



MEMORANDUM

08 December 2023

To: Carly Guillory, Seattle Department of Construction & Inspections
From: Rebecca Hutchinson, Mahlum Architects

RE: Parking Departure Correction Response

We are responding to your August 31, 2023, correction, which states:

The Hearing Examiner Findings and Decision report dated August 10, 2023, granted the appellants' appeal regarding Departure 2 (parking) and upheld the remaining requested departures in the Department's decision. Please revise the project proposal to include the required parking or provide additional information to supplement a revised decision. SDCI will send an additional correction letter if more information is required from your applicant team.

As noted in the correction, the Hearing Examiner remanded SDCI's Parking Departure Decision back to SDCI for further consideration consistent with the Examiner's decision. All other departures were upheld. The Examiner requested that the parking issue "be revisited, with further thought given to how to improve the balance between school needs against the parking and circulation challenges the area faces." Decision, p. 9.

The proposed Alki Elementary School project is a 502-student capacity school with an additional capacity for 40 students in developmental early learning on a 1.4 acre site. The Alki school site is the smallest elementary school site in the district and was approved in the BEX V levy to be replaced. Indeed, the footprint of the proposed new building is 29,000 s.f., which is very similar to the footprint of the former Alki Elementary School building that it is replacing (27,300 s.f.). The site also supports a 6,000 s.f. gymnasium and 6,000 s.f. community center operated by Seattle Parks and Recreation, both to remain. The first floor of the proposed new building includes the following elements: administrative suite, health clinic, preschool classrooms, kindergarten classrooms, dining commons and kitchen, music room and stage, gymnasium, custodial and receiving, and main mechanical and electrical rooms. To best serve the student population and for proper functioning of the school, each of these elements must be located on the first floor. Each is explained below and supported by the illustrations on pages 8 and 9.

Administrative office space must be located on the first floor with eyes on the entrance for safety and security considerations and to welcome students, staff, families, and visitors to the building. Kindergarten and early learning facilities must also be located on the first floor as it is critical that these younger students have a quick egress point in the event of an emergency and do not have to utilize stairs with older kids. The kitchen and dining commons must be located adjacent to the delivery truck zone and building receiving area to bring fresh food to the students daily. The music room and stage must locate adjacent to the dining commons to support school gatherings and performances. The building's main mechanical and electrical rooms are required to be located on the ground floor to meet building code requirements. And the gym at Alki is an existing structure located on grade at the far east end of the site. In other words, no

matter the student capacity of the replacement school, the footprint of the new school building is effectively set and cannot be reduced significantly to provide code-required parking. This is similar to the fact that the City's Land Use Code requirement for on-site parking is also not based on student capacity of the school or need, but rather the size of common areas and event spaces.

Additional Parking Study

The School District completed a parking study in December 2021 as part of the overall transportation technical analyses prepared in support of the SEPA Checklist for the project. The study conducted for the project showed existing on-street parking occupancy about 50-58% utilized, and estimated occupancy could increase to 64-73% utilized at build-out with full enrollment of the proposed school. Transportation Technical Report Study, pp. 17 and 26. Appellants raised concerns that the parking study was conducted during the COVID-19 pandemic, during the West Seattle Bridge closure, and during less popular months at Alki Beach. Mr. Tod McBryan of Heffron Transportation explained that Heffron reviewed Google Earth images in May from years prior to COVID and the bridge closure. Based on this analysis, Heffron confirmed that the December 2021 daytime parking counts are generally similar to the daytime counts from warmer months prior to the pandemic. This similarity is in part because, as the study noted (and Mr. McBryan reiterated at the hearing), the December 2021 parking counts were likely conservative at the time as more people were working from home and accordingly not leaving street parking spots during working hours. Despite this information, the Hearing Examiner found that "[t]he parking analysis was completed during an extraordinary time-period that does not reflect current or expected conditions." Hearing Examiner Decision, p. 10. While SPS agrees that the parking count was conducted during an extraordinary time period, it does not agree the December 2021 counts did not reflect current or expected conditions for daytime parking at and around Alki Elementary School.

Nevertheless, in light of the Examiner's Decision, SPS requested that Heffron conduct additional parking analysis commensurate with the Decision.

In response to this request, Heffron Transportation, Inc. conducted additional on-street parking observations during August and September 2023. A new 2023 Updated Parking Analysis (November 2023) presents new data and analyses to supplement data and analyses presented previously in the referenced Transportation Technical Report for the Alki Elementary School Addition and Renovation. The new parking observations reflect summertime (August) and early school-year (September) conditions with the West Seattle High-Rise Bridge open and operating normally and normalized post-pandemic conditions with many employees returned to office. It is acknowledged that Alki Elementary School was not occupied during the new observations as its students and staff were relocated to the Schmitz Park School site for the interim construction period. The new parking study included surveys at the Schmitz Park site in order to estimate demand from the school staff and visitors that may park at or near the Alki site when the school reopens there.

Weekday occupancy counts were performed during early morning (between 7:00 and 7:45 A.M.), the time when staff would typically begin to arrive at the school, and mid-morning (between 10:30 and 11:15 A.M.), the time when school-day parking is typically highest. For the August/September 2023 counts, a mid-afternoon count period (between 2:00 and 2:45 P.M.) was added to address community concerns about parking availability during school dismissal periods. Evening counts were performed (between 7:30 and 8:15 P.M.) when school events could occur.

The 2023 surveys found that parking occupancy on school weekdays—early morning and mid-morning—were nearly identical to occupancy counts during the same time periods in December 2021. Weekday

afternoon occupancy was nearly identical to the mid-morning occupancy. The utilization percentages were slightly higher in September 2023—ranging from 51% to 58%—because the on-street supply was slightly reduced by temporary construction-related restrictions along the west side of 59th Avenue SW just south of SW Stevens Street. Unused parking averaged between 156 and 172 spaces across the six school-day observations during three time periods.

