



March 23, 2009

Mr. Steve Skorney
Snohomish County Planning and Development Services M/S #604
3000 Rockefeller Ave
Everett, WA 98201-4201

Subject: Paramount Docket XIII DSEIS Comment

The City of Shoreline appreciates the opportunity to comment on the DSEIS. This comment letter is a follow up to our comments presented at the February 25 Planning Commission hearing orally and in writing; those comments are incorporated into this letter by reference.

The City's comments in this letter will focus solely on the contents of the DSEIS issued on February 6, 2009. It will not focus on the merits of the proposal. Our additional comments on the merits of the proposal will be offered prior to or at the County Council Public Hearing which has not yet been scheduled. Shoreline's DSEIS comments focus on three areas:

1. Transportation
2. Police and Fire Provision
3. Other Service Provision

Transportation

Transportation Model Assumptions Are Flawed

1. Model assigns too high a proportion of trips coming from and going to Snohomish County

Figures 3.11-5 & 6 – the study assumes that 60% of all trips generated for Point Wells are related to Snohomish County, and only 40% for King County, including Seattle. Of these, perhaps 5% to the north and 5% to the south may be destined for the eastside. Given that the major population and employment center for the region lies to the south of Point Wells, it appears that the trip distribution assumption should be more 50%-50%, or even 40%-60% instead. By designating only 40% of the trips to the south, the model does not adequately address impacts in King County and the City of Shoreline.

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2. Assumption about Background Traffic Growth is High

It appears that one of the assumptions used to develop the future scenario uses a sustained background traffic growth rate of approximately 1.5%, with some areas even higher. This may not be valid for a couple reasons. First, the City of Shoreline is essentially "built-out", with development occurring either on scattered lots throughout the city, through sub-division of individual parcels, or demolition of existing structures. Second, the City of Shoreline has been experiencing a decline in traffic volumes over the last 4 years (2004 to 2008) in the range of -6%. While there may be some years of positive traffic growth, it is unlikely that there will be sustained growth for 18 years, especially given the current economic outlook.

The impact of the lower traffic growth is very important in understanding the significances of the Point Wells development. With little traffic growth, the need for some of the future capacity and safety projects is focused not on background growth but rather the redevelopment of Point Wells itself as the major trigger.

Perhaps stated differently, the DSEIS traffic modeling overstates the background growth, thereby diluting the true impact of the proposed development as the traffic disperses through the network of streets. Therefore, the mitigation for the development is likely to be understated.

3. Assumption about future Bus Service are optimistic

The DSEIS references the Community Transit and Metro routes located in the study area. However, as the DSEIS correctly identifies, the nearest part of the project site is approximately ½ mile from the nearest transit route. Metro is the only transit provider this close to the site. Currently, Metro has two routes that provide service in the vicinity of the proposed project. One is an all day, local route that travels from Richmond Beach to the Northgate Transit center. The other route is a weekday, peak only route that travels from Richmond Beach to downtown Seattle. (The DSEIS incorrectly identifies only one route in this area – the all day, local route.) While the proposed zoning may result in density sufficient to support transit, there are no assumptions made in the DSEIS that transit service to the site will increase.

On a side note, there are reasons to believe that it is unlikely that transit service would be extended to the site. Community Transit provides no service in the area and would not travel through Shoreline to serve this site. Metro's service is overwhelmingly located within King County, with only three routes that cross very slightly into Snohomish County. The development may be able to fund some service extensions but, there is no description of how this will be accomplished and for how long. Over the past few years, King County has trended toward removing their service in Snohomish County. As an agency that is primarily supported by King County tax dollars and facing significant budget constraints, it is highly unlikely that Metro would extend any routes to serve Snohomish County, solely because there is a large population concentration nearby.

4. Model assumes a greater dispersion of traffic onto local streets than is likely to occur

Appendix C lists the existing and assumed future traffic volumes assigned to each turning movement at study intersections. It appears that the model assumptions allocate too many trips onto local streets and collectors instead of using the minor and principal arterials. For example, in following the eastbound PM trips from Point Wells, 87% of the traffic disbursts off of NW Richmond Beach Rd before Fremont Ave N. The traffic modeling in the DSEIS assumes that only 13% of the trips make it to SR99, where 4% turn north, 2% turn south, and 9% continuing east. SR 99 is a state highway and a principal arterial and a significant north/south connector. Our modeling shows and staff concurs that a more reasonable assumption is that a much higher percentage of trips, perhaps 60%, will reach SR 99 and use it to travel both north and south and to make connections to I-5. This may trigger a need for additional roadway improvements that is not recognized in the modeling done for the DSEIS.

5. Planned transportation improvements in King County are not included in the model; staff is unsure of the effect on the model if these improvements were to be included.

Appendix E – The travel demand forecasting report lists the highway improvement projects in the pipeline for 2015 and 2025. However, only Snohomish county projects are listed, most with little to no significance to the Point Wells proposal. Absent are any projects in King County, especially those that are significant to the DSEIS, such as the Aurora Corridor Improvement Project, phases II and III.

