

Dear Transportation Commission Member,

This comment focuses upon a single significant flaw in the draft Plan: its misplaced reliance on the Fairhaven Parking District to address parking demand within Fairhaven's commercial core. The Plan recognizes the existence of a problem which the Parking District was supposed to prevent, yet staff proposes no change in the district's role. No credible evidence suggests the privately operated district possesses the will, the power, or the resources to solve the acknowledged parking problem, and many signs point to the opposite conclusion. Continued reliance on a private entity to solve this public problem is no longer justifiable. This comment proposes an alternative.

The Parking District has not functioned as promoted

Although the UV Plan's text does not focus on it, the supporting documents prepared by the City's consultant graphically disclose the extent of the problem within Fairhaven's commercial core where average parking utilization rates often exceed 100%.¹ Yet the public was promised in 1990 that the then-proposed Parking District would prevent just such a parking problem. The District, We were told, was supposed to create about 200 new on-street parking spaces and up to 600 new spaces in off-street parking lots.²

By the spring of 1994, shortly before the District was formed, the total parking supply within the proposed District boundaries was no more than 634 spaces, 345 on- and 289 off-street.³ The planning staff projected that full build-out of District properties would create demand for at least 1000 spaces within the District.⁴ Yet the staff had only modest faith in the District's capacity to create new on-street parking: Staff felt the District could add only about 70 spaces, thus increasing the on-street parking supply to 415 spaces.⁵ The remaining spaces needed to support the expected build-out, then, would need to come from a dwindling number of parking lots.

Unfortunately, the formal agreement to implement the Parking District contained no requirement that the District create any specific number of new parking spaces. The District was required to improve parking on McKenzie "to the satisfaction of the City", but the only numerical expectation of the District was that it would "expend a minimum of \$300,000 for parking and pedestrian improvements in or adjacent to the parking district."⁶ Once McKenzie was improved, however, the City would waive code requirements regardless of the actual public benefits so obtained.

Over seventeen years have passed, yet the District has neither fulfilled the original promise of new on- and off-street spaces, nor expended the contractually required \$300,000. Predictably, however, the District has been wildly successful at development, which simultaneously has increased the demand for parking while diminishing the net supply.

Parking waiver-enabled development has eliminated most parking lots from the supply

The Parking District has been an unbridled success at creating buildings everywhere, but an abject failure at providing standard required parking anywhere. Instead of creating more parking, waivers of parking requirements for member properties led to a Gold Rush-like level of

development⁷, which both increased the demand for parking infrastructure and decreased the overall parking supply.

Small lots, previously used for parking prior to the establishment of the Parking District, have been redeveloped for other uses since the District was established:

Former Small Parking Lots, Now Buildings:

- 1) Lot on Harris between 12th and 11th: Finnegan Alley *built* circa 1998.
- 2) Lot SW of 11th and Mill: Village Books *built* circa 2004.
- 3) Lot NE of 11th and McKenzie: Young Building *built* circa 2007.

Five larger off-street parking locations within or adjacent to the Parking District were presupposed by the 1994 plan to remain as the source for a permanent parking supply.⁸ Of those five parking lots, only two remain in existence today, and both of these remaining lots are designated as opportunity sites for building development in the present UV Plan Draft.

Former Larger Parking Lots, Now Buildings:

- 1) Lot SW of 10th and Mill: Fairhaven Village Inn *built* circa 1998.
- 2) Lot NE of 11th and Mill: Fairhaven Garden *built* circa 2004.
- 3) Block SW of 10th and McKenzie: McKenzie Square *built* circa 2007.

'Permanent' Parking Lots, Unbuilt 2012:

- 1) Block NW of 11th and Mill ("Pit"): currently available for parking, identified in the UV Plan Draft as an opportunity site for building.⁹
- 2) Lot NW of 11th and McKenzie: currently available for parking, identified as probable site for building.¹⁰

In other words, during this brief period of rapid growth since the striping of McKenzie, no additional parking spaces were created by the Parking District. The parking supply striped onto the streets has become inadequate due to the development which ensued on off-street parking lots.

The District's continued existence ensures that the problems it creates will worsen

There is no place left for the District to create parking anywhere near the commercial core in the FUVDP Draft as written. Only two of nine previously existing or proposed parking sites have not already received buildings. Likely every parcel within the Parking District boundary has by now

purchased Parking District membership and anticipates waiver from parking requirements when inclined to proceed with development.

Two other factors reinforce the impossibility for the Parking District to ever fulfill its mission. First, the number of on-street parking spaces actually shrinks as development advances, eroded by driveways accessing private parking for residents of the new buildings. Likely more than 40 street spaces have been consumed by driveway entrances since angle striping occurred.

