

Comment Letters on
Urban Growth Area Expansion Policies and Four-to-One Program Review

September 2023

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August 2, 2023

King County Growth Management Planning Council
201 South Jackson Street
Seattle, WA 98104

Re: Comments on Four-to-One Program Policies

Dear Growth Management Planning Council,

The City of North Bend would like to respond to additional correspondence received regarding the King County Countywide Policy amendments related to the Four-to-One Program. Staff received the letter from WSDOT and wanted to respond generally and to the comments made by WSDOT.

As you know, all planning related to the Growth Management Act is based on the current Urban Growth Boundaries. Maps available at the City and County show the current boundaries and do not separate the 1994 Boundary from future additions, in North Bend's case the 1996 JPA line. It only makes sense that policies take into account the current line being used by the City, County, and State in all growth considerations. Additionally, the Four-to-One Program, when used, adds protected open space from future growth. Wouldn't the addition of that amount of open space along the urban growth area line be positive?

The WSDOT letter refers to a potential development adjacent to the City of Snoqualmie and the I-90/SR18 Interchange and states that they have "assessed potential traffic impacts to the new interchange based on existing and projected volumes... before and after development." Their analysis is that "the development and growth ... could significantly increase delays and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project." However, shouldn't the project have taken into consideration projected growth in the City of Snoqualmie? It is our understanding that Snoqualmie is struggling to meet the growth targets and any project/land added using the Four-to-One Program would be used to meet the growth needs and not in addition to the targets required to be accommodated.

The process to add land to the Urban Growth Area Boundary is limited and highly scrutinized. The historical data shows the four-to-one program established in 1995 has only produced nine projects adding a total of 367 acres of the 4,000 acres allowed in 30 years. Three projects provided for 90% of the 367 acres of the new urban area. This is due to the complexity/restrictions of the Four-to-One Program and requirements for many jurisdictional reviews and approvals.

We respectfully suggest that state agencies work together on a comprehensive view and response to growth and environmental preservation, including but not limited to Commerce, WSDOT, DOE, and DOH. A small city cannot possibly meet the conflicting expectations and direction of state agencies. This is in addition to the County policies and PSRC requirements.

We look forward to continued engagement and thank you for considering our comments and feedback.

Sincerely,



Rob McFarland
Mayor
City of North Bend



Office of the Mayor

Katherine Ross

38624 SE River Street | P.O. Box 987
Snoqualmie, Washington 98065
(425) 888-5307 | kross@snoqualmiewa.gov

August 18, 2023

Robin Mayhew, AICP
Deputy Regional Administrator
WSDOT Northwest Region
P.O. Box 330310
Seattle, WA 98133

RE: City Response to July 12, 2023, WSDOT Letter to GMPC

Dear Ms. Mayhew,

This is regarding your recent letter to King County Growth Management Planning Council (GMPC). The City of Snoqualmie is making significant efforts to plan for and accommodate housing for all economic segments in accordance with the Growth Management Act (GMA) as part of the City's 2044 Comprehensive Plan update. A Housing Needs Analysis and Housing Strategy Plan, along with a Buildable Lands Analysis, were completed in the spring of 2023 to address the Department of Commerce's Projected Affordable Need and King County allocated growth target¹. The results of these studies indicate a limited amount of buildable land remaining within existing city limits. This is a notable change from Snoqualmie's considerable development over the past 20 years.

In 2009, the King County GMPC updated municipal targets, established a city target of 1,615 housing units and 1,050 jobs to be demonstrated and accommodated by the year 2031. We met and exceeded that demand with the development of Snoqualmie Ridge I and II more than ten years ago. Our 2044 growth targets are 1,500² housing and 4,425 jobs; and accommodating new growth will require tradeoffs and adjustments.

The King County Four-to-One Program using a potential JPA/UGB boundary would provide residential development opportunities with a limited density of R-8 (eight units per acre). Only a few select properties along the I-90/SR-18 interchange would be eligible to use this Program. We are aware of one property owner, (tax parcel 0223079063) who is interested in using the potential JPA/UGB boundary to develop a range of 51-94 units. No commercial development is included in this zoning. The final achievable density would be impacted by designated buffers and achieved open space stipulated in the Program as well as King County application and approval. To be clear, there is no planned development of 288 units, 576 bedrooms and 425 parking stalls, as stated in your letter. Furthermore, based on the recently completed

¹ **Growth Targets:** The Snoqualmie Valley has an adopted 2044 growth target of 2,656 units (*King County Urban Growth Capacity Report, June 2021*).

² **Affordable Projected Need:** The State draft methodology would allocate approximately 129,541 new affordable housing units at 0-30% Area Median Income (AMI) to King County, and over 308,000 total units to King County. The Valley's share of projected housing is approximately 1.6% with an expected 1,500 units for the City of Snoqualmie.

transportation assessment for the proposed project, vehicular impacts would be less than 1 percent on the I-90 westbound ramps and less than 0.5 percent on the I-90 eastbound ramps intersections with SR 18³.

Snoqualmie's achievable housing units may be lower than the current target in the King Countywide Planning Policies. A review of buildable land within the City's Potential Annexation Area (PAA) shows that out of the approximate 721 acres in the PAA, the current buildable land acres equate to approximately 98 acres⁴ and a portion of that development is anticipated to be commercial. To understand the City's limitations, our City Council held a Housing Policy Round Table on June 12, 2023. This resulted in steps to request an adjustment to the assigned housing targets based on existing studies and limitations on the City's ability to accommodate growth without an annexation into city limits along the I-90/SR-18 interchange.

It is clear that Snoqualmie's projected housing numbers will have little impact on the transportation corridor and should have already been built into WSDOT's assumptions. In addition, the City has repeatedly expressed our concerns about regional traffic and its impacts to Snoqualmie Parkway. This arterial is used as an extension of SR-18. In fact, the 2022 PSRC Regional Transportation Plan⁵ analysis showed that about 35% of traffic on the Snoqualmie Parkway is generated from outside the city, or regional in nature. This percentage increases to approximately 40% in future model years. Because the Parkway acts as a bypass route for commuters wanting to avoid SR-405 and I-5 congestion, it facilitates large movements of regional populations as well as freight from northern King County areas to east and southeast King County. Similarly, vehicles traveling on SR-18 use the Parkway to travel north to the cities of Redmond, Carnation, Duvall, and Monroe. We hope you have included this increasing regional traffic in your assumptions of potential traffic impacts to the I-90/SR-18 interchange.

In summary, as the City most frequently affected by the I-90/SR-18 interchange, we desire the successful operation of WSDOT investments, and we appreciate your planning efforts. The King County Four-to-One Program using a JPA/UGB boundary would allow Snoqualmie to work towards achieving our housing targets, with minimal impact on traffic volumes. The City hopes you update your letter with the proposed local growth and traffic assumptions and provide to GMPC before the upcoming September 27, 2023, meeting.

Thank you for your consideration.

Sincerely,



Katherine Ross, Mayor
City of Snoqualmie

Encl: WSDOT King County GMPC Comments 7.12.23 Final
Snoqualmie Gateway Village Preliminary Transportation Assessment
cc: GMPC Planning Council
Ivan Miller, GMPC Lead Staff
Brian Parry, SCA Senior Policy Analyst
Lauren Smith, Director of Regional Planning
Sara Perry, King County Councilmember

³ Transpo Group Memorandum to GMPC, "Snoqualmie Gateway Village Preliminary Transportation Assessment" dated August 11, 2023.

⁴ Estimate of buildable acres based on removing from the total include homes, public/utility, tribal properties, critical areas and buffers including steep slope/buffers 50', landslide hazard/buffers 50', wetland/buffers 225' and streams/buffer of 100'.

⁵ Regional Transportation Plan 2022-2050, dated May 26, 2022



July 12, 2023

King County Growth Management Planning Council
c/o Ivan Miller, GMPC Lead Staff
King County Office of Performance, Strategy and Budget
Mail Stop CNK-EX-0810
Chinook Building 401 5th Ave Ste 810
Seattle, Washington 98104

Dear Members of the Growth Management Planning Council,

Thank you for the opportunity to review and comment on the King County Growth Management Planning Council's (GMPC) recommended amendments to the King County Countywide Policies. WSDOT has the following comments on the amendments that will guide future expansions of the county's Urban Growth Area (UGA).

The amendments recommended by the GMPC on May 17 would follow GMPC Chair Constantine's proposal to amend the language across the policies to consistently use the original 1994 UGA line as the baseline for the county's Four-to-One UGA expansion program. However, it would provide two exceptions — one for the City of Snoqualmie and the other for City of North Bend. For these cities, the Joint Planning Areas (JPAs) adopted after the original 1994 UGA was established would be the baseline used for the Four-to-One program instead.

