



Gibson Traffic Consultants, Inc.

Transportation Planners and Traffic Engineers

COMMENT RESPONSE MEMORANDUM

To: Sherrie Ringstad, Associate Planner – City of Mill Creek
From: Matthew Palmer, PE *MJP*
Subject: 7C's Swim School
Date: February 10, 2020
Project: GTC #18-262

This comment response memorandum is to provide responses to the comments provided by Rory Cameron of Perteet on October 8, 2019. The comments addressed by GTC are comment 1, 2, 5, 6, and 7.

Comment #1: The trip generation is not based on the ITE Trip Generation Manual, but rather data provided by the applicant. While a private pool is not specifically addressed in the ITE Trip Generation Manual, private or semi-private health and athletic clubs are. Please compare the Applicant's trip generation data to similar land uses (such as 492, 493, or 495) to support the use of the applicant's data. Preliminarily, this may not change the volume generated, but it may change the distribution.

We looked at these other uses; our data and splits used in the TIA are consistent with the other uses and per our discussion with Rory Cameron at Perteet no additional analysis would be required.

Comment #2: The synchro analysis' peak hour factor and heavy vehicle factor do not match the traffic volume worksheets.

The current methodology for the peak hour factor and heavy vehicle factor under the 6th Edition of the HCM is for the total intersection peak hour factor and heavy vehicle factor to be utilized. Both the peak hour factors and heavy vehicle factors for the study intersections match the total intersection values from the traffic volume worksheets.

Comment #5: The City does have an interlocal agreement with Snohomish County as of February of 2019. Please review if applicable to the development.

Development's within the City of Mill Creek are required to mitigate their impacts to Snohomish County roadways based on a proportionate share or Snohomish County improvement projects impacted by 3 or more directional PM peak-hour trips. The 7C's Swimming School development is not expected to impact any Snohomish County improvement projects identified in the TNR Appendix D with 3 or more directional PM peak-hour trips and therefore should not be required to pay traffic mitigation fees to Snohomish County.

Comment #6: No parking study has been provided for review.

No parking study is required per direction from our Client.

Comment #7: Site plan does not match current Civil plan layout.

The updated plan is included in the attachments.

Attachments

A-1 to A-11

TECHNICAL MEMORANDUM

2707 Colby Avenue, Suite 900, Everett, WA 98201 | P 425.252.7700

To: Sherrie Ringstad, Associate Planner, City of Mill Creek

From: Rory Cameron, PE, Perteet

Date: October 8, 2019

Re: Traffic Impact Analysis Review Comments for the 7C's Swim School Traffic Impact Analysis

Perteet Inc. has been retained by the City of Mill Creek to review the Traffic Impact Analysis prepared by Gibson Traffic Associates, Inc. This memorandum provides a review of the impact analysis based on trip generation and delay/ level of service analysis.

The analysis reviews trips generated by the development. A summary of the traffic impact analysis' comments are found below:

1. The trip generation is not based on the ITE Trip Generation Manual, but rather data provided by the applicant. While a private pool is not specifically addressed in the ITE Trip Generation Manual, private or semi-private health and athletic clubs are. Please compare the Applicants trip generation data to similar land uses (such as 492, 493 or 495) to support the use of the applicant's data. Preliminarily, this may not change the volume generated, but it may change the distribution.
2. The synchro analysis' peak hour factor and heavy vehicle factor do not match the traffic volume worksheets.
3. We have no comment for the collision analysis.
4. Civil plans and site distance review shall be coordinated to show clearing and obstruction removal.
5. The City does have an interlocal agreement with Snohomish County as of February of 2019. Please review if applicable to this development.
6. No parking study has been provided for review.
7. Site plan does not match current Civil plan layout.

Civil plan review:

1. The Civil plan show a cement concrete driveway for the development. The existing access across the street has a curb return style driveway. Both approaches have similar volumes. Please review which driveway type should match the existing or differ.

