

## Countryman, Ryan

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**From:** Tom McCormick <tommccormick@mac.com>  
**Sent:** Wednesday, August 09, 2017 4:32 PM  
**To:** Countryman, Ryan  
**Cc:** MacCready, Paul; Mock, Barb; McCrary, Mike; Dobesh, Michael; Matt Otten; Uddin, Mohammad; Olson, Erik; Brown, Mark A.; Eastin, Darryl; Debbie Tarry; Kendra Dedinsky; Eric Faison; Bill Trimm  
**Subject:** Re: Point Wells April 2017 Resubmittal and Preliminary Review Comments  
**Importance:** High

Ryan,

Mr. Luetjen's May 11, 2017 email to you (below) says that it "is of course not true" that the traffic study needs to be revised. He mentions, for example, that "the secondary access impacts were already analyzed in the existing traffic study."

Mr. Luetjen is mistaken.

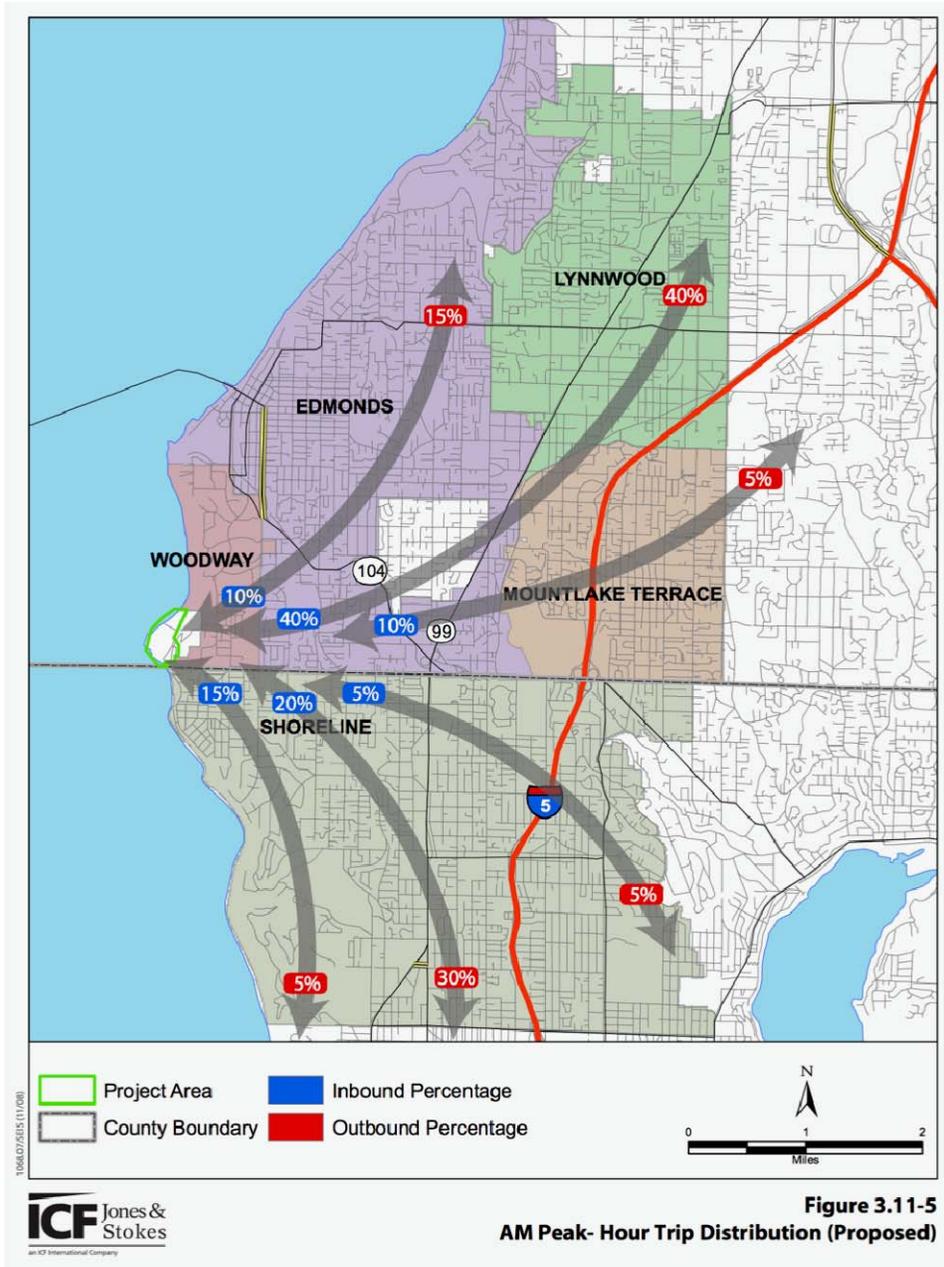
For numerous reasons, the traffic study (Expanded Traffic Impact Analysis, August 2016) must be revised. Here are five reasons why the traffic study must be revised (there are countless other reasons not presented here):

### **1. The secondary access impacts have not been adequately studied.**

For starters, I question how one could conclude that the secondary access impacts have been adequately studied, when the jurisdiction whose road system will be directly impacted by the second access road has not participated in the traffic study. The County should require the developer to work with the Town of Woodway in studying the impact on the Town's road system.

