



CITY OF KIRKLAND
Planning and Building Department
123 Fifth Avenue, Kirkland, WA 98033
425-587-3600 - www.kirklandwa.gov

SUMMARY OF DECISION - PARKING MODIFICATION

Date: December 12, 2023
Project Name: Modera Bridle Trails
File No.: TRAN23-00292
Applicant: Mill Creek Residential
Project Planner: Tony Leavitt, Senior Planner
Decision: ☐ Denied
☐ Approved
☒ Approved with Conditions

I. CONDITIONS OF APPROVAL

The applicant's request for a parking modification to reduce the number of required resident and guest parking stalls from 558 to 401 stalls and shared parking stalls for the onsite commercial and residential guests for the Modera Bridle Trails project is approved subject to the following conditions:

- A. The application is subject to the applicable requirements contained in the Kirkland Municipal Code, Kirkland Zoning Code (KZC), and Building and Fire Code. It is the responsibility of the applicant to ensure compliance with the various provisions contained in these ordinances.
- B. As part of the building permit application, the applicant shall submit:
 1. Plans consistent with the approved parking modification.
 2. A Transportation Management Plan (TMP) for review and approval by the City. The TMP shall include the items required as part of the SEPA (see Attachment 12) and the following parking elements:
 - a. Allocate 24 parking spaces for the commercial use. These parking spaces may be shared by all users (residents and/or their visitors) between 7 P.M. and 6 A.M. on weekdays and all day on weekends. These parking spaces shall not be gated nor assigned to the apartment tenants. Plans shall include signage.
 - b. Allocate 40 parking spaces for visitors. Guest parking stalls located in a common area shall not be leased or assigned to residents. Guest parking stalls shall not be gated and shall be accessible to guests 24 hours per day. Plans shall include signage.
- C. Prior to issuance of the building permit, the City and the applicant shall finalize a parking covenant on a form approved by the City, which shall include acknowledgement that it is a violation of this code to deviate from the conditions

under which the City approved the parking modification. The parking covenant shall establish the conditions under which the City approved the parking modification and shared parking.

- D. Prior to final inspection of the building permit by the Planning and Building Department, the applicant shall:
 - 1. Complete or install all required elements of the TMP.
 - 2. Submit to the City a signed and notarized TMP (including the recording fee) for recording with King County as part of the covenants, conditions and restrictions of the project to assure its implementation. The TMP shall run for the duration of the building, and shall be binding on the heirs, successors and assignees of the parties.
 - 3. Submit to the City a signed and notarized parking covenant (including the recording fee) for recording with King County as part of the covenants, conditions and restrictions of the project to assure its implementation. The parking covenant shall run for the duration of the building and shall be binding on the heirs, successors and assignees of the parties.
- E. Any future conversion of the residential amenity space to commercial space will require SEPA (State Environmental Policy Act) and building permit reviews.
- F. Failure to comply with the Conditions of Approval shall result in code enforcement pursuant to KMC 1.12 and/or revocation of occupancy permits pursuant to KMC 21.06.550.

II. **GENERAL INFORMATION**

- A. Location: The subject property is located at 13033 NE 70th Place (see Attachment 1).
- B. Existing site conditions: The subject property (approximately 2.9 acres) is currently developed with two commercial buildings. The applicant is proposing to construct a 5-story mixed use project with approximately 368 residential units and 7,000 square feet of retail space. Parking is proposed within a parking structure below the building. Vehicular access to the property is from 130th Avenue NE and NE 70th Place.
- C. Description of the proposal: The applicant has requested approval of a parking modification pursuant to Kirkland Zoning Code (KZC) 105.103.3.c to reduce the number of required parking stalls from 558 to 401 stalls for the proposed residential use. The proposal also includes sharing the onsite commercial parking stalls with residential tenants and guests.

III. **BACKGROUND INFORMATION**

KZC Section 105.103.3.c allows an applicant to request a reduction of the required number of parking stalls based on a parking study prepared by a licensed Transportation Engineer. The scope of the study shall be proposed by the Transportation Engineer and approved by the City's Transportation Engineer. The study shall provide at least two days of data for morning, afternoon and evening hours, or as otherwise approved or required by the City's Transportation Engineer. Approval of a parking reduction shall be solely at the discretion of the City.

A decrease in the minimum required number of spaces may be based in whole or part on the provision of nationally accepted TDM (transportation demand management) measures. Data supporting the effectiveness of the TDM measures

shall be provided as part of the parking demand and utilization study and approved by the City Transportation Engineer.

Pursuant to KZC Section 35.40 DS-2, within the BCX zone a parking modification to decrease the required number of spaces for attached or stacked dwelling units is not required to increase the parking supply 15 percent over demand per KZC 105.103(3).

The scope of the parking study was approved by the City's Transportation Engineer. Below is a list of items reviewed as part of the parking modification request.

- Parking Modification Request dated April 13, 2023 prepared by Heffron Transportation (see Attachment 2)
- Parking Modification Request dated June 15, 2023 prepared by Heffron Transportation (see Attachment 3)
- Parking Modification Letter dated August 4, 2023 prepared by Jessica Clawson of McCullough Hill (see Attachment 4)
- Parking Modification Request dated November 30, 2023 prepared by Heffron Transportation (see Attachment 5)
- Parking Modification Analysis Staff Review Memorandum prepared by Thang Nguyen, City Transportation Engineer dated December 1, 2023 (see Attachment 6)

IV. PUBLIC COMMENT

KZC Section 105.103.3.c requires that notice of a parking modification request be distributed to owners and residents within 300 feet of the subject property prior to a decision by the Planning Official. The public comment period ran from November 7, 2023 to November 14, 2023 during which the City received 3 comments letter (see Attachments 7 through 9). Two of the letters were against the proposed modification and one letter was in support of the modification. Additionally, the applicant provided a comment response letter (see Attachment 10). Below is a summary of public comments followed by a brief staff response. Due to a change in the parking modification request, an additional notice was sent out on December 1, 2023 with a deadline of December 8, 2023. During this comment period, Staff received another email from a previous commenter (see Attachment 11)

Comments: Two of the letters raised concerns about the spillover parking impacting the neighboring Bridle Trails Shopping Center. Additionally, one of the letters states that the code authorizes a discretionary parking reduction only when the proposed reduced parking is "sufficient to fully serve the use." The commenter contends that the proposed parking does not fully serve each use within the project and that the data does not support a reduction.

Staff Response: KZC Section 105.103.3.c states that a decrease in the required number of spaces may be granted if the number of spaces proposed is documented by an adequate and thorough parking demand and utilization study to be sufficient to fully serve the use.

The applicant submitted a thorough parking study that was reviewed by the City's Transportation Engineer. The parking study review determined the appropriate parking rate per unit based on similar projects and concluded that the parking is

sufficient to fully serve the use. Additionally, the City is requiring the applicant to implement Transportation Management Plan (TMP) elements that will help to prevent impacts on neighboring properties. The TMP includes a requirement that if there are any complaints from the nearby residents or businesses about spillover parking by the proposed development, the building owner or building manager shall hire a third-party transportation engineer consultant to conduct a spillover parking study and develop and implement mitigation strategies to address spillover parking.

V. ANALYSIS

The subject property is zoned BCX. In the BCX zone, a residential use must provide a minimum of 1.2 stalls per studio unit, 1.3 stalls per 1-bedroom unit, 1.6 stalls per 2-bedroom unit and 1.8 stalls for all units 3 bedrooms or larger.

KZC 105.20.3.a requires that a minimum ten (10) percent of the total number of required parking spaces be provided for guest parking and located in a common area accessible by guests.

Commercial parking is required to provide 1 stall per 300 square feet of gross floor area.

The following table summarizes the parking requirement for the proposed development:

<u>Proposed Development</u>	<u>Number of Units</u>	<u>Number of Bedrooms</u>	<u>KZC Parking Rates (per KZC Section 35.40)</u>	<u>Number of Parking Spaces Required</u>	<u>Proposed</u>	<u>Deficit</u>
Studio Units	64 units	64	1.20 per unit	76.8		
One Bedroom Units	202 units	202	1.30 per unit	262.6		
Two Bedroom Units	83 units	166	1.60 per unit	132.8		
Three Bedroom Units	19 units	57	1.8 per unit	34.2		
Sub-Total	368	489	1.38 per unit or 1.04 per bedroom	507 (506.8 rounded up)		

Guest Parking, <i>KZC 105.20</i>			10% of Required Parking	51		
Multifamily Total				558	401	-157
Commercial	7,000 sf		1 per 300 Square feet	24	24	0
Total				582	425	-157

The proposed development has a parking deficit of 157 stalls.

KZC Section 105.103.3.c allows a decrease in the number of required parking stalls if the number of spaces proposed is documented by an adequate and thorough parking demand and utilization study to be sufficient to fully serve the use.

Heffron Transportation reviewed four parking datasets to determine whether the proposed parking supply is adequate for the proposed development: the King County Right Size Parking calculator, the Bothell dataset, the Kirkland and Redmond dataset, and the dataset for the Spring District & Overlake sites.

The King County Right Size Parking calculator dataset was not accepted by the City's Transportation Engineer as the data from which the calculator used was found to be biased towards the Seattle metropolitan area and is not representative of Kirkland's transportation environment and parking demand.

The City's Transportation Engineer concluded that the Bothell dataset was not applicable as the developments in Bothell are half the size of the proposed development and the apartments are close to a major regional highway with better transit services than the proposed project.

The Kirkland & Redmond dataset included a total of 36 sites, but only 34 of the sites included bedroom counts. The datasets show that 18 out of 34 of the sites have a parking demand less than 0.71 spaces per bedroom and all the sites have a parking demand of less than 1.0 space per bedroom.

Due to the fact that the Kirkland and Redmond dataset sites have a significantly different unit mix than the proposed project, additional data was collected at six sites in the Spring District & Overlake areas that have the similar unit mix as the proposed project. The City's Transportation Engineer concluded that these sites have an average parking demand of 0.84 spaces per unit and 0.64 spaces per bedroom and this set of data provides a better representation of the parking demand based on the unit mix.

The combined parking study data sets for the Kirkland, Redmond, Spring District and Overlake sites show a parking demand rate of 0.70 spaces per bedroom. The City's Transportation Engineer has determined that this is minimum rate per bedroom required for the proposed project. The project is proposing a higher rate of 0.738 stalls per bedroom.

The following table summarizes the resulting data.

Combined Parking Study Datasets	Number of Sites Surveyed	Parking Demand Rate	Bridle Trails Metric	Resulting Parking Demand
Kirkland, Redmond, Spring Dist., and Overlake combined dataset	40	0.70 per bedroom	489 bedrooms	343

Based on this analysis, the City's Transportation Engineer has concluded that the data supports a reduction in the amount of parking required for the residential use and recommends approval of the proposed residential parking modification of 0.738 stalls per bedroom (exclusive of visitor parking) as it exceeds the 0.70 parking rate per bedroom established in the datasets.

Based on the 343 minimum required resident stalls, the project would need to provide at least 35 guest parking stalls to meet the requirements of KZC Section 105.20.3. The project is proposing 40 guest parking stalls.

The project will be required to provide the proposed 401 residential parking spaces (361 for the residents and 40 for residential visitors) and the required 24 parking spaces for the commercial. In addition, the commercial parking should be shared with the residents and their visitors after 7 PM or after business hours every day.

As required by the KZC 105.103.3.c, the applicant shall implement parking and TDM measures to reduce parking demand and incentivize residents to use other modes of transportation. As part of the SEPA determination for the project, the applicant agreed to a Transportation Management Plan to reduce the traffic impacts of the project (see Attachment 12).

Public Works is requiring that the applicant incorporate the following additional measures as part of the TMP. These measures will minimize parking impacts to the adjacent properties and ensure that there will be adequate mitigation measures to control spillover parking:

1. Allocate 24 parking spaces for the commercial use. These parking spaces may be shared by all users (residents or visitors to the residents) between 7 P.M. and 6 A.M. on weekdays and all day on weekends. These parking spaces may not be gated nor assigned to the apartment tenants. Signage will be required.
2. Allocate 40 parking spaces for visitors. These spaces may shall not be gated nor assigned to the apartment tenants or commercial tenants. Guest parking stalls located in a common area shall not be leased or assigned to residents. Guest parking stalls shall not be gated and shall be accessible to guests 24 hours per day. Signage will be required.

The proposed parking modification does not include a potential conversion of the building's southeast corner residential amenity space to commercial space that was presented to the Design Review Board. The 750 to 2,400 square foot space would require 3 to 8 additional parking spaces.

Staff assessed the parking impact of the amenity space with a shared parking analysis. Based on the shared parking analyses, there will be a deficit of two spaces between 7 P.M. to 8 P.M. during the weekday. Up to two thousand (2,000

sf) of the amenity space can be converted to commercial use (non-medical or fitness use) without parking overflow. Any future conversion of the residential amenity space to commercial space will require SEPA (Environmental) and building permit reviews.

VI. CONCLUSION

After reviewing the studies and letter prepared by the applicant's consultant and City Transportation Engineer's recommendation, Staff agrees that the data provided supports a reduction in the number of required parking stalls from 460 to 401 stalls for the proposed residential use. The parking modification request is approved with the conditions as outlined in Section I.

VII. APPEALS TO THE HEARING EXAMINER

Section 105.105 of the Zoning Code allows the Planning Official's decision to be appealed by the applicant or any person who submitted written comments or information to the Planning Official using the appeal provisions in KZC Sections 145.60 through 145.100. A party who signed a petition may not appeal unless such party also submitted independent written comments or information.

The appeal must contain a clear reference to the matter being appealed and a statement of the specific elements of the Planning Official's decision disputed by the person filing the appeal. The appeal must be in writing and must be delivered, along with any fees set by ordinance to the Planning and Building Department by 5:00 p.m., December 27, 2023, fourteen (14) calendar days following the postmarked date of distribution of the Planning Official's decision.

VIII. ATTACHMENTS

1. Vicinity Map
2. Parking Modification Request dated April 13, 2023 prepared by Heffron Transportation
3. Parking Modification Request dated June 15, 2023 prepared by Heffron Transportation
4. Parking Modification Letter dated August 4, 2023 prepared by Jessica Clawson of McCullough Hill
5. Parking Modification Request dated November 30, 2023 prepared by Heffron Transportation
6. Parking Modification Analysis Staff Review Memorandum prepared by Thang Nguyen, City Transportation Engineer dated December 1, 2023
7. Public Comment Letter
8. Public Comment Letter
9. Public Comment Letter
10. Applicant's Response Letter
11. Public Comment Letter
12. SEPA Determination TMP Elements

Cc: Transportation Engineer
Parties of Record

MODERA DESIGN REVIEW
DRV23-00164

NE 71ST ST

NE 70TH DR

RM 3.6

NE 70TH PL

Subject Property

68TH ST

RM 3.6

130TH AVE NE

BCX

Snyder
Corner
Park

NE 65TH ST

PR 3.6

RM 3.6

NE 66TH ST

VE NE





MEMORANDUM

Date: April 13, 2023

Project: Bridle Trails Residential (13033 NE 70th Place, Kirkland WA)
Project No. PRE22-00157

Subject: Parking Modification Request

Author: Marni C. Heffron, P.E., P.T.O.E. 

This report presents the parking modification request for the Bridle Trails Residential project located at 13033 NE 70th Street (Parcel 1241500285) in the City of Kirkland. The project proposes to provide 430 total parking spaces, 407 long term/resident parking, and 23 short-term parking spaces for the retail/office leasing space and residential guests. This memorandum supports the project's application to reduce its code-required parking from 468 required to 430 proposed, a reduction of 38 spaces. The following sections describe the project, code required parking, parking demand, and project attributes that justify this request.

1. Project Description

The project site is located just south of NE 70th Place and just east of 130th Avenue NE, and is currently occupied by the existing Tech City Bowl. Per the latest site plan,¹ the project proposes to construct 368 residential units plus about 7,000 square feet (sf) of commercial space. The project would remove the existing Tech City Bowl, a 32,500-sf bowling alley with 32 bowling lanes, as well as an existing two-story commercial building that has about 3,430 sf of general retail space. The northwest corner of the block, which is occupied by Pagliacci Pizza, is not part of the development site.

2. Code-Required Parking

The required number of parking spaces for various land uses is set forth in the Kirkland Zoning Code (KZC) 35.40 (Development Standards). The required parking spaces for "Attached or Stacked Dwelling Units" are as follows:

- 1.2 per studio unit.
- 1.3 per 1-bedroom unit.
- 1.6 per 2-bedroom unit.
- 1.8 per 3 or more-bedroom unit.

In addition, KZC 105.20 requires guest parking at a "*minimum of 10 percent of the total number of required parking spaces.*"

The City of Kirkland's parking requirements were updated in February 2021 to reduce the parking required for residential projects located near (within a quarter-mile of) high-frequency transit service

¹ Weber Thompson Architects, November 4, 2022.

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stops in compliance with Revised Code of Washington (RCW) 36.70A.620. The updated requirements, also set forth in KZC 105.20 and applicable to the Bridle Trails site, are listed below.

