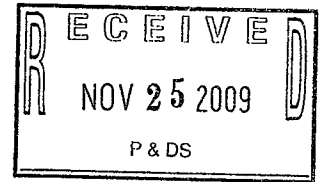


To: Miranda Redinger, City of Shoreline

November 25, 2009

From: Donald W. Ding  
110 NW 171<sup>st</sup> ST.  
Shoreline, WA 98177-3613



RE: Draft SEIS Point Wells Subarea Plan and Pre-annexation Zoning

Thank you for the opportunity to comment on the DSEIS.

I live at 110 NW 171<sup>st</sup> St., City of Shoreline, and have been a resident there for 33 years. My sons both graduated from the Shoreline School District and my spouse has worked at Shoreline Community College for 20 years. During my career I worked for 35 years as a transportation planner on a diverse variety of transportation projects including the review of development proposals and transportation impacts for King County. Some of the major projects I participated on were the Bear Creek Urban Planned Developments (Redmond Ridge and Trilogy), a fully contained community development east of Redmond consisting of 4700 mixed family dwelling units, Klahanie and Issaquah Highlands. I also worked on multimodal projects, growth management, a variety of community plans and transportation capital projects.

I am concerned about the level of development at Pt. Wells and the impacts it will have on surrounding neighborhoods. Growth should be allowed when it is consistent with adopted policies (at regional and local levels) and is appropriately scaled and does not adversely impact the environment and community. If it is to occur, it should be done with sensitivity to the environment and affected neighborhoods and with mitigation to minimize negative impacts.

Upon reviewing the DSEIS and traffic study, I would like to have the following comments addressed. Some reference is made in comparison with information from the Snohomish County traffic study.

**1. Growth and consistency with adopted plans**

Is the proposal consistent with growth plans, as prescribed by the Washington State Growth Management Act (GMA), growth policies of the Puget Sound Regional Council as set forth in Multi-County Planning Policies, King County Countywide Planning Policies, The Shoreline Comprehensive Plan, and neighborhood plans? Is the proposal consistent with the growth targets of the City? Do we need to accommodate the additional growth created by Pt. Wells? If not, there should be a lesser mandate and greater scrutiny in seeking more growth. Does the City have level-of-service standards (RCW 36.70A.070(6)(a)) for transportation that apply and have impacts on State facilities (including SR-99, SR-104 and I-5) (RCW 36.70A.070(6)(a)) been identified and mitigated?

**2. Transportation and traffic impacts**

a. The trip generation rates in the DSEIS, table page 7 appear to be inconsistent with the Institute of Transportation Engineers (ITE) Trip Generation Manual, 7<sup>th</sup> Edition, Land Use Code 230.

Trip generation rates appear to be significantly lower than ITE. For instance, according to the DSEIS table, 500 residential units generate only 195 p.m. peak entering/exiting trips while, based on the ITE manual, 500 units at 5.81 trips daily and 0.52 p.m. peak hour trips per dwelling unit would produce (500x5.81=2905 daily trips) 260 p.m. peak period trips (500x0.52). There is a discrepancy of 65 peak hour trips representing an underestimation of 33%. This significantly worsens with larger phases of development.

The following table compares trip generation rates based on calculations from the ITE Trip Generation Manual, 8<sup>th</sup> edition for only the residential trips. This illustrates the discrepancy in trip generation numbers between the DSEIS and direct calculations from the Manual. If there are undocumented assumptions used in the DSEIS, they should be included. Additionally, little information was included in the DSEIS for the office/retail use, aside from the number of total employees. Additional information should be provided on trip generation for the office/retail use (which may be similarly low.)