Secondly, additional properties have become District members since 1994. Parking requirements for the new properties are likewise waived. It is likely that Sycamore Square is among the more recent member properties and waived from parking requirements. The parking lot NE of 13th and Mill, presently serving Sycamore Square, had been identified in 1994 as the sixth and last larger off-street parking site to be relied on for off-street parking.¹¹ This parking lot is now identified by the City staff as yet another probable site for development.¹²

In addition to failing to provide parking, the Parking District impedes progressive transportation concepts in Fairhaven. For example, dedicated, continuous bike lanes cannot be created on streets including Harris, 11th or 12th because the Parking District depends upon those streets for its absurdly deficient parking supply.

Another problem that attends the UV Plan's reliance upon the Parking District is the moral hazard of continuing the subsidy of development that parking waivers represent. What happened in 1994 was that private land owners, who deemed their property as much too precious for parking, found officials who agreed that street rights-of-way – public property – should instead be sacrificed to the parking demand generated by the owner's development. Yet an important exception is made when streets are vacated and converted to building sites, for then suddenly parking is no longer needed on those streets. The nature of this subsidy fools no one. The cost of parking should be more equitably shared between those who generate the demand for it, and those who consume it.

The Parking District budget is inadequate to provide solutions to these problems and more, off-street surface or structured parking plainly is quite far from Parking District reach. The continued existence of the Parking District ensures that the problems it creates and cannot solve will only increase and worsen over time.

These problems can be solved, but not by the Parking District

The Parking District lacks necessary resources for the task of supplying parking. It has an inadequate budget, and no means for raising adequate funds. It can do nothing about either inadequacy, for it holds no political tools. Yet for a fixed fee District members are allowed to create unlimited parking demand. The District members and officers lack a keen interest in mitigating the problems so perpetuated, because they are not accountable to the public.

A better way to handle this situation would be through the City's Transportation Benefit District under Chapter 36.73 RCW. The TBD would place all of the political tools and resources needed to solve parking problems, in the hands of elected officials. Sitting as TBD board members,

elected officials would be more likely to avoid creating an appearance they had unfairly subsidized development.

I hope that the commission will recognize that past conditions which may have justified Parking District creation no longer exist. The Parking District's functions either should be transferred now to an entity capable of providing modern transportation benefits, or terminated so that code requirements for parking can operate normally to mitigate the effects of development. The UV Plan Draft, as written, does nothing to address the Parking District's failure to provide an appropriate parking supply and allows increasingly harmful impacts to be carried forward, likely far into the future.

Three documents mentioned in the notes are attached. Thank you for your consideration of these concerns.

Sincerely,

David Carlsen

¹ Transpo Group October 2011 Parking Plan, Technical Appendix, Figures C.1 through C.8 (PDF pages 22–29).

² Oct. 2, 1990 SEPA Checklist for Fairhaven Parking Study, p. 15, Item 14.c. The contact person named on this checklist was William T. Geyer, who was then the City's Planning Director.

³ Mar. 31 1994 Planning Comm'n Findings of Fact and Conclusions, p. 6, Table 2 (staff count including informal, unimproved on-street spaces).

⁴ Id, p. 7. Staff reduced its projected demand for 1,300 spaces by 20% in anticipation of compact development.

⁵ Id, p. 8. Angle parking along a stretch of McKenzie was expected to supply these 70 spaces.

⁶ Oct. 19, 1994 "Parking Improvement Agreement" between Fairhaven Village Association and City of Bellingham, Sec. 1.B.

⁷ 12/21/11 Draft UV Plan, p. 27 (District had the "most significant impact on Fairhaven since the railroad speculation of the 1880's. . . . enabled the construction of 32 new buildings, as well as the adaptive reuse of *all* the historic buildings." (emphasis added.))

⁸ Map 4, p. 18 ("Proposed Off-Street Parking") and Table 5, pp. 16–17 ("Phase II – Possible Parking Lot Locations"), in COB Planning Commission March 17, 1988 Findings of Fact and Conclusions, Attachment D ("Fairhaven Parking Study"). A total of six off-street lots were presupposed by the 1994 plan; see text accompanying note 11, below.

⁹ 12/21/11 Draft UV Plan, pp. 29, 31.

¹⁰ 2/7/2012 Staff presentation to Transportation Commission, Slide 9 ("3D Modeling - view impacts"). Accessed 2/26/2012 at <http://www.cob.org/documents/planning/neighborhoods/2010-docket-materials/fairhaven-np/2012-02-07-transportation-commission-ppt.pdf>.

¹¹ See Note 8, above.

¹² See Note 10, above.