

Countryman, Ryan

From: Tom McCormick <tommccormick@mac.com>
Sent: Wednesday, May 20, 2015 5:58 PM
To: Countryman, Ryan
Cc: Brown, Mark A.; Debbie Tarry; Nytasha Sowers; Kirk McKinley; Kendra Dedinsky; Scott MacColl
Subject: Comments on 4/17/15 draft Technical Memorandum on Transportation Analysis Methods and Assumptions for Point Wells
Attachments: MOU staff rpt Packet021113.pdf

Ryan,

Please consider the following comments and suggested revisions re the 4/17/15 draft Technical Memorandum on Transportation Analysis Methods and Assumptions for Point Wells (copy attached, with embedded remarks from City of Shoreline).

1. Page 2, Section 1.0, ¶ 2: The study area focus should not stop at N 185th Street and Aurora. Instead, it should continue east along N 185th Street to the 185th Street Light Rail Station site (see comments in next paragraph below). Extending the focus makes sense when considering not only the future 185th Street Station impacts, but also current driving routes. For example, in the peak AM hour, based on driving habits of current Richmond Beach residents, most Point Wells traffic that is en route to I-5 (a high percentage of all Point Wells peak AM traffic) will travel east via N 185th Street, across Aurora and onward east to Meridian Avenue N, turning right onto Meridian Avenue N, then left at 175th Street N., and onward to I-5.

The traffic on N. 185th Street is expected to increase significantly when the 185th Street Light Rail Station is completed, and high-density housing develops in the recently up-zoned 185th Street Subarea. Please ensure that the Study results incorporate: (1) projected trips traveling to and from the 185th Street Station via the Richmond Beach/N. 185th Street corridor; and (2) additional trips that will be generated along N. 185th Street on account of new residential units and businesses in the up-zoned high-density 185th Street corridor. With such added traffic, the City's LOS and V/C standards will fail at a lower volume of traffic than if the added traffic was ignored. NOTE: According to the EIS for the 185th Street Station, the Preferred Alternative Projected Net Increase in Population, Housing, and Employment over Current (2014) Levels is: (1) 2035 Population +2,916 to +5,399; (2) 2035 Households +1,140 to +2,190; and (3) 2035 Employees +502 to +928. Also, note that, according to the Sound Transit's Lynnwood Link Extension Final Environmental Impact Statement, the 185th Street Station will have 500 new park-and-ride spaces, and the ridership is projected to be 12,600 combined daily boardings in 2035 for the 185th Street and 145th Street Stations. These are huge numbers that must be incorporated into the Point Wells traffic study.

2. Page 2, Section 1.0, ¶ 3: As noted in previous emails that I sent to you, the Environmental Impact Statement must include a 3rd Alternative: a 90-foot maximum building height Urban Center alternative. The project does not qualify under SCC 30.34A.040(1) (2011 version) for building heights in excess of 90 feet because the project is not located near an *existing* high capacity transit route or station that provides high capacity transit access to the site.

3. Page 2, Section 1.0, ¶ 2 & 3: For each alternative, the study should present findings under two scenarios. One that assumes a single access road (Richmond Beach Drive), and another that assumes two access roads (Richmond Beach Drive, plus a second access road going through the Town of Woodway, probably via 238th Street SW). A notable shortcoming of the draft Technical Memorandum is that it fails to address a second access road scenario. A second access road is mentioned only once, and cryptically at that (at the top of page 6). Note that the 8/14/2014 Scoping Summary says, in a separate paragraph on page 6, under Conclusions/Final Scope of the EIS, that "Additionally, the EIS will evaluate the potential environmental impacts of providing a secondary access road from the Point Wells site to an existing Town of Woodway right-of-way for Alternatives 1 and 2." Also, when modeling for a secondary access, an assumption will need to be made regarding the percentage of Point Wells traffic that will use that

secondary access. What is the assumed percentage (10% or 15%). The study needs to explain how the assumed percentage was calculated or arrived at.

4. Page 3, Section 1.0, ¶ last paragraph: As noted in comment #1 above, the study area focus should not stop at N 185th Street and Aurora. Instead, it should continue east along N 185th Street to the 185th Street Light Rail Station site.

