



City of Bothell™

Canyon Park Subarea Plan Update

Draft Environmental Impact
Statement comments received on or
before January 13, 2020.

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Fri 1/10/2020 5:21 PM

Carol Zada <czada@yahoo.com>

[EXTERNAL] 9th ave public meeting of the 9th of january

To Canyon Park

[Retention Policy](#) [Auto Delete Inbox Message At 90 Days Old \(90 days\)](#)

Expires 4/9/2020

I attended this meeting and found it to be very useful regarding information. I was, however, surprised that at least one person in the decisions making process admitted that he had never seen, walked down or driven down 9th Ave. I think that's short of crazy. How can one offer an opinion never having seen what they are talking about? This person mentioned the possibility of a light at 226th and 9th. Bad idea. Lights just stop traffic.... look at the Bothell-Everett hwy.

I would like to invite the Bothell project team to my house and then take an hour to walk down 9th Ave with me. I am retired and free most days until the 21st. Or we can do it when the weather gets a little better. Another idea is to drive the length of 9th Ave from the north to the south at 0730 on a weekday.

Hoping to hear back. I have umbrellas.

Carol Zada

22624 9th ave SE
Bothell, WA 98021

Bothell Canyon Park Subarea Plan and EIS

Thursday, January 9, 2020, 6:00 – 9:00 PM

Canyon Hills Community Church

Please share your comments on the Draft EIS. Thank you for your time and participation.

214th ST SE Extension:

Table 3 states "reduces unnecessary new vehicle trips on SR 527 and SR 524" We are concerned about the new vehicle trips that will now flow onto 9TH AV SE. A street that is already congested with people currently bypassing SR 527, people going to Crystal Springs Elementary and the residents of the new housing developments on 9TH.

We would like to see current traffic counts from 9th Av SE, compared to 2040 traffic counts that do not include 214th ST SE extension and 2040 traffic counts that includes 214th ST SE extension. Both 2040 counts should include estimated development on 9th Av SE

There have been a number of single homes on acreage developed into 27 homes on the same parcel of land. This trend will continue as property taxes keep increasing and current residents sell to developers. Developers are the only market interested in acreage and 50+ year old homes.

In addition to traffic counts, what are the plans for improving sidewalks on 9th AV SE. The current sidewalks are scary at best. Will there be guaranteed funding to build adequate sidewalks on the east side of 9th for the length of 9th? Will there be guaranteed funding for adequate traffic calming devices. What will they be?

Today, the 35mph speed limit is only a suggestion for most people. Speeding is getting worse every year. This needs to be addressed soon. The center turn lane in front of Crystal Springs Elementary has become a passing lane.

The center turn lane has also impacted our common mailbox on the corner of 215th and 9th. We have to stand IN the northbound lane to get our parcels out of the box. This is no easy task during the day.

We are deeply concerned about the wetlands that would be impacted by the extension of 214th ST SE. It seems that alone would take the 214th ST SE extension idea off the table.

Your Contact Information (Optional)

Name: Owen and Ann Pejsa	Address: 21510 9TH AV SE
Email Address: owenann@msn.com	Phone Number 425-402-0647

For More Information:

Contact: Bruce Blackburn, Senior Planner

City of Bothell, Community Development Department

18415 101th Avenue NE

Bothell, WA 98011

CanyonPark@Bothellwa.gov

Visit the project web site at: <http://www.ci.bothell.wa.us/1176/Canyon-Park-Visioning>

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Mon 1/13/2020 5:55 PM

Coby Zeifman <cobyzeif@gmail.com>

[EXTERNAL] Canyon Park Suburban Plan - Community Feedback

To Bruce Blackburn

Retention Policy Auto Delete Inbox Message At 90 Days Old (90 days)

Expires 4/12/2020

Hi Bruce

I am a millennial, home-owning father of a 3 month old in Bothell.

Part of the appeal of us moving to Downtown Bothell was how easy it was to walk and bike to get places. This was even before we had our daughter. We walk to the park, we walk to get coffee, we walk to the library, and the post office.

Needless to say we are big fans of mixed use and walkable & bikeable neighborhoods.

The more "right-sized" the streetscape and the more transit options the better!

Im in favor of 'SAMPLE ALTERNATIVE 2'

As the Eastside continues to expand, communities like Bothell are going to be in an excellent position to absorb new residents that need housing. The more housing, mix used zoning, medium density (duplex, triplex) and transit options the better for our community!

My daughter's generation will inherit this future vision for Bothell, and if done right, it keeps us here for many happy years to come.

Thank you for your consideration.

Sincerely,

Coby

--

Coby Zeifman

cobyzeif@gmail.com

[@cobycycles](#)

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Sun 1/12/2020 12:34 PM

D K <dkkuiper@hotmail.com>

[EXTERNAL] feedback from community meeting re 9th ave SE

To Canyon Park

[Retention Policy](#) [Auto Delete Inbox Message At 90 Days Old \(90 days\)](#)

Expires 4/11/2020

Hello and thank you for organizing the community meeting last week. Here are some of the pieces of feedback I would like to provide:

First off, I should say that we live on the north end of 9th Ave. Our address is 21129 9th Ave SE in case that helps. Main feedback:

- Main concerns with any of the road options (connections such as 214th or others which will allow more cars on 9th) are
 - safe streets for pedestrians (kids especially) via sidewalks
 - limiting speed of cars
 - Allowing for us as a resident to easily get in and out of our driveway in a safe manner

Some suggestions to these issues, most of which came up in discussion:

- Safe streets:
 - The sidewalks with the foliage between the road and the sidewalk give me the absolute most comfort when my kids are walking/biking or even when I'm with them. There are plenty of areas on 9th where there is either no sidewalk or the sidewalk is DIRECTLY adjacent to a 35mph car or big huge truck/bus and there is literally no barrier space. Then, when you add the fact that people drive faster than the speed limit it worries me even more.
- Limiting speed of cars:
 - This is sort of tied to the above and below issues. If there are no "protected" sidewalks then 35 is still really fast when you are literally right next to cars. And, getting in and out of your driveway in a safe manner is a concern. During non-peak times it does seem like 35mph is ok but I probably feel like 30mph is safer. I will let the traffic folks help assess the best remedies, but I'm not hugely in favor of speed camera's because quite frankly maintaining the perfect speed is hard and I don't want tickets on my own street if I stray a few miles over. I'm mostly concerned with the very fast cars that speed down the street, but there are plenty of cars going with the flow at 40 and 45mph (my estimate). I wouldn't mind if the area by Crystal springs was permanently a 20mph zone because then I think it might also deter people from using this road and flying down it during rush hour times. I'd be more in favor of a speed cam in the school zone, but still don't like it. I'd rather see more regular police speed "traps" or maybe a longer stretch of road where it is the "20mph while flashing." I've driven on plenty of roads where the speed boards are put up and I like those, but perhaps we would need 2 on 9th going each direction. As much as I wrote a lot on this issue, it is probably the lowest on our list of these three things but is something we aren't sure how to address and what the right solution is. When I'm driving on 9th late at night I don't want to have to go 20mph, but I do understand that variable areas is a tough thing as well.

- One of our main concerns over increasing traffic throughput on 9th is access in and out of our driveway, and doing so in a safe manner. At many times of the day already it can be difficult to get out of the driveway because of the constant flow of traffic in either direction. Our location could have something to do with it because we are in a place where people speed up going north after they leave the school zone, or, there is intense queueing for the light at 208th and 9th which backs up past our house. I personally do not feel like waiting on the goodwill of others to allow us in is a good solution, especially when it isn't at a standstill. On 9th ave the traffic has gotten so bad that I often see people trying to be nice and let you in/out of driveway but it actually isn't safe because then they are slowing to a stop and the cars behind them aren't prepared for it. Being nice isn't always the safest decision when driving a car. Plus it also creates ambiguity etc. We are concerned that more cars means less chance to get in/out of our driveway. I don't know how to remedy this. If there is a light at 214th for example I don't know if this helps things because of the staging of cars or if it makes it worse because of the increased throughput on 9th, and I know there may not be a perfect solution. But I will say that partly because people go fast on 9th all the time I feel like I have to make split decisions and accelerate quickly and this isn't safe for me, my wife, my kids when they learn to drive, and all other cars/people on the road. Perhaps this could be partially mitigated by a 30mph limit? It's a lot harder to get out of my drive when people are going 40 than 30. I also genuinely fear for accidents when I slow down to turn into my driveway – I'm sure I will be rear ended at some point. I've seen an accident involving my neighbor for exactly this reason – tailgater didn't stop when he was turning into his driveway. I heard people talking about how to sync the stoplights at 228th or 208th to help allow for gaps, but I'm not sure if that's the answer – I suppose that could simply lead to more queueing.

We realize that it is a difficult situation and appreciate all of your considerations. I also realize my email got a bit long. In summary, safety of pedestrians is our primary concern, followed by access in/out of our driveway first off and then also being able to do it in safe manner. Lastly we are concerned about the speed of vehicles and it relates to both of these other issues.

Thanks for what you are doing and please feel free to reach out if you wish to include our further opinions/involvement in the matter. We look forward to continued updates and meetings.

The Kuipers
21129 9th Ave SE

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Sun 1/12/2020 12:48 PM

D K <dkkuiper@hotmail.com>

[EXTERNAL] FW: feedback from community meeting re 9th ave SE

To Canyon Park

[Retention Policy](#) [Auto Delete Inbox Message At 90 Days Old \(90 days\)](#)

Expires 4/11/2020

Hello again, I omitted probably the most important aspect of our feedback – we're not in favor of creating the connecting roads. Part of why we chose this house is because we were sort of "tucked away" from Bothell Everett highway even though we are close as the crow flies. Adding more through-roads like the 214th then makes us closer to the city, and I know it may not seem like much, but it does

change things because of the higher volume of cars. We are strongly against the changes. Our comments below exist in our current conditions and we believe that any additions would only exacerbate the issues.

We've "only" lived here for 5-6 years but we planned to retire here. In this last period of 5-6 years I've seen more and more cars use 9th as a bypass to B.E. HWY, and I've seen a dramatic increase in queueing at the various intersections (turning left onto 9th from 228th eastbound, 9th ave heading north into the intersection at 208th, and on 9th Ave heading south into the 228th intersection especially turning left onto 228th). We realize that things change but quite frankly we would hope for these issues to be addressed even if no through-roads are made.

Thanks!

