

## Herbaugh, Melinda

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**From:** Megan Kruse <kruse.megan@gmail.com>  
**Sent:** Sunday, February 10, 2019 1:44 PM  
**To:** PRC; King, Lindsay; Zora, Sara  
**Cc:** John Sosnowy  
**Subject:** Escala Comments on Incomplete Traffic Study for #3026416  
**Attachments:** Escala Comments for #3026416 Rec Meeting .pdf; 5V Move-In\_Move-Out Truck Demand.pdf

[Megan Kruse](#)  
[m](#)

[kruse.megan@gmail.co](mailto:kruse.megan@gmail.com)

February 10, 2019

To: PRC, Lindsay King SDCl, Sara Zora, SDOT

Re: Comments on Incomplete Traffic Study for #3026416  
First Light Condominium/Offices 2000-3<sup>rd</sup> Ave. at Virginia St.

Dear Lindsay and Sara,

The original TENW Traffic Study for #3026416 at 2000-3<sup>rd</sup> Ave. and its Update of 1/3/19 (posted 1/16/19) are incomplete and misleading. The foundation of the study's projection of future traffic volumes (and cumulative impact) is completely invalid having excluded the project's *closest* tower neighbors:

#3025502 at 2033-4<sup>th</sup> Ave. Located 60 ft away on the same alley: **23-story hotel and apts with no loading berth and no parking**

#3023678 at 1927-3<sup>rd</sup> Ave. Located cross-corner on Third Ave at Virginia: **38-story mixed-residential 340 apts, 159 pkg stalls and 2-25-ft loading berths, one blocked by a column, the other with an inaccessible turn radius**

#3026266 at 2025-5<sup>th</sup> Ave. Located 1 blk away sharing Virginia and Lenora St. egress: **44-story, 480 apts, 315 pkg stalls, an undefined loading space that blocks waste and recycling storage**

#3028017 at 2005-5<sup>th</sup> Ave. Located 1 blk away sharing Virginia and Lenora St. egress: **44-story, 440 apts. 292 pkg stalls, 2 loading berths, one dually labeled for trash and recycling. Turn radius inadequate to the 16' alley (project incorporates landmarks, no setback required)**

#3023025 at 1915-3<sup>rd</sup> Ave. Located ½ block away on Third Ave. sharing Virginia St. egress: **currently 14-story hotel/apts with no loading berth (waiver requested). Property recently sold to Bergman Luggage bldg. owners. Plan for that block could grow exponentially.**

**Beside these major omissions, TENW's 1/3/19 Responses to the City's Correction Transportation Notice #1 and #2 are incomplete and contain assumptions not supported by data. Following are Escala's comments on each TENW Correction response:**

### **TENW's Response to Correction Comment #1: Parking Supply and Demand**

**Escala Comment: Parking demand appears to be greater than the amount of parking provided (441 stalls).** The Update's Attachment B shows owner demand at 395 parking stalls but only 334 are dedicated to residential use. Twenty-five "flex" stalls can be used for residential or commercial. Using all flex stalls for residential provides 359 residential spaces--shorting residential demand by 36 stalls. It also leaves just 82 spaces for restaurant/office/retail use where the daytime peak demand is 103 spaces with an average of 92 spaces required from 8 a.m. to 6 pm.

The study questionably assumes an average of 239 residents will commute by car or otherwise move their vehicles from the garage daily between 8 a.m. to 6 pm. What supports that assumption? The assumption is contradicted by TENW's answer to Correction Comment #5 that says "*Consistent with other residential projects in the area, it **is assumed** that any residential trips within the downtown core would be made by non-vehicular mode of travel.*"

Parking demand will likely exceed availability for tower residents and 600 office/restaurant/retail tenants as well as the project's neighbors who relied on the previous 65-car surface lot. TENW needs to answer the correction notice question: "How/where will this excess demand for parking will be accommodated and how will this affect overall parking conditions in the downtown core?"

#### **TENW's Response to Correction Comment #2: Displaced Parking Impacts**

**Escala Comment:** The project is fortunate to have one small remaining surface parking lot on the block to serve its five project neighbors, none of which have parking and will rely on this lot or the alley to accommodate service trucks for deliveries, moving and repairs.

The project will also need that small lot. Like most of Seattle's parking garages, First Light's garage ceiling height won't accept common trucks and vans used for repairs, remodels and maintenance.

The occupancy estimate for the former surface parking lot appears low. Losing 65 open air spaces will be a blow to surrounding older buildings on that block and beyond. Speaking from personal experience, residents of older buildings with no parking are regularly told by vendors who won't come downtown it's because they can't find parking that will accommodate their trucks.

#### **TENW's Response to Correction Comment #3: Detail Loading Operations/Alley Impacts**

**Escala Comment:** TENW doesn't answer questions on the frequency and type of commercial deliveries and residential move-ins/outs. It doesn't identify the substantial impacts on the adjacent street/alley network. It inaccurately claims the project has three loading berths when it only has two. The alley width and berth configuration are not accessible to trucks. The 25' berths are smaller than required by code and won't fit most trucks. The proposed solution of micro-scheduling moving and deliveries is unenforceable and based on being able to predict all traffic conditions. A schedule is also useless if not coordinated with activities at neighboring buildings.

At the Oct. 16, 2018 Rec Meeting, Escala presented the attached detailed study of the issues with the project's functional design for waste facilities and loading (pp. 3, 8, 11). Public comment that night moved the project architect to say he would like to work toward a better functional design. The developer's attorney sitting nearby quickly discouraged that offer.

Escala's report attached here illustrates the loading issues that need to be addressed. It is especially critical because a hotel tower (#3025502) is proposed just 60' away on the same alley.

In addition to the Oct. 16 Rec Meeting package Escala has found data to better estimate the demands of residential towers for package deliveries and move in/outs. This project will have even greater demands because of its significant office/restaurant/retail space.

