

**From:** Julie Ainsworth-Taylor  
**To:** [Davis, Kris](#)  
**Subject:** Supplemental Comments - BSRE Point Wells Urban Center  
**Date:** Friday, June 01, 2018 10:45:23 AM  
**Attachments:** [Shoreline Cover - Traffic Engineer.pdf](#)  
[Shoreline Traffic Engineer Supplemental Comments.pdf](#)

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Snohomish County Hearing Examiner:

Attached please find supplemental comments from the City of Shoreline's Traffic Engineer.



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**Q-6 City of Shoreline Traffic Comments**  
**PFN: 11 101457 LU**



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June 1, 2018

The Honorable Peter Camp, Hearing Examiner  
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VIA EMAIL: [hearing.examiner@snoco.org](mailto:hearing.examiner@snoco.org)

**RE: BSRE Point Wells LP Urban Center Application  
Hearing Dates May 16, 2018 – May 24, 2018**

The Honorable Peter Camp:

For inclusion in the record of the above referenced matter, attached please find supplemental comments, date June 1, 2018, from Kendra Dedinsky, the City of Shoreline's Traffic Engineer in regards to the BSRE Point Wells Urban Center Application.

Thank you for allowing the City of Shoreline to provide additional comments.

Sincerely,

CITY OF SHORELINE

*//Julie Ainsworth-Taylor*

Julie Ainsworth-Taylor

Assistant City Attorney

Attachment



**SHORELINE  
CITY COUNCIL**

Will Hall  
Mayor  
Jesse Salomon  
Deputy Mayor  
Susan Chang  
Doris McConnell  
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June 1, 2018

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**RE: BSRE Point Wells LP Urban Center Application  
Hearing Dates May 16, 2018 – May 24, 2018**

The Honorable Peter Camp:

The City of Shoreline (“Shoreline”) thanks you for the opportunity to submit additional comments in the above referenced matter. Shoreline attended all days of the hearing in which Snohomish County and the BSRE Point Wells LP (“BSRE”) presented witnesses and I reviewed the testimony of the witnesses relevant to transportation.

The Traffic Impact Analysis (TIA) is a critical component of the project permit. While Snohomish County has concluded that problems with the Expanded TIA have largely been resolved and remaining issues can be addressed during the environmental review process, Shoreline believes this conclusion to largely be a result of mischaracterizations by BSRE and its technical staff both in testimony and within the TIA. In this regard, Shoreline submits the following additional comments:

- **The TIA’s underlying assumptions are a moving target.**

As has been discussed in great detail, the land use assumptions that inform the project trip generation continue to change even within the last two weeks. There has also been an assumption of 15% of trips using transit, however there is no proof that High Capacity Transit can or will be provided or how it will connect to existing or future facilities. Furthermore, the analysis does not account for trips to the site if High Capacity Transit is realized, despite the fact that it will undoubtedly draw trips to the site if it is. The build out years for each phase are clearly inconsistent (as recognized by BSRE’s traffic consultant); background traffic growth will continue to build between now and when the first phase is completed.



All of these factors are in addition to the meagerly documented methodology for trip generation and internal capture rates for a mixed use development.

There is no doubt that the current basis for the project's trip generation is inaccurate. Instead of addressing these inaccuracies by:

- Developing site plans that are consistent with County code;
- Scoping and providing clear documentation that High Capacity Transit can and will be provided; and
- Providing consistent and realistic build out years for each phase.

BSRE has chosen instead to “largely resolve” these issues through reliance on a highly unrealistic trip cap. While Shoreline agrees that monitoring of a cap will be necessary, monitoring of a trip cap alone is not mitigation for project impacts, nor is the arbitrary cap referred to shown to be feasible.

- **Feasibility of mitigation for project impacts has not been demonstrated.**

The Memorandum of Understanding (MOU) between Shoreline and BSRE set a *benchmark* of a maximum amount of trips that Shoreline would be willing to study. This 11,587 daily trips was simply a threshold; it was never intended to function as the maximum number of trips that Shoreline streets could support. This is why the MOU clearly states the conditions for studying this amount of trips and that any analysis and resulting mitigation must comply with Shoreline's Level of Service (LOS) standards. Instead of focusing on Shoreline's standards, BSRE has used the 11,587 trip threshold as a distraction to LOS failures in order to push their permit application through.