David Kuiper

CANYON PARK SUBAREA PLAN 1/10/2020 OPEN HOUSE

Comments

(revised 1/16/20 to correct street collout of 114th to 214th)

By

H. Gaylan Smith

21321 9th Ave SE

@

gaylan_and_doris@frontier.com

Stated Purpose

- ◆ Move more people going North and South along SR 527 and East and West along Maltby road to accommodate more people for regional growth in area between I-405 and 208th street and bounded on west side by 9th Ave and East side by 35 AVE SE

- ◆ Growth estimate is in excess of 20,000 people
 - ◆ 4500 of which would be by new residents
 - ◆ Achieved by increasing housing density from 19/acre to 45/acre

Objectives to Include

- ◆ Changing development standards such as height, density, parking, etc.
- ◆ Invest in transit and roads
- ◆ Invest in parks
- ◆ Storm water/quality improvement
- ◆ Enhance North Creek & wetlands
- ◆ Maintain quality of life for residents

Unacceptable proposal

- ◆ An unacceptable proposal presented was to
 - ◆ Extend 214th street to provide a connection between SR 527 and 9th Ave SE
 - ◆ Traffic estimated to be at 1000 PM
 - ◆ Modify 9th Ave to handle additional traffic flow
 - ◆ Handle the additional traffic resulting from 214th st extension connecting SR 527
 - ◆ Handle additional traffic connecting 228th to Maltby road resulting from growth in surrounding area

WHY UNACCEPTABLE

- ◆ All things considered, the extension of 214th connecting SR 527 to 9th Ave. SE will not significantly meet the stated objective
 - ◆ Move more people going North and South along SR 527 and East and West along Maltby road to accommodate more people for regional growth in area between I-405 and 208th street and bounded on west side by 9th Ave and East side by 35 AVE SE
- ◆ Traffic flow on 9th Ave currently is impaired (restricted, slowed down, stopped, backed up, etc) during peak hours in the morning and afternoon.
 - ◆ Morning and afternoon heavy congestion occurs at Crystal Springs Elementary School (21615 9th Ave SE) as children arrive and leave (walking, buses, parents in private vehicles, etc)
 - ◆ 20 MPH speed limit in school zone
 - ◆ Red lights at 228th and at 208th intersections
 - ◆ Minimal turn lanes at both intersection resulting in backup for next green light
- ◆ Current driver behavior observed are
 - ◆ Speeding in school zone and (35 MPH zones)
 - ◆ Passing on double yellow lines
 - ◆ Passing using turn lane in school zone
 - ◆ Sever tail gating, verbal, sign language and horn abuse.
 - ◆ Rear end accidents
- ◆ Increase traffic from growth is increasing risk of harm to school children

WHY UNACCEPTABLE – continued

- ◆ Extension of 214th street connecting to 9th Ave SE will not result in
 - ◆ Storm water/quality improvement
 - ◆ Enhance North Creek & wetlands
 - ◆ Maintain quality of life for residents
- ◆ Extension of 214th will increase road water flow into North Creek and tributaries without the benefit of filtration from wet lands
- ◆ North Creek & wetlands are degraded/eliminated by rerouting of tributaries, additional bridges, road water flow, and wetlands are destroyed.
 - ◆ Current area of wet lands and existing green belts is a wild life habitat for coyotes, deer, bear, and birds including owls, etc.
- ◆ Quality of life for residents along 9th Ave SE and 214th Street is diminished
 - ◆ Access/egress to homes is further hampered by increased traffic.
 - ◆ Ability to turn onto 9th Ave at peak hours is currently at risk
 - ◆ Road noise is increased
 - ◆ Privacy is diminished
 - ◆ Especially so for those adjacent to the wet lands
 - ◆ Private homes will be torn down if 214th street is extended.
 - ◆ Homes will be put at greater wind damage risk
 - ◆ Trees currently providing buffer will be removed by 214th street extension

Alternatives to Explore

- New access to I-405 to carry away South bound traffic on 29 Dr SE and 31 Ave SE
- Extension of 30 Dr SE to connect to SR 524
 - Provides North exit to business park
- New access to I-405 to SR 524 in neighborhood of Locust Way, Filbert Rd, and Larch Way where they converge
 - Provides relief to 208th
- Addition of new park and ride parks to feed new and existing business locations by the proposed improved (forthcoming) transit systems.
 - Removes traffic congestion
 - People will migrate to the path of least resistance

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Thu 1/9/2020 8:51 PM

Javen O'Neal <javenoneal@gmail.com>

[EXTERNAL] Feedback from Jan 9 Public Outreach Meeting

To Canyon Park

[Retention Policy](#) [Auto Delete Inbox Message At 90 Days Old \(90 days\)](#)

Expires 4/8/2020

Thank you for taking the time to hold the public outreach meeting this evening.

I'm excited that there's an opportunity to improve alternative transit in the region by connecting sidewalks and adding bike lanes or multi-use paths on 9th Ave.

Thanks

Javen O'Neal

Resident at 21525 11th Ct SE, Bothell, WA 98021

From: Kellye Moses <kellye32@hotmail.com>

Sent: Friday, December 6, 2019 2:33 PM

To: Bruce Blackburn <Bruce.Blackburn@bothellwa.gov>

Subject: [EXTERNAL] Re: Notice of Availability Canyon Park Planned Action Draft Environmental Impact Statement

Hi Bruce,

I have big concerns about continuing to add more business offices and residential space to this area. We that live in these neighborhoods know that if we are home that we can't leave our house after 5pm because we will either be stuck in traffic on 228th or on Maltby. You can't even go to the grocery store and it already takes forever to get to the freeway. I don't see the streets being widened so I don't see how we can fit more cars.

Our schools are also being impacted. Some of the elementary schools have had to split what middle school they feed into so some kids are having to go to a middle school without the majority of their friends and there is more rezoning coming. Some kids are attending a school this year but know that next year they have to move. I think our community has had enough of this.

I'm all for new restaurants along bothell Everett highway but please no more burger or pizza places. We need healthier options that are affordable.

Why is it that the city is wanting to jam more cars and people into our community? We don't have the infrastructure for it!

Thanks,

Kellye Moses
425-287-7907

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Fri 12/6/2019 8:52 PM

Stephanie Hoopingarner <Stephanie@hoopingarner.net>

[EXTERNAL] Canyon Park Subarea Plan Draft EIS

To Canyon Park

Retention Policy Auto Delete Inbox Message At 90 Days Old (90 days)

Expires 3/5/2020

Hello,

I live between Canyon Park and North Creek, and really like a lot of the changes proposed here. However, the biggest area of traffic congestion in this area is 228th from 39th through 9Ave. The intersection of 228th and 527 is incredibly dangerous and people run red lights often, or go through the light when they shouldn't which blocks the intersection for the next light change. I see that the city has installed what appear to be traffic cameras on all of the lights on 228th. I would love to see us make use of them and ticket people running red lights the way that Lynnwood does. This would be an excellent source of revenue for the city and would prevent so many traffic issues that block intersections, and cause risk to both drivers and pedestrians.

Secondly, in looking at this proposal, I am not seeing how we are alleviating traffic from the 228th St corridor. I know widening the road would be difficult due to the building that has already occurred in this area, but is there a way to funnel traffic in the same direction so that there is an alternate route for the office park to take? Perhaps I'm just not understanding the plan completely.

Thanks for your time,
Stephanie Hoopingarner

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Mon 1/13/2020 4:49 PM



Sarah Gustafson <sarah.c.gustafson@gmail.com>

[EXTERNAL] Canyon Park EIS Comments

To Bruce Blackburn

[Retention Policy](#) [Auto Delete Inbox Message At 90 Days Old \(90 days\)](#)

[Expires 4/12/2020](#)

Dear Mr. Blackburn & Consultants:

Thank you all for your hard work to elicit public comment on the Canyon Park EIS. I attended the 1/9 meeting that you organized. Your workshops were particularly enlightening and constructive.

Here are my comments:

1. **Support for Live/Work alternative.** We need to add smart growth to Canyon Park to avoid sprawl elsewhere in Bothell. During the workshops, I heard my fellow residents express interest in this alternative. One person I just met that evening was very excited about creating homes in the empty spaces of Canyon Park. The vision of having people both live and work in Canyon Park is compelling!
2. **9th Ave South walking connections to BRT** - In any alternative, we need to make the Bus Rapid Transit stop more accessible. Convenient walking routes can be the best-kept secrets of any neighborhood. Canyon Park is no exception. Within the Canyon Park neighborhood, there exist hidden shortcuts to the BRT. In one workshop, residents of 226th Street pointed out a dirt path that their neighbors use to get to the bus station (after crossing 9th Ave). This path may need a bridge repair, better lighting and some more publicity. Can we make these improvements? How can we make these shortcuts known to all? How can we get more people to feel comfortable walking to BRT? Let's please survey the community about footpaths and how to improve them.
3. **228th/527 Intersection** - Let's improve safety here for all travelers. At the 1/9 meeting, several residents noted safety issues. Drivers routinely run red lights, creating hazards and bottlenecks. I also heard that drivers don't stop properly before making right turns on red lights. This safety deficit makes life difficult for pedestrians, especially pedestrians on the south side trying to cross north. Can we add red light cameras or an enhanced police presence here?
4. **Wetland Mitigation** - The EIS outlines some traffic fixes that would impact wetlands. One such project is the 214th St SE extension (page 1-20). Here, the City might pursue compensatory mitigation. As I understand, the general standard for compensatory mitigation is "no net loss of ecological function." I urge the City to go beyond the "no net loss" standard and instead seek mitigation that provides a net ecological benefit.
5. **"Green-in-lieu" Development Standards** - As we set new development standards, can we nudge businesses to build ecologically friendly features? I appreciate the EIS's focus on stormwater and habitat. I also noted the new development standards on EIS page 2-15. Relaxing the parking requirements is a great step towards a more sustainable city! But, can we go further? Can businesses further reduce their parking requirements if their space includes green

features? Green features -- native plantings, pollinator pathways -- create sustainable beauty. Rain gardens and permeable pavers can manage stormwater runoff. Of course, crafting a "green-in-lieu" program may go beyond current resources. However, as Bothell grows, this kind of initiative might pay off.

6. **Timeline Clarification Question** - In the introduction, page 1-7, the No Action plan adds "4,500 residents and about 4,800 jobs in new structures by **2035**." But the Business Plus plan adds "the same number of residents as the No Action Alternative (4,500) and a much higher number of jobs (17,350) by **2043**." Is there a typo in the years? I'd expect that both of these plans would add the same number of residents by the same year.

I'm excited about the Canyon Park EIS, the Live/Work Alternative, and a more sustainable Bothell!

Thank you,
Sarah Gustafson

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Fri 1/10/2020 8:15 AM

Spencer Kariniemi <spencer@redlinestech.com>

[EXTERNAL] City of Bothell Public Meeting

To Canyon Park

Retention Policy Auto Delete Inbox Message At 90 Days Old (90 days)

Expires 4/9/2020

Hello,

On behalf of the telecommunication company Level3/Time Warner who has a lot of underground conduits in the Canyon Park Business area, I wanted to get confirmation of the scope of this project, as well as the timeline.

To confirm:

1. How long until any construction starts?
2. Is this project largely concerned with modifying existing roads/sidewalks/parcels/zones to allow for future urban growth?

Thanks,

Spencer Kariniemi | Project Engineer

Waeco - Engineering Division

360.722.2852

January 13, 2020

Bruce Blackburn, Senior Planner
City of Bothell, Community Development Department
18415 101st Ave NE
Bothell, WA 98011

Re: Planned Action Draft Environmental Impact Statement for Canyon Park Subarea

Dear Bruce,

Community Transit appreciates the opportunity to provide comments on long range planning projects and current development proposals. Since land use decisions have the greatest impact on our ability to provide transit service, it is our policy to evaluate projects for their compatibility with Community Transit's current and planned future operations. The goal is ensuring the agency's ability to continue providing public transportation services in an efficient manner for Snohomish County.

Community Transit provides a significant amount of service to the Canyon Park area: bus, vanpool and transportation demand management. It has also identified the Bothell-Everett Highway as a Transit Emphasis Corridor in its Long Range Transit Plan. The most recent investment in the area was *Swift* Bus Rapid Transit (BRT) service. Community Transit's *Swift* Green Line BRT service launched in March of 2019, and already has the second highest ridership for any route in its bus network. In addition to bus service, Community Transit has 108 vanpool groups, out of 400 total groups, that travel through the Canyon Park area; and provides transportation demand managements services for nine Commute Trip Reduction sites within the Canyon Park area.

