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones** – neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.
3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
4. **Bike Parking:** Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."

5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPASS's to a majority (but not all) union-represented staff, more than half of UW employees will not receive an employer-paid UPASS in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

Zoning – the Alliance supports CUCAC's position on height limits for two UW parcels (W22 and W37) at the north end of the University Bridge.

Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

“Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year.”

Sincerely,

Tom Small
Medical Laboratory Scientist 2
UW Medical Center

Transit Riders Union Comments on the UW CMP – October 2018

First and foremost, the Transit Riders Union (TRU) strongly supports keeping the requirement that the UW reduce its single-occupancy vehicle (SOV) rate to 12 percent by 2014, following the recommendation of the Hearing Examiner.

The UW's claims that it already has a low drive-alone rate and that 12% is unreasonable are extremely misleading. The 12% target includes students, which fundamentally changes the nature of the metric. The UW's current drive-alone rate for employees is around 34%, which is not much better than the 2017 Seattle CTR target for University District employers. The 2017 drive-alone rate for downtown Seattle was around 25%. In 2015, Seattle Children's Hospital had a lower employee drive-alone rate and a higher transit commute rate than the UW.

Seattle's 2035 Comprehensive Plan establishes an employee drive-alone target of 15% for the University District. Because so many students live in or near campus, the UW can easily meet a 12% combined student-employee target without even meeting this 15% target for employees. The UW's huge footprint and impending major expansion warrant higher standards, as the U-District is already a heavily congested area of the city.

While the UW has now committed to providing UPasses to many represented staff, more than half of UW will not receive an employer-paid UPass in the foreseeable future without a firm deadline on the UW to achieve the 12% goal.

Secondly, TRU strongly supports increasing the housing requirement from 450 to 944 total affordable units, to match the increase in projected employee households earning less than 80% AMI. It is extremely unrealistic to assume that these 900+ employees will "double up" in 450 units. Raising the housing requirement to the appropriate level will ensure that UW employees with the greatest housing cost burdens can live near campus. It will also help the UW to achieve the 12% SOV rate by stabilizing the number of employees who must undertake long commutes from lower-cost neighborhoods, often far outside Seattle in areas without reliable access to public transit. TRU supports the detailed recommendations of the U District Alliance on strengthening the housing requirement, including setting intermediate time goals for getting this housing online, with consequences for not meeting these benchmarks.

TRU also supports reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. We support the full recommendations of the U District Alliance on housing, transportation, zoning, child care, priority hiring, small business and re-negotiating the Clty-University Agreement.



Improving Lives Through Bicycling

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[f /CascadeBicycleClub](#) [t @cascadebicycle](#) [i @cascadebicycle](#)

To: Seattle City Council
From: Cascade Bicycle Club
Date: October 25, 2018

RE: Comments on Seattle City Council's Resolution 31839, regarding the Preliminary Decision on the University of Washington Campus Master Plan

Cascade Bicycle Club (Cascade) takes this opportunity to respond to City Council's Resolution 31839, dated September 24, 2018. Cascade asks the Seattle City Council to approve the proposed 2018 Campus Master Plan with the following updates to the amendments to adequately mitigate the shortcomings that we, and others, have identified in their proposal.

1. Burke-Gilman Trail Improvements:

Cascade is pleased that the UW commits to upgrading the trail to accommodate active transportation, but notes that the UW still fails to identify a specific timeline (year) or funding mechanism. There are specific adverse impacts on the Burke-Gilman Trail identified in the UW's own analysis, including that under all development scenarios the segment of the Burke-Gilman trail that is currently unseparated will drop to LOS level F, yet the City Council Amendment only states that it will *"require trail widening when development adjacent to the trail occurs."* It is our interpretation of the University's commitment to mitigate associated traffic impacts that the University ought to attach specific and timely dates for completion of Burke-Gilman Trail Improvements, rather than awaiting opportunity as funding or development occurs.

People walking, biking, and riding scooters (or using other emerging modes for micro-mobility) on campus are expected to triple trail use by the year 2030, thereby increasing the potential for collisions at existing conflict points along the Burke-Gilman. Given the already-significant safety concerns along the Burke-Gilman Trail as noted in the University's own "Bicycle and Pedestrian Collision Report (2015)", the crash "hotspots" along the Burke-Gilman Trail and at the intersection of Pend Oreille warrant timely action. Existing safety concerns, projected growth in modes and number of users may exacerbate shortcomings with the existing infrastructure and offer another reason to modernize segments of the UW's portion of the Burke-Gilman Trail.

Cascade is supportive of separation of users on the Burke-Gilman Trail, as both City Council and the University have stipulated, and would also be supportive of separate pathways (per the most recent City Council Amendment). However, we continue to urge commitment to a timeline independent of the development status of adjacent properties, given the UW's requirement (per the City/University Agreement) to identify measures to

mitigate traffic impacts (stipulated in Section IIIB1c Traffic of the City/University Agreement in).

2. Bicycle Mode-Share Goal:

The City/University Agreement stipulates in Section II Ac3f *"The transportation Plan will include specific programs to reduce traffic impacts and encourage the use of Public Transportation and other alternatives to SOV including biking"*. Identifying a mode share growth target for bicycling that is related to, and contributes to, the achievement of the UW's reductive mode share goal of single occupancy vehicle (SOV) trips (regardless of whether that goal remains at 15% or is reduced to 12%) is recommended by Cascade and many other petitioners. The Final Environmental Impact Statement (FEIS) discusses a 10% bicycle mode share by 2028 – just a 1% increase over 12 years. A 1% growth in bicycling would see the UW go from having an above average bike mode share to one lower than the city's overall goal, and our recommendation would be to formalize commitments to grow bicycling mode-share over time, particularly as the SOV rate decreases. Including a formal bicycle mode-share in the Master Plan guarantees that the UW will move forward with implementing programs needed to achieve the overall non-SOV mode share target.

3. Bicycle Parking Plan:

While we are supportive of the City Council's inclusion of *"showers, lighting, and lockers as additional facilities...consistent with current University practice"* in their recent amendment and the UW's acknowledgement of these facilities as part of their existing best practices, we continue to urge measurable targets for bike parking via a formal bicycle parking plan. The City/University Agreement stipulates in Section IIIC3 *"Adequate bike parking, including secure racks and lockers will be provided in safe, convenient locations on campus"*. A formal bicycle parking plan will ensure that as campus grows, bicycle parking capacity will grow in accordance with geographic demand rather than by overall capacity. This is essential to both growing bicycle mode share and maintaining it: even if bicycle mode share remains stagnant, as the institution grows, net bicycle trips will also grow and necessitate additional parking that is convenient, secure, and available for users when and where they need it.

4. SOV Mode Share Goal:

We were pleased to see City Council's amendment urging the University to *"reduce the goal for the share of trips to campus made by single-occupancy vehicle from 15% in 2028 to 12% and set interim thresholds tied to the opening of light rail stations."* As referenced above, the City/University Agreement stipulates in Section IIIB1c Traffic *"The new master planning process will analyze and plan for any development necessary to accommodate additional students, staff and faculty and identify measures to mitigate associated traffic impacts"* and, in Section II Ac3f *"The transportation Plan will include specific programs to reduce traffic impacts and encourage the use of Public Transportation and other alternatives to SOV including biking"*.

The additional trips from campus growth projected in the FEIS predict significant transportation impacts that are not mitigated by the UW's proposed 15% SOV goal. For example, 11 out of 13 University District intersections would reach LOS E or F by 2028, with a 5-fold increase in delay. And, in 6 out of 7 transit corridors the delay would be, on average, 21%. Therefore, we, along with many other community stakeholders recommend an SOV mode share goal of 12%, in order to truly mitigate the impacts of campus growth. Cascade recommends that City Council hold fast to their amendment to hold the University to 12% modeshare by SOV in 2028.

Filed on behalf of Cascade Bicycle Club, this 25 day of October.

A handwritten signature in black ink, appearing to read 'Richard Smith', with a long horizontal stroke extending to the right.

By:

Richard Smith

Executive Director

Cascade Bicycle Club

U District Alliance Proposed Comments on UW CMP - October 2018

The U District Alliance for Equity and Livability (UDAEL) (see list on p.3) views the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). We ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the MHA requirements when it leases or "creates partnerships" that involve commercial space.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit, based on student living arrangements.¹ This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to 944 total affordable units (622 @ 80% AMI and 322 @ 50% AMI) to ensure that UW employees with the greatest housing cost burdens will not have to disrupt their current households or live together to qualify for affordable housing.
2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.
3. The City should link affordable housing production goals to campus expansion benchmarks. For transportation, the City Council adopts a staged reduction of SOV rates, starting at 17% and decreasing to 12% by 2028 (Amendment 28 to the Master Plan). In addition, Council requires additional transit measures if the University fails to meet these goals. The same staged approach should be applied to affordable housing creation. The Resolution only requires the full amount of housing be built by the time the University has exhausted the full 6 million square feet of expansion – which may or may not happen in a 10 year period. Under this requirement, it is possible that the University could wait to fulfill this requirement for more than 10 years, as long as the 6 million sf milestone has not full occurred. Instead, the Council should require 1/3rd of the housing be built at 2 million sf, another 1/3rd at 4 million sf, and the final 1/3rd 2 million sf at 6 million sf. This is consistent with other housing requirements the Council has made on master planned projects in the past. Finally, the Council should cease issuing further master use or building permits until the respective benchmarks are achieved.

¹ The UW EIS (3.8-27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
6. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
7. The housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.
8. That UW contribute more than just discounted long-term ground leases to the effort. They should actually provide the housing.
9. To address the problem of homeless UW students, the UW needs to create 75 units of housing for homeless students and 75 units of housing for homeless young adults living in the U District, and provide low-cost commercial space for social service organizations serving homeless students and young adults, including the Urban Rest Stop and Roots.

Transportation

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, require the UW to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones** – neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.

3. Bicycle/Pedestrian Improvements: Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
4. Bike Parking: Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."
5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPasses to represented staff, more than half of UW will not receive an employer-paid UPass in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

Zoning – the Alliance supports CUCAC's position on height limits for two UW parcels (W22 and W37) at the north end of the University Bridge.

Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

“Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year.”

The Alliance looks forward to further Council discussion of these conditions and would welcome the opportunity to answer questions and provide more information at a future Committee or Council meeting.

Submitted by David West

On behalf of the U District Alliance

October 23, 2018

U District Alliance for Equity and Livability - Amer. Assoc. of Univ. Professors (AAUP)-UW Chapter, Beacon Hill United Methodist Church, Church Council of Greater Seattle, Coalition of Immigrants, Refugees and Communities of Color (CIRCC), Eritrean Association in Greater Seattle, Feet First, Laborers Local 242, Low Income Housing Institute (LIHI), M. L. King County Labor Council, Puget Sound Sage, Roosevelt Neighborhood Association, Seattle Building Trades Council, Seattle Human Services Coalition, SEIU Local 925, SEIU 6, SEIU Health Care 1199NW, Sierra Club, Teamsters Local 117, Transit Riders Union, United Students Against Sweatshops, UAW Local 4121 (Grad Students), Univ. District Community Council, UNITE HERE (Hotel) Local 8, UW Faculty Forward, UW Young Democrats, Wallingford Community Council, WA Community Action Network, WA Federation of State Employees Local 1488, WA State Nurses Association



MEMBERS

Timmy Bendis
Eastlake Community Council

Douglas Campbell
University District Partnership

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Tomitha Blake
Montlake Community Club

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Portage Bay/Roanoke Park Community Council

TBD
Ravenna Springs Community Group

Sarah Swanberg
Ravenna Bryant Community Assoc.

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Roosevelt Neighbors Alliance

Amanda Winters
Roosevelt Neighbors Association

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Barbara Quinn
University Park Community Council

Brian O'Sullivan
Wallingford Community Council

Kerry Kahl
University of Washington At -Large

TBD
University of Washington Students

Ashley Emery
University of Washington Faculty

Julie Blakeslee
University of Washington Staff

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Louise Little
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Colleen McAleer
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Miha Sarani
Montlake Community Club

Barbara Krieger
Portage Bay/Roanoke Park Community Council

TBD
Ravenna Springs Community Group

Jorgen Bader
Ravenna Bryant Community Assoc.

TBD
Roosevelt Neighbors Alliance

TBD
Roosevelt Neighbors Association

Jorgen Bader
University District Community Council

Ruedi Rislser
University Park Community Club

Jon Berkedal
Wallingford Community Council

TBD
University of Washington At -Large

TBD
University of Washington Students

Rick Mohler
University of Washington Faculty

TBD
University of Washington Staff

Ex-Officio

Maureen Sheehan – DON
City of Seattle, Dept. of Neighborhoods

Sally Clark – UW
University of Washington, Office of Regional Affairs

October 26, 2018

Lish Whitson
Seattle City Council, Central Staff
via e-mail: Lish.Whitson@seattle.gov

Dear Mr. Whitson,

The City University Community Advisory Committee (CUCAC) appreciates the opportunity to review the Seattle City Council Preliminary Decision on the University of Washington 2018 Seattle Campus Master Plan (CMP). CUCAC is made up of community council representatives and neighbors of the University District who care deeply about the University and surrounding neighborhoods. The following are comments on the Preliminary Decision we strongly believe City Council needs to take a closer look at or we want to show our support for.

DEVELOPMENT SITE 37W

We appreciate the Council reducing the height limit at W22. We continue to request – in the strongest possible terms – that the Council reconsider its decision to not adopt Councilmember Herbold's proposed amendment that would retain the current 65' zoned height at Site 37W, rather than adopting the University of Washington's proposal to double it to 130'.

As we noted in our comments to the City of Seattle Hearing Examiner as well as during testimony to the City Council, the proposed height increase at Site 37W is simply inconsistent with the adjacent zoning. This site is located across a narrow street from the Shoreline Overlay Zone to the south, which is limited to 30'/37' heights. In addition, the vast majority of Site 37W directly abuts Midrise Zoning with a 65' height limit to the north. Both of these facts are readily available in the CMP and are also clearly documented on page 11 of the Council's 7/18/18 briefing document. The proposal to increase the height at this location to 130' flies in the face of City policies that encourage transitions between zones, and this alone should have resulted in SDCI rejecting this proposed height increase. The Council must correct this error.

In addition, CUCAC has documented the extent to which doubling the height of this site will forever eliminate a significant view corridor the public now enjoys at the north end of the University Bridge from both sides of the street (please refer to the photos provided in our comments to the City Council for a visual representation of the extent to which these views will be blocked.) As we previously noted, SDCI's assertion that the obstruction of these views can somehow be mitigated is simply not accurate – the effect of doubling the height of the current building is not something that can be designed around or wished away.

If CUCAC is to have a meaningful role in this process, it ought to reasonably be able to expect that high-priority recommendations regarding a highly visible site near the campus boundary such as 37W will be taken seriously - both by unelected bureaucrats as well as elected officials. We were sorely disappointed in the Council's failure to adopt Councilmember Herbold's amendment that would have incorporated CUCAC's input into this process, and sincerely hope that our strong support for the

existing height limit at this location will be reflected in the Council's final recommendations.

AMENDMENT #1 & 2 – AFFORDABLE HOUSING UNITS

CUCAC applauds City Council's increase in the number of affordable housing units required near the University campus.

AMENDMENT #28 & 32 – TMP SOV RATE GOAL

An incremental reduction in SOV rate goal is of great importance to CUCAC, and City Council's thoughtful attention to this is very much appreciated.

We urge the City Council to follow CUCAC recommendations #21 and 22 which reduce the target percentage for single occupancy vehicle trips to the University over the coming years. The University has done a superb job in reducing SOV trips to 18%, and the presently proposed further reduction to 15% is too conservative. The trip reduction to 18% was achieved in 2014, that is before light rail reached Husky Stadium. The University should be more aggressive and reduce the SOV rate to 12% instead of the proposed 15%. This required rate target should be phased in concurrently with the expansion of light rail service to the north and other transit improvements.

One way to achieve this lower number would be an expansion of the existing U Pass program. While the UW was a leader with this program when it was first introduced, other employers have since been much more progressive with transportation benefits for their employees.

The University as the biggest player in the U District should take the lead in transportation improvements by setting an example for other employers, and by negotiating proactive deals with the appropriate transportation agencies. Please include CUCAC's recommendations, which will improve the U District for everybody, including the University itself.

Thank you for the opportunity to review the documents. We look forward to working with the University to create an effective and useful tool for both the University and the neighboring communities.

Sincerely,



Matt Fox (Co-chair)



John Gaines (Co-chair)

cc: Sally Clark, University of Washington



October 24, 2018

Lish Whitson
City of Seattle Council Central Staff
lish.whitson@seattle.gov

RE: SEIU6 Comments on UW CMP - October 2018

Dear Mr. Whitson,

SEIU6 Property Services NW and our allies in The U District Alliance for Equity and Livability (UDAEL)¹, view the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). We ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

SERGIO SALINAS
President

ZENIA JAVALERA
Secretary-Treasurer

JORGE DUEÑAS
Vice President

ERNA HANKIC
Vice President

CHARLES PANNELL
Emeritus

Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up

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¹ U District Alliance for Equity and Livability - Amer. Assoc. of Univ. Professors (AAUP)-UW Chapter, Beacon Hill United Methodist Church, Church Council of Greater Seattle, Coalition of Immigrants, Refugees and Communities of Color (CIRCC), Eritrean Association in Greater Seattle, Feet First, Laborers Local 242, Low Income Housing Institute (LIHI), M. L. King County Labor Council, Puget Sound Sage, Roosevelt Neighborhood Association, Seattle Building Trades Council, Seattle Human Services Coalition, SEIU Local 925, SEIU 6, SEIU Health Care 1199NW, Sierra Club, Teamsters Local 117, Transit Riders Union, United Students Against Sweatshops, UAW Local 4121 (Grad Students), Univ. District Community Council, UNITE HERE (Hotel) Local 8, UW Faculty Forward, UW Young Democrats, Wallingford Community Council, WA Community Action Network, WA Federation of State Employees Local 1488, WA State Nurses Association



in each unit, based on student living arrangements. This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to 944 total affordable units (622 @ 80% AMI and 322 @ 50% AMI) to ensure that UW employees with the greatest housing cost burdens will not have to disrupt their current household size to qualify for affordable housing.²
2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.
3. To set an intermediate goal for the UW of producing 450 housing units by 2023.
4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
6. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
7. The housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.
8. That UW contribute more than just land to the effort. They should actually provide the housing.

Transportation

² The UW EIS (3.8-27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus.

The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, we believe the UW should be required to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones –** neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.
3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
4. **Bike Parking:** Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."
5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPASS's to a majority (but not all) union-represented staff, more than half of UW employees will not receive an employer-paid UPASS in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and

future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

Zoning – the Alliance supports CUCAC’s position on height limits for two UW parcels (W22 and W37) at the north end of the University Bridge.

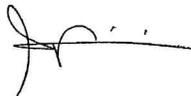
Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

“Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year.”

SEIU6 looks forward to further Council discussion of these conditions and would welcome the opportunity to answer questions and provide more information at a future Committee or Council meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sergio Salinas', with a long horizontal flourish extending to the right.

Sergio Salinas
President
SEIU6 Property Services NW



Response to City to Seattle Council Resolution 31839

Preliminary decision on the University of Washington 2018 Seattle Campus Master Plan

Puget Sound Sage

October 25, 2018

Puget Sound Sage is a member of the U District Alliance for Equity and Livability (the Alliance) and long-time advocate for equitable development and inclusionary housing in Seattle.

We appreciate that Council Resolution 31839 increases the University of Washington's requirement to creating affordable housing from 150 units to 450, but it does not adequately address the impact of the proposed master plan.

In Resolution 31839, Attachment 1, City Council acknowledges the increased demand for low-income housing (less than 80% AMI) that will result from the proposed expansion of the University. Under Item 67, in *Areas of Dispute*, the Council states "Generally, increased housing demand has the potential to displace low-income households, which find it difficult to compete in an increasingly competitive housing market." We concur and appreciate this finding.

Council further states, in Item 71, that "current and anticipated City regulations will not fully mitigate the affordable housing impact of anticipated growth." We also concur. Not only are City regulations inadequate to keeping up with demand for affordable housing generated by new employment, they are doubly inadequate for preventing displacement of low-income households from gentrifying neighborhoods, who are generally pushed out long before new units are built.

In Attachment 1, Item 14 under *Conclusions*, the Council also finds that the City has the authority to require the University to construct affordable housing in order to be consistent with Policy H.19 of the Comprehensive Plan. In item 15, the Council reiterates calculations the Alliance did for the Hearing Examiner regarding the number of new employees required for the University's expansion by income level: 944 earning less than 80% AMI, with 322 of those earning less than 50% AMI.

Finally, in Item 16, the Council finds that "requiring development of housing for low-income and very-low income staff on or near the campus will mitigate transportation and housing impacts caused by the University's growth permitted by this plan." The City acknowledges here a link between housing and transportation impacts, e.g., housing built close to campus or transit can reduce congestion impacts.

Given these findings, we conclude that the proposed amendment increasing the number of required units of affordable housing to 450 is inadequate. To be consistent with the Council's findings, we propose the following changes.

1. New, lower-wage employees hired by the University will require at least 900 new units of housing, not 450. Employment growth results in formation of new households which need a place to live. Those households can consist of single persons, roommates or families. Requiring only 450 units, to house 944 employees, appears to assume that new households will consist of

two University employees each – an assumption that works fine for students, but not for workers who may have family or existing roommates that are not University employees. The City condition for affordable housing mitigation should not implicitly require that University employees live with each other. For this reason, the City should require units equal to the projected number of new employees below 80% AMI, or 944 units – with 322 units at below 60% AMI.

2. The City should link affordable housing production goals to campus expansion benchmarks. For transportation, the City Council adopts a staged reduction of SOV rates, starting at 17% and decreasing to 12% by 2028 (Amendment 28 to the Campus Master Plan). In addition, Council requires additional transit measures if the University fails to meet these goals. The same staged approach should be applied to affordable housing creation. The Resolution only requires the full amount of housing be built by the time the University has exhausted the full 6 million square feet of expansion – which may or may not happen in a 10-year period. Under this condition, it is possible that the University could wait to fulfill this requirement for more than 10 years, as long as the 6 million sf milestone has not full occurred. Instead, the Council should require 1/3rd of the housing be built at 2 million sf, another 1/3rd at 4 million sf, and the final 1/3rd 2 million sf at 6 million sf of campus expansion. This is consistent with other housing requirements the Council has made on master planned projects in the past. Finally, the Council should cease issuing further master use or building permits if the respective benchmarks are not achieved.
3. The City should require that the 50% of the affordable units be located within walking distance of campus or within 45 a minute ride by public transit. This requirement will achieve both the City's goals for meeting affordable housing demand and reducing SOV use, a link the Council explicitly has made in the findings.
4. To achieve long-term jobs-housing balance and reduction of SOV use, the City should require that the new units be held affordable in perpetuity. The City makes generally makes explicit the tenure of affordability in other housing policy and conditions of development, and should do so here has well. Lack of specificity could result in affordable units reverting to market rate units in a relatively short period of time. For example, housing created with the Multi-Family Housing Tax Exemption program, which has a maximum 12 year-tenure, should not count towards the 944 units.
5. The University should also convene a non-oversight, housing agency stakeholder meeting that includes impacted students, University employees, and impacted communities. As with the Council's requirement that the University convene a transportation agency stakeholder meeting, both the City and University will benefit from ongoing participation and engagement on progress made towards required units.

