



Public Works Department - Gregg Zimmerman, P.E., Administrator

June 4, 2018

Ms. Fereshteh Dehkordi
King County Department of Permitting and Environmental Review
35030 SE Douglas Street, Suite 210
Snoqualmie, WA 98065-9266

RE: Proposed Lakeside Maple Valley Asphalt Plant, GRDE 17-0069; PREA 16-0193

Dear Ms. Dehkordi:

Thank you for providing the City of Renton the opportunity to review and comment on the proposed Lakeside Maple Valley Asphalt plant at 18825 SE Renton Maple Valley Road (SR 169) on the south side of SR 169 in unincorporated King County, as shown in the Figure 1 site vicinity map.

The City of Renton has concerns about the impacts additional traffic trips associated with this project will have on SR 169, its intersections to the west of the project and also on 154th Place SE which currently suffers severe congestion during the morning and afternoon peak travel hours.

The proposed asphalt plant is located 1.4 miles east of the Renton city limits, and 2.3 miles east of the intersection of SR 169 and 154th Place SE. The June 19, 2017 Level 1 Traffic Impact Analysis prepared by TENW indicates that a total of 460 new weekday daily trips will be introduced by the project, with 45 trips occurring during the weekday morning peak hours and 32 trips occurring during the weekday afternoon peak hours. With credits for the existing use applied, the project is estimated to generate 295 weekday daily trips. The Analysis states there will be a total of 360 paving truck movements (190 in and 190 out) weekdays between 6:00 a.m. and 6:00 p.m.

An estimated 60% of these trips (114 in and 114 out) will be to and from the west on SR 169. We are concerned that these truck trips will exacerbate the backups and gridlock that already occur at the intersection of 154th Place SE with SR 169 during the peak hours (see attached aerial photo). Currently a significant amount of westbound traffic on SR 169 during the morning peak hours turns north on 154th Place SE and heads up the hill. Frequently motorists in the queue of vehicles waiting to make the right-hand turn get impatient of the delay, and instead turn left onto 152nd Avenue SE in Renton and make U-turns to head up the hill. This creates a dangerous situation that has required us to post "No U-Turn" signs along 152nd Avenue SE, and to provide heavy police enforcement at this intersection. In addition, we receive frequent complaints of traffic congestion and backups and dangerous conditions for motorists trying to enter the street from their driveways from residents living along 154th Place SE. We also receive complaints about traffic congestion and speeding along SE 142nd Street and 144th Avenue SE in Maplewood Heights (unincorporated King County) and 156th Avenue SE and Jericho Avenue NE in Renton.

Renton performed an origin and destination traffic study to determine the impact of cut-through traffic in Renton. Cut-through traffic means traffic using streets in Renton to bypass the heavily congested state routes, I-405 in particular. The study showed that in the morning peak travel period, 68% of the traffic turning right from SR 169 onto 154th Place SE is cut-through traffic with origins and destinations outside of Renton (see attached graphics). In the afternoon peak travel period, 30% of the traffic using 154th Place SE is cut-through traffic.

The TENW Traffic Impact Analysis shows that at the proposed new site access driveway on SR 169, the northbound (exiting site) movement during the afternoon peak hour is anticipated to operate at level of service (LOS) E. The City of Renton's Transportation Element of our Comprehensive Plan (page 28 attached) applies a standard of LOS D to arterials and collectors, which would apply to this portion of SR 169 if it were located within the city limits.

The proposed Lakeside Maple Valley Asphalt Plant would be certain to exacerbate an already bad situation on SR 169, 154th Place SE, 152nd Avenue SE, SE 142nd Street, 144th Avenue SE and 156th Avenue SE both in Renton and in unincorporated King County. The problems of backed up traffic along SR 169 and 154th Place SE, and speeding, congestion, hazardous driveway conditions and illegal U-turns along these and the other streets mentioned, would be worsened by the addition of paving trucks using these arterials and collector streets to bypass backups on I-405. We doubt these impacts could be adequately mitigated, and therefore oppose the siting of an asphalt plant in the proposed location.

With our shared interest in the Cedar River, we urge you to consider the impacts of the proposal on the four wetlands and three streams located on the subject property. Each of the three streams (A, B and C) flow into the Cedar River. Wetland A is the headwater of Stream B, and the right-of-way wetland (located within SR 169) connects to Stream C. Environmentally critical areas disturbed during site remediation should be restored and protected, and adequate buffers should be required of the proposed development in order to prevent adverse effects to the Cedar River.

