



City of Seattle

Gregory J. Nickels, Mayor

**Department of Planning and Development**

D. M. Sugimura, Director

**INTERPRETATION OF THE DIRECTOR  
PURSUANT TO SEATTLE MUNICIPAL CODE TITLE 23  
AND SECTION IIC OF THE 2004 CITY-UNIVERSITY AGREEMENT**

**Regarding an Amendment  
to the University of Washington  
Campus Master Plan**

**DPD Interpretation No. 09-001  
(DPD #3009930)**

**Issue raised:**

Theresa Doherty of the University of Washington (UW) has requested this interpretation. The interpretation relates to a proposed amendment to the University's Campus Master Plan ([CMP](#)). The application raises the specific question of whether the proposal constitutes a minor or major amendment to the CMP. Amendments to Major Institutional Master Plans (MIMPs) are subject to provisions of Seattle Municipal Code (SMC) [23.69.035](#). Amendments to the UW Master Plan are subject to the 1998 City-University Agreement, [updated in 2004](#).

The University of Washington proposes to create a new development site in its Central Campus Sector. The proposed site is located southwest of the existing Parrington Hall and abutting George Washington Lane. The intent is to relocate Cunningham Hall to this site, to provide for a future Molecular Engineering Interdisciplinary Academic Building (MEB) at Cunningham Hall's current site. This interpretation addresses the proposed CMP amendment only, and does not constitute review of a project action to establish use for such an action.

**Facts**

The University of Washington completed its Seattle Campus Master Plan in 2003, when the Board of Regents and the City Council adopted it. The CMP provides a broad conceptual framework for future expansion and renovation of the University's programs. It identifies approximate locations of development sites, as well as schematic proposals for future development on such sites. It limits the extent to which the UW may expand, both within individual campus sectors and cumulatively across the entire campus.

The UW proposes to amend the adopted CMP to provide for a new building site, for relocation of an existing building. In a letter to the Department of Planning and Development (DPD) dated October 2, 2008, Ms. Doherty described the factors which drive the proposed CMP change. The proposed MEB is a two-phase project at site 25C, consisting of 77,000 and 80,000 sq. ft., respectively. Its location requires demolition of the Johnson Hall Annex and the relocation of Cunningham Hall. Cunningham Hall is a 5,000 sq. ft<sup>1</sup> wood-frame structure that supports the UW Women's Center. It is one of the original structures remaining from the 1907 Alaska-Yukon-Pacific Exposition (AYP), and is the only designated "women's building" in the state.

Recognizing that Cunningham Hall must be relocated, the UW conducted a site selection process to review potential sites, involving unspecified selection criteria. The committee prioritized the proposed site in consideration of Cunningham's historic importance, its small stature, and its appropriate role as a defining edge element to the south side of Parrington Lawn (Campus Green), a highly valued campus open space.

Ms. Doherty summarized the findings from the University's process in her letter and did not submit further documentation for DPD review. According to Ms. Doherty's letter,

*"Cunningham Hall would be moved to this site and nestled in among the trees and located so that it does not adversely impact the Parrington Lawn. The site has several advantages. The proposed location is close to George Washington Lane, and will have minimum impact upon the openness of Parrington Lawn. ... The site is in close proximity to the core of campus, but enough away from primary pathways to provide privacy for building users. The orientation of the building to the road is very similar in character to the existing siting of the building along Stevens Way.*

The proposed CMP amendment involves establishment of a new development site, identified as 70C, to be added to Table IV-4, page 86 of the CMP. The site would be located adjacent to George Washington Lane and Parrington Hall, on the south side of Parrington Lawn. The proposed development site is not environmentally critical, and it is not located within 200' of the shoreline.

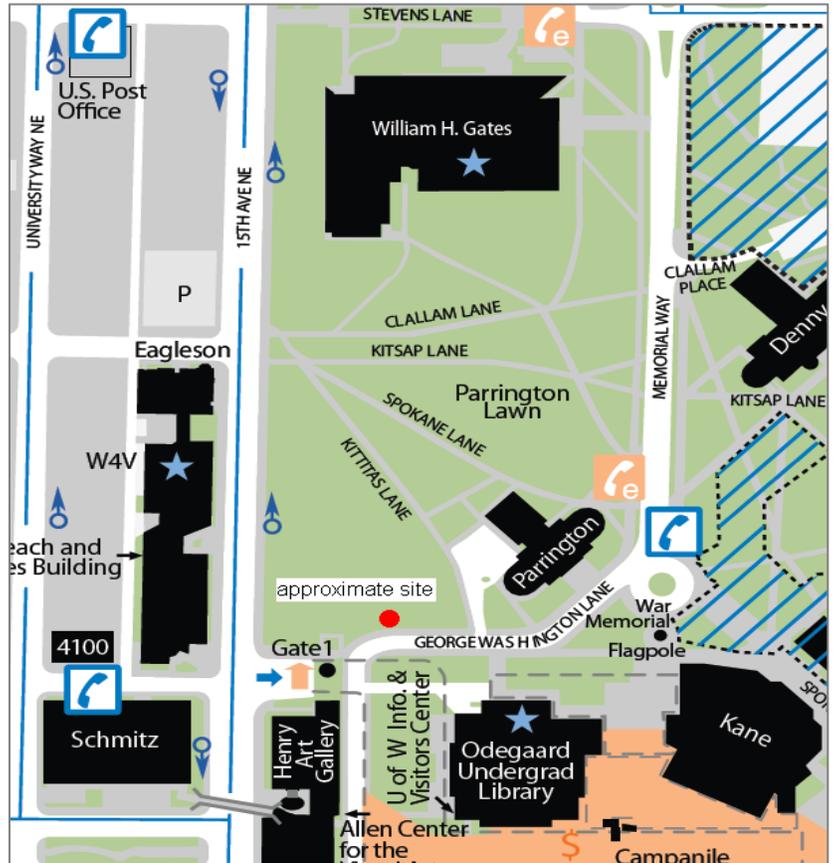


Figure 1, Approximate location of the Cunningham Hall building site.