**--Package Deliveries.** A 2017 Hofstra University Study every apartment/condo unit generates 1.5 e-commerce parcel deliveries a week with volume expected to grow 15% annually. For upper end dwellings, that ratio is likely higher. Using the minimum ratio this project can expect 689 residential parcel deliveries a week or up to 137 a day since most package deliveries occur Mon-Fri. *This estimate is residential only* and separate from the demands for the tower's office, restaurant and commercial deliveries and truck visits for maintenance and repair.

**--Residential Moves.** Condo turnover is less than apartments, however First Light is being heavily marketed to overseas investors so it's likely to have a high average of units as rentals. Attached is a moving frequency estimate by The Tilghman Group for two mixed-use apartment towers near the project. Even by cutting that moving rate by half, the regular number of moving trucks unable to access or fit First Light's loading berths will upend neighborhood deliveries by blocking the project's one-lane alley.

#### **TENW's Response to Correction Comment #4 Future Non-Motorized Facilities**

**No Comment**

#### **TENW's Response to Correction Comment #5 Project Trip Distribution-Residential**

**Escala Question:** What data is TENW referring to when it states, "*Consistent with other residential projects in the area, it is **assumed** that any residential trips within the downtown core would be made by non-vehicular mode of travel.*"

Thank you for your consideration of these points.

Sincerely,

Megan Kruse

On behalf of Escala

To: Nathan Torgelson, Director SDCI

Cc: Lindsay King, Planner SDCI  
Downtown Design Review Board  
Council Member Rob Johnson  
Council Member Mike O'Brien  
Council Member Sally Bagshaw

Fr: Escala Owners Association

Re: Too Big To Fail: Comments for the Recommendation Meeting on  
Project #3026416, 2000-3<sup>rd</sup> Ave.

Dear Director Torgelson,

We appreciate another opportunity to comment on 2000-3<sup>rd</sup> Avenue, specifically its functional design. As this tower moves through design review it has lost one of its three berths and the two remaining are 25' deep, not 35' as required by SMC 23.54.035 Table A. The project's site conditions make this a baffling move.

The City's own research says downtown package deliveries will double in four years. As future home to over 1,600 office workers and condo dwellers, 2000-3<sup>rd</sup> can expect several hundred package deliveries a day in addition to moving and maintenance calls. Yet it's being planned without infrastructure to meet even current demands.

Following are annotated drawings of the tower's functional design and photos of the alley right-of-way it shares with five other buildings including a proposed 23-story hotel tower just 60' to the north. The information was gathered on several visits. Among the red flags:

***--Approximately 95 feet of dumpsters and trash bins line both sides of the alley, shrinking its effective width from 18' to 12.5', 13.5', and 14' at various points. An average truck is 8' wide.***

***--No building on the block has external trash niches and 2000-3<sup>rd</sup> isn't planned with one. On garbage day its dumpsters will also line the alley.***

***--The project is opposite a popular restaurant in an historic building that receives frequent deliveries but has no loading facilities. Even when a truck parks close to its wall, 2-way traffic is often impeded by other vehicles forcing trucks to back out of the alley the way they came.***

***--By code, the proposed 23-story hotel on the alley 60' away requires 3 loading berths but its current design shows only a small 20' niche where trucks are "intended to extend only half-way into the alley."***

At this stage of Design Review, 2000-3<sup>rd</sup> Ave. has not responded to its physical environment, neighborhood context or numerous city codes. What happens when the tower is built and generating 1,310 car trips per day with moving, freight and food trucks competing for two berths that are inaccessible and too shallow to hold them?

During an alley visit I met a woman in a pick up truck from outside the city core who delivers food to Angeline's once a week. She and her young helper were stressed when they were blocked and forced to back her small truck 180' down the alley past people and fixed obstacles onto Lenora St. How will this tower's new residents cope with these maneuvers? How will cyclists entering the bike room avoid collisions in this tight space? What kind of access will police and aid cars have?

It's sometimes easy to forget that design guidelines and codes are meant to protect people and keep our city and its right-of-ways functioning for all. Simply put, towers like 2000-3<sup>rd</sup> are too big to fail.

Escala has observed these same issues in tower designs throughout the downtown core. We offer the attached **Turn Radius and Berth Access Study** that shows necessary alley widths and berth configurations to allow access for the most common van and truck serving downtown Seattle. Spoiler alert: the berth design for 2000-3<sup>rd</sup> Ave. has access problems.

The design for 2000-3<sup>rd</sup> Ave is quickly reaching the point of no return. Its inadequate loading and waste storage issues relate to the tower's height, bulk and scale and its proximity to smaller, historic buildings built without internal loading and waste storage facilities. The bottom of Exhibit 2 in this package cites development guidelines that call for these inequities to be analyzed and mitigated before the project leaves Design Review. Once it passes this phase its design is considered to have contained these impacts.

