

# Exhibit 19

## **MEMORANDUM**

## **COMMUNITY DEVELOPMENT DEPARTMENT**

*Development Services Division*

TO: Mike Stevens, Planning Manager

FROM: Matthew Howie, Senior Planner

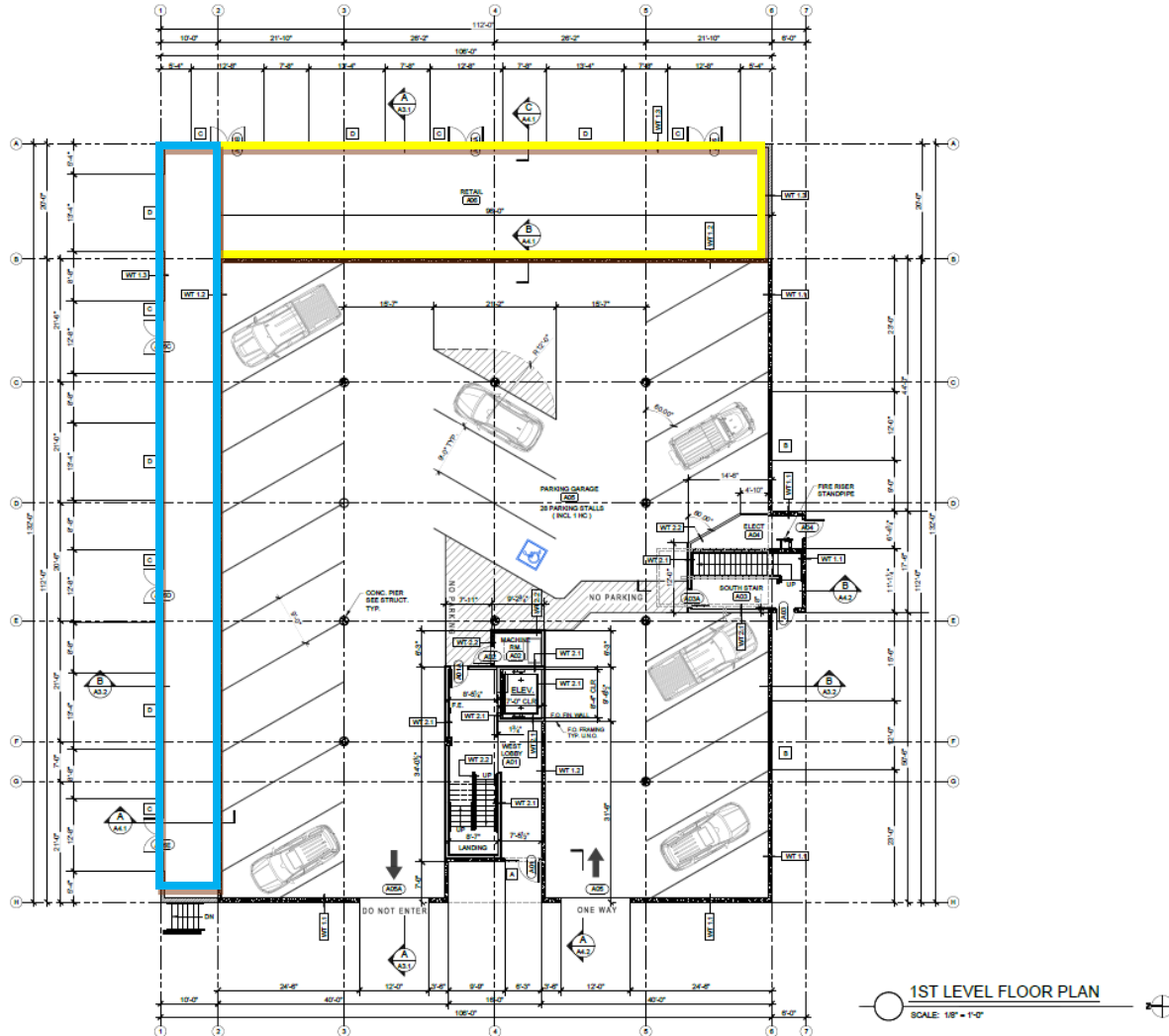
DATE: June 12, 2024

Mike,

Staff has taken time to give the Proponents' parking analysis a quick review.

In the 'Parking Analysis' report prepared for Cedar & Sage Homes [4/16/24] sections 2.0 'Methodology' and 3.0 'Calculations' the Proponent refers to two existing Parking and Access Agreements (in Appendix C and D) that include the subject property and nearby parcels. These parcels are, and will be home to, a number of businesses inclusive of The Bradley, Trilogy Hair Company, La Luna Wellness Studio, Velma Johnson, Longship Cellars, Hampton Inn, Brush Salon, Revel Medspa, and Marsh McLennan Agency. Parking Standards found within Chapter RMC 23.54 are applicable to all of these uses.

Specific to the proposal at hand, the Proponent calculates that 68 parking stalls would be required to meet Code requirements based on anticipated number of housing units and square footage of anticipated restaurant tenant (see yellow area in graphic, below). However, this calculation omits at least half of the proposed tenant spaces on the north side of the building as demonstrated on Sheet A2.1 (see blue area in graphic, below). Staff would also like to note that the restrictive dimensions of the restaurant use (96' x 22') suggest Proponent might anticipate some dining outside. Whether or not that would be permitted per easements and other restrictions is beyond the scope of this comment, however, please note that Planning counts outdoor dining to parking requirements for restaurant uses per 1 stall to 100 square feet. Outdoor dining would increase parking required for this use commiserate with square footage dedicated to that use.



Proponent also invokes the privileges of RMC 23.54.080 and provides a calculation showing a 10% reduction in their current parking requirements. While a 10% parking reduction can be applied to this proposal, the application of the 10% reduction is not a per-use or per-property reduction, instead, all tenants on all subject properties enjoy the benefit of the total 10% reduction. RMC 23.54.080 reads “For joint use of parking facilities, the **total** number of required spaces may be reduced by 10 percent.” [Emphasis added by Staff.] As such all uses’ parking requirements are added together and the total 10% reduction is then applied. Parking analysis should include all uses, inclusive of Hampton Inn, The Bradey, etc., along with the proposed uses/use types on subject property.

As Staff reads it, RMC 23.54.080 recognizes that there are benefits to combining parking areas to eliminate duplicative and superfluous parking by bundling uses

together that have different use patterns. Uses such as churches beside taverns or banks beside theatres, are referenced and allowed even greater reductions. Those benefits, however, are offset by the shared responsibility of property/building owners subject to the Parking/Access Agreements in that all uses are required to pool parking spaces. As such, it is possible that the Proponent will find surplus parking on nearby properties, or, it could be possible that a current parking deficit exists between subject properties that would need to be accounted for when new development takes place.

In conclusion, the Proponent should do the following to take full account of parking requirements:

1. Perform a parking analysis inclusive of all tenants/uses on all properties subject to the reciprocal Parking/Access Agreements.
2. Count the existing number of parking stalls "on-the-ground" within all parking areas subject to reciprocal Parking/Access Agreements.
3. Determine and definitively state the allowed future use types within categories listed in RMC 23.54.020 to be housed within the building. Only by definitively stating what use types will be in the commercial, ground floor areas of this project can the Proponent actually determine their parking requirement.