If not otherwise specified in our proposed changes above, we also support the full recommendations of the U District Alliance on housing, transportation, zoning, child care, priority hiring, small business and re-negotiating the City-University Agreement, which will be submitted in concurrence with Sage's recommendations.



UNIVERSITY OF WASHINGTON
BOARD OF REGENTS

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October 26, 2018

Councilmember Johnson
Seattle City Council
Chair, Planning, Land Use, and Zoning Committee

c/o Lish Whitson
Legislative Analyst
Seattle City Council Central Staff
(via email to lish.whitson@seattle.gov)

Dear Councilmember Johnson,

Thank you for your continued work on the approval process for the University of Washington's proposed 2018 Campus Master Plan (the "Plan"). Pursuant to the City-University Agreement, the University of Washington Board of Regents submits this letter response to Resolution 31839, the City Council's "Preliminary Decision" on the Plan.

At the Board of Regents' (the "Regents") October 11, 2018 meeting, the Regents voted to approve a proposed response recommended by University Administration Staff, and delegated to me the authority to finalize the response in consultation with the University President and legal counsel. This letter constitutes the Regents final response.

As directed by the City-University Agreement ("CUA"), this letter sets out specific objections to the Preliminary Decision, the Regents' basis for them, and reasonable alternatives. The Regents concur with the majority of the Preliminary Decision and accept the majority of the more than 70 conditions on the Plan proposed throughout this process by the City-University Community Advisory Committee ("CUCAC"), the Seattle Department of Construction and Inspections ("SDCI"), the Hearing Examiner, and the City Council.

Although the Regents will accept almost all of the conditions proposed, there are a few areas of remaining disagreement. To address these areas, the Regents have suggested reasonable alternatives as highlighted briefly in the following table and as detailed in the following pages. With these alternative conditions, the Regents can support adoption of the Plan.

Table A. Summary of Regents' Response

Topic	Council Proposal	Regents' Alternative
Housing	Require construction of 450 housing units for faculty and staff (150 affordable to faculty and staff earning 60% AMI, and 300 affordable to faculty and staff earning 80% AMI).	Voluntarily commit to construct 450 housing units for faculty and staff at the affordability levels suggested by the City Council with some modifications to the proposed condition language to allow for greater geographic location and to reference household income as the eligibility standard for housing.
SOV Rate	Incrementally reduce the University's SOV rate goal to 12%.	Maintain the proposed 15% SOV rate goal that is reasonable and capable of being accomplished.
Parking	Include student housing stalls in the University's parking cap and reduce the cap to 9,000 stalls.	Include student housing stalls in the University's parking cap, but maintain the existing 12,300 stall cap.
Allowed Zoning Heights	Retain the existing 105-foot height limit on site W22.	Maintain the proposed 240-foot height limit on site W22.
Transit Investments	Pay the City an incremental share of the cost of various RapidRide lines on the City's implementation timeline with no cost cap.	Adopt a proposed schedule for the University's contribution to RapidRide lines that is tied to University development and contains a cost cap.
Bicycle Facilities	Construct separate pathways for users on the Burke Gillman Trail by 2024.	Separate users on the Burke Gillman Trail by 2024.
Findings, Conclusions, and Conditions	Adopt the Hearing Examiner's Findings, Conclusions, and Conditions with modifications proposed by the City Council.	Adopt the Hearing Examiner's Findings, Conclusions, and Conditions with modifications proposed by the Regents reflecting the University's position as a state institution of higher education and the alternative conditions proposed in this response letter.

We believe the Plan with the proposed alternative conditions mitigates impacts and meets the University's needs for growth, and we encourage the adoption of the Plan with these recommended changes. The Regents look forward to adopting the Plan after the City Council acts on it.

Sincerely,



Constance W. Rice
Chair, University of Washington Board of Regents

cc: Board of Regents
University President

Attachments:

Attachment 1 – Revised Findings

Attachment 2 – Revised Conclusions

Attachment 3 – Revised Conditions

1. Affordable Faculty and Staff Housing (Council Conditions 1 and 2)

1.1 Objection

The City Council lacks authority to condition the Plan on the construction of affordable faculty and staff housing.

1.2 Basis for Objection¹

There is no basis for the proposed affordable faculty and staff housing conditions in the City-University Agreement (“CUA”), the City’s conditioning authority pursuant to the State Environmental Policy Act (“SEPA”), the City’s police power, or the record.

1.2.1 CUA Authority

The City-University Agreement does not authorize the City Council to require construction of affordable housing as part of the Plan. It requires only that the University: a) encourage private developers to construct market-rate housing, b) continue to provide housing finance opportunities to its faculty and staff; and c) report to the City on its efforts to stimulate new housing production. CUA § II.H.3. The record demonstrates that the Plan and the University’s reporting practices are consistent with these policies. (Ex. D2 at 276-77, Ex. A25 at 8-9).

Contrary to this, the Hearing Examiner and SDCI relied on a single policy in the Housing Element of the 2035 Comprehensive Plan, Policy 5.19, to support affordable housing conditions. The Preliminary Decision perpetuates this error. Although the CUA requires the Hearing Examiner’s recommendations to be “based on the provisions of [the CUA], neighborhood plans and policies adopted by ordinance, SEPA, [and] other applicable land use policies and regulations of the City,” there is no evidence the University agreed that Housing Policy 5.19 is an “other applicable land use policy” within the meaning of the CUA. The CUA is a contract adopted in 1998 and amended in 2003. The City adopted the 2035 Comprehensive Plan, including Housing Policy 5.19, in 2016. *See* Ord. 125173. The record contains no evidence of mutual intent to be bound by a comprehensive plan policy adopted years after the CUA was signed.

There is also no evidence the parties have amended the CUA to include housing policies outside those in it or the Land Use and Neighborhood Planning Elements of the Comprehensive Plan in effect at the time the CUA was signed. Years of negotiation went into the housing provisions in the CUA, and those provisions are extremely detailed in what is required of the Plan. Those detailed provisions cannot be amended or supplemented unless both parties—the City and the University—agree. CUA § VIII.A. The City’s action to amend the CUA must also be adopted by ordinance. *Id.* This would be a Type V land use decision that requires its own GMA-compliant public process. *See* SMC 23.76.004, .036.C, and .062. None of the steps

¹ To the extent that prior legal briefing submitted by the University throughout the process for Plan approval is relevant to the objections contained in this letter the University incorporates such briefing by reference.

required to amend the CUA to include an affordable housing requirement have occurred. Using Housing Policy 5.19 as the basis for requiring the Plan to include affordable housing is an improper end-run around the agreed regulatory limits and process for amendments in the CUA, and an end-run around the process required for a Type V land use decision.

1.2.2 SEPA Authority

SEPA likewise does not provide a basis to impose the affordable housing conditions. The FEIS concluded there are no probable significant adverse impacts on housing because of the Plan. (Ex. A19 at 3.8-44). Although testimony at the Hearing Examiner hearing recognized the City's affordable housing programs like its Mandatory Housing Affordability program will not address all city-wide affordable housing needs, the FEIS does not rely on these programs as the sole basis for its conclusion. The conclusion is also based on the fact that the City's growth projections for the University District outpace the University's expected contribution to housing demand. What's more, SEPA does not allow the City to impose mitigation absent an identified impact, and it requires the City to base mitigation measures on policies in effect when the draft EIS issued. SMC 25.05.660.A.1; SMC 25.05.660.A.2. There is no relevant policy here. The City's SEPA housing policy does not apply to major-institution development, a fact aptly recognized by SDCI in its Recommendation. (Ex. D1 at 76). Finally, SEPA requires mitigation measures to be reasonable and capable of being accomplished. SMC 25.05.660.A.3. The record contains no evidence that the 450 affordable housing units required in the Council Conditions 1 and 2 meet this standard.

1.2.3 Police Power Authority

The City's inherent police powers do not authorize the affordable housing conditions either. If Council Conditions 1 and 2 are an attempt to exercise police power, then they are an unconstitutional imposition of an invalid tax. The Washington Constitution allows municipalities to impose taxes only where authorized by the Legislature. *San Telmo Associates v. City of Seattle*, 108 Wn.2d 20, 23, 735 P.2d 673 (1987). Rather than authorizing taxes and fees as a condition on land use approvals, the Legislature has prohibited them, whether imposed directly or indirectly:

No county, city, town, or other municipal corporation shall impose any tax, fee, or charge, either direct or indirect, on the construction or reconstruction of residential buildings, commercial buildings, industrial buildings, or any other building or building space or appurtenance thereto, or on the development, subdivision, classification, or reclassification of land.

RCW 82.02.020. In other words, the City of Seattle may not impose a tax or fee as a condition to a land use approval like the Plan. *See also R/L Associates, Inc. v. City of Seattle*, 113 Wn.2d 402, 408-09, 780 P.2d 838 (1989); *Laurelhurst Cmty. Club v. City of Seattle, Central Puget Sound Growth Mgmt. Hearings Bd.*, Case No. 03-3-0008, 2003 WL 22896421 at *9 (June 18, 2003) ("Laurelhurst I").

Requiring the construction of affordable housing as a condition to approval of the Plan is an in-kind tax prohibited by RCW 82.02.020. "If 'the primary purpose of an ordinance is to

accomplish desired public benefits which cost money,’ the ordinance is a tax. If ‘the primary purpose is to regulate’ then it is a regulation.” *San Telmo*, 108 Wn.2d at 24 (quoting *Hillis Homes, Inc. v. Snohomish County*, 97 Wn.2d 804, 809, 650 P.2d 193 (1982)). The Washington Supreme Court’s analysis in *San Telmo Associates* is on point. In that case, private developers challenged a Seattle ordinance requiring them to replace housing or pay into a low-income housing fund as a condition to obtaining a housing-demolition license. *Id.* at 22. The Supreme Court invalidated the ordinance because it ran afoul of RCW 82.02.020:

Requiring a developer either to construct low income housing or ‘contribute’ to a fund for such housing gives the developer the option of paying a tax in kind or in money....The City is instead shifting the public responsibility of providing such housing to a limited segment of the population. This shifting is a tax, and pursuant to RCW 82.02.020, it cannot be allowed.

Id. at 24. Two years later, the Supreme Court broadened the statute’s application in *R/L Associates*, 113 Wn.2d at 409, holding that the characterization of a payment is irrelevant because “regardless of whether a payment is characterized as a tax or a regulatory fee, it is prohibited unless specifically excepted.” The Seattle ordinance in that case required developers, as a condition to redevelopment of low-income rental housing, to provide low-income tenants with relocation assistance or a payment. *See id.* at 404.

Conditions 1 and 2 are a third trip down this same constitutionally defective path. The Conditions are not tied to actual development on campus. They are instead an effort to shift the general social costs of development onto the University under the guise of regulation. The City has no authority to tax the University, directly or indirectly in the form of a condition on the Plan, just because it “would lead to...employment growth.” Comp. Plan Housing Policy 5.19. “Quite simply, the municipal body cannot shift the social costs of development on to a developer under the guise of regulation.” *San Telmo*, 108 Wn.2d at 24.

1.2.4 Lack of Evidence in the Record

Last, the record does not support the affordable housing conditions. Contrary to language proposed to be added to the Conclusions by the City Council, the University has objected to and challenged statements by public commenters on alleged affordable housing needs at every point in the Plan review process because such commenters have never produced background data to support their assertions. *See, e.g.* Resolution 31839, Att. 2 at 4; University Petition for Further Consideration; University Response to Petitions for Further Consideration. Instead of providing data, commenters have said that the University should have this information. Sally Clark, the University’s Director of Regional and Community Relations, clarified at the City Council hearing however, that although the University does know what it pays its employees, it does not track household income data, which is the relevant metric for measuring affordable housing needs and eligibility. Thus, there is no substantiated evidence in the record that supports public commenters’ assertions about faculty and staff affordable housing needs. The speculative numbers in the record do not meet the “substantial evidence” standard the City Council must apply.

Given the lack of authority to impose affordable housing conditions, the City Council should adopt the reasonable alternative below.

1.3 Reasonable Alternative

The University is deeply engaged in developing affordability solutions for students, faculty, and staff. In this vein, careful consideration has gone into whether 450 units can be accomplished. While continuing to reserve its rights to object to the City's authority to impose affordable housing conditions, the Regents will adopt the Plan if the condition language reflects the University's voluntary commitment to construct 450 housing units for faculty and staff. This is a "stretch" figure, but one that the University believes could be accomplished over the life of the Plan with the modifications for the location of such housing included in the alternative condition language. The University also believes the condition language should reflect *household* income because that is the standard metric for measuring affordable housing eligibility.

The City Council should adopt the alternative condition language below.

Alternative Conditions 1 and 2:

Condition 1: Amend page 276 of the Housing section to include the statement, "The University ~~shall commit to voluntarily~~ construct no fewer than 150 affordable housing units for faculty and staff households earning less than 60% AMI and no fewer than 300 additional affordable housing units for faculty and staff households earning less than 80% AMI within the MIO boundary, Primary Impact Zone, ~~or~~ Secondary Impact Zone, or within the City of Seattle near light rail stations or frequent transit routes prior to the completion of 6 million net new gross square feet authorized by the CMP."

Condition 2: A condition of the Master Plan shall state: "The University ~~shall commit to voluntarily~~ construct no fewer than 150 affordable housing units for faculty and staff households earning less than 60% AMI and no fewer than 300 additional affordable housing units for faculty and staff households earning less than 80% AMI within the MIO boundary, Primary Impact Zone, ~~or~~ Secondary Impact Zone, or within the City of Seattle near light rail stations or frequent transit routes. ~~All the required housing shall be constructed~~ prior to the completion of 6 million net new gross square feet authorized by the CMP."

2. Single Occupancy Vehicle Rate (Conditions 28, 29, 30, 31, and 32)

2.1 Objection

The City Council lacks authority to condition the Plan on a 12% single-occupancy-vehicle rate goal.

2.2 Basis for Objection

There is no basis for the proposed 12% SOV rate goal in the CUA, the City's conditioning authority pursuant to SEPA, or the record.

2.2.1 CUA Authority

The CUA does not require a particular SOV rate. The CUA instead sets out a policy that, through the University's Transportation Management Plan ("TMP"), "[t]he use of the single occupant private automobile for travelling to, from and on the campus will be discouraged through the provision of facilities and services favoring alternative modes." CUA § III.C.2. The University's 15% SOV rate goal is consistent with this policy, and the CUA does not require more.

2.2.2 SEPA Authority

SEPA likewise does not require a lower SOV rate. SEPA mitigation must be tied to an impact, and it must be reasonable and capable of being accomplished. SMC 25.05.660.A.2 – A.3. There is no evidence that any significant adverse impacts will remain after accounting for the transportation conditions the University has already accepted and the 15% SOV goal in the Plan. For instance, with a 15% SOV rate goal, the University will remain in compliance with the trip cap commitments in its TMP. (Ex. A19 at 3.16-64). Further, if the University's SOV rate goal was lower, then the SEPA and factual basis for other transportation conditions on the Plan would need to be reassessed. This would impact the scope and need for at least Conditions 62, 63, and 65, and possibly others.

Given the mitigating effect of the other transportation conditions and the other elements of the University's proposed TMP, the Hearing Examiner correctly concluded that a 15% SOV goal is reasonable and capable of being accomplished. (HE Rec. at 24). This statement was erroneously deleted from the Preliminary Decision and it was not replaced with a similar conclusion for the 12% SOV rate goal because there is no evidence in the record supporting that assertion. In fact, the opposite is true. Evidence in the record questions whether a 12% SOV rate proposal is reasonable and capable of being accomplished. The Department's Transportation Planner testified at the City Council hearing that:

"A decrease from 17% to 15% doesn't seem great, but two factors need to be kept in mind. One is that mathematically going from 17% to 15% is still a 10 to 15% reduction in SOV trips; it is not simply a 2% reduction...but probably, the more important point is that those trips as you get closer and closer to a very low number may be the trips that are hardest to shift out of auto modes, it's not saying that a good effort shouldn't be made, but it isn't likely to be as easy to get the last 15% of any population than it would be to shift from a higher number to a lower number if there was a higher SOV rate at the outset.

Thus, no evidence supports the assumption that a 12% SOV rate goal is reasonable and capable of being accomplished.

2.2.3 Lack of Evidence in the Record

The record likewise shows that the Seattle Department of Transportation supports a 15% SOV goal. (Ex. D18 at ¶ 17). This goal is also consistent with the Comprehensive Plan's SOV goal for trips in the University District by 2035. Comp. Plan. at 75; last amended by Ord. 125428. Further, the record shows that a 15% goal is far ahead of goals for other major institutions. It is 35 percentage points lower than what is required by the land use code. See SMC 23.54.016.C. It is also less than half of the goal recently set for Seattle University and Swedish Cherry Hill, with respective goals of 35% and 32%. (Applicant Post-Hearing Br. at 10 n. 4). There is no basis for a further reduction to 12%.

2.3 Reasonable Alternative

The University has the best SOV rate in the City. The University intends to stay in the lead on mode splits and will strive to meet its SOV rate goal and achieve the lowest possible SOV rate annually over the life of the Plan; however, the law and the record do not support a 12% SOV rate goal. The City Council should reinstate the 15% SOV rate goal and retain the Hearing Examiner's Conclusion that it is reasonable and capable of being accomplished.

If the Council does not reinstate the 15% SOV rate goal, then the University will object to the City's authority to impose transportation conditions like Conditions 62, 63, and 65 because the basis for imposing those conditions will need to be reassessed.

3. Vehicle Parking (Council Conditions 11, 12, 15, 16, 17, and 19)

3.1 Objection

The City Council lacks authority to lower the vehicle parking cap to 9,000 stalls.

3.2 Basis for Objection

There is no basis to lower the vehicle parking cap to 9,000 stalls in the CUA, SEPA, or the record.

3.2.1 CUA Authority

There is no CUA policy that requires reduction of the University's parking space cap. In fact, the CUA's policies suggest the opposite—that parking must be maintained on campus to prevent impacts to off-campus street parking and adjacent neighborhoods. *See* CUA § III.C.5.

3.2.2 SEPA Authority

Further, there is no SEPA basis to reduce the parking cap. Conditions imposed under SEPA must be reasonable and capable of being accomplished. SMC 25.05.660.A.3. A reduction in the parking cap would be unreasonable and cumulative when combined with the University's other efforts to mitigate traffic impacts. Again, the record shows that the University has already committed to meeting an aggressive 15% SOV rate and there are specific consequences if it does not meet the goal. To meet the goal, the University has set out several strategies for parking

management including pricing flexibility to reduce single-occupant vehicles, instituting a pay-per-use parking model, and continuing to use parking revenue to fund other trip-reduction programs like the U-PASS. (Ex. D2 at 265-266). The University needs flexibility to adjust these parking strategies to meet the SOV goal and react to changing campus conditions. Mandating a lower parking cap would unreasonably undermine these efforts.

In addition, there is no SEPA policy that grants the City authority to reduce the parking cap. Although the City does maintain SEPA policies related to parking, those policies: a) are not applicable in the University District Urban Center, and b) generally contemplate requiring projects to provide *more* parking to avoid off-site parking impacts. They do not contemplate requiring *less* parking. *See* SMC 25.05.675.M.2.b.2, Q.2.f.i.

3.2.3 Lack of Evidence in the Record

Last, the record shows that the parking cap is proportional to anticipated demand. The City Council appears to mistakenly conclude that lowering the parking cap is achievable because current parking demand is less than 9,000 stalls. However, the Council has failed to account for future demand. The FEIS concludes that the current parking cap will accommodate the estimated addition of 1,660 vehicles over the life of the Plan. (*See* Ex. A19, App. D at 5-40). This estimated new demand would exceed capacity if the cap was reduced to 9,000 spaces. (*Id.*). Capacity must meet demand so surrounding neighborhoods do not experience adverse parking impacts. This is a long-term commitment the University has made to its neighbors.

3.3 Reasonable Alternative

The City Council proposed to: a) count student housing parking spaces toward the parking cap, b) remove the requirement for constructing parking with student housing, and c) lower the parking cap. The University can accommodate including student housing parking within the parking cap and removing the requirement for constructing parking with student housing. The University cannot, however, lower the parking cap to 9,000 spaces because demand would exceed capacity. The City Council should reinstate the 12,300-space cap.

4. Allowed Zoning Heights (Proposed Map Change)

4.1 Objection

The proposed height limit for sites W22 and W37 should not be lowered.

4.2 Basis for Objection

The record supports the proposed height limit for sites W22 and W37. The height limits proposed in the Plan were developed over many years with significant feedback from stakeholders within the University and outside it. The University modified many development sites and height limits to ensure future development fits its context and balances the University's needs with significant open spaces. In recognition of this, neither SDCI nor the Hearing Examiner supported lowering the height limits proposed in the Plan.

The City Council appears to have voted to retain the existing 105-foot height limit for site W22 because this site is viewed as a “gateway” by University District stakeholders who think a lower height is in keeping with this designation. However, approving the proposed 240-foot height will not prevent a development from incorporating “gateway” elements, and the design guidelines in the Plan recognize this is important. (*See* D2 at 195). The 240-foot height is the same height allowed in adjacent sites off-campus. The site is also in West Campus just a few blocks from the planned light rail station where it is appropriate to locate density.

Further, although Council did not discuss the development standards that will apply to site W22, they are important to understanding how future development of the site will be guided to ensure the building fits within its context and is comparable to adjacent development. Such development standards include:

- A site-specific gross floor area limit;
- A podium height limit of 45 feet;
- A 75-foot tower separation requirement from adjacent buildings; and
- Upper-level setbacks.

