

# Seattle Pacific University

## **Major Institution Master Plan (MIMP) Preliminary Draft EIS**

**May 31, 2023**

# DAC Comments on the Prelim Draft EIS

3.5	<b>Height, Bulk, and Scale</b> - The increase of height limits, as well as the added potential for development sites that are larger than the prevailing pattern of the surrounding neighborhood, may result in adverse height, bulk, and scale impacts between areas of less intensive zoning and more intensive zoning.	
	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
1.	Analyze the impacts of orienting development on W. Nickerson St. toward the South Ship Canal Trail.	The CAC has not seen any analysis of this in the PDEIS but expects that the impacts will be addressed in the DEIS.
<p><u>Response:</u> Design Guidelines included in the Draft MIMP for <u>A. Site Planning</u> include the following:</p> <ol style="list-style-type: none"> <li>5. How does the design locate entrances at prominent intersections and pathways?</li> <li>7. How does the design encourage human activity on the ground plane?</li> <li>8. How does the design encourage and support pedestrian and bicycle activity?</li> </ol> <p>Design Guidelines included in the Draft MIMP for <u>D. Pedestrian Environment</u> include the following:</p> <ol style="list-style-type: none"> <li>1. How does the design incorporate convenient, attractive, well-lit, and protected pedestrian entries?</li> </ol> <p>Design Guidelines included in the Draft MIMP for <u>Athletics and Recreation</u> include the following:</p> <ul style="list-style-type: none"> <li>• Athletics and Recreation buildings that front a public right-of-way should be designed with sensitivity to the pedestrian scale along sidewalks and paths with the use of detailing, unit-based expression of materials, and/or wall openings.</li> </ul> <p>These design guidelines will be included, and impacts analyzed in the <i>Land Use Plans and Policies</i> section of the Draft EIS.</p>		

# DAC Comments on the Prelim Draft EIS

<p><b>3.5</b></p>	<p><b>Height, Bulk, and Scale</b> - The increase of height limits, as well as the added potential for development sites that are larger than the prevailing pattern of the surrounding neighborhood, may result in adverse height, bulk, and scale impacts between areas of less intensive zoning and more intensive zoning.</p>	
	<p><b>SPU CAC EIS Scoping Comments</b></p>	<p><b>CAC Comments on Preliminary Draft EIS (09/2022)</b></p>
<p>2.</p>	<p>The proposed MIO boundaries increase all MIO-50 to MIO-65. Impacts on properties adjacent to the MIO boundary, specifically around the southwest portion of campus (7th Avenue W including W Cremona St., W Dravus St., and W Barrett St., and 5th Ave W between W Barrett St. and W Dravus St.) need to be analyzed. Mitigation measures, such as extending the MIO-37 buffer, and including landscape buffers, building setbacks, and buildings stepping up, need to be considered to create adequate transitions from the campus to these properties.</p>	<p>The CAC commented that views in this area are important, especially looking north, and listed one or two specifically. For example, Preliminary DEIS Figure 3.5-2 shows a proposed 6-story residence hall to the southeast of Ashton Hall (see page 3.5-9). This is one area that should include view studies: 1) From the west at the point in the 700 block of West Etruria Street (above the fence at the east end of the street) where the new building would be most visible; and 2) from the east/southeast, where there are nearby lowrise and single-family homes. As noted during the one of the CAC meetings, the depiction of the view from Dravus and 8th Avenue West, showing the top 2-3 floors of a new dorm building west of 6<sup>th</sup> Avenue West, does not appear to be accurate.</p>

# DAC Comments on the Prelim Draft EIS

**3.5 Height, Bulk, and Scale** - The increase of height limits, as well as the added potential for development sites that are larger than the prevailing pattern of the surrounding neighborhood, may result in adverse height, bulk, and scale impacts between areas of less intensive zoning and more intensive zoning.

Response: Additional viewshed photosimulations have been prepared for the Draft EIS and include views from the following locations:

- at 8th Ave. W. and W. Dravus St., looking east toward the SPU campus
- from the intersection of 5<sup>th</sup> Avenue W and W Eutruria Street looking north
- looking north from Queen Anne Avenue N, in between W Etruria Street and W Florentia Street
- view looking west from W Dravus Street, near its intersection with Queen Anne Avenue N

**Result:** As demonstrated in the Viewshed Figures on the following slides, the overall visual character from these viewpoints would change to include larger, taller buildings visible on the SPU campus. However, in most cases, street corridors and open areas/landscape screening would separate the new development from low-rise residential homes present in the vicinity and no significant impacts would be anticipated.