The new studies show that parking occupancy in the area around the Alki Elementary School site is very similar during early-morning and mid-morning time periods in August and September. During the evening period, the August and September counts were higher than the daytime counts and higher than the evening counts from December 2021. This is as expected and as stated in the referenced prior report: “Increased recreational parking demand tends to increase in the later afternoon and early evening beginning in spring as the weather warms and continues through summer into early fall.”

Based on this analysis, the December 2021 parking study, which demonstrated that there is sufficient on-street parking to accommodate a parking departure that reduces the required parking from 48 stalls to zero stalls, remains accurate under current and future predictions.

Parking Structure

The Hearing Examiner’s decision also opined as to whether a parking garage is an option. A parking structure is not feasible on this site for multiple reasons. First, and most critically, is the operational and security aspects of a parking structure under an elementary school. It is difficult to consistently secure structured parking, even with a gate, and such parking would increase the potential for uninvited persons to utilize the parking structure for a multitude of nefarious reasons. SPS does not want to put its students and staff at risk. Secondly, the parking structure cannot be an above-grade structure, as it would greatly increase the height of the building—an issue that was of concern to many neighbors. A below-grade structure is also not feasible for several reasons. First, due to the high water table, a bathtub-style structure would likely be needed, which would require a significant amount of dewatering. The amount of dewatering could potentially impact the neighboring properties because of settlement. Second, the required geometry of a garage entry would require removal of critical ground floor programming, likely the Early Learning classrooms and support areas, to accommodate the garage entry. Finally, a garage is cost-prohibitive and would likely cost the City of Seattle taxpayers at least \$10 million. A question of whether below-grade parking was feasible at an elementary school was raised in the Northgate Elementary Departures appeal as well. There, in Conclusion of Law 2.3, the Examiner found that, “[d]ue to safety and security concerns, underground parking was not proposed. This was also a cost issue. The Appellants argued cost was not a consideration under the code criteria. The Examiner makes no determination on this point, though there is no code provision stating cost cannot be considered in assessing feasibility and departure need.” [cite, p. 7].

Condemnation of Adjacent Homes

The Hearing Examiner noted that “while [SPS] prefers not to acquire local residences for the school, it did not detail why land acquisition is otherwise infeasible.” Hearing Examiner decision, p. 4. To be clear, SPS does not want to condemn homes to provide parking. Indeed, the stated purpose of the SMC Chapter 23.79 is to allow departures to avoid demolition of residential structures. SMC 23.79.002. Indeed, if SPS had proposed demolition of residential structures without seeking a development standard departure, the Code requires the Director of SDCI to initiate the departures process and SPS would be bound by the departures decision necessary to reduce the demolition of residential structures. SMC 23.79.002.B.

Nevertheless, based on the Hearing Examiner's decision, SPS analyzed the parcel adjacent to the southern property line of the project site which includes a 16-unit apartment building. This parcel would have the potential to provide 30 stalls but will also require retaining walls at the steep slope in the corner of the site and approval from SDCI Geotech to construct within an Environmentally Critical Area steep slope and steep slope buffer and would still not provide 48 stalls. This approach would also displace 16 families and be cost-prohibitive to obtain.

Because acquiring the parcel to the south is not feasible, SPS also analyzed the potential for purchase or condemnation of the two parcels immediately to the east of the school site, which include single family homes. Purchasing or condemning these two parcels would result in less displacement compared to the condemnation of the southern parcels. Indeed, SPS had appraisals completed for these two parcels in preparation of potentially providing an offer to the owners for purchase. Condemnation of the two parcels to the east could yield approximately 20 stalls. The creation of parking on these sites, however, would require significant retaining walls at the steep slope and approval from SDCI Geotech to construct within an Environmentally Critical Area steep slope and steep slope buffer and would still not provide 48 stalls. This option also does not appear to be a desirable or viable option based on the site constraints and difficulty of development.

Site Redesign Considerations

Because providing a parking garage or acquiring residential parcels proved to be infeasible, SPS reviewed possible site redesign options. Upon the Hearing Examiner's remand to SDCI, the SPS design team explored several options to provide some parking on-site. Based on the small site size and the necessary footprint of the building to accommodate the educational needs of the student population, discussed in more detail above, there were limited options for providing on-site parking outside of removing critical educational programming. As each element of the school is necessary to accomplish the educational goals of SPS, the team explored how to retain only the critical elements of the school while reconfiguring or removing features that are important and desired, but not critical to the functioning of the school. As you can see on pages 11 and 12, the prior site design had a larger loading with dedicated entry and additional storage. As shown on pages 13 and 14, the design team was able to remove the loading platform and a dedicated driveway and staging area for SPS delivery trucks and garbage pickup. The design team also relocated the proposed transformer further away from the school building, which adds a greater cost than the original design. The design team then removed some storage space from the school and reconfigured the long-term bike parking structure (while still retaining the same number of long-term bike parking stalls). Finally, the design team removed the dedicated pedestrian path at the south edge of the site. This redesign sacrificed those elements that are desired for the functioning of the school, such as better loading, storage, and separated pedestrian path and left only those architectural elements that were necessary to meet educational goals.

The result is that SPS was able to redesign the school to accommodate 15 parking stalls, including one ADA van stall. Depending on the needs of the student and staff population at the time the school reopens, it is possible that SPS can include one additional ADA stall and/or a time-limited load or unload zone. Now that the ADA stall can be included on the school site, the previously proposed on-street ADA stall across the street has been removed, which will result in retaining one additional on-street parking stall.

In addition, the proposed number of stalls at Alki Elementary falls well within the normal for an elementary school in Seattle. Indeed, seven elementary schools (Green Lake, Laurelhurst, Loyal Heights, Madrona, McGilvra, Whittier, and soon Montlake) do not have any on-site parking. Twelve additional elementary

schools have less than 15 on-site stalls, and six additional schools have 20 or fewer on-site stalls. This data is displayed on page 15.

