

Countryman, Ryan

From: Countryman, Ryan
Sent: Friday, February 05, 2016 5:04 PM
To: Gary Huff (GHuff@karrtuttle.com) (GHuff@karrtuttle.com)
Subject: Point Wells Parking
Attachments: Point Wells PRELIMINARY clarifications parking comments Feb 5 2016 version.pdf

Hi Gary,

I am following up on our February 2, 2016 conversation regarding parking at Point Wells. I called you to describe issues that I was finding in reviewing the March 4, 2011 application, specifically apparent differences in the amount of parking actually shown on the submittal drawings and the amount of parking stated to be provided. In short, it looks like the submittal drawings contain about 900 less parking stalls than they say they do. Other problems exist in the parking plans too. I am working on supplemental review comments that will be in addition to the review completion letter dated April 12, 2013 by Darryl Eastin and a request for clarified submittal drawings that I sent to you on July 29, 2015. This new letter will add detail and clarification about what Snohomish County is requesting and why. However, the new letter will take a while to complete. In the meantime, I am providing a portion of it that has been drafted relating to parking as an FYI and to help give substance to future conversations regarding the need for updated submittal drawings. Some details and cross-references in the attachment will change before we finalize our comments, so there is no need to respond at this time, but I think it will be useful for you to have this preliminary supplemental review so that it is clear why I called to share my concerns about parking earlier this week.

Thank you!

Ryan Countryman



Snohomish County

Departments of
Planning & Development Services
and Public Works

Disclaimer: This memo is for discussion only. Snohomish County is sharing it to facilitate discussion of necessary modifications to the project design. Final supplemental review comments will be supplied later after there has been an opportunity to cross-reference prior comments and second-order changes related to parking (e.g. noting that hypothetical design changes for second access may also affect the location of buildings and/or parking).

SUPPLEMENTAL PROJECT REVIEW COMPLETION LETTER: REGARDING PARKING

This letter supplements a review completion letter dated April 12, 2013 by Darryl Eastin and a request for clarified submittal drawings by Ryan Countryman dated July 29, 2015, by adding detail and clarification about what Snohomish County is requesting and why. In the April 12, 2013, letter, Snohomish County requested (among other things) the following related to parking:

- (l) Please provide a project data table indicating the following data for each building:
 1. Stories
 2. Height in feet above ground level
 3. **Structured parking spaces** [emphasis added]
- [...]
- (o) Minimum drive aisle width for surface and structured parking adjacent to perpendicular parking stalls is 25 feet pursuant to SCC Table 30.26.065(13). This Table also provides dimensional requirements for other types of drive aisles and parking stall configurations.
- (p) Propose shared parking shall comply with the requirements of SCC 30.34A.050(6).
- (q) Are structured parking entrances located behind or to the side of buildings pursuant to SCC 30.34A.050(1)?
- (r) Parking requirements for urban center are determined by the parking ratios in SCC Table 30.34A.050. In order to determine the parking requirement for the project, the following data is needed:
 - Total restaurant floor area
 - Total retail floor area
 - Total office floor area
 - Total residential units over 1,000 SF
 - Total residential units less than 1,000 SF
 - Total civic building floor area
 - Total police/fire floor area

A parking demand analysis may be required for uses not listed in the above table pursuant to SCC 30.34A.050(5).

Issue of Concern: Parking

The March 4, 2011, Urban Center Submittal does not provide adequate parking for the uses shown. It states that the “Actual Parking Provided” is 3,327 stalls for the project plus an additional 20 for the adjacent Brightwater facility (Sheet A-053). Yet, Snohomish County estimates that the actual parking proposed is really just 2,423 stalls plus an additional 10 for Brightwater (see Table 1, below). There is no parking provided for bicycles, the public access beach and pier, accessible parking, or the Sound Transit platform. Too many of the proposed stalls are for compact cars only (there is a maximum of 40% compact parking). Finally, the dimensions of some of the drive aisles and parking stalls are less than required by code. This means that the number of approvable stalls would likely be less than the 2,423 estimated by Snohomish County. The applicant must submit revised parking plans showing how the parking plan is consistent with the applicable code.

Point Wells Urban Center Proposal Parking Summary

Use	Amount	Minimum	Maximum	Requirement	Per Sheet A-053 ¹	Snohomish County Estimate ²	
Restaurant	18,000 sq ft	2/1,000 sq ft	8/1,000 sq ft	36 to 144 stalls	3,327 stalls for entire project		
Retail	64,935 sq ft	2/1,000 sq ft	4/1,000 sq ft	130 to 260 stalls			
Office	24,762 sq ft	2/1,000 sq ft	4/1,000 sq ft	50 to 99 stalls			
Residential (<1,000 sq ft each)	1,981 units	1/unit	1.5/unit	1,981 to 2,972 stalls			
Senior Housing	1,100 units	0.5/unit	1/unit	550 to 1,100 stalls			
Public Access Beach and Pier	19.3 acres	See SCC 30.34A.050(5)		To be determined			No public access parking shown
Sound Transit Platform	1 Commuter Rail Station	See SCC 30.34A.050(5)		To be determined			No sound transit parking shown
Brightwater	It is unclear why parking for Brightwater appears. Is there an easement or other agreement requiring parking on the Point Wells site?				20	10	
Total				2,747 to 4,575 stalls (plus additional amounts TBD and Brightwater)	3,327 stalls (plus 20 for Brightwater)	2,423 stalls (plus 10 for Brightwater)	

Table 1 – Point Wells Urban Center Proposal Parking Summary

¹ This information is from a Table titled “Actual Parking Provided” that is repeated on Sheet A-054. For simplicity in this discussion, we refer to Sheet A-053 as the original source, but the table on both sheets will need revision. See Figure [redacted] on page [redacted].

² See discussion on the following pages for how Snohomish County Estimate arrives at this estimate.

Point Wells Urban Village Alternative Parking Summary

Use	Amount	Minimum	Maximum	Requirement	Per Sheet A-053 ³	Snohomish County Estimate ⁴	
Restaurant	18,000 sq ft	2/1,000 sq ft	8/1,000 sq ft	36 to 144 stalls	3,327 stalls for entire project		
Retail	64,935 sq ft	2/1,000 sq ft	4/1,000 sq ft	130 to 260 stalls			
Office	24,762 sq ft	2/1,000 sq ft	4/1,000 sq ft	50 to 99 stalls			
Residential (<1,000 sq ft each)	1,622 units	1/unit	1.5/unit	1,622 to 2,433 stalls			
Senior Housing	978 units	0.5/unit	1/unit	489 to 978 stalls			
Public Access Beach and Pier	19.3 acres	See SCC 30.34A.050(5)		To be determined			No public access parking shown
Sound Transit Platform	1 Commuter Rail Station	See SCC 30.34A.050(5)		To be determined			No sound transit parking shown
Brightwater	It is unclear why parking for Brightwater appears. Is there an easement or other agreement requiring parking on the Point Wells site?				20	10	
Total				2,327 to 3,914 stalls (plus additional amounts TBD and Brightwater)	3,327 stalls (plus 20 for Brightwater)	2,423 stalls (plus 10 for Brightwater)	

Table 2 – Point Wells Urban Village Alternative Parking Summary

General Development Standards – Parking (Chapter 30.26 SCC)

Most of the requirements relating to parking are in Chapter 30.26 SCC. Additional parking requirements are in Chapter 30.34A SCC and .

Comment [RMC1]: Revisit this list and add page references when the rest of the review is done.

SCC 30.26.010 Applicability

The parking requirements of Chapter 30.26 SCC shall apply to Point Wells.

³ This information is from a Table titled “Actual Parking Provided” that is repeated on Sheet A-054. For simplicity in this discussion, we refer to Sheet A-053 as the original source, but the table on both sheets will need revision. See Figure on page .

⁴ See discussion on the following pages for how Snohomish County Estimate arrives at this estimate.

SCC 30.26.015 Maneuvering and Queuing

PDS has the authority to require changes in proposed parking layout to meet the requirements of Chapter 30.26 SCC and to ensure that maneuvering or queuing vehicles does not block pedestrian routes.