In general, Community Transit supports any of the Action Alternatives, but prefers the Live/Work and Mitigated Live/Work Alternatives. Transit is most efficient when serving areas with high land use intensities, mixed-use developments and connective walking networks. Among the key benefits for transit riders in the Action Alternatives are the proposed multi-modal infrastructure improvements in pedestrian and bicycle infrastructure as well as the concepts for micro-transit and inter-park transit shuttles. Other benefits of the Action Alternatives are the transportation improvements, including required transportation demand management strategies and programs, and improvements along 228th St SE and the Bothell-Everett Highway.

Community Transit has a few specific comments:

1. Since transportation demand management services in the area are provided by Community Transit, the agency can work with the City, employers and developers to adopt an effective mix of strategies as mitigation measures. The Action Alternatives proposal to reduce parking requirements will also encourage the alternatives to driving alone. Please consider addressing an emerging area of concern that falls generally under parking management: the use of curb

space by delivery and transportation network companies. New policies may be needed to ensure the impact of these growing services is positive for other road users.

2. A request to consider exploring the long-term potential for opening a roadway connection to the south, between 17th Ave. and 228th St., to alleviate the traffic associated with bus operations at the Canyon Park Park & Ride and the new highway toll lane access point.
3. Community Transit's bus network design will significantly change in 2024, with the arrival of Sound Transit's Link Light-rail system to Snohomish County. As this planning process is just underway and could include changes to the local bus network within the subject planning area, we request the ability to continue discussing bus infrastructure needs within the Canyon Park Subarea post plan adoption.

Thank you again for the opportunity to provide comments on the Planned Action Draft EIS, and the invitation for our agency to participate in the planning process for the Canyon Park Subarea Plan. We look forward to continuing discussions regarding the best way to serve Bothell and the Canyon Park area with quality transit service. Please feel free to contact me if you have any questions.

Sincerely,



Kate Tourtellot, AICP
Senior Transportation Planner
kate.tourtellot@commtrans.org
(425) 348-2314

cc: Community Transit Development Review Team

January 10, 2019

Bruce Blackburn, Senior Planner
Community Development
City of Bothell
18415 101st Avenue NE
Bothell, WA 98011

RE: Canyon Park Subarea Planned Action – Draft Environmental Impact Statement (DEIS)

Dear Mr. Blackburn,

I represent the Northshore School District (District) and this letter provides comments from the District on the Canyon Park Subarea Planned Action Draft EIS (DEIS). This letter represents general comments and the District looks forward to discussing the DEIS further with City staff. The District has significant capital holdings in the subarea that need to be discussed in more detail as it relates to future growth, additional housing and potential transportation improvements.

Under *1.6 Objectives* of the DEIS, there is a statement about Canyon Park being a multifaceted neighborhood. The diverse mix of uses described does not include the District's significant capital facilities located within the subarea. District facilities include: the NSD Transportation Center, Support Services Center, Secondary Academy of Success (SAS), CP6 (Leased-out building and some District warehousing) and the recently acquired CP4, which will house a future Choice High School. The transportation facility was the only District facility mapped on *Figure 1. Canyon Park Study Area*. The attached graphic depicts the location of all District facilities within the subarea. These are critical facilities for the District and should be mentioned early within the document when characterizing uses within the subarea. This is also important when referencing the subarea as a Transportation Hub, since it does contain the transportation facility (busing and support vehicles) for districtwide school use.

The District appreciates the need to address the subarea development as a regional growth center. However, both the Business Plus Alternative and the Live/Work Alternative will have impacts to the District, which will need to address/mitigate the additional residential growth and potential impacts to the transportation system. The expected new PM trips with the Live/Work Alternative are 10,900 and 9,060 new PM trips for the Business Plus Alternative. While the City is reviewing potential solutions for mitigation, it needs to be understood that the flow and access for the District's busses is critical in terms of moving students related to schedules and activities. Currently the internal roads within the Canyon Park Business Park are private. I understand, there are discussions being held with the park owners' association and the City to convert these roads to public streets. This discussion should include the District as it relates to bus trips and adequate, safe pedestrian facilities within the park. Pedestrian facilities are also an important consideration in the discussion of adding residential development within the park.

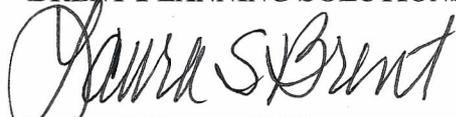
The Summary does include a discussion of schools and does state that the elementary, middle and high schools serving the study area do not have enough permanent capacity to accommodate demand at any grade levels under both growth alternatives. Page 3-173 acknowledges additional facilities would be needed to accommodate student enrollment. While the growth would be incremental as individual projects develop, the impact has not fully been addressed in the DEIS. The City should develop a plan with the District on how growth and transportation impacts can be mitigated. On-going discussions with the District would be helpful so that all parties understand impacts and potential mitigation necessary to ensure school facilities are keeping up with demands.

On page 3-146 of the DEIS is a table with Project Map Descriptions for potential transportation improvement projects. The District's Transportation Department has concerns about the plan #16 and #17. Transportation has expressed a need for a roundabout at 214th St. SE and 20th Ave. SE. Westbound traffic at 5:00 PM is so backed up in the right lane that vehicles leave an open space so vehicles in the left lane can turn right onto 20th Ave. SE. Currently it is challenging for school buses to make a turn in or out on 20th Ave. SE during peak times. Opening up 20th Ave. SE to Maltby Rd. would create additional concerns. There are already a high number of collisions in that section of Maltby Rd. between SR-527 and east of the driveway into Willow Tree Apartments. Additional traffic in front of the NSD Transportation Center would increase time and costs to the District's transportation operation. Potential revisions to the 9th Ave. SE corridor would most likely impact Crystal Springs Elementary School. Any future pedestrian improvements must include at minimum raised 5-6' sidewalk/curb with a landscape barrier and bike lane for separation, signal controlled crosswalks (228th, 226th and 217th) and parent staging/parking on 9th Ave. SE in front of the school.

As a stakeholder in the subarea, the District has participated in the various workshops and community meetings. Comments have been previously submitted to the City as part of this process. The District looks forward to more direct discussions with the City on the proposed alternatives. If I can provide any additional information on the District's comments regarding the Canyon Park Subarea Planned Action DEIS, please don't hesitate to contact me at 425.971.6409 or via email at lbrent@brentplanningsolutions.com.

Sincerely,

BRENT PLANNING SOLUTIONS, LLC

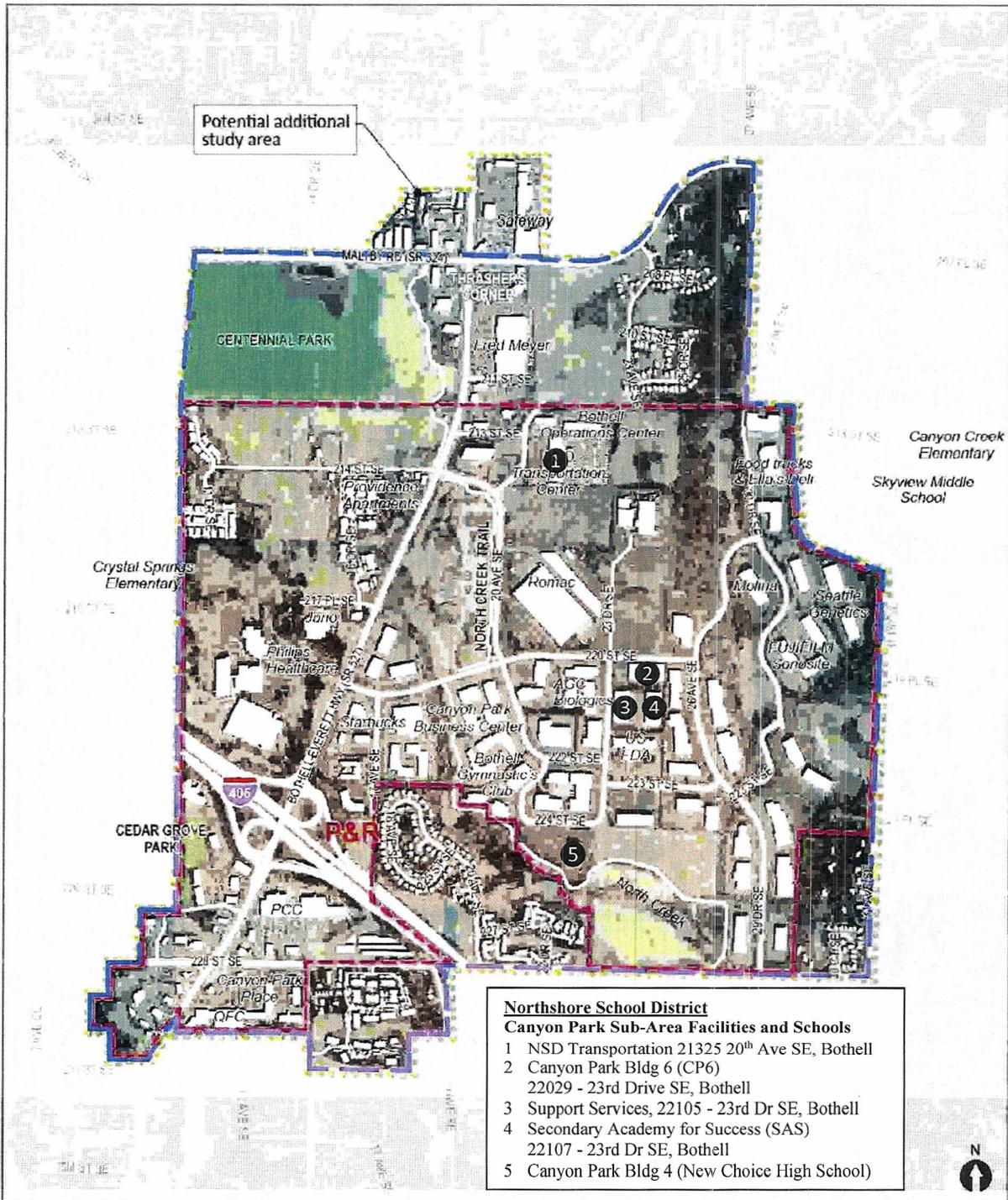


Laura S. Brent, AICP

cc: Joe Paperman, Northshore School District
Dri Ralph, Northshore School District

Attachment

Figure 1. Canyon Park Study Area



Canyon Park Study Area

0 0.125 0.25 0.5 Miles

- Canyon Park Subarea
- Regional Growth Center
- Additional area to include in study
- Park
- Wetland
- P&R Park & Ride

Source: City of Bothell, 2018; MAKERS, 2019.



January 13, 2020

Bruce Blackburn, Senior Planner
City of Bothell Community Development Department
18415 101st Ave. NE
Bothell, WA, 98011

Subject: Comment on Canyon Park Subarea Planned Action Draft EIS

Dear Mr. Blackburn:

Thank you for the opportunity to provide comments on the referenced Draft EIS. As you are aware, Sound Transit is actively developing a bus operations and maintenance facility (Bus Base North) on property within the planning areas addressed by the Draft EIS. We previously provided a scoping comment letter relative to this site, for your consideration as part of this EIS process. Bus Base North will support I-405 and SR 522/NE 145th Bus Rapid Transit (BRT) service at Canyon Park, other areas in Bothell, and the region, starting in 2024.

