

**From:** [Pamela Stuart](#)  
**To:** [EIS](#)  
**Subject:** Sammamish Balanced Land Use and Mobility Analysis Draft EIS Comments  
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**[CAUTION - EXTERNAL EMAIL]**

The entire approach to the BLUMA EIS is backwards. An effort of this magnitude to try and justify a concurrency measurement pushed by the legislative body as opposed to laying out a study to find solutions to the needs of the community is not in the best interest of the community and will yield the results you are trying to get as opposed to an objective assessment and information from which to make sound decisions. This is backing into a desired outcome, an outcome that says we need to adjust our levels of service instead of identifying all the needs and goals, of which levels of service are part of the goals, identifying solutions, and then assessing options to meet needs and solve problems.

Then, the effort compares doing absolutely nothing (**not even road projects already approved on the adopted TIP with funding allocated and more than enough funds in the city's General Fund to cover the costs**) to "alternatives" that include unwarranted road projects (based on road conditions both pre and post pandemic) is not how we should be making changes to our comprehensive plan.

There is no analysis of practical and affordable transit options, like shuttles from key centers or neighborhoods around the city to transit centers like the light rail station opening at Marymoor or the transit center in Issaquah, just to name a couple off the cuff. **No city, especially not a city the size of Sammamish, should be trying to move people solely or predominantly in cars.** With everything we know about the climate crisis we face and the negative impacts that cars and paving over land to make roads create, we should be focusing our efforts on transit and reducing the number of car trips people need. Simply attempting to prevent new homes from being built is not going to solve any of our city or regional issues. Yet all that is investigated is creating 5 lane mega roads, even along our lake. Did anyone really need to spend this much time and money to determine that build a 5 lane mega road along our lake is a bad idea for the environment and will be really expensive and hard to do?

Issues with the analysis:

- Where is the identification of the needs of our community? What housing is needed today? How many people need or want a different type of housing?
- The city did not research the needs of the residents today and over the next 30 years in terms of housing, services, and transportation, public safety, and so on.
- We have data for parks and recreation needs and wants from the completed master plan for that area but do not have this level of data for all other needs and services, including but not limited to public safety, housing, human services, etc.
- The data gathered for Sammamish Home Grown, the housing strategy work done by the Planning Commission and ARCH was thrown out and should have been a foundation for further study. The Homegrown data did show that our city does not have enough of the housing that our residents need for older residents, those looking to downsize, those needing more services including transportation, those with physical challenges, families that are splitting and don't want to leave the community, etc. or for our children as they grow to become adults. It showed that there are housing needs not being met and that we need to understand those needs more to ensure our Comprehensive Plan accounts for all of the needs

of all of our residents.

- How have our demographics changed over the last 10 years and how do we anticipate them changing over the next 10, 20, and 30 years and how does that impact what is needed?
- There are no alternatives that evaluate how changing development patterns to be more environmentally and fiscally sustainable would impact the traffic. There are no alternatives that evaluate real transit options like running shuttles to the Light Rail station just outside our city's border. Or working with the school districts accommodate school drop off and pick up issues.
- There is no reasonable analysis of greenhouse gas emissions in so much as looking to reduce per capita emissions, which will clearly be needed for us to meet our commitment to the K4C goals. Where is the analysis of how much is being produced by Sammamish residents? How much by cars, other transportation, homes, other buildings? How are the solutions proposed going to increase or decrease overall and per capita greenhouse gas emissions? How do the proposed solutions move the city toward our commitment to K4C goals? Without any solutions addressed other than building more roads for more cars, everything looks bad.
- There are many other flaws in the analysis, like not taking into consideration how tree canopy loss would vary if we used transit options and multifamily versus single family and more roads and again, how we could change our types of the development to minimize that loss. With no plan for tree sending sites, any development will result in reduction in tree canopy, so why not consider those alternatives as well?
- Capacity numbers used in the V/C calculations are wrong. The estimated capacities are clearly lower than the actual road capacities, by a large and significant margin. The use of an artificially low capacity for a roadway invalidates all of the conclusions. For comparison, if one pours 8oz of water into a glass, the capacity of that glass is at least 1 cup. If a road has a measured hourly traffic count over 1400 vehicles per hour, the capacity of that road is AT LEAST 1400 vehicles per hour and yet the city uses numbers in the 800-950 range. Again, reverse engineering the result that is desired by the council majority as opposed to performing an accurate and objective analysis.
- The reduction of future development traffic numbers by 15% is not expanded upon. How was this number determined? Were current traffic numbers reduced by 15% as well?
- Assume calculations based on proposed land use changes but those proposals are not identified with the level of specificity you clearly needed to use in your calculations
- does not include the road estimates from our TMP to provide the public all available information
- Section 1.3 states that scoping comments were addressed. They were not. Some, but not all. But it was stated on video in public meetings that the city had no obligation to address any of those comments and thus did not have to provide any rationale or response as to why so many were not addressed. Approximately 75% of the comments supported more housing diversity and/or Enrich and Sustain approach to land use and many asked for environmentally sustainable options be addressed.
- Does not include road projects on the currently adopted TIP (from 2019) with funds associated and scheduled for completion within a 6-year period addressing existing LOS failures. These projects are included in the traffic model per policy but were EXCLUDED from this analysis.

