

Herbaugh, Melinda

From: Henry & Ava <henryava@comcast.net>
Sent: Tuesday, April 05, 2016 2:15 PM
To: PRC
Cc: Henry
Subject: Project 3020114 Comments
Attachments: 6726 Greenwood Ave MUP Parking Study.pdf; ATT00001.htm

I have attached comments regarding the Project 3020114 Traffic Study, 6726 Greenwood Ave N. I have been a resident of Phinney Ridge 1979-1992 and am again since 2005. I am not just an advocate of intelligently increased density in Seattle's urban villages, but also a participant in that movement living in the nearby Fini Condominium. Please add these to the project's SDCI documents list.

Thank you very much,

Henry Brandis
6801 Greenwood Ave N #108
Seattle, 98103

Brandis re Project 3020114. 2016/04/05

Comments regarding the Project 3020114 Traffic Study, 6726 Greenwood Ave N. I have been a resident of Phinney Ridge 1979-1992 and am again since 2005. I am not just an advocate of intelligently increased density in Seattle's urban villages, but also a participant in that movement living in the nearby Fini Condominium.

I wish to thank SDCI in advance for allowing an extension of the comment period for this project MUP application, particularly since the developer's Traffic Study posting was delayed so long. Obviously parking is one of the major issues for this proposed development and a reasonable time for review and comment is necessary.

Summary

These concerns are provided in advance of any MUP evaluation decision after reviewing the Project 3020114 Traffic Study as listed online by SDCI. Conclusions are as follows:

The Traffic Study is inadequate in its scope and accuracy. Neither neighborhood specific issues nor the traffic and parking impact on many of the local businesses are addressed. Important peak usage times were not analyzed. Greenwood/Phinney neighborhood residents have performed their own traffic study, collecting considerably more data than the developer's consultant. The results of this alternate study need to be reviewed by SDCI.

Despite glossing over a number of pertinent and significant factors, **the report confesses that the proposed development will push demand over the 90% threshold** (see Table 5), even given the developer-favorable assumptions of the analysis. This threshold is already impractical for the southern portion of the Greenwood/Phinney urban village due to the steep topography and Greenwood Avenue congestion.

The report acknowledges that the development would require parking commensurate with the commercial space exceeding the SMC waiver threshold, but then just states the developer is not providing that. **This would be a violation of SMC 23.54.015.**

The report does not appear to address the 6-10 existing parking spaces behind the current commercial buildings that will be lost. The developer should be responsible for replacing these.

Greenwood Ave N itself will have additional further significant reduction in street parking and delivery truck space for business due to near-term future adjacent developments, e.g. Greenwood Ave N and N 70th Street. Further parking degradation and increased congestion will occur if dedicated bike lanes are enlarged as is currently being considered. This possibility should be included in decisions regarding new development parking provision impacts.

It is also important to remember that living on Phinney Ridge and taking the bus to work downtown or at the UW does not mean proposed apartment tenants will not have a car. Most will, and taking the bus to work simply means they will be occupying neighborhood parking spots all day during the workweek. This is why daytime impacts to parking demand are equally as important as night time, especially for business customer access.

MUP approval should be delayed until an impartial and more accurate traffic study can be provided by SDCI. The developer consultant's Traffic Study report is inadequate in scope, incorrect in several assertions, and glosses over negative attributes of the data collected which biases the results in favor of the developer.

I strongly recommend that those making a decision on this development's MUP visit the area to understand the impact of this type of housing here.

Please note that the developer has been unwilling to seriously engage with neighborhood residents to discuss design and impact issue resolution. This is despite two design reviews, an appearance a Phinney Ridge Community Council meeting, a meeting personally with a few neighborhood residents. The developer has been very disciplined at saying "No". Unfortunately this just underlines the fact that the developer has no interest in their project integrating into the Phinney/Greenwood community.

The developer has previously asserted there is not enough footprint area to allow any underground parking. However, an architect has produced a design that would allow 17 or 18 underground spaces. This was also provided in an earlier SDCI PRC comment. The developer also said No to providing any on-site ground-level covered parking, though this of course is quite feasible as well.

