Public Resource Center
Seattle Department of Construction and Inspections
Via email to PRC@Seattle.gov

cc: Michael.Dorcy@seattle.gov

Re: Project 3020114 6726 Greenwood Avenue North

This letter documents our major concerns with the developer's parking study for 6726 Greenwood Ave. N. The study was completed by Gibson Traffic Consultants (GTC) in November 2015 but only made public on March 22nd.

**Issue #1 – Determine the Capacity of Parking.**

The first comment for this issue is that the developer's study on page 7 (section 6.2) determines the current calculated parking capacity using a factor of 90% of the inventory of legal parking spaces. The study sites the Urban Land Institute figures of 85% to 95% for this calculation. Seattle's Tip 117 recommends using 75% for this calculation. There is a significant difference between using 90% and 75% of inventory for this calculation. The parking study should be redone using the 75% capacity figure.

The second comment concerns inconsistencies with how the developer's study uses this data. On page 8 (section 6.3), the study states that the current calculated capacity is 253 stalls and uses the 253 stalls to determine the available number of parking spaces in the study area. The study also uses 253 stalls (on page 9 section 6.4) to determine the parking supply available. Then on page 10 (section 6.5 – table 5), the study uses inventory of legal parking spaces, which it states is 281 stalls, to determine the parking utilization percentage for both situations, with and without the development. We believe that the more accurate number for parking capacity is the calculated parking capacity (Note – there is a similar inconsistency on page C-2).

The third comment is that on page 9 (section 6.4) the study states that there are no planned street projects in the study area that will permanently reduce the on-street parking in the future. However, the Adopted Seattle Bicycle Master Plan network map depicts a cycle track along Greenwood Ave. N. and Phinney Avenue in the study area that will, when implemented, eliminate the parking on one side of the arterial. The parking capacity should be recalculated with the removal of on-street parking for the length of the cycle track.

**Issue #2 – Determine the Number of Cars Utilizing the Parking Capacity.**

The first comment concerns a deficiency in the developer's study methodology – determining the period of peak parking demand. Generally parking characteristics are divided into three distinct times of the day: midday (approximately 9:00 am – 3:00 pm), evening (approximately 7:00 pm – 10:00 pm) and overnight (approximately 12:00 midnight – 5:00 am). The developer assumes on page 8 (section 6.3) that the peak demand for this study area is the overnight hours. Because the on-street parking supply is used by both residents and commercial customers (in particular the many restaurants in the area) we believe that the peak demand for parking in the study area is in the evening.

The second comment concerns inconsistencies with the actual count. On page 8 (section 6.3) the study states that the average number of parked cars was 204 cars. On page 10 (section 6.5 – table 5) the study uses a number of 217 parked cars to determine parking utilization (Note – there is a similar inconsistency on page C-2).

**Issue #3 – Determine the Demand for Parking from the Proposed Development.**

The first comment concerns the inconsistent application of the King County Right Size Parking Calculator to determine parking demand created by the development. On page 10 (section 7) the developer's study uses a factor of 0.49 parking stalls per unit to determine residential parking demand created by the development. However, on page C-3, the study displays a print out from that program of 0.78 parking stalls per unit. The Institute of Transportation Engineers has produced various studies that estimate the demand for low/midrise apartments in urban areas. The amount of residential parking demand created by developments is between 0.80 parking stalls per unit and 1.2 parking stalls per unit. We believe the developer's study underestimates the amount of parking

demand that will be created by the development. We questions the underlying assumptions about car ownership and thus parking demand used in the developer's study.

In addition, the proposed development will eliminate seven parking spaces currently located behind the existing businesses at the site. Since this commercial parking demand will not be otherwise provided, the proposed development will create an on-street parking demand for these displaced parking spaces, which the developer's study does not account for. Please identify the section of code that would excuse the developer from providing any off-street parking for its proposed commercial uses.

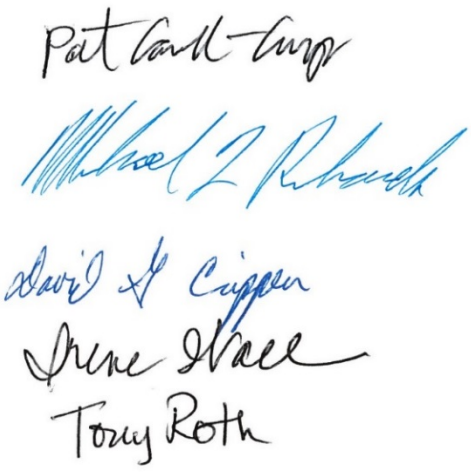
**Issue #4 – Cumulative Impacts on Street Parking.**

Future demand within the study area is addressed on page 9 (section 6.5). The developer's study does not account for all the current planned development in the area, specifically the site at 6528 Phinney Ave. N., and the Oroweat site on Greenwood Ave. N. at N. 70th St. are not included. The property at 6701 Greenwood Avenue (former Francine Seders Gallery) is also likely to redevelop soon.

**Issue #5 – Reliance on King County Metro Bus Route 5 as Sufficient Parking Mitigation.**

While not explicitly addressed in the traffic and parking study, the developer's SEPA checklist refers to a reliance on the availability of transit as adequate mitigation for not providing any on-site parking. There is no information provided on the adequacy of transit to meet all the trip needs for residents in this development. King County acknowledges that the #5 bus is overcrowded now[1]. There is no discussion in the SEPA checklist about the cumulative impacts of increased ridership on the #5 bus. This is an unmitigated environmental impact since the problem of overcrowding increases as the busses proceed toward downtown Seattle. Already bus riders in southern Phinney and Fremont are often bypassed at their stops because of overcrowding. Route#5 may have *scheduled* headways of less than 15 minutes, but *in fact* it does not provide high capacity transit service through the Phinney Ridge neighborhood because overcrowding causes schedule delays in addition to creating a miserable bus commute during day and evening peak hours, which some of us experience on a regular basis. The addition of 55 units ostensibly dependent upon transit would only exacerbate this problem, something both the Environmental Checklist and the Traffic Study overlook.

Sincerely,
Members of the Phinney Ridge Community Council Parking Committee



**Committee Members**
Patricia Carroll-Crippen
Michael Richards
David Crippen
Tony Roth
Irene Wall – PRCC Board Member
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[1] The most recent King County Metro Transit Service Guidelines Report, Oct 2014, shows that Route 5 was added to the list of overcrowded routes. Route 5 ranks among the highest in terms of additional service hours needed to reduce crowding. There is no evidence that additional service hours have corrected the problem.