Former SCC 30.26.020 Location of Parking Spaces

This code section requires that parking at Point Wells shall be “within 300 feet of and on the same lot or building site with the building it serves.” Most of the parking will be in four garages, one garage under each major phase. Each phase must meet the parking requirements independently.

Comment [RMC2]: Revise for consistency with related sections when fully drafted.

We also note that there is no parking associated directly with the public access beach and pier in the current proposal. This issue must be addressed in a revised proposal. For further discussion of parking, see the review of the urban center parking requirements in *former* SCC 30.34A.050 that takes place on the next page under SCC 30.26.032, which is the new location of *former* SCC 30.34A.050.

Former SCC 30.26.025 Tandem Parking

This section does not apply to the Point Wells proposal.

Former SCC 30.26.030 Number of Spaces Required.

This section describes the number of spaces required by use for all zones except Urban Center. Since Point Wells has vesting to Urban Center zoning, which has a separate table showing the number of spaces required by use, this section of code does not apply to Point Wells. However, we note that the assumption for the Urban Village Alternative is that it is a revised application under Urban Center zoning. If, for some reason, it were a new application under present-day PCB zoning, then the parking ratios required would be those found in *present-day* SCC 30.26.030 or its successor

SCC 30.26.032 Additional Parking Requirements for the UC Zone / Former SCC 30.34A.050 Parking ratios, parking locations and parking lot and structure design

Point Wells has vesting to the parking ratios in *former* SCC 30.34A.050 (part of the chapter on Urban Center Development). This former code section was revised slightly and moved into the parking Chapter 30.26 SCC where it made logical sense. The following review is for consistency with *former* SCC 30.34A.050, but it takes place here (at present-day SCC 30.26.032) because this places the review in context.

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Former SCC 30.34A.050 gives the required minimum and maximum number of required parking spaces for uses in Urban Center Zoning. Unless modified by a parking study, the provision of parking within the minimum to maximum range constitutes an adequate supply of parking. When combined with the location of parking requirements in former 30.26.020 SCC, it is clear that each phase of Point Wells must be able to demonstrate that the phase provides sufficient parking for the proposed uses within the same phase. Snohomish County has also already noted in its review of former 30.26.020 SCC that the current proposal does not address parking for the public access beach and pier. There are six subsections in former 30.34A.050 SCC.

(1) Parking Ratios: Point Wells must provide parking consistent with the minimum and maximum ratios in Table 30.34A.050(1) SCC, which are restated in Table 3, below. As determined in the review of former SCC 30.26.020 Location of Parking Spaces, each phase must meet these requirements.

Use	Minimum	Maximum	Bicycle Parking
Restaurants	2 stalls/1000 nsf	8 stalls/1000 nsf	2 spaces minimum
Retail	2 stalls/1000 nsf	4 stalls/1000 nsf	2 spaces minimum
Office	2 stalls/1000 nsf	4 stalls/1000 nsf	2 spaces minimum
Residential (units >1000 sq ft each)	1.5 stalls per unit	2.5 stalls per unit	2 spaces minimum
Residential (units <1000 sq ft each)	1 stall per unit	1.5 stalls per unit	2 spaces minimum
Senior Housing	0.5 stalls per unit	1 stall per unit	2 spaces minimum
All other uses	See SCC 30.34A.050(5)		2 spaces minimum

Table 3 – Parking Ratios from Table 30.34A.050(1) SCC

The Point Wells submittal documents do not show any bicycle parking, yet bicycle parking is required. The applicant must submit a revised plan that shows how it meets the requirement to provide bicycle parking. See **Error! Reference source not found.**, page **Error! Bookmark not defined.**

Using information provided in the Urban Center application,⁵ the parking requirements and parking proposed by phase⁶ – as well as review of each phase – are as follows:

⁵ Unless noted otherwise, the basis for these figures is the data table on Sheet A-050. It has been noted elsewhere (add citations when written) that some of these figures are not internally consistent. This table also assumes that all units are less than 1,000 square feet in size. This assumption relies on incomplete floor plan information in the original application and may need further revision to match a modified proposal.

⁶ By “phase”, this review differs slightly from the phasing plan shown on Sheet A-056 in two ways. (1) Two retail buildings in the Urban Plaza that are proposed to be built early in the project would actually count toward the parking requirements of the Urban Plaza, not the first phase of construction, which would be the South Village. (2) The energy center located in the Central Village is proposed to be constructed early as the South Village is built, but the parking associated with it would need to be located in the Central Village.

Phase 1: South Village (Car Parking Requirements)						
Use	Amount	Minimum	Maximum	Requirement	Per A-053 ⁷	SnoCo Estimate ⁸
Restaurant	8,000 sq ft	2/1,000 sq ft	8/1,000 sq ft	16 to 64 stalls		33 to 61 total shared stalls ⁹
Retail	24,000 sq ft	2/1,000 sq ft	4/1,000 sq ft	48 to 96 stalls		
Residential (<1,000 sq ft each)	600 units	1/unit	1.5/unit	600 to 900 stalls		636 to 664 total residential stalls ¹⁰
Senior Housing	53 units	0.5/unit	1/unit	27 to 53 stalls		
Share of Public Access Beach and Pier	Unknown Share	See SCC 30.34A.050(5)		To be determined		No public access parking shown
Brightwater	It is unclear why parking for Brightwater appears. Is there an easement requiring parking on the Point Wells site?				20	10
Total				691 to 1,113 stalls + amount TBD for public access and Brightwater	1,048 stalls (plus 20 for Brightwater) per Sheet A-053	715 stalls (plus 10 for Brightwater)

Table 4 – Summary of South Village Car Parking

South Village Parking Summary: It appears that the South Village lacks adequate parking. The amounts stated on the submittal drawings (1,048 stalls per Sheet A-053) would be a sufficient overall figure, but closer examination suggests that the actual number is only around 715 stalls. Further, there is not enough parking for the non-residential uses, which includes a minimum of 64 stalls¹¹ plus an unknown number for the public beach and pier access. At most, the proposed action has only 61 stalls for non-residential uses. Regarding residential uses, it appears that the drawings show sufficient parking, but this may not be the case if some of the residential stalls

⁷ This information is from a Table titled “Actual Parking Provided” that is repeated on Sheet A-054. For simplicity in this discussion, we refer to Sheet A-053 as the original source, but the table on both sheets will need revision. See Figure [redacted] on page [redacted].

⁸ See discussion on the following pages for how Snohomish County Estimate arrives at this estimate.

⁹ This range depends on uncertainty for how to count the 28 unidentified stalls shown on Figure 1. There are clearly 15 shared parking stalls on Sheet A-103 and nine shared stalls in each of two garage levels per Sheet A-054 (15+9+9=33). If the 28 unidentified stalls were included, then the total restaurant and retail parking would be 61 stalls (15+9+9+28=61). Unfortunately, this larger number would contradict the note on Sheet A-053 that there are residential stalls on the ground level. In any event, it is impossible that there are 50 commercial stalls at the ground level as indicated on this same note because 15+28=43.

¹⁰ As with the restaurant + retail parking, this range depends on how one counts the 28 unidentified stalls in Figure 1. It also relies on discussion on subsequent pages where Snohomish County estimates that each of the parking garage floors only has 327 total stalls, of which 318 are for residential purposes (because each floor also has nine shared stalls). 318+318= 636 and 318+318+28=664.

¹¹ This figure comes from adding 16 for the restaurants to 48 for the retail areas.

need repurposing to meet the non-residential requirements. The amount of parking shown for this phase is inadequate. New submittal drawings will be necessary to correct the deficiencies and to confirm the size of residential units in the phase because some of the parking requirements vary depending on unit size.

South Village Parking Details: Our understanding of the Urban Center submittal is that the figure of 1,048 stalls on Sheet A-053 uses an assumption of one parking stall for every 350 square feet of parking area, rather than an actual count based on the submittal drawings. This ratio assumes a very efficient design to the parking areas. Our professional judgment and the submittal drawings themselves suggest that the unusual geometries¹² of the site would make achieving this degree of parking efficiency infeasible. In other words, we do not see how it is possible to fit 1,048 parking stalls in the South Village.