Traffic Mitigation Offer to Snohomish County

The applicant completes part one and submits it to the city with a completed county traffic worksheet. The city completes part two and sends it to the county. The county completes part three and sends it back to the city.

Part One to be completed by Applicant

Basic Development Information

Name of City in which development is located Mill Creek

Name of Proposed Development 7C's Swimming School

City Project File Number (if known)

Name of Applicant

Address of Applicant

Proportionate Share Calculation: Choose Option A or B

☐ Option A: Based on a percentage of the County's adopted impact fee (Attach traffic worksheet.)

1. The applicable percentage of the County's fee: _____ %

2. Net New Average Daily Traffic: _____ ADT

3. The adopted County impact fee for this development: _____ \$/ADT

4. Total Proportionate Share Amount: \$ _____

☒ Option B: Based on a comprehensive traffic study (Attach traffic worksheet and traffic study)

 X No road improvements are impacted. Hence, proportionate share amount is zero.

 The following road improvements are impacted. The calculation of proportionate shares is summarized below.

List by Names/Description the Impacted County Projects (attach other pages if necessary)	County Project ID#	PHTs Impacting Project	Capacity Cost per PHT	Proportionate Share Obligation per Impacted Project
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1.

2.

3.

4. Total Proportionate Share Amount (sum of obligations for each impacted project) \$ _____

☒ Trip Distribution and Assignment if Required

If required, attach AM and PM peak-hour trip distribution and assignment. (Attach traffic worksheet showing whether or not it is required and traffic study).

☒ Mitigation of Other Impacts if Required for Developments Generating More than 50 Peak-Hour Trips

Mitigation of Impacts on Level of Service

 X No impact or not applicable Mitigation as described in attached traffic study.

Mitigation of Impacts on Inadequate Road Conditions

 X No impact or not applicable Mitigation as described in attached traffic study.

Mitigation for Impacts on Access or Circulation

 X No impact or not applicable Mitigation as described in attached traffic study.

☒ Written Offer

The Applicant hereby voluntarily agrees to pay the total proportionate share amount shown above for impacts of the proposed development on the capacity of Snohomish County roads and provide mitigation of all other impacts as indicated above and described in attached documents.

BY:  Date 2/10/2020

Signature by Authorized Official of Applicant or Authorized Representative

Print Name and Title Daniel Carr - President 7C's Swim School Inc & Owner: Carr Holdings LLC

Instructions to Applicant: Submit this offer, a completed county traffic worksheet, and any other attachments to the city with your initial application or send directly to Deb Werdal, Snohomish Co. DPW Traffic, 3000 Rockefeller M/S 607, Everett WA 98201.

Part Two: To be completed by the City

Receipt of Written Offer and Attachments by City and Routing to County

Name of Proposed Development 7C's Swim School
City Project File Number PL2019-0014
Date Received 9-19-19
City Staffer Assigned to Project Sherrie Ringstad
Address 15728 Main Street, Mill Creek 98012
Phone 425-921-5717

Instructions to City. Send this offer and all attachments to Deb Werdal, Snohomish Co. DPW Traffic Operations, 3000 Rockefeller M/S 607, Everett WA 98201. Send copy to staffer shown above.

BY:

[Signature] Date 2-20-20 Sherrie Ringstad, Assoc. Planner
Initialed by City Staffer Print Name and Title

Part Three: To be completed by Snohomish County

Receipt of Offer and Attachments by Snohomish County and Routing Back to City

Name of Proposed Development

City Project File Number

Received by:

Date

Initialed by County Staffer

Print Name and Title

Snohomish County Mitigation Request to City

Snohomish County has reviewed the traffic study worksheet and mitigation offer submitted by the applicant and has determined as follows:

☐ Snohomish County requests that the City impose the mitigation offered above as a condition of approval for the Development. Snohomish County agrees to accept changes in the mitigation payment amount shown above resulting from TDM or lot-yield adjustments approved by the City.