As part of the previously referenced 2023 Updated Parking Analysis Heffron Transportation also performed new parking observations at Alki Elementary School's current interim location—Schmitz Park School located at 5000 SW Spokane Street. The parking observations were performed on Thursday, October 5, 2023 at four times (7:10 A.M., 10:00 A.M., 2:00 P.M., and 3:15 P.M.) to reflect on-site and on-street conditions before, during, and after school. Based on the new parking observations, Alki Elementary School generates parking demand at a rate of 0.88 vehicles per employee. SPS estimates the proposed school with 542 students could have up to 65 to 75 total employees. Based on this range of possible staffing, the school could generate peak school-day parking demand of 57 to 66 vehicles mid-morning and mid-afternoon. With 15 on-site parking stalls, 42 to 51 school-generated vehicles could park on neighborhood streets, which could increase on-street parking occupancy to between 63% and 65% (125 to 134 unused spaces), below the City's target threshold of 85%. These occupancy levels would be comparable to utilization expected near other Seattle School sites such as Montlake Elementary School with its recently approved expansion with no on-site parking.

Along the east side of 59th Avenue SW, parking is prohibited, but school bus and automobile-related school load/unload are permitted during peak periods on school days. These conditions would not substantially change with project; however, in coordination with Seattle Department of Transportation (SDOT), the school load zone adjacent to Alki Playground and Whale Tail Park may be extended northward to add school load/unload capacity. The primary student load/unload operation would not occur on-site regardless of the size of the staff parking lot. The unused on-street parking surrounding the site expected to remain in the morning before school and in the afternoon at dismissal (125 to 134 stalls) combined with the designated load/unload areas would be adequate to serve the proposed Alki Elementary School.

Sincerely,



Rebecca Hutchinson AIA
Mahlum

cc Richard Best, Seattle Public Schools
Vince Gonzales, Seattle Public Schools
Brian Fabella, Seattle Public Schools
David Mount AIA, Mahlum
Laura Poulin AIA, Mahlum

encl *Revised Departure Exhibits*, by Mahlum Architects

Correction Response: Vehicular Parking Departure

CODE SECTION

SMC 23.51B.002 - PUBLIC SCHOOLS IN RESIDENTIAL ZONES
 SMC 23.51B.002.G - PARKING QUANTITY

PARKING QUANTITY. PARKING QUANTITY SHALL BE REQUIRED AS PROVIDED IN CHAPTER 23.54

SMC 23.54.015 TABLE C - REQUIRED PARKING FOR PUBLIC USES AND INSTITUTIONS

N. SCHOOLS, PUBLIC ELEMENTARY AND SECONDARY: 1 SPACE FOR EACH 80 SQUARE FEET OF ALL AUDITORIA OR PUBLIC ASSEMBLY ROOMS, OR 1 SPACE FOR EVERY 8 FIXED SEATS IN AUDITORIA OR PUBLIC ASSEMBLY ROOMS CONTAINING FIXED SEATS, FOR NEW PUBLIC SCHOOLS ON A NEW OR EXISTING PUBLIC SCHOOL SITE

FOOTNOTE 7:

FOR PUBLIC SCHOOLS, WHEN AN AUDITORIUM OR OTHER PLACE OF ASSEMBLY IS DEMOLISHED AND A NEW ONE BUILT IN ITS PLACE, PARKING REQUIREMENTS ARE DETERMINED BASED ON THE NEW CONSTRUCTION.

WHEN AN EXISTING PUBLIC SCHOOL ON AN EXISTING PUBLIC SCHOOL SITE IS REMODELED, ADDITIONAL PARKING IS REQUIRED IF ANY AUDITORIUM OR OTHER PLACE OF ASSEMBLY IS EXPANDED OR ADDITIONAL FIXED SEATS ARE ADDED. ADDITIONAL PARKING IS REQUIRED AS SHOWN ON TABLE C FOR 23.54.015 FOR THE INCREASE IN FLOOR AREA OR INCREASE IN NUMBER OF SEATS ONLY.

REVISED DEPARTURE

The code requires 48 vehicular parking spaces.
 SPS proposes 15 vehicular parking spaces for a revised departure of 33 spaces.

REQUIRED PARKING SPACES	48 SPACES
PROVIDED PARKING SPACES	15 SPACES
DEPARTURE	33 SPACES

Correction Response:

Prior Use of Site for Parking

There was a paved service area on the south side of the school, accessed from a driveway curb cut on 59th Avenue SW. While there were no permitted parking stalls here, staff used the paved area for private vehicular parking during the school day. Traffic counts reported up to 19 vehicles parked in this area.

- Property Line
- Former paved service area



Correction Response:

