

Memorandum

K-38 Point Wells DPW 3rd Review
Memo 5-4-18
PFN: 11 101457 LU

Date: May 4, 2018

To: Paul MacCready, Principal Planner, PDS

From: Mohammad Uddin, Traffic Operations Supervisor
Erik Olson, Transportation Specialist

Subject: Third Review Comments for the Point Wells Urban Center Project PFN 11-101457 LU

The following comments are provided by the Department of Public Works (DPW) concerning the Point Wells Urban Center project (the Project).

The documents reviewed were received by PDS on April 27, 2018 and are titled:

- DRAFT Point Wells Expanded Traffic Impact Analysis by David Evans and Associates dated May 2016 [Exhibit C-28].
- Supplement to Urban Center Development Application, dated April 25, 2018 (the Supplement) [Exhibit A-35].
- Point Wells Development Project Narrative, dated April 17, 2017 [Exhibit A-32].

The applicant provided 7 responses in the Supplement. The following review comments concern the applicant's responses 1, 2, 3, 5, and 6, along with comments at the end on other issues.

Review Comments from Mohammad Uddin concerning applicant's response 4.

4. Senior Housing.

DPW Comments

BSRE defines Senior Housing as "families or individuals where at least one adult shall have attained the age of 55 years" and used **ITE Land Use Code 252** for trip generation in their traffic analysis dated in August 2016. The **ITE Land Use Code 252 for Senior Adult Housing-Attached** defined as "*Senior adult housing consists of attached independent living developments, including retirement communities, age-restricted housing and active adult communities*". The ITE definition of senior housing doesn't specify family nor intended for the housing as defined by BSRE. It is our understanding, and we have been actively using that **ITE Land Use Code 252** solely for senior adult housing and retirement community. We also concerned about the enforcement compliance of the senior units BSRE proposed during the initial occupancy and any changes of the occupancy over the time.

Compliance with the Internal Capture Rate Estimation:

Snohomish County DPW stands on the internal capture rate and the trip capture estimation tool (NCHRP 684) they used is same as our previous memorandum dated in July 12, 2017. But in the BSRE Review Completion Letter RESPONSE #32, the applicant talked about the County staff's agreement on the internal capture rate and methodology. We agreed on the process but not the model, we still think NCHRP 684 is not the appropriate tools to use for the Point Wells developments.

Review Comments from Erik Olson concerning applicant responses 1, 2, 3, 5, and 6.

In reviewing the above referenced documents, I did not see any information that significantly addressed my 2011 and 2017 comments.

1. Vehicle Trip limit and Traffic Mitigation.

DPW Comments

The MOU was between the applicant and the City of Shoreline and it is my understanding that it was only for the purpose of agreeing on preliminaries for the Corridor Study, which the County was not a party to. The Corridor Study was supposed to be the definitive document on the developments traffic impacts and mitigation for the City of Shoreline. As the Corridor Study has never been ratified and approved by the City, the MOU has no relevance to our review unless we receive documentation from the City that they agree with us using the assumptions identified in the MOU.

2. Monitoring of Vehicle Trips and Reporting Compliance.

DPW Comments

The Point Wells development is a unique development in respect to its type, size, location, site constraints, direct impact on surrounding jurisdictions, and other significant factors. The concept of using ongoing vehicle trip monitoring to determine when traffic impact mitigation needs to be constructed and/or when development is stopped, is not what is normally done for developments.

The concept of establishing an overall ADT cap with mitigation milestones and long term real time monitoring is a concept that the applicant has been suggesting for some time. As the DPW have received no comments from either the City or Town, we are not sure if the applicant has presented this concept to them. The DPW is OK with the concept as long as the City and Town also agree with the concept and the assumptions and conclusions (i.e. overall ADT cap, required mitigation, and timing of mitigation) used. All parties would also need to agree the ADT limit for when each mitigation milestone is reached and what mitigation is required to be constructed before the issuance of any further permits, and whichever of the following occurs first, either the developments ADT cap is reached or the last building is constructed. To implement this all parties, i.e. County, City, Town, and Applicant, would need to agree as to what the appropriate monitoring method would be and who would be responsible for implementing and paying for it. As long as the property is in the County the reports (frequency TBD) would be submitted to all the parties.

3. Comparison to Anticipated Trip Counts by Project Phase.

DPW Comments

It is the position of the DPW that if this is an acceptable method to all parties impacted by the developments traffic, i.e. County, City, and Town, all parties, including the applicant, would need to agree on the parameters, components, method, and timing. Until that happens DPW would be unable to support this. This would be included with any agreement reached pursuant to Item 2 above.

The following is from my prior first and second review comment memos and has not been addressed with this submittal.

The method for meeting the Transit Compatibility requirements of SCC 30.34A.085 (2011) will have an impact on determining the trip reduction credits needed to comply with the Transportation Demand Management (TDM) requirements for this development. The allowed credits from TDM affects the developments internal capture rate, which in turn impacts the developments total net new Average Daily Trips (ADT).

The Technical Memorandum to Ryan Countryman, titled “Transportation Analysis Methods and Assumptions”, submitted to PDS on March 29, 2016, under Section 3.3 on page 12 in the second paragraph and Table 3, states:

“The level of transit use assumed for the internal capture rate calculations, correlates to the level of transit amenities and operations that the Project owner is committed to providing to the Project in accordance with SCC 30.34A.080 Circulation and Access, and more specifically Subsection 9 which states: *Applicants must provide transportation demand management measures for developments pursuant to chapter 30.66B SCC with the potential for removing a minimum of 15% of the development’s peak hour trips from the road system.* It is expected that as the Project develops and is completed that the the Project owner will coordinate with public transit agencies to have permanent solution through an interlocal agreement. The forecasted number of person-trips by transit exiting the site during the AM peak hour and entering the site during the PM peak hour is summarized in **Attachment T.**”

“**Table 3** illustrates the transit mode share assumption for the Urban Center Alternative and Urban Village Alternative in the AM and PM peak hour for each construction phase.”

