

Exhibit 22

Ms. Christi Amrine
City of Mill Creek
15728 Main Street
Mill Creek, WA 98012

December 18, 2018

Re: The Farm at Mill Creek

Dear Christi:

Community Transit appreciates the opportunity to provide comments on long range planning projects and current development proposals being considered by our jurisdictional partners. Because local land use authorities have the greatest impact on our ability to provide transit service, it is our policy to evaluate projects for their compatibility with Community Transit's current operations and Long Range Transit Plan to ensure the agency can continue to provide public transportation and services in an efficient manner throughout Snohomish County. Staff is providing the following comments in response to the Farm at Mill Creek.

Community Transit has two bus routes that serve the subject property, as well as a Park and Pool facility at the adjacent Advent Lutheran Church. Demand for transit services is growing in this area and provides a viable alternative to single occupant vehicle trips. The traffic study does not include transit information, so we are providing the following information regarding existing services:

- Local Bus Route 109. This route operates between Lake Stevens and Ash Way Park & Ride 7 days a week. Monday through Friday the bus comes every 30 minutes between approximately 5 AM and 10 PM. This route also connects with other local and regional bus service at Mariner Park & Ride and Ash Way Park & Ride and will have a direct connection to the *Swift* Bus Rapid Transit (BRT) Green Line beginning March 2019. Since Route 109 began service in September 2016, ridership has nearly doubled.
- Commuter Bus Route 412. Route 412 provides service between the Silver Firs neighborhood and downtown Seattle. This weekday service is peak directional and peak period with 12 morning trips heading into Seattle between approximately 5 AM and 8 AM, and 12 afternoon trips coming back from Seattle between approximately 2 PM and 6:15 PM. Community Transit is also seeing growth in ridership on this route, an increase of 8% since 2016.
- Advent Lutheran Church Park & Pool – Community Transit has increased the number of leased stalls twice since the facility opened. There are now 64 stalls available for bus riders, and the facility is typically 80% full during the week.

Community Transit also identifies 128th St SE and 132nd St SE as Transit Emphasis Corridors (TEC) in the Long Range Plan. This designation means that as funding becomes available and demand warrants it, Community Transit will focus resources into this corridor to provide higher frequency services. Finally, this corridor is identified as part of the future *Swift* BRT network, with service to Cathcart.

In addition to the traffic impacts fees proposed in the Traffic Report, we are requesting the following mitigation to encourage mode shift to transit:

1. Improve the existing bus stop pair at 132nd St SE and 39th Ave SE. In addition to the proposed improvements for the eastbound bus stop on the southeast corner of 132nd St SE and 39th Ave SE, with the frontage improvements, we are requesting bus shelters for both stops.
2. Community Transit requests the proposed eastbound bus stop at 132nd St SE and 39th Ave SE be in-lane, instead of the pull-out illustrated on the site plan. Buses get trapped in pull-outs, increasing the time and cost to operate service.
3. We request the existing westbound bus stop on the northwest corner of 132nd St SE and 44th Ave SE be improved with a bus shelter. The bus pad standards are attached for reference, along with an example agreement for the installation of the shelter.
4. We support the reduction in the total number of off-street parking stalls.
5. In the future, Community Transit may run Double Decker buses on 132nd Ave SE and requests that trees in the street side landscaping be kept back from the sidewalk area, have an upright growth pattern, and a clearance of 14 feet between the road and bottom of the tree canopy to accommodate the tall buses.
6. Because this development is proposed as a mixed-use urban village, Community Transit encourages the City of Mill Creek to consider requiring transportation demand management (TDM) strategies to further mitigate unavoidable traffic impacts that will be created by this commercial and residential development. Specific strategies to consider are the establishment of a transportation coordinator position for the development who could connect travelers with existing bus, vanpool, carpool and non-motorized transportation options; require the developer to provide a transit pass program for both businesses and multi-family developments; provide preferential parking for carpools and vanpools. TDM strategies are vital to reducing SOV for both commercial and residential developments, which are the primary source of green house gas emissions in the Puget Sound region.

Thank you for the opportunity to provide comments for The Farm at Mill Creek proposal. Please feel free to contact me if you have any questions.

Sincerely,



Kate Tourtellot, AICP
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Community Transit
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Enclosure

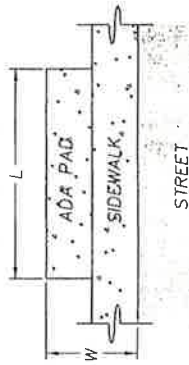
cc: Eric Goodman, Transportation Service Planner
Tony Smith, Capital Transit Planner
David True, Capital Development Program Manager

