



April 12, 2024

Ms. Carly Guillory
City of Seattle Department of Construction & Inspection
Seattle Municipal Tower
700 5th Suite 1900
Seattle, WA 98104

Re: Implementation Advisory Committee (IAC) Comments on Swedish Cherry Hill Hotel Project (SDCI Project #3025500) – Permissible Use, Design Review & Transportation Management Plan (TMP)

Dear Ms. Guillory,

This memorandum reviews the terms and conditions of the Swedish Cherry Hill Major Institution Master Plan (MIMP) as they relate to the hotel project, including permitted use, design review criteria, and adherence to the transportation requirements within the MIMP.

The members of the Swedish Cherry Hill Implementation Advisory Committee (IAC) submit the following comments in response to the proposed hotel project at the NE corner of 16th Ave and E Jefferson operated by Candlewood Suites IHG. Our comments will reiterate this committee's position that this project, as proposed to the IAC, does not meet the function or use standards for buildings proposed in any Major Institution Master Plan (MIMP), as outlined in SMC 23.69.008 and related sections, nor does it meet the purpose of a hotel as described in Swedish Cherry Hill's specific MIMP. These comments will also address our committee's mandated role to provide design review, given that the proposed hotel design has been substantially changed since our committee's initial review in October 2019.

In summary, the IAC strongly recommends SDCI deny a permit for Candlewood Suites at Cherry Hill (Project #3025500-LU). We find that the hotel project does not meet the requirements laid out by the City – both in the Seattle Municipal Code governing Major Institution Master Plans and in the Swedish Cherry Hill MIMP.

This project is not “functionally integrated with, or substantively related to, the central mission of the Major Institution,” per SMC 23.69.008.B, nor does it meet the specific MIMP requirement for Swedish Cherry Hill to serve “patients and their families”. As such, this project as proposed should not be permitted.

Additionally, in our review of the revised design for the hotel, the IAC strongly objects to the design changes made from the original Sanctuary Hotel proposal and which do not conform to the Master Plan Design Guidelines listed in Appendix H of the MIMP. What had

been lovely, thoughtful designs for a “boutique” hotel is now a simplistic, monolithic, plain low-budget hotel with no connection to the character or historic context of the campus or the neighborhood. Further, the new design eliminates or needlessly complicates ADA-accessibility, especially offensive revisions for a project designed to serve the needs of a hospital population. The plans have eliminated all parking and a public-serving café but added amenities such a gym to serve only guests, creating a hotel that is utterly unresponsive to the needs of and possible benefits to the surrounding residential neighborhood and its residents.

Considering the totality of the applicant’s plan as presented to the IAC, and the communications available to committee members, who are mandated to review both the project’s design and provide oversight for implementation of the Swedish Cherry Hill MIMP, it is obvious that this project does not reasonably meet the criteria of SMC 23.69.008.B as “functionally integrated with, or substantively related to, the central mission of the Major Institution.”

In addition to the constraint on MIMP development as defined by the SMC 23.69.008.B, Permitted Use Characteristics, the specific Master Plan for Swedish Cherry Hill includes additional requirements for a planned hotel. The committee finds no justification in the Swedish Cherry Hill MIMP for a hotel which serves guests who are not Swedish patients or their families. Hotel guests are not restricted to those receiving services at Swedish Cherry Hill; patients and their families who are served by Swedish First Hill and Ballard are expressly included in the MIMP. In the May 16, 2016, City Council findings related to this MIMP, #23 states “the MIMP would increase the hotel space to 40,000 square feet to provide additional accommodations for families of patients who are awaiting care at Swedish Cherry Hill” (pg. 6 of Council Findings Conclusions and Decision). The general public is **not even mentioned** in the MIMP or City Council’s description approving inclusion of a hotel on this campus. Thus, this project is outside the defined use in the Swedish Cherry Hill MIMP.

Because the project does not meet any of the criteria in SMC 23.69.008.B, it cannot be considered for approval under the MIMP and MIO and must instead be evaluated using the property’s underlying zoning of *SF 5000* (pg. 20 of the MIMP).

Therefore, we ask the Director to make a determination that this project does not meet the criteria to be a permitted use under the MIMP, and deny this Master Use Permit completely, or require the applicant to seek a rezone of the property.

If the project as currently proposed is approved by SDCI’s Director, the committee will consider this a major amendment to the Swedish Cherry Hill MIMP and will appeal the decision to the Hearing Examiner for noncompliance with the MIMP.

SECTION ONE – SMC AND MIMP PERMITTED USE:

SEATTLE MUNICIPAL CODE GOVERNING PERMISSIBLE USE OF MIMP PROJECTS

There is no question that the MIMP includes a hotel, yet committee members have no evidence that the hotel *as proposed* is substantively related to the mission of Swedish.

Because the IAC has had very few meetings since March 2020 - due in large part to the City's failure to recruit the required six members to constitute a committee meeting the membership standards outlined in the MIMP - the IAC has had limited opportunity to review the hotel project changes. Yet at no point over the past four years have we been informed of any substantive changes in any of our original findings (submitted in October 2019) of the hotel's use, as proposed by its developers to the City and to the committee.

This project as proposed still has not answered the many questions and significant concerns of committee members and neighbors about its compliance with SMC governing MIMPs, or its integration with the institution's MIMP. The Standing Advisory Committee (SAC) concluded – and the current IAC concurs -- that, as presented, the proposed hotel does not demonstrate compliance with the use requirements of the SMC and the Swedish Cherry Hill MIMP.

According to Seattle Municipal Code which governs Major Institution Master Plans, section **23.69.008** concerns **Permitted Uses**:

A. All uses that are functionally integrated with, or substantively related to, the central mission of a Major Institution **or that primarily and directly serve the users of an institution** shall be defined as Major Institution uses and shall be permitted in the Major Institution Overlay (MIO) District. Major Institution uses shall be permitted either outright or as Conditional Uses according to provisions of Section 23.69.012.

B. The following characteristics shall be among those used by the Director to determine whether a use is functionally integrated with, or substantively related to, the central mission of the Major Institution. No one (1) of these characteristics shall be determinative:

1. Functional contractual association.
2. Programmatic integration.
3. Direct physical circulation/access connections.
4. Shared facilities or staff.
5. Degree of interdependence.
6. Similar or common functions, services, or products....

F. Uses other than those permitted under subsections A and B of this section shall be subject to the use provisions and development standards of the underlying zone.

SMC clearly states both A and B must be satisfied for a MIMP project to be determined permissible use. If not, the code states that the underlying neighborhood zoning applies, and the Squire Park neighborhood is zoned primarily for low rise residential and single-family homes. No hotel is allowed within neighborhood zoning. The SAC – and now the IAC – find that the proposed hotel neither **meets the permitted use Seattle Municipal Code for major institution projects, nor demonstrates the function of a hotel described in the Swedish Cherry Hill MIMP.**

BACKGROUND:

The project applicant, Perfect Wealth, submitted a letter to SDCI on Nov. 16, 2016, which aimed to address the six characteristics (23.69.008.B) used to determine functional integration with, or substantive relationship to, with the central mission of Swedish Cherry Hill, the major institution. The applicant proposed:

1. **A functional contractual association** with Swedish Cherry Hill “to ensure the patients and families having privileges /advantages staying at the proposed property.”
2. **Programmatic Integration** with Swedish Cherry Hill to “primarily [serve] the patient and their families” through the hotel’s boutique branding.
3. **Direct physical circulation / access connections** by virtue of the hotel's physical proximity to the hospital facilities.
4. **Shared facilities or staff** “such as having the onsite nurse (shared staff with Swedish hospital) to handle the emergency situation.” In addition, the applicant boasted that their planned “Corner Cafe” would be an additional campus amenity for Swedish staff, patients, visitors, and neighborhood residents.
5. **Complete Independence** from Swedish Cherry Hill by maintaining “its financial independence instead of adding burden to the institution.”
6. **Similar or common functions, services or products** by providing a “majority of the hotel units to be accessible” to extend the capacity of Swedish outpatient services.