6. Zonal analysis of traffic flow south of Richmond Beach Road is lacking, leading to less accuracy in traffic forecast

Appendix E, Figure 2 shows the zones used to develop the model. The main corridor for access to the site is NW Richmond Beach Road in Shoreline. There were a number of new split zones created north of NW Richmond Beach Rd to help improve the accuracy of the forecasting model. However, there was only one split created to the south. If splitting up the zones improves the accuracy of the model, then the lack of this attention in the region of the most impact brings into question the accuracy of the forecast in the area.

Traffic Safety is not adequately addressed

In the area of traffic safety, the report mentions the intersection of 3rd Ave NW and NW Richmond Beach Rd along with the roadway segments of NW Richmond Beach Road between 15th Ave NW and 12th Ave NW, and between 8th Ave NW and 3rd Ave NW as having some of the highest collision rates in the study area. However, there does not appear to be any discussion on the impacts of the development on safety nor offer mitigation to improve safety. A significant increase in volumes associated with the Point Wells development may decrease safety and increase congestion in the corridor, and specifically at 3rd Ave NW and NW Richmond Beach Rd. It is likely that more projects to improve safety and traffic flow will be required in addition to those listed in the study

Conclusion

The DSEIS does a reasonable job considering the Snohomish County impacts, but does not achieve a thorough analysis of the impacts and mitigation needed along the only access route, primarily through the City of Shoreline. Considering that the effect of some of the assumptions in the traffic model that understate the vehicle trips along the roadway system in the City of Shoreline, it is our staff conclusion that full development of the Point Wells site will result in greater impacts than discussed in the study. Corrections to the present and future conditions need to be made to improve confidence in the model output and conclusions.

With current information, it is difficult to estimate the true impacts of increased traffic on Shoreline's streets with the information in the DSEIS.

Staff's initial analysis suggests that the impacts of a development of 3500 units on Shoreline's streets would result in impacts that will be impossible to mitigate.

There will be considerable impact to Richmond Beach Dr NW. Current daily traffic volumes are 790 vpd, with 50am and 50pm peak hour trips. The study indicates that the am peak hour volume will increase to 1,085, and the pm peak hour to 1,310 vehicles. Given the narrow, winding geometry of this roadway, it may not be able to handle this traffic without considerable congestion and delay.

This leads to the following conclusions:

- Development of this area will need to be significantly scaled back for the concepts identified in the DSEIS.
- Traffic model should be modified to address its failings, especially related to trip distribution, and to the background traffic assumptions. The model needs to be re-run to account for these unrealistic assumptions. The analysis should identify unavoidable significant impacts if the property is developed at the levels assumed in the DSEIS, and if impacts can be mitigated to an acceptable level and an acceptable cost, identification of mitigations, their cost, and who should be responsible for bearing the cost.
- If significant impacts cannot be mitigated or if the cost of mitigation is unreasonably high, alternative (less intense) growth scenarios should be identified and analyzed to learn if the reduced growth scenario can be adequately mitigated.
- When considering mitigation measures, traffic and pedestrian safety measures should be taken into account and costs defined.

Shoreline staff would be pleased to assist in reviewing assumptions and outputs of the traffic modeling to make sure that it reflects an accurate representation of reality.

Police and Fire Provision

The Point Wells properties owned by proponent Paramount of Washington, Inc. connects to the regional road network only via Richmond Beach Road in the City of Shoreline. Neither Snohomish County nor the Town of Woodway currently provide vehicular access, police, fire, or emergency medical services to the Paramount property, nor have they indicated their ability to provide such urban services or facilities in the future.

In DSEIS comment letters from Shoreline Fire Department (dated March 9, 2009) and King County Police (dated March 11, 2009), these departments clearly stated that they will not be providing service to Point Wells if it develops as an urban center and is not annexed to Shoreline. If these two entities do not provide service and the Point Wells site is redeveloped as a mixed use center, it is important to identify in the Final SEIS where Police and Fire services come from, and how long the response times will be. It is important to know this information to determine whether the response times should be considered to be significant adverse impacts.

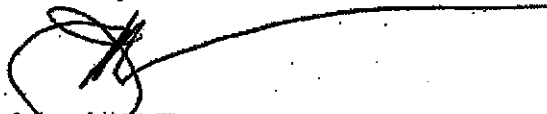
We have enclosed a map of the closest County Police and Fire facilities and their approximate distance to Point Wells.

Other Service Provision

In addition to not providing police or fire protection to this area, neither Snohomish County nor the Town of Woodway current provide parks, code compliance, or sewer service to the Paramount property. These services are integral to a creating and maintaining a residential community. We request that the Final SEIS address these issues in some detail – for example, given the proximity of Snohomish County parkland and library facilities, where are they located and what is the likelihood that Point Wells residents would use Snohomish County facilities when Shoreline facilities are much closer?

Our staff is available to answer questions or assist with analysis. Please contact Steven Cohn at 206-801-2511 or scohn@shorelinewa.gov

Sincerely,



Joseph W. Tovar, FAICP
Director, Planning and Development Services

Attachment: Map of Police and Fire Stations