

Countryman, Ryan

From: Tom McCormick <tommccormick@mac.com>
Sent: Friday, August 11, 2017 1:34 PM
To: Countryman, Ryan
Cc: Wright, Stephanie; County Executive; Klein, Ken; Cummings, Jason; MacCready, Paul; Mock, Barb; McCrary, Mike; Dobesh, Michael; Uddin, Mohammad; Olson, Erik; Brown, Mark A.; Eastin, Darryl; Debbie Tarry; Kendra Dedinsky; Eric Faison; Bill Trimm
Subject: Faulty completion date and building height assumptions

Ryan,

According to the Point Wells traffic study that the developer submitted to the County, the developer assumes that construction of the project's Phase I will be completed by 2020 (Phase I includes the south village, with 653 residential units and 36,000 sq ft of commercial/retail). There is zero chance of this happening. See item #5 below, where I discuss why the project, if it ever gets off the ground, will be started (and completed) at least ten years later than what the developer assumes. I trust that PDS will require the developer to reset its completion date assumption, and revise its traffic study and other studies and reports that assume an unachievable 2020 Phase I completion date and 2035 Phase IV (full buildout) completion date. One consequence: After adding ten years to the completion date, the revised traffic study will undoubtedly reveal far worse traffic impacts on the City of Shoreline's roads. The current, flawed traffic study reveals that at full buildout, traffic on one stretch of 3-lane Richmond Beach Road will be 144% of that road's capacity; ten years later, with more base-line traffic, the percentage will be much higher. Under the City's standards, traffic that exceeds 90% of a road's capacity is a not-to-be-tolerated level of service failure.

With the developer's unrealistic assumptions, including project completion date (above), internal capture, trip generation, proximity to high capacity transit, transit usage, etc., it's no wonder that the Point Wells project is encountering problems and delays. The developer has no one to blame but itself.

Here's another example of an incorrect assumption that needs to be fixed, this one involving building heights: As is evident from the developer's application which proposes 20+ buildings taller than 90 feet, the developer assumes (incorrectly) that the project is located near a high capacity transit route or station. Under SCC 30.34A.040(1) (2011 version), building heights greater than 90 feet are not allowed unless "the project is located near a high capacity transit route or station." Contrary to what the developer assumes, the project is not located near a high capacity transit route or station. At some point the developer will need to redo its application to reduce the height of all those too-tall buildings. This will cause further delay. The County has a role to play here. It should set the record straight, and tell the developer now, without further delay, that the maximum building height is 90 feet.

The developer's continuing unrealistic and faulty assumptions need to be addressed without further delay.

Thank you.

Tom McCormick

Begin forwarded message:

From: Tom McCormick <tommccormick@mac.com>
Subject: Re: Point Wells April 2017 Resubmittal and Preliminary Review Comments
Date: August 9, 2017 at 4:32:25 PM PDT

To: Ryan Countryman <ryan.countryman@snoco.org>
Cc: Paul MacCready <paul.maccready@snoco.org>, Barb Mock <barbara.mock@snoco.org>, Michael McCrary <mike.mccrary@snoco.org>, Michael Dobesh <michael.dobesh@snoco.org>, Matt Otten <matt.otten@snoco.org>, Mohammad Uddin <mohammad.uddin@snoco.org>, Erik Olson <erik.olson@snoco.org>, Mark Brown <mark.brown@snoco.org>, Darryl Eastin <darryl.eastin@snoco.org>, Debbie Tarry <dtarry@shorelinewa.gov>, Kendra Dedinsky <kdedinsky@shorelinewa.gov>, Eric Faison <eric@townofwoodway.com>, Bill Trimm <bgtrimm@comcast.net>

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):

