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To: Shoreline Planning Commission

From: Tharsis Law P.S.
Jeremy Eckert

Date: June 6, 2019

RE: ROIC Comment Letter: Planned Action Ordinance Amendment

Request.

ROIC requests that the Planning Commission ask staff to provide the materials identified in the attached Heffron Transportation Study before advancing the ordinance to City Council. ROIC also requests that City Staff reconfirm that the Planned Action Ordinance has additional capacity after considering the updated information and after accounting for the trips attributed to Merlone Geier's proposed Development Agreement.

Analysis.

The Planned Action Ordinance ("PAO") and the proposed Merlone Geier Development Agreement must work together to encourage Shoreline Place redevelopment. Shoreline Place redevelopment will slow or stall if Merlone Geier's project monopolizes the trip capacity under the PAO.

As background, the City intends to use the PAO to encourage the redevelopment of Merlone Geier's holdings and other holdings at Shoreline Place. The Staff Report for the Development Agreement specifies that there is significant capacity remaining in the PAO:

It is staff's hope the environmental study performed in the Planned Action, and certainty as to specific mitigations required of developers, will encourage other property owners to advance renewal plans of their own. Renewal of significant portions of the adjacent properties can still occur within the Planned Action, capacity of which will be 67% after MGP's redevelopment.¹

ROIC asked Heffron Transportation Inc. ("Heffron") to confirm whether the 67% capacity remains following approval of the proposed Development Agreement. The Heffron Study concludes: "The MGP Shoreline Place project with a Transportation Analysis by TENW3 showed

¹ Staff Report for Development Agreement for the June 6, 2019 Planning Commission meeting, p. 4. (emphasis added).

a year 2039 total PM peak hour traffic volume (entering and exiting the site) that would **exceed** the amended trip thresholds in the PAO (see Figure 3 of the TENW report).”²

The PAO cannot encourage additional redevelopment at Shoreline Place if the Merlone Geier project exceeds the trip thresholds.

The Heffron Study identifies outstanding data that is needed to determine if the PAO has additional capacity once the Merlone Geier project is approved. ROIC respectfully requests that the Planning Commission ask for the analysis identified in the attached Heffron Report before advancing this ordinance to City Council.

² Heffron Transportation Study dated June 5, 2019.

TECHNICAL MEMORANDUM

Project: Aurora Square
Subject: Review of Draft Planned Action Ordinance
Trip Generation Thresholds
Date: June 5, 2019
Author: Marni C. Heffron, P.E., P.T.O.E.

I have reviewed the City of Shoreline's Staff Report for *Ordinance 863: Minor Amendments to Aurora Square Planned Action Ordinance (PAO)*.¹ The minor amendments related to the trip generation thresholds that were presented in the same project's Environmental Impact Statement (EIS) Addendum.²

Both the PAO Amendment and the EIS Addendum corrected the PM peak hour trip generation table, presumably to remove "internal trips" from the totals. However, no backup calculations have been provided. Given the magnitude of the PM peak hour trip reduction in trips (nearly 36% for Alternative 3), it is likely that both internal and pass-by trips have been removed from the revised table. While this would be appropriate for disclosure in the EIS Addendum, the PAO should include the pass-by trips to make monitoring the site's overall trip generation easier in the future, which could be accomplished with site cordon counts.

Without a change to the PAO, the first project reviewed for "Transportation Consistency"—the Shoreline Place project with a Transportation Analysis by TENW³—showed a year 2039 total PM peak hour traffic volume (entering and exiting the site) that would **exceed** the amended trip thresholds in the PAO (see Figure 3 of the TENW report). This is because the driveway trips include both primary trips to the site as well as pass-by trips.

Therefore, I recommend the following prior to the PAO being adopted:

- The underlying trip generation calculations that show the total, internal, and pass-by trips be made public; and
- That the PAO include details about the assumed pass-by trips and total trips at the site driveway(s) to improve the ability to monitor future trips with simple site cordon counts.

¹ For Planning Commission Meeting on June 6, 2019.

² City of Shoreline, *Addendum to Aurora Square Planned Action Draft Environmental Impact Statement and Final Environmental Impact Statement*, March 8, 2019.

³ Transportation Engineering NorthWest (TENW), *Shoreline Place – Transportation Consistency/Traffic Impact Analysis*, December 19, 2018.