The study proposes implementing additional traffic concurrency measures as if they are the solution. They are not. They are the metrics one captures to determine how a system is performing, the Levels of Service. And when that system drops below the desired performance levels, it means you need to dig in and find ways to improve the system. This analysis does not address the root cause issues nor real-world solutions.

In my 18 years living in this city, I rarely experience traffic issues that are not specifically at schools during school drop off/pick up and choke points **outside** of our city.

This analysis is equivalent to a Company's customer service team finding that the time to customer service representatives spend with each customer calling in for support has exceeded their Level of

Service. Here the level of service is, for example, no more than 5 minutes per call (sample only using an nice round number). That total call time of 5 minutes is equivalent to concurrency. Now, we can break that down into how long they wait on hold, how long to get to root cause, how long to get resolution, etc. all of those are different measure of LOS (or different concurrency measures, as is used in this study).

Following this example, the company does a study and concludes the only options are:

1. Do nothing
2. Add more measurements to how long customers wait and add new call centers that would operate at all hours of the day and night
3. Do number two plus assume that future customers will have different orders except that there is no real detail in what those “different” orders will be or why.
4. Do all of three plus add even more customer service representatives, even at times not needed.

At no point in time does this analysis look at reducing the customer issues...

In this EIS, NONE of the alternatives ask the biggest question – how can we reduce the number of car trips our residents have to make, both current and future residents.

We know that multifamily dwellings are infinitely more environmentally friendly – so why is there no analysis on how we can move more of our development patterns away from single family and towards multifamily? Less impervious surface per unit and per capita, more efficient and effective use of transit and other infrastructure, less roads required, more effective and efficient buildings (ie fewer exterior walls), can electrify easier, fewer cars, more walkability, more effective and efficient use of commercial space and other services, etc.

There is no analysis on actually implementing a city-wide Transfer of Development Rights (TDR) program which could truly change how we develop our land and preserve more open spaces. There is no analysis of a true transportation system – the city still has NO transportation master plan and has never done a thorough analysis of options to move residents to light rail. It does not address potential solutions to school drop/off and pick-up congestion. It does not address any intra-city transit.

The expense of this effort is not documented here, but based on the attorney time, consultants, and staff time, an estimate in the millions (\$2M-\$4M) of dollars is likely to justify a political position taken by council members is a travesty of governance and a huge waste of tax payer dollars.

Comprehensive plans should be updated to ensure they support, in a comprehensive manor, the needs of all residents today and over the next 30 years.

There are other issues with this study, but given that the premise is backwards, the capacity numbers are artificially and erroneously low, that assumptions and calculations are not all detailed, addressing every issue with this analysis is unnecessary.

Finally, this huge effort has been less than transparent and the public should understand what is here and what is not. With no real public outreach or discussions, public hearings should be held both with the planning commission and city council and the public should get more information and

have more of an opportunity to comment, once they understand how this analysis was performed and the implications.

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