

I appreciated your rational presentation and fielding of questions amid the neighborhood storm this evening at University Heights Community Forum. Given the fact that the forum was organized by the Displacement Coalition and the various neighborhood organizations opposed to the up zone – it did seem a little unbalanced. I think you did well in presenting the City's attempts to solve a myriad of issues with the U District up zone plan.

If there had been room at the mic, I would have chimed in with advocacy for the up - zone development. I do not accuse the City, or the UW, of being blind to the homeless issue, the affordable housing issue, or the lack of social services issue. From what I read, watch, hear, etc I think the Mayor, City Council, and the UW as well, get all that. I think they have the best interest of the City and the U District at heart and are doing their best to solve these problems. The portrayal of anybody down at City Hall as community crushing villains is extremely short sighted in my mind.

The increased development with incentives and potential revenue for low income housing is the right approach. A laissez faire, nimby, 'don't change my home' is not going to revitalize the U District, not going to solve the housing crisis or homeless crisis, nor is it going to bring back the old neighborhoods that most the opposition groups harken to. I believe the City's efforts at controlled densification, neighborhood revitalization, transportation hubs - as opposed to limitless parking garages - are creating urban villages that are transforming into new neighborhoods as we speak.

Of course neighborhoods are going to be transformed and look different than they did in the 20th century, just as the 20th century neighborhoods transformed from the 18th and 19th centuries. We can see what 'no development' has done for the U District in the past 50 years. UW's and the City's recent urban village redevelopment below 40th – to me – looks like revitalization. South Lake Union? As far as I'm concerned, it's safe, clean, sidewalk friendly, and it works. Yes, it has gotten more expensive, and yes it does move people around - but this type of densification is what cities evolve into. Where's the rub. And 'broken transportation'? - (are they kidding?) The Mercer corridor has been a mess since I was in college 40 years ago. Now it finally moves.

In summary, I support the City's efforts to revitalize our city with dense urban neighborhoods. I encourage the City to go forward with implementing transportation hubs (Light Rail, Community Transit, and a well-connected metro bus system) and **not** to use our valuable land resources for parking garages and parking lots. Using the development incentives, let's build as much housing, (low income, affordable, desirable) housing as possible. To that I add, keep the pressure on the City, (and by that I mean the taxpayers/citizens/developers etc) to create a revenue stream to fund social service programs. I was glad to hear that this incentive component is in the report. Please do all you can to keep this in the mix as well.

Again, thanks for your work in helping to solve these difficult issues.

Can't make the meeting, but know as a seattle resident who works within the city, an upzone would benefit the most people: easier access to jobs, housing, and fun. please don't worry about sightlines or shadows or any of that. access to light rail and the U is paramount.

As a resident of North Seattle who frequently utilizes the services of the U district's commercial area, I strongly support the maximum up zone possible for the U district.

In fact, I would support the complete elimination of height and FAR limitations.

I believe it is an environmental and social imperative that we allow the maximum number of people the opportunity to live car free in this already densely developed urban area.

I am relatively pleased with the proposed up zone in the U District.

My one comment: I believe the district would be better served with the entire University Way N.E. up zoned to 85 feet. An 85 ft height limit on the Ave would encourage development further north than the proposed cut off at 45th.

Thank you for your diligent work to this point.

As a Seattle resident and homeowner, I feel that it is important to express my support for the proposed U District rezoning.

We need to maximize density around the light rail stations to enable a carbon free future for Seattle.

I am not a housing nutbag. I own a couple small income properties. I own them because I love Seattle and they provide some income to me. They are in good repair and pretty, though not top end. They are reasonably priced. To upzone the U District is a slap in the face of Seattleites who are already here for an imagined influx of people who have little interest in becoming the kind of Seattle people who would bother to write this email. I lived in San Francisco for 15 years, 25 years ago. I saw this happening then. SF is no longer a place of much interest. It is Disneyland—every apartment has granite countertops and bamboo flooring, and all the new ones are exorbitant in monthly rental price. There, neither the building owners (who change every couple of years) nor the tenants (same) give a damn about the future of that city. They are there to make money. In the U District, raising the limits from 6 stories to 24-30 stories is inane. Six stories was already too much for block after block, instead of interspersed, but these monsters are unacceptable.

Working people need a place to live in this city. Please stop forcing people out of affordable housing by allowing developers to take every piece of land for “highest and best use,” which means the most money that could be made off of it. The new apartments are priced out-of-sync with the neighborhoods. I could condo my buildings. I could sell them to the many folk who contact me constantly to tear down and rebuild. I could “upgrade” them and charge a hellalot more. But I am happy to have good tenants who like to live there with each other, people who give a damn. It helps me with my income and, like many longtime landlords, I try to balance how much I need (not WANT) and what might be affordable for them.

Please stop kowtowing to developers and future residents (transients) who are coming here to make money and move along. Please think about what we would like Seattle to be. SF just followed the money. That should not be who we are.

I am sending copies of this to my tenants, in hope they will write you as well. I somehow believe that they will feel similarly to me.

I write in support of draft zoning recommendations that would increase allowable height and density in the core of the U District neighborhood. I believe these recommendations will improve affordability, livability, and accessibility for current and future residents, business owners, and visitors to one of Seattle's best neighborhoods.

I appreciate OPCD's commitment to receiving extensive input into this process to-date, including participating in over 300 community meetings since 2011. These draft recommendations are a product of extensive input from the community and interested individuals who know that the U District needs to grow and change in order to become a more vibrant place.

If anything, the draft zoning recommendations could be more aggressive in supporting height and density in one of Seattle's six urban centers. But, I recognize that these recommendations have gone through extensive input to-date and I appreciate the middle ground that has been reached.

What I do not support are additional last-minute efforts to circumvent the process made by some who do not support the HALA recommendations, or this rezone, and instead suggest that no-change to the U District is a viable alternative. These last-ditch efforts to undermine the 5-year process that has resulted in the draft recommendations should be ignored.

Thank you again and I look forward to seeing the draft recommendations being implemented in their current form.

This is a comment on the proposed up-zoning plan for the area between 15th N.E. and I-5.

I'm sorry, but this is a crazy plan from the transportation perspective alone. Does anyone in City government ever sit through rush traffic in the UW corridor? Having a light rail station out there is supposed to help the *current* crush of traffic, not anything *more* that would arrive with this density plan.

I worked at the UW for 25 years, and while we had incentives for carpooling and using Metro Transit, there are still built-in reasons for SOV use at the UW. Here are just a few: (1) Patients arriving and departing from the clinics and the hospital; faculty who do off-site research in places that are relatively inaccessible to transit; and (3) working mothers who must immediately transit to child care after work.

And somewhere north of the Windermere neighborhood there are already businesses creating commuters, because the amount of traffic hitting 25th NE (going southbound) from both exiting UW workers/students and others northeast of 25th NE is tremendous from 4 pm on in the afternoons.

Approving this plan is like giving the UW permission to eat the City. What about the new commuters that will want to use I-5? We already know that I-5 southbound is in almost continuous gridlock starting at the 45th Street on-ramp except for about 4 hours daily during the daylight hours.

There has to be a time when the City puts its foot down when it comes to growth in the University District, and forces the UW to consider other cities (besides Tacoma and Bothell) for its expansion needs.

For those of us who've lived in Seattle 30 years or more, one of its greatest attractions was that it was NOT New York City or Los Angeles, with all the congestion and pollution that portends. But the race for

more density here, and the unmitigated greed of developers is pushing us toward an even uglier version of those cities. Already the blocks between NE 45th Street and NE 50th on 11th NE are like a concrete canyon which is unrelieved by color because the City code is allowing developers to build right up to sidewalks with no setbacks, and the only greenery left are new little trees in the sidewalk area. Seeing GREEN makes Seattle beautiful; seeing just the exterior of apartment blocks is making it ugly in many sections of the city.

Please do not approve these extreme heights in the U. District, and consider the tremendous impact that more traffic will create. Thank you for your attention to my comment.

Just sending a message in support of the UDistrict upzone plan. Please upzone as much as possible. We need to make the best use possible of our light rail investments.

Please also upzone Northgate accordingly. (I live in the Northgate urban center... and its not very urban yet).

You have lots of voices out here that support you, we just can't all make it to public meetings.

I support the UDistrict Design Recommendations that encourage a vibrant community around public transit and encourage an adequate amount of affordable housing.

The UW district must not be redeveloped as planned. It must remain affordable to college students and low-income people and workers. You are losing the spirit and individuality of Seattle neighborhoods by destroying homes and putting up so-called "affordable" apartments. Where are all the Seattleites you displace supposed to live?

The developers are running city government and getting so many deals. You have got to say NO. None of the money is going to improve the infrastructure of Seattle-roads, sewers. Developers built something that won't last and pay minimal amounts for the surrounding infrastructure improvements.

Take away the water and mountains, and Seattle is a rather drab city, architecturally speaking. So why does the proposal do nothing to promote the construction of attractive buildings and housing? If recent and current building projects are any indication, the intent is the opposite of beautification, as so many new buildings are butt-ugly boxes, slab-sided monstrosities, eyesores from every angle.

I have a suggestion that will make future construction more attractive — and more livable, too. Let us take seriously the word "Livability" in HALA rather than ignoring it. Here's how:

Add to the city building code the following requirements for new multi-family residential construction (and for mixed use buildings that include a multi-family residential component):

- 1) Every unit in a multi-family residence must have a terrace.
- 2) Every unit in a multi-family residence must be open to the outside on two sides (either at a corner or back-and-front). Think climate change and the need for more natural ventilation!
- 3) No exterior surface of a multi-family residence may be flat for a span more than the width of one unit in the building.

If applying all three rules might seem too much a burden, then require builders to apply any two of them.

Yes, these rules might add something to the cost of construction, but not much. I checked with an architect friend. Besides, if European countries with substantially lower incomes per person can build on these lines, why not wealthy, booming Seattle? At least, for god's sake, consider the appearance and comfort of the city you are building.

As a 20 year resident of the University District and architect for 16 years, I am horrified to read the recent Draft EIS for this historic neighborhood. Responsible developments involves upzoning a district by 2-3 stories at a time maximum. Replacing single family dwellings with 340' tall towers will transform a friendly residential neighborhood that has neighborhood commercial uses into a hostile, crime-ridden place that feels like Wall Street or wind-tunnel downtown Chicago. Already the newish building (Lothlorien) now casts University Way into shadow for the entire morning and well into the mid-day. This is poor urban design in a city that rarely sees the sun. The streets of the University District were never designed to accomodate such towering buildings. The Ave shouldn't be more than 4 stories, period, due to the narrow street size and 2-3 is probably optimal south of 50th. The residential neighborhoods cannot accomodate more than 3 stories without disrupting the fabric. Wider streets like 45th can accomodate 6-8 stories. Towers such as Mt. Safeco/UW are an embarrassing eyesore that attest to past failures in responsible planning and should have never been built. The streets are already at capacity for traffic flows and cannot accomodate an increased flow of motor vehicles.

I have studied urban planning and there is no study ever conducted that would recommend such a drastic shift in urban density overnight. Greed has already been driving talent away from Seattle and as long as you continue your assault upon the creative centers of this once-great city, you will see a continuing disappearance of those who create the value that you now capitalise upon. Our children, the university students, are not your guinea pigs. Preserve the historic and residential character of this neighborhood; don't turn it into another Downtown Seattle.

Highrise belongs Downtown, not in the neighborhoods. This should go without saying, so why doesn't it? The U-District now, and then which neighborhood is next? The next one to get a metro station? Why not put a metro station where development is actually NEEDED or WANTED rather than where there is already too much?

Dear City Government;

I am reminded of Robert Moses and the Fall of New York. I am reminded of how his projects (many illegal), decimated the green spaces and turned it more into the concrete jungle we see today. The tragic stories still have not been fully told and remember, his work also tore down a lot of Low Income Tenements, again the full tragedies have not been told.

Creation of a Glass Corporate Jungle is not a Plan for Growth.

Upzone is nothing more than a repeat of history, only now the city of Seattle is turning everything we see into a glass High Rise Jungle. Seattle needs to be a family friendly great place to work and play, And the University District needs to be included in this family friendly, workaday, play and living in Seattle. Upzoning is just creating more Corporate Structure for Corporate. Office spaces already are at a premium but when you research it, there is a lot of open office spaces in this country.

We need true plans for growth to include all strata of society. And we all know it is true.

NO UPZONES!

We are opposed to the proposed upzones in the University District. The University District is a historic and vibrant neighborhood that deserves to be protected. The city should require a *Displacement Risk Analysis* to be done for each neighborhood prior to upzoning. We support [Livable U District's](#) call to immediately suspend current on-going plans to upzone the University District until the following measures are adopted: requiring developers to pay impact fees, traffic and parking mitigation, anti-displacement strategy that includes one-for-one replacement of low cost housing, increased open space, historic preservation plan, tree protections, and homeless services.

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Neighborhood Plans & Design Guidelines have been removed. While the Seattle 2035 website shows Neighborhood Plans on it, the actual language requiring them to be followed is gone from the proposed Seattle 2035 Comprehensive Plan. I want to see neighborhoods have the voice to say what they desire for their neighborhoods.... The city has failed to address current infrastructure needs due to growth. The sewers, the roads, public transit, parks, open spaces, schools, community centers, libraries, emergency services, etc., – where is the plan and funding to accommodate the increased demand on the things that make communities desirable? Why doesn't Seattle charge and collect impact fees like our neighboring towns and cities do? I would like to see our community have sufficient roads, parks schools etc for our growing population....The city no longer requires new construction within urban villages to provide parking, a.k.a. car storage, while at the same time it's encouraging multi-residential buildings to go big. While there are those who might argue that the city does not owe anyone a place to park cars, Seattle (along with the rest of the U.S.A.) has prioritized travel by automobile over any other method of travel since the 1930s. Require that the city investigate non-punitive routes, other than simply making it inconvenient to park, to change this legacy, especially as the automobile industry continues to bombard us with car commercials and advertisements and current public transportation is lacking. I would like to see a requirement for parking sufficient parking places in all new apartment structures being built.

This request is to support the LIVABLE U DISTRICT'S call to suspend on going plans to upzone the , University district until a Displacement Risk analysis is done. Other things like impact fees are need to be collected from developers, traffic and parking mitigation is addressed.,

There need to be plans for increased open space, tree protection, replacement of low cost housing on a one for one basis, homeless services and a historic preservation.

The district should not be turned in to another downtown and destroy the smaller scale nature adjacent to a college campus. Look at University village for a success story of new development not a Manhattan look alike. The U District has had a large number of poor on the streets and in low cost housing who will be run out by developers. Where is a plan?

I have lived just outside the U District, in east Wallingford, for 15 years. I support a maximum density rezone of the U District including 320' building heights. I want high density, Vancouver BC-style development around the new Link stations. This development, however, should include affordable housing set-asides, as well as significant improvements to pedestrian and bicycle facilities, especially for station access.

Please plan for what we really need for the future.

Hello! I'm so very excited for the new urban design for the U District. I was wondering if I may contribute some input for the project. It would be really really nice to have the two main streets (the Ave and the

Brooklyn) be smoke free. I know some cities designated some main streets to be smoke free because so many people are walking by. Right now, it's really hard to go to a restaurant on the AVE without inhaling lots of second hand smoke. I know this is particularly harmful for people with respiratory problems or are pregnant. The situation of tobacco second hand smoke is so bad that it's quite often for someone to have to continue enduring second hand smoke even inside the restaurant if the windows or doors are open. Moreover, it's also very hard to be waiting at a bus stop without picking up constant second hand smoke, even though people aren't supposed to do that.

I am super excited for the new urban design at the U District, and would really like to see if designated smoking area or smoke free regulations could be incorporated in the new design. I believe this will be beneficial to people living in the area, and will also be a good motivator for people who have long been wanted to kick the smoking habit for health. Thank you so much for everything you've done for the city. I really appreciate it.

Thank you for giving us so much time to dialogue with you the other day in Suzzallo. I hope everyone learned something they could take away from that meeting. I'd like to (re)iterate my areas of concern:

-We need to find a way to push MR zoning west and north to prevent SFH from bordering the freeway. I realize this will not happen during this pass, but plans for the future must be made.

-Tower spacing concerns: It's easy to look at the Metropolitan Apartment Tower and 1918 8th, or the Escala and its two future neighbors and start spreading doom and gloom about 24 hours of shadow, but these are extreme cases. I estimate that there is ~100 or more feet between the UW Tower and the Deca Hotel. I believe 80-100 feet of separation for tower faces should be fine above 65 or 85 feet. For tower corners, I think 20 feet is plenty (i.e. two towers kitty-corner, but on the same block).

-Floorplates: Please increase the allowable FAR for residential, hotel, and commercial uses. Shading is really not as big a concern as opposition groups claim. A 20% increase in floor area can have huge economic impact, but only increase the width of a building face by a few percent.

-Southern extension: I am excited to see what the future upzone of the south and west campus areas holds. In preparation for that, I would like to see the 240' proposed zone increased to 340'.

-Retail/ped streets: 42nd, 43rd, and 47th streets need to have a retail and pedestrian focus to increase day and evening use, and in the case of 43rd, take advantage of the Link traffic.

-Public space: a 43rd and University plaza does make sense, provided it follows the principles of good public square design. Allow flat-faced, non-modulated buildings to act as an enclosure of the space up to 5 storeys, and require narrow-width store frontage around the perimeters of the square. A plaza further west will not perform as well. In the future, look at creating a large park out of former SFH areas in the norther sections of the U-District.

As always, bear in mind that neighborhood character is established by the streetscapes and urban design that occur below 30 feet, regardless of the height of the buildings. The additional density provided by the greater upzone will create more social capital, transit ridership, economic growth, and simultaneously reduce car-dependency and GHG output. The Ave is in need of more residents and a greater variety of residents to provide 24-hour activation, eyes-on-the-street, and reduced crime.

Hello,

I am writing in support of the U District rezone. The neighborhood has a world-class university. It is highly connected to transportation, with Link rail, the 520 bridge and I-5, bus hubs, the Burke-Gilman trail and great walk-ability. It is a job and retail center. With Seattle's booming job and population growth, it only makes sense that more people will be living and working in the area.

My family owns a home a few miles North of UW, but we were almost priced out of Seattle entirely. If we were looking for a house today, our options would be much worse. My coworkers are increasingly finding it difficult to find a place to buy, even with great jobs and down payments at the ready. They are being pushed out farther and farther, which leads to transportation difficulties including road congestion and the need for more transit.

Members of my extended family also rent in the area, and have found the options to be extremely limited. It is a constant cause for concern. Affordable rental units are very difficult to find and any increase in the housing stock across the city will take the pressure off the yearly increases.

I am familiar with several entrepreneurial projects that have incubated with help from UW. It would be best if they had an option to grow without having to immediately move to an entirely different area to keep their budgets manageable. The ability to recruit from the student body and to have access to the livability benefits of the area is an important advantage.

My alma mater, the University of Wisconsin, reminds me of Washington's UW campus in many ways. It has built up extensively in recent years, putting in towers where there were once only one or two story buildings. Quite frankly I'm surprised that Seattle's U District hasn't followed suit. The change has been quite positive and while it's sad to see a few familiar buildings go, the institution and the area are none the worse for wear.

Howdy,

I would encourage the OPCD and city council to maximize the opportunity that the light rail infrastructure provides the city.

This means upzoning to allow for denser uses of land within the walk/bike shed of the light rail station.

Specifically I am for raising height limits and rezoning as needed to allow for much more intense development.

The upzoning plans for the U District and Wallingford are unnecessary, unfeasible, and detrimental to the neighborhoods and their residents.

I absolutely oppose any upzoning in either area.

In the U District, 320 foot high towers will severely decrease the livability of the area.

Developers will certainly benefit, especially if they aren't required to pay any impact fees and if coding and land use restrictions are relaxed.

But, the residents will end up living in a densely packed downtown without adequate transportation, green space or infrastructure.

And, no affordable housing will actually be created in the U District itself unless that is mandated.

All the development that has already occurred has caused rent to go up, not down. More development won't help that.

The issues in Wallingford are the same. As a home owner in Wallingford, I do not want families taxed until they sell to developers, leading to apartment complexes on every block.

The city and county have not guaranteed the investments in transportation and green space necessary to support more density.

If you can't provide light rail and additional buses, we can't add more development to the neighborhood.

There are already issues with sewer and parking that will get many times worse under your current HALA and land use proposals.

There is already sufficient space to develop housing units to meet the neighborhoods growth target, but these developments need to be along arterial streets only, with close access to transportation.

They need to have setbacks, height limits, provide some onsite parking, and ideally have mixed use commercial space.

And developers need to pay impact fees to offset the social cost of added units.

The city council and HALA planners also need to accept the fact that none of this development will create any affordable housing on its own, unless that is mandated.

Please don't ruin these neighborhoods for the current residents in the name of affordable housing that won't be realized.

I am writing in support of the plans to upzone the U-District to accommodate increased housing density and right-sized commercial development.

As a resident of the Ballard Urban Village, I can speak firsthand about what such change will bring. It can be jolting, no doubt about it. I had construction taking place next door to us on both sides for a year and a half not long ago.

And change is necessary to increase the overall housing stock in the City of Seattle. This will help to alleviate the effects of skyrocketing home values and rents due to artificial limits brought about by limiting new housing development. With fully 65% of the zoning in Seattle set for single-family structures, there needs to be drastic changes with allowing mixed use and increasing amounts of the "missing middle" types of development that have been shrinking for decades.

While I do not live in the U-District, I visit there on personal business multiple times a month. I have a great interest that it develops in ways that will be a model going forward for other neighborhoods, like Ballard and others.

We don't want to be like San Francisco or Vancouver, BC -- great cities trapped by their zoning regulations. Let's follow Portland's lead(!) and start allowing for more varied types of living and commercial structures to reflect the diversity and values of the people who live here now and who will move here in the future.

Do the right thing -- upzone.

Hi,

I just want to say that I think if the tax budget went for free bus service rather than more freeway lanes, I think that more people would be taking the bus. It would have to be more convenient, though. Smaller, more frequent busses.

Brief comment: the upzone doesn't go far enough. We're adding jobs at roughly 3x the rate that we're adding housing, and because of our slow processes this is one of the few upzones we'll have a chance to add in this construction cycle. Please consider taller, with higher FAR, less setback, over a larger area, and with lower MIZ requirements. We need more housing now, and far more than this upzone will accommodate.

Among other properties, my company, ___ owns the University Manor apartments at ___ N.E. 43rd Street, which is in the heart of the U-District and just one block south of the light rail station scheduled to open in 2021. ___ is a local, Seattle company and our strategy is to buy and hold properties as long-term investments. We plan to be invested in the U-District for many years and are very interested in the changes that will come to this area over the coming decades.

___ commented on the Draft U-District Urban Design EIS and we are happy to see the Draft U-District Zoning Proposal and Urban Design Recommendations ("Draft Recommendations") embrace increased building heights and density near the University District light rail station. Specifically, the proposed SM-U 85-240 and SM-U 85-320 zones are a major improvement over the existing NC3-65 and similar zones, which would not provide the height and density needed to maximize the benefit of the light rail connection between the University of Washington and the fastgrowing businesses located along the present and future light rail lines.

We are at an important turning point in the history of Seattle. The City is growing and will continue to grow rapidly over the coming decades. The amazing rate of growth will bring opportunities and challenges to area. The University of Washington is poised to provide the skilled workers of tomorrow and to serve as an incubator for groundbreaking new businesses. The UDistrict needs to serve these interests and can do so without losing the essence of what makes it a special place. The Draft Recommendations strike the appropriate balance between embracing the UDistrict's exciting future without sacrificing its storied past.

With the U-District light rail station opening in just a few years, the University will be connected to major employers and innovative new businesses throughout the region like never before. This is the City's opportunity to encourage the type of density needed to support the unprecedented, multi-billion dollar investment in our regional light rail system and to support the continued success of the University of Washington and our regional economy. **Please seize this opportunity and move forward with the zoning height and densities shown in the Draft Recommendations.**

I am a homeowner in the Roosevelt neighborhood and a member of a faith community located in the U-District. I ride my bicycle through the U-District nearly everyday. I strongly support the design proposal including the rezones and the revised design guidelines. I have a few specific comments.

1. By all means, keep the affordable housing requirements, maybe even expand them. The U-District is a perfect place for affordable housing.
2. The new design standards look pretty good. I think many people fear a neighborhood made of chunky blocks of buildings squished side-by-side. You need to show them how the design standards will prevent that.
3. The open space requirements for large projects are good, but will any of it be public open space? How will the City ensure that open space stays open, permanently?
4. We need retail space requirements that allow for and encourage a wide variety of retail enterprises from space big enough for a new grocery store or two to the small spaces that encourage vibrant, street-level small restaurants, coffee shops, and other businesses.
5. Why are there no plans for green streets north of 45th? 52nd would be a good choice to connect the planned rebuild of the U-District Y, the University Heights center, and potential entertainment and shopping venues on the north end of University Way.

