



10 November 2016

Via E-mail

Ms. Julie Blakeslee  
Environmental & Land Use Planner  
Capital Planning & Development  
Box 352205  
Seattle, WA 98195-2205

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Re: Comments for the Draft 2018 Campus Master Plan and DEIS

Dear Ms. Blakeslee:

On behalf of Historic Seattle I am writing to comment on the Draft 2018 Campus Master Plan (CMP) and Draft Environmental Impact Statement.

Founded in 1974, Historic Seattle is a nonprofit membership organization dedicated to preserving Seattle's architectural legacy. We believe that historic places, such as the University of Washington (UW) Seattle campus, provide an essential link to the past, reminding us of who we are and where we came from.

Historically, the UW has had one of the most impressive and beautiful university campuses in the United States. Guided by its late 19<sup>th</sup> and early 20<sup>th</sup> century plans and executed designs, the campus's character-defining features, spaces, and buildings reflect an evolution of development and growth through many decades. The significant historic resources on campus include not only the older buildings but also the collection of post-WWII resources.

To fully reflect its history, the UW must carefully consider the value of its historic and cultural resources from all eras, not just the older buildings related to its early roots. The draft campus master plan continues the UW's disregard of most of its post-WWII historic resources. This past summer, the National Register-listed Nuclear Reactor Building was demolished to make way for the new CSE II building. The draft plan indicates its intent to demolish more significant mid-century modern resources, such as McMahon Hall and Haggett Hall dorms. Designed by the prominent firm of Kirk Wallace & McKinley Associates, both buildings were determined eligible for listing in the National Register of Historic Places by the Department of Archaeology and Historic Preservation (DAHP). A simple search of DAHP's database WISAARD database identifies additional eligible properties.

**1117 Minor Avenue  
Seattle, WA 98101**

(206) 622-6952  
INFO@HISTORICSEATTLE.ORG  
WWW.HISTORICSEATTLE.ORG

Neither the draft CMP nor the DEIS makes any reference to historic resources determined eligible for the Washington Heritage and National Registers. The map on page 86 (Figure 75. Historic and Cultural Resources, Existing Conditions) of the draft plan does not address eligibility, but it should in order to be more accurate and transparent.

The DEIS incorrectly identifies Cunningham Hall as being located directly east of Architecture Hall. That was the original location; it has since been moved. This glaring error should be corrected.

The DEIS erroneously identifies the UW's existing internal design review processes and Historic Resources Addendum (HRA) process as mitigation measures. The same processes used to justify demolition of historic resources and construction of replacement projects cannot be used as mitigation measures for the adverse impact. To state that implementation of these same measures results in no significant adverse impacts defies logic. **Meaningful mitigation measures must be identified.**

Neither the DEIS nor the draft campus master plan mentions the historic resources survey currently underway. It is our understanding that the City of Seattle and UW are conducting this survey. **The survey and its intent should be clearly referenced in the DEIS and draft campus master plan.**

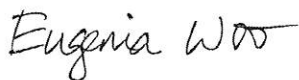
The draft plan highlights five guiding principles including Principle #5, Stewardship of Historic and Cultural Resources. We support this guiding principle but are troubled by contradictory statements in the Development Standards section (page 220) where it boldly declares that any structure that is more than 25 years old or historic can be demolished "if authorized by the UW Board of Regents." This statement provides an "out" to the University to make any decision it wants, even disregarding its own guiding principles.

Lastly, the University seems emboldened by the King County Superior Court ruling that it is not subject to the Seattle Landmarks Preservation Ordinance (LPO) by stating this in the draft campus master plan (page 225). However, a key point has been omitted—the fact that there is pending litigation in the State Court of Appeals regarding the very issue of whether the UW is subject to the LPO. **This fact should be stated in the draft campus master plan for the sake of accuracy and transparency.**

Historic Seattle understands the UW has growing needs, just like Seattle. In order to save historic places on campus, the UW may need to increase height limits on some sites or areas to allow new construction to achieve program needs. This can be done strategically and not negatively impact the campus as a whole, resulting in need new buildings and meaningful preservation of historic buildings and spaces. The final Campus Master Plan should not pre-determine the demolition of any historic resource.

Thank you for the opportunity to comment.

Sincerely,



Eugenia Woo  
Director of Preservation Services