Relying predominantly on the applicant’s described intentions in relation to the SMC’s six characteristics for a MIMP project, SDCI prepared a memorandum dated March 16, 2018, responding to the applicant’s request for clarification of the hotel, specifically as planned at the time, as a permitted use. SDCI’s memorandum stated “the hotel is a permitted use within the Swedish Medical Center MIO as it was considered by the Master Plan (July 2016) and meets the criteria of SMC 23.69.008.B.”

This SDCI memorandum does *not* constitute a formal, binding interpretation according to SMC 23.88.020. And none of these conditions exist in the current hotel proposal.

After this memo by SDCI was issued, the former SAC conducted its mandated review of the project. The committee's review and comments submitted to SDCI in October 2019 provide lengthy citations of meeting notes and communications between the applicant and multiple City staff. In none of those communications did the committee see any movement by the applicant to implement or resolve any of the actions or arrangements that would have created any functional integration with or relationship to Swedish Cherry Hill's mission. In fact, over multiple SAC meetings, Swedish staff made it clear that this hotel will not be functionally integrated with Swedish Cherry Hill. Swedish staff cited HIPAA and other concerns about disclosing patient information to hotel operators and repeatedly asserted Swedish is "not in the business of running hotels" so would not be involved in any of the day to day operations of the proposed hotel – and could not verify that the benefit of the proposed hotel would go to Swedish patients and their families.

Perhaps the most significant concern to the committee (and community members) was the issue, articulated by City staff to the applicant, was the need for the applicant to "*include programmatic details outlining **how this hotel will be available for patients and families only, and not the general public.***" In the 2023 presentation to the IAC of the revised project design, the new architect described the hotel as also now intending to cater to "temporary staff". Though Swedish's mission is to serve their patients and their families, and patient care was the sole rationale for including a hotel in the MIMP (pg. 56), the applicant's communications and the hotel re-design demonstrates that the hotel will *not* be used only for patients and their families.

We urge the Department to refer to the committee's 2019 letter as a supporting document for this letter because nothing has been presented or shared with the IAC that demonstrates any change to the applicant's contractual association with Swedish Cherry Hill; to programmatic integration with Swedish Cherry Hill; to direct physical circulation or access connections to Swedish Cherry Hill; to shared facilities or staff with Swedish Cherry Hill; nor the hotel's complete independence from Swedish Cherry Hill.

A careful review of the applicant's most recent plans reveals the project has been stripped of at least 5 of the 6 proffered features which SDCI seemingly relied upon in its decision to informally determine that this hotel was a permitted use within the Swedish Medical Center MIO and Swedish Cherry Hill MIMP. Specifically, the six characteristics were either never possible, have been substantially altered, or never implemented for the proposed project:

1. **The committee sees no demonstration that the applicant's hotel project has a functional, contractual association with the hospital, the first permitted use characteristic marker in SMC 23.69.008. A functional contractual association** with Swedish Cherry Hill that provides privileges or advantages to Swedish patients, or their families has not been

established. The applicant has only provided a non-binding Memorandum of Understanding dated 10/11/2018, which specifically states “no contractual relationship is formed as a result of this MOU.” To this date, no proof of a “functional contractual association” with Swedish Cherry Hill has been produced by the applicant (Perfect Wealth). Swedish will neither own nor operate the hotel. The hotel will be owned by Perfect Wealth and day-to-day operations are planned to be contracted to and managed by Candlewood Suites IHG. Swedish is bound by law to ensure patients’ health information privacy (i.e. federal HIPAA compliance), so could not share information with the operator in order to ensure the hotel serves patients and their families.

2. The committee sees no demonstration that the hotel project meets the criteria of programmatic integration, the second permitted use characteristic marker in SMC 23.69.008, that could be used, in part, to show permitted use. **Programmatic Integration** with Swedish Cherry Hill to “primarily [serve] the patient and their families” does not exist. The hotel is now marketed as a Candlewood Suites, a 367-location chain hotel managed by InterContinental Hotels Group (IHG). In addition to the Candlewood Suites, IHG manages, markets or distributes rooms for more than 6,000 hotels including major chains like Holiday Inn & Holiday Inn Express. Applicant’s intent to brand, market, and distribute rooms with a major international hotel chain reveals that the hotel is not intended to “primarily [serve] the patient and their families,” but rather is intended as a hotel for the general travel market.

An earlier letter from the applicant to SDCI did not respond in any way to the question of how it integrates programmatically with Swedish – it asserts only that the MIMP describes future space needs predicated on growing bed counts which include a hotel: *“As stated in the MIMP, the inventory of space needs indicates that as future demand for inpatient hospital bed count grows, the need for hotel rooms will, concomitantly, grow. As the data suggests, a projected increase from 27 hotel rooms to 56 hotel rooms is needed by year 2023. By providing a 42-room boutique Hotel project ... that primarily serves the patient, and their families are in alignment with this need.”*

The revised hotel design actually reduces the total number of hotel rooms, from 42 (in 2019) to 37 rooms. Only 2 of these 37 rooms are ADA-compliant, which the architect stated in April 2024 is the City’s minimum required number of ADA rooms for *any* hotel: the current design does not adapt or respond in any way for the specific needs of hospital-related guests. Swedish has yet to disclose any plan or agreement for integrated programs, even the most basic as ensuring that patients and their families would be guaranteed to be able to book hotel rooms.

3. The committee understands it has never been proposed for the hotel to have direct physical circulation or access connections, the third possibility to illustrate permitted use characteristic in SMC 23.69.008. The lack of **direct physical circulation or connections** with proposed hotel is due to its location across the street from Swedish Medical Center’s southwestern corner. There is no physical circulation or access connections to any other Cherry Hill campus building. In the

applicant's letter to SDCI, they described "proximity (within walking distance)" to Swedish's campus, but no physical or direct connections.

4. The committee has seen no evidence that the hotel project meets the criteria of shared facilities or staff, the fourth permitted use characteristic in SMC 23.69.008 that could signal permitted use. **Shared facilities or staff**, "such as having the on-site nurse (shared staff with Swedish hospital)," is no longer mentioned, nor is reasonably to be expected, as an amenity at a limited-service chain hotel such as Candlewood Suites. In committee meetings, Swedish has made it clear that any staff nurse choosing to work at the hotel would not be an arrangement between Swedish and the hotel - it would be a private arrangement by individual nurses, and therefore it would have no functional integration between the hospital and the hotel.

In an early letter to SDCI, the applicant wrote "*The proposed facility provides majority of the units to be accessible units with special features to meet the special needs for Swedish patients and families.*" The SMC does not reference accessible facilities; it refers to shared facilities, and because the hotel has no physical, contractual or legal connection to other institutions within the MIO, it cannot qualify as a shared facility. As mentioned, in the redesign, the hotel has only two "accessible" rooms with no "special features" to meet the special needs of patients.

The original design proposal included a cafe open to the public that was promoted by the applicant as an "additional amenity (shared facility)", yet a café qualifies neither as a shared facility nor shared staff with Swedish: "*Just as this boutique hotel can be an asset to the Swedish Institute and the surrounding neighborhood, the hotel's accessory function - the 'Corner Café' on the ground floor can be an additional amenity (shared facility) to the Major Institution. This nice accessory not only primarily serve the Swedish staff, their patients and families, but also add warmth and welcome feel to the local community.*" While it might have been a nice feature, it was not central to the mission of the hospital - and the revised hotel design removed the proposed "Corner Cafe," eliminating a high-profile public campus amenity for Swedish staff, patients, visitors and neighborhood residents. Instead, the applicant proposes a limited "Candlewood Cupboard" intended for hotel guests. None of these counts as a shared facility or shared staffing.