Ground Floor Program Priorities

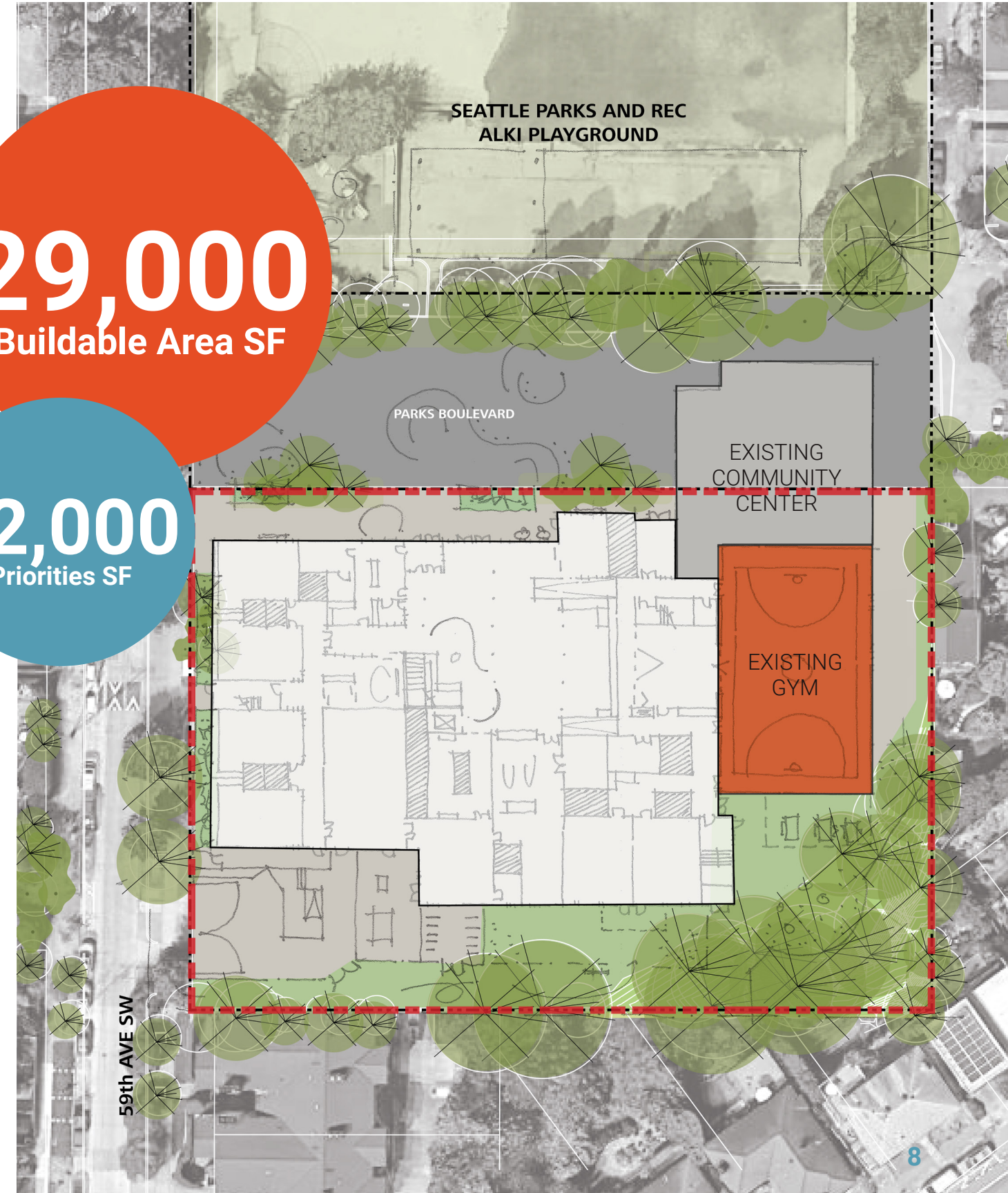
Ground floor requirements specific to elementary schools drive a minimum building footprint size. No matter the student capacity of the replacement school, the footprint of the new school building is effectively set and cannot be reduced significantly to provide code-required parking.

Ground Floor Priorities

Entry	Gym + Support	Mechanical
Administration	Commons	Main Electrical
Family Center	Kitchen	MDF
Preschool	Performance	Circulation
Child Care	Assembly Toilets	
Kindergarten	Loading and Receiving	
Intensive Services		