Among other things, Sheet A-053 shows:

1. The surface parking for the South Village,
2. How drawing assumes one stall per 350 square feet of parking area,
3. The location of an adjacent Brightwater facility,
4. 20 parking stalls assigned to Brightwater, and
5. Purports to demonstrate 78 surface parking stalls in this area.

See Figure 1 on the next page.

Sheet A-103 has a less cluttered illustration of the same area. Figure 2, next page, adds numbers to the parking stalls to create an actual count by purpose to the stalls shown. This count sums up to 53 stalls (15 shared, 28 for an unidentified purpose (presumably shared parking for the restaurants and retail), and 10 for Brightwater). These numbers conflict with the claims on sheet A-053 (Figure 1) that there are 78 surface parking stalls in the South Village and that the table listing parking counts represents the “Actual Parking Provided.”

¹² By “unusual geometries,” we are referring to broad curves on the garage perimeter and irregularly spaced elevators inside the garage. These features make for a pleasing aesthetic on the above-ground portions of the site but they also make designing an efficient garage layout more difficult.

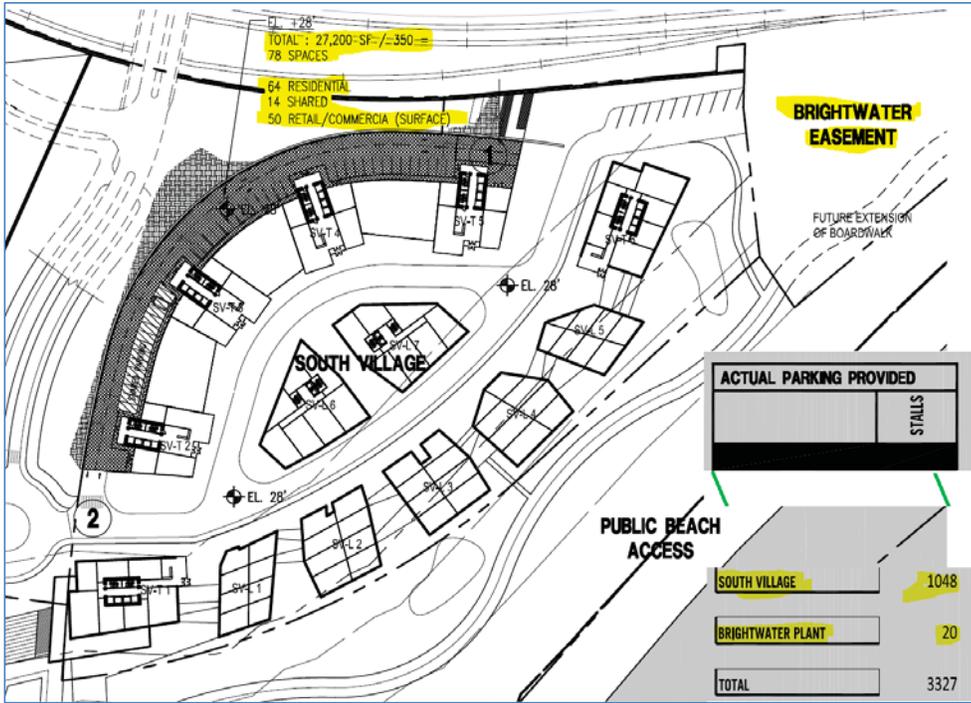


Figure 1 – Portions of Sheet A-053 with Highlights Added

DRAFT



Figure 2 – Actual Count of Parking Stalls on Sheet A-103

The challenge of reconciling the parking in South Village garage is similar to the issues with surface parking. The table titled “Actual Parking Provided” on sheet A-053 uses numbers that are really parking *estimates*. These estimates significantly overstate what the application shows for parking. Sheet A-054 shows the layout of below grade parking. It estimates that the garage would contain 460 spaces per floor based on dividing the total area by an assumption of one stall per every 350 square feet. However, by our count, there are around 327 spaces shown, but this count is in need of clarification because some of the stalls shown are ambiguous as to whether they would meet dimensional requirements (see Figure 4, next page).

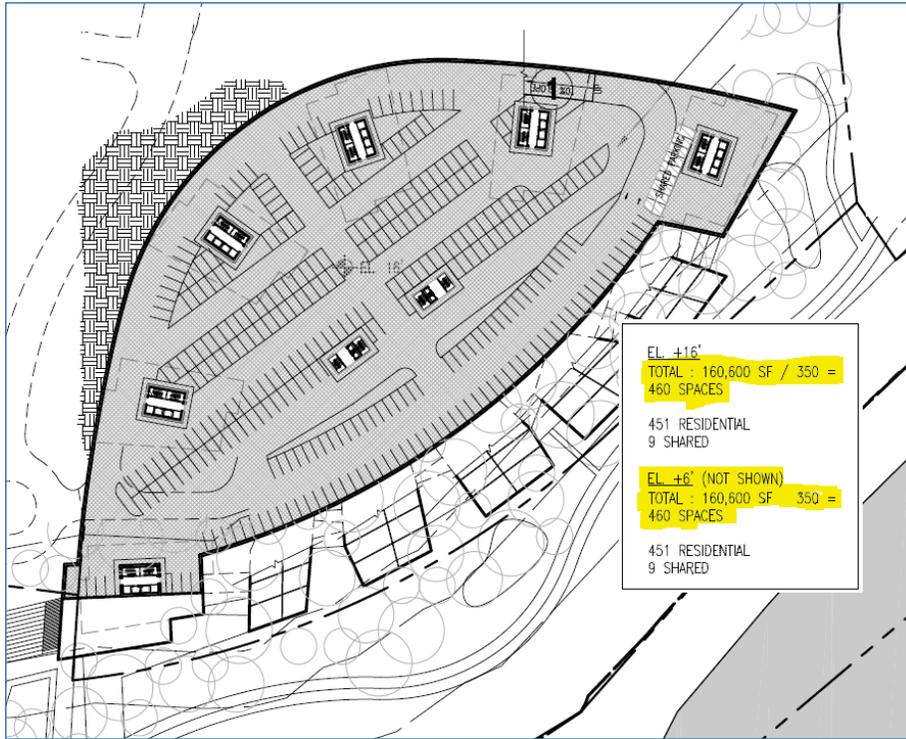


Figure 3 – Layout of Parking Garage Level 1 for South Village from Sheet A-054



Figure 4 – Example of Ambiguous Parking Stall

Urban Plaza Parking Details: The submittal drawings are confusing with respect to parking for the Urban Plaza. A cross-section on Sheet A-310 (see Figure 5, next page) shows parking on two levels of garage (at 25' and 35' in elevation) and potentially additional parking at the surface level (55' in elevation), yet there does not appear to be any parking at the surface. A summary of parking for the Urban Plaza appears on Sheet A-053. This summary does not match Sheet A-310. The summary sheet A-053 indicates that there is parking at 25', 35', and 45' (see Figure 6, next page). Based on the circulation plan on Sheet A-055 (see Figure 7, next page) we assume that the 45' figure on sheet A-053 actually refers to the 55' elevation. This assumption is consistent with Sheet A-310 because there are ramps at 45' that cannot possibly load into an additional level at this elevation. This assumption is also consistent with what is shown on Sheet A-310 where the ramps appear on the cross-section.

At the 55' elevation, Sheet A-053 states that there are 50 stalls for commercial (office)/retail uses (Figure 6). Yet, the detail on Sheet A-100 shows only circulation drop off at this level (see Figure 8 on page 13). There is no parking at the 55' level for the office or retail uses.

At the 35' elevation, Sheet A-100 shows a parking layout with 112 stalls (by Snohomish County's count) (see Figure 9 on page 14). This is different from the summary information on Sheet A-053 (Figure 6) which says that there are 200 residential spaces at this level. Because of the geometry of the site and the bus drop-off area, it is probably impossible to redesign the parking at this level to provide 200 stalls. Similarly, at the 25' parking elevation there appears to be just 201 stalls whereas Sheet A-053 says that there are 275 stalls.

