August 18, 2009

Mr. Colin Vasquez  
Senior Land Use Planner  
Seattle Department of Planning and Development  
700 – 5th Avenue, Ste. 2000  
Seattle, WA 98124-4019

Re: Seattle Pacific University Request for a DPD Decision Regarding Master Plan Changes for Proposed University Center Project

Dear Mr. Vasquez:

This letter is a request for determinations by the Director of the Department of Planning and Development as to whether Seattle Pacific University’s development of the proposed University Center Project would require changes to the University’s Major Institution Master Plan (MIMP) and, if so, what type of MIMP change is required pursuant to SMC 23.69.035.

Proposed University Center Project

The proposed University Center will be an 117,000 square foot building complex to replace outdated existing academic facilities and provide additional academic space in a collaborative environment for the visual and performing arts programs. The project will provide thirteen state-of-the-art classrooms, a new learning center for faculty and students, a small-scale performance space, lecture and recital space, a performance hall with approximately 1,100 seats, and an "arts street" to provide open space and circulation. It will be located on the SPU campus on a site bounded by Third Avenue West on the east, West Dravus Street on the south, the Dravus Parking Lot and the McKinley Auditorium on the west, and the Tiffany Loop on the north. (See attached project site drawing and concept plans). Approximately half of this site is currently used as a surface parking lot. The other half contains six SPU-owned buildings, which will be demolished. These include four small houses (including one used as an office), Beegle Hall, and the Crawford Music Building. All of these buildings, except the Crawford Music Building, were proposed for demolition in the MIMP.

How the MIMP Authorizes Future Development; and Potential MIMP Changes

The Development Program section of the MIMP authorizes future University development as follows:

- The MIMP authorizes a certain amount of future development. See Table 2 on p. 18, and Table 3 on p. 24. At 117,000 square feet, the project is well within the limits of future development in the MIMP.
• The MIMP divides the campus into “primary use zones” including Academic, Residential, Recreational, Parking, Core, and others. The subject site is split between two primary use zones: Academic, and Parking. Because the University Center Project does not include parking, there is a question as to whether it is necessary to amend the MIMP to change the Parking area to another primary use zone, e.g. Academic and Core.

• The MIMP identifies potential development sites on campus where new projects could be built. It identifies the subject site as a development site in Figure 6 on p. 20. However, the identified development site does not include the site of the Crawford Music Building. Since the current project includes the Crawford Music Building site, there is a question as to whether it is necessary to amend the MIMP to expand the development site.

• The MIMP identifies buildings to be demolished. See discussion on p. 19 and list at Appendix D. The Crawford Music Building is not included on the list, so there is a question as to whether it is necessary to amend the MIMP for this demolition.

SMC 23.69.035 Requirements re MIMP Changes

If a MIMP amendment is required, the City considers and acts on the proposed amendment pursuant to SMC 23.69.035. Amendments are categorized as exempt, minor, or major.

An amendment is exempt from City approval if it is a change to the design or location of a planned structure or other improvement from that shown in the MIMP. Exempt changes include:

1. Any new structure or addition to an existing structure not approved in the MIMP that is 12,000 square feet of gross floor area or less; or
2. Twenty or fewer parking spaces not approved in the MIMP; or
3. An addition to a structure not yet constructed but approved in the MIMP that is no greater than 20% of the approved gross floor area of that structure or 20,000 square feet, whichever is less; or
4. Any change in the phasing of construction, if not tied to a MIMP condition imposed under approval by the Council; or
5. Any increase in gross floor area below grade.