WSDOT supports the use of the 1994 UGA when evaluating UGA expansion requests but does not support making exceptions for select jurisdictions. The exception under consideration comes from the City of Snoqualmie in its October 11, 2022 letter to the GMPC. The city specifically notes that the (currently rural zoned) properties adjacent to the I-90/SR-18 Interchange may be an appropriate area for the UGA to be expanded. As noted in our comment letter provided to GMPC at its January 2023 meeting, WSDOT is constructing a \$188 million upgrade to the I-90/SR-18 Interchange to address performance deficiencies and address community concerns around safety. The interchange was designed to accommodate demand based on the city and county land use plans adopted at the time of design (2019). Allowing the use of the JPAs for the City of Snoqualmie and the City of North Bend will allow higher intensity development up to and around the new I-90/SR-18 Interchange and along I-90 that can result in unanticipated impacts to the investments in the area.

WSDOT is aware that potential urban development is already being studied for some of these areas, should the recommended policies be adopted. For example, a feasibility study was recently conducted for a residential development located directly north of the I-90/SR-18 Interchange at SE 99th Street and Snoqualmie Parkway. This study evaluated the construction of 288 units, including 576 bedrooms and 425 parking stalls. While the exact development that would be proposed if the recommended policies are adopted is not certain, we have assessed potential traffic impacts to the new interchange based on existing and projected volumes from the I-90/SR 18 Interchange Justification Report (IJR) analysis before and after development at a similar urban intensity is complete. Based on our analysis, the development and growth that wasn't considered in the IJR analysis could lead to 2045 design year volumes being reached much earlier, significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.

Councilmembers

July 12, 2023

Page 2

There are numerous examples of the types of development that could be expected at similar locations, adjacent to freeways with convenient access from all directions. For example, five miles east of I-90/SR 18 at the SR 202/Bendigo Boulevard interchange in North Bend, just north of the westbound off-ramp is a shopping center covering approximately 25 acres. A midweek count from June 2013 shows about 315 vehicles entering from the south and 135 vehicles exiting to the south. With growth in volumes on I-90 as well as the surrounding communities over the last 10 years it's likely those numbers are higher today. In comparison to this 25-acre site, the area around the I-90/SR-18 Interchange that could be included in the UGA should the recommended exception be allowed for City of Snoqualmie is approximately 85 acres.

Other key concerns of WSDOT:

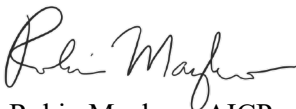
- The recommended policies allowing exceptions for select jurisdictions are based on a request with urban development already in mind, not based on a countywide or regional need or policy rationale.
- The recommended policies do not include criteria that would guide and limit other cities from requesting the use of their JPA for the Four-to-One program instead of the 1994 UGA boundary. This could result in additional JPAs located in areas beyond the contiguous UGA where larger parcels are more likely available and more easily qualify for the Four-to-One expansion program, which ultimately could undermine the use of the 1994 UGA as the baseline for the program and result in more unplanned and unanticipated challenges on the local, regional, and state transportation network.

The design and successful operation of WSDOT investments relies on consistency with, and predictability from, the comprehensive plans that cities and counties adopt, including the 20-year land use assumptions. For the City of Snoqualmie and City of North Bend (and all others in King County), areas to accommodate future population and employment growth have already been identified and agreed upon with King County. These are the areas within existing city boundaries and Potential Annexation Areas (PAAs) and are where future growth should be planned for prior to expansions of the UGA.

In closing, WSDOT supports using only the 1994 UGA as the criteria for expansions to the UGA under the Four-to-One program. This approach is consistent with the Growth Management Act's intent to limit urban sprawl, protect rural lands and environmentally sensitive areas, promote infill development, and help ensure the investments in the regional and state transportation system serve the users in a safe and efficient way.

Thank you for consideration.

Sincerely,



Robin Mayhew, AICP
Deputy Regional Administrator
WSDOT Northwest Region

Enclosure – Attachment A – I-90/SR-18 Interchange Information

cc: Brian Nielsen, WSDOT Northwest Regional Administrator
Mark Leth, WSDOT Assistant Regional Administrator – Traffic
Steven Breaux, WSDOT Director of Legislative Relations
Jeff Storrar, WSDOT Policy Manager

Attachment A - I-90/SR-18 Interchange Assessment

A feasibility study was recently conducted for a residential development located directly north of the I-90/SR-18 Interchange at SE 99th Street and Snoqualmie Parkway that included the construction of 288 units, including 576 bedrooms and 425 parking stalls.

The following provides an assessment of potential traffic impacts to the I-90/SR18 Interchange Upgrade project based on existing and projected volumes from the I-90/SR 18 Interchange Justification Report (IJR) analysis before and after this level of urban development is complete.

As shown in the tables and figures below, the I-90/SR 18 interchange experiences peak directional flows during morning and evening commute periods. During the morning peak, traffic on southbound Snoqualmie Parkway is largely headed to westbound I-90, with smaller amounts heading to SR 18 or eastbound I-90. Traffic heading to northbound Snoqualmie Parkway is roughly split between eastbound (northbound) SR 18 and eastbound I-90, with a smaller amount from westbound I-90. During the evening peak the reverse occurs, with most traffic heading to northbound Snoqualmie Parkway coming from eastbound I-90 and much smaller amounts from eastbound SR 18 and westbound I-90. Traffic on southbound Snoqualmie Parkway is generally heading to westbound I-90 with a slightly smaller amount continuing onto westbound (southbound) SR 18.

AM Peak

Northbound to Snoqualmie Parkway

- From SR 18 – 40%
- From eastbound I-90 – 48%
- From westbound I-90 – 12%

Southbound to I-90 & SR 18

- To SR 18 – 8%
- To eastbound I-90 – 8%
- To westbound I-90 – 84%

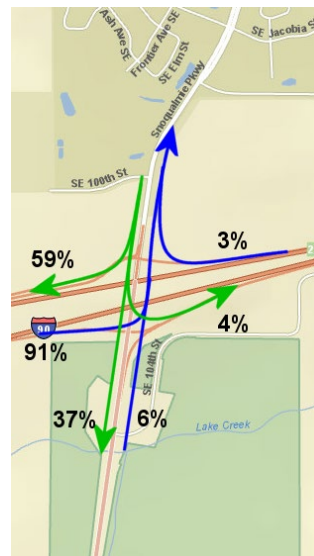
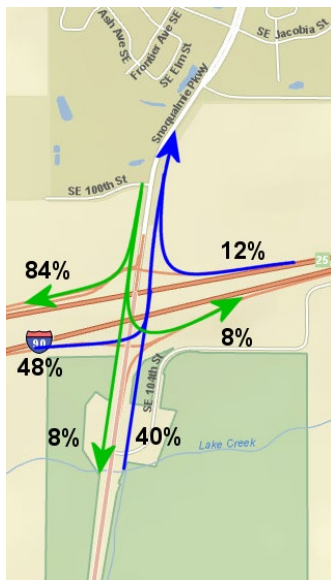
PM Peak

Northbound to Snoqualmie Parkway

- From SR 18 – 6%
- From eastbound I-90 – 91%
- From westbound I-90 – 3%

Southbound to I-90 & SR 18

- To SR 18 – 37%
- To eastbound I-90 – 4%
- To westbound I-90 – 59%



Based on the I-90/SR 18 IJR analysis, during both the AM and PM peaks the interchange is expected to operate with acceptable levels of service (LOS), queuing, and delay at the

Attachment A - I-90/SR-18 Interchange Assessment

eastbound and westbound I-90 ramps intersections during future interim (2035) and design years (2045).

Two critical movements are highlighted during the PM peak in the above table – eastbound I-90 to northbound Snoqualmie Parkway, and southbound Snoqualmie Parkway to westbound SR 18. Of traffic heading to northbound Snoqualmie Parkway, 91% of it originates from eastbound I-90 and traverses through the interchange. Likewise, 37% of traffic heading from southbound Snoqualmie Parkway continues through the interchange to westbound SR 18. In general, any new traffic generated by development in this area could be expected to follow the same general distribution. As volumes grow, conflicting movements like these compete for signal time additional delays and queues.

In the case of the I-90/SR 18 interchange, development and growth that wasn't considered in the project analysis could lead to 2045 design year volumes being reached much earlier, significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.