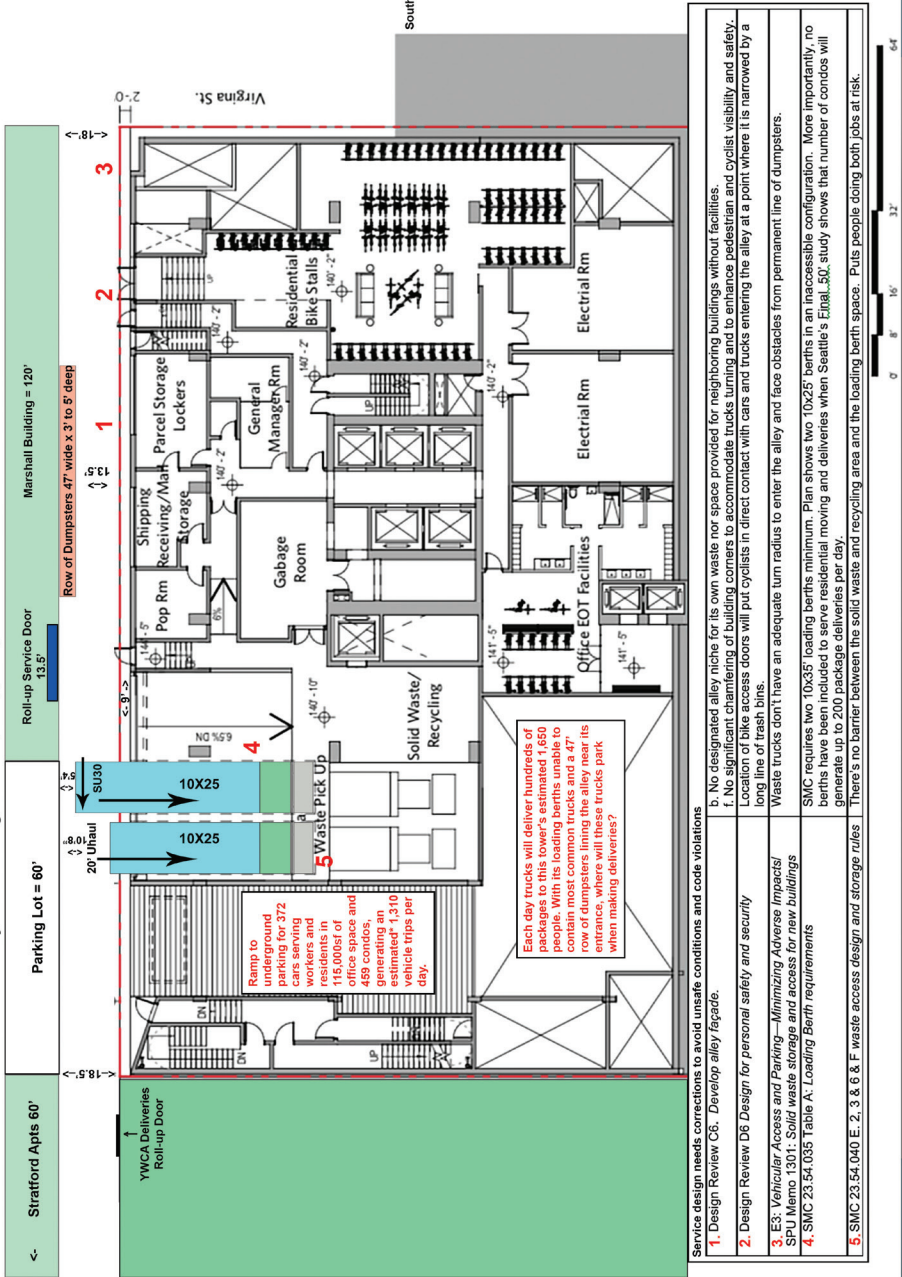
Similar site conditions and functional design flaws are being repeated in proposed towers in the blocks surrounding 2000-3<sup>rd</sup> Ave. We ask SDCl with the help of the city council to act now before it's too late. The city is being remade in this construction boom and unless we provide the necessary infrastructure for the next century this generation of city stewards will be seen to have failed.

Sincerely,

Megan Kruse  
On behalf of Escala

EXHIBIT 1

- 2000-3rd Avenue's alley width and the size and design of its loading berths won't allow access and containment of most delivery and moving trucks. (See appendix)

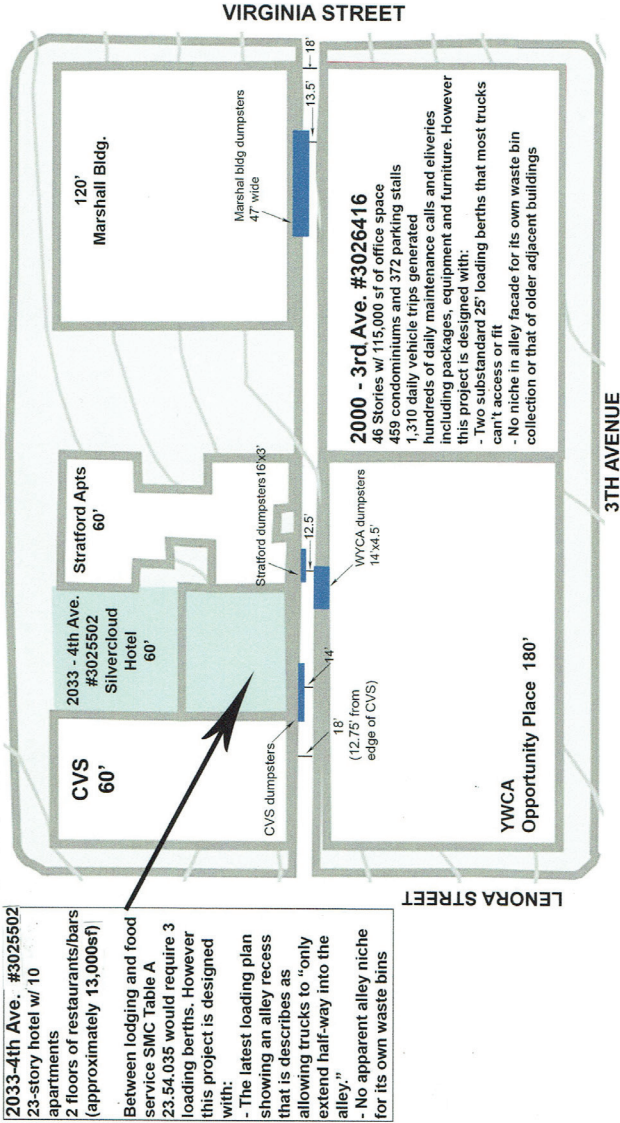




## EXHIBIT 2

--Approx. 95' of waste receptacles line both sides of the alley shrinking its effective width by 3-5'

--Project alley gridlock will disrupt basic services and compound congestion on surrounding streets



The Downtown Design Guidelines in B2 b. c. d. and e. address the authority of the Design Review Process to analyze and mitigate adverse impacts when a new development threatens adjacent buildings in a less intensive zone.

This project block is within the same land use zone but it is drastically divided in height, bulk, scale, and intensity of use by buildings on the east and west side of the block. The east side of the block is dominated by historic buildings, housing, successful restaurants, businesses, and a residence - all built in the early 1900's with no internal loading or waste facilities.