Applying these development standards, the record indicates that site W22 would have a maximum theoretical tower floor plate size of approximately 12,100 square feet, which is comparable to the maximum floor plate limit for residential towers in the adjacent University District that are allowed between 10,700 and 11,500 square foot floorplates. *See* SMC 23.48.645.

Development standards for site W37 similarly ensure it fits in context with the proposed 130-foot height limit. Accounting for grade changes, the 130-foot height proposed is consistent with the height allowed in adjacent off-campus Midrise zones. (Ex. A33). The Plan also includes an upper floor area limit and view corridor that will ensure upper floors of a new building are set back to protect views from the south and west from University Bridge.

Given the development standards and the record, the proposed Plan heights for sites W22 and W37 are appropriate and should not be lowered.

4.3 Reasonable Alternative

The City Council should maintain the proposed Plan heights for sites W22 and W37.² The proposed zoning maps should be updated to reflect the proposed Plan heights.

² Although the Preliminary Decision only proposed lowering the height limit for site W22, the height limit for site W37 is also addressed here because it was a topic of discussion for the City Council.

5. Level of Transit Investment (Council Condition 65)

5.1 Objection

The City Council lacks authority to impose transit mitigation conditions that don't meet SEPA's standards.

5.2 Basis for Objection

Condition 65 proposes the University fund RapidRide improvements in the University District to mitigate reductions in transit speeds. However, this condition: a) fails to account for mitigation provided by other transportation conditions, b) lacks requisite clarity and triggers, and c) is based on a flawed approach for calculating the University's proportionate funding share.

Condition 65 is targeted at mitigating reductions in transit speeds caused by congestion. However, the University has already agreed to fund Intelligent Transportation System ("ITS") improvements that will alleviate congestion and increase both vehicle and transit speeds. SDCI's Recommendation on the Plan recognizes this is the case. It states: "Busses in the University District operate on arterial streets used by general-purpose traffic, and are delayed by the same congestion discussed earlier in *Vehicular Operations*." (Ex. D1 at 86). Mr. Glass-Hastings, a SDOT representative, also testified at the Hearing Examiner hearing that 90 percent of transit delays are attributable to traffic congestion. (Glass-Hastings Testimony). Thus, ITS improvements will benefit transit speeds. Condition 65 doesn't account for this, which is improper "double-dipping."

In addition, Condition 65 as currently written doesn't account for overlap in how the RapidRide lines are defined by SDOT or clarify how funding for RapidRide infrastructure is segregated between multiple lines. Neither is the payment schedule in the Condition tied to actual University development (the trigger for the potential impact in the first place) nor is there a cap on the undefined costs in the Condition. Without a cap in place, the Condition is unreasonable and it can't be determined to be capable of being accomplished by a state agency with constrained funding sources.

Last, the Condition relies on a flawed proportionate share methodology for calculating the University funding percentage that is based on reductions in transit speeds. Under the SEPA, a mitigation measure may be imposed "only to the extent attributable to the identified adverse impacts of its proposal." SMC 25.05.660.A.4. By focusing on the effect of traffic on transit speeds, the City is requiring the University to mitigate the impact of background growth—not just additional traffic from the Plan. It is essentially requiring the University to mitigate the *effect* of an impact that is magnified by unrelated factors, not the *cause*. The University's traffic consultant explained that contribution to traffic-congestion mitigation should be based on a project's contribution to the cause rather than the measure of its effect. (M. Swenson Testimony). SDCI's Transportation Planner agreed this is an appropriate way to assess mitigation contributions. (J. Shaw Testimony). The cause of reductions in transit speeds is increased traffic congestion. Any mitigation imposed should be based on the Plan's contribution to the cause of an impact—i.e., the actual traffic generated.

The language of Condition 65 should be updated to fix these flaws.

5.3 Reasonable Alternative

The University shares the City’s desire to see transit improvements in the University District area, but it cannot accept conditions that do not meet SEPA’s requirements. In addition, the University needs certainty in the costs of University development. The University believes the proposed language below meets these parameters and fairly contributes to RapidRide infrastructure through the University District.

The City Council should adopt the alternative condition below.

Alternative Condition 65: The University shall fund SDOT capital improvements, as such improvements are identified by SDOT and agreed to by the University that facilitate transit performance within the Primary and Secondary Impact Zones, up to but not exceeding \$10 million dollars payable upon completion of the following development increments:

1. Occupancy of 500,000 net new gross square feet - \$2.5 million
2. Occupancy of 1 million net new gross square feet - \$2.5 million
3. Occupancy of 1.5 million net new gross square feet - \$2.5 million
4. Occupancy of 2 million net new gross square feet - \$2.5 million

NOTE: The Regents reserve the right to reevaluate this condition based on the outcome of the City Council’s decision on the SOV rate goal.

6. Bike Facilities (Council Condition 69)

6.1 Objection

The language in Council Condition 69 does not reflect the University’s stated commitment for Burke Gillman Trail improvements.

6.2 Basis for Objection

The University committed to “separating users” on the Burke Gillman Trail by 2024 in briefing to the City Council in recognition of the fact that separation would maintain levels of service at an acceptable level. City Council Condition 69 states that the University will “construct separate pathways,” which is a larger scale undertaking than separation of users, and though part of the University’s long-range plan, is not achievable in the 2024 timeframe.

6.3 Reasonable Alternative

The City Council should modify the condition language as follows to acknowledge the University’s commitment:

Alternative Condition 69: The University shall ~~construct~~ separate ~~users pathways for bicyclists and pedestrians~~ on the Burke-Gilman Trail through the campus, and install lighting

following the University's Facilities Design Guidelines and Campus Illumination Study, or successor documents, by 2024.

7. Findings, Conclusions, and Conditions

7.1 Objection

Portions of the Findings, Conclusions, and Conditions in the Preliminary Decision do not reflect the University's position as a state institution of higher education and are inconsistent with the alternative conditions proposed in this response letter.

7.2 Basis for Objection

The Findings, Conclusions, and Conditions in the Preliminary decision were updated to reflect the City Council's proposed modification of Plan conditions. For consistency, the Findings, Conclusions, and Conditions must be updated to reflect the Regents alternative conditions. In addition, the Hearing Examiner failed to include Findings and Conclusions reflecting the University's position as a state institution of higher education with constrained funding sources. The documents should be updated to accurately reflect the University's position.

7.3 Reasonable Alternative

The City Council should modify the Findings, Conclusions, and Conditions consistent with Attachments 1-3 to this response letter.

8. Recital Acknowledgement

The Regents acknowledge the minor amendments and non-binding recitals proposed by the City Council in the Preliminary Decision related to childcare, priority hire, small business space, small business leasing, stormwater best practices, and the CUA.

Attachment 1

Seattle City Council Findings of Fact Related to the University of Washington 2018 Seattle Campus Master Plan

The City Council intends to adopt the following findings of fact regarding the University of Washington 2018 Seattle Campus Master Plan (Clerk File 314346), as proposed by the Seattle Hearing Examiner on January 17, 2018 and as amended by the Council.

BACKGROUND

University of Washington

1. The University of Washington is a state institution of higher education. The University’s primary mission is “the preservation, advancement, and dissemination of knowledge.”¹ It carries out this mission and provides significant public benefits through education, research, and patient care.²

2. The University of Washington is a fully accredited, publicly-funded university. The University’s academic program is divided into 14 schools and colleges (containing approximately 125 academic departments and degree programs).³ The University’s library system is one of the largest research libraries in North America, with over five million annual users.⁴ In 2014, the University educated 43,724 full-time equivalent (“FTE”) students on its Seattle campus, and it conferred more than 15,000 degrees.⁵

3. The University of Washington is well-known for its research.⁶ University research directly benefits education at the University.⁷ Thousands of students gain hands-on experience working on research projects each year, enriching their education and gaining skills attractive to employers.⁸

4. As a public institution, the University of Washington is dependent on funding from legislative appropriations, student tuition and fees, grants, and private gifts.⁹ Currently, approximately 65 percent of the University’s operating funds are generated by student tuition and

¹ Exhibit D1 at 16.

² Exhibits A26-27, A31.

³ Exhibit A19 at 2-9 to 2-10.

⁴ *Id.*

⁵ *Id.* at 3.7-2; Exhibit A26 at 3.

⁶ Exhibit A26 at 10.

⁷ *Id.*

⁸ *Id.*

⁹ Testimony of T. Doherty and S. Clark

fees, and approximately 35 percent are the result of legislative appropriations.¹⁰ Much of the University's funding from the Legislature and other sources comes earmarked for certain purposes.¹¹ The University does not have the same control over its funding as a private corporation.¹²

Legal Framework for Master Plan

15. Code. Seattle Municipal Code (SMC) Section 23.84A.025 defines a "Major Institution" as "an institution providing medical or educational services to the community. A Major Institution, by nature of its function and size, dominates and has the potential to change the character of the surrounding area and/or create significant negative impacts on the area. To qualify as a Major Institution, an institution must have a minimum site size of sixty thousand (60,000) square feet of which fifty thousand (50,000) square feet must be contiguous, and have a minimum gross floor area of three hundred thousand (300,000) square feet. The institution may be located in a single building or a group of buildings that includes facilities to conduct classes or related activities needed for the operation of the institution."

26. The SMC requires that each major institution have a Major Institution Master Plan approved by the City Council, as provided in Chapter 23.69. SMC 23.69.002 states that the purpose of the chapter is to regulate major educational and medical institutions in order to:

- A. Permit appropriate institutional growth within boundaries while minimizing the adverse impacts associated with development and geographic expansion;
- 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;
- 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;
- D. Provide for the coordinated growth of major institutions through major institution conceptual master plans and the establishment of major institution overlay zones;
- E. Discourage the expansion of established major institution boundaries;
- 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;

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

- 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;
- 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;
- 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;
- 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;
- 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;
- 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; 2) provide the neighborhood advance notice of the development plans of the major institution; 3) allow the city to anticipate and plan for public capital or programmatic actions that will be needed to accommodate development; and 4) provide the basis for determining appropriate mitigating actions to avoid or reduce adverse impacts from major institution growth; and
- M. Encourage the preservation, restoration and reuse of designated historic buildings.⁴¹³

37.² The SMC establishes a Major Institution Overlay (“MIO”) District to overlay each major institution and creates nine MIO designations and corresponding height limits to be used within an MIO District.¹⁴ The MIO District for the University of Washington was created in 1985 by Ordinance 112317.

48. SMC 23.69.006.A applies the major institution chapter’s regulations to “all land located within the Major Institution Overlay District “unless specifically modified by this chapter or an adopted master plan.” However, for the University of Washington, the first sentence of SMC 23.69.006.B states that “notwithstanding subsection A of this section above, the 1998 agreement

⁴¹³ Emphasis added.

² SMC 23.09.004.

¹⁴ SMC 23.09.004.

between The City of Seattle and the University of Washington, or its successor, shall govern” the following matters:

- relations between the City and the University of Washington,
- the master plan process (formulation, approval and amendment),
- uses on campus,
- uses outside the campus boundaries,
- off-campus land acquisition and leasing,
- membership responsibilities of CUCAC,
- transportation policies,
- coordinated traffic planning for special events,
- permit acquisition and conditioning,
- relationship of current and future master plans to the agreement,
- zoning and environmental review authority,
- resolution of disputes, and
- amendment or termination of the agreement itself.³¹⁵

The second sentence of SMC 23.69.006.B states that “[w]ithin the Major Institution Overlay (MIO) Boundaries for the University of Washington, development standards of the underlying zoning may be modified by an adopted master plan, or by an amendment or replacement of the 1998 agreement between the City of Seattle and University of Washington.⁴¹⁶

59. City-University Agreement. The 1998 Agreement between the City and the University (“City-University Agreement” or “Agreement”), as amended in 2003 and 2004 and adopted by Ordinance 121688, is a contract between the City and the University and a development regulation. The Agreement recites, in part, that both parties “recognize that the University is a major resource of the City, state, region and nation,” ~~that its~~ and that the presence of the University within the confines of the City greatly enhances the cultural, social, and economic well-being of the City...[and that] the University will continue to develop its physical facilities and its teaching, research, and service programs.” The Agreement further states that both parties recognize that the University’s “continued development impacts the environment of the University and its surrounding neighborhoods and the ~~city~~ City services which support the entire community,” and that there is a “need for coordinated, comprehensive planning of University development in order to allow the University to pursue its goals of instruction, research and service to Seattle and the broader society and, at the same time, to foresee, assess, and mitigate the direct, indirect and cumulative impacts of long-term development on the physical and human environment and on City services.”⁵¹⁷

³¹⁵ Reformatted for clarity; emphasis added.

⁴¹⁶ Emphasis added.

⁵¹⁷ Exhibit D5 at 2.

610. Section II.A of the Agreement addresses “Formulation of the Master Plan,” and states that the University will prepare:

a 10-year conceptual Master Plan and Environmental Impact Statement (“EIS”) which will include the following elements:

a. Boundaries of the University of Washington as marked on the [City’s] Land Use Maps ... and any proposed changes.

b. Proposed non-institutional zoning designations for all areas within the boundaries.

c. A site plan which will provide:

(1) the height and location of existing facilities;

(2) the location of existing and proposed open space, landscaping, and screening; and

(3) the general use and location of any proposed development and proposed alternatives.

d. The institutional zone and development standards to be used by the University.

e. A general description of existing and proposed parking facilities and bicycle, pedestrian, and traffic circulation systems within the University boundaries and their relationship to the external street system.

f. A transportation plan which will include specific University programs to reduce traffic impacts and to encourage the use of public transit, carpools, vanpools, and other alternatives to single occupancy vehicles. The traffic and transportation programs included herein will be incorporated into the Master Plan, unless program revisions have been made in accordance with the provisions of this Agreement.

g. A general description of future energy and utility needs, potential energy system and capacity improvements, and proposed means of increasing energy efficiency.

h. A description of alternative proposals for physical development, including explanation of the reasons for considering each alternative.

- i. Proposed development phases, including development priorities, estimated timetable for proposed developments, and proposed interim uses of property awaiting development.
- j. A description of any proposed street or alley vacation.
- k. Information required by Section II.E.2.^{618, 719}

⁷¹¹. Section II.A.2 of the Agreement provides that the Master Plan and EIS “will include information on its proposed developments” and a “proposed development schedule in sufficient detail to permit analysis of impacts on adjacent neighborhoods and City facilities and services. The Master Plan and EIS will include boundaries surrounding the University identified as Primary and Secondary Impact Zones” as defined in the map attached to the Agreement.⁸²⁰ “The Primary and Secondary Impact Zones will be used to assess and monitor the direct, indirect, and cumulative impacts resulting from all proposed University developments.”⁹²¹

⁸¹². Section II.B of the Agreement provides the procedures for review and approval of the Master Plan, which supersede those set forth in Chapter 23.69 SMC. The procedures provide for the formation of the City-University-Community Advisory Committee (“CUCAC”), which holds public hearings on, reviews, and provides comments and recommendations on both the Master Plan and EIS.⁴⁰²² The Agreement also states that the Director of the Department of DPD (now SDCI) is to submit to the Hearing Examiner the Master Plan, EIS, and report of CUCAC, and a written report of findings and recommendations relating to:

- (1) Consistency of the proposed final Master Plan with the objectives of the City’s Major Institutions Policy, SEPA, and other adopted land use policies and regulations of the City;
- (2) Comments received from affected City departments and other governmental agencies;
- (3) Proposed conditions for mitigating adverse environmental impacts;
- (4) Reasons for differences, if any, between the findings of the Director and CUCAC;

⁶¹⁸ Emphasis added.

⁷¹⁹ Section II.E.2 of the Agreement concerns the conduct of University academic and research activities in leased facilities.

⁸²⁰ See Exhibit D5, Exhibit A.

⁹²¹ *Id.* at 4.

⁴⁰²² The composition of the CUCAC is addressed in Section G of the Agreement, Exhibit D5 at 13.

(5) Recommendations on whether the proposed final Master Plan should be approved as proposed, conditioned, or denied.⁴⁴²³

~~9~~13. Section II.B.8.d of the Agreement states that the Director’s “review and recommendation shall be based on the provisions of this Agreement, neighborhood plans and policies adopted by ordinance, SEPA, [and] other applicable land use policies and regulations of the City,” and “shall also consider ... the need for University development to allow the University to fulfill its mission of public instruction, research, and services... and whether the proposed development and changes represent a reasonable balance of the public benefits of development and change with the need to maintain the livability and vitality of adjacent neighborhoods.”⁴⁴²⁴

~~10~~14. Section II.B.9 of the Agreement provides that following the Examiner’s hearing on the Master Plan, the Examiner is to submit “recommendations to the City Council based on the provisions of this Agreement, neighborhood plans and policies adopted by ordinance, SEPA, [and] other applicable land-use policies and regulations of the City”.⁴⁴²⁵

~~11~~15. Section II.B.10 of the Agreement provides that the City Council will “hold a public hearing on the University’s proposed final Master Plan-.”²⁶ The Council held a hearing on the Master Plan on July 31, 2018.⁴⁴

~~12~~16. Section II.B.11 of the Agreement provides that the City Council will “consider the record before the Hearing Examiner and the comments received at its public hearing and will prepare a preliminary decision.” That preliminary decision will be distributed in order to elicit responses from parties of record.⁴⁵²⁷

~~13~~17. Section II.B.12 of the Agreement provides that “After considering the responses the Council will consider and act on the University’s final Master Plan.”²⁸ 46The City Council’s review of the Master Plan is a quasi-judicial proceeding, governed by its Rules for Quasi-Judicial Proceedings. Under such rules, the City Council’s decision must be “based solely on evidence in the record.” Council Rules Section VIII.A.

⁴⁴²³Exhibit D5 at 4-5 (emphasis added).

⁴⁴²⁴ *Id.* at 6 (emphasis added).

⁴⁴²⁵ *Id.*

²⁶ *Id.*

⁴⁴ *Id.*

⁴⁵²⁷ *Id.*

²⁸ *Id.*

⁴⁶ *Id.*

18. Section II.B.13 of the Agreement provides that “The University’s Master Plan will not become final until the ordinance approving it has become law pursuant to the City Charter and the Master Plan has been adopted by the University’s Board of Regents.”

1419. Prior Litigation. In responding to a challenge to the City’s adoption of the University’s existing (2003) master plan, the City and University argued to the Central Growth Management Hearings Board (“GMA Board”), and the GMA Board concluded, that the master plan is not a subarea plan but instead constitutes a request for approval of a development plan that, although programmatic in nature, is a land use decision that establishes development requirements for specific pieces of property under one ownership. The Board used the analogy of a site plan approval, observing that the master plan “generally establishes the location, dimension, and function of major structures on the University campus.”⁴⁷²⁹

1520. In a subsequent challenge to a City ordinance that amended the City-University Agreement, the GMA Board rejected the City’s and University’s argument that the Agreement was not a development regulation and thus, was not subject to the goals and policies of the GMA. The GMA Board concluded that the Agreement “has the effect of being a local land use regulation”. Consequently, the Agreement met the GMA’s definition of “development regulations’ or ‘regulation’” (defined as “the controls placed on development or land use activities by a county or city”).⁴⁸³⁰ The challenge to it was therefore within the GMA Board’s subject matter jurisdiction.⁴⁹³¹

1621. In a 2017 decision on the University’s challenge to the City’s authority to apply its Landmarks Preservation Ordinance to the Seattle campus, the Washington State Supreme Court determined that as a state agency, the University is included in the GMA’s requirement that state agencies “shall comply with the local comprehensive plans and development regulations ... adopted pursuant to” the GMA, but that a local development regulation could not be used to preclude the siting of an essential public facility, including state education facilities.^{20,32}

Existing Conditions

1722. The University’s Seattle campus is generally bounded on the west by the University Bridge (with the exception of several buildings west of the bridge on the north side of the water); on the north by NE 41st Street between Roosevelt Way NE and 15th Avenue NE, and then by NE 45th

⁴⁷²⁹ *Laurelhurst Cmty. Club v. City of Seattle*, Central Puget Sound Growth Mgmt. Hrngs. Bd., Case No. 03-3-008, 2003 WL 22896421, (*Laurelhurst I*) at 5-8 (June 18, 2003).

⁴⁸³⁰ RCW 36.70A.030(7).

⁴⁹³¹ *Laurelhurst Cmty. Club v. City of Seattle*, Central Puget Sound Growth Mgmt. Hrngs. Bd., Case No.03-3-0016, 2004 WL 3275206, (*Laurelhurst IP*) at 11-12.

²⁰ *University of Washington v. City of Seattle*, 188 Wn. 2d 823, 837-839, 399 P.3d 519 (2017).

³² *University of Washington v. City of Seattle*, 188 Wn. 2d 823, 837-839, 399 P.3d 519 (2017).

Street; on the east by Union Place NE; and on the south by Lake Washington’s Union Bay, the Lake Washington Ship Canal, and Portage Bay.²⁴³³

1823. “Campus land uses are organized in a traditional pattern for a large and complex university. Academic, administrative, and student support activities are generally clustered in an elongated core on the Central Campus, which extends into the eastern portions of the West Campus. Instruction and research facilities are largely located to the north and south of this core, with liberal arts and social sciences predominating on the north, and physical and life sciences and engineering predominating on the south. Health Sciences, Oceanography, and Fisheries are located separately in the South Campus, with extensions into West Campus.”²²³⁴ Recreation and athletic facilities, as well as the Center for Urban Horticulture and the Union Bay Natural Area, are located on the East Campus, east of Montlake Boulevard.

1924. “Physical plant support activities are generally located in peripheral campus areas, although a few activities occupy key central locations. Except for parking garages and scattered small parking lots, parking is also located peripherally. Parking is a major land use in both the South and East Campus sectors. Student housing is concentrated primarily in ... the West Campus and the northeast portion of the Central Campus.”²²³⁵

2025. The University owns approximately 639 acres within the campus boundary, which includes approximately 12,000 linear feet of shoreline. Approximately 60 acres within the boundary are owned by the City (park land and street rights-of-way) and private entities (Jensen Motorboat Company, the Church of Jesus Christ of Latter Day Saints, and the College Inn.). Much of the East Campus (east of Montlake Boulevard) is constructed on a methane-producing former landfill and seismic liquefaction zone, and the area includes submerged land and unstable peat islands.

2126. The campus includes approximately 307 permanent and temporary buildings that, together, equal approximately 17 million gross square feet of development and encompass a broad spectrum of sizes and vintages. The campus also includes both private and public roads and streets,²⁴³⁶ paved and unpaved walkways, parking areas, landscaping, natural open space, and bulkhead and natural shoreline.

2227. Existing MIO height districts vary from 37 feet to a small area of 240 feet and are shown in the ~~proposed~~ Master Plan at page 73.