Thank you for your work on this. I'm excited to see how the U-District and surrounding neighborhoods change as we get light rail.

Hello,

I am a constituent living near Ravenna Park and do spend time in the U District and attend church there. I am in favor of up zoning. While I know that there is local opposition to the allowing taller buildings, I see the District changing and know it will continue to grow with light rail coming. The way to address this growth is with thoughtful up-zoning. Impact fee for developers for infrastructure costs and one-to-

one replacement of low income housing lost will help to maintain the U District we love while dealing with the reality of growth.

Your letter of 5/26/16 concerning the University District EIS Addendum (EISA) states the last day for public comment is 6/27/16. Please accept my comments.

The EISA states: "The modification does not result in any new significant adverse impact..."

I support the following language in the EISA: "The purpose of this EIS Addendum is to incorporate the Mandatory Housing Affordability (MHA) recommendations of HALA in the upzone portion of the proposed Action." This language states the proposed EISA changes will be within the FEIS proposed zoning change boundaries presented in the "U District Urban Design Alternatives Final EIS (January 2015)."

However the language in sections 1.3 and 2.1 of the EISA are at odds with the above paragraph as it calls for inclusion in the "U District Study Area (DEIS pp.2-1 – 2-3 and FEIS pp. 1-1 – 1-5)." The 'study area' is the whole neighborhood including Single Family zoned areas: "This Addendum updates the analysis of impacts to affordable housing and mitigation for impacts to affordable housing with the implementation of HALA recommendations..."

A summary expansion of the FEIS zoning areas to embrace HALA throughout the "U District Study Area" is outside the scope of this Addendum, offers "significant adverse impact" and should not be considered.

Adding the MHA subsection of HALA to the FEIS defined zoning impact areas is acceptable. If the intention of this EISA is to expand the HALA initiative to the 'whole neighborhood' then this Addendum should be rejected.

I think it is fabulous that a plan is in placed to revamp the unsafe and rundown U. District.

My main ask of you is to keep **Safety** as a top priority in your list. In the 20 plus years I have been living in the U District, I have had my car stolen 4 times (it never came back after the 4th time), my bicycles gone from my own garage, my car broken into a bunch of times, people doing drugs on the back of my house, people stashing stolen goods in my own backyard. But what concerns me the most is the safety of the people who live in the neighborhood, our community has been mugged, beaten, abused, robbed, etc. About a year ago, my nephew's had his backpack stolen from the YMCA! And as life would have it, we saw the person who stole it, wearing it happily and staffing it with drugs and such down the Ave. A police report was filed, we never heard back.

So yes, it excited me that we will have a state or the art transportation system, but what good does it do to our people when we are afraid to walk down the street or are solicited for drugs, sex, or are given any other unwelcome remark. No fancy train can replace safety.

I'd like to hear how you plan to address these concerns.

Greetings: My family has owned commercial property in the University District for many decades. We have invested greatly of our time and money in trying to make the University District a vibrant community for both business and residents. We have stood by the District in the lean times, when others were ready to write it off as a failure that could not be salvaged. Although there is still much that needs to be improved in the District, we are happy that we have stuck with our commitment to make it better. While I generally think the proposed University District Plan has merit, I do know that it is just one of many such plans over the years, some of which I worked on, that have come and gone. I also know that all such plans suffer from a variety of systemic problems in that no one, least of all the City of Seattle, has a crystal ball that can predict what future changes might occur (what City growth plan in 2005 predicted the arrival of Amazon in South Lake Union?) and no plan, particularly when weighted in favor of the opinions of so-called stakeholders who have no actual stake, can anticipate or compel the future investment activities of those who actually do the investing. With that in mind I think it is a catastrophic error in judgment to leave the zoning on the Ave essentially unchanged. If the City really wants to create a denser urban environment around one of the few light rail stations in the City, it should increase the zoning broadly around that station and let the market place decide where the best opportunities for development might exist. The Ave is already largely removed from the residential areas of the University District and thus commercial development there would be the least impactful of the current residents. Some obscure notion of retaining the cutesiness of the Ave is fairly laughable since few of the professed admirers of that cutesiness currently set foot on the Ave to patronize its struggling retailers, and will be even less likely to in the future when more compelling retail competitors spring up on Brooklyn or 12th or wherever. The City should give the business and development community a broad palette of choices to best create the exciting University District of the future that we all desire and deserve. I appreciate your consideration of my opinions and hope that the final University District Plan will more fairly distribute the future development opportunities of the District so that in twenty years we will all be proud of what the University District has become.

Our family has lived in the University Park Neighborhood since 1955. I was reviewing the massive University District Up-Zone Plan, and as I tried to decipher its many nuances, I wrote down the following questions and concerns. Could you help me resolve them?

1. What is the definition of the term 'apartment'? What is the definition of a dwelling unit? The section covering Density Limits in the LR Zone states this: *"In LR1 zones [comma] no apartment shall contain more than three dwelling units..."* (page 10) Does this refer to a triplex?
2. In spite of that limit, the following loophole is also included: *"One additional dwelling unit may be added to an existing residential use regardless of the density restricts ... [This includes # 1 above]. An additional unit is allowed only if the proposed additional unit is to be located entirely within an existing structure, and no additional floor area is proposed to be added to the existing structure."* (page 10) This section is very worrisome to me and conjures up the following concerns:
 - a. Is there a code that requires that each dwelling unit be a certain minimum square footage of livable space? If not, this exception just allows a landlord the ability to cram another rental

unit into his building, or in our case, another 8 unrelated adults. Thus the proposed density increase is not as benign as it might appear at first glance.

- b. How can the city declare the density in #1 above and then allow this loophole, without any demands placed upon the rental owner? How many other loopholes are scattered within the plan that would also impact the neighborhood negatively?
 - c. Do the rules in #1 and #2 include condominiums?
 - d. Does the property owner have to obtain a permit to build the new unit, in order to make sure that it meets certain standards, especially those within the RRIO ordinance?
 - e. Does the property owner have to revise his RRIO registration paperwork accordingly?
3. In various places, the Pike-Pine Conservation District is mentioned. I thought the city (through HALA and the Mayor's preference) decided there would be no conservation districts. Why the inconsistency? Perhaps the city should reconsider the concept of "Conservation Districts" or at least local design standards, to provide each neighborhood with a sense of identity and stability. This is especially important in the University District, in which our short-term residents come and go, create issues and make demands, only to disappear, leaving the permanent residents and businesses behind to deal with the mess.
 4. In various places, there are regulations listed for neighborhoods other than the University District. Specifically, on page 16, we find the following section: "*West Seattle Junction Hub Urban Village. The following provisions apply to development in the NC3 85 (4.75) zone.*" (page 16) What does that have to do with the U District Up-Zone?
 5. When the new up-zone goes into effect, does it only cover completely new construction or does it also cover any major redevelopment of an existing structure, such as additions, repurposing, upgrades, etc.? Perhaps the city should provide incentives for property owners to redo existing structures in order to increase its density, while keeping the character of a building that reflects the character of the neighborhood (and perhaps this option is already discussed within this proposal).
 6. Is there any discussion of light pollution within the plan?
 7. Is the city taking into the equation the fact that Seattle is squeezed between two bodies of water and that our streets and especially our sidewalks are quite narrow? Without any meaningful setbacks, including balconies, etc., the pedestrians will be confined to walking in a single line along the sidewalks, within the shadows of the adjacent structures; surely this is contradictory to and even incompatible with the creation of socially interactive public space. Furthermore, will the owners of the sidewalk cafes have to provide room for walkers and will they have to pay rent to the city for any public space they use? (Note that cafés should never be considered a major solution to the need for open, green space as they are not multi-purposed, they don't meet the needs of many adults, and they don't include appropriate space for our active children.)

8. Through this up-zone proposal is the city's main goal only to increase density and affordable housing options for diverse populations? OR is the city concerned about creating a neighborhood in which the residents and employees feel safe and secure, in which a true sense of community is promoted, and in which the character of that neighborhood is respected? If so, the city needs to make sure that the design standards are not vague, easily manipulated, and unenforceable. Furthermore, the prose must match the images; for example, if the architect states that his concept parallels, respects, and adds to the local architectural detail, then he needs to justify that comment. Often, when I review the drawings of various projects, I see no proof of the written word. If the architectural compatibility of these design details is NOT obvious to the public, are they simply being used as a ploy to win favors and incentive 'points'? There are many ways that design standards can be used to create a positive impact on a community without creating an undue burden on the developer. Here are a few possibilities:
 - a. Grand entrances that face the street
 - b. The absence of barricades to the street, such as tall walls or fences, cement walls, solid fences which don't let natural light shine through, and tall vegetation, such as bushes.
 - c. The softening of anything that is uninviting to the public, such as massive garage doors and entrance ramps, garbage, etc.
 - d. Lighting options
 - e. Softened landscaping that is not simply cement walls and paths.
9. The city must be truly conscious of the fact that rules and codes have different impacts within different communities. An example is the rule that eight unrelated adults can live in a single unit, which is a major factor in impacts such as garbage, noise, parking, etc. In fact, the parking issue is exacerbated by the city's denial that people own cars and need off-street parking options! Additionally, the city must reinforce a cooperative attitude among its many governmental departments. This includes the following:
 - a. Compatible use of terminology, such as 'units'
 - b. Communication of various issues, such as violations of rental standards, parking regulations, and the maintenance of properties
 - c. Enforcement of codes, especially those that involve health and safety.
10. The City's website has the following bullet point: *"Build an environmentally sustainable neighborhood"*. The city and the builders must include in its environmental impact calculations the energy that will be lost if a structure is torn down, that is, the energy that was already used in its construction and the environmental impact of the material ending up in a landfill. The government must prevent creating a city that is committed to 'planned obsolescence', in which there is a constant and revolving cycle of demolition and reconstruction, simply to increase the tax basis of the city. The city should also demand that any usable material be recycled without the builder being able to claim that this effort would cause a 'financial burden'. Many older homes and other buildings have basic items that homeowners would love to be able to access, such as doorknobs, doors, trim, windows, ornate detail, etc. If recycling these precious items is a financial burden, then perhaps the developer should rethink his entire project. Remember, it is not the job

of the city to help the developer make a profit! And, don't forget that the developer could profit by appearing to be a more responsible neighbor, don't you think? That PR alone would go a long way to obtaining the support of the community surround the new development.

11. **The most important issue I have saved for last!** The statement on the city's website that causes me to cringe is this: *"IMPROVE INTEGRATION BETWEEN UW AND THE U DISTRICT"*! To what end is this being promoted ...to the advancement of the UW and its efforts to expand its influence, impact, and square footage? What about protecting the separate integrity of the University District as a unique neighborhood in and of itself. While the University is obviously an important member of the community, the district should not be viewed as its petri dish for its experimentation and control.

Here is one suggestion regarding the actual ordinance page: Since the document is so large and each section involves so many pages, in an outline format, is it possible to state the section title on the top of each page, so that a person doesn't have to constantly flip back several pages to recall what section he is reading?

Our family appreciates any reflections and insights you may offer. I will do my best to make my formal comments clear and unencumbered by emotions. Our entire University Park neighborhood is grateful for the additional weeks allowed within the comment period. And we thank you for your many years of dedicated service to the City of Seattle and all of its people.

Any legislative up-zoning within the University District should be

(a) integrated with the comprehensive neighborhood plan, entitled "University District Urban Design Framework," published June 20, 2013;

(b) pledge an intent to carry it out as a package program; and

(c) make enactment of the up-zoning contingent upon implementation of major elements of that the comprehensive program. The Growth Management Act, RCW 36. 70A ("GMA") requires no less.

The proposal of the Office of Planning and Community Development, dated May 26, 2016, (Version# 20.5) , Phase 1, is a massive up-zoning of the core area of the University District with more promised in Phase 1. It would build a new University District featuring tall skyscrapers in place of the currently predominantly low-rise buildings. Phase 1 transforms the core area to resemble the skin of a sea urchin with spikes on every block like the UW Tower and the DECA hotel and above a netting of the existing streets and arterials. In 20 years, the core of the U District would look like South Lake Union, but it would lack a boulevard like Westlake, thy UW campus would stand in for Lake Union, and it would be quite as dense. Phase 2 (to come along a year later) would rise to heights between those currently and those of the up-zoned core. If adopted, the people settling in alone will exceed the entire populations of most suburban cities outside King County and some in East King County.

Laws and Policies

The Growth Management Act and the State Environmental Policy Act (RCW 43.21C; "SEPA") should be interpreted and applied together to serve their common purpose.

The GMA requires the City to adopt a comprehensive plan including capital facilities and activities. RCW 36. 70A.040 specifies that the plan must include as elements land use, housing (including government

assisted housing, housing for low income families, capital facilities, utilities, public services, transportation and economic development. RCW 36A. 70.150 requires that the plan identify lands useful for public purposes, such as recreation, schools, and other public uses and RCW 36A. 70.160 adds open space corridors. Zoning and zoning code amendments and local sub-area planning are to comply with the plan.

SEPA contemplates a broad, balanced, integrated approach to decision-making in land use matters. The environmental impact statement process serves as a tool or technique to carry out the policies and goals set out in RCW 43.21C.020. These include in subsection 2(f) achieving a "balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities."

Seattle Municipal Code ("SMC") Chapter 25,05 implements SEPA. It aims to provide useful information to the decision-makers before an agency commits to a course of action. SMC 25.05.055 B 2 states: "A major purpose of the environmental review process is to provide environmental information to governmental decision-makers for consideration prior to making their decision on any action "3. "Appropriate consideration of environmental information shall be completed before an agency commits to a particular course of action."

SMC 25.05.400 A. states that "The primary purpose of an environmental impact statement is to ensure that SEPA's policies are an integral part of the ongoing programs and actions of state and local government."

U District Urban Design Framework

For several years, City officials and departments, University of Washington staff and experts, businesses, and citizens met regularly, with periodic presentations to the public for comment, at cost into six digits to update the University District neighborhood plan that had been adopted fifteen years earlier. Their efforts produced the U District Design Framework ("Framework Study." The Framework Study is available on the internet at [www.seattle.gov/dpd/cs/groups/pan@pan/ ... dpd_o22256pdf](http://www.seattle.gov/dpd/cs/groups/pan@pan/.../dpd_o22256pdf) and at the Seattle Public Library, Central Library, under the call number SEADOC p68.9. It proclaims a vision of a revitalized university district with a high quality of life, a caring community, with diverse populations and levels of income, able to travel about conveniently. The Framework Study comprehends all the elements for a sub-area Growth Management Plan and presents a comprehensive package: it covers up-zoning, and as integral elements, more parks and a public square --- a public square over the Sound Transit station is a pictured alternative; green streets; better METRO transit service; social services for the youth and homeless; affordable housing programs; effective policing to counter drug dealing, car prowling, and other crimes; housing code enforcement against the slum lords; consideration of the needs of and accommodation of special populations; an elementary school and pre-schools to attract families with children; infrastructure improvements; protecting the tree canopy from total lot development; creation of jobs and economic growth; and other elements to secure a high quality of life.

At first, the neighborhood was skeptical. It had gone through a neighborhood planning process for the University District guided by Mayor Paul Shell and had produced a comprehensive package with up-zoning. The City promptly enacted the upzoning recommendations. Two elements of the remainder of the package --- the 'Ave project for widening sidewalks and the acquisition of University Heights Center for the Community --- were already in process when the U District neighborhood plan was adopted and were completed. The remainder of the package (the social services, daylighting of Ravenna Creek, bus service, street improvements etc.) were put aside for later consideration and shelved. Now wiser residents at the first meetings insisted on assurances before participating that this time the City would

genuinely take a "wholistic approach," regard all elements as part of a comprehensive package, and absolutely would not pull out the up-zoning as a severable element. Mayor Mike McGinn, Councilmember Richard Conlin, DPD Director Diane Sugimura, each most emphatically assured the audience that the City was committed to a broad, integrated approach; that GMA concurrency requirements would be followed; and infrastructure for the increased density would be in place or funded before construction of new taller, bigger buildings could take place.

The Framework Study constitutes the "package" presented to the community and the proposal approved. The public presentations told the community that its approach is and would remain comprehensive and the actions would be implemented as a "package." The Framework Study describes all items as integral elements --- not just as possibilities that might be considered as mitigation in the by-and-by. The comprehensiveness and definite commitment to the "package" were --- and are --- essential to its public acceptance, Enacting the up-zone as a separate element dismantles the framework and omits essential elements from the structure of programs and activities.

Parks and Public Square

The Framework Study made acquisition of parks/square an essential element of any up-zoning. The parks element contemplates transfer of development rights; financial assistance through bonuses for paying into a fund, view easements, contract zoning with abutters, and other regulatory techniques. These need to be part of or accompany the up-zoning.

A University District Square atop of the Sound Transit station would invite uses that cater to crowds and events; the alleys gain an amenability to use by people afoot; and the adjoining streets become more pedestrian oriented. Many European cities are built around a central public plaza; smaller town often have a public park right in front of the courthouse acting as a town square. The park/square becomes the community focus. Buildings surrounding the square are taller than those further away. More people want to live there and enjoy the activities; the open space makes the community more tolerant of the height etc. A University District Square atop of the Sound Transit station would invite uses that cater to crowds and events; the alleys gain an amenability to use by people afoot; the adjoining streets become more pedestrian oriented; and the traffic pattern may change. Many European cities are built around a central public plaza; smaller town often have a public park right in front of the courthouse acting as a town square. The park/square becomes the community focus. Buildings surrounding the square are taller than those further away. More people want to live there and enjoy the activities; the open space makes the community more tolerant of the height etc.

Throughout the public process, many participants have said that their attitudes toward the appropriate height for buildings and their location would depend upon the siting of the public square: the plan would be do-able if it had a public square located atop the Sound Transit station or in its immediate vicinity; it would not be if such a square were missing. At street fairs and at the farmers' markets, the public have cast ballots on their preferential use of the site. The overwhelming majority favor a public plaza. Less than 1 % opt for a building there. The proposed up-zoning ordinance impedes establishing a park in the core area: it sets off the core area in phase 1 as commercial/residential; it creates vested rights that greatly increases the property values of the properties rezoned, and it fails to call out in the ordinance techniques that would assist in raising funds for the needed acquisitions, fund. At its most recent open house at the University Heights Center for the Community, the DPD representative said that the law forbids delaying the up-zoning of the site of the U-District Sound Transit station. If the City were to wait until it made a decision on the park issue, the UW might sue the City for damages. What nonsense! The City has great discretion in drawing boundaries of a legislative rezone. There are as good

arguments for confining Phase 1 south of N.E. 45th St. to the area east of Brooklyn Ave. N.E. as for drawing it a half-block easterly as the mayor proposes. Another response is to make a decision on the park/plaza openly, honestly, on the merits now and commit to the plaza location.

SEPA and the GMA expressly require consideration of parks and public spaces in zoning decisions. RCW 36. 70.150 states that cities **shall** identify "lands useful for public purposes" in its comprehensive planning. RCW 35.21 C.11 O(f) classifies "environment" as natural and "built environment" and states "built environment" consists of "public services and utilities such as water, sewer, schools, fire and police protection, transportation ... " RCW 36.76A.030 (13) (quoted at page 3) defines "public services" to include recreation. RCW 36. 70A.070 (3) includes park and recreation facilities as mandatory elements in the capital facilities plan of a municipal comprehensive plan. SMC 25.05.164 and 25.05.444 B 4 d. identify parks as factors for consideration and SMC 25.05.670 (quoted at page 4) names parks as a subject for "reasonable assessment" under the cumulative effects policy. SMC 25.05.675 Section O speaks to parks, in part, as follows:

"1. Policy Background. A single development, though otherwise consistent with zoning regulations, may create excessive demands upon existing public services and facilities. ' Public services and facilities' in this context includes facilities such as sewers, storm drains, solid waste disposal facilities, *parks*, schools, and streets and services such as transit, solid waste collection, public health services, and police and fire protection, provided by either a public agency or private entity.

a. It is the City's policy to minimize or prevent adverse impacts to existing public services and facilities.

b. The decisionmaker may require, as part of the environmental review of a project, a reasonable assessment of the present and planned condition and capacity of public services and facilities to serve the area affected by the proposal.

c. Based upon such analyses, a project which would result in adverse impacts on existing public services and facilities may be conditioned or denied to lessen its demand for services and facilities, or required to improve or add services and/or facilities for the public, whether or not the project meets the criteria of the Overview Policy set forth in SMC Section 25.05.665." (emphasis supplied)

This should apply here to the City as well as to private developers and the decision whether or not to rezone.

The Environmental Impact Statement at p. 3.7-7 acknowledges that University District will fall further behind the City's recommended ratio parks to people. The deficit in parks and open space will grow from about 3 acres now to 5 acres. Proving for a public square now will help alleviate this deficit. In up-zoning the site and in ignoring the public plaza, the proposed ordinance not only violates state law, good urban planning practices, and the City's promises to the community.

Other Impacts

The environmental analysis accompanying the proposed up-zoning is so weak in other respects that the City Council should order supplemental research into the adequacy of the City's infrastructure, of the City services and of the school district, among other subjects, to handle the anticipated impact of a build out stimulated by the up-zoning, e.g.

Sewer and water: The City has set a policy with its utilities that growth should pay for growth. The EIS at p.3.9-8 stated that water and sanitary sewer use is "equally likely" under all alternatives from no action to the maximum build-out That statement implies that current facilities can accommodate all growth through 2035. That assumption is doubtful. Experience in Broadview, Ballard, and other neighborhoods suggest that when taller building replace a street of single story dwellings, new mains are needed. The

sewer lines built before World War II planned for homes, duplexes, small business, and an occasional apartment house. When three and four story structures sprout along the length of a street, the usage soars reflecting the increased population. Unless the lines are replaced with larger ones, the side sewers of the homes at the lower elevations can no longer drain efficiently. In time, new larger mains are built. Seattle Public Utilities has made extensive infrastructure improvements to keep up with the redevelopment of South Lake Union by Vulcan Enterprises. Likely, the taller towers encouraged by the up-zoning will have such an impact. The City Council should call on its utilities to estimate the likely expenditures to meet the anticipated growth. It could then make an informed decision.

Police and social services: The EIS, p. 3 .8-7 and 8 and 3 .11-12, identified no new police facilities or added personnel for the increased population. Pages 3.8-12 anticipated that "the police would have sufficient staffing and facilities" although Page 3.8-8 cautions that "long range plans for police facilities may change." It took a similar wait and see attitude toward social services. However, sociologists find that higher density brings more crowding, and new construction commonly involves displacement of the less fortunate. If social services are not expanded in a commensurate manner, the combination of crowding, displacement, and commonly loss of recreational space, among other factors, brings on greater tension and young men, unable to cope, often turn to gangs or crime. The City Council should be pro-active and defer acting on the upzoning until it has conferred with the police and social service agencies and has in place a program of how to reduce or resolve the problems that may arise.

Schools: DPD in its rezoning reduces the likelihood of developing any new schools in the University District in the same way that it adversely impacts building a park or space. The EIS at page 3.8-13 "significant impacts associated with the proposal are not anticipated" i.e. don't worry or plan for any impacts. Urban planners, real estate professionals, and the community would take issue with this analysis; their experience shows that schools, housing, and zoning interact in setting the demographics of a community. There is sometimes a spiraling effect. Schools attract and retain families with school aged children. Long term residents note that young couple, who intend to send their children to public grade schools, move away when their eldest child is about ready for kindergarten; those, whose children attend Blessed Sacrament, stay. Where there's a market for family housing or local zoning so requires, developers build some units in the mix. If there are no nearby schools, families with young children settle elsewhere and the developers build smaller units. Rural communities tend to atrophy when their grade school closes and children are bussed away to school in another town. Real estate brokers testify that young couples with children in looking for a home ask whether there are other children in the neighborhood; a Yes is positive; a No, is a definite negative to them. Communities without elementary schools lack the richness and diversity that young parents and their children provide.

The best that can be said for DPD's analysis is that its rezoning proposals favor "apodments", studios, and single bedroom units in the new mid-and-high-rise structures and those units don't bring families with children. However, that vision conflicts with the inclusive, diverse, broadly-based, family-friendly community that the neighborhood seeks.

Conclusion

The focus of neighborhood planning should be on the communities needs and desires *as* expressed in its extensive well thought out Framework Study. Instead, the mayor and DPD are proposing a separate, severable, massive up-zone --- an approach completely contrary to city promises and assurances over the years. The City Council needs to hold to the Framework Study and implement in its zoning ordinance. This would show that election of councilmembers by district gave the people living and/or owning property in the "neighborhood" a meaningful role in neighborhood planning.