The new towers proposed for this block have failed to design adequate facilities to meet their large impacts. If new buildings don't provide space for their own loading and waste collection, the alley won't function. Page 16 of the Downtown Development Guidelines gives the DRB authority over this issue stating, "the analysis and mitigation of height, bulk, and scale impacts will be accomplished through the design review process."

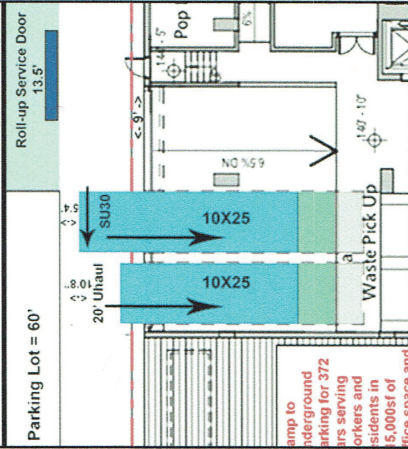
## EXHIBIT 3

- Site conditions block truck movement in this crowded 2-tower alley (A-1)
- The towers' designs for loading and waste collection are inadequate and guarantee alley dysfunction and unsafe conditions (C-6, D-6, E-3)

#3026416 2000-3rd Ave.  
117,000 sf of office space  
459 condos and 444 parking stalls  
1,310 daily vehicle trips generated

**Code requires two 10 x 35 loading berths for offices but plan shows only 10 x 25 berths.**

**Plan rejects need for more loading space to serve 1,000 condo residents' demand for moving, maintenance, and package deliveries.**



Page 31 of Silver Cloud's latest plan states "design intends for trucks to be able to back in and extend less than halfway into the alley right-of-way while loading." Dumpsters across the alley at the YWCA and next door at Stratford Apts. make this low bar unattainable.

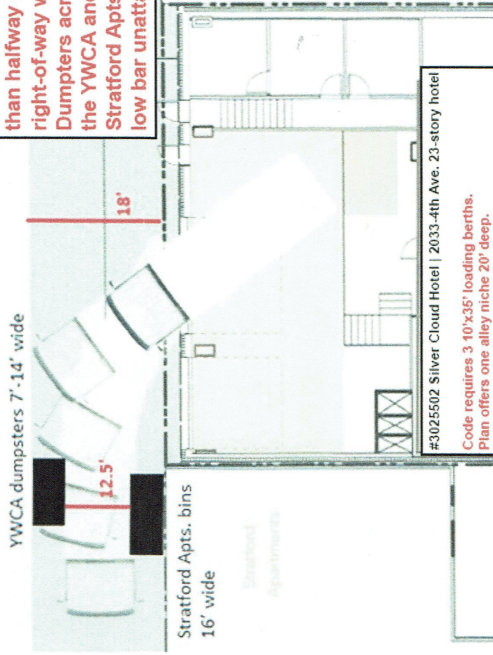
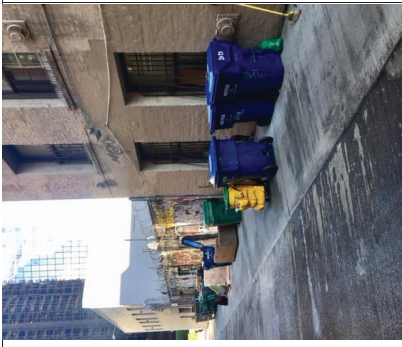


DIAGRAM OF TURNING RADIUS AT LOADING



**Exhibit 4**

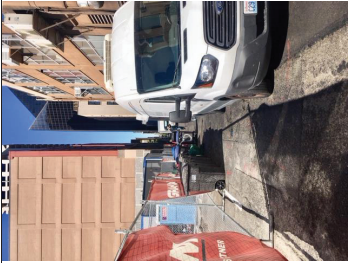
Scenes from the project alley for #3026416 and #3025502.  
These dumpsters have nowhere else to go.