While Sound Transit does not specifically prefer one Draft EIS alternative over the other, it appears that the *Business Plus Alternative* may provide more flexibility to the City in meeting stated growth goals for the Canyon Park subarea, and in supporting goals for residential mixed-use transit oriented development (TOD).

Sound Transit applauds the City’s ambitious vision for the Canyon Park subarea. The Draft EIS does identify some challenges with transportation and developable land. As a partner with the City, Sound Transit is steadfast in its support of the vision of Canyon Park as a thriving PSRC Regional Growth Center (RGC). As such, Sound Transit will be eager to review the findings of the Final EIS, which will inform how land use and transportation issues will be addressed with the City’s proposed higher density development for this area.

We look forward to continuing our collaboration with the City, as we provide high-capacity transit to serve the growing needs of the community.

Sincerely,

Bernard van de Kamp
HCT East Corridor Development Director

cc: Karen Kitsis, Deputy Executive Director, Capital Project Development
Paul Cornish, Project Director—HCT Development
Andrea Tull, Senior Project Manager

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January 13, 2020

Bruce Blackburn, Senior Planner
City of Bothell, Community Development Department
18415 101st Avenue NE
Bothell, WA 98011

Sent by email: CanyonPark@bothellwa.gov; bruce.blackburn@bothellwa.gov

RE: Comments of Canyon Park Business Center Owners' Association on City of
Bothell Canyon Park Subarea Planned Action Draft EIS

Dear Mr. Blackburn:

On behalf of our clients, the Canyon Park Business Center Owners' Association ("CPBCOA"), we submit our comments regarding the City of Bothell Canyon Park Subarea Planned Action Draft EIS ("DEIS") issued on December 6, 2019.

SEPA is an environmental disclosure statute that sets forth a "state policy of protection, restoration and enhancement of the environment." *Polygon Corp. v. City of Seattle*, 90 Wn.2d 59, 63 (1978). The primary function of an EIS is to "identify adverse impacts to enable the decision-maker to ascertain whether they require either mitigation or denial of the proposal." *Victoria Tower P'ship v. City of Seattle*, 29 Wn. App. 592, 601 (1990). Under SEPA, an agency must consider both the direct, indirect, and cumulative impacts of its decision. WAC 197-11-060(4)(d).

We have reviewed the City's DEIS and are concerned that the DEIS's analysis and disclosure of impacts is inadequate in many respects. In some instances, the DEIS's own analysis indicates that the impacts disclosure is inadequate; in other instances, it is impossible to assess whether reasonable methodologies were used to assess impacts. Further, the DEIS's discussion of proposed mitigation is insufficient because the discussion is vague, unmeasurable, and speculative.

The following is a brief discussion of general concerns, followed by a discussion of concerns related to impacts and mitigation on specific topics.

1. General Comments:

- a. As noted in the DEIS, SEPA requires a statement of objectives and analysis of how well the alternatives achieve those objectives. The DEIS's discussion of how the proposal and

the alternatives achieve the defined objectives is inadequate. The DEIS affirmatively suggests the proposal will preclude some of the stated objectives, such as the objective to “improve transit access . . . , overall freeway/highway access, and multi-modal infrastructure to improve circulation within and around Canyon Park.”

- b. Given the impacts disclosed in the DEIS (and the likely additional impacts that may be discovered through adequate environmental review), Section 1.7 should be revised to include the following: “Consideration of whether a Regional Growth Center (“RGC”) is functionally and economically feasible in the Canyon Park area, given the significant constraints, impacts and required mitigations.”
- c. Pages 1-4 and 2-3 indicate that a public meeting would be held during the public comment period to analyze and present the DEIS alternatives. No such meeting was held, and the meeting with CBPCOA on January 9, 2020, though valuable, did not constitute a public meeting.
- d. The following is a summary of our concerns regarding each section of the DEIS:
 - i. Natural Environment: The DEIS does not identify potential impacts from planned projects.
 - ii. Land Use Patterns and Policies: The DEIS does not provide sufficient information to determine the adequacy of the Buildable Land Capacity Analysis and the feasibility of the projected development capacities of the Action Alternatives.
 - iii. Aesthetics and Urban Design: The DEIS does not provide sufficient information to determine the feasibility of the redevelopment based on the development standards proposed by the Action Alternatives.
 - iv. Transportation: The DEIS does not identify or mitigate potential impacts to the private road system within the CPBC, does not analyze impact from planned projects, and does not provide sufficient mitigation for identified impacts.
 - v. Public Services: The DEIS does not adequately analyze potential impacts to public services, does not use the adopted LOS standard for fire protection and EMS, and does not provide adequate mitigation for identified impacts.
 - vi. Utilities and Stormwater: The DEIS does not adequately analyze potential impacts to capacity of water and sewer utilities.
 - vii. Cumulative Impacts: The DEIS fails to discuss the cumulative impacts from planned and reasonably foreseeable projects.
 - viii. Mitigation: The DEIS does not propose adequate mitigation for identified impacts, and much of the proposed mitigation is not feasible.

Please note that the detailed discussion below provides some specific examples of these concerns.

2. Natural Environment:

- a. Page 3-19 states that the City’s critical regulations are outdated and are being updated. The DEIS Buildable Lands Capacity Analysis (the “DEIS Capacity Analysis”) should be updated to reflect the new critical area regulations, or an adjustment factor should be applied to account for larger buffer requirements and mitigation standards.
- b. The DEIS does not identify or analyze the impacts to wetlands, streams and habitat that will result from the widening of 17th Ave SE that is a component of the Washington State Department of Transportation (“WSDOT”) Express Toll Lane (“ETL”) project.

3. Land Use Patterns and Policies

a. Buildable Land Capacity Analysis (the “DEIS Capacity Analysis”):

- i. Please clarify how the DEIS Capacity Analysis has been coordinated with Snohomish County’s Buildable Lands process.
 1. Please confirm and document how the Snohomish County Buildable Lands Procedures were used for the DEIS Capacity Analysis.
 2. Please document that Snohomish County was consulted on and approved the methodologies used in the DEIS Capacity Analysis.
- ii. Residential use in the CPBC is limited to a defined area of 72.75 acres pursuant to the CPBCOA CC&Rs. For the areas proposed for Residential Mixed Use within the CPBC in the Live/Work and Mitigated Live/Work Alternatives, only 18.09 acres is within the defined area where residential use is permitted by the CC&Rs. Please revise the DEIS Capacity Analysis to eliminate residential use from those areas where it is not permitted by the CC&Rs.

iii. Partially Used Land:

1. Page 3-35 states, “Reviewing results and maps available at the time, it appears that Partially Developed Land was not identified in the 2012 Buildable Lands Report and not in the City’s capacity analysis of its 2015 R-AC additions in the Canyon Park area, shown in Figure 36.” Please refer to Exhibit 1, the Bothell MUGA Land Status Map from the Snohomish County 2012 Buildable Lands Report. It does identify “Partially-Used” land within the Canyon Park Business Center (“CPBC”) and the Study Area. If the DEIS is indicating that there were errors in the 2012 Buildable Lands Report, it is important that the DEIS and supporting appendices include documentation from Snohomish County acknowledging the errors and confirming that additional “Partially-Used” land is within the CPBC and the Study Area.
2. The DEIS includes two different and inconsistent definitions for “Partially-Used” land. Table 20, Footnote 1 (Page 3-35) of the DEIS states “Partially-Used: For commercial, industrial, and mixed use zones, the floor area ratio is usually less than 25% and the building improvement to land value ratio is greater than 100%.” On Page 3-35, the DEIS states, “The 2012 Buildable Lands Report defines Partially Developed land as developed to 25% of allowed building space even if building value exceeds more than 100% of the land value.” These are two different definitions, and the second definition is not the definition from the Snohomish County 2012 Buildable Lands Report. Please clarify which definition was used to identify “Partially-Used” land in the DEIS Capacity Analysis, and apply that definition consistently throughout the analysis.
3. Please clarify the methodology to identify, review and designate “Partially-Used” land in the DEIS Capacity Analysis.
 - a. Were parcels aggregated into Economic Units based on common ownership and shared improvements pursuant to the Snohomish County Buildable Lands Procedures? Figure 64 in the DEIS appears to provide a portion of

this analysis, but it does not appear to have been used in the capacity analysis.

- b. Consistent with the definition of “Partially-Used” in the 2012 Buildable Lands Report, was a threshold of 0.25 FAR used to determine what parcels were “Partially-Used”? If not, what threshold was used and what was the basis for this threshold?
- c. Were improvement to land value (“ITL”) ratios considered in the analysis of “Partially-Used” parcels?

Please refer to Exhibit 2, which is an analysis of the 25 parcels identified in the DEIS Capacity Analysis as “Partially-Used.” This analysis shows the following:

- Only four (4) of the 25 “Partially-Used” parcels in the DEIS Capacity Analysis are below the 0.25 FAR threshold defined within the Snohomish County 2012 Buildable Lands Report. The remaining twenty one (21) parcels range from 0.26 to 0.50 FAR. It does not appear that the 0.25 FAR threshold was used in the DEIS Capacity Analysis.
- All of the four (4) parcels below the 0.25 FAR threshold are part of larger Economic Units with other parcels under the same ownership and/or sharing site improvements (access, parking, circulation, etc.). An additional four (4) parcels that are above the 0.25 FAR threshold are part of larger Economic Units with other parcels. Since eight (8) of the 25 “Partially-Used” parcels (32%) in the DEIS Capacity Analysis are part of larger Economic Units, it appears that this fundamental analytical step of the Snohomish County Buildable Lands Procedures was not completed.
- The lowest ITL ratio of the 25 “Partially-Used” parcels is 90%. The range of ITL ratios for the 25 “Partially-Used” parcels in the DEIS Capacity Analysis is as follows:
 - Twenty four (96%) have ITL ratios greater than 100%.
 - Sixteen (64%) have ITL ratios greater than 200%.
 - Twelve (48%) have ITL ratios greater than 300%.
 - Seven (28%) have ITL ratios greater than 400%.

Based on this analysis, it appears that ITL ratios were not considered in the DEIS Capacity Analysis.

Additionally, please refer to Exhibit 3, which is an analysis of a random selection of ten (10) developable CPBC parcels that were not identified in the DEIS as “Partially-Used.” This analysis shows the following:

- The FARs of the randomly selected parcels are generally within the same range as the 25 parcels identified in the DEIS as “Partially-Used.” The lowest FAR is 0.30, and the highest FAR is 0.57.
- Seven (7) of the randomly selected parcels are part of larger Economic Units with other parcels under the same ownership and/or sharing site improvements (access, parking, circulation, etc.).
- Although it is a small sample size, the ITL ratios of the randomly selected parcels are skewed slightly lower than, but generally within the same range

as, the 25 “Partially-Used” parcels in the DEIS Capacity Analysis. The lowest ITL ratio is 136%, and the range of ITL ratios is as follows:

- o Ten (100%) have ITL ratios greater than 100%.
- o Six (66%) have ITL ratios greater than 200%.
- o Two (20%) have ITL ratios greater than 300%.
- o Two (20%) have ITL ratios greater than 400%.

Comparison of the 25 “Partially-Used” parcels in the DEIS Capacity Analysis and the randomly selected parcels does not identify a clear analytical basis for the inclusion of the former parcels in the “Partially-Used” analysis and the exclusion of the latter. Please clarify the methodologies of the DEIS Capacity Analysis so that it is clear and consistent which parcels are meet the definition of “Partially-Used” and provide a parcel by parcel assessment of the development capacity of each parcel.

