

Greater Maple Valley Unincorporated Area Council
P.O. Box 101
Maple Valley, WA 98038

April 26, 2015

Ty Peterson
Product Line Manager—Commercial
Dept. of Permitting & Environmental Review (DPER)
35030 SE Douglas St., Ste. 210
Snoqualmie, WA 98065

Mr. Peterson,

Please accept the attached Comments and Recommendations of the Applicant's April 17, 2015, responses to DPER's October 3, 2014, "Technical Review" Letter for Commercial Site Development Permit Application CMST14-0001.

We request Staff, during its Second Technical Review Screening on Monday, April 27, 2015, and beyond, give the attached Comments and Recommendations due consideration, especially our deep reservations about critical Traffic Engineering issues.

Should you have any questions regarding the attached, please contact the Chair of our Growth Management Committee, Peter Rimbos, at 425-432-1332 or primbos@comcast.net.

Thank you.

Peter Rimbos
Corresponding Secretary
Greater Maple Valley Unincorporated Area Council (GMVUAC)
primbos@comcast.net

[All of the following is contained in the attachment referred to above.]

Herein please find:

1. King County Department of Permitting and Environmental Review's (DPER's) October 3 "Technical Review" Letter for Commercial Site Development Permit (CSDP) Application CMST14-0001 numbered comments.
2. Applicant's Consultant responses: Traffic Consultant (Jake Engineering)--January 12, 2015; Craft Architects--April 17, 2015; and Decker Consulting Engineers--January 7, 2015.
3. GMVUAC review of each of the Applicant's consultants' responses, along with recommendations to DPER.

Please note we have not provided comments or recommendations on every item listed (by number) in DPER's "Technical Review" Letter.

DPER:

18. Based on the number of lots that access 200th Avenue SE, 200th Avenue SE would be classified as a rural subaccess street. SE 248th Street, which the proposed development will access directly, would be classified as a rural minor access street. Looking at 200th Avenue SE and SE 248th Street as a continuous street (which it is), the classification of 200th Avenue SE/SE 248th Street is borderline between a rural subaccess and a subcollector.

Jake Engineering:

"My analysis in correspondence with the County identified the road as Rural Subaccess Street."

GMVUAC:
The Traffic Consultant appears only to be referring to KCDOT's comments/recommendations for 200th Ave SE. However, KCDOT also stated: "(L)ooking at 200th Avenue SE and SE 248th Street as a continuous street (which it is), the classification of 200th Avenue SE/SE 248th Street is borderline between a rural subaccess and a subcollector."

KCDOT has determined the category of the rural local roads according to guidelines in the *King County Road Design and Construction Standards, 2007*:

Rural Subaccess Streets are “permanent cul-de-sacs or short loop streets that connect to subcollectors. Subaccess streets are not supportive of through traffic. They are typically internal subdivision roadways that provide circulation within the subdivision. Direct driveway connections are allowed.” [Right of Way (ROW) is 48 ft]

Rural Minor Access Street is “a permanent cul-de-sac or short loop street with low traffic volumes that provides circulation and access to off-street parking within a residential development boundary. Like subaccess streets, a minor access street allows direct driveway connections.” [ROW is 40 ft]

KCDOT, based on the number of lots that access it, classifies 200th Ave SE as a “Rural Subaccess Street” (see above). This sounds reasonable. The King County Road Design and Construction Standards state that “Subaccess streets are not supportive of through traffic.” KCDOT further classifies SE 248th Street as a “Rural Minor Access Street” (see above). This also sounds reasonable, given that it is the lowest rural road classification. When taking the two roads as one “continuous street,” KCDOT classifies the combination as “borderline between” a “Rural Subaccess” and “Subcollector.” This also sounds reasonable.

DPER:

19. The traffic generated by the proposed development (279 daily trips, 37 AM peak and 39 PM peak hour) is roughly equivalent to the traffic generated by 30-35 single family homes. The traffic generated by the proposed development, when added to the existing traffic generated by the current land uses will more than likely result in 200th Avenue SE/SE 248th Street reaching subcollector volumes.

Jake Engineering:

“I agree with the logic presented. Subsequent to my ... site traffic is likely to be about 10 to 15% of the traffic generation noted and used in the traffic report conducted.”

GMVUAC:

The Applicant's Traffic Consultant agrees the Applicant's estimated traffic volumes coupled with existing volumes would reach volumes expected on “Rural Subcollector Streets” (which requires a 60-ft ROW--see Comment 24. below for the King County Road and Design Construction Standards). Thus, he agrees that estimated traffic volumes cannot be handled on 200th Ave SE/SE 248 St.