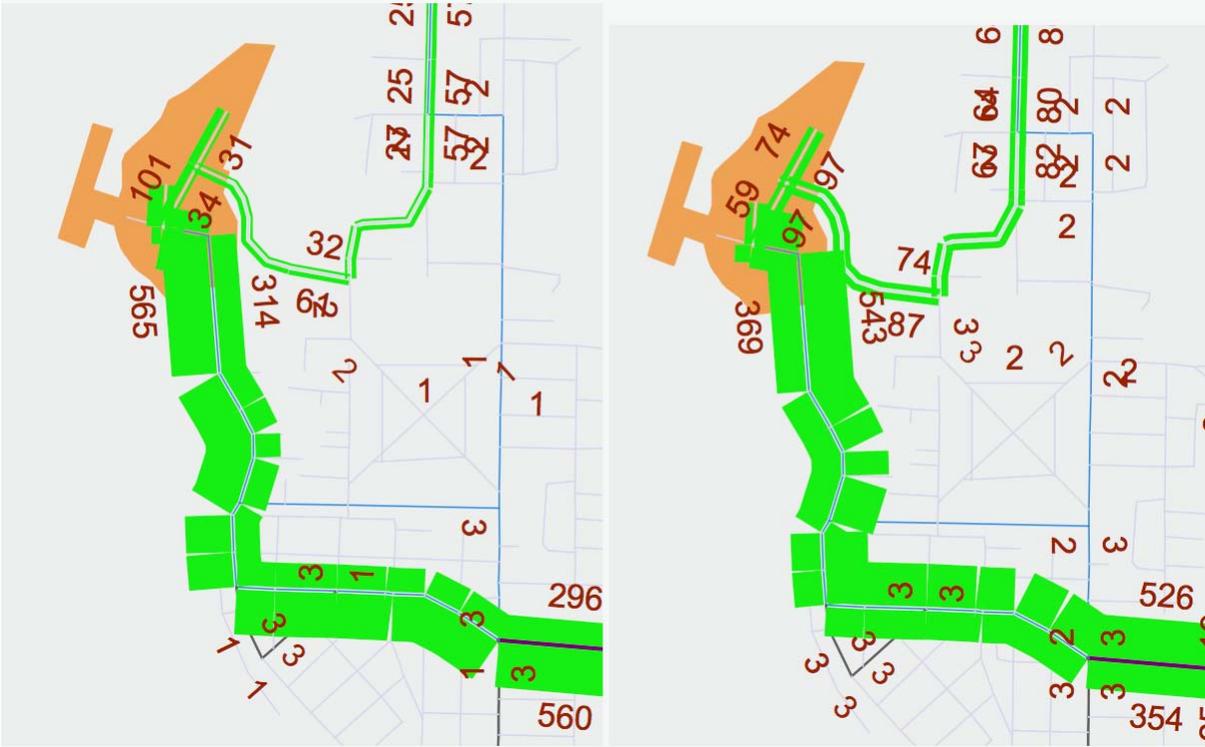
1. The secondary access impacts have not been adequately studied.

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:

Peak AM at full buildout (Phase IV)

Peak PM at full buildout (Phase IV)



The traffic study fails to provide any validation for the above second access road percentages. Maybe the percentages instead should be 5% or maybe 25%? It is noteworthy that about 11 years ago, DEA thought that only about 5% of Point Wells traffic might use the second access road. See the internal DEA memo from Ken Oswell to Jack Molver, dated March 6, 2006, saying:

“An additional access road from the site up the hill to 116th Avenue W . . . would likely not draw many project trips away from critical intersections in the City of Shoreline without substantial improvements to 116th Avenue W, an endeavor that could generate considerable opposition from nearby residents. If constructed, such a road might receive about 5% of the traffic generated from the development.”