☐ Snohomish County requests that the City require additional supplemental information to adequately evaluate the proposed development's impacts. ☐ The information requested is shown in the notes below.

BY:

Date

Signature by Authorized County Staffer

Print Name and Title

Routing Back to City

Instructions to County Send this offer and all attachments to the City Staffer shown in Part Two above.

Sent by:

Date

Initialed by City Staffer

Print Name and Title

Notes

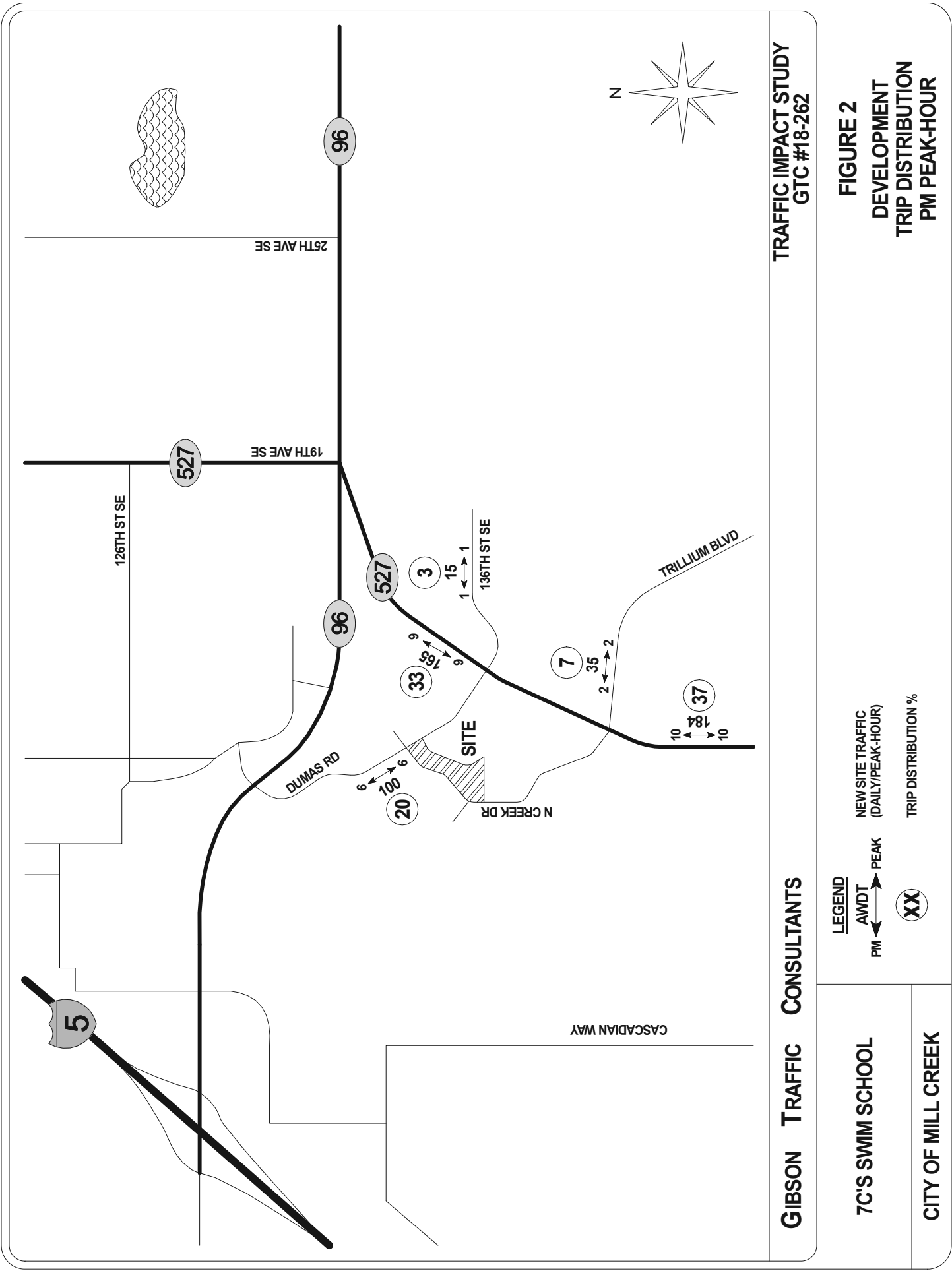


Exhibit 2

Snohomish County Traffic Worksheet and Traffic Study Requirements for City Developments Impacting County Roads

