

May 5, 2020

To: Gresham Design Commission

From: Carol Rulla

RE: Public Comments for 20-26000001
Albertina Kerr Proposed 150-unit apartment building

I am writing to express concerns about the proposed Exceptions to Minimum Parking Space Standards (GCDC 9.0851) and also to ask that the record be kept open to a date-certain after the hearing to allow for public comments to respond to staff & applicant information presented at the hearing, in keeping with DLCD recommendations and the opportunities that would normally be available if public testimony were allowed during the hearing.

Concerns about Exception to Minimum Parking Standards (9.0851)

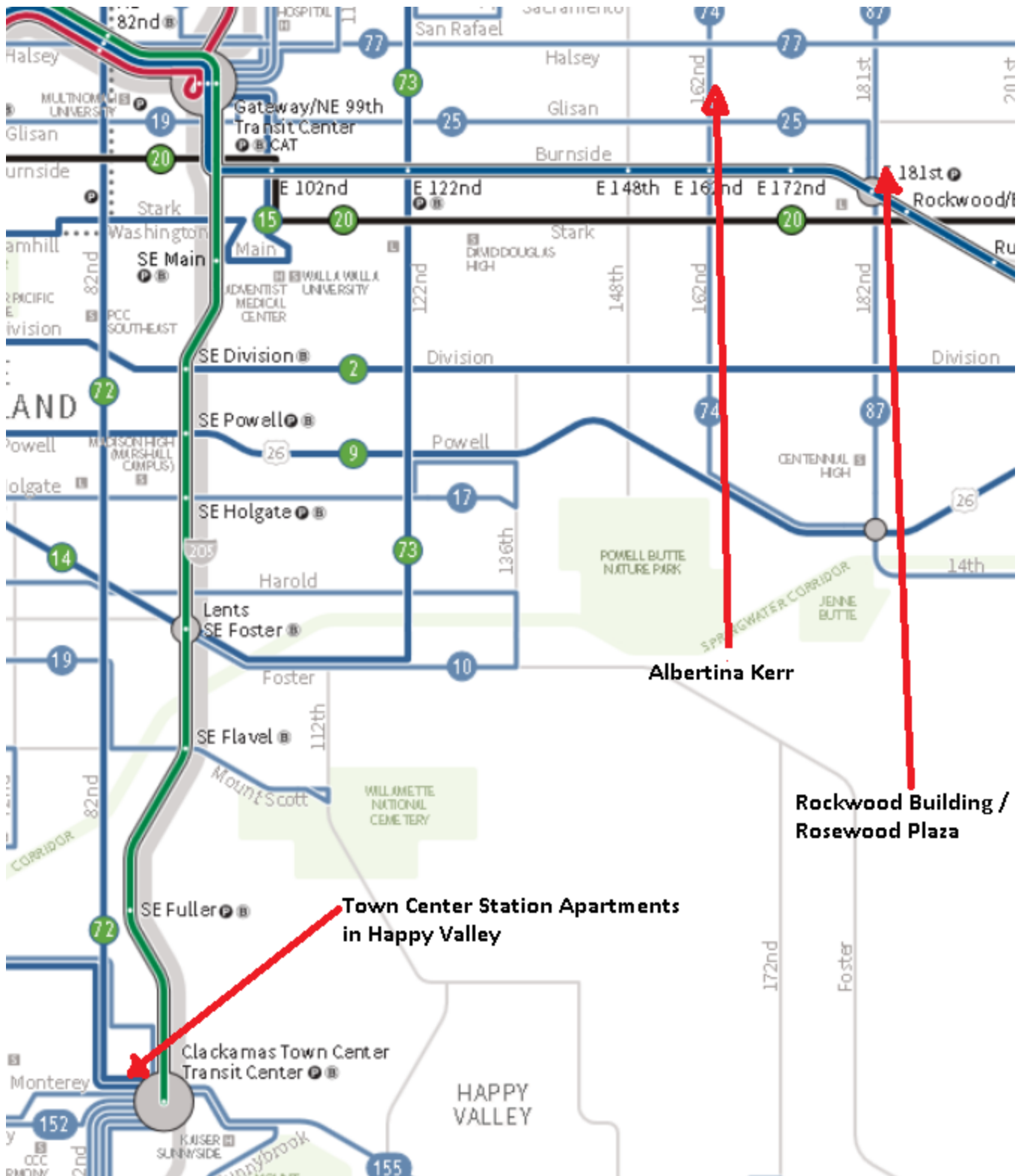
The applicant's parking study has some deficiencies in the projects chosen for comparison to the proposed Albertina Kerr project, including unequal access to transit, differences in project sizes and failure to acknowledge the high parking supply utilization for Albertina Kerr.