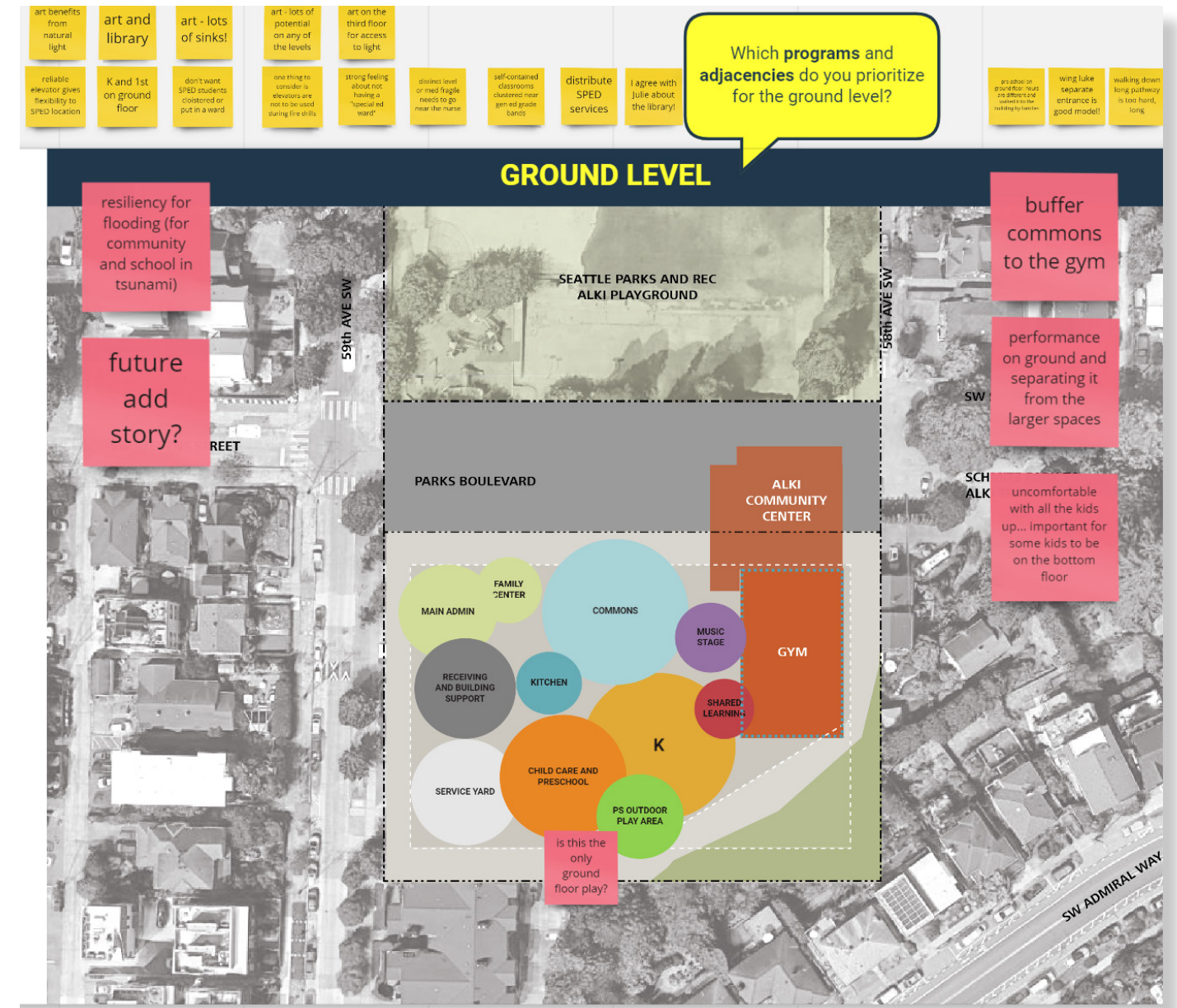
29,000
Buildable Area SF

32,000
Priorities SF



Correction Response: Ground Floor Program Priorities

Recognizing the competing priorities for the school's ground floor area, the School Design Advisory Team (SDAT) was asked to give input. As illustrated by the image to the right, the majority of SDAT members supported the dedication of site area for education over parking. This conclusion was coupled with an understanding that a Transportation Management Plan will be prepared prior to the school opening to improve traffic operations.

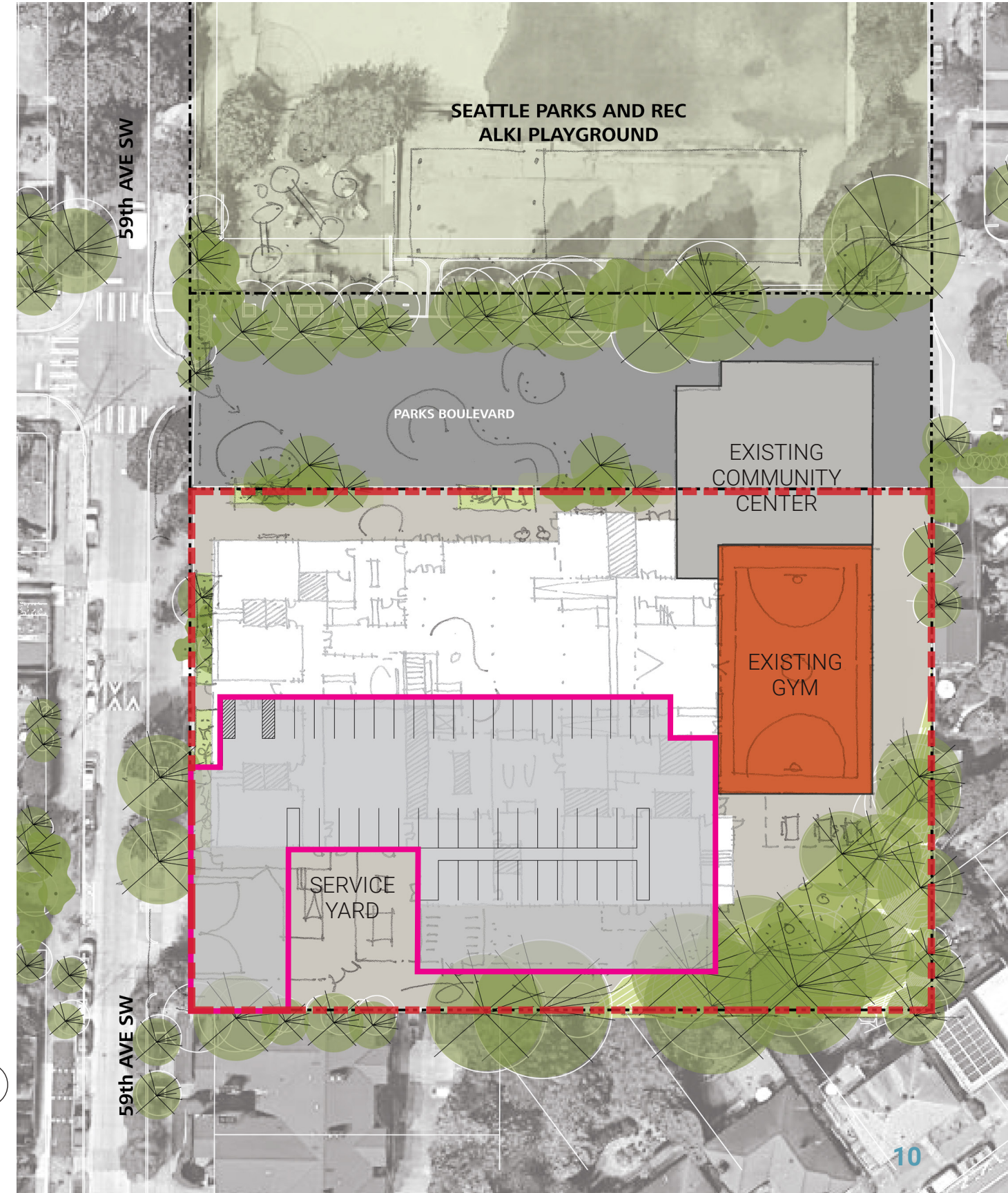


Correction Response:

On-site Code Compliant Parking

Ground floor requirements specific to elementary schools drive a minimum building footprint size, incompatible with space requirement for 48 surface parking spaces. If all code required parking were provided, a parking lot sized at half the buildable area would be required, as illustrated in the graphic.




Additionally, the School Traffic Safety Committee encouraged the project to minimize the site area dedicated to private vehicles for multiple reasons: improved pedestrian safety, improved air quality, noise reduction, and equity with alternative forms of transportation.

