



**SHORELINE
CITY COUNCIL**

Will Hall
Mayor

Keith Scully
Deputy Mayor

Susan Chang

Doris McConnell

Keith A. McGlashan

Chris Roberts

Betsy Robertson

November 5, 2020

The Honorable Peter Camp, Hearing Examiner
Snohomish County
Office of Hearings Administration
3000 Rockefeller Ave M/S 405
Everett, WA 98201

VIA EMAIL: hearing.examiner@snoco.org

RE: BSRE Point Wells LP Urban Center Re-Submittal Application
Hearing Dates November 4 – 5, 2020
Transportation Impacts

The Honorable Peter Camp:

The City of Shoreline (“Shoreline”) submits these comments regarding transportation impacts arising for BSRE Point Wells LP’s (“BSRE”) December 12, 2019, resubmitted applications for an Urban Center at Point Wells. After reviewing BSRE’s December 12, 2019 application resubmittal documents, it appears many of the transportation-related problems expressed by Shoreline in the 2018 public hearing on BSRE’s original Urban Center development proposal have not been addressed. See, Exhibit Q-6.1

BSRE continues to misrepresent the terms of the Memorandum of Understanding (“MOU”) dated April 1, 2013 between BSRE and Shoreline. See, Exhibit A-35, Exhibit A. BSRE’s Exhibit V-3 Supplement to Urban Center Application continues to portray a scenario where BSRE obtained the City’s permission to add up to 11,587 daily trips to Shoreline’s street network. As Shoreline stated in 2018, the 11,587-trip reference in the MOU was not in any way intended as an acceptable level of trip generation; it was simply the agreed upon value of trip generation to be studied. Importantly, nowhere in BSRE’s December 2019 submittals does BSRE address the most critical requirement - the mitigation of project impacts in compliance with Shoreline’s Level of Service (LOS) standard of D for intersections with no through movement less than E and a street segment Volume to Capacity (V/C) Ratio no greater than 0.9. Exhibit V-3 spends two pages discussing a trip monitoring program based on a trip limit for which BSRE has not proven there is actual roadway capacity for.

The 2016 Expanded Traffic Impact Analysis (TIA), which has not been updated, demonstrates numerous intersection LOS failures for which adequate mitigation is not identified. See, Exhibit C-

¹ For the purpose of this comment letter, Shoreline utilizes the exhibit numbers assigned by the Hearing Examiner in the 2018 proceedings.

28. Additionally, the TIA analysis shows roadway segment LOS failures (with regard to the V/C ratio standard) for which the TIA discusses three unacceptable 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 direct project 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. BSRE's December 2019 submittals, including Exhibit V-3, do nothing to rectify these deficiencies.

BSRE has also failed to recognize and address a current trip limit to Richmond Beach Drive, the primary roadway serving the development. Shoreline's Comprehensive Plan states: In view of the fact that Richmond Beach Drive between NW 199th St. and NW 205th St. is a local road with no opportunities for alternative access to dozens of homes in Shoreline and Woodway, the City designates this as a local street with a maximum capacity of 4,000 vehicle trips per day. Updated trip generation numbers show 9,890 daily trips; more than double the established limit for this local street.

Lastly, BSRE's trip generation methodology continues to raise concerns. December 2019 submittals show a reduction in overall land use. As such, trip generation estimates have been updated, using NCHRP Report 684 - Enhancing Internal Trip Capture Estimation for Mixed-Use Developments methodology; a methodology highly dependent on subjective technical expertise. Since the NCHRP report was published, additional studies have been conducted to vet its assumptions and methods. One such example comes from the Center for Urban Transportation Research, which studied 4 mixed use sites in Florida. This study showed a maximum PM peak hour internal capture reduction of 16% and all mixed-use sites studied had significantly higher supporting land uses in comparison to BSRE's proposal. For example, the lowest ratio showed 670 square feet of supporting land uses per every residential unit. In comparison, BSRE is proposing just 49 square feet of supporting land uses per residential unit but is still claiming a very high 17% internal capture trip reduction for the site. In addition, they are assuming a 15% reduction based on mode shift to transit. According to Puget Sound Regional Council's 2017/2019 Household Survey, travel via transit accounted for just 5.7% of trips; it is unclear how such a high rate of mode shift to transit would occur for the Point Wells site, especially given the lack of directly connecting transit options that can be provided by one shuttle or transit route. In addition, transit stations are trip generators in and of themselves, as are the associated bus trips, which BSRE has failed to capture in trip generation estimates.

Thank you for considering these transportation-related comments from the City of Shoreline.

Sincerely,

/s/ Kendra Dedinsky

Kendra Dedinsky
City Traffic Engineer