5. Page 3, Section 2.2, ¶ 1: As noted in comment #1 above, the study area focus should not stop at N 185th Street & Aurora. Instead, it should continue east along N 185th Street to the 185th Street Light Rail Station site.

6. Page 3, Section 2.2, ¶ 2: The five-year period for collision data should be updated. The five-year period should be January 2010 to December 2014. Contact the City of Shoreline for the 2014 data which was presented to the City Council earlier this year.

7. Page 3, Section 2.2, ¶ last paragraph: Intersection collision rates should be compared to the City of Shoreline's thresholds and not the so-called "typical threshold of concern (1.0 collision per million entering vehicles (MEV))." Based on the City of Shoreline's 2014 Annual traffic Report, any intersection with 5 or more collisions is considered for further review ("Nationally, locations with 5 or more correctable collisions in a 12 month period may be considered for some additional traffic control devices, such as stop signs and traffic signal revisions."). Of the 25 intersections in the City with five or more collisions, only three have collision rates of 0.50 or more, and only eight have a collision rate of 0.40 or more. The 3rd Ave NW & Richmond Beach Road intersection tops the list, at 17 collisions (rank #1) and a 0.75 collision rate (rank #2). The study needs to be revised to defer to the local jurisdiction's threshold of concern, not a general 1.0 rate. Shoreline's expressed threshold of concern is any intersection with 5 or more collisions in a 12 month period (see above). Instead of using 1.0 collision per million entering vehicles (MEV) as the study threshold, please use the following: The correct threshold of concern should be 5 or more correctable collisions in a 12 month period with a collision rate of 0.40 or more.

8. Page 3, Section 2.3, ¶ 1: With the 185th Street Station and the recent 185th Subarea up-zone (see comment #1 above), it is incorrect to assume that "the annual growth rate of 0.25 percent provided by the city of Shoreline is a reasonable growth rate to be used for the fully developed area within the city of Shoreline limits, including the SR 99 corridor." Please modify all growth rate assumptions to reflect the 185th Street Station and the recent 185th Subarea up-zone.

9. Page 4, Section 2.4, ¶ 4: Please update the signalized intersection phasing to reflect that the 3rd Ave NW & NW Richmond Beach Rd intersection has been changed to "split phase" operation (work order has issued).

10. Page 4, Section 2.4, ¶ City of Shoreline: Please use two alternatives, (1) the LOS and V/C ratio provisions in Shoreline Municipal Code 20.60.140, and (2) the LOS and V/C ratio provisions in the 4/1/2013 Memorandum of Understanding ("MOU") between the City of Shoreline and BSRE. Note that the Town of Woodway's Comprehensive Plan has an 8,250 ADT limit on its portion of Richmond Beach Drive, and the City of Shoreline's Comprehensive Plan has a 4,000 ADT limit on Richmond Beach Drive. These limits need to be addressed.

11. Page 5, Section 2.6: Hard data should be used when available. The table below, from King County Metro in May 2015, shows the average weekday boardings on Metro Routes 304 and 348 at stops in Richmond Beach in our Fall 2014 service period. These are based on samples from automatic passenger counters that are on about 20% of the buses.

Direction	Stop#	OnStreet	CrossStreet	Route 304	Route 348	Total
Eastbound	70700	NW 196th St	24th Ave NW	2	4	6
Eastbound	74785	Richmond Beach Dr NW	NW 196th Pl	n/a	7	7
Eastbound	74850	NW 195th St	20th Ave NW	8	16	24

Eastbound	74860	NW 195th St	18th Ave NW	1	0	1
Eastbound	74870	NW Richmond Beach Rd	15th Ave NW	12	48	60
Eastbound	74880	NW Richmond Beach Rd	NW 191st St	4	3	6
Eastbound	75000	NW Richmond Beach Rd	8th Ave NW	6	13	19
Westbound	75560	NW Richmond Beach Rd	8th Ave NW	1	4	5
Westbound	75570	NW Richmond Beach Rd	12th Ave NW	0	0	0
Westbound	75580	NW Richmond Beach Rd	15th Ave NW	0	1	1
Westbound	75592	NW 196th St	20th Ave NW	1	5	6
Westbound	75594	NW 196th St	NW 194th Pl	0	0	0
Westbound	75670	NW 196th St	26th Ave NW	2	8	10
Total				36	109	146

12. Page 5, Section 3.2: With the 185th Street Station and the recent 185th Subarea up-zone (see comment #1 above), it is incorrect to use a straight-line annual growth rate of 0.25% for intersections. Please modify all growth rate assumptions to reflect the significant amount of added traffic that will flow to and from the 185th Street Station and the recent 185th Subarea up-zone.