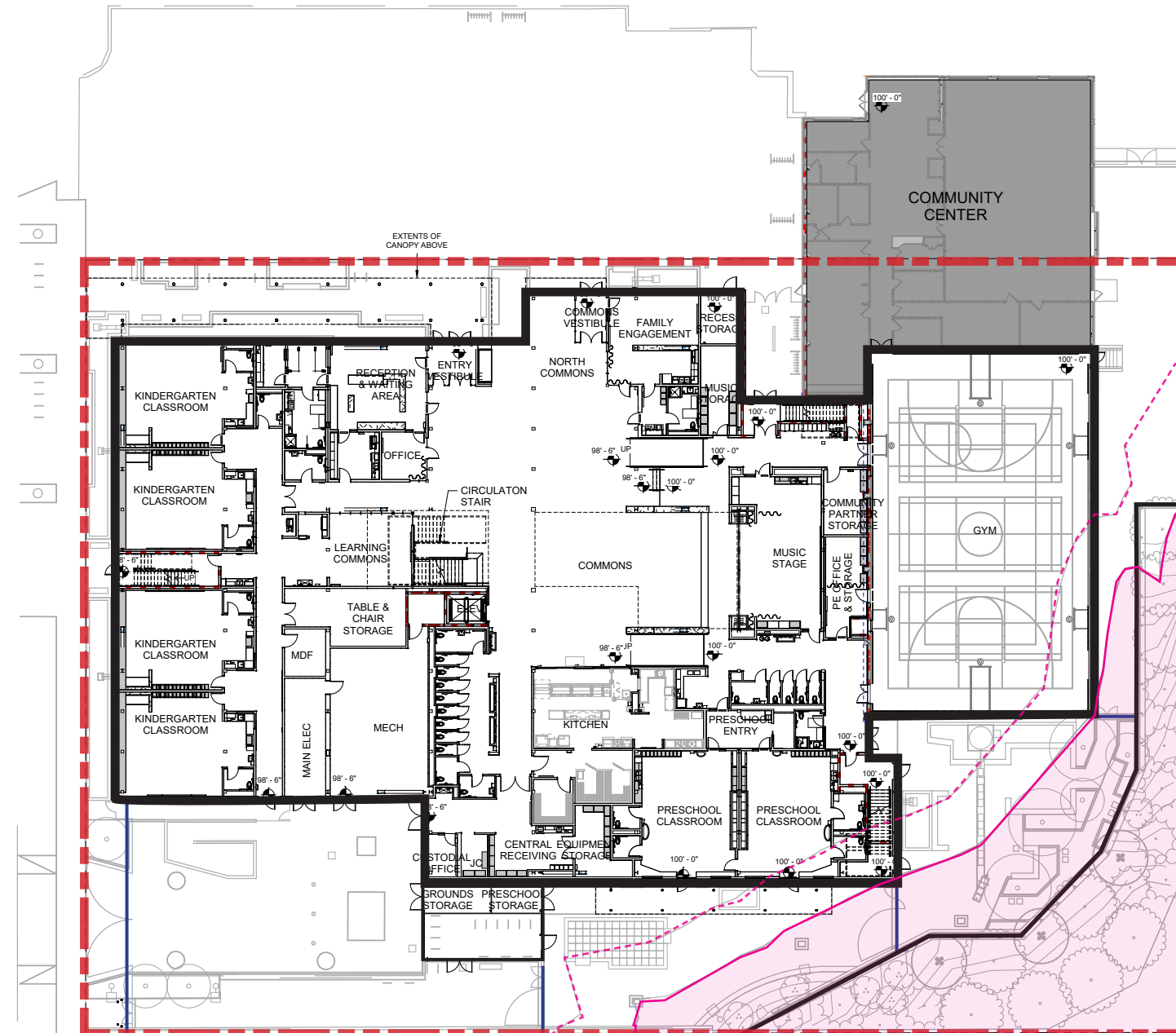


Correction Response: Prior Site Design

The site design as previously proposed with zero parking spaces is illustrated to the right.

Based on the necessary footprint of the building to accommodate the educational needs of the student population, there were limited options for providing on-site parking outside of removing critical educational programming.

-  Property Line
-  Environmentally Critical Area Buffer
-  Environmentally Critical Area Steep Slope



