



**Snohomish County
Planning and Development Services**

John Lovick
County Executive

Clay White, Director
3000 Rockefeller Avenue M/S #604
Everett, WA 98201-4046
(425) 388-3311 FAX (425) 388-3832

May 27, 2015

Kirk Harris
David Evans and Associates, Inc.
415 118th Avenue SE
Bellevue, WA 98005

Subject: Point Wells Transportation Analysis Methods and Assumptions

Dear Mr. Harris,

Thank you for the memo on Transportation Analysis Methods and Assumptions dated April 17, 2015 (Assumptions Memo), regarding the Point Wells Mixed-Use Development Project. These assumptions are foundational pieces for the Environmental Impact Statement (EIS) work currently underway, and we appreciate the need to set reasonable expectations now in order to ensure the durability of traffic analysis in light of the requirements under the State Environmental Policy Act (SEPA), chapter 43.21C RCW. As you know, the EIS must reflect both the project permit applications and the pertinent Snohomish County code requirements.

There are several areas where we have questions requiring additional documentation or revision to the Assumptions Memo before we can agree on what assumptions to use. Summarizing these questions into themes in roughly descending order of priority:

1. Characterization of Point Wells as meeting the regional growth center criteria
2. Transit ridership assumptions
3. Internal capture assumptions
4. Secondary access
5. Use of Senior Adult Housing rather than High-Rise Residential Condominium
6. Status of the corridor study with the City of Shoreline
7. Minor questions and issues in need of clarification

1. Point Wells and Regional Growth Center (RGC) Criteria

Puget Sound Regional Council (PSRC) is the adopting entity for the Regional Growth Strategy (RGS) that designates Regional Growth Centers (RGCs) in its Vision 2040 plan. The Assumptions Memo states, “While the Point Wells Project is not currently included in the list of RGC’s in the PSRC Guidance Paper,¹ it meets the criteria for a new RGC designation.” Our interpretation of the guidance paper is different; we do not believe that Point Wells meets the criteria for designation by PSRC as an RGC. This is important because the basis for assumptions regarding mode splits and internal trip capture in the Assumptions Memo rely, in part, on comparisons between Point Wells and RGCs. If Point Wells does not qualify as an RGC, it is difficult to explain the assumptions that levels of transit ridership and internally captured trips would be equivalent to what may take place in RGCs.

A second issue with assuming that Point Wells will become an RGC is that it presupposes actions that are not part of the permit applications for Points Wells or other currently pending actions. SEPA requires the County to prepare an EIS that is “based upon policies identified by the appropriate governmental authority and incorporated into regulations, plans, or codes which are formally designated” by Snohomish County and other applicable agencies as possible bases for the exercise of SEPA ([RCW 43.21C.060](#)). An RGC designation and accompanying regional commitment to support transit to the site may be a mitigation measure to reduce traffic generated by Point Wells, but a speculative assumption about an RGC designation does not meet the “incorporated into regulations, plans, or codes” test cited above. For the EIS, we must evaluate “probable significant, adverse environmental impact[s]” ([RCW 43.21C.031](#)) of the proposal rather than what the impact might be if certain yet-to-be-requested mitigation measures are assumed as having already happened.

In order to use a hypothetical RGC designation in the transportation assumptions, SEPA requires that the substantive decisions and recommendations must be clearly identifiable ([RCW 43.21C.031](#)). Procedurally, an RGC designation would require the following basic steps:

- a) Snohomish County to identify Point Wells as a candidate for RGC designation in our comprehensive plan;
- b) Snohomish County Tomorrow (SCT), an association of County and city governments, to recommend changes to the Countywide Planning Policies in support of an RGC designation;
- c) The Snohomish County Council to adopt SCT’s recommendation;
- d) The Snohomish County Council to pass a resolution requesting PSRC to designate Point Wells as an RGC and authorizing the County staff to submit an application;
- e) The Executive Board of PSRC to designate Point Wells as an RGC.²

¹ *Growth Targets and Mode Split Goals for Regional Centers* (A PSRC Guidance Paper, July 2014) available at: <http://www.psrc.org/assets/11659/Guidance-Centers-Target-Mode-Split.pdf>

² *Designation Procedures for New Regional Growth and Manufacturing Industrial Centers* (Adopted by the Puget Sound Regional Council Executive Board, September 22, 2011) available at: <http://www.psrc.org/assets/6128/CentersDesignationProcedures.pdf>

