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September 9, 2015

Mr. Mark Torpey, Chair  
Saratoga Springs Planning Board  
City Hall  
474 Broadway  
Saratoga Springs, NY 12866

Dear Mr. Torpey:

**RE: CITY CENTER PARKING STRUCTURE SUBDIVISION PLAN**

Sustainable Saratoga is a not-for-profit organization that promotes sustainable practices and advocates for smart growth land use principals and procedures. We have monitored this project for more than two years and have supported mixed use, higher intensity development for this site. We recognize the need for additional parking for the City Center and the downtown but we oppose this particular project because it fails to comply with the existing standards in the zoning ordinance.

About a year ago we submitted comments relating to the subdivision plan for the City Center Parking Garage. We feel those comments are still relevant today.

**SUBDIVISION PLAN DOES NOT ACCOMMODATE LINER BUILDINGS:**

Since 2003, Saratoga Springs' zoning ordinance has had a guideline that encourages liner buildings for downtown parking garages. Article 3.1.2D.1 states:

“Parking structures should be set back 50 feet from property line of all adjacent streets to reserve room for liner buildings. If no liner building is constructed in conjunction with construction of the parking structure, the yard should provide publicly accessible civic space.”

Ideally, full height buildings should line the street frontage of parking structures. Ground floor commercial activity is critical. It is possible that the upper floors could have parking or residential uses. The greater the ratio of active land uses to accessory parking, the more activity the downtown will enjoy. Downtowns with higher ratios of parking tend to serve the interests of visitors and commuters, at the expense of people who live in the city and who prefer a walking and bike-friendly live-work-play environment.

Liner buildings for parking facilities are an important feature that should be taken seriously in Saratoga Springs. Small shops along the first floor frontage of the Woodlawn Avenue parking structure would have been a big asset to the downtown – they may have even stimulated the redevelopment of the block across the street. Liner buildings along both High Rock Avenue and Maple Avenue should be considered for the proposed City Center parking structure. The City could lease out the construction and management of the new commercial spaces. It is too good of an economic opportunity to miss, and there is enough land to accommodate a mix of uses. Existing retail locations on High Rock Avenue and Maple Avenue could benefit from additional economic activity, but they could become less attractive if a large new parking garage disrupts sightlines and pedestrian connections to other parts of downtown, without stimulating other activity.

If your board chooses not to require liner building for this parking structure, you should articulate why it is in the public interest not to do so.

**SUBDIVISION PLAN FAILS TO MEET PERITMETER BLOCK LENGTH STANDANDS:**

The City Zoning Ordinance also states in Article 3.1.2A:

“Street networks should create blocks with a maximum perimeter of 1,200 feet in T-6 zone.”

The existing city block that this proposed parking structure will sit upon is already about 7,000 feet. This is nearly 6 times the standard and is difficult for pedestrians to navigate.

If Ellsworth Jones Place were extended as a public street to High Rock Avenue, the new block perimeter would be about 1,600 feet – slightly larger than the recommended standard. The parking structure could easily be located to the north of this new connecting road. The area to the south could temporarily remain a public surface lot or be reserved for future expansion of the City Center or other private or public development

Shorter block lengths and a new connector road would have many advantages. It would greatly improve the traffic flow to and from the City Center and make the entire neighborhood more pedestrian friendly.

The design of the new street should comply with the City’s Complete Streets policy.

If your board chooses not to require this street extension, or at least a provision for its future construction, you should articulate why it is in the public interest not to do so.

**SUBDIVISON PLAN HAS BEEN DESIGNED FOR THE BUILDING AND NOT THE REST OF THE BLOCK:**

The boundary line between parcel 1 and parcel 2 has been draw only to accommodate the specific design for the parking structure. The indentation in the line is only to accommodate a stairwell for the parking structure. The subdivision line should be designed to maximize development of the entire site. This new property line will make it more difficult for a zoning-compliant future building on parcel 1.

We appreciate the opportunity to provide these comments on this important project.

Respectfully,

Harry Moran, Chair

cc: Mark Baker, City Center Authority President