5. The committee cannot identify any way in which the hotel project or Swedish Cherry Hill are necessarily connected to the other; the "degree of interdependence", the fifth permitted use characteristic in SMC 23.69.008, is zero. **Degree of Interdependence.** By removing or substantively altering four of the characteristics above, this project has no discernable dependence on Swedish Cherry Hill patients and families as its primary market. Instead, the hotel, as currently designed, would primarily exist to serve the general travel market, and would not be interdependent with Swedish Cherry Hill, nor would Swedish Cherry Hill be specifically reliant on the hotel to support its central mission.

Perfect Wealth described no ways in which its business or operations would be interrelated with Swedish Cherry Hill. On the contrary, the applicant wrote that “it will maintain financial independence” from Swedish.

Without shared facilities or staff; without direct, physical connections or access; and without agreements for shared programming, the applicant has not demonstrated to the committee a single way their hotel project is interdependent with Swedish. Even if the applicant were able to illustrate a single element, city code clearly states, “no one of these characteristics shall be determinative.”

The revised hotel design eliminates its own parking garage and, in 2023, the architect stated the applicant had “started a conversation” with Sabey about a shared parking agreement so hotel guests could use parking that is currently reserved for the use of hospital patients and staff. This possible single, as yet un-documented connection between the proposed hotel and Swedish Cherry Hill not only adds to the neighborhood’s significant and ongoing concerns about already-insufficient parking for Swedish patients, staff and tenants, the committee does not believe parking is related to “**the central mission**” of Swedish, as required to satisfy this one characteristic of SMC 23.69.008.B. Furthermore, if a parking agreement exists, it has not been shared with the IAC.

6. The committee has seen no evidence that the hotel project meets the criteria of similar or common functions, services or products, the sixth permitted use characteristic in SMC 23.69.008. **Similar or common functions, services or products** by designing a “majority of the hotel units to be accessible” are no longer reflected in the plans. Rather than providing a “majority” of accessible units, this 37-room hotel will only offer two ADA-accessible rooms for guests with disabilities.

ADA accessibility is not specific to hospitals; all hotels must have some rooms that meet this standard, and the re-designed plans reflect the bare minimum of accessible rooms for any hotel, according to the SMC. The hotel proposes no specialized services, products, or programming different than any other hotel in Seattle would offer.

SWEDISH CHERRY HILL MIMP – “PATIENT FAMILY HOTEL”

With the information provided to the committee since February 2019 about this proposed hotel, IAC members have no evidence that supports the request for permitted use for this hotel using SMC’s Permitted Use characteristics, or criteria, beyond the fact that the MIMP allows for a hotel for patients and their families.

Plans for a hotel serving patients and their families are not new for this campus: even the 1994 MIMP for then-Providence Hospital lists proposed uses that includes guest beds (“dormitory-

style inn for patients and their families”): a proposed new Providence Inn was slated for construction on 18th Ave with 40 rooms “to be used for patients and their families only” (p. 14).

The 2016 Swedish Cherry Hill MIMP allows for a maximum build out of nearly 3 million square feet, which includes planned space needs for a “Hospital, Clinical/Research, Education, **Hotel**, Long-Term Care/Assisted Living/Skilled Nursing, and Other Campus Support”: there is no question that a hotel has always been envisioned for Swedish Cherry Hill. But by including a hotel in the expanded Swedish Cherry Hill square footage, it is designed to serve the needs and mission of Swedish, and, like the 1994 MIMP, the 2016 MIMP ordinance does not envision a hotel use other than for Swedish patient care and their patients’ families.

In reference to a hotel in the MIMP, the [Swedish Cherry Hill MIMP](#) refers to the hotel exclusively as the “hotel” or the “*Patient Family Hotel*” (p. 56). Nowhere in the MIMP is there a reference to hotel guests that are not patients or patients’ families: the MIMP solely describes a hotel for patient benefit, specifically related to anticipated increase in patients (‘inpatient bed growth’).

The purpose and size of the hotel and its guests are clearly described on page 139, the section on *Hotel Rooms*: “**The hotel forecast is primarily influenced by inpatient bed growth since the majority of the users are family members of inpatients. Some beds are used for early arriving inpatients and for outpatients coming from out of town for treatment.**” The majority of guests were planned to be patient families – the only other guests described were pre- or post- care patients themselves, not the general travelling public.

The MIMP sections on neighborhood amenities or benefits does not contain any references to the hotel as an amenity for the neighborhood. The justification for a hotel in the MIMP is exclusively based on Swedish’s mission to provide excellent care for its patients and their families – and the forecasted expansion of hospital beds.

On p. 131 of the MIMP, **Appendix G: Volume and space projections**, a hotel is listed as a **space need** in response to an assessment of demographics, health care delivery changes, etc. The MIMP includes forecasting methods that include average length of hospital stay and ‘bed need’ (p. 136) to justify an increased need for hotel beds - i.e. increases in inpatient bed use will increase the need by families to stay nearby.

On p. 139, under the heading **Space Needs - Hotel Rooms**, the MIMP describes the projected users of the hotel, which seems to be based on the Inn at Cherry Hill (rooms set aside within the hospital for patients’ families), which was in operation during the period when the MIMP was created but subsequently has been closed. Nowhere does the MIMP here include the possibility of non-patient related (‘general public’) uses of the hotel:

*The Inn at Cherry Hill provides ‘hotel’ rooms for the **convenience of inpatients and their families**. The Inn offers family members comfortable and **reasonably priced** accommodations*

on the Cherry Hill campus so they can be close by to their loved ones while they are treated at the Medical Center. It is also **used by patients arriving early** for their inpatient stay, as some procedures and admits occur in the early morning. The accommodation, repurposed from former patient rooms, lacks the types of space one would expect in a typical hotel. There are currently 29 beds available in mostly semiprivate rooms.

The hotel forecast is primarily influenced by inpatient bed growth since the majority of the users are family members of inpatients. Some beds are used for early arriving inpatients and for outpatients coming from out of town for treatment.

On page 139, (**Inpatient Bed Growth**) the MIMP anticipates the demand for hotel space this way: “Family members are more likely to choose to be nearby their loved ones for their intensive and shorter hospital stays, so it stands to reason that demand for hotel/Inn beds in will increase along with inpatient bed growth.” In projecting Hotel Room use on page 140, there is an assumption that approximately 10% of hotel rooms would be used for outpatients – patients arriving early or patients receiving treatment who live out of town. There is no forecast for non-patient-related demand for hotel rooms, because “The hotel bed projections understandably follow the same general increases as the inpatient bed projections.”

In the following section on **Space Needs** (p. 140), “The space benchmark for a modest hotel, as envisioned for the Cherry Hill Campus, is 1,000 Building Gross Square Feet (BGSF) per bed”.

Finally, according to the projected project timeline, the hotel was planned to be Phase E – the final phase of construction for this 20-year plan. While none of the timelines are binding and clearly subject to change, it provides context for the intent and purpose of this hotel. It bears noting that the projected hotel bed demand seems to assume a current level of use, as the Inn at Cherry Hill was providing, because hotel bed demand begins with 29 beds in 2012, rises to 51 beds in 2023, up to 72 beds in 2040 (note that the final MIMP reduced the total allowed hotel beds by 24 from Swedish’s projections.) It seems the level of projected demand for hotel beds was anticipated to grow as the other construction projects added more patient care – thus more need for more space for them and their caregivers – and that the Inn at Cherry Hill was intended to provide for the more limited demand in the meanwhile. If this hotel were built at the end of this 20-year Master Plan, as described in the MIMP, it seems reasonable that patients and their families could fulfill all the demand that Swedish projected.