Per the *Designation Procedures for New Regional Growth and Manufacturing Industrial Centers*, in order for the Executive Board to approve the request for RGC designation, Point Wells would need to meet PSRC's criteria for eligibility. According to the procedures, proponents would need to:

- a) Demonstrate a "history of, and collaborative agreement regarding, joint planning and service provision, as well as joint plans for annexation or incorporation" (page RGC-1), which are steps that have only partially begun.
- b) Demonstrate a "minimum **existing activity level** (population + employment) of at least 18 activity units per gross acre ... before regional designation can be pursued" (page RGC-3, bold in original). For the 61-acre Point Wells site, this would require an activity level of 1,098, which is far more than the existing employment at the site. However, Point Wells would begin to meet this criterion around the time of full occupancy of its first phase under the Urban Center Alternative or part way into the second phase in the Urban Village Alternative.
- c) Show that Point Wells achieves a "minimum **target activity level** of 45 activity units per gross acre" (page RGC-3, bold in original). The Assumptions Memo does a good job of describing how the Urban Center Alternative meets this criterion (with 110 activity units) but the memo needs rephrasing with respect to this criterion on page 10 where it describes target activity level as a "principal measure for designation of a new RGC." We think that this overstates the case because target activity level is actually just one of the requirements.
- d) Meet several other harder to quantify, but potentially less challenging, requirements per the PSRC designation procedures.

In short, the Assumptions Memo needs revision regarding RGC designation. For purpose of EIS traffic estimates, it is premature for Point Wells to count on the benefits of having an RGC designation. However, pursuit and possible achievement of such a designation may be one mitigation measure identified in the EIS to help attract funding for transit that would partially alleviate the likely traffic associated with the project.

2. Transit Ridership Assumptions

The Assumptions Memo (pages 10-11) makes comparisons between Point Wells, Lynnwood Town Center (an existing RGC), and overall RGC averages and expectations. It uses these comparisons to argue for 7% transit ridership in Phase I of both the Urban Center Alternative and the Urban Village Alternative, rising to 22% and 19% respectively, upon completion of Phase IV. This reasoning does not meet the probable impacts under existing planning requirements of SEPA for two reasons. One, as described above, is that it is premature to consider Point Wells an RGC; therefore, the comparison is invalid. The other reason being that transit ridership assumptions at Point Wells need to reflect probable levels of transit service.

Section 2.6 of the Assumptions Memo addresses the need to inventory information on existing transit services and facilities. This information must also include information on the adopted long-range plans for Community Transit, Metro Transit, and Sound Transit. These plans will

then form the basis for transit ridership assumptions. The EIS for Point Wells can only assume those transit improvements that these three agencies are already planning to provide. Probable transit ridership must then be commensurate with the planning of these agencies.

Section 2.6 must also provide an evaluation of access to public transportation consistent with *former* Snohomish County Code (SCC) 30.34A.085. Even though this part of our code is no longer in effect, it was in effect when Planning and Development Services received the proposed urban center development on March 4, 2011. Former SCC 30.34A.085 is therefore the standard for evaluation of the Point Wells proposal.³

The EIS might identify steps to increase transit beyond the levels currently planned for by the transit agencies as potential mitigation steps to address traffic generated by the project. Such steps should include commitments between the project applicant and affected transit agencies. The EIS might also identify other mechanisms, consistent with SCC 30.34A.085 (3), to increase access to public transportation in the mitigation measures. Mitigation steps relying on these other mechanisms must identify ways to ensure ongoing provision of such mechanisms. The attached June 15, 2011, memo from Erik Olson, Transportation Specialist for Snohomish County Public Works, makes this point with respect to the Sound Transit station/stop and bus transit station shown within the boundaries of the project. This memo states that, “agreements must be in place and must indicate when service will be available and what improvements are needed to be provided by the project, to ensure that service can and will be provided.” Snohomish County’s perspective on this matter has not changed. The EIS may identify speculative transit improvements as possible mitigation measures, but improvements without commitments cannot be an assumption used to reduce the probable project impacts.

