Memorandum

DATE: December 2, 2009

TO: Shoreline Planning Commission

FROM: Steve Cohn, Senior Planner

RE: Response to Donald Ding comments on Pt Wells DSEIS

Mr. Ding submitted several pages of comments relating to the Draft SEIS on the Point Wells Subarea plan and zoning. His comments were included in the December 3 Planning Commission packet. Working with staff from Public Works, we summarized specific questions from his comments, and offer responses below under general topic headings.

If you identify additional questions in Mr. Ding's letter that staff has not addressed and you believe that information would assist you, please bring them to my attention so that I can request a Public Works staff response.

1. Growth and consistency with adopted plans

- a) Is proposal consistent with growth plans, including GMA act?

 The proposed development is in Snohomish County. Snohomish County's growth targets assume mixed use development on the Point Wells site. Staff is not certain whether the Point Wells site is identified separately from other "unincorporated county" areas and has been assigned a specific growth target.
- b) Is proposal consistent with growth targets in Shoreline? Shoreline's growth targets do not include potential development of Point Wells since it is not within Shoreline's City limits.
- c) Does the City of Shoreline have LOS standards that apply? The adopted LOS standards are a minimum of LOS E at signalized intersections. Level of Service standards do not apply to Highways of Regional Significance such as Aurora Avenue (SR 99).

Shoreline is in the process of revising its Transportation Master Plan (TMP). The revision is scheduled to be completed in 2010. When a Point Wells development proposal is submitted, the impacts will be analyzed under the LOS standards that are in place at the time of submittal.

d) Have impacts on state routes been identified and mitigated?

Vehicle trips from Point Wells will be using SR 99, and therefore have some degree of impact. Mitigation for these impacts will be handled through the Aurora Corridor Improvement projects between N 165th St. and N 205th St. The projects will widen SR-99, add medians for access management, add sidewalks, and rebuild existing traffic signals with state-of-the-art equipment. These improvements will enhance traffic flow and safety on Aurora. The intersection at 185th and Aurora is scheduled for completion in Spring 2011.

2. Transportation and traffic impacts

a) The trip generation rates appear to be significantly lower than those estimated in the ITE manual.

For the purpose of reviewing the traffic impacts, City of Shoreline staff focused on the total number of trips generated instead of the exact details of the residential and retail elements that make up the total number of trips. In that regard, Shoreline's analysis differs from that of Snohomish County, which focused on traffic generation from specific land uses.

Setting a maximum limit on vehicle trips provides the future developer with some flexibility on how they ultimately choose to develop a site. A detailed traffic study will be a requirement for any future projects on the Pt. Wells site.

- b) The trip diversion from NW Richmond Beach Rd/N 185th St should be analyzed and mitigated.
 - Both the Snohomish County and City of Shoreline models recognize that some vehicles will divert to and from connecting arterials in addition to SR-99. One of the recommended mitigation is a detailed traffic study to be undertaken after a specific development plan is proposed that would identify specific transportation impacts and mitigations.
- c) The LOS tables (model run results) in the DSEIS do not intuitively seem correct. There are many variables and assumptions that make up a traffic model. The model software has a number of algorithms built in that can optimize a traffic signal system. Given the large number of variables in this model, the optimization techniques can produce different results each time it is run. The intent of a traffic study at the plan level is to provide general guidance on impacts. A more detailed analysis will occur when a specific development plan is proposed.
- d) *The traffic analysis ends at N 185th St and Aurora Ave N*. The study area for the Snohomish County SEIS (which Shoreline used as the basis for its modeling effort) was bordered on the east by SR 99, and extended both north and south of N 185th St. The more detailed study mentioned above will likely extend east to Meridian Ave N.

- e) Is the LOS analysis consistent with the Aurora Corridor II study?