Snohomish County (the “County”), through an interlocal agreement (ILA) with the City of Mill Creek (the “City”), may request traffic mitigation measures from any new development in the City (“City Development”) that impacts County roads. The City will impose the requested mitigation measures to the extent the City determines that the mitigation is reasonably related to the impacts of the City Development.

To determine impacts and reasonable mitigation measures, the County requires a traffic study from any City Development subject to the ILA. This ‘traffic study’ may be as simple as completing Sections One and Two of the County traffic worksheet below, or having a professional traffic engineer conduct a formal traffic study to assess site specific issues consistent with the requirements in Section Three below. A City Development must pay traffic mitigation fees to the County based on either the “Area Averages” methodology or by determining the impacts to specific County cost fee basis projects using average daily trip (ADT) generation and distribution. (See Section IV H in the ILA).

- A. Mitigation Payment Option A. If a City Development generates less than fifty (50) peak-hour trips and the applicant chooses to utilize the “Proportionate Share Determined by Percentage of County Impact Fee” for determining the mitigation payment, then the applicant will generally only have to fill out the first two sections of this traffic worksheet and complete a mitigation offer (see Section Two below).
- B. Mitigation Payment Option B. If a City Development generates more than 50 PM peak - hour trips, or if the applicant chooses to utilize the “Proportionate Share Impact Mitigation Based On Comprehensive Impact Analysis” for determining the mitigation payment, then the applicant will have to fill out Section One of this worksheet, complete a separate traffic study consistent with the requirements in Section Three, and complete a mitigation offer (see Section Three below).
- C. Submittal of Documents. Applicants should submit all documents to the City.
- D. Supplemental Information. Following review of the documents submitted, the County may request supplemental information and analysis as necessary to determine the impacts of the City Development in accordance with the City/County ILA and the County’s mitigation policies. The City will require the supplemental information to the extent the County determines it is necessary to determine the impacts of the development.
- E. Impacts on Access or Circulation. The County may request improvements to existing County roads to provide safe and efficient access and/or circulation. In some instances, the County might request provisions for future County roads identified in the Comprehensive Plan.
- F. Frontage Improvements, Right of Way, and Access Point Requirements. Any City Development which takes access from a County road or fronts on a County right-of-way must provide appropriate analysis and documentation to enable the City and the County to determine what standards and requirements to apply.
- G. Traffic mitigation offer. The applicant shall complete a traffic mitigation offer to the County that summarizes the mitigation identified in the County traffic worksheet and any additional traffic impacts. See Section Four below.

Section One (1) Worksheet General Information

1. Name of Proposed City Development Mill Creek

2. City Development File Number (if known) _____

3. APPLICANT TRAFFIC CONSULTANT

7 C's Swim School	NAME	Gibson Traffic Consultants, Inc.
21600 31st DR SE	ADDRESS	2813 Rockefeller Avenue, Suite B
Bothell, WA 98021	CITY/ST/ZIP	Everett, WA 98201
206-595-9928	PHONE #	425-339-8266
daniel@7cswimschool.com	EMAIL	info@gibsontraffic.com

4. City Development Site Address _____

5. Does the City Development front on County road(s)? If yes list road(s) No.

6. Description of City Development (size and specific type) 10,000 SF swimming school facility

7. ADT expected to be generated by the proposed development

0.00 AM Peak Hour 55.45 PM Peak Hour 499.07 Average Daily Trips (ADT)
(Trip generation for complex developments may have to be determined per Section Three (3) below)

8. Proportionate Share Impact Mitigation: For determining the amount based on a:

 County/City determined percentage go to Section 2(a).