Improve existing bus stops with Type 4 Bus Shelter Pad and Shelter

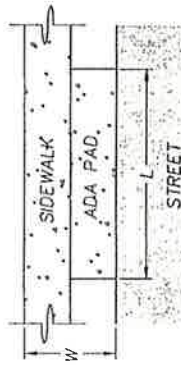


Change to in-lane bus stop and provide Type 4 bus shelter pad and shelter

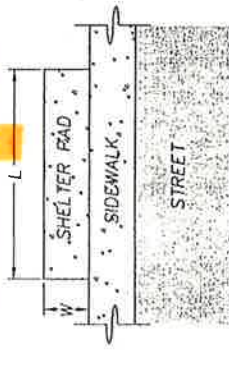
TYPE # 1a & 7



TYPE # 1b & 7



TYPE # 2, 3, 4, 5, & 6

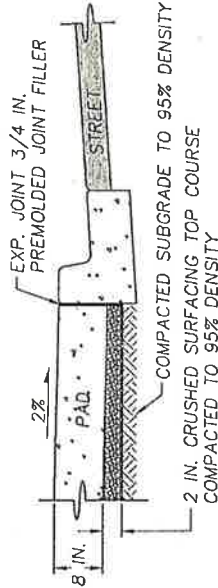
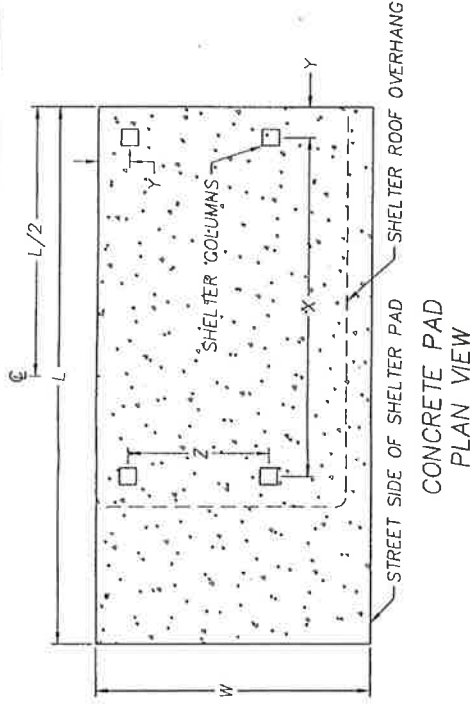


BUS SHELTER PAD SIZE MATRIX

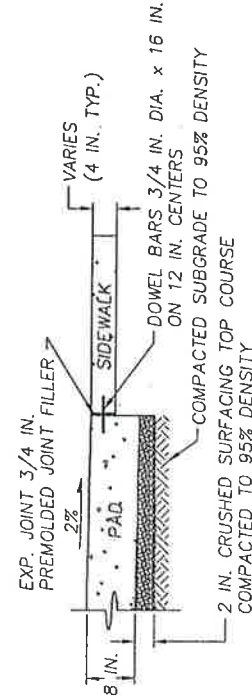
#	W = WIDTH	L = LENGTH	Y = OFFSET	X = SHELTER LENGTH	Z = SHELTER WIDTH
1	ADA PAD INCL. SIDEWALK 8.5 FEET	10 FEET	N/A	N/A	N/A
2	8.5 FT. SHELTER PAD W/O GARRAGE CAN 6 FEET	10 FEET	9 INCH		
3	12 FT. SHELTER PAD 6 FEET	14 FEET	9 INCH		
4	12 FT. SHELTER PAD W GARRAGE CAN 6 FEET	16 FEET	9 INCH		
5	12 FT. SHELTER AND ADA PAD 6 FEET	18 FEET	9 INCH		
6	DOUBLE SHELTER / PAD CONFIGURATION 6 FEET	30 FEET	9 INCH		
7	ADA PAD INCL SIDEWALK (FUTURE SHELTER OPT.) 10 FEET	10 FEET	9 INCH		

GENERAL NOTES:

1. ALL EARTH WORK SHALL BE PERFORMED IN ACCORDANCE WITH SNOHOMISH COUNTY SPECIFICATIONS. CLEARING AND GRUBBING SHALL BE EQUAL TO THE SHELTER PAD WIDTH + 5 FT. AND SHELTER PAD LENGTH + 5 FT.
2. IT WILL BE THE RESPONSIBILITY OF THE CONTRACTOR TO COMPLY WITH DOE, WSF&W, AND SNOHOMISH COUNTY EROSION CONTROL REQUIREMENTS. SILT FENCES SHALL BE INSTALLED AROUND THE PERIMETER OF THE CLEARING AND GRUBBING LIMITS WHEN EXISTING GRADES ARE OVER 10%.
3. AFTER THE CONCRETE SHELTER HAS BEEN CONSTRUCTED, EXPOSED SOIL SHALL BE HAND SEEDED AND STABILIZED.
4. THE CONTRACTOR SHALL CONSTRUCT THE SPECIFIED SHELTER PAD AS STAKED BY THE COMMUNITY TRANSIT REPRESENTATIVE. THE COMMUNITY TRANSIT REPRESENTATIVE WILL ONLY BE REQUIRED TO STAKE THE SHELTER CENTERLINE (C).
5. THE CONCRETE SHELTER PAD SHALL BE CONSTRUCTED OUT OF 4000 PSI CONCRETE. THE CONCRETE SHELTER PAD SHALL BE SLOPED 2% TOWARDS THE STREET. THE CONCRETE SHELTER PAD SHALL HAVE A LIGHT BROOM FINISH.
6. ALL EDGES AND JOINTS ARE TO BE EDGED WITH A 1/4 IN. RADIUS.



CONCRETE PAD/CURB CROSS SECTION



CONCRETE PAD/SIDEWALK CROSS SECTION



Community
Transit

STD. PLAN P-1

CONCRETE BUS
SHELTER PAD



DESIGNED BY
DARRELL SMITH
DRAWN BY
SHAD RICARD
DATE
DECEMBER 18, 1998