

MEMO

To: Save Weyerhaeuser Campus
c/o Jean Parietti, Lori Sechrist

From: Ross Tilghman

Date: 8 November 2018

Subject: Greenline Warehouse A – Transportation Comments

I have reviewed the Traffic Impact Analysis (dated March 6, 2018 and prepared by TENW) for the proposed warehouse project on the Weyerhaeuser Campus, along with the City of Federal Way's Comprehensive Plan and municipal code. I have also reviewed the SEPA checklist, the Mitigated Declaration of Non-Significance and staff evaluation for the project. Additionally, I have looked briefly at the TIA for Greenline Business Park (dated April 27, 2018 and prepared by TENW). My comments follow.

- 1. The TIA does not include other known projects in the vicinity of the Weyerhaeuser Campus in its analysis.** Two significant known projects were excluded: the DaVita office expansion located at 32275 32nd Ave S; and the proposed Greenline Business Park consisting of over 1 million square feet of new development. City code requires traffic from background projects to be included in the traffic analysis once those projects have received a Capacity Reserve Certificate (CRC). More common SEPA practice for traffic analysis is to include projects that have already applied for land use approvals. In any case, the scale of the omitted projects makes the omission significant in terms of traffic volumes. For example, a separate traffic study for the Greenline Business Park project shows that it alone is expected to generate over 3,200 new daily vehicle trips, with 471 new trips in both the AM and PM peak hours, and DaVita's expansion will add still more trips. Since those projects anticipate opening in 2020 and 2021, they fall in line with the schedule proposed for Warehouses A and B (2019 and 2020, respectively).
- 2. The TIA should have used new counts in its analysis that reveal higher traffic volumes at Weyerhaeuser Way S/SR-18 to determine if mitigation of poor operations is warranted.** The TIA relies on counts from 2016 even though the author conducted new counts in 2017 for a

subsequent traffic study of the Greenline Business Park dated just seven weeks after the Warehouse A study. The resulting difference between the level of service findings at SR-18 is stark and unexplained.

Difference in LOS Results at Weyerhaeuser Way S/SR-18 Westbound Ramps		
	2020 with Warehouse A + B	
Document	AM Peak Hour LOS / Delay (secs) / v/c	PM Peak Hour LOS / Delay (secs) / v/c
Warehouse A TIA (March 6, 2018)	LOS D 41.0* 0.96*	LOS D 53.1 1.11
Greenline Business Park TIA (April 27, 2018)	LOS E 65.1 1.28	Not reported

* The delay and v/c ratio reported in Table 6 for the combined warehouses appear in error, with better results than for just Warehouse A in Table 5. The cause appears to be erroneously entered signal timing data. In any case, the extreme difference in results between the reports stands.

The new counts in October 2017 show somewhat higher volumes than the July 2016 counts used in the Warehouse A analysis. The Warehouse A study could easily have incorporated the new counts since the report was released nearly five months later, but clearly didn't do so.

It is possible that a recalculation of the projected 2020 volumes from the updated counts with Warehouse A & B would show LOS E, which would trigger the need to mitigate the SR-18 Westbound Ramp intersection. Also, the queuing analysis should be updated with the new counts and correct signal timing information and its results should be compared to observations of actual queues to determine its accuracy.

The peculiar result of this segmented analysis of Greenline's warehouses and business park is that the SR-18 ramp intersection would be mitigated by neither Warehouse A or B which claim not to cause LOS E, nor by the business park which claims that LOS E is a background condition. The applicant cannot have it both ways since its projects clearly create the LOS E condition that requires mitigation.

This circumstance of differing data points and results from the same applicant and consultant team underscores the need for the consistent, comprehensive analysis that an EIS provides.

- 3. TIA should include other known projects in its background analysis in order to show cumulative impacts for the morning peak hour.** Important impacts in the morning peak hour may be missed if known projects are excluded just because they have not yet received a Capacity Reserve Certificate. The CRC program addresses only the afternoon peak hour. However, warehouse, distribution and light industrial uses typically generate more traffic in the morning than in the afternoon, particularly with trucks. This is another reason why it is logical and reasonable to include known projects in the analysis, and not just those with a CRC.

Municipal code 19.90.190(2) allows the city to exercise its SEPA authority to mitigate sub-standard LOS results in the morning peak hour.

4. **The City should request additional analysis of the impacts of truck traffic on Weyerhaeuser Way north of the site, or measures to prevent trucks from being able to travel north of the site.** Noting that trucks will seek to avoid congestion on SR-18, the city expresses its concern about trucks travelling north of the site to reach the I-5/S. 320th interchange in terms of pavement strength. The city acknowledges that this is not a truck route. Accordingly, the city imposed a condition on Warehouse A requiring bonding for future street reconstruction should truck trips exceed a predetermined threshold. ***However, that condition should not become a de-facto reclassification of Weyerhaeuser Way S as a truck route.*** That significant policy change would require updating the Comprehensive Plan. And the city's concern should extend to other truck impacts on that route including safety and compatibility with adjacent single-family neighborhoods.

Site design could restrict truck access exclusively to and from the south. The site plan shows methods to discourage truck turns to the north, but it does not appear to prevent trucks from entering from the north. As this potential routing stems from concerns about avoiding congestion on SR-18, the city should question whether large scale warehouse and distribution uses are truly appropriate for this location.

5. **If it has not already done so, the applicant should apply for a new CRC.** A past CRC was issued for the previous Preferred Freezer/Orca Bay project on the site but that application has since been withdrawn. Per city code, the CRC expired with that withdrawal. A new CRC is required for Warehouse A and for Warehouse B.