Thank you for the opportunity to review and comment on this project.

Sincerely,



Gregg Zimmerman, P.E.
Public Works Administrator

cc: Dave Upthegrove, King County Council Member
Reagan Dunn, King County Council Member
Denis Law, Mayor
Renton City Council
Robert Harrison, Chief Administrative Officer
Jim Seitz, Transportation Systems Division Director
Chris Barnes, Transportation Operations Manager
Jennifer Henning, Planning Director



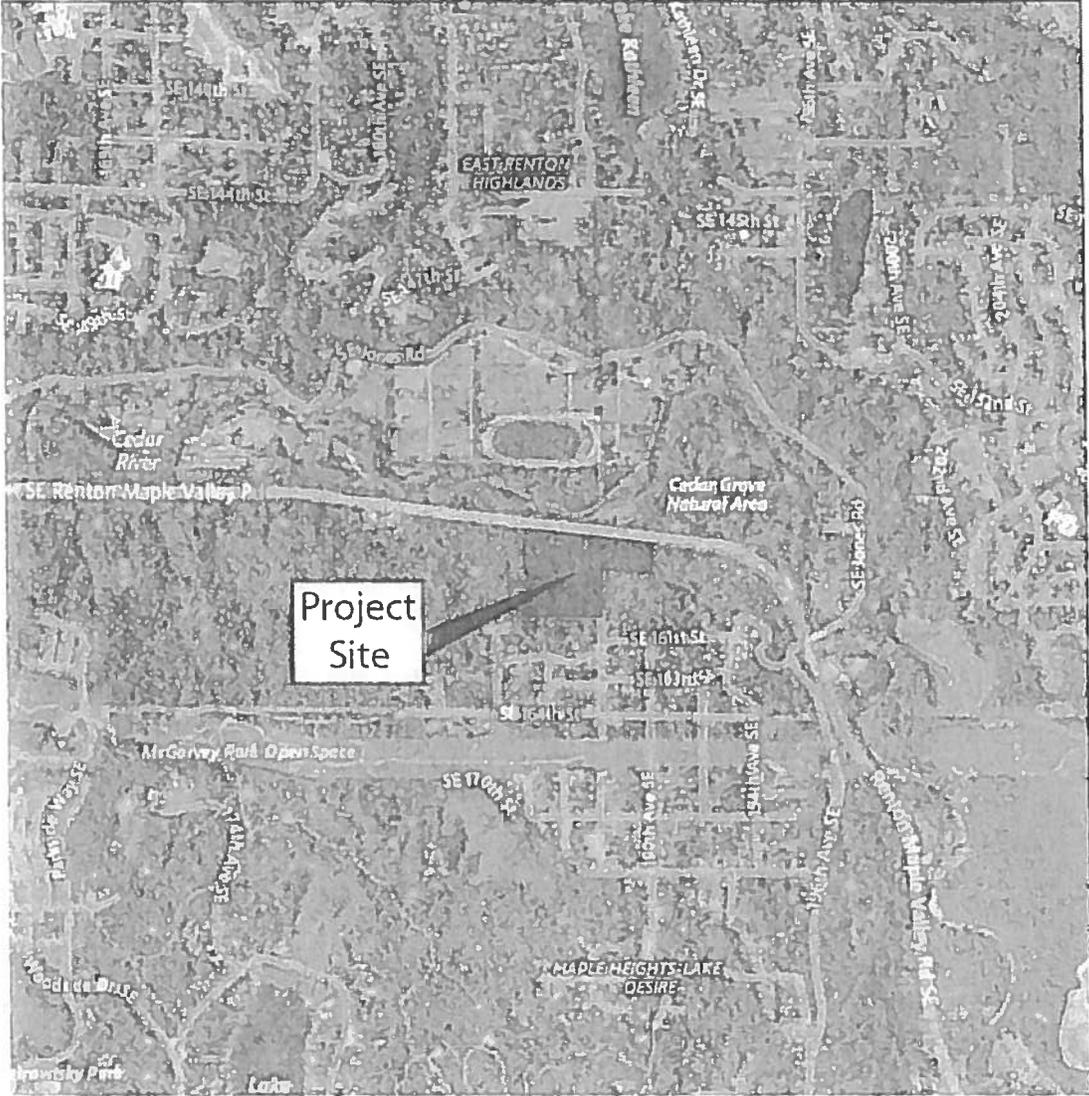


Figure 1: Project Site Vicinity



City of Renton Print map Template



Notes

None



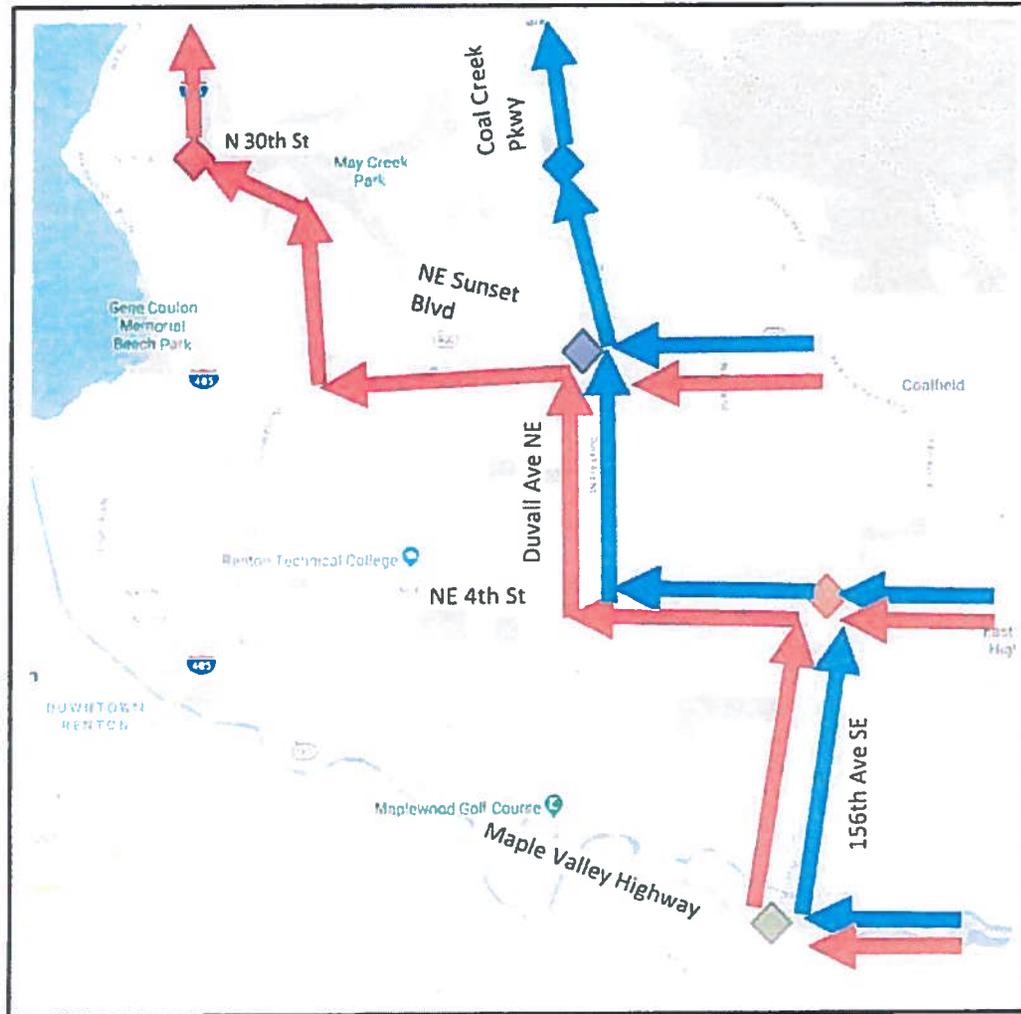