²⁴³³ See, e.g., Exhibit D2, 2018 Seattle Campus Master Plan, at 7 (Figure 2).

²²³⁴ Exhibit D1, SDCI Director’s Analysis and Recommendations (“Director’s Report”) at 5.

²²³⁵ *Id.*

²⁴³⁶ See Exhibit D2 at 67.

2328. A detailed discussion and illustrations of existing conditions is contained in Chapter 4 of the Master Plan, at pages 38 through 146.

PROPOSED MASTER PLAN

2429. Under the Master Plan, the Seattle campus is forecast to add 15,676 students, faculty and staff to the 2014 campus population.²⁵³⁷

Potential New Development

2530. Within the Master Plan, the University campus has been divided into four sectors: Central Campus, West Campus, South Campus, and East Campus. The plan identifies 86 potential development sites throughout the campus to accommodate future growth of six million net new gross square feet (the “Growth Allowance”). New construction located below grade, areas associated with buildings that would be demolished in conjunction with new construction, and structured parking are not included in the net new gross square footage calculation.²⁶³⁸ Each potential development site is defined in terms of maximum height and total maximum gross square feet. However, not all sites will be developed. Over the lifetime of the Plan, the University will select the actual development sites through its annual capital planning and budgeting process.

2631. Although a 10-year planning horizon was used to formulate the Master Plan, it will remain in effect until development of the Growth Allowance is complete or a new master plan is approved.²⁷³⁹

2732. In addition to accommodating projected enrollment increases, the Growth Allowance would help reduce existing space deficits and accommodate continued growth in the areas of research and service on the Seattle campus, thereby supporting the University’s innovation and industry partnerships.²⁸⁴⁰

2833. The following table (Table 13) is found at p. 232 of the Master Plan:

	POTENTIAL NET NEW DEVELOPMENT (GROSS SQ. FT.)	NET NEW MAXIMUM DEVELOPMENT (GROSS SQ. FT.)	MAXIMUM DEVELOPMENT LIMIT (%)
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²⁵³⁷ Exhibit A19 (FEIS), Appendix D at 2-6 (Table 2.2). This number is slightly higher than the number included in the Master Plan at page 30. The EIS analysis translates campus growth, as reflected in increased building square footage, to trips related to the three components of the campus population. *Id.* 2-5.

²⁶³⁸ Exhibit D2 at 124 and 255.

²⁷³⁹ Exhibit D2 at 86.

²⁸⁴⁰ *Id.* at 34-35; Exhibit A19 at 1-2.

CENTRAL	1,631,941	900,000	15%
WEST	3,762,199	3,000,000	50%
SOUTH	2,208,735	1,350,000	23%
EAST	4,293,885	750,000	12%
TOTAL	11,896,760	6,000,000	100%

[2934](#). Central Campus. Approximately 15 percent of the Growth Allowance, or 900,000 net new gross square feet of development, is allocated to Central Campus, for which there are 18 identified development sites, with a total net new development capacity of 1,631,941 gross square feet.^{[2941](#)} Potential uses could include academic, mixed-use, transportation, and housing.^{[3042](#)} Just over 1.1 million gross square feet would be demolished to accommodate full development within this sector.^{[3443](#)}

[3035](#). West Campus. Approximately 50 percent of the Growth Allowance, or 3 million net new gross square feet of development, is allocated to West Campus, for which there are 19 identified development sites, with a total net new development capacity of 3,762,199 gross square feet.^{[3244](#)} Potential uses could include academic, mixed-use, transportation, and industry partnership/manufacturing.^{[3345](#)} Approximately 800,000 gross square feet would be demolished to accommodate full development within this sector.^{[3446](#)}

[3136](#). South Campus. Approximately 23 percent of the Growth Allowance, or 1.35 million net new gross square feet of development, is allocated to South Campus, for which there are 20 identified development sites, with the total net new development capacity of 2,208,735 gross square feet.^{[3547](#)} Potential uses could include academic, mixed-use, and transportation.^{[3648](#)} Approximately 2.8 million gross square feet would be demolished to accommodate full development within this sector.^{[3749](#)}

[3237](#). East Campus. Approximately 12 percent of the Growth Allowance, or 750,000 net new gross square feet of development, is allocated to East Campus, for which there are 29 identified development sites, with a total net new development capacity of 4,293,885 gross square feet.^{[3850](#)} Potential uses could include academic, mixed-use, industry partnership/manufacturing, academic

^{[2941](#)} *Id.* at 162-163.

^{[3042](#)} *Id.* at 164.

^{[3443](#)} *Id.*

^{[3244](#)} *Id.* at 186-188.

^{[3345](#)} *Id.* at 188.

^{[3446](#)} *Id.*

^{[3547](#)} *Id.* at 203-204.

^{[3648](#)} *Id.* at 204.

^{[3749](#)} *Id.*

^{[3850](#)} *Id.* at 217-218

conference center, and transportation.³⁹⁵¹ Approximately 360,000 gross square feet would be demolished to accommodate full development within this sector.⁴⁰⁵²

Proposed MIO Height District Changes

3338. Master Plan Figure 111, at page 123, illustrates the building heights requested within the MIO Height Districts.⁴⁴⁵³ The existing Central Campus sector height of 105 feet would be maintained. Within the West Campus sector, current mapped height limits of 37 – 105 feet would change to 37 – 240 feet, and heights would increase throughout most of the sector. Within the South Campus sector, current mapped height limits of 37 - 240 feet would be maintained, and heights would increase throughout most of the sector. Within the East Campus sector, current mapped height limits of 37 – 160 feet would be maintained, but the mapped height at the E1 parking lot would increase from 37 feet to a range of 65 – 160 feet.

3439. The proposals for increased height limits include self-imposed conditions reducing maximum building heights for some specific development sites. All sites within the Shoreline District would be limited to 30 feet in height to comply with the City’s Shoreline Master Program.

3540. The Master Plan and EIS point out that the increased height would reduce the number of potential development sites needed for building space, thereby allowing for the development of new open space areas.⁴²⁵⁴

3641. The University’s requests for changes to MIO Height Districts were processed as rezones ~~per Code requirements~~.⁵⁵ The Director’s Report includes an evaluation of the rezone requests pursuant to the rezone criteria found in SMC 23.23.008, and the criteria found in SMC 23.34.124, “Designation of Major Institution Overlay Districts.”⁴³⁵⁶ The analysis is complete and accurate, and is therefore adopted by reference.

3742. The Master Plan also identifies “Development Areas,” which indicate responsibility for development of landscape and the public realm improvements connected with development of individual sites. Figure 113, at page 127, shows the general development area associated with each identified development site for purposes of project design and planning.

Open Space

³⁹⁵¹ *Id.* at 218.

⁴⁰⁵² *Id.*

⁴¹⁵³ Figure 59, on page 73 of the Master Plan, illustrates the existing MIO Height Districts on campus.

⁴²⁵⁴ See, e.g., Exhibit A19 at 3.6-54 to 3.6-56.

⁵⁵ The University submitted a rezone application without waiving any rights. Exhibits D6, D7, and A21.

⁴³⁵⁶ Exhibit D1 at 39-59. The EIS includes a related discussion. Exhibit A19 at 3.6-49 to 3.6-72.

[3843](#). The Master Plan proposes new and enhanced open spaces within the West, South, and East Campus sectors, including a continuous waterfront trail. An approximately four-acre park, called the “West Campus Green,” and the West Campus section of the waterfront trail, would be constructed within the West Campus.^{[4457](#)} Within the South Campus, a four-acre open space, called the “Upper South Campus Green,” and the “South Campus Green,” as well as the South Campus section of the waterfront trail, would be constructed.^{[4558](#)} A section of the waterfront trail also would be constructed within the East Campus.

[3944](#). The Master Plan identifies a schedule for completion of the proposed open spaces, but the Department recommended conditions that would impose a more accelerated schedule. The University and the Department ~~have since~~ agreed on an alternative schedule for completion of the open space commitments, which is included within the ~~recommended conditions at the end of this document~~.

Design Guidelines and Development Standards

[4045](#). Both design guidelines, which are discretionary, and development standards, which are mandatory, are identified in the Master Plan. Some design guidelines apply campus-wide, and others are specific to each campus sector.^{[4659](#)} Design standards apply campus-wide^{[4760](#)} and address requirements for such features as podium heights, ground and upper-level setbacks, and tower separations.

Transportation Management Plan

[4146](#). The Master Plan proposes to maintain parts of the University’s existing Transportation Management Plan (“TMP”) and modify others.

[4247](#). Trip Caps. Under the City-University Agreement, the maximum allowable number of University-generated weekday AM peak period (7AM-9AM) vehicle trips to campus, and weekday PM peak period (3 PM-6 PM) trips from campus, were capped at 1990 levels unless revised in a new master plan. The Master Plan retains the trip caps at 7,900 during the AM peak period and 8,500 during the PM peak period.^{[4861](#)}

⁴⁴⁵⁷ See Exhibit D2 at 98-102.

⁴⁵⁵⁸ See *id.* at 102.

⁴⁶⁵⁹ Exhibit D2. at 156-227.

⁴⁷⁶⁰ *Id.* at 232-253.

⁴⁸⁶¹ These are addressed in Exhibit A19, Appendix D at 1-1.

4348. Parking Cap. The ~~TMP Master Plan proposes to retain~~ the cap on on-campus parking at 12,300 spaces, as established in 1990.⁴⁹⁶²

4449. Under SMC Chapter 23.54, off-street parking is not required in urban centers. Most of the University of Washington Campus is within the University Urban Center, except for portions of the East Campus. Portions of the East Campus that are not within the Urban Center are classified as being within a Frequent Transit Service area where frequent transit is readily ~~accessible~~.⁵⁰
accessible.⁵⁰⁶³

4550. On-campus parking is underutilized, with the University's existing population, because as only 63% peak hour occupancy of those spaces that are subject to the cap.⁵⁴ However, parking at the south, west and central campus is heavily used.⁶⁴ Further, with the population growth in the Master Plan, the parking demand is expected to increase.⁶⁵ The Master Plan notes that demand for parking is strong when small parking facilities are located next to buildings.⁵²⁶⁶ The Master Plan proposes to close East Campus surface parking lots and build more parking with the development of the west and south campuses.

4651. The Master Plan notes that “parking resources are managed holistically on a campus-wide basis.”⁵³⁶⁷

4752. Single Occupancy Vehicle (“SOV”) Rate. The TMP states that its primary goal is to reach an overall 15 percent SOV rate by 2028. In 2015, the overall University SOV rate was 20 percent. However, the mode split was surveyed again in 2016, and the SOV rate was shown to have dropped to 17 percent.⁵⁴⁶⁸ The Campus Master Plan indicates that the drop is timed to the opening of the Husky Stadium light rail station.⁵⁵⁶⁹ Testimony at the Hearing Examiner hearing ascribed the change to a very low student SOV rate (approximately 8 percent)⁵⁶⁷⁰ that is generally attributable to the University’s “U-Pass” program, which is heavily subsidized for students.⁵⁷¹ The program adds a transit pass to a University member’s Husky card. The Department’s Transportation Planner further testified at the City Council Hearing that “A decrease from 17% to 15% doesn’t seem great, but two

⁴⁹⁶² Exhibit D2 at 260.

⁵⁰ ~~Seattle Department of Construction and Inspections Director’s Rule 15-2018, “Frequent Transit Service Area Map”~~

⁶³ ~~Seattle Department of Construction and Inspections Director’s Rule 15-2018, “Frequent Transit Service Area Map”~~

⁵⁴ ~~Exhibit A19, Appendix D, “Transportation Discipline Report”, pages 3-82 and 3-84~~

⁶⁴ ~~Exhibit A19, Appendix D, “Transportation Discipline Report”, pages 3-82 and 3-84~~

⁶⁵ ~~Id., pages 5-37 to 5-40.~~

⁵²⁶⁶ Exhibit D2, page 68

⁵³⁶⁷ Exhibit D2, page 265

⁵⁴⁶⁸ Exhibit A19, Appendix D at 2-11; Exhibit D2 at 265, Figures 194 and 195.

⁵⁵⁶⁹ Exhibit D2, page 51

⁵⁶⁷⁰ See Exhibit A19, Appendix D at 3-3, Table 3.2.

⁵⁷¹ See Exhibit D2 at 264, Table 21; Exhibit A19, Appendix D at 1-2.

factors need to be kept in mind. One is that mathematically going from 17% to 15% is still a 10 to 15% reduction in SOV trips; it is not simply a 2% reduction...but probably, the more important point is that those trips as you get closer and closer to a very low number may be the trips that are hardest to shift out of auto modes, it's not saying that a good effort shouldn't be made, but it isn't likely to be as easy to get the last 15% of any population than it would be to shift from a higher number to a lower number if there was a higher SOV rate at the outset."

4853. The TDR notes that the share of employees who live within a quarter mile of a light rail station will more than double between the current day and 2024 when a second light rail station serving the University has opened, and light rail has been extended north to Northgate and Lynnwood, south to Federal Way, and east to Overlake and Redmond. The share of employees who are anticipated to live in zip codes adjacent to a light rail station is anticipated to increase from 24% to 59% over this time.⁵⁸⁷² The Housing analysis in the FEIS indicates that when "transit access to campus is improved in the near future (and the very recent past) it is anticipated that shares of students choosing to live in neighborhoods with improved transit access will increase."⁵⁹⁷³

Vacations and Skybridges

4954. The Master Plan does not propose any new skybridges. It discusses a potential future vacation of NE Northlake Place, east of 8th Avenue NE, for disclosure purposes only. The University has not filed a street vacation petition for it.

Draft Shoreline Public Access Plan

5055. The University has included a proposed Shoreline Public Access Plan in the Master Plan, which is intended to reflect a coordinated approach to public access for the University's 12,000+ linear feet of shoreline.⁶⁰⁷⁴ It is not required as part of the Master Plan and would take effect if adopted pursuant to the City's Shoreline Master Program Regulations.

REVIEW AND PUBLIC PROCESS

5156. As the SEPA lead agency for its Master Plan,⁶⁴⁷⁵ the University was responsible for preparation of the EIS that evaluated the Plan's environmental impacts.⁶²⁷⁶ The EIS studied the "no action" alternative and five "action" alternatives that were each designed to meet the Master Plan's

⁵⁸⁷² *Id.*, page 2-9

⁵⁹⁷³ Exhibit A19, page 3.8-32

⁶⁰⁷⁴ Exhibit D2 at 108-111.

⁶⁴⁷⁵ WAC 197-11-926; WAC 197-11-050. In addition, the City-University Agreement required the University to prepare an EIS for the Master Plan, including alternative proposals. Exhibit D5, §II.A.1.

⁶²⁷⁶ Exhibit A19.

objective of six million net new gross square feet. Alternative 1 in the EIS is the preferred alternative.

5357. SMC 25.05.660 authorizes the City to require mitigation of adverse environmental impacts identified in an environmental document. The mitigation must be based on the City's policies, plans and regulations designated in SMC 25.05.665 through SMC 25.05.675 (SEPA Overview Policy, SEPA Cumulative Effects Policy, and topic-specific SEPA Policies).

5358. The Director analyzed the Master Plan's short-term and long-term adverse impacts, as disclosed in the EIS and related technical support documents, as well as any proposed mitigation measures.⁶³⁷⁷ The Director's SEPA analysis is accurate and complete and is therefore adopted by reference, except as modified below. The Director recommended numerous conditions to mitigate disclosed adverse environmental impacts. The University ~~has~~ agreed to most of the recommended SEPA conditions. Those that are disputed are discussed below.

5459. The Master Plan includes a public participation plan, which describes the various aspects of the University's multi-year, public engagement process for the Plan.⁶⁴⁷⁸

5560. The University published the Draft Master Plan and draft EIS on October 5, 2016. A public meeting on the draft EIS was held on October 26, 2016, and the public comment period on the draft EIS ran from October 5, 2016 through November 21, 2016. The final Master Plan and final EIS were published on July 5, 2017.

5661. The CUCAC held nine meetings, open to the public, to discuss the draft and final Master Plan and submitted comments on the draft Master Plan and draft EIS. The Department's public comment period began on December 5, 2016. The CUCAC provided its final report on the Master Plan on August 30, 2017.⁶⁵⁷⁹ The University responded to the CUCAC's recommendations on September 14, 2017.⁶⁶⁸⁰

5762. At the Examiner's hearing, two representatives of the CUCAC ~~presented testimony~~ testified on the CUCAC's work and recommendations. Eleven members of the public also testified at the hearing, and the Examiner allocated an extended period of time for testimony from representatives of the U-District Alliance for Equity and Livability, a coalition of many organizations with an interest in the University and the University District. The Examiner also received numerous written public comments, including the written statements of some of those who testified, and these were combined into one exhibit, Exhibit P1.

⁶³⁷⁷ Exhibit D1 at 68-95.

⁶⁴⁷⁸ Exhibit D2 at 280-285.

⁶⁵⁷⁹ Exhibit D3.

⁶⁶⁸⁰ Exhibit A20.

5863. The CUCAC's report included 33 recommendations for changes to the Master Plan, all of which ~~are~~ were addressed in the Director's Report.⁶⁷⁸¹ Some of the CUCAC recommendations ~~are~~ were incorporated within the Director's recommended conditions. Others were determined to be inconsistent with the City-University Agreement,⁶⁸⁸² or beyond the scope of the review associated with the Master Plan application,⁶⁹⁸³ or were rejected by the Director for other reasons explained in the Director's Report.

5964. At the Examiner's hearing, the CUCAC representatives reiterated the CUCAC's recommendation that the TMP be revised to require a reduction in the University's overall SOV rate to 12% over the lifetime of the Master Plan in light of the expected increase in the availability of light rail during that time period.

6065. The CUCAC representatives also focused on concerns about increased heights in two specific locations on the campus. Site W22, which is west of Condon Hall, is considered by residents to be part of the gateway to the neighborhood. The proposed MIO height at that location is 240 feet, ~~but a newer multifamily residential building across the street is 65 feet high~~ the same height allowed under adjacent zoning outside the MIO. The CUCAC recommendeds that site W22 be conditioned to 165 feet in height. Site W37 is directly west of the University Bridge, where the proposed MIO height is 160 feet conditioned to 130 feet. The University presented an exhibit at the Hearing Examiner hearing that shows this proposed height -is comparable to adjacent zoning outside the MIO when grade changes are considered.⁸⁴ The CUCAC states that the proposed height for W37 is inconsistent with adjacent zoning and recommendeds that the height be reduced to protect views from the north end of the University Bridge.

6166. A consistent theme in public comments wasis that the TMP should be revised to reduce the University's overall SOV goal from 15 percent to 12 percent to mitigate the 6,195 new SOV trips forecast under the Master Plan. As noted, the Master Plan proposed achieving a 15 percent SOV rate by 2028 even though the present SOV rate is 17%. Based on SOV rates achieved by other Major Institutions, the Director supported the 15% SOV goal but recommended a condition that would require it to be achieved by January 1, 2024, approximately one year after the scheduled opening of Link light rail service to Lynnwood.

6267. After reviewing the proposed modifications to MIO height districts in the West, South, and East Campus in accordance with the applicable rezone criteria, the Director recommended

⁶⁷⁸¹ Exhibit D1 at 10-17.

⁶⁸⁸² E.g., requirements that the University create a plan to integrate small businesses into the footprint of the ~~physical expansion-physicalexpansion~~ area, and requirements relating to increasing childcare.

⁶⁹⁸³ E.g., a requirement that the City partner with the University to address the need for affordable housing.

⁸⁴ Exhibit A33.

conditional approval of them, with the exception of sites W19, and W20, which are located along University Way north of Campus Parkway. The Director determined that because of their adjacency at the MIO boundary to NC3-65 zoning, those two sites should maintain the existing MIO 105 height. The Director recommended conditional approval of the Master Plan.⁷⁰⁸⁵

AREAS OF DISPUTE

~~6368~~. As noted above, the Director and the University ~~have~~ reached agreement on numerous conditions that would modify the proposed Master Plan. The areas listed below, and the related recommended conditions, ~~are still remained~~ in dispute and are addressed at greater length in the Conclusions which follow.

Authority for Master Plan to Modify City Development Regulations

~~6469~~. The Director and the University ~~disagree-disagreed~~ on the extent to which applicable law allows the Master Plan to modify or supersede City development regulations. (~~Recommended~~ Conditions ~~2935, 3036, 3440, 3541, and 3946~~)

Public Realm Allowance

~~6570~~. The Master Plan includes a “public realm allowance” that would provide space for “rights-of-way, streetscapes, sidewalks, street lighting, street furniture, bioswales, pedestrian paths, trails, courtyards, plazas, parks, landscapes, skybridges and pedestrian bridges, and accessible open spaces.”⁷⁴⁸⁶ The Plan states that the “public realm allowances proposed are based upon and maintain the current street widths which the University understands to be sufficient.”⁷²⁸⁷ The Director ~~recommends-recommended~~ that this sentence be deleted and replaced with the following: “City of Seattle right-of-way widths are determined by SMC 23.53, and the Street Improvement Manual, or functional successor. Where required, improvements to the public realm allowance shall be completed in accordance with adopted Green Street Concept Plan.” (Recommended Condition ~~4216~~)
The University ~~objects-objected~~ to this revision.

Plan Amendment Process/Portability of Development Capacity

~~6671~~. The Master Plan’s chapter on Development Standards includes language stating that a proposal for a new development site constitutes an exempt plan change in most circumstances, and other language addressing the University’s movement of gross square footage between campus

⁷⁰⁸⁵ Exhibit D1 at 96.

⁷⁴⁸⁶ Exhibit D2 at 242.

⁷²⁸⁷ *Id.*

sectors.⁷³⁸⁸ The Director ~~recommends~~recommended that most of the language be removed and replaced with the following sentence: “A new development site: A proposal for a development site not previously approved under the Master Plan is considered a proposed change to the Master Plan and will comply with the City-University Agreement Section II.C.1-5, Changes to University Master Plan.” (~~Recommended~~Conditions 17-21 and 1822)-. The University ~~objects~~objected to this revision.

Housing

~~6772~~. The Master Plan’s housing chapter⁷⁴⁸⁹ restates the University’s “Student Housing Statement of Principles,” originally adopted in 1978, which provides direction for University decision-making related to providing student housing: “the primary source for student housing continues to be the off-campus private housing market.”⁷⁵⁹⁰ As of 2015, approximately 80% of students lived off campus.

