



CITY OF  
TUCSON

PLANNING &  
DEVELOPMENT  
SERVICES  
DEPARTMENT

May 15, 2013

Jason Morse  
Grenier Engineering, Inc.  
5524 E 4<sup>th</sup> St  
Tucson AZ 85711

**Subject: NOTICE OF DECISION**

The Junction at Iron Horse – Individual Parking Plan Update;  
Supplemental Parking Demand Analysis; Additional Analysis  
T13SA00055; 504 E 9<sup>th</sup> St

Dear Jason:

I am in receipt of the “Junction at Iron Horse Individual Parking Plan Update” (IPP Update) dated and sealed December 18, 2012, the “The Junction at Iron Horse Individual Parking Plan Update Supplemental Parking Demand Analysis” (IPP Update SPDA) dated February 20, 2013 and sealed March 5, 2013, the “Individual Parking Plan Update Additional Analysis” (IPP Update AA) dated April 10, 2013 and sealed April 11, 2013, and “The Junction at Iron Horse Individual Parking Plan Update Supplemental Parking Demand Analysis” (IPP Update SPDA II) dated and sealed April 19, 2013. All of the above (collectively “the IPP Updates”) serve to update the previous Individual Parking Plan (T12SA00091) approved in March of 2012 (IPP).

The IPP Updates include the following:

- An IPP/MDR development plan dated April 15, 2013 and sealed April 10, 2013.
- A project specific analysis of parking demand at The District (a student housing project approximately 1/3 of a mile northwest of the subject site which opened in the fall of 2013).
- Related information regarding Roosevelt Point, a student oriented apartment project under construction north of the Phoenix central business district.
- A discussion of the 4<sup>th</sup> Avenue Business District Parking Study prepared for ParkWise in September 2012.
- A summary of the Federal Highway Administration funded “Right Size Parking” (RSP) Program in Seattle Washington.
- Application of the RSP Program parking calculator to The Junction
- A February 2013 article from the Institute of Transportation Engineers Journal titled: “Do Land Use, Transit, and Walk Access Affect Residential Parking Demand?”

- The IPP approval letter dated March 26, 2012
- Documentation of a neighborhood meeting conducted February 20, 2013.
- Updated recommendations for parking supply at The Junction based on several factors including the "Right Size Parking (RSP) Program parking calculator and the assumptions used to generate inputs to the RSP parking calculator, and further adjusted based on transit availability, pricing assumptions, resident/visitor mix, and uncertainty.
- Within the IPP updates, the applicant has produced three additional recommendations for parking demand for the IPP Updates: 0.46 parking spaces per bed on 12/18/12; 0.42 spaces per bed on 2/20/13; and 0.54 spaces per bed on 4/11/13. (The initial recommendation for parking demand, provided with the original IPP on 2/16/12 was 0.70 parking spaces per bed.)

#### Public Comment

Public comments were accepted from March 20, 2013 to April 9, 2013 and from April 23, 2013 to May 13, 2013. (There were two comment periods because the applicant suspended review of the project during the first comment period in order to revise the design. The revised design necessitated a second comment period.) Notice of the public comment periods was mailed to the owners of 124 properties within 300 feet of the property, and was posted on the property along the 9<sup>th</sup> Street, 10<sup>th</sup> Street, and 3<sup>rd</sup> Avenue frontages. Accounting for neutral responses, protests that were rescinded, and duplicates, there were 19 approvals, and 28 protests. Of the respondents indicating a protest, general themes related to parking included a desire for more on-site parking spaces, more than the minimum number of required parking spaces, one parking space per bedroom, a preference for a smaller project, complaints that parking is bad now and would be worse in the future, noise, traffic and law enforcement problems, concern regarding lack of visitor parking within the project and the existing shortage of parking in the neighborhood during community-wide events on 4<sup>th</sup> Avenue.

The Iron Horse Neighborhood Association submitted a conditional letter of support in response to the City's request for comments on the proposed Modification of Development regulations (MDR) and the IPP Updates. The letter contained seven conditions specifically addressing parking and transportation issues. These conditions include providing Sun Tran passes to project residents, charging for parking, availability of car share vehicles, residents to support the modern streetcar, speed humps, and a traffic mitigation plan. Staff notes that a traffic mitigation plan may or may not include speed humps. Pertinent Design related concerns addressed improvements to the landscaping and pedestrian amenities, setbacks sufficient to allow appropriate streetscapes and sidewalks, and outdoor lighting. Because conditions were attached that are beyond the scope of the Individual Parking Plan review, the letter from Iron Horse Neighborhood Association was considered neither an approval nor a protest.