However, he then claims the Applicant's estimated traffic volumes to be overstated by a factor of 7 to 10 !!! He only mentions potential employee trips, but no trips for deliveries, pickups, inspections, etc. Where is the documentation and supporting rationale for such estimated traffic volumes? Where is the new or revised traffic Impact Analyses (TIAs)?

These new unsubstantiated and unrealistic reduced estimated levels of traffic volume directly impact his subsequent responses.

DPER:

20. Per the September 8, 2014 site visit, roadway width measurements of 200th Avenue SE/SE 248th Street were taken every one hundred feet, starting at approximately where the proposed development will be constructed and ending at the intersection of 200th Avenue SE and SE 240th Street. These measurements are attached in a separate document. Pavement width varies from 18 to 29 feet (there is a short 100 foot section that is 38 feet wide just north of SE 242nd Place due to widening that was required of a plat). There are effectively no shoulders; in a few locations there are maybe a 1-foot wide dirt/grass shoulders.

Jake Engineering:

“I also conducted spot roadway width measurements ... The County measurements are consistent with my spot measurements, copy of County data attached.”

GMVUAC:

The Applicant's Traffic Consultant agrees with KCDOT's observations during its September 8 site visit to determine road widths, shoulders, access points, etc. These observations--roads widths are as low as 18 ft and shoulders are nearly nonexistent--identified a major issue in terms of what traffic volumes 200th Ave SE can safely carry and illustrated the impact on the residential neighborhood and the safety of pedestrians, bicyclists, children, and pets.

DPER:

22. Per the site visit, the pavement condition of 200th Avenue SE/SE 248th Street is in fair to good condition from the proposed development location to approximately 100 feet south of SE 242nd Place. From this location to SE 240th Street, the pavement

condition is poor with numerous transverse and longitudinal cracks in the pavement.

Jake Engineering:

"Comment noted."

GMVUAC:

The condition of the road is an important safety and maintenance issue, yet the Traffic Consultant simply "noted" the comment. 200th Ave SE is a KCDOT Tier 4 road and, as such, will receive little, if any, maintenance going forward. With portions already in poor condition, the Applicant must be required to improve the road to meet expected traffic volumes, which are unusually high for this classification of road.

DPER:

23. Other than a short 300 foot section of 200th Avenue SE just south of SE 244th Street and a short section just east and north of the proposed development, 200th Avenue SE is constructed within a 30-foot right-of-way corridor.

Jake Engineering:

"Yes the ROW is on the west side of the road centerline. A number of large underdeveloped parcels of land exist on the east side of the road that has no road ROW provided on the east side of the centerline."

GMVUAC:

We are not aware of such "underdeveloped" parcels on the east side of 200th Ave SE. There is no right of way (ROW) currently dedicated across 2 of the larger parcels on the east side of the road. Without a dedicated ROW, the Applicant would be unable to meet King County Road Design and Construction Standards (see 24. below), unless he acquired ~10 ft of ROW from adjacent property owners. We remain concerned that, for part of the length of 200th Ave SE, there is less than a "30-foot right-of-way corridor" (further discussed in 24. through 26. below).

DPER:

24. King County Road Design and Construction Standards for the following road classifications are as follows:

- a) Rural minor access street - minimum 20-foot traveled way, 2-foot shoulders, 40-foot R/W
- b) Rural subaccess street - minimum 2-foot traveled way, 4-foot shoulders, 48-foot R/W
- c) Rural subcollector - minimum 22-foot traveled way, 6-foot shoulders, 60-foot R/W

25. Per the above standards, almost half of 200th Avenue SE/SE 248th Street does not meet the rural minor access street standard. Only approximately 600 feet meets the rural subaccess standard.

26. Lack of right-of-way makes the construction of 200th Avenue SE/SE 248th Street to a rural subcollector standard impossible.

Jake Engineering:

[For 24] "The above are the County standards."

[For 25. & 26.] "Seventy-five percent of the road corridor has 20 or more feet of road width and generally meets the road width/shoulder width County requirement for a Rural Minor Access Street. Limited ROW along the corridor is the reason the corridor is noted as not meeting criteria."

GMVUAC:

KCDOT provided the standards for each rural road classification in play here. In all cases the KCDOT September 8 site visit (described in 20. above) showed 200th Ave SE does not meet these standards and, thus, improvements would be required. Further, KCDOT states--for the road classification it determined in 18. above (i.e., "Rural Subcollector") for the combined continuous street--the "60-foot ROW" standard cannot be met (KCDOT stated: "impossible")!