~~6873~~. The University currently has capacity to house approximately 9,517 students on campus.⁷⁶⁹¹ With the completion of a student housing project on the North Campus, the University expects to increase that number to 10,870 students and has a goal of housing an additional 1,000 students during the life of the Master Plan.⁷⁷⁹² In addition, the University recently completed a housing project with Seattle Children’s Hospital, for faculty and staff, that includes 184 apartments, with 37 units priced to be affordable to those making 65% to 85% of area median income. The project, called “Bridges@11th,” is fully rented.⁷⁸⁹³ The University also has announced a partnership with the Seattle Housing Authority to develop at least 150 units of income-restricted housing on property owned by the University outside the MIO District, but within the City’s University District. The housing would be available to University faculty and staff earning less than 60% of the area median income.⁷⁹⁹⁴

~~6974~~. The Master Plan does not propose demolition of any existing off-campus housing⁹⁵⁻⁸⁰

~~7075~~. In the Fall of 2014, the University’s campus population was approximately 67,155 students, faculty and staff.⁸¹⁹⁶ Based on historic trends, the Master Plan anticipates an increase in the

⁷³⁸⁸ *Id.* at 232-233.

⁷⁴⁸⁹ Exhibit D2 at 272-277. *See, also*, Exhibit A19, Chap. 3.8.

⁷⁵⁹⁰ Exhibit D2. at 272.

⁷⁶⁹¹ *Id.* at 272-274.

⁷⁷⁹² *Id.* at 274.

⁷⁸⁹³ *Id.* at 276.

⁷⁹⁹⁴ Exhibit D14.

⁹⁵ Exhibit A19 at 3.8-35.

~~⁸⁰ Exhibit A19 at 3.8-35.~~

~~⁸¹⁹⁶ Exhibit A19 at 3.7-1~~

University’s population of 20% between 2014 and 2028.⁸²⁹⁷ Between 2014 and 2028, the University forecasts a student population of approximately 52,399 (an increase of 8,675 FTE students), a faculty population of approximately 8,517, (an increase of 1,410 FTE faculty), and a staff population of approximately 19,563 (an increase of 3,239 FTE staff). Between 2018 and 2028, the University forecasts an increase of 5,180 students, 842 faculty, and 1,934 staff. “In total, the on-campus population under the 2018 ... Master Plan would increase to approximately 80,479 people (an increase of 13,324 over 2015 conditions.)”⁸³⁹⁸ The EIS acknowledges that the increase in campus population would lead to an increase in the demand for housing and various public services.⁸⁴⁹⁹

7176. Generally, increased housing demand has the potential to displace low-income households, which find it difficult to compete in an increasingly competitive housing market. The EIS concludes that student, faculty, and staff housing demand impacts on off-campus housing can be accommodated by zoned capacity and anticipated housing growth within the University District, as well as overall housing supply in the Primary and Secondary Impacts Zones, and that additional housing supply is available beyond those zones.⁸⁵¹⁰⁰ The EIS also analyzed housing impacts based on the impacts of recent and anticipated investments in transit that are expected to provide increased commuting choices from areas with currently lower cost housing options. Finally, the EIS concluded that development capacity and anticipated growth, and City initiatives, such as the Mandatory Housing Affordability program, have accounted for the impact of increased housing demand on housing affordability.⁸⁶¹⁰¹ However, City planning documents conclude that current and anticipated City regulations will not fully mitigate the affordable housing impacts of anticipated growth.⁸⁷¹⁰²

7277. The Director analyzed the Master Plan’s “[c]onsistency ... with the objectives of the City’s Major Institutions Policy, SEPA, and other adopted land use policies and regulations.”⁸⁸¹⁰³ The City’s SEPA policies on housing are limited to minimizing impacts on the demolition, rehabilitation or conversion of existing low-rent housing units and minimizing the direct impacts of new commercial development.⁸⁹¹⁰⁴ The Director found no SEPA authority to impose conditions to mitigate the housing impacts of new institutional development.⁹⁰¹⁰⁵ However, the Director identified Comprehensive Plan policy H5.19, which reads as follows: “Consider requiring provisions for housing, including rent/income-restricted housing, as part of major institution master plans and development agreements when such plans would lead to housing demolition or employment growth.”” (emphasis added). Comprehensive Plan policy H5.19 was adopted in 2016.

⁸²⁹⁷ Exhibit D2 at 30.

⁸³⁹⁸ Exhibit A19 at 3.7-9.

⁸⁴⁹⁹ *Id.* at 3.7-10.

⁸⁵¹⁰⁰ Exhibit A19 at 3.8-26 - 3.8-36.

⁸⁶¹⁰¹ *Id.* at 3.8-35 – 3.8-36.

⁸⁷¹⁰² Exhibit 25 §3.1.4; Exhibit 26 at 3.1-20; and Exhibit 27 §3.6.3 and § 3.6.4.

⁸⁸¹⁰³ Exhibit D5 at 5.

⁸⁹¹⁰⁴ SMC 25.05.675.I.

⁹⁰¹⁰⁵ Exhibit D1 at 76.

7378. The Director concluded that the Master Plan was not consistent with Policy H5.19, in that the Master Plan anticipates an increase of approximately 4,649, faculty and staff over its 10-year life, but does not provide for housing, including rent- or income-restricted housing, to accommodate that employment growth. The Director therefore ~~recommends~~ recommended that the Master Plan be amended to require that the University construct 150 affordable housing units within the MIO boundary, Primary Impact Zone, or Secondary Impact Zone, for faculty and staff earning less than 60% AMI.⁹⁴¹⁰⁶ (~~Recommended~~ Conditions 1 and 2) Although the University ~~has~~ publicly committed to such a project in partnership with the Seattle Housing Authority, it ~~opposes~~ opposed this requirement on the basis the City lacks authority to impose the Conditions.

Transportation

7479. The transportation analysis in the EIS reviewed the Master Plan's transportation impacts assuming full buildout of six million net new gross square feet, a 20% SOV mode split, existing and future background traffic volumes, and planned and funded transportation improvements.⁹²¹⁰⁷

7580. The Director determined from the EIS that campus growth is expected to result in 17,541 new daily trips to and from the campus. Approximately 10,000 of the trips would be expected to use transit.⁹³¹⁰⁸ A key aspect of transit performance is the carrying capacity of buses relative to demand.⁹⁴¹⁰⁹ The EIS evaluated transit loads (the number of passengers in all buses passing a specific location, or "screenline") across 11 screenlines in the University District. With additional transit ridership resulting from University growth, bus transit demand is expected to increase by 26 percent, and overall bus loads would increase from 41 percent to 51 percent.

7681. The set of transfer routes serving Campus Parkway east of Brooklyn Avenue is forecast to have an overall demand to capacity ratio of 96%, compared to 82% in the no action alternative, as a result of 164 additional riders. The Director determined that because overall transit load is just slightly under 100 percent, reflecting both seated and standing passengers, it is reasonable to assume that the increased demand would cause some of the routes on the screenline to exceed capacity. The 164 additional riders were determined to be approximately equivalent to the capacity of three articulated Metro bus coaches. Therefore, the Director ~~recommends~~ recommended that the University pay King County-Metro the operating costs for three additional bus transit coaches in both the AM and PM peak hours to provide additional capacity on routes serving Campus Parkway near Brooklyn Avenue NE.⁹⁵¹¹⁰ (~~Recommended~~ Condition ~~5158~~) The University ~~opposes~~ this

⁹⁴¹⁰⁶ Exhibit D1 at 24.

⁹²¹⁰⁷ See Exhibit A19, chapter 3.16 and Appendix D.

⁹³¹⁰⁸ Exhibit A19 at 3.16-38, Table 3.16-11.

⁹⁴¹⁰⁹ Testimony of John Shaw, SDCI Senior Transportation Planner.

⁹⁵¹¹⁰ Exhibit D1 at 85-86; Testimony of John Shaw. See also, Exhibit D17.

requirementopposed this requirement because the Condition language was not tied to a trigger based on exceedance of the demand to capacity ratio. The University has since agreed to this Condition with modifications that are reflected in the language in the attachment.

7782. The EIS documents travel speeds on 11 corridors used by transit vehicles. Existing transit speeds range from 20 MPH on northbound Montlake Boulevard to 2.7 MPH on westbound Stevens Way NE. Transit speeds would decrease on almost all corridors under nearly all alternatives, which the Director determined would likely reduce transit reliability and thus, its desirability and the likely success of the University's TMP.⁹⁶¹¹¹

7883. SDOT anticipates that planned RapidRide investments will improve transit speed and reliability through a combination of dedicated bus-only lanes, enhanced stations, improved fare collection technology, specialized vehicles, and enhanced traffic signals. Three Rapid Ride corridors are planned in the University District: 11th Avenue NE/Roosevelt Way NE; NE 45th Street/15th Avenue NE/NE Pacific Street; and Montlake Blvd NE. In the Primary Impact Zone, the EIS projects that UW growth from the Campus Master Plan would result in an 11% reduction in transit travel speeds on the 11thAvenue NE/Roosevelt Way corridor, a 30% reduction on the NE 45th Street/15th Avenue NE/NE Pacific Street corridor, and a 25% reduction on the Montlake Boulevard NE corridor based on congestion. The EIS analyzed traffic volumes in the Secondary Impact Zone.⁹⁷¹¹² It did not analyze transit speed impacts in that zone, but does identify substantial adverse impacts to intersection operations there. The Director determined that this indicates that congestion-related impacts to transit speeds would also occur in that zone. The EIS does not identify mitigation to reduce the Master Plan's impacts on transit travel speed.⁹⁸¹¹³

7984. Based on the reductions in transit travel speeds attributable to the University's growth, the Director recommendeds that the University fund SDOT capital improvements to facilitate transit performance within the Primary and Secondary Impact Zones at the time the respective Rapid Ride projects are implemented for the 11th Avenue NE/Roosevelt Way NE; NE 45th Street/15th Avenue NE/NE Pacific Street; and Montlake Blvd NE corridors. Within the Primary Impact Zone, the Director's recommendation was that University's contribution to each project would be equal to the percentage reduction in transit travel speed attributable to the growth under the Master Plan. Although impacts on transit speeds within the Secondary Impact Zone were not analyzed in the EIS, the Director determined that they would likely be less than those in the Primary Impact Zone and recommendeds reducing the required contributions there to half of the percentages required in the Primary Impact Zone.⁹⁹¹¹⁴ (~~Recommended~~ Condition 5259). The University ~~opposes~~ opposed these

⁹⁶¹¹¹ Testimony of John Shaw.

⁹⁷¹¹² Exhibit A19 at 5-23 – 5-24.

⁹⁸¹¹³ Exhibit D1 at 87.

⁹⁹¹¹⁴ Exhibit D1 at 87-88; testimony of John Shaw.

requirements on several grounds, including on the basis that the reduction in transit speeds is not the right metric to assess the funding contribution.

~~8085~~. Noting that the University expects that transit will need to accommodate the majority of new trips generated by the Master Plan, the Director ~~recommends~~ recommended that the University “dedicate space at new development adjacent to existing and future Link light rail stations and RapidRide stops to better accommodate higher volumes of transit riders, provide better connections between modes, accommodate shared mobility services, and provide transportation information related to travel and transfer options.”⁴⁰⁰¹¹⁵ (~~Recommended~~ Condition ~~5360~~) The University ~~opposes~~ opposed this requirement, but has since agreed to it subject to the SOV rate goal remaining at 15%.

~~8186~~. Concerning pedestrian operations, the EIS evaluated capacities for transit riders at bus stops. With some exceptions, space available for pedestrians at transit stops is projected to remain adequate to meet both background growth and that attributable to the Master Plan. However, the transit stop at 15th Avenue NE/NE 42nd Street is forecast to operate at LOS D (characterized by severely restricted circulation and long-term waiting discomfort), and the stop at NE Pacific Street/15th Avenue NE is forecast to operate at LOS F (indicating extremely discomforting density and no possible movement). The Director therefore ~~recommends~~ recommended that the University expand transit stops, or pay SDOT for transit stop expansion, at these two stops as part of the NE 45th Street/15th Avenue NE/NE Pacific Street RapidRide implementation.⁴⁰¹¹¹⁶ (~~Recommended~~ Condition ~~5462~~) The University ~~opposes~~ opposed this requirement, but has since agreed to it.

⁴⁰⁰¹¹⁵ Exhibit D1 at 89.

⁴⁰¹¹¹⁶ *Id.* at 90.

Attachment 2

Seattle City Council Conclusions Related to the University of Washington 2018 Seattle Campus Master Plan

The City Council intends to adopt the following conclusions regarding Clerk File 314346, as promulgated by the Seattle Hearing Examiner on January 17, 2018 and as amended by the Council.

Conclusions

1. The Seattle City Council has jurisdiction over this matter pursuant to Chapters 23.69 ~~and 23.76 SMC~~, and ~~as reflected in~~ the City-University Agreement. All conditions of approval of the Master Plan are established pursuant to the City’s exercise of substantive SEPA authority, but that authority is supplemental to the land use authority described above.
2. The review process for development of the Master Plan met the process requirements in Section II.B of the City-University Agreement.

Areas of Dispute

3. Authority for Master Plan to Modify City Development Regulations. The University maintains that the City-University Agreement is “*the* development regulation governing the University’s land use activities on campus,”¹ and that the Agreement allows the Master Plan to modify all City development regulations, not just the development standards of the underlying zoning. This position fails to take into account the entirety of the legal framework for the Master Plan.
4. The statutory framework for the Master Plan begins with SMC 23.69.006, which includes two sentences that must be read together and harmonized.² The first sentence authorizes the Agreement to govern such things as the uses on campus and outside the campus boundary, permit acquisition and conditioning, and zoning and environmental review authority. The second sentence then states that within the MIO Boundaries, “development standards of the underlying zoning may be modified by an adopted master plan” or an amendment to the Agreement.³
5. The “development standards of the underlying zoning” are the limitations on physical development applied within each zone, such as height, floor area ratios, and setbacks, that ensure

¹ The University cites the GMA Board’s decision in *Laurelhurst II* as support for its position, but the Board’s conclusion in that case was that the Agreement “has the effect of being a local land use regulation” and thus, qualified as a development regulation as that term is defined in the GMA. *Laurelhurst II* at 11.

² A statute or code must be construed to give effect to all the language used, *Danley v. Cooper*, 62 Wn.2d 179, 381 P.2d 747 (1963), and to give effect to each word if possible. *Chelan Cy. V. Fellers*, 65 Wn.2d 943, 400 P.2d 609 (1965).

³ Emphasis added.

compatibility of development patterns within the zone.⁴ The language in the first sentence of SMC 23.69.006.B, authorizing the City-University Agreement to govern “zoning ... authority,” does not authorize the Agreement to supersede development regulations other than zoning. Zoning is a mapping exercise subject to Chapters 23.30 through 23.34 SMC, which establish zone designations, adopt a map depicting underlying zoning, and govern mapping amendments. It does not include other development regulations, such as the uses allowed within the zone; development standards for height, bulk, and scale; subdivision regulations; critical area regulations; historic preservation ordinances; etc. If zoning encompassed all development regulations, there would be no need for the same sentence to expressly authorize the Agreement to govern “uses” within and outside campus boundaries, or “permit acquisition and conditioning,” or for the second sentence of SMC 23.69.006.B to authorize the Agreement to “modify development standards of the underlying zoning”.⁵

6. The University’s reading of the Agreement conflicts with SMC 23.69.006.B. The University argues that the Agreement’s requirement that the Master Plan include the “institutional zone and development standards” to be used by the University” means that the Master Plan may designate the institutional zone and supersede all City “development regulations.” However if, as the GMA Board held, the Agreement is itself a land use regulation, codified as part of SMC 23.69.006.B, it must be read together with that Code section. Reading the two together, and harmonizing them, the Agreement requires that the Master Plan include the institutional zone and any modified development standards of the underlying zoning. It does not authorize the Master Plan to modify any other City development regulations.

7. Finally, the University’s reading of the Agreement’s requirement for the Master Plan to include “the institutional zone and development standards” to be used by the University, would create a conflict within the Agreement itself. The Agreement requires that the Department and the Examiner each base their recommendations on the Master Plan, in part, on “other applicable land use policies and regulations.”⁶ But under the University’s reading of the Agreement, there would be no “other applicable land use ... regulations” for the Department and Examiner to assess. Again, reading the Agreement as a whole and giving effect to all of its provisions, and reading it together with SMC 23.69.006.B, the Master Plan must include the institutional zone and any modified development standards of the underlying zoning.

8. As proposed, the Master Plan would control all development regulations, including those not tailored to a zone. The Examiner ~~recommends~~recommended adoption of the Director’s recommended conditions, 3529, 360, 4034, 4135, and 4639. Those recommended conditions better align the Master Plan with the SMC but also include language that is consistent with the Washington Supreme Court’s recent ruling, which bars local jurisdictions from using development

⁴ The Master Plan depicts the zoning underlying the University's MIO at 290-91 The development standards for that zoning are found in SMC Chapters 23.43 through 21.51B, SMC 23.54.016.B, and SMC 23.54.030.

⁵ See also SMC 23.69.002.H.

⁵ See also SMC 23.69.002.H.

⁶ Exhibit D5 at 6.

regulations to preclude the siting of state education facilities. Recommended condition ~~4639~~ would add a common-sense rule to address potential conflicts between definitions in the Master Plan and those in the SMC. Terms undefined in the Master Plan would default to definitions found in the SMC.

9. Public Realm Allowance. The Master Plan cannot control future City decisions regarding City rights-of-way. The University ~~is concerned~~ expressed concern that recommended Conditions ~~162~~, which would acknowledge that the City is authorized to widen its rights-of-way, could impact the potential development capacity of the Master Plan. Although the concern is understandable, the City cannot, in the Master Plan process, appear to abdicate its authority to manage and, where necessary, expand City rights-of-way. If an expansion that reduced the University’s development capacity were proposed, the University and City could explore a Master Plan amendment to adjust public realm allowance requirements to the University’s needs. Further, the City cannot implement development regulations that preclude the siting of an essential public facility.

10. The University also argues that the following sentence in recommended Condition ~~162~~ should be removed as unnecessary: “Where required, improvements to the public realm allowance shall be completed in accordance with adopted [the] Greenstreet Concept Plan.” The Master Plan includes a statement of intent that the University “shall strive to follow the guidance provided” in the University District Green Street’s Concept Plan,⁷ but recommended Conditions ~~162~~ would mandate what is now written as discretionary.

11. The Examiner recommended adoption of ~~the Director’s recommended~~ Condition ~~162~~.

12. Plan Amendment Process/ Portability of Development Capacity. Under SMC 23.69.006.B, the Agreement is to govern “the Master Plan process (formulation, approval and amendment).” Subsection II.C of the Agreement addresses changes to the Master Plan, with provisions defining exempt changes and addressing procedures for amendments that are not exempt. As noted above, language Language proposed in the Master Plan’s chapter on Development Standards ~~includes~~ included procedures that conflict with those spelled out in the Agreement. The University ~~states~~ stated that the City Council which approved the existing master plan added the provisions that the University included in the proposed Master Plan. Nonetheless, nothing in the record explains the reason such provisions would have been added, and the Master Plan should be consistent with the Code and Agreement. The Examiner ~~recommends recommended~~ adoption of recommended Conditions ~~2017~~ and ~~2118~~.

13. Housing. As noted above, the Director concluded that the Master Plan was not consistent with Comprehensive Plan Policy H5.19 because it would lead to an increase of approximately 4,649 faculty and staff over its 10-year life without providing for housing, including rent- or income-restricted housing, to accommodate that employment growth. The University ~~argues~~ argued that the Master Plan is a specific development proposal and thus, need not be consistent

⁷ Exhibit D2 at 182.

with the Comprehensive Plan, but the City asserts that because the Master Plan is a nonproject action for purposes of SEPA, it is regulatory in nature and must comply with the Comprehensive Plan. As noted above, in *Laurelhurst I*, the City and University argued, and the GMA Board agreed, that a University master plan is properly characterized as a land use decision that establishes development requirements for specific pieces of property. It is not a land use regulation that must be consistent with, and implement the Comprehensive Plan except to the extent required by Chapter 23.69 SMC and the Agreement.

14. The Agreement requires both the Director and the Examiner to assess the Master Plan based, in part, on “SEPA [and] other applicable land use policies and regulations of the City,” and the Director’s report is to include findings and recommendations on the Master Plan’s “[c]onsistency with “other adopted land use policies and regulations of the City”.”⁸ ~~Contrary to the University’s position, nothing in the Agreement indicates that “land use policies” are limited to the policies found in the Land Use Element of the Comprehensive Plan. If the drafters of the Agreement had intended to so limit the Director’s and the Examiner’s consideration of “land use policies,” the limitation would be spelled out in the Agreement.~~

~~15. In an unchallenged statement to the Seattle Hearing Examiner, the University District Alliance stated that “about half (13,387) of the 26,318 UW classified and professional (non-academic) employees workers earned less than 80 percent of Area Median Income (AMI), and about one-sixth (4,574) earn less than 50 percent of the AMI.”⁹ Applying those ratios to the forecast growth, the University can be expected to add 944 employees earning less than 80 percent of AMI, including 322 employees earning less than 50 percent of AMI. The FEIS for the Seattle Campus Master Plan assumes that there will be an average of two adult residents per staff and faculty household.¹⁰~~

~~16. Requiring development of housing for low income and very low income staff on or near the campus will mitigate transportation and housing impacts caused by the University’s growth permitted by this Plan. This required mitigation is imposed under the City’s land use authority to approve a Master Plan pursuant to SMC 23.69.006 B, the City-University Agreement, and SMC 23.69; it is not imposed pursuant to SEPA.~~

~~157. Transportation. Subsection III.C.6 of the Agreement provides that the City and University “will continue to act in partnership with King County Metro and Community Transit to provide a high level of transit service to the campus, University area, and nearby neighborhood business districts.”~~

~~168. Recommended Conditions 581, 5952, and 6053 are consistent with SMC 25.05.675.R.1, the City’s Traffic and Transportation “Policy Background,” which states, in part, that “[e]xcessive~~

⁸ Exhibit D5 at 5-6.

⁹ Exhibit P1, “U District Alliance Comments on UW Campus Master Plan”, undated, page 10

¹⁰ See, for example, Exhibit A19, Volume 1, page 3.8-27

traffic can adversely affect the stability, safety and character of Seattle’s communities,” and that the “University District is an area of the City which is subject to particularly severe traffic congestion problems ... and therefore deserves special attention in the environmental review of project proposals”. As noted above, the EIS documents that traffic generated by the Master Plan will cause substantial additional delay at intersections and reduce arterial speed for transit and general-purpose traffic. These impacts can reasonably be considered “excessive” within the meaning of SMC 25.05.675.R.1.a. The Master Plan anticipates major projects with substantial traffic volumes that will adversely impact surrounding areas,⁴¹⁹ and some individual projects anticipated by the Master Plan will create adverse impacts on transportation facilities serving those projects.⁴²¹⁰ Further, the recommended conditions, which mitigate the Master Plan’s anticipated growth impacts on transit facilities, would increase the use of alternative transportation modes.⁴³¹¹

179. The recommended conditions are also justified by the applicable SEPA transportation policies in SMC 25.05.675.R.2. Policy “a” is “to minimize or prevent adverse traffic impacts which would undermine the stability, safety and/or character of a neighborhood or surrounding areas.”