<sup>1</sup> The structure has a footprint of roughly 2,500 sq. ft.

The proposed plan amendment would result in no change in the building area allocated to the Central Campus Sector. Considered in the context of other projects envisioned for the sector, the relocation would not exceed the limit of 120% of the gross building area allocated to this sector, as provided in the CMP. The relocation would not exceed the campus-wide expansion limit of 3,000,000 gsf. The existing Cunningham Hall is two stories, an appropriate scale in the context of Parrington Hall and the adjacent lawn, and it is within the height limit prescribed by the CMP.

### **Code standards and City-University agreement**

Underlying zoning for the new development site is residential Midrise, modified by a Major Institution Overlay (MIO). The CMP defines development standards within the MIO, and the proposed update does not contemplate changes to such standards. Allowed height is 105' for UW structures on the proposed site. The current use is allowed outright in the overlay zone.

SMC [23.69.035](#) regulates changes to Major Institution Master Plans (MIMPs), which include the CMP. The [City University agreement](#) further outlines the process for amending the CMP.

The DPD Director is to review the proposed plan change and determine, in the form of an interpretation, whether it is a minor or major amendment.

### **Comment by CUCAC**

DPD received written comments from the City University Community Advisory Committee (CUCAC) dated October 22, 2008. The Committee argues that DPD should reject the proposed amendment, and takes no position about whether it should be considered minor or major.

The CUCAC letter voices strong opposition to the proposed amendment, stating that it is “plainly inconsistent with the Open Space Policies and General Site Development Policies of the CMP, and would create a precedent that would allow further encroachments onto this and other open spaces on the U of W campus. The letter cites CMP language about “unique and significant landscapes” (CMP pg 30 and 31), and various CMP references to Parrington Lawn. CUCAC maintains that the green is a treasured open space, and that an added building site here is inconsistent with the Master Plan. CUCAC also identifies its more general concern that CMP amendments should not create new development sites, as it “undermines the integrity and predictability of the Plan”.

### **Analysis**

DPD acknowledges CUCAC’s stated concerns, and has reviewed the CMP language related to identification of building sites and conservation of campus open spaces. Campus Green is consistently identified as a principal open space and a valued park-like resource for pedestrians. Aspects of the green that define its character include its relative openness, its partial tree cover and general lack of understory vegetation, its network of paved pathways, its physical separation from vehicular traffic, and its border elements, which consist largely of trees, modern and historic campus structures, and a topographic break at the western campus edge (15<sup>th</sup> Ave NE). The proposed relocation of Cunningham Hall would introduce a new edge element to the south of the green. The space is currently planted with lawn, an evenly distributed line of trees at the northern edge of George Washington Ln, and a swath of ivy along a low break in grade. As noted in Ms. Doherty’s letter, Cunningham Hall represents a footprint of 2,500 sq. ft., or less than 1% of the overall open space represented by the lawn. Seen from Parrington Lawn, Cunningham Hall would partially obscure views of the north and west façades of Odegaard Library, located more than 200' to the southwest.

The proposed CMP amendment contemplates relocation of an existing structure smaller than 12,000 sq. ft., to a previously undefined site. As such, the proposed CMP update satisfies criteria associated with exempt changes (SMC [23.69.035 B](#) and subsection C2 of the City University Agreement). However, the proposed development site is also located in an area designated by the CMP as open space. As such, *“the amendment is a ... decrease in size of designated open space, and the proposal does not go beyond the minimum necessary to afford relief and will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity in which the Major Institution is located.”* (SMC [23.69.035 D2](#)).

Ms. Doherty’s letter states (pg 8), *“While the proposed site is in a significant open space, the historic aspects of Cunningham Hall need to be preserved in an equally significant area. The small size of Cunningham Hall minimizes the impact on the open space.”* DPD concurs with this assessment. It allows for the preservation and continued use of Cunningham Hall, while also providing for reasonable development of the MEB, for reasons enumerated in the UW letter, which include allowing the relocated structure to be occupied during the 2-year construction timeframe, resolving disparate scales of the existing and proposed structures, and the resolution of MEB design constraints, were Cunningham to remain in place. DPD identifies no material detriment to the public welfare. DPD recognizes that amendment would result in a change to the existing open space, but identifies no injury to the property or its improvements.

The proposed new development site is not environmentally critical, and the extent of development contemplated for the site is within the prescribed limits established by the CMP. DPD considers the proposed amendment to be minor, as it is consistent with the general goals of the CMP, and it would not result in significantly greater impacts than those contemplated in the CMP and its associated EIS.

The proposed change is not a major amendment, as it meets criterion 4(b) of the City University Agreement. It does not affect height limits or other development standards, it does not expand the MIO, it has no effect on housing stock in the Primary or Secondary Impact Zone, it does not modify the University’s TMP, the proposed relocation would not require Council approval, and it does not exceed limits for floor area or parking established in the CMP.

### **Decision**

The proposed addition of development site 70c to the Campus Master Plan, for the purpose of a future relocation of Cunningham Hall, is a **minor amendment**.

Entered this 12<sup>th</sup> day of February, 2009.

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(signature on file)  
Scott A. Ringgold  
DPD Land Use Planner