Phase 2: Urban Plaza (Car Parking Requirements)						
Use	Amount	Minimum	Maximum	Requirement	Per A-053	SnoCo Estimate
Office	32,262 sq ft	2/1,000 sq ft	4/1,000 sq ft	65 to 129 stalls	50 stalls	313 stalls total with notes describing this as "shared parking."
Retail	26,300 sq ft	2/1,000 sq ft	4/1,000 sq ft	53 to 105 stalls		
Residential (<1,000 sq ft each)	254 units	1/unit	1.5/unit	254 to 381 stalls	475 or 477 stalls ¹³	
Sound Transit Platform	Unknown Share	See SCC 30.34A.050(5)		To be determined	None	None
Total				372 to 615 stalls (plus amount TBD for Sound Transit)	525 or 527 stalls	313 stalls

¹³ Parking counts appear in two places on Sheet A-053. The first lists the purpose and number of stalls at various floor elevations: 50 commercial(office)/retail stalls at the plaza level (45'), 200 stalls at the 35' level, and 275 stalls at the 25' level. This totals 475 stalls. The second figure (477 stalls) is in the table title "Actual Parking Provided."

Table 5 – Summary of Urban Plaza Car Parking

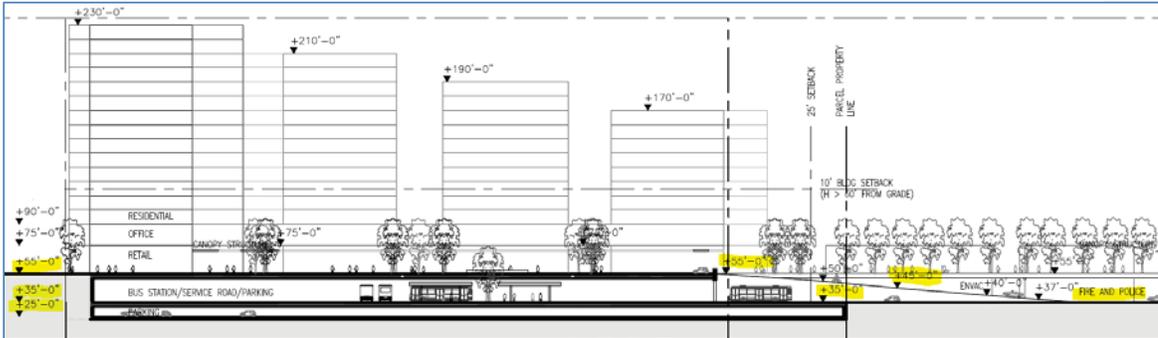


Figure 5 – Urban Plaza Cross-Section from Sheet A-310

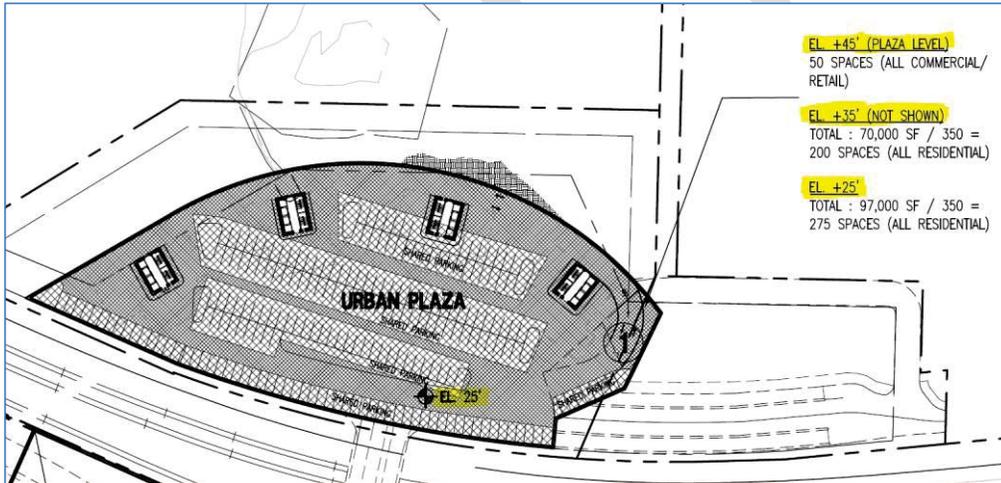


Figure 6 – Urban Plaza Excerpt from Sheet A-053

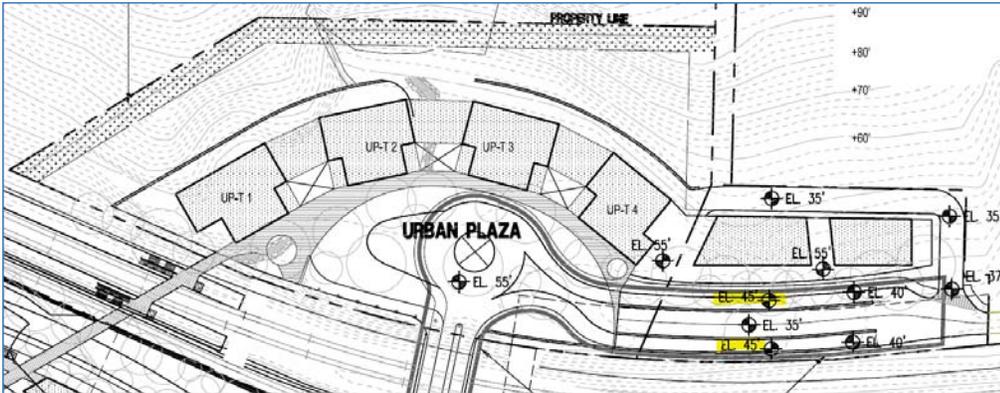


Figure 7 – Urban Plaza Circulation Excerpt from Sheet A-055.

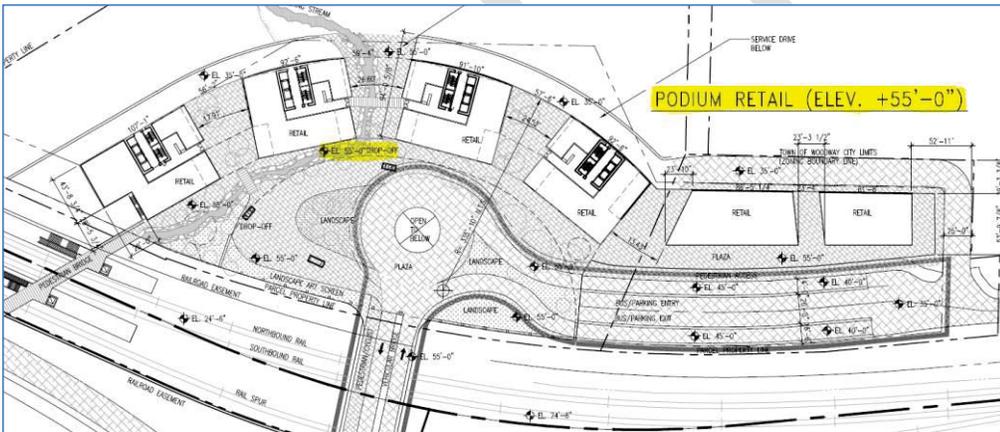


Figure 8—Plaza Level (55' Elevation) Circulation Excerpt from Sheet A-100

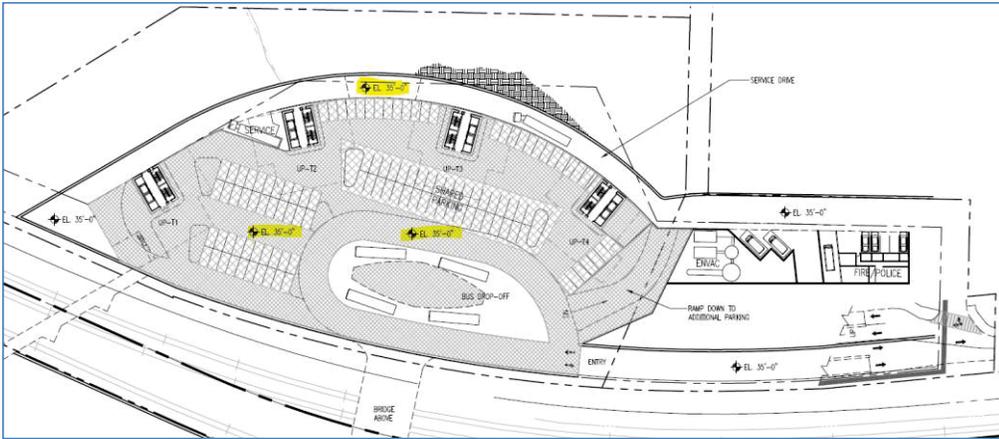


Figure 9 – Parking at 35’ Elevation Excerpted from Sheet A-100

Central Village Parking Details: The submittal drawings state that there are 962 stalls provided in the Central Village (Sheet A-053), yet the drawings themselves show only 775 stalls in total. Figure 10, next page, shows that there are only 63 surface stalls where the drawings estimate that there are 187. In the parking garage, Figure 11 on the next page demonstrates that there are 712 stalls in the garage yet Sheet A-054 says that there are 725 spaces.