Comparison of Trip Generation based on ITE 8<sup>th</sup> edition (0.52 trips/unit, 64% entering/36% exiting) vs. DSEIS-P.M. Peak Hour of Generator- **Are DSEIS trips too low?**

Res. Units	ITE-8 <sup>th</sup> Edition Total Pk. Trips	DSEIS Total Pk. Trips	ITE-8 <sup>th</sup> Edition Entering Trips	DSEIS Entering Trips	ITE 8 <sup>th</sup> Edition Exiting Trips	DSEIS Exiting Trips
500	260	195	166	131	94	64
1000	520	345	333	231	187	114
1500	780	481	499	322	281	159
2000	1040	608	666	408	374	200
2500	1300	730	832	489	468	241
3000	1560	848	998	568	562	280
3500	1820	899	1165	602	655	297
4000	2080	963	1331	645	749	318

Comparing the ITE 8<sup>th</sup> edition trips to the DSEIS shows a significant discrepancy in total peak hour trips ranging from 33% (260 vs.195 trips) more trips for 500 units to 102% (1820 vs. 899 trips) more trips for 3500 units. This creates a significant difference and becomes very meaningful when analyzing trip impacts. **Thus, all the traffic impact analysis may be very low.**

There is also an inconsistency between the DSEIS table and the Snohomish County table for the last two values for residential units (3500 and 4000 units vs. 3220 and 3500 respectively.) Other numbers are the same, so it appears a typo problem may have occurred.

b. The trip distribution is not discussed in the DSEIS- concern for traffic diverting through neighborhoods using other streets. Trip diversion from Richmond Beach Rd./185<sup>th</sup> should be analyzed and mitigated. Just because trips divert from Richmond Beach Rd./185<sup>th</sup> does not mean their impacts should be discounted. There is a varying degree in the level of divergence trips

between the City (40%) and Snohomish County (87%) traffic analysis. Regardless of which number is used, both numbers of trip divergence indicate a significant level of Pt. Wells trips using other streets than Richmond Beach Rd./185<sup>th</sup>. Trip distribution should be included for N.205<sup>th</sup>, 185<sup>th</sup> and 175<sup>th</sup> and be extended minimally to I-5. Only a limited traffic impact assessment has been provided in the DSEIS, only for Richmond Beach Rd./185 to Aurora. Traffic analysis and mitigation should be required on other streets and corridors significantly affected by Pt. Wells traffic, including carrying the analysis of traffic to I-5.

c. The level-of-service tables appear to only have small impacts based on the proposal, which intuitively does not seem correct. If the level-of-service is already E (based on 2025 Base-Shoreline and Aurora Corridor II Traffic Study), and traffic from 500 or 1000 units are added, shouldn't the level-of-service degrade to F or worse? Additional Pt. Wells units do not worsen LOS (such as going from 500 to 1500 units, an increase of 1000 units with no significant LOS degradation.)

If capital improvements are factored into the level-of-service calculations, they should be identified.

Level-of-service should not be the critical factor to determine the adequacy of Richmond Beach Rd. (205<sup>th</sup> to 196<sup>th</sup>). Though LOS A is shown, this is not a realistic assessment of impacts to the street and neighborhood. The current road may be a collector arterial, however its function and character are more representative of a local neighborhood, cul-de-sac street. Traffic from Pt. Wells development would significantly change the character of the neighborhood.

Though the traffic analysis shows the p.m. peak to be the most severe, the traffic during the a.m. peak should also be analyzed because of the traffic levels associated with Shorewood High School and Shoreline Community College traffic.

d. The traffic analysis ends at 185<sup>th</sup> and Aurora and does not consider traffic impacts on other streets where traffic diverts from the Richmond Beach Rd./185<sup>th</sup> corridor. Snohomish County's traffic study only shows 13% of Pt. Wells traffic ending up at the Aurora/185<sup>th</sup> intersection while the City's analysis shows about 60% reaching the same intersection. If either of these are accepted, a significant part of the site traffic diverts through adjacent neighborhoods and streets, creating further uncounted and unmitigated impacts. The traffic and mitigation analysis should minimally be carried out to I-5 (including 205<sup>th</sup> and 175<sup>th</sup> interchanges) and also include traffic impacts on other streets where site traffic would divert (such as 8<sup>th</sup> NW/Carlyle Hall Rd., Dayton Ave., Fremont Ave. and Meridian Ave.) This also would be more consistent with the Growth Management Act requiring disclosure of impacts on State facilities. There is no trip ending destination at 185<sup>th</sup> /Aurora where traffic stops or disappears. The full scope of significant traffic impacts should be identified, not just for the Richmond Beach/185<sup>th</sup> corridor.