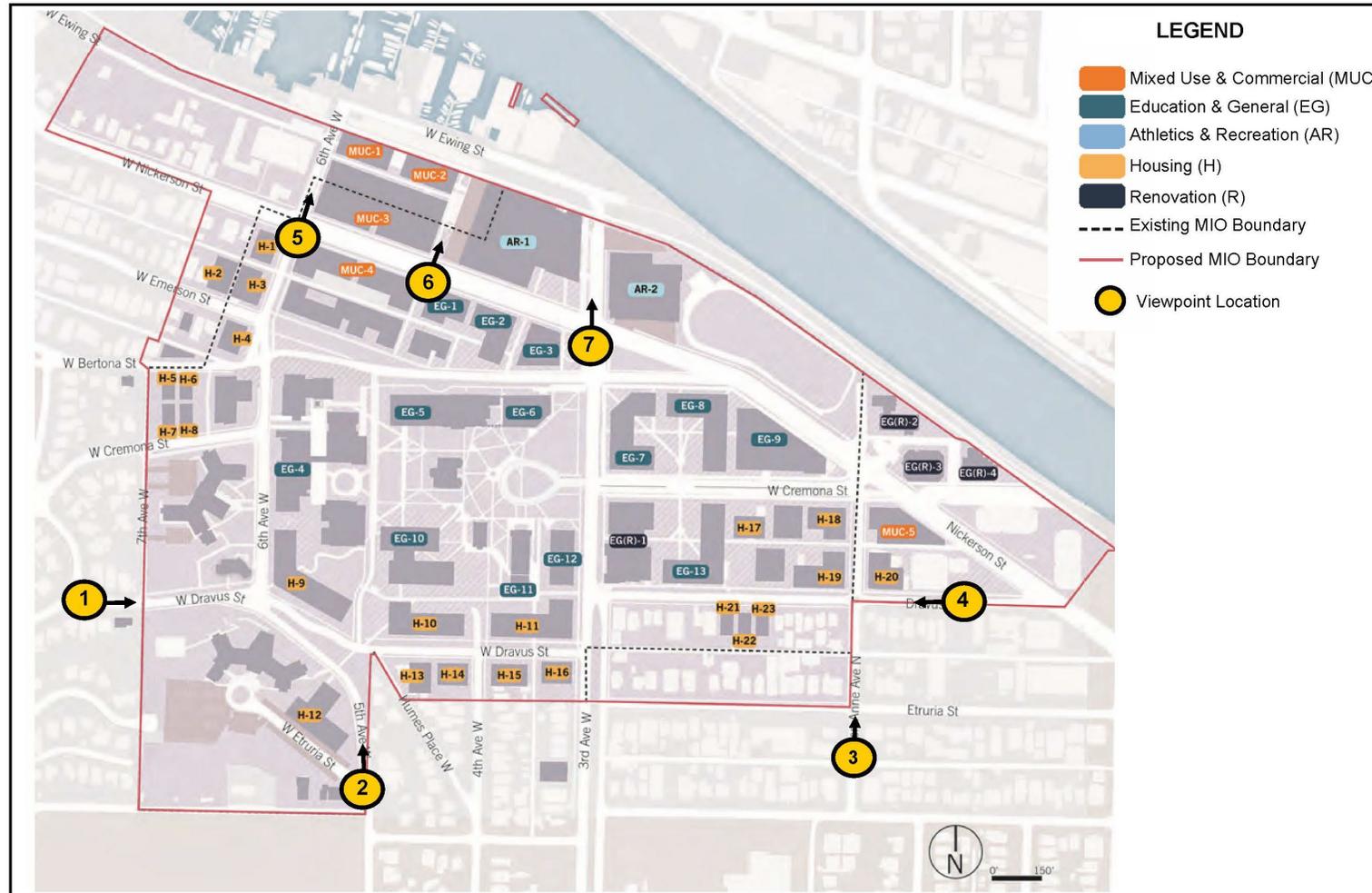
Several potential development projects are proposed in the Shoreline District within and adjacent to the Northwest MIO Expansion area (Buildings MUC-1, MUC-2 and AR-1). Three view photosimulations are provided and demonstrate that views of the water (where available) would not change significantly under the **Draft MIMP**. Shoreline view photos were taken from the following locations:

- W Nickerson St. at the intersection with 6th Ave. W, looking north
- W Nickerson St. at a mid-way point in between 6th Ave. W and 3rd Ave. W, looking north
- W Nickerson St. at the intersection with 3rd Ave. W, looking north

Figure 3.5-8 provides the locations of these viewpoints across campus.

# DAC Comments on the Prelim Draft EIS

## Seattle Pacific University Major Institution Master Plan Draft EIS



Source: Perkins + Will, Draft MIMP, 2023

**Figure 3.5-8**  
Viewpoint Location Map

# DAC Comments on the Prelim Draft EIS

## Seattle Pacific University Major Institution Master Plan Draft EIS



Source: Perkins + Will, 2021



Figure 3.5-9

Viewpoint 1—8th Ave. W and W Dravus St., Looking East (Proposed MIMP)

**Note:** for Viewshed #1 above, the elevation of the proposed building was confirmed to be accurately depicted in this photosimulation.

## Seattle Pacific University Major Institution Master Plan Draft EIS



Source: Perkins + Will, 2021



Figure 3.5-10

Viewpoint 2 – W Etruria St. and 5th Ave. W., Looking North (Proposed MIMP)

# DAC Comments on the Prelim Draft EIS

Seattle Pacific University Major Institution Master Plan  
Draft EIS



Source: Perkins & Will, 2023



Figure 3.5-8

Viewpoint 3 – Queen Anne Ave. North, Looking North (Proposed MIMP)