I have reviewed the U-district master plan and while I understand the intention of the plan to increase the density of the area, I do not see the following considerations addressed:

- 1) Parking – particularly in area I, the assumption of the plan is that parking that currently exists in the area will exist in the future and is adequate for the growth anticipated for the area. We have seen a continual decline in day and permit parking in the area and one should assume that this will continue to decline as alternative uses of the property are enhanced by the plan. Some proportion of new workers will need a place to park – if it doesn't exist, attracting talent to these new business will be hampered.
- 2) Street capacity – during the morning and evening rush hours, NE 45th, 15th Ave NE, Pacific Ave and Roosevelt Ave NE are frequently parking lots (my office looks down on the corner of Roosevelt and 45th and I see it!). I appreciate that light rail may relieve some of the current traffic burdens but a 350% increase in employment will certainly create more traffic for the area. I did not see this traffic situation addressed in the plan or any proposed changes to traffic flows or street capacity (ie prohibition of cyclists on 45th, changes to the left turns onto Roosevelt or the freeway).
- 3) Air flow - I did not see a review of the air flow impacts of higher story buildings in the area. We are not downtown – are streets are not as wide. Thus, high story buildings that are across from one another on 11th or 43rd will have a different air flow impact. We already have a dramatic air effect going on at the corner of Brooklyn Ave NE and NE 45th, where air comes up the hill and comes between the two highest story structures in the neighborhood (UW Tower and the Decca Hotel). On a breezy day, it can be like walking in a wind tunnel.

The zoning, in and of itself, will not produce a desirable area for commercial development – the items above would need to be addressed as well.

I bought a house in the U. District in 1998. I was drawn to this neighborhood because it is lively and diverse. It is one of the few neighborhoods in central Seattle with economic, racial, age, and gender diversity. Over the past 18 years, I have seen my block go from 70% owner-occupied to less than 30%. I have seen traffic congestion increase markedly. I have seen a neighborhood I have loved go to one I am frenemies with.

I oppose the up-zone. I request you consider a site-specific re-zone, not a Master Plan, so as to control the increase in property values. Open space and parks will be impossible under the proposed Master Plan. The Master Plan obliterates the unique character of my neighborhood. We need open spaces, parks, and green space. It is disturbing that 11th Ave. NE has, in a few years, gone from a funky street with single-family homes, trees, and a few appropriate commercial businesses, to a street in which light barely filters down, a concrete jungle of condos and apartment high-rises.

Many forces take from the U. District. UW takes. The City takes. You take because the residents of this neighborhood give. We give you our liveliness, our funky diversity, and what we get in return is the concretization of our once-lovely neighborhood. We want our historic buildings left intact. We want our rents and homes to be affordable. We don't want thousands of tiny units which will increase our

already disastrous traffic woes. We want safe streets with trees and light and green space. The upzone rapes our neighborhood.

I support Livable U District's position statement. I support developer impact fees. I don't want the U. District to become yet another faceless, concrete neighborhood it is impossible to traverse. I want an elementary school and a middle school so children are welcome.

I abhor what the upzone does to my neighborhood, even though I know my property value will increase. I don't want 45th to become a canyon through high-rises. I want the true needs of this unique neighborhood to be dictated by the residents, not a misguided city administration.

I am a small-business owner, with an office located on the western edge of the U-district. I am excited about the prospect of re-zoning the neighborhood for greater density and taller buildings, something that I think will draw others from my industry to the area. That said, I am also wary of any plan that does not solidly endorse the presence of open public space, appropriate for gatherings like the weekly farmer's market. I wholeheartedly recommend that a location be reserved for such a public space, and plans for funding and development of a central square move forward in conjunction with the plans for re-zoning the neighborhood.

Choose Public Space!

Choose Public Space!

I support the position of the City of Seattle/University of Washington Community Advisory Committee, that the proposed rezone of the University District should not move forward until a site has been identified for the creation of a central public square in the University District near the new light rail station.

For what it's worth, I live in the Montlake neighborhood and I make frequent trips to the University District for errands and recreation. It's a wonderful, walkable neighborhood with good service by public transportation. By way of contrast, I consider University Village to be a car-dominated abomination and I never go there.

Choose Public Space! As homeowners in the University District, my husband and I oppose the new higher limits, particularly with deficit of open public space! Please count us in as opposed!

I Choose Public Space! I definitely think there should be a public space/park in the U District.

I also think that a 320 foot height allowance for buildings is too tall. Fifteen to twenty stories would make for a much more human scaled environment. Not quite Paris, but not Manhattan either.

Choose Public Space!

First I am an avid supporter of rail transit.

Second, high rise, high-density buildings don't bother me.

BUT... There has to be a public square in the middle of the U District and It should open onto the Ave. Why not fulfill the promise of the earliest designs and incorporate the light rail station in such a square?

What we build now must serve the neighborhood for many years to come. Please incorporate some open space in the middle of the U District.

I wanted to voice my support for the up zones in the U District, which are a necessary tool to increase affordability. I also wanted to mention that, although the public square that U District Square is advocating for sounds good in theory, I think it will benefit the community more to increase density around the light rail. Public spaces are important, but a large public square isn't very dense, so I don't think it's a good use of that particular space.

A public space in the form of a central square (in the heart of the U District, near the pending light rail station) is essential to keeping the U District civilized, user-friendly, cosmopolitan, and alive in the democratic spirit of a major university.

Without it, the U District will be merely a lackluster dormitory. Seattle is more than a collection of buildings, and a public gathering space is an expression of its vibrant strength and character.

No up-zone legislation until a central public square in the U District is created.

I feel that the public space that has been offered to the U District should be a great beginning to the open Space project.

The three areas: Festival streets on 43rd, Brooklyn and a possible park site adjacent to the Light Rail Station should be sufficient to create an open festival space for the U District near the light rail station.

Choose Public Space for the University District. The University District needs Public Space. With the high densities that are being proposed if the public space is not set aside it will be impossible to get. It will be impossible because the economy of taking a large building for a park isn't there.

The City is giving developers free reign to take over what where public amenities. Sidewalks are crunched, public art is no longer encouraged, access for freight or emergency vehicles is non-existent. Streets have to be closed so that deliveries or moves can occur.

Please be mindful of the value of these things you are giving away and try to negotiate a better deal for all residents of the city.

Choose Public Space!

Although the rezone proposal is mostly acceptable, it really must contain a dedicated/planned Public Square. The character of the U District is too important to just place our "hope" that public space will occur. Surely this could be included now in the draft proposal as a guarantee.

Choose Public Space! To whom it may concern. It seems like a nice idea to us the old post office building on the Ave for public space since it is in desperate need of repair. Also we could use a lot that has trees on it already and buy that and turn it into a garden or public park. There are still a few lots around

Choose Public Space! To whom it may concern. What about the lot on the corner of Brooklyn and 50th.??

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

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

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

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

- The principles of the U District Urban Design Framework were not closely followed. The upzone proposal actually dismantles the Framework by separating out and ignoring the concurrent adoption of measures to address many of its integral elements.

- Among other things, the 2013 Urban Design Framework contemplated that an upzone would not be considered in isolation; rather it would be part of an integrated package conforming to GMA concurrency requirements.
- This package would include provisions for increased open space, parks, and a large public square - preferably above the new light-rail transit station. The package would also include provisions for enhanced social services, comprehensive transportation and public works infrastructure, public schools and facilities, and other essential elements contributing to livability and the capacity for sustainable growth.
- The City Council should not treat this upzone proposal as severable from the rest of the elements of the U District Urban Design Framework. It must delay consideration of upzones until integral elements of that program are concurrently adopted or funded.

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

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

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

- For the extreme upzones North of NE 45th, we cannot help but wonder if it is solely to satisfy upzoning auto-dealership land-owners and the landowner of a parking lot at 9th Ave. & NE 45th that OPCD would resort to exaggerating and mischaracterizing the number and whereabouts of existing U District "tall buildings"?
- Likewise, for the extreme upzones south of NE 45th: Is OPCD's motivation to expand and mischaracterize the location of existing tall buildings influenced by the UW's plan (outside the scope of this upzone proposal) to construct numerous new high-rise buildings on its West

Campus as part of its next Campus Master Plan? Is it to create a high-rise backdrop where the sweeping height increases likely to be proposed by the UW can now be said to be “consistent” with the surrounding neighborhood?

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

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

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

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

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

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

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

4) The UDCC remains gravely concerned that OPCD has failed utterly to provide a real analysis that quantifies accurately the number of existing low-cost market rate apartment housing units that this proposal will displace, and supports City Councilmember Lisa Herbold’s call for a thorough displacement analysis to take place before such significant upzones are undertaken, and that there MUST be 1-for-1 replacement of any such units lost to the redevelopment that appears to be OPCD’s overarching goal for our neighborhood. We are particularly concerned about the rezone of much of the southwest U-District from lowrise to Midrise, which will surely increase the level of redevelopment and displacement

that will occur (and which likely wouldn't absent this upzone) in a quadrant of our neighborhood that contains so many affordable apartments.

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

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

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

I am in favor of a higher density U District Square. That will limit higher densities from spilling over uncontrolled in residential neighborhoods. Along with a higher density designated area, comes increase traffic and noise and possible loss of public green space. I don't think the Light Rail Tunnel Station and facility will be enough to handle the increase traffic. Parking need will increase and will spill over to residential neighborhoods, even if only limited parking for 2 hrs and the requirement of zone parking permits for residents. Homeless and panhandling issues are rampant in the U District. So, I would like to see a proposal that will include proposals to alleviate loss of green space, or creating more green space, to alleviate increase traffic, handle increase parking demand and to alleviate the homeless problem(not just say there are new shelters being built near the University library on NE 50th and Roosevelt).

OVERVIEW

The University District in Seattle is at an unique nexus of a world class University, a vibrant business district, a hub of multi-modal transportation options and is also a place where an ever increasingly number of Seattleites choose to work, play and make their home.

I greatly appreciate all the hard work that the City and its OPCD staff (especially Dave LaClergue, Susan McClain, Janet Schull and Dennis Meier) have done towards examining the area's zoning changes that will benefit not only the University District, but the entire City of Seattle.

However, I feel that the City's proposed changes are incomplete. The draft zoning can and should be revised so to better serve the future of our University District neighborhood.

CONCERNS

1. **University Way (Ave) Zoning:** Building height limits have been incorrectly and inconsistently implemented within our neighborhood and proposes to leave fallow the “main street” and heart of our Community (“The Ave”). These lower height limits have been asserted under the guise of historic preservation and maintenance of the area’s character. What is effectively no change to the current zoning heights along the Ave will not be effective at accomplishing those goals as the economic case already exists for these properties to become 6 story buildings as allowed currently. Once the final zoning is codified, such development will take place. Mandating additional 65’-85’ (Type V) buildings versus the 240’ and 320’ proposed everywhere else south of 45th Avenue has several significant disadvantages;
 - A. Will **NOT** result in any historic preservation, nor maintenance of the Ave’s character and will contrarily result in the expeditious construction of Type V / 6-story buildings that will create monotonous architectural tone (ala Belltown / Ballard) on our community’s “front door” and main street “The Ave”. However without the benefit of the wider streets that the Ballard and Belltown neighborhoods have, the effect will be even more dramatic and contrary to the City’s advertised maintenance of the current “look/feel” of the Ave.
 - B. Leaves fallow a significant amount of our City’s ever increasingly rare, ideally situated potential development capacity for future housing, office and retail development potentially for decades.
 - C. Lessens potential for public open space opportunities with taller towers with a reduced base footprint.
 - D. Lessens potential future tax revenue for the City, County and State of Washington.
 - E. Significantly reduces potential future HALA projects on the Ave (one of the Mayor’s key projects).
 - F. Removes opportunity to preserve historic structures through Transfer of Development Rights (TDR). If base zoning height is increased, an increased potential exists to transfer that increased potential then to another parcel. This greatly improves the economics to preserve the character and feel of the Ave.

2. **New affordable housing MHA development fees are being inconsistently implemented.** Properties that are not being significantly up-zoned are still required to pay the newly proposed development charges and therefore are adversely affecting Ave property’s value without a corresponding proposed benefit. If the zoning of “Ave” properties remains “as is”, all proposed MHA development fees should be waived for all affected “Ave” properties.

PROPOSED SOLUTIONS / ALTERNATIVES

- 1) **Increase Proposed University Way Building Heights:**

- a) University Way NE South of 45th Ave NE - Increase the building height to 240' (the same as the proposed heights along 15th Ave NE). This would allow greater diversity in building design, increases the possibility of thinner buildings with ground level open spaces.
- b) University Way NE North of 45th Ave NE -The proposed NC3-65 height change North of 45th Ave NE should be extended to 85'. The steeper terrain of the north Ave would allow for designs with additional floor to ceiling height flexibility for taller loft units and also creates possibility for economical above ground parking designs.

2) **Design Guidelines / Façade Articulation:** Design guidelines should be established and they should encourage articulated building facades, inviting pedestrian scale retail spaces, and other design elements that would encourage building design diversity in both form and function.

3) **Historic Preservation:** Historic and architecturally notable buildings should be evaluated for importance to neighborhood fabric and plans put in place to help ensure that significant structures be preserved and/or modified to maintain key architectural elements important to the neighborhood.

Not sure if zoning issue, but strongly recommend we in NE seattle and all Univ people get a plaza above ST Brookltn station instead of high rise. We need to preserve some open space, it's fast disappearing in U district. !!

I'm writing to voice my strong support for the U-District Rezone Plan. As a graduate student at UW, I've struggled to find housing within my budget near the university, and the only long-term solution is to allow more housing to be built by zoning for taller, denser construction around UW. More housing in the U-District allows more residents to live in walking distance of the state's 2nd biggest job center, and gives more people access to a fast, environmentally friendly commute downtown via Link.

If I had my way, the upzoning would be more drastic (open space requirements near a light rail station are like chopping down a forest to save a tree), but I understand that compromises must be made in reflection of political realities, so I strongly support this plan. Thank you for your consideration.

One of the "Guiding Principles" of the upzone plan is to "Build an environmentally sustainable neighborhood" (Director's report dated May 27, 2016, page 10). It notes a "focus on walkability, efficient buildings, and green infrastructure." I believe that the plan does nothing to support this goal, and in fact, is promoting the opposite.

The City of Seattle has committed to achieving carbon neutrality by the year 2050 (see Seattle Climate Action Plan, adopted as Resolution 31447.) To meet this goal, the City will need to greatly reduce energy use in both the building and industrial sectors, transition transportation modes to mass transit, and fully

electrify those means of transit using electricity resources gained by reducing building energy use. Moreover, deploying renewable resources within the city also needs to be a part of this vision. To my mind, the City hasn't done enough to move in this direction, although there are certainly excellent built examples for transportation - link light rail - and buildings, including the Bullitt Center and other near net zero or net zero ready buildings like Federal Center South and the Stone 34 building in Fremont/Wallingford.

This plan does nothing to move the city in this direction and in fact moves the city away from it. By enabling taller buildings, it significantly decreases sustainability for the following reasons.

- Taller buildings are inherently less efficient than shorter buildings. Data presented in the City's Building Energy Benchmarking Report (September 2015 for 2013 data) shows that average Multifamily buildings 10 stories in height or more actually use almost 60% more energy per unit of floor area than 4 to 5 story buildings. Data derived from the EPA's Target Finder for office buildings in Seattle shows a similar pattern for large vs. medium sized office buildings. For example, office buildings 200,000 square feet and over consume 20 to 40% more energy per unit of floor area than buildings in the 20,000 to 50,000 square foot range.
- Low- to mid-rise buildings can be constructed to achieve net zero energy through deployment of rooftop renewable energy systems, whereas tall buildings have very limited opportunities to supply much of their energy from renewables due to increased demands and lack of available roof area. The Bullitt Center on Capitol Hill is an internationally recognized model for net zero energy. At six stories tall, and with a hyper-efficient design, it is a perfect blend of efficiency and renewable energy but also shows that in Seattle, six stories is pushing the envelope at which a building can be net zero.
- Tall buildings further degrade sustainability by casting shadows on adjacent buildings. This decreases the potential for neighboring buildings to effectively deploy renewable energy – the systems get shaded and therefore are not as effective. The shadowing also reduces available daylight to surrounding buildings which then requires more electricity use in those buildings for lighting.
- As a final comment, I would also say that tall buildings are less healthy than low- to mid-rise buildings. People can walk up 6 stories, but that is about the limit for most. Taller buildings require use of elevators, which increases energy use and decreases opportunity for active use of the building. Low- to mid-rise buildings can also use passive systems for ventilation and cooling better than taller buildings – again, giving people a better connection to the environment while keeping energy use down.

I understand that sustainability is increased by locating buildings and services near transit hubs and that this is central to the plan. But the plan does nowhere near enough to consider the entire picture of sustainability, which includes the issues I have raised here.

As a Seattle resident and a parishioner at Christ Church Episcopal on Brooklyn Avenue, I wanted to let you know that I strongly favor the OPCD's rezone recommendations. It is sensitive to livability concerns but also looks ahead with foresight to a growing and diverse city. I am very excited at the possibility that

my church will be part of an expanded neighborhood that allows greater opportunities for density and affordability.

Good morning and thank you for slogging through what I hope are many public opinions! I currently live on Ravenna Blvd and lived on 15th NE for 3 years. I support the upzone in the area, especially with the expansion of the light rail. I think the city should generally increase density near these major transit hubs. This upzone would bring many new residents to the neighborhood and all would benefit from some additional open space. Currently, the only welcoming green spaces are the university heights community center, UW campus, and Cowen Park. Campus is obviously mainly for the UW students and not a practical place to relax for other area residents. The other 2 locations are quite far north in the neighborhood. As we upzone, please keep in mind the need for green space, not simply asphalt-covered parklets.

Go as tall as you can go. We need more housing in every corner of the city, but we also need to leverage out light rail investments as much as possible.

I'm writing to express general support for the University District zoning changes. Increasing density around both a regional light rail station and one of the nation's premier universities will reap enormous benefits in reduced carbon emissions, greater access to opportunity, and greater efficiency of public infrastructure. In fact, we should be implementing similarly ambitious upzones around all of Seattle's light rail stations, including Capitol Hill, Roosevelt, and Northgate, to create more compact and walkable communities.

However, my one reservation with the upzone proposal is the lack of assured open space concurrency. The University District currently has a five acre deficit of open space that will only increase with future population growth. I appreciate the proposed incentives in the rezone proposal, offered to property owners and developers that might result in the creation of a central town square, but by themselves, they are insufficient as a guarantee.

As part of the rezone proposal, land for a community plaza near the light rail station must be planned for and eventually acquired. The high amount of commercial activity and foot traffic in the vicinity of 43rd and 45th Streets make that area ideal for the neighborhood's new open space. If not on top of the station box itself, the site of the Post Office would be an ideal location.

Our University Park Community Club members have been following the discussions around the UDistrict Urban Design proposal with great interest. We are not directly located within the planning area, but

urban design decisions will affect the quality of life in all U-District neighborhoods, including University Park.

The Draft Recommendations dated May 27, 2016 list four major planning goals: Zoning Changes, Development Standards, Affordable Housing Requirements and Amenities. Unfortunately the emphasis of the proposal is on zoning changes, softened by new development standards. This falls far short of the comprehensive planning effort we expect. We therefore cannot support this proposal unless other issues are adequately addressed.

We and other groups and individuals have repeatedly pointed out the shortcomings of the present plan, as previously presented in the U-District Urban Design EIS, but so far most of our comments have been ignored. A truly Comprehensive Plan would take into consideration increased and expanded amenities, which are needed as growth occurs. These amenities are part of the necessary infrastructure and must be incorporated in the plans, including appropriate funding mechanisms. It has finally been impressed on the planners that affordable housing is one of these amenities, but this was addressed only after the Mayor convened the HALA Advisory Committee in late 2014 in response to Seattle's housing crisis, and the HALA Committee issued its recommendations in 2015. The inclusion of the "Grand Bargain" for affordable housing is now used as an example of how important growth issues are being addressed as part of upzones, but it camouflages the fact that other amenities have fallen by the wayside, and at best, are mentioned as possibilities in the UDistrict Urban Design proposal. We need a REAL BARGAIN to also address and fund other infrastructure needs through impact fees.

The fact that Mandatory Housing Affordability (MHA) requirements have been added to the original plan shows, that if there is political will, it is possible to go beyond just an upzone and take a broader view of urban design. This concept should be expanded, but it requires leadership and better collaboration between City Departments and other agencies, which still operate too much in their own silos.

Issues that should have been addressed include the following:

1. A comprehensive mobility plan for the U-District. This must include good pedestrian and bicycle connectivity between Light Rail, buses, neighborhoods and the University of Washington. It also must address freight mobility, private car circulation and parking, including disability parking. Only fragments of such a plan exist.
2. Public Open Space near the core of the U-District. This has repeatedly come up as a high priority for the neighborhood and would address the documented open space deficiency. The potential funding for this amenity comes from incentive zoning fees, but these are inadequate, and the present plan all but assures that this vision will never come true.
3. Public Schools and Family Housing. The lack of public schools is well known, but there is no path forward to improve this situation. There is talk about encouraging the construction of larger units for families, however, in the end it is up to the developers to decide, and unfortunately, direct experience shows that studios and single bedroom units are financially more attractive. Of course without appropriate living space for families, we do not need any schools.
4. Housing Affordability. The MHA legislation is a step in the right direction, but it is insufficient and too generous to developers. One-to-one replacement of existing affordable units must become mandatory.
5. Social Services and Health Care. We have another crisis here, and homelessness and substance abuse are getting worse. Funding for the growing need for care facilities and programs, and their operation is not addressed in the upzone proposal, but should be.
6. Other services such as police and public utilities must also keep pace with the population increase. An upzone must include funding to expand the necessary infrastructure. It should be noted that all these issues were addressed as part of the Guiding Principles developed for the U-District Urban Design

Framework in 2013. An upzone must fit into this framework and provide funding resources to achieve the desired goals. There must also be ongoing monitoring and control to assure that the framework goals are indeed met.

The present uncontrolled growth of Seattle must be replaced by a focused and channeled approach, where a major portion of the increased property value flows back to the public in the form of improved amenities. Despite being mentioned as a major plan component, support for these amenities is mostly missing in the U-District Urban Design proposal.

Conspicuously absent in the planning is the fact, that as part of its 2018 Master Plan, by 2034 the University of Washington expects to increase its campus population by around 20,000, and add 6 million square feet of new construction, half of which in the West Campus area. This will add more pressure on the U-District infrastructure, in addition to the population and job increases projected in the EIS.

In summary, the U-District Urban Design Proposal is incomplete and if this legislation proceeds as presently proposed, known existing problems will be exacerbated. It must be modified to include the missing parts mentioned in our letter.

I have grown up in the U District. I went to Roosevelt High School and subsequently the University of Washington. I love my home, and my neighborhood. Given these facts and the growing demand for space in the City I grew up in I would like to voice my position as in favor of the Rezone proposed by OPCD.

The increased density meets so many of the goals that the community has established over the decades of neighborhood planning that have taken place in preparation for this moment.

Its time to let the City grow up and I believe the U District is ready to rise to the occasion.

I would like to thank all of the OPCD Staff and all those that have worked so hard for us to reach this proposal now.

Lets do this thing.

As the current Vice President and former President of the neighborhood Roosevelt Neighbors Alliance, as well as a long term resident and home owner in the U District, I wanted to express my support for the rezone as currently proposed in the rezone map on the U District Urban Design page.

I believe that adding density will result in redevelopment attracting more non-UW jobs to the U District and helping to revitalize the traditional retail core of the U District. Added residential capacity directed towards non-college students, and specifically to young professionals and families, will provide a greater level of "eyes of the streets" to help decrease the rampant crime.

As a member of Generation X who has lived in Seattle my whole life, I believe that we have a moral duty to add density within urban centers near mass transit to combat climate change and protect forest and wetlands from development. It also creates more walkable neighborhoods for more people, which

promotes general public health.

It is also readily apparent that we are fast approaching a housing crisis brought on by simple lack of supply. We have not been able to add housing as quickly as the jobs are created in Seattle over the last 7 years. Limiting supply will continue to escalate housing costs and accelerate the loss of racial, economic, and familial diversity within the city as those with higher incomes escalate the costs of housing that currently qualifies as affordable.

We have been engaged with this process since it started with the Livability Partnership. The position of the Roosevelt Neighbors Alliance, which is encompassed in the study area, was the added density and capacity should be focused on greater heights close to the light rail station and protecting single family areas and those with single family characteristics.

As part of this process, the RNA hosted 1-2 outreach meetings annually to the general population for several years in a row. The meetings were publicized with flyers delivered to the door steps of all the residents within the RNA. Included in this outreach was an effort to remove a number of blocks from the Urban Center boundary, and a slight increase to include the west half of Blessed Sacrament Church (to facilitate site improvements for ADA access).

The position of the RNA board is that we support the upzones, support the increased density close to the station, and support protecting the single family zoned areas.

I personally support even greater heights in the blocks close to the station and including all commercial buildings in the taller height limits. The U District already has a number of high rise buildings and the proposal would only allow residential buildings close to the height of the University Plaza and the UW Tower (former Safeco building).

I would urge the council to either pass the existing proposal or increase the heights proposed in the areas shown with a height limit of 240' or 320'.

