

# **Laurelhurst Community Club**

**Serving 3,000 Households and Businesses in Seattle's Laurelhurst Neighborhood**

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September 17, 2008

Nora Gierloff  
Department of Planning and Development,  
700 Fifth Avenue, Suite 2000  
P.O. Box 34019  
Seattle, Washington 98124-4019

RE: Project Number 3008972, University Village Proposed Expansion

Dear Ms. Gierloff:

The Laurelhurst Community Club Board of Trustees has been briefed twice by representatives from University Village regarding Project Number 3008972, proposed expansion at U Village, and reviewed the September 2008 traffic impact analysis. We ask that an Environmental Impact Statement be mandated, that the traffic study be redone and public hearings scheduled.

Flaws in the traffic study: One basic flaw in the U Village traffic impact analysis is its reliance on the traffic analysis in the Children's Hospital Major Institution Master Plan Draft Environmental Impact Statement (DEIS). This is a draft document and the many flaws pointed out during the comment period in that process have not yet been reflected in the final EIS that will be released in the next couple of months. In the draft document, the existing trip generation data for that project was not based upon standard Institute of Transportation Engineers (ITE) rates. ITE rates are the industry standard for determining new trip generation data for such sites, rather than the complicated unverifiable modal split calculation that was used. For that project, the modal split trip generation does not appear to have been calibrated using actual count data as none were provided, thus making it impossible to determine its validity against actual conditions.

There are many other discrepancies and flaws with the Children's DEIS traffic study upon which University Village relies. For example, the DEIS grossly underestimates the number of vehicle trips per day. The DEIS estimates 8,400 vehicle trips per day, however, using the standard Institute of Transportation Engineers formula, the number of trips per day would be 42,000. No trip generation data was provided and no standardized calculations employed. It is highly questionable for University Village to base its traffic analysis on the Children's draft report. Even with the grossly underestimated trips in the Children's report, the estimate of the impact on Montlake Boulevard at NE 45<sup>th</sup> Street for overall travel times is increased by 29 percent. On Montlake Boulevard at SR 520 eastbound the increase would be 16 percent. And, at Five Corners the increase would be 39 percent (Table 3.10-6). These are dramatic increases and must be taken into consideration.

University Village notes in its traffic study that traffic associated with expansion of Children's Hospital is not directly included in the background forecasts because that expansion is proposed, not yet approved, and speculative. It was an error not to include this. The City's Major Institutions Code allows institutions to grow by balancing the public benefit of the expansion with the ability to minimize the impacts of expansion on surrounding communities. Children's Hospital will expand; it's just a matter of how much. Children's has proposed adding 1.5 million square feet of new development. This major expansion should have been considered and analyzed in the University Village study. The construction impacts of Children's expansion will commence in 2009 and the significant impacts cannot be discounted.

The many other flaws in the University Village traffic study are too numerous to mention. A few notable examples include: trip distribution levels in the University Village traffic study are inappropriately based on customer surveys. The study addresses the south and west sides of the property but nowhere does it address the east side where one of the main driveways leads directly to the current parking garage. This unsignalized driveway intersects with Union Bay Place NE near the Burke Gilman Trail crossing and NE 50<sup>th</sup> Street. This collector arterial is already highly impacted by University Village traffic and any increase in traffic would increase the danger level on the Burke Gilman Trail crossing. Regarding peak volumes and studies relied upon by University Village, it should be pointed out that as roadways, such as bridges, reach capacity, congestions means machine counts time out and do not provide an accurate count. The City mentioned this in its 2002 study for the University District stating under future conditions "*It is possible that the existing peak hour traffic counts are low because of the bottlenecks at the bridges and freeway ramps. The actual peak hour demand could be higher if those bottlenecks and backups were free flowing.*" These flaws should be addressed in a revised traffic plan and EIS.

Cumulative Impacts: The cumulative impacts of other planned development in the area should be analyzed in a revised University Village traffic study and a DEIS, especially those relating to transportation (traffic volumes, traffic circulation, parking) and land use. The cumulative impact analysis should include impacts of the not-yet-constructed Talaris project and other projects in the permit pipeline, expansion of Children's Hospital, transformation of Magnuson Park into a regional sports field complex, a plan that has been approved, and SR 520 replacement.

Parking: The University Village already has a parking deficiency. The Existing Parking Utilization Study shows that on three days during the lowest usage period of the entire calendar year, its overall parking utilization was already at 80 percent with 96 percent of the desirable surface lot spaces filled. Even the more inconvenient garage was at 56 percent of capacity. That would put them well within the desirable 85-90 percent during the bulk of the rest of the year and with insufficient parking during the holiday seasons. Meanwhile, University Village is asking to increase its building square footage by over 26 percent, but only increase its parking by 14 percent. The only possible outcome of that equation is to have insufficient parking most of the year.

Adequate parking must be provided to avoid the overflow parking onto surrounding residential streets and to serve University Village patrons. Transit service in the area is poor. It is unrealistic to expect shoppers to hop on the bus with kids, babies, strollers and packages from shopping. Similarly, the bulk of University Village patrons do not ride their bicycles to shop, although it is commendable that University Village provides secure bicycle storage for employees and bike racks for customers who chose that means of travel. Adequate parking with spaces that are standard-sized should be required to meet the needs of patrons and the surrounding communities.

Concurrency: The University Village traffic study incorrectly states that the proposed project would meet the City's transportation concurrency requirements. Concurrency is based on 1998 counts with no adjustment for future growth that is expected in the University district. The University Area Transportation Strategy (UATAC) Future Conditions Summary prepared for the Seattle Department of Transportation (January 2008) and on the Seattle Department of Transportation (SDOT) website identifies growth of traffic volumes during the peak hour increasing by a minimum of 10% and up to 69% on some arterials to the 2030 study year (Page 3 of Future conditions report). The screenline data from attachment T-7 (model forecasting) should be utilized for concurrency evaluation rather than the 1998 data. Or at least the major projects in the area need to be included in the pipeline as the director's rule only excludes minor projects as being within current adopted count data.

Mitigation: In its traffic study, University Village concludes that no mitigation is warranted by its proposed expansion. Because of the major deficiencies in the traffic study and the magnitude of the expansion, we question this assertion. Village employees and some shoppers currently park on both sides of NE 50<sup>th</sup> Street and on the east side of 30<sup>th</sup> Avenue NE, especially during holiday seasons. This makes navigation of those roadways difficult and dangerous for cars, bikes and pedestrians alike. Any growth of University Village should trigger mitigation on these streets, at minimum, requiring University Village to bring the streets to regulation widths and install sidewalks on both sides.

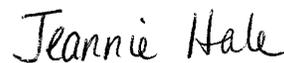
The fact that University Village is willing to voluntarily work with community groups to enhance vehicle and pedestrian safety is no substitute for the mandated mitigation required under the State Environmental Policy Act.

Conclusion: For the reasons outlined above, the Laurelhurst Community Club asks that an Environmental Impact Statement be mandated, that the traffic study be redone and public hearings scheduled. Thank you for considering our views.

Sincerely,



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