Seattle Pacific University Major Institution Master Plan  
Draft EIS



Source: Perkins & Will, 2023

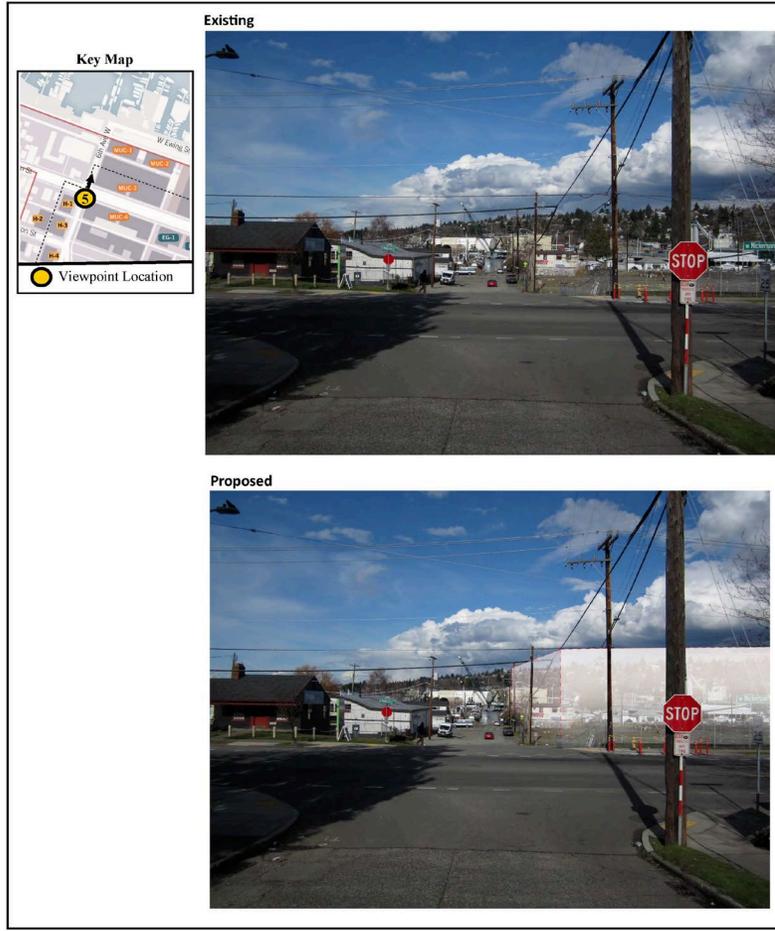


Figure 3.5-12

Viewpoint 4 – Dravus Street, Looking West (Proposed MIMP)

