

From: [Gina Clark](#)
To: [EIS](#)
Subject: Draft EIS Comment: BLUMA
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[MBAKS Comments Sammamish BLUMA DEIS September 24 2021.pdf](#)

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Attached, please find MBAKS draft EIS comments for the BLUMA.

Sincerely,
Gina Clark



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Comments, Sammamish BLUMA DEIS

September 24, 2021

Master Builders Association of King and Snohomish Counties

On behalf of our nearly 2,600 members dedicated to improving housing supply, affordability, and choice in the Puget Sound region, the Master Builders Association of King and Snohomish Counties (MBAKS) is pleased to submit these comments to the “Sammamish Balanced Land Use and Mobility Analysis (BLUMA) Draft Environmental Impact Statement (DEIS),” issued by the City of Sammamish in August 2021.

MBAKS, with the assistance of LDC, Inc., has reviewed those areas of the BLUMA focused on land use and housing, the relationship to the four alternatives, and conducted a high-level assessment of each alternative, and whether the proposed alternatives comply with the State Environmental Policy Act (SEPA) requirements (WAC 197-11) and goals as outlined in the Growth Management Act (GMA), RCW 36.70A.020.

Alternatives

The BLUMA outlines four specific alternatives. These are:

Alternatives	Key Features
1 – No Action	Continuation of transportation Level of Service (LOS) standards and concurrency program requirements
2 – Transportation LOS Standards	<ul style="list-style-type: none">• Continuation of LOS standards for intersections and new LOS standards for key roadway corridors and segments• Improvements to transportation infrastructure to meet LOS standards
3 – Transportation LOS Standards with transportation-efficient land use measures	<ul style="list-style-type: none">• Same LOS standards for intersections and key corridors and roadway segments as Alternative 2 with an assumed 15% reduction in peak hour trips• Land use measures to reduce overall travel demand• Improvements to transportation infrastructure to meet new LOS standards
4 – Transportation LOS Standards with transportation-efficient land use measures and holistic transportation capacity improvements	<ul style="list-style-type: none">• Same LOS standards for intersections and key corridors and roadway segments as Alternative 2 with an assumed 15% reduction in peak hour trips• Same land use measures as described in Alternative 3• Transportation capacity improvements intended to address transportation needs holistically, considering local and regional connectivity, improvements to substandard

	streets, transit and non-motorized needs, and environmental constraints <ul style="list-style-type: none"> • Improvements to transportation infrastructure to meet new LOS standards
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Alternative 1 – No Action

Alternative 1, determined as the “no action” alternative, retains the existing transportation LOS standards and concurrency program requirements. This means that the city will maintain the status quo to assess land use applications against the city’s current Traffic Concurrency Review (TCR).

The BLUMA indicates no changes to land use designations, policies, or regulations would be proposed for this alternative. However, for consistency with transportation LOS standards and existing concurrency program requirements, this alternative would require amendments to the Comprehensive Plan (Comp Plan), specifically removing references to the LOS standards and concurrency requirements.

Assessment of Alternative 1

Alternative 1 would maintain the existing LOS concurrency evaluation method. This means other than targeted identified at 3 key intersections out of 43 total in the city, it is reasonable to assume that LOS standards would not significantly improve throughout most of the city’s roads and intersections. As a result, development proposals submitted for review by the city would continue to “fail” concurrency evaluations. Limited to no additional development/housing permits would be issued and housing/growth targets, while maybe still achievable at some point, would be significantly slower than other proposed alternatives.

Non-Compliance with SEPA/GMA

If Alternative 1 is chosen as the preferred alternative, the status quo would be maintained and the city would not be addressing the Planning Goals of the GMA (RCW 36.70A.020), specifically Items 1 (Urban Growth), 3 (Transportation), and 4 (Housing). By choosing a “No Action” alternative, the city would be continuing to promote the same limited growth options by failing development projects based on the city’s very restrictive LOS modelling while also continuing to perpetuate limited-to-no-growth, not providing for various types or choices of housing development at varying densities, and not attempting to meet the planning goals of the GMA including linking transit and walkability to more dense housing in designated urban areas.

Alternative 2 – Transportation Level of Service (LOS) Standards

This alternative retains the existing transportation LOS standards and concurrency program for most of the city and focuses new LOS standards for only key roadway corridors and segments. Infrastructure improvements would occur along these key roadway corridors and segments, identified as Principal and Minor Arterials, and limited only to those listed on Exhibit 1-13 and shown on Exhibit 1-14. Corridors and segment LOS would be measured on volume to capacity (V/C) ratios. Key intersection improvements would occur at those listed on Exhibit 1-8.