13. Page 5, Section 4.1, ¶ 1: Please ensure that the study has at least two alternative road configurations for Richmond Beach Road up to 8th Avenue NW: (1) a 3-lane road diet; (2) 4 lanes, the current design.

14. Page 6, Section 4.1, ¶ 1: Regarding "neighborhood street traffic calming," the study should present several alternatives of calming. More importantly, the study should include, as an alternative, the closing of NW 199th Street, NW 198th Street and NW 197th Street to through traffic, by closing these streets where they connect to Richmond Beach Drive.

15. Page 6, Section 4.1, ¶ 1: Section 4.1 of the Technical Memorandum contains the only mention of a secondary access road. Greater emphasis and study of a secondary access road alternative is required. Note that the 8/14/2014 Scoping Summary, in a separate paragraph on page 6, under Conclusions/Final Scope of the EIS, says that "Additionally, the EIS will evaluate the potential environmental impacts of providing a secondary access road from the Point Wells site to an existing Town of Woodway right-of-way for Alternatives 1 and 2." When modeling for a secondary access, an assumption will need to be made regarding the percentage of Point Wells traffic that will use that secondary access. What is the assumed percentage (10% or 15%), and how was it arrived at?

16. Page 6, Section 4.2.1, ¶ 2: The study must not assume that there will be "1,100 Senior Condominiums" until the developer makes a binding promise to put covenants running with the land in the deed documents, whereby the units "assumed" to be senior units can only be owned or resided in by seniors age 55+. If the developer is unwilling to make such a commitment today, then the study must address other alternatives: (1) an alternative that assumes no senior housing; and (2) an alternative that assumes whatever number of senior units that the developer can promise now to put covenants running with the land in the deed documents, whereby the units "assumed" to be senior units can only be owned or resided in by seniors age 55+.

17. Page 6, Section 4.2: A third alternative is required, a 90-foot maximum building height Urban Center alternative. See comment #2 above.

18. Page 6, Section 4.2.1, ¶ Alternative 1 – Urban Center Alternative: The high-rise units will not be possible, as the project does not qualify under SCC 30.34A.040(1) (2011 version) for building heights in excess of 90 feet, because the project is not located near an existing high capacity transit route or station that provides high capacity transit access to the site. Please revise study assumptions to assume building heights not to exceed 90 feet.

19. Page 7, Section 4.2.2, ¶ Alternative 2 – Urban Village Alternative: It should be 1,800 units, not 2,600 units. According to Addendum No. 1 to the Final Supplemental Environmental Impact Statement for "Final Docket XIII Amendments to the GMA Comprehensive Plan — Paramount of Washington, LCC (August 27, 2012), "the mix of

development used to assess impacts for the Alternative Action [(Urban Village)] includes 1,800 housing units and 20,000 square feet of retail space. In addition, trip generation was based on 375 new jobs on the Point Wells site, which equates to approximately 115,000 square feet of office space.” The GMHB relied upon the statement that there would be only 1,800 housing units under the Urban Village mid-range alternative (City of Shoreline, et al., v. Snohomish County, CPSGMHB Coordinated Case Nos. 09-3-0013c and 10-3-0011c, Order Finding Compliance and Rescinding Invalidity (December 20, 2012) (see footnotes 15 and 16, and accompanying text). In conformance with Addendum No. 1 to the FSEIS and the GMHB decisions, the study assumption must be revised to assume 1,800 housing units in the Urban Village alternative. This same revision needs to be made in the project EIS. Finally regarding Alternative 2, any assumption re senior units should be stricken unless the developer makes binding commitments, as discussed in comment #16 above.