X Comprehensive traffic study go to Section Three (3).

Section Two (2) Proportionate Share Determined by Percentage of County Impact Fee

2(a). Calculation of Payment Amount

1. Average percentage of trips impacting County roads is:

 % for TSA D % for TSA E %
for TSA F

(Enter the Percentage (%) from the City Development Traffic Percentage Influence Area Map)

2. County Impact Fee Rate Per ADT*: TSA D \$ TSA E \$ TSA F \$

(* Consistent with the ILA, City Developments pay the County rate for the TSA's being impacted that are in effect at the time the City Development application is deemed complete by the City. The County Council can change these rates at any time by Ordinance, so consult with the County to find the latest fee rates.)

4. Calculation of Proportionate Share Impact Mitigation. The overall percentage impact is 70%, with the breakdown by TSA calculated by the following:

 X X = \$
% of trips PM PHT TSA D Rate
(#1 above) (#2 above) (#3 above) TSA D payment

<u> </u>	X	<u> </u>	X	<u> </u>	=	\$ <u> </u>
% of trips (#1 above)		PM PHT (#2 above)		TSA E Rate (#3 above)		TSA E payment
<u> </u>	X	<u> </u>	X	<u> </u>	=	\$ <u> </u>
% of trips (#1 above)		PM PHT (#2 above)		TSA F Rate (#3 above)		TSA F payment

Total Proportionate Share Mitigation Payment Due: \$

2(b). Determining If An Additional Traffic Study Is Required

Will the City Development generate more than fifty (50) peak-hour trips *or* are there other impacts that need to be addressed, e.g., level of service, safety, or access and circulation?

 No. Skip Section Three and go to Section Four.

 Yes. Read the introduction to Section Three and skip to Section 3(b).

Section Three (3) Traffic Study Requirements

Introduction: This Section outlines requirements for traffic studies for impacts on County roads. If an applicant chooses (or is required) to complete a traffic study, then it should be submitted along with this worksheet and a mitigation offer. For City Developments generating more than 50 PM peak hour trips see Section 3(c) below.

(Note on Author's Qualifications: A traffic study under this Section must be conducted by an engineer licensed to practice in the state of Washington with special training and experience in traffic engineering and, preferably, membership in the Institute of Transportation Engineers (ITE). Individuals or firms not on the County's approved list shall, with the traffic study, provide the County the credentials of the individual or firm performing the traffic study certifying compliance with these qualifications.)

3(a). Proportionate Share Impact Mitigation Based On Comprehensive Traffic Study

1. Development's Trip Generation and Distribution. Determine the PM peak-hour trip generation and distribution for the development consistent with Section 3(b) below.
2. Impacted Improvements. Determine which of the road sections with planned improvements in the County's impact fee cost basis (Transportation Needs Report Appendix D) are impacted by three or more development-generated Directional Peak Hour Trips in the developments PM peak hour (PM PHT).
3. Current Counts. For each impacted improvement, provide current traffic counts to determine the PM PHT.
4. Reserve Capacity. Determine "reserve capacity" for each impacted improvement by subtracting the current PM PHT from the maximum service volume (MSV) for the existing facility. Reserve capacity is set to zero if current PM PHT exceeds the MSV. For MSVs see County DPW Rule 4224.
5. New Capacity. New capacity is the incremental increase in PHT that could be accommodated with the planned improvement. Determine the new capacity of each impacted improvement by subtracting the current MSV from the future MSV after the improvement.

6. Chargeable Capacity. For each impacted improvement, add the reserve capacity to the new capacity.
7. Final Adjusted Cost. Find the cost of each impacted improvement and make any adjustments used by the County for tax credits (see Transportation Needs Report Appendix D).
8. Capacity Cost per Peak-Hour Trip. For each impacted improvement, determine the capacity cost per PM PHT by dividing the final adjusted improvement cost by the chargeable capacity.
9. Traffic Impacts. From step one above, take the *total* number of PM PHT (in both directions) impacting each planned improvement.
10. Proportionate Share. For each impacted improvement, determine the proportionate share impact mitigation by multiplying the capacity cost per peak-hour trip by the number of PM PHT impacting the improvement.