The BLUMA indicates no changes to land use designations, policies or regulations would be proposed for this alternative. Comp Plan amendments would be necessary to establish consistency with transportation LOS standards and concurrency program requirements. These amendments include updates to the Transportation Element, specifically the description of LOS standards and concurrency management program, baseline data for the corridors and segments, and updates to the Capital Facilities Element for these items. Updates would also be needed to the Sammamish Municipal Code

(SMC) to update to establish new LOS standards, new concurrency corridors and segments and updated concurrency management program.

Assessment of Alternative 2

Alternative 2 concurrency projects, which are focused on few roadway corridors and segments in the city, are limited to those that are considered gateways to the city. These include those along both the north and south ends of East Lake Sammamish Parkway, the south end of Issaquah-Pine Lake Road, Duthie Hill Road, and the north end of Sahalee Way NE. Three other locations in this alternative focus on intersection-only improvements.

The selection of this alternative would mean that other than targeted improvements along gateway corridors to key intersections, identified at 8 roadway segments out of 43 total in the city, LOS standards would only be improved at those limited specific locations, mainly gateways, and select intersections. The remainder of the city's roadways and intersections would not improve and as a result, development proposals submitted for review by the city would again be denied by "failing" concurrency evaluations. While a slight improvement to Alternative 1 – No Action, because of the limited scope of system improvements, most development /housing permits throughout the city would likely continue to be denied, thus limiting housing/growth targets for all varieties of housing.

Non-Compliance with SEPA/GMA

If Alternative 2 is chosen as the preferred alternative, as noted above, most of the city's roadway infrastructure would not be improved, would only focus on key gateways, and would still be subject to "failing" concurrency standards. Therefore, the city would continue to not address the Planning Goals the GMA (RCW 36.70A.020), specifically Items 1 (Urban Growth), 3 (Transportation), and 4 (Housing). Effectively, by choosing an Alternative 2, the city would be continuing to promote the same limited growth options by failing development projects based on the continued restrictive LOS modelling, while also continuing to perpetuate limited to no growth, not providing for various types of housing development, at varying densities, and thus, again, not attempting to meet the planning goals of the GMA.

Alternative 3 – Transportation LOS Standards with Transportation-Efficient Land Use Measures

Alternative 3 assumes the same LOS standards and concurrency management program as Alternative 2 while including additional land use measures intended to reduce travel demand and assuming reduced peak hour travel demand. Infrastructure improvements would again occur along the same key roadway corridors and segments and intersection improvements as identified in Alternative 2 and listed on Exhibits 1-15 and 1-16 and shown on Exhibit 1-17. Corridors and segment LOS would continue to be measured on volume to capacity (V/C) ratios.

The major difference between this alternative and Alternative 2 is the assumption that AM and PM peak hour will be 15% less than historic levels due to the city's resident labor force working from home. This labor force driving habit change is assumed in part due to both the effects of the COVID-19 pandemic as well as the high number of information technology workers (i.e., Microsoft, Google, Facebook, etc.) working from home and thus not putting pressure on the city's road network.

The city also conducted a "open online survey" which asked residents whether they were working from home or returning to the office. The city noted in this section of the BLUMA that not the survey is not statistically significant, and therefore was not conducted using statistically valid methods. Additionally, the city noted that traffic counts were monitored in late 2020 at seven gateway locations, at which AM

peak hours trip were on average 45% percent lower and PM peak trips were 30% percent lower compared to historic data.

The BLUMA also referred to a Washington State University survey of Pacific Northwest businesses on whether employees would continue to work from home or return to the office. The survey cited over two-thirds of business leaders reporting to continue working from home at the conclusion of the pandemic. What this information does not assume is housing choice, now or in the future or a diverse residency. No other type of housing, or residents, that exist other than what or who exists today. More affordable townhomes, cottage, condo, attached/detached dwelling units (ADU/DADU), apartments, mixed use, subsidized housing, that not only offers more housing choice and affordability, but perhaps more diverse residents whose jobs, work environments, and daily lives do not allow work from home options and require transportation alternatives.

The BLUMA narrative notes that 10-11% of new units (half of units not otherwise in development pipeline) will be comprised of smaller residential units, including small-scale single-family detached units, townhomes, or duplexes. Amendments would be necessary to the SMC, specific to establishing incentives, dimensional standards, design standards, and other associated amendments to implement the alternative. Examples cited include maximum building footprint or maximum lot size controls, and incentives to promote townhomes and duplexes through minimum lot sizes or reduced setback requirements, something Sammamish has not embraced to-date. Like Alternative 2, Comp Plan amendments would be necessary to both the Transportation and Capital Facilities Elements regarding LOS standards, concurrency requirements, and identified capital improvement projects reflecting LOS standards.

