

From: [Dave Lange](#)
To: [Plancom](#); [City Council](#); [Rachael Markle](#); [John Norris](#)
Subject: Shoreline rezone issues
Date: Sunday, November 27, 2016 3:46:28 PM
Attachments: [CityNovember.docx](#)

Please add to the Public Comments for the 11/28 Council meeting:

My arguments against the current city plans are from a business development background and as a transit geek. I care about affordable housing and the high taxes in Shoreline that are headed higher as we try to fit square stations into round rezones. I care about walkability and the carbon balances of growth and congestion. The transit station rezones makes me grind my teeth because we continue to put density at the station without looking at the flipside of many consequences.

Show me the study where Shoreline planned for its next business center or studied the costs and benefits of an increment of growth at the station versus an increment of growth at an existing business center. The city failed to understand that while TOD has transit in the label it is really about business. We are back to a city that has been at a disadvantage for business development and is trying to grow beyond the bedroom community label but will cause congestion in the wrong place. We were attracted by something new and shiny that reinforced the sense of bedroom community and didn't stay with the better goals to intelligently grow our community around urban villages and take advantage of buses to get to transit options. It was telling at the 11/21 council meeting that we zoned an area for TOD/MUR without even provisioning a bus route. If we put density around our existing business centers the buses are already running there with reserved space in the station. I can promise higher bus ridership and more walkable streets if the rezones aren't at the stations. What is the purpose of creating congestion at the station and not gathering back in existing business centers? Why is my mind saying it takes two generations of new buildings to get the lollipop vision everyone else sees and that we will suffer through a generation of blight in our lifetimes? We use traffic studies to fix our residential zoning instead of using a master street grid to develop our business zoning. Not only are the development codes allowing for only residential and dumb density, the city allows side parking lots in MUR 45 which hurts walkability. It forces development up to the sidewalk which improves walkability, but it doesn't allow a storefront to get restocked. Sound Transit and WaDOT are providing a station with the rails at the back of the facility instead of being convenient for pedestrians at the street. We are partnering with WaDOT, make them put the station over 145th and direct the buses to use stops on 5th and 145th. The garage can go to 15th and drivers will get a fast bus ride to the station. Do we really count it as a win that the planned station is half way between 5th and the other side of the freeway and that half of every trip time from Kenmore will be spent between 15th and the station? Will you frequent these quaint coffee shops that have nowhere to park? Do you think a business owner might do a similar analysis?

We went through a carbon analysis during the last Council meeting. During Peak hour the

commuter will save a couple of tons of carbon being able to walk up to a half mile to the station. For the commuting hour our super commuters just walked for 20 minutes (and maybe stopped for tea) to ride for 20 minutes to downtown and have up to 20 minutes to walk from the tunnel to their office and get a cup of tea. This is the story the city wants you to see.

What about the 20 thousand peak hour trips from the station area, about 5,000 that would be light rail, 15,000 would not be light rail and very small portions would have a destination inside the rezone. The more than 65 thousand average daily trips from the 145th rezone will have a higher percentage of non transit trips. We just passed ST3 which means we have commuters coming from Northshore to our station. Our original rezone plans knew nothing of ST3 and the use of buses getting to the stations. I ask why we are staying on the original course when we have voted for a better solution. It is going to take 20 minutes to get from 15th to the station by bus, even with queue jumps and prioritized signals. We can hope with the Corridor improvements you could walk as fast as the bus. The pedestrians are going to be milling around the station entrance in a sense of community that the Planning Commission demands. UW Seattle just moved most of its buses from going through campus to going around campus, it hurts immediate pedestrian interactions but it improves reliability and liability of buses. Our super commuters save 1 trip of carbon by walking to the station, they are going to burn an average of 5 other trips of carbon living the rest of their day without a business center and without smart density. We just went from a couple of tons saved to just over a hundred tons of unnecessary carbon wasted due to poor city goals. The Council meeting on 11/21 ignored buses in favor of unmotorized not realizing what the upzone is doing to the area around the station in terms of extra lanes which are anti walkable and delays for buses which isn't transit friendly. Our contact on the ST Board should really weigh in on supporting the second pedestrian bridge for the station with station based rezones or supporting ST3 and the Northshore Tricities with urban villages based rezones away from the stations.

Look at the 2017 Shoreline budget and the line items for studying the second pedestrian bridge and the eventual cost of construction as well as the costs of moving the SPU pump house, the buttonhook on ramp, the up and over pedestrian ramp, the widening of 5th Ave to 6 lanes and the costs of taking homes on 5th Ave.