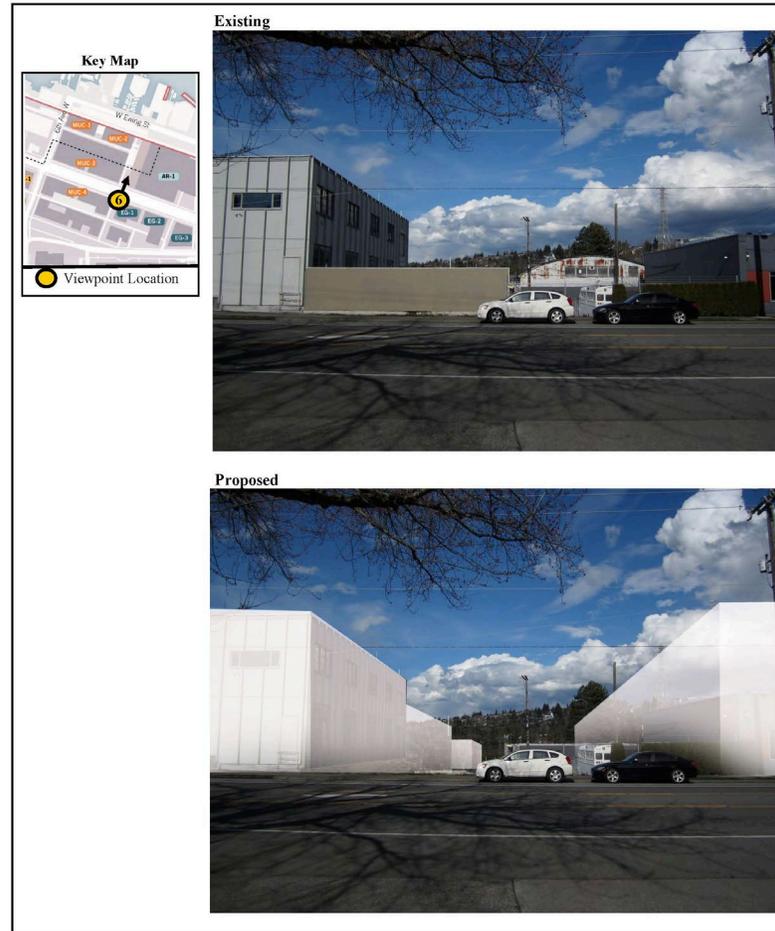
# DAC Comments on the Prelim Draft EIS

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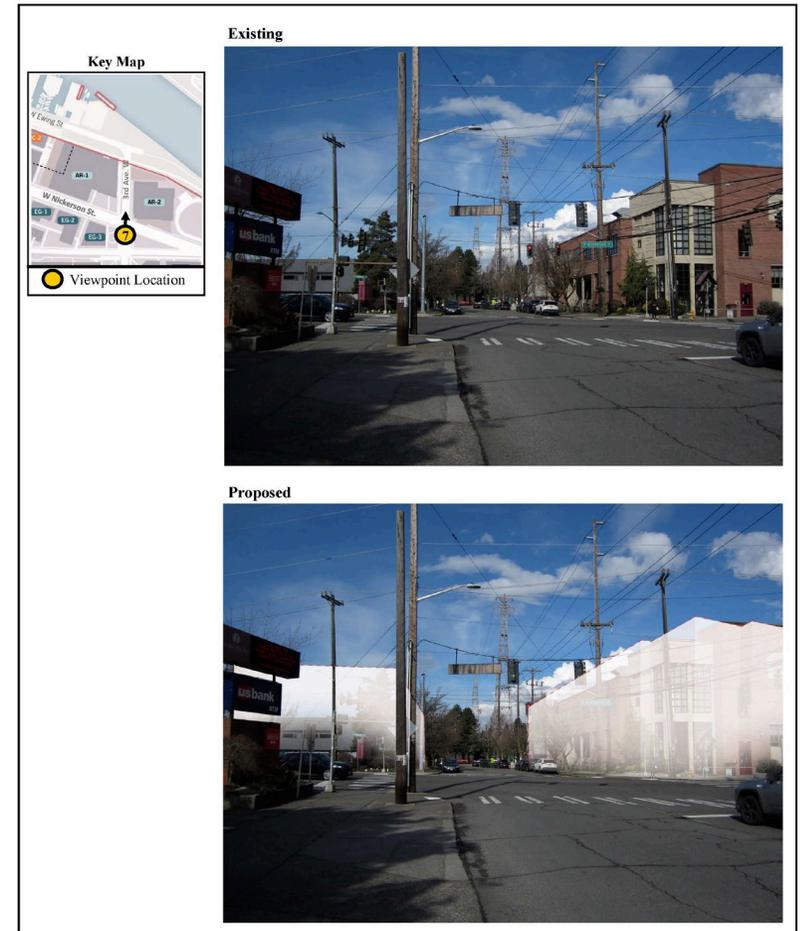
Source: Perkins + Will, 2023  
EA Engineering, Science, and Technology, Inc.  
**Figure 3.5-13**  
Viewpoint 5—W Nickerson and 6th Ave. W, Looking North

Seattle Pacific University Major Institution Master Plan  
Draft EIS



Source: Perkins + Will, 2023  
EA Engineering, Science, and Technology, Inc.  
**Figure 3.5-14**  
Viewpoint 6—W Nickerson St., Looking North, Between 6th Ave. W & 3rd Ave. W

Seattle Pacific University Major Institution Master Plan  
Draft EIS



Source: Draft MIMP, Perkins & Will, 2023  
EA Engineering, Science, and Technology, Inc.  
**Figure 3.15-15**  
Viewpoint 7—W Nickerson St. and 3rd Ave. W, Looking North

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3.5	<b>Height, Bulk, and Scale</b> - The increase of height limits, as well as the added potential for development sites that are larger than the prevailing pattern of the surrounding neighborhood, may result in adverse height, bulk, and scale impacts between areas of less intensive zoning and more intensive zoning.	
	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
3.	There are significant topographic changes on campus and the surrounding neighborhood. Consequently, the taller campus zoning heights will impact surrounding properties differently, depending on where each sits on the high and low points of the slope. For example, the area south of Hill Hall sits at the high end of the valley and should be assigned a lower building height.	In the cross-sectional analysis noted in the highlighted text on page 3.5-9, include E-W partial cross-sections that cut through the west campus MIO-50 (designated as area 11 in the MIMP) and the MIO-37 and MIO-65 (designated as areas 16 and 17 in the revised MIMP) to demonstrate that the height transitions are appropriate to the adjacent slopes.
<p><u>Response:</u> the <b>Draft MIMP</b> reduced the proposed MIO height in areas 16 and 17 from 65 feet to 50 feet, thereby substantially reducing the potential impact to off-campus residential neighborhoods adjacent to these areas on campus. Additional cross-sections were, therefore, not prepared for these areas.</p>		



# DAC Comments on the Prelim Draft EIS

3.4	<b>Land Use:-</b> Increasing the capacity for institutional uses by expanding the SPU MIO district may result in adverse land use impacts, including incompatibility with the surrounding residential uses; influence on the surrounding commercial land use pattern and availability of commercially zoned land; and creation of inconsistencies with the adopted goals and policies of the Seattle Comprehensive Plan.	
	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
4.	Analysis of the expansion of the MIO Boundary into non-residential areas needs to be provided to ensure future uses are compatible with adjacent properties, and explicit transparency with the current property owners is needed. Specifically, the area north of W. Nickerson St. and west of 6th Ave. W. and the area bounded by the triangle formed by W. Nickerson St., W. Dravus St., and Queen Anne Ave N.	This does not appear to have been analyzed in the Preliminary DEIS. The CAC expects that it will be addressed in the DEIS.
<p><u>Response:</u> the <b>Draft MIMP</b> states, “Little potential development is shown in the expansion areas. The northwest area is set aside as a potential soccer field, sized according to NCAA regulations, if SPU’s lease with Seattle Parks at Interbay is not renewed in 2029. The southeast area includes many buildings recently constructed with many years of useful life remaining. This area is intended for potential future use as institutional housing if SPU decides to purchase existing buildings and renovate or reuse them. The northeast area includes some potential new buildings, as well as some existing buildings SPU currently leases and could lease in the future. The expansion areas are also important given the unpredictable status of the many buildings that could qualify for designation as City landmarks. Such designations could prevent the University from redeveloping these buildings as envisioned in the plan, so the potential impact of this unknown factor is high. Expansion areas provide a contingency plan if the University cannot redevelop to meet modern educational needs and requirements within current boundaries.”</p> <p>The <i>Land Use</i> section of the Draft EIS is being updated to include an analysis of potential impacts associated with these proposed new uses in the MIO Expansion Areas.</p>		

