

Amazon Corner TIA: Additional Testimony
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1. Regarding Appellant Hearing Presentation, slide 13, "Parking Analysis is Required":

Below is the text from this slide:

Administrative Rule Section R-9.8650-G states:

Traffic Impact Analysis (TIA) - Compliance with Other Standards. The applicant shall include in the TIA sufficient information to show the proposed development is in compliance with applicable development standards of the Eugene Code, 1971, including, but not limited to:

1. Parking. Adequate parking will be provided to meet site-generated demands, in accordance with the specific dimensions, parking angles, and parking ratio requirements that are contained in the Eugene Code, 1971.

The language of this rule is ambiguous. The initial phrase "*Adequate parking will be provided to meet site-generated demands*" would indicate that the development itself should ("will") meet site-generated demands. However, this is contradicted in the subsequent reference to "ratio requirements", which undermines a fact-based prediction of true site-generated demands. The abstract concept of a "ratio" of needed spaces is, in effect, a planned deficit. While Staff have discretion here, they made their default position clear at the hearing by pointing to the "ratio" allowed, and failing to seek or take into consideration the concerns of the affected neighbors. There is no check in this process on staff bias toward favoring the applicant.

The net result is that the number of spaces proposed (in this case, 159) does not reflect any real-world, fact-based analysis of likely vehicle ownership rates by 117 households (average of 1.5 to 2 vehicles each¹) and spaces used by their guests, by business employees or customers—no such data is even included in the application. A conservative estimate of actual spaces needed easily surpasses 200 (e.g., 1.5 vehicles/household = 176; household guests = 10; employees + customers = 30; total = 216; resulting overflow to neighboring streets = 57 or greater).

Given the conflicting language in the rule, the Hearing Officer has to make a judgment of its overall intent. That this rule exists at all indicates that writers of the code deemed the provision of adequate parking by the development an issue relative to protection of neighbors' interests. If the site does not meet site generated demands, the surrounding neighbors would be impacted.

What level of impact from Amazon Corner is acceptable for the neighbors to have to absorb? Should neighbors who have depended on the spaces in front of their homes for years, due to their single-car driveways, now have to compete for those spaces with overflow from the development? In effect, should the neighbors have to accommodate the applicant's ambitions to maximize site traffic without having to provide adequate parking?

We argue that the applicant should be required to provide "adequate parking... to meet site-generated demands" period. Yet, staff have approved a TIA with a planned deficit of onsite parking and planned use of off site spaces in front of neighbors' homes.

¹ US Dept of Transportation data indicate 2-person households average 2 vehicles. Source: www.rita.dot.gov.

2. Regarding Appellant Hearing Presentation, slide 14, "Additional Intersection Study Required":

Below is the text from this slide:

Administrative Rule R-9.8650-F(8) states:

8. Transportation Systems and Level of Service Requirements. The TIA shall include:

8. 1 Roadway and Intersection Capacity.

8. 1. 1 All streets and intersections contiguous to the development;

8. 1. 2 All streets and intersections that provide direct access to or from the development, regardless of the generated volume of traffic;

8. 1.3 All streets and intersections off site from the development that will receive 50 or more additional peak-hour vehicular trips upon completion of any phase of the development;

According to this rule the applicant erred by designing its TIA to include the intersection of 30th and Hilyard while omitting the intersection of 32nd and Alder. The applicant asserted at the hearing that 32nd and Alder should not be included in the TIA because it is not "contiguous" (8.1.1 above) nor provides "direct access" (8.1.2 above). However, the intersection of 32nd and Alder is no less relevant than 30th and Hilyard in both regards, in fact more so. Specifically:

Regarding 8.1.1: Neither intersection is actually contiguous with the development site property. 30th and Hilyard is more than a full block north of the site's northern boundary and its northernmost cutout/access just south of 31st. While 32nd and Alder is also not contiguous to the site, it is much closer to the site's nearest access cutout on 32nd than is 30th and Hilyard to its nearest site access cutout. Relative to the block on which the site property is positioned, both intersections are equally contiguous.

Regarding 8.1.2: If "direct access" to the site is the criterion for inclusion in the TIA, then 32nd and Alder should have been included since that intersection is substantially closer to the site's access cutout on 32nd than is 30th and Hilyard to its nearest site access cutout, which is just south of 31st.

Thus, by whichever inclusion criterion is used -- "contiguousness" or "direct access to or from the development" -- the 32nd and Alder intersection must be included in the TIA. This is not an insignificant omission because of Alder's special importance as a designated bike path, in combination with the other traffic dynamics of this intersection discussed relative to the development.

Finally, because of the planned deficit of onsite parking, the surrounding residential streets will have added traffic from users of the development who are searching for parking in the neighborhood. The intersection of 32nd and Alder is most likely to be impacted by this "parking search" behavior because of its proximity and direct access to multiple side street options. This will add to the traffic volume to and from the development that is already crossing the intersection and bike path. Each episode of offsite parking potentially generates up to two passes through this intersection: the first to begin searching for a space on a nearby side street, and the second after retrieving the car from that space to leave the area. Thus, increased traffic through 32nd and Alder due to the planned deficit of onsite parking should be included in the TIA.