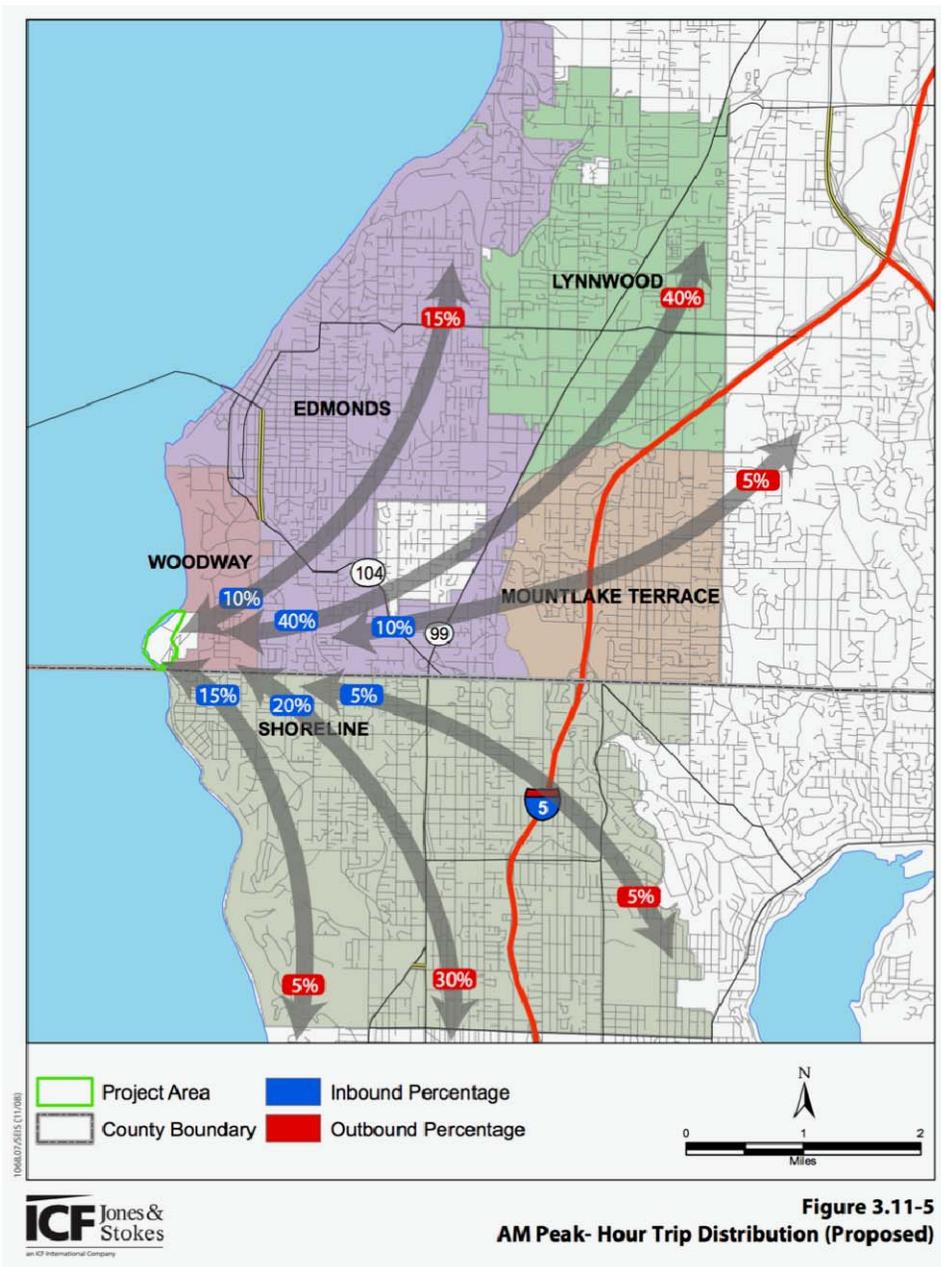
The County should require the developer to fully explain and validate the percentages used. As of now, it appears we have nothing more than a best guess validation.

2. North-south trip distribution.

I also question the assumptions used in the travel demand VISUM model that led to the traffic study’s assumed 75% southbound-25% northbound 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 (approximately 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.” Traffic study, page 10.

The 75%/25% split is a relatively recent assumption. In early 2009, the distribution of site-generated trips projected as part of the travel demand modeling process, showed 60% of trips would be to and from locations north of the County line, and 40% to and from locations south of the County line. See page 3.11-26 and Figures 3.11-5 and 3.11-6 of the Feb. 2009, Draft Supplemental EIS, Final Docket XIII Comprehensive Plan Amendment-Paramount of Washington LLC; a copy of Figure 3.11-5 is reproduced below.



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?

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> 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); Schipanski, Rich (rschipanski@eaest.com); Rowe, Tom; Mock, Barb; McCrary, Mike; Dobesh, Michael; MacCready, Paul; Otten, Matthew; Uddin, Mohammad; Olson, Erik; Rachael Markle (rmarkle@shorelinewa.gov); Eric Faison (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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<Point Wells April 2017 Resubmittal and Preliminary Review Comments May 10 2017.pdf>