To assess intent for the hotel that may not be captured in the MIMP itself, there are references to a proposed hotel in documents related to the creation of the MIMP (Swedish Medical Center Cherry Hill Campus – MIMP Citizens Advisory Committee Final Report and Recommendations – May 28, 2015): the CAC did discuss the proposed hotel. On p. 50, the report indicates that “Swedish says (the Inn) would serve not only Cherry Hill but also its First Hill and Ballard campuses” – there is no mention of non-hospital related guests. In submitted public comments cited on p. 527, it is described as “Hotel that serves First Hill and Ballard”. On p. 203 of the

CAC's *Final Report and Recommendations*, Swedish employee Mr. Cosentino described the future hotel plans by describing the anticipated growth in guest rooms (24 to approximately 84 rooms by 2040) in the West Tower, saying "These rooms will be restricted to only patients and families and not for the public."

The Swedish Cherry Hill Master Plan ordinance and the process leading up to the final plan clearly describes and allows a hotel to be built – but one that is quite unlike the proposed hotel use presented to the SAC and IAC over the past years and as recently as this month. This project is incompatible with the MIMP’s explicit mission to serve patients and their families, and it does not reflect the expectations by the CAC, surrounding neighborhood, and the City’s hearing examiner that it would serve only patients and their families.

This expectation is even reflected in SDCI’s original direction to the applicant in 2016 – which the applicant has failed to do over the course of the last 8 years: to demonstrate *“how this hotel will be available for patients and families only, and not the general public”*.

**SECTION TWO - DESIGN REVIEW FOR
CANDLEWOOD SUITES HOTEL:**

Design revisions were presented on Jan. 11, 2023, to a group of four committee members, only three of whom are still on the committee. At the January 2023 presentation of the design revisions, committee members felt constrained in their ability to make informed comments or ask questions of the architect because the presentation materials we received were sent only the day before the committee’s meeting (notably less than the required 7 days), and the materials we received didn’t include the full materials presented. The current IAC membership includes three people who were not members of the committee nor in attendance for the January 2023 presentation.

The committee was also informed by the Law Department that without the required minimum membership of six, it was not allowed to conduct “substantive business”, i.e. not authorized to forward recommendations as a committee. The failure to recruit and constitute a fully functioning committee lies with the City’s Department of Neighborhoods (DON). It is charged with managing the IAC for MIMP oversight, the city’s method of ensuring the implementation of the MIMP conforms to the terms and conditions is through citizen volunteers who advise SDCI on compliance and review.

We are submitting comments only now because March 13, 2024, was the first time since February 2020 that the IAC has had its required minimum membership of six committee

members appointed by the City. As a result, March 2024 was the first time in four years the committee has been able to conduct what the City's Law Dept. called "substantive business."

Based on the new architects' significant modifications to the project, SDCI issued a re-notification of this project on February 8, 2024, with a two-week comment period (Feb 8-21), which covered a period in which the IAC was still below its required six members, and thus incapable of conducting the 'substantive businesses of an IAC. After DON staff cancelled five scheduled IAC meetings from November 2023 through February 2024, the IAC chair specifically requested SDCI's Director to extend the comment period further in order to allow the newly constituted full committee to review and comment as a functioning committee, Director Torgelson denied the request.

The next discussion of the hotel project was at our committee meeting on March 13, 2024. This was part of our committee deliberation portion of our regular agenda; there was no presentation and neither the developer nor the architects were present. When it was made clear by staff that SDCI would not commit to refraining from issuing a decision on a permit until our next regularly scheduled meeting on April 10, the IAC scheduled an additional meeting for April 1, 2024. At this April 1 meeting, the architects were present but told the committee they did not receive notification of the meeting in advance and only heard about the meeting "by accident". **Given that the IAC has an essential role in advising SDCI, the department's actions demonstrate a clear undercutting of the committee's role and responsibilities of MIMP oversight and design review.**

Our design comments on the new hotel project are less comprehensive than our original comments but represent a substantial review of the revised proposal. The comments below in *italics* are quotes from the committee's design review of the original plan - the comments in regular font are our comments on the proposed hotel design.

Re-Design Context and Major Elements:

In 2023, the architect described the new design in a presentation of approximately 20 minutes, including questions. Several of the revisions were described as aligning design to Candlewood Suites' brand, including room size, eliminating the café, eliminating ADA-compliant guest rooms, and adding a gym for hotel guests. Other significant changes are: the elimination of all parking connected to the hotel; modification of a loading zone; revisions to the street interaction including a more narrow ramp to the garage and an addition of pedestrian access to Jefferson St; a redesigned lobby with different programming; and, modifications to exteriors, including glazing, recessed areas in upper levels.

Capacity: The revised proposal is for a total of 37 rooms (eliminating 5 rooms from original design) including 3 extended-stay rooms on the ground floor.

Accessibility: Revised drawings show that the designated wheelchair/ADA-compliant rooms on all but 2 floors of guest rooms in the original design have been eliminated. At the April 1 meeting of the total 37 rooms, the architects were initially unable to answer how many ADA-compliant rooms were in the current design. After repeated questions, they demurred it was likely only “two or three”. A committee member could identify only two ADA-compliant rooms. The architects verified that two is the minimum required by City code for a hotel of this size. The architects confirmed that with some alteration, the other rooms could be made to be ADA-compliant, but it would require permanent construction, not minor adaptations in response to a request or reservation, for example.

MIMP DESIGN GUIDELINES

The following comments are organized to include the former SAC’s original comments and recommendations based on our design review of the original hotel proposal submitted to SDCI in October 2019 (*in italics*) - and the IAC’s current comments and recommendations on the revised hotel design (in standard font).

1.1.2 General Guidelines

The hotel design team presented a project with the goal of addressing the streetscape, mitigating the blank façades, acknowledging the character of the campus and surrounding neighborhood and softening the building edges on a highly visible street corner through landscape design.

The revised project maintains the blank façade to the north (facing the existing parking garage), but the architect described the composite wall as painted with colors that would provide a “rich palette”. The west-facing façade was described as having “some three-dimensional relief” and “detail” but in comparing the two drawing sets, the detail does not seem substantively different other than a recessed section for ‘shoring’.

The architect described the materials and color palette as relating to adjacent development on campus and the new townhomes and residential development south of Jefferson. Yet these choices do not “acknowledge the character of surrounding single family residential, multifamily and educational use areas at each edge” in ways that “respect the historic context” of neighborhood or campus elements. The MIMP requires this committee to prioritize these guidelines (B1.1.2 of Appendix H of the MIMP) in our evaluation of this project.

The proposed design substantially alters the front façade with the change of the materials and patterning at the mid-level, the elimination of the café and its transparent glazing, and the elimination of the loading zone that provided for a level entry to the lobby which did not require a separate handicapped entrance to the lobby. The net result of these design/function changes is that the building is significantly less inviting as a neighborhood feature and significantly more institutional and blander in character. The color palette of the entire building is unpleasant and

discordant. The corten steel finish clash and the dark metal details of the overhang create an overall heavy feeling, resulting in a façade that is neither welcoming nor warm.

The committee expects a higher level of design to complement this historic campus, but in a hotel chain where price point is a selling point and branding is central to these design changes, the project has come up short on many more MIMP guidelines and requirements than its earlier, more appealing and accessible, design.

1.1.3 Street Frontage Edge

The first-floor awning in the outdoor seating area provides a nice functional outdoor space along the street front and serves to break up the street level façade. The use of low-level lighting is appreciated as it will limit the light impacts on neighboring properties. We encourage the project team to include benches at the street frontage, either in the Right-of-Way or between the property line and the building.

The awning on 16th Ave is preserved though its design functionally is undermined by the other design changes to the first level. The main entrance is underneath the awning and there are three seats on the hotel guests' entrance patio. The south portion of the awning provides cover for three private patios which are accessible to each of the 3 'extended stay' units on the ground floor. These private patios undermine a previously inviting design that provided a neighborhood amenity in the form of the café and outdoor patio seating and significant interaction between the hotel and the pedestrian level. The ground level "extended stay" residential units with the large concrete retaining walls create a hardened, off-putting relationship to the street, and cloister guests from the neighborhood. The landscaping features that previously softened the relationship between the building and the sidewalk have been substantially reduced and replaced by minimal planting and shrubs in the concrete planter. The green screens that mitigated the retaining walls have been eliminated.