- 4.c. *For market rate multifamily dwelling units that are located within one-quarter mile of a transit stop that receives transit service from at least one (1) route that provides service at least four (4) times per hour for 12 or more hours per day, minimum parking requirements for one-bedroom and studio units are reduced to one (1) parking space per one-bedroom unit and 0.75 space per studio unit.*
- 4.d. *When utilizing parking space reductions for one-bedroom or studio units in subsections (4)(a)² and/or (c) of this section, those dwelling units shall provide additional guest parking consistent with the requirements in subsection (3) of this section. The Planning Official may reduce or eliminate the number of required on-site guest parking spaces for those units where a peak occupancy analysis of on-street parking along the subject property's street frontage, using methodology approved by the City's Transportation Engineer, shows availability of an equal or greater number of available on-street parking spaces.*

King County Metro Route 245 operates along the NE 70th Street Place - Old Redmond Road corridor with stops for both directions on each side of the 132nd Avenue NE intersections (westbound buses stop on the west side of the intersection and eastbound buses stop on Old Redmond Road on the east side of the intersection). This route, which connects the Kirkland Transit Center to Factoria, has 12 to 15-minute headways (four to five buses per hour per direction) from about 6:00 A.M. to 7:00 P.M. (more than 12 hours per day).³ In addition, Route 225, connecting the Kenmore Park-and-Ride to Overlake, operates along 132nd Avenue NE north of the site and along Old Redmond Road NE east of the site. The nearest stop for southbound-to-eastbound buses is the same as the eastbound stop served by Route 245 (on Old Redmond Road just east of 132nd Avenue NE); the nearest stop for westbound-to-northbound Route 225 buses is located on Old Redmond Road at NE 69th Street (less than a quarter mile from the site). This route adds two buses per hour per direction for more than 12 hours per day. Overall, there are 12 buses per hour operating in the site vicinity for more than 12 hours per day. This level of transit service is frequent enough that the site meets the criteria as a location for proximity to a high-frequency transit stop. However, the KZC's frequent transit service reduction only applies to studio and one-bedroom units.

Table 1 summarizes the code-required parking supply for the proposed project. The code-required parking for the project's residential component would be 445 spaces, which reflects a weighted average of 1.21 spaces per unit including the guest parking. The commercial use is required to provide 1 space for every 300 sf of space (KZC 35.40.160). Overall, the code-required parking would be 468 spaces with 404 long-term spaces plus 64 short-term spaces for guests and customers.

² KZC §105.20.4.a refers to very low and extremely low-income units. Although they could apply to future development, the recommendations herein are for market-rate units.

³ Based on King County Metro's schedules in effect from 03/28/2023 through 09/01/2023.
<https://kingcounty.gov/depts/transportation/metro/schedules-maps.aspx>, accessed April 12, 2023.

Table 1. Parking Supply Requirement

		Parking Supply per Existing KZC	
Unit Size	Number of Units	Spaces per Unit or SF	Spaces Required
Studio	64 dwelling units	0.75 spaces / unit	48
1-bedroom	202 dwelling units	1.00 spaces / unit	202
2-bedroom	83 dwelling units	1.60 spaces / unit	133
3-bedroom	19 dwelling units	1.80 spaces / unit	21
Total	368 dwelling units		404
Residential Guest Parking	Add 10% (spaces / unit)	0.11 spaces / unit	41
Total Residential	Weighted Rate (spaces / unit)	1.21 spaces / unit	445
Commercial Use	7,014 Square feet	1 space per 300 sf	23
Total All			468

Source: Heffron Transportation, Inc., April 2023. Unit count by type of unit from ARC Architects, April 2023.

3. Parking Demand Based on Local Data

Parking demand for the proposed project was estimated using two sources of local residential parking data. These are described below.

3.1. King County Right Size Parking Calculator

King County Metro has one of the nation's largest databases of residential parking demand. The County recognized that constructing too much parking supply can result in higher levels of automobile ownership, vehicle travel, congestion, and development costs. With a grant from the Federal Highway Administration, Metro compiled overnight parking occupancy information at more than 200 multi-family developments in King County over the winter and spring of 2012 and 75 more buildings in 2017. The data were then used to develop a statistical model to estimate parking demand based on several factors including site location, unit size, and availability of transit service. The project's residential parking demand was estimated using *King County Multi-Family Residential Parking Calculator*.⁴ Parameters related to project were entered into the model, which returned an average per-unit rate of 0.94 spaces per unit, or 347 spaces. Further analysis of King County's dataset for Kirkland and Redmond is provided in the next section.

3.2. Parking Rates for Projects in the Cities of Kirkland and Redmond

The City of Kirkland commissioned a study to review how well model output from the *King County Multi-Family Residential Parking Calculator* compared to actual experience for individual projects in Kirkland. This study, *Right Size Parking Web Calculator Estimates in Kirkland*,⁵ compared model estimates to the actual parking demand data for projects throughout Kirkland: seven sites in the downtown core area plus 17 sites outside of downtown. Those that are outside of downtown Kirkland were further evaluated herein since

⁴ King County Metro, <https://rightsizeparking.org/>, accessed October 2021. The model was built using regression analysis with a dependent variable of observed vehicles per occupied residential unit (parking/unit ratio) and nine independent variables: unit size, occupied bedrooms, average rent, parking price, parking spaces, percent affordable units, and gravity measures of employment, population, and transit. The resulting model, based on local data, has an R-squared correlation value of 0.85 (85% of the variation observed in parking use can be explained through the nine variables).

⁵ Fehr & Peers, June 18, 2014.

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they best reflect conditions in the Bridle Trails neighborhood. The data reflect 2012 parking demand counts for 10 sites that King County had included in its original RSPC dataset, as well as 2014 parking demand counts for seven additional projects. It is noted that many paradigm shifts related to transportation, including the prevalence of shared mobility options such as Uber and Lyft, car share programs, and bike facility enhancements, had not yet been established when these data were collected. The database included many metrics about each project surveyed including the number of parking spaces, whether those were reserved for residents, and availability of on-street or other off-street parking. Each of the sites was surveyed to determine peak residential demand during the overnight hours. The demand counts tallied all vehicles parked on the site and did not differentiate between residents and guests.

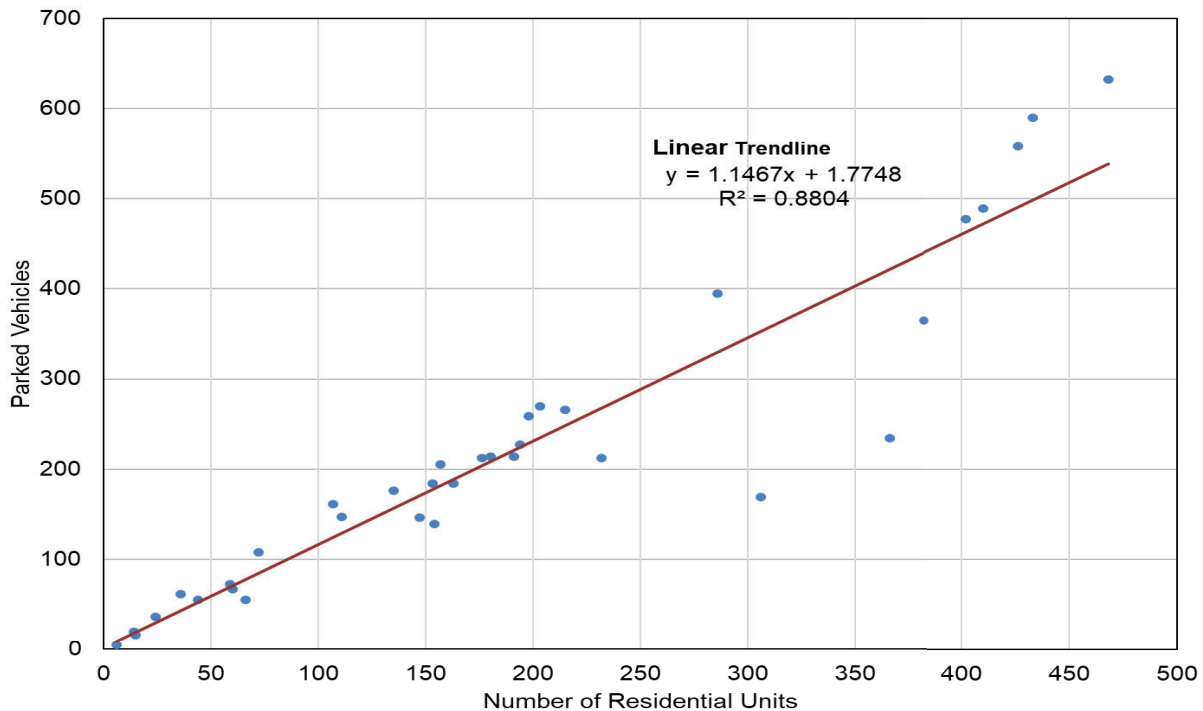
The Fehr & Peers study concluded that, *“Overall, the RSP web calculator [RSPC] is estimating parking utilization accurately for most of the selected sites in Kirkland, with 20 of the 24 sites within a 15 percent level of error. We do note, however, a slight tendency for the model to under-predict utilization.”* It also found that, *“in certain transit rich environments, the web calculator may be overestimating parking utilization.”*

One of the potential issues with the RSPC is how it deals with unit size (e.g., studio versus 2-bedroom units). The RSPC returns a per-unit rate that covers all unit sizes; the Kirkland code then applied multipliers to derive a parking rate for different size units by applying a multiplier to the base rate for a 1-bedroom unit. Further analysis of the local parking demand data was performed to derive a rate per bedroom. The analysis used the data set described above for 17 non-downtown Kirkland projects plus additional data provided by City of Kirkland staff for 19 residential projects in the City of Redmond, which had also been collected in 2012 and 2014. For both datasets, the number of units as well as the types of units were provided. This allowed the parking demand to be compared based on both the total number of units (which is the traditional way to assess parking demand) as well as on the number of bedrooms (which is similar to the City of Kirkland’s zoning code approach to estimating parking supply requirements). Of the 36 residential projects in the dataset, 2% were studios, 36% were one-bedroom units, 39% were two-bedroom units, and 13% were three-bedroom units. The average unit size was 1.6 bedrooms.

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Figure 1, which plots a linear regression of parking demand versus residential units, shows very good correlation with an R-squared value of 0.88.⁶ However, the correlation between parking demand and the number of bedrooms (the linear regression shown on Figure 2), is even higher with an R-squared value of 0.94. This shows that a rate “per bedroom” is a better predictor of parking supply than a rate “per unit.”

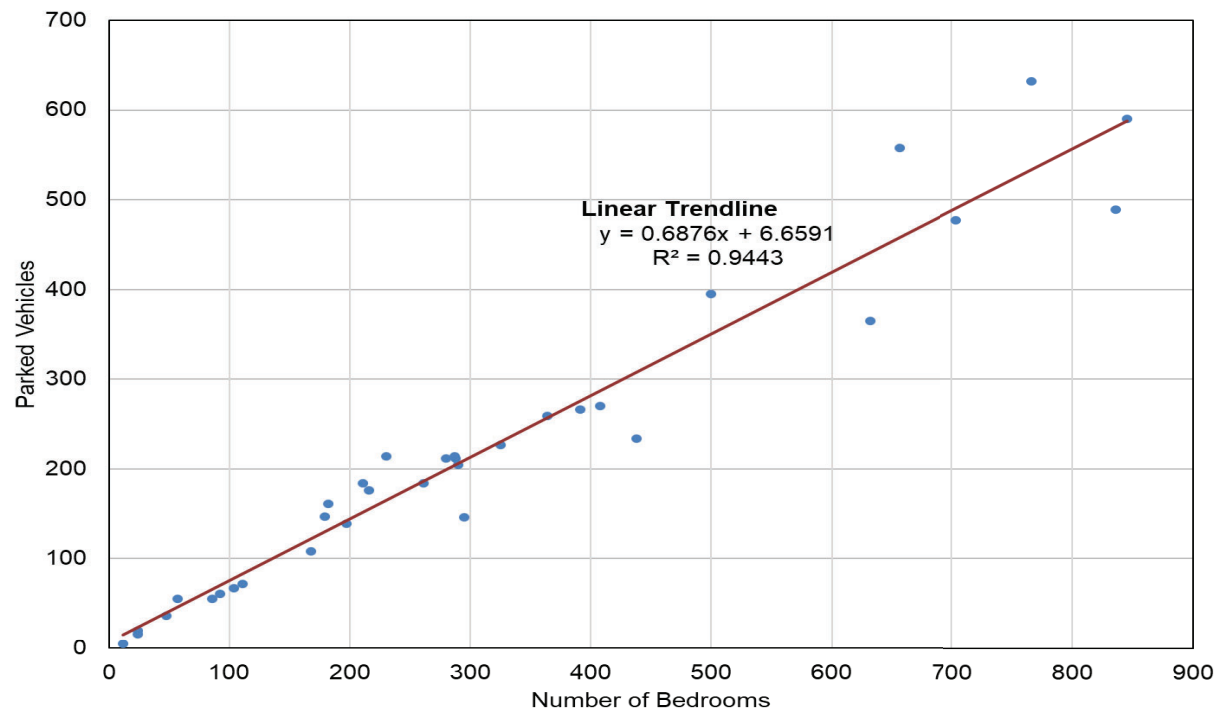
Figure 1. Parking Demand versus Residential Unit Count



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

⁶ R-squared is a statistical measure of how close the data are to the fitted regression line, specifically, how much variation of a dependent variable is explained by the independent variable(s) in a regression model. The higher the R-squared value, the better the model fits the data. An R-squared value of 1.0 would be a perfect fit.

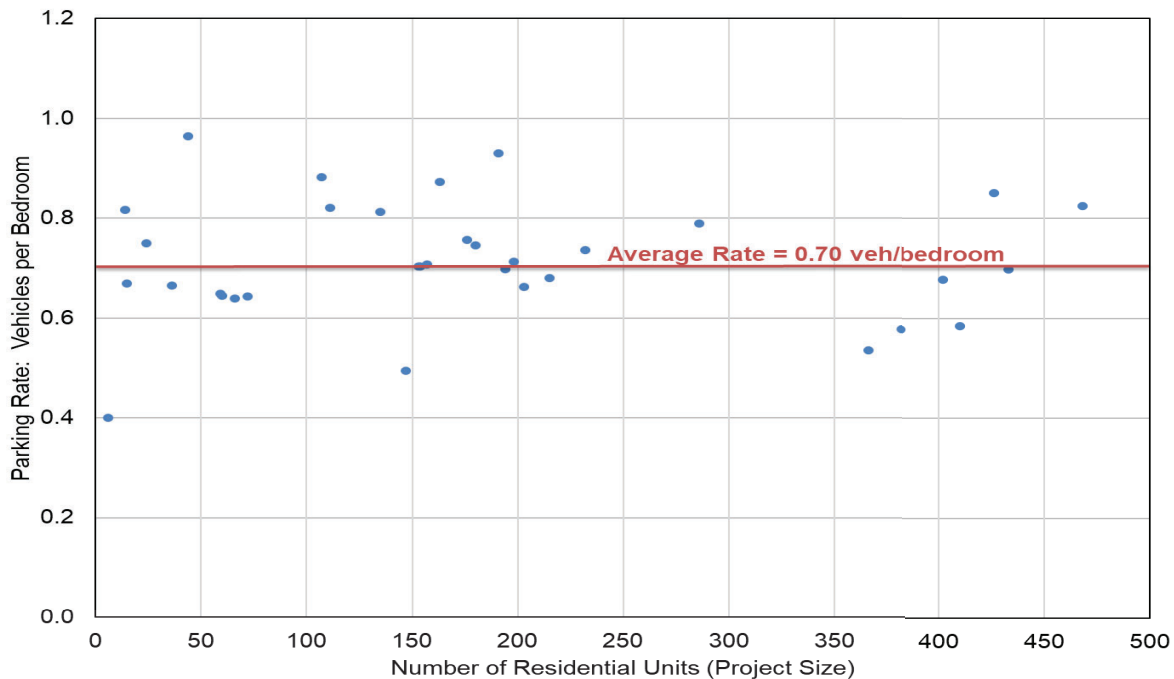
Figure 2. Parking Demand versus Number of Bedrooms



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

The average parking demand rate is 0.7 vehicles per bedroom as shown on Figure 3. This average rate is unrelated to the overall building size (in terms of total number of units). Most notable about these data is that not a single project had a parking rate above 1.0 vehicles per bedroom, which means that some residents in all of the projects likely live without a vehicle, are using one or more bedrooms for other purposes such as an in-home office, or are working an off-hours shift.

Figure 3. Parking Rate per Bedroom versus Project Size



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

The above information was used to estimate parking demand for the proposed residential project, which proposes 489 bedrooms in the 368 units. Using both the per-unit and per-bedroom demand rates derived from the local data, the residential uses are expected to have a peak parking demand between 342 vehicles and 424 vehicles. The *King County Multi-Family Residential Parking Calculator* described previously estimated the need at 347 spaces, which is within this range. The project proposes to provide 407 long-term parking spaces for residents, which is near the upper end of this range. It is noted that the local data on which the rates were based includes guest parking, so the long-term parking provided would be near the peak of the long-term need based on local data.

4. On-Street Parking

KZC 105.20.4.d allows use of on-street parking adjacent to a site to accommodate some of its guest parking need. The project would have about 250 linear feet of new curb area between its driveway and the emergency access road. This is estimated to accommodate between 13 and 14 parallel-parked vehicles. It is proposed that this parking be signed for either short-term parking (e.g., 2-hour time limit during day-time hours) or “No Overnight Parking.” Both of these restrictions would likely prevent long-term resident parking along this section, and retain the space for commercial and guest use.