### Analysis

The IPP Updates state that the University District in Seattle (also referred to as the University Heights district) is similar in urban form to the neighborhoods around the University of Arizona and would be expected to have a mode split very similar to the Iron Horse area. (Mode split, or share, is the percent of trips to or from a destination made by driving, transit, or walking, and can be used as a proxy to determine how much parking a project will require.) While the demographics of the two areas are similar, the population of the University District is close to 90 times that of the Iron Horse neighborhood (26,279 versus 294) rendering the similarities mute.

The IPP Updates look at seven Seattle student housing properties identified as mostly within the University District. The largest of the seven properties is roughly 60% of the size of the Junction (140 residents versus 232), with slightly more than half the residents per unit as the Junction (1.64 versus 3.05). The significant difference in the project scale and unit size creates doubt in any conclusion drawn based on similarity of the Junction to the Seattle student housing.

The applicant used the RSP parking calculator to estimate a peak parking ratio of one parking space for each unit for a total of 76 parking spaces. The unit size input in the RSP calculator doesn't differentiate between three and four bedroom units even though the parking ratio per unit goes up as the number of bedrooms per unit goes up. This is significant because there are more four bedroom units in the Junction than any other size unit. The applicant's decision to increase the transit service factor in the RSP calculator based on existing and future transit service serving the Iron Horse area is not supportable without a comparable analysis of the existing and future transit service in Seattle's University District. The applicant uses a six mile average commute distance but does not provide any justification, nor explain the impact of that decision. Finally, the applicant adds an adjustment for visitor parking. This approach would double count any overnight visitors parking on the project site and is not consistent with design of the RSP model.

The parking analysis for The District indicates that the existing parking ratios in the Land Use Code result in under utilized on-site parking facilities, but it also documents spillover parking occurring in the vicinity of The District. This information supports a reduction in the level of required on-site parking and holistic approach to manage the overall parking supply serving the project while eliminating or mitigating to the greatest extent possible off-site parking impacts in the vicinity of the Junction.

The IPP Updates do not address the impact of the project on the surrounding pedestrian infrastructure, or the influence improvements to the pedestrian infrastructure could have on mode choice among the residents of the project, or the future viability of commercial development within the project site. While the Iron Horse Neighborhood has the highest walk score in Tucson, the Walkscore algorithm looks at proximity to amenities, not the existence or quality of the local pedestrian system. The existing walking environment surrounding the project site presents many challenges including perceptions regarding crime in the area, vacant and poorly maintained properties, wide streets, large intersections, minimal sidewalks, undefined crosswalks, and inconsistent street lighting.

### Conclusion

The IPP Updates do not sufficiently establish that the data and research provided therein are more applicable and/or superior to the data and research provided in support of the IPP originally prepared and approved for this project. The initial IPP request (approved in March of 2012 at 0.70 spaces per bed and attached for reference) was a relatively minor reduction from the Code required 0.85 spaces per bed. The current request is more significant and requires a greater level of mitigation.

Staff supports a balanced approach that addresses increased automobile traffic and parking demand in the neighborhood, does not encourage automobile use by oversupplying on-site parking spaces, and ensures that non-automotive travel is an attractive option, not just a possible option. Given the location of the project in one of the most destination-rich locations in the City, a project that provides an appropriate amount of parking and an improved environment for all mode choices, including drivers, pedestrians, bicyclists, and transit users is not only supportable, but desirable.

### Decision

Subject to substantial compliance with the IPP/MDR development plan sealed April 10, 2013 and dated April 15 2013, and the following conditions, the Junction at Iron Horse – Individual Parking Plan Update is in compliance with LUC Section 3.3.5.1:

- a. The overall parking requirement for management and staff, residents, delivery, service vehicles, and visitors, including on-site and off-site parking, shall be calculated per the approved ratio for IPP T12SA00091 3<sup>rd</sup> Avenue – 9<sup>th</sup> Street Tucson Student Housing, 0.7 spaces per bed (232 beds x 0.7 = 162 spaces) and shall be provided as follows:
  1. On-site. A total of 135 on-site parking spaces.