20. Page 9, Section 4.3, ¶ 1 and 4: Use of the ITE Trip Generation Handbook is inappropriate when applied to Point Wells, a remote site, far away from any highway, business district, urban area, other high-density housing area, or high-capacity transit. The remote Point Wells is unlike any of the study areas relied upon to develop the ITE Trip Generation Handbook. Significant adjustments in the ITE numbers must be made, so that the numbers for Point Wells are realistic, reflecting its unique and remote location. And with regard to the statement that "Mode split adjustments are included in the NCHRP 684 Trip Capture Estimation Tool for internalized trip capture," please specify with complete detail exactly what adjustments are being made. We need more than a cross reference to the ITE Handbook and NCHRP 684 Trip Capture Estimation Tools. Exactly what adjustments are employed?

21. Page 10, Section 4.3, ¶ 1st two paragraphs under Table 4: It is inappropriate to adjust the transit mode share based on the Puget Sound Regional Council (PSRC) Growth Targets and Mode Split Goals for Regional Centers (A PSRC Guidance Paper, July 2014), because there is no high-capacity transit hub at the site currently, and there are no binding approvals and commitments by all needed parties to create such a hub. Further, the Point Wells site does not qualify as a Regional Growth Center (RGC) based upon the criteria defined in the PSRC Guidance Paper, so basing any assumptions on RGC qualified status must be stricken. One reason, for example, why the Point Wells site does not meet the RGC criteria, is that it is not located in a “metropolitan” or “core” city.

22. Page 10, Section 4.3, ¶ 3rd and 4th paragraphs under Table 4: The assumed transit mode splits are ridiculously high (up to 22%) and must be disregarded. The appropriate long-term assumption is that 1.5% - 2% of trips will be by bus (see calculations below, based on hard data). Comparing a Point Wells transit hub to the Lynnwood transit center (located along the freeway, and with other distinguishing features) is inappropriate. If Lynnwood has a 7% share, I would expect that Point Wells would have at best a 2% share (see calculations below, based on hard data). In comment #11 above, it shows that there are currently 146 weekday boardings on Metro Routes 304 and 348 at stops in Richmond Beach. Let’s double that number for return trips, so we get 292 bus trips per day. That's 292 bus trips per day vs. 14,989 vehicle ADTs measured on Richmond Beach Road just west of 8th Avenue NW (per the City of Shoreline's 2014 Traffic Flow Map). Dividing 292 bus trips by the total bus trips plus vehicle trips (15,281), shows that just 1.9% of trips are currently by bus. I would expect that the percentage of bus trips to and from Point Wells would be about the same, perhaps even less.

23. Page 11, Section 4.3, Table 5: The transit percentages in the table are inflated. A more accurate long-term assumption is that 1.5% - 2% of trips will be by bus (see calculations in comment #22 above, based on hard data).

24. Page 11, Section 4.3, ¶ 1st three paragraphs under Table 5: See comment #20 above. It is inappropriate to use the ITE handbook and the NCHRP 684 Trip Capture Estimation Tool without significant adjustments to reflect the unique, remote nature of the Point Wells site. It’s apples and oranges. The Handbook and the Estimation Tool are unreliable as applied to Point Wells. Also, the third paragraph says that "The daily trip internalization will not be calculated using the same methods as for the AM and PM peak hours because daily internal capture rates are not available in the NCHRP 684 Trip Capture Estimation Tool and the latest ITE Trip Generation Handbook –An ITE Proposed Recommended Practice (3rd Edition, August 2014).” Please specify exactly how the daily trip internalization will be calculated.

25. Page 11, Section 4.3, ¶ 4th paragraph under Table 5: The text states that "The AM and PM peak hour external trips will be distributed into the study area via the travel demand model developed for the Point Wells Project." Please ensure that the model is updated to reflect that traffic on N. 185th Street is expected to increase significantly when the 185th Street Light Rail Station is completed, and high-density housing develops in the recently up-zoned 185th Street Subarea (see comment #1 above).