5. Summary

The project proposes to provide 430 total parking spaces, 407 long term/resident parking, and 23 short-term parking spaces for the retail/office leasing space and residential guests. This is 38 fewer spaces than 468 spaces required by the City of Kirkland Zoning code. The reduced parking supply would accommodate the project's demand because:

- Local parking data determined that the project would require between 342 and 424 parking spaces for residents, inclusive of resident and guest needs. The project's 407 long-term spaces would be near the upper end of this range, and is sufficient for the resident parking.
- The 23 short-term parking spaces would meet the code requirement for the site's commercial use, which would have its peak demand during daytime hours. The spaces could be shared with guests, for which the peak demand is expected to occur in the evenings and on weekends.
- On-street parking along the site's 130th Avenue NE frontage could accommodate 12 to 14 vehicles. It is recommended that the on-street parking be signed to prevent long-term parking so that it can serve short-term guest parking needs.

Bridle Trails Project - Parking Modification Request - FINAL 04-13-2023

MEMORANDUM

Date: June 15, 2023

Project: Bridle Trails Residential (13033 NE 70th Place, Kirkland WA)
Project No. PRE22-00157

Subject: Parking Modification Request – REVISED

Author: Marni C. Heffron, P.E., P.T.O.E. 

This report presents the parking modification request for the Bridle Trails Residential project located at 13033 NE 70th Street (Parcel 1241500285) in the City of Kirkland. It has been revised from a prior version (dated April 13, 2023) to address City comments and provide additional supporting information.

Kirkland Zoning Code (KZC) §105.103.3.c states:

For a modification to KZC 105.20 and 105.45, a decrease in the required number of spaces may be granted if the number of spaces proposed is documented by an adequate and thorough parking demand and utilization study to be sufficient to fully serve the use. The study shall be prepared by a licensed transportation engineer or other qualified professional, and shall analyze the operational characteristics of the proposed use which justify a parking reduction. The scope of the study shall be proposed by the transportation engineer and approved by the City Transportation Engineer. The study shall provide at least two (2) days of data for morning, afternoon and evening hours, or as otherwise approved or required by the City Transportation Engineer. Approval of a parking reduction shall be solely at the discretion of the City. A decrease in the minimum required number of spaces may be based in whole or part on the provision of nationally accepted TDM (transportation demand management) measures. Data supporting the effectiveness of the TDM measures shall be provided as part of the parking demand and utilization study and approved by the City Transportation Engineer.

1. Project Description and Parking Modification Request

The project site is located just south of NE 70th Place and just east of 130th Avenue NE, and is currently occupied by the existing Tech City Bowl. Per the latest site plan,¹ the project proposes to construct 368 residential units plus about 7,000 square feet (sf) of commercial space. The project would remove the existing Tech City Bowl, a 32,500-sf bowling alley with 32 bowling lanes, as well as an existing two-story commercial building that has about 3,430 sf of general retail space. The northwest corner of the block, which is occupied by Pagliacci Pizza, is not part of the development site.

¹ Weber Thompson Architects, November 4, 2022.

2. Code-Required Parking

The required number of parking spaces for various land uses is set forth in the Kirkland Zoning Code (KZC) §35.40 (Development Standards). The required parking spaces for “Attached or Stacked Dwelling Units” are as follows:

- 1.2 per studio unit.
- 1.3 per 1-bedroom unit.
- 1.6 per 2-bedroom unit.
- 1.8 per 3 or more-bedroom unit.

In addition, KZC §105.20 requires guest parking at a “*minimum of 10 percent of the total number of required parking spaces.*”

The City of Kirkland’s parking requirements were updated in February 2021 to reduce the parking required for residential projects located near (within a quarter-mile of) high-frequency transit service stops in compliance with Revised Code of Washington (RCW) §36.70A.620. The updated requirements, also set forth in KZC §105.20 and applicable to the Bridle Trails site, are listed below.

- 4.c. *For market rate multifamily dwelling units that are located within one-quarter mile of a transit stop that receives transit service from at least one (1) route that provides service at least four (4) times per hour for 12 or more hours per day, minimum parking requirements for one-bedroom and studio units are reduced to one (1) parking space per one-bedroom unit and 0.75 space per studio unit.*
- 4.d. *When utilizing parking space reductions for one-bedroom or studio units in subsections (4)(a)² and/or (c) of this section, those dwelling units shall provide additional guest parking consistent with the requirements in subsection (3) of this section. The Planning Official may reduce or eliminate the number of required on-site guest parking spaces for those units where a peak occupancy analysis of on-street parking along the subject property’s street frontage, using methodology approved by the City’s Transportation Engineer, shows availability of an equal or greater number of available on-street parking spaces.*

King County Metro Route 245 operates along the NE 70th Street Place - Old Redmond Road corridor with stops for both directions on each side of the 132nd Avenue NE intersections (westbound buses stop on the west side of the intersection and eastbound buses stop on Old Redmond Road on the east side of the intersection). This route, which connects the Kirkland Transit Center to Factoria, has 12 to 15-minute headways (four to five buses per hour per direction) from about 6:00 A.M. to 7:00 P.M. (more than 12 hours per day).³ In addition, Route 225, connecting the Kenmore Park-and-Ride to Overlake, operates along 132nd Avenue NE north of the site and along Old Redmond Road NE east of the site. The nearest stop for southbound-to-eastbound buses is the same as the eastbound stop served by Route 245 (on Old Redmond Road just east of 132nd Avenue NE); the nearest stop for westbound-to-northbound Route 225 buses is located on Old Redmond Road at NE 69th Street (less than a quarter mile from the site). This route adds two buses per hour per direction for more than 12 hours per day. Overall, there are 12 buses per hour operating in the site vicinity for more than 12 hours per day. This level of transit service is frequent enough that the site meets the criteria as a location for proximity to a high-frequency transit stop. However, the KZC’s frequent transit service reduction only applies to studio and one-bedroom units.

² KZC §105.20.4.a refers to very low and extremely low-income units. Although they could apply to future development, the recommendations herein are for market-rate units.

³ Based on King County Metro’s schedules in effect from 03/28/2023 through 09/01/2023.
<https://kingcounty.gov/depts/transportation/metro/schedules-maps.aspx>, accessed April 12, 2023.

Bridle Trails Residential
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Table 1 summarizes the code-required parking supply for the proposed project. The code-required parking for the project's residential component would be 459 spaces, which reflects a weighted average of 1.25 spaces per unit including the guest parking. The commercial use is required to provide 1 space for every 300 square feet (sf) of space (KZC §35.40.160) or 24 spaces. Overall, the code-required parking would be 483 spaces.

The project proposes to provide 425 total parking spaces, 401 parking spaces for residents/guests and 24 parking spaces for commercial uses. This reflects a reduction of 58 residential parking spaces compared to KZC requirements. No reduction in the commercial parking requirement is proposed.

Table 1. Parking Supply Requirement versus Proposed Supply

Kirkland Zoning Code Requirement			
Unit Size	Number of Units (% of All Units)	Parking Required per Existing KZC	Spaces Required
Studio	64 dwelling units (7%)	0.75 spaces / unit	48
1-bedroom	202 dwelling units (55%)	1.00 spaces / unit	202
2-bedroom	83 dwelling units (23%)	1.60 spaces / unit	133
3-bedroom	19 dwelling units (5%)	1.80 spaces / unit	34
Total	368 dwelling units		417
Residential Guest Parking	Add 10% (spaces / unit)	0.11 spaces / unit	42
Total Residential	Weighted Rate (spaces / unit)	1.25 spaces / unit	459
Commercial Use	6,978 square feet	1 space per 300 sf	24
Total Required by Code			483
Proposed Supply		Stalls Proposed	Parking Deficit Compared to Code
Residential / Guest Stalls		401	-58
Commercial Parking		24	-0
Total		425	-58

Source: Heffron Transportation, Inc., June 2023. Program information from Weber Thompson Architects, June 2023.

3. Local Parking Data that Supports Parking Supply Modification

Many different local data sources were compiled and evaluated to estimate the parking demand associated with the proposed Bridle Trails project. These data show that the KZC requirements would oversupply parking at the subject project. The data sources include the following.

- **King County Multi-Family Residential Parking Calculator (KCRPC)** – King County has created a database and model tool to estimate parking demand based on many location-specific metrics rather than just project size. It is one of the largest databases of residential parking data in the U.S., and reflects local King County conditions.
- **City of Kirkland and Redmond Parking Data** – The City of Kirkland commissioned an independent review of the KCRPC, to determine how well the model related to Kirkland projects. As part of this effort, the City collected additional parking demand data for many projects in the Cities of Kirkland and Redmond. These are further evaluated to show the correlation to per-unit and per-bedroom parking rates.
- **Parking data for new projects in Spring District and Overlake Neighborhoods** – Additional data were collected for relatively new residential projects located in Bellevue’s Spring District that are in the same tenant market as the proposed Bridle Trails project.
- **Parking data from other consultants** – Data from four multi-family residential projects collected by another consultant were also reviewed and considered.

Parking demand for the proposed project was estimated using two sources of local residential parking data. These are described below.

3.1. King County Multi-Family Residential Parking Calculator

The *King County Multi-Family Residential Parking Calculator (KCRPC)*,⁴ was originally created by King County Metro in 2012 as part of a study that examined the relationship among several variables to help better plan parking supply throughout the County. The County recognized that constructing too much parking supply can result in higher levels of automobile ownership, vehicle travel, congestion, and development costs. With a grant from the Federal Highway Administration, Metro compiled information about multi-family residential parking use at more than 200 developments in King County over the winter and spring of 2012. Parking occupancy was recorded on Tuesdays, Wednesdays, and Thursdays between midnight and 5:00 A.M. in each multi-family development studied. Metro then developed a statistical model to estimate parking use based on building and environmental characteristics. King County updated the calculator in 2018 using new data collected at 75 additional sites throughout the county in 2017. The *RSPC* is one of the largest databases of residential parking demand in the country, and reflects local travel characteristics in King County. Overall, Metro collected data for 275 multi-family sites. For comparison, the Institute of Transportation Engineers’ national database for Multifamily Mid-Rise Housing in its *Parking Generation Manual* is based on no more than 73 study sites.⁵

The *Parking Calculator* predicts the parking demand for a multi-family residential project based on seven independent variables, each one of which demonstrated strong statistical correlation related to parking demand.⁶

- Gravity measure of Transit Frequency – a factor that accounts for both the quantity and proximity of transit service;
- Percent of units designated affordable;

⁴ King County Metro, <https://rightsizeparking.org/>, accessed April 2023.

⁵ ITE, *Parking Generation Manual*, 5th Edition, 2019.

⁶ King County Metro, *Right Size Parking Final Report*, August 15, 2015. <https://metro.kingcounty.gov/programs-projects/right-size-parking/pdf/rsp-final-report-8-2015.pdf>

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- Average number of bedrooms in all units;
- Gravity measure of population and jobs;
- Size of unit;
- Average rent; and
- Parking price as a fraction of average rent.

When all seven of the factors listed below are considered, King County found a very strong correlation between the modelled results and actual observed demand.⁷

The site location and anticipated residential characteristics were entered into the King County RSPC. It returned an average per-unit rate of 0.94 spaces per unit, or 346 spaces. Further analysis of King County’s dataset for Kirkland and Redmond is provided in the next section.

3.2. Parking Rates for Projects in the Cities of Kirkland and Redmond

The City of Kirkland commissioned a study to review how well model output from the *King County Multi-Family Residential Parking Calculator* compared to actual experience for individual projects in Kirkland. This study, *Right Size Parking Web Calculator Estimates in Kirkland*,⁸ compared model estimates to the actual parking demand data for projects throughout Kirkland: seven sites in the downtown core area plus 17 sites outside of downtown. Those that are outside of downtown Kirkland were further evaluated herein since they best reflect conditions in the Bridle Trails neighborhood. The data reflect 2012 parking demand counts for 10 sites that King County had included in its original RSPC dataset, as well as 2014 parking demand counts for seven additional projects. It is noted that many paradigm shifts related to transportation, including the prevalence of shared mobility options such as Uber and Lyft, car share programs, and bike facility enhancements, had not yet been established when these data were collected. The database included many metrics about each project surveyed including the number of parking spaces, whether those were reserved for residents, and availability of on-street or other off-street parking. Each of the sites was surveyed to determine peak residential demand during the overnight hours. The demand counts tallied all vehicles parked on the site and did not differentiate between residents and guests.

The Fehr & Peers study concluded that, “Overall, the RSP web calculator [RSPC] is estimating parking utilization accurately for most of the selected sites in Kirkland, with 20 of the 24 sites within a 15 percent level of error. We do note, however, a slight tendency for the model to under-predict utilization.” It also found that, “in certain transit rich environments, the web calculator may be overestimating parking utilization.”

Most parking demand data—including parking data in the Institute of Transportation Engineers (ITE) *Parking Generation Manual*⁹ and the KCRPC described above—report parking demand as “vehicles per unit.” These rates do not account for different mixes of (e.g., studio versus 2-bedroom units). To overcome this limitation, some recent studies have derived a “per bedroom” parking demand rate that can then be applied to estimate parking need based on the planned unit mix. This is essentially the approach used by the KZC requirements that list different rates by unit size; however, there is no background about how the KZC rates were derived.

Therefore, further analysis to derive a rate per bedroom was performed using the dataset described above for 17 non-downtown Kirkland projects plus additional data provided by City of Kirkland staff for 19 residential projects in the City of Redmond. For both datasets, the number of units as well as the types of units were provided. This allowed the parking demand to be compared based on both the total number of units (which is the traditional way to assess parking demand) as well as on the number of bedrooms

⁷ R-squared values of 0.81.

⁸ Fehr & Peers, June 18, 2014.

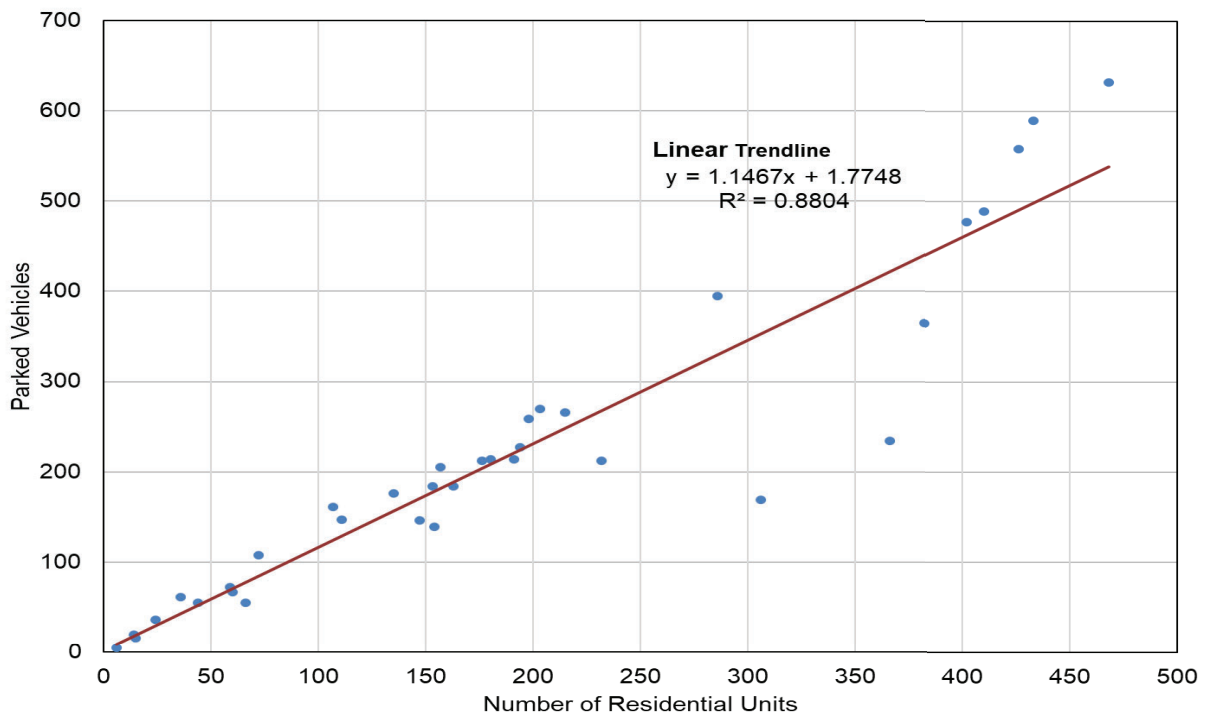
⁹ ITE, *Parking Generation Manual*, 5th Edition, 2019.

Bridle Trails Residential Parking Modification Request – REVISED

(which is similar to the City of Kirkland’s zoning code approach to estimating parking supply requirements). Of the 36 residential projects in the dataset, 2% were studios, 36% were one-bedroom units, 39% were two-bedroom units, and 13% were three-bedroom units. The average unit size was 1.6 bedrooms.

Figure 1, which plots a linear regression of parking demand versus residential units, shows very good correlation with an R-squared value of 0.88.¹⁰ However, the correlation between parking demand and the number of bedrooms (the linear regression shown on Figure 2), is even higher with an R-squared value of 0.94. This shows that a rate “per bedroom” is a better predictor of parking supply than a rate “per unit.”