The committee appreciates the applicant's inclusion of two benches along the sidewalks on 16th and Jefferson (one on each frontage).

By raising the entrance off the sidewalk, the entrance requires more space and construction for ADA accessibility. With the loss of the café and outdoor patio seating and the redesigned lobby layout, there is significantly less public space inside the building and very limited usable outdoor public space that connects the building with the pedestrian and street levels. Placement of short-term bicycle parking on the guest patio south of the main entry further restricts guest enjoyment of the outdoor space by removing a secondary access door to the patio and instead requiring guests to squeeze narrowly past the parked bikes to access the shared outdoor space.

1.1.4 Connection to the Street.

The proposed pathway between the street and building adjacent to the building entrance on 16th Ave provides a clear and accessible physical connection between the street and building. The street level windows provide a visual connection between the street and building interior.

The 16th Ave entrance appears wider, with divided access with steps to the south and a level (ADA accessible) entrance to the north that clearly connects the street to the building. But the redesigned lobby, elimination of the café, and significantly reduced glazing means there will be significantly less interaction with the pedestrian level and less interactivity of the hotel's previous publicly available spaces. The Jefferson St pedestrian access leads to the basement.

1.1.5 Public Entrances

The way the building is situated on a hill lends itself to a single primary entrance. The service entrance in Jefferson is appropriately downplayed and differentiated. The committee recommends a color or material transition at the sidewalk to alert pedestrians to the vehicle crossing (as allowed by SDOT). The right turn only sign, roll-gate, and appropriate alert signals (during daylight hours only) for the garage entry are important and should be maintained.

The main public entrance is no longer a seamless, universal design that accommodates all guests equally. Rather, the entry section is now bifurcated, with a separate ramp off to the side for mobility-impaired guests, those with suitcases, or anyone else for whom stairs pose a barrier. The entrance that separates the general public from people with mobility challenges creates a sense of 'second class citizenship' that should not be present in modern day design. It also forces people in need of accommodation to make twists and turns to enter the building.

Short-term bicycle parking has been added to the project, but now is located directly next to the main public entrance door, further limiting views in and out of the lobby, and not in alignment with the committee's earlier recommendation for placement in the right-of-way, if allowed, in order to provide benefit to the community as well as hotel guests and staff. There is a new, smaller public entrance on Jefferson, consisting of a small stairway leading to the basement gym. The service access in Jefferson is significantly narrower and more unobtrusive, as it no longer provides access to any parking.

The applicant has failed to "design public entrances to include elements that engage and emphasize the pedestrian experience, including increased transparency," as required by B1.1.5 of Appendix H of the MIMP.

1.1.6 Streetscape and Pedestrian Pathways

The committee recommends benches or other seating located along E Jefferson either in the planting strip or between the sidewalk and the site wall (with the acknowledgement that seating design should not encourage loitering). Benches are particularly important as the hotel may include medical patients in a fragile medical state.

The committee recommends bike parking rack(s) in the right-of-way for general public use if allowed as part of the Street Improvement Plan.

The project does not include aspects of the Health Walk described in the MIMP as bordering the MIO.

The awning provides cover for outdoor seating for 3 chairs behind a small section of the site wall. The committee recommended bike racks in the right-of-way, if allowed, but the proposal moves bike racks to the main entrance, under the awning.

There is no element planned on this site for the Swedish Health Walk, which was supposed to be an important feature of the campus, as described and required in the MIMP for buildings on the perimeter of the MIO. We expect the developers to acknowledge this required design element in the MIMP and ensure this project's hardscape and landscape details can accommodate, and would not preclude or obstruct, construction of the Health Walk perimeter walking system/path, as described in Figure B-16 (Development Standards), pg. 43 of the MIMP.

The modification of the drop off/pick up zone that crossed the landscaped area east of the sidewalk on 16th Ave reduces the connection to the street. This area is composed of pavers, which could present difficulty for people with mobility impairments. The change from the previous design in the landscaping directly in front of the hotel on 16th Ave between the building and the sidewalk, including reductions in the landscaping treatment in the planters/retaining walls, hardens the experience of entry, as well as making the entire area more bland and uninviting to the pedestrian and hotel guest. The landscape plan in the planting strip, as outlined on sheet LA 101, protects existing trees while adding additional new trees. Beyond the tree canopy, the landscaping plan is varied, attractive and appears to meet the MIM guidelines, assuming it is maintained properly. The benches along the 16th Ave and Jefferson frontages are welcome additions to the streetscape.

The canopy wrapping around the building seems to be solid, but MIMP guidelines encourage the use of transparent or translucent materials to maintain solar access. The committee strongly recommends these improvements to ensure greater visibility and lighting into the site from the street.

1.1.7. Sidewalks

The committee does not feel that sidewalk overhead weather protection is required or appropriate at this location. The low-level landscape lighting as proposed should minimize light impact on neighboring properties and should be maintained.

The sidewalks meet the City minimum requirements but provide no enhancement to the pedestrian experience. There is significantly less variety and attention to detail in the

landscaping between the building and sidewalk level, and there seems to be no landscape lighting included anymore.

The committee notes that MIMP requires curb bulbs at the NW corner of Jefferson & 16th as part of development and would expect to see that included in the design plan, even if SDOT is responsible for construction.

1.1.8 Parking and Vehicle Access

See 1.1.5 for comments about vehicles crossing the sidewalk. Although the meeting minutes show an SDOT request for parking access from 16th the project proposes a garage entrance on Jefferson. The committee recommends that the Master Use Permit approval include a condition that exiting from the parking garage be right-turn-only, as proposed by the hotel design team.

The hotel's parking garage must be included in the campus-wide dock management plan required by the MIMP as it includes service vehicles as well as guest parking.

The committee is concerned that the limited amount of parking provided in the building is not sufficient for the number of anticipated guests. We strongly encourage overflow parking be provided in Swedish parking lots given the limited garage capacity of the hotel.

Inadequate parking access for Swedish Cherry Hill staff and patients has been a decades-long complaint by neighbors and previous SACs. Though the committee already noted concerns with the previous plan's limited parking, now there is *no* parking included in the redesign. This is a significant change in the hotel proposal, not just from a design perspective, but also from an institutional use and neighborhood impact perspective.

The architect stated in 2023 that the owner had "started" conversations with Sabey about a shared parking agreement for use in the adjacent garage. While we do not know the status of an agreement, and it is true that the MIMP allows an expansion of that garage, the intent of that expanded parking garage is for patients and staff – not hotel guests. The committee recommended hotel *overflow* parking in Swedish lots but never imagined that *all* parking would be provided by the hospital/Sabey.

This is a significant change in the proposal that the committee – as well as many community members who submitted public comment - has serious concerns about. The MIMP constrains the total amount of parking space for Swedish and its tenants. We strongly believe a hotel business within the institution's MIO should provide its own parking for its guests and staff, not take up the limited parking available for Swedish's patients and staff.

It should be noted that the Swedish Cherry Hill MIMP planned for a hotel to be considered in the final phase of the 20-year MIMP, well after significant expansions in hospital, medical offices, and parking construction. By proposing a hotel in the MIMP's earliest construction phase, there

has been no additional parking capacity added to the hospital or its campus to absorb hotel needs.

1.2 EXTERIOR SPACES

1.2.1 Statement of Intent

See comments below.

1.2.2 General Guidelines

See comments below.

1.2.3 Pedestrian Amenity

The walkway across the planting strip is appropriately sized and creates a pleasant pedestrian pathway. The committee recommends public benches be provided either in the right-of-way or between the sidewalk and the building. The large awnings over the patio along with the large amount of glazing at the first floor create a transparent and interactive experience at the pedestrian level. The committee believes the subtle, small scale hotel signage is appropriate for the residential neighborhood and should be maintained.

The glazing is significantly reduced, which reduces the interactive experience at the pedestrian level, and cloisters hotel guests from the neighborhood.