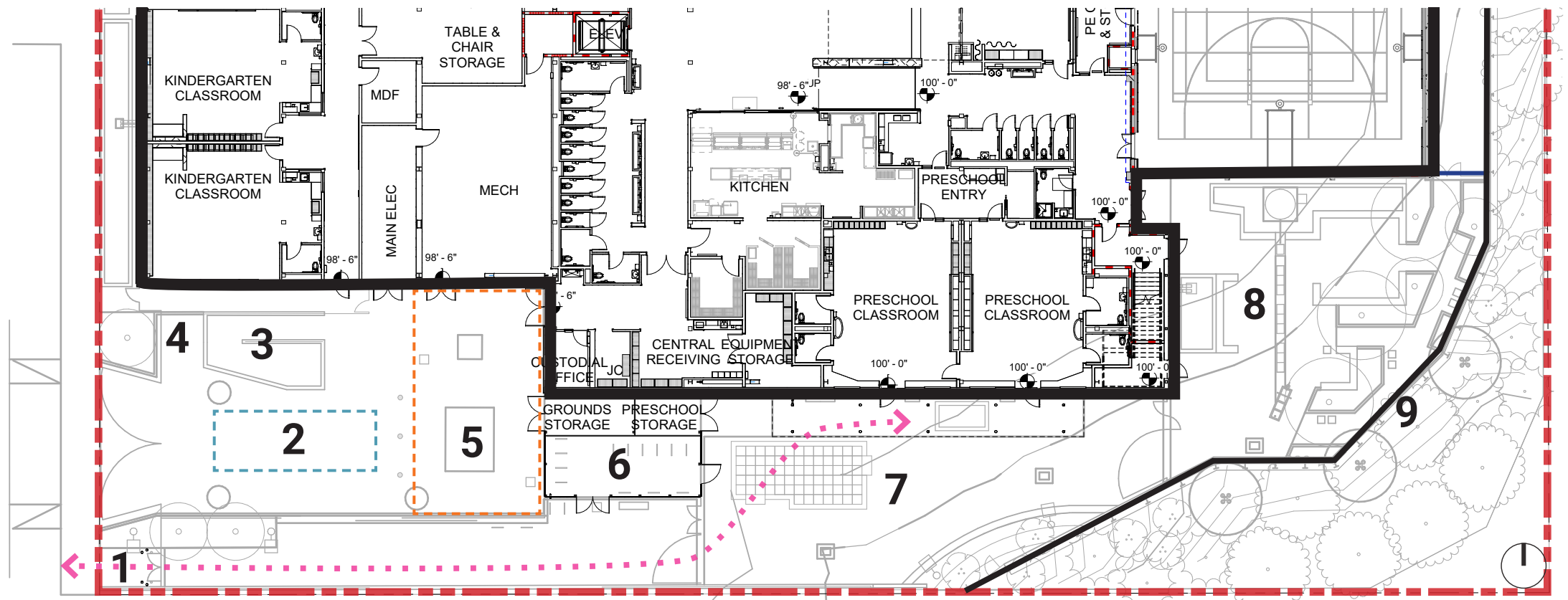
Correction Response: Prior Site Design

As each element of the school is necessary to accomplish the educational goals of SPS, the team explored how to retain only the critical elements of the school while reconfiguring or removing features that are important and desired, but not critical to the functioning of the school.

Of the nine site elements identified to the right, items 1 through 3 were removed from the project, items 4 through 7 were reconfigured, and items 8 and 9 were maintained as previously designed.




SITE PLAN KEY

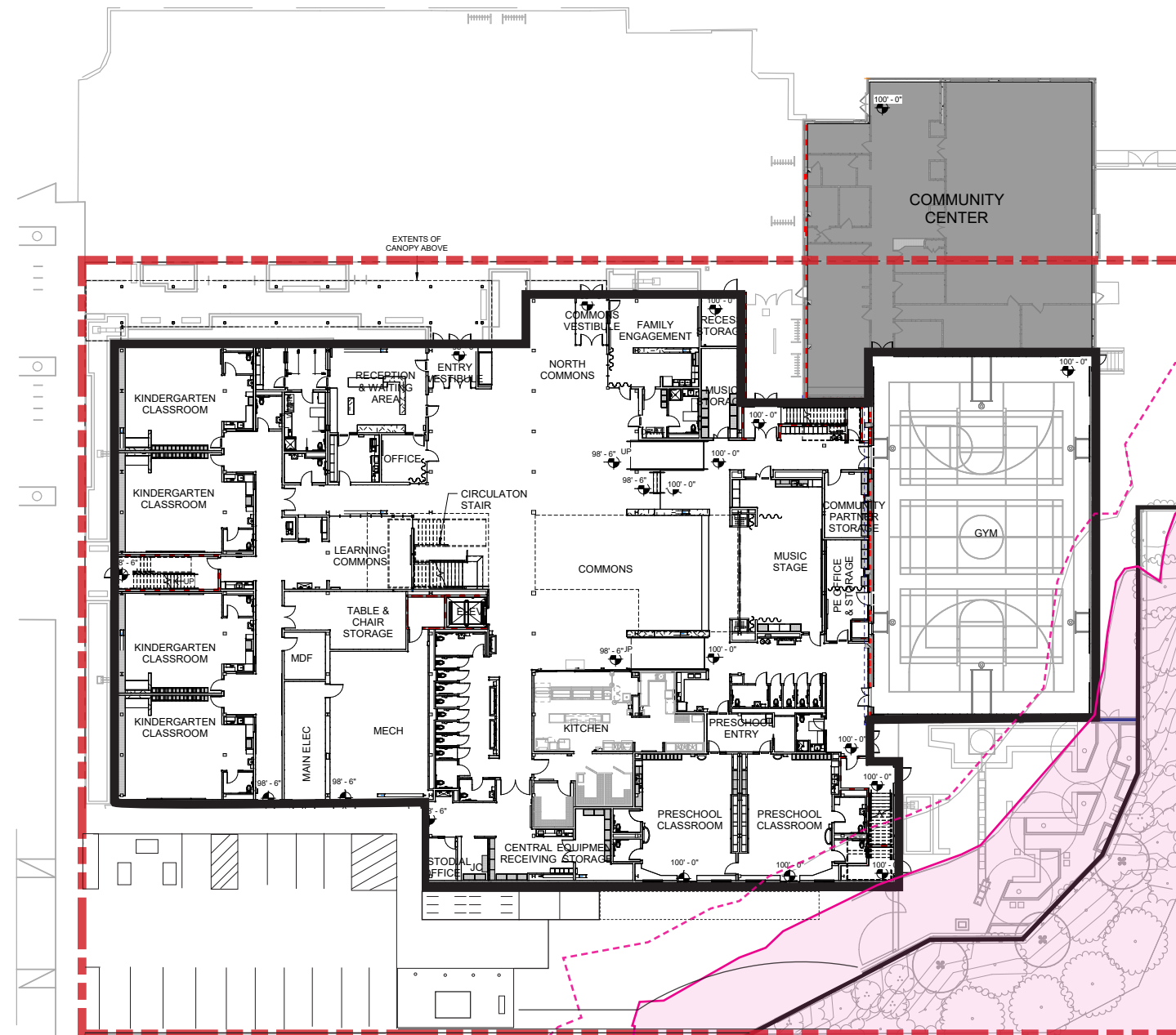
- | | |
|----------------------------|--|
| 1. Preschool Entrance | 5. Transformer, Secondary Cabinet & Clearances |
| 2. Dedicated Delivery Area | 6. Covered and Secure Bike Storage |
| 3. Waste Loading Platform | 7. Preschool Play Area |
| 4. Waste Receptacles | 8. Outdoor Learning Area |
| | 9. Permanent Retaining Wall |



Correction Response: Proposed Site Design

The result is that SPS is able to redesign the school to accommodate 15 parking stalls, including one ADA van stall. Depending on the needs of the student and staff population at the time the school reopens, it is possible that SPS can include one additional ADA stall and/or a time-limited load/unload zone. Now that an ADA stall can be included on the school site, the previously proposed on-street ADA stall across the street has been removed, which will result in retaining one additional on-street parking stall.