~~1820. Recommended-Condition 581~~ would increase capacities on likely overcrowded transit lines, thereby enhancing the University’s ability to meet its TMP goal by providing sufficient space on buses for prospective riders, thereby minimizing destabilizing and unsafe traffic impacts. However, although it is reasonable to assume that the increased demand resulting from additional University riders would exceed capacity on some routes on the screenline, it is not clear how that increased demand would be allocated across the routes in question. Thus, while it is reasonably likely that the additional 164 riders would result in the need for at least two additional bus transit coaches during the AM and PM peak hours, it is not clear that three additional coaches would be needed to maintain capacity across all routes within the screenline. The Examiner ~~recommends~~ recommended that the condition be revised to provide that the University pay King County Metro’s operating costs for two additional bus transit coaches in both the AM and PM peak hours to provide additional capacity on routes serving Campus Parkway near Brooklyn Avenue NE. Condition 58— has been revised to reflect this modification.

1921. ~~Recommended-Condition 592~~ would help fund proposed RapidRide lines in the University District, thereby increasing transit speed and reliability, increasing the attractiveness of transit, and minimizing destabilizing and unsafe traffic impacts. —Maintaining and improving transit performance is a necessary part of supporting an increase in transit service and meeting the University’s TMP goals. However, SEPA conditions must also be tied to impacts identified in the EIS, and mitigation should be tied to the cause of an impact not the measure of its effect. Therefore, the University shall incrementally help fund improvements based on the amount of development completed. Condition 59 has been revised to reflect this modification.

⁴¹⁹ See SMC 25.05.675.R.1.b.

⁴²¹⁰ See SMC 25.05.675.R.1.c.

⁴³¹¹ See SMC 25.05.675.R.1.d.

202. ~~Recommended~~ Condition ~~6053~~ would provide on-campus opportunities to accommodate high volumes of transit riders and shared mobility services, better connections between modes, and information related to travel and transfer options that would encourage the use of alternative modes, supporting the University's TMP and minimizing destabilizing and unsafe traffic impacts.

213. ~~Recommended~~ Condition ~~6255~~ would increase the size of waiting areas at two highly congested bus stops, which would encourage use of transit, supporting the University's TMP, and thereby minimizing destabilizing and unsafe traffic impacts, by decreasing discomfort from waiting in highly congested conditions. Such conditions at transit stops could also degrade the character of a neighborhood by causing congestion and blockages for pedestrians on sidewalks.

224. The EIS documents the availability of public transit, existing vehicular and pedestrian traffic conditions, and other specific policy elements. The results of, and the impacts identified in, the EIS transportation analysis shaped ~~the Director's recommended~~ conditions.⁴⁴¹² And the ~~Director's recommended~~ conditions, with the exceptions and modifications noted for ~~Recommended~~ Conditions 58 and 59, are attributable to the impacts identified in the EIS and generally based on a pro rata share of vehicle or transit trips generated by the growth anticipated under the Master Plan.

235. ~~The Examiner's recommended~~ As modified, the conditions are reasonable and capable of being accomplished.⁴⁵¹³ ~~Like the uncertainty for the University and the surrounding community that is inherent in a Master Plan, the recommended transportation conditions are expressed in terms of percentages of future costs that cannot be defined with certainty at this time. The costs will be made certain in advance of the time payment is required, however, and the University may then negotiate and challenge costs it deems inconsistent with the conditions.~~

246. The City Council adopts the ~~Examiner's recommended Condition 51 as amended, and the Director's recommended Conditions 52, 53, and 55~~ Conditions 58, 59, 60 and 62.

Other Conclusions

257. As conditioned, the Master Plan includes all elements required by Section II.A of the City-University Agreement.

268. As conditioned, the Master Plan is consistent with Section II.C of the Agreement concerning changes to the University master plan.

279. As conditioned, the Master Plan is consistent with relevant Comprehensive Plan policies.

~~2830.~~ As conditioned, the Master Plan appropriately mitigates short- and long-term environmental impacts identified in the EIS.

⁴⁴¹² See SMC 25.05.675.R.2.b; SMC 25.05.060.A.2.

⁴⁵¹³ See SMC 25.05.060.A.3.

~~2931.~~ As conditioned, the draft Shoreline public access plan is appropriate for SDCI's consideration. If the City Council approves the Master Plan, the University may submit a final Shoreline public access plan to the Director for consideration through the review and approval process in SMC 23.60A.164.K.

~~302.~~ The CUCAC's requested height reduction for Site W22 is not recommended. ~~Site W22, with the vacant sites across the street to the north and west, sit on the edge of the campus boundary and provide~~ Although some may consider it a gateway to the neighborhood. ~~The relationship between site W22 and the University Bridge and the midrise area to the west make the current height limit of 105 feet more appropriate than the proposed 240 feet., the site is not on the campus boundary and is proximate to the Seattle Mixed-University 75-240 zone that would allow structures up to 240 feet in height.~~

~~313.~~ The CUCAC's requested height reduction for Site W37 is not recommended. The University has identified a view corridor at this location, and because the topography rises to the north of the site, most of the square footage allocated to the site will be outside the view corridor.

~~324.~~ The suggestion that the Master Plan be amended to reduce the University's SOV rate to 12 percent by 2024 has some merit, particularly in light of the facts that the SOV rate is presently 17% percent and dropped after the opening of a new light rail station, access to light rail is planned to improve significantly through both new University-serving light rail stations and system improvements, the University proposes to replace parking lost in demolition under the Master Plan rather than reducing the parking cap, and the University commits only to consider revising its payment system for parking to reduce demand. ~~However, under current circumstances, the SOV reduction rates recommended by the Director and Hearing Examiner are reasonable and capable of being accomplished and are recommended.~~¹⁴

~~335.~~ The Council adopts the Examiner's recommendations on the proposed MIO height designations.¹⁵

¹⁴ History shows that the U-Pass system and its subsidies have been the primary incentives for changes in student travel modes, and increased subsidies for the employee and faculty U-Pass would significantly increase their access to affordable transportation options and reduce the University's SOV rate. The University has committed to going to the state legislature to seek inclusion of the state's higher education employees in the existing program that grants all other state employees living in King County a fully subsidized transit pass. A successful outcome in that forum would do more to reduce the University's SOV rate than mandating in the Master Plan that it achieve a 12% SOV rate by 2024.

¹⁵ Exhibit D1 at 45.

Attachment 3

Seattle City Council Amendments to the
University of Washington 2018 Seattle Campus Master Plan

The City Council intends to approve the University of Washington 2018 Seattle Campus Master Plan, as found in Clerk File 314346, provided that the University of Washington makes the following changes to the Plan as recommended by the Seattle Hearing Examiner and amended by the City Council.

1. Amend page 276 of the Housing section to include the statement, “The University ~~shall~~ commits to voluntarily construct no fewer than 150 affordable housing units for faculty and staff households earning less than 60% AMI and no fewer than 300 additional affordable housing units for faculty and staff ~~earning~~ households earning less than 80% AMI within the MIO boundary, Primary Impact Zone, ~~or~~ Secondary Impact Zone, ~~or within the City of Seattle near light rail stations or frequent transit routes~~ prior to the completion of 6 million net new gross square feet authorized by the CMP.”

2. A condition of the Master Plan shall state: “The University ~~shall~~ commits to voluntarily construct no fewer than 150 affordable housing units for faculty and staff households earning less than 60% AMI and no fewer than 300 additional affordable housing units for faculty and staff households earning less than 80% AMI within the MIO boundary, Primary Impact Zone, ~~or~~ Secondary Impact Zone. ~~All the required housing shall be constructed, or within the City of Seattle near light rail stations or frequent transit routes~~ prior to the completion of 6 million net new gross square feet authorized by the CMP.”

3. Page 98: Amend the first paragraph under “Open Space Commitment”:

...A design and implementation plan for the West Campus Green and the West Campus section of the continuous waterfront trail shall be completed by the earlier of: the time 1.5 million square feet of net new development in the West Campus sector is completed; or the time the University submits its first permit application for development of Site W27, W29, W33, W34, or W35.

4. Page 102: Amend the second paragraph under “Open Space Commitment”:

A design and implementation plan for the South Campus Greens, as well as the South Campus section of the continuous waterfront trail shall ~~occur when construction on the first adjacent development site is completed~~ (be completed by the time the University submits the first permit application for development of Sites S50, S51, S52, S41, S42, S45, or S46).

5. Page 104: Amend the second bullet under “Open Space Commitment”:

~~Construction~~ Completion of the East Campus section of the continuous waterfront trail shall ~~align with~~ be completed by the earlier of: completion of construction of the 750,000 gross square feet of net new development allowed in East campus under the CMP; or exhaustion of the 6 million square foot growth allowance.

6. Page 240: Amend the last three sentences of the first paragraph under “West Campus Green and Plaza”:

A design and implementation plan for West Campus Green and West Campus section of the continuous waterfront trail shall be completed by the earlier of: the time 1.5 million square feet of net new development in West Campus sector is completed; or the time the University submits its first permit application for development of Site W27, W29, W33, W34, or W35. A concept plan for all three sections of the continuous waterfront trail-West, South, and East-shall also be completed ~~at this~~ by that time. The concept plan for the continuous waterfront trail shall be reviewed by SDCI for compliance with the City’s Shoreline Management Master Program and the University’s Shoreline Public Access Plan. The continuous waterfront trail design and implementation plan for the South and East campus sectors shall include convenient pickup and drop off facilities and signage throughout the length of the trail that reflects local Native American history.

~~At the latest, e~~ Construction of the West Campus Green and the West Campus section of the continuous waterfront trail shall occur when shall be completed by the earlier of: completion of 3.0 million gross square feet of net new development in the West Campus Sector; at the completion of adjacent development sites W29, W33, and W34; or the exhaustion of the 6 million gross square foot growth allowance. In addition, as the University completes development of Site W29, it shall complete the “Plaza,” and as the University completes development of Site W27, it shall complete the “Belvedere,” both identified on page 98.

7. Amend the second paragraph under “South Campus Green”:

A design and implementation plan for the Greens, as well as the South Campus section of the continuous waterfront trail shall ~~occur when construction on the first adjacent development site is completed~~ (shall be completed by the time the University submits the first permit application for development of Site S50, S51, S52, S41, S42, S45, or S46.

8. Amend the third paragraph under “Continuous Waterfront Trail”:

~~Construction of the~~ The East Campus section of the continuous waterfront trail shall align with be completed by the earlier of: completion of construction of the 750,000 gross square feet of net new development allowed in East campus under the CMP; or exhaustion of the 6 million square foot growth allowance.

9. The University shall include updates about the progress of the planning and completion of the West Campus Green, the South Campus Green, and the continuous waterfront trail in the annual reports to the City.

10. Page 239: Add a new section to the beginning of the page:

ACTIVE STREET-LEVEL USE AND TRANSPARENCY

Active street-level uses shall be located within buildings adjacent to City of Seattle right-of-way in the West Campus sector, mid-block corridors in all sectors, West Campus Green Plaza and Belvedere, South Campus Green, and the continuous waterfront trail. Active street-level uses include commercial uses, child-care facilities, multi-use lobbies, lounges, study spaces, and active academic uses like classrooms, labs, libraries and hands-on collaboration spaces. All buildings with required active street-level use shall provide transparency within 2-8 feet above the sidewalk along 60% of the building façade. Where active street level uses are required, street-level parking within structures, excluding driveway access and garage doors or openings, is not allowed unless the parking is separated from street-level street-facing facades by active street level uses complying with the use and transparency requirements of this paragraph.

11. Amend the first two paragraphs under “Parking” on pages 240 and 241 to remove the student parking requirements, as follows:

PARKING

Parking is planned on a campus-wide basis, and needs for parking near new development are assessed concurrently with development planning. Parking spaces may be located in any sector to accommodate need. There is no minimum parking requirement. Overall, motor vehicle parking is limited to a maximum of 12,300 spaces within the MIO (the “parking cap”). Service and load zones, ~~parking for student housing,~~ and accessory off-campus leased or owned spaces are not counted toward the parking cap. Above-ground parking is not counted against the net new 6 million square foot growth allowance in the CMP.

~~Minimum parking standards for new student housing will be one space per unit for family housing and spaces for up to 4 percent of total residents for single student housing.~~

~~12. — Page 68: Under “Parking Lot Typologies,” amend the first paragraph as follows:~~

~~PARKING LOT TYPOLOGIES~~

~~Parking on campus is provided through surface, structured, and underground parking lots of varying sizes. As the campus has grown, surface parking lots have increasingly been replaced by buildings, sometimes without replacing lost parking capacity on that site. In 1991, the University agreed to a parking space cap of 12,300 in the MIO, and that same cap is in place today, 25 years~~

~~later. Twenty five years later, that cap is reduced to 9,000 spaces to better reflect actual parking use.~~

123. Amend the last paragraph on page 68 as follows:

The following types of spaces are excluded from the parking space cap and the parking count in the table: bicycle, loading spaces, the UW vehicle, physical plant vehicle, shuttle, UCAR, and miscellaneous restricted parking spaces, ~~and parking associated with residence halls.~~

134. Amend Table 5 on page 68 of the Master Plan to include parking associated with residence halls.

145. Page 68: Table 5. “Existing Parking Lots within Parking Spaces Cap, 2016” amend the notes at the bottom of the table ~~as follows:~~ to include parking associated with residence halls.

~~Total 10,667 ————— Parking Cap 12,300~~9,000 ~~Under Over Cap 1,633~~1,667

~~16. — Page 120: Under “Parking,” amend the first paragraph as follows:~~

PARKING

~~The existing parking cap of 12,300 parking spaces remains unchanged is reduced to 9,000 parking spaces to better reflect actual parking use. All new parking shall remain within the 9,000 12,300 parking spaces cap.~~

~~17. — Page 240: Under “Parking,” amend the first paragraph as follows:~~

PARKING

~~Parking is planned on a campus wide basis, and needs for parking near new development are assessed concurrently with development planning. Parking spaces may be located in any sector to accommodate need. Overall, motor vehicle parking is limited to a maximum of 9,000 12,300 spaces within the MIO (the “parking cap”). Service and load zones, parking for student housing, and accessory off-campus leased or owned spaces are not counted toward the parking cap. Above-ground parking is not counted against the net new 6 million square foot growth allowance in the CMP.~~

158. Page 241: Under “Parking,” amend the paragraph in the middle of the page:

Parking access is preferred from streets owned by the University. Where necessary, parking access from streets that are not owned by the University shall be allowed based on the following hierarchy of preference (from most preferred to least preferred). A determination on the final access location

shall be made by SDCI, in consultation with SDOT, based on this hierarchy. The final access location shall balance the need to minimize safety hazards and the feasibility of the access location based on topography, transit operations, bike infrastructure, vehicle movement, and other considerations ...

19. — Page 260: Under “Introduction,” amend the last paragraph on the page as follows: ~~To reinforce the University’s commitment to limiting auto travel, the University shall continue to cap the number of parking stalls available to commuters within the Major Institution Overlay boundary to 12,300~~ 9,000. This parking cap has remained unchanged since 1984.

1620. Page 242: Under “Public Realm Allowance,” amend the second paragraph:

The public realm allowance refers to a minimum zone between the street curb and the edge of building facade, and is intended to provide space for a comfortable and desirable pedestrian experience. ~~The public realm allowance proposed are based upon and maintain the current street widths which the University understands to be sufficient.~~ City of Seattle right-of-way widths are determined by SMC Chapter 23.53 and the Street Improvement Manual, or functional successor. Where required, improvements to the public realm allowance shall be completed in accordance with the adopted Green Street Concept Plan. The existing curb-to-curb width, plus the linear square feet associated with the public realm allowance defines the extent of impact on development sites.

1721. Page 251: Under “Upper Level Setbacks,” amend the first paragraph under “First Upper Level Setback”:

Sites with building footprints that exceed 30,000 square feet shall maintain a minimum upper-level setback of 20’ along sides of the building where the height exceeds the 45’ podium. Sites with building footprints smaller than 30,000 square feet and whose building height exceeds the 45’ podium height shall maintain a minimum upper level setback of 20’ along at least two edges of the podium. The required upper-level setback shall be provided along the street or major public open space façade if one exists. If necessary to allow flexibility and modulation of the building form, a maximum of 50 percent of the building perimeter may extend up to 90’ without a setback.

1822. Page 251: Under “Second Upper Level Setback,” amend the first paragraph as follows:

To create a more gradual transition between University and non-University property, an additional upper level setback shall be required ~~on building edges identified within the Development Standards and Design Guidance maps, pages 174, 189, 298, and 226.~~ for University property as follows: ~~s~~Sites with building footprints that exceed 20,000 square feet and whose building height exceeds 160’ that are located along University Way and Campus Parkway, shall be are required to step back an additional 20’ at 90’ in height along a minimum of one façade, generally the facade facing the more prominent street edge. Sites with building footprints that exceed 20,000 square feet and whose building height exceeds 160’ that are located along Pacific Street, shall be required

to step back an additional 20’ at 120’ in height along a minimum of one façade, generally the façade facing the more prominent street edge. The required second upper-level setback shall be provided along the street or major public open space façade if one exists.

1923. Page 239: Under “Ground Level Setbacks,” amend the third paragraph:

~~Setbacks may be averaged horizontally or vertically. University structures across a City street or alley from commercial, mixed use, manufacturing, or industrial zones outside the MIO boundary shall have no required setbacks. Pedestrian bridges, retaining walls, raised plazas, sculpture and other site elements shall have no required setbacks requirements.~~

204. Page 156: Amend the paragraph under “Gateways”:

The University’s Seattle campus is embedded within the larger urban fabric of the city and has multiple points of access. Gateways, including NE 45th Street at 15th Avenue NE, the “landing” of the University Bridge at NE 40th Street, and NE 45th Street at 25th Avenue NE, serve as important access points for pedestrians, bikes, and vehicles, and may provide a welcoming and clear sense of arrival on campus. Gateways also form key points of connectivity between campus sectors. Gateways should include visual enhancements that signify entries into the community, such as landscaping, signage, artwork, or architectural features that will be installed at the discretion of the University. Gateways also form key points of connectivity between campus sectors.

215. Page 232: Amend the second bulleted paragraph:

~~A new development site: A proposal for a development site not previously approved under the Master Plan is considered a proposed change to the Master Plan and will comply with the City-University Agreement Section II.C.1 – 5, Changes to University Master Plan. ~~shall constitute an exempt Campus Master Plan change, unless the proposal requires a Plan amendment according to the provisions of the City-University Agreement because the Director of SDCI (or its successor department) determines that the specific use proposed for a site, within the broad use categories permitted in tables 14 through 17, is inconsistent with the guiding principles or policies of this Campus Master Plan, or because of the use relationship to, or cumulative use impacts upon, area surrounding the University boundary.~~~~

226. Page 233: Remove the two bulleted paragraphs.

237. Page 261: Amend the first bulleted item and the first sentence of the third bulleted item:

“Convene a transportation agency stakeholder meeting, at least quarterly, to review progress and discuss unforeseen transportation challenges and opportunities. The group will not have oversight to set TMP priorities.”

“Conduct an annual survey and provide the results of its efforts to the City- University Citizen Advisory Committee (CUCAC), SDOT Director, SDCI Director, Seattle City Council members, transportation agency stakeholders, and transit agency partners.”

248. Page 261: Under “Monitoring and Reporting,” amend the text following the bulleted items:

The University’s TMP SOV rate goal is 1720% as of the date of this Plan. The goal shall decrease to 1517% one year after the opening of the Northgate Link Extension. The goal shall decrease further to 1315% one year after the opening of the Lynnwood Link Extension, and 12% by 2028 or the development of six million net new gross square feet, whichever is earlier.

If the University fails to achieve the applicable SOV rate goal, the University shall take steps to enhance the TMP to increase the likelihood that the goal shall be achieved. Additional measures will be set by the University and may include, but are not limited to:

- Providing a transit pass that covers all transit trips with a minimum University subsidy of 50% for faculty, staff, and students, pursuant to SDCI Director’s Rule 27-2015 and SMC 23.54.016
- Replicating the student U-Pass “opt-out” program with faculty and staff to encourage participation among campus populations less likely to use transit
- Expanding the U-Pass to integrate payment for other transportation options, such as car-share or bike-share
- Implementing performance-based parking strategies, including charging more for high-demand parking lots
- Replacing monthly parking permits with a pay-by-use parking payment model

~~In 2028, if the University has not failed to timely reached its SOV rate goal of 20%, 17%, 15% 13%, or 1215% for a period of 24 months, the Director of Seattle Department of Construction and Inspections (SDCI) or its successor agency shall not issue master use permits or building permits shall not be issued for development (other than maintenance, emergency repair, or other minor projects) within the MIO. if the University exceeds the 15% SOV goal over two consecutive years beginning in 2029. The Director of Seattle Department of Construction and Inspections (SDCI)(Or its successor agency) The SDCI Director shall withhold permits until the University has it has been reasonably demonstrated to the satisfaction of the Director that it the University will implement additional mitigation measures shall be implemented that shall meet or restore the University student, faculty, and staff to the required SOV rate to 15%. This measure shall not be applied to maintenance, emergency repair, or other minor projects proposed by the University.~~

259. Pages 50-51: Under “Movement to and from Campus” amend this section as follows:

MOVEMENT TO AND FROM CAMPUS

The University of Washington has an extremely desirable mode split—a term used to describe the various ways students, faculty and staff travel to and from campus. Its single occupancy vehicle (drive-alone) rate is low at ~~20~~ 17 percent of campus commutes, while walking, biking and transit collectively account for ~~72-76~~ 72-76 percent of campus commutes. The introduction of light rail is anticipated to further modify the mode split. The mode split is discussed in greater detail in the Transportation Management Plan Chapter, the University of Washington Master Plan Seattle Campus Annual Reports, and the Transportation Discipline Report in the CMP EIS.