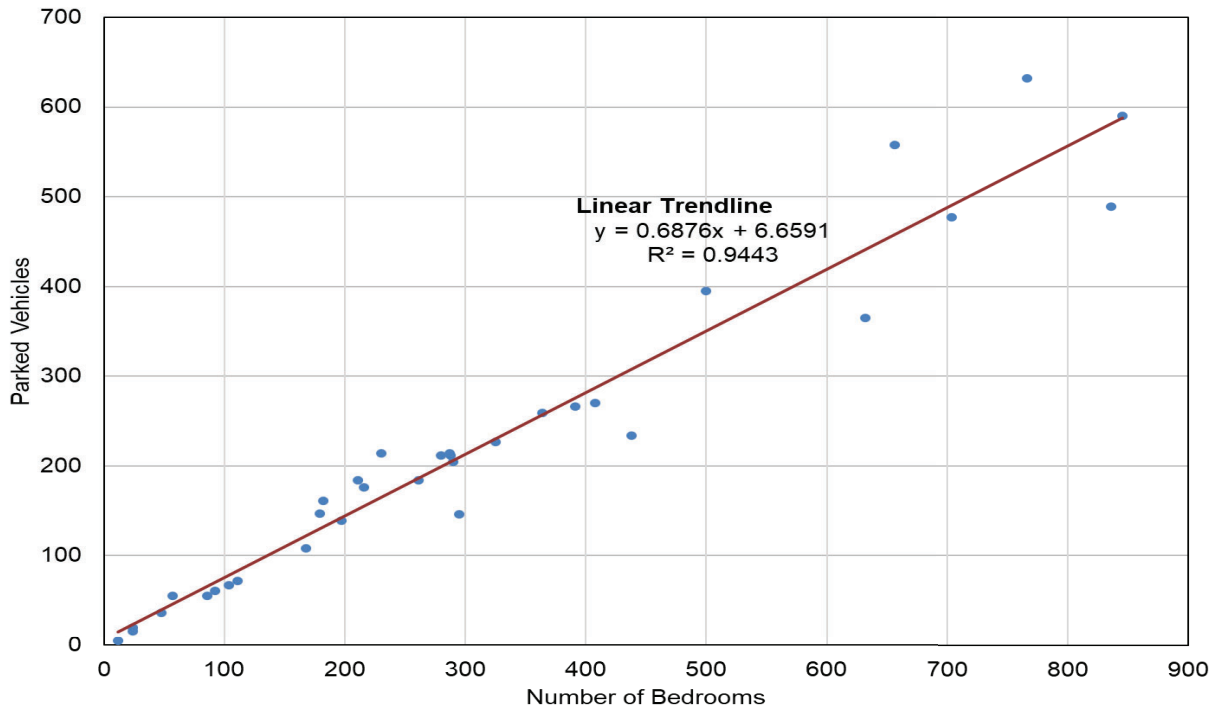
Figure 1. Parking Demand versus Residential Unit Count



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

¹⁰ R-squared is a statistical measure of how close the data are to the fitted regression line, specifically, how much variation of a dependent variable is explained by the independent variable(s) in a regression model. The higher the R-squared value, the better the model fits the data. An R-squared value of 1.0 would be a perfect fit.

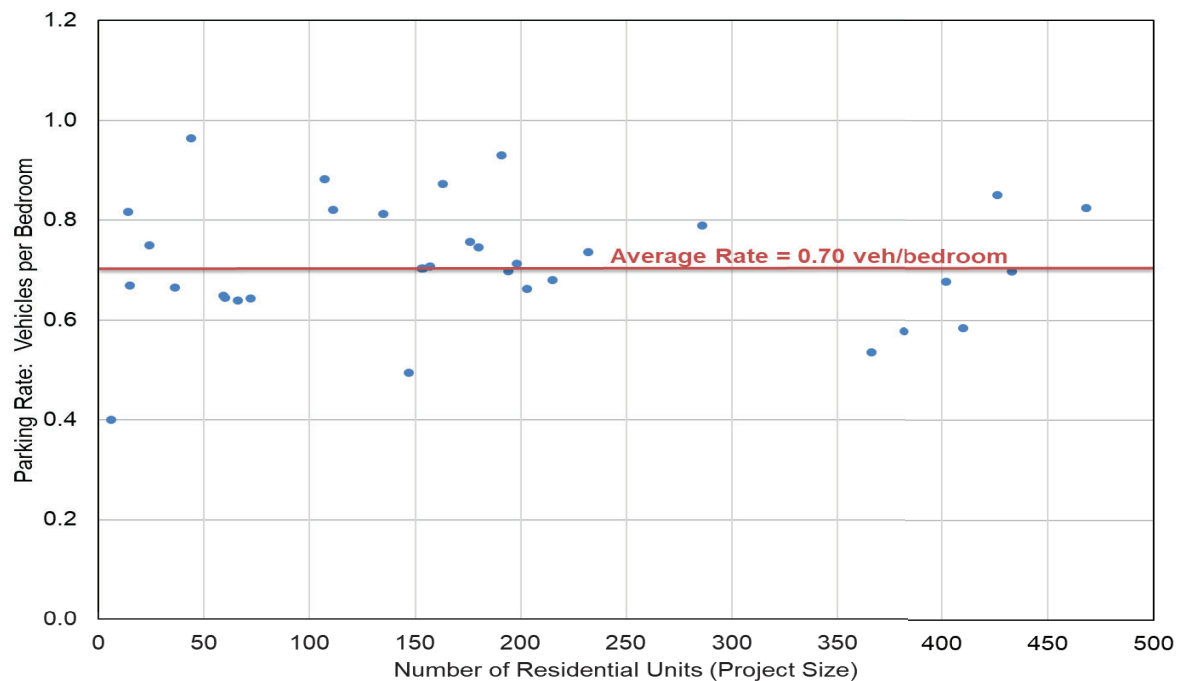
Figure 2. Parking Demand versus Number of Bedrooms



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

The average parking demand rate is 0.7 vehicles per bedroom as shown on Figure 3. This average rate is unrelated to the overall building size (in terms of total number of units). Most notable about these data is that not a single project had a parking rate above 1.0 vehicles per bedroom, which means that some residents in all of the projects likely live without a vehicle, are using one or more bedrooms for other purposes such as an in-home office, or are working an off-hours shift.

Figure 3. Parking Rate per Bedroom versus Project Size



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

The above information was used to estimate parking demand for the proposed residential project, which proposes 489 bedrooms in the 368 units. Using both the per-unit and per-bedroom demand rates derived from the local data, the residential uses are expected to have a peak parking demand between 342 vehicles and 424 vehicles.

3.3. Parking Data for Newer Residential Projects

New data were collected for six residential projects built within the past five years in the Spring District and Overlake neighborhoods. Project metrics (e.g., unit count by bedroom mix and number of parking spaces) were compiled from residential leasing databases; information related to project occupancy and parking demand were compiled from telephone interviews of building managers. Table 2 summarizes the project data and imputed parking rates, which reflect the parking demand if 100% of the residential units in each project were occupied. These projects had an average parking demand of 0.88 vehicles per unit or 0.66 vehicles per bedroom.

Compared to the Kirkland and Redmond dataset, these newer developments have higher proportions of small units with 16% studios and 53% one-bedroom units, and fewer large units (30% two-bedroom and 1% three-bedroom). The overall parking rate per unit was lower than derived for the local Kirkland and Redmond data (0.88 compared to about 1.15 vehicles per unit), but had a very similar per bedroom rate (0.66 compared to 0.70 per bedroom). This analysis shows that the per-bedroom rate can be reliably applied to projects that have a different mix of uses than those in the underlying dataset.

**Bridle Trails Residential
Parking Modification Request – REVISED**

Table 2. Parking Demand Rates for Projects in Spring District and Overlake Neighborhoods (2021)

Project Name	Address	Number of Units	Number of Bedrooms	# of Parking Spaces	Unit Occupancy Rate	Parking Occupancy Rate	Imputed Demand	
							(Assumes 100% Unit Occupancy) (Veh/Unit)	(Veh/Bedroom)
Sparc	1201 – 121 st Avenue NE	310	409	255	96%	100%	0.86	0.65
Hyde Square Apartments	2038 – 155 th Place NE	617	785	639	96%	72%	0.78	0.61
AMLI Spring District	1375 – 121 st Ave NE	204	299	265	97%	90%	1.20	0.82
Arras Apartments	12282 NE 12 th Lane	279	396	242	96%	100%	0.90	0.64
Bell Overlake	3040 – 148 th Ave NE	243	284	393	100%	45%	0.73	0.62
Modera Redmond	8709 – 161 st Ave NE	300	369	295	90%	72%	0.79	0.64
Average		326	424	348			0.88	0.66

Source: Weber Thompson, Mill Creek Residential, November, 2021.

3.4. Parking Data from Other Consultant Studies

Data for four multi-family residential projects in Bothell were presented in the *Totem Lake Apartments Parking Supply Reduction Request*.¹¹ Although the Totem Lake Apartments are subject to different KZC requirements, the data collected for its reduction request are relevant. The four projects in Bothell had a calculated parking demand rate of 1.05 vehicles per unit.

4. Summary of Residential Parking Demand for Bridle Trails

The parking rates derived from the various sources listed above were applied to the Bridle Trails project's residential component. Table 3 summarizes all of the findings and resulting parking demand. The study's results are relatively similar, ranging from 323 vehicles to 386 vehicles. It is noted that these demand values include resident plus guest parking. In comparison, the KZC would require 459 parking spaces—73 stalls more than even the highest estimate based on available data. Therefore, the request to reduce the KZC parking supply requirement by 58 parking spaces would not create adverse parking impacts.

Table 3. Parking Demand Estimates for Bridle Trails

Parking Study Dataset	Number of Sites Surveyed	Parking Demand Rate	Applicable Bridle Trails Metric	Parking Demand
King County Right Size Parking	275	0.94 per unit	368 units	346 vehicles
Kirkland & Redmond Sites	36	0.70 per bedroom	489 bedrooms	342 vehicles
Spring District & Overlake Sites	6	0.66 per bedroom	489 bedrooms	323 vehicles
Bothell Sites	4	1.05 per unit	368 units	386 vehicles

Sources: see full descriptions of sources earlier in this memorandum.

5. Parking and Transportation Demand Management

The Bridle Trails project would implement several Parking and Transportation Demand Management measures to reduce parking demand. These measures include:

- Charging residents for parking;
- Unbundling the cost of parking from apartment rent;
- Providing information to prospective tenants about the site's parking policies and near-site transportation alternatives; and
- Signing commercial stalls for commercial tenants only during hours that those businesses are open to the public.

¹¹ Transpo Group, June 16, 2021.

6. Summary

The project proposes to provide 425 total parking spaces, 401 long term/resident parking, and 24 short-term parking spaces for the retail/office leasing space and residential guests. This is 58 fewer spaces than the 483 spaces required by the City of Kirkland Zoning code.

Analyses of extensive data from four different datasets concluded that the residential plus guest parking demand could range from 323 vehicles to 386 vehicles. In comparison, the KZC would require 459 resident/guest parking spaces—73 stalls more than even the highest estimate based on available data. Therefore, the request to reduce the KZC parking supply requirement by 58 parking spaces would not create adverse parking impacts. No reductions to the commercial parking requirement are requested.

The project would implement parking and transportation demand management programs to reduce parking demand and potential parking overspill. These were listed previously in Section 5.

MCH/tsm

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McCULLOUGH HILL, PLLC

August 4, 2023

Thang T. Nguyen
Kirkland Public Works Department
123 5th Avenue
Kirkland, WA 98033
Via Email: tnguyen@kirklandwa.gov

Re: Parking Modification Request Response
Modera Bridle Trails project

Dear Thang:

Thank you for comments regarding the Parking Modification Request for the Modera Bridle Trails project. This is the first multifamily project in this zone and we wanted to provide some context and history behind the difference between the parking modification that is allowed in Bridle Trails versus the parking modification that is allowed in the rest of the City. The Planning Commission and the City Council intended for a more effective parking modification in Bridle Trails.

As part of the code development process, the Kirkland Planning Commission recognized the cost that parking adds to housing projects, increasing rents and reducing affordable housing. The Planning Commission recognized that while Kirkland allows parking modifications to be granted, each parking modification must increase its parking demand by a factor of 15%, which often nullifies the modification request. Staff and the Planning Commission recommended, in order to reduce the costs to build housing, to do away with the 15% increase factor for parking modifications. The City Council passed this provision and it is in place today (see Chapter 35.40, DS-2). The following are snips from the Planning Commission packets discussing the parking modification:

D. Development Standards Table for the BCX Zone (KZC 35.40)

1. Parking

Policy BT-Z: The policy states that with redevelopment of up to five stories, parking and transportation impacts should be minimized to create a pedestrian-oriented neighborhood center.

Analysis: The goal of the proposed regulations is to "right-size" the parking requirements. That means that development will provide for its parking demand onsite but will not be required to provide more parking than the demand. The reason staff, the Planning Commission, and the applicant are interested in right-sizing the parking for development of the neighborhood center include affordability, sustainability, supporting neighborhood serving eating and drinking, and to ensure equitable treatment in permitting of businesses interested in locating within the neighborhood center.

Proposed Regulations: The regulations include a provision that an applicant for a multifamily parking reduction through a parking modification, subject to the provisions KZC 105.103.3.c., is not required to include a 15% increase above their demonstrated parking demand rate (see Development Standard Special Regulation 2).

The regulations also include using the retail parking rate of 1 stall per 300 square feet of gross floor area for restaurants or tavern uses. This rate is similar to conventional parking rates for shopping centers. See Development Standard Special Regulation 15 for draft code amendment.

The draft regulations include requirements for future development contain affordable housing, which expands the opportunity to live in a neighborhood with access to shops, services, and transit for residents who would otherwise not be able to afford housing in this area. In addition, the development regulations include:

- “Right sized” parking requirements that further reduces the cost of living for residents with fewer or no cars
- Pedestrian-oriented site design offering open space and pathways within development that encourage social connectivity and gathering spaces
- Green building standards that offer health and wellbeing benefits to residents due to design and materials in construction of the building as well as lower utility rates due to more energy efficient construction

Proposed Parking Reductions

Staff Analysis: Policy BT-7 states that with redevelopment of up to five stories parking and transportation impacts should be minimized to create a pedestrian-oriented neighborhood center.

The applicant is proposing to reduce the residential parking rate. This reduction is supported by a parking analysis provided by the applicant’s transportation engineer (see Attachment 2). The study compares contemporary parking rates with parking requirements within Kirkland and with modeling derived from the King County Right Size Parking Calculator and the Right Size Parking Study commission by Kirkland in 2014. Staff and the applicant provided contemporary parking data for multifamily development within Kirkland, Redmond, and Bellevue for this study.

The Planning Commission acknowledged the potential impacts of providing excessive parking on housing affordability and the environment at their December 23, 2021 study session. While evaluating parking requirements is a potential new project on the 2022-2024 Planning Work Program it is far off and would involve significant staff and consulting time.

Since the applicant represents one parcel within the neighborhood center and is only requesting a parking reduction for multifamily use, a parking reduction request could be handled at the project level with a parking modification. KZC 105.103.3.c allows for a parking modification to decrease the required number of spaces for multifamily development with a parking demand and utilization study. However, this section requires parking modifications in zones outside of the Totem Lake Urban Center to add a 15 percent parking demand rate to the study’s projected parking need. In most cases this buffer nullifies the parking reduction.

Staff Recommendation: Adopt a special regulation for multifamily uses allowing for a parking reduction through a parking modification subject to the provisions KZC 105.103.3.c. without a requiring a 15 percent parking demand rate.

Clearly, Staff, the Planning Commission, and the City Council intended to allow the BCX zone in this area to utilize a more effective parking modification, to “right-size” parking.

Furthermore, there appears to be some confusion as to what parking requirements are the starting point for the parking modification for studio and one-bedroom units. In February 2021, the City Council adopted new baseline parking requirements for projects within a distance of frequent transit (0.75 stalls for studio units,

and 1 stall for one-bedroom units). These are the new baseline parking requirements in Kirkland and are separate from any parking modification. The code does not include any language that would prohibit a parking modification from being granted from these baseline parking requirements, and as such, we have sought a modification from the code-mandated parking requirements. There is no other baseline to use; it is an error to state that the parking modification has already been “granted” through the new baseline parking requirements.

Finally, we believe the utilization of the broadest data set in the state of Washington regarding parking (King County Right-Sized Parking), which is accepted in every other Eastside jurisdiction as a valid dataset for parking data is appropriate. We also received from the City of Kirkland other large data sets of parking information derived from projects on the Eastside as “backup” data that is Eastside-specific. It is unclear why we would not use the data sets that were provided to us by the City of Kirkland, in addition to other data sets, to obtain the clearest picture on parking demand data for the region. We are confident that the parking modification shows that there is ample parking to supply demand for the uses on-site, and in our experience the project is over-parked given its urban location in close proximity to services and transit.

Please do not hesitate to contact us should you have any questions regarding this issue.

Thank you,

A handwritten signature in black ink, appearing to read 'Jessie Clawson'.

Jessie Clawson

MEMORANDUM

Date: June 15, 2023

Project: Bridle Trails Residential (13033 NE 70th Place, Kirkland WA)
Project No. PRE22-00157

Subject: Response to City of Kirkland Parking Modification Comments

Author: Marni C. Heffron, P.E., P.T.O.E. 