- **Comparison Projects have better access to transit than Albertina Kerr.**
 - **Town Center Station Apartments** in Happy Valley are next to the Clackamas Town Center Mall with access to multiple bus lines, including 2 frequent buses, and near the Clackamas Town Center Transit Center with access to the MAX Green Line.
 - **The Rockwood Building** and **Rosewood Plaza** are actually abutting Human Solution developments and have close access to the MAX Blue Line and 2 non-frequent buses and ¼-mile access to a frequent bus.
 - **Albertina Kerr** has a bus stop for the non-frequent Line 74-162nd bus, approximately ¼-mile access to 2 other non-frequent buses and ½-mile access to the MAX Blue Line.

Transit Options	Town Center Station	Rockwood Building / Rosewood Plaza	Albertina Kerr
MAX Line	Within ½ mile	Within 1/10 mile	½ mile away
Frequent Bus	2 within 1/10 mile	1 within ¼ mile	None
Non-Freq. Bus	9 within 1/10 mile	2 within 1/10 mile	1 at site; 2 ~¼ mile away

See the screenshot on the next page for the TriMet System Map showing the location of the “three” comparison projects vs. Albertina Kerr.

Comparison Projects Have Better Access to Frequent Transit than Albertina Kerr



As would be expected, Town Center Station Apartments in Happy Valley with the best access to transit has lower parking demand than The Rockwood Building and Rosewood Plaza, as shown in the parking study's Table 2. Parking Demand Results (p.3).

The applicant's parking study determines that Peak Weekday Demand will be the determining factor for parking for Albertina Kerr's combined residential and existing needs. To make an adjustment for Albertina Kerr's its lesser access to frequent transit relative to the comparison projects, I propose calculating an estimated increased Peak Weekday Demand based on the study's comparison projects.

Table 2's Average and Peak Weekday Demand for The Rockwood Building are only for the hours of 5AM-8AM and 6PM-10PM, and the differential between its Average (0.69) and the Peak (0.62) is much smaller than the differential for the Average and Peak for Town Center Station (0.53 vs. 0.65) and Rosewood Plaza (0.62 vs. 0.77). It seems a comparison between Town Center Station Apartments and Rosewood Plaza might be used to estimate the effect of better transit on the demand for parking.

	Average Weekday Parking Demand	Peak Weekday Parking Demand
Town Center Station	0.53 spaces per unit	0.65 spaces per unit
Rosewood Plaza	0.62 spaces per unit	0.77 spaces per unit
Estimated Extra Parking Demand due to Worse Transit Options	0.09 spaces per unit	0.12 spaces per unit

Assuming Albertina Kerr's lesser access to frequent transit translates to a parking demand somewhat proportional to the differential between Town Center Station and Rosewood Plaza, it seems that at least 0.10 more spaces per unit (and perhaps more) would be needed above Rosewood Plaza's weekday parking demand. This means Albertina Kerr's new residential Peak Weekday Demand is better estimated as at least 0.87 spaces per unit (0.77 + 0.10). **Using this 0.87 factor for Albertina Kerr's estimated Peak Weekday Demand indicates that regular peak parking demand is more likely to be at least 131 spaces (more than the proposed 129 spaces).**