Phase 3: Central Village (Car Parking Requirements)						
Use	Amount	Minimum	Maximum	Requirement	Per A-053	SnoCo Estimate
Retail	44,000 sq ft	2/1,000 sq ft	4/1,000 sq ft	88 to 176 stalls	962 stalls	775 stalls
Residential (<1,000 sq ft)	763 units	1/unit	1.5/unit	763 to 1,145 stalls	(not enough detail to split by use)	(not enough detail to split by use)
Senior Housing	508 Units	0.5/unit	1/unit	254 to 508 stalls		
Total				1,105 to 1,829 stalls	962 stalls	775 stalls

Table 6 – Summary of Central Village Car Parking

North Village Parking Details:

Phase 4: North Village (Car Parking Requirements)						
Use	Amount	Minimum	Maximum	Requirement	Per A-053	SnoCo Estimate
Residential (<1,000 sq ft)	364 units	1/unit	1.5/unit	364 to 546 stalls	770 stalls (or 720 stalls on Sheet A-054)	620 stalls (some do not appear to meet dimension requirements)
Senior Housing	539 Units	0.5/unit	1/unit	270 to 539 stalls		
Total				634 to 1,085 stalls	770 (or 720) stalls	620 stalls

Table 7 – Summary of North Village Car Parking

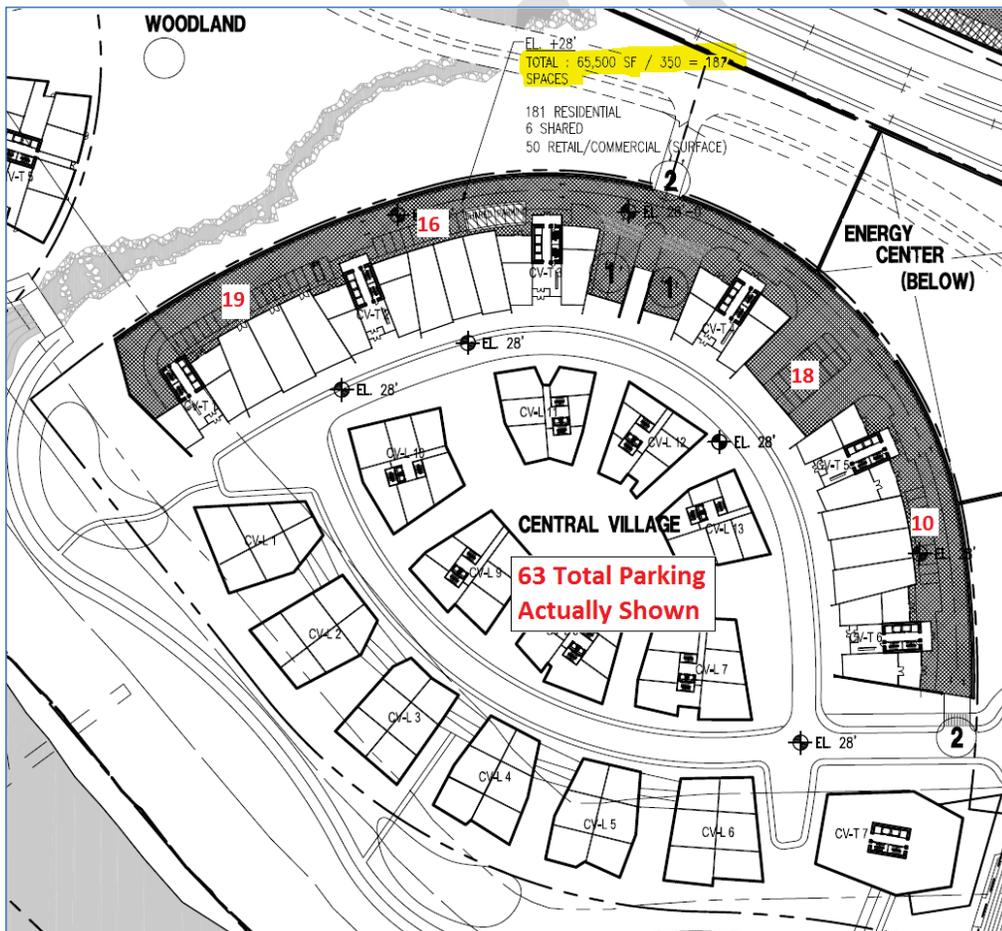


Figure 10 – Central Village Surface Parking from Sheet A-053

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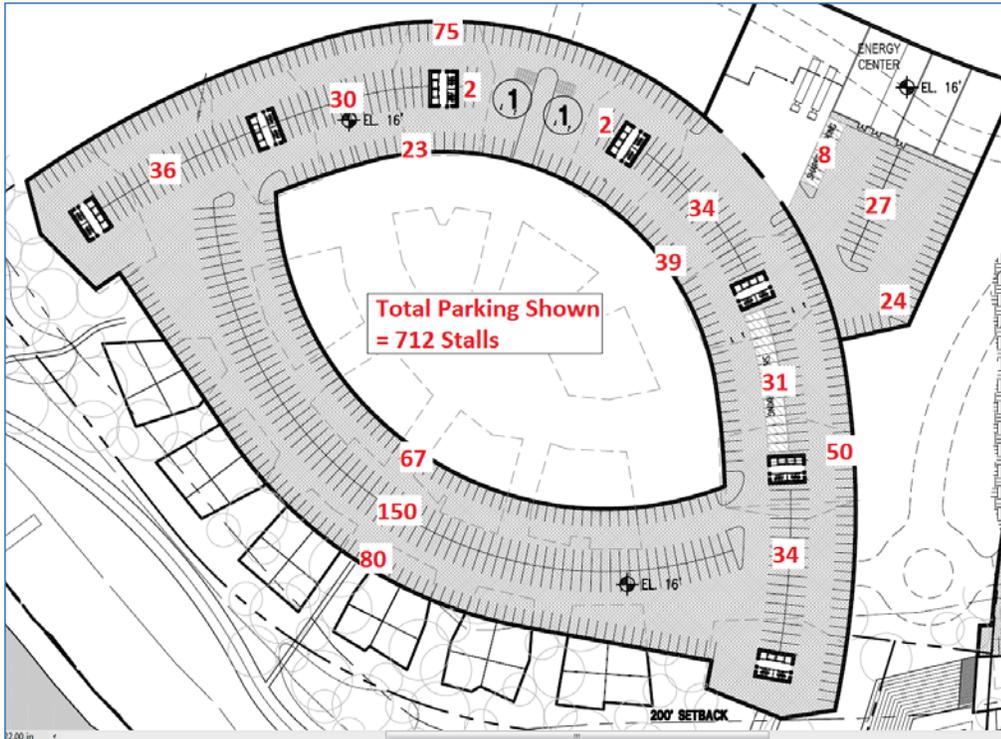


Figure 11 – Central Village Parking Garage Plan from Sheet A-054 with Number of Stalls

It is common for an applicant to reconfigure parking to increase efficiency between preliminary and final design. In this case, however, the large difference between what submittal drawings state as “actual parking” and what the drawings actually show is a major concern.

While parking is not directly an EIS-level concern, revisions to the site plan to provide 1,048 parking stalls in the South Village may necessitate supplemental environmental analysis. Otherwise, it may be necessary to scale back the number of units or non-residential uses to fit with the actual amount of parking proposed.

