



DAVID EVANS
AND ASSOCIATES INC.

MEMORANDUM

DATE: May 15, 2018

TO: Paul MacCready, Principal Planner/Project Manager, Snohomish County
Departments of Planning & Development Services and Public Works
Snohomish County
3000 Rockefeller Ave, Everett, WA 98201

FROM: Kirk Harris, PE, PMP

SUBJECT: Response to Point Wells Urban Center Supplemental Staff Recommendations, May 9, 2018

PROJECT: PARA0000-0004
Point Wells Urban Center

CC: Jacque St. Romain, J. Dino Vasquez, Gary Huff, Doug Luetjen with KTC; Dan Seng, Carsten Stinn with Perkins + Will

***County Comment No. 6. Failure to Provide Adequate Parking
Subsection: Inadequate Number of Stalls***

Response to this Issue:

The Applicant has proposed an adequate number parking stalls with respect to Senior Housing contrary to the review comment provided by the County. The parking design meets with the code under which the project is vested, which is Senior Housing at 0.5 parking stalls per dwelling unit. For background information on the response to this issue as it relates to project's traffic study, parking calculations and the definitions of "senior housing" and "retirement housing", the following is provided:

The 2016 Expanded Traffic Impact Analysis (2016 ETIA) report for the Point Wells Mixed-Use Development project identified that specific buildings in the Central Village and North Village would be categorized as *Senior Adult Housing – Attached*. Within the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (9th Edition, 2012) this specific categorization is identified as Land Use Code (LUC) 252 and is defined as follows:

**G-25 Memo from Kirk Harris to MacCready re Response to Point Wells Urban Center Supplemental Staff Recommendation
PFN: 11 101457 LU**



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Snohomish County

SUBJECT: Response to Point Wells Urban
Center Supplemental Staff
Recommendations, May 9, 2018

Land Use: 252 Senior Adult Housing—Attached

Description

Senior adult housing consists of attached independent living developments, including retirement communities, age-restricted housing and active adult communities. These developments may include limited social or recreational services. However, they generally lack centralized dining and on-site medical facilities. Residents in these communities live independently, are typically active (requiring little to no medical supervision) and may or may not be retired. Senior adult housing—detached (Land Use 251), congregate care facility (Land Use 253) and continuing care retirement community (Land Use 255) are related uses.

The same definition for LUC 252, *Senior Adult Housing – Attached* is included in ITE Parking Generation (3rd Edition, 2004), a report for forecasting the parking demand associated with various land use types using information from parking demand studies.

The ITE Description of LUC 252, *Senior Adult Housing – Attached* does not include a specific minimum age associated with retirement communities or a specific age associated with age-restricted housing. However other documentation associated with ITE identifies age 55 as the year associated with age-restricted housing.

An article titled “Trip Generation Characteristics of Age-Restricted Housing”, by Thomas Flynn, PE, PTOE and Andrew Boenau, EIT, included in the ITE Journal (February 2007) states “*Age-Restricted housing, essentially for persons 55 and older, has become a popular component of many new residential developments. As a background for the use of age 55 as the benchmark for the senior adult housing categorization, it cites that the Housing for Older Persons Act of 1995 (HOPA) eliminates the requirement for 55 and older housing to have “significant facilities and services designed for the elderly” and establishes a “good faith reliance” immunity from certain damages relating to discrimination. HOPA further states that the intent of the housing must be demonstrated to serve persons 55 and older. That is, property will not violate the Fair Housing Act if it excludes families with children, but it does have to do so as long as 80 percent of occupied units have one occupant aged 55 or older.*

A presentation made at the 66th Annual Meeting of the ITE (in 1996) titled “Senior Housing Trip Generation and Parking Demand Characteristics” made by Stephen Corcoran, PE, notes that Senior Single Family Homes and Senior Apartments are for persons *with a minimum age requirement of 55 years old.*