Lastly, the narrative notes the analysis was based on the City's 2006-2035 growth target, adopted by the City Council, and significantly less than originally estimated County demographers through the King County Countywide Planning process and is almost non-existent when it comes to job growth. They note a total of 885 units remaining between 2019 and 2035 to meet its own defined growth targets.

Assessment of Alternative 3

Like Alternative 2 concurrency projects, improvements are focused on roadway corridors and segments that are gateways to the city. These are focused on the north end of East Lake Sammamish Parkway, the south end of Issaquah-Pine Lake Road, and Duthie Hill Road. The south end of East Lake Sammamish and the north end of Sahalee Way projects, as identified in Alternative 2, have both been removed for this alternative. The same intersection improvements as identified in Alternative 2 remain in this alternative.

The selection of this alternative would effectively mean, again, that other than targeted improvements along gateway corridors to key intersections, identified at only 5 roadways segments out of 43 total in the city, LOS standards would only improve at these specific locations, mainly gateways, and select intersections. The remainder of the city's roadways would not greatly improve.

In addition to Alternative 2, the city assumes a 15% reduction in PM peak hour trips. They also note this assumption is a "conservative estimate." This is a very general assumption, at best, stating that with a relatively large share of IT workers who would work with home, trips would be reduced and therefore impacts to the road network would also be reduced. This assumed level of reduction is not based on any specific formula and is no more than arbitrarily picking a number. It is also based on a very narrow, exclusive lens.

The city also referred to a non-statistically valid survey that mentioned a “44% of respondents reported working from home.” Again, this is based off a survey that is “not statistically significant” (pg. 1-24), and while COVID-19 certainly has changed some travel behavior nationwide, a survey of a small segment of the Sammamish population does not mean travel behavior has changed city-wide. They also referred to traffic counts taken at seven gateway locations in early 2021 showing a reduction in both AM and PM peak hours trips. While this method more accurately represents travel behavior versus an arbitrary survey, traffic patterns are known to fluctuate and do not necessarily mean that traffic counts will remain reduced. Changes in various factors over time, including but not limited to local and regional job and housing market, changes in work behavior, changes in non-work travel over time (i.e., shopping online vs. in-person), and changes in demographics over time are just a few ways traffic patterns may change. These factors, among other societal factors, combine to alter travel behavior.

To assume that because these selected corridor and intersection improvements and reductions in travel demand will lead to less travel and thus improve LOS on the city’s road network is short-sighted and does not consider the city-wide and regional changes the Puget Sound is experiencing (i.e., land values and housing demand, which has not shown any indication of slowing). Additionally, throughout the document the city is promoting “small-scale single family detached, townhomes, and duplexes,” assuming that “around 10-11% of new units will be comprised of smaller residential units, while ignoring the fact that a large portion of the city’s existing residential stock is large single-family detached units with over 3,000-4,000 square feet of living space. Vehicle trips vary greatly depending on varying factors and not totally associated to unit type or size. Therefore, this is a difficult metric to assess.

Non-Compliance with SEPA/GMA

If Alternative 3 was chosen as the preferred alternative, as noted above, most of the city’s roadway infrastructure would not be improved, would only focus on key gateways, and would still be subject to “failing” concurrency standards. Even with the City’s assumptions outlined above, which as noted are difficult to fully legitimize based on arbitrary assumptions, LOS and concurrency analysis will be questionable. As a result, like Alternative 2, the city may continue to not address the Planning Goals the GMA (RCW 36.70A.020), specifically Items 1 (Urban Growth), 3 (Transportation), and 4 (Housing). By choosing Alternative 3, while still promoting for small single-family residential, townhomes, and duplexes and providing various housing options, the housing development industry would still be at risk of the city failing development projects based on the LOS modelling, thus limiting growth, limiting various types of housing development, at varying densities, and thus not attempting to meet the planning goals of the GMA.

Alternative 4 – Transportation LOS Standards with Transportation-Efficient Land Use Measures and Holistic Transportation Capacity Improvements

Alternative 4 assumes the same LOS standards and concurrency management program as Alternative 2 and the same land use measures and 15% reduction in AM and PM peak hour travel demand as Alternative 3, while including a set of transportation capacity improvements that would improve connectivity and efficiency in the network. Additionally, a set of transportation capacity improvements that will improve connectivity and efficiency in the transportation network are included. Transportation capacity improvements would address transportation needs holistically, considering local and regional connectivity, improvements to substandard streets, transit and non-motorized needs, and environmental constraints. These improvements are listed in Exhibit 1-18 and Exhibit 1-19 and shown on Exhibit 1-20. Proposed LOS standards for intersections and corridors and segments would continue to be assessed like that listed in alternatives 2 and 3. The concurrency management program would also be the same as alternatives 2 and 3.