The Laurelhurst Community Club has reviewed the Office of Planning and Community Development draft zoning recommendations. While greater height and density may be desirable to accommodate growth patterns near light rail stations in urban Seattle areas, the scale of development put forth in the University District

(U District) proposals appears disproportional when compared to the potential benefits to affordable housing, job growth, and neighborhood enhancement.

1. The Director's Report Appendix C, page 6 captures the rezone criteria. The target established must be no less than 125% of the Comprehensive Plan for the urban center. (SMC 23.34.008.A.1) The matching analysis states that the proposed plan for 17,000 additional jobs is 350% of the 4,800 estimated jobs for 2035. In addition, the Director's Report states that this rezone yields 9,500 new housing units or 190% of the estimated need of 5,000 new units by 2035. The existing Comprehensive Plan for 2024 states 2,450

new housing units needed. Thus, the alternatives should be reduced to reflect a more realistic, data driven plan.

In June 2012, the Seattle Displacement Coalition also reported the University District was already at 94 percent of its 2024 growth target.

Analyzing the data and using the growth management plans are more reasonable approaches to rezoning. More moderation would provide office and housing units that can be absorbed without over building, which could create building vacancies and cause unnecessary moving disruptions to existing residents and local businesses. Up zones should create public benefits for existing neighborhoods and not be granted simply for the financial gains of developers.

In the regional Growth Management Act, city planners assigned an additional 3,900 housing units to the U District through 2035. According to the Seattle Displacement Coalition, the current U District zoning capacity can accommodate about 7,000 new units and ample office space for job growth. Given these facts, the proposed height and density up zoning of the U District is completely out of scale, if necessary at all.

2. LCC has reviewed The Director's Report, and Appendix C states "development shall not exceed the service capabilities which can reasonably be anticipated in the area, including street capacity, parking capacity and sewer. (SMC 23.34.008.F.4.2) Infrastructure support of the massive proposed growth is not planned to keep pace with the impacts from these proposed alternatives. The only real new amenity is light rail service. However, more connective transit options, adequate sidewalks, usable roads with all lanes in good repair, numbers of police officers on streets, overflow sewer systems, and the lack of "non-portables" space in city schools have not been adequately planned. Just adding dwelling units or office space is not enough. The city's residents, especially taxpayers who have the second-highest tax rate in the country, are fed up with traffic, congestion, and unbridled development at the expense of Seattle's livability and connection to its natural beauty.

Large impacts from developments are seldom paid for by the developers – for example, better transportation, off-street parking, schools, or police and fire support. Up zones create private wealth, not a public wealth of amenities. The re-zoning alternatives need to include space and fees allocated for the city's services and schools before any plan is acceptable.

3. Displacement issues. The alternatives proposed, if built out, would forever change the historic character of the U District, known for its eclectic mix of students, immigrants, affordable housing, economic diversity, restaurants, and small businesses. Some residents in this diverse neighborhood would be especially vulnerable through the proposed rezone, particularly low-income community members and seniors. These alternatives show many of the lower- to mid-rise housing units completely wiped out and replaced with new, significantly taller buildings with higher rents. In the meantime, where will people go, even if they want to return to the street where they now live? They will all have to move out. Up zoning low-rise areas to mid-rise will open up development by eliminating existing, smaller, affordable housing.

The proposed radical up zone of the U District would not meaningfully address the neighborhood's youth homelessness, homelessness in general, or drug usage. Each developer works independently, without cooperation and coordination with others, providing little, or no contribution to the real

displacement issues. A few extra units of supposedly "lower income" dwellings through up zoning will not prove as affordable as leaving the zoning as is. Large impacts from developments are seldom paid for by the developers: better transportation, off-street parking, schools, or police and fire support, for example. Up zones create private wealth, not public wealth.

The 2002 report on the U. District's historic buildings makes recommendations for preservation of the built environment, including the apartment buildings and churches built in the 1920s. Preserving some of the old structures and character of the neighborhood is vital to preserving the essence of the U District community. While the up zone plans provide incentives to developers to preserve structures, what guarantees are in place to ensure protection?

4. The Director's Rule, Appendix C states in its criteria (page 8) that "the impact of more intensive zones on less intensive zones shall be minimized by the use of transitions or buffers, if possible. A gradual transition between zoning categories, including height limits is preferred. In addition, the Director's Rule further states (SMC 23.24.009.D2, page 12) "A gradual transition in height and scale of activity between zones shall be provided unless major physical buffers are present".

What the proposed plan offers instead is drastic increases in building heights from existing single-family, low- and mid-rise multifamily, and commercial structures (maximum 65/85') to four to eight times their current heights from MR 85 feet height to 240' or even to 340' high. This does not comply with the City's own criteria for the re-zoning codes at all. What the alternatives offer instead are large walls of tall buildings with heights of 240' to 320' right next to zoned MD 85. The lower zoned buildings are shadowed out by the larger, creating tunnels of structures and tall backdrops to lower and mid-rise buildings. The planned up zones, if any are needed, should be more gradual, with parcels retaining LR along the southwest corner, and gradually increasing to MR 85, then to a maximum of 160', the height of Hotel Deca. (SMC 23.34.008.R.1)

5. Director's Report (page 11) criteria states, "Height limits shall reinforce the natural topography of the area and its surroundings, and the likelihood of view blockage shall be considered. " (SMC 23.34.009B) The proposed 320' heights – 30-story towers – in Alternative 2/2B are too high, and out of human scale. The 22-story UW Plaza tower (formerly Safeco Tower built in 1975) is 325' and is the tallest building outside of downtown Seattle, with an aggressive zoning variance, not the norm. New towers would rise 15' higher than this lone, out-of-scale, structure. Thus, the topography of the proposed up zone area slopes from a 150' high point (plus 320' building heights) down to sea level, making the top of the structures approximately 500' above sea level. High rises of 320' are much higher proportionately than the surrounding communities at sea level, increasing their visibility even more across the city, and negatively impacting view corridors. While up zone plans call for set backs, tower separation, individual unit entries, mid-block pedestrian access and more, what assurances are in place to guarantee compliance over a period of many years, changing city administrations, and continued pressure from a growing population?

The bulk, height, and scale of both proposed zoning changes will block natural mountain view corridors both within the U District itself, and also from surrounding signature Seattle hills and neighborhoods. This is expressly discouraged by the Seattle Municipal Code cited above. Among those negatively impacted are Fremont, Wallingford, Queen Anne, Montlake, Laurelhurst, View Ridge, Ravenna, and the Eastside communities of Medina, Kirkland, and Bellevue. The Olympic Mountains and Cascade Range, Mt. Rainier particularly, provide Seattle's stunning sunsets, and sunrises. To obliterate from view such

unique natural beauty is to deprive human beings at their core. Replacing view lines with spikes of unneeded high-rise towers is unjustified and, more importantly, unnecessary.

6. The alternatives offered in the U District up zone offer no guarantee of the much needed, and promised, public open space or park, or community plaza. With the plans for the Light Rail at Brooklyn Avenue NE, the local community's request for an open plaza was hijacked. Nothing is guaranteed in these alternatives to give relief for residents and users to enjoy open or green space. A few private rooftop gardens will not be adequate to provide needed relief from the dense build out of additional structures in this neighborhood. It is imperative that the alternatives provide a planned and paid for public open or green space, funded by a development impact fee or from the Seattle Parks District levy. If it is not embedded in the alternatives, it will never be donated in any way by private developers.

Laurelhurst Community Club suggests alternatives for better accommodating the planned growth in 2035, while retaining the vibrancy of the University District, including the following:

1. Reduce the overall development to a sustainable level that the infrastructure can accommodate. The plans should offer 150% of the recommended targets for the Seattle Comprehensive plan, not 350%. Zoning should not be allowed for heights of 320' or 240' and should be capped at 160' feet maximum. Alternative 1 offers more human-scale heights, with more gradual stepping down of zones permitted.
2. Rework the transitions from the lower zoning to a more gradual plan for adding height. For example, the "Ave.," at 40' to 65', should NOT be surrounded by 240'-320' buildings as proposed in Alternative 2. The University of Washington office building on Brooklyn Avenue NE should be treated as a zoning variance and not "the norm" for determining more gradual zoning from 65' to a maximum of 160', the height of Hotel Deca.
3. The topography of these alternative plans is missing. Heights are too high as they are planned and not in scale considering the elevated altitudes. Neither do they reflect the natural rises and slopes, which can better accommodate various heights. In addition, view corridors from surrounding neighborhoods should be analyzed for potential blockages of the Olympic Mountains, Mt. Rainier or the Cascade Range and indicated in a supplementary EIS. These views of exquisite natural surroundings should be as protected as the University of Washington protects its "Rainier Vista" view corridor.
4. Open/green space for the public must be embedded in any of these alternatives. If it is not required by the City of Seattle, it will not occur. Funding can be sourced through development impact fees or the City's Park District taxes.

While much time and effort has been put into these proposals for the University District's zoning changes, additional options must be considered. A more moderate approach would help retain the livability of the U District, adhere to the Seattle Municipal Codes, and provide more than enough capacity for projected future growth.

The City University Citizens Advisory Committee (CUCAC) appreciates the opportunity to review the University District Rezone proposal. CUCAC is made up of residents and neighbors of the University District who care deeply about the University and surrounding neighborhoods.

CUCAC's opinion is that the U District Rezone Proposal sorely lacks adequate public benefit in return for the increase in development potential. Two extensive community input processes leading up to the creation of the 2005 University District Parks Plan and the Open Space Forum of 2014, identified the creation of a central public square as the neighborhood's top open space priority.

The neighborhood is home to one of the best year round farmer's markets in the City. The farmer's market, together with the street fairs and other public activities, provide as much or more public benefit than any of the other measures outlined in the plan, however, the neighborhood is forced to close streets to hold them due to a lack of adequate space. These neighborhood elements are vital to the interests of the community and deserve a permanent venue to ensure their continuance.

We, as residents and neighbors of the University District, believe that this plan should not go forward until a mechanism is identified to create and maintain a central publicspace on or adjacent to the future University District light rail station comparable in size to the Sound Transit site (approx. 30,000 sq. ft.) The livability and vitality of the University District requires open space, open and available to the public. If political will cannot be found now, even as an upzone may bestow enhanced property rights worth \$10's of millions to private land holders, when should the community EVER expect to see its public realm improved through the funding and realization of its highest public space priority?

Introduction

The Livable U District Coalition Opposes Adoption of Upzones in the University District. Livable U District (LUO) is a true grassroots ad hoc coalition of University District renters, homeowners, small businesses, organizations and their supporters committed to preserving both the livability and affordability of Seattle's University District. Dozens of individuals and organizations have thus far endorsed LU D's position statement found at livableudistrict.com.

Serious livability problems exist in the U District right now that will be increased by implementation of OPCD's draft zoning proposal. These include unmanageable traffic congestion, a lack of open space, loss of tree canopy, loss of existing affordable housing and historic buildings, public safety issues, insufficient parking for residents and businesses, and a growing homeless population lacking services and shelter.

The upzone plan is keyed more toward attracting visitors, day-trippers, and short timers than in attracting and retaining long term residents who want and need, for example, more parks, open spaces, and a central public square. Upzones and the rising property values they create will place the purchase of sizable public open spaces increasingly out of reach-especially when developers can escape paying impact fees to help pay for them. An open space strategy for the U District should not depend upon random patches of painted concrete, and privately owned walkways to make up for severe deficits in green and natural open space amenities.

Massive upzoning in the University District before putting in place necessary infrastructure and livability measures will merely layer greater density over existing problems, making them harder to solve. OPCD's proposal to drastically increase allowable heights in the U District lacks credible justification. The Council should reject the upzone proposal and the flawed "Director's Report" that attempts to justify it, and tackle First Things First.

The OPCD's "Director's Report" that accompanies the proposed upzone ordinance is dishonest and misleading, and is a disservice to the council.

It fails to honestly discuss the degree of community opposition to the U District upzone proposal, and "protests too much" about OPCD's alleged community engagement, acceptance and incorporation of community input. Sadly, it is clear that OPCD had a plan and agenda that it was trying to sell to the public; and the "outreach" staff conducted more resembled marketing events than an honest effort to incorporate meaningful concerns raised by individual community members and representative community groups. Livable U District is not alone in this view, as comments from the University District Community Council and other community groups will also attest.

People familiar with the concept of "resume padding" will recognize the similarities to the various references to community outreach and input contained in the Director's Report. For example, the May 16, 2016 forum¹ co-sponsored by Livable U District and others is cited as an example of OPCD outreach. It is true that OPCD's Dave LaClergue was invited to attend, but he was made aware that his part of the program would be limited to a five minute overview presentation. The bulk of the meeting's program - attended by over 200 U District residents (renters and homeowners) and small business owners - was devoted to airing views about the Upzone. It concluded with 45 minutes of audience comments given by a diverse cross-section of the U District Community, the vast majority of whom expressed serious concerns about the proposed upzones. Where are their concerns summarized and addressed in the Director's report?

The May 31, 2016 public forum was again a classic manipulative marketing opportunity used by OPCD to claim that it was reaching out to the public for input. But, as is typical of all such city-sponsored efforts, no questions from the public were allowed following the slide show. Questions were adroitly dismissed or deflected: "Go and speak individually to one of our staff members standing near one of the poster boards." There was no mention in the Director's report that the event was picketed by protestors holding signs that read "Down with the Upzone" and other messages opposing the Mayor's plan, and that dozens present endorsed those opposing views. The community opposition to the U District Upzone is huge-but is underreported in the OPCD's Director's report. This spin is a disservice to council members, and the report should be changed to better reflect reality.

To summarize Livable U District's Position Paper, endorsed thus far by scores of individuals and groups (and counting):

- **As a top priority, the city must develop and adopt legislation requiring impact fees** to ensure that developers pay their fair share of the costs of growth. The U District cannot substantially add residents and jobs with this proposed massive upzone without accommodating for the increased demand on infrastructure already stressed due to growth: services such as water, electrical and sewers, the roads, public transit, parks, open spaces, schools, community centers, libraries, emergency services, etc. It's what other cities do.
- The city must develop "First Things First" measures to address urgent livability issues such as conducting an **inventory of existing affordable housing** and requiring developers to replace **one-for-one any existing low cost housing** they remove. These measures are outlined in Livable U District's Position Paper and on its web site. Community groups and neighborhood individuals painstakingly outlined these concerns in their comments to the Urban Design's Draft

Environmental Impact Statement; but city planners largely dismissed this input when fashioning the upzone proposal.

- Furthermore, the city needs to **require a risk analysis for all proposed low income redevelopment** and provide mitigation for housing units that are being removed. Displacement of low income people is a contributor to Seattle's homelessness crisis.

Additional livable U District comments re: the Upzone-proposal

1. The underlying FEIS was inaccurate and outdated before it was published and adopted, and hence should not be relied upon as a basis for upzone policy decisions. For example, graphics showing existing buildings omitted many major projects that were then in the pipeline and under construction, such as The Bridges apartment complex that stretches for nearly two blocks between NE 45th and NE 4th.

The DEIS also lacked any meaningful discussion of the impacts of the UW's plans for a near-term vast expansion into its West Campus Institutional Overlay area. Indeed, the full extent of UW's plans are only this year coming into focus; and their plans for building many high-rise structures just south of the proposed U District Upzone area will greatly stress traffic congestion, public facilities and infrastructure throughout the Upzone.

The City must produce a supplemental EIS that updates and corrects the deficiencies in the old one before the Council considers taking action on any upzones.

2. The "Neighborhood Snapshot" chart on p. 7 of the Director's Report inaccurately portrays the U District neighborhoods that are subject to the proposed upzone. The 160-acre upzone area lies almost exclusively west of 15th Ave. NE. Yet OPCD's "Neighborhood Snapshot" chart includes statistics for huge swaths of additional land lying east of 15th Ave. NE and directly north of the UW main campus. Thousands of mainly UW students live in these irrelevant-to-the-upzone blocks containing "Greek Row" and multi-family and congregate residences. Including their numbers in the "Neighborhood Snapshot" skews the statistics. It is inaccurate and misleading for OPCD to assert that "74% of transportation trips made by U District residents are by modes other than driving alone" or that "75% of U District residents are between the ages of 18 and 29."

New studies and statistics showing the composition and demographics of the actual upzone area should be completed and carefully analyzed before an upzone proposal for that area is presented to the city council.

3. The Director's report falsely states that the "U District Partnership" is a "new coalition of neighborhood groups", and falsely implies that the U District Partnership's activities and actions speak for all in the U District. In fact, the U District Partnership is another name for the former Chamber of Commerce. **Many** small local business and long-standing grass roots neighborhood groups strongly oppose the political agenda of the UDP and its UW and special-interest dominated board. The UDP Board is composed completely of individuals who do not even live in the U District Upzone area; yet they have no hesitation to dictate to those of us who do. The vast majority (by a four to one margin) of business and multi-family residential owners were forced to contribute to the U District BIA which funds the UDP; but by no stretch should these unwilling BIA ratepayers be characterized as acquiescing in the UDP's attempts to be seen as representing them.

Livable U District wants to make clear to the OPCD and City Council that it is not a part of any supposed "coalition of neighborhood groups" led by (and represented by) the U District Partnership

4. Livable U District encourages the preservation of neighborhood character and identity. Planners say that they have heard the community speak to the importance of preserving the unique, quirky character of the U District. Yet, anyone with clear eyes and common sense can see that upzones mean the irretrievable destruction of all that's quirky and unique. For example, what will become of our treasured Hardwick's Hardware when its land is upzoned, its property taxes skyrocket, and this human-scaled one-story business is wedged between neighboring skyscrapers? Ditto the legendary Blue Moon Tavern, slated for inclusion in a 320' high upzone.

5. The Director's Report, page 14, accurately mentions that the local community is concerned about the residents that are being pushed out, but then diverts to describing how the city is in an affordability crisis and that "One of the key pieces of this proposal is implementation of Mandatory Housing Affordability requirements, to ensure that all future development in the neighborhood contributes to Seattle's stock of affordable housing".

Yet this proposal demonstrates no resolve to support an existing, and long time affordable residential community within the U District. Rather, it proposes measures that say in *no uncertain terms*, that it is slated to be erased.

We feel the City lacks empathy for the existing community and has devised a narrative that we must be a welcoming city, providing for the newcomers at the expense of current residents and their neighborhoods. We know this is fact and that longtime residents (30+ years) have had their rental homes sold and have been economically forced to move out of the City. We know of people who own their homes and are concerned about not being able to pay the property taxes that are going up and up. In the future there will be fewer and fewer staying who have lived here, raised generations of family in this, their "home."

Students are often those who share a residence in an older structure, who are of a lower income and, we suggest, won't be able to afford living in the University District once up-zoned. Those who can least afford the cost of commuting will be forced to spend what is to them a significant percentage of their monthly budget on transportation.

6. We doubt the OPCD's data about the impact of upzoning on the loss of affordable housing. The Seattle Displacement Coalition made an on-the-ground survey, *Impacts of Upzoning on Housing Affordability in the University District*, of all affordable units and interviewed tenants. They counted (pg 2 of the report) "approximately 1,200 units of affordable low income and moderate income housing in the rezone area of the U District that are vulnerable to demolition or significant rent increase due to increased land values and speculative market forces over the planning period (thru 2035), if the upzones identified in Alternative 2 of the EIS are granted." Yet OPCD claims that only "somewhere between 40 to 275 units may be demolished, depending on which sites actually redevelop."

This divergent data collected by the City planners and by a local affordable housing advocacy organization is great cause for concern. We believe that what Seattle Displacement Coalition found through their hard work is the real accounting of what will be lost and suggest that the City is giving a low ball number and not providing a realistic vision of what will actually happen when these properties are purchased and redeveloped.

The City must provide a trustworthy accounting of all affordable housing before instituting an upzone.

A first step toward collecting this data would be to simply add a question about rental rates to the annual rental registration forms the city presently requires of all landlords.

7. There are many great solutions proposed in the *Solutions to Seattle's Housing Emergency* produced by the Community Housing Caucus. The in lieu fee bargained for by the Mayor with major developers is faulty in that it does not require replacement of housing in the district. The effect will be that affordable housing will be built outside of the district where land is more affordable and money goes further; making residents who can't afford Seattle's prices and/or want better livability standards commute into the U District to work and study.

It is also a serious concern about the legality of the in lieu payments and whether they will ever result in the provision of affordable housing stock anywhere. If developers sue to challenge "in lieu" payment requirements, this provision could be struck down.

8. Implementation of MHA (Mandatory Housing Affordability) requirements will be moving forward in the U District **without giving the U District community a fair opportunity to participate in the same public process granted other neighborhoods.** This is greatly problematic also because in the future, if there are differences in what is eventually approved by the Council in 2017, there will be nonconforming developments because the U District was jumped ahead: you can't put the genie back in the bottle.

It is neither reasonable nor trustworthy for the City to assert that "if the 2017 HALA process results in different zoning standards than those applied through the 2016 U District rezone," that the city will be able to fairly execute revisiting and realigning zoning standards "with the citywide approach."

Director's Report, Pg 21-22

9. We question the wisdom and fairness of **Transfer of Development Rights** that are used to sell development rights of public properties, and the concept of allowing developers to, in general, purchase development rights anywhere in order to be allowed deviations from development standards. It appears that under the presently proposed scheme, a TDR-using project located many blocks away from the TDR site could be built much higher and wider than the code would normally allow. Neighbors immediately adjacent to the "historic" or "landmark" site would be spared the pain of having a large new structure in their midst; but neighbors geographically distant would be burdened by the higher, wider structure in their midst. If used at all, the concept of TOR must be geographically limited to a small one or two block area around the proposed new development site. As for selling development rights to public properties such as the fire station and library: What public entity would receive the money, and administer and guarantee that the structure protected by TDR is maintained in perpetuity? The prospect of selling development rights to public properties in the U District has not, to our knowledge, been discussed or vetted with the community.

TOR should be stricken entirely from the proposed upzone ordinance.

Summary

The U District upzone and accompanying HALA mandatory requirements represent more of a Grand Sell-out rather than a Grand Bargain for the University District. We are being asked to sacrifice more of the physical and social character of our community for upzones that will not pay for or provide infrastructure and amenities to make our neighborhoods livable. Long-time residents and small business owners have paid their taxes, voted for elected officials, participated in their civic duty, volunteered in

the community, raised families, grown old, and are the glue that holds a neighborhood together. OPCD's plan demonstrates little effort toward developing any reasonable solutions to preserve this community (such as down-zoning some lowrise blocks, and taking strong steps to preserve livability amenities). There are reasonable ways to create density, ways that allow growth while still allowing current residents to continue their lives in their longtime homes and neighborhoods. This upzone proposal is sorely lacking in them. The Livable U District Coalition does not support any upzones while serious problems persist in the University District. We have *no faith* that the OPCD proposal will provide more affordable housing in the district, that necessary concurrent infrastructure-including proper plans for storm overflow of sewers that pollute our waters; electrical and water service upgrades to serve an increased population; transportation systems and parks to mitigate for increased density-will be in place to support the growth, and that our residents and small businesses won't be picking up the tab, financially, emotionally and materially.

Livable U District urges the OPCD and Council to immediately suspend plans to upzone the University District until the measures identified in our position statement and the above comments are addressed. The City must Tackle First Things First.

1 Watch: <https://www.youtube.com/watch?v=QEzQvl8kzls>

2 <http://www.zipcon.net/-jvf4119/U%20District%20Housing%20Survey%20Revised.pdf>

3 <https://assets.docume tcloud.org/ documents/1687 633 /community-housing-caucus-report.pdf>

I have a concern that the incentive zoning combined with the MHA will be too cumbersome and not achieve the desired results for the community. I suggest that the City instead calibrate the MHA to achieve more affordable housing from the upzone. Or, if you really must keep the incentive zoning then you should add affordable housing back to the menu of options. It's still a public benefit (and more valuable than many of the others in the incentive zoning menu, in my opinion) and should be offered to achieve the max zoning potential.

I also question the proposed requirement of street level commercial/retail in the proposed SM-U zones. Pushing developers to either include commercial space or give away that amount of square footage through a set back in an all residential building may result in over supply of small retail spaces or missing out on additional housing units.

I have lived and worked in the University District for 17 years, and raised my children here, and I have valued the diversity of the neighborhood and its many small businesses. While I appreciate the hard work that has gone into writing a new zoning plan for the neighborhood, I write to oppose the zoning changes currently proposed—**not** because I am opposed to increased density or to change; I recognize and support the need to increase density and multifamily housing throughout the city. I oppose these changes because they seem to primarily benefit real estate developers and the UW administration at the expense of residents, local businesses, and ordinary community members. More broadly, these proposed changes do not advance the broader goals of social equity and environmental sustainability to which the City has committed itself. Community concerns are addressed only through various developer incentives, which I believe is wholly inadequate. The City of Seattle should enact developer impact fees and stronger policies regarding displacement before proceeding with a zoning change of this magnitude.