- b. Please document the achieved redevelopment densities under the current development standards that were used to project future growth in the DEIS Capacity Analysis for the No Action Alternative.
- c. Page 1-36 states that the No Action Alternative does not include a minimum floor area ratio. Table 7 (Page 2-14) states that the No Action Alternative includes a minimum density of 35 DU/ac and 0.5 FAR for non-residential. Please clarify which is correct and which was used for the DEIS Capacity Analysis for the No Action Alternative, and update the analysis applying the consistent standard.
- d. Please document the market availability and land market supply factors used for vacant, re-developable and partially used land in the DEIS Capacity Analysis for all alternatives.
- e. Please document how compliance with current stormwater regulations will affect the development capacity in the Subarea. The development capacity of a “Pipeline Development” project on Parcel Nos. 27052900204600, 27052900204700, 27053000106400, and 27053000106300 has been reduced for this reason.
- f. Page 3-90 of the DEIS states, “The Canyon Park Business Center Owners Association is the largest private landholder in the area, with about 86 acres of land within the study area. These lands reflect a significant portion of land within the Canyon Park Business Park and include a significant portion of the land that would likely redevelop as part of revised planning for this area.”
 - i. The CPBCOA owns 12 parcels totaling 62.92 acres, not 86 acres as stated in the DEIS. None of the CPBCOA owned parcels are currently developable beyond their current condition, because they contain roads, trails, stormwater infrastructure, critical areas/buffers, and native growth protection easements. Were any CPBCOA owned parcels determined to be developable in the DEIS Capacity Analysis? If so, please identify those parcels?
 - ii. Figures 59 and 60 show Parcel Nos. 27052900203100, 27052900203100 and 27052900203500 as Commercial Mixed Use. These parcels are owned by the CPBCOA are not developable for the reasons stated above, which is reflected in their assessed values. These three parcels should be identified as undevelopable in these figures and excluded for the DEIS Capacity Analysis as undevelopable.
- g. To date the conceptual development standards in the Action Alternatives have not been implemented. As a result, there are no achieved densities upon which to base future

growth projections. We understand that an alternative method using building typologies was used to determine the maximum redevelopment capacity for the Action Alternatives. However, RCW 36.70A.215(3)(a) specifies that “zoned capacity of land alone is not a sufficient standard to deem land suitable for development or redevelopment within the 20-year period.” This requirement places an expectation on jurisdictions to not just assume properties will develop to their maximum densities allowed under their zoning designations, but to conduct additional analysis related to how development and redevelopment might occur to support urban capacity findings.¹ Use of a building typology analysis alone assesses only the zoned capacity of Action Alternatives and does not comply with RCW 36.70A.215(3)(a) or the 2019 Buildable Lands Guidelines. To prove that the future growth projections are feasible, the EIS needs to include:

- i. An economic analysis to determine if the proposed densities/intensities would be feasible based on these regulatory assumptions; and,
- ii. A market study to estimate potential absorption of residential mixed use and commercial mixed use over the planning period, given the location and competition within the region and the transportation constraints of the area.

Lacking these analyses to prove that the proposed development regulations can achieve the projected densities, the DEIS Capacity Analysis does not meet the requirements of RCW 36.70A.215(3)(a).

- a. The EIS should include an Appendix that shows the work behind the DEIS Buildable Lands Analysis, as required by RCW 36.70A.215 and WAC 365-196-315.

4. Aesthetics and Urban Design

- a. Table 4 shows that 68 acres are eliminated from the Live Work Alternative to result in the Mitigated Live-Work Alternative. This represents an 11.1% reduction in land area from the Live Work Alternative. However, it results in a corresponding reduction of 5,685 activity units (37.5%) from the Regional Growth Center and a reduction of 5,170 activity units (31.9%) from the full study area. Please provide documentation showing how elimination of this relatively small area can result in a disproportionately large reduction in activity units.
- b. There are inconsistencies between Figures 59 and 60:
 - i. Figure 59: Parcel Nos. 27053000106400 and 27052900204700 are shown as being more than 0.5 miles from BRT/Green Line stop.
 - ii. Figure 60: Parcel Nos. 27053000106400 and 27052900204700 are shown as being within 0.5 miles from BRT/Green Line stop.

Please resolve these inconsistencies.

- c. Of the 292.02 developable acres in CPBC, 182.23 acres (62.4%) are proposed for “Business Park” land use/zoning in all the Action Alternatives and are greater than a ½ mile radius from a BRT/Green Line stop. The proposed development standards for this area in the Action Alternatives are summarized as follows:
 - i. No height increase
 - ii. Minimum density of 0.5 FAR

¹ Page 33, *Buildable Lands Guidelines – Review and Evaluation Program*, 2018, Department of Commerce.

- iii. Approximately 33% parking reduction for office use; no change to parking for light industrial use
- iv. Affordable retail space requirements
- v. Common open space requirements
- vi. Wetland/stream buffer enhancement requirements
- vii. Compliance with current stormwater regulations
- viii. Increased impact fees to fund transportation, parks and public services required as mitigation for the impacts of the Subarea Plan

On balance, these development regulations in the Action Alternatives do not appear to result in sufficient increments of additional capacity over the existing zoning in the No Action Alternative. While the parking reduction could result in additional capacity, that benefit appears to be offset by additional costs of the other new development standards, particularly the stormwater standards.

Further, the DEIS does not propose any substantial public investment to correct existing transportation deficiencies or to create meaningful public space improvements to mitigate impacts and attract private investment. While employment has grown in the CPBC, that growth has occurred within existing buildings, although the methods and sources for that data is not cited in the DEIS. No significant commercial or mixed use development or redevelopment has occurred, despite the City's past amendments to the Comprehensive Plan and development regulations. The lack of development or redevelopment indicates that private investment is satisfied with returns on existing assets in the CPBC and is unwilling to accept the risks of redevelopment. Given the patterns of recent employment growth and the lack of redevelopment activity in the CPBC, please clarify how these new standards will result in large scale redevelopment to achieve the increase in job growth that is projected in the DEIS.

- d. Of the 292.02 developable acres in CPBC, 109.79 developable acres (37.6%) are proposed for Commercial Mixed Use in the Business Plus Alternative and for Residential Mixed Use land use/zoning in the Live/Work and Mitigated Live/Work Alternatives. These parcels are within a ¼ or ½ mile radius of a BRT/Green Line stop, and the development standards vary based on these two radii. The proposed development standards for these areas in the Action Alternatives are summarized as follows:
 - i. Additional 10 feet in height for mixed use office and residential mixed use
 - ii. Reduced parking:
 - 1. Within ¼ mile radius: Residential = 43% reduction; Office/Retail = 40% reduction
 - 2. Within ½ mile radius: Residential: 32% reduction; Office/Retail: 25% reduction; Light Industrial: No reduction
 - iii. Affordable housing requirements
 - iv. Affordable commercial space requirements
 - v. Public space requirements
 - vi. Requirements for a new "neighborhood center street"
 - vii. Ground floor retail requirements
 - viii. Wetland/stream buffer enhancement requirement
 - ix. Compliance with current stormwater regulations
 - x. Increased impact fees to fund transportation, parks and public services

On balance, these new development regulations appear to result in a moderate increment of additional capacity over the existing zoning. However, these moderate increases to capacity appear to be offset by additional costs of the other new development standards. The DEIS does not propose any definitive public investment to correct existing transportation deficiencies or to create meaningful public space improvements to attract private investment. While employment has grown in the CPBC, that growth has occurred within existing buildings, although the methods and sources for that data is not cited in the DEIS. No mixed use or midrise development has occurred, despite the City's past amendments to the Comprehensive Plan and development regulations. Despite the regional housing shortage and the fact that it is permitted under the existing zoning, mixed use or mid-rise development has not occurred in the Canyon Park area, signaling that there is insufficient demand, such development is economically infeasible, or both. Given the patterns of recent employment growth and the lack of redevelopment activity in the CPBC, please clarify how these new standards will result in large scale redevelopment to achieve the increase in job growth that is projected in the DEIS.

- e. Page 1-8 states that affordable housing will be required "where development capacity increases." The DEIS does not provide a proportionality analysis of new requirement for affordable housing relative to the increased development capacity. This would allow property owners and potential developers to understand the net effect of the new development standards.

5. Transportation

a. CPBC Private Roads:

- i. Despite our scoping comments, the DEIS does not provide any analysis of the traffic impacts to intersections and capacity of the CPBC private street system.
- ii. As discussed further below in the Cumulative Impacts section, the failure to analyze the CPBC's interior roads and planned and foreseeable projects results in a failure to analyze probable significant transportation impacts.
- iii. A select zone analysis was performed for the CPBC but is not documented in the DEIS. The assumptions with regard to these conclusions are of paramount importance to the CPBCOA.
- iv. The proposed extension of 220th Ave SE to SR524 (Table 3, Figure 83, Table 48, and Table 50) requires City acceptance of the CPBC private roads or condemnation.

- b. It appears that the DEIS transportation analysis has not been coordinated with the WSDOT ETL project. The DEIS traffic model must be adjusted based on the current and final projected volumes from the WSDOT ETL project. Preliminary directional traffic forecasts prepared by WSDOT with the DAR in 2045 indicate an increase in directional traffic flow on 17th Avenue SE of between 600 and 770 vehicles per hour just by construction the DAR ramp itself. Combined with other existing traffic flows, peak directional traffic forecasts by WSDOT on this two-lane linkage would range between 1,100 and 1,300 vehicles per hour without any of the Action Alternatives evaluated in the DEIS by the City of Bothell. A capacity analysis of 17th Ave SE should be performed to determine if the projected volumes exceed the vph capacity of the proposed two-lane linkage.

- c. The DEIS concludes that the currently adopted Comp Plan (No Action) would not meet the City's adopted concurrency standards by 2045 and would fall even further into non-compliance with GMA required concurrency on multiple corridors (on average throughout three primary corridors of SR 527, SR 524, 228th Street SE) with any Action Alternative. On a majority of these corridors, LOS delay could not even be measured under any Action Alternatives (beyond maximum limits of LOS F conditions), even with identified mitigation. This conclusion indicates that the DEIS should consider additional mitigation measures for these transportation impacts, but the DEIS fails to consider additional measures
 - d. The DEIS concludes that even under reduced buildout within the RGC and consideration of both programmatic demand measures and new transportation infrastructure (e.g., construction of several new local arterial connections), significant adverse transportation impacts would result. This finding suggests the RGC should not be planned or adopted in this location, at least without additional mitigation.
6. Public Services
- a. The DEIS analysis of current police services does not acknowledge that the CPBC is not regularly patrolled at present because of the private road system. Police response to this substantial part of the RGC is provided exclusively based on calls for service. Please revise the analysis.
 - b. The existing City-wide Fire Protection and EMS response times do not meet the established level of service ("LOS") standard of 7 minutes, 15 seconds for 90% of calls for service. The DEIS does not analyze how these response times will be affected in the Subarea as a result of the projected LOS F for the majority of intersections and corridors under the No Action and Action Alternatives. Please analyze the impacts to Fire Protection and EMS LOS resulting from the street system in the Subarea not meeting LOS standards.
 - c. The DEIS does not analyze the Parks LOS for the Subarea and only analyzes City-wide Parks LOS, both for existing conditions and the DEIS alternatives. Since the PROS Plan establishes walking distances for different types of park facilities, the DEIS should analyze how the Subarea currently complies with those distance standards as part of the assessment of the existing Parks LOS. Based on those distances and the relative scale of Parks LOS impacts resulting within the Subarea compared to the City as a whole, corresponding mitigation in the form of City financed and maintained parks should be proposed. Please revise the analysis.
 - d. The DEIS does not use the City of Bothell's adopted Fire Protection and EMS LOS standard of response times as a threshold of significance. Instead, on Page 3-168, the DEIS arbitrarily selects a different LOS standard of firefighters per 1,000 population. The use of this alternate LOS standard in the DEIS is not consistent with the Bothell Comprehensive Plan. Please revise the analysis to use the adopted LOS standard of response times.
 - e. The DEIS acknowledges that the City does not meet its adopted Fire Protection and EMS LOS. This is the existing deficiency, despite the fact that the City collects fire impact fees, has a capital facilities planning/budgeting process, has proceeds from an adopted bond to fund Fire Protection and EMS, and has experienced increased tax revenues since

the recession. The proposed DEIS mitigations for impacts to Fire and Emergency Services include all of these existing funding options. Please clarify how existing funding options will mitigate impacts to Fire and Emergency Services when the existing deficiency shows their inadequacy to maintain the adopted Fire Protection and EMS LOS.