Other than two benches, there are no pedestrian amenities like art or pedestrian-scale lighting in the drawing.

The proposed hotel signage locations #1 and #2 are overwhelming and out of place for a residential neighborhood. The sign location #3, at pedestrian level, should be the only allowed placement; it should be subtle and small-scale, as was originally proposed in the earlier design plans. Any large signage could be construed as changing the nature from identifying the hotel for hospital patients and their families to marketing to the general public.

1.2.4 Screening guidelines

The proposed plantings between the sidewalk and the building have a residential scale that the committee feels is appropriate at the border of the MIO. Raising the outdoor seating area above the adjacent sidewalk mitigates the need for additional screening elements. Patio railing provides secondary screening. The committee is concerned that the planted screens at the concrete plinth will need special attention to grow properly and remain visually attractive.

The architect mentioned in January 2023 that the proposed landscaping is “in response to the committee” but the plan is significantly more simple, less landscaped, and less of a residential “garden” effect on both 16th Ave and Jefferson. The increased visibility of concrete retaining walls along 16th Ave and Jefferson make the overall design significantly more institutional and less residential than the previous design, for which the committee specifically commended as

appropriate for the MIO border. The new design seems to confuse “screening” with retaining walls. The elimination of the green screens and substantial reduction of landscape treatment and use of retaining walls create a concrete, hard edge. The previous 16th Ave ground level facade had used a light see-through railing to the outdoor café seating which served as screening and provided a softer edge and greater relationship to the street. The previous design used green screens to mitigate the concrete retaining wall. The current design instead uses more concrete and retaining walls to provide a barrier to the new ‘residential’ units on the ground level. This is a significant and unfortunate departure from the previous design.

1.2.5 Lighting, Safety and Security

The landscape design and first-floor transparency provide clean lines of sight that allow visual security at the building perimeter. The committee is concerned about safety at the west and north sides of the building and recommends the design team to continue working with Swedish/Sabey to ensure these areas are secure. The committee recommends that SDCI evaluate the final proposal for compliance with the guideline requiring buildings be equipped with interior lighting with automatic shut-off times and that automatic shades are installed where lighting is required for emergency egress. This is particularly relevant on the first floor adjacent to East Jefferson Street as it faces a residential neighborhood. Consolidated entry points for the building contributed to safety and security.

The revised first floor plan provides significantly reduced transparency overall and less clear lines of sight for visual security around the building perimeter, especially from the sidewalk.

The previous design provided both downlighting and subtle landscape lighting, including pedestrian level light poles integrated in the landscaping. These have all been eliminated in favor of ambient wall/railing mounted lights that do little to enhance the pedestrian experience. The previous lighting proposal enhanced the character and sense of safety. The current design provides no such character nor a sense of safety. The entire 16th Avenue between Jefferson and Cherry including the hotel, the adjacent parking garage and the emergency entrance to the hospital creates a generally more institutional and bland environment. The proposed entry/first floor appears to use darkened glass along with a dark, non-transparent canopy, which is foreboding instead of welcoming.

The placement of short-term bicycle parking on the guest patio further limits visibility into the lobby. It is unclear whether the applicant utilized “Crime Prevention Through Environmental Design” principles as guidelines in developing the project, as required by the MIMP (Section B1.2.5, Appendix H).

1.2.6 Artwork

The committee encourages the design team to identify additional opportunities for exterior artwork. While the hotel logo is artful, the committee recommends the design team investigate resources for artwork that reflects the cultural history of the neighborhood. One possible resource is the Central District Forum for Arts and Ideas and WA Na Wari.

The revised presentation shows no “artwork integrated into publicly accessible areas of buildings and landscaping that evokes a sense of place related to the use of the area” as required by the MIMP (B1.2.2, Appendix H)

The integration of artwork is not simply a suggestion but is an integral part of the MIMP with the intention that the integration of art can mitigate an institutional environment, while speaking to the character of the community.

B1.3 LANDSCAPE

B1.3.1 Statement of Intent

See comments below.

B1.3.2 General Guidelines

The committee is concerned about the viability of the green screen against a concrete wall but feels it can be successful if properly maintained.

The committee is discouraged that the new plan relies on exposed concrete walls and hardscape to create visual boundaries, where the previous plan used more planting areas, screening and more color, texture and plant variety. The result is colder, more institutional and less in keeping with the residential context of this highly visible corner. Having less organic material and more concrete, especially on this corner with intense sun exposure, is more likely to create a heat oasis, rather than a landscaping plan that could mitigate higher temperatures. The committee recommends a design that uses less hardscaping and more open, transparent materials than concrete walls to create barriers and boundaries. The committee does not believe the revised plan comports with the General Guidelines for the entire MIMP, which require a project to “use landscaping to soften and enhance outdoor spaces and screen utilities and other more functional elements” (pg. 148, General Guidelines).

B1.3.3 Planting Guidelines

The plant selection reflects a residential neighborhood garden that the committee feels is appropriate for the building’s location at the perimeter of the MIO.

Street trees along E Jefferson street should be maintained or increased to provide a transition to the neighborhood and screen noise and light.

The committee strongly urges the designers to maintain the original landscaping plan, which was charming and presented more like a residential garden and showed an appreciation of its

residential surroundings. The revised plan's hardscaping (i.e. extensive concrete retaining walls) echoes the linear, rectangular design of the building, rather than the softer, more organically designed plantings that had counteracted the institutional impact of the large building. The plant selections proposed for the retaining walls/planters are mundane and appear to be designed strictly for being easily maintained. They are institutional and lack a sense of character. The plant selections in the planting strip are more varied and creative. The rest of the landscape should take its cues from the character of the planting strip that feels more like a garden.

B2.0 ARCHITECTURAL CHARACTER

B2.1 Height, Bulk and Scale

B2.1.1 Statement of Intent

See comments below.

B2.1.2 General Guidelines

The stepped building minimized the bulk of the building.

The planned upper-level patios on Level 4, as well as guest room windows on Levels 2-6, directly face private residences on Jefferson St. The MIMP explicitly requires new development to "design fenestration (windows) and balconies or other outward looking features to minimize viewing from the campus buildings into adjacent residences." (B2.1.2, Appendix H)

Rather than protecting privacy, the applicant should reconsider the design of the patios as landscaped green roof that includes some vegetation that can act to modify views into the neighboring residences and eliminate guest access to the area.

B2.1.3 Architectural and Façade Composition Guidelines

The committee is concerned about the blank facades on the north and west sides of the building and does not feel the design meets MIMP guidelines for addressing large blank walls. This is a particular concern given the uncertainty regarding future buildings at the north and west. The "framed" composition at the north and west mitigates the large blank façade. However, the committee is concerned about the effect of weather on the west façade particularly if the façade composition relies primarily on painted materials. The committee recommends additional depth and articulation provided by projecting elements if the building is not located directly on the property line.

The proposed design substantially alters the front façade with the change of the materials and patterning at the mid-level, the elimination of the café and its outdoor patio seating and its transparent glazing, and the modification of the loading zone that provided for a level entry to the lobby which did not require a separate handicapped entrance to the lobby. The net result of these design/function changes are that the building is significantly less inviting as a neighborhood feature and significantly more institutional and bland in character. The design revisions do nothing to mitigate earlier concerns about some the highest level of design

guidelines in the MIMP - to “eliminate blank walls” and “use a compatible palette, texture and color to unify the hospital campus” (pg. 148, General Guidelines).

The color palette of the building responds more to the Candlewood Suites brand than to the neighborhood context and the MIMP. The ochre and gray checkerboard type pattern feels dated already and does not have a sense that it is a design that will age well, nor is the building material using “a compatible palette, texture and color” that unifies the hospital campus. The design guidelines encourage the applicant to take cues from traditional materials used in the neighborhood and campus buildings, i.e. the “historic context” of this campus and neighborhood. Using new townhomes south of Jefferson as a design touchstone is tone deaf and does not reflect the design references in the Cherry Hill MIMP (see pg. 148 for neighborhood examples of the General Guidelines).