Figure 4 of the Expanded TIA shows 15 intersection failures (in consideration of Shoreline's already implemented rechannelization project). For three of these intersection the TIA simply proposes changes to signal timing. This is not an acceptable mitigation as these signals are coordinated and reviewed regularly; there are no additional efficiencies to be realized. Simply suggesting to change the timing or coordination type does not mitigate capacity failures and would likely have adverse effects on the broader network.

At least three additional intersections, and likely more, will require private property acquisition to mitigate for LOS failures, one of which would require coordination with three jurisdictions. No evidence was presented to demonstrate that efforts have begun to coordinate these property impacts or that BSRE has made any attempt to acquire this property which will be necessary to mitigate its impacts. In addition, there are at least six intersection LOS failures for which feasibility of mitigation has not been demonstrated.



Regarding Shoreline's Volume to Capacity (V/C) Level of Service Standard, the Expanded TIA discusses three options; 1) eliminate bike lanes and safety benefits of the now implemented three-lane roadway by converting back to a four-lane roadway, 2) simply ignore the LOS for the sake of permitting more trips from this development, and allow it to exceed the maximum V/C ever allowed within Shoreline, or 3) a combination of exempting the V/C for some segments, and relying on Shoreline to widen the most constrained segment between 3rd and 8th Ave NW. None of these options are mitigation for the projects impacts and simply function to degrade Shoreline's transportation infrastructure beyond a level that Shoreline has deemed acceptable and puts the burden on Shoreline to fix. Lastly, statements made during BSRE testimony that Shoreline has had "long standing plans" to widen the segment between 3rd Ave NW and 8th Ave NW to five lanes are simply untrue. This is verifiable by viewing Shoreline's planning documents including the Transportation Improvement Plan, the Capital Improvement Plan, and the Transportation Master Plan; none of which even mention this idea.

The Summary of Impacts and Mitigation of the Expanded TIA, at Page 87, Section 5. States: "The impacts to this corridor and adjacent neighborhood streets as a result of the increased traffic due to the Project can be mitigated to an allowable LOS." In BSRE's recent testimony, they claim to have provided a "list of necessary mitigation to complete the project". If Snohomish County during their review were to focus on these kinds of summary statements, and without the perspective of reviewing as the impacted agency, they may believe there to be only minor issues for the EIS to address however this is simply not the case as appropriate mitigations have not been demonstrated.

- **Failure to complete the TCS and comply with the terms of the MOU.**

Despite BSRE's characterizations that completion of the Transportation Corridor Study (TCS) was imminent and not finalized due to politics, there are in fact many technical and MOU related gaps that remain. To date, the TCS has failed to demonstrate mitigations that can satisfy Shoreline's Level of Service criteria:

LOS D for intersections with no through movement less than E and a street segment V/C ratio no greater than 0.9.

The MOU also sets a condition for:

ADA compliant non-motorized facilities to be provided to fill any gaps in non-motorized connectivity.



Shoreline understands a completed TCS to be a key component of Snohomish County's required TIA and while BSRE has characterized this process as largely completed, Shoreline believes the process to have met an impasse in the technical requirements set by the MOU which BSRE was unwilling to comply with. The testimony presented by BSRE's Traffic Consultation painted a picture of BSRE's investment in the TCS process and while true, Shoreline has invested an equally significant and non-reimbursable amount of staff time and resource, as well as hiring consultant assistance at key points throughout the process.

In conclusion, Shoreline continues to believe that the Point Wells Urban Center Project is not, nor can it, achieve compliance with Snohomish County's codes, plans, and regulations which include interjurisdictional coordination in regards to traffic for which Shoreline will be the primarily recipient.

Sincerely,

CITY OF SHORELINE

*//Kendra Dendinsky*

Kendra Dedinsky  
City Traffic Engineer