This memorandum responds to the comments received from Thang Nguyen, Transportation Engineer for the City of Kirkland related to the *Bridle Trails Parking Modification Request* (April 13, 2023). The comments were imbedded into a PDF copy of the request memorandum. A *Revised Parking Modification Request* (June 15, 2023) has been prepared to address the comments. The City's comments are presented below along with responses about how the memorandum was changed.

Comment 1. *The code-required parking calculation should be updated, and show that the parking deficit is 53 vehicles.*

Response: Table 1 has been updated to correctly reflect the parking requirement for the 3-bedroom units. In addition, the calculation reflects the current size of retail space (6,978 sf) as well as the current proposed parking supply (425 spaces). The resulting deficit is 58 vehicles.

Comment 2. *These [the KZC parking requirements for studio and one-bedroom units] are already reduced rates [since they apply transit reduction], so the modification to reduce parking is only applicable to the 2 and 3-bedroom units and commercial.*

Response: KZC 105.20 states that, “a decrease in the required number of spaces may be granted if the number of spaces proposed is documented by an adequate and thorough parking demand and utilization study to be sufficient to fully serve the use. The study shall be prepared by a licensed transportation engineer or other qualified professional, and shall analyze the operational characteristics of the proposed use which justify a parking reduction.” It does not state or imply that the reductions are limited by type of unit or use.

The supporting data provided in the *Parking Modification Request* reflect parking demand data associated with 46 different residential projects in Kirkland, Redmond, and Bothell, and reflected those project's peak parking demand (typically collected in late evening or overnight). These data were used to predict that the parking demand for the Bridle Trails project would be accommodated by its proposed supply.

It is noted that the same results would be achieved by reducing just the parking rate applied to the 2-bedroom units and eliminating the need to provide separate guest parking.

Comment 3. *Remove this [King County Right Size Parking Calculator] discussion, we don't allow use of the KC parking calculator.*

Bridle Trails Residential
Response to City of Kirkland Parking Modification Comments

Response: Information from the King County Right Size Calculator was provided as evidence that the KZC rates are conservatively high based on the seven location-specific metrics that the calculator applies. The information from the calculator was not directly used, but is important to provide context for analysis of Kirkland and Redmond data described in the section of the report that follows, data that we believe to be very relevant to and appropriate for the *Parking Modification Request*. The text in this section was retained for context.

Comment 4. *Remove this section [detailed analysis of parking rates for Cities of Kirkland and Redmond]. The code parking rates were based from the City of Kirkland study, you can't use the study to argue for a reduction. Other data must be used to support your parking reduction request.*

Response: The referenced section provides analysis of data that Thang Nguyen provided to Heffron Transportation specifically for use in this parking modification request. The data transmittal followed a meeting with City staff (December 21, 2021) that acknowledged that the guest parking requirement adds a “buffer” to the residential parking that exceeded the City’s own analysis findings. We contend that use of these data is very appropriate, since it can be used to show that the adopted parking rates (that are the subject of this modification request) would result in too much parking being supplied for the Bridle Trails project.

The raw parking demand data provided for the City’s of Kirkland and Redmond allowed more in-depth regression analysis than the City study performed by Fehr & Peers.¹ This analysis, presented in the *Parking Modification Request*, shows parking demand by residential unit as well as parking demand by bedroom. The latter analysis provides the only way to dissect the parking demand associated with larger 2- or 3-bedroom units from smaller units since they always exist in a mixed-unit-size building.

Because this very robust dataset (36 studies of proximate multi-family projects) supports the parking modification requested, they are retained in the memorandum. Text has been added to describe the context.

Comment 5. *Parking data collected in Bothell for another project in Kirkland shows a parking rate per bedroom is 0.77, using that rate and applying to the Bridle Trails, the project is short 59 stalls.*

Response: Data presented in the *Parking Modification Request* reflected regression analysis for 36 projects in Kirkland and Redmond that showed the average per bedroom rate of 0.7 stalls per bedroom. We disagree that a rate derived from one project in Bothell should be applied instead of that more robust dataset.

We have augmented the analysis in the *Parking Modification Request* to include data from other sources including data from other consultants as well as new data collected for relatively new buildings in Bellevue’s Spring District and Overlake neighborhood. We have also added information from a study that Transpo Group performed of four Bothell project. Together, all of the data presented shows that the current KZC would result in oversupplied parking on the subject site.

Comment 6. *Based on this alone [the mix of unit types], the project’s unit mix is not comparable to site in the RSPC study.*

¹ Right Size Parking Web Calculator Estimates in Kirkland, Fehr & Peers, June 18, 2014.

Bridle Trails Residential
Response to City of Kirkland Parking Modification Comments

Response: The additional analysis to derive a per-bedroom parking rate was performed for the reason cited. A per-bedroom rate eliminates the need to have a mix of units that matches the dataset. The regression analysis shows that a per-bedroom rate has a higher correlation than a per-unit rate, primarily because not all projects have the same mix of sizes. Data from an additional six projects in the Spring District and Overlake neighborhood also show that the per-bedroom rate is appropriate and eliminates variation in parking demand estimates that can occur when the mix of unit sizes differs from the underlying dataset.

Comment 7. *This [ability to use on-street parking] is subject to providing an on-street parking utilization study to demonstrate availability, and it only applies to guest parking for the studio and 1-bedroom units.*

Response: The *Parking Modification Request* described using the 13 or 14 on-street parking spaces that would be newly created by the project along 130th Avenue NE. Since they do not currently exist, current utilization of these spaces is zero. However, because the preponderance of residential parking demand data shows that the project would not have parking overspill, we have eliminated the discussion of on-street parking except the potential to add restrictions for these new spaces to prevent long-term use.

Comment 8. *Weekday parking accumulation shows there is a deficit between 10 AM and 11 PM.*

Response: The analysis of extensive data from four different datasets concluded that the residential-plus-guest parking demand could range from 323 vehicles to 386 vehicles. In comparison, the KZC would require 459 resident/guest parking spaces—73 stalls more than even the highest estimate based on available data. Therefore, the request to reduce the KZC parking supply requirement by 58 parking spaces would not create adverse parking impacts. No reductions to the commercial parking requirement are requested.

Enclosure: *Revised Parking Modification Request*, Heffron Transportation, Inc., June 15, 2023

MCH/tsm

Comment Responses - Bridle Trails Parking Modification Request - 06-15-2023.docx

MEMORANDUM

Date: November 30, 2023

Project: Bridle Trails Residential (13033 NE 70th Place, Kirkland WA)
Project No. PRE22-00157

Subject: **Parking Modification Request – REVISED**

Author: Marni C. Heffron, P.E., P.T.O.E. 

This report presents the parking modification request for the Bridle Trails Residential project located at 13033 NE 70th Street (Parcel 1241500285) in the City of Kirkland. It has been revised from the prior version (dated June 15, 2023) to address the potential future conversion of residential amenity space to commercial use.

Kirkland Zoning Code (KZC) §105.103.3.c states:

For a modification to KZC 105.20 and 105.45, a decrease in the required number of spaces may be granted if the number of spaces proposed is documented by an adequate and thorough parking demand and utilization study to be sufficient to fully serve the use. The study shall be prepared by a licensed transportation engineer or other qualified professional, and shall analyze the operational characteristics of the proposed use which justify a parking reduction. The scope of the study shall be proposed by the transportation engineer and approved by the City Transportation Engineer. The study shall provide at least two (2) days of data for morning, afternoon and evening hours, or as otherwise approved or required by the City Transportation Engineer. Approval of a parking reduction shall be solely at the discretion of the City. A decrease in the minimum required number of spaces may be based in whole or part on the provision of nationally accepted TDM (transportation demand management) measures. Data supporting the effectiveness of the TDM measures shall be provided as part of the parking demand and utilization study and approved by the City Transportation Engineer.

1. Project Description and Parking Modification Request

The project site is located just south of NE 70th Place and just east of 130th Avenue NE, and is currently occupied by the existing Tech City Bowl. Per the latest site plan,¹ the project proposes to construct 368 residential units plus about 7,000 square feet (sf) of commercial space. The project would remove the existing Tech City Bowl, a 32,500-sf bowling alley with 32 bowling lanes, as well as an existing two-story commercial building that has about 3,430 sf of general retail space. The northwest corner of the block, which is occupied by Pagliacci Pizza, is not part of the development site.

¹ Weber Thompson Architects, November 4, 2022.

2. Code-Required Parking

The required number of parking spaces for various land uses is set forth in the Kirkland Zoning Code (KZC) §35.40 (Development Standards). The required parking spaces for “Attached or Stacked Dwelling Units” are as follows:

- 1.2 per studio unit.
- 1.3 per 1-bedroom unit.
- 1.6 per 2-bedroom unit.
- 1.8 per 3 or more-bedroom unit.

In addition, KZC §105.20 requires guest parking at a “*minimum of 10 percent of the total number of required parking spaces.*”

Table 1 summarizes the code-required parking supply for the proposed project. The code-required parking for the project’s residential component would be 558 spaces, which reflects a weighted average of 1.52 spaces per unit including the guest parking. The commercial use is required to provide 1 space for every 300 square feet (sf) of space (KZC §35.40.160) or 24 spaces. Overall, the code-required parking would be 534 spaces.

The project proposes to provide 425 total parking spaces, 401 parking spaces for residents/guests and 24 parking spaces for commercial uses. This reflects a reduction of 157 residential parking spaces compared to KZC requirements. No reduction in the commercial parking requirement is proposed.

Table 1. Parking Supply Requirement versus Proposed Supply

Kirkland Zoning Code Requirement			
Unit Size	Number of Units (% of All Units)	Parking Required per Existing KZC	Spaces Required
Studio	64 dwelling units (7%)	1.2 spaces / unit	77
1-bedroom	202 dwelling units (55%)	1.3 spaces / unit	263
2-bedroom	83 dwelling units (23%)	1.6 spaces / unit	133
3-bedroom	19 dwelling units (5%)	1.8 spaces / unit	34
Total	368 dwelling units		507
Residential Guest Parking	Add 10% (spaces / unit)		51
Total Residential	Weighted Rate (spaces / unit)	1.52 spaces / unit	558
Commercial Use	6,978 square feet	1 space per 300 sf	24
Total Required by Code			582
Proposed Supply		Stalls Proposed	Parking Deficit Compared to Code
Residential / Guest Stalls		401	-157
Commercial Parking		24	-0
Total		425	-157

Source: Heffron Transportation, Inc., November 2023. Program information from Weber Thompson Architects, June 2023.

3. Local Parking Data that Supports Parking Supply Modification

Many different local data sources were compiled and evaluated to estimate the parking demand associated with the proposed Bridle Trails project. These data show that the KZC requirements would substantially oversupply parking at the subject project. The data sources include the following.

- **King County Multi-Family Residential Parking Calculator (KCRPC)** – King County has created a database and model tool to estimate parking demand based on many location-specific metrics rather than just project size. It is one of the largest databases of residential parking data in the U.S., and reflects local King County conditions.
- **City of Kirkland and Redmond Parking Data** – The City of Kirkland commissioned an independent review of the KCRPC, to determine how well the model related to Kirkland projects. As part of this effort, the City collected additional parking demand data for many projects in the Cities of Kirkland and Redmond. These are further evaluated to show the correlation to per-unit and per-bedroom parking rates.
- **Parking data for new projects in Spring District and Overlake Neighborhoods** – Additional data were collected for relatively new residential projects located in Bellevue’s Spring District that are in the same tenant market as the proposed Bridle Trails project.
- **Parking data from other consultants** – Data from four multi-family residential projects collected by another consultant were also reviewed and considered.

Parking demand for the proposed project was estimated using two sources of local residential parking data. These are described below.

3.1. King County Multi-Family Residential Parking Calculator

The *King County Multi-Family Residential Parking Calculator (KCRPC)*,² was originally created by King County Metro in 2012 as part of a study that examined the relationship among several variables to help better plan parking supply throughout the County. The County recognized that constructing too much parking supply can result in higher levels of automobile ownership, vehicle travel, congestion, and development costs. With a grant from the Federal Highway Administration, Metro compiled information about multi-family residential parking use at more than 200 developments in King County over the winter and spring of 2012. Parking occupancy was recorded on Tuesdays, Wednesdays, and Thursdays between midnight and 5:00 A.M. in each multi-family development studied. Metro then developed a statistical model to estimate parking use based on building and environmental characteristics. King County updated the calculator in 2018 using new data collected at 75 additional sites throughout the county in 2017. The *RSPC* is one of the largest databases of residential parking demand in the country, and reflects local travel characteristics in King County. Overall, Metro collected data for 275 multi-family sites. For comparison, the Institute of Transportation Engineers’ national database for Multifamily Mid-Rise Housing in its *Parking Generation Manual* is based on no more than 73 study sites.³

The *Parking Calculator* predicts the parking demand for a multi-family residential project based on seven independent variables, each one of which demonstrated strong statistical correlation related to parking demand.⁴

- Gravity measure of Transit Frequency – a factor that accounts for both the quantity and proximity of transit service;
- Percent of units designated affordable;

² King County Metro, <https://rightsizeparking.org/>, accessed April 2023.

³ ITE, *Parking Generation Manual*, 5th Edition, 2019.

⁴ King County Metro, *Right Size Parking Final Report*, August 15, 2015. <https://metro.kingcounty.gov/programs-projects/right-size-parking/pdf/rsp-final-report-8-2015.pdf>

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- Average number of bedrooms in all units;
- Gravity measure of population and jobs;
- Size of unit;
- Average rent; and
- Parking price as a fraction of average rent.

When all seven of the factors listed below are considered, King County found a very strong correlation between the modelled results and actual observed demand.⁵

The site location and anticipated residential characteristics were entered into the King County RSPC. It returned an average per-unit rate of 0.94 spaces per unit, or 346 spaces. Further analysis of King County’s dataset for Kirkland and Redmond is provided in the next section.

3.2. Parking Rates for Projects in the Cities of Kirkland and Redmond

The City of Kirkland commissioned a study to review how well model output from the *King County Multi-Family Residential Parking Calculator* compared to actual experience for individual projects in Kirkland. This study, *Right Size Parking Web Calculator Estimates in Kirkland*,⁶ compared model estimates to the actual parking demand data for projects throughout Kirkland: seven sites in the downtown core area plus 17 sites outside of downtown. Those that are outside of downtown Kirkland were further evaluated herein since they best reflect conditions in the Bridle Trails neighborhood. The data reflect 2012 parking demand counts for 10 sites that King County had included in its original RSPC dataset, as well as 2014 parking demand counts for seven additional projects. It is noted that many paradigm shifts related to transportation, including the prevalence of shared mobility options such as Uber and Lyft, car share programs, and bike facility enhancements, had not yet been established when these data were collected. The database included many metrics about each project surveyed including the number of parking spaces, whether those were reserved for residents, and availability of on-street or other off-street parking. Each of the sites was surveyed to determine peak residential demand during the overnight hours. The demand counts tallied all vehicles parked on the site and did not differentiate between residents and guests.

The Fehr & Peers study concluded that, “Overall, the RSP web calculator [RSPC] is estimating parking utilization accurately for most of the selected sites in Kirkland, with 20 of the 24 sites within a 15 percent level of error. We do note, however, a slight tendency for the model to under-predict utilization.” It also found that, “in certain transit rich environments, the web calculator may be overestimating parking utilization.”

Most parking demand data—including parking data in the Institute of Transportation Engineers (ITE) *Parking Generation Manual*⁷ and the KCRPC described above—report parking demand as “vehicles per unit.” These rates do not account for different mixes of (e.g., studio versus 2-bedroom units). To overcome this limitation, some recent studies have derived a “per bedroom” parking demand rate that can then be applied to estimate parking need based on the planned unit mix. This is essentially the approach used by the KZC requirements that list different rates by unit size; however, there is no background about how the KZC rates were derived.

Therefore, further analysis to derive a rate per bedroom was performed using the dataset described above for 17 non-downtown Kirkland projects plus additional data provided by City of Kirkland staff for 19 residential projects in the City of Redmond. For both datasets, the number of units as well as the types of units were provided. This allowed the parking demand to be compared based on both the total number of units (which is the traditional way to assess parking demand) as well as on the number of bedrooms

⁵ R-squared values of 0.81.

⁶ Fehr & Peers, June 18, 2014.