The one change in response to the only major significant design concern by the committee previously about two blank facades is now a section of the west wall is slightly recessed for “shoring” between the two stairwells. The revised plan describes “minor pattern change” for the composite wood panels on both the north and west facades, but those changes seem to be larger panels, creating even more blank sections and less visual relief than the original design. In response to earlier committee feedback, the material is now wood composite rather than the previous smooth fiber cement panels.

The north and west facades are adjacent to the two parking garages. Typically, blank facades are left when it is anticipated that a building will be built directly adjacent. In this case, it is unlikely that either garage will be replaced in the foreseeable future with taller structures. The simplified pattern of the material and color does nothing to mitigate the blank facades which will be viewable from blocks away from the proposed hotel. Had the hotel been built when it was anticipated in the MIMP - at the end of the 20 years build out - it would be likely that these two facades would not be visible, because the parking structures would have been expanded by then. At this point, the north and west facades will be seen for years to come, and the current design does not respond appropriately to MIMP guidelines which require buildings to mitigate blank walls. The committee suggests the applicant could integrate artwork into the facades to eliminate the blank walls and also comply with MIMP requirements for artwork that reflects the local character and neighborhood context.

On the south and east façades, corten steel with a rusted finish is now used on the ground floor as well as the next two stories. This provides a richer color palette and a more textured material, more in keeping with the traditional brick used in many of the historic buildings on campus and in the neighborhood – yet the elimination of the detailing of the second and third floor sections results in a boring design and a more institutional feel.

B2.1.4 Secondary Architectural Feature Guidelines

The entry canopy serves the dual purpose of providing cover at the entry while also adding depth to the façade. The stepping of the upper levels away from the street and wrapping the weathered steel type material successfully modulates the east and south facades. The project represents a “base”, “middle” and “top” as directed by the design guidelines.

The design does not demonstrate an architectural style that reflects the neighborhood buildings.

In the new design, the first-floor canopy is continuous in such a way (i.e. equally providing cover over private rooms and the entrance) that it fails to signal clearly where the public entrance to the building is. The addition of steps at the front entrance in lieu of a continuous level sidewalk is undesirable from a functional and aesthetic point of view. The orange-doored electrical utility at the northern end of the west façade sticks out beyond the canopy area and is a featureless addition that should not be prominent on the front façade. In the meeting, the project architect said it could be painted another color to better blend in; the committee requests the applicant do so. Regardless of the color, this bump-out on the building apparently is required by the fire department, so should be more thoughtfully designed and integrated into the front facade.

B2.2 ARCHITECTURAL ELEMENTS AND FEATURES

B2.2.1 Statement of Intent

The design team has intentionally employed materials (weathered steel referencing brick, etc.) that reference the existing campus but are not the same materials as used on the existing campus buildings. They have also referenced the façade divisions of some existing campus buildings by framing building windows through material variation.

The proposed design does not comply with the statement of intent of the original design and does not provide a cohesive look for the campus through the selection of colors. There is no relationship to existing/historical buildings, nor does it represent a contemporary design that would be complementary.

B2.2.2 Color and Material Guidelines

The committee supports the use of composite material in place of real wood panels for long term attractiveness and resistance to weathering but recommends a warmer “wood” tone in place of the Ash color. The committee also encourages the designers to provide additional texture for the composite boards to reflect the neighborhood character and minimize the flatness of large panels. This can also be achieved through breaking panels into smaller segments. The committee is concerned about the durability and quality of product installation for the long-term aesthetics of the building in the context of the neighborhood and campus.

The material that mimics weathered steel references the brick found on the campus and in the neighborhood, and its location on the first 3 floors is appropriate to the residential scale. The material provides visual depth that the committee would like to see extended to the other materials.

The change of pattern on the second and third levels reduces the level of interest in the building design. The 'checkerboard' pattern of alternating colors in the upper levels is seen all over Seattle in new apartment buildings. Unfortunately, it has become a mundane and predictable design approach. The MIMP design guidelines require a project to "acknowledge the character of single family residential, multifamily and educational use areas at *each edge*" of the MIO (pg. 148). The MIMP requires projects to integrate with the whole of the campus and the neighborhood, not just what is visible from one corner, and this is especially important for this project, which is on the edge of the MIO itself, directly interacting with the residential neighborhood. The materials and palette do not adequately acknowledge the context for this project.

B2.3 ROOFTOPS

B2.3.1 Statement of Intent

It is unclear if the rooftop decks will be publicly accessible or limited to hotel guests only. The committee recommends that if the rooftop garden is publicly accessible restricted hours noise levels as appropriate for a residential neighborhood should be enforced.

The only roof deck that apparently remains on this project is the general roof deck on level 4, along with private roof decks for several rooms on the same level. For reasons mentioned earlier, the portion of the deck facing Jefferson is inappropriate and violates the privacy of private residences on Jefferson by directing campus views into their homes and yards. This is in direct contradiction with the MIMP and should be removed or appropriately mitigated. The committee recommends that these be replaced by green roofs with plants that can provide some screening of views into neighboring residences across the street in compliance with MIMP guidelines. s

B2.3.2 Rooftop Design Guidelines

The division of the rooftop deck into smaller, intimate spaces will discourage noise from large gatherings while creating unique experiences at each space. The committee appreciates the low downlighting to minimize light pollution and impacts to neighboring properties.

The original roof deck at the top of the structure was inviting and designed to create an enjoyable, hospitable public space as part of the hotel, with a rooftop garden and plantings to soften the edges. However, it appears to have been removed and there will be no access for the public. All of these are significant changes to a design and functional element that was originally described as an amenity for the neighborhood (and guests). Although a public roof deck would have been a valuable amenity for guests and residents alike, the removal of this feature removes conflicts with protecting the privacy of nearby neighbors. The floor plan shows landscaped areas but does not indicate patios or seating.

SECTION THREE – COMPLIANCE WITH TRANSPORTATION REQUIREMENTS:

When the City Council approved the MIMP, the City Council added several transportation-related conditions that must be completed as part of Master Use Permit reviews for each project completed under the MIMP. These conditions are outlined in the Council Findings Conclusion and Decision (CF311936) and are binding on the MIMP. Some requirements must be completed by the Applicant, some must be completed by Swedish Cherry Hill, and others by SDCI and/or SDOT. As outlined below, many transportation-related conditions contained in the MIMP have not yet been met, or were studied when the hotel contained a cafe, on-site parking, and higher room count.

Because these significant project elements have changed, the committee asserts that SDCI must either deny the MUP for non-compliance with MIMP Conditions listed below or cannot yet issue a decision on the Master Use Permit until the Applicant, Swedish Cherry Hill, SDCI, and/or SDOT complete their required reviews and analysis using accurate data and project assumptions reflective of the redesigned project.

Condition 6 - TRANSPORTATION MANAGEMENT PROGRAM (TMP) REVIEW

This condition stipulates that as part of the Master Use Permit review process, SDCI shall “assess TMP performance and apply updated TMP elements” for any projects completed under the MIMP. Specifically, Council references SMC 23.54.016 C6 in their findings, which states that applicants “shall present evidence that it has made substantial progress toward the goals of its transportation management program as approved with a master plan, including the SOV [single occupancy vehicle] goal.”

A careful review of the MUP application shows no contemporary evidence has been provided by the Applicant that substantial progress towards the goals of the Swedish Cherry Hill Transportation Management Program. The most recent data provided by the Applicant is the 2019 CTR Data, which is now out-of-date and cannot be used to determine compliance with the TMP today. The SDCI Director must, according to Condition 6, assess TMP performance using the most recent data available (the 2022 CTR Survey) as part of their review. This committee reminds SDCI that if “substantial progress” has not been made, they are required under SMC to consider taking a range of actions, including denying the permit. Additionally, Condition 6, requires “[applying] updated elements” when the TMP performance is not achieved.