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	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
5.	Impacts due to the reduction in the amount of commercial/industrial/light industrial property should be analyzed.	This does not appear to have been analyzed in the Preliminary DEIS. The CAC expects that it will be addressed in the DEIS.
<p><u>Response:</u> the analysis of potential impacts included in the Draft EIS acknowledges that proposed boundary expansion areas would expand into areas that are currently zoned for commercial and industrial uses, both of which are in limited supply within the city, and could potentially replace these uses with institutional uses.</p> <p><i>Commercial Uses:</i> Under the <b>Draft MIMP</b>, approximately 225,600 sq. ft. of new commercial/mixed-use development is proposed, and consistent with existing land use patterns and underlying zoning, commercial/mixed-use areas would continue to be located mostly along W. Nickerson St. This would contribute to maintaining commercial uses on campus and in the vicinity of campus and would also enhance accessibility to these services for the surrounding neighborhood and campus communities.</p>		

# DAC Comments on the Prelim Draft EIS

3.4	<b>Land Use:-</b> Increasing the capacity for institutional uses by expanding the SPU MIO district may result in adverse land use impacts, including incompatibility with the surrounding residential uses; influence on the surrounding commercial land use pattern and availability of commercially zoned land; and creation of inconsistencies with the adopted goals and policies of the Seattle Comprehensive Plan.	
	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
5.	Impacts due to the reduction in the amount of commercial/industrial/light industrial property should be analyzed.	This does not appear to have been analyzed in the Preliminary DEIS. The CAC expects that it will be addressed in the DEIS.
<p><i>Industrial Uses:</i> the Northwest MIO Expansion Area currently mostly consists of commercial and residential uses rather than industrial uses, therefore, the potential for displacement of industrial uses in this area is minimal. Furthermore, in 2018, the City Council approved a Comprehensive Plan amendment that removed the BINMIC designation from this area on the City of Seattle’s Future Land Use Map - Ordinance 125732 – and in 2019, Council then approved Ordinance 125845, which directed the following: 1) to permit major institution uses in new and existing buildings in industrial zones, and (2) allowed the creation or expansion of an MIO within industrial zones. The underlying industrial zoning in this area is IB U/45, the intent of which is to ‘provide an appropriate transition between industrial areas and adjacent residential zones, or commercial zones having a residential orientation and/or a pedestrian character’. Uses proposed by the <b>Draft MIMP</b> within this light industrially-zoned area would consist of mixed-use buildings, which would generally be compatible with existing adjacent light industrial development along the Ship Canal and commercial development along W. Nickerson St.</p> <p>An in-depth analysis of the economic impact to the possible reduction in the amount of commercial/industrial/light industrial property in the MIO Expansion Areas due to a transition to institutional uses is not within the scope of this EIS.</p>		

# DAC Comments on the Prelim Draft EIS

<p><b>3.4</b></p>	<p><b>Land Use:-</b> Increasing the capacity for institutional uses by expanding the SPU MIO district may result in adverse land use impacts, including incompatibility with the surrounding residential uses; influence on the surrounding commercial land use pattern and availability of commercially zoned land; and creation of inconsistencies with the adopted goals and policies of the Seattle Comprehensive Plan.</p>	
	<p><b>SPU CAC EIS Scoping Comments</b></p>	<p><b>CAC Comments on Preliminary Draft EIS (09/2022)</b></p>
<p>6.</p>	<p>If the Ashton Hall parking lot and entrance that are proposed for housing were to become future student housing, the inevitable increase in students' loud conversations and laughter late at night, sitting in groups on the front steps of houses on the south side of West Etruria Street, talking loudly, eating, smoking, and leaving cigarette butts and sometimes food wrappers would be seriously detrimental to the neighborhood. Compatibility of student housing with residential uses should be analyzed.</p>	<p>Comment #5 of the CAC's comments on the Draft MIMP stated that the CAC strongly supports SPU's decision to move this proposed student housing away from the Ashton Hall parking lot to West Cremona Street. That change resolved the issues listed in this CAC MIMP Scoping comment. However, the addition of a new student residence hall to the east of Ashton Hall, as shown in the PDEIS and the revised MIMP, revives the issues listed in this CAC comment. Further, the PDEIS is missing a general analysis of the compatibility of student housing with residential uses. In several places in the Land Use and the Height, Bulk and Scale sections of the PDEIS, the statement is made that there is such a thing as a "residential use buffer," i.e., that student housing, along with steep slopes and/or landscaping, creates a buffer of some type between surrounding single- and multifamily residential uses and more intense uses on the SPU campus. Yet, depending upon the time of day, or day of the week, student housing can be a use of equal intensity to other campus uses. The impact on surrounding residences is usually greatest at night, when most people are home. The proposed housing will undoubtedly remain, but the language in the PDEIS analysis should be revised to acknowledge its true impacts.</p>

# DAC Comments on the Prelim Draft EIS

**3.4 Land Use:-** Increasing the capacity for institutional uses by expanding the SPU MIO district may result in adverse land use impacts, including incompatibility with the surrounding residential uses; influence on the surrounding commercial land use pattern and availability of commercially zoned land; and creation of inconsistencies with the adopted goals and policies of the Seattle Comprehensive Plan.