2. Car sharing. A minimum of one car sharing vehicle (Hertz On Demand or similar) shall be made available to the tenants and general public. Each car sharing vehicle may be counted as eight spaces toward the overall parking requirement, up to a maximum of three car sharing vehicles. A minimum of one dedicated car sharing space shall be provided on-site in a location convenient to and accessible by the general public, or on one of the block faces adjacent to the project site (subject to ParkWise approval). Car share parking spaces, whether located on- or off-site, shall be made available to the car share operator at no charge.
  3. On-street. Up to 50% of the on-street parking space adjacent to and on the same side of the street as the project site may be counted toward the overall parking requirement. (As currently configured, this would equal 15 parking spaces –  $31 \times 0.5 = 15$ .) On-street parking, whether or not it is used to meet the overall parking requirement, shall be administered by ParkWise.
  4. Management/staff parking. A minimum of four parking spaces in the Centro Garage or the Depot Plaza Garage shall be leased from ParkWise for use by management and staff.
- b. Tenants shall have the option of not including parking in their lease. Parking shall be a separate charge, minimum \$60 per month, per space.
  - c. One Full Fare Stored Value Card (currently \$15) Sun Tran pass shall be included with each lease and shall be presented to the tenant on the move-in date.
  - d. Short-term bicycle parking shall be provided at minimum of 0.2 spaces per bedroom.
  - e. The four northernmost parking spaces accessed from the alley/PAAL adjacent to the existing commercial uses fronting on 9<sup>th</sup> Street shall be available for use by the general public from 6am to midnight. These parking spaces may be metered, subject to ParkWise approval, and/or time restricted.
  - f. Minimum eight (8) foot wide sidewalks shall be provided along 9<sup>th</sup> Street.
  - g. The owner/developer shall amend the existing public improvement agreement to provide for installation of required improvements per a Traffic Management Plan prepared by TDOT.
  - h. Streetscape lighting shall be per an approved photometric plan demonstrating lighting is evenly distributed, designed to prevent glare, and designed to eliminate relative dark spots.
  - i. The owner/developer shall prepare vandalism/security plan acceptable to the Tucson Police Department covering at a minimum all parking areas and the adjacent street frontages.
  - j. Outdoor loudspeakers are prohibited. Music (live or recorded) shall be six hundred (600) feet or more from residentially zoned properties.
  - k. The streetscape design shall comply with the MDR plan dated May 15, 2013.

1. A minimum of six months and no more than nine months after initial occupancy, the owner shall prepare and submit to the Planning & Development Services Department, a Parking Demand and Utilization Analysis (PDUA) for the project area. The PDUA shall at a minimum document:
  1. Peak weekday, Saturday, and Sunday parking utilization (hour and number) observed on-site, and on both sides of all streets adjacent to the project site.
  2. The percent of residential occupancy of the project.
  3. Number and percentage of tenants leasing parking through the project management, both on-site and off-site (as applicable).
  4. Utilization of car-sharing services.
  5. Outreach and feedback to/from neighborhood residents and businesses regarding parking availability in the area surrounding project site.
  6. Parking complaints received by ParkWise regarding the area within 600 feet of the project site.
  7. A survey of project residents and management addressing parking and transportation (on and off-site parking availability, mode choice – personal car, car share, carpool, streetcar, bus, bike, and walking).

Any substantive change to the above, and any reduction in on-site parking, shall require a revised Individual Parking Plan, including a new neighborhood meeting and public notice. The applicant is encouraged to contact ParkWise to review administration of on-street parking in the vicinity of the project. If the development is operated in a manner that is not in conformance with the above conditions, or the development causes adverse land use impacts, this approval may be suspended or terminated in accordance with Section 23A-54 of the Tucson Code. To provide a level of assurance that the above conditions will continue to apply to the site should ownership of the project be transferred, staff recommends the owner/developer record the above conditions, together with other pertinent conditions or restrictions as are acceptable to the owner/developer but beyond the scope of this action, as a covenant to run with the land in perpetuity.

This IPP decision rendered by the Planning and Development Services Director may be appealed to the Mayor and Council on the grounds that the decision is not in conformance with the criteria established in the Land Use Code by 1) filing a notice of intent to appeal with the City Clerk's office (791-4213) within fourteen (14) days after the date of this decision (i.e., no later than May 29, 2013), and 2) filing the complete appeal materials with the City Clerk's office within thirty (30) days of this decision (i.e., no later than June 14, 2013).

Jason Morse

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May 15, 2013

To expedite review of permits, please provide a copy of this letter with the development package submittal. If you have any questions, please contact Glenn Moyer at 520-837-4954 or by email at [Glenn.Moyer@tucsonaz.gov](mailto:Glenn.Moyer@tucsonaz.gov).

Sincerely,

  
Ernie Duarte  
Director

Attachment: IPP approval letter dated March 26, 2012

C: Donovan Durband, ParkWise

S: T13SA00055 iron horse ipp decision letter c.doc