- **Comparison Projects are significantly smaller than Albertina Kerr's project.** A small increase in the vehicle counts for these comparison projects translates into relatively more vehicles for the larger Albertina Kerr project. For the Rosewood Plaza Peak Weekday Demand, the addition of just one vehicle to its demand count increases its demand ratio from 0.77 to 0.81:

Rosewood Plaza	Calculated Peak Weekday Spaces Used	Number of Apartment Units	Peak Weekday Demand
Given in Study	20	26	.077 spaces per unit
+ 1 vehicle	21	26	0.81 spaces per unit
+2 vehicles	22	26	0.85 spaces per unit
+3 vehicles	23	26	0.88 spaces per unit

Note the greater difference these greater Peak Weekday Demand factors make in the estimate parking demand for Albertina Kerr’s 150-unit apartment building:

Albertina Kerr	Assumed Peak Weekday Demand	Number of Apartment Units	Calculated Peak Weekday Spaces Needed
Given in Study	.077 spaces per unit	150	116
+ 1 Rosewood vehicle	0.81 spaces per unit	150	122
+2 Rosewood vehicles	0.85 spaces per unit	150	128
+3 Rosewood vehicles	0.88 spaces per unit	150	132

Combining the estimated 0.10 factor for Albertina Kerr’s less frequent transit options with 1-2 more vehicles in the 26-unit Rosewood Plaza counts indicates that Albertina Kerr’s Peak Weekday Demand for its 150-unit apartment building could be 0.91-0.95 spaces per unit, which would translate to 137-143 vehicles (or 8-14 more spaces than the proposed 129).

- Albertina Kerr overall supply utilization is high (and likely an underestimate).**
 The parking study estimates that the overall campus maximum estimated demand is 220 spaces (116 for new apartments + 104 existing Peak Weekday Demand) with a 256 space supply (129 for new apartments + (176 - 49) for existing campus) for an overall peak weekday utilization of **86%, which would be color-coded orange** on the study’s parking utilization maps. The study doesn’t calculate the new supply utilization for the existing campus, which is estimated to be 82% (104 / (176 - 49)), which would also be color-coded orange on the study’s parking utilization maps.

Given that demand for the new apartments is likely greater than that calculated in the study, the overall campus supply utilization is likely higher than 86%. For the record, 86% is a higher utilization rate than the comparison projects, except the Rockwood Building with the mid-day non-residential uses:

	Peak Weekday Demand Ratio	Parking Supply Ratio	Peak Weekday Supply Utilization (Demand / Supply)
Town Center Station	0.65 spaces per unit	0.83 spaces per unit	78%
Rosewood Plaza	0.77 spaces per unit	1.07 spaces per unit	72%
Rockwood Building (all uses)	2.00 spaces per unit (per Exhibit 1 graph)	1.91 spaces per unit	105%
	Overall Demand	Overall Supply	
Albertina Kerr Campus (given in study)	220	256	86%
Albertina Kerr Campus (with +0.10 space / unit for less transit access)	235	256	92%
Albertina Kerr Campus (with +0.10 and 1 extra Rosewood vehicle)	241	256	94%
Albertina Kerr Campus (with +0.10 and 2 extra Rosewood vehicles)	247	256	96%

In conclusion, the proposed 45% reduction in the minimum parking requirements, especially when combined with the elimination of 49 existing parking spaces, will likely result in insufficient on-site parking to accommodate overall campus parking needs on weekdays and result in parking on neighborhood streets, most likely onto NE Holladay. The neighborhood association has valid concerns about additional on-street parking on Holladay where there are no sidewalks, which will force pedestrians (including school children walking to & from school) further into the middle of the street.

Some kind of mitigation is needed, either:

- A condition of approval to require more parking on the rest of the campus since that existing parking is being used to make up for the reduced parking for the apartments, or
- A condition of approval requiring a plan to monitor on-site parking and work with the neighborhood association to mitigate any problems that occur.