Attached is a document of supplemental details,

Dave Lange

Shoreline

The Shoreline rezone EISs used a traffic model for a fully developed or mixed community. In communications with the Shoreline Traffic team the traffic analysis work that Fehr & Peers did to support the 185th efforts was sufficient for the subarea plans as ruled by the Growth Management Hearings Board no other localizations were done by the EIS process. The answers for the studies were the total trips in and out of the rezone for residents and errand runners. I would like to present a case that the model assumptions do not fit where Shoreline is headed. Let's state the obvious that TOD is a good technique to reduce expected traffic with a given density. A second statement is TOD is used by communities to move existing or expected congestion to a new area. What is a higher priority than lessening congestion at the stations?

Traffic numbers in both upzone EIS's came from a mixed use reduction to traditional Peak PM hour trip numbers calculated using the MXD technique. It calculates the trips generated, not the distance travelled. Most adults have practiced trip reductions. It doesn't make any sense to come back home after each leg of your errands. The problem with the residential upzones is there are very few non-commuting destinations to chain together in the upzone. A lot of my concerns are caused by the pace of activity, if we had 3-5 MUR45 (not townhomes, but 1 commercial under 3-5 residential floors) being constructed, I wouldn't be saying so adamantly that we have a problem. I'll make the observation that given 4 rezones promoting MUR there are no MUR buildings in Shoreline with significant businesses.

In the past I have pointed out that density doesn't actually do anything to reduce car trips it only offers the opportunity to reduce car trips. Traffic is the answer to the question of what someone in Shoreline will walk to, maybe bike or transit to and realistically drive their car to given a lack of convenience or too much distance. Said a different way Smart Density, Urban Village and Mixed Community are all about the multimodal access, Dumb Density and what Shoreline is planning are about the car trips necessary to reach the living destinations.

<http://www.citylab.com/housing/2013/06/transit-might-not-be-essential-transit-oriented-development/5851/>

Page 1) Density, a mixture of residences and services, walkability, and the general built environment all play key roles. What if some of these other factors proved as important as rail proximity when it came to TOD's sustainable impact?

Page 1) Chatman found that proximity to rail was *not* the essential TOD element it's typically thought to be — and, in fact, that it's importance vanished in the face of other factors

But in the face of housing type and parking and built environment, the significance of rail once again slipped away. Off-street parking, job density, bus stop prevalence, and distance to Manhattan (a New Jersey article) were stronger links to car commuting. Similarly, supermarkets within a quarter mile of one's home reduced car trips to the store, and scarce neighborhood parking cut them by a quarter.

In Summary the urban village concept depends on more than transit to make a walkable community and reducing parking isn't enough to reduce cars.

Shoreline Zoning allows residential only density at every level and allowable footprints too small for serious business. The rezone business studies mentioned the difficulty Shoreline faced attracting business off of Aurora. There is an article on Vancouver, BC and their implementation showing potential apartment dwellers looked for transit first and a very close second was markets and shopping.

<http://www.metrovancouver.org/services/regional-planning/PlanningPublications/AptParkingStudySummaryBooklet.pdf>

I don't like betting on market forces to layout a functioning urban village where the mixed community model would apply. In terms of time, creating 4 new business centers (East and West 145th, Town Center and Shoreline Center) in Shoreline at the same time means changes will take more time to finish and the raising the chances for more car volume with less bus riding and less walking during the change. Actual urban villages and mixed community could be delayed until the rezone areas finish a second replacement of the buildings in the rezone.

I found a couple of TOD examples to show the mixed designation for the R6 rezones wasn't appropriate for the eventual zoning. In Table A I have included matching numbers from 3 other TOD sites around the US. My estimates for Shoreline Office and Retail used a per unit value for the square feet of office and retail from the other sites multiplied by the units expected in Shoreline. The Georgia site was an old industrial park completely scalped and needing all the infrastructure. The Oregon site was an add-on to downtown Portland and only required an incremental addition to infrastructure. Shoreline is an outlier and therefore the traffic numbers and distributions are a poor fit for at least the next 20 years.