 To the best extent possible, yes. However, since the traffic models used data collected at different times and project out to different time periods, the results are similar, but may not be exactly the same.
- f) A useful tool would be a traffic simulation model, such as SYNCHRO or CORSIM.
 Both the Snohomish County and Shoreline studies utilized the traffic simulation model SYNCHRO as a tool in the analysis.
- g) Transit and TDM considerations should be consistent with adopted plans. Noted. Questions about the likelihood of potential transit service and train service within the timeframe of the analysis (2025) are discussed in both the Snohomish County and City of Shoreline reports.
- h) Does the City of Shoreline have any restrictions on large developments with only one access?
 This is an issue for emergency services (fire and police) and these agencies, not the City of Shoreline, would be the appropriate agencies to provide approval. The Snohomish County Final SEIS addresses this issue.
- i) What will be the impacts of adding Pt. Wells traffic to Richmond Beach Rd.
 during inclement weather?
 NW Richmond Beach Rd. is a primary route for City of Shoreline roads crews
 during inclement weather. This means that it is one of the first roadways plowed
 and sanded in snow and icy conditions. Emergency service providers currently
 use Richmond Beach Road for access.

A review of the reported collisions from 2003-2008 showed that speed is a contributing factor in almost 50% of the incidents. Additional vehicles on the roadway can reduce overall speeds, so staff does not predict a significant change to the accident rate.

- j) If the Pt. Wells development trips are added to the Aurora corridor, the LOS at signalized intersections will drop below LOS F.
 The SEIS notes that at 825 peak pm trips, one intersection, Aurora Avenue and 205th is at LOS F. Above 825 pm peak hour trips, additional Aurora intersections fall to LOS F.
- k) The intersection of 3rd Ave NW and NW Richmond Beach Rd. will worsen due to Pt. Wells traffic. This should be a factor in determining future levels of acceptable traffic growth and mitigation.
 One of the proposed mitigation projects is the widening of this intersection to accommodate east/west left-turn pockets. This should help improve the LOS at the intersection and reduce the likelihood of accidents

 Pedestrian and bicyclists in the corridor should be considered in determining future levels of acceptable traffic growth and mitigation.
 Pedestrians and bicyclists are being considered. An example would be the project to build sidewalks on Richmond Beach Drive as part of the proposed mitigation package. In addition, Richmond Beach Drive is intended to be widened slightly which would provide additional room for bicyclists.

The proposed traffic mitigation study required prior to development will address impacts and mitigations to all modes of transportation: auto, bicycle, pedestrian and transit.

- m.1) The proposal designates 8,250 daily vehicle trips as the acceptable level of new trips. Is this consistent with the City of Shoreline LOS standards?
 It is difficult to translate daily trips to LOS standards. The analysis shows the LOS at specific intersections at various pm peak hour rates.
- m.2) What is the basis for the 8,250 daily trips?

 Reviewing the results of the City of Shoreline modeling analysis, 825 PM peak trips looked like a reasonable threshold because it appeared to be a tipping point beyond which multiple, significant intersections began to fail. Typically, the peak hour volumes are about 10% of the daily volume of traffic.
- m.3) Is one intersection with a LOS of F acceptable and more than one is not-acceptable?
 At 825 pm peak hour trips, there is only one intersection (205th and Aurora) that falls to LOS F. Shoreline's policies allow LOS F to occur on Aurora. On the other arterials, the standard is LOS E at signalized intersections.
- m.4) There is an inconsistency between Shoreline Model Code policy PW-9 and SMC 20.92.100F referring to a limit of 8,250 and 8,500 daily trips? These are draft documents. The inconsistency will be corrected.
- m.5) References to 825 trips should be labeled as 825 PM Peak hr trips. Noted.
- n) Traffic impacts should be expanded to SR-99, SR-104, and I-5. Any intersections that fail as a result of the Pt. Wells development should be disclosed to WSDOT? Both Snohomish County and City of Shoreline reports included some analysis and discussion on impacts to SR 99. Staff analysis is that I-5 and SR 104 are not significantly impacted.

Please let me know if you need any additional information.