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Snohomish County indicates in its review comment letter dated May 9, 2018 that the possibility exists for manipulation of the age-restrictions placed on specific housing units or complexes by families that have only one person that is 55 years old and several others that are not as old. A way in which this manipulation may be eliminated is identified in the “Trip Generation Recommendations Report” prepared by Kimley-Horn (October 2014) for the Florida Department of Transportation (FDOT) which evaluates *retirement communities (that) are an increasingly common land use type in Florida. Many of these developments are age restricted communities via deed restriction, in which at least one owner in each residence must be aged 55 or older and no permanent residents younger than 19 years of age are allowed.*

Snohomish County notes that it adopted legislation in 2013 clarifying that “Senior Housing” for the purpose of compliance with parking regulations encompass both “Retirement Apartments” and “Retirement Housing”. These types of dwelling units, which have been defined in the SCC since 2003, are limited for use by senior citizen residents 62 years of age or older in accordance with the requirements of state and/or federal programs for senior citizen housing.

The County’s definitions of “Senior Housing” by way of “Retirement Housing” and “Retirement Apartments” is generally different from the ITE’s definition of “Senior Housing” in two principal aspects: 1) the difference in age-restrictions for housing [62 years (SCC) and 55 years (ITE)], and 2) the difference in demographics between “retired” or “senior citizen” (SCC) and “active adult communities” (ITE). With respect to how the numbers of traffic trips generated to and from the project site by those that live in “Senior Adult Housing” are determined, traffic analysis for the Point Wells project is obligated to use ITE’s nationally recognized trip generation rates for this type of land use (LUC 252). Based upon other information associated with ITE, this land use (LUC 252) is generally accepted as being a dwelling unit lived in by one or more persons 55 years or older.

The County comments note that “the project is vested to the parking ratios in Table 30.34A.050(1) [2010]”, which indicate that a minimum of 0.5 stalls per unit are required for “Senior Housing”. Therefore County’s concurrent assertion that the Applicant’s parking must meet the current code requirement of 1.0 stalls per unit for “Retirement Housing” as identified in Table 30.26.030(1) Number of Parking Spaces Required is contradictory to its statement about the project’s vesting to the old code associated with “Senior Housing”. As such, the project does not have a parking deficiency of 546 stalls, does not conflict with SCC 30.34A.050 [2010], and is in compliance with providing the minimum number of required parking stalls for the “Senior Housing” category.

Attachments/Enclosures: ITE definition of Senior Adult Housing: Trip Generation Manual 9th Edition; ITE definition of Senior Adult Housing: Parking Generation, 3rd Edition

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Land Use: 252

Senior Adult Housing—Attached

Description

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Additional Data

The peak hour of the generator typically did not coincide with the peak hour of the adjacent street traffic. The A.M. peak hour of the generator typically ranged from 8:30 a.m. to 12:00 p.m. and the P.M. peak hour of the generator typically ranged from 1:00 p.m. to 6:00 p.m. **It should also be noted that in some cases, because of the limited sample size and variation in the data received, the projected trip generation estimate for the independent variable “dwelling units” exceeds the trip generation estimate for the independent variable “occupied dwelling units”. By definition, this is impossible; therefore, knowledge of the project site and engineering judgment should be used to select the appropriate trip generation approximation.**

The sites were surveyed between the 1980s and the 2000s in California, Illinois, Maryland, New Hampshire, New Jersey, Pennsylvania and Canada.

Source Numbers

237, 272, 501, 576, 602, 703, 734, 741

Land Use: 252

Senior Adult Housing—Attached

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Database Description

The database consisted of two study sites.

- The study sites had 46 and 91 dwelling units.
- Parking supply ratio: 1.2 and 1.4 spaces per dwelling unit, respectively.
- Weekday peak parking demand ratio: 0.50 and 0.33 parked vehicles per dwelling unit at the 46- and 91-unit sites, respectively.
- Saturday peak parking demand ratio: 0.50 and 0.34 parked vehicles per dwelling unit at the 46- and 91-unit sites, respectively.

Parking demand counts were submitted for the hours beginning at 9:00 a.m., 10:00 a.m., 2:00 p.m. and 5:00 p.m. From these limited data, no definitive peak hour or peak period was established.

Study Sites/Years

Huntington Beach, CA (1989)