The mode split aligns with the findings from the campus wide MyPlaces survey as part of the Campus Landscape Framework, in which individuals were asked to identify key campus gateways, or locations at which individuals enter the campus. Details of the mode split analysis methods and history are provided in the Transportation Discipline Report of the CMP EIS. In the mode split analysis, the intersection of 15th Avenue NE and Campus Parkway emerged as the primary gateway to campus, which aligns with Campus Parkway’s identity as one of two significant transit hubs near campus (the second hub is located at the Montlake Triangle). Additional gateways are also located along 15th Avenue NE and at the intersection of 45th Street and Memorial Way, which further reinforces the need to better integrate the entrances to campus with the surrounding urban context. Fewer gateways were identified along the edges of East Campus, which signals the need to improve connections between the Central and East Campus sectors generally.

The campus wide mode split for faculty, staff and students is taken from a U-Pass survey of travel modes to the campus in the morning. The 2015 survey’s results ~~are~~ were consistent with survey results from the last decade, and showed the drive alone to campus rate ~~is~~ was approximately 20%; ~~however,~~ However, the 2016 survey’s results, which represent the conditions after the opening of the Husky Stadium light rail station, indicate a drive alone rate of only ~~18%~~ 17%. The Transportation Discipline Report describes the analysis and ~~is~~ was based on the more conservative 20% drive alone mode split from 2015. ~~The Campus Master Plan is based on the current mode split of 17%.~~

2630. Pages 51: Figure 32. 2015 Mode Split (Morning Arrivals to Campus):

Update Figure 32 to reflect the 2016 Mode Split from the 2016 U-Pass annual survey results.

31. — Page 260: Under “Introduction,” amend the second paragraph: ~~Beginning in 1983, the University’s commitment to managing its transportation impacts was formalized in its Transportation Management Plan, which embodies the intent to expand commuting options for University students, staff, and faculty, and to shift travel habits away from single occupancy vehicles. The primary goal of the University’s TMP is to reach 15% 12% single occupancy vehicle rate by 2028. Through its active and innovative efforts, the University has successfully kept single occupant vehicle trips under 1990 level despite a 35% increase in campus population.~~

32. — Page 260: Under “Transportation Management Plan Goal”

~~Limit the proportion of drive-alone trips of student, staff and faculty to 15% by 2028, one year after opening of the Northgate Link Extension, to 13% one year after opening of the Lynnwood Link Extension and 12% by 2028 or the development of six million net new gross square feet, whichever is earlier.~~

2733. Maintain the existing MIO height limitations (105') for properties along University Way north of Campus Parkway (Sites W19 and W20). Amend Table 10: Maximum Building Ht. Limit and Figures 125, 150, 153 and 191 to show the MIO height limitation of 105 ft. for Sites W19 and W20.

2834. Limit structure height on development sites W31 and W32 to 30 ft. and amend Table 10 “Conditioned Down Building Heights” accordingly.

2935.

(a) Pages 208 – 209 (Figure 169): Change to a Secondary Access Corridor the Priority Pedestrian Connector that extends southward from the northern end of Portage Bay Vista. Also change to Secondary Access Corridors two of the three northeast-southwest-oriented Priority Pedestrian Connectors (the three that are perpendicular to NE Pacific St.). List the symbols used to identify the Secondary Access Corridors in Figure 169’s key on page 209 under “Development Standards.”

(b) Page 240: Under “South Campus Green,” add the following to the end of the second paragraph:

The design and implementation plan for the Greens and South Campus section of the continuous waterfront trail shall include the final locations and dimensions of mid-block corridors, secondary access corridors and priority pedestrian connectors represented in Figure 169.

(c) Page 244: Add the following new development standard before “Shorelines”:

Secondary Access Corridors

Secondary access corridors are required in the approximate locations identified in Figure 169. Secondary access corridors are to be welcoming pedestrian corridors that provide public access, and views where possible, from NE Pacific Street into the South Campus and South Campus section of the continuous waterfront trail. These corridors shall be a minimum width of 12’ and, where possible, open to the sky.

306. Page 251: After the last paragraph under “View Corridors,” add:

When proposing to develop sites adjacent to or within the 12 view corridors documented on Table 19 (pages 252 and 253), the University shall provide more detailed analysis of the existing or proposed views and demonstrate how the proposed development will maintain existing or proposed view corridors.

3137. Page 252: Amend the View Corridor 8 description as follows:

The view is of Lake Union generally to the southwest from the west pedestrian walkway along the University Bridge, at the edge of the existing UW Northlake building.

328. Page 253: Replace the View Corridor 8 graphic with the new one the University submitted to SDCI that is consistent with other view corridor graphics in terms of formatting.

339. Page 6: Amend the third paragraph under “Purpose and Context”:

Work on this CMP began in 2015 so that by 2018, the 2018 CMP would be in place to accommodate the Seattle campus’ growth demands. Between 2015 and 2018, the University of Washington developed this long-term vision for the Seattle campus as well as a 10-year conceptual plan for campus growth that ~~balances~~ provides for the preservation of historic campus assets with intensive investment.

3440. Page 8: Amend the paragraph under “Guiding Principles”:

The CMP ~~balances~~ provides for the preservation of historic campus assets with increased density, and relies on the University’s strategic goals, academic, research, and service missions, and capital plan objectives, to inform the physical development of the campus. Five overarching principles guide the 2018 CMP:

3541. Page 24: Amend paragraph Nos. 1, 3, and 5 under “Regulatory Authority and Planning Process”:

1. Pursuant to RCW 28B.20.130, ~~the~~ the University of Washington Board of Regents ~~exercises full control of the University and its property has~~ “full control of the University and its property of various kinds, except as otherwise provided by State law.” Pursuant to RCW 36.70A.103 and .200, “[s]tate agencies shall comply with the local . . . development regulations and amendments thereto adopted pursuant to this chapter,” but “[n]o local . . . development regulation may preclude the siting of essential public facilities,” including “state education facilities.” The Washington Supreme Court has ruled that the University is a state agency and the Regents’ “full control” under RCW 28B.20.130 is limited by RCW 36.70A.103.

3. The City-University Agreement governs preparation of the CMP. Consistent with the City-University Agreement and the City’s Major Institutions Code, ~~the~~ the CMP includes design guidance, development standards of the underlying zoning, and other elements unlike those applicable to other major institutions which differ from or are in addition to those included in the City’s Major Institutions Code, consistent with the City-University Agreement. A Major Institution Overlay (MIO) district and boundaries are established through the CMP adoption and ~~e~~City ordinance.

5. ~~The University shall comply with the provisions of the Seattle Shoreline Master Program and other applicable State or Federal laws. University development remains subject to City development regulations that do not constitute development standards of the underlying zoning and do not preclude the siting of an essential public facility within the meaning of RCW 36.70A.200.~~

3642. Page 150: Amend the paragraph under “Introduction”:

Chapter 6 contains detailed information on the 10-year conceptual plan for campus, including sector-by-sector descriptions of the design goals for each area. This Chapter further provides information on the University’s Project Review Processes, and includes non-binding design guidance. Although non-binding, design guidance will be implemented through capital project design and environmental review carried out by the Architectural Commission, the University Landscape Advisory Committee, the Design Review Board (all as applicable), and project design teams. ~~In a few places, Several figures reference development standards are referenced; these standards of the underlying zoning are set out and explained further as mandatory requirements in Chapter 7.~~

3743. Page 151: Amend the paragraph under “Demolition”:

~~Demolition is permitted prior to future development as long as sites are left in a safe condition and free of debris. Demolition may be permitted prior to future development where authorized by any required permit. Demolition permits are may be submitted in advance of a building site being selected for development and any grading work is reviewed under the Grading Code (SMC Chapter 22.170). Demolition of any structure, including any structure that is more than 25 years old or historic, is allowed if authorized by the UW Board of Regents.~~

3844. Page 153: Amend the first four sentences of the first paragraph under “History of Stewardship by the Board of Regents”:

Over the last century, the University of Washington Board of Regents has been the steward of the University of Washington campus. The Regents recognize the value of the campus setting to the University, the greater University area community, the City of Seattle, the State of Washington, and future generations. ~~The University is~~ As a state institution of higher education and a state agency. Pursuant to RCW 28B.20.130, the Regents “have full control and authority over the development of the campus of the university and its property of various kinds, except as otherwise provided by law.” The institution is encumbered with a public purpose that is essential to the future of the State, and this purpose requires that the campus continue to be developed to meet the growing and changing education needs of the State. Pursuant to RCW 36.70A.103 and .200, “[s]tate agencies shall comply with the local . . . development regulations and amendments thereto adopted pursuant to this chapter,” but “[n]o local . . . development regulation may preclude the siting of essential public facilities,” including “state education facilities.” The Washington

Supreme Court has ruled that the University is a state agency and the Regents’ “full control” under RCW 28B.20.130 is limited by RCW 36.70A.103.

3945. Page 155: Amend the paragraph preceding “The Historic Resource Addendum (HRA)”:

The review of historic resources on the campus utilizes the process stated above. In 2017, the Washington State Supreme Court concluded:

The plain language of the current statutes provide that the Regents’ authority is subject to limitation by applicable state statutes, including the GMA’s provision that state agencies must comply with local development regulations adopted pursuant to the GMA. UW property that is located in Seattle is thus potentially subject to the [the City’s Landmarks Preservation Ordinance] absent a specific, directly conflicting statute.

University of Washington v. City of Seattle, 188 Wn.2d 823, 845, 399 P.3d 519 (2017). and does not include a review under the City of Seattle’s Landmark Preservation Ordinance. The University’s position is that it is not subject to the ordinance, as the University of Washington Board of Regents has full control and authority over all development on campus.[†]

[†]~~Arguments related to this topic have been heard by the Washington Supreme Court. A decision is pending.~~

406. Page 230: Amend the first paragraph under “Introduction”:

Consistent with SMC 23.69.006.B, T~~his~~ chapter outlines the development standards of the underlying zoning that ~~guide proposed regulate~~ development within the campus boundaries. The City-University Agreement requires that all University of Washington development within the Major Institution Overlay (MIO) boundary follow the standards outlined in this chapter. While Chapter 6 includes design guidance to be used to achieve the design intent for the campus, this chapter includes the required development standards of the underlying zoning for campus development.

417. Page 238: Delete all text in its entirety and replace it with the following:

Subject to a Major Institution Overlay (MIO), as shown on page 26, a variety of zoning designations make up the underlying zoning of the Campus. As of the date of this Master Plan, the development standards of the underlying zoning are found in the provisions of SMC Chapters 23.43 through 23.51B, SMC 23.54.016.B, and 23.54.030 relevant to those zones.

This Chapter contains the development standards that supplant the development standards of the underlying zoning within the MIO boundary as allowed by SMC 23.69.006.B and the City-University Agreement. The development standards in this Chapter are tailored to the University

and its local setting, and are intended to allow development flexibility and improve compatibility with surrounding uses.

Development standards of the underlying zoning not addressed in the Master Plan may be developed in the future by the University, provided they are consistent with and guided by the goals and policies of the City-University Agreement, the goals and policies of this Master Plan, and the process for any amendments to the Plan required by the City-University Agreement. Lack of specificity in the Master Plan development standards shall not result in application of provisions of underlying zoning.

University development remains subject to all other City development regulations that do not constitute development standards of the underlying zoning and do not preclude the siting of an essential public facility within the meaning of RCW 36.70A.200.

428. Page 241: Delete the fifth, one-sentence paragraph under “Parking”:

~~All new development shall consider opportunities for bike parking facilities.~~

439. Page 267: “Bicycle,” amend as follows:

Bicycle

Bicycling is a reliable, active, space-efficient, and carbon-free commute option for UW students, faculty, and staff. For neighborhoods close to campus, bicycling commuting times can rival those of transit or driving. Reliable door-to-door travel times likely contribute to the popularity (according to U-PASS survey data) of bicycling among faculty, who are otherwise more likely to drive alone. The University of Washington has long supported bicycle commuting through infrastructure and programming. Continued investment in the capacity and security of campus bicycle parking, quality of campus bicycle routes, and innovative educational and encouragement programming shall accommodate growth in the number of bicyclists reaching the growing campus. The University of Washington currently supplies bicyclists with multiple locations for securing and storing their bicycles on campus. High security parking and showers are available at some campus locations for students, faculty and staff. Bike lockers and space in cages can be rented for a fee on a quarterly or annual basis. Bicycle routes on the Burke-Gilman Trail and University Bridge and elsewhere provide bike access to campus. The Burke-Gilman Trail provides excellent access to West, South and East Campus locations. Bike routes are outlined in the CMP. The University completed a corridor study and design concept plan for expansion of the Burke-Gilman Trail in 2012 and is working toward implementing these improvements as funding allows.

POTENTIAL BICYCLE IMPROVEMENT STRATEGIES

1. Plan a comprehensive on-campus bicycle network that provides desirable bicycle facilities while reducing conflicts with other modes, enhancing the pedestrian experience throughout campus.
2. Work with partners to develop connections to and from key neighborhoods, regional bicycle facilities, and transit hubs.
3. Work with the City and transit agencies to improve sidewalks, transit stops, and other bicycle amenities near transit services and hubs including consideration of space for secure bicycle parking.
4. Coordinate with the City to create bicycle connectivity through the street network, particularly along the University Bridge, Montlake Bridge, Brooklyn north to Ravenna Park, and west over I-5.
5. Improve the connectivity and interfaces of the off-campus bike network, the Burke- Gilman Trail, and Central Campus.
6. Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan as funding allows.
7. Provide adequate bike parking supply to serve demand.
8. Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, lockers, and shower facilities.
9. Develop a Bicycle Parking Plan that identifies a toolbox of parking solutions and design standards.
10. Investigate ways to reduce bicycle thefts.
11. Encourage transit agencies to identify strategies for accommodating increased bicycle travel demand on transit.
12. Consider integrating programs (like future bike share and secure bike parking) into the U-PASS and work with partner agencies to expand these mobility options with connections to transit hubs and other campus destinations.

4450. Page 244: Amend the second paragraph under “Shorelines” (including the addition of a footnote) to recognize that any amendment to the Shoreline Master Program must be made by the City Council and approved by the Washington State Department of Ecology:

The Shoreline Management Act (SMA) regulates development, uses, and modifications of shorelines of the state in order to protect the ecological functions of shoreline areas, encourage water-dependent uses, provide for maximum public access, and preserve, enhance, and increase views of the water. The City of Seattle has adopted implementing regulations for the Shoreline Management Act for development and use of shorelines within the City limits. The City’s shoreline regulations, called its Shoreline Master Program (SMP), are currently found in SMC Chapter 23.60A. There are currently three shoreline environments within the MIO: the Conservancy Preservation environment, the Conservancy Management environment, and the Urban Commercial environment, as shown on pages 110 to 111. The University follows applicable SMP regulations for University development proposed within the shoreline. ~~The applicable regulations are will be those in effect on the date of adoption of this Master Plan if: (1) the City amends the SMP to so provide; and (2) the Washington State Department of Ecology approves that amendment.~~¹³ If those conditions are not met, the applicable regulations will be those applied pursuant to City and Washington vested rights law. For existing buildings within the shoreline environment, regular repair, maintenance and restoration is allowed, provided such activity is consistent with the SMP.

¹³ As of the date the University submitted a final draft of this Master Plan to the City Department of Construction and Inspections, SMC 23.60A.016.D stated: “Nothing in this Chapter 23.60A changes the legal effect of existing approved Major Institution Master Plans adopted pursuant to Chapter 23.69 or Ordinance 121041.”

4551. Page 246: Amend the first sentence of the third paragraph under “Structure Height Limits”:

~~All development within the Shoreline District, which is all development within 200 feet of the shoreline and associated wetlands, is restricted to a~~ the maximum building height of 30 feet specified in SMC Chapter 23.60A.

4652. Page 254: Insert a sentence after “Definitions” and before “Development”:

Where a conflict exists between the definitions in this Plan and those in SMC Chapter 23.84A or SMC Chapter 23.86, the definitions in this Plan shall apply.

4753. Page 255: Amend the paragraph under “MIO” to accurately reflect legislative history:

The Major Institutional Overlay (MIO) boundary defines the extent of the campus that is governed by the City-University Agreement, and the development standards defined within this CMP. The MIO boundary was established by ~~o~~Ordinance 112317 and subsequently amended.

4854. Page 104: clarify how waterfront trail relates to Shoreline Public Access Plan by revising the text in the last bullet point on the page to say:

“The University has proposed a Shoreline Public Access Plan as part of the CMP that incorporates and supports the continuous waterfront trail. The trail’s design will incorporate the Access Plan improvements that relate to the trail shown on pages 108-111. Refer to those pages for more information about the Shoreline Public Access Plan.”

4955. Page 108: Delete the following paragraph, because commercial uses are not public access uses.

~~Commercial water dependent uses, including moorage for private boats and boat rentals, may be included in the Urban Commercial shoreline in West Campus where their requirements do not conflict with the water dependent uses of the College of Ocean and Fishery Sciences or limit public access to the waterfront. Potential uses could include a passenger ferry dock. Uses which would require additional single purpose public parking shall be discouraged.~~

506. Delete the following statement on page 108, at the end of the South Campus discussion:

~~The public dock in South Campus would be removed.~~

517. Page 108: Clarify the approval process for the Shoreline Public Access Plan in the introduction:

~~“This section provides the University’s Shoreline Access Plan. It is a combination of both existing and new elements. Please refer to pages 48 and 49 for information on existing shoreline access conditions. It shall be binding upon University development within the shoreline district when the City approves the Access Plan pursuant to SMC 23.60A.164.K. It is a combination of both existing and new elements. Any modifications to the Shoreline Access Plan will be processed pursuant to the City-University Agreement’s provisions for amendments to the CMP.”~~

528. Page 240: Add text to the end of the final paragraph under the heading “Continuous Waterfront Trail”:

The University has proposed a Public Access Plan as part of the CMP that supports the continuous waterfront trail. Refer to pages 108 to 111 for more information about the Public Access Plan. The continuous waterfront trail design and implementation plans will show the existing and proposed shoreline public access plan improvements documented on pages 108-111 that are part of the trail.

539. Page 109: Add the following after the recommended text regarding the continuous waterfront trail:

Boat Launch Access Points

The design and implementation plan will evaluate the need for new hand-carry boat launch access points and will provide for additional signage for all existing and proposed boat launch access points.

5460. Prior to issuance of any demolition, excavation, shoring, or construction permit in West, South, or East Campus, provide a Construction Management Plan that has been approved by SDOT.

The submittal information and review process for Construction Management Plans are described on the SDOT website at: <http://www.seattle.gov/transportation/cmp.htm>

5561. Pages 234-237: Amend Tables 14 – 17 to list the year of construction for all existing buildings on identified development sites.

5662. If SDOT determines that new traffic signals are warranted at the following intersections while the Master Plan is in effect, the University will pay the indicated proportional share of the cost of the new signals: University Way NE/NE 41st Street, 24.5%; and 6th Avenue NE/NE Northlake Way, 15.1%. The University will have one year following delivery of an itemized accounting from SDOT of the new signal cost for an intersection to pay its indicated share for that intersection. The amount of new signal cost for which the University will be required to contribute a proportional share will not exceed \$500,000 per intersection (adjusted upward by 3.5% annually from the date of final CMP approval to the date the University receives the accounting for the relevant intersection).

5763. The University will contribute 9% of the costs of ITS improvements at the time of ITS implementation within the primary impact zone, and 3.3% of the costs of ITS improvements at the time of ITS implementation within the secondary impact zone. The University's contribution will be capped at \$1.6 million for ITS improvements in the primary impact zone, and \$293,000 for ITS improvements in the secondary impact zone. Both caps will be adjusted upward by 3.5% annually from the date of final CMP approval until the delivery to the University of an itemized accounting of improvement costs from SDOT. The University will have one year following delivery of an itemized accounting of improvement costs from SDOT to pay its contribution.

5864. Upon development of six million net new square feet, the University will measure the demand-to-capacity ratio on routes serving Campus Pkwy near Brooklyn Ave NE. If the ratio on a route exceeds 96 percent, the University shall pay King County-Metro the operating costs for two additional bus transit coaches in both the AM and PM peak hours to provide additional capacity on routes serving Campus Pkwy near Brooklyn Ave NE. Operating costs for each additional bus transit coach is defined as the cost of the driver and the costs of maintenance and repairs.

5965. The University shall fund such SDOT capital improvements ~~to identified by SDOT and agreed to by the University, that~~ facilitate transit performance within the primary and secondary

impact zones at the time of implementation of the respective RapidRide project as follows: Primary and Secondary Impact Zones, up to but not exceeding \$10 million dollars payable upon completion of at the following development increments:

1. Occupancy of 500,000 net new gross square feet - \$2.5 million
2. Occupancy of 1 million net new gross square feet - \$2.5 million
3. Occupancy of 1.5 million net new gross square feet - \$2.5 million
4. Occupancy of 2 million net new gross square feet - \$2.5 million

- ~~• 11th Avenue NE/Roosevelt Avenue NE: 11% of the cost of the RapidRide project within the primary impact zone; 5.5% within the secondary impact zone.~~
- ~~• NE 45th Street/15th Avenue NE/Pacific Avenue NE: 30% of the cost of the RapidRide project and other planned transit improvements, including bus only and BAT lanes, within the primary impact zone; 15% within the secondary impact zone.~~
- ~~• Montlake Blvd NE: 25% of the cost of the RapidRide project and other planned transit improvements, including bus only lanes, within the primary impact zone; 12.5% within the secondary impact zone.~~

606. The University shall dedicate space at new developments adjacent to existing and future Link light rail stations and RapidRide stops to better accommodate higher volumes of transit riders, provide better connections between modes, accommodate shared mobility services, and provide transportation information related to travel and transfer options.

617. The University shall upgrade the campus gateway at 15th Ave NE/NE 43rd Street as adjacent sites redevelop to comply with the Americans with Disabilities Act, and, without undertaking an obligation to act, consult with SDOT to identify opportunities to implement the U District Urban Design Framework streetscape concept plan connection between this campus entrance and the new U District light rail station.

628. The University shall expand, or pay SDOT for transit stop expansion, at 15th Avenue NE/NE 42nd Street and NE Pacific Street/15th Avenue NE as part of the NE 45th St/15th Ave NE/NE Pacific St RapidRide implementation.

639. The University shall ~~construct~~ separate ~~pathways for~~ bicyclists and pedestrians on the Burke-Gilman Trail through the campus, and install lighting following the University's Facilities Design Guidelines and Campus Illumination Study, or successor documents by 2024.

6470. The University shall widen the Burke-Gilman Trail between Brooklyn Avenue NE and 15th Avenue NE (the Garden Reach) by 2028 or when site W27 develops. The University shall widen the Burke-Gilman Trail north of Rainier Vista (the Forest Reach) when sites C8 or C10 develop, or as opportunities permit.