-  Property Line
-  Environmentally Critical Area Buffer
-  Environmentally Critical Area Steep Slope



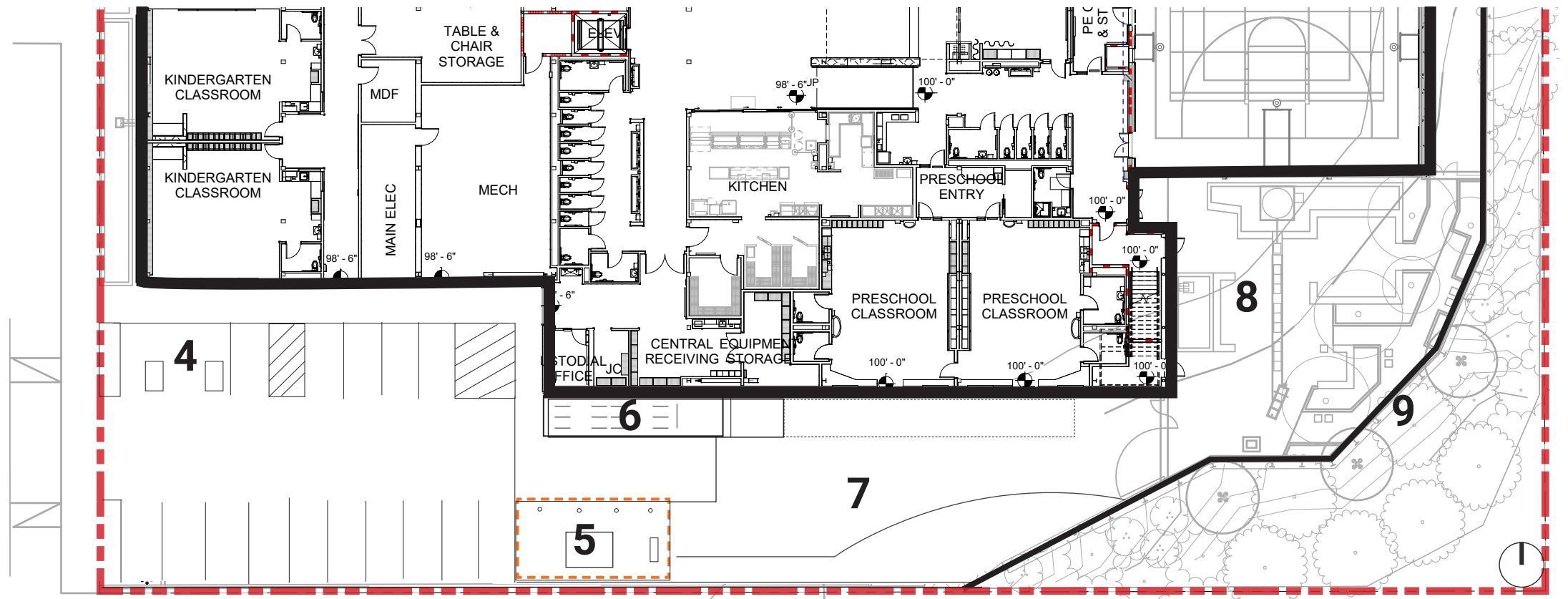
Correction Response: Proposed Site Design

The building plan and educational program are not affected by the design revision.

This redesign sacrificed those elements that are desired for the functioning of the school, such as better loading, storage, and separated pedestrian path and left only those architectural elements that were necessary to meet educational goals.

SITE PLAN KEY

- | | |
|----------------------|--|
| 1. N/A | 5. Transformer, Secondary Cabinet & Clearances |
| 2. N/A | 6. Covered and Secure Bike Storage |
| 3. N/A | 7. Preschool Play Area |
| 4. Waste Receptacles | 8. Outdoor Learning Area |
| | 9. Permanent Retaining Wall |



Correction Response: Vehicular Parking Quantity Smallest SPS Site Areas and Vehicular Parking Spaces Provided



This table looks at enrollment and parking data from SPS elementary schools located on small-size properties. The schools are organized by property size, with Alki having the smallest site at the top. As the table illustrates, there is a correlation between the size of the school site and the number of parking spaces accommodated. The data shows us that parking is minimized or eliminated when the property size is smaller than four acres.

ELEMENTARY SCHOOL	RECENT WORK	ENROLLMENT	STAFF	SITE AREA	PARKING
Alki	(Proposed)	542*	65-75*	1.41	15
Montlake	(Proposed)	500*	65-75*	1.65	0
Emerson	2001	287	58	1.83	4
Beacon Hill Intl	2006	422	68	1.94	2
Stevens	2001	185	34	2.38	8
Magnolia	2019	336	41	2.45	6
McGilvra	2018	282	35	2.48	0
Hawthorne	1989	385	58	2.63	7
Whittier	1999	477	51	2.69	0
Laurelhurst	1950	403	56	2.72	0
Loyal Heights	2018	411	54	2.85	0
Bryant	2001	594	51	3.31	4
Green Lake	(Master Plan)	500*	65-75*	3.38	0
Lowell	1962	330	83	3.89	0

*Projected Numbers