

Doug McIntyre

From: Don Gerend <don@gerend.com>
Sent: Tuesday, July 28, 2020 3:27 PM
To: EIS
Subject: RE: EIS Scoping Comment
Attachments: Scope of EIS comments 7282020.docx

[CAUTION - EXTERNAL EMAIL]

Attached are my comments regarding the Scope of the Transportation Level of Service & Capital Facilities Environmental Impact statement.

Best regards,
Don Gerend
22730 SE 23rd Pl. Sammamish, WA 98075

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July 28, 2020

RE: EIS Scoping Comment, Transportation Level of Service & Capital Facilities

Dear Mayor Moran and City Councilmembers:

In response to your request for comments on the scope of the environmental impact statement, I do have some corrections and suggestions to the scope and the checklist:

Regarding the Checklist;

1. In section 2 Air, (a). it is stated "Cumulatively, the planned growth in Sammamish together with regional growth in the Puget Sound Regional Council's (PSRC) land use vision model..." **Question:** What is the planned growth in Sammamish? Suggest putting specific numbers in here.
2. In Section 5 Animals, (b). "List any threatened and endangered species known to be on or near the site. Threatened and endangered species include:.....Kokanee". **Comment:** Although I have always supported the efforts to preserve the late run of kokanee in Lake Sammamish, technically it is not on the U.S. Fish and Wildlife Service threatened or endangered species list.
3. In Section 8. Land and Shoreline Use, where it states "including applicable state and regional plans and policies" **Comment:** I suggest specifying PSRC Vision 2040 and Vision 2050 Draft here since these are the underpinnings of regional visioning strategies on how individual cities and counties handle the 1.8 million population increase and significant growth of jobs over the next 30 years in the four county Central Puget Sound.
4. In Section 8, (l) which asks for "Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any;" the answer given is "No significant adverse impacts are anticipated." **Comment:** This is certainly true if the alternative chosen is "no action", but if the V/C methodology is selected it is hard to understand how that is compatible with existing and projected land uses and plans.
5. In Section 9 Housing it states "The EIS evaluation of the proposal and alternatives will consider potential impacts to overall housing supply, variety to meet diverse needs, and affordability to meet the needs of all economic segments of the community ." **Comment:** The PSRC and King County specifically call for meeting the demographic needs of the populace, so would suggest changing the statement to "...all economic **and demographic** segments of the community."
6. In Section 9 Housing (b) it asks approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income." **Comment:** I interpret this to mean not from the construction of roads but from the requisite changes to land use to make the alternatives in sync with the Comp Plan, etc. Certainly, in the "no action" alternative there would be no impact. With the V/C methodology, since it is designed to

have concurrency test failure for any significant new development, without facilities to mitigate the failure, I would presume that the City's intention is to have thousands of units eliminated.

Regarding the Scope in general:

1. I agree with the comments presented by the Master Builders Association of King and Snohomish County (MBAKS). Specifically they suggest "determining the objective or the purpose of the non-project action". In the case of the City trying to make the Comp Plan and regulations conform to the ad-hoc concurrency V/C methodology seems to be the objective; the LOS standards are so restrictive as to have no reasonable way of passing the concurrency tests. Since this is explicitly contrary to the Washington Administrative Code, the goal would seem to be to change the Comp Plan to allow no further growth.
2. The emphasis should be placed on "providing a range of housing choices and affordability" which includes housing choices for all demographic sectors of Sammamish. By choices I mean condos of various size, quality and amenities. There are many Sammamish citizens that can afford condos at any price (after all, Sammamish has the highest percentage of household incomes over \$100,000 than any significant city in the US), either by exchanging their high valued large single family home or by cashing in some of their investments. I would suggest, along these lines, another alternative which supports Paul Stickney's concept of Enrich and Sustain as outlined "Petition of Actions" document, as posted on the Civic Web for the July 14th 2020 Council Meeting written public comments.
3. I suggest very strong emphasis be made to simply drop "V/C" LOS standards and rely on the 2019 intersection based concurrency ordinance which is a very restrictive ordinance and probably very cost-effective for the City to plan for potential transportation facilities failures which arise from the concurrency program. With the post-pandemic world probably entailing much more home-based tech jobs, the commute out of Sammamish might never get back to the congestion levels pre-pandemic, so why set up a concurrency system based on pre-pandemic conditions? For the most part, pre-pandemic congestion in Sammamish was caused by backups from choke points outside the City limits. I strongly encourage special consideration be given to managing future traffic demands by optimizing housing and economic land-uses within Sammamish, as outlined in the enrich & sustain growth solution approach.
4. I would recommend not changing the Comp Plan to conform with a very subjective V/C methodology which has had its capacity numbers heavily based on arbitrary policy subjectivity instead of expert objectivity. The City's strict intersection-based methodology conforms to the currently adopted Comp Plan and the Town Center Sub-area Plan adopted in 2008 after a very thorough public process. That Town Center Plan was to absorb about half of the housing and most of the job targets anticipated, thereby reducing the impacts on existing neighborhoods, but also providing a community center

so important for a residential city (per the emphasis of the Town Center public planning process, our current Comprehensive Plan, King County Planning Policies, PSRC regional planning documents Vision 2040 and draft Vision 2050 and the Growth Management Act).

5. If the City moves forward with changing the Comp Plan to be consistent with the future adoption of a V/C-based Concurrency System, there must be a thorough review of how the additional concurrency system will affect the City's growth targets in light of existing land uses, how the City will finance needed capital improvements identified in using the new concurrency system, and an evaluation of the likelihood of the City meeting its growth targets if the cost for capital improvements is too high.

Sincerely,

Don Gerend, Sammamish