³ The language from *former* SCC 30.34A.085 that applies to Point Wells reads:

30.34A.085 Access to public transportation

Business or residential buildings within an urban center either:

(1) Shall be constructed within one-half mile of existing or planned stops or stations for high capacity transit routes such as light rail or commuter rails lines or regional express bus routes or transit corridors that contain multiple bus routes;

(2) Shall provide for new stops or stations for such high capacity transit routes or transit corridors within on-half mile of any business or residence and coordinate with transit providers to assure use of the new stops or stations; or

(3) Shall provide a mechanism such as van pools or other similar means of transporting people on a regular schedule in high occupancy vehicles to operational stops or stations for high occupancy transit. (Ordinance 09-079, page 62)

Adoption of this language took place by Amended Ordinance 09-079 on May 12, 2010. The repeal of the language was under Amended Ordinance 12-069 on October 17, 2012 (Section 7, page 6). The effective date for these ordinances was May 29, 2010 to November 10, 2012, respectively.

Ordinance 09-079 is available at: <http://www.codepublishing.com/wa/snohomishcounty/html/ords/2009/Ord%2009-079.pdf>

Ordinance 12-069 is available at: <http://www.codepublishing.com/wa/snohomishcounty/html/ords/2012/Ord%2012-069.pdf>

As the June 15, 2011 memo explains, subsections (2) and (3) apply to the Point Wells project. The memo further explains that Rule 4227 is the Rule on Transit Compatibility and that certain calculations must be updated to reflect the gross density of employees per acre according to section 4227.030(2)(c). Additionally, “agreements with the respective [transit] agencies must be in place and must indicate when service will be available and what improvements are needed to be provided by the project, to ensure that service can and will be provided” before Snohomish County can recognize that the project meets the transit compatibility requirements of Rule 4227. Please provide additional details on the car/vanpool plans, proposed shuttle service, and entities responsible for providing such means of transporting people as requested in the June 15, 2011 memo.

3. Internal Capture Assumptions

The Assumptions Memo says that, “Gross trip generation will be adjusted to account for internalization for each land use alternative” and that internalization adjustments “will be calculated following the National Cooperative Highway Research Program Report 684 (NCHRP 684)” (page 9).⁴ We concur with these statements as far as they go, but before we agree on the specific assumptions that the EIS will use, we will need to see additional detail and supporting rationale for the internal capture calculations.

As noted by Scott Rodman, Assistant Development Services Engineer for the Washington State Department of Transportation, in a memo from April 8, 2011, the “38.8% internalized reduction (internal captured trips) is too high and unrealistic for the scale and location of the project... Internalization reduction rates need to be documented and justified.” The 38.8% figure refers to a March 2011 report titled *Point Wells Expanded Traffic Impact Analysis* (2011 ETIA), prepared for BSRE Point Wells, LP, by David Evans and Associates, Inc. The 2011 ETIA report was prepared for the project applicant and uses several unsupported assumptions for internal capture that greatly exceed the base assumptions in NCHRP 684 (see especially pages 93-94 of the 2011 ETIA). New assumptions in for the EIS are necessary, and the basis for these assumptions must be the latest version⁵ of the NCHRP 684 model. (NCHRP has made a new version of the spreadsheet model available since the 2011 ETIA.)

When documenting the assumptions for use in the EIS per the latest model for NCHRP 684, the final Assumptions Memo must detail the information requested by Mark Brown, Engineer III, PDS, in a June 7, 2011, memo. Among other things, the June 7, 2011 memo requires a comparison between Point Wells and the sites studied for NCHRP 684 relating to “use, size, location, surrounding businesses/residential” uses. Large mixed-use developments such as the Point Wells proposal do capture trips internally, but the assumptions used for internal trip capture must be well documented and stand up to SEPA test of evaluating “probable significant, adverse impacts.” Questions raised with respect to the 2011 ETIA suggest that the assumptions in that study do not meet this threshold.

⁴ The National Cooperative Highway Research Program Report 684 is available at: http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_684.pdf.

⁵ The latest version of this spreadsheet model is available at: http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_684.xlsx.