Request to Continue the Hearing to a Date-Certain to Allow Public Responses

Since the city is not allowing public comment during hearings, this hearing should be continued to a date-certain to allow public responses to information that is raised during the hearing. This would be in line with normal hearings where public testimony is taken after presentations by staff and the applicant and the public has an opportunity to respond to that information. It is also in line with the 4/7/20 Department of Land Conservation & Development's "Advice for Local Governments: Processing Land Use Applications During Oregon's Emergency Response to COVID-19":

*4. If a local government holds a public hearing to consider a land use application,... the local government... [should] make provisions to ensure that the meeting is open to the public and that the applicant and other parties have the ability to provide testimony on the application **and provide replies to new testimony introduced as part of the meeting proceedings.**"*

Reference:

https://www.oregon.gov/lcd/NN/Documents/20200407_AdviceForLocalGovernments_LandUseApplications_Covid-19_Response.pdf

Thank you for your consideration.



May 5th, 2020

RE: May 6th, 2020 Design Commission Meeting Public Comments for 20-26000001 Albertina Kerr
Proposed 150-unit apartment building

Subject matter: Albertina Kerr Workforce Housing Project proposed parking variance and possible impact on surrounding neighborhood streets.

The Wilkes East Neighborhood Association (WENA) is submitting comments for the May 6th, 2020 Design Commission Meeting regarding our concerns regarding parking variance.

WENA request that the record be left open to allow the public to respond to (1) staff's and the applicant's presentations during the hearing and the Design Commission's questions concerning those presentations (which normally happen before oral public testimony) and (2) the Commission's questions of the public (which would normally be asked during the public testimony period).

Please consider the following findings:

- “235 auto parking spaces are required per Table 9.0851 - Minimum/Maximum Auto and Bicycle parking.”
- “The proposal includes 129 parking spaces, which is a 45 percent reduction. The proposal also includes the elimination of 49 existing campus spaces that will be associated with the construction of the housing.”
- The proposed site draft indicates the parking lot driveway entrance will be located just east of NE 162nd on NE Holladay Street at a section of Holladay where there is an “S” curve that already can become easily congested with street parking, narrowing the flow of traffic to nearly one lane and limiting line of sight visibility. This congestion already occurs with normal residential and campus on-street parking. We ask that a designated a no parking zone starting from ten feet to the east of the driveway entrance to the NE 162nd intersection to help manage traffic flow on NE Holladay.
- Streets of NE Holladay and NE Hoyt both lack sidewalks. Street parking forces pedestrians to use the middle of the street. Any overflow parking along Holladay and Hoyt from the campus will have immediate impact on pedestrians, mail carrier delivery, garbage collection and street sweeping.
- It should be noted that NE Holladay sees both Reynolds High School and HB LEE Middle School students walking to and from bus stops and the school during school days. School bus and Tri-met Bus Stops are located on NE 162nd at Holladay Street.
- Overflow parking in front of residential homes may become a nuisance, should existing mailboxes or driveways are blocked or taking up parking spots to those who are accustomed to parking in front of their homes.

(Continued)



May 5th, 2020

RE: May 6th, 2020 Design Commission Meeting (continued).

Other considerations to the Parking Study, we have found the following deficiencies to the transit access comparisons reports.

(See the attached Tri-Met system map with indications of the locations of the "comparisons" & Albertina Kerr, plus screenshots of the nearby stops/stations for each location on the follow pages).

(1) Town Center Station Apartments ([8719 SE Monterey, Happy Valley](#)) is within 0.1 mi. of Clackamas Center Mall with access to 11 bus lines (2 are frequent service). It is also within 1/2 mi. of Clackamas Town Center Transit Center with access to the MAX Green Line.

(2) & (3) Rockwood Building & Rosewood Plaza ([124 NE 181st](#) & [18173 NE Couch](#)) are abutting developments, so they're not separate comparisons. They are within 1/10 mi. of MAX Blue Line, Line 87 and Line 25 (which is only limited, weekday only), and within 1/4 mi. of Line 20 (frequent service).

For comparison, Albertina Kerr's bus stop is on the Line 74 (which is the best frequency of the 3 nearby lines, but still less frequent & more limited times of day than frequent service lines or a MAX line). It is within 1/4 mi. of the limited Line 25, within 1/3 mi. of the Line 77, and 1/2 mi. of the MAX Blue Line.