Specifically, I oppose this plan because:

1. There are no substantive provisions for increasing open and green space despite dramatic increases in density. The only provisions for open space are developer “incentives,” which are likely to be ignored or, if not, met in most cases by providing a “plaza” or other small private “public” space on-site. Meanwhile, the increased density will undoubtedly remove trees and the few green things that currently exist in the neighborhood. Seattle can and must do more to create open space and livable neighborhoods. Locating and developing park and open space will not happen if left to the future, as rents and land values rise. Serious investments in open space must be made **before** upzoning occurs.

2. There is no attention to the fact that these changes will result in the displacement of existing low-income residents. At a moment when Seattle is facing an unprecedented and heartbreaking homelessness crisis, the U-district provides some of the most affordable housing in the central city. (It is also among the most racially diverse neighborhoods in north Seattle.) These small, low-rise apartments and multi-person single-family homes will be among the first to go. When faced with MHA requirements, developers have overwhelmingly chosen in-lieu payments. Building affordable housing elsewhere will not help those who are displaced here. A serious plan would require one-to-one replacement for lost affordable housing in or near the neighborhood. We should try to get this right.

3. There is no viable plan for public transportation in place to support such an upzone. The arrival of the much-heralded light rail in 2016 will not solve the U-district’s current problems, much less those that would be added by this upzone. People do not travel only to downtown and back. Kids need to get to school and to soccer. Groceries and hardware need to be purchased. People work in neighborhoods other than downtown. Residents need to travel to parks and other open space. The U-district’s connections to other neighborhoods have been **cut** as a result of light rail and budget constraints. The city and Sound Transit need to develop a viable and multi-pronged transportation plan for the neighborhood to support the proposed level of development.

4. This plan seems to be designed primarily around the needs of the UW (for increased office space), rather than the broader community. Although there has been much discussion about the high-rise towers allowed under this plan, in fact, residential high-rise towers are very expensive to build and likely wouldn’t be built here in the near term. What is most likely to happen in the near-term as a result of this proposal is the construction of many 15-story office buildings (with 24,000 square-foot footprints). These buildings, enabled by the “Seattle Mixed” zoning, will decrease housing by displacing several existing low-rise multi-family buildings; yet they will not contribute to the “diversity” or “vibrancy” of the neighborhood. They will be vacated at night, leaving the area less safe and less friendly.

Please take time to look back on City planning successes before marching forward with this new Transit Center zoning slated for adoption in the University District “UD”. Please note that the UD upzone, HALA initiative outlined in the Seattle Comp Plan 2035 and the University of Washington “UW” Master Plan need to be considered in tandem, not separately.

Many promises were made to Seattle neighborhoods with the invention of Urban Centers. Giveaways were handed out to developers for real estate tax exemptions (MFTE), relaxing of zoning height and bulk restrictions and no development fee assessment for needed infrastructure maintenance, repair or expansion. We were told these zoning fiscal policies would bring us affordable housing and be contained within a specified Urban Center outline. These changes also came with the promise that as build out

occurred the neighborhood would retain access to views and sunlight. We were promised there would be the inclusion of public open space providing relief to the community for the increased density. These were all false promises.

Now embedded in our Transit Center zoning are plans for development but no consideration for community needs outlined in the GMA mandatory elements of growth: 'The 2013 Urban Design Framework contemplated that an upzone would not be considered in isolation; rather it would be part of an integrated package conforming to GMA concurrency requirements.'

The lack of inclusion of community interests as required by the GMA and alignment with community consensus from the years of public hearings leading up to this EIS are nothing short of criminal. Care and feeding of developers and large property owner interests do not make for a neighborhood. The elements of HALA contained in the upzone for Mandatory Housing Affordability "MHA" smack of the same poor design of the MFTE. Giveaway real estate tax exemptions and the lack of development fees were/are supposed to bring successes for providing affordable housing even though the provisions of the MFTE proved to be a failure.

Restricted Parking Zones "RPZ" parking policies meant to improve congestion have only resulted in back yards being converted into parking lots. Though the Zoning department turns a blind eye on the destruction of yards in favor of parking lots they will not enforce the 'only up to three cars' rule as some yards boast up to nine spaces for parking and zero yard. The only case I've witnessed where they have enforced the number of parked cars in a yard (limit three) is in the case of a city licensed auto repair shop in my single family neighborhood. Despite the fact that the owner freely parks and moves vehicles to and from 'street' parking in violation of SMC 11.70.200 a zoning inspector merely says 'what's the problem, he's only moving cars on and off the street to work on.' Parking enforcement also turns a blind eye on this business stating they won't set up a 'sting' operation to enforce this ordinance. They fail to enforce the RPZ two hour limits or cite vehicles placed on the street without current tabs. Failed promises and failed policies are just that, failed. It seems queer to me that City policy has allow new construction without parking because we are a Urban Village/Transit Center where everyone can bike, walk or take a bus however they issue RPZ permits to these residents. The no car policy is enhanced by the University District having the west coasts' largest Audi dealer, because nobody will need cars.

As a long time resident I have paid property taxes that started out at a bit more than \$200/yr. In the years I've lived in the UD I've witnessed massive density increases (traffic, destruction of our tree canopy, huge boxes constructed lot line to lot line, lost views) and enjoyed an increased tax burden. I fail to see any reciprocation in services from the city agencies I fund. Residents increased tax burden are confounded by the Cities' give away of real estate tax exemptions to developers (MFTE) and the lack of assessing development fees. When the bill for infrastructure improvements comes due it will end up being paid by single family and non-MFTE/ MHA property owners. I suggest before authorizing massive upzones envisioned by our Transit Center upzone that the Council seek and put in place measures providing equity to the neighborhood for what they have given up to development.

It is my sincere hope that the boundaries worked out by the neighborhood and city for our Urban Center will be adhered to. These boundaries were affirmed through years of public deliberation leading up to our proposed Transit Center zoning. These boundaries disappear when considered in the context of what the Comprehensive Plan 2035 calls for, elimination of Single Family "SF" Zoning to accommodate more growth and provide affordable housing. This proposed upzone coupled with the Comp Plan 2035

and the UW Master plan make a joke of the neighborhood planning process conducted by the city during the three years of the University District Livability Partnership that preceded the EIS.

PLEASE provide some continuity between these three plans as several issues are at conflict. We are now being told to achieve affordable housing choices there is a need to expand development into our SF neighborhoods. This means the plans and 'give aways' outlined in our Urban Center zoning failed to provide these amenities.

The boundaries of our Urban Center were left largely intact in the EIS for new Transit Center Zoning however the Comp Plan 2035 ignores these boundaries and wants to expand into what is left of our SF neighborhoods. This might be a recipe for a perfect storm as the UW has yet to release their Master Plan.

The HALA initiative outlined on the Seattle Comp Plan 2035 calls for "increased opportunities for multifamily housing, especially in areas near transit, services and amenities, bolstering the urban village growth strategy by:

Rezoning single family within urban villages to allow more intensive development where City is targeting growth; and

Expanding boundaries of urban villages to reflect walking proximity to amenities."

The Comp Plan examines several ways to achieve these goals:

"LU5.7 Employ development standards in residential zones that address the use of the ground level of new development sites to help maintain existing patterns of landscaping, especially front yards in single-family residential areas, and to encourage permeable surfaces and vegetation."

"LUG8 Provide detached single-family and other compatible housing options that have low heights, bulk and scale in order to serve a broad array of households and incomes and to maintain an intensity of development that is appropriate."

- "Respond to neighborhood plans calling for redevelopment or infill development that maintains the single-family character of the area but also allows for a greater range of housing types"

"LU8.3 Consider allowing redevelopment or infill development near urban centers and villages, where that new development would maintain the low height and bulk that characterize the single-family area, while allowing a wider range of housing types."

It is my hope that the Council can see the failure of this envisioned policy by looking closely at the result of new construction in a Single Family neighborhood that was rezoned to LR1 as part of our Urban Center. The promise was to provide increased density and availability of affordable housing. The building design in the enclosed examples are similar to what the HALA initiative calls modular and a fitting density for SF5000 zoning that: "would maintain the low height and bulk that characterize the single-family area."

Examples of this failed policy can be witnessed near University Playground on the west side of 9th Ave NE in the 4700 block. Three SF homes were destroyed along with all the vegetation. Between these three houses lived fifteen people paying \$500/mo. Three houses were replaced by nine three story buildings selling for \$600k each. You can now rent a two bedroom apartment for \$3k/mo. The King County Assessor lists each of the nine houses as containing three units so there was a density increase however the affordability went from \$500/mo. to \$1500/mo. per unit. In addition the last two story SF home on the north end of that block is shaded much of the year (see below picture).

The surrounding houses now enjoy a view of bulky multi colored boxes plus their lost access to sunlight. A back yard 'cottage' was constructed just to the west of this project that dwarfs the original house in the front yard and robs others of access to sunlight and views of the skyline.

On the east side of 9th Ave NE adjacent to the University Playground a SF home was raised for the construction of the three story cement block. All the vegetation including two large fir trees were removed for this project. A tree in the yard of the home to the south was damaged and may or may not survive. SF homes on the north and south side of this project now look out on bare walls of this building instead of the sky and are shaded from the sunlight they used to enjoy (see picture below).

Spelled out in the Seattle Comp Plan 2035 are provisions to spread a little more density into our SF neighborhood zones to increase housing affordability and availability through use of 'modular' 'flexible' buildings that offer a compatible use in SF500 zones. As can be seen in the above examples three story modular houses are not compatible in SF500 zones.

The take-away should be that one neighborhood cannot be all things to all people. Development needs to be confined in the areas outlined lined in our current Urban Center/Transit Center delimitation. The success or failure of the zoning polices defined in the current EIS should be allow to play themselves out before destruction of the rest of the neighborhood occurs.

Again, we were promised that our Urban Center zoning coupled with builder incentive programs would provide affordable housing, family housing, open space and access to views. Reading between the lines of the Comp Plan 2035 which will follow our Transit Center upzone is the admission of the failure of that policy (Urban Center) and the marching orders to continue sprawl into our SF neighborhoods even before the promises of Transit Center zoning have a chance to be realized.

I urge the City to adopt policies that stay within our Urban Village/Transit Center outline and work towards providing the affordable housing promised along with all the other 'promised' amenities before blindly continuing neighborhood expansion and decimation of perfectly fine housing stock.

U DISTRICT UP-ZONE: FORMAL COMMENTS

JULY 11, 2016

BULLET POINTS:

1. **Character of the Neighborhood**
2. **UW vs. The U District**
3. **Counter demands**
4. **Reality vs. idealism**
5. **The entire picture**

CHARACTER OF THE NEIGHBORHOOD: *"Balance regional with local: The U District has its own patterns and flavor... As light rail increases the regional influences, maintain elements of the eclectic local character."*

1. **New development or major reconstruction must honor, respect, and preserve the historical uniqueness of our district. This requires the establishment of design standards that are specific, not vague, wishful phrases that don't hold the developer accountable to his prose. Often a**

project will claim to blend in with the surrounding community and yet the actual drawings expose that prose as ersatz. The description must conform to the drawings and to specific, meaningful, quantifiable, and enforceable standards. This does not require that a new building be a carbon copy of past architecture; it only demands that its features and bulk not be harsh and out-of-proportion, thereby overpowering the existing sense of community. All one has to do is look around to discover examples of compatible construction, which can and should provide inspiration for future development, if only the city would create the incentive to do so. Of course, there are also endless examples of new buildings that seemingly involved little or no consideration of the local flavor, specifically the box-shaped, LEGO buildings, which are now infiltrating the entire U District without any concern for their negative impact. If new, strongly-worded, design standards can at least put a halt to this type of construction, that effort alone would be considered a great success.

2. Historical architectural protection should not be confined simply to those structures placed on the historic landmark registry, but to the representative variety of buildings that contribute to the neighborhood's identity. Special protection should be given to buildings that provide a substantial amount of affordable housing units and that are clustered into a historically significant sub-community. Furthermore, developers must be required to document the number of affordable housing units lost and replace them at a 1:1 ratio within his new project before any demolition and construction permits are issued.
3. The city should reconsider its decisions regarding Conservation Districts; or, in its absence, the city should involve the neighborhood in creating specific design standards that are not city wide, but rather reflective of the history and unique character of that neighborhood. Needless to say, these standards must be detailed, with specific requirements, not vague descriptions. Without these safeguards, the neighborhood will lose its identity, making its label meaningless. This would be a tragedy, as it is the many neighborhoods and their patchwork that make Seattle a wonderful place to live... and an exciting adventure for our traveling guests. (Note just how important the tourist industry is to our economy!)
4. The city must balance the ever-dynamic needs of the short-term residents in the University District with those of the more established, long-term residents. Students, other residents, and even businesses, who come and go, make demands, place undue pressures on our neighborhood, only to depart, when their needs and goals change, leaving behind a mess for the rest of us to clean up! It is unfortunate that the majority of our transitory residents never really see themselves as belonging to any neighborhood or a larger community outside their self-interests. The location of their dwelling units is viewed merely as a place to eat and sleep. So, while addressing their needs and concerns is valid, any corresponding proposals must be viewed in proper context.
5. If the city is not just trying to increase the density in the U District in anticipation of population growth, AND if it is also concerned about the quality of the neighborhood, it must offer design standards that promote a sense of community, such as the following:
 - a. Grand entryways that face the street
 - b. The absence of barriers to a sense of community, such as massive walls, tall, solid fences, tall vegetation, etc.

- c. The softening of any negative impact caused by garages, garage entries, garbage can locations, etc.
- d. Effective lighting and non-cement landscaping that bring color and sense of harmony and vibrancy.

THE UW vs. THE U DISTRICT: “Improve integration between UW and the U District”

1. The statement above is very disingenuous, given that the entire plan fails to address or even acknowledge the parallel efforts of the University in their upcoming Master Plan. Their anticipated population increase and its impact on the entire district are ignored and therefore unaddressed, within the parameters of the Up-Zone proposal.
2. The city must acknowledge the ever increasing influence, impact, and control that the University has over the U District. At a recent UPCC meeting, the UW representative boldly declared the University’s goal to be more involved in the U District, especially regarding future planning and development. When questioned to what end, she seemingly was unable to appreciate the fact that the U District is a separate entity, one that should not merely exist to serve the needs of the University. Any over-dependency on the University in our neighborhood is no better than over-dependency on a specific industry. Right now the UW is working toward spreading their tentacles throughout the district, directing the construction of buildings for upstart technology businesses and health care offices. What happens when the next bubble bursts? In order to have a successful neighborhood, the U District must be encouraged to grow independently of the University, creating a diverse population of families, businesses, and long-term residents.
3. The city must represent the entire community and its overwhelmingly unified agreement that we are in need of a centrally located public square. Although this goes against the UW’s vision for the district, the city must represent the larger community against its proposed high rise to be located directly over the transit station.

COUNTER DEMANDS:

The proposed U District Up-Zone should include a formal commitment to accountability, monitoring and, evidence gathering, in order to document that the stated goals are being met. Enforcement should also be structured within the proposal, along with a mechanism to steer the course ahead based on incoming data and analyses. This will enable the city to respond quickly and responsibly to address any adverse impact, any negative use of loopholes, and any unforeseeable changes that require immediate attention.

1. This plan contains deficits in areas that the city simply refuses to address, such as mobility, schools, and disaster preparedness. As a result of implementing the up-zone, which will necessarily increase the population density and diversity in the U District, escalated efforts must be made to implement a locally centered Emergency Preparedness HUB, in anticipation of disasters, man-made and natural. We need to prepare for a situation in which chaos and widespread destruction may make it difficult to address the onslaught of injuries and safety hazards, especially involving our most vulnerable neighbors. The city cannot simply state that

this is the voluntary responsibility of the local community, especially given the liquid nature of the population and the bull's eye target that hovers over the UW campus. It is very difficult for the long-term residents to independently develop a system that will address everyone's needs and hold the community together during a time of crisis, given the major ebb and flow of the majority of the local population.

2. Developers should be required to consider the total amount of energy already consumed in creating the structure to be demolished. One way to show respect would be to enforce the recycling of any usable structural features, as a valuable resource to the public. Owners of an older structure need a source of material that is compatible with the age and architectural integrity of that structure. Furthermore, the city must eliminate the loophole that provides the builder with the excuse that such efforts would be a financial burden; if a development is so costly to begin with, perhaps the project should be downsized to reflect a more realistic ambition. The city should also point out that the entire act of recycling would not only be a good PR move, but it would be environmentally correct.

REALITY vs. IDEALISM: The bold and grand goals of the City and its Up-Zone proposal require a dose of reality:

1. The city wants to welcome a diversity of residents to the U District: *"Provide choices for residents of all ages and income levels."* Unfortunately, the plans boldly make the following claims: *"High rise residential buildings tend to produce smaller, higher quality, and more expensive units that could appeal to retirees and professionals."* Beware of this declaration, which will simply substitute one problem with another problem. Presently, groups of various backgrounds and income levels are separated horizontally by neighborhood location; but this will only lead to a vertical separation, as those with wealth become isolated in their lofty residences overlooking the district while monopolizing views over the horizon. (Note that I often ask people who live in high rise whether or not they experience any sense of community: every single person had to admit that he didn't know anyone in the building, nor did he share any social interaction within the community below).
2. *"Provide a network of great streets and public spaces that creates inviting, memorable neighborhood spaces [and] support public life."* This statement should prompt us to ask the question, "How?"
 - a. The city must make sure that a variety of green spaces are scattered throughout the neighborhood, especially given efforts to prevent children from walking on their own to local neighborhood parks.
 - b. Any public spaces must be multi-purpose, unlike the sidewalk cafes constantly discussed by the City as promoting a sense of community. Other images from the city are equally simplistic. Scenes of people dancing in the street may make for colorful inserts, but they do not completely reflect the variety of uses that should be available in the limited open spaces provided for a diverse population.
 - c. The city must be conscientiously aware of the following: Seattle is a narrow city, sandwiched between two bodies of water, including narrow streets and sidewalks. Just where are these sidewalk public spaces going to be placed, given that many buildings

extend over their setbacks (especially if you include their protruding balconies); and future café owners will be allowed large portions of the sidewalks for their outdoor tables and chairs? The city must also make sure that it selects trees that don't damage the sidewalks (causing impediments to pedestrian usage), that don't require too much maintenance, and that are native, thus not requiring frequent watering.

3. The city must be honest in its use of data as it justifies its proposals and eventually quantifies the success of the plan. There seems to be major conflict between the city and neighborhood groups regarding statistics and even the definitions of terminology, which directly impacts the implementation of the plan.
4. The city must recognize that the Up-Zone proposal alone is creating a sense of euphoric anticipation, creating escalating property values and property taxes, as land owners seek to optimize profits through speculative sales.
5. The city must recognize that city-wide regulations don't necessarily lead to uniform outcomes, as each neighborhood has its own pressures and unique issues, such as 8 unrelated adults per unit, parking, traffic, garbage, noise, and lack of respect for personal property.
6. A healthy community through diversity must include families, supported by schools and other services. Unfortunately, the city used circular justification: no families, therefore no schools, therefore no families, etc. Gone are the days when the U District could brag that it was a place where one could walk to school from kindergarten to graduate school.
7. The city planners are great at sketching ideal images of people dancing in the street and others sharing stories over a cup of coffee, but they provide no proof, nor can they that any of these anticipations will become reality.

THE ENTIRE PICTURE:

1. The City must not remain as a quagmire of isolated departments that fail to cooperate or provide mutual support.
2. The city must listen to those who will be most affected by the proposed changes within the U District, not those who will receive the greatest financial benefits.
3. The city must put aside all preconceived beliefs that certain neighborhoods are only interested in blocking any and all growth for the status quo. Perhaps, just perhaps, they have honest and productive viewpoints and ideas that could make the Up-Zone better for everyone. Remember that a plan is only as good as it is inclusive. Bringing all groups on board will lead to a greater sense of ownership of the entire process.
4. There are many laudable goals of the plan, including a variety of buildings and heights to prevent rows of breadbox styled construction, open spaces between towers, creating a community of diversity, and establishing buffer zones or transition blocks to minimize the overflow and negative impact on peripheral family neighborhoods. Will the specifics of this

plan accomplish these goals? Only time will tell, but will it tell us soon enough to make any necessary corrections before the negative impacts arrive?

5. **MOST IMPORTANTLY:** The City leaders must consider the realistic long-term impact of the Up-Zone proposal on the integrity of our neighborhoods, and ultimately on the identity of Seattle. Without any sense of stability and security (not necessarily the permanent attachment to the past), homeowners and long term renters within a neighborhood will no longer view their homes and their community as deserving of their commitment. These noble viewpoints will be superseded by financial goals to meet ever-shifting ambitions. Eventually, property will be abused, while any investment therein will be limited to how much of a profit can be made and how fast. (If you don't believe this, just check on the past trends in Seattle, including Capitol Hill.) This could spiral out of control throughout the neighborhood, leading to more uncertainty, as families and long-term residents flee to other communities, seeking once more a sense of security and stability. This will also leave a gap which will be filled by aggressive speculators. Ultimately, it will produce a city that floats on a precarious sea of turmoil, along with a loss of its identity. A city cannot survive if it is always 'under construction' and if the flow of daily life is always hindered by endless 'detours'. Although the new generation is now experiencing a greater sense of mobility, we believe that having a sense of belonging is sure to bring to the wanderer a sense of purpose and stability.

There are many specific concerns which we addressed in a prior e-mailed letter, so this comment letter has been devoted to the discussion of broader issues. But one more observation must be included here: While it may be true that any major delays in the implementation of this up-zone could exacerbate a negative situation due to present outdated regulations and an uncertain future; likewise any rush could lead to rapid development, at a rate which the city may be ill-equipped to direct and manage.

Our family is grateful for the opportunity to be included in the conversation and, hopefully, in the ongoing efforts to renew the U District as a great place in which to live, raise a family, study, work, play, and even pray. Let's keep the lines of communication open, as we seek a path forward to create a future that is inclusive, respectful, and full of hope.

Our family has lived in the University Park Neighborhood since 1955. I was reviewing the massive University District Up-Zone Plan, and as I tried to decipher its many nuances, I wrote down the following questions and concerns. Could you help me resolve them?

12. What is the definition of the term 'apartment'? What is the definition of a dwelling unit? The section covering Density Limits in the LR Zone states this: *"In LR1 zones [comma] no apartment shall contain more than three dwelling units..."* (page 10) Does this refer to a triplex?
13. In spite of that limit, the following loophole is also included: *"One additional dwelling unit may be added to an existing residential use regardless of the density restricts ... [This includes # 1 above]. An additional unit is allowed only if the proposed additional unit is to be located entirely within an existing structure, and no additional floor area is proposed to be added to the*

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MATTER!**

existing structure.” (page 10) This section is very worrisome to me and conjures up the following concerns:

- f. Is there a code that requires that each dwelling unit be a certain minimum square footage of livable space? If not, this exception just allows a landlord the ability to cram another rental unit into his building, or in our case, another 8 unrelated adults. Thus the proposed density increase is not as benign as it might appear at first glance.
 - g. How can the city declare the density in #1 above and then allow this loophole, without any demands placed upon the rental owner? How many other loopholes are scattered within the plan that would also impact the neighborhood negatively?
 - h. Do the rules in #1 and #2 include condominiums?
 - i. Does the property owner have to obtain a permit to build the new unit, in order to make sure that it meets certain standards, especially those within the RRIO ordinance?
 - j. Does the property owner have to revise his RRIO registration paperwork accordingly?
14. In various places, the Pike-Pine Conservation District is mentioned. I thought the city (through HALA and the Mayor’s preference) decided there would be no conservation districts. Why the inconsistency? Perhaps the city should reconsider the concept of “Conservation Districts” or at least local design standards, to provide each neighborhood with a sense of identity and stability. This is especially important in the University District, in which our short-term residents come and go, create issues and make demands, only to disappear, leaving the permanent residents and businesses behind to deal with the mess.
15. In various places, there are regulations listed for neighborhoods other than the University District. Specifically, on page 16, we find the following section: *“West Seattle Junction Hub Urban Village. The following provisions apply to development in the NC3 85 (4.75) zone.”* (page 16) What does that have to do with the U District Up-Zone?
16. When the new up-zone goes into effect, does it only cover completely new construction or does it also cover any major redevelopment of an existing structure, such as additions, repurposing, upgrades, etc.? Perhaps the city should provide incentives for property owners to redo existing structures in order to increase its density, while keeping the character of a building that reflects the character of the neighborhood (and perhaps this option is already discussed within this proposal).
17. Is there any discussion of light pollution within the plan?
18. **Is the city taking into the equation the fact that Seattle is squeezed between two bodies of water and that our streets and especially our sidewalks are quite narrow?** Without any meaningful setbacks, including balconies, etc., the pedestrians will be confined to walking in a single line along the sidewalks, within the shadows of the adjacent structures; surely this is contradictory to and even incompatible with the creation of socially interactive public space. Furthermore, will the owners of the sidewalk cafes have to provide room for walkers and will they

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have to pay rent to the city for any public space they use? (Note that cafés should never be considered a major solution to the need for open, green space as they are not multi-purposed, they don't meet the needs of many adults, and they don't include appropriate space for our active children.)