A minor amendment to the MIMP may be considered and approved if it is not an exempt change, it is consistent with the original intent of the adopted plan, and when it meets at least one of the following criteria:

1. The amendment will not result in significantly greater impacts than those contemplated in the adopted master plan; or
2. The amendment is a waiver from a development standard or master plan condition, or a change in the location or decrease in size of designated open space, and the proposal does not go beyond the minimum necessary to afford relief and will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity in which the Major Institution is located; or
3. The amendment is a proposal by the Major Institution to lease space or otherwise locate a use at street level in a commercial zone outside an MIO District boundary.
An amendment is considered major if it is not an exempt change or a minor amendment. In addition, any of the following shall be considered a major amendment:

1. An increase in a height designation or the expansion of a boundary of the MIO District; or
2. Any change to a development standard that is less restrictive; or
3. A reduction in housing stock outside of the MIO District boundary but within 2,500 feet; or
4. A change to the single-occupancy vehicle goal of an approved transportation management program; or
5. A use that requires Council Conditional Use approval; or
6. The update of an entire development program component of a MIMP.

Change Primary Use Zone from Parking to Academic and Core/Support

Construction of an academic or core/support use on the portion of the site identified for parking may not require an amendment of the MIMP. In the discussion of the primary use zones, the MIMP states “Some mixing of the various types of University uses within each of these zones is anticipated, e.g., the inclusion of some classrooms and offices in the residential primary use zones and physical education facilities in the recreation primary use zones.” Constructing an academic and core/support use in a portion of an area designated for parking could be considered an allowed “mixing” of uses within the intent of this provision and, therefore, would not require a MIMP amendment.

However, if DPD believes this change is not the type of allowed mixing of uses contemplated by this provision, then the University hereby requests that DPD authorize the change as a minor MIMP amendment. This change satisfies the requirements for a minor amendment for the following reasons:

- The change is consistent with the original intent of the MIMP. The MIMP contemplated developing academic buildings and a performance hall. See Table 4 on p. 24. The University will still meet its code-required minimum parking requirements even if it uses a portion of the parking-designated property for non-parking purposes. See MIMP Appendix G Parking Calculations. Construction of parking on this site is not required to meet the projected demand for parking and could cause the University to exceed the MIMP’s maximum parking requirements.
- The amendment will not result in significantly greater impacts than those contemplated in the adopted master plan. The MIMP, and the accompanying EIS, contemplated the development of over 500,000 square feet of new space on campus. The University Center project represents part of that development space, so its impacts will not be greater than those contemplated in the MIMP. The MIMP included an “auditorium/chapel” (now known as the “performance hall”) in the list of potential development projects (see Table 3 on page 24). The size of the performance hall was not specified in the MIMP development program, but was assumed in the parking requirements table to be 3,000 seats, vs. the currently proposed 1,100 seats (see Appendix G). A recent parking study has shown that there should be ample parking spaces in nearby commuter lots to accommodate performances held during evenings and weekends.
Therefore, the traffic and parking impacts of the University Center project would be less than those contemplated in the MIMP for the originally-proposed auditorium/chapel.

**Expand the Development Site to Include the Crawford Music Building Site**

Expansion of the development site to include the Crawford Music Building Site may not require a MIMP amendment. In the discussion of potential development sites on the bottom of p. 24, the MIMP states:

Sites for potential projects are depicted on Figure 6. However, the *sites*, sizes, and other features of potential development may change as additional information is developed in the years following the adoption of the Master Plan. As provided by City of Seattle Land Use Code Section 23.69.030E(11), “information about potential projects is for the purpose of starting a dialogue with the City and community about potential development, and changes to this information will not require an amendment of the master plan ...” (Emphasis added.)

Expanding the development site shown on Figure 6 to include Crawford Music could be considered a change in the site of potential development as contemplated in the provision quoted above, and therefore may not require a MIMP amendment.\(^1\)

Nevertheless, in an abundance of caution, the University hereby requests that DPD authorize the change as a minor amendment. This change satisfies the requirements for a minor amendment for the following reasons:

- The change is consistent with the original intent of the MIMP. The MIMP contemplated developing academic buildings and a performance hall somewhere on campus. See Table 4 on p. 24. A specific site for the performance hall was not designated in the MIMP. The MIMP contemplated some form of development on the proposed site, and the Crawford Music site represents a minor expansion of that approved site.

