



117 E. Louisa St. #1  
Seattle, WA 98102-3278

June 28, 2012

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**RE: PROJECT PROPOSED AT 2371 FRANKLIN AVE. E. (Project # 6310638)**

To the DPD director and others responsible for review and action on project applications:

We are writing to express our concerns regarding the proposed development of a large “aPodment,” building apparently proposed for one lot at 2371 Franklin Avenue E. We understand that it would consist of 43 bedroom units with no on-site parking. Following are concerns we have regarding the proposal:

- **Parking:** The 2300 block of Franklin Ave. E. has one of the tightest parking situations we know of anywhere outside downtown. Despite the existence of a Residential Parking Zone, parking on Franklin is especially tight because (1) the next streets west are Eastlake Avenue (which has a peak-period parking restriction in both directions that prevents day-long parking) and Yale, Minor, and Fairview Avenues E. (where parking is almost as tight as on Franklin); (2) further west is Lake Union, which of course has no on-street parking (because it has no streets!); (3) the next street east is Boylston Avenue E. which has very little on-street parking because of its narrowness, the many driveways, and because on most of its length here is no parking on the east side; (4) east of Boylston Ave. E. is Interstate 5, an effective barrier for access to the small amount of parking on the other side of the freeway; (5) on Eastlake Avenue E., many office buildings do not provide enough parking for their tenants, and these tenants utilize parking on nearby residential streets, including the 2300 block of Franklin Ave E.; (6) Many teachers, staff, and parents from the nearby TOPS K-8 public school utilize the Franklin Ave. E. for parking; and (7) the school bus loading zone is located on the north side of nearby E. Louisa Street, precluding day-long parking by residents or businesses.

Adding a 43-unit apartment building to the block without any on-site parking will unacceptably worsen an already difficult parking situation, posing new problems for current residents, as well as school buses, and employees of TOPS public school and the nearby

businesses, especially retail and restaurant businesses that cannot survive unless their customers can find some short-term parking on Franklin Ave. and other neighborhood streets. The added congestion also poses a concern to students who attend TOPS.

Normally, the Land Use Code would require parking for this project whether it is to be considered a multifamily residential use or a congregate residence. In this case, it appears that no parking may be proposed on the claim that the project is within 1320 feet of a street with frequent transit service. However, we do not believe that the available transit service meets this standard. **We ask that DPD prepare and share with us a detailed analysis as to whether the project is actually within a quarter mile of a street with frequent transit service.** As prescribed by the Land Use Code, the 1320-foot maximum distance is measured by the “walking distance from the nearest transit stop to the lot line of the lot containing the residential use,” and a street can qualify as having frequent transit service only if it has “transit service headways in at least one direction of 15 minutes or less for at least 12 hours per day, 6 days per week, and transit service headways of 30 minutes or less for at least 18 hours every day.” **Please note that the Land Use Code is very explicit about the headways and does not provide for any averaging of the headways.**  
**Reference: SMC 23.54.015 Table B, Section II, Line M and 23.84A.038 “T”.**

- **Question of whether the project has 43 bedrooms or 43 units.** From what we understand of the project, it does not appear that the "bedrooms" in this project correctly qualify as 43 bedrooms or are they 43 units, far exceeding the number of units allowed at the site. **Please explain the basis and conclusions of your analysis in light of the 1983 Director's Rule that provides direction on the features and characteristics that define a space as a unit.**
- **Architectural Integrity:** This proposed building grossly violates many of the Eastlake Community Design Guidelines that were laid out in the 1998 Eastlake Neighborhood Plan. One such guideline emphasizes preserving the architectural and historic integrity of the neighborhood. Tearing down a 100-year-old Craftsman home with no public notice or review and with no input from neighboring residents goes against this guideline. Furthermore, this historic home will be replaced with a large block style apartment building that does little to enhance the architectural integrity of the neighborhood. If the current home at the site cannot be preserved, the neighborhood guidelines outline the appropriate type of development that should replace the home.
- **Building Height and View Preservation:** The Eastlake Community Design Guidelines also address building height and view preservation. The proposed 43-unit structure will be taller than most buildings located on this block and may violate this design guideline. Because there was no opportunity for the public to review the proposed development, we are unclear as to how tall this building will be but we request the opportunity to comment on its height to ensure that it fits within our neighborhood guideline. In addition, height can also interfere with views from other lots and from the street and sidewalk. The design guideline lays out ways in which view preservation can be maintained and we request that any development follow this guideline.

- **Residential Growth:** The Eastlake neighborhood has consistently exceeded its Comprehensive Plan targets for residential growth, and there is no land use justification for development regulations and “loophole” projects, such as the one at 2371 Franklin, that would significantly increase Eastlake’s population beyond that anticipated in the Plan. Typically, multifamily development on this lot would have yielded 5 to 6 units with 1 to 3 bedrooms each. Its population would be anywhere from 10 to a maximum of 18 people. At 43 occupants, the proposed project would greatly exceed the density of any other building in the Eastlake neighborhood. The ECC cannot recall any environmental review of our neighborhood plan, the Comp Plan or Land Use Code changes that disclosed the impacts associated with this magnitude of density and its related negative significant impacts on parking, use of recreational spaces, utilities and other aspects of the community and environment.

The Eastlake Community Council requests that this project not be fast tracked. We request that DPD allow neighborhood residents and businesses, especially the residents of the 2300 block of Franklin Ave. E. If there is a place in Eastlake for such a project, it is certain not so close to a public school or on a street that already is among the most tightly parked anywhere outside downtown.

Please allow the neighborhood the time to work with the developer to save the house and/or work out a building design that is compatible with neighborhood design guidelines and the extraordinarily tight parking conditions. The above letter was authorized at the June 20 ECC board meeting. In view of the urgency of this situation and the great public concern about the project, please respond quickly and fully to our letter

Sincerely,



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cc: Mayor  
Members of the City Council  
Seattle Planning Commission