

May 27, 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 make final comments about the parking study that has been submitted for the proposed Exceptions to Minimum Parking Space Standards (GCDC 9.0851). I want to make clear that I support Albertina Kerr's overall proposal to provide workforce housing, but the concern is with the underlying assumptions in the parking study and the likely problems that will arise from overflow parking, especially onto NE Holladay. I do appreciate that staff and the Commission had more discussion of the public comments at the 5/20/20 continued hearing, but **the deficiencies in the parking study still haven't been addressed.**

### **Parking Study Deficiencies Still Not Addressed**

Staff noted that comparable income of tenants was a more reliable indicator of the need for parking than access to transit. While that is true, what was unsaid but implied in that statement is that **transit access matters, too**. My intent in asking for comparable projects with similar access to transit was:

- Are there not other affordable housing projects with similar access to transit to Albertina Kerr's transit access that could be used as comparisons? If not, why isn't an adjustment being made to account for Albertina Kerr's poorer transit access?

### **These other problems with the parking study haven't been addressed at all:**

- Why wasn't a true third project used to estimate parking demand?
- Are there not larger projects that could be used as comparisons so that small changes in the number of parked vehicles would have less effect on the parking demand ratio?
- Why was the Albertina Kerr data not taken throughout the day like the other data?
- If a more limited count needed to be done, why was Albertina Kerr's weekday count taken at noon, instead of at 11am or even in a range of times like 10am-2pm, so that a true peak for the day could be determined?

### **Albertina Kerr's High Parking Supply Utilization**

Staff indicated that the comparison of the other projects' peak demand ratios vs. parking supply ratios was an important factor. That comparison is the supply utilization in the study.

Staff's vague comments about the other projects' supply utilization failed to address some important points:

- **Neither staff nor Kittelson has indicated what the upper limits should be on an estimated supply utilization percentage.** Given that a parking study only captures limited data and cannot absolutely measure peak demand, there should be a recommended percentage range that shouldn't be exceeded if on-site supply is to accommodate peak demand. If you use the color-coding in Kittelson's study, then the Albertina Kerr utilization will be at least an orange level, and if corrections are made for the deficiencies in the study, the utilization is likely in the highest 90%-100% red level.
- **Comparing the residential-only parking supply utilization for Town Center Station and Rosewood Plaza to the campuswide parking supply utilization for Albertina Kerr is a bit of an apples-to-oranges comparison.** Per staff, the applicant is assuming that parking demand for the new apartments will never exceed the proposed 129 spaces. No evidence has been given for this assumption, but using the weekday demand calculated in the study (without any corrections) gives a high 90% (red) utilization rate for the Albertina Kerr apartments:

Residential-Only Parking Supply Utilization	Peak Weekday Demand Ratio	Parking Supply Ratio	Peak Weekday Supply Utilization (Demand / Supply)
<b>Town Center Station</b>	0.65 spaces per unit	0.83 spaces per unit	<b>78%</b>
<b>Rosewood Plaza</b>	0.77 spaces per unit	1.07 spaces per unit	<b>72%</b>
	<b>Peak Demand</b>	<b>Parking Supply</b>	
<b>Albertina Kerr Apts.</b> (given in study)	116*	129	<b>90%*</b>

\* No adjustment made for the likely underestimate of the Albertina Kerr parking demand.

- **No comparison is possible for The Rockwood Building's residential-only parking supply utilization.** It is nonsensical for staff to include The Rockwood Building when pointing to the study's parking supply ratios (Table 1) compared to the estimated peak parking demand ratios (Table 2). For The Rockwood Building, Table 1 gives a combined parking supply ratio for residential and non-residential users – plus the study adds in 4 on-street parking spaces -- which cannot be compared to Table 2's calculated estimate of The Rockwood Building's residential-only peak parking demand ratio.
- **The combined parking supply utilization for The Rockwood Building's residential and non-residential users shows that the city allowed that project to be built without enough parking spaces to meet combined parking demand of all users,** even when 4 on-street parking spaces are counted as part of the parking supply. Given the deficiencies in the Albertina Kerr parking study, I question whether its proposed overall campus supply will be enough for all users on weekdays, as the applicant claims.

Please take another look at The Rockwood Building's overall peak parking supply utilization and then compare that to the estimates for Albertina Kerr's overall peak parking supply utilization, including the effects on the residential demand calculations with just a 0.10 increase in assumed parking demand ratio and adding 1-2 extra vehicles to the Rosewood Plaza parking demand. Note: These estimates exclude the effect of the likely underestimated peak parking demand for the existing campus that results from the choice to take daytime data only at noon:

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

**Neighborhood Concerns are with Future On-Street Parking, particularly on NE Holladay**

I appreciate that one commissioner (Orth?) took another visit to the site. I appreciated that he disclosed that he had conversations with some of the neighbors since those were ex parte contacts that needed to be declared. I would ask which streets were discussed and whether there was any discussion about potential on-street parking from the proposed 150-unit apartment building with 129 parking spaces, especially potential parking on Holladay near its intersection with 162<sup>nd</sup>. It is that section of Holladay which is most likely to be affected by overflow parking from the new apartments. Please note that **the concern is not with current on-street parking from Albertina Kerr; it is with future on-street parking after the apartments are built if more on-site parking isn't provided.**

**On-street parking in the section of Holladay near 162nd is concerning** because of conflicts with:

- pedestrians (particularly school children) walking in the street,
- the proximity of the intersection where higher speed vehicles turn onto Holladay,
- the curve in Holladay on its approach to the intersection,
- the proposed new Albertina Kerr driveway near the intersection.

Staff has noted that on-street parking can help slow traffic down due to the reduction in the available roadway width, but that is unlikely to help when higher speed traffic turns off of 162<sup>nd</sup> and encounters pedestrians – particularly kids – walking in the middle of the street.

I respectfully ask you to question all of the deficiencies in the submitted parking study and to ask for some condition of approval to address the likely problems that will arise from the insufficient parking that is being proposed.

Thank you for your consideration.

May 27, 2020

RE: 20-26000001

Dear Design Commission,

Access to Halsey and Glisan Streets were not addressed in the Design Commission Hearing for Albertina Kerr. With the condition of 162<sup>nd</sup> Ave and no sidewalks, it is not safe to walk to transit.

The comparison on the parking study to the Rockwood Building is not comparable. It is a lot smaller complex with the MAX line one block away. The parking lot at the Rockwood Building has always had problems for available parking spaces. The main complaint I receive is the lack of parking at the Rockwood Building especially mid-morning to mid-afternoon.

I do not have an objection to the apartment complex. My concerns are that the residents that live there will have safe access to public transportation on Glisan, Halsey, and the MAX line on Burnside. Lower income people rely on public transit. Surveys in Rockwood show that more than 50 percent of the residents rely on public transportation. I want to make sure that the residents can get to public transportation to get to work, school, medical appointments, etc.

Please consider another look at the parking study and require it to compare with larger, more comparable size units in an area with less access to transit.

Sincerely,

Catherine Nicewood

Rockwood President