3(b) Trip Generation and AM and PM Peak Hour Trip Distribution and Assignment

Calculate the City Developments AM, PM and Daily trip generation consistent with the ITE Trip Generation Handbook and Snohomish County Public Works Rule 4220.070. Determine the trip distribution and assignments consistent with the County's document titled "Format for Trip Distributions" available at the County web site identified in the section below titled "Additional Information".

1. The City Developments distributions will be carried out to each key County intersection at which the approach or departure volumes on any leg have three (3) or less peak hour trips. Trips should be distributed onto the County road system as it is expected to be in six years. You may obtain the most current list of key intersections on the County web site identified in Section 5(a) below.
2. The distribution should be a schematic map showing the broad distributions of trips in terms of percentages on different roads. Show all City boundaries.
3. The assignment should be a schematic map with the impacted key intersections identified by ID# and turning movements for each shown in separate diagrams on the same page or on different pages. The assignment should also be presented in tabular form listing each intersection by the intersection ID#, and the number of trips at each movement.

3(c). Additional Analysis for City Developments Generating More Than Fifty (50) Peak Hour Trips

For City Developments generating more than 50 peak-hour trips the County requires a future level of service forecast to analyze the City Developments impacts on the level of service of County roads. Contact a PDS Traffic Development Reviewer for the most current list of arterial units in arrears and critical arterial units. Identify any arterial units in arrears or critical arterial units impacted by three or more directional peak-hour trips.

3(d) Additional Analysis for Documented Safety Locations and Access or Circulation

The County may also request any City Development provide additional analysis on either documented safety locations or impacts on access or circulation. If so, the County will request specific additional information through the City.

1. Documented safety locations are defined by the County as either an "Inadequate Road Conditions (IRC)" or "Deficient Road Condition (DRC)" or as amended. Unlike LOS impacts

any three peak hour trips added to documented safety locations are considered an impact for which disclosure is necessary (e.g., 2 westbound plus 1 eastbound).

2. Access or circulation. The County may request improvements to existing County roads to provide safe and efficient access and/or circulation. In some instances, the County may request provisions for future County roads identified in the Comprehensive Plan or in Small Area Transportation Studies.

If any off-site improvements are needed for mitigation the County will work with the applicant to determine requirements for right-of-way, construction plans, right-of-way use permits, construction/maintenance bonds, and other issues.

Section Four (4) Traffic Mitigation Offer to the County

The applicant should complete a traffic mitigation offer to the County that summarizes the mitigation identified in the County traffic worksheet and any additional traffic study analysis. This will facilitate timely review of the development and processing the application. The form to use for the offer is titled "Traffic Mitigation Offer to Snohomish County". This form is typically provided to all applicants along with this traffic study checklist. In addition, copies are available from the County contacts or on the County's web site shown in Section Five below.

Section Five (5) County and City Contact Information

5(a) County Contact information

PDS Traffic Reviewers 425-388-3311

Mark Brown, mark.brown@snoco.org

Chad Haubrich, chad.haubrich@snoco.org

David Irwin, david.irwin@snoco.org

DPW Traffic 425-388-3184

Elbert Esparza, elbert.esparza@snoco.org

County Web Site www.snohomishcountywa.gov/888/Traffic-Mitigation-Concurrency

5(b) City Contact information

Gina Hortillosa PE PMP Director Director of Public Works and Development Services 15728 Main Street Mill Creek, WA 98012 Direct (425) 921-5708 ginah@cityofmillcreek.com	For additional information use the following link to access to the City's web site: cityofmillcreek.com
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Section Six (6) City Development Traffic Percentage Influence Area Map