There are numerous examples of the types of development that could be expected at similar locations, adjacent to freeways with convenient access from all directions. For example, five miles east of I-90/SR 18 at the SR 202/Bendigo Boulevard interchange in North Bend, just north of the westbound off-ramp is a shopping center covering approximately 25 acres. Included here are at least nine restaurants (four with drive-throughs), two drive-through coffee shops, three gas stations (two with convenience stores), a grocery store, and other businesses found in similar developments (bank, auto parts store, vehicle licensing, dry cleaner, etc.). No recent turning movement counts were available, but a midweek count from June 2013 shows about 315 vehicles entering from the south and 135 vehicles exiting to the south. With growth in volumes on I-90 as well as the surrounding communities over the last 10 years it's likely those numbers are higher today. In comparison to this 25-acre site, the area around the I-90/SR-18 Interchange that could be included in the UGA should the recommended exception be allowed for City of Snoqualmie is approximately 85 acres.

MEMORANDUM

Date:	August 11, 2023	TG:	1.23255.00
To:	Growth Management Planning Council (GMPC)		
From:	Michael Swenson, PE, PTOE & Bornha Khedri		
cc:	Ivana Halvorsen, Barghausen		
Subject:	Snoqualmie Gateway Village Preliminary Transportation Assessment		

This memorandum summarizes the traffic assessment conducted for the proposed Snoqualmie Gateway Village project impacts on the I-90/SR 18 interchange. Comments provided to date by WSDOT suggests that development on this site will overload the new interchange configuration. The development density assumed in this analysis is less than what was stipulated by WSDOT, but is consistent with zoning and site development limitations.

Project Description

The proposed Snoqualmie Gateway Village development would include the construction of 92 new multifamily units as affordable and workforce housing. The project is located west of Snoqualmie Parkway and south of SE 99th Street. The apartment complex is a combination of 2-story and 3-story buildings. No direct access proposed via Snoqualmie Parkway based on the future interchange influence area. Instead, two full access driveways along SE 99th Street have been identified, approximately 500 feet and 1000 feet west of Snoqualmie Parkway. The project preliminary site plan is shown in Figure 1. Based on zoning limitations, no commercial uses are proposed within the development.



Figure 1: Preliminary Site Plan

Trip Generation

Trip generation forecasts are based on equations from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 11th Edition (2021). The equations for the proposed uses were based on ITE's Multifamily Low-Rise (LU #220) land use. The anticipated trip generation for the proposed development is shown in Table 1. Detailed trip generation calculations are included in Attachment A.

Table 1. Forecast Weekday Vehicle Trip Generation

Land Use	Size	Daily	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Multifamily Low-Rise (LU #220)	92 DU	666	12	39	51	38	22	60

Notes: DU= dwelling unit

1. Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition (2021)

As shown in Table 1, the proposed project is anticipated to generate approximately 666 daily, 51 AM peak hour, and 60 PM peak hour trips.

Project Trip Distribution and Assignment

Travel patterns for vehicular traffic to and from the proposed site were based on a review of existing travel patterns as well as future travel pattern forecasts following the peak directional percentages on the major roadways. Future forecasts were derived from the I-90/SR 18 Interchange Justification Report Addendum¹. The project trip distribution and net new trip assignment are shown in Figure 2.

¹ I-90/SR 18 Interchange Justification Report (IJR) Addendum, Prepared for Washington State Department of Transportation, Jacobs, August 2019



Figure 2: Project Proposed Trip Distribution and Assignment

Future Traffic Volumes

The future 2035 and 2045 volume forecasts² are shown on Figure 3 by movement for the intersections of SR-18/I-90 WB Ramps and SR-18/I-90 EB Ramps. Attachment B includes relevant pages from the IJR report. In addition, the project trip assignment at these locations is also shown in the figure.

² I-90/SR 18 Interchange Justification Report (IJR) Addendum

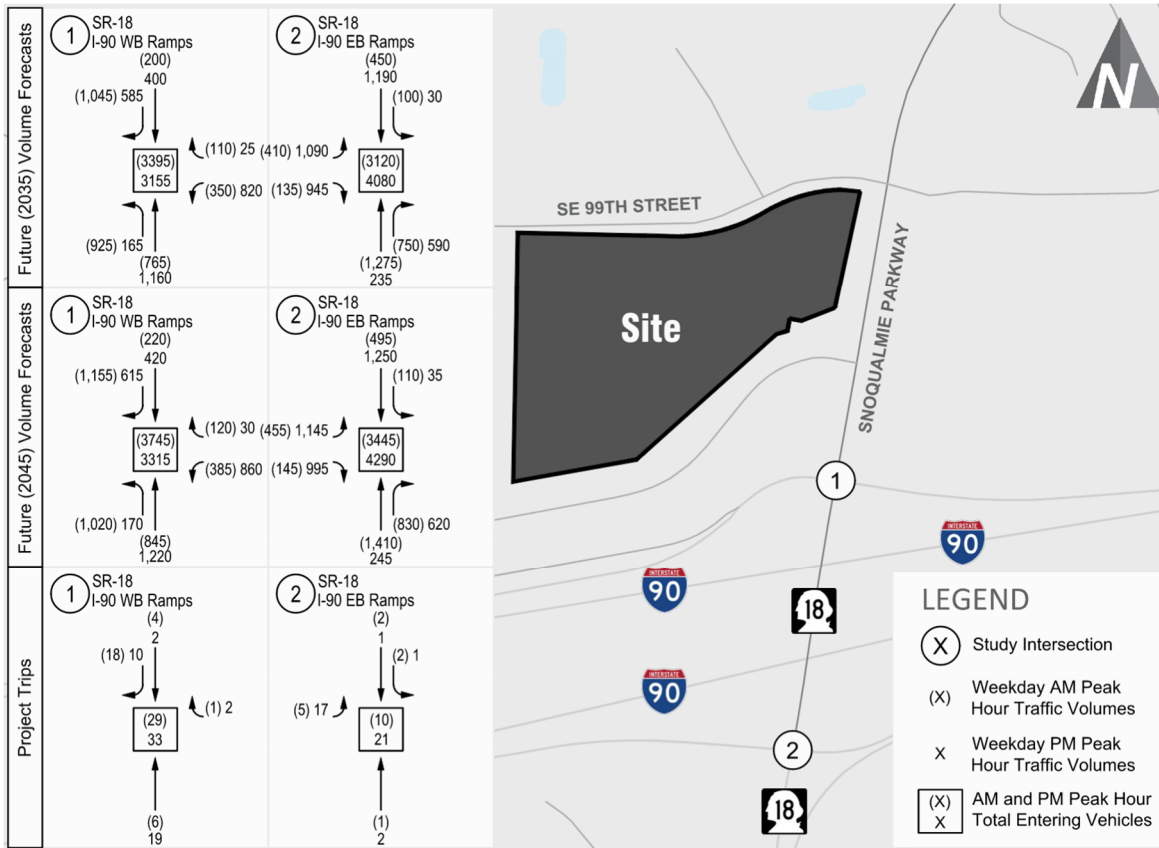


Figure 3: Weekday AM and PM Peak Hour 2035 and 2045 volumes forecasts and project trips

Traffic Volume Impact

Table 2 summarizes the percent of traffic volumes at the study intersections that are attributable to the proposed project during the weekday AM and PM peak hours. The comparison is made for both the 2035 and 2045 future years as the volume forecasts are available for both years.

Table 2. Future (2035 and 2045) Traffic Volume Impacts at SR-18/I-90 Interchange Intersections

Intersection	Peak Hour Total Entering Vehicles					
	2035 Without- Project Forecast	Project Trips	Percent Impact	2045 Without- Project Forecast	Project Trips	Percent Impact
AM Peak Hour						
1. SR-18/I-90 WB Ramps	3,395	29	0.9%	3,745	29	0.8%
2. SR-18/I-90 EB Ramps	3,120	10	0.3%	3,445	10	0.3%
PM Peak Hour						
1. SR-18/I-90 WB Ramps	3,155	33	1.0%	3,315	33	1.0%
2. SR-18/I-90 EB Ramps	4,080	21	0.5%	4,290	21	0.5%

As shown in Table 2, the proposed project is anticipated to account for less than 1.0 percent of the total traffic at the intersection of SR-18/I-90 WB Ramps under both weekday AM and PM peak hour conditions. In addition, for the SR-18/I-90 EB Ramps intersection, the percent impact of the project trip generation is between 0.3 to 0.5 percent.

This level of impact is not significant enough to impact the operations of the interchange given the significant scope of the improvements that are underway. The forecasts prepared for the interchange account for regional growth and development in the Snoqualmie area of which this project would represent a fraction of the total. According to the IJR addendum, demand is forecast to be shifted from other East King County routes onto SR 18 and through the interchange due to the capacity improvements. The report states that these shifts provide *“a conservative forecast and operational analysis in the 2045 design year to provide confidence that the Project improvements can accommodate future growth in the area”*³.