- f. The DEIS acknowledges that the City does not meet its adopted Parks LOS. This is an existing deficiency, despite the fact that the City collects park impact fees, has a capital facilities planning/budgeting process, has an adopted PROS Plan to guide capital investment, has received federal grants for PROS projects, and has experienced increased tax revenues since the recession. The proposed DEIS mitigations for impacts to Parks include all of these existing funding options. Please clarify how existing funding options will mitigate impacts to when the existing deficiency shows their inadequacy to maintain the adopted Parks LOS.

7. Utilities and Stormwater

- a. On Page 3-192, the DEIS identifies that additional analysis of Alderwood Water and Wastewater District (“AWWD”) may be necessary to review the planned incremental improvements by AWWD. The DEIS is unclear whether short term growth in the Subarea under the alternatives can be supported by the sewer conveyance and collection system without major sewer capital improvement projects. This analysis needs to be completed prior to issuance of the FEIS in order to confirm that this will not be a constraint on the growth projected within the Subarea.
- b. The DEIS is unclear whether the North Creek Interceptor and Trunk Line has sufficient capacity beyond 2030. The capacity of the North Creek Interceptor and Trunk Line was based on the Bothell Comprehensive Plan and zoning regulations in place at the beginning of the current 30 year planning period in 2000. Of the DEIS alternatives, the No Action Alternative is likely the closest to the 2000 Bothell Comprehensive Plan and zoning regulations. The DEIS does not analyze the impacts on the capacity beyond 2030. Please revise the capacity analysis of the North Creek Interceptor and Trunk Line for the entirety of the 20 year planning period of the Subarea Plan.
- c. As a mitigation measure for the Business Plus, Live/Work and Mitigated Live/Work Alternatives, the DEIS recommends updates to the AWWD Comprehensive Plan and system modeling. It is unclear why the Subarea Plan and DEIS are not being coordinated with AWWD to ensure that water and sewer system capacity is adequate to support the growth projected as a result of these alternatives. Deferring this coordination to a future update after the FEIS and the adoption of the Subarea Plan creates potential adverse impacts and risks. Growth in the short and medium term could be affected, and the costs of required water and sewer infrastructure could make development projects economically infeasible. Finally, until the preferred alternative has been determined to be consistent with AWWD’s planned system growth and capital plans, it is not possible to conclude whether the impacts exceed the defined thresholds of significance for Utilities in the DEIS.

8. Cumulative Impacts

- a. SEPA requires a discussion of cumulative impacts. WAC 197-11-060. The DEIS fails to analyze a number of planned and reasonably foreseeable projects, including but not limited to projects planned by WSDOT and Sound Transit, and the City's current proposal to establish minimum densities and intensities in designated activity centers and R-AC zones. These projects will directly and adversely affect CPBC and should be analyzed in the DEIS.

9. Mitigation

- a. SEPA requires a discussion of the intended environmental benefits of mitigation measures, and if there is concern about whether a mitigation measure is capable of being accomplished, a discussion of the measures' technical feasibility and economic practicability. WAC 197-11-440(6)(c)(iv). The DEIS's mitigation discussion generally fails to meet this standard.
- b. The DEIS concludes that even with reduced buildout and implementation of the DEIS's mitigation measures, significant adverse transportation impacts will result. This conclusion indicates that the DEIS should consider additional mitigation measures, but the DEIS fails to consider additional measures. Moreover, it is likely that many of the mitigation measures proposed are not capable of being accomplished in a reasonable timeframe, and there is no discussion of the measures' feasibility and practicability.
- c. Much of the mitigation proposed for the Aesthetics and Urban Design (Page 3-82) and Socioeconomic (Page 3-99) impacts are proposed to be accomplished by City capital investment, public private partnerships, and incentives for housing and commercial affordability. The DEIS does not adequately detail these proposed mitigations, does not commit the City to providing them, and does not document how these mitigations will result in the private investment that is assumed in the growth projections.
- d. The mitigation proposed in the Public Services section relies on existing funding options, which are currently resulting in existing deficiencies. Despite the known deficiencies, the DEIS fails to consider additional measures.

In conclusion, we have significant concerns about the DEIS's analysis and conclusions. As detailed above, significant portions of the DEIS's analysis, including foundational assumptions and analysis, are either inadequate or appear to be erroneous. Additionally, the findings of significant adverse impacts and existing failures to meet established LOS standards suggest that an RGC is not appropriate for this location. The discussion of mitigation is largely speculative and inadequate, and fails to provide decision-makers with enough information to reasonably determine whether the impacts can be mitigated. We look forward to reviewing the Final EIS and hope that our comments are addressed.

We also have significant concerns about the proposed use of the Planned Action process here. Because planned actions are not subject to new environmental analyses, the planned action's impacts must be adequately addressed in the EIS. Given all of the deficiencies in the DEIS, this level of environmental analysis cannot support supplanting project-level SEPA review. The DEIS has not adequately analyzed the probable impacts even on a broad level, much less at the project-specific level.

Thank you for your consideration. Please let me know if you have questions or would like to discuss these issues in greater detail.

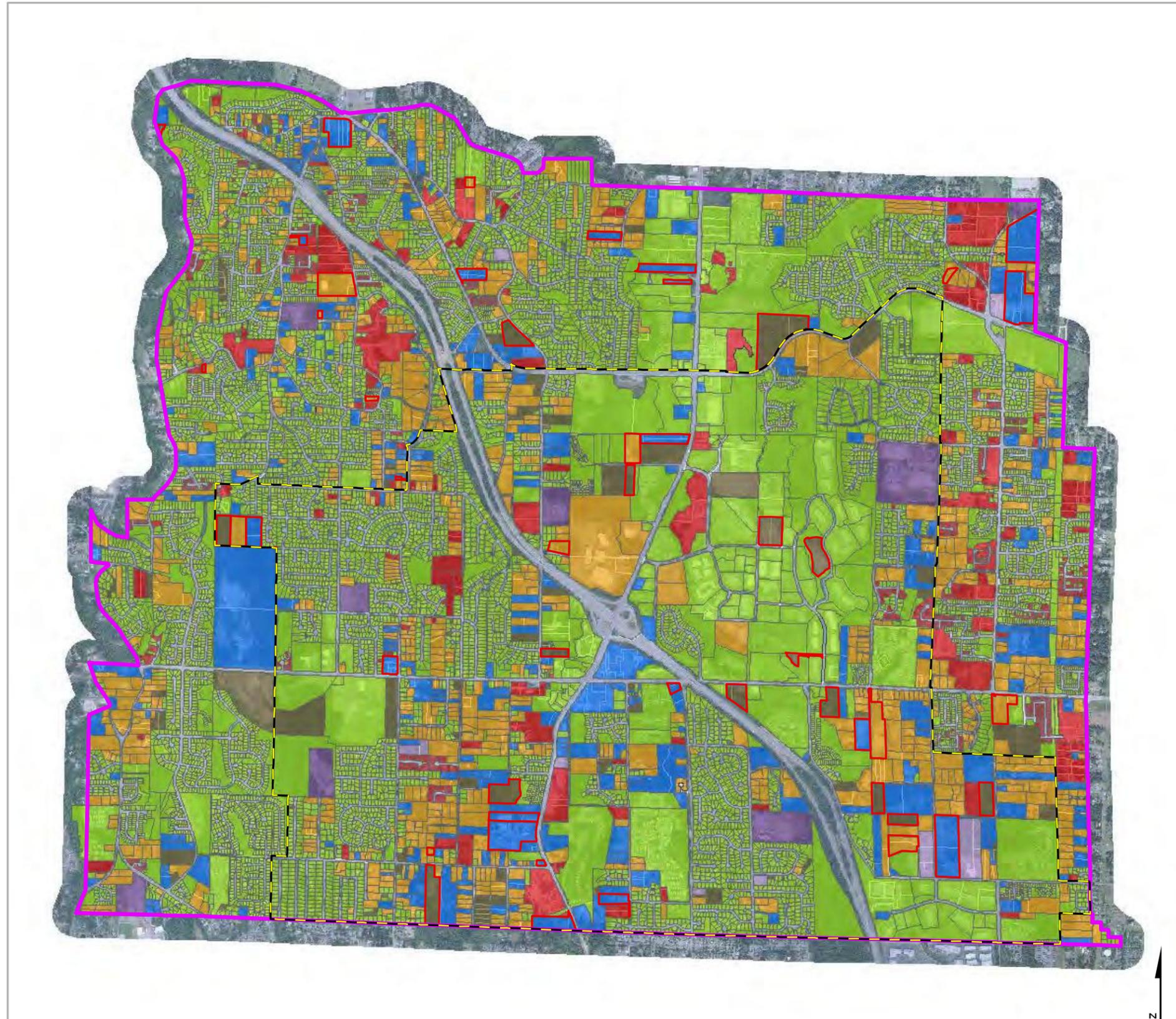
Sincerely,

A handwritten signature in blue ink, appearing to read "Molly", with a horizontal line extending to the right.

Molly A. Lawrence

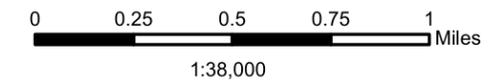
CC: Michael Kattermann (by email: michael.kattermann@bothellwa.gov)
Jeff Smith (by email: jeff.smith@bothellwa.gov)
CPBCOA Board
Tim McHarg
File

Land Status



Legend

- UGA or MUGA Boundary
- City or Town Boundary
- Assessor Parcels April 2011
- 2011 Aerial Imagery
- Land Status Overlays**
- Market Ready
- Land Status**
- Constant / Replacement
- Partially-Used
- Pending
- Redevelopable
- Religious Uses
- School
- Special
- Vacant



Snohomish County
Final BLR 12/27/2012
 Planning and Development Services
 3000 Rockefeller Ave.
 Everett, WA 98201

All maps, data, and information set forth herein ("Data"), are for illustrative purposes only and are not to be considered an official citation to, or representation of the Snohomish County Code. Amendments and updates to the Data, together with other applicable County Code provisions, may apply which are not depicted herein. Snohomish County makes no representation or warranty concerning the content, accuracy, currency, completeness or quality of the Data contained herein and expressly disclaims any warranty of merchantability or fitness for any particular purpose. All persons accessing or otherwise using this Data assume all responsibility for use thereof and agree to hold Snohomish County harmless from and against any damages, loss, claim or liability arising out of any error, defect or omission contained within said Data. Washington State Law, Ch. 42.56 RCW, prohibits state and local agencies from providing access to lists of individuals intended for use for commercial purposes and, thus, no commercial use may be made of any Data comprising lists of individuals contained herein.