The "comparison" projects have better transit access than Albertina Kerr, so their parking needs will be less and more parking spaces per unit are needed for Albertina Kerr. (See the attached Tri-Met system map with indications of the locations of the "comparisons" & Albertina Kerr, plus screenshots of the nearby stops/stations for each location.)

Granted, the current parking for Albertina Kerr currently has excess space. However, given that 49 spaces will be removed from the current 176 spaces, that leaves only 127 spaces for the existing uses. Per the applicant's parking study, 104 spaces were in use at noon on a Thursday, which is likely not a true maximum. So, there will likely be fewer than 23 "leftover" existing spaces for use by the new residents, especially if the existing uses see an increase in parking needs in the future.

WENA ask for conditions of approval requiring more parking spaces for the proposed new residential units, a dedication of a portion of the existing parking spaces (which would mean that those dedicated spaces could not be used to meet parking requirements for any future uses on the southern Albertina Kerr parcel) and a Good Neighbor Agreement with the NA to resolve any on-street parking issues that may occur in the future.

Comments Respectfully submitted

Greg Hartung, Land Use Co-Chair, Wilkes East Neighborhood Association.

503-734-5659



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Stops & Stations

Stops near 124 NE 181ST AVE, PORTLAND [Map](#)

- NE 181st & E Burnside Northbound** Stop ID 6914
0.04 miles away | [Walking directions](#)
Served by: 25, 87
- NE 181st & Davis Southbound** Stop ID 6912
0.07 miles away | [Walking directions](#)
Served by: 25, 87
- E 181st Ave MAX Station Eastbound** Stop ID 8353
0.08 miles away | [Walking directions](#)
Served by: MAX Blue
- NE 181st & Everett Ct Northbound** Stop ID 6918
0.1 miles away | [Walking directions](#)
Served by: 25, 87
- SE 181st & E Burnside Southbound** Stop ID 9061
0.11 miles away | [Walking directions](#)
Served by: 87

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- SE 181st & E Burnside Southbound** Stop ID 9061
0.11 miles away | [Walking directions](#)
Served by: 87

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Stops near 18173 NE COUCH ST, PORTLAND [Map](#)

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Stops & Stations

Stops near 18173 NE COUCH ST, PORTLAND [Map](#)

- NE 181st & E Burnside Northbound** Stop ID 6914
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Served by: 25, 87
- E 181st Ave MAX Station Eastbound** Stop ID 8353
0.07 miles away | [Walking directions](#)
Served by: MAX Blue
- NE 181st & Davis Southbound** Stop ID 6912
0.09 miles away | [Walking directions](#)
Served by: 25, 87
- NE 181st & Everett Ct Northbound** Stop ID 6918
0.11 miles away | [Walking directions](#)
Served by: 25, 87
- E Burnside & E 181st Ave Park & Ride Eastbound** Stop ID 13345
0.12 miles away | [Walking directions](#)
Served by: 25

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Stops & Stations

Stops near 8719 SE MONTEREY AVE, Happy Valley [Map](#)

- Clackamas Town Center Mall Westbound** Stop ID 12922
0.1 miles away | [Walking directions](#)
Served by: 29, 30, 31, 33, 34, 71, 72, 79, 152, 155, 156
- SE 90th & Monterey Southbound** Stop ID 8467
0.1 miles away | [Walking directions](#)
Served by: 71
- Clackamas Town Center Mall Eastbound** Stop ID 12921
0.1 miles away | [Walking directions](#)
Served by: 29, 30, 31, 33, 34, 71, 72, 79, 152, 155, 156
- SE 90th & Monterey Northbound** Stop ID 8659
0.1 miles away | [Walking directions](#)
Served by: 71
- 8800 Block SE Causey Eastbound** Stop ID 987
0.17 miles away | [Walking directions](#)
Served by: 71

Comparison Projects Have Better Access to Frequent Transit than Albertina Kerr