SDCI determined that the project’s vesting date for the hotel application (i.e. when Perfect Wealth’s application is considered “complete”) is January 25, 2021. In 2021, the SOV goal under the MIMP was 46%, and at the time of vesting, the most recent Campus CTR survey indicated the SOV rate was 47%. All project applications subject to the TMP must demonstrate “substantial progress” is being made towards the TMP at time of permit approval - not simply at

the vesting date. At the March 13, 2024 IAC meeting, [SDOT's presentation to the committee](#) shows the SOV rate for Swedish Cherry Hill is 57% as of 2022.

In City Council's May 2016 report of its MIMP findings and recommendations, based on CAC SOV recommendations, finding #92 states the "CAC majority recommended a condition that would require Swedish Cherry Hill to **demonstrate continued compliance with its SOV goal prior to issuance of any building permit...** The DPD [SDCI] Transportation Planner cited **the Department's existing authority under SMC 23.54.016.C.6.c to deny a permit** for development included in a MIMP if previous efforts have not resulted in sufficient progress toward meeting the major institution's SOV goals. He testified that like any other major institution, Swedish Cherry Hill will be required, as part of a project application, to **demonstrate that it has made substantial progress** toward meeting the TMP goal in effect **at the time of the application.**"

The data presented to the IAC show 2022's **57% SOV rate** does not constitute in any way "substantial progress" towards the goals of the TMP, nor does it meet the underlying assumption of continued compliance with its SOV goal prior to issuance of any permit. While the SOV rate in 2021 may have been on track to meet Swedish's goals when SDCI determined the Applicant's "locked in" vesting date for its *application*, now that SDCI is considering whether to issue a permit, the IAC strongly urges SDCI to consider the institution's significant backsliding on its SOV rates – and the Department's own assertion to City Council that it would take this issue seriously in considering not just project *applications*, but also project *permits* for Swedish Cherry Hill.

Yet at the March 13, 2024, IAC meeting, in response to committee questions about SOV rates and compliance with the TMP, Gordon Clowers from **SDCI called the TMP an "aspirational document" and described the SOV goals as "aspirational."** **This fundamental mischaracterization of the MIMP, City Council intent and state law is deeply concerning to the committee.** It raises serious doubts about how SDCI has considered transportation as a critical element in Swedish Cherry Hill's expansion under this MIMP and its intent to comply with a set of major implementation policy issues with this institution.

The CAC and subsequent implementation committees, as well as community members, frequently raise the issue of the institution's history of zero progress on SOV rates under the previous MIMP. In 2020, Swedish disbanded the Integrated Transportation Board created after this MIMP was enacted; it is also not whether "all tenants on campus have been provided a 100% transit pass subsidy" as required by the MIMP (City Council finding #84) when the institution is not meeting its SOV goals.

The IAC believes the SDCI Director must take seriously and urgently his job to consider the compliance by Swedish Cherry Hill with *all* its TMP obligations, especially, but not exclusively, meeting its SOV rate goals, when making a decision about a permit for this

project. We believe SDCI must evaluate achievement of the SOV rate using the most recent 2022 CTR data available at the time a decision on the MUP is issued. The options outlined in SMC include updating elements to the TMP as well as denying a permit - the option recommended by the CAC and endorsed as a fair and equitable option by SDCI to the City Council.

Condition 11- CUT-THROUGH TRAFFIC EVALUATION AND MITIGATION

This condition states that each master plan project “shall include an analysis of the existing and projected cut-through traffic impact on non-arterial streets related to employee, delivery and visitor vehicles.” The transportation analysis must study a specific area defined by the City “based on the development phase and potential impacts to non-arterial streets.” If cut-through traffic impacts are identified that could worsen as a result of the project, proportionate mitigation steps defined in this Condition must be taken.

According to Applicant’s “Correction Notice #1 Response” submitted on 8/3/2021, Applicant’s Traffic Engineer relied solely on a 3rd party study completed in 2018 for an unrelated project within the MIMP, which is not permitted by this condition. Applicant’s “Traffic Memo” submitted on 6/13/2023 did not address nor did it correct this deficiency with original studies.

Applicants must complete their own analysis and study a specific area defined by the City before the MUP decision can be issued.

Condition 16 - CAMPUS-WIDE DOCK MANAGEMENT PLAN

This condition required “an evaluation of truck access and loading berths, and an evaluation of means and methods to ensure relevant Seattle noise regulations are met.” Applicant has not conducted such an evaluation since the final Dock Management Plan was submitted to SDCI & SDOT in 2020.

SDCI must complete an evaluation of truck access and loading berths, and an evaluation of means and methods to ensure relevant Seattle noise regulations are met as part of this project.

Condition 20- UPDATED PARKING, LOADING AND ON-CAMPUS CIRCULATION PLAN

This condition requires Swedish Cherry Hill to “provide an analysis of impacts of parking driveways, loading and service area drives, and pick-up/drop-off areas on pedestrian and vehicular flow on the surrounding sidewalks and streets.” Although Applicant’s “Traffic Memo” submitted on 6/13/2023 addressed the removal of the on-site parking garage, cafe and reduction in rooms, this analysis can only be provided by Swedish Cherry Hill according to the MIMP and may not be provided by a 3rd part (such as Applicant).

Following the analysis, “appropriate design measures shall be identified and implemented to avoid adverse impacts to pedestrians, bicyclists and motorists,” and both the analysis and plan shall be provided to the IAC for review and comment concurrent with City’s review.

Given the removal of the on-site parking garage, cafe and reduction in rooms Swedish Cherry Hill must provide an updated analysis in accordance with Condition 20 and submit for IAC review and comment before an MUP decision is issued. Applicants may not provide such an analysis to the City or IAC.

Condition 22 - TRANSIT CAPACITY ANALYSIS

This condition requires Applicant to conduct “an analysis of the impact to public transit ridership on King County Metro Routes that travel within ½ mile of the institution.” Once again, Applicant did not conduct their own Transit Capacity Analysis, but relied solely on a 3rd party study completed in 2018 for an unrelated project within the MIMP, which is not permitted by this condition. Given the removal of on-site parking, an increase in transit ridership resulting from this development is reasonably expected compared to previous iterations of the project.

Furthermore, in the intervening 6 years since the 3rd party study was completed in 2018, King County Metro has significantly changed their route network and frequencies serving the Swedish Cherry Hill Campus, necessitating a new analysis reflecting current conditions.

Applicants must complete their own transit capacity analysis to determine what mitigation (if any) is required before an MUP decision can be issued.

Summary Recommendation:

In summary, the IAC strongly recommends SDCI deny a permit for Candlewood Suites at Cherry Hill (Project #3025500-LU). We find that the hotel project does not meet the requirements laid out by the City – both in the Seattle Municipal Code governing Major Institution Master Plans and in the Swedish Cherry Hill MIMP.

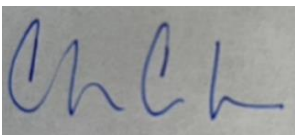
This project is not “functionally integrated with, or substantively related to, the central mission of the Major Institution,” per SMC 23.69.008.B, nor does it meet the specific MIMP requirement for Swedish Cherry Hill to serve “patients and their families”. As such, this project as proposed should not be permitted.

Additionally, in our review of the revised design for the hotel, the IAC strongly objects to the design changes made from the original Sanctuary Hotel proposal and which do not conform to the Master Plan Design Guidelines listed in Appendix H of the MIMP.

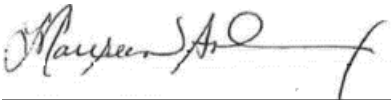
Swedish Cherry Hill IAC Members include:

- Claire Lane – Approve
- Maureen Devery – Approve
- Catherine Koehn – Approve
- Kevin Heim – Approve
- Ellen Sollod – Approve
- Kathy Yasi – Approve

Sincerely,



Claire Lane (Chairperson)



Maureen Devery (Vice-Chairperson)