47' line of bins from the Marshall Building



14' line of dumpsters outside YWCA



Line of bins, furniture and garbage from Stratford and CVS

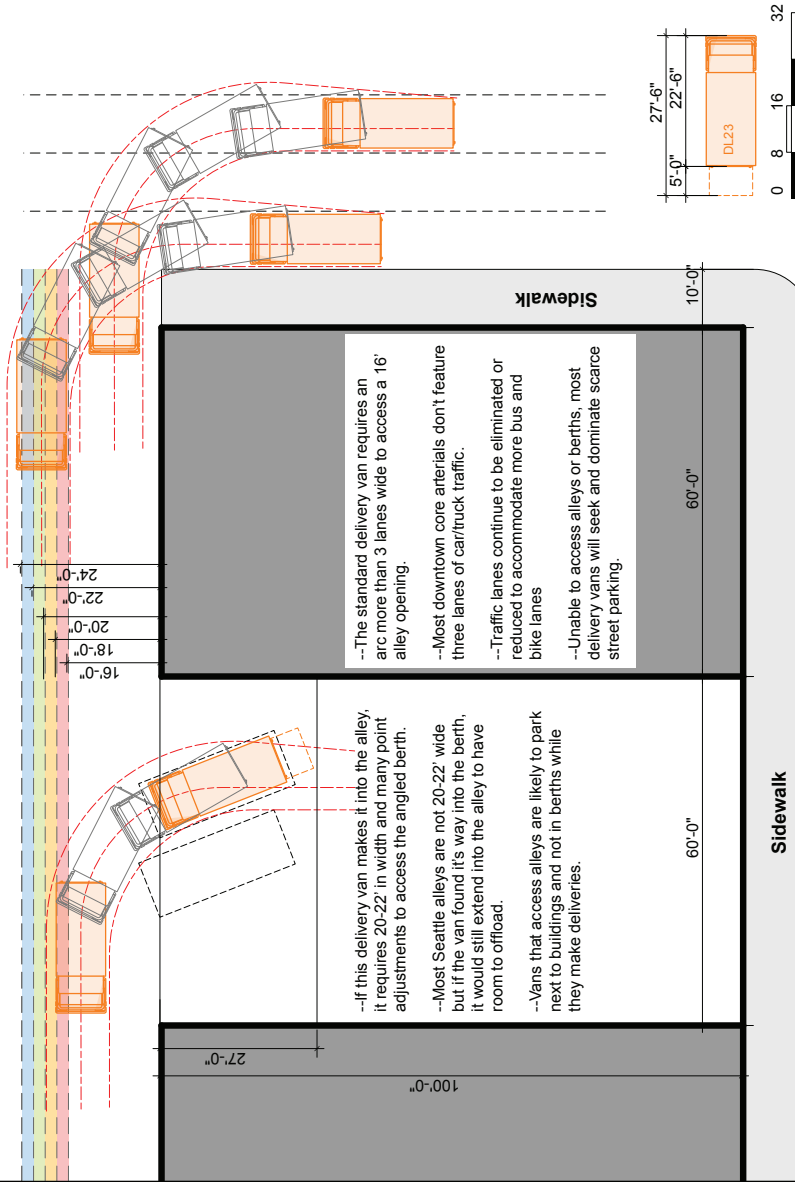


Just one truck blocking alley caused this pick up to back 180' out of the project alley

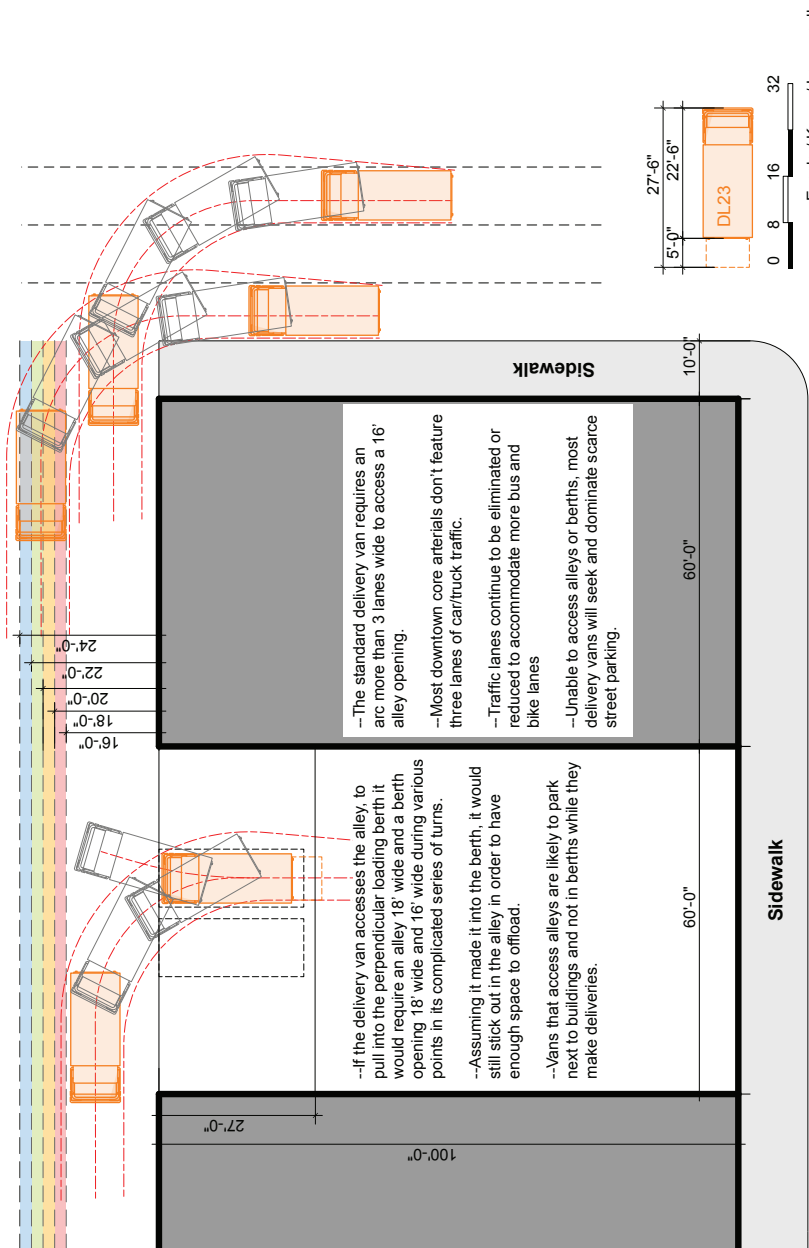


Project alley looking south

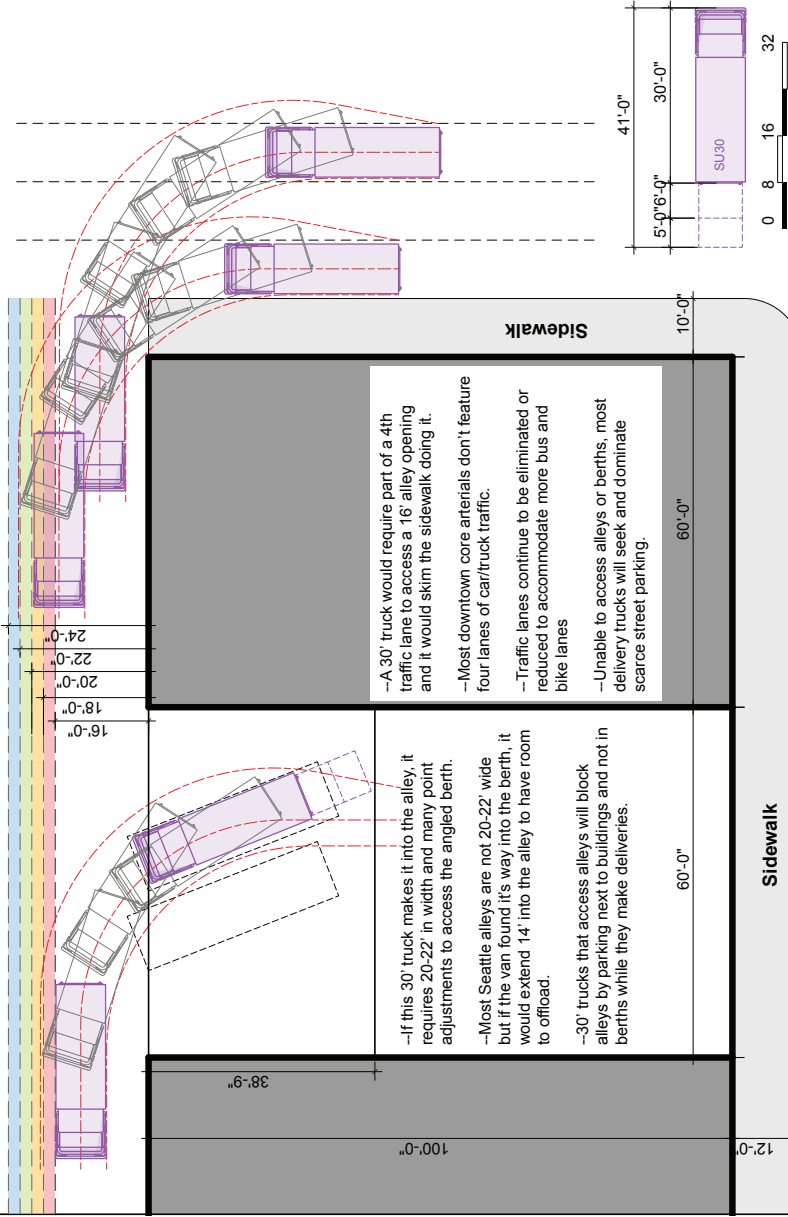
## Standard delivery van's ability to access alleys and fit in a 25' angled loading berth