Traffic Study Detailed Comments

1. **Traffic volume data used for the study is from 2009 which is clearly not representative of traffic volume 7 years later given the recovery of the economy and significant increase in housing density in the immediate area.** It is even less pertinent to projections of traffic volume at the time the development might be completed.
2. Bus #5 is the only effective bus serving the area. Bus #82 only makes 2 trips in early morning and is not meaningful in terms of the overall service level.
3. **The trip distribution estimate in the report (Section 4.2) is misleading relative to the impact on neighborhood residential streets.** Many trips involving apartment residents will not originate or stay on Greenwood Ave N because there is so little available Greenwood Ave N parking and the apartment has no dedicated off-street parking. There will be more significant increases on neighborhood residential streets, particularly Phinney Ave N to the east and north of the apartment and on N 68th, N 70th, and N 67th to the east. N 70th and N 67th to the west, and Palatine will also see much more traffic as driver's have to search for parking. This is because cars will enter and exit to Greenwood Ave N as well as eastbound along the former streets down to Linden Ave in order to access Aurora Ave N and westbound down the latter streets toward Ballard.
4. **The Traffic Study Parking Analysis is flawed**, which results in bias favorable to the developer. Data collection time for the parking study was poorly designed and inadequately supported. **Two of the most important usage period times were not even studied.** One is peak afternoon/early evening when both returning apartment residents, other neighborhood residents, and local bar and restaurant customers will be competing for nearby spaces. The second is during the day when apartment residents who own cars are using the bus to get to work. Their parked cars, plus those of apartment building business workers and customers (including customers for live/work business units in the development) will be filling spaces already needed for existing businesses and neighborhood residents. Future planning for expanded bicycle lanes on Greenwood and Phinney Avenues is expected to further reduce local business parking opportunities.
 - a. 23.54.015 D.2 (ref Seattle.gov online SMC) does not appear to apply. It looks like D.1 was the intended reference. SMC Table B for 23.54.015 does provide for no required parking for residential purposes, other considerations aside. However, the study report itself states that 4 spaces would still be required due to the commercial units, and then flatly states none are being provided. **Allowing this appears to be a violation of the SMC. Please require modification of the proposed apartment design to include all required parking.**

- b. **The report does not address the 6-10 existing parking spaces behind the current commercial buildings that will be lost.** The developer should be responsible for replacing these in addition to other required parking.
 - c. **The Traffic Study Parking Analysis does not take into account extra *commercial* unit customer generation of traffic and parking utilization for the Isola condominium under construction on Greenwood Ave N just north of the proposed development.** Isola will have some underground parking, but that will be insufficient for residents and the businesses in that building (it will have considerably fewer spaces than the number of 1- and 2-bedroom units). The deficit of this estimate is larger if there are restaurant or bar businesses in the Isola development.
 - d. **Parking data was only collected late at night.** This assesses the impact only due to permanent area residents when businesses are not operating. It ignores the impact on businesses and residential homes when those uses resource areas overlap. Remember that many of the urban village businesses on Greenwood Ave depend on clients who arrive by car because they live too far away and public transportation to the area is along the north-south arterial only.
 - e. **The Traffic Study Parking Analysis asserts that parking utilization under a 90% standard is sufficient to be acceptable and not require additional parking to be provided. Note that the Table 5 summary states the proposed development will already push parking demand over 90%.** How far a walk after parking is acceptable, and how long driving around the neighborhood to find an available space? A meaningful parking study needs take into account that the many of the neighborhood parking spaces within 800 feet of the proposed apartment are down off Phinney Ridge to the east or west, resulting in a steep walk up to Greenwood Ave (100 to 130 foot elevation change). These parking spots should not be included as available parking even though within 800 feet. Note also that the Study states it used "horizontal" distance rather than walking distance for "ease of calculations". This creates an additional optimistic bias to the study results.
 - f. **The Traffic Study does not take into account the fact that the large property on Greenwood Ave N and N 70th Street has recently sold and development design has begun.** This will also add to the traffic and parking impact in the future. In addition, it is clear that additional development along the Greenwood Ave corridor will continue. MUP impact assessments need to take these factors into account.
 - g. I believe there is a multifamily development in work just south of the Phinney Neighborhood Association Phinney Ave building that will have approximately 10 living units and has no provided parking. This needs to be considered by the Traffic Study as well.
 - h. **The Parking Demand section also states the proposed development parking demand will be 29 spaces. This is incorrect. The study earlier in Section 6.1 Parking Code states the development demand should be 39 spaces. The 29 spaces are only the residential component.**
 - i. **Despite not including the above mentioned significant factors in their report, the report's summary of parking resulting from the inclusion of the demand shown in Table 5 shows the project will cause the 90% demand threshold to be exceeded. Approval of this project's abstinence from provided parking has no justification.**
5. **Because of these flaws in the Traffic Study new, impartial study should be required by the SDCI itself to insure that appropriate impacts are addressed as well as SMC requirements.**

Brandis re Project 3020114. 2016/04/05

Unfortunately the developer has chosen to not engage with the neighborhood to integrate their development into the neighborhood, choosing rather to push their business model onto an inappropriate area.

6. The report states the anticipated parking demand is for the site is 39 parking spaces. While the SMC may not (with proper justification) require this development to supply residential parking (29 spaces), a **MUP decision should take into account the commercial parking SMC requirement and how the development will actually impact this neighborhood and determine development changes appropriate for the actual site.**

Respectfully,
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