

Testimony to SSDP hearing for ELST Segment 2B

From Sammamish HomeOwners (SHO)

The interim ELST crosses many streams and is immediately adjacent to many wetlands. This means that the trail crosses many stream and wetland buffers. The 60% plan largely ignores City development code for trails within these buffers. SHO believes particularly relevant paragraphs of 21A.30.210 Trail corridors – Development standards, to be as follows:

21A.30.210(1), Use of Existing Corridors, states that “Trails should generally be located along existing cleared areas ...”

21A.30.210(3), Width, states that “The width of the cleared area, trail corridor, surface and shoulder should be designed consistent with AASHTO standards ...”

21A.30.210(4), Sensitive Areas and Buffers, states that “Trail impacts to sensitive areas should be reviewed consistent with the impact avoidance and mitigation sequencing requirements of Chapter 21A.50 SMC. **Mitigation of impacts is required, even for trails located on existing corridors** consistent with subsection (1) of this section...” (emphasis added)

With the currently cleared area for the interim trail not being as wide as the County’s 60% design, claimed to be required to meet AASHTO guidelines, there is a conflict that requires resolution.

Regarding the AASHTO guidelines:

Ref. “AASHTO Guide for the Development of Bicycle Facilities, 2012”

From page 5-3, the minimum paved width for a shared-use path is 10 feet with a typical range of 10 to 14 feet, and the wider values applicable to areas with high use.

From further down on page 5-3, a path width of 8 feet may be used for a short distance due to a physical constraint such as an environmental feature, bridge abutment, utility structure, fence, and such.

From page 5-4, the upper diagram shows the width of the sections to either side of the paved center section to be 2 feet.

From page 5-5, the minimum width of the graded shoulder areas to each side of a paved trail is 2 feet.

So the total minimum width of a trail according to AASHTO is 14 feet (2+10+2), with 12 feet (2+8+2) allowed for short distances.

From King County's Trail Demand Analysis and Trail Width Analysis, the County claims that 12 feet of paving is required for the anticipated weekend volume of above 600 users per hour. Recognizing that this is only a volume estimate, it should be noted that this means that on average someone is crossing a given point on the trail every 6 seconds – an absurdly high estimate.

The trail footprint in the County's 60% plans is 18 feet wide, even in stream and wetland buffers. The extra two feet consist of two 1-foot clear zones on each side of the trail. Clear zones are not part of the AASHTO guidelines. Eliminating two feet of the trail width along the entire length of the trail preserves nearly an acre (36,960 sq. ft.) of the shoreline environment.

Mitigation Sequencing

Thus there is a conflict between the county's design and what AASHTO allows in environmentally sensitive areas. The resolution to this conflict lies in mitigation sequencing. Washington State law requires that mitigation sequencing be followed. Mitigation is the third step in the sequence in order of priority. The first step is to avoid the impact and the second step is to minimize the impact. Therefore the width of the trail within stream and wetland buffers must be reduced to the AASHTO minimum of 14 feet before any mitigation is even considered. In areas where the existing interim trail is less than 14 feet wide, mitigation should be required.

Conclusion

The SSDP should be conditioned to restrict the width of the trail to 14 feet within stream and wetland buffers, and a MAXIMUM width elsewhere of 16 feet – 12 feet of paving with 2 feet of graded shoulder on each side of the paving.

Presented by Reid Brockway, SHO board member