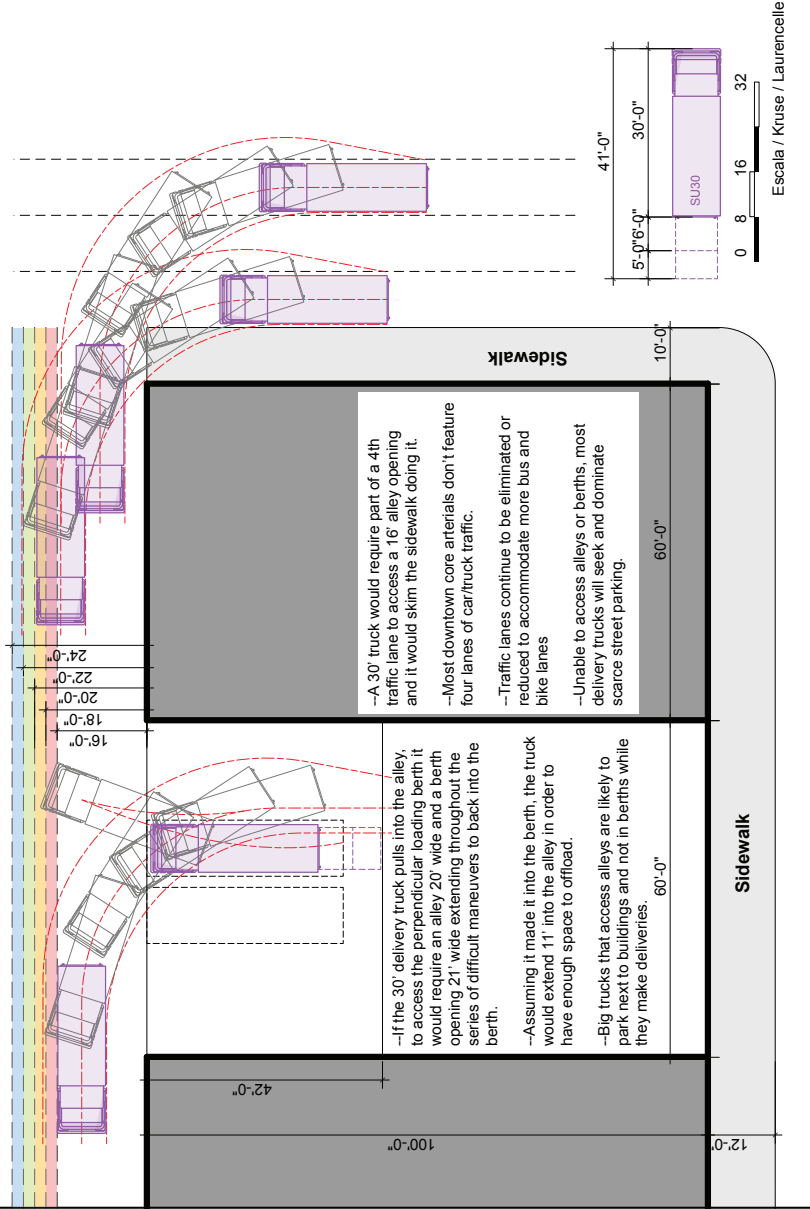
Standard delivery van's ability to access alleys and fit in a 25' perpendicular loading berth



Standard 30' delivery truck's ability to access alleys and fit in a 35' angled loading berth



Standard 30' delivery truck's ability to access alleys and fit in a 35' perpendicular loading berth





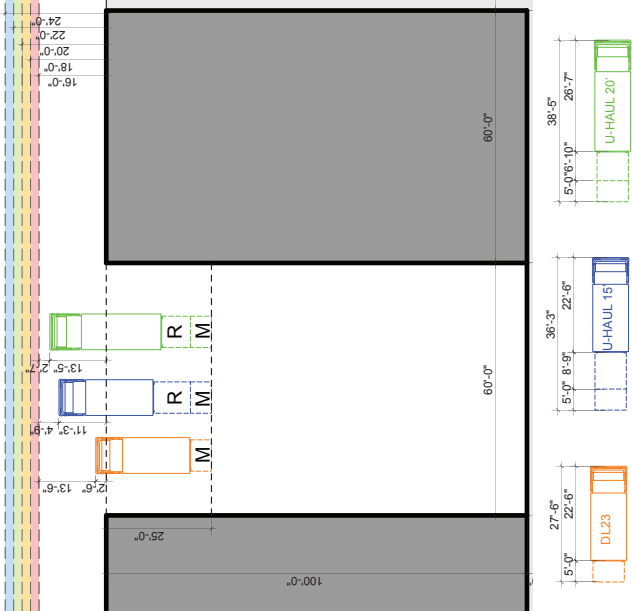
*Even if access wasn't an issue...*

**Most common trucks are longer than their intended berths**

They also extend into alleys because they require ramps or lift gates plus maneuvering room to offload.

