Ryan,

In February 2009, 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 changed their mind, assuming that 50% (not 60% as previously assumed) 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. The June 2009, Final Supplemental EIS, Final Docket XIII Comprehensive Plan Amendment-Paramount of Washington LLC, says this:

The trip distribution assumption for traffic generated at the proposal site was based on a trip distribution of an existing zone located close to the site that consists of mixed land uses, similar to what could occur under the proposal. This resulted in an assumption that approximately 60% of project-generated traffic would travel to/from the north Shoreline and County area, and approximately 40% of project-generated traffic would travel to/from the King County area. The model developed for the Draft SEIS analysis indicated a tendency for project-generated traffic traveling to/from the north to choose routes through Shoreline and Edmonds parallel to SR 99, to avoid higher traffic volumes on that roadway. In their review of the Draft SEIS, both ... Shoreline and WSDOT indicated concern that these two factors result in an underestimation of potential project impact on Richmond Beach Road/196th/195th/185th and SR 99.

To address these concerns regarding site-generated trip distribution, a supplemental sensitivity analysis was completed for this Final SEIS, in which site-generated trip distribution was assumed to be split approximately 50% to/from the north, and 50% to/from the south. This was combined with an adjustment to the model output that maintained a higher volume of site-generated traffic on Richmond Beach Road/196th/195th/185th, between Richmond Beach Drive and SR 99. The result of combining these assumptions was an analysis scenario that reflected more intense impact on Richmond Beach Road/196th/195th/185th and SR 99, and a lower level of impact on alternate routes through north Shoreline and Edmonds.

This sounds very definitive and well-studied, with all the modeling and the “supplemental sensitivity analysis,” whatever that is.

Well, that definitive analysis wasn’t so definitive after all. About two years later, the experts changed their mind again, assuming that 25% (not 50% or 60% as previously assumed) 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 (ETIA), prepared by David Evans and Associates Inc.

The most recent draft of the ETIA (May 2016) still uses the 25% figure, saying:

2.2 Travel Demand Forecast Model / Project Trip Distribution
The Project-generated trips were distributed to the study area by utilizing the Point Wells Development travel demand VISUM model. The distribution flow pattern in each phase shows that most Project trips (approx. 75%) are attracted south to the Shoreline and Seattle areas - the employment and commercial generators - via Richmond Beach Drive NW, NW 196th Street, NW Richmond Beach Road, and I-5 or SR 99, while less (roughly 25%) Project trips are attracted north, to areas such as the town of Woodway and the cities of Edmonds, Lynnwood, and Everett via the north-south arterials such as SR 99 and I-5.

I believe that a better assumption is closer to 10% north and 90% south.

The developer needs to employ a hard data-based method to determine with certainty the north-south trip distribution. Hard data (e.g., traffic counts with turning movements at numerous intersections) needs to be used to validate the ever-changing trip distribution assumptions. Is it 60%, 50%, 25% or 10% or ???

Here’s an example of how hard data tells us what’s happening: Existing City of Shoreline data (see attached exhibit #1 and #2) shows that about 7.2% of trips by folks living in the red zone depicted on the attached annotated map travel north to Woodway or Edmonds via 24th Ave NW or 20th Ave NW on the routes depicted in blue and black on the attached map. The remaining trips continue east, some later turning north or south. Note: The data in exhibits #1 and #2 provides an accurate picture of the percentage of trips traveling north on 24th and 20th because the folks living in the red zone must all travel through the 196th/24th intersection or the 196th/20th intersection (a few trips from folks living at the north end of Richmond Beach Drive might cut through on 199th, but that is insignificant).

On the attached exhibit #1, not counting westbound trips that turn north (that is, counting only outbound trips from lower Richmond Beach), just 1 out of 79 trips (1.3%) proceeded north on 24th, perhaps traveling to/through Woodway via the route shown in blue on the attached map (the rest continued east). And on the attached exhibit #2, not counting westbound trips that turn north (that is, counting only outbound trips from lower Richmond Beach), just 14 out of 207 trips (6.8%) proceeded north on 20th, perhaps traveling to/through Woodway or Edmonds via the route shown in black on the attached map (the rest continued east). In total, 15 out of 207 trips from lower Richmond Beach (7.2%) traveled north on these routes (207 is the correct denominator; all of the eastbound trips that traveled through the 196th/24th intersection also traveled through the 196th/20th intersection, so counting them would be double counting). Note that folks living in the red zone whose ultimate destination is, for example, Dick’s Drive-In on Hwy 99, or Alderwood Mall, or Costco on 205th, would typically continue east on Richmond Beach Road, then turn north on 8th Ave NW, then 205th, then Hwy 99, etc.(see the attached Google map of a trip to Dick’s Drive-In).

I respectfully request that you require the Point Wells developer to produce hard data (e.g., traffic counts with turning movements at numerous intersections) to validate its trip distribution assumptions, and that a final ETIA not be approved until that is done. Among other reasons, having accurate trip distribution data and assumptions is critical in assessing whether LOS standards are met, in determining what mitigations are needed, etc.

Thank you.

Tom McCormick
TRAFFIC DATA GATHERING

TURNING MOVEMENTS DIAGRAM
7:00 AM - 9:00 AM PEAK HOUR: 7:00 AM TO 8:00 AM

24th Avenue NW @ NW 196th Street
Shoreline, WA

INTERSECTION
PEAK HOUR VOLUME
IN 131
OUT 131

<table>
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<tr>
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<th>Buses</th>
<th>HV</th>
<th>PHF</th>
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PHF = Peak Hour Factor
HV = Heavy Vehicles

COUNTED BY: JH
REDUCED BY: CN
REDUCTION DATE: Tue. 6/4/13
DATE OF COUNT: Tue. 6/4/13
TIME OF COUNT: 7:00 AM - 9:00 AM
WEATHER: Sunny
TRAFFIC DATA GATHERING

TURNING MOVEMENTS DIAGRAM

7:00 AM - 9:00 AM PEAK HOUR: 7:15 AM TO 8:15 AM

20th Avenue NW @ NW 195th Street
Shoreline, WA

CONTRIBUTION: WW
REDUCED BY: CN
REDUCTION DATE: Wed. 6/5/13
DATE OF COUNT: Wed. 6/5/13
TIME OF COUNT: 7:00 AM - 9:00 AM
WEATHER: Sunny

IN 561
OUT 561

INTERSECTION
PEAK HOUR VOLUME

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<th>Buses</th>
<th>HV</th>
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PHF = Peak Hour Factor
HV = Heavy Vehicles