EXHIBIT 2:

Parcels Classified as "Partially Used" in DEIS Figure 37

	Parcel No.	Parcel Area (acres)	Building (square feet)	FAR	Improvements Value ¹	Land Value ¹	ITL Value Ratio ²	
FAR < 0.25	1	27052900403400	8.46	68,960	0.19	\$7,677,100	\$5,886,900	130%
	2	27053000402100	2.21	18,034	0.19	\$2,432,300	\$2,687,700	90%
	3	27052900300300	2.72	27,800	0.23	\$3,259,700	\$2,025,300	161%
	4	27053000403900	6.92	72,793	0.24	\$8,542,400	\$4,959,800	172%
FAR >= 0.25	5	27053000105500	9.44	105,854	0.26	\$12,701,800	\$6,712,100	189%
	6	27052900302500	5.92	66,420	0.26	\$12,189,200	\$4,249,800	287%
	7	27052900203700	7.06	80,199	0.26	\$8,727,700	\$4,983,400	175%
	8	27052900302200	15.5	177,300	0.26	\$18,385,900	\$10,909,400	169%
	9	27053000402200	1.53	17,954	0.27	\$2,540,200	\$1,919,800	132%
	10	27052900101500	4.62	63,900	0.32	\$11,676,600	\$3,352,400	348%
	11	27052900101300	4.12	60,000	0.33	\$9,106,300	\$2,998,600	304%
	12	27052900200900	5.87	86,148	0.34	\$16,659,200	\$4,222,600	395%
	13	27053000403800	5.82	87,330	0.34	\$11,036,000	\$3,614,800	305%
	14	27052900100500	13.89	210,072	0.35	\$23,525,600	\$9,810,800	240%
	15	27052900201700	9.74	149,100	0.35	\$15,788,600	\$5,530,200	285%
	16	27052900101400	5.21	82,180	0.36	\$15,529,300	\$3,761,700	413%
	17	27052900203600	16.16	266,002	0.38	\$16,646,500	\$11,389,500	146%
	18	27052900101000	6.72	112,575	0.38	\$2,100,600	\$362,400	580%
	19	27052900100800	10.27	173,130	0.39	\$29,616,200	\$7,287,800	406%
	20	27053000401800	3.32	56,952	0.39	\$8,359,800	\$3,945,200	212%
	21	27052900303400	1.74	31,809	0.42	\$5,623,200	\$1,340,800	419%
	22	27052900401300	9.76	181,008	0.43	\$32,074,800	\$6,929,600	463%
	23	27052900301400	5.86	110,700	0.43	\$25,609,100	\$4,215,400	608%
	24	27052900303200	4.48	93,404	0.48	\$19,679,600	\$3,252,500	605%
	25	27053000402400	2.02	43,800	0.50	\$6,838,600	\$1,902,400	359%
Total		169.36						

CPBC Total Area	382.6	
CPBC Total Net Developable Area	283.45	59.7% of CPBC Developable Area
Total # of CPBC Developable Parcels	60	41.7%

Comments:

Part of Economic Unit: Same ownership (Canyon Park 228 LLC) and shared improvements with 27052900401500.
 Part of Economic Unit: Same ownership (Plaza at the Park LLC) and shared improvements with 27053000401700 and 27053000402200.
 Part of Economic Unit: Same ownership (BRE WA Office Owner LLC) and shared improvements with 27052900303600 and 27052900202100.
 Part of Economic Unit: Same ownership (Canyon Park Owner LLC) and shared improvements with 27052900302200.

Public Ownership: Northshore School District. Proposed new alternative high school.

Part of Economic Unit: Same ownership (Canyon Park Owner LLC) and shared improvements with 27052900302200.

Part of Economic Unit: Same ownership (CMC ICOS Biologics Inc) as 27052900203000 and 27052900302300.

Part of Economic Unit: Same ownership (CIO Canyon Park LP) as 27052900301400.

Part of Economic Unit: Same ownership (CIO Canyon Park LP) as 27052900303200.

Excludes government ownership, CPBCOA roads, sensitive area tracts, and NGPE areas
 Excludes government ownership, CPBCOA roads, sensitive area tracts, and NGPE areas

Notes:

1. Source: 2020 assessed values from Snohomish County Assessor.
2. ITL Value Ratio = Improvements to Land Value Ratio

EXHIBIT 3:

Random Selection of Ten Developed CBPC Parcels Not Classified as "Partially Used" in DEIS

	Parcel No.	Parcel Area (acres)	Building (square feet)	FAR	Building Value ¹	Land Value ¹	ITL Value Ratio ²	
FAR >= 0.25	1	27052900301200	2.46	31735	0.30	2,731,900	1,839,100	149%
	2	27052900203000	2.00	27031	0.31	3,255,700	1,526,200	213%
	3	27052900303600	3.28	46121	0.32	4,301,700	2,414,300	178%
	4	27052900301000	1.56	23816	0.35	1,652,800	1,212,500	136%
	5	27052900304300	3.87	59338	0.35	8,001,000	2,824,800	283%
	6	27052900201300	3.23	50425	0.36	5,910,800	2,381,200	248%
	7	27052900302400	4.13	70718	0.39	13,761,500	3,010,000	457%
	8	27052900300700	3.90	74750	0.44	7,073,700	2,846,800	248%
	9	27052900301800	1.57	32977	0.48	2,057,200	1,136,800	181%
	10	27052900300200	3.59	89300	0.57	14,068,800	2,634,200	534%

Comments:

Part of Economic Unit: Same ownership (Little Neck Properties LLC) and shared improvements with 27052900300700.

Part of Economic Unit: Same ownership (CMC ICOS Biologics Inc) as 27052900303400 and 27052900302300.

Part of Economic Unit: Same ownership (BRE WA Office Owner LLC) and shared improvements with 27052900300300 and 27052900202100.

Part of Economic Unit: Same ownership (Canyon Park Owner LLC) and shared improvements with 27052900304300.

Part of Economic Unit: Same ownership (Little Neck Properties LLC) and shared improvements with 27052900301200.

Part of Economic Unit: Same ownership (Carbine Creek LLC) and shared improvements with 00742100000400.

Part of Economic Unit: Same ownership (BRE WA Office Owner LLC) and shared improvements with 27052900202000.

Notes:

1. Source: 2020 assessed values from Snohomish County Assessor.

2. ITL Value Ratio = Improvements to Land Value Ratio

 Reply  Reply All  Forward



Fri 12/13/2019 9:55 AM

Gresham, Doug (ECY) <DGRE461@ECY.WA.GOV>

[EXTERNAL] Comments on Canyon Park subarea plan DEIS

To Canyon Park

Retention Policy Auto Delete Inbox Message At 90 Days Old (90 days)

Expires 3/12/2020

Bruce,

As a wetland specialist at Ecology I wish to add my comments to the scoping document for the Canyon Park subarea plan draft environmental impact statement (DEIS).

I want the DEIS to cover environmental topics such as, the North Creek watershed, storm water management, wetland preservation and restoration, and water quality protection. There are problems in the North Creek watershed such as flooding, sediment deposition that is threatening infrastructure, and water quality degradation. Future development in the North Creek watershed should incorporate storm water management features that detain and treat runoff in exceedance of Ecology's 2019 storm water management manual requirements. The existing impervious surfaces in this watershed is already causing flooding and erosion problems so any future development needs to reverse this trend.

For example, the North Creek Maintenance District Association has requested permits from the U.S. Army Corps of Engineers and Ecology to repair levees near the NE 195th Street bridge because there is too much sediment deposition that is threatening the bridge. This sediment deposition is caused by excessive storm water runoff that is eroding stream banks. Periodic dredging of the North Creek channel at bridge crossings is not a long-term solution to this problem. There is too much storm water flowing off too much impervious surfaces, not enough detention pond capacity, and not enough riparian vegetation to stabilize stream banks.

The City of Bothell should require any new development or redevelopment within the Canyon Park subarea to address these storm water management issues. This includes:

1. Requiring both conventional and innovative storm water features such as detention ponds, rain gardens, underground treatment vaults, infiltration ponds, bioswales, pervious pavement , etc.
2. Encouraging the preservation and restoration of riparian vegetation along North Creek to help stabilize the stream banks.
3. Require the removal of existing structures from the North Creek floodplain whenever possible to provide more flood capacity.
4. Promote the creation of regional storm water facilities that detain and treat storm water, to augment the private developers storm water facilities.
5. Encourage the creation of more open space parcels within the North Creek watershed to increase groundwater infiltration, reduce storm water runoff, and improve water quality.

Thank you for the opportunity to comment and please contact if you have any questions.

Doug Gresham, Wetland Specialist
Washington State Department of Ecology
3190 - 160th Ave. SE
Bellevue, WA 98008
Phone: (425) 649-7199
Email: Doug.Gresham@ecy.wa.gov



 Reply  Reply All  Forward



Mon 1/13/2020 3:17 PM

Karen Walter <KWalter@muckleshoot.nsn.us>

[EXTERNAL] Canyon Park Planned Action Draft Environmental Impact Statement

To Bruce Blackburn

Retention Policy Auto Delete Inbox Message At 90 Days Old (90 days)

Expires 4/12/2020

Bruce,

We have reviewed the Planned Action Draft Environmental Impact Statement for the Canyon Park Subarea Plan referenced above. We offer the following comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources:

1. Stream Crossing and culvert upgrades

The City should complete an inventory of all stream crossings in the planning area (public and private) to determine where existing barriers exist for adult and juvenile salmon. A plan to replace known barriers should be implemented regardless of the no-action or action alternatives. Table 15 in Vol 1 of the DEIS implies that only some action alternatives will potentially improve some of the crossings. There is no mention of doing any inventory work either. WDFW has completed assessments of some of the crossings in the planning area and has information about replaced culverts that arguably provide adult and juvenile salmon access. See <https://geodataservices.wdfw.wa.gov/hp/fishpassage/index.html>

The City is likely aware that WSDOT is currently working on some of its barrier culverts along I-405 as part of its court injunction requirements under U.S. v. Washington. We expect culverts up and downstream of any replaced culverts on I-405 to be made fish passable in a timely manner so that salmon access can be restored improving survival and production.

2. North Creek levee/floodplains

The DEIS states on page 3-13:

These well-vegetated streambanks as supplemented by armoring result in relatively stable banks and the rate of channel migration and associated erosion is expected to be limited as shown in Figure 30. Where bank erosion does occur, actions will likely be taken to the extent needed to prevent significant channel migration and thereby protect existing development and associated infrastructure.

None of the alternatives discuss the potential to set existing levees along North Creek back, avoid new levees, and otherwise improve connectivity between the stream and its floodplains. Levee setbacks in Puget Sound streams and rivers have been shown to improve floodplain conveyance, storage, and habitat conditions for salmon.

North Creek and its tributaries are amenities in this subarea. This subarea plan is an opportunity to restore natural stream processes and functions to the fullest extent (versus project by project) and particularly given the Planned Action intent of this environmental review which will limit or eliminate further environmental review as the plan is implemented.

3. Floodplain mapping

The subarea needs to ensure that it is using the most up-to-date floodplain mapping. In our experience, FEMA maps can lag 10 years or more all the while growth and development that affects groundwater recharge and streamflows continue. Now is the time for a comprehensive flood map update if one hasn't occurred recently.