512 0 256 512 Feet

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Legend

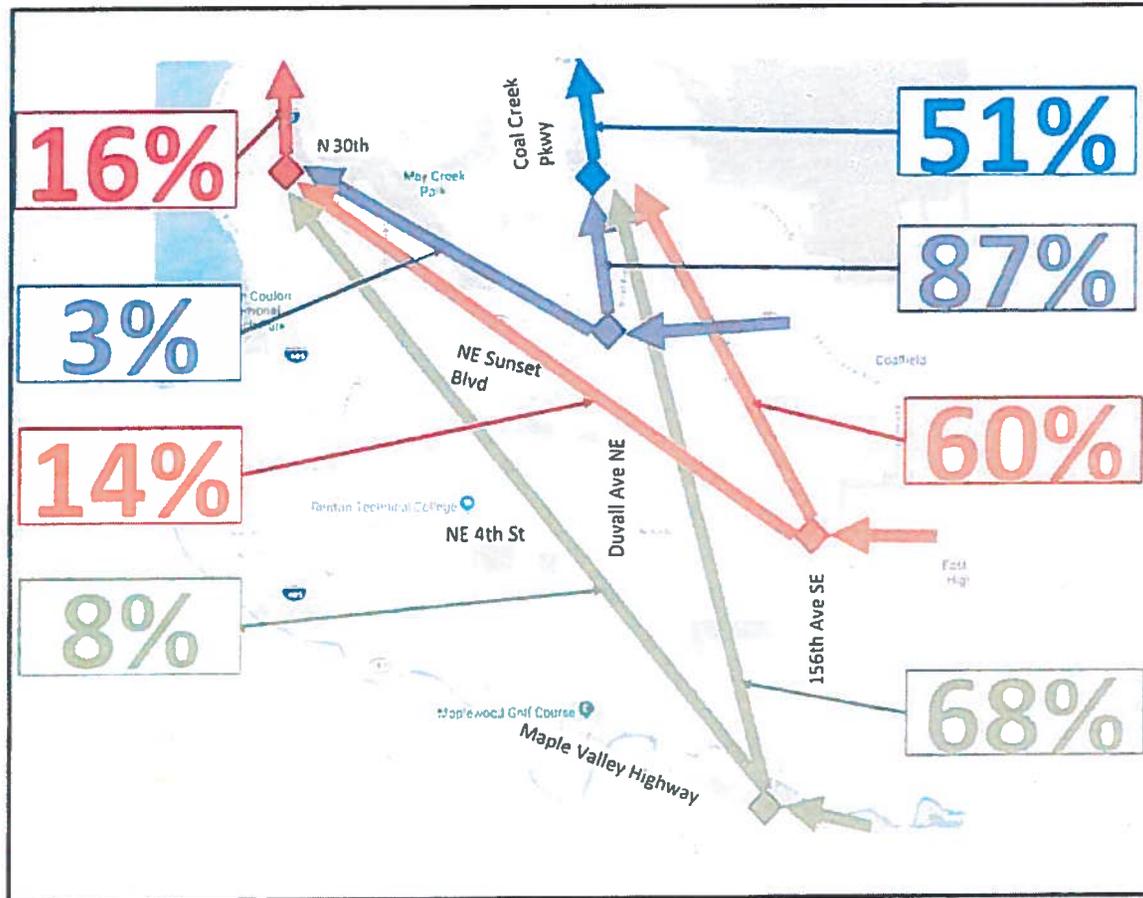
-  City and County Boundary
-  Parcels

Cut Through Traffic Routes



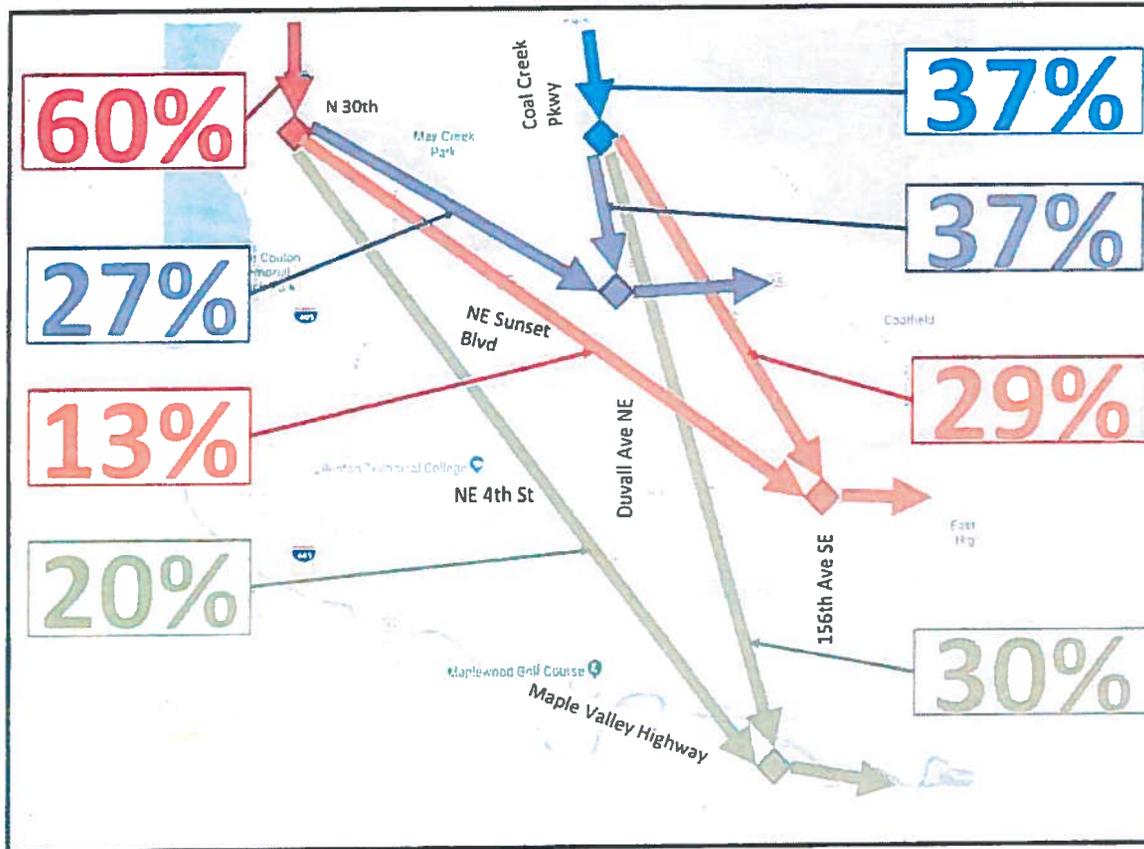
◆ Origin/Destination Node
➔ Simplified Travel Route/
Direction