In addition to the broad questions about the internal capture assumptions described above, we are also requesting additional description or changes in the Assumptions Memo that would address questions we have relating to internal capture:

- a) How will the “weighted average distances based on land use sizes” (page 11) actually be calculated and what modes of internal transportation are assumed? For instance, the homes in the North Village, Phase IV, are somewhat removed from the commercial services in phases I-III. Will people walk to these services on a rainy day? The project application does not provide sufficient parking in the commercial areas for employees who are likely to live offsite, let-alone parking for internally captured car trips.
- b) Compared to the Point Wells proposal, how many units at the sites studied in Texas and Florida for NCHPR 684 were restricted to senior housing? Relative to other multi-phase local projects, Point Wells proposes a high percentage of senior-only housing. We want to be sure that the internal capture rates at Point Wells make a reasonable assumption to account for the relatively high level of people who cannot or would choose not to walk great distances. In order to bolster the case for internally captured trips, the EIS may need to identify steps, such as covered walkways or on-site shuttle service, to encourage alternatives to driving when the demographics are not particularly favorable to walking.
- c) The text and tables in the Assumptions Memo refer to uses such as hotels and cinema/entertainment that are not part of the Point Wells proposal. We assume that these appear because they are part of the NCHPR 684 model, but the reason for mentioning them in the Assumptions Memo is unclear. Consider removing them to help simplify the memo.

4. Secondary Access

With respect to access, review of the Point Wells application is per the Engineering and Development Standards, 2010 Edition (EDDS for short).⁶ Section 3-01(B)(5) of EDDS requires that a “road serving more than 250 ADT [Average Daily Trips] shall be connected in at least two locations with another road or roads that meet the applicable standard(s) for the resulting traffic volume.” Traffic from Point Wells will exceed this threshold. Section 1-05 of EDDS allows a project applicant to request a deviation from EDDS from the County Engineer. The engineer will consider deviations and, if the request meets certain criteria, may approve the deviation. However, the project applicant has yet to request such a deviation. Therefore, the EIS must evaluate the Point Wells proposal per Section 3-01(B)(5) of EDDS. In other words, the EIS must assume the construction of a full secondary access. Accordingly, the trip distribution must show this.

For modeling purposes, assume that the second access connects to Woodway Park Road via 238th Street Southwest.

It is possible that the environmental impacts of constructing a second public access road will be considerable. Therefore, the traffic modeling may include a scenario assuming that the secondary access is for emergency vehicles only. This would be as a step to mitigate the impacts of

⁶ The 2010 Version of EDDS is available at <http://snohomishcountywa.gov/DocumentCenter/View/12694>.

constructing a public second access. However, this would then redistribute trips from the project site onto the primary access road.⁷

5. Use of Senior Adult Housing rather than High-Rise Residential Condominium

The Assumptions Memo states for both the Urban Center and the Urban Village alternatives, saying that it “is anticipated that many of the residents may be 55 plus and semi-retired and could live in designated senior housing units or unrestricted market units” (pages 6 and 8, respectively). This statement is insufficient to justify some of the key assumptions about traffic generation. First, for any luxury condominium project, it is likely that many residents may be 55 plus and semi-retired. This is an apt description for many, if not most, buyers of such condos. The issue is the translation of this into land use assumptions and traffic estimates.

According to the Institute of Transportation Engineers (ITE) High-Rise Residential Condominiums (Land Use Code 232) generate nearly twice as many trips as Senior Adult Housing, Attached (ITE Land Use Code 252). Hence, the proposal in the Assumptions Memo to use Land Use Code (LUC) 232 for 1,100 units in the Urban Center alternative (36% of the 3,081 total units) and LUC 232 for 978 units in the Urban Village alternative (38% of the 2,600 total units) bear close scrutiny and would require strong support. The statement that residents may be semi-retired is insufficient justification.

The changing share of senior-only units further complicates the matter. For instance, the 2011 ETIA gives the total number of Senior Adult Housing units as 317 for the Urban Center Alternative, or less than 1/3 of what the Assumptions Memo suggests (page 6).⁸ The Point Wells project application does not provide enough detail for us to make a determination on the relative share of age-restricted and unrestricted market units.

In a Review Completion Letter to the applicant dated April 12, 2013, Darryl Eastin (now retired, and who was then the project manager for Snohomish County) requested a project data table containing details on information for each building (pages 2-3). We have yet to receive the requested data table. Therefore, we cannot authorize traffic assumptions counting on any age-restricted units until the applicant provides information clarifying the tenure-by-building matter. Such with supplemental information from the applicant is required to proceed. It must also describe the mechanism to ensure the age restriction.

⁷ While not an EIS issue in one sense, SCC 30.24.020(2) states, “A private road, drive aisle or shared driveway may not make a direct, in-line connection between two sections of public road.” If the secondary access is a public road, then there may not be a private road section connecting it to the primary access. This means that one of two things would need to happen. One option is that some of the private road shown in the Point Wells project application would need revision to appear as public road before final project approval. The second option is that the applicant would need to submit a variance request to continue with the private road connection and Snohomish County would need to approve this request.