4. Beaver management

Similarly, now is the time for a comprehensive beaver management plan that follows mitigation sequencing. Lethal beaver removal should be the last option in the suite of actions. A comprehensive floodplain mapping, levee setback analysis and beaver management

5. Stormwater management

The stormwater management assessment in the DEIS is too broad and there is no discussion or consideration of Low Impact Development measures that could be implemented per each alternative. It seems logical that there were could be differences between each of the alternatives regarding the extent and/or type of LID measure(s) that could be implemented. Some items require larger areas of land to be implemented and may be precluded due some of the alternative priorities and/or in particular locations within the subareas.

6. Stream and stream buffer mitigation

The DEIS notes a likely need for stream buffer mitigation. We strongly encourage to look at options to restoring stream buffer functions in North Creek and its fish-bearing/potential fish bearing streams before considering any offsite options. As part of this comment, we highly recommend that the City map all existing compensatory wetland and stream mitigation sites to determine where these locations are that could be further enhanced by other mitigation efforts.

We appreciate the opportunity to review this proposal and look forward to the City's responses to these concerns.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division Habitat Program
39015 172nd Ave SE
Auburn, WA 98092
253-876-3116



January 13, 2020

Bruce Blackburn, Senior Planner
City of Bothell, Community Development Department
18415 101st Avenue NE
Bothell, WA 98011

Dear Mr. Blackburn:

Thank you for the opportunity to comment on the City of Bothell's Canyon Park Subarea Planned Action Draft Environmental Impact Statement (DEIS). This letter provides the Washington State Department of Transportation (WSDOT)'s compiled comments on the DEIS, representing the perspectives of WSDOT's I-405/SR 167 Megaprogram, Regional Transit Coordination Division, and Northwest Region.

WSDOT appreciates the ongoing coordination with the City regarding transportation improvements in the Canyon Park area, including the proposed I-405, SR 522 Vicinity to SR 527 Express Toll Lanes Improvement Project. This project, which is currently in the preliminary engineering and environmental review phase, will provide a new express toll lane (ETL) direct access ramp and inline transit station at 17th Avenue SE in support of Sound Transit's proposed new I-405 Bus Rapid Transit system, as well as local street and active transportation improvements. Close coordination between WSDOT and the City of Bothell will need to continue as both parties progress with concurrent environmental analyses that pertain to the Canyon Park area.

WSDOT provided comments during the scoping period for the DEIS, including considerations for transportation, land use, and traffic assumptions. As described in the more detailed comments that follow, WSDOT has several questions and comments about the approach, assumptions, and data used for the DEIS alternatives analysis.

Level of Service (LOS) Standards

- WSDOT sets level of service standards for highways of statewide significance (HSS) based on RCW 47.06.140(2). For this DEIS, HSS facilities include I-405 and any associated ramps in the study area. SR 527 and SR 524 are designated as regionally significant highways (non-HSS), and LOS standards are adopted by WSDOT, Puget Sound Regional Council (PSRC), and local agencies. WSDOT maintains that any operational or other impacts from the proposed action to HSS facilities (I-405 ramp terminals) would need to be mitigated. WSDOT is opposed to any proposal that would lower the LOS standards at the I-405 ramp terminals.
- The DEIS should clarify what LOS standards apply to this subarea. If the standard for SR 524 and SR 527 is not LOS "E/mitigated" per PSRC, please

provide reasons why. The PSRC LOS standards (see: <https://www.psrc.org/level-of-service>) for LOS “E/mitigated” include the following description: “The standard for Tier 1 routes is LOS ‘E/mitigated,’ meaning that congestion should be mitigated (such as transit) when p.m. peak hour LOS falls below LOS ‘E.’” If this is the standard being used, the DEIS should provide more information about mitigation.

- The City should consider best practices in the development of transportation systems management and operations (TSMO) and transportation demand management (TDM) strategies for the Canyon Park and additional performance metrics.

Traffic Analysis of PM Peak Only

- The DEIS only provides an analysis of the PM peak period. What is the City’s rationale for not analyzing the AM peak period? Will the AM peak period be analyzed for a preferred alternative once identified?
- WSDOT requests that the City at a minimum analyze the AM peak period for the I-405 ramp terminals and adjacent intersections because WSDOT needs to understand how the City’s proposal would affect this HSS facility.

Traffic Analysis Project Assumptions

- The future transportation network considered in this DEIS included several projects that are not assumed in WSDOT’s traffic modeling for the I-405, SR 522 Vicinity to SR 527 Express Toll Lanes Improvement Project Environmental Assessment (EA). WSDOT did not include these projects in its analysis because they are not currently funded for construction. Although these differences in assumptions are appropriate for the respective environmental documents, they will likely lead to differing traffic analyses and results. To better understand these differences, the document, including Tables 2, 3, 48, and 50, should identify whether the listed projects are funded, planned, or newly proposed.
 - In addition, the DEIS references the I-405 projects in several different ways throughout. Please list the WSDOT projects in the I-405 corridor as the “I-405, SR 522 Vicinity to SR 527 Express Toll Lanes Improvement Project” and the “I-405, SR 527 to I-5 Express Toll Lane Project.” The SR 522 to SR 527 project, which is funded, would add one ETL in each direction of I-405 between south of SR 522 and SR 527, as well as build direct access ramps at SR 522 and near SR 527 at 17th Avenue SE. The SR 527 to I-5 project, which is currently not funded, would add one ETL in each direction of I-405 between SR 527 and I-5.
 - Please consider adding “ST3, I-405 BRT Project” to Tables 2, 48, and 50 for consistency with Table 41, which lists I-405 BRT as a project that will be completed by 2043.

Traffic Analysis for the Privately Owned Street Network

- The description of all of the action alternatives includes the possibility of transferring the private street network owned by the Canyon Park Business Center (CPBC) to public ownership; however, all of the proposed mitigation projects are at the periphery of the regional growth center (RGC). What motorized and active transportation mitigation is proposed within the RGC interior street network with the additional projected jobs/population?
- Because the privately owned, internal CPBC intersections were not analyzed (see Figure 79), WSDOT cannot assess impacts that each land use alternative may have on the new I-405 direct access ramp, SR 527 corridor, and surrounding roadway network. Page 3-119 of the DEIS states, “Once a preferred alternative has been defined, implications to the business park’s private street system can be addressed.” Is the City planning to analyze the private street network as part of developing a preferred alternative and issuing a Final EIS? If so, what opportunities would be provided for the public and WSDOT to comment on the proposal?
- Please note that the information provided previously by WSDOT and included in DEIS Appendix D was a preliminary analysis to facilitate the ongoing discussions with the CPBC Owners Association. This information was not requested by or provided to Bothell for public dissemination or inclusion in the DEIS as it may change as we continue the WSDOT analysis. We request that you remove this information. The results of the WSDOT traffic analysis will be included as part of our EA, anticipated to be published in June 2020.

Transit Oriented Development (TOD) and TSMO

- The document and the plan for the subarea would benefit from additional focus on TOD and TSMO. WSDOT suggests adding more narrative about the transportation-land use interaction. For example, how will the City plan the areas around the transit stations to boost BRT ridership and use of active transportation modes and decrease the need to use a car for local errands? The City should consider adding a section to discuss the areas around the two stations through a TOD lens, including a comparison of the effectiveness of residential mixed use and mixed business concepts. The document would also benefit from including visual concepts of a TOD neighborhood at this location and details on the building, set back, sidewalk, and pathway characteristics that support TOD within the walking radius.
- WSDOT uses a “transportation system management and operations (TSMO) first” philosophy that prioritizes high quality transit, active transportation, travel demand management, and mobility on demand. Figure 6 on Page 1-16 somewhat reflects this concept, but further discussion is needed throughout the document.

Specific Comments

- **Page 1-6:** Please clarify the intent of Objective 1, particularly 1.2. Is the City aiming to increase transit service and multi-modal access?
- **Page 1-16:**
 - **Paragraph 1:** Does the analysis assume that future average vehicle occupancy continues at the current rate of 1.x? Please clarify the assumptions.
 - **Paragraph 1:** How does the LOS comply with the City's adopted LOS standards? See LOS discussion above. Please clarify this point and describe the performance targets should be described in this paragraph.
 - **Paragraph 2:** Please clarify the trip generation methodology, including whether adjustments were made for BRT, other active transportation modes, and other factors.
 - **Bullet list of potential mitigations:** Is the City considering mitigating with high capacity transit, increased density, TDM strategies, and TSMO strategies? What alternative LOS standard or policy is the City proposing?
 - **Figure 6:** This figure appears to say that lower activity units per acre decrease LOS. Is this correct? Lower density often results in higher VMT, which is at odds with the stated objectives.
- **Page 1-21:** Are the measures discussed in the text on this page listed in priority order? If so, WSDOT suggests transit should be listed first and considered the primary mitigation before any projects that enhance general purpose traffic capacity.
- **Page 1-37:** What method is being used for the greenhouse gas analysis?
- **Page 1-38:** LOS standards should be introduced and defined earlier, with the discussion on page 1-16.
- **Page 1-40, last paragraph:** This is the first time that the document discloses that the transportation analysis focuses on vehicle use. Please introduce this information earlier on Page 1-16.
- **Page 2-17:** Regarding multimodal infrastructure, is the City considering strategies that increase frequency, capacity, reliability, and hours of BRT/high capacity transit? Is the City considering strategies that improve access to stations?
- **Page 3-83:** The Aesthetics and Urban Design section mentions potential development of other park and rides in the mitigation measures for the Mitigated Live/ Work Alternative. The potential for new park and rides is not mentioned in other sections of the DEIS. If the City is considering this mitigation measure, it should also be analyzed in other sections in the DEIS.
- **Page 3-103, Figure 67:** This figure title indicates the data year as 2015, the legend indicates 2017, and the source line below indicates that they are from the *Imagine Bothell... Comprehensive Plan*, which we understand to show

average daily traffic from 2014 (though the document was published in 2015). Please clarify the data year used.

- **Page 3-109, Figure 68:** Based on WSDOT data, the SR 527/524 intersection currently operates poorly in the PM peak period (LOS F). The northbound approach is over capacity and regularly has queues that extend back to the I-405 interchange now. WSDOT suggests revisiting existing and future PM peak operations at this location, with attention to whether counts taken by the DEIS team represent demand or just constrained throughput. Similarly, the SR 527/220th Street SE intersection fails today, with westbound queues typically extending well east of 20th Avenue SE. As noted earlier in this letter, WSDOT also requests that AM peak operations be analyzed at the I-405 ramp terminals.
- **Page 3-102:** The first bullet indicates that the major roadways through the subarea have “recurrent, peak hour commute congestion.” If only the PM peak hour was analyzed, PM peak hour should be specified in this statement.
- **Page 3-110:** The Canyon Park Park and Ride utilization is indicated here as “90% occupancy on a typical weekday.” This is a lower percentage than WSDOT has observed. In particular, WSDOT has understood from Community Transit staff that the lot is typically 100 percent occupied by 6:45 a.m. on weekdays.
- **Page 3-122:** The statements regarding direct access ramp operations for each alternative need to be supported with data and analysis.

If you have questions or need clarifications about these comments, please contact Barrett Hanson with the I-405/SR 167 Program at 425-456-8534.

Sincerely,



Kim Henry, PE
I-405/ SR 167 Program Administrator

BH:ab