Summary and Findings

- The proposed project includes development of a 92 unit multifamily low-rise complex. Access to the site is proposed via two full access driveways along S 99th Street.
- The development is anticipated to generate 666 daily, 51 weekday AM peak hour and 60 weekday PM peak hour trips.
- Based on a review of the future 2035 and 2045 forecasts and comparison with the project trips passing through the I-90/SR 18 interchange, the percentage of vehicular impact is less than 1 percent on the I-90 WB Ramps and less than 0.5 percent on the I-90 EB Ramps intersections with SR 18.

³ I-90/SR 18 Interchange Justification Report (IJR) Addendum

Attachment A: Trip Generation Calculations

1.23255.00 - Snoqualmie Gateway Village

<u>Proposed Use</u>										
								Total Net New		
Land Use	Setting	Size	Units	Model	Equation	Rate	Inbound %	Inbound	Outbound	Total
Multifamily (Low-Rise) (LU 220)		92	du							
Daily	General Urban/Suburban			Equation (lin)	$T = 6.41X + 75.31$	-	50%	333	333	666
AM Peak Hour	General Urban/Suburban			Equation (lin)	$T = 0.31X + 22.85$	-	24%	12	39	51
PM Peak Hour	General Urban/Suburban			Equation (lin)	$T = 0.43X + 20.55$	-	63%	38	22	60
<u>Subtotal</u>										
Daily								333	333	666
AM Peak Hour								12	39	51
PM Peak Hour								38	22	60

Notes:

1. Trip rates based on Institute of Transportation Engineers' (ITE) *Trip Generation* 11th Edition equation and average trip rates as shown above.

Attachment B: Relevant Pages from I-90/SR 18
Intersection Justification Report Addendum

Appendix T24A

IJR Addendum Signed

Washington State Department of Transportation

I-90/SR 18 I/C to Deep Creek – Interchange Improvements & Widening

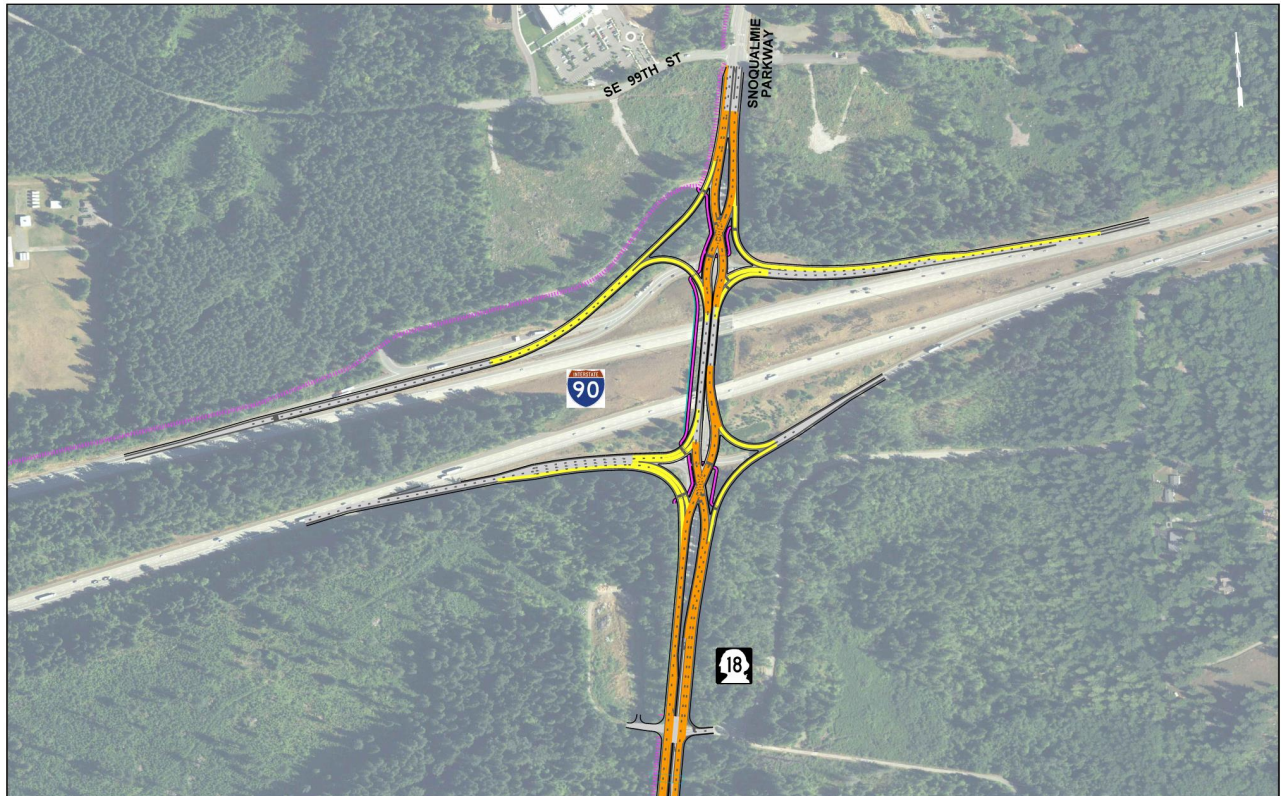
Request for Proposal

August 2, 2021



**Washington State
Department of Transportation**

I-90/SR 18 Interchange Project



Interchange Justification Report Addendum

Prepared for

Washington State Department of Transportation

August 2019



volumes and model volumes to be converted into future forecast volumes more suitable for the analysis of the 2025 and 2045 No Build and Build alternatives.

The travel demand models developed for the study represents average weekday conditions. In the absence of a travel demand model for Sunday, the existing correlation between the weekday PM peak period field counts and Sunday PM peak period field counts were applied to the 2025 and 2045 weekday PM peak period forecasts to generate both No Build and Build conditions for that period.

3.4.2 2025 and 2045 No Build and Build Forecast Volumes

The forecasted volumes at the I-90/SR 18 interchange for 2025 and 2045 No Build and Build conditions are shown in Tables 3-5 through 3-7. The forecasted volumes show a weekday AM peak growth rate of 0.8 percent to 1.2 percent per year, and a weekday PM peak growth rate of 0.5 percent to 0.9 percent per year. Even though the Project does not generate new trips, it is forecasted to shift demand from other routes in East King County onto SR 18 and through the I-90/SR 18 interchange because of the Project's capacity improvements. This would be an increase of about 2 percent in volume by 2025 and between a 6 to 8 percent increase in volume by 2045. This provides a conservative forecast and operational analysis in the 2045 design year to provide confidence that the Project improvements can accommodate future growth in the area.

The increase in vehicle trips by 2045 is expected to be relatively higher than the increase in 2025 due to additional background improvement projects that are assumed in place in 2045 but not by 2025. These include:

- SR 18 Widening - Issaquah-Hobart Road SE to Tiger Mountain Park Entrance Widening, widen to four lanes with pedestrian and bicycle improvements
- SR 18 Widening - Tiger Mountain Park Entrance to Deep Creek Widening, widen to four lanes with pedestrian and bicycle improvements
- I-90 at Front Street North Interchange Improvements - Reconstruct the Front Street interchange

Table 3-5. 2018 Existing, 2025, and 2045 Build and No Build Forecast Volumes - Weekday AM Peak Hour

Location		2018 Existing (vph)	2025		2045	
			No Build (vph)	Build (vph)	No Build (vph)	Build (vph)
I-90 EB	West of SR 18 Interchange	1,175	1,225	1,240	1,360	1,455
I-90 WB	East of SR 18 Interchange	2,150	2,255	2,270	2,600	2,640
SR 18 NB	South of SR 18 Interchange	1,285	1,420	1,490	1,825	2,170
SR 18 SB	North of SR 18 Interchange	1,065	1,090	1,095	1,190	1,260
Total		5,675	5,990	6,095	6,975	7,525
Growth (%) ^a		-	5.6%	7.4%	22.9%	32.6%
Growth (%) per Year		-	0.8%	1.0%	0.8%	1.1%

^a Growth rate is calculated compared to the existing volumes.
vph = vehicles per hour

Table 3-6. 2018 Existing, 2025, and 2045 Build and No Build Forecast Volumes - Weekday PM Peak Hour

Location		2018 Existing (vph)	2025		2045	
			No Build (vph)	Build (vph)	No Build (vph)	Build (vph)
I-90 EB	West of SR 18 Interchange	3,545	3,685	3,775	4,095	4,490
I-90 WB	East of SR 18 Interchange	1,960	2,015	2,030	2,245	2,260
SR 18 NB	South of SR 18 Interchange	735	745	755	770	820
SR 18 SB	North of SR 18 Interchange	885	945	970	1,150	1,300
Total		7,125	7,390	7,530	8,260	8,870
Growth (%) ^a		-	3.7%	5.7%	15.9%	24.5%
Growth (%) per Year		-	0.5%	0.8%	0.5%	0.8%

^a Growth rate is calculated compared to the existing volumes.