Next, the second access road trip distribution percentages need validation, not a best guess. Per Appendix D to the traffic study, at full buildout (phase IV), about 9.7% of the peak AM trips exiting Point Wells will use the second access road (see Figure 5;  $61/626 = 9.7\%$ ), and about 12% of the peak PM trips going to Point Wells will use the second access road (see Figure 8;  $74/617 = 12\%$ ). Here are snippets from Appendix D:





A few months later, "a supplemental sensitivity analysis was completed for [the] 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." See page 3-34 of the June 2009, Final Supplemental EIS, Final Docket XIII Comprehensive Plan Amendment-Paramount of Washington LLC.

There is good reason to doubt the correctness of the traffic study's north-south trip distribution percentages. The County should require the north-south trip distribution percentages to be carefully validated. At a minimum, there should be multiple origin-destination studies of the travel patterns of current residents residing in the lower Richmond Beach area. What percentage of current trips head north, and what percentage head south?

### 3. Impact of 3-lane Richmond Beach Road on trip distribution.

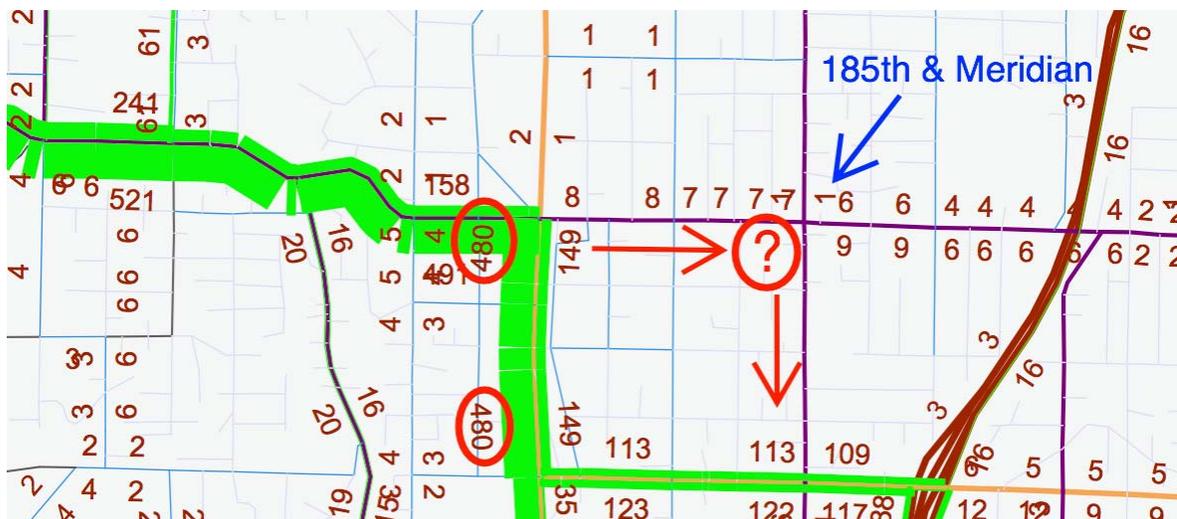
The traffic study fails to include an analysis of how trip distribution will change once Richmond Beach Road is converted to three lanes (scheduled to be completed in 2018). A 3-lane Richmond Beach Road will have a far lower

capacity than currently exists with the 4-lane configuration. The traffic study needs to be revised to show what happens with trip distribution once Richmond Beach Road becomes three lanes. For instance, what will be the impact on alternative routes, including cut-through traffic? What will be the impact on the second access road traffic? And so on.

#### 4. Trip distribution fails to account for Point Wells trips traveling via 185th & Meridian in the City of Shoreline.

Based on the travel patterns of current Richmond Beach residents, a significant percentage of resident trips heading to southbound I-5 currently travel to I-5 via the 185th & Meridian intersection in the City of Shoreline. Yet, the trip distribution model shows NO trips traveling via this intersection to I-5 (see the snippet below from Appendix D to the traffic study, depicting peak AM trip distribution at full buildout (Phase IV)). The County should require the developer to revise the traffic study to give a realistic count of Point Wells trips traveling through the 185th & Meridian intersection. To validate the counts, there should be multiple origin-destination studies of the travel patterns of current residents residing in the lower Richmond Beach area. What percentage of current trips travel through the 185th & Meridian intersection?

The 185th & Meridian intersection is already very congested, and it will become even more congested in 2023 with the scheduled completion of the Sound Transit 185th Street light rail station and new surrounding high-rise residential developments. With added Point Wells traffic, the 185th & Meridian intersection, even if improved, will fail the City's level of service standard D by a wide margin.