To address this uncertainty, we are requiring submission of additional sheets showing by phase the details of how much parking is actually proposed. Given the current degree of uncertainty as to whether sufficient parking is possible, Snohomish County cannot recommend approval for the

project based on the March 4, 2011 submittal or an EIS that relies on this submittal. Because of the scope of the EIS, it is not strictly necessary to update the parking plan prior to the Final EIS; however, as parking issues would prevent Snohomish County from being able to approve the project, we strongly recommend supplementing the submittal drawing with details on parking prior to the FEIS. This would help avoid a recommendation of denial or a requirement to perform supplemental EIS work¹⁴ to account for significant new information such as a major redesign to fix parking deficiencies.

Subsection (2) says that, “Parking must be located under, behind or to the side of buildings.” The proposal does this.

Subsection (3) says that, “Parking lots must be landscaped pursuant to SCC 30.25.022.” Since nearly all of the parking is below buildings, only parking shown for Brightwater would be subject to this requirement. Per SCC 30.25.022 this parking lot area may need to include a landscaping island; however, other comments relating to parking area may require a redesign of this parking. These other comments involve:

1. Fire access turnarounds or circulation (Add reference after these comments are written.)
2. The number of stalls provided for Brightwater (Sheet A-053 says that the “Actual Parking Provided” is 20 stalls, but there are only 10 stalls shown).

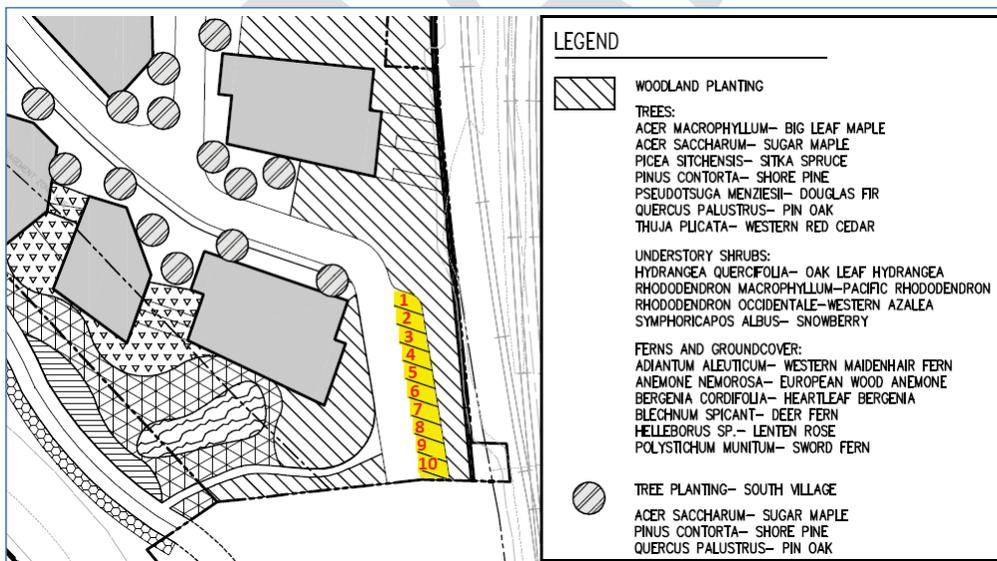


Figure 12 – Landscaping Near Brightwater Parking Area (Adapted from Sheet L-101)

¹⁴ [WAC 197-11-405](#) describes the types of EIS’, including supplemental EIS.

Subsection (4) begins, “Parking garage entrances must be minimized, and where feasible, located to the side or rear of buildings.” The Urban Center submittal accomplishes the minimizing the visibility of the parking garages. Evaluation of the remaining guidance in the subsection relating to lighting and architectural detailing will take place after submittal of building and garage elevations.

Subsection (5) begins, “Uses not listed in Table 30.34A.050(1) must undergo a parking demand analysis by an independent consultant with expertise in parking demand analysis to ensure no more than the necessary amount of parking is provided.” The Point Wells proposal includes three uses not listed in Table 30.34A.050(1) and we do not have enough information about these uses to determine how much parking is required. A revised submittal must include information on the following uses, including independent consultant analysis if necessary:

1. Public access to the beach and pier;
2. Sound Transit station; and
3. Brightwater parking.

Subsection (6) gives the requirements for requesting a reduction in the parking space requirements of SCC Table 30.34A.050(1). The March 4, 2011, submittal suggests that such a request would be forthcoming with a note on Sheet A-053 (**Error! Reference source not found.**, below).

It is highly unlikely that Snohomish County could support a parking reduction from what appears on the March 4, 2011 submittal. Our review of Chapter 30.26 SCC, summarized in Figure 13, shows that the project is proposing approximated 900 stalls less than the stated total. This shortfall is such that the project does not meet the minimum parking requirements. Elsewhere, our July 29, 2015 request for clarifications discusses how the number of units stated and number of units shown do not match (the submittal drawings do not show the 3,081 units stated; rather, they show an uncertain number of units less).

ACTUAL PARKING PROVIDED		STALLS	Snohomish County Estimate (see review of SCC 30.26.032 / former 30.34A.050 for details)
URBAN VILLAGE	527	313	
NORTH VILLAGE	770	620	
CENTRAL VILLAGE	962	775	
SOUTH VILLAGE	1048	715	
BRIGHTWATER PLANT	20	10	
TOTAL	3327	2433	

***NOTE: THE PROJECT INTENDS TO REDUCE THE ABOVE PARKING REQUIREMENTS AS ALLOWED THROUGH A SHARED PARKING STUDY**

Figure 13 – Parking Summary and Note Adapted from Sheet A-053

Between the shortfalls in the number of parking stalls provided and the fact that the floor plans do not indicate 3,081 units, the project must be modified for both internal consistency and for consistency with County Code.

As a general approach, we suggest that decisions regarding modifications proceed in the following general manner:

1. Show how the project meets the requirement to have two access routes to the site.
2. Revise internal roads and fire access routes to show how adequate access is provided internally to the site (including two crossings of the railroad right-of-way).
3. Adjust building locations and footprints to account for the items above (plus a few other specific comments to be written).
4. Provide information on how much parking or loading area is required for:
 - a. The public access beach and pier (number of stalls required);
 - b. The Sound Transit platform (number of stalls required);

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- c. Brightwater (number of stalls required);
 - d. Envac (loading); and
 - e. Police/Fire (parking and loading).
5. Update commercial area estimates and determine how much parking is required for these uses.
 6. Redesign parking areas so that they meet submittal requirements (such as numbering and detailed sheets on all parking areas) and code requirements such as providing ADA spaces, proper dimensions, and a mix of conventional and compact stalls that meets Snohomish County requirements. Calculate an accurate total number of stalls provided.
 7. Show the location of parking for non-residential uses in proximity and numbers of stalls as required.
 8. Using the unallocated parking, and by phase, determine the mix of unit types and sizes desired. Keep in mind that changes to these affects the parking requirements:
 - a. Senior-only units require a minimum of 0.5 stalls and have a maximum of 1.0 stall per unit.
 - b. Residential units *under* 1,000 square feet have a minimum parking of 1.0 stall per unit and a maximum of 1.5 stalls.
 - c. Residential units *over* 1,000 square feet have a minimum parking of 1.5 stalls per unit and a maximum of 2.5 stalls.
 9. With the desired unit mix in 8 determined, design floor plans to show these units. If necessary, repeat 8 and 9 until the mix of unit types and required parking are compatible with the amount of parking shown.
 10. Submit a revised application consistent with 1-9 and the following other details.
 - a. Need to list
 - b. Need to list
 - c. etc

A reduction from the parking space requirements as specified in SCC Table 30.34A.050(1) may be may be approved under SCC 30.34A.180 if a shared parking study based on the either the Urban Land Institute Shared Parking Report, ITE Shared Parking Guidelines, or other approved procedures is prepared by an independent consultant with expertise in performing shared parking studies. The study must demonstrate that the development will result in a more efficient use of parking provided the combined peak parking demand is less than that required in SCC Table 30.34A.050(1). The number of spaces required for an approved shared parking plan shall be based on the number of spaces estimated to be the combined use peak parking demand.