Table 3-7. 2018 Existing, 2025, and 2045 Build and No Build Forecast Volumes - Sunday PM Peak Hour

Location		2018 Existing (vph)	2025		2045	
			No Build (vph)	Build (vph)	No Build (vph)	Build (vph)
I-90 EB	West of SR 18 Interchange	2,305	2,385	2,470	2,710	2,995
I-90 WB	East of SR 18 Interchange	3,825	3,920	3,970	4,255	4,370
SR 18 NB	South of SR 18 Interchange	980	990	1,005	1,025	1,075
SR 18 SB	North of SR 18 Interchange	710	760	800	910	1,030
Total		7,820	8,055	8,245	8,900	9,470
Growth (%) ^a		-	3.0%	5.4%	13.8%	21.1%
Growth (%) per Year		-	0.4%	0.8%	0.5%	0.7%

^a Growth rate is calculated compared to the existing volumes.

3.4.3 Weekday AM Peak Travel Metrics

Regional AM peak hour forecast metrics for the existing (2017), opening year (2025), and design year (2045) are shown in Table 3-8. The regionwide metrics, in general, show slight decrease in the VHT and VHD and increase in speeds with the build conditions.

Table 3-8. Regional EMME Model VMT, VHT, VHD, and Speeds – Weekday AM Peak Hour

Measures of Effectiveness	2017 Existing ^a	2025 No Build	2025 Build	2045 No Build	2045 Build
VMT	4,784,000	4,796,000	4,796,000	6,115,000	6,121,000
VHT	141,000	140,000	140,000	273,000	271,000
VHD	30,000	30,000	29,000	127,000	125,000
Average Speed (mph)	34	34	34	22	23

^a Regional data for existing year are based on 2017 (base year) EMME model.

Appendix A

Concept Determination Memo



**Washington State
Department of Transportation**

I-90/SR 18 Interchange and Weigh/Inspection Station Improvements Design Services Project

Concept Determination Memorandum

July 2019

Prepared By:

JACOBS



Figure 3. I-90/SR 18 Interchange AM Peak Hour Volumes

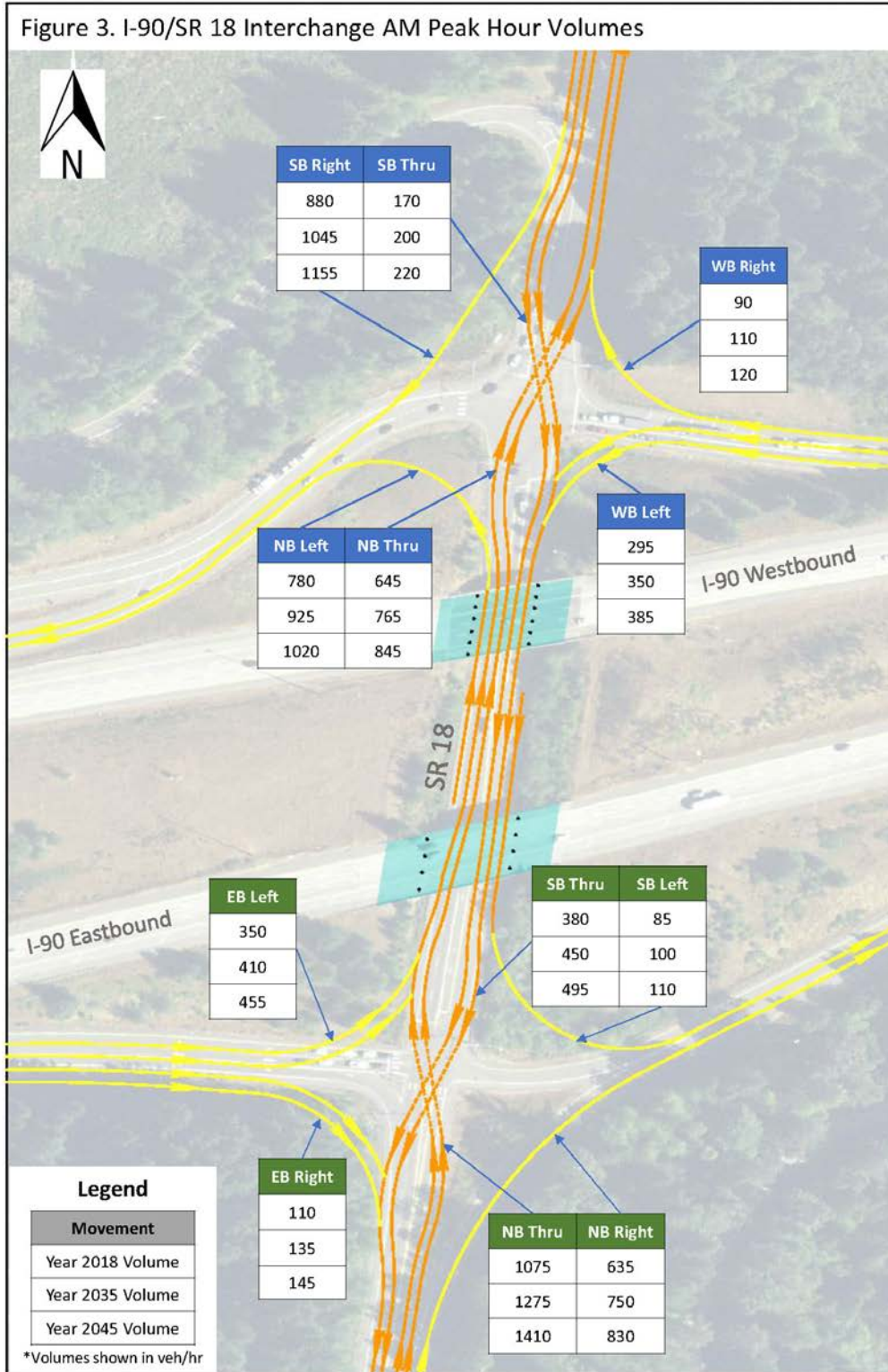
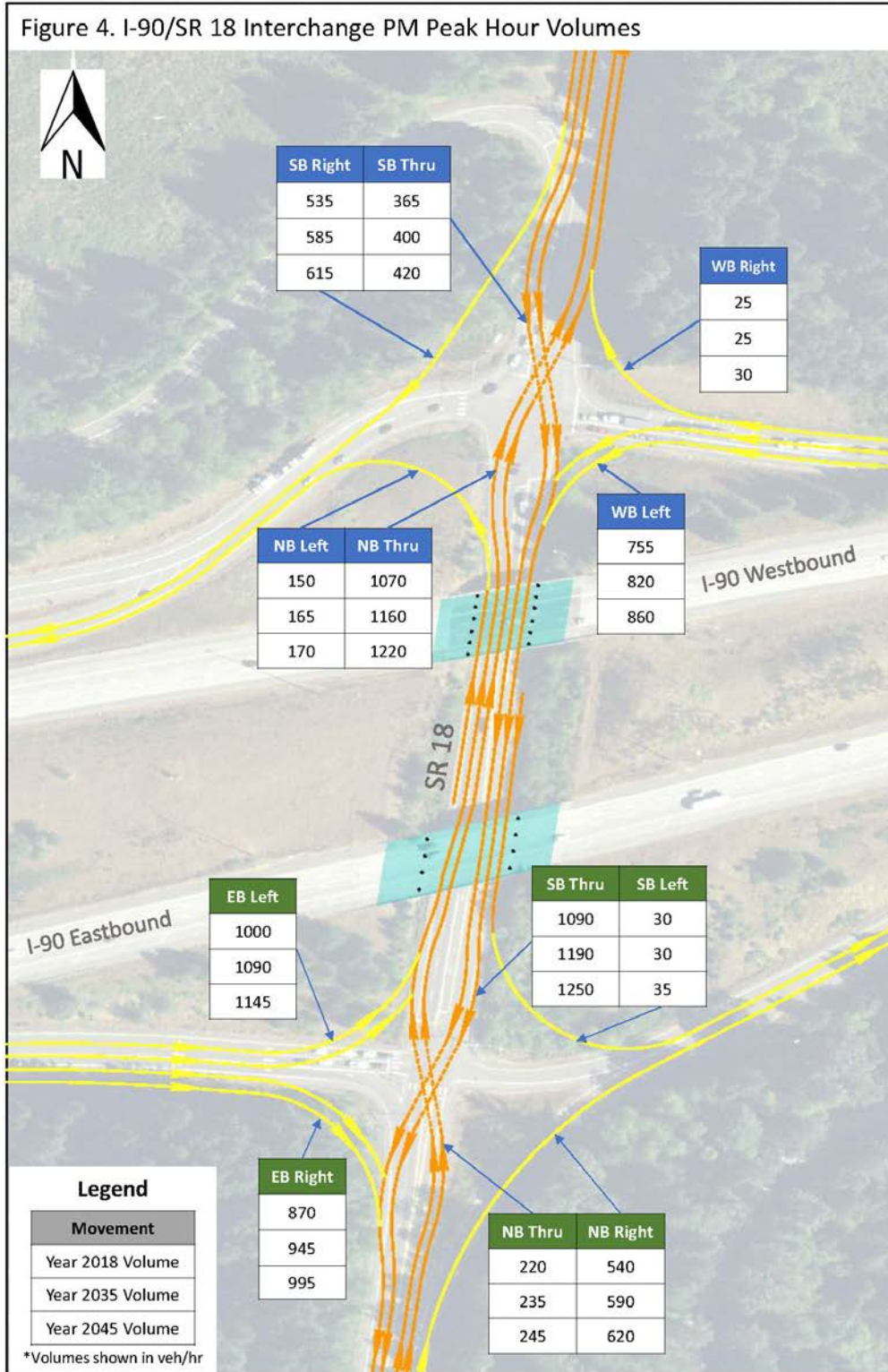