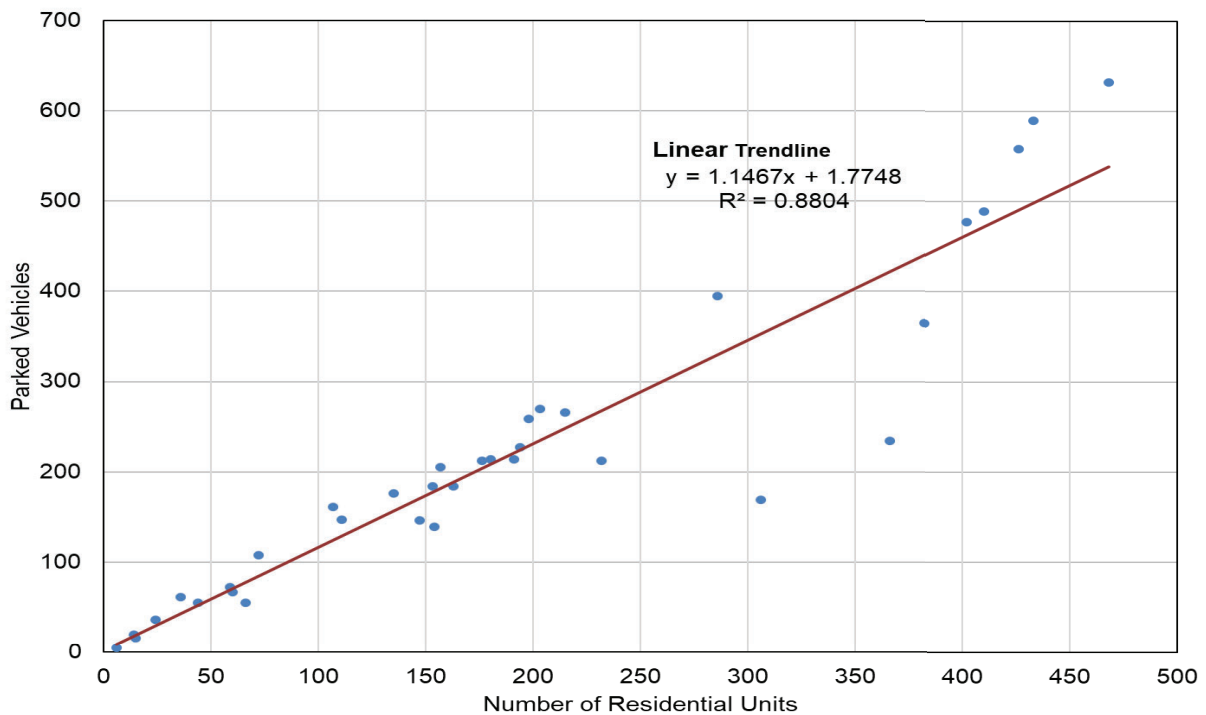
⁷ ITE, *Parking Generation Manual*, 5th Edition, 2019.

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(which is similar to the City of Kirkland’s zoning code approach to estimating parking supply requirements). Of the 36 residential projects in the dataset, 2% were studios, 36% were one-bedroom units, 39% were two-bedroom units, and 13% were three-bedroom units. The average unit size was 1.6 bedrooms.

Figure 1, which plots a linear regression of parking demand versus residential units, shows very good correlation with an R-squared value of 0.88.⁸ However, the correlation between parking demand and the number of bedrooms (the linear regression shown on Figure 2), is even higher with an R-squared value of 0.94. This shows that a rate “per bedroom” is a better predictor of parking supply than a rate “per unit.”

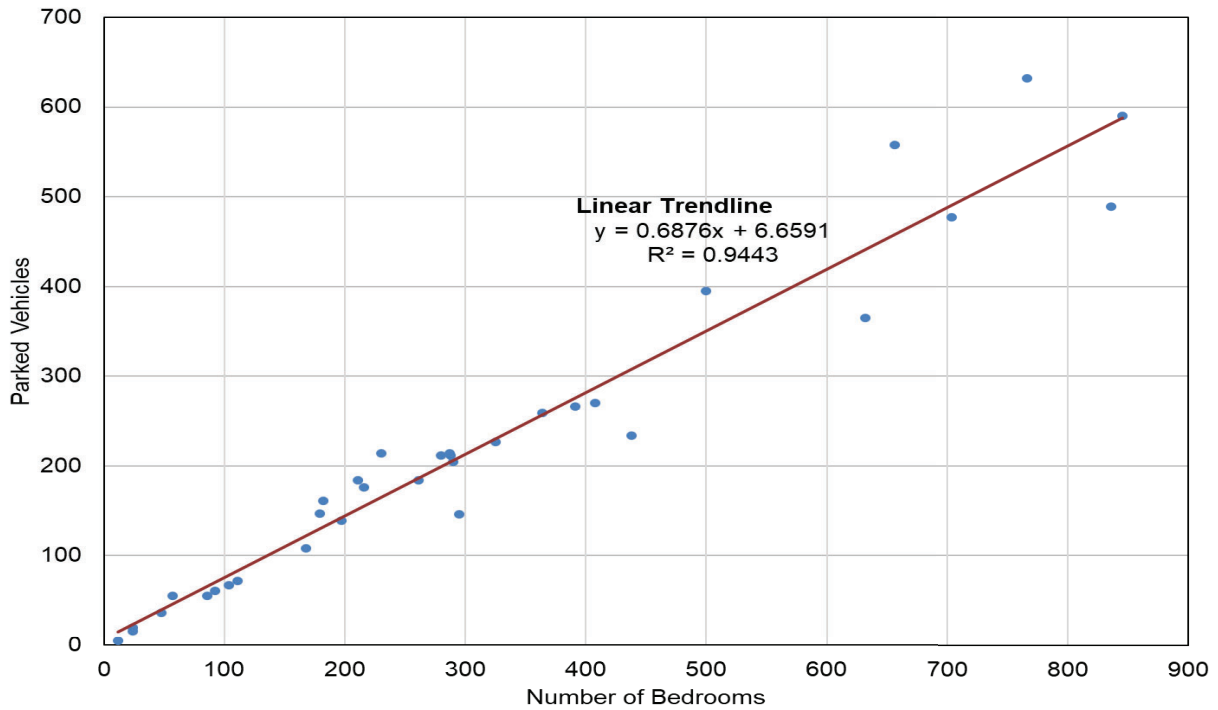
Figure 1. Parking Demand versus Residential Unit Count



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

⁸ R-squared is a statistical measure of how close the data are to the fitted regression line, specifically, how much variation of a dependent variable is explained by the independent variable(s) in a regression model. The higher the R-squared value, the better the model fits the data. An R-squared value of 1.0 would be a perfect fit.

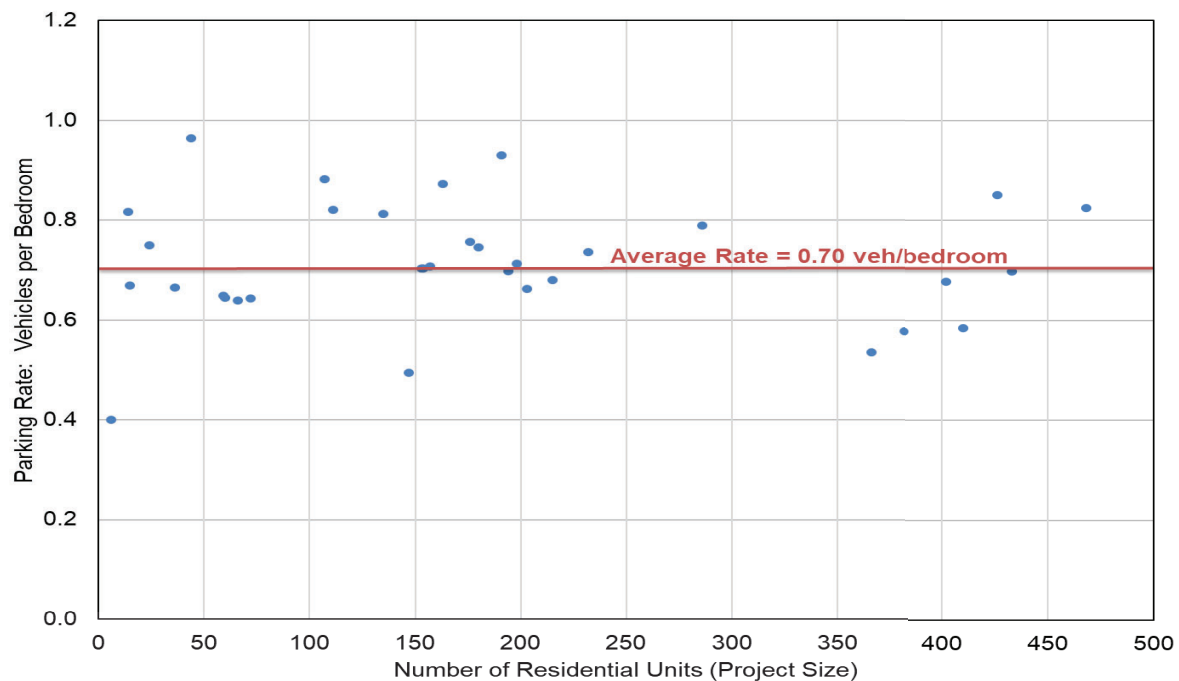
Figure 2. Parking Demand versus Number of Bedrooms



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

The average parking demand rate is 0.7 vehicles per bedroom as shown on Figure 3. This average rate is unrelated to the overall building size (in terms of total number of units). Most notable about these data is that not a single project had a parking rate above 1.0 vehicles per bedroom, which means that some residents in all of the projects likely live without a vehicle, are using one or more bedrooms for other purposes such as an in-home office, or are working an off-hours shift.

Figure 3. Parking Rate per Bedroom versus Project Size



Source: Data reflect parking demand for 36 projects in the City of Kirkland (17 outside of the downtown core) plus City of Redmond (19). Data were collected in 2012 by King County and in 2014 by Fehr & Peers. Data compiled for chart by Heffron Transportation, Inc., Oct. 2021.

The above information was used to estimate parking demand for the proposed residential project, which proposes 489 bedrooms in the 368 units. Using both the per-unit and per-bedroom demand rates derived from the local data, the residential uses are expected to have a peak parking demand between 342 vehicles and 424 vehicles.

3.3. Parking Data for Newer Residential Projects

New data were collected for six residential projects built within the past five years in the Spring District and Overlake neighborhoods. Project metrics (e.g., unit count by bedroom mix and number of parking spaces) were compiled from residential leasing databases; information related to project occupancy and parking demand were compiled from telephone interviews of building managers. Table 2 summarizes the project data and imputed parking rates, which reflect the parking demand if 100% of the residential units in each project were occupied. These projects had an average parking demand of 0.88 vehicles per unit or 0.66 vehicles per bedroom.

Compared to the Kirkland and Redmond dataset, these newer developments have higher proportions of small units with 16% studios and 53% one-bedroom units, and fewer large units (30% two-bedroom and 1% three-bedroom). The overall parking rate per unit was lower than derived for the local Kirkland and Redmond data (0.88 compared to about 1.15 vehicles per unit), but had a very similar per bedroom rate (0.66 compared to 0.70 per bedroom). This analysis shows that the per-bedroom rate can be reliably applied to projects that have a different mix of uses than those in the underlying dataset.

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Table 2. Parking Demand Rates for Projects in Spring District and Overlake Neighborhoods (2021)

Project Name	Address	Number of Units	Number of Bedrooms	# of Parking Spaces	Unit Occupancy Rate	Parking Occupancy Rate	Imputed Demand	
							(Assumes 100% Unit Occupancy) (Veh/Unit)	(Veh/Bedroom)
Sparc	1201 – 121 st Avenue NE	310	409	255	96%	100%	0.86	0.65
Hyde Square Apartments	2038 – 155 th Place NE	617	785	639	96%	72%	0.78	0.61
AMLI Spring District	1375 – 121 st Ave NE	204	299	265	97%	90%	1.20	0.82
Arras Apartments	12282 NE 12 th Lane	279	396	242	96%	100%	0.90	0.64
Bell Overlake	3040 – 148 th Ave NE	243	284	393	100%	45%	0.73	0.62
Modera Redmond	8709 – 161 st Ave NE	300	369	295	90%	72%	0.79	0.64
Average		326	424	348			0.88	0.66

Source: Weber Thompson, Mill Creek Residential, November, 2021.

3.4. Parking Data from Other Consultant Studies

Data for four multi-family residential projects in Bothell were presented in the *Totem Lake Apartments Parking Supply Reduction Request*.⁹ Although the Totem Lake Apartments are subject to different KZC requirements, the data collected for its reduction request are relevant. The four projects in Bothell had a calculated parking demand rate of 1.05 vehicles per unit.

4. Summary of Residential Parking Demand for Bridle Trails

The parking rates derived from the various sources listed above were applied to the Bridle Trails project's residential component. Table 3 summarizes all of the findings and resulting parking demand. The study's results are relatively similar, ranging from 323 vehicles to 386 vehicles. It is noted that these demand values include resident plus guest parking. In comparison, the KZC would require 558 residential parking spaces—172 stalls more than even the highest estimate based on available data. Therefore, the request to reduce the KZC parking supply requirement for the residential use to 401 parking spaces would not create adverse parking impacts.

Table 3. Parking Demand Estimates for Bridle Trails

Parking Study Dataset	Number of Sites Surveyed	Parking Demand Rate	Applicable Bridle Trails Metric	Parking Demand
King County Right Size Parking	275	0.94 per unit	368 units	346 vehicles
Kirkland & Redmond Sites	36	0.70 per bedroom	489 bedrooms	342 vehicles
Spring District & Overlake Sites	6	0.66 per bedroom	489 bedrooms	323 vehicles
Bothell Sites	4	1.05 per unit	368 units	386 vehicles

Sources: see full descriptions of sources earlier in this memorandum.

5. Parking and Transportation Demand Management

The Bridle Trails project would implement several Parking and Transportation Demand Management measures to reduce parking demand. These measures include:

- Charging residents for parking;
- Unbundling the cost of parking from apartment rent;
- Providing information to prospective tenants about the site's parking policies and near-site transportation alternatives; and
- Signing commercial stalls for commercial tenants only during hours that those businesses are open to the public.

⁹ Transpo Group, June 16, 2021.

6. Accommodation of Future Commercial Space

Although not currently proposed, there is a residential amenity space in the building's southeast corner that could be partially or fully converted to commercial space. It is estimated that the space could accommodate between 750 sf and 2,400 sf of commercial use. This would require between three (3) and eight (8) additional parking spaces at the existing code-required rate of 1 space per 300 sf.

The analysis performed herein determined that there is likely to be excess resident/guest parking available to accommodate the commercial use's required parking. Many commercial uses (e.g., services such as salon or accountant) generate peak parking demand during typical daytime business hours (9:00 A.M. to 6:00 P.M.) when the amount of available parking would be highest since resident and guest parking typically peak in the evening and overnight hours. During these hours, more than 50 stalls are expected to be available to share with commercial uses. Commercial uses that generate a peak demand in the evening hours (e.g., a restaurant) may require additional study of the site's actual residential and guest parking demand to determine if the new use can be accommodated and/or if changes to on-site parking management or TDM strategies would be needed. These additional studies, if needed, would be performed as part of the permitting process for a future change-of-use.

7. Summary

The project proposes to provide 425 total parking spaces, 401 parking spaces for residents and guests, and 24 parking spaces for the proposed commercial uses. This is 157 fewer spaces than the 582 spaces required by the City of Kirkland Zoning code.

Analyses of extensive data from four different datasets concluded that the residential plus guest parking demand could range from 323 vehicles to 386 vehicles. In comparison, the KZC would require 558 resident/guest parking spaces—172 stalls more than even the highest estimate based on available data. Therefore, the request to reduce the KZC parking supply for residential uses to 401 parking spaces would not create adverse parking impacts. No reductions to the commercial parking requirement are requested.

The project would implement parking and transportation demand management programs to reduce parking demand and potential parking overspill. These were listed previously in Section 5.

Although not currently proposed, in the future the project could convert 750 to 2,400 square feet of residential amenity space to commercial use. This would require up to 8 additional parking spaces based on the current code requirement. Daytime-focused commercial uses could share parking designated for residential guests since those uses generate peak parking at different times of day. Commercial uses that generate a peak demand in the evening hours (e.g., a restaurant) may require additional study of the site's actual residential and guest parking demand to determine if the new use can be accommodated and/or if changes to on-site parking management or TDM strategies would be needed. These additional studies, if needed, would be performed as part of the permitting process for a future change-of-use.

MCH/tsm

**CITY OF KIRKLAND**

Department of Public Works
123 Fifth Avenue, Kirkland, WA 98033
425.587.3800 - www.kirklandwa.gov

MEMORANDUM

Date: December 3, 2023

To: Tony Leavitt, Senior Planner
Jon Regala, Planning Supervisor

From: Thang T Nguyen, Transportation Engineer

File No.: TRAN23-00292

Subject: **Modera Bridle Trails Parking Modification Review**

INTRODUCTION

This memo summarizes my review of the proposed parking requirement pursuant to Kirkland Zoning Code (KZC) 105.25. I have received and reviewed the following document(s):

- Parking Modification Request Memo prepared by Heffron Transportation Inc., dated April 13, 2023
- Response to City of Kirkland Parking Modification Comments prepared by Heffron Transportation Inc., dated June 15, 2023
- Parking Modification Request-REVISED prepared by Heffron Transportation Inc., dated November 30, 2023
- Parking Modification Request Response Modera Bridle Trails Project, dated August 4, 2023

This review is required because the applicant is proposing less parking than requirements found in KZC 35.40 and 105.20. The purpose of my review is to analyze the applicant's parking study, parking data and provide recommendations based on the criteria found in KZC 35.40 and 105.20.

PROJECT DESCRIPTION

The development is located on parcel 1241500285, located on the southwest corner of the intersection of NE 70th Street/132nd Avenue NE in the Bridle Trails shopping center. Three driveways are proposed, one off NE 70th Street, and two off 130th Avenue NE, at the west property line. The driveways will provide access to the development's parking garage and for emergency access along the south side of the building. The applicant proposes to build 368 units of mid-rise apartment and 7,000 square feet of miscellaneous

retail. The project is currently expected to open by the end of 2026. Although not proposed with the SEPA review of the development project, there are 750 to 2,400 square feet of amenity space in the building's southeast corner that was shown to the Design Review Board (DRB) as potential commercial space in the future.