#### 5. Overly optimistic buildout date.

The traffic study incorrectly assumes that Phases I through IV will be completed in 2020, 2025, 2030, and 2035, respectively. At the rate things are going, the 2020, 2025, 2030, and 2035 phased completion dates are totally unreasonable. Just ask yourself, what are the chances that Phase I will be completed in 2020? Zero chance. Based on where things stand now, the County should require that the traffic study be revised with phased completion dates no earlier than 2030, 2035, 2040, and 2045. We probably won't see a DEIS until well into 2018, and it may be late 2019 before there's an FEIS. Then, perhaps the hearing is held in 2020, and it may be 2023 by the time all appeals are decided. Add a minimum of five years for both the Ecology EIS and the time to do the cleanup work for the initial phases. That brings us to 2028 for Phase I construction to start, with likely completion well after 2030. Full buildout (phase IV) at best might be completed by 2045.

Using a 2045 buildout date, instead of 2035, will significantly affect the traffic study's assumptions. By 2045, even without Point Wells, there will be considerably more traffic in both Shoreline and Woodway. In addition to 10 more years of normal background traffic growth, in Shoreline there will be extra traffic growth due to the completion of the

185th street and 145th street light rail stations and surrounding high-rise residential developments, and other projects, leaving even less room on Shoreline's roads for additional Point Wells traffic. The County should require the developer to revise the traffic study to reflect phased completion dates no earlier than 2030, 2035, 2040, and 2045.

Thank you.

Tom McCormick

On May 11, 2017, at 4:38 PM, Douglas A. Luetjen <[dluetjen@karrtuttle.com](mailto:dluetjen@karrtuttle.com)> wrote:

Ryan: Thank you for your letter and commentary regarding the Point Wells Urban Center submittal of April 17, 2017. We appreciate that the County staff has worked quickly to review the recently submitted materials.

Although we appreciate the receipt of the County's comments and suggestions, we do however have concerns the County's review is somehow being undertaken without reference to the correct information, is based on incorrect assumptions, and is exceeding the scope and depth of the review appropriate at this time. We thus did not want to wait to send you this initial response.

For example, in your letter you make reference to the 38% internal capture rate from the 2011 Expanded Traffic Impact Analysis even though this information was updated by the 2016 ETIA submitted on September 1, 2016 (which now makes reference to 21% and 23% internal capture rates). The 38% rate is no longer applicable and thus is no longer a subject for the County's review. And where you describe the use of certain traffic analysis assumptions as "unprecedented," we note these assumptions are industry standards (from ITE and NCHRP) and were used with the support of the County's traffic consultant.

Another example, possibly based on an incorrect reference to the 2011 ETIA, made note of a 15% transit use factor. The number of "person trips" forecasted to take transit based on the 15% transit use factor was calculated using the NCHRP worksheet tool and was summarized in the 2016 ETIA. This summary should address your concerns.

A final example is the letter's suggestion that the traffic study needs to be revised, which conclusion is of course not true as (a) the number of residential units and the retail and commercial spaces are in all material respects the same and (b) the secondary access impacts were already analyzed in the existing traffic study.

There are numerous other examples in the County's letter and attachment that suggest that a different approach to the review of the recently submitted documents is in order.

These examples suggest to us that more collaboration is needed between our team and that of the County staff. As such, we suggest that we hold one or more working sessions at the County offices as soon as possible so that County staff time is not spent reviewing old and out-of-date information or using assumptions that are no longer valid. Our team members can readily assist County staff in identifying the correct references. If additional work is deemed required by our team in any of the various subject matter areas, our team is ready to undertake this work immediately.

As a final point, although we understand that the Urban Center application will eventually require a complete and thorough review as part of the planning and permitting process, at the present time it is our understanding that the County's review is to be principally focused on whether the April 17, 2017 submittal adequately addresses the County's concerns (which would allow the County to authorize the recommencement of the draft EIS preparation). We respectfully request that issues beyond this limited scope be made secondary to this immediate issue so that the County is able to quickly and efficiently make a determination of whether the submissions are in compliance with the County's mandated revisions.

Thank you. We look forward to setting up one or more meetings as are required to assist the County in accessing the appropriate materials and information.

Douglas A. Luetjen

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**From:** Countryman, Ryan [ <mailto:ryan.countryman@snoco.org> ]

**Sent:** Wednesday, May 10, 2017 4:23 PM

**To:** Gary Huff

**Cc:** 'zeevs@bsre.co.il'; Douglas A. Luetjen; Brunner, Gretchen ( [gbrunner@eaest.com](mailto:gbrunner@eaest.com) ); Schipanski, Rich ( [rschipanski@eaest.com](mailto:rschipanski@eaest.com) ); Rowe, Tom; Mock, Barb; McCrary, Mike; Dobesh, Michael; MacCready, Paul; Otten, Matthew; Uddin, Mohammad; Olson, Erik; Rachael Markle ( [rmarkle@shorelinewa.gov](mailto:rmarkle@shorelinewa.gov) ); Eric Faison ( [eric@townofwoodway.com](mailto:eric@townofwoodway.com) )

**Subject:** Point Wells April 2017 Resubmittal and Preliminary Review Comments

Hi Gary,

Please see the attached letter regarding the April 17, 2017, resubmittal of the Point Wells project, including some preliminary review comments.

Thank you!

**Ryan Countryman** | *Supervisor, Permitting*

[Snohomish County Planning and Development Services](#)

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