Alternative 4 would now include improvements at 5 intersections and 14 corridor segments, including two of which are located outside the city limits and would require coordination with other jurisdictions (King County and City of Issaquah). The alternative also assumes full build-out of Sahalee Way, 228th Avenue NE and SE, Issaquah-Pine Lake Road, and Issaquah-Fall City Road.

Like Alternative 3, Alternative 4 also assumes a 15% reduction in AM and PM peak hour travel demand, for which the arbitrary nature of this reduction is noted above in the Alternative 3 narrative.

Assessment of Alternative 4

Like Alternative 3 concurrency projects, improvements are focused on roadway corridors and segments that are gateways to the city, but also include major improvements including full buildout of major corridors including Sahalee Way, 228th Ave NE and SE, and Issaquah-Fall City Road. This alternative, while not a full build-out of all principal and minor arterials throughout the city, is the most comprehensive improvement program and would serve the greatest amount of need.

One of the major challenges with this Alternative, as pointed out previously, is that two segment improvements would require coordination with other jurisdictions, notably for the northern end of Sahalee Way (King County) and southern end of Issaquah-Pine Lake Road (City of Issaquah). As is the case with any interjurisdictional project, there are challenges that may arise, including but not limited to project scopes and budget, permitting, environmental reviews, and public process and sentiments. These factors, among others, may certainly impact the timing and completion of these corridors. The further these projects get delayed, proposed development may also be delayed because of risk of concurrency “failing” since the improvements yet to be completed.

Non-Compliance with SEPA/GMA

Like Alternative 3, if Alternative 4 was chosen as the preferred alternative, as noted above, most of the city’s roadway infrastructure would not be improved, would only focus on key gateways, and would still be subject to “failing” concurrency standards. Continuing to utilize Alternative 3’s assumptions, which as noted are difficult to fully legitimize based on arbitrary assumptions, LOS and concurrency analysis will be questionable. As a result, like Alternative 3, the city may continue to not address the Planning Goals the GMA (RCW 36.70A.020), specifically Items 1 (Urban Growth), 3 (Transportation), and 4 (Housing). By choosing Alternative 3, while still promoting for small single-family residential, townhomes, and duplexes and providing various housing options (which the city has yet to take active steps to implement in its Comp Plan, SMC, or even in dialogue with the community or homebuilding industry), the housing industry would still be at risk of the city failing development projects based on the LOS modelling, thus limiting growth, limiting various types of housing development, at varying densities, and thus not attempting to meet the planning goals of the GMA.

Another point, and no less noteworthy since it comes at the end of these comments, is all the alternatives place the Town Center at risk for minimal to no development. The Town Center, which in many ways is the centerpiece of the community with the civic campus, parks, mixed-use development, and other city amenities, would continue to be at risk because of the restrictive nature of the concurrency program. In fact, it appears that in all the alternatives, the Town Center, with its variety of housing choice, supply, affordability, walkability, transit-oriented development, and economic development, and while complying with all design and environmental standards, would be at risk of minimal to no development.

Statements for All Alternatives

The City mentions in the DEIS that Alternatives 2, 3, and 4 would all incur added development costs and permit review requirements. Additionally, a delay in construction of transportation improvement projects could hinder implementation of the city's overall capital improvement program, thus impacting its ability to manage growth. Residential development in the city could be delayed and, as a result, impact the city's compliance with the GMA by not meeting the Planning Goals of 36.70A.020.

In addition, since the city mentions in the DEIS that a delay in construction of transportation improvement projects could hinder implementation of the city's overall capital improvement program, thereby impacting the city's ability to manage growth and further delaying residential development, it should be noted the city has consistently failed, until 2019, to produce a Transportation Improvement Program (TIP). This means the city has legally failed under the GMA to 1) identify transportation projects 2) fix failures within six years 3) identify sources of funding or 4) create a plan for doing so. This has led to a backlog of transportation projects, lack of funding, and mismanagement and delays by the city further exacerbating its failed compliance with the GMA.

Furthermore, in the absence of a regular, consistent TIP process, how does the city identify projects, accurately fund them, and include them in concurrency calculations as approved by City Council in 2018? Were the TIP projects included in the concurrency calculations for the BLUMA? If not, why?

MBAKS thanks the city for the opportunity to comment on DEIS. Written responses to these comments may be sent to:

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