e. Is the level-of-service analysis consistent with the traffic analysis from the Aurora Corridor II Study? From initial appearances, there does not seem to be sufficient remaining capacity at key intersections (205<sup>th</sup>, 185<sup>th</sup>, 175<sup>th</sup> and possibly 145<sup>th</sup>) to keep an acceptable level-of-service E or better. Most of these intersections are already at level-of-service E before the Pt. Wells

development. Also the level-of-service tables for increments of Pt. Wells traffic show a negligible decrease in traffic at various stages of increased development. Many intersections at level-of-service E before Pt. Wells barely show any degradation with various stages of Pt. Wells development.

f. A useful tool to show the traffic impact of the Pt. Wells site would be a traffic simulation model. This could show the current traffic condition and a comparison with various stages of development at the Pt. Wells site. Examples of simulation models are SYNCRO and CORSIM. The former is used by the City. This should be applied to the Richmond Beach Rd./185<sup>th</sup> corridor as well as other neighborhood streets that are adversely impacted.

g. Any consideration for transit and transportation demand management (TDM) considerations for the Pt. Wells site should be consistent with adopted transit plans, Sound Transit plans and accepted TDM actions. If service is not included in plans, mitigation should only be applied if full, sustained funding is provided by the development and there is guaranteed certainty of use. This should also include long term certainty and sustainability. A short term, failed transit or TDM action should not be credited with permanent trip reductions. Another key factor in this is the inability to force residents to use a particular mode of travel such as transit or rail—just having service does not mean ridership will occur. Accessibility, destinations, directness and frequency help determine whether service is used. Pt. Wells residents cannot be forced to ride transit, to bicycle or to walk. Having poor service or being in a plan does not mean trips will be reduced. Measures to create greater certainty and sustainability of use should be required to allow for any trip discounting.

h. As currently shown, the Pt. Wells site would only be served by a single point of access from Richmond Beach Rd. This would pose a severe access and safety hazard if the road is blocked. Most cities and counties in the region have limitations on the number of dwelling units that can reasonably be served by a single access point. Does the City have any such restrictions in the development code?

i. Richmond Beach Rd. has some significant road geometry concerns (grades and curves) and is susceptible to the dangers of icy/snow weather. What will be the impacts of adding Pt. Wells traffic to Richmond Beach Rd. during hazardous/inclement weather conditions? How will hazardous/inclement weather affect the ability of emergency vehicles (such as fire trucks) to serve the Pt. Wells site?

j. The City has embarked on a \$100+ million project to improve the Aurora Corridor, representing a significant commitment of Federal, regional and local funding. The appropriateness of a Pt. Wells development should be carefully weighed against the working feasibility of the completed Aurora Corridor. During the Aurora Corridor II Study traffic analysis was conducted for key intersections including Aurora at 205<sup>th</sup>, 185<sup>th</sup> and 175<sup>th</sup>. For the selected 2030 “Build” Alternative, an am/pm peak hour analysis showed level-of-service E/E at 205<sup>th</sup>, E/E at 185<sup>th</sup> and E/D at 175<sup>th</sup>. This analysis did not include the level of development as proposed for the Pt. Wells sub area plan. If the Pt. Wells development was added to the Aurora Corridor traffic analysis, the Aurora Corridor levels-of-service would drop significantly below

level-of-service F. A \$100+ million project investment should not be marginalized (rendered failing in service) before it is constructed.

k. Currently the intersection of Richmond Beach Rd. and 3<sup>rd</sup> NW is the worst “accidents intersection” in the City. The high volume of Pt. Wells traffic would severely worsen the dangerous problem. This should be a factor in determining the level of safe and acceptable growth for the site.

l. Many pedestrians and bicyclists use Richmond Beach Rd./185<sup>th</sup> and neighboring streets for walking and bicycling. Important attractions include the Library, Richmond Beach Park, local parks, Einstein Middle School, King’s Schools, Shorewood High School, Shoreline Community College, St. Luke’s School, Meridian Park School, and Parkwood School. Increasing volumes of traffic will create greater safety risks and accidents. This should be a consideration when determining future levels of acceptable traffic growth and mitigation.