Figure 4. I-90/SR 18 Interchange PM Peak Hour Volumes



NOTE: UNRELATED TEXT REMOVED

Comments on Chapter 2 Urban Communities

Futurewise appreciates and supports the increased emphasis in this chapter on equity and health.

Futurewise supports the amendments to Policy U-134 to reflect allowing middle housing in appropriate residential zones.

Futurewise supports basing Four-to-One Program applications on the Urban Growth Area line adopted in 1994 as called for in existing Policy U-185. Allowing additional areas beyond the 1994 urban growth area (UGA) will increase development on the edge of the UGA where it is expensive to serve and will generate greenhouse gas pollution. For example, the Washington State Department of Transportation estimates that a proposed urban scale development beyond the 1994 UGA the new I-90/SR-18 Interchange “will significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.”¹ These adverse impacts are why existing Policy U-185 limiting Four-to-One Program applications on the Urban Growth Area line adopted in 1994. This is smart policy and should be retained.

NOTE: UNRELATED TEXT REMOVED

¹ Washington State Department of Transportation letter to King County Growth Management Planning Council p. 1 (July 12, 2023) at the Dropbox link in the last page of this letter of this letter with the filename: “WSDOT_King_County_GMPC_Comments_7_12_23_Final.pdf.”

Date: September 1, 2023

To: King County Growth Management Planning Council (GMPC)
Ivan Miller, Lead Staff, Growth Management Planning Council: ivan.miller@kingcounty.gov

Subject: Additional Comments—4:1 Program Review

As part of our continuing work on the **2024 KCCP Major Update (Update)**, our Joint Team of King County Rural Area UACs / UAAs/ Organizations (*) continues its interaction with the GMPC on key **Update** issues such as the *4:1 Program Review* and Urban Growth Area (UGA) *Expansion*. Previously, we provided either oral or Written testimony to the GMPC on January 25, March 22, May 3, and May 17—all in 2023. Herein we provide for your consideration *additional* Public Comment on the ongoing *4:1 Program Review*, specifically related to WSDOT's July 12, 2023, letter.

Introduction

Thank you for the opportunity to comment. Our Joint Team of Rural Area organizations has been involved with the GMPC's 4:1 Program Review since April of 2022. With new information our position on revisions and updates to the 4:1 Program has changed.

We support only the original 1994 UGA as the basis for 4:1 Projects and urge that the GMPC preliminary recommendation to use select JPAs be discarded. The July 12, 2023, WSDOT letter makes several important points with which we agree.

Use the 1994 UGA

Allowing 4:1 UGA expansions for the JPA of only Snoqualmie and North Bend has the potential to create significant issues in and around both cities. The amount of potentially Urban areas enabled by the JPA UGA can only be understood and evaluated by eventually including all JPAs. There is also no reasonable and structured basis for applying rules inconsistently in this way only for the benefit of select cities. When the JPAs were agreed to, each City understood and approved the boundary that was being set just like the 1994 UGA cities did. It was very clear at the time that these boundaries are long term, with clear policies and no 4:1s. The proposal to use some JPA Boundaries also creates precedent leading to potentially more issues should Black Diamond request the same approach.

WSDOT Letter

The WSDOT letter rightfully speaks to the need for certainty when planning large public infrastructure projects. This is a primary purpose of Growth Management. The JPA was never intended to be a line where expansion would occur within a long term planning horizon. Until the region as a whole documents the need for additional Urban land through accepted policies, there should be no allowance for select cities to do so on their own by enabling some JPA boundaries for 4:1. WSDOT is accurately stating its expected parameters of growth that were planned for with the expansion of the interchange at I-90 and Hwy 18.

Dangerous two-plus-mile backups are routine at the I-90 / SR-18 interchange and WSDOT is right to call out the fact that adding Urban in that area will likely lessen the effective life of the planned expansion for traffic purposes and necessitate further improvements much sooner than otherwise. And such improvements may not even be feasible as an add-on to what's been designed now for upcoming construction and within the budget. Planning should always take the long view to assure that current design decisions are consistent with longer range future needs and funding. And the governing jurisdictions need to respect and abide by those planning parameters.

Major Program Decisions Are Not Dictated By One Property

We are well aware there is a particular property that seems to be driving the request to use the JPA UGA for 4:1s. We also are aware this project recently has been redesigned and downsized.

We are very clear this decision is not about, and should never be about, one property. The City of Snoqualmie’s own letter seems to refer *only* to the potential traffic that may result from this project and ignores the other possible 4:1s that would be enabled. In fact, this decision enables many more properties to seek Urban uses, without any assessment of their potential impacts. Going further, the City of Black Diamond might seek the same concession in the future that could result in additional County-wide impacts. This is not a responsible way to do growth management planning and is, in fact, the opposite of principles established in GMA, as stated in RCW 36.70A.070(6)(vii)(c):

“The transportation element described in this subsection (6), the six-year plans required by RCW 35.77.010 for cities, RCW 36.81.121 for counties, and RCW 35.58.2795 for public transportation systems, and the ten-year investment program required by RCW 47.05.030 for the state, must be consistent.”

Such consistency cannot be determined without areawide comprehensive plan-level analysis, which the JPA proposal at hand totally ignores.

Recommendation

We request the GMPC *reconsider* its vote to include the JPA UGA of Snoqualmie and North Bend for the purpose of 4:1 expansions. We request 4:1 expansions continue to be sited only on the 1994 UGA, as is currently done.

Thank you for considering our comments herein as the GMPC continues its *4:1 Program Review*.

(*) *Enumclaw Plateau Community Association (EPCA), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hill Association (HHA), Soos Creek Area Response (SCAR), Upper Bear Creek Unincorporated Area Council (UBCUAC), and Vashon-Maury Island Community Council (VMCC).*

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cc: King County Council: ZCNCMEMBERS@kingcounty.gov
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John Taylor, Director, King County Department of Local Services: john.Taylor@kingcounty.gov
Robin Mayhew, Deputy Regional Administrator WSDOT NW Region: MayhewR@wsdot.wa.gov

Date: September 5, 2023

To: King County Growth Management Planning Council (GMPC)
Ivan Miller, Lead Staff, Growth Management Planning Council: ivan.miller@kingcounty.gov

Subject: SUPPLEMENT to Additional Comments—4:1 Program Review

On Friday, September 1, our Joint Team of King County Rural Area UACs / UAAs/ Organizations (*) provided the GMPC Additional Comments—4:1 Program Review.

To be complete, herein we provide a SUPPLEMENT to those Comments that directly address the GMPC changes—to the Countywide Planning Policies (CPPs), King County Comprehensive Plan (KCCP), and King County Code—voted on at its May 17 meeting regarding use of the 1994 Urban Growth Area (UGA) vs. the Joint Planning Agreements (JPA) UGA.

Specifically, we call for the phrases in **yellow highlighting** below to be **removed** (note: we have not used *strikethrough* editing, as there could be confusion with other *strikethroughs*, etc.).

In addition, we wish to *re-iterate* our opposition to the including of **Mixed-Use** in 4:1 transactions.