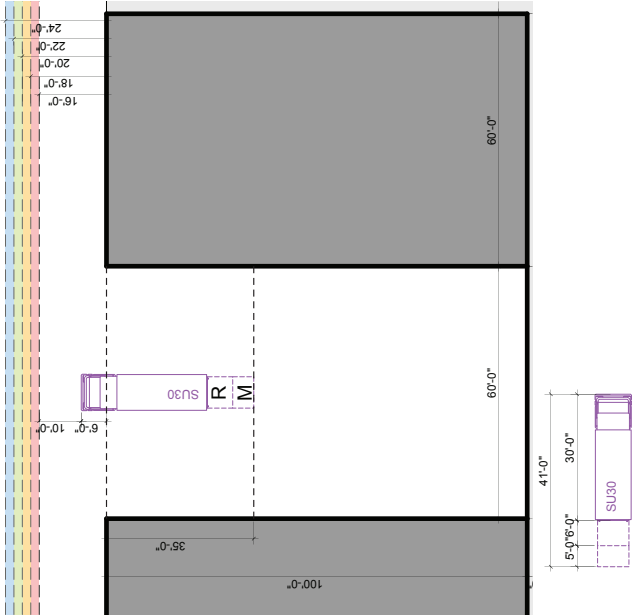
TRUCKS INTENDED FOR 25' BERTHS

R= ramps or lift gates  
M= maneuvering space



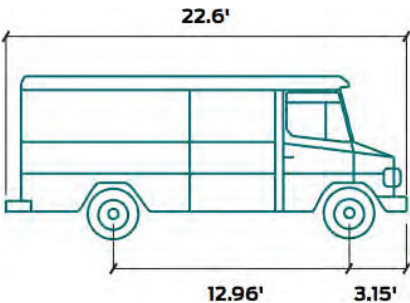
TRUCKS INTENDED FOR 35' BERTHS

R= ramps or lift gates  
M= maneuvering space



# Appendix: Common Trucks Serving Downtown Seattle

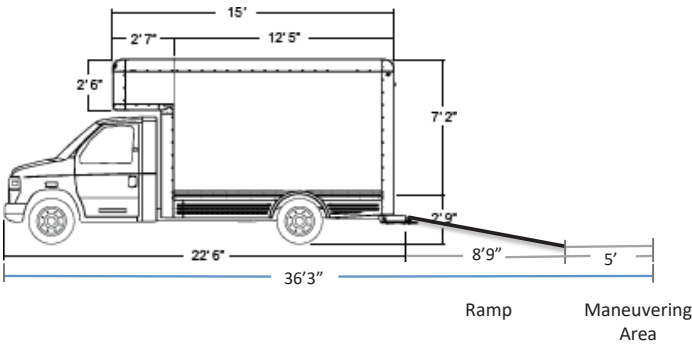
## Trucks Using 25' Loading Berths DL-23



Source: NACTO

Truck Length:	22'6"
Add 5' for maneuvering room	5'0"
<b>Total Length</b>	<b>27'6"</b>
Berth Length	25'0"
<b>Truck Extends beyond Berth by</b>	<b>2'6"</b>

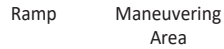
## U-Haul 15' Truck



Source: UHaul; Tilghman Group

Truck Length:	22'6"
Ramp	8'9"
Add 5' for maneuvering room	5'0"
<b>Total Length</b>	<b>36'3"</b>
Berth Length	25'0"
<b>Truck Extends beyond Berth by</b>	<b>11'3"</b>

### U-Haul 20' Truck



Source: UHaul; Tilghman Group

Truck Length:	26'7"
Ramp	6'10"
Add 5' for maneuvering room	5'0"
<b>Total Length</b>	<b>38'5"</b>
<u>Berth Length</u>	<u>25'0"</u>
<b>Truck Extends beyond Berth by</b>	<b>13'5"</b>