6571. The existing trip cap and parking cap shall be maintained.

- 6672.** The University shall correct for typographical errors in the Master Plan as follows:
- a. Page 8, first sentence in top of third column: in the Development Standards ~~Chapter~~
Chapter
 - b. Page 27, last sentence: For underlying zoning within the University’s MIO boundary, please refer to the City of Seattle’s Official Zoning Map, copies of which are included on pages 290 and 291 (Figures 201-204).
 - c. Page 71, graphic change: remove extra line break before “Figure 55.”
 - d. Page 94, last bullet: Please reference the ~~Project Review~~ and Design Guidance ~~chapter~~ section on page 156.
 - e. Page 103, open space commitment text: The land inside the dotted line in Figure 98 is preserved for a future open space in Central Campus and East Campus, but is not intended to be completed within the 10-year conceptual plan.
 - f. Page 126, Transfer of Development Capacity: The growth allowance may be moved between development sites and between sectors as outlined on page ~~255~~ 233 of the Development Standards chapter.
 - g. Page 130, second to last paragraph: For more information about partnership space needs, please refer to the space needs section on pages ~~34 through~~ 35.
 - h. H. Page 154, second paragraph: Registered State and Federal Historic Buildings are identified ~~in~~ on page 92 (Figure 78).
 - i. Page 157, first sentence: The maps on pages 174, ~~189-195~~, 208, and 226 (Figures 137, 157, 169, and 185) identify priority pedestrian connectors....
 - j. Page 207, graphic change: modify building envelopes and labels for S38, S39, S40, S41 and S45 to be 200’.
 - k. Page 242, third bullet point: change “Pacific Avenue NE” to “NE Pacific Street.”
 - l. Page 243, Figure 189: change “Pacific Avenue” to “Pacific Street” in figure graphic and caption text.
 - m. Page 319, update description of Figure 189 to say “Section through Pacific Street.”

- n. Page 251, View Corridors paragraph: Therefore, campus development is prohibited within designated view corridors that are depicted on Figures 192 to 195 page 257 (Figure 193); on pages 174, 195, 208, and 226 (Figures 137, 157, 169; and 185); and in the table and accompanying graphics on pages 252 to 253.
- o. Page 264, Table 21: Change the top cell under “Faculty” to \$308 instead of \$150.
- p. Page 73 and 123, figures 59 and 111: clarify that current zoning on the north side of NE 41st Street between 11th Avenue NE and 12th Avenue NE allows heights up to 105’.

73. Page 255: Amend the paragraph under “Growth Allowance” as follows:

GROWTH ALLOWANCE

The phrase “growth allowance” refers to the 6.0 million gross square footage of net new development approved within the University’s MIO boundary authorized by ~~under~~ this CMP. Above ground parking, space dedicated to child care uses, housing that is permanently affordable to households earning less than 80% of Area Median Income, and commercial spaces on the ground floor of buildings designed for and dedicated to small businesses are ~~is~~ not counted against the net new 6.0 million square foot growth allowance in the CMP.

74. Page 143: Amend the last paragraph under “Storm Drainage”

There are currently no known capacity issues with the University’s storm drainage systems, but storm drainage shall be evaluated as new development occurs. If capacity issues are identified, the University will use best management practices to reduce stormwater overflows and discharges into waterways, to the extent practicable.

From: Nicole Grant <nicole@mlklabor.org>
Sent: Friday, October 26, 2018 2:20 PM
To: Whitson, Lish
Subject: MLK Labor Proposed Comments on UW Campus Master Plan



MLK Labor Proposed Comments on UW Campus Master Plan

—
October 2018

MLK Labor is proud to be a part of the U District Alliance for Equity and Livability. We support the full recommendations of the U District Alliance regarding housing, transportation, zoning, child care, priority hiring, small business and re-negotiating the City-University Agreement. We support elements of the City Council's Resolution 31839 regarding the University of Washington's Campus Master Plan. We believe that **three** sections should be further strengthened to ensure that the UW's growth benefits the whole community:

- 1) Child Care Vouchers**

Working families throughout Seattle and King County face a lack of affordable, high quality child care. We believe that the City and University have an opportunity to take an important step forward on one practical solution to this problem:

MLK Labor requests that the Council include a mandate for a joint City-University study and program to institute a child care voucher program for UW employees.

2) Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA).

MLK Labor requests an addition to these recitals:

“Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year.”

3) Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL’s unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. The Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit, based on student living arrangements. This is an unreasonable and unworkable assumption for many reasons.

MLK Labor calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to 944 total affordable units (622 @ 80% AMI and 322 @ 50% AMI) to ensure that UW employees with the greatest housing cost burdens will not have to disrupt their current household size to qualify for affordable housing.¹
2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.
3. To set an intermediate goal for the UW of producing 450 housing units by 2023.
4. If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.
5. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
6. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
7. The housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.

8. That UW contribute more than just land to the effort. They should actually provide the housing.

MLK Labor and the whole U District Alliance for Equity and Livability look forward to further Council discussion of these conditions and would welcome the opportunity to answer questions and provide more information at a future Committee or Council meeting.

On Behalf of MLK Labor

Nicole Grant

Executive Secretary Treasurer

U District Alliance for Equity and Livability - Amer. Assoc. of Univ. Professors (AAUP)-UW Chapter, Beacon Hill United Methodist Church, Church Council of Greater Seattle, Coalition of Immigrants, Refugees and Communities of Color (CIRCC), Eritrean Association in Greater Seattle, Feet First, Laborers Local 242, Low Income Housing Institute (LIHI), **MLK Labor**, Puget Sound Sage, Roosevelt Neighborhood Association, Seattle Building Trades Council, Seattle Human Services Coalition, SEIU Local 925, SEIU 6, SEIU Health Care 1199NW, Sierra Club, Teamsters Local 117, Transit Riders Union, United Students Against Sweatshops, UAW Local 4121 (Grad Students), Univ. District Community Council, UNITE HERE (Hotel) Local 8, UW Faculty Forward, UW Young Democrats, Wallingford Community Council, WA Community Action Network, WA Federation of State Employees Local 1488, WA State Nurses Association

¹The UW EIS (3.8 27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

UNIVERSITY DISTRICT COMMUNITY COUNCIL
C/O 4534 UNIVERSITY WAY NE
SEATTLE, WA 98105
(206) 527-0648
udistrictcouncil@hotmail.com

October 26, 2018

Seattle City Council
C/O Lish Whitson,
City Council Central Staff
Via email to lish.whitson@seattle.gov

Mr. Whitson,

I am writing on behalf of the University District Community Council to offer our response to the City Council's Preliminary Decision regarding the University of Washington's 2018 Campus Master Plan.

While we appreciate the Council's adoption of CUCAC's and the UDCC's recommendation that the height at site 22W be kept at the current 105' height limit, we request – in the strongest possible terms – that the Council reconsider its decision to not adopt Councilmember Herbold's proposed amendment that would retain the current 65' zoned height at Site 37W, rather than adopting the University of Washington's proposal to double it to 130'.

As we (and CUCAC) noted in our comments to the City of Seattle Hearing Examiner as well as to the City Council, the proposed height increase at Site 37W is simply inconsistent with the adjacent zoning. This site is located across a narrow street from the Shoreline Overlay Zone to the south, which is limited to 30'/37' heights. In addition, the vast majority of Site 37W is directly abutted to the north by Midrise Zoning with a 65' height limit. Both of these facts are readily available in the CMP and are also clearly documented on page 11 of the Council's 7/18/18 briefing document. The proposal to increase the height at this location to 130' flies in the face of City policies that encourage transitions between zones, and this alone should have resulted in DPD/SDCI rejecting this proposed height increase. The Council must correct this error.

In addition, however, CUCAC and the UDCC have also documented the extent to which doubling the height of this site will forever eliminate a significant view corridor the public now enjoys at the north end of the University Bridge from both sides of the street (please refer to the photos provided in our comments to the City Council for a visual representation of the extent to which these views will be blocked). As we have previously noted, SDCI's assertion that the obstruction of these views can somehow be mitigated is simply not accurate – the effect of doubling the height of the current building is not something that can be designed around or wished away.

If CUCAC (and other community organizations) is/are to have a meaningful role in this process, it/they ought to reasonably be able to expect that high-priority recommendations regarding a highly visible site near the campus boundary such as 37W (and 22W) will be taken seriously - both by

unelected bureaucrats as well as elected officials. We were sorely disappointed in the Council's failure to adopt Councilmember Herbold's amendment that would have incorporated CUCAC's and the UDCC's recommendations regarding this key gateway site into its proposal, and sincerely hope that our strong support for the existing height limit at this location will be reflected in the Council's final policy statement.

Related to that, the UDCC was profoundly disturbed to see in a Seattle Times piece dated 10/12/2018 that the U of W is going to fight essentially every substantive recommendation that was made by CUCAC that the City Council adopted (most notably the reduction in height at 22W and the reduction in SOV mode split to 12% of trips made by students/staff/faculty, which we note does not even count visitors or partner clients of their new so-called "Innovation District"). President Cauce's statement that the UW wants "to be conscious of not giving away our students' future" was indefensible hyperbole, plain and simple. The future of students at the UW will not be negatively affected if two of over 80 possible building sites that are at the edge of the campus the public and surrounding neighborhoods most interact with are reduced, and it is absurd to suggest that it would be.

The UW has a long history of saying they absolutely have to have something their way only to change that position subsequently as circumstances change. The UDCC is reminded of the UW's rejection of numerous community group requests for more student housing to be built as part of the 2003 CMP, only to see the UW reverse itself and do exactly that. The new UW Police Department building "had" to have an indoor firing range - that is until the budget for the project was reduced and the firing range was eliminated.

In a more recent example, the UW is currently planning its first building under the new 2018 CMP (though it has not yet actually been adopted). They are proposing to build a Health Sciences Education facility on the south side of Pacific Street at Site 40S. Back when we were reviewing the Draft CMP, CUCAC had requested that the UW consider lower building heights along Pacific to reduce the possibility of a wall-like effect, and instead increase some building heights in the middle tier of building sites further south, which the UW rejected because they said they needed the full possible height along Pacific Street to meet their plan goals. When CUCAC members were briefed on the proposed new building at their September 2018 meeting, they were informed that because the new Life Sciences Building Greenhouses to the north across Pacific would be blocked by a building at the full 200' height that would be permitted under the new proposed CMP, they would instead only go to 100' at that site to allow sunlight to reach this facility. During this presentation, it also came to light that because the redevelopment of the UW Medical Center (which both CUCAC and the UDCC support) is going to occur in phases it is unclear which future project will incorporate the new view corridor that is proposed to be included there. The UDCC is also concerned by this lack of clarity, and urges the City Council to ensure that this critical mitigation is ultimately implemented.

Finally, while the UDCC will not be taking a position on the City Council's proposal to reduce the UW Parking Cap, we continue to support the other recommendations of the U District Alliance's October 2018 letter regarding housing affordability, transportation, zoning, child care, open space, and small businesses.

As someone who has personally put hundreds of hours into the public process that was supposed to inform the final results of the University of Washington's new Campus Master Plan, I would have a hard time recommending that anyone else participate in CUCAC (where I serve as Co-Chair) or any

other advisory group if their recommendations can so easily be unilaterally rejected by the U of W. I cannot speak for other CUCAC members, but I suspect their frustration will be similar to mine, not to mention the thousands of hours hundreds of other community members have invested in this process. No one likes to be used as part of an empty “check the boxes” exercise, and if the UW can so cavalierly dismiss legitimate community concerns I cannot see the value of wasting my time participating in this sort of process again in the future.

Sincerely,

Matt Fox,
UDCC President

U District Alliance Proposed Comments on UW CMP - October 2018

The U District Alliance for Equity and Livability (UDAEL) (see list on p.3) views the Seattle City Council's Resolution 31839 as an important first step towards mitigating environmental, livability and equity impacts of the University of Washington's (UW) Campus Master Plan (CMP). We ask that the Council, in balancing the UW's institutional needs with equity and livability, consider the additional changes listed below to clarify and strengthen the CMP resolution.

Affordable Housing

The resolution creates a requirement that the UW make a commitment to affordable housing by building 450 units by 2028. The Council did not adopt a proposal to make the UW subject to the Mandatory Housing Affordability requirements for its development.

While the Council did not address the problem of housing cost burdens faced by existing UW employees, it did accept UDAEL's unchallenged analysis that there will be at least 944 new UW employees in households earning less than 80% of AMI and 322 earning less than 50% of AMI. When considering Academic Student Employees and Postdoctoral Scholars, the number is significantly higher. Moreover, the Council recommended a condition that UW provide 450 housing units, with the assumption that UW employees will double up in each unit. This is an unreasonable and unworkable assumption for many reasons. The Alliance calls on the Council to amend the resolution with the following conditions on the UW:

1. To increase the requirement from 450 to at least 1,250 total affordable units to ensure that UW employees with the greatest housing cost burdens will qualify for affordable housing that suits their household size.¹
2. To require the UW housing to include a mix of housing sizes to accommodate families, and to provide childcare onsite for housing.
3. To set an intermediate goal for the UW of producing 450 housing units by 2023.
4. To specify that half of the affordable units be near or on campus, and half be within 45 minutes of campus by public transit and located in transit-oriented development. This would give employees a choice on whether to live on or near campus, and possibly reduce the cost of the required housing.
5. To require that employees and residents be represented in decisions on where to locate housing, and how housing should be constructed, maintained and administered.
6. To require the housing must be non-profit or publicly owned so rents are held affordable in perpetuity (not just 12 to 15 years, or the term of the loan). This prevents

¹ The UW EIS (3.8-27) assumes that students will average two per household. The Resolution uses a similar assumption for staff without evidence that staff can or will live together.

for-profit developers from raising rents to market rates after their investors are paid off and in the case of transferring public land under HB 2382, reaping private equity from land that was previously in public hands.

7. To require that UW contribute more than just land to the effort. They should actually provide the housing.

If the UW does not meet these housing benchmarks, SDCI shall not issue further master use or building permits until the respective benchmarks are achieved.

Transportation

On the environment and livability, the Alliance supports the conditioning of the CMP on reducing the single-occupancy vehicle (SOV) rate to 12 percent, reducing the parking cap to 9,000 spaces and improving bike facilities and pedestrian/bike routes through campus. The Alliance asks that the Council add the following provisions to strengthen and clarify the Council's intentions:

1. **Parking Cap:** As the UDAEL proposed in its December 2017 oral and written comments to the Hearing Examiner, require the UW to include the 750 spaces that support the UW in the old Safeco Building as part of their parking supply. This makes particular sense as 50% of the growth in the UW Master Plan will be on the West Campus, close to the old Safeco Building parking garages. It is our understanding that the 750 spaces are not now included in the existing parking cap.
2. **Residential Parking Zones** – neighborhoods around the UW are concerned that limits on UW parking should be combined with a strong RPZ program for surrounding neighborhoods. Given that the UW is the largest employer in NE Seattle, the UW should be required to pay the total cost of RPZs in residential neighborhoods within the primary and secondary impact zones.
3. **Bicycle/Pedestrian Improvements:** Strike the word "potential" from Potential Bicycle Improvement Strategies and require the University to commit to specific improvements without the caveat "as funding allows". Specifically, Strategy 6, "Improve the capacity of the Burke-Gilman Trail as defined in the Burke-Gilman Design Concept plan" and strike the term "as funding allows" and add "by 2021." This would be in concert with the UDAEL's original petition to the City Council.
4. **Bike Parking:** Strategy 7 should read "Provide adequate bike parking supply to serve specific demand in all four quadrants of the Campus." Strategy 8 should read "Improve quality and security of bike parking through investments to expand covered and high-security parking, lighting, bike lockers and shower facilities in all four quadrants on Campus to meet demand."

5. The Alliance recommends keeping the requirement for achieving a 12% SOV rate by 2024, following the recommendation of the Hearing Examiner. While the UW has now committed to providing UPasses to represented employees, more than half of UW employees and students will not receive an employer-paid UPass in the foreseeable future without a firm deadline on the UW to achieve the 12% goal. In addition, a large percentage of UW employees present and future will not be using the north Link Light Rail since they commute from other areas, so tying the 12% SOV goal to the light rail extension is irrelevant for a majority of UW employees.

Zoning – the Alliance supports CUCAC’s position on height limits for two UW parcels (W22 and W37) at the north end of the University Bridge.

Child Care Vouchers – the Alliance requests that the Council include goals for a joint City-University study and program to institute a child care voucher program for UW employees.

Resolutions on Childcare, Priority Hire, Local and Minority/Women-owned businesses and Renegotiating City-University Agreement (CUA). The Alliance requests an addition to these recitals:

“Whereas the City requests that the University of Washington include a report on progress towards the goals of the above resolutions on City of Seattle priority areas of Childcare, Priority Hire, Local and Minority/Women-owned businesses and the renegotiation of the City-University Agreement in its annual report to the City of Seattle (required by the existing City-University Agreement), and that the UW and the City should widely publicize the annual progress report each year.”

The Alliance looks forward to further Council discussion of these conditions and would welcome the opportunity to answer questions and provide more information at a future Committee or Council meeting.

U District Alliance for Equity and Livability - Amer. Assoc. of Univ. Professors (AAUP)-UW Chapter, Beacon Hill United Methodist Church, Church Council of Greater Seattle, Coalition of Immigrants, Refugees and Communities of Color (CIRCC), Eritrean Association in Greater Seattle, Feet First, Laborers Local 242, Low Income Housing Institute (LIHI), M. L. King County Labor Council, Puget Sound Sage, Roosevelt Neighborhood Association, Seattle Building Trades Council, Seattle Human Services Coalition, SEIU Local 925, SEIU 6, SEIU Health Care 1199NW, Sierra Club, Teamsters Local 117, Transit Riders Union, United Students Against Sweatshops, UAW Local 4121 (Academic Student Employees and Postdoctoral Scholars), Univ. District Community Council, UNITE HERE (Hotel) Local 8, UW Faculty Forward, UW Young Democrats, Wallingford Community Council, WA Community Action Network, WA Federation of State Employees Local 1488, WA State Nurses Association

From: [Cory Crocker](#)
To: [Whitson, Lish](#)
Cc: [Douglas Campbell](#)
Subject: Response to Seattle City Council Preliminary Decision on the UW Campus Master Plan
Date: Friday, October 26, 2018 4:59:53 PM

October 26, 2018

Seattle City Council
C/O Lish Whitson,
City Council Central Staff
Via email to lish.whitson@seattle.gov

Mr. Whitson,

On behalf of the U District Advocates, I wish to offer our response to the City Council's current recommendations and amendments for the University of Washington's 2018 Campus Master Plan.

For UW to be a good neighbor, we strongly suggest the following changes:

TRANSPORTATION

A great example is the U District Mobility Plan, which was released last month. This is a community-led effort that engaged our diverse community, collaborated with the city and transit agencies, and developed a holistic, multi-modal station area mobility plan for the opening of our light rail station in 2021.

The goal was to avoid the fiasco at UW Husky Stadium station with its very disappointing transfers, for lack of effective coordination. At the UD station again, many players, many plans, but only now coordinated with substantial community input that determined:

- A strong priority for the most direct bus transfers at the station, on Brooklyn which borders the station,
- Brooklyn is already designated by the city as a collector arterial, supporting transit,
- OPCD & SDOT insist the Green Street guidelines are compatible with transit service, so the Green Street designation is secondary,
- However, the UW wants to use consistency with the Campus Master Plan as an argument against buses on Brooklyn, except for UW shuttles
- We must remain flexible as mobility will continue to change with development, and so should our street network

1. The Campus Master Plan should support buses on the Brooklyn Green Street.

We ask the city to require UW to design the campus portion of Brooklyn Avenue NE to support bus traffic connecting West Campus to the station (with the most direct transfers) to the existing bus layovers at U Heights, already on Brooklyn.

OPEN SPACE

The proposed growth in the Campus Master Plan will add to the increased density of the adjacent U District, including development on parcels UW owns off campus, and will create further pressure on open space in the heart of the U District:

- GMA and Comp Plan - identified a 5 acre deficit of public open space, which equals two city blocks
- Community has a clear commitment to central public open space
- Parks Plans 2005 & 2015 - highest priority is for a central town square
- Although a great space is planned on the West Campus, the Campus Master Plan fails to address its huge impacts on the adjacent community's need for a central town square.
- Any open space owned by UW (on and off campus) is only partially perceived to be public, as there are restrictions on use that do not apply to democratically-owned public open space.

Following the Seattle 2035 Comprehensive Plan, all neighbors should:

- **UC-P17** Encourage the establishment of a local open space fund that can be used to purchase and improve small parcels when the opportunity arises, and to support programming and maintenance costs.
- **UC-P20** Pursue the creation of a centrally located, flexible open space, ideally within two blocks of the Sound Transit light rail station at Brooklyn and 43rd. Surround this open space with active uses, and manage it to ensure that it is a positive addition to the neighborhood.

2. UW should contribute to a community open space fund annually.

UW should also be required to contribute \$1 million a year to a City-administered open space fund for the U District.

SMALL BUSINESSES

UW failed to study the significant negative economic impacts of the Campus Master Plan on U District small businesses. Unfortunately, neither did the city. Last year, the small businesses themselves raised funds to survey 123 businesses along the Ave.

We discovered that **65%** of our small businesses are minority or woman-owned. **70%** employ minorities or immigrants. **85%** are owner-operators. **Half** are small with staff

of 1-5, with less than 25' storefronts and under 2,000 sqft. And only **10%** own their commercial space. Therefore, they are highly vulnerable to commercial displacement.

UW is a direct competitor and their expansion will include additional on-campus food and drink services that will negatively impact the over 300 small retail businesses in the U District. This displacement is happening now: the first Pagliacci in Seattle (with almost 40 years on the Ave closed this summer), but survives through a licensing agreement on campus.

3. UW should enact an inclusionary local, small businesses program on campus.

The program would guarantee local small business a share of vendor space located in UW buildings across the campus and in the surrounding community.

AUTHORITY

We join the U District Alliance, the University District Community Council, and CUCAC in supporting the City of Seattle's position that it "can impose reasonable requirements on the UW as part of the Campus Master Plan process that will help mitigate the impact of UW growth.

The council has the authority as the Council is not bound by the UW's recommendations, SDCI's acceptance of them, or the Hearing Examiner's decision.

> The city council is our elected voice in these negotiations to represent our community's vision and priorities.

Thank you.

Sincerely,

Cory Crocker, President
Doug Campbell, Treasurer
U District Advocates

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