Response: The Draft EIS acknowledges potential impacts to off-campus residential areas associated with on-campus student housing: *Potential land use impacts of these proposed uses could include increased noise levels, traffic, and pedestrian activity associated with an increase in the number of students living in this area. Although both of the on-campus and off-campus uses are residential in nature, they represent different land use intensities, which could create a potential incompatibility. However, required setbacks, street ROW corridors, large open space areas, and landscape screening would separate these new student residential uses on campus from low-rise residential homes off campus and reduce the potential for incompatibilities. As well, the underlying LR2 and LR3 zoning allows residential apartment type uses, therefore the student residence/apartment uses proposed in the **Draft MIMP** in these areas would be consistent with underlying zoning.*

SPU encourages students to remain respectful to neighbors and educates students prior to hosting large events on-campus about acceptable noise levels. Additionally, SPU complies with the City noise ordinance and works directly with neighbors to address noise complaints when there are noise complaints coming from students living in SPU-owned properties. However, SPU's authority to police off-campus behavior is limited. Many SPU students live off-campus in properties not owned by SPU, and many students living in the neighborhood are not SPU students but are students at other Universities. In these cases, neighbors should contact the other property owners or the Seattle Police.

# DAC Comments on the Prelim Draft EIS

<b>3.4</b>	<b>Land Use:-</b> Increasing the capacity for institutional uses by expanding the SPU MIO district may result in adverse land use impacts, including incompatibility with the surrounding residential uses; influence on the surrounding commercial land use pattern and availability of commercially zoned land; and creation of inconsistencies with the adopted goals and policies of the Seattle Comprehensive Plan.	
	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
7.	We note that the University owns a limited number of parcels outside of the MIMP present and proposed boundaries. Would the University consider selling those single family residential parcels that are west of the University, since future campus development will be directed to the east?	
Response: Comment noted. This question should be directed to SPU.		

# DAC Comments on the Prelim Draft EIS

<b>3.7</b>	<b>Shadows on Open Space:</b> The campus is located to the south of West Ewing Mini Park. The increase of height limits and potential for larger development sites may result in adverse impacts in the form of light blockage and shadows on this public open space.	
	<b>SPU CAC EIS Scoping Comments</b>	<b>CAC Comments on Preliminary Draft EIS (09/2022)</b>
10.	Light and shadow impacts should not be limited to the West Ewing Mini Park. Impacts due to light and shadow need to be analyzed for proposed development sites on all public spaces.	Confirm that the shadow studies reflect the proposed building locations for each Alternate shown in the Preliminary Draft EIS. For instance, the proposed building placements shown in "Alternate 2" in the SPU Shadow Study, are different than the Preliminary Draft EIS Figure 2-13.  This comment applies to overlay maps in other sections as well.
<u>Response:</u> The shadow graphics for the Draft EIS have been reviewed and updated with regards for accuracy of building and open space locations. The new figures have been included in the Draft EIS.		

# DAC Comments on the Prelim Draft EIS

<p><b>3.7</b></p>	<p><b>Shadows on Open Space:</b> The campus is located to the south of West Ewing Mini Park. The increase of height limits and potential for larger development sites may result in adverse impacts in the form of light blockage and shadows on this public open space.</p>	
	<p><b>SPU CAC EIS Scoping Comments</b></p>	<p><b>CAC Comments on Preliminary Draft EIS (09/2022)</b></p>
<p>10.</p>	<p>Light and shadow impacts should not be limited to the West Ewing Mini Park. Impacts due to light and shadow need to be analyzed for proposed development sites on all public spaces.</p>	<p>The boundary of the West Ewing mini-park is not accurate.</p> <p>The shadow studies are confusing and difficult to understand. Recommend reorganizing them and clarifying the graphics and image labels.</p> <p>The CAC strongly supports the mitigation recommendations outlined in 3.7.3 because tree canopy will evolve over time and small design changes can have a significant impact on overall impact on public and open spaces.</p>
<p><u>Response:</u> The shadow graphics for the Draft EIS have been reviewed and updated with regards for accuracy of building and open space locations, as well as the addition of new labels in order to clarify elements of each image. The figures have been updated in the Draft EIS. As well, a larger key map showing the locations of open spaces relative to the overall campus has been added to the Draft EIS.</p> <p>Comment noted.</p>		

# DAC Comments on the Prelim Draft EIS

3.3	Cultural Resources	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
11.	Provide an inventory of Historic structures and landscapes and plans to preserve/rehabilitate those proposed to be impacted by development.	Reiterating earlier comments that this element should include potential effects on potentially historic structures and landscapes. At the very least, a survey of the above, using recognized standards, such as NPS, is recommended.
Response: An analysis of Historic Resources (buildings/structures) was not included in the scope of the EIS.		