“**Table 3: Transit Mode Share in the AM and PM, Both Directions**”

Alternative	% Transit for Land Uses at the Point Wells Site			
	Phase I in 2020	Phase II in 2025	Phase III in 2030	Phase IV in 2035
Urban Center Alternative 1	5%	5%	10%	15%
Urban Village Alternative 2	5%	5%	10%	15%

In the paragraph language you reference the minimum 15% TDM required for this project. It is unclear in the both the paragraph language and Table 3 if you are using your transit assumptions to comply with the entire 15% TDM required. The 15% TDM requirement is divided into two parts with different percentages, with the first being 5% for all urban developments under SCC 30.66B.630(1) and the second being 10% for an Urban Center development under SCC 30.66B.630(2). Table 3 indicates how much transit use you anticipate, starting with 5% in 2020 and increasing to 15% in 2035. You need to implement the provisions of SCC 30.66B.640(2) to receive trip credits for the 5% TDM under 30.66B.630(1). You will need to provide information on how you will implement and reach these transit assumptions.

NOTE: TDM is reviewed by the PDS traffic development reviewers and you will need to provide them a breakdown of how you proposed to meet your TDM requirements.

The first sentence in Section 3.3 on page 12 in the second paragraph and Table 3 as referenced above states in part: "The level of transit use assumed for the internal capture rate calculations,..." DPW would like to point out that the level of transit use is not germane to calculating a developments internal capture rate.

DPW will be unable to determine the development transit compatibility until you provide adequate information to determine if the development can comply with the transit compatibility requirements of DPW Administrative Rule 4227 (Attached).

5. Supplemental Transit Service.

DPW Comments

The applicant, in its response states that it commits to contracting with a third party or parties to provide supplemental transit service for the development as further described in Exhibit D of its supplement response. In Exhibit D Section 1, the applicant states that the "Supplemental transit service shall, at BSRE's election....." DPW has concerns about BSRE being the sole determiner of who provides the service. To ensure that adequate supplemental transit service is provided and maintained the County (which would include any subsequent annexing jurisdiction) will need to be included as a party to the agreement and have no financial responsibility in paying for the supplemental transit service. In Exhibit D Section 1 the applicant also mentions Metro Transit. We would like to point out (also identified in response 3 comments above) that the Point Wells development is located within Community Transit's (CT) Service Area and they would need to be involved with any agreement with another public agency. In theory this concept works, but DPW would like to have a letter from at least one public transportation entity stating they are agreeable to the concept provided that all parties can agree on the particulars of how it would operate including funding.

6. Commitment to Fund Sound Transit station. Does the statement in G-15 or the feedback from Sound Transit in attached H-24 satisfy what DPW was expecting?

DPW Comments

The information provided by the applicant references a response by Sound Transit (ST) in a 2010 letter from ST to the applicant about locating an ST commuter rail stop adjacent to the Point Wells Development. ST in its 2010 response gave no commitments as to establishing a stop at Point Wells at any time in the future. Since the 2010 ST letter and the 2014 letter from Gary Huff to ST (for which no ST response letter was provided) ST has passed ST3 for the extension of Light Rail into Snohomish County and has issued an FEIS on the extension to Lynnwood. A light rail stop at Point Wells was not included in any of these ST actions. Without a letter from both ST stating they would support and operate a light rail station at the Point Wells site and a letter from the Burlington Northern Santa Fe Railroad stating they would allow a light rail stop at the Point Wells site, the DPW will not apply any trip reduction credits based on it or use it to allow compliance with any other code requirements related to traffic or transit compatibility.

As I stated in my June 15, 2011 comment memo, the project site is located more than ½ mile from any existing or planned stops or stations for high capacity transit routes such as light rail or commuter rail lines or regional express bus routes or transit corridors that contain multiple bus routes, which means the transit provisions in SCC 30.34A.85 (2) and (3) are the only provisions that may apply to this project. For us to consider the provisions of sub (2), i.e. having a transit stop within ½ mile of all residents of the project (i.e. from the main residential/commercial entrance of the farthest building), we would need to have either an agreement or letter assuring future agreement from either Community Transit (whose service area you are in) or Metro stating they will service a transit stop in the development or within ½ mile.

If the applicant is unable to obtain such agreement or letter, they will need to provide information on how they will meet the requirements of SCC 30.34A.85 (3).

Deviation Request

The applicant also applied for an EDDS deviation to allow the use of Private Roads within the development. The EDDS deviation is not required as the County Engineer, pursuant to SCC 30.24.060(2)(f) (2011 version), has already determined that given the unique circumstances of the site and surrounding road systems, County public roads are not required within the development and private roads will be used.

Second Access Road

The applicant has submitted plans showing a second access within a strip of land owned by the applicant that runs up the slope to the east connecting to 116th Ave W in the Town of Woodway. The land outside of the proposed development where the second access road is shown is located within the City of Woodway and is a narrow strip where the existing slope exceeds 15%, which is the maximum allowed by code. The plans show that to meet the 15% max slope, extensive grading needs to take place with the strip and to accomplish this construction and grading easements will need to be obtained from the adjoining property owners. Pursuant to SCC 30.24.020(2)(c) all access roads considered a fire lane must comply with the requirements of Chapter 30.53A SCC. All other access

roads within the development appear to comply with the Chapter 30.53A SCC requirements. The second access road does not and the applicant has not presented any useful information as to how that can be accomplished. Until proof of constructability is presented, DPW cannot accept the second access road as being able to meet the requirements of Chapter 30.53A SCC.