⁸ The numbers in the Assumptions Memo do not add up: Table 2 (page 6) says that the senior unit counts would be 53 in Phase I, 147 in Phase II, 96 in Phase III, and zero in Phase IV; this adds up to 296 rather than the 317 figure in the Total column.

As an alternative to the above data request, all of the tower units may be modeled as Land Use Code 232 and the low-rise units as Land Use Code 233 (Luxury Condo/Townhouse). The EIS could then identify measures such as age-restricted covenants as one possible mitigation measure to reduce the traffic impacts of the project.

6. Status of the Corridor Study with the City of Shoreline

Page 3 of the Assumptions Memo refers to a Memorandum of Understanding (MOU) regarding a Richmond Beach Corridor Study entered into by the applicant, BSRE Point Wells, LP, and the City of Shoreline. This MOU does not bind Snohomish County in its EIS process. While the EIS and the corridor study for the MOU might share some common methodological assumptions, the Assumptions Memo for the EIS needs to clarify that the corridor study is a possible piece of information, but that it is not the same as the EIS. Besides, the corridor study may or may not be complete when Draft EIS (DEIS) becomes available.

The Assumptions Memo needs to clarify that Snohomish County is not bound to the MOU and that the corridor study might help inform the mitigation steps identified by the EIS, but that there is no requirement for this to be the case. Please also add the MOU as an attachment to the Assumptions Memo.

7. Minor questions and issues in need of clarification

- a. Date of SEPA: Per prior communications, extend the EIS period to 2035 rather than 2030 (first appearance on page 5).
- b. Fitness Center Assumption: Tables 1 and 2 (pages 7 & 8) assume that the health/fitness club on site will generate no traffic because it will open to residents only. Such clubs will still have a handful of employees and personal trainers who do not live on site and the Assumptions Memo should reflect this. Please revise both tables to assume that 5% of the health club trips will be by non-residents; the Assumptions Memo may discount the remaining 95% for internal capture.
- c. Uses not in proposal (starting on page 9): The text and Tables 3 & 4 mention uses that are not part of the Point Well proposal. These are cinema/entertainment and hotel. We assume that this is because these uses are a part of the NCHPR 684 model; however, there is no need to mention them in the Assumptions Memo because they will have no effect on traffic and internal capture at Point Wells.
- d. Mode Split Assumptions: Please explain why the mode of AM entering trips and PM exiting trips are not reciprocal by mode type. For instance, if 1% of the office trips enter by transit in the morning, why assume that 0% leave by transit in the PM? This pattern repeats for several uses and modes in Tables 3 and 4.
- e. Table 5 on page 11 will need updating to reflect new assumptions in the absence of regional growth center comparisons.
- f. Page 11: What does the use of “weighted average distances based on the land use sizes” mean? Explain this in terms of distances between buildings and internal road structure.

- g. Page 12: Part of the following sentence needs clarification: “The project-generated trips were consistent with the trips estimated using ITE trip generation methodology, *including project trip internalization*” (italics added). Was the tool to estimate internalization NCHRP 684 or an ITE methodology?
- h. Page 12: What is meant by a “special matrix was added in order to capture some light-rail station traffic” near the station at I-5? The Assumptions Memo needs to clarify the source and use of this matrix.
- i. Page 13: Please clarify the following sentence: “The bicycle and pedestrian counts will be used in the future condition.” Our understanding is that current counts will be scaled up at an annual rate of 0.25% to account for background growth. (This issue also appears in Attachment C.)
- j. Page 13: Elaborate on “Consideration” as in “Consideration will be given on the ability of adding more transit services/rail services to the project study.” How does this tie back to the Transit and Rail Services inventory in 2.6 and possible mitigation measures for traffic generated by the project.
- k. Attachments A and B: Update these to include one additional intersection for study at Woodway Park Road and Wachusett Road (in Woodway).
- l. The Assumptions Memo also needs to add the publicly accessible park as a use on site and as a traffic generator, per a memo from Mark Brown, dated June 7, 2011, that is attached to the project completion letter.

Respectfully,



Ryan Countryman, Principal Planner
Snohomish County Planning and Development

Copy:
Gretchen Brunner
Gary Huff
Tom Rowe
Rich Shipanski
Clay White