# DAC Comments on the Prelim Draft EIS

3.2	Plants & Animals (Tree Preservation)	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
12.	Provide an inventory of significant trees on and adjacent to the campus, paying particular attention to the deciduous trees near the President’s residence, and plans to preserve those proposed to be impacted by development.	<p>We support the continuation of SPU's annual tree health survey with a professional arborist. When making recommendations about new trees, consider the overall Master Plan design objectives in addition to appropriate tree size and species. To increase beneficial canopy as quickly as possible, we recommend planting trees that are as large as feasible.</p> <p>It would be helpful to have a map overlay for each of the alternatives</p>
<p><u>Response:</u> Comment noted. Several maps of the campus tree inventory are included in the <i>Arborist’s Report</i> in Appendix C to the Draft EIS. Due to the size of the SPU campus and the number of trees on campus, it is not possible to create a map overlay for each of the alternatives that would be legible at 8.5”x11” or even 11”x17” to include in the Draft EIS.</p>		

# DAC Comments on the Prelim Draft EIS

Noise		
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
13.	<p>If the Ashton Hall parking lot and entrance that are proposed for housing were to become future student housing, the inevitable increase in students' loud conversations and laughter late at night, sitting in groups on the front steps of houses on the south side of West Etruria Street, talking loudly, eating, smoking, and leaving cigarette butts and sometimes food wrappers would be seriously detrimental to the Neighborhood and needs to be analyzed. Areas where Major Institution uses are adjacent to residential uses should also be analyzed for noise impacts.</p>	<p><i>Committee Note: Noise was not identified as a contributing factor for the purposes of the EIS, however, the committee may continue to make comments for inclusion in future MIMP comments letters.</i></p> <p>Comment #5 of the CAC's comments on the Draft MIMP stated that the CAC strongly supports SPU's decision to move this proposed student housing away from the Ashton Hall parking lot to West Cremona Street. That change resolved the issues listed in this CAC MIMP Scoping comment. However, see Comment 6 above under Land Use.</p>
<p><u>Response:</u> Please refer to the response to Comment #6 above.</p>		

# DAC Comments on the Prelim Draft EIS

3.1	Air Quality / Greenhouse Gas Emissions	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
		The committee supports measures to reduce dust and contamination during construction activities using LEED or a similar City-recognized certification guideline.
Response: Comment noted.		

# DAC Comments on the Prelim Draft EIS

3.6	Public View Protection	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
		<p>The CAC agrees with the characterization of the impacts to the public views from David Rodgers Park, although a section and more complete rendering would be useful. However, the committee believes the impacts to other public views should be studied, particularly those within the residential zones along the west edge of campus and from public spaces such as nearby streets and sidewalks.</p>
<p><u>Response:</u> The viewshed section is analyzing designated, protected public views. The streets and residential zones cited in the comment are not included in the City’s list of designated protected views and, therefore, are not analyzed in <i>Section 3.6, Public View Protection</i>. However, several informational viewpoints are provided in <i>Section 3.5, Height, Bulk and Scale</i>, from surrounding areas, including one from the west edge of campus. Please see Figure 3.5-5 above under Comment #2 for the new viewshed locations – including new views of the shoreline area.</p>		

# DAC Comments on the Prelim Draft EIS

3.8	Parking	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
7	<p>Analysis of the on-campus parking supply and the rate charged to park on-campus needs to be analyzed. Supply should meet the needs of students and staff who choose drive to the campus as well as encourage students and staff to park on campus, as street parking in the neighborhood is very limited. This is of particular concern in areas where new on-campus housing is proposed close to residential streets</p>	<p>The PDEIS includes analysis of the on-campus parking supply but not the rate charged. Although not considered an environmental impact, the rate charged will definitely affect on-campus parking usage, and this should be addressed by SPU.</p>
<p><u>Response:</u> Parking fees would be reviewed as part of the annual TMP review and adjusted as needed to maximize use of on-campus parking as well as reduce single-occupancy vehicle mode choice. The parking supply for the campus is regulated by the SMC criteria for major institutions</p>		

# DAC Comments on the Prelim Draft EIS

3.8	Parking	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
8	<p>Only some streets impacted by the University are Restricted Parking Zones (RPZ). The University will need to work closely with the committee and SDOT to develop Commute Trip Reduction (CTR) methods and parking demand management strategies to reduce the number single occupancy vehicle (SOVs) trips to the campus. Increasing the number of RPZs could be an option – and if that happened, the impact on parking further away from campus should be analyzed</p>	<p>The CAC looks forward to a briefing on SPU’s Commute Trip Reduction Plan.</p> <p>Since the City’s Restricted Parking Zone program is still in effect, the CAC anticipates that there will be future discussions with SPU about specific neighborhood streets that should be included in the program.</p>
<p><u>Response:</u> The University supports the ongoing implementation of the RPZ program. The process to increase the current RPZ areas are outlined by the City and include broader neighborhood participation. SPU will continue to fund the program if expanded based on City process as originally required in the 2000 MIMP.</p>		

# DAC Comments on the Prelim Draft EIS

3.8	Traffic and Transportation	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
9.a	Street Vacation review has numerous steps before approval by the City Council. Attention to effects on traffic circulation, access to businesses, and conformance with city policies needs to be discussed thoroughly.	The CAC would like to also understand the impact on parking in the neighborhoods with the proposed street vacations. Parking in the neighborhoods is limited and a street vacation will remove regularly used on-street parking.
<p><u>Response:</u> The 6th Avenue W and W Emerson Street vacations would impact on-street parking, but all other street vacations would not as they would be vacations of alleys that do not allow parking. Based on the on-street parking inventory performed in 2015, there are a total of 10 parking spaces (as defined by SDOT) along 6th Avenue W and 21 parking spaces along W Emerson Street. The formal street vacation process, which requires approval as part of a separate council process would further evaluate parking impacts of the proposed vacations.</p>		