19. Through this up-zone proposal is the city's main goal only to increase density and affordable housing options for diverse populations? OR is the city concerned about creating a neighborhood in which the residents and employees feel safe and secure, in which a true sense of community is promoted, and in which the character of that neighborhood is respected? If so, the city needs to make sure that the design standards are not vague, easily manipulated, and unenforceable. Furthermore, the prose must match the images; for example, if the architect states that his concept parallels, respects, and adds to the local architectural detail, then he needs to justify that comment. Often, when I review the drawings of various projects, I see no proof of the written word. If the architectural compatibility of these design details is NOT obvious to the public, are they simply being used as a ploy to win favors and incentive 'points'? There are many ways that design standards can be used to create a positive impact on a community without creating an undue burden on the developer. Here are a few possibilities:
 - f. Grand entrances that face the street
 - g. The absence of barricades to the street, such as tall walls or fences, cement walls, solid fences which don't let natural light shine through, and tall vegetation, such as bushes.
 - h. The softening of anything that is uninviting to the public, such as massive garage doors and entrance ramps, garbage, etc.
 - i. Lighting options
 - j. Softened landscaping that is not simply cement walls and paths.

20. The city must be truly conscious of the fact that rules and codes have different impacts within different communities. An example is the rule that eight unrelated adults can live in a single unit, which is a major factor in impacts such as garbage, noise, parking, etc. In fact, the parking issue is exacerbated by the city's denial that people own cars and need off-street parking options! Additionally, the city must reinforce a cooperative attitude among its many governmental departments. This includes the following:
 - d. Compatible use of terminology, such as 'units'
 - e. Communication of various issues, such as violations of rental standards, parking regulations, and the maintenance of properties
 - f. Enforcement of codes, especially those that involve health and safety.

21. The City's website has the following bullet point: *"Build an environmentally sustainable neighborhood"*. The city and the builders must include in its environmental impact calculations the energy that will be lost if a structure is torn down, that is, the energy that was already used in its construction and the environmental impact of the material ending up in a landfill. The government must prevent creating a city that is committed to 'planned obsolescence', in which there is a constant and revolving cycle of demolition and reconstruction, simply to increase the

tax basis of the city. The city should also demand that any usable material be recycled without the builder being able to claim that this effort would cause a 'financial burden'. Many older homes and other buildings have basic items that homeowners would love to be able to access, such as doorknobs, doors, trim, windows, ornate detail, etc. If recycling these precious items is a financial burden, then perhaps the developer should rethink his entire project. Remember, it is not the job of the city to help the developer make a profit! And, don't forget that the developer could profit by appearing to be a more responsible neighbor, don't you think? That PR alone would go a long way to obtaining the support of the community surround the new development.

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22. **The most important issue I have saved for last!** The statement on the city's website that causes me to cringe is this: *"IMPROVE INTEGRATION BETWEEN UW AND THE U DISTRICT"*! To what end is this being promoted ...to the advancement of the UW and its efforts to expand its influence, impact, and square footage? What about protecting the separate integrity of the University District as a unique neighborhood in and of itself. While the University is obviously an important member of the community, the district should not be viewed as its petri dish for its experimentation and control.

Here is one suggestion regarding the actual ordinance page: Since the document is so large and each section involves so many pages, in an outline format, is it possible to state the section title on the top of each page, so that a person doesn't have to constantly flip back several pages to recall what section he is reading?

Our family appreciates any reflections and insights you may offer. I will do my best to make my formal comments clear and unencumbered by emotions. Our entire University Park neighborhood is grateful for the additional weeks allowed within the comment period. And we thank you for your many years of dedicated service to the City of Seattle and all of its people.

I strongly support the U District Urban Design Plan which includes much needed upzones. OPCD has come up with a plan very sensitive to the community's needs.

"The proposal would allow greater height and density in the blocks surrounding light rail at NE 43rd St. and Brooklyn Ave NE."

I believe this is the minimum we should be doing to address our housing affordability and climate crises. Strong Transit Oriented Development (TOD) is critical.

"The proposal would also implement new affordable housing and open space requirements, as well as incentives for childcare, historic preservation, and street improvements."

I believe these are considerations that demonstrate a sensitivity to neighbors' desires for a livable community.

I believe all of the following are valuable contributions to my community:

- Requirements for **mid-block corridors** on sites that exceed 30,000 square feet and abut two avenues (north-south streets);

- **Modulation requirements** to add visual interest to the public facades of buildings;
 - **Street level requirements** to increase transparency, limit blank facades, provide for ground-level businesses, and allow for direct access to ground level commercial spaces;
 - *(Question: Will there be live-work spaces for artists?)*
 - **Open space requirements** for residential development with more than 20 units (equal to or greater than 5% of all residential floor area) and public open space (e.g., plazas and atriums) on sites exceeding 30,000 square feet that equal 15% of the site area or more; and
 - Requirements that **landscaping** meet the minimum requirements of the City's **Green Factor** landscape scoring system."
- (I took these points from The Urbanist's article [here](#).)

I am very much in support of an **open space plaza** in the U District and hope that there is a detailed activation plan through collaboration with the UDP, BIA Advisory, UW, CUCAC and UDCH and many other groups in the U District.

The very well-attended and facilitated U District Square Open Space Forum introduced me to city government process in Seattle.

I have continued to be impressed with their work and think they have gathered a **true representative voice** of the U District Community. There is broad support and desire for a centrally located large open space plaza.

I ask that the PLUZ committee carefully consider expanding urban village boundaries to include all properties in the NW U District up to Ravenna Blvd and over to the highway. **This location could easily allow current and future residents to live low carbon lives** conveniently between two light rail stations. We must do more to allow three flats and other missing middle housing to be built here.

We are writing today to comment on the U-District upzone proposal as described in the OPCD document "U-District Urban Design: Draft Recommendations." We have lived in the District for 28 years, raised two children here, and participated actively in community life here. We are both past-presidents of the Roosevelt Neighbors' Alliance and have served on various community boards. One of us (Eric Larson) currently serves as the RNA representative to CUCAC. (In this letter, we are speaking only for ourselves, not RNA.) One of us walks to work at the University and the other commutes to work by bus from the District. Our neighbors include other homeowners, students, and other young people who share houses on our block. Our neighborhood is diverse with respect to age, ethnicity and income. The beautiful new University Food Bank and LIHI sponsored transitional housing for homeless youth is about 100 yards from our front door and have been welcomed by our neighborhood. In short, we live in a neighborhood that, despite its problems, is diverse and vibrant. What the draft report describes as unique and quirky about the U-District (and which OPCD claims to value), is an expression of its underlying economic and demographic diversity and vibrancy. The absurd levels of development that would occur under upzone proposals contained in the Draft Recommendations will allow the construction of higher density, less affordable, housing, and undermine an EXISTING stock of affordable housing attractive to many different people with differing levels of income. This is already happening near University Playfield, where three moderately priced bungalows were demolished and replaced by nine "skinny houses" that sold for in excess of \$600,000 each. The housing stock that would be created under the proposed upzone would consist primarily of high-end units that most City employees could not afford and blocks

of 200 square-foot cells with shared cooking facilities. Nice for the developers, not so nice for people seeking affordable houses.

The U-District envisioned in the Draft Recommendations fundamentally misrepresents the character of the neighborhood, its residents and its diversity. Developers may need a new zoning map of the U-District for their purposes. What residents and businesses in the U-District need is something else entirely. For example, we need City services to help care for our homeless neighbors. We need more open space for recreation and an enhanced (not decreased) tree canopy. We need an honest and realistic assessment of the inventory of affordable housing in the District and how much can be retained/replaced under various development scenarios. We need a realistic approach to parking requirements for new buildings (not wishful thinking about levels of car ownership).

already HAVE a diverse, vibrant and densely populated neighborhood. Can we take some more density over time? Of course – but not until the services, infrastructure and an honest, values-based plan that really addresses affordability is in place to guide those efforts. Anything less is not “Urban Design”; it’s just an upzone that benefits no one but developers, causes harm to residents, and decreases the possibility of maintaining neighborhoods of true diversity in Seattle.

We respectfully request that OPCD suspend this upzone process until these key issues of livability and infrastructure are addressed.

Approximately 95% of all dwelling units in the University District Urban Village, based on the most recent development numbers, are rentals. Approximately 95% of the residents are renters.

There are only 7,200 dwelling units in the entire urban village.

With the planned light rail opening, if the University District isn't upzoned, many of these residents will be forced out. University of Washington students will have fewer options as they face fierce competition for a small number of units from both incoming and current residents looking to relocate closer to light rail and downtown.

Those arguing the loudest to stop the upzones are largely incumbent homeowners. This 5% of residents will fair incredibly well with the expanded light rail system. Their home values will continue to skyrocket. They will have significant options if they need to move on. This is not true for renters.

The OPCD has spent years working with local residents, property owners, businesses, the University and social service workers to find an amenable and viable upzone.

It is long past time for the city to stop caving to the demands of a small percentage of owners who are only serving in their own economic interests as they work to exacerbate economic evictions and displacement and continued massive transfers of wealth from the have nots to the haves.

Without these upzones, our massive investment in light rail will have been wasted and we will have squandered a massive opportunity to reduce the risk of displacement and economic evictions.

Please approve the upzones.

Choose Public Space!

I whole-heartedly agree that no up-zone should be considered by the City in the University District until an appropriate site (approx. one half acre) is identified for a **central public square** at or directly adjacent to the Brooklyn Station. The construction of the light rail station offers a once-in-a-lifetime opportunity for Seattle to make an enormous impact on the future of the built environment in the heart of the U-District. A central public square, at or directly adjacent to the light rail station, would provide multiple attributes for the City and for the U-District community:

1. A **pedestrian surge space** (like a large lobby) for the estimated 20,000+ projected daily light rail users at the Brooklyn Station
2. An **open relief space** to help keep preserve light, openness, and trees in an area slated to receive increased building density,
and which is already substantially below City guidelines for public open space!
3. A **community cultural venue** that can accommodate multiple community-oriented functions (daily farmers' markets, art shows
and displays, musical performances, product and cultural exhibits, community celebrations and demonstrations that don't
require street closures, or just people-watching, etc.)
4. An **identifying focal point** to the U-District that will serve as an organizational feature and help encourage community
"ownership" for the area. (And so that when you go there,
there IS a "there"!
5. An **iconic feature site** for a large sculpture, or a fountain, that would help put the U-District "on the map".

This opportunity to do the right thing for many future generations of citizens of the University District, as well as for Seattle in general, will never come again! Let's make sure that the up-zone windfall for property owners is a win-win-win including the U-District Community and its commuters and the University of Washington.

my perspective: I got to know the U District as a student, and have seen many changes over the more than thirty years that I have worked in the neighborhood. I am a long time resident of Fremont, and Metro is my exclusive means of commuting to the U District.

first, I am very supportive of increased density around the new light rail station on Brooklyn, and excited for the improved transportation options. No particular comments about proposed heights, other than interest and concern around design guidelines and design standards, so that high rise development contributes to a more livable, but still navigable neighborhood environment.

The notion of the unique "character" of the District is a moving target. The nature and feel of the place now-- in many areas run down, seedy, grungy and sometimes unsafe-- is not what it was when the Ave was a haven for hippies. forty years ago, there was still a mix of strong, vibrant retail of all kinds, side by side with the counter-culture. Clearly not the District of today which frankly in many areas needs to be cleaned up.

So a "character" for the future, draw on the presence of the UW, where "discovery is at the heart of our University." Build on the new theme of innovation, while growing both the entrepreneurial spirit coupled with a priority for sustainability. That may shape a vision for the District's character that will renew it in many ways.

Before getting to my main points about transportation, I want emphasize that keeping affordable housing, especially in the "West Edge" needs to be a priority. No idea or suggestions on how to do that through zoning or design requirements. but perhaps it can be coupled with the theme of discovery/innovation/sustainability, with the City to provide flexibility, if not outright incentives, for development of pilot projects that deliver affordable housing in new ways. what might be possible for manufactured modules, that can be stacked-- or spaces designed for both personal space and shared living quarters-- but not more apodments, please.

Transportation - this is what I want to emphasize. The zoning proposal will definitely increase density if enacted, but does not address how all those new residents are going to get around. For the City to proceed with the zoning plan without concurrently addressing transportation planning and investments will make a bad situation intolerable. some thoughts about this:

1. significantly better coordination and planning of transportation services among the key players of Metro, Sound Transit, and the City at the table and taking responsibility. I have heard people say they would like to see a true transit hub that brings all the modes together, rather than two light rail stations with major bus lines several to many blocks away.
2. assess if more one way streets in the area south of 45th at least, and perhaps south of 50th, would improve flow. Roosevelt and 11th are already paired one ways-- let's add 12th and Brooklyn too.
3. my favorite "one way" proposal is for the Ave. Make it one way, and one lane, southbound. then widen the sidewalks, add plenty of pedestrian amenities, trees and plantings, and make the Ave a great place to stroll, sit, and enjoy the vibrancy of the neighborhood.

Over the last couple of years at various public forums, there has been discussion of Portland's Pearl District as an example of renewing an older neighborhood. A mix of reuse for some old structures, interspersed with much higher rise buildings, I visited there last year, and it truly is an urban neighborhood that I think would be a great place to live and work. It was that visit that made me think of more one way streets-- and they also make good use of mid-block pass throughs to great effect.

Since moving north from its original downtown location in 1895, the University of Washington has been proud to call what is now known as the University District home. We believe this to be one of Seattle's best neighborhoods and we believe we help make it so. For more than 100 years, UW's students, staff

and faculty have lived and worked in the U District. They have fueled retail, restaurant and entertainment activity; started businesses; and provided services to neighbors in need. They have created art. They have protested, paraded, and loved the U District they call home.

Over the past several years, the UW has partnered through the University District Partnership and other venues with residents, business and property owners, social service providers, open space advocates and City staff to build a common vision for the future of the U District. UW has partnered with neighbors in seeking a U District that is a neighborhood of choice for great and affordable housing, and new businesses and those looking to expand. The UW and its neighbors recognize that the U District needs to be safe, be a true mobility hub, and contain great public spaces, including vibrant alleyways and historic and character-defining buildings. That common vision is set out in the U District Urban Design Framework (2013) and, for the most part, it is reflected in the draft U District Urban Design rezone proposal.

The work of building a vision for the U District has now spanned several years and we are happy to see progress. With anticipation of light rail opening in the District in 2021, new development is already remaking parts of the neighborhood, highlighting the need for new zoning and development standards that shape new development appropriately to yield the benefits required in an urban center and desired in the U District.

The UW supports the overall approach of the proposed rezone: supporting job and housing growth through increased height and density in the core of the U District; applying development standards to preserve variety, scale and transitions; and utilizing new requirements and incentives to the yield elements of a great neighborhood that the private market would not otherwise provide, like affordable housing, open space, childcare, green streets, and historic preservation. We share the overarching goal of a U District that is a vital, attractive urban district affordable to all, with services and amenities required for a leading urban center of the Pacific Northwest.

However, we find inconsistencies between the stated goals of the rezone proposal and the draft development standards. In particular, the City's stated goal, shared by the UW and other partners, is a jobs-housing balance appropriate for an urban center. We believe the current form of the draft

development standards will fall short in supporting the development of a market-responsive office space product. Without a stronger commitment to creating such office space, the proposed rezone may result in an imbalance at the expense of job growth and job base diversity.

Take the future U-District Station Site as an example. While the UW is exploring housing options for faculty, staff and other residents elsewhere in the U District, the Station Site owned by UW has been identified for development as administrative office, classroom, and / or innovation space. Successful development of the Station Site will bring more jobs to the U District, and those jobs would best be served by the proximity to light rail. Yet, the Station Site presents several site-specific development challenges not fully addressed in the draft proposal. Those challenges must be resolved for the development to proceed and jobs to be created. We have outlined those challenges in the attached document and hope they can be taken into account in the final rezone proposal. Although the Station Site presents some unique challenges under the proposed code changes, some of the same development challenges will also be faced by developers on more traditional sites.

In particular, we'd like to highlight one critical development challenge with the Station Site that is common to many sites: floor plate size for non-residential development. The proposed maximum height for the Station Site is 320 feet with a maximum non-residential FAR of 7. As City staff have acknowledged, however, there is no way to reach a height of 320 feet and the maximum FAR with an office building due to the significant floor plate constraints in the draft development standards. Under the draft legislation, non-residential floor plate size is restricted to 20,000 SF average for standard office uses, and 24,000 SF average for research and development uses in buildings up to 160 feet tall. For buildings between 160 feet and 240 feet tall, the floor plate size becomes more restrictive, allowing just 10,500 SF average for *all* floors above the podium. For buildings taller than 240 feet, the floor plate size is just 9,500 SF average for *all* floors above the podium. If the City's intention is truly to meet the goals of providing a job-housing balance, then it should allow greater floor plate sizes. Greater floor plate size will not only make commercial development more feasible, but it will provide increased affordable housing mitigation fees to help meet the City's affordable housing goals.

We'd like to thank you and the other OPCD staff for your work so far and ongoing willingness to engage on this proposal. We hope you will take our comments into account. UW is committed to work with you and community partners to ensure the final legislation is right for the future of the U District.

Station Site and Adjacent Property Challenges

A. Introduction and Background

The University of Washington owns the air rights above the future University District light rail station (the "Station Site"). The Station Site is approximately 360 feet long in the north/south direction and approximately 103 feet wide in the east/west direction, with a total area of approximately 37,061 square feet. The Station Site is bounded by Brooklyn Avenue NE to the west, the landmarked Neptune Theater to the north, an alley to the east, and 43rd Street to the south.

Consistent with the City and the community's goals for promoting transit-oriented development in the U District, the UW is considering future development of the Station Site with a non-residential tower, one that would accommodate offices, classrooms, and/or research facilities and innovation spaces. This development will help grow and diversify jobs in the District. However, there are a number of unique issues with a tower project on the Site based on the likely needs of future users and the location of the light rail station's "head houses," which will take up significant ground floor area. The draft legislation proposed by the City does not allow for sufficient usable development capacity or flexibility to navigate these issues well. To provide more flexibility and better outcomes, the legislation should be revised consistent with the recommendations below.

B. Station Site Development Challenges Presented by the Draft Ordinance

1. Floor Plate Size:

The draft legislation restricts floor plate sizes above 55 feet on the Station Site. For floorplates that are above 55 feet in a structure only 160 feet tall, the maximum size of a single floorplate is 24,000 square feet, but the average size is restricted to 20,000 square feet for general non-residential uses. That average size is too small to efficiently and cost effectively accommodate the office, classroom, and potential research facilities and innovation spaces the University hopes to locate on the Station Site. It would also not allow the UW to come close to maximizing FAR on the site, which means that UW will not be able to develop its limited land resources in the most efficient manner. Taking into account the surrounding urban environment of the Station Site and the opportunity for transit-oriented development the site presents, the average floorplate size allowed should be increased to at least 24,000 square feet for all non-residential uses and that floor plate should be allowed in buildings taller than 160 feet.

Although the draft legislation allows buildings up to 160 feet tall that contain research and development lab uses to have an average floor plate size of 24,000 square feet, that development standard does not provide the flexibility the University needs to develop the Site.

The University may locate research and development labs in the future development, but it may also locate other uses. In order to meet its mission, the University needs flexibility in the uses of the space; it should not be constrained by the required use of the space when the needs of the University may change over time. All non-residential uses should be allowed to have average floorplates of at least 24,000 square feet.

2. Open Space:

The draft legislation requires open space to be provided in association with developments on lots that are more than 30,000 square feet. The open space provided must equal 15% of the lot area. For the Station Site, that means providing approximately 5,660 square feet of open space. Given the substantial portion of the Site that will be taken up by the station's "head houses," it is not feasible to provide open space, as traditionally defined, on the Site. The University appreciates that the draft legislation would allow provision of this space off-site (and contemplates development of the former IHOP site at the corner of 43rd and Brooklyn as a plaza if the Station Site is developed). However, other issues remain. The draft legislation should be revised as follows to provide flexible opportunities to meet the open space requirements on the Station Site:

- a. Allow interior, enclosed, ground-level space that is designed as an amenity connected with the public realm and functional as a public room (for example a galleria for circulation and events), and including food retail, to qualify as on-site open space when associated with a regional transit hub.
- b. Consider any off-site open space provided eligible to also count as neighborhood open space amenity to gain extra floor area, or eligible for open space TDR status to gain extra floor area. Provision of on-site open space is an eligible incentive for gaining extra floor area, so off-site open space should be given similar consideration on sites that are space-constrained due to light rail stations or because they provide other public benefits.

3. Parking and Loading Requirements:

UW has not begun project design and has not decided whether or not to include a small amount of visitor parking. While in the end the building may not have parking, if the decision is made to include parking there are a number of issues with the parking requirements in the draft legislation with respect to the Station Site. They are as follows:

- a. *Above Grade Parking Location and Separation.* The draft legislation allows parking above grade if it is separated from street frontages by other uses, or, on small lots (30,000 square feet in size or 103 feet in depth or less) in 2:1 proportion to below grade stories, as long as the parking is separated by other uses on at least 30 percent of each street frontage and is otherwise screened. Due to the narrow depth of the Station Site, the small lot requirements would apply to it. However, it is likely not possible to locate parking below grade due to the light rail station, so above-grade parking on the Station Site should be allowed regardless of whether

below-grade parking exists to provide the basis for the 2:1 ratio. Additionally, because of the narrow site depth, above-grade parking on the Station Site should be allowed to be screened by architectural screening, rather than by other uses.

b. *Above Grade Parking Exemption from Chargeable Floor Area.* Below grade parking is not considered chargeable floor area, but above-grade parking could be considered chargeable. Development on the Station Site should not receive a FAR penalty because it cannot locate visitor parking underground. Any parking allowed to be provided above grade on the Station Site should be exempt from FAR limits.

c. *Loading Dock Requirements.* Meeting standard loading dock requirements on the Station Site will be a challenge due to the location of the “head houses” and the narrow depth of the site. The Station Site should be exempt from typical loading dock positioning and design requirements, and flexible solutions to providing loading capacity should be allowed.

4. Transparency Requirements:

The draft legislation generally requires 60 percent of the street facing facades on Brooklyn and 43rd to be transparent. On the Station Site, portions of the ground level will be taken up by the station’s “head houses,” which are open pedestrian areas. Those areas should count toward the transparency requirements for each length of the site.

5. Green Street Improvements:

As the draft legislation proposes to designate both 43rd and Brooklyn neighborhood green streets, the University may be interested in implementing green street improvements to provide neighborhood amenities and help gain extra floor area for the development. As such area must be landscaped in accordance with an adopted green street concept plan, we hope the City will finalize its draft Director’s Rule 13-2015 along with the final legislation.

C. Building Separation

The University of Washington also has concerns with the proposed building separation requirements. The requirements may prevent tower development on certain sites, further undermining the growth and job-housing balance desired for the U District.

1. The Process To Obtain Reductions in Building Separation Should Be Revised

The draft code says that the Director may allow as a “special exception” and “Type I decision” reduced building separation if certain criteria are met. Currently, the land use code lists “special exceptions” as Type II decisions, not Type I decisions. The special exception language should be removed from the draft code to clarify the intended process for obtaining a reduction in building separation.

Some of the factors the Director must consider when granting the reduction should also be revised or deleted. Factor 1 should protect the public realm, not private rights. Further, Factor 2 should be clarified to specifically allow consideration of off-site public benefits. Additionally, the code should clarify that the reduction may be granted for buildings that are held under common ownership but located on different lots.

Last, the potential for a reduction in separation should be expanded. Removing or revising the threshold criteria will allow more flexibility and better design outcomes leading to a quality and varied built environment.

2. The Code Should Treat Simultaneous Projects Equally

The code should require equal separation requirements for adjacent projects under different ownership when they are proceeding through the permit process simultaneously. To be considered simultaneous projects, the later project could be required to submit a complete design guidance application prior to the date on which the first project would be required to submit their master use permit application in order to be vested.

We commend the work of OPCD in recognizing that substantial growth is coming to the University District in the next twenty years, and that zoning changes must be made to accommodate that growth, and we commend the decisions of the Council, the Mayor and OPCD to create mitigations in the form of additional affordable housing through the Mandatory Housing Affordability programs. However, the scale of the proposed mitigations for affordable housing and childcare are inadequate given that the new development will create thousands of new low-wage service sector jobs, and thus increased pressure on existing affordable housing and child care. We find that there are thus substantial negative impacts from the proposed growth for low-wage workers and families currently working and living in the University District. Would the city allow development without adequate sewage treatment or water supply? Why would it allow stepped-up commercial development without adequate affordable housing and child care?

There is no question that the proposed set of upzones will greatly increase the value and therefore the price of real estate in the University District. This, in turn, will increase the cost of rental housing and space for critical services for low-wage workers, such as child care.

