

Dela Cruz, Jeff

From: Irene Wall <iwall@serv.net>
Sent: Saturday, July 30, 2016 7:55 PM
To: PRC
Cc: Dorcy, Michael; Shaw, John
Subject: Project 3020114-6726 Greenwood Avenue North PRCC Comment Letter on REVISED Parking Study's Inadequacies
Attachments: Traffic Committee Comments on 6726 REVISED Traffic and Parking Study 73016.pdf

Please find attached the PRCC Traffic/Parking Committee's comments on the remaining errors and problems with the revised traffic study. We do appreciate that you issued a correction notice when the initial study proved to be less than accurate. However the revised study has not corrected the major problems and has created more internal inconsistencies

We would appreciate your response to these comments. Mr. Dorcy attended a public meeting about this project at the Phinney Neighborhood Center on July 25th (attended by 80 people) where many residents expressed their concern about the traffic, parking and pedestrian safety aspects of this proposed development and their immense frustration at the city's response to their concerns. The committee has focused our comments on the problems with the traffic study itself but we recognize that one of the underlying problems with this proposed development is far too many units with zero parking in a neighborhood where parking is already at the saturation point.

We certainly hope you exercise all the authority available to require meaningful mitigation for these impacts.

Thank you

Irene Wall for the Committee

July 30, 2016

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 **revised parking study for 6726 Greenwood Ave. N.** The revised study is dated June 24, 2016. The Phinney Ridge Community Council Parking Committee also commented on the developer's initial parking study, dated November 2015 and made public by the City of Seattle on March 22, 2016.

Issue #1 – Determine the Capacity of Parking.

In the developer's initial study, the number of legal parking spaces in the study area was determined to be 281 spaces. This amount is maintained in the revised study. However, in the initial parking study, there was a discussion of the concept of theoretical, or actual parking capacity occurring at a percentage of the physical capacity. The original study recommended that the actual parking capacity be calculated at 90% of the physical capacity. In our initial comment letter, we stated that Seattle's Tip 117 recommends that the actual parking capacity be calculated using the amount of 75% of the physical capacity. The revised study does not mention this concept of actual capacity as compared to physical capacity at all. We believe that the actual capacity should be used when determining parking capacity and when calculating parking utilization. We further believe that the actual capacity should be 75% of the physical capacity.

In addition, our initial comment letter pointed out that the future parking capacity in the study area would be reduced if the City of Seattle implemented a cycle track along Greenwood Ave. N. This project is currently in the adopted Seattle Bicycle Master Plan. The developer's revised study continues to ignore this potential impact on parking capacity in the study area.

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

In our initial comment letter, we stated that the developer's assumption that the period of peak parking demand is during the evening hours was incorrect. We stated that the period of peak parking demand occurs during the evening hours. Based on that comment, the City of Seattle requested that the developer recount the number of cars parked in the study area during the period of peak parking demand. The City suggested that the time frame of 6:00 p.m. to 7:00 p.m. could be used. The developer performed a count of cars between 6:00 p.m. and 7:00 p.m. on a weekday and discovered that the number of parked cars in the study area increased from 204 cars to 249 cars. Although this is an improvement in accuracy, we believe that the period of peak parking demand is between 6:00 p.m. and 8:00 p.m. on a Friday or Saturday, and that the amount of current peak demand for on street parking is still undercounted. Even this may undercount the demand when the Phinney Neighborhood Association parking lots fill up in the evening causing spillover parking on the nearby residential streets.

Issue #3 – Determine the Demand for Future Parking by the Development at 6726 Greenwood Ave. N.

The developer's initial parking study estimated that the amount of on street parking demand generated by the development at 6726 Greenwood Ave. N. would be 39 parking spaces. It was based on an estimate of 29 parking spaces for residential use and 10 parking spaces for retail use. The developer used the King County Right Sized Parking Calculator to determine the residential parking demand created by the development. The developer's study used a factor of .49 parking stall per unit to determine the residential parking demand created by the development. Our initial comment letter stated that the Institute of Transportation Engineers (ITE) Parking Generation manual should be used for this analysis. We pointed out that the ITE manual states that a development

such as this would create a residential parking demand of between 0.80 parking stalls per unit and 1.2 parking stalls per unit.

The developer's revised study retained the estimated on street parking demand of 29 parking spaces for residential use; however, reduced the estimated of on street parking demand for retail use from 10 parking spaces to 7 parking spaces. The justification that the developer sited for this reduction was the ITE Parking Generation manual.

We believe that the developer should be consistent in their reference source for estimating the amount of future on street parking demand generated by the development. We believe that the ITE Parking Generation manual is the most accurate source for estimating all future parking demand. Should the city allow use of the RSP model, then a review of the rental cost factor that underlies that model should be more accurate.

Our initial comment letter also pointed out that the amount of on street parking demand should include the seven parking spaces, currently on site, that are being eliminated by the development. The developer's parking study continues to ignore this fact. We also question the statement that there are "no natural or man-made barriers in the study area." The rather steep grade in both east and west directions from the project site are clearly barriers to the mobility impaired, parents with children, or anyone carrying groceries.

Issue #4 – Determine the Demand for Future Parking by Other Developments.

In the initial parking study, the developer identified five other developments in the study area that would create future on street parking demand. The developer estimated that those five developments would, in total, generate a demand for 13 on street parking spaces.

In our initial comment letter, we pointed out that two known developments in the study area (6528 Phinney Ave. N. and 7009 Greenwood Ave. N.) were not included in the developer's list of projects. Based on our comment, the City of Seattle requested that the developer include those two additional developments in the study. The City of Seattle stated that the development at 7009 Greenwood Ave. N. consists of 25 residential units and 20 parking spaces. However, after reviewing the permit status for this site, we discovered that the developer is proposing a six story development with 43 residential units, ground floor retail and 27 parking spaces. We believe that the information that the City provided to the developer about this site is incorrect.

Even if we disregard the incorrect assumption regarding the development at 7009 Greenwood Ave. N., the developer's revised parking study reduced their estimate of future on street parking demand for the original five developments and the two additional developments to six parking spaces (from 13 parking spaces). We believe that the developer continues to significantly underestimate the amount of future on street parking demand generated by other developments in the study area.

We find that the revised traffic study still does consistently use the methodology in Tip 117 or the RSP calculator, and does not accurately disclose the environmental impacts of the Phinney Flats project as proposed. As residents of the Phinney Ridge community, we find that the addition of anywhere from 36 to over 40 vehicles onto our already crowded neighborhood streets will result in a significant decline in neighborhood livability and result in serious hardship and frustration for current and future residents.

Conclusion

We find that the revised parking study **is still inadequate** due to the reasons listed above, and does not accurately disclose the environmental impacts from the proposed development. In addition, the revised parking study contradicts the developer's SEPA checklist related to impacts for on street parking in the study area. As residents of the Phinney Ridge community, we find that the addition of anywhere from 36 to

over 40 vehicles onto our already crowded neighborhood streets will result in a significant decline in neighborhood livability and result in serious hardship and frustration for current and future residents.

Sincerely,

Members of the Phinney Ridge Community Council Parking Committee



<p>Committee Members Patricia Carroll-Crippen Michael Richards David Crippen Tony Roth Irene Wall – PRCC Board Member iwall@serv.net</p>