DPER:

27. If right-of-way and topography allow, we would recommend that 200th Avenue SE/SE 248th Street be improved to the King County Standard for a rural subaccess road. As a minimum, we would recommend that 200th Avenue SE/SE 248th Street be improved to the King County Standard for a rural minor access road.

Jake Engineering:

"Providing the County road width/shoulder criteria on the corridor within the available ROW should be feasible. Per the County cross-section data the existing road section from about 100' north of SE 245th St. to about 500 feet south has 18 to 19' of paved width. Conducting a road overlay with feathering to achieve 20' of width and providing a couple of feet of gravel on each side of the road would be a reasoned

requirement.”

GMVUAC:

KCDOT's comments in 18. through 26. are reasonable and meet County requirements:

1. In 18. above KCDOT determines the continuous road is “borderline between a Rural Subaccess and a Subcollector.”
2. In 27. above, KCDOT recommends it be “improved” to a “Rural Subaccess” road, even though in 19. above it classifies the expected traffic volumes to be of “Subcollector” levels.

However, in 27. above, KCDOT recommends “as a minimum,” it be “improved” to a “Rural Minor Access” road, the lowest classification, meaning that it cannot handle much traffic volume. If eventually classified as a “rural minor access road,” a 40-ft ROW still would be required at a minimum and the Applicant would need to secure 10+ feet of ROW on each side of 200th Ave SE.

The Applicant's Traffic Consultant mentions “feathering to achieve 20' of width.” That in itself would not increase the usable width of the road, as “feathering” simply pertains to stepping down the pavement depth from full depth to zero at the edge. Such “feathered” portions cannot be used for vehicles, thus it does not provide sufficient road width for throughput volume and safety purposes.

DPER:

28. We also recommend that 200th Avenue SE be overlaid from the intersection of SE 240th Street to approximately 100 feet south of the 200th Avenue SE and SE 242nd Place intersection.

Jake Engineering:

“Maintenance of a County Road is the responsibility of the County.”

GMVUAC:

Yes it is; however, KCDOT's recommended improvements are to correct the existing deficiencies (seen during its September 8 site visit), which are necessary, but not sufficient to overcome specific concerns (raised in 18., 20., 22., 26., and 27. above) regarding the impacts of the proposed Facility.

Wetland Issues

DPER:

The following comments are from Laura Casey, DPER Environmental Scientist who evaluated the pre-application and CSDP application materials, investigated the property, and performed a site visit September 4, 2014:

60. The Department of Permitting and Environmental Review (DPER) performed a partial Critical Areas Designation CADS13-0308 in December 2013 for this property, excluding the southwest corner of the site. A staff geologist reviewed the Critical Areas Designation, but no staff ecologist investigated the site.

Craft Architects:

“Acknowledged.”

GMVUAC:

Has a County Staff Ecologist completed an investigation of the site? If so, what were his/her observations and recommendations?

DPER:

64. In review of the application materials and following a site investigation, the following is the recommended additional wetland evaluation:

- a. It is recommended that the applicant have their wetland consultant re-evaluate the site, and provide data forms to document the presence or absence of wetlands on this property. If wetlands are verified on the site, then the wetland boundary would need to be flagged and the wetland category rated. Staff is available to meet with them on site if necessary.
- b) The buffers from the adjacent streams must also be identified, and shown on the site plan if the buffer and/or building setback falls onto this property.

Craft Architects:

[Refers to two documents: an e-mail exchange with John Altmann and a letter from Mead Gilman & Associates.]

GMVUAC:

Given the extremely compressed schedule, we have not had the opportunity to review either referenced correspondence. However, we believe DPER's concerns are valid and should be made a requirement, as the local environs must be protected under the Critical Areas Ordinance. We hope the referenced correspondence, which we were unable to review, if it proposes to use the old WSDOT drainage pond as the stormwater pond for the proposed project, it should be made clear, plus any alterations necessary, e.g., is it constructed large enough, or is a new pond needed to be located where? Such proposals must be supported by hydrologic engineering analyses.

Geotechnical Issues

65 through 68

GMVUAC:

DPER and Staff provided excellent observations and concerns that necessitate further on-site investigation and Geotechnical Engineering evaluation. DPER and Staff also made some specific requests. Yet, the Craft Architects' letter simply states "Acknowledged" for items 65, 66, 67, and 68a. For items 68c. and 68d. references are made to a letter from William Brown (Landscape Architect) and a report from Giles Consulting--both of which we have not had the opportunity to review in the short time afforded to us.