



Date: October 24, 2023

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Subject: CDUP23-0002 Wildlife Glamping & RV Park—Traffic Assessment

Ref: 1. [August 6, 2023, GMVUAC Comment Letter](#)
2. April 2022, Transpo Report
3. October 4, 2023, KC DLS-Roads Traffic Engineering Review Comments

The Greater Maple Valley Unincorporated Area Council (GMVUAC) previously provided KC DLS-P detailed Comments on the proposed CDUP23-0002 Wildlife Glamping & RV Park (ref. 1) which included an assessment of the Applicant-provided Transpo Report (ref. 2). Herein we provide our comments on the KC DLS-Roads Traffic Engineering Review (ref. 3).

As is typical of such traffic engineering reviews, the ref. 2 site traffic study was largely taken on face value, without questioning the underlying assumption of low site trip generation, which is what we and the local community dispute. No thought was given to the matter of this site becoming a *defacto* mobile home park with much greater trip generation than was evaluated, as this probably was not even brought to the reviewer's attention as the reviewer normally takes for granted the applicant's site proposal information as to land use. So, the reviewer's focus was on the simple—and much less controversial—matter of updating the traffic study to bring it into compliance with adopted procedures and design standards. We object to this inadequacy and request a greatly expanded analysis of *alternative* land uses that the community has identified. In fact, such treatment is a SEPA issue, and thus, SEPA protocol

should be followed. Consequently, the applicant should address all of the land use, water, and traffic issues for a mobile home park.

KC DLS-P should set sufficient enforceable conditions to prevent the aforementioned concerns from happening, or require the applicant to mitigate it properly. KC DLS-P should defend the King County Comprehensive Plan's land-use plan for the area *proactively*, not *reactively*. In fact, we are now expressing the same point to the KC Council and KC DLS management regarding the Reserve Silica environmental emergency in Ravensdale—not far from the proposed Glamping site.

It also must be kept in mind the applicant has used zoning code terms in previous decades such that he is entitled to only 2 dwelling units on those 40 ac—or some roughly equivalent activity in terms of intensity of impacts such as water consumption and trip generation.

In addition to our August 6 comments, you have received both in writing and verbally many concerns expressed by the local community regarding the proposed CDUP23-0002 Wildlife Glamping & RV Park. With specific regards to the traffic assessments we request the following:

1. Inform the applicant the traffic review just issued will be modified and additional requirements for an expanded traffic study will be forthcoming shortly, as well as other SEPA requirements.
2. Ask the traffic development review engineer to compare the applicant's proposed land use activity to the land use description provided in the Institute of Transportation Engineers' Trip Generation handbook. If that comparison is not acceptably close, then recommend an alternative source of trip generation information. This may for example include a mobile home park for at least part of the site activity.
3. Ask the traffic development review engineer to prepare a supplemental scope of traffic analysis to consider the more intense land-use alternatives the local community has identified. Include in this scope the alternative of using another source for trip generation, and the alternative of subsequent conversion to a mobile home park utilizing the entire acreage of this parcel as the community has described.
4. Ask the traffic development review engineer to account for mitigation of the applicant's entire trip generation in excess of trips generated by just two (2) single-family homes, since that is the only amount of land use this applicant can claim as his "*right*" as a consequence of his previous land use actions since.
5. Ask the traffic development review engineer to account for the "*complete streets*" perspective consistent with the recently passed state law (SB 5452), as follows:
 - a. If allowed, replace the former "*level of service*" approach to traffic-impact analysis with a requirement to measure total traffic conditions before and after the development, accounting for traffic delay, safety, and provisions for all modes of travel, so that the "*after*" conditions are roughly equivalent to the "*before*" conditions.

- b. Consider the area of impact to be Kent Kangley Road from the east city limits of Maple Valley to the Lake Retreat area.
- c. Consider traffic safety and non-motorized conditions in the area, as well as road traffic.
- d. Consider as possible mitigations such improvements as a left-turn pocket at 292nd Ave, a roundabout at Retreat-Kanasket Road, or pedestrian and bicycle safety improvements in the study area, whether near the development site or near Ravensdale Park.

We look forward to your response. Thank you.

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