PROPOSED AND REQUIRED PARKING SUPPLY

The applicant is proposing to provide 425 parking spaces, of which, 401 will accommodate residents (361 spaces) and their guests (40 spaces) and 24 spaces will be designated as commercial parking. The proposed parking supply for the development equates to 0.98 spaces per unit (361 spaces per 368 units) or 0.74 spaces per bedroom (361 spaces per 489 bedrooms).

Per the zoning code 35.40, the applicant is required to provide 507 parking spaces for the residents. In addition to the required parking for residents, KZC 105.20.3.a requires that an amount of 10% (51 visitor parking spaces) of the required parking for residents be provided as guest parking. The total parking spaces required for the residential use would be 558.

The project site is located within the BCX commercial zone. The BCX zone allows developers to provide the parking demand without adding a 15% increase above their demonstrated parking demand rate as required under KZC 105.103.c. The KZC 35.40 requires commercial retail uses within the BCX commercial zone to provide one parking space per 300 square feet of floor area. For the proposed 7,000 square feet of retail use, the development is required to provide 24 parking spaces. The code parking requirements for this development are summarized in column 5 of Table 1. As summarized in Table 1, a total 582 spaces are required per the zoning code. The proposed parking supply is 157 spaces short of the zoning requirement.

Table 1. Kirkland Zoning Code Parking Requirements

<u>Proposed Development</u>	<u>Number of Units</u>	<u>Number of Bedrooms</u>	<u>Parking Rates, Per KZC 35.40</u>	<u>Number of Parking Spaces Required under KZC 35.40</u>	<u>Proposed</u>	<u>Deficit</u>
Studio Units	64 units	64	1.2 per unit	77		
One Bedroom Units	202 units	202	1.3 per unit	263		
Two Bedroom Units	83 units	166	1.6 per unit	133		
Three Bedroom Units	19 units	57	1.8 per unit	34		
<i>Sub-Total</i>	<i>368</i>	<i>489</i>	<i>1.38 per unit or 1.04 per bedroom</i>	<i>507</i>		
Guest Parking, KZC 105.20			10% of Required Parking	51		
Multifamily Total				558	401	-157
Commercial	7,000 sf		1 per 300 Square feet	24	24	0
Total				582	425	-157

PARKING SUPPLY ANALYSIS

Heffron Transportation Inc reviewed four parking datasets to determine whether the proposed parking supply is adequate for the proposed development: the King County Right Size Parking calculator, the Kirkland & Redmond dataset, the dataset for the Spring District & Overlake sites and the dataset for the Bothell sites. Table 2 summarized the parking demand rates and the calculated parking demand for each dataset; these parking demand rates are inclusive of visitor parking. The datasets for the King County Right Size Parking and the Bothell sites provided parking demand rates based on the number of units, while the datasets for the Kirkland & Redmond sites and the Spring District & Overlake sites provided parking rates based on bedrooms.

The King County Right Size Parking calculator predicts parking demand based on the percent of designated affordable units, bedroom unit mix, the concentration of population, jobs and transit service, the average cost of rent and parking costs; based on the calculator the proposed multifamily development would have a parking demand rate of 0.94 parking spaces per unit. It has been staff general practice to not accept the results from the King County parking calculator for a parking modification because the data from

which the calculator was found to be biased towards the Seattle metropolitan area and is not representative of Kirkland's transportation environment and parking demand.

Table 2. Parking Datasets

Parking Study Datasets	Number of Sites Surveyed	Parking Demand Rates	Bridle Trails Metric	Resulting Parking Demand
King County Right Size Parking	275	0.94 per unit	368 units	346
Kirkland & Redmond Sites	36	0.71 per bedroom	489 bedrooms	350
Spring District & Overlake Sites	6	0.66 per bedroom	489 bedrooms	323
Bothell Sites	4	1.05 per unit	368 units	387

Staff reviewed parking data from apartments located in the City of Bothell as part of a parking modification review for a proposed apartment development to be located in Totem Lake and found that the average parking demand is 1.05 spaces per unit or 0.42 spaces per bedroom. Staff does not believe this dataset is applicable to the proposed development because the size of the developments in Bothell are half the size of the proposed development and the location of the apartments is close to a major regional highway with better transit services than the proposed project.

Heffron Transportation Inc also reviewed 36 sites located in Kirkland and Redmond, but the bedroom counts were available to only 34 sites; Table 3 presents that dataset. Their bedroom unit mix is shown in Table 4. Common to the proposed project, 75% of the units at the Kirkland and Redmond sites are 1 and 2-bedrooms. The plotted linear regression of parking demand from the dataset suggests that using the parking rate per bedroom would provide a more accurate estimation of parking demand because the R^2 value (0.94) is closer to 1.0 than the R^2 value (0.88) based on the parking per unit plot. The datasets show that 18 out of 34 of the sites have a parking demand less than 0.71 spaces per bedroom and all the sites have a parking demand of less than 1.0 space per bedroom.

Table 3. Kirkland & Redmond Dataset

Sites	Site #	Location	# of Units (Occupied)	# of Bedrooms (Occupied)	Parking Demand	Parking Rate per Unit	Parking Rate per Bedroom
Kirkland	1	Bridle Trails	107	182	161	1.5	0.88
Kirkland	2	Lakeview	286	500	395	1.38	0.79
Kirkland	3	Totem Lake	198	364	259	1.31	0.71
Kirkland	4	Totem Lake	191	230	214	1.12	0.93
Kirkland	5	S Juanita	163	211	184	1.13	0.87
Kirkland	6	S Juanita	15	24	16	1.07	0.67
Kirkland	7	S Juanita	366	438	234	0.64	0.53
Kirkland	8	S Juanita	468	766	632	1.35	0.82
Kirkland	9	Moss Bay	154	197	139	0.9	0.70
Kirkland	10	North Rose Hill	44	57	55	1.25	0.96
Kirkland	11	Highland Park	6	12	5	0.8	0.40
Kirkland	12	Park Terrace	14	24	20	1.4	0.82
Kirkland	13	Houghton Court	24	48	36	1.5	0.75
Kirkland	14	Affinity	36	92	61	1.7	0.67
Kirkland	15	Sancerra	135	216	176	1.3	0.81
Kirkland	16	Portsmith	153	261	184	1.2	0.70
Kirkland	17	Wild Glen	72	168	108	1.5	0.64
Redmond	1	Gates of Redmond	176	280	212	1.20	0.76
Redmond	2	Lionsgate Townhomes	194	325	227	1.17	0.70
Redmond	3	Olde Redmond Place	180	287	214	1.19	0.75
Redmond	4	Peloton	147	295	146	0.99	0.49
Redmond	5	Red 160	232	288	212	0.91	0.74
Redmond	6	Redmond Hill East	433	845	590	1.36	0.70
Redmond	7	Redmond Hill West	426	656	558	1.31	0.85
Redmond	8	Village at Overlake Station Apartn	306		169	0.55	
Redmond	9	Avalon Parcsquare North	59	111	72	1.22	0.65
Redmond	10	Avalon Parcsquare South					
Redmond	11	Avalon Redmond Place	215	391	266	1.24	0.68
Redmond	12	Bon Terra	60	104	67	1.12	0.64
Redmond	13	Chelsea Square	111	179	147	1.32	0.82
Redmond	14	Delano	66	86	55	0.83	0.64
Redmond	15	Elevation Apartment Homes	157	290	205	1.31	0.71
Redmond	16	Evans Creek	203	408	270	1.33	0.66
Redmond	17	The Trails of Redmond	402	703.5	477	1.19	0.68
Redmond	18	The Onyx	382	632	365	0.96	0.58
Redmond	19	Archstone Redmond Campus	410	836	489	1.19	0.58
Average			188	309	218	1.18	0.71
Bridle Trails				489.00			
Bridle Trails Parking Req.							350.00

Table 4. Unit Mix Comparison

Sites	Studio	1-bedroom	2-bedroom	3-bedroom
Proposed Project	17%	55%	23%	5%
Kirkland & Redmond Sites	2%	36%	39%	13%
Bellevue: Spring District & Overlake	16%	53%	30%	1%

Because the Kirkland and Redmond sites have a significantly different unit mix than the proposed project, additional data were collected at six sites in the Spring District & Overlake areas that have the similar unit mix as the proposed project. Table 5 presents the parking data. These sites have an average parking demand of 0.84 spaces per unit and 0.64 spaces per bedroom. This set of data provides a better representation of the parking demand based on the unit mix.

Table 5. Spring District & Overlake Parking Data

Name	# of Units	Total # of Bedrooms	# of parking stalls occupied	Space per unit	Space per bedroom
Our Site					
Sparc	310	409	255	0.82	0.62
Hyde Square Apartments	617	785	461	0.75	0.59
AMLI Spring District	204	299	239	1.17	0.80
Arras Apartments	279	396	242	0.87	0.61
Bell Overlake	243	284	177	0.73	0.62
Modera Redmond	300	369	213	0.71	0.58
Average				0.84	0.64

An approach to provide a more robust dataset is to add the data from the Spring District & Overlake dataset to the Kirkland and Redmond dataset, staff combined the two datasets resulted in parking rates of 1.13 parking spaces per unit with an R^2 of 0.81 and 0.70 parking spaces per bedroom with an R^2 of 0.94. The rate per bedroom provides a more accurate parking demand because the R^2 confidence level is closer to 1.0. Based on the average parking demand rate per bedroom, the proposed project would require 343 parking spaces at 0.70 spaces per bedroom. Table 6 presents the dataset for Kirkland,

Redmond, the Spring District and Overlake and Table 7 summarizes the result of that dataset.

Table 6. Combined Datasets

Sites	Site #	Location	# of Units (Occupied)	# of Bedrooms (Occupied)	Parking Demand	Parking Rate per Unit	Parking Rate per Bedroom
Kirkland	1	Bridle Trails	107	182	161	1.5	0.88
Kirkland	2	Lakeview	286	500	395	1.38	0.79
Kirkland	3	Totem Lake	198	364	259	1.31	0.71
Kirkland	4	Totem Lake	191	230	214	1.12	0.93
Kirkland	5	S Juanita	163	211	184	1.13	0.87
Kirkland	6	S Juanita	15	24	16	1.07	0.67
Kirkland	7	S Juanita	366	438	234	0.64	0.53
Kirkland	8	S Juanita	468	766	632	1.35	0.82
Kirkland	9	Moss Bay	154	197	139	0.9	0.70
Kirkland	10	North Rose Hill	44	57	55	1.25	0.96
Kirkland	11	Highland Park	6	12	5	0.8	0.40
Kirkland	12	Park Terrace	14	24	20	1.4	0.82
Kirkland	13	Houghton Court	24	48	36	1.5	0.75
Kirkland	14	Affinity	36	92	61	1.7	0.67
Kirkland	15	Sancerra	135	216	176	1.3	0.81
Kirkland	16	Portsmith	153	261	184	1.2	0.70
Kirkland	17	Wild Glen	72	168	108	1.5	0.64
Redmond	18	Gates of Redmond	176	280	212	1.20	0.76
Redmond	19	Lionsgate Townhomes	194	325	227	1.17	0.70
Redmond	20	Olde Redmond Place	180	287	214	1.19	0.75
Redmond	21	Peloton	147	295	146	0.99	0.49
Redmond	22	Red 160	232	288	212	0.91	0.74
Redmond	23	Redmond Hill East	433	845	590	1.36	0.70
Redmond	24	Redmond Hill West	426	656	558	1.31	0.85
Redmond	25	Village at Overlake Station Apartm	306		169	0.55	
Redmond	26	Avalon ParcSquare North	59	111	72	1.22	0.65
Redmond	27	Avalon ParcSquare South					
Redmond	28	Avalon Redmond Place	215	391	266	1.24	0.68
Redmond	29	Bon Terra	60	104	67	1.12	0.64
Redmond	30	Chelsea Square	111	179	147	1.32	0.82
Redmond	31	Delano	66	86	55	0.83	0.64
Redmond	32	Elevation Apartment Homes	157	290	205	1.31	0.71
Redmond	33	Evans Creek	203	408	270	1.33	0.66
Redmond	34	The Trails of Redmond	402	703.5	477	1.19	0.68
Redmond	35	The Onyx	382	632	365	0.96	0.58
Redmond	36	Archstone Redmond Campus	410	836	489	1.19	0.58
	37	Sparc	310	409	255	0.82	0.62
	38	Hyde Square Apartments (I & II	617	785	461	0.75	0.59
Spring Dist & Overlake	39	AMLI Spring District	204	299	239	1.17	0.80
	40	Arras Apartments	279	396	242	0.87	0.61
	41	Bell Overlake	243	284	177	0.73	0.62
	42	Modera Redmond	300	369	213	0.71	0.58
Average			208	326	225	1.13	0.70
Bridle Trails Bedrooms						489	489
Bridle Trails Demand per Ave. Rate						553	343

Table 7. Bellevue, Kirkland and Redmond Dataset Summary

Combined Parking Study Datasets	Number of Sites Surveyed	Parking Demand Rates	Bridle Trails Metric	Resulting Parking Demand
Kirkland, Redmond, Spring Dist., and Overlake combined dataset	42	0.70 per bedroom	489 bedrooms	343

The proposed parking supply for the development equates to 0.98 spaces per unit or 0.74 spaces per bedroom (exclusive of the visitor parking). However, if the commercial parking is shared with the residents or their visitors during off-peak then the parking supply for the residential use would equal to 1.05 spaces per unit or 0.79 space per bedroom as summarized in Table 8.

Table 8. Modera Parking Supply

Modera	Unit	Bedrooms	Parking Supply		Total Apartment Parking	Parking Rate per Unit	parking Rate per Bedroom
			Residents	Visitors			
Apartments	368	489	361	40	401	0.98	0.74
Commercial			24				
Shared	368	489	385	40	425	1.05	0.79

The ITE Parking Generation publication provides shared parking data. Table 9 shows the benefit of shared parking. As shown, the proposed shared parking supply will ensure that the development would not impact the neighboring developments.

Table 9. Weekday Hourly Parking Demand

		Multi-family 221		Tenant Reserved Parking	Tenant Shared Parking	MF Visitor Parking		Commercial Shopping Center		Total Shared Required	Shared Supply	Shared Deficit/Surplus
		Hourly Variation	Hourly Parking Demand			Hourly Variation	Hourly Parking Demand	Hourly Variation	Hourly Parking Demand			
Demand			361	361	0		40		24		64	
	6:00 AM	83%	300	361	0	10%	4	0%	0	4	64	60
	7:00 AM	71%	257	361	0	20%	8	0%	0	8	64	56
	8:00 AM	61%	221	361	0	20%	8	15%	4	12	64	52
	9:00 AM	55%	199	361	0	20%	8	32%	8	16	64	48
	10:00 AM	54%	195	361	0	20%	8	54%	13	21	64	43
	11:00 AM	53%	192	361	0	20%	8	71%	18	26	64	38
	12:00 PM	50%	181	361	0	20%	8	99%	24	32	64	32
	1:00 PM	49%	177	361	0	20%	8	100%	24	32	64	32
	2:00 PM	49%	177	361	0	20%	8	90%	22	30	64	34
	3:00 PM	50%	181	361	0	20%	8	83%	20	28	64	36
	4:00 PM	58%	210	361	0	20%	8	81%	20	28	64	36
	5:00 PM	64%	232	361	0	40%	16	84%	21	37	64	27
	6:00 PM	67%	242	361	0	60%	24	86%	21	45	64	19
	7:00 PM	70%	253	361	0	100%	40	80%	20	60	64	4
	8:00 PM	76%	275	361	0	100%	40	63%	16	56	64	8
	9:00 PM	83%	300	361	0	100%	40	42%	11	51	64	13
	10:00 PM	90%	325	361	0	100%	40	15%	4	44	64	20
	11:00 PM	93%	336	361	0	80%	32	0%	0	32	64	32
	12:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	1:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	2:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	3:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	4:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	5:00 AM	94%	340	361	0	50%	20	0%	0	20	64	44

Parking Modification Requirements

The KZC 105.103.3.c Parking Modification requires developers to implement a transportation management plan for all stalls associated with the development; and confirmation that parking charges will be unbundled from the leases for the development.

The applicant proposes to implement several parking and TDM measures to reduce parking demand. They include:

1. Charging residents for parking.
2. Unbundling the cost of parking from apartment rent.
3. Providing information to prospective tenants about the site's parking policies and near-site transportation alternatives.
4. Signing commercial stalls for commercial tenants only during hours that those businesses are open to the public (shared parking).

FINDINGS AND RECOMMENDATIONS

Based on the analysis, staff recommends the applicant provide 361 parking spaces for the residents, 40 parking spaces for the residential visitors as proposed by the applicant and 24 parking spaces for the commercial. In addition, the commercial parking should be shared with the residents and their visitors after 7 PM or after business hours every day. As required by the KZC 105.103.3.c, the applicant shall implement parking and TDM measures to reduce parking demand and incentivize residents to use other modes of transportation.

As required by the KZC 105.103.3.c, the applicant shall implement parking and TDM measures to reduce parking demand and incentivize residents to use other modes of transportation. As part of the SEPA determination for the project, the applicant agreed to a Transportation Management Plan to reduce the traffic impacts of the project (see Attachment 1).