SCC 30.26.035 Parking for Specific and Unlisted Uses

When a project proposes uses that do not have defined parking requirements, the planning department may determine how much parking is required. This requirement shall be “based upon parking requirements for comparable uses and comparative data as may be available to staff. The department may require the applicant to submit or fund a parking study prepared by an independent consultant...”

Four of the uses proposed at Point Wells do not have defined parking requirements and the planning department does not have enough information to determine how much parking is required for each. Before PDS can recommend approval of a project at Point Wells, the department must be able make a determination on parking requirements for these uses. To do this, the applicant must provide additional information on each, up to and possibly including a parking study as allowed by this section. The uses that require additional information include:

1. The public beach access and pier;
2. The proposed Sound Transit platform;
3. The parking reserved for Brightwater; and
4. The proposed police/fire station.

Former 30.26.040 Reduction of Required Parking Spaces

This section allows the planning department to approve a reduction in the number of required parking spaces, subject to certain conditions. Under subsection (3), this reduction can be up to 40% of the required spaces. It is important to note that this only happens “when an applicant demonstrates that effective alternatives to automobile use, including but not limited to van pooling, ride matching for carpools, and provision of subscription bus service will be implemented and will provide an effective and permanent reduction in parking demand.”

The applicant has not provided information to demonstrate a justification for reduced parking. On submittal Sheet A-053, there is a note reading, “The project intends to reduce the above parking requirements as allowed through a shared parking study.” The “above parking requirements” referred to in the note refer to calculations on the submittal drawings that are in error.¹⁵ The proposed uses require more parking than the application shows and the application shows less parking than the calculations on it claim. If the applicant submits a revised proposal, it may be possible to entertain a reduction in the number of required spaces. However, the applicant must first correct the errors documented above and then submit sufficient information to justify the requested reduction.

SCC 30.26.045 Mixed Occupancies

SCC 30.26.050 Joint Uses

SCC 30.26.055 Conditions for Joint Uses

Base parking requirements are additive. This means, for example, that commercial parking requirements are in addition to residential parking requirements. The submittal drawings include

¹⁵ See review of SCC 30.26.032 Additional Parking Requirements for the UC Zone / *Former* SCC 30.34A.050 Parking ratios, parking locations and parking lot and structure design beginning on page 34.

“shared parking” areas as illustrated in Figure 14, below. Snohomish County interprets these as intended to be synonymous with parking for joint uses as allowed for by SCC 30.26.050, but the application does not currently include sufficient information to joint or shared parking for mixed uses.

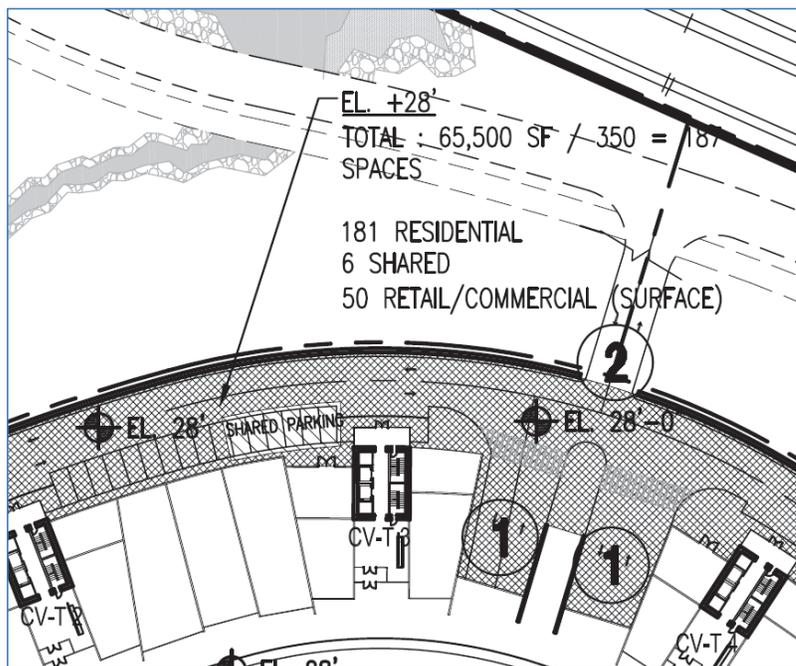


Figure 14 – Example of Share Parking from Sheet A-053.

The planning department may authorize joint use of parking facilities for as suggested in Figure 14, above, but the applicant must request this and provide information to demonstrate that the project meets the conditions for joint use. The applicant will need to provide this information or PDS cannot recommend approval of a site plan with shared or joint use parking.

SCC 30.26.060 Loading Space

Loading spaces for trucks and vans are required for certain non-residential uses involving the receipt of material and merchandise. Evaluation of loading spaces is by phase and for locations in each phase.

Uses proposed at North Village are entirely residential, so no loading spaces are required. The Central and South Villages both have retail/restaurant spaces; it is advisable but not required to provide loading space for these businesses. Likewise, given the number of residential units, the project parking and access plan should include consideration of moving vans, but this is not strictly required.

The only phase that shows loading spaces is the Urban Plaza (see Figure 15, next page). Per SCC 30.26.060(3), the number of spaces shall be one “for every 20,000 square feet, or fraction thereof, of gross building area”.

The application proposes 26,300 square feet of supermarket in the Urban Plaza. Two loading spaces are required for the market and two are proposed. It is not clear, however, whether adequate space for standing, loading, and unloading has been provided (SCC 30.26.060(2)) or whether it is possible that “no part of a truck or van using the loading space will project into the public¹⁶ right-of-way” (SCC 30.26.060(4)).

The application also proposes ENVAC (garbage collection/compaction) and fire/police areas in the Urban Plaza. Loading areas for these are proposed, consistent with SCC 30.26.060(1)(m) and the proposed spaces appear to meet the basic dimensional requirements of county code. However, we cannot assume standard dimensional loading to be adequate for these users. Snohomish County recommends that the applicant request letters from the proposed service providers stating that the proposed loading areas are adequate. **[Need to add reference to authority for this requirement.]**

Finally, we note that the proposal for the service drive includes 25' width at the ENVAC and fire/police area but it would then constrict to just 20' wide in the area of the service loading for the market. The portion with 25' is consistent with the perpendicular car parking at the police/fire area (see related discussion of former SCC 30.26.065 Parking Lot Development Standards below). However, at the service loading for the market, the application will need to show how “continuous, unrestricted vehicular movement” will be provided if trucks accessing the loading area need to stop, block traffic, and back up to access the loading spaces (*former* SCC 30.26.065(2)). The same concern exists, to a lesser extent, at the loading for ENVAC and fire/police.

¹⁶ As proposed, the rights-of-way at Point Wells would be *private*, but Snohomish County takes the position that SCC 30.26.060(4) still applies based on the requirement in SCC 30.26.060(2) to “*avoid undue interference* with undue interference with the public uses of the streets or alleys.” Public use of private roads could suffer undue interference if loading areas are not properly designed.

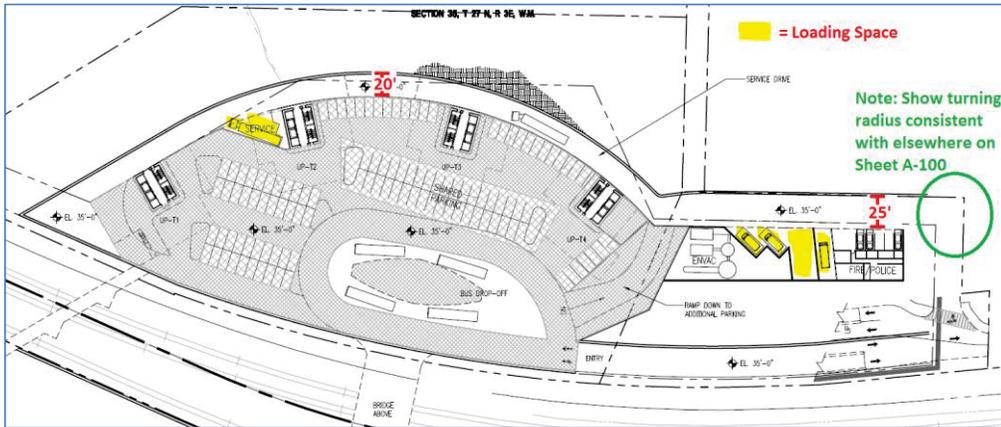


Figure 15 – Loading Areas in Urban Plaza Adapted from Sheet A-100

SCC 30.26.065 Parking Lot Development Standards

SCC 30.26.065 describes many of the parking lot standards within its 19 subsections. In the context of reviewing the Urban Center submittal, the most important issue from this section is an error on Sheet A-053. This error states that drive aisles in parking lots can be 22' clear for compact parking stalls. Per Tables 30.26.065(14) and (16), drive aisles can be 22' only when there is

1. Angle parking of 70 degrees or less SCC; or
2. All of the parking is compact and the drive aisle is one-way.

Twenty five-foot drive aisles are required next to conventional stalls when there is two-way traffic. All of the parking shown on the submittal drawings is perpendicular parking, i.e. the angles are all 90 degrees. Many of the drive aisles shown to be just 22'; this implies that they will have one-way traffic and compact parking stalls.