This upzone would be less problematic if wages for low-wage workers were keeping even with likely rent increases and child care cost increases as currently affordable housing and small commercial space is replaced by new market rate construction. But low-wage workers in the University District are seeing small if any wage increases (insert what UW rank and file workers are getting in terms of wages) other than the City's mandated minimum wage increases for the very poorest workers. Here are comments on specific provisions of the proposal:

Affordable Housing

There is already a shortage of affordable housing in the University District and people are rent burdened. 90% of the housing units in the University District are rentals, and approximately 66% of University District residents are housing burdened (meaning they are paying more than 30% of their income for housing). This compares to 50% of units in the city being rentals and 47% being housing burdened.

Approximately 46% of residents in the University District are people of color, and the population increased more than 15% from 1990-2010, one of the fastest growth rates for people of color in the city. The primary residents of the University District are also University of Washington faculty, staff and students.¹

Multiple publications commissioned by the City of Seattle and the University of Washington predict rents climbing as much as 20% as a result of the upzone.²

Thousands of low-wage workers at the university and other employers live in the University District, and over 40% of residents live at under 200% of the Federal Poverty Level.³ While the report states that only 50+/- housing units would likely be demolished in the near term (not defined), and less than 275 units in the long-term, other estimates place the long-term number at over 1,000 units. The report estimates that the MHA-C and MHA-R programs will generate between 439 and 745 units of affordable housing over the next 20 years. This represents between 9 and 14% of the up to 5,000 total new units that the report predicts in the area. Many low wage UW workers will be displaced.

Moreover, some of the new affordable units may not even be located in the U District under the most likely payment-in-lieu scenario, forcing workers to move to distant parts of the city or beyond. Even at 60% of average median household income, they will still not be affordable for low-wage workers working part-time, a common employer practice, or accessible for groups of unrelated young workers, who live together to share rent costs. Finally, as one indicator of need, the Seattle Housing Authority waiting list for affordable units ranges for 1 to 14 years, depending on the size and location of the units. The report makes no estimate of what will happen to rents in currently affordable housing with the upzone, and it is clear that the new market-rate construction will not be affordable to low-wage workers.

Accessible Child Care

The City of Seattle already has some of the more expensive child care costs in the country, with the average cost of full-time infant care at \$17,300 a year. Part of this cost is due to the major shortage of child care in the city and the cost of operating small child care centers.

The existing child care mitigation program which will be applied in the U District upzone is the Incentive Zoning Program. From 2010 to 2016, with all the building going on in Seattle, this program has yielded \$8.6 million in fees for the construction of new childcare facilities, which sounds like a lot, but which translates to space for roughly 800-900 young children, **not** counting operating costs. The majority of the money raised in this program was not spent for many years and the city has only recently started to distribute it.

According to the 2014 **Seattle Preschool for All Initiative** report, there were at least 3,600 three and four year olds in Seattle who **are not enrolled** in any sort of formal preschool or child care program, not

¹ See Heartland LLC. "City of Seattle DPD, U-District Urban Design Framework Support Analysis Memo." 2015.

² For example, see Heartland LLC. "City of Seattle DPD, U-District Urban Design Framework Support Analysis Memo." 2015. Pg 3

³ City of Seattle Office of Planning and Development. "U District Urban Design Draft Recommendations: zoning, development standards, affordable housing requirements, and amenities. 05/2016

to mention the thousands of families with children in programs who are having to choose paying for child care or other necessities. Unfortunately, Seattle can't build its way out of its child care crisis through this program as the numbers show. Instead, the city needs to develop a better child care mitigation program for new development that is based on child care subsidies to low-wage working families. The current incentive zoning child care formula is based on 2001 Nexus study, is out of date and has not been fully adjusted for inflation.

As we argued above, the new commercial construction will replace less expensive commercial space, making it even harder for family and center child care providers to afford space even if low-wage families could afford the tuition.

Transit Access

University of Washington faculty, students and staff are already burdened by high transit costs. 29% of UW's staff and 35% of faculty use UW's subsidized "U-Pass" mass transit program. U-Pass costs per user have more than tripled in the last twelve years, to \$150 per academic quarter. It is already one of the most expensive employer-provided transportation programs in the city. Recently, a coalition of UW faculty, unions and student groups prevented the university from introducing a 43% price hike to cover back taxes owed to the City of Seattle, and increased ridership projections from the new Husky Stadium light rail station. Displacing University District residents without a thorough and more effectively subsidized transit program will only increase their cost burden more.

TOD Planning and Racial Justice

In spite of the fact that the Race and Social Justice Initiative has been in law in Seattle since 2009, OPCD does not appear to be applying a racial justice framework in its urban design planning, except possibly where community organizations have provided leadership in South Seattle. This problem was studied extensively in the Puget Sound Sage 2012 report, *Transit Oriented Development That's Healthy, Green and Just*, and we quote from that report:

Existing TOD Tools Fall Short of Racial Equity

Market-based and conventional TOD planning ignores job quality.

- *Most guidelines for TOD focus on building quality places for people to live in and not on ensuring quality jobs for people to work at.*
- *TOD planning that mentions equity tends to focus only on affordable housing, not critical services like child care and transit.*
- *Few local governments make job quality an element of "livability".*
- *In transit areas, low-wage service sector jobs are growing faster than living wage jobs.*

TOD planning does not prioritize the needs of communities and families of color.

- *New TOD projects cater primarily to upper-income tenants with families of one to three people.*
- *The importance of race in understanding and providing communities roots often goes unaddressed in planning and development.*

As the City and Sound Transit invests millions in new light rail service and infrastructure improvements to the U District, and as the City considers options for up-zoning huge swaths of U District property, we should be asking—will the advantages of living near a new light rail station be shared by households of all incomes and people of all races and ethnicities? By seeking a racial justice framework in the U District and future upzones, we can help break the cycle of disenfranchisement and institutional barriers to prosperity.

In summary, if proposed mitigations in the Urban Design proposal are not adequate to meet unmet needs for child care, affordable housing and transportation access, and there is evidence that the upzone will worsen racial equity, then the City needs to study stronger mitigation strategies, consider phasing in the additional growth over time to create a better match of capacities to meet the needs for affordable housing, childcare and transportation access for all residents, current and future.

Current Affordability & Livability

For many decades the U District has been an affordable area not only for students and UW staff, but also for long time residents, seniors and others. Low rents for many small businesses also provide a diversity of inexpensive ways for residents, students, and workers to eat, drink, socialize, and shop.

Drastic U District Changes & Its Impacts

The UW plans, in cooperation with developers and City of Seattle staff, to upzone (allow larger buildings) in the District. It will allow building heights up to 320' and create a high-tech Innovation District that will bring in multiple, expensive high-rise office towers in the heart of the District's current residential neighborhood. This will destroy current U District benefits and create the following problems:

- Directly eliminate about 500 low-income units.
- Increase land values that will eliminate the affordability of another 1,000 units and increase property taxes.
- Force the current small businesses out of their storefronts because of increased rents from higher land values.
- Increase traffic, while *reducing* the amount of parking.
- Change the neighborhood from a community of residents and small shops to an expansion of the UW campus and UW and corporate office buildings.
- Will strain already over-stressed public services & infrastructure.

First Things First

The upzones will significantly increase problems that already exist in the U District, such as unmanageable traffic congestion, a lack of parking, lack of open space, loss of tree canopy, and loss of existing affordable housing and historic buildings. Including planned and permitted projects on the City's website, the U District exceeds 130% of its Cityassigned growth target for 2024 and Seattle should address the current problems and put First Things First.

Follow the Money

The main promoters of the upzones are those who will benefit financially from them: the UW, U District property owners on the University District Partnership, City of Seattle, and developers.

Affordability

According to the 2013 Heartland report done for the City: “69% of the total households [in the U District] earn less than \$50,000” and “65% of the apartments were built before 1990,” which are generally the more affordable market rate apartments.

Yet already “a new group of higher end market developments are being developed in the U District” and the City, UW, developers, etc. are pushing for high-tech, research or medical highrises significantly higher than South Lake Union and residential highrises that one local developer said salaries would “need to be at least 80k to afford.” In short, U District rents would skyrocket, not be more affordable.

Density

While it may not appear so, Seattle is already quite densely populated. Seattle is the 10th densest city and will soon overtake Los Angeles in density. The U District is already past its 2024 targets, which, according to previous Comprehensive Plans, means the District should reduce development, not increase it.

Open Space

While most in the community want more open space and tree canopy to create a more livable U District, those who want highrise buildings and a high-tech hub want something different. Scott Soules, who owns buildings/land where open space has been proposed, says “... urban public parks and spaces in Seattle are centers for crime and anti-social behavior” The Urban Land Institute report recommends that the “open space” be *inside* with the retail shops in the tower over the light rail station—and others supporting the highrise towers consider open space to be tiny parklets and/or private property with green space on it that’s not accessible after business hours.

Parking

The City’s target growth in the U District is 2,000 people through 2024, which has already been substantially surpassed. With current planned and permitted buildings (all 8 stories or less, i.e., without highrises) exceeding 3,100 units, developers of those units will provide parking for less than half that. Those 1,600 fewer parking spaces than units is more than the street parking in the entire U District core. This only increases both community traffic congestion and individual parking aggravation.

On behalf of the Housing Development Consortium Seattle-King County (HDC), thank you for the opportunity to comment on the University District Draft Proposed Zoning Recommendations. When drafting the Final Zoning Recommendations, we urge you to include an increased mandatory affordable housing requirement, which would exceed the standard required by the MHA-R program, or to add affordable housing back to the list of options to achieve the density incentive.

HDC is a nonprofit member organization which represents more than 100 private businesses, nonprofit organizations, and public partners who are working to develop affordable housing in King County and who are dedicated to the vision that all people should be able to live in a safe, healthy, and affordable home in a community of opportunity.

We are happy to see that the Draft Proposed Zoning Recommendations would implement the recommended Mandatory Housing Affordability program in the University District rather than solely relying on voluntary participation. We know that mandatory programs are far more effective in producing affordable homes, and we are pleased to see the City planning to implement this best practice.

That said, we believe the standard MHA-R requirements are insufficient in the case of an upzone of this magnitude. Under the current MHA-R plan, an upzone of a few stories of floor area would be exchanged for a requirement that new residential development include 5-8% affordable units. The mandatory participation requirement should be significantly larger for buildings above 4-5 stories to ensure a consistent and fair trade-off per upzone capacity offered. As proposed, the University District upzone would create significantly more market-rate homes and significantly more private benefit than the typical MHA-R upzone envisioned. As more market-rate homes are produced, proportionally more public benefit should be given and more affordable homes should be produced.

I have participated in this process since the beginning as I am involved with the ownership and/or management of several commercial properties in the affected area. I have been a member, director and/or president of UD business and fraternal groups for many years. I appreciate all of the work that has been done and the guidance that Dave, Susan and Dennis have provided over many, many meetings and other events. I agree with a lot of what has been proposed, but have the following points that I would like considered:

1. Ave Height Limits. The zoning lift on University Way (the "Ave") from 65' to 85' leaves a lot of potential development capacity on the table. Since the idea, as I understand it, of TOD around a light rail station is to increase density, why would the heights go to 240' on either side of that street (south of NE 45th) and not on the Ave? I realize for some there is a fear of towers overpowering the street, but the very checkered pattern of ownership on the Ave, the historical reluctance of Ave property owners to sell or develop, the tower spacing rules that are suggested and the unfavorable economics in the current market for building a high rise residential building in the UD (current rents don't support the increased cost of construction) all mean it is unlikely any such building would be built any time soon.

North of 45th on the Ave, the height limit should go to 85' instead of remaining at 65'. That would add density and would probably be utilized before the high rise zones are.

Zoning is only changed every 30 or more years, so not creating capacity now could be a problem if the economics change in the future. I'm 67 years old and don't have the time or inclination for another multi-year zoning process!

2. Floor Plates. A goal of many is to bring a major employer other than the UW to the neighborhood. Because today's tech office users demand large floor plates, I suggest the maximum size be raised from 20,000sf to 24,000sf. There are only a very, very few properties in the area where such buildings could be built, so why not give a little more capacity? If it made the difference in just one major company coming to the UD, it would be worth it as one high profile company would likely encourage others to come as well.
3. Open Space. A small group has been beating the drum rather incessantly for open space and a public plaza in the middle of the business district. Most of the supporters do not own commercial properties or businesses in the area. One group that fits that description is CUCAC, which has historically opposed most everything the UW is involved in. An overwhelming number

of Ave business and property owners I have talked with do not like the idea. The supporters cite an open space deficit, but the fact that open space calculations do not include the 600+ acre UW campus, that is one block from the business district, is free and open to the public 24/7 and is well maintained and protected (unlike too many public open spaces) is symptomatic of sometimes bewildering City policies. Further, there is a good sized new park planned for the shore of the nearby Montlake Cut which is a much more appealing location for a park. I believe the draft zoning has provided adequate requirements and incentives for open space.

4. Human Services. Like Pioneer Square, the U District is home to a disproportionate number of service agencies. The business district, and some residents, have suffered the consequences of uncivil behavior from many recipients of these services for many years. The failure to the state/county/city to come up with a rational plan to address this issue is vexing. The failure of the mayor, city council, prosecuting attorney and police to hold people accountable for their behavior in public is severely disappointing. Solving this may be beyond to scope of the current topic, but continuing to dump needy people and providers into the area is not a solution.

My grandfather was one of the architects who designed the hotel at 45th and Brooklyn and I live in Wallingford, and frequently walk or drive to the U District for one reason or another so I have both a family and personal interest in the proposed upzone in the U District. In general, I support the concept of upzoning for the University District but I want to caution that it needs to be more carefully done than what seems to be in the present proposal. Certainly it is the prime candidate for a third "downtown" in Seattle but proceeding pell mell will not necessarily yield a good result.

What is most important is that the increased commercial and residential occupancy grows organically, not a bit of this and a bit of that.

You will recall that in the early '70s we did a rezone that resulted in the construction of only one high rise building, the one just south of the playfield on 50th. That one represented "good design". The current proposed zoning does not even require the same level of "good design" - it should. Still, it sucked all the air out of the space and no more followed it. A residential neighborhood needs to grow in concert with demand to ensure a consistent pattern and a supply of local residential services.

Neighborhood services, small shops, will not appear if the new units are all spread out and do not provide enough local population in one place. Fundamentally, rezoning of a large area, such as you've proposed, should be done in stages. I propose that you should begin by recognizing the areas that are coming close to buildout already under their current zoning, primarily the areas in the southwest and central west part of the U District, and leave them alone for now. Then, the areas that are to be upzoned should be divided and upzoned in stages so each will buildout in about seven to ten years. If there is a legal way to do it, you should consider requiring an 80% buildout in each phase before the next ring of zoning change becomes effective. Finally, after the areas that are currently finishing off have run their normal cycle, thirty-five years or so from now, you could come back and upzone them to encourage redevelopment.

Second, it is important that a substantial rezone such as this must recognize the need for concurrency in transportation, open space and K-12 school seats. Right now both NE 45th, Montlake Blvd and the approaches to the University Bridge are a parking lot during rush hour.

Adding the additional commercial and residential population to the area will only contribute more cars to these and nearby streets. You cannot possibly be so foolish as to believe that the new light rail stop in the U District will, by itself, add adequate transportation resources to the neighborhood. Buses are stalled along with the cars. And automated cars will only make it worse, not better. A solution must be found, planned and funded for access from I-5 to the U District and the university before the rezoning becomes effective. The increased population, both workers and residents, will need additional open space at the heart of the district, at least a half block. The residents will bring children with them if your rezoning provides family housing, which will mean an impact on the schools in the vicinity. This must be a consideration and plans must be in place and paid for to meet these needs.

Third, an important element of concurrency when you are adding that much commercial space is adequate housing in the same neighborhood.

Wallingford is already adversely impacted by the spillover of housing demand from the University. You should be able to state that your residential rezone will provide more than enough new units to house the expected workers to be employed in the new commercial space, at the expected range of salary levels of those employees, not just the executives. The City is discussing the need for mandatory provision of units that are affordable for those at less than the median income. It is equally important that the City require (i.e., mandatory) provision of family housing, two and three bedroom units. There must also be adequate external play space for children, in the new buildings, on their lot, or in new, nearby playfields. What we have been seeing in the new apartment units recently is an outsize percentage of studios and one bedroom units. This is counterproductive to the long-term health of the neighborhood. It is like "crack" instead of "vegetables". Eat your vegetables.

You also need to take into consideration the proposed increase in workers and students in the new University of Washington Master Plan. They are proposing a substantial growth in both over the period of the plan. It would be stupidity to assume they will all live in Mill Creek, Lake Stevens and Juanita and take the light rail to the University. They should be able to live in walking distance to the U. You need to add to your count of workers in the new commercial buildings those that will be added at the University.

Wallingford and the other neighborhoods to the north and east around the U District will be heavily impacted by this upzone if you do not do it properly and do not provide concurrency in transportation, open space and K-12 school seats. The needed infrastructure should be coming online at the same time as the upzones become effective. That is the City's responsibility. Don't shirk it. Your responsibility is far more broad than just land use zoning. Don't leave us to deal with your mess.

Finally, you should give careful consideration to the oft-mentioned idea of lidding I-5 between 45th and 50th to provide open space for the more intense residential areas in the northwest side of the U District and the inevitable rezones you will want to do on the east side of Wallingford next to I-5.

Our family has been, and remains, deeply connected to the University District. My parents both graduated from the University of Washington, living in student housing during their education. I, too, graduated from the UW, living in apartments in the neighborhood at the time. Our family business, real estate development and management, has focused its holdings primarily in the U-District, along the northern end of University Way. We have about half a dozen properties scattered along The Ave, some already developed, some still to be developed. My wife and I had maintained an English as a Second Language school at 50th and University for nearly 20 years, and our company's primary office still remains on the Ave. We really get the University District; it's been our home, and much more, for

decades. We've seen The Ave at its best and at its worst. So very much effort has been spent on improving the experience of living and working in this part of Seattle; it would be a shame for that to all be for nothing, or worse.

When we learned that great changes were afoot, we were both excited and concerned. While we are in agreement with the overall plan for the proposed changes, there were a few elements of the plan that we felt lacked a fully thought out approach to address the changes that are coming our way, and to address existing circumstances that could be improved. The opportunities coming to the neighborhood, along with the explosive growth we've seen in the greater Seattle area, are without precedent. But so are the opportunities for the loss of the character that makes this area so special.

The proposed zoning changes for the South end of University Way, as they currently stand, would be disastrous. From the outset, the greatest concern that all participants in the Urban Design Framework process had was the preservation of the vibrant and eclectic nature of University Way NE. This is the beating heart of the U-District, and we stand to lose it all to incorrect planning choices.

Current zoning plans call for a move to 85 feet south of 45th Street and to remain at 65 feet for everything North of that. Planners and developers all recognize that this effectively caps development efforts at the infamous five-over-two level, wherein five floors are built above a couple of decks of post-tensioned concrete. Typically built to maximum FAR, the end result can be seen all over new development in Seattle: Canyons of cubes stretching for hundreds of feet along both sides of the street, with an extraordinarily poor pedestrian experience. A few examples:

Our own University District along 12th near 47th







The North end of Broadway:









The North End of Dexter abutting the new development in the South Lake Union region:







We see this sort of development in many other areas of the city such as Ballard and parts of Capitol Hill. 65, or even 85 feet, without the guidelines to mitigate damage to the pedestrian experience, and with nothing of substance regarding preservation, will scour the Ave of any level of interesting features and remove the human scale of the existing structures. Out of town developers will come in, assemble land, and put these up quickly. They make all too much financial sense, and cost relatively little. And it's already happening.

The suggestion here, at least below 50th on the Ave, would be to allow substantially greater height (at least 240') to encourage taller, more graceful structure with open space between buildings that have a

lower podium at the base. This would mitigate the canyon experience, and slow down growth, as this sort of zoning encourages patience. In the meantime, we need to work with all haste to develop a proper set of development guidelines (the existing guidelines are woefully out of date) that would require elements that truly enhance the pedestrian experience: lots of setbacks, increased public/open space/amenity requirements, lower awnings and soffits, narrow storefronts, modulation of style and materials, etc. Upper Queen Anne has handled new development a little better than the rest of the city, at least in this regard, and we might look to that neighborhood as an example, or at least a starting point.

That being said, we were surprised to see that certain parts of the University District were not addressed in the recommendations. Two key areas should be reconsidered: The North end of University Way, and the North end of Roosevelt. Overlooking the opportunity to add capacity in these locations is short-sighted. Roosevelt between Ravenna and 50th is about as unappealing a stretch of road as we have in Seattle, recalling some of the worst parts of Aurora or Lake City Way. With Rapid Ride poised to connect the University District with South Lake Union, we have an opportunity for healthy, vibrant development, both residential and retail, along that corridor. There are few homes, and absolutely no views, to lose.

The need for additional height along the North end of University Way stems from a different source. We have worked on several developments on these blocks, with plans for more. In every case, we found ourselves hampered by height issues due to the substantial sloping of streets in the East-West direction. The height differential can be as much as 15 to 20 feet from street to alley and reduces the available building envelope, in addition to complicating access for retail and parking. We'd like to see at least 75 feet, and if possible 85 feet, from 50th to Ravenna. Again, minimal loss of homes or view, but an extraordinary opportunity to bring some density and its attendant activity to a part of the District that has suffered of late.

We appreciate your taking the time to review our comments, and hope you will take our recommendations advisement as you work to draft legislation to put before council.

My comment is a simple one, which only touches on the U District's long standing need for a public town center.

The upzone proposal for the University District, in its current form provides a possibility of economic growth for our neighborhood. It creates new opportunities to build workplaces for University and at other research related start ups. It may encourage high rise residential development and a kind of cultured and prosperous local economy that should surround a community of higher education professionals. I want to see this kind of development in the neighborhood where I have spent my entire adult life, living and working, especially if we are careful not to displace the community that is already exists here.

Unfortunately, the particulars of the upzone proposal before us dictate that while it will cause economic growth, it will otherwise not create the positive developments I describe above. The reason is simple. The proposal before us steers almost all of its benefits and its wealth (created by the stroke of a pen) to the private sector only. The potential academic professionals who might become our long sought core of permanent residents may not choose to live here because, outside their front door will

be the kind of squalor that the U District has become so well known for. Or if high rise development does occur here it may be in the form of vertical gated communities. Maybe these residents will have underground passages to the UW campus.

Tech workers may find as little reason to leave their large floor plate universe as did the Safeco U District denizens of the 1980s who worked in what is now the UW tower. They never left the tower. Public as well as private sector development is required if the city is going to develop a local economy which serves our entire community, and which allows our neighborhood to be a cultural resource for the city at large. IN ORDER TO BE A NEIGHBORHOOD OR BE A PLACE, the community must act as conservator for its local public assets, and it must have local public assets worth conserving. For public capital needs, the stroke of the pen method for creating resources to invest can and should be every bit as effective in the public sphere, as it is in the private one.

All suburban development around our state has long required developers to contribute to parks and schools and other public infrastructure. How many subdivisions worth of residents and workers are we adding to the u district population over the next 20 years. Are they supposed to pay for all the additional "amenity" needs they create. Or rather should developers and property owners who essentially receive a grant of free money through the upzone, also help pay the bills.

To me the answer is obvious. Building the public and private sectors of a neighborhood simultaneously creates value for both private investors and the community at large. Steering all the development "land grant" income to private parties, creates more of the kind of University District we have now. This upzone should wait until we figure out the solutions for generating greater public investment. More economic activity of the hard edged and unkempt variety that we have now is not necessarily what we want to see.

Growth is inevitable. We live in one of the most attractive cities in the world where the pressure to develop is intense. The challenge is to balance this growth with continued livability for those who live here now and for those who will join us.

Our group, the U District Advocates, supports greater densities to accommodate Seattle's growth as long as we can grow responsibly, equitably, and sustainably. We believe that a central public space is an essential piece of the future University District, which currently has a 5 acre (2 city blocks) deficit of open space.

From decades of coordinated outreach, our community has consistently set the 'highest priority' for open space as a central town square in the heart of the district, near the pending light rail station. We have collected thousands of votes for such a space over the past 5 years.

While we greatly appreciate the proposed incentives for open space in the draft rezone proposal, offered to property owners and developers that might result in the creation of distributed public open space, by themselves, they are insufficient as a guarantee to realize a central town square, the community's highest priority.

Furthermore, Seattle's Comprehensive Plan sets guidelines for our urban village 'open space' at one acre per thousand households and one acre per ten thousand jobs, and at least ten thousand square feet in size.

The consensus is that we must first identify an appropriate site, then implement a funding strategy to develop this community asset, and finally identify an entity to maintain and manage it. Our nascent business improvement area (BIA) may take on the third responsibility as our neighborhood is already taxing ourselves locally to supplement the services that the city cannot provide. To achieve the first two responsibilities, we need the kind of coordinated leadership that only the City can deliver, when we are being asked to take a bigger share of the city's growth targets.