*King County **CPPs**, as adopted (Ordinance 19553) on 12/6/2022, and ratified by 03/31/2023
In the Development Patterns chapter, beginning on page 25, amend as follows:*

DP-17 Allow expansion of the Urban Growth Area only if at least one of the following criteria is met:

- ...
- b) A proposed expansion of the Urban Growth Area is accompanied by dedication of permanent open space to the King County Open Space System, where the acreage of the proposed open space:
- 1) Is at least four times the acreage of the land added to the Urban Growth Area;
 - 2) Is ~~((contiguous with))~~ adjacent to the original Urban Growth Area line adopted in the 1994 King County Comprehensive Plan, as amended by Joint Planning Area Agreements for the City of North Bend in Ordinance 12535 and the City of Snoqualmie in Ordinance 14117, with at least ~~((a portion))~~ half of the site to be placed in dedicated open space ((surrounding)) and shall fully buffer the proposed Urban Growth Area expansion from surrounding Rural Area and Natural Resource Lands; and

*King County **Comprehensive Plan**, as adopted (Ordinance 19555) on 12/06/2023
In Chapter 2: Urban Communities, beginning on page 2-34, amend as follows:*

U-185 Through the Four-to-One Program, King County shall actively pursue dedication of open space along the original Urban Growth Area line adopted in the 1994 King County Comprehensive Plan, as amended by Joint Planning Area Agreements for the City of North

Bend in Ordinance 12535 and the City of Snoqualmie in Ordinance 14117. Through this program, one acre of Rural Area zoned land may be added to the Urban Growth Area in exchange for a dedication to King County of four acres of permanent open space. (~~Land added to the Urban Growth Area for drainage facilities that are designed as mitigation to have a natural looking visual appearance in support of its development, does not require dedication of permanent open space.~~)

U-189 Land added to the Urban Growth Area under the Four-to-One Program shall:

-
- c. be physically ((contiguous)) adjacent to the original Urban Growth Area line adopted in the 1994 Comprehensive Plan, as amended by Joint Planning Area Agreements for the City of North Bend in Ordinance 12535 and the City of Snoqualmie in Ordinance 14117, unless there are limitations due to the presence of critical areas(~~(, and shall)~~);
-

*In the King County **Code**, Title 20, amend as follows:*

20.18.170 The four to one program – process for amending the urban growth area to achieve open space.

A. The purpose of the Four-to-One program is to create a contiguous band of open space, running north and south along the original Urban Growth Area line adopted in the 1994 King County Comprehensive Plan, as amended by Joint Planning Area Agreements for the City of North Bend in Ordinance 12535 and the City of Snoqualmie in Ordinance 14117.

20.18.180 The four to one program – criteria for amending the urban growth area to achieve open space. Rural area land may be added to the urban growth area in accordance with the following criteria:

A. A proposal to add land to the urban growth area under this program shall meet the following criteria:

....

3. The land added to the urban growth area shall:

a. be physically ((contiguous)) adjacent to the original urban growth area line as adopted in the 1994 King County Comprehensive Plan, as amended by Joint Planning Area Agreements for the City of North Bend in Ordinance 12535 and the City of Snoqualmie in Ordinance 14117, unless the director determines that the land directly adjacent to the urban growth area contains critical areas that would be substantially harmed by development directly adjacent to the urban growth area and that all other criteria can be met; and

Again, thank you for considering our comments herein as the GMPC continues its *4:1 Program Review*.

(*) Enumclaw Plateau Community Association (EPCA), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hill Association (HHA), Soos Creek Area Response (SCAR), Upper Bear Creek Unincorporated Area Council (UBCUAC), and Vashon-Maury Island Community Council (VMCC).

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John Taylor, Director, King County Department of Local Services: john.Taylor@kingcounty.gov
Robin Mayhew, Deputy Regional Administrator WSDOT NW Region: MayhewR@wsdot.wa.gov

JOINT RURAL AREA TEAM COMMENTS

RP-106 ***Except for Four-to-One proposals, King County shall not amend the Urban Growth Area prior to the Growth Management Planning Council taking action on the proposed amendment to the Urban Growth Area.***

We don't know why this has not been caught over the years, but this seems to *imply* that Four-to-One proposals are *exempt* from GMPC actions. The wording should be changed for better clarification.

NOTE: UNRELATED TEXT REMOVED.

JOINT RURAL AREA TEAM COMMENTS

NOTE: UNRELATED TEXT REMOVED.

Carnation Urban Growth Area Exchange
Carnation Urban Growth Area Exchange

Specific Comments

We understand this is a difficult issue. On the one hand the City of Carnation apparently does not support removing the site from its UGA or preserving it from urban uses without having land added to its UGA as a replacement. Such a “swap” would constitute a *UGA Exchange*.

However, we see no reason to create a *UGA Exchange* here, as the County already has robust, time-tested programs in place to handle such issues: *Four-to-One* and *Transfer of Development Rights (TDRs)*. For example, a TDR program could be explored within the City, where TDRs on the property in question could make something else within Carnation denser. This would appear to be a better solution than a *UGA Exchange*, where all proposed properties would have constraints. We support a solution that saves the agricultural use, but does not hurt the integrity of the adjacent Rural Area.

We would like to see this land protected and added to Tolt MacDonald Park that surrounds it on two sides and believe local citizens and the County want this as well, as it makes great sense. However, the idea of a *UGA Exchange* would need to be looked at carefully, as the devil would be in the details and it would need to be very limited as to where and how it might be used. In general, we do not support the concept of *UGA Exchanges* and are concerned about setting a precedent that could harm the integrity of the UGA elsewhere in the County.

NOTE: UNRELATED TEXT REMOVED.



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July 13, 2023

Chris Jensen
Comprehensive Planning Manager
King County Office of Performance, Strategy and Budget
401 Fifth Avenue, Suite 810
Seattle, WA 98104

RE: Draft King County Comprehensive Plan

Dear Comprehensive Planning Manager Jensen:

Thank you for the opportunity to write in support of proposed amendments to the King County's Countywide Planning Policies DP-17 and King County Comprehensive Plan U-185 which clarifies lands adjacent to the city of Snoqualmie's Urban Growth Area are eligible for consideration as part of the King County Four-to-One Program. If approved, these proposed amendments will provide opportunities for the City of Snoqualmie to help meet affordable housing targets, provide visual and ecological protection to the Mountains to Sound Greenway National Scenic Byway on Interstate 90, and conserve high quality open space and recreational lands.

Snoqualmie is a spectacular rural city due to its natural beauty, access to outdoor recreation, convenient location, and family-friendly environment. At the same time, the city needs more affordable workforce housing for area residents.

Amendments to DP-17 and U-185 are critical to allow the city to utilize the King County Four-to-One program for new affordable housing opportunities, open space conservation and other public benefits.

New Four-To-One projects that are allowed along the current UGA and infrastructure improvements will help fund Snoqualmie Parkway improvements such as the much-needed traffic light/roundabout at Southeast 99th street. The current situation at this intersection is dangerous to not only hospital patients but also their employees.

On behalf of the Mountains to Sound Greenway Trust, we will continue to support appropriate design of infrastructure which includes protection of the forested viewshed along the scenic byway, a scenic gateway for the city of Snoqualmie, separated trail connectivity for pedestrians and bicyclists, and land conservation utilizing the Four-To-One program.

Thank you for your consideration.

Sincerely,

Amy Brockhaus
Deputy Director



July 12, 2023

King County Growth Management Planning Council
c/o Ivan Miller, GMPC Lead Staff
King County Office of Performance, Strategy and Budget
Mail Stop CNK-EX-0810
Chinook Building 401 5th Ave Ste 810
Seattle, Washington 98104

Dear Members of the Growth Management Planning Council,

Thank you for the opportunity to review and comment on the King County Growth Management Planning Council's (GMPC) recommended amendments to the King County Countywide Policies. WSDOT has the following comments on the amendments that will guide future expansions of the county's Urban Growth Area (UGA).

The amendments recommended by the GMPC on May 17 would follow GMPC Chair Constantine's proposal to amend the language across the policies to consistently use the original 1994 UGA line as the baseline for the county's Four-to-One UGA expansion program. However, it would provide two exceptions — one for the City of Snoqualmie and the other for City of North Bend. For these cities, the Joint Planning Areas (JPAs) adopted after the original 1994 UGA was established would be the baseline used for the Four-to-One program instead.

WSDOT supports the use of the 1994 UGA when evaluating UGA expansion requests but does not support making exceptions for select jurisdictions. The exception under consideration comes from the City of Snoqualmie in its October 11, 2022 letter to the GMPC. The city specifically notes that the (currently rural zoned) properties adjacent to the I-90/SR-18 Interchange may be an appropriate area for the UGA to be expanded. As noted in our comment letter provided to GMPC at its January 2023 meeting, WSDOT is constructing a \$188 million upgrade to the I-90/SR-18 Interchange to address performance deficiencies and address community concerns around safety. The interchange was designed to accommodate demand based on the city and county land use plans adopted at the time of design (2019). Allowing the use of the JPAs for the City of Snoqualmie and the City of North Bend will allow higher intensity development up to and around the new I-90/SR-18 Interchange and along I-90 that can result in unanticipated impacts to the investments in the area.