- The amendment will not result in significantly greater impacts than those contemplated in the adopted master plan. As discussed above, the MIMP, and the accompanying EIS, contemplated the development of over 500,000 square feet of new space on campus. The University Center project represents part of that development space, so its impacts will not be greater than those contemplated in the MIMP. Also as discussed above, the currently-proposed performance hall will be smaller than the auditorium/chapel authorized in the MIMP, so the traffic and parking impacts will be less than contemplated in the MIMP.

**Demolition of Crawford Music Building**

\(^{1}\) The portion of the University Center project to be constructed on the site of the Crawford Music Building is small, i.e., less than 20,000 sq. ft. Under the Major Institutions Land Use Code, small additions to approved but not yet constructed projects are exempt MIMP changes (defined as additions less than 20% of the the approved structure or 20,000 sq. ft., whichever is less). SMC 23.69.035 B.3. While this exemption does not apply to this situation, it demonstrates an intent that a 20,000 sq. ft. addition is considered small and insignificant.
It is not certain that a MIMP amendment is required to authorize the demolition of the Crawford Music Building. The Major Institutions Code, Chapter 23.69 SMC, does not require a MIMP to identify structures to be demolished. See SMC 23.69.030 (listing required elements of MIMPs, not including anticipated demolition projects). Under certain circumstances, the Major Institutions Code does require MIMP identification of residential buildings slated for demolition, but Crawford Music Building is not a residential building.

Nevertheless, in an abundance of caution, the University hereby requests that DPD authorize a minor MIMP amendment for the demolition of Crawford. This change satisfies the requirements for a minor amendment for the following reasons:

- The change is consistent with the original intent of the MIMP. The MIMP contemplated the demolition of structures to make room for new development. It contemplated the demolition of the book store and bank building located at 301-310 W. Bertona St. for construction of an auditorium/chapel. See Appendix D and Development Standard T on p. 46 of the MIMP. The University intends that the performance hall in the proposed University Center Project would be constructed in lieu of the auditorium/chapel and the demolition of the book store and bank would be postponed. Therefore, the proposed demolition of Crawford is a substitute for other demolition listed in the MIMP.

- The amendment will not result in significantly greater impacts than those contemplated in the adopted master plan. Because demolition of Crawford substitutes for demolition of the book store and bank, the increase in the building space that will be demolished to construct the performance hall will be only 6,311 square feet which is insignificant.

Demolition of the buildings on the site is an issue that will require you to consult with the Department of Neighborhoods regarding potential historic and cultural significance. Therefore, we have attached copies of historic and cultural resources reports that have been prepared by the Johnson Partnership for the Crawford Music Building. The conclusion of these reports is that Crawford does not meet the criteria of the Landmarks Preservation Ordinance for designation as a landmark. Additional historic reports for Beagle Hall and the four other small buildings on the site are also attached, since these buildings are also proposed for demolition.

The Changes Are Not Major MIMP Amendments

The changes will not require an expansion of the MIO boundary, an increase in a height designation, changes to the development standards, a reduction in the housing stock outside the MIO boundary, a change to the single-occupancy vehicle goal of the approved TMP, a use that requires Council Conditional Use, or the update of the development program component of the MIMP. As described above, the changes meet the criteria for approval as minor MIMP amendments.

Conclusion

As you know, during a recent review of the conceptual plans for the University Center with the Standing Advisory Committee (SAC), some questions were raised about how the project would relate to the edges of the campus. We believe that the design development drawings will show how these issues have been addressed in a manner that will be acceptable to the SAC. Another
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SAC review of the project has been scheduled on August 19, during which the SAC could provide DPD with their comments regarding the master plan changes. Prior to the SAC meeting, we would appreciate hearing from DPD with regard to the MIMP changes discussed in this letter.

Thank you for your consideration of these requests. Please feel free to contact me with any questions or comments.

Sincerely,

David B. Church  
Assistant Vice President for Facility and Project Management  

cc w/encl:  
Rolfe Kellor, Campus Master Plan Consultant  
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