# Trucks Using 35' Loading Berths

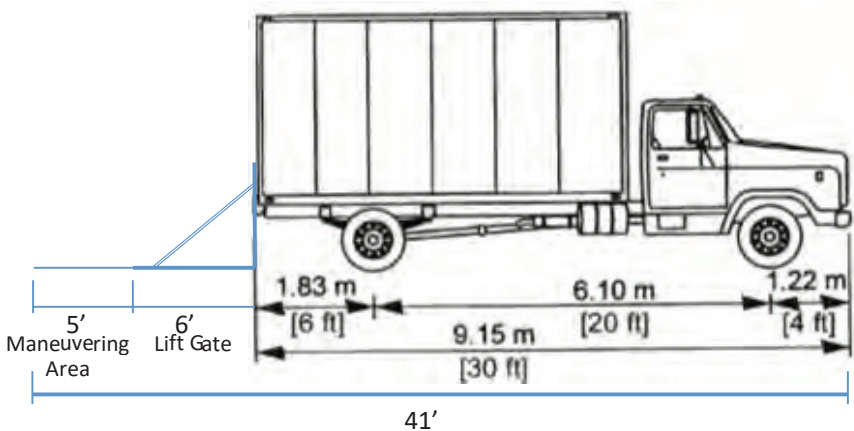
## SU-30



Beverage Delivery Truck



Costco Delivery Truck

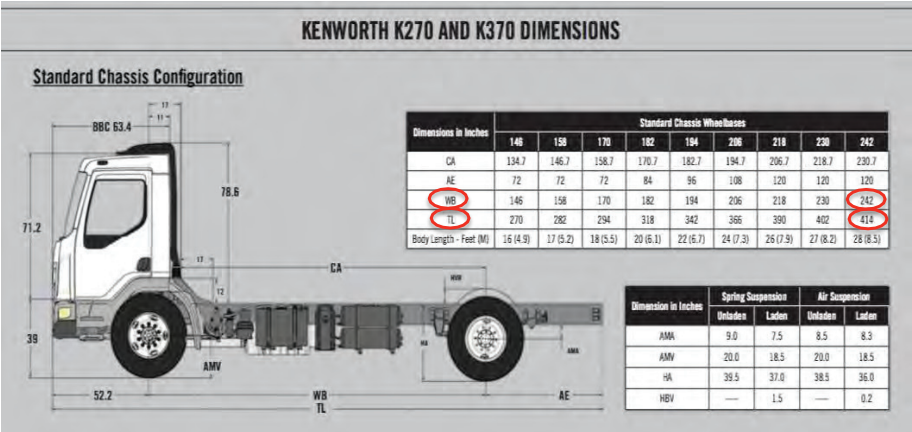


Source: AASHTO; Tilghman Group

Truck Length:	30'
Lift Gate	6'
Add 5' for maneuvering room	5'
<b>Total Length</b>	<b>41'</b>
<u>Berth Length</u>	<u>35'</u>
<b>Truck Extends beyond Berth by</b>	<b>6'</b>

### Trucks Using 35’ Loading Berths

SU-30 reflects a 20’ wheelbase, but trucks can be longer than 30’ even with that wheelbase or less:

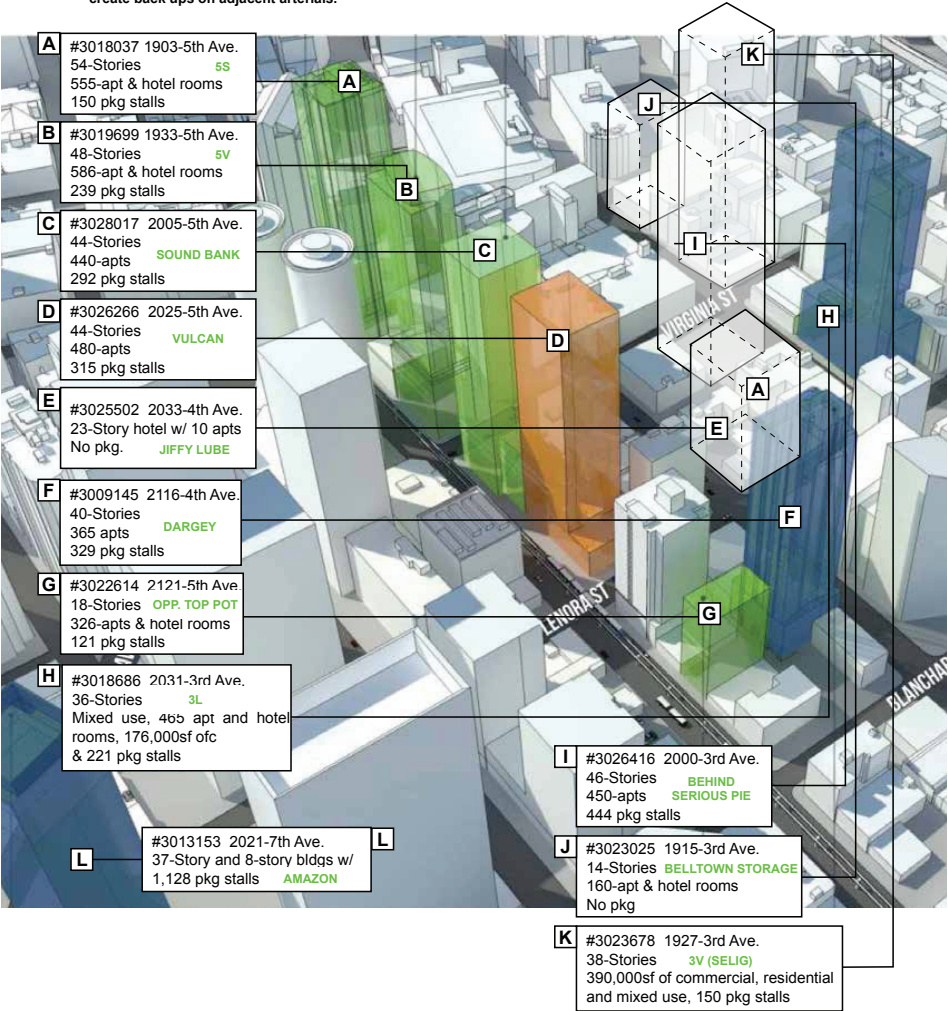


- With a 18’ wheelbase, truck length can be 32’6”. With a lift-gate and maneuvering room, total length is 43’6”.
- This example also shows that with a 20’2” wheelbase, the overall length is 34’6”. Adding the space needed for a lift-gate and maneuvering room, the total working length would be 45’6”.



**Cumulative Impact: New towers with mandatory alley access (A-K)**

- Behind these mega towers narrow 16' to 18" alleys will do the work of arterials carrying thousands of trucks and cars to serve over 10,000 new residents, hotel guests, restaurants, retailers and office workers.
- If new buildings aren't designed to receive deliveries within their own walls, these alleys will lose their function and become parking lots that create back ups on adjacent arterials.



### Estimation of Move-in/Move-out Truck Trips

Residential Units								
5th & Virginia	437							
5th & Stewart	256							
TOTAL	693							
Occupancy	95%							
Occupied Units	658							
Assumed Annual Turnover %	50%							
Annual Turnover - Units	329							
Average Monthly Units	27							
		<i>Trucks Parked</i>				<i>Truck Trips</i>		
		Move-Out	Move-In	Trucks Parking	Daily Average Trucks	Trips per Truck	Moving Truck Trips	Daily Average Trips
Assumed % in Highest Week:	50%							
Units	14	14	14	27	4	2	55	8
Assumed % in Highest 3 days:	30%							
Units	8	8	8	16	5	2	33	11

Estimated Duration per Truck:	2.0 hours
Average Daily Truck-Hours During Highest Week:	7.8 hours
Average Daily Truck-Hours During Highest 3 days:	11.0 hours