Also, please ensure that any model assumptions regarding the percentage of Point Wells trips traveling to and from locations north of the County line vs. to and from locations south of the County line is properly validated. This is especially important because over a rather short period of time, the percentages have varied widely. For instance, originally, the experts assumed that 60% of Point Wells trips would be to and from locations north of the County line, and 40% to and from locations south of the County line. Source: Feb. 2009, Draft Supplemental EIS, Final Docket XIII Comprehensive Plan Amendment-Paramount of Washington LLC. A few months later, the experts assumed that 50% of Point Wells trips would be to and from locations north of the County line, and 50% to and from locations south of the County line. Source: June 2009, Final Supplemental EIS, Final Docket XIII Comprehensive Plan Amendment-Paramount of Washington LLC. About two years later, the experts assumed that 25% of Point Wells trips would be to and from locations north of the County line, and 75% to and from locations south of the County line. Source: March 2011, Point Wells expanded Traffic Impact Analysis, prepared by David Evans and Associates Inc. I've heard people say that a better assumption might be 10% north and 90% south. Again, what steps have been taken to validate the assumptions so that we can have some confidence in them? For example, have you surveyed current Richmond Beach residents to see how often they drive north, asking them to make a written record of their trips for several weeks? If so, have you deducted from their answers, for example, any trips north to and from the Harbor Square Athletic Club in Edmonds or the grocery stores in Edmonds (since the Point Wells development will have its own fitness center and grocery store, Point Wells residents won't be driving north to Harbor Square or the grocery stores in Edmonds). And how will the north-south split change if there is a secondary access road?

26. Page 11, Section 4.4, ¶ 1: Same comment as in comment #25 above, regarding inclusion of new 185th Street traffic and validating the north-south assumptions.

26. Page 12, Section 4.4, ¶ 1st paragraph on page 12: Given that Point Wells is a remote mixed use site covering no more than 60 acres, it is unnecessary and inappropriate to use four Traffic Analysis Zones. Only one zone should be needed to represent the Point Wells mixed-use site due to its size and remoteness. Further, I question any use of the PSRC Traffic Analysis Zones, because I thought that Shoreline's traffic demand model was being used.

27. Page 12, Section 4.4, ¶ 4th paragraph on page 12: Regarding the statement that, "A special matrix was added in order to capture some light-rail station traffic near the I-5 and 185th Street interchange and near the I-5 and 145th Street interchange for the Phase IV full build out scenario," see my comment #1 above. While traffic resulting from both the 185th and 145th street stations is important to include in the study, the impact from 185th is expected to be the greatest. The traffic on N. 185th Street is expected to increase significantly when the 185th Street Light Rail Station is completed, and high-density housing develops in the recently up-zoned 185th Street Subarea.

28. Page 12, Section 4.4, ¶ 4th paragraph on page 12: Regarding the statement that, "The final project site trip distribution patterns for Phase IV of the Urban Center land use alternative were indicated during coordination meetings as being acceptable to the City of Shoreline." What exactly are those site trip distribution patterns? I have received varying information on this matter and would like the details of what site trip distribution patterns will be used. As just one example of the confusion and flip-flopping regarding the patterns, see my comment #25 above regarding the shifting north-south site distribution assumptions. Also, for example, see my comment #3 above regarding the need for an assumption of the percentage of Point Wells traffic that will use that secondary access road.

29. Page 12, Section 4.4, ¶ 5th paragraph on page 12: The traffic on N. 185th Street is expected to increase significantly when the 185th Street Light Rail Station is completed, and high-density housing develops in the recently up-zoned 185th Street Subarea. This increased traffic must be counted in the intersection LOS analysis. See my comment #1 above.

30. Page 13, Section 4.5: The traffic on N. 185th Street is expected to increase significantly when the 185th Street Light Rail Station is completed, and high-density housing develops in the recently up-zoned 185th Street Subarea. This increased traffic must be counted in the intersection LOS analysis. See my comment #1 above.

31. Page 13, Section 4.6: The traffic on N. 185th Street is expected to increase significantly when the 185th Street Light Rail Station is completed, and high-density housing develops in the recently up-zoned 185th Street Subarea. This increased traffic must be counted in the intersection LOS analysis. See my comment #1 above.

32. Page 14, Attachment A: The map (Attachment A), shows that either NW 199th Street or NW 197th Street will be a through street. See my comment #14 about the closing of these streets to through traffic. If these streets are not closed to through traffic, then these intersections should be added as study intersections: (1) NW 197th Street & Richmond Beach Drive; (2) NW 197th Street & 20th Avenue NW; (3) NW 199th Street & Richmond Beach Drive; and (4) NW 199th Street & 20th Avenue NW. Note that NW 199th Street is so narrow that it should never be considered a through street. And NW 197th Street is not much wider. I repeat my position in comment #14 above that these streets should both be closed to through traffic.

Please feel free to call me if you have any questions about my comments.

Thank you.

Tom McCormick
206-915-7755