We welcome the opportunity to collaborate on achieving our shared goals and recognize that a rezone is our best opportunity to create a dense, livable environment for all, in exchange for substantially-taller buildings. We suggest the following potential approaches:

- 1) Prioritize the Bonus Floor Area Incentives: Weight the incentives value by the community's priorities where a central open space delivers greater incentive value to willing developments, especially on adjacent parcels.
- 2) Impact Fees: Implement the kind of development impact fees that are used quite successfully in Bellevue and elsewhere in our state.
- 3) Land Bank: Allow the Parks Department to receive property offered from development incentives and 'land bank' it for use as open space, selling, or swapping it.
- 4) Pedestrian Boulevards: Change the identified festival streets, adjacent to the light rail station to pedestrian-only boulevards that may connect to smaller public open spaces.
- 5) Eminent Domain: Consider the condemnation of select parcels and the threat of eminent domain, as used to bring about the Ballard Commons.

What happens in our district may set a precedent for future neighborhoods so we should do our best to get it right. A revision of the draft re zone proposal is necessary to achieve these goals.

The Roosevelt Neighbors' Alliance (RNA) has worked with Dave LaClergue for the past several years starting with the U District Livability Partnership, where we've voiced our opinions and seen some of our input worked into the current proposal. For this we are grateful and supportive of the plan. These RNA positions include the following:

1. Favor a condensed area of upzone over a more sprawling upzone area. Favor very tall height limits in the center of the urban core. The proposal does both of these. RNA's rationale is to preserve existing older buildings on the periphery, both apartments and bungalows. They're more affordable. The U District deserves to have more variety than block after block of 5-over-1 buildings. We aspire to see

more residential condominiums of the steel and concrete variety in the future that are truly livable because they offer significant noise isolation from neighbors - something vitally important to long term living in a dense urban environment.

2. Preserve the existing single family zoning. The proposal does this. Many of us live in and cherish these older buildings. Many single family houses house more people than one might think. They are generally affordable and appealing. They are ingrained in the neighborhood's historic character.

3. Enhance walkability. Favor durable materials like brick be used in the lower section of new buildings and that landscaping soften the hardscape. Design guidelines address this in specific areas. Much thought went into limiting development potential on the Ave in order to protect its unique eclectic character, and on this front, the proposal succeeds.

However, shortcomings exist.

Design guidelines focus on the key corridors of Brooklyn Ave NE and NE 43rd St near the light rail station and several key intersections. It would be great for new developments throughout the district to leverage design guidelines.

Lack of maintenance continues to be a detriment to walkability, and this is not addressed by the upzone proposal. Presumably new larger buildings have the budget to maintain their exterior, and so indirectly the proposal addresses this goal where the neighborhood sees significant new buildings. Zoning does not generally address maintenance needs. But what this points to is the need for greater enforcement of city codes, whether it's public safety, noise ordinance violations, overgrown vegetation, obstructed sidewalks, trash dumping. The city should be budgeting more money in these areas to help maintain safety and civility and orderliness in the face of increased density.

4. Create new housing that is suitable for families. We need greater incentives for multi-bedroom units. Anecdotally, most new multi-family residential construction is tailored toward smaller one bedroom and studio units. Families cannot live in these units. I suspect this is the result of market forces at play with lots of outside money trying to beat the market by catering to student housing needs. Smaller units bring in more rent per square foot. I see this as a shortcoming to the proposal.

5. Favor new housing that is suitable for all ages and incomes. Healthy neighborhoods need a mixture of residents of all ages and all income brackets.

At the lower end of the market, we see limited affordable housing. The Upzone proposal does not particularly address affordability. HALA intends to address this. Numerous non-profits continue to make meager strides here.

At the upper end of the market, I wonder if the city can help catalyze development of a steel and concrete condo tower in the U District. Something more than market potential is needed to overcome the two things that inhibit condo development - reluctance to finance a project for which no comparable buildings exist nearby, and the ongoing liability risks that condo developers face. We risk losing our aging residents to condos in other neighborhoods.

6. Increase the number of long-term residents and businesses. Good things happen when people are vested in their neighborhood for the long term. Redevelopment in general is good here. Many parcels in the U District need to be reimagined. commercial and residential space across the price

spectrum. Increasing supply with new development is one part of this, but it tends to be expensive, and it can replace the affordable. We want a neighborhood where our service workers and young people can live and work, not just our professionals, and where our retired can retire, and where unique locally-owned store fronts can remain open and new small businesses can rent a commercial space and not be overburdened by rent. Again, it succeeds in limiting the upzone sprawl to preserve older buildings outside the core and their more affordable rents. It's not perfect. Rents will certainly force some out. Hopefully many of those who wish to stay in the hood are able to.

Affordable commercial spaces are a necessity.

7. Open space is not a want, it's a need. The upzone proposal has incentives for open space within the boundaries of a new development, and some of this can be shared with the public. This is great. I fear greater incentives are needed to see real amenities created here. For all the talk about the need for open space, the City need to consider bigger tools to guarantee that specific open space parcels be added to the upzone legislation. It will not be easy, nor will it ever be easier.

8. Avoid a tragedy of the commons. Each development acting in its own best interest will not provide the public amenities needed to transition the U District into a great livable neighborhood. I generally propose greater incentives for these amenities.

I am writing to share my thoughts and concerns about the future plans of the University District.

I grew up in the U. District, spent my 20's living in an apartment on The Ave, and now have returned to raise my two sons in the neighborhood. I am lifelong stakeholder, and hold a keen interest in its future.

My points of concern are ***New Public Square above the Light Rail Station, Building Height on The Ave, Neighborhood Economy, Exterior Design of New Buildings, Neighborhood Density & Historic Preservation, and New Height Limits on 12th Ave & 50th.***

New Public Square above the Light Rail Station

A public square has the potential to be a highlight and heart of the neighborhood. It should accommodate performances, a fountain & other public art, and seating. Along the borders should be street level business that attract foot traffic. Above, apartments, to 'have eyes' on the square 24/7. Outdoor seating at cafes and restaurants would also be ideal.

[Jackson Square](#) in New Orleans offers space for artists to sell their paintings. This brings in rotating art and a social aspect to the square. This square should also offer artist spots. And, as this is the *University District*, there should be a number of discounted spots offered to artists under the age of 25.

Where should it be? There is a valid concern that if it were a part of The Ave, that it would create a 'dead zone' for pedestrians walking down the street. Therefore, N.E. 43rd St should simply be closed down and designed to be a welcoming connection between The Ave and the square. This will also help with

the pedestrian traffic flow heading to the University, in addition to maintaining the steady stream of businesses on The Ave.

Building Height on The Ave

During the "Walk with the Mayor" last year, I spoke with a city staffer who explained that the new height limits for The Ave are higher than the-rule-of-thumb for a street of that width, especially on the 4200 and 4300 blocks.

- The Ave is a skinny two-lane road. Buildings that are too high would create a canyon effect, and perhaps all-day shade.
- Towering buildings do not create a pedestrian friendly experience. The Ave is the pedestrian downtown of the neighborhood. It's important to all stakeholders (business owners, patrons, UW students, UW Alumni [AKA Donors], etc.), present and future, that the The Ave evokes a charming and interesting experience. 'Charming and interesting', in part, are created through buildings appropriate in size (short) and through an eclectic mix of independent shops and restaurants.

No one will foster affection for a street with oddly tall buildings filled with chain stores, which will be the only businesses able to afford new expensive spaces.

- Raise height limits beyond The Ave, if necessary, but keep the main pedestrian business street a friendly height. All the people moving into new towers will enjoy a pleasant neighborhood main-street.

Neighborhood Economy

- Some say that new tall buildings may help with investment on The Ave. I say *parking* will help. A large FREE 2-hour parking garage near The Ave and the new square would be tremendous for The Ave's business. Two hours would give people time to run errands and grab a coffee or bite to eat. Parking is a key factor that draws people to Northgate and U. Village.

Santa Monica offers this (or it did back in 2004), and as a tourist I was thrilled. Not only did we not have to stress about finding street parking, but the FREE component put us in an extra good mood. After the first 2 -hours, the rate was \$1/hr.

If the City is not in the position to build this neighborhood investment, figure out how to have the developers pay for the construction and have the City manage it.

- The Ave has too many restaurants. Diversity would benefit all stakeholders. The City should offer landlords and new businesses a tax incentive to fill vacancies with non-restaurant tenants. Have the developers pay a 'business diversity tax' to make up the funds. It is in their interest to have a well-rounded 'Main-street' in the neighborhood.

- Public Art is an asset to a neighborhood. Developers should pay a 'public art' tax to infuse the neighborhood with a creative spirit.

Exterior Design of New Buildings

Again, charm is an asset for the neighborhood. Therefore, requirements should be set for the exterior aesthetic of any new buildings. This concept has been successful with [San Francisco's bay windows](#), for example. The current trend in Seattle's modern/post modern (?) colorful architecture may be pleasing today, but it will likely become dated. We don't want an entire neighborhood to be 'oh-so 20-teen & 2020s'. [Here](#) is a local building that must have been deemed 'so cool' when it was built.

- **Recommended requirements:**
 - Brick facades, as a nod to the University and its Collegiate Gothic buildings. This is timeless, classy, and will make the neighborhood unique. Local [example #1](#), [example #2](#). Local use of brick in recently constructed buildings: [example #1](#), [example#2](#)
 - interesting roof-lines, especially for any skyscrapers
 - trees and foliage, on at least residential streets

Neighborhood Density & Historic Preservation

Please don't create stress and incentives to tear down the charming 100+ year old buildings in the residential areas. Instead, provide incentives for Mother-in-Law apartments and backyard cottages. It is these old homes that give the neighborhood and the City a sense of history and charm that you can not build with new buildings.

New Height Limits on 12th Ave & 50th

This block already acts as a transition zone from business district to residential. It currently allows three-story townhouses and short apartment houses. It's suggested to go much higher (85'). The current zone is the perfect height for this transition purpose. The thoroughfare of 50th is the natural divider to mark the transition. Anything higher will create an awkward look to the street, as some will eventually 'sell out' and then there will be [extra tall buildings next lovely old homes](#). [Here](#) is another local example.

Some landowners have already [given in to townhouses](#). At least these have 'Craftsman' characteristics and they aren't too tall.

The block just north of this one is not in the suggested up-zone. It also consists of lovely 100+ year old houses. A neighboring block with relatively towering buildings would be jarring and unappealing.

It should also be noted that 12th is a skinny residential street. Cars are not even allowed to park on both sides. Parallel Brooklyn and 11th blocks are in this same suggested up-zone. Although they are wider streets than 12th, my above statements stand for them as well.

Home owners in this area are already regularly harassed via mail to sell, as it is. If the height limits go up, the pressure will also increase.

This is an important moment to take measures to preserve our history.

Here are some additional images of the houses of 12th & 50th. [photo #1](#) [photo #2](#) [photo #3](#). There are actually so many mature trees it's difficult to capture all of the homes.

Here are some images of the houses of 12th & 52nd. [photo #1](#) [photo #2](#) [photo #3](#)

In conclusion, thank you for taking time in designing the character and aesthetic of the University District. Generations of Seattleites, UW students, and tourists will appreciate a thoughtful, charming, pedestrian friendly neighborhood.

The University of Washington Board of Regents has actually proposed that they are in favor of the rat-race creating, disruptive and horribly rent-increasing and traffic-nightmare-producing upzoning plan for the University District as envisioned by the corporate interests who wish to overrun it and have control over it by buying it out. How can they possibly be using the excuse that they want to foster "partnerships" between corporations and the University in order to further their narrow interests in supporting the community destroying upzoning plan as it is. Universities are best preserved and university students are best served by allowing universities to remain academically focused, and not business world focused. There are times when many university students want to get involved in the business world or the corporate world: when they are desiring to do short-term internships during summer breaks and such and when they graduate and are looking for a job (for those who want to get a business or corporate job). To endeavor to meld the University of Washington's academic world and the corporate world into one is to cause much damage to the University's academic world. The ivory tower exists for a reason: to allow for the existence and survival of pure academic study and research. How dare they use the planned mixing of the two to try to justify ruining the character and beauty and strengths of the U-District. You know what? The people who call the University District home don't want that. It doesn't matter how many landowners and property owners who favor a quick and easy buck do. If you poll the residents of the University District, you will find that the overwhelming majority would never want their neighborhood to be sold to the highest bidder; they would want the priceless cultural and intellectual and community character of the smaller and more livable University District preserved for themselves and future generations. Yes, the University District is close to downtown Seattle, and thus, is prime real estate. And yes, it is not yet been driven to its limits in terms of the number of massive, bloated, concrete, impersonal, almost indistinguishable high-rises that can possibly be packed into its boundaries.

There is the beauty, charm, and community spirit; and the artistic, cultural, and intellectual atmosphere of the U-District to consider in the careful weighing of all options for the upzoning of the University District. Like the community of Berkeley, California, in which I lived while attending the UC Berkeley Law School, the University District at this time is a mix of small businesses, university buildings, residential buildings, a few larger business buildings, and of course, the academically outstanding and architecturally beautiful University of Washington. The academic and architectural beauty of the University is a great inspiration to so many of its students. Can you imagine how the character of this

very old, traditional, and noble institution would be tarnished forever if the corporate and growth advocates are allowed to run wild and turn the surrounding areas of this great academic institution into a high-rise infested rat race? That does not bode well for the students and residents of the University District. Character is measured in quality, not quantity; and sometimes, less is better. I am confident when I say that those of us who have attended the University of Washington and have lived in and loved the U-District for many years desire that it should be allowed to retain its excellent character. We do not want highrises full of detached, impersonal, corporate businesses lining the streets, blocking out the sun, increasing traffic and pollution, and making rents too high to afford and traffic and parking even more unbearable. The University of Washington is, after all, a public university; not a private, corporate enterprise. We desire the smaller, more close-knit, slower, more relaxed, breathable, and more sociable community in which we live and work and play. To transform the U-District into an area of Seattle that will resemble the hectic, overly crowded downtown with its towering, gray skyscrapers in every space of every block would be a tragedy for the students of the University of Washington and the non-student residents who call the U-District home.

Home. What a wonderful word. The U-District is such a unique, wonderful neighborhood and community that so many of us residents are grateful to be able to call it home. Perhaps that's why so many wealthy owners of large corporations are so enthusiastic about the idea of planting their skyscrapers here and moving in and calling it home, too. Well, that would only serve to ruin what they and others love about our neighborhood, our community. Please think about the "before" and "after" visions of the U-District when considering the various upzoning plans. It will not be "upzoning" if rich corporations are allowed to ride roughshod over the backs of the current residents of the U-District; it will "smog-zoning," "community-destruction-zoning," "steamroller-zoning," "smother-zoning" and "culture-burying-zoning." There would be nothing left of the wonderful character of the University District that we all appreciate. I recall that as a teenager, I used to hop on a Metro bus and ride to the U-District to go to a movie at one of the theaters here. It was such a magical, exciting trip. I still recall the buskers who played their guitars in front of their open guitar cases on the Ave., and the irresistible aromas wafting out from the different, ethnic restaurants along the Ave. It is still much the same, though a bit more built up. The treasure of a neighborhood that is now our University District with its unique culture and atmosphere would be obliterated if colossal, Godzilla-style growth is allowed to rampage in our streets. The U-District will be squashed. It will be crushed in favor of a "big city feel," high roller, shark tank, dog-eat-dog district. We don't want that for our treasure of a University District that we live in. For the love of people and not money and big business, do not sell out our University District. Please make every human effort to ensure that it remains a university district and not just a real estate trophy bloated with almost indistinguishable, massive, concrete high rises for the wealthiest, corporate business people.

Suggestions regarding U District Comprehensive Plan:

High Rise:

1. Maintain distance between buildings
2. More residence than office space especially where/if removing smaller homes
3. Allow for parking in buildings and not on street
4. Keep buildings as low and slim as possible above 50th

Social Services:

1. All ready plenty in the area especially with Gold House, many churches, and what the new food bank will offer
2. Child care and early education spaces on Roosevelt Way
3. Possibly A large public school space allotted for on Roosevelt Way

Trade offs for size variance/height

1. low income working families or vet families going back to school
2. No other payoffs by/for developers unless it is public green spaces
Like walkways, between building or sidewalk areas

Green space/open space:

1. High priority
2. Public space – could Post Office be moved

Creativity

1. A competition somehow! (anything but Hardy Board)
2. Innovative design – _no dark boxes like what the U of W built on lower Campus Parkway for housing students

Bus routes

1. Be sure the Ave, Burke and West Campus are covered by busses
...also connecting with the new stadium stop
2. Run North end buses down the Ave or 15th at least until light
Rail stations are opened...especially until 2021 when the
Northgate Station is opened.

Note: Please know if you want to discourage traffic you need to plan for more residential buildings than office buildings. There has always been a terrific need for faculty and administrative housing near Campus that will provide for an alive upscale business/restaurant area on the “Ave”.

I am looking at the Draft Rezone Map for the University District that is available online at:

http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2439412.pdf

It seems that the proposed zoning changes should conform to the current parcel boundaries, not the old lot lines from the original University Additions subdivision. In the case of our parcel, _____, the Board of Directors of the Seattle Go Center requests that this land be completely placed in the proposed SMU 85-320 zone. The current Draft Rezone Map leaves a small fraction in the MR zone.

I am the Executive Director of the University YMCA in the University District. I understand that there are many different opinions regarding the rezoning of the district. I understand the apprehension that many

feel about change, including longtime residents. I also understand the importance of density, including the environmental and transportation benefits, and the necessity for planned growth versus uncontrolled sprawl. The University Y is excited to play a part in the revitalization of the University District subsequent to the rezone. In particular, the University family Y intends to build a new full-service YMCA facility with swimming pool, gym, and community gathering space, if the rezoning occurs as proposed. The University family Y currently sits just north of 50th St. on land that is zoned LR-2, so we are a nonconforming use. The rezone to NC3 65 or 75 zoning will allow the Y to increase its square footage of health and wellness, community and social engagement facilities from 16,000 to 60,000 ft.². As part of this project, university family Y intends to include between 15 and 20 units of transitional housing, mental health services, and other services for marginalized populations in the district. This portion of the facility would be on the side abutting residential, allowing us to transition the design to a more residential feel on that portion of the building. This will only be possible through the rezone of the current parcel, on which the current facility is a nonconforming use.

The U District Partnership (UDP) has enjoyed a long and productive relationship with City staff during the development of the *Urban Design Framework* that sets the groundwork for the proposed Rezone. This coincided with the work to prepare the *UDP Strategic Plan* and the formation of the UDP organization. The UDP has been involved in the lengthy process of public involvement described in *Appendix A Summary of Public Meetings* of the Director's Report. Following the release of the draft legislation, the UDP facilitated a number of community meetings to discuss the scope of the amendments. We are grateful for the time that Dave LaClergue, Janet Shull, Susan McLain, and Dennis Meier of OPCD along with Chip Nevins and Emily Alvarado from Parks and the Office of Housing have devoted to helping us better understand the legislation.

Introduction

A majority of the voting UDP Board Members support and endorse the Rezone proposal. Since the Board is comprised of individuals who represent property owners, business owners, service providers, the UW, and residents it is impractical to comment on each and every aspect of this detailed legislation. Therefore, this letter is intended to express the majority position of the UDP while not citing specific comments from parties who will comment on issues regarding how the legislation affects their interests. From our analysis and public comments, several themes have emerged. They are: Open Space, Public Services, Building "Floor plate" Area, Design Review, and Additional Capacity Along the "Ave".

Open Space

First we take issue with characterization of open space as an "amenity" – it is a need. We believe that the quality of life for the community is dependent on the provision of public open space for both socializing and recreation. At present, the U District is already deficient of public open space. The City's Comprehensive Plan goal ([link](#)) for open space (1 acre of open space per every 1,000 households in Urban Villages and 1 acre of open space for every 10,000 jobs in Urban Villages) will become increasingly unattainable as additional housing units are created as a result of this Rezone proposal. The need for public open space is an ongoing issue for this neighborhood and has been memorialized for more than 20 years in the Comprehensive Plan, the University Urban Center Neighborhood Plan, and in the 2015 University District Parks Plan Update to the original 2005 Parks Plan:

“The University District’s open space deficit, according to the Comprehensive Plan, is projected to be 4.9 acres in 2035, with or without zoning changes. This size is equivalent to about two city blocks.”

A bright spot in the proposed “Rezone” regarding the open space deficit is the provision for some dedication of open space in new development to provide public open space. For sites greater than 30,000 square feet in area, a minimum space of 4,500 square feet (0.10 Acre) would be required. Without knowing how many large sites are likely to be developed, it is difficult to imagine that enough of these theoretical public open spaces will be created to meet the deficit of 4.9 acres (213,400 square feet). Further, the existing and proposed zoning requirements for private open space in residential developments will not contribute to offsetting the growing deficiency of public open space.

In the 2005 U District Parks Plan, and reiterated in the 2015 U District Parks Plan Update, the highest priority for our community is a central public open space, or town square. The Seattle Comprehensive Plan calls for a dedicated open space of at least 10,000 square feet in size ([link](#)). The proposed Rezone does not adequately address this established priority with a satisfactory coordination of city departments and the tools at their disposal to realize this goal. It appears that the City does not anticipate implementing either a parks impact fee system or a “fee-in-lieu” zoning provision to secure land to make this goal a reality. We urge OPCD, the Mayor, and City Council to consider these or other tools to raise funds for the acquisition and development of public parks in the University District. Otherwise, the deficit will continue to increase and become even more difficult to reduce.

Public Services

Currently, the U-District is home to 14 human services sites focused primarily on youth and adults experiencing homelessness and poverty. Ten exist largely through temporary and opportune reduced rent provided by church hosts. The expansion of height limits and the commensurate jump in land values may speed redevelopment of these properties as churches seek alternate ways to host their congregations and meet their mission. This redevelopment jeopardizes the lower rent space needed by human services providers. Agencies threatened include: the People’s Harm Reduction Alliance (the nation’s largest needle exchange), ROOTS Young Adult Shelter, The U-District Urban Rest Stop, Elizabeth Gregory Home, and Facing Homelessness.

We agree that gross floor area of “human services” should be exempt from Floor Area Ratio (FAR) limits in the SM-U/R 240 Zones (23.48.620). These are critical to meeting the current and future needs for these non-profit organizations that are lifelines to diverse populations of persons needing assistance. We also believe that the legislation should include more provisions for bonus floor area for human services similar to 23.58A.040 (open space). This would consolidate and amplify the opportunities for new development to either provide space within projects or to pay a “fee in lieu” to fund the provision of such space elsewhere in the District.

Building Floor Plate Area

The proposed limits on commercial floor plate area run counter to the goals for diversified employment in the District. Achieving the desired larger floor plates requires adhering to the City’s narrowly defined Research & Development function, “wet labs.” This should be reconsidered to reflect the U District Partnership’s original strategic plan goal of attracting more, i.e. non-UW, major employers to the U District. It is clear that the current strong trend toward open, collaboration-oriented office and research areas has become the expected standard for commercial, research and academic functions in order to maximize collaborations by locating them on as large a single floor as possible. Limiting the maximum floor plate size is to limit future growth and development by terms that were appropriate several years

ago, but are no longer functional. In order to maximize the opportunity to attract major employers, the maximum floor plate size for commercial office function should be greater than the 10,500 as described in section 23.48.645.

Design Review

While the legislation does not mention design review, we believe that it is critical for new, directive design guidelines to be in place soon after the zoning amendments are adopted. Current design guidelines are inadequate to guide development at the scale described in the proposed Rezone. Establishment of new design guidelines should include increased accountability to satisfy the desired development outcomes for the community. This will ensure that the zoning provisions are correctly implemented “transparently” through a thorough community-based review process. The *Director’s Report* states:

“Neighborhood design guidelines provide qualitative guidance for development during the permitting process. They supplement zoning standards, allowing local design review boards and communities to get involved in reviewing and shaping projects. OPCD is working on an update (of) the U District’s design guidelines to make them more relevant to the different type of development envisioned for the area under the new zoning.”

We urge the Mayor and Council to direct the Office to proceed with this update immediately with our assistance so that the new guidelines are vetted through a community process this year.

Additional Capacity Along the “Ave”

The issue of zoning heights along University Way proves controversial in the community and the UDP Board is no different. In Board debate on the proposed rezone, members reiterated universal support for a healthy, vibrant Ave. Unanimously, people support effective preservation of historic and character buildings. Members, also, recognize that development will change The Ave one way or another over the coming decades. Of great concern is whether The Ave can be a place of eclectic, independent retail and dining. While some members would require a central square be guaranteed first in return for greater height along The Ave, others believe now is the time to establish zoning with the greatest possibility of yielding good design and future open space.

By a split vote a UDP majority supports a maximum building height of 85 feet north of 45th St., and a maximum of 160 feet south of 45th St.