Location	Units	Office (sq ft)	Retail (sq ft)
Atlantic Station, GA	798	550,600	434,500
Baystreet Station, NJ	381	N/A	382,000
RiverPlace, OR	700	40,000	26,500
185 th Shoreline (est)	23,000	1.3 to 15 Million	0.8 to 12 Million
145 th Shoreline (est)	13,486	0.8 to 9.3 Million	0.5 to 7.3 Million

With the average household making an average of 4-6 trips a day, the use of Peak PM hour doesn't tell the whole story. The Institute of Traffic Engineers (ITE), started with 6 categories to create a mixed use traffic number. (Residential, Business, Offices, Theater, Transit [light rail and buses] and hotels) from http://nacto.org/docs/usdg/trip_generation_ite.pdf. An ITE definition of a MXD is:

[Nacto] "A mixed-use development or district consists of two or more land uses between which trips can be made using local streets, without having to use major streets. The uses may include residential, retail, office, and/or entertainment. There may be walk trips between the uses."

I'm concerned if we ignore offices, we have now reduced a six attribute equation to a 3 attribute equation that may or may not capture as much of the predicted benefit of TOD.

The locations of the rezones indicate business was a secondary concern in the rezones. The specified zoning/code with residential only in each category and unrealistic business parking under the buildings and no street parking expected in the rezones also hurt any business formation. Since the traffic study used a mixed community number for the traffic study in the EIS and the first results will not be mixed, the traffic study has underestimated what Shoreline can expect in the future and that no meaningful traffic study have been done with either EIS.

A basic TOD assumption says there are an average of 5 daily trips per unit and if each unit commuted daily using transit we would show 20% of the trips as commuting by transit. The Shoreline EIS predicts transit captures 50% of the commuting trips to get the 10% transit number. Looking in the 185th final EIS we see approximately 23,000 units while the 145th final EIS shows 13,486. If we are only getting 10% transit trips out of the rezones, we don't need to put them at the stations. Actually the 90% of other trips will likely interrupt the bus transit using the stations. Its bad enough considering that every transit trip I take, I have to walk through 9 pollution spewing cars with the increased density. If Shoreline goes ahead with its rezones, it needs to seriously consider what it is going to do to reduce the future car trips (density is the problem not an answer). It is not just a matter of reducing car trips it is making car trips local to the area someone lives and not going to the far end of town. The council is talking about the pedestrian bridge at 145th for commuting to the station and ignoring the other 90% of the trips, businesses won't be operating for a long time and car trips to 145th or up to 155th are the only choices for the zoning west of I5.

Table B: Trips per Unit		
Location	185 Rezone	145 Rezone
Units	23,000	13,486
5 trips per day per unit	115,000 ADT	67,430 ADT
10% Transit trips per day	11,500	6,743
Other trips per day	103,500	60,687

The “Other trips per day” would be the internal and external trips from the EIS. Given the Development Code passed by the Planning Commission there isn’t a lot of stores and services to walk and bike to. Most of these trips will use the nearby arterials for part of their travel and if the Aurora Corridor is 40,000 ADT, these numbers will be large. Just being close to the station is no reason to give a parking reduction, having a certain square footage of business in a quarter mile is a better requirement. Without separate bus lanes we can’t talk about forcing people into buses with congestion.

Metro is planning 4 routes in addition to the 522/Northshore ST3 buses. Given their importance similar to the 522/Northshore route means we should expect similar frequencies. The result is an expected 48 buses an hour serving the 145th station. I have experience with the South Lake Union Trolley and walking faster than I could ride. Shoreline thinks in terms of Pedshed radius; however, buses calculate the length of the run. Having buses wait for traffic lights for longer than 15 minutes significantly shortens their effective routes.

General reading shows that available transit and walkable commercial access can reduce the expected number of car trips by between 15 and 20 percent. New density will still add 80-85 percent of the expected trips of being in the middle of nowhere. Auto use per household averages 7.1 trips per day in suburban areas and 5.3 trips per day in TOD. Cynically the difference is basically explained by a commuting trip. Bring this back to Shoreline and our discussions of saving our roads with density and bringing transit close isn't the whole picture. Having residents get rid of cars due to transit and therefore allowing parking space reductions for multiunit near transit is also the wrong conclusion without walkable commercial trips. The additional density at North City has done little to incorporate small business into the structures.

Commuters will put up with an hour long commute. Let us call it 20 minutes for light rail to downtown. Let us give the commuter 20 minutes to walk or catch an additional bus. Shoreline is delaying buses for 15 minutes between 15 and 5th, not counting station time and the signal at 148th (are the bumpout bulbs long enough for the 2-3 traffic cycles we expect at 15th and the additional 1-2 cycles at 5th?). That means everything east of 15th is no longer in the commuter window. If you adopt my TOD estimates the rezones will actually be worse than the general study which means the ST3 plan is dead before it starts for the Northshore.