# DAC Comments on the Prelim Draft EIS

3.8	Traffic and Transportation	
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9.a	Street Vacation review has numerous steps before approval by the City Council. Attention to effects on traffic circulation, access to businesses, and conformance with city policies needs to be discussed thoroughly.	Along with consideration of the effect of vacations on the street network and the level of service, the City’s street vacation policies also note that, when multiple vacations are proposed in an area such as a Major institution, the City Council can request that a comprehensive review be undertaken to determine the cumulative effects of the vacations. This can include impacts to circulation, access, land use and urban form, as well as impacts to certain communities, public assembly and free speech.
<p><u>Response:</u> Comment noted. No action will be taken on the street vacations as part of the MIMP. The MIMP identifies that it is a desire of the University to consider street vacations in the future. Any street vacation will need to be approved as part of a separate council process in which impacts will be further evaluated.</p>		

# DAC Comments on the Prelim Draft EIS

3.8	Traffic and Transportation	
	SPU CAC EIS Scoping Comments	CAC Comments on Preliminary Draft EIS (09/2022)
9	<p>Analysis and attention need to be paid to plans for enhancing pedestrian and vehicular safety, especially at 3rd Ave W, West Bertona St., W. Nickerson St., and future “Campus Gateways.” Analysis on enhancing pedestrian and vehicular safety to accommodate more frequent pedestrian crossings, and discourage mid-block crossing, particularly if there are attractive mixed- use elements that draw students across these streets needs to be included.</p>	<p>It appears that the proposal to restrict left turns from W. Bertona St. to 3rd Avenue W. would lead to right turns from Bertona onto 3rd and then left turns to travel through residential streets to reach W. Nickerson. It is not clear that this was considered in the PDEIS.</p>

Response: Vehicles currently turning left from W Bertona Street to 3rd Avenue W or vehicles traveling straight through the intersection to continue along W Bertona Street are vehicles accessing Nickerson Street to travel eastbound. While some vehicles may choose to turn right on W Bertona Street and then turn left on W Cremona Street and W Dravus Street to access Nickerson Street, it is anticipated that the majority of vehicles will instead turn onto 6th Avenue W and turn right onto Nickerson Street at the proposed traffic signal. The analysis of the mitigation scenario assumes that 80 percent of rerouted trips from W Bertona Street/3rd Avenue W are rerouted to the 6th Avenue W/Nickerson Street signal, while 20 percent of rerouted trips would access Nickerson Street via neighborhood streets. This represents 31 vehicle trips during the AM peak hour and 39 vehicle trips during the PM peak hour.

# DAC Comments on the Prelim Draft EIS

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<p><u>Response:</u> The Preliminary DEIS includes an analysis of study area intersections with the proposed mitigation measures in place, including the proposed traffic signals and details the impacts of such measures. Additionally, with the proposed projects along Nickerson Street, some of the commercial and industrial uses would be eliminated and replaced with new mixed-use buildings. Each building would be required to provide adequate loading facilities as part of future Mixed-Use Project (MUP) processes.</p>		

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<p><u>Response:</u> The existing traffic signal at 3rd Avenue W provides a signalized crossing for bicyclists traveling to and from the Ship Canal Trail. The proposed traffic signal at 6th Avenue W/Nickerson Street will provide additional connectivity across Nickerson Street for bicyclists between the trail and the campus.</p>		

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9	<p>Analysis and attention need to be paid to plans for enhancing pedestrian and vehicular safety, especially at 3rd Ave W, West Bertona St., W. Nickerson St., and future “Campus Gateways.” Analysis on enhancing pedestrian and vehicular safety to accommodate more frequent pedestrian crossings, and discourage mid-block crossing, particularly if there are attractive mixed- use elements that draw students across these streets needs to be included.</p>	<p>Eliminating the left turn onto 3rd from East bound traffic on Beronta would encourage traffic to use W Dravus.</p> <p>W Dravus has very limited sight lines and a challenging intersection where 5th, 6th and W Dravus meet. Neighbors in Queen Anne Park have expressed several concerns with the transportation aspects of the proposed MIMP:</p> <p>The attempt to slow traffic down on, or divert it from, W. Bertona St. will simply divert traffic from Bertona to neighborhood streets, which are curved, have limited sight distances, are lined with parked cars, and are extensively used by pedestrians, thereby making the residential streets unsafe for cars, bikes/scooters, and pedestrians; and the proposed vacation of 6th Ave. W., which is used by many residents to the south of SPU to access W. Nickerson St. and then 15th Ave. W., would require them to instead access 15th via W. Barrett St., parts of which are very narrow and will become heavily used when a new townhouse development is constructed there, across from the cemetery, next year.</p>

Response: Vehicle traffic along W Bertona Street is anticipated to decrease due to the proposed turn restrictions due to an improved connection to Nickerson via the proposed traffic signal.

As it relates to the 6th Avenue vacation, a limited amount of vehicular traffic is observed using 6th Avenue under existing conditions. Based on counts completed in early 2023 with classes in session, there were a total of 5 vehicles traveling north along 5th Avenue W towards 6th Avenue W during the AM peak hour, and a total of 6 vehicles making this movement during the PM peak hour.

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<p><u>Response:</u> Additional analysis of the traffic volumes in this area was conducted with and without the University is session. The analysis showed minimal traffic increases when comparing AM and PM peak hour volumes for these two conditions. The results of this analysis will be included in the DEIS.</p>		

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<p><u>Response:</u> The PDEIS provides the anticipated trip generation, trip distribution, and assignment at the study area intersections. The impacts of these trips are evaluated through calculation of the intersection level of service and comparison of the without (No Action) MIMP and with (Action) MIMP conditions.</p>		