Not always, see text

Aisle Criteria (SCC 30.26.065)

~~22'~~ clear for compact stalls

25' conventional stalls

Figure 16 – Incorrect Reading of SCC 30.26.065 found on Sheet A-053

Up to 40% of the stalls may be compact and the compact stalls must be individually marked on the site plan (SCC 30.26.065(10)). While the compact stalls are not marked, we can deduce that some areas are for compact and others for conventional parking based on the dimensions of the parking areas. Overall, each parking floor must have at least 60% of the stalls as conventional stalls and conventional stalls must have 25' drive aisles. It is therefore not possible to have as many 22' drive aisles or compact stalls as shown (see Figure 17, below).

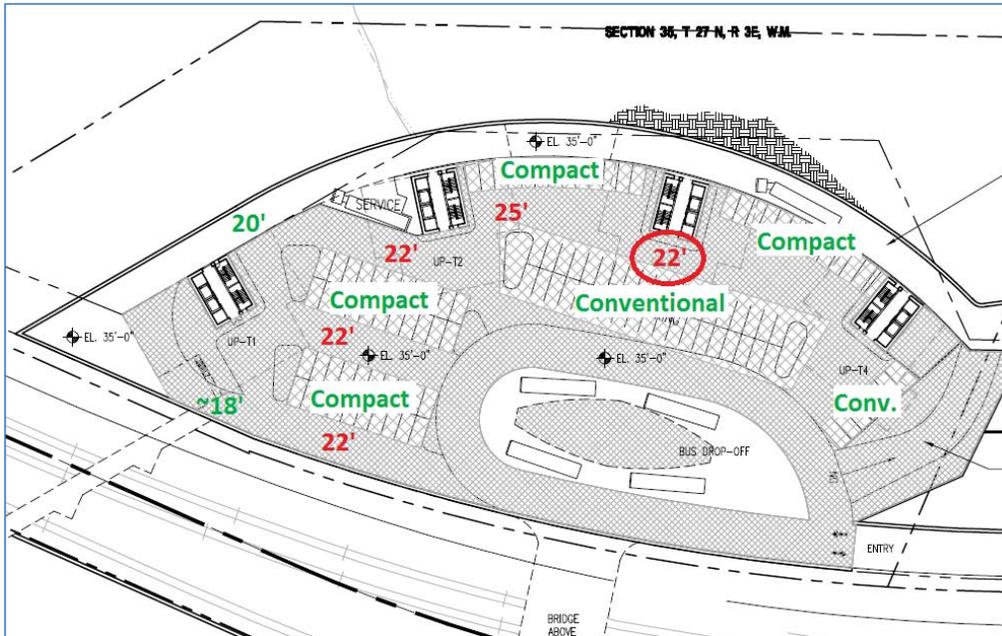


Figure 17 – Illustration of Parking Type and Drive Aisle Width adapted from Sheet A-100.

Additional problems with parking design occur throughout the submittal drawings. The garage plan for the North Village (Sheet A-054) is especially problematic and shows some of the other types of errors. These include trying to fit parking areas and drive aisles into areas where they cannot meet code requirements and proposing stalls with less than the 8' minimum necessary for compact parking. See Figure 18, next page.

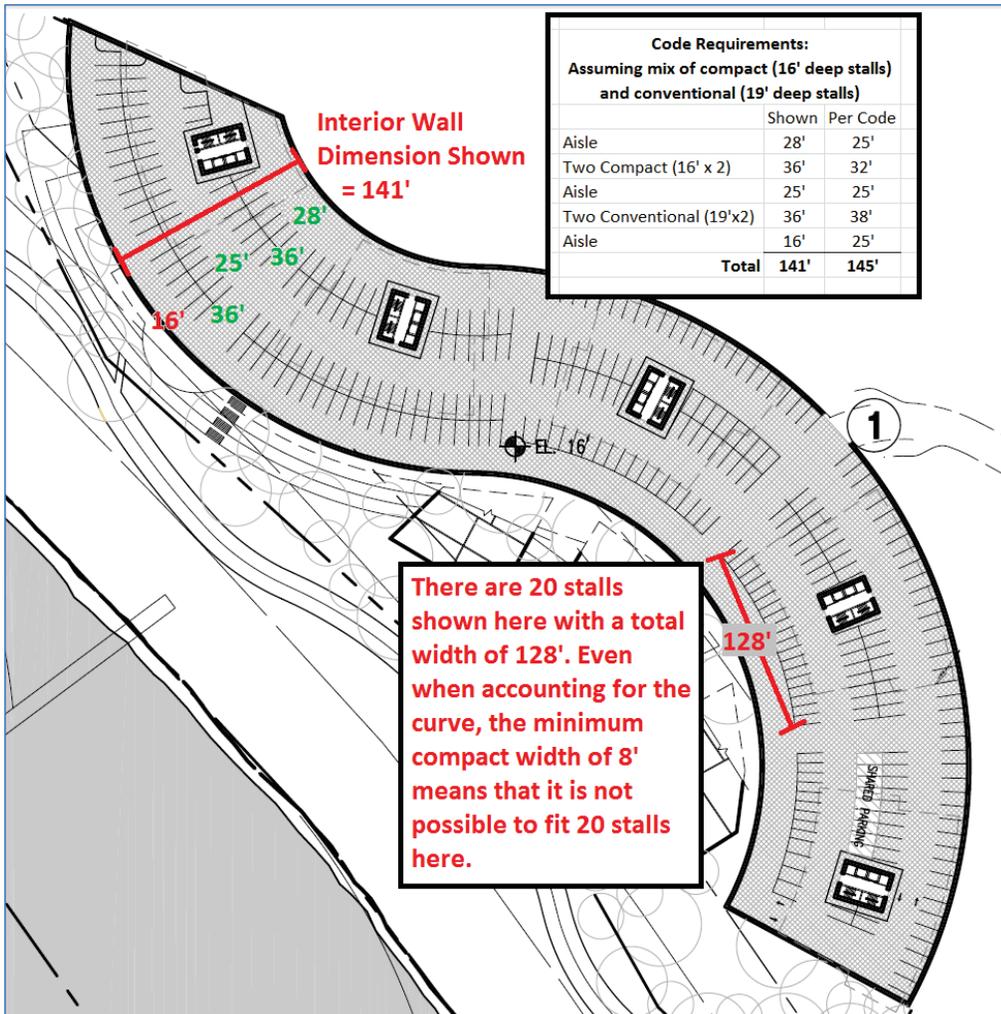


Figure 18 – Examples of Additional Parking Problems Adapted from Sheet A-054

The parking design will need thorough secondary review following a resubmittal that addresses the problems identified above.

SCC 30.26.070 Parking Lot Surfacing Requirements

This section does not apply until after construction and before certificate of occupancy.

SCC 30.26.075 Illumination

This section does not apply until review of construction plans.

SCC 30.26.080 Landscaping Requirement for Regulated Parking Areas

This section gives a cross-reference to Chapter 30.25 SCC General Development Standards – Landscaping. See especially review of SCC 30.25.022 Parking Lot Landscaping. (add cross-reference when written)

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