AM Cut Through Traffic Per Route



◆ Origin/Destination Node
 → Simplified Travel Route/
 Direction

PM Cut Through Traffic Per Route



◆ Origin/Destination Node
 → Simplified Travel Route/Direction



POLICIES

Policy T-44: Ensure adequate transportation facilities are in place at the time of development approval or that an adopted strategy is in place to provide adequate facilities within six years.

Policy T-45: Ensure that new development contributes its fair share of the cost of transportation facilities, programs and services needed to mitigate growth related transportation impacts.

Policy T-46: Maintain a multimodal level of service that maximizes mobility, is coordinated with level of service standards of adjacent jurisdictions, and meets concurrency requirements.

Policy T-47: Incorporate multiple transportation modes in concurrency determinations.

Policy T-48: Apply the following multimodal LOS standards at a citywide level, community planning area level, and development level:

A. Citywide Person Trips: Based on the City's land use and growth strategy, establish a citywide level of person trips by mode, and support each mode with capital improvements and programs. The general mode categories include: motor vehicle trips, transit trips, and non-motorized trips.

B. Community Planning Area Trips: Through the concurrency review process, track person trips by the following areas to monitor if growth is occurring in relation to the Land Use Element and planned Transportation and Capital Facility Plan investments. If growth is occurring in a different pattern than planned, consider the effect on operational LOS and determine if the Comprehensive Plan land use, LOS or capital investments should be amended.

1. West Hill/City Center/Cedar River Community Planning Areas
2. Valley Community Planning Area
3. Talbot/Benson/Fairwood Community Planning Areas
4. Kennydale/Highlands/East Plateau

Community Planning Areas

5. Adopted planned action areas: Track vehicular trips per City-adopted Planned Action ordinances

C. Operational LOS: Through the SEPA review process, apply the following operational LOS standard at intersections that could be impacted by a proposed development:

1. Arterials and Collectors: Except as listed in C.2, apply a standard of LOS D.

2. Alternative Arterial and State Route LOS: Apply a standard of Level of Service E Mitigated for the following:

- **Specific Corridors:** Carr Road, Logan Avenue, Rainier Avenue, Grady Way, SR 900 and SR 515.
- **Centers:** Renton Urban Center and Center Village
- For the above Corridors and Centers, congestion should be mitigated (such as increasing transit or other modes) when p.m. peak hour LOS falls below LOS E.

Policy T-49: Encourage development that can be supported by transit and other non-single occupant vehicle modes.

Policy T-50: Design transportation facilities to fit the neighborhood context. Apply urban design principles.

Policy T-51: Support continued development of the 27th/Strander Corridor into Tukwila.

FREIGHT

Safe and efficient movement and distribution of goods is important for attracting and retaining businesses in the City of Renton.

INVENTORY

Truck and rail freight are important to the regional and local economy. *The Washington State Freight Mobility Plan*, hereby incorporated by reference, identifies T1 freight corridors (those carrying more than 10 million tons per year), T2 freight corridors