m. A key factor in the Pt. Wells proposal is the designation of 8250 daily vehicle trips as “the” acceptable level of new vehicle trips. Is this consistent with the City’s level-of-service standards (as prescribed by GMA in RCW 36.70A.070(6)(a))? What is the basis for the 8250 daily vehicle trips? Is one intersection with a failing level-of-service F acceptable and more than one not acceptable? Why isn’t just having one failing intersection unacceptable?

There appears to be an inconsistency between the Shoreline Model Code language, Policy PW-9, referring to a limit of 8250 daily vehicle trips and Shoreline Municipal Code 20.92.100F setting a maximum traffic limit at 8500 vehicle trips. What is the basis for this limitation? Is this established as part of the City’s transportation level-of-service standard as prescribed by the Growth Management Act?

References to 825 trips should be labeled 825 p.m. peak hour trips.

n. The Growth Management Act requires comprehensive plans (and consistent local plans) to identify the impacts of growth on State facilities. Impacts on State facilities as prescribed by RCW 36.70A.070(6)(a). Traffic impacts should be expanded to State highway facilities including SR-104, SR-99 Aurora and I-5. If Aurora intersections and I-5 interchanges fail due to the increased traffic of the proposal, this information needs to be disclosed to the State.

### **3. Protection of existing neighborhoods**

What does the City of Shoreline stand for? A common answer is the quality of life and livability of neighborhoods and communities. That’s what Seattle Magazine recognized in choosing Shoreline as the best community in 2006 and 2<sup>nd</sup> best out of 110 neighborhoods in 2009. Neighborhoods need to be improved, protected and sustained to foster desirability. Only applying a traffic level-of-service standard to Richmond Beach Rd. (205<sup>th</sup> to 196<sup>th</sup>) does not reflect a concern for traffic, safety and protection of the Richmond Beach neighborhood. Existing neighborhoods should be protected from unneeded and unmitigated growth.

#### **4. Conditions for development/level of development**

I strongly concur with the DSEIS recommendation to perform a more comprehensive and updated traffic/transportation study as part of the proposal, including the comments above.

If development goes ahead, it should be scaled to a level that least impacts existing neighborhoods and with full mitigation of adverse impacts.

Condition development based on stages with appropriate mitigation. For instance 500 units can be developed with a specific mitigation package. When completed and acceptable, the next stage can be developed and so on. This assures greater certainty of impacts/mitigation and phasing of growth.

Needed improvements should be concurrent with growth, at the time development occurs and not 6 years later (or never in the worst case.)

#### **5. Conclusions**

As a long time resident of Shoreline, I am happy with the City's services. However, one significant action can lead to a downward spiral. The City is at that step with the Pt. Wells development. How would you feel if a 3500 residential unit subdivision were proposed for development next to your home? This negatively changes the quality of neighborhoods. Are we sacrificing our neighborhoods for a bigger tax base? What is appropriate growth? It is not about more tax base-it is about quality of life. If Shoreline has a negative connotation (undesirable neighborhoods), who will want to live here? Remember Shoreline stands for its neighborhoods. Please make sure we walk the walk and not just talk the talk. One poor decision on a big development can destroy many neighborhoods (not just those directly affected by Pt. Wells, such as Richmond Beach, Richmond Highlands, and Hillwood, but also those throughout the City by creating intolerable traffic on arterial streets and I-5.)

Do we really need it? How much do we want? Protecting our existing neighborhoods should be the top priority, not out-of-scale, unmitigated growth.

A few years earlier, Seattle Magazine selected Shoreline as the best Seattle-area neighborhood. And once again in 2009, honored Shoreline as the 2<sup>nd</sup> best out of 110 neighborhoods. Will we still be able to claim such a high status if we begin destroying our neighborhoods?

I hope these comments will help make the SDEIS a better document and aid your decisionmaking.

Thank you. Donald W. Ding