WSDOT is aware that potential urban development is already being studied for some of these areas, should the recommended policies be adopted. For example, a feasibility study was recently conducted for a residential development located directly north of the I-90/SR-18 Interchange at SE 99th Street and Snoqualmie Parkway. This study evaluated the construction of 288 units, including 576 bedrooms and 425 parking stalls. While the exact development that would be proposed if the recommended policies are adopted is not certain, we have assessed potential traffic impacts to the new interchange based on existing and projected volumes from the I-90/SR 18 Interchange Justification Report (IJR) analysis before and after development at a similar urban intensity is complete. Based on our analysis, the development and growth that wasn't considered in the IJR analysis could lead to 2045 design year volumes being reached much earlier, significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.

Councilmembers

July 12, 2023

Page 2

There are numerous examples of the types of development that could be expected at similar locations, adjacent to freeways with convenient access from all directions. For example, five miles east of I-90/SR 18 at the SR 202/Bendigo Boulevard interchange in North Bend, just north of the westbound off-ramp is a shopping center covering approximately 25 acres. A midweek count from June 2013 shows about 315 vehicles entering from the south and 135 vehicles exiting to the south. With growth in volumes on I-90 as well as the surrounding communities over the last 10 years it's likely those numbers are higher today. In comparison to this 25-acre site, the area around the I-90/SR-18 Interchange that could be included in the UGA should the recommended exception be allowed for City of Snoqualmie is approximately 85 acres.

Other key concerns of WSDOT:


- The recommended policies allowing exceptions for select jurisdictions are based on a request with urban development already in mind, not based on a countywide or regional need or policy rationale.
- The recommended policies do not include criteria that would guide and limit other cities from requesting the use of their JPA for the Four-to-One program instead of the 1994 UGA boundary. This could result in additional JPAs located in areas beyond the contiguous UGA where larger parcels are more likely available and more easily qualify for the Four-to-One expansion program, which ultimately could undermine the use of the 1994 UGA as the baseline for the program and result in more unplanned and unanticipated challenges on the local, regional, and state transportation network.

The design and successful operation of WSDOT investments relies on consistency with, and predictability from, the comprehensive plans that cities and counties adopt, including the 20-year land use assumptions. For the City of Snoqualmie and City of North Bend (and all others in King County), areas to accommodate future population and employment growth have already been identified and agreed upon with King County. These are the areas within existing city boundaries and Potential Annexation Areas (PAAs) and are where future growth should be planned for prior to expansions of the UGA.

In closing, WSDOT supports using only the 1994 UGA as the criteria for expansions to the UGA under the Four-to-One program. This approach is consistent with the Growth Management Act's intent to limit urban sprawl, protect rural lands and environmentally sensitive areas, promote infill development, and help ensure the investments in the regional and state transportation system serve the users in a safe and efficient way.

Thank you for consideration.

Sincerely,



Robin Mayhew, AICP
Deputy Regional Administrator
WSDOT Northwest Region

Enclosure – Attachment A – I-90/SR-18 Interchange Information

cc: Brian Nielsen, WSDOT Northwest Regional Administrator
Mark Leth, WSDOT Assistant Regional Administrator – Traffic
Steven Breaux, WSDOT Director of Legislative Relations
Jeff Storrar, WSDOT Policy Manager

Attachment A - I-90/SR-18 Interchange Assessment

A feasibility study was recently conducted for a residential development located directly north of the I-90/SR-18 Interchange at SE 99th Street and Snoqualmie Parkway that included the construction of 288 units, including 576 bedrooms and 425 parking stalls.

The following provides an assessment of potential traffic impacts to the I-90/SR18 Interchange Upgrade project based on existing and projected volumes from the I-90/SR 18 Interchange Justification Report (IJR) analysis before and after this level of urban development is complete.

As shown in the tables and figures below, the I-90/SR 18 interchange experiences peak directional flows during morning and evening commute periods. During the morning peak, traffic on southbound Snoqualmie Parkway is largely headed to westbound I-90, with smaller amounts heading to SR 18 or eastbound I-90. Traffic heading to northbound Snoqualmie Parkway is roughly split between eastbound (northbound) SR 18 and eastbound I-90, with a smaller amount from westbound I-90. During the evening peak the reverse occurs, with most traffic heading to northbound Snoqualmie Parkway coming from eastbound I-90 and much smaller amounts from eastbound SR 18 and westbound I-90. Traffic on southbound Snoqualmie Parkway is generally heading to westbound I-90 with a slightly smaller amount continuing onto westbound (southbound) SR 18.

AM Peak

Northbound to Snoqualmie Parkway

- From SR 18 – 40%
- From eastbound I-90 – 48%
- From westbound I-90 – 12%

Southbound to I-90 & SR 18

- To SR 18 – 8%
- To eastbound I-90 – 8%
- To westbound I-90 – 84%

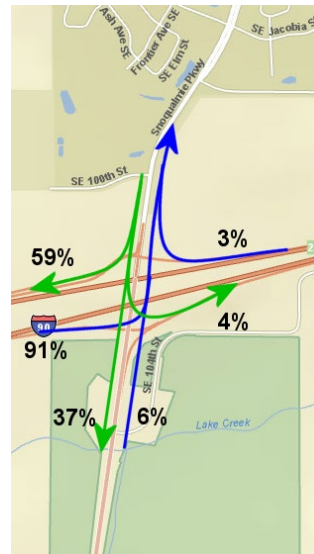
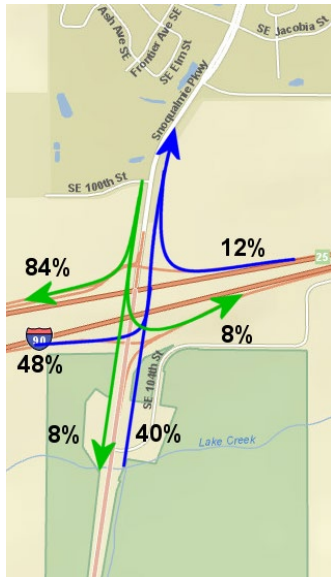
PM Peak

Northbound to Snoqualmie Parkway

- From SR 18 – 6%
- From eastbound I-90 – 91%
- From westbound I-90 – 3%

Southbound to I-90 & SR 18

- To SR 18 – 37%
- To eastbound I-90 – 4%
- To westbound I-90 – 59%



Based on the I-90/SR 18 IJR analysis, during both the AM and PM peaks the interchange is expected to operate with acceptable levels of service (LOS), queuing, and delay at the

Attachment A - I-90/SR-18 Interchange Assessment

eastbound and westbound I-90 ramps intersections during future interim (2035) and design years (2045).

Two critical movements are highlighted during the PM peak in the above table – eastbound I-90 to northbound Snoqualmie Parkway, and southbound Snoqualmie Parkway to westbound SR 18. Of traffic heading to northbound Snoqualmie Parkway, 91% of it originates from eastbound I-90 and traverses through the interchange. Likewise, 37% of traffic heading from southbound Snoqualmie Parkway continues through the interchange to westbound SR 18. In general, any new traffic generated by development in this area could be expected to follow the same general distribution. As volumes grow, conflicting movements like these compete for signal time additional delays and queues.

In the case of the I-90/SR 18 interchange, development and growth that wasn't considered in the project analysis could lead to 2045 design year volumes being reached much earlier, significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.

There are numerous examples of the types of development that could be expected at similar locations, adjacent to freeways with convenient access from all directions. For example, five miles east of I-90/SR 18 at the SR 202/Bendigo Boulevard interchange in North Bend, just north of the westbound off-ramp is a shopping center covering approximately 25 acres. Included here are at least nine restaurants (four with drive-throughs), two drive-through coffee shops, three gas stations (two with convenience stores), a grocery store, and other businesses found in similar developments (bank, auto parts store, vehicle licensing, dry cleaner, etc.). No recent turning movement counts were available, but a midweek count from June 2013 shows about 315 vehicles entering from the south and 135 vehicles exiting to the south. With growth in volumes on I-90 as well as the surrounding communities over the last 10 years it's likely those numbers are higher today. In comparison to this 25-acre site, the area around the I-90/SR-18 Interchange that could be included in the UGA should the recommended exception be allowed for City of Snoqualmie is approximately 85 acres.