Based on the findings, I recommend approval of the parking modification with the condition that the following measures are included in the applicant proposed TMP. These measures will minimize parking impacts to the adjacent properties and ensure that there will be adequate mitigation measures to control spillover parking:

1. Allocate 24 parking spaces for the commercial use. These parking spaces may be shared by all users (residents or visitors to the residents) between 7 P.M. and 6 A.M. on weekdays and all day on weekend days. These parking spaces may not be gated nor assigned to the apartment tenants.
2. Allocate 40 parking spaces for visitors. These spaces may not be gated nor assigned to the apartment tenants or commercial tenants.

Notes:

1. Based on average parking cost in Bothell as described in the Polaris Apartment development parking review located in Totem Lake.
2. Based on 5% bike share mode split. Residents living in the Bridle Trails area have a 9% bike and walk mode split as documented in the Heffron Transportation Inc.'s transportation impact analysis report for the Modera development.

The final TMP document shall be approved by the City transportation engineer and recorded by the applicant prior issuance of the final building permit.

Potential Additional Commercial Space

Although not proposed with the SEPA review of the development, there are 750 to 2,400 square feet of amenity space in the building's southeast corner that was shown to the Design Review Board (DRB) as potential commercial space in the future. The conversion of the amenity space would require 3 to 8 additional parking spaces. Staff has assessed the parking impact of the amenity space with the analysis of shared parking. Based on the shared parking analyses, there will be a deficit of two spaces between 7 P.M. to 8 P.M. during the weekday. Table 10 shows the hourly shared parking demand for the development. Two thousand square feet of the amenity space can be converted to commercial use (non-medical or fitness use) without parking overflow. The different types of commercial use have a large range of parking demand. Therefore, any commercial use proposed for the amenity space should be subject to a parking modification review for that specific business.

Table 10. Weekday Suburban Shared Parking Demand

		Multi-family 221		Tenant Reserved Parking	Tenant Shared Parking	MF Visitor Parking		Commercial Shopping Center		Total Shared Required	Shared Supply	Shared Deficit/Surplus
		Hourly Variation	Hourly Parking Demand			Hourly Variation	Hourly Parking Demand	Hourly Variation	Hourly Parking Demand	Visitors + Commercial Hourly Demand	Visitors + Commercial	
Demand			361	361	0		40		32		64	
	6:00 AM	83%	300	361	0	10%	4	0%	0	4	64	60
	7:00 AM	71%	257	361	0	20%	8	0%	0	8	64	56
	8:00 AM	61%	221	361	0	20%	8	15%	5	13	64	51
	9:00 AM	55%	199	361	0	20%	8	32%	11	19	64	45
	10:00 AM	54%	195	361	0	20%	8	54%	18	26	64	38
	11:00 AM	53%	192	361	0	20%	8	71%	23	31	64	33
	12:00 PM	50%	181	361	0	20%	8	99%	32	40	64	24
	1:00 PM	49%	177	361	0	20%	8	100%	32	40	64	24
	2:00 PM	49%	177	361	0	20%	8	90%	29	37	64	27
	3:00 PM	50%	181	361	0	20%	8	83%	27	35	64	29
	4:00 PM	58%	210	361	0	20%	8	81%	26	34	64	30
	5:00 PM	64%	232	361	0	40%	16	84%	27	43	64	21
	6:00 PM	67%	242	361	0	60%	24	86%	28	52	64	12
	7:00 PM	70%	253	361	0	100%	40	80%	26	66	64	-2
	8:00 PM	76%	275	361	0	100%	40	63%	21	61	64	3
	9:00 PM	83%	300	361	0	100%	40	42%	14	54	64	10
	10:00 PM	90%	325	361	0	100%	40	15%	5	45	64	19
	11:00 PM	93%	336	361	0	80%	32	0%	0	32	64	32
	12:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	1:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	2:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	3:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	4:00 AM	100%	361	361	0	50%	20	0%	0	20	64	44
	5:00 AM	94%	340	361	0	50%	20	0%	0	20	64	44

Tony Leavitt

From: Oliver Chen <oliverch@uw.edu>
Sent: Tuesday, November 7, 2023 6:20 PM
To: Tony Leavitt
Subject: Public comment: TRAN23-00292

CAUTION/EXTERNAL: This email originated from outside the City Of Kirkland. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi,

I strongly support the reduction in parking proposed by the developer. Modera Bridle Trails is well situated: it's located next to a grocery store, near amenities like Bridle Trails State Park, restaurants, and cafes, and on an existing high frequency transit line (route 245).

Kirkland property prices are skyrocketing and reducing parking requirements can help reduce the price of housing.

Best,
Oliver Chen
921 2nd Ave #5, Kirkland WA 98033

Tony Leavitt

From: Kathleen Lester <kathy@weareallaboutcats.com>
Sent: Tuesday, November 14, 2023 3:07 PM
To: Tony Leavitt
Subject: Response regarding parking stall zoning modification, permit #TRAN23-00292

CAUTION/EXTERNAL: This email originated from outside the City Of Kirkland. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Regarding permit #TRAN23-00292

Dear Tony Leavitt,

We are small business owners in the Bridle Trails Shopping Center. We urge the City of Kirkland and/or the City of Kirkland's Planning and Building Department to not approve the parking modification requested by Mill Creek Residential.

We strongly feel that the required average of 1.14 parking stalls per unit should remain in place. If the number of parking stalls required is reduced, then there will be inevitable spillover by apartment residents and residents' guests into the Bridle Trails Shopping Center parking lot. We have a limited number of parking stalls directly in front of our clinic; because of this, some of our clients must park further from our clinic. Increased competition for these parking stalls would mean that our employees and clients may have to park even further away from our business. This could negatively impact our business if clients decide they will longer bring their cats to us because the parking lot is too full, or is too difficult and dangerous to navigate. This parking lot is already very busy, and we have observed many drivers on a daily basis who speed through the parking lot, putting pedestrians (and for our clients, their cats) at risk.

Thank you for your consideration.

Sincerely,

Richard Lester, DVM and Owner
Kathy Lester, Practice Manager and Owner
All About Cats Veterinary Hospital

425-636-8201
kathy@weareallaboutcats.com
6501 132nd Ave NE, Kirkland WA 98033
Hours: Monday-Friday, 9:00-5:00
www.weareallaboutcats.com



November 14, 2023

Via Email

Tony Leavitt, tleavitt@kirklandwa.gov

RE: Oppose Parking Reduction TRAN23-00292

Dear Mr. Leavitt:

Retail Opportunity Investments Corp. (ROIC) owns and operates 93 shopping centers in the western United States. ROIC is the majority owner at the Bridle Trails shopping center, located adjacent to the proposed development at 13033 NE 70th Place. Throughout the Bridle Trails planning process, ROIC worked closely with the City of Kirkland (City) to help make the Bridle Trails redevelopment concept a reality. Sometimes this collaboration resulted in difficult conversations, but we found that basing planning and permitting decision on data and longstanding real estate experience is necessary to make the City's vision a success. We have carefully monitored the applicant's design review process (DRV23-00164), which improved through the design review process. We are now monitoring the traffic and parking review process.

ROIC opposes the requested parking reduction in TRAN23-00292 because the proposal does not satisfy the City's approval criteria in KZC 105.103.3.c. The code authorizes a discretionary parking reduction *only* when the proposed reduced parking is "sufficient to **fully** serve the use." As demonstrated by the record supporting the application, the applicant is not proposing an adequate number of parking stalls to **fully** serve each use in the proposal. For this reason alone, we ask that the City comply with its code and deny that application. The proposed parking only **partially** serves the uses located at the property. Among other items, the applicant's own application concedes that it relies on materials with a 15% level of error.¹ It is highly unlikely that the model underpredicts utilization due to transit. While there is bus service, this area is not a transit-rich area like the 85th Street Station Area. The requested parking reduction, if approved, will result in spill-over traffic and parking.

TMP condition 14 regarding spillover is appreciated, but it is inadequate. Once the building is constructed, it cannot add additional underground parking. The City has one chance to get this right. The proposal should be constructed with parking that fully serves each use.

From a planning perspective, the parking reduction proposal will harm the City's redevelopment efforts at Bridle Trails. In the applicant's design review materials, ROIC appreciates the applicant's statement that "neighboring property's parking is **inaccessible and not allowed to be used by the new development**."² However, ROIC's parking is not "inaccessible" from the applicant's property. In fact, ROIC's property is very accessible from the

¹ Heffron Transportation Inc Parking Modification Request – REVISED, dated November 2, 2023, p. 5 (citing Fehr & Peers study)

² Design Review Packet for Modera Bridle Trails dated July 17, 2023, re Southern Frontage Conditions. Page. 66 of the packet. Emphasis added.

applicant's property. The applicant's property and ROIC's property are connected through public and private drive aisles. The applicant's image included in its design review packet demonstrates this point (viewpoint from applicant's property to ROIC's property):



The applicant's proposed parking reduction will result in spill-over traffic and parking onto ROIC property and other property in the vicinity. Spill-over will create congestion, mobility, and safety issues. These issues would undercut many of the City's desired Bridle Trail amenities and planning concepts. For example, vehicular congestion and safety issues are incompatible with the City's desired through-block pathways and gathering places. For this reason alone, the City should deny the request under KZC 105.103.3.c. ("Approval of a parking reduction shall be **solely at the discretion of the City**"). Emphasis added.

Thank you for your consideration of this letter. If it would be helpful for the City's review purposes, ROIC will provide an analysis prepared by a licensed transportation engineer further detailing the concerns outlined in this letter. For future correspondence purposes, ROIC's mailing address is 11250 El Camino Real #200, San Diego, CA 92130. My email address is rschoebel@roireit.net.

Sincerely,

Richard Schoebel
Chief Operating Officer
Retail Opportunity Investments Corp.

Meredith Holzemer, mholzemer@mcrtrust.com

McCULLOUGH HILL PLLC

November 16, 2023

Tony Leavitt
City of Kirkland Planning and Building Department
123 5th Avenue
Kirkland WA 98033
tleavitt@kirklandwa.gov

VIA EMAIL

Re: Parking modification response letter

Dear Tony:

Thank you for sending us the comment letters regarding our requested parking modification. We wanted to respond for the record.

There are several misunderstandings stated in the letters that we wanted to address, namely the following:

- The letter from All About Cats presumes that there will be spillover parking from our project, potentially endangering cats and their owners. Our parking report, which was completed by a transportation engineer with over 30 years of experience, shows that this will not be the case. Based on the largest data set of parking ever collected in potentially the country, our parking reduction is well below parking demand (our parking reduction request is 58 stalls, while the data would support a reduction of up to 73 stalls). Thus, the relevant data shows that our project is actually overparked. Our project values neighboring businesses and looks forward to hosting many more cats in the building that can become patients of the All About Cats clinic.
- In addition to being overparked for our demand, the project is incorporating aggressive Transportation Demand Management measures related to trip reduction and parking to ensure that no spillover parking occurs. For example, the project is required to do a study after full occupancy of the building occurs to ensure that occupants are not parking off site illegally. It is a condition of the project that this study occurs, and if spillover parking is occurring, the project will be required to penalize parkers. In addition, if spillover parking continues to occur, the project will be required to find off-site parking for its residents at its own cost.
- The letter from ROIC also misunderstands the purpose of a parking modification. The parking modification is being granted precisely because the project can fully serve the parking demand generated by its building, as borne by the data provided. ROIC cites the Fehr and Peers study as potentially including a 15% level of error. What ROIC misses is the fact that the parking study included four separate data sets to show parking demand in several different contexts. All four of these parking data sets support the fact that the requested parking will be far below the actual parking demand for the project.

We appreciate the opportunity to respond to these letters. Please do not hesitate to contact me should you have any questions regarding this matter.

Sincerely,

Bridle Trails parking modification
November 16, 2023
Page 2

/s

Jessie Clawson

Tony Leavitt

From: Kathleen Lester <kathy@weareallaboutcats.com>
Sent: Wednesday, December 6, 2023 3:47 PM
To: Tony Leavitt
Subject: Permit #TRAN23-00292

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Regarding permit #TRAN23-00292

Dear Tony Leavitt,

In regards to the request by Mill Creek Residential's parking modification request, we are reiterating what we submitted previously in response to Mill Creek Residential's earlier parking modification request:

We are small business owners in the Bridle Trails Shopping Center. We urge the City of Kirkland and/or the City of Kirkland's Planning and Building Department to not approve the parking modification requested by Mill Creek Residential.

We strongly feel that the required average of 1.52 stalls per unit or 1.14 parking stalls per bedroom should remain in place. If the number of parking stalls required is reduced, then there will be inevitable spillover by apartment residents and residents' guests into the Bridle Trails Shopping Center parking lot. We have a limited number of parking stalls directly in front of our clinic; because of this, some of our clients must park further from our clinic. Increased competition for these parking stalls would mean that our employees and clients may have to park even further away from our business. This could negatively impact our business if clients decide they will longer bring their cats to us because the parking lot is too full, or is too difficult and dangerous to navigate. This parking lot is already very busy, and we have observed many drivers on a daily basis who speed through the parking lot, putting pedestrians (and for our clients, their cats) at risk.

Thank you for your consideration.

Sincerely,

Richard Lester, DVM and Owner
Kathy Lester, Practice Manager and Owner
All About Cats Veterinary Hospital

425-636-8201

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Hours: Monday-Friday, 9:00-5:00

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Modera Transportation Management Plan (TMP) Elements:

1. Provide ORCA pass or \$50 monthly subsidy towards a vanpool service for all on-site management employees of the residential building.
2. If the trip generation study, as required in the TDM measure #16, results in a PM peak hour trip generation of more than 174 trips, then the applicant shall provide a \$50 monthly subsidy towards an Orca transit pass or vanpool service to 20 tenants 18 years old or older that are on the tenant lease agreement for every one PM peak hour trip to be reduced, unless the applicant provides an equivalent trip reduction strategy that is agreeable by the City. The residents that are eligible for an Orca pass shall be required to prove that they are not receiving the same Orca pass services from their employers to receive an Orca pass. This TDM measures shall be implemented within three (3) months from the result of the trip generation study. A subsequent PM peak hour trip generation study shall be completed two years from the implementation of this TDM measure to determine its efficacy. Thereafter, the applicant shall work with the City to determine other TDM measures to ensure that the development meets its 174 PM peak hour trip threshold.
3. Unbundled parking (see Parking Management)
4. Provide secure bike storage in the garage at the same level as the garage entrance for per zoning requirement (1 space per 12 parking spaces) for residents.
 - a. The Public Works Pre-Approved Plans R-36 provides guidance to the bicycle amenities design and rack installation.
 - b. At least 10% of the bike racks shall be placed with greater clearances to accommodate oversized bicycles
 - c. At least 50% of the bike racks shall have access to electric outlets (i.e., an electric outlet shall be located within 3 ft. of the rack.
 - d. No more than 50% of the bike racks shall requiring lifting (e.g., vertical or hanging racks)
5. Provide shared 5 bicycles for residential tenant use.
6. Offer programs for bicyclists such as safety training and bicycle maintenance classes.
7. Provide a basic bicycle maintenance equipment such as a bicycle stand, electric pump, a basic bicycle maintenance kit within or near the bicycle storage area for residents' use.
8. Provide a minimum of 4 bicycle racks or as required by the Kirkland zoning code, whichever is higher, within 50 feet of the building main entrance for visitors. The bicycle racks shall be covered and highly visible to visitors. The locations of the bicycle racks shall be provided on the plans for staff review and approval. The Public Works Pre-Approved Plans R-36 and CK-R.40 provides guidance to the bicycle amenities design and rack installation.
9. Parking shall be unbundled from the lease. No more than one (1) parking space will be assigned to any residential unit with less than two bedrooms.
10. Parking charges will be \$108 per parking space or at the market rate, whichever is higher.

11. Residents must register their vehicles with the apartment manager.
12. All registered vehicles must park on site.
13. The parking policy requiring tenants to park on-site shall be included in the lease agreement. Issues fines to residents who violate parking guidelines and park off-site.
14. Mitigate spillover parking. If there are complaints from the nearby residents or businesses about spillover parking by the development, the building owner or building manager shall hire third party transportation engineer consultant to conduct a spillover parking study and develop and implement mitigation strategies to address any identified spillover parking. The scope of the study shall be submitted to the City Transportation Engineer for review and approval prior to the data collection.
15. If the measures within the TMP do not adequately mitigate spillover parking, the city may require additional measures to adequately address the spillover parking.
16. Submit the first parking utilization, vehicle ownership report, and a PM peak hour trip generation study when the building is at 90% occupancy or more or within two years the final occupancy permit, whichever comes first. The trip generation study shall include data from three (3) weekdays.
17. The on-site Property Manager is responsible for day-to-day management of the TMP and will serve as the Building Transportation Coordinator (BTC). The name, phone number, and email address of the BTC shall be forwarded to the City of Kirkland public works department.
18. Transportation Information Center (TIC). A TIC shall be provided in highly visible and accessible areas approved by the City. The TIC shall include information about nearby transit routes, stop locations, and schedules, on-site bicycle amenities, and off-site bicycle and trail facilities that connect to the site. A sign in the building lobby shall also be posted directing residents to the commuter information center for printed materials and also identifying one or more website with relevant information regarding transportation options.
19. The format and mechanism to distribute information may change over time, and could include displays, electronic kiosks, on-site staff, or alternative electronic formats such as intranet and/or smart phone applications. The information provided should be updated at least twice per year. The TIC shall display the name, telephone number, email address, and office location of the BTC. The mechanism(s) used to distribute commuter information shall be described in reports to the City.