



## Office of the Mayor

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**Katherine Ross**  
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Snoqualmie, Washington 98065  
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October 6, 2023

### Sent via email

Brian Nielsen, PE  
Regional Administrator  
WSDOT Northwest Region  
P.O. Box 330310  
Seattle, WA 98133

### **RE: City Response to WSDOT September 22, 2023, Letter to GMPC on JPA/UGA Recommendation**

Dear Mr. Nielsen,

The City would like to clarify several points from your recent letter to the King County Growth Management Planning Council (GMPC). We feel the three WSDOT areas of concern listed below are inaccurate or otherwise do not adequately reflect the City's perspective in facing challenges on Route Jurisdiction Transfer (RJT) request, the Four-to-One program, and Mill Site Development.

#### 1. City of Snoqualmie Route Jurisdiction Transfer (RJT) Request:

There are four criteria listed below under RCW, RCW 47.17.001(3) for Route Jurisdiction Transfer (RJT) Requests. The Snoqualmie Parkway meets criteria "d":

*An urban highway route that meets any of the following criteria should be designated as part of the state highway system:*

- (a) Is designated as part of the interstate system;*
- (b) Is designated as part of the system of numbered United States routes;*
- (c) Is an urban extension of a rural state highway into or through an urban area and is necessary to form an integrated system of state highways;*
- (d) Is a principal arterial that is a connecting link between two state highways and serves regionally oriented through traffic in urbanized areas with a population of fifty thousand or greater or is a spur that serves regionally oriented traffic in urbanized areas.*

The City of Snoqualmie believes the Parkway fully meets applicable criterion set forth in the statute as a link between State 202 and State Route 18 and Interstate I-90. Puget

Sound Regional Council<sup>1</sup> indicated in an email, dated July 18, 2023, that the Snoqualmie Parkway directly serves the Snoqualmie/North Bend urban area, which as of 2021 had a total population of approximately 25,000. The Snoqualmie/North Bend urban area also directly connects to the Seattle-Everett-Tacoma Urban area and as such it is also a part of the combined **Seattle-Everett-Tacoma Federal Highway Urbanized Area** that serves almost 4 million people. Because these two urban areas abut one another and are directly connected by a state highway, they are combined in the Federal Highway Urbanized area and are considered part of the same urban area.

Also note, the 2020 census population in the Snoqualmie Valley (Duvall, Carnation, North Bend, Snoqualmie, and unincorporated areas including Fall City) totals 57,117. This does not include areas such as Preston or parts of Sammamish and Redmond located along SR 202.

The City performed a traffic model analysis as part of the RJT request that demonstrates approximately 35 percent of traffic using the Parkway is pass through traffic. These vehicles serve the wider/rural King County community and do not originate or end within the city limits. PSRC noted in their email, “A review of the latest travel demand models used for the PSRC Regional Transportation Plan analysis completed in 2022 showed that about 35% of traffic on the Parkway in the base year model were from outside the City of Snoqualmie or “regional” in nature. This share of traffic increased to approximately 40% in future model years.” It is unreasonable for a small community such as Snoqualmie to carry the full financial burden of maintaining a regional roadway facility that benefits the larger urban areas.

2. Regarding the King County Four-to-One Program, based on the most recent GMPC meeting, September 27, 2023, a potential JPA/UGB boundary may not be considered. Thus, the statement about additional growth adding unanticipated challenges on the local, regional, and state transportation network are now unfounded. However, the letter dated August 18, 2023, from Mayor Ross in response to Robin Mayhew, WSDOT Deputy Regional Administrator’s letter dated July 12, 2023, addresses their concerns regarding Four-to-One Program using a potential JPA/UGB boundary. (Enclosure)
3. Mill Site Development:

In the letter, you indicated that the City completed the Environmental Impact Statement (EIS) for the Mill site without input from WSDOT. WSDOT was provided notice of initiation of the EIS scoping process on May 5, 2017, and of the opportunity to comment on the scope of work for the EIS traffic analysis of the full development plan for the Mill Site. WSDOT submitted a scoping comment letter on June 6, 2017, and those comments were addressed in the EIS traffic analysis. Traffic impacts for all phases of the development were fully evaluated in the Draft EIS (DEIS), and mitigation measures identified. In fact, Jeff Schramm, Transportation Consultant for TENW, testified<sup>2</sup> during the appeal of the EIS that the traffic analysis included scoping input received from WSDOT. Additionally, Mr. Schramm had several points of interaction prior (emails and meetings) in 2018 and 2019 with representatives from Jacobs – the WSDOT

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<sup>1</sup> Craig Helmann, PSRC Director of Data, email message to Paula Reeves, WSTC Senior Policy Analyst on July 18, 2023

<sup>2</sup> Exhibit A Hearing Examiner Findings, Conclusions and Decisions PCI 17-0001

transportation consultant on the I-90/SR 18/Snoqualmie Pkwy interchange – in which they shared land use and traffic information related to the Mill Site development.

The City provided notice to WSDOT at appropriate points during the SEPA process, including notices of availability of the Draft EIS (April 27, 2020), and the Final EIS (December 9, 2021). Notice of an extension of the EIS comment period was also provided. In addition, all notices were also published in the City’s newspaper of record and on the Department of Ecology SEPA Register. However, WSDOT did not submit any comments on the Draft EIS during the SEPA or decision-making processes. In addition, following completion of the EIS, the City provided all required public notices in association with the City Council’s consideration and approval of the Planned Commercial Industrial (PCI) Plan for the Mill Site project, which was done in a series of open public hearings and meetings before the Council. WSDOT had full opportunity to provide input during the City’s SEPA process and on the PCI Plan.

The EIS traffic analysis for the full buildout of Mill Site development includes land use information and traffic generation information for full buildout of the Mill Site and similar information for the different phases of buildout. Additional traffic analysis and mitigation were identified in the EIS for the different phases and full buildout. Mitigation for Phase 1 is minimal because the traffic analysis identified only one intersection that would not meet level of service (LOS) standards. Mitigation for Phases 2 and 3 with full buildout of the Mill Site was also identified in the EIS.

The EIS documented future operations at 23 study intersections and five site entrances at Phase 1 completion and at full build out. The EIS traffic analysis applied background growth, pipeline projects (approved but not yet on the road network) and known transportation improvement projects initiated by WSDOT and identified in the Snoqualmie 2023 – 2028 Capital Improvement Plan (CIP). The EIS determined that Phase 1 would not cause any of the study intersections to experience LOS below City acceptable standards. Full buildout of Phases 2 and 3 (anticipated over 15 years) would require additional mitigation, which the EIS identified including several traffic improvements on the Snoqualmie Parkway. Mitigation for full buildout of the Mill Site also includes requirements that the Mill Site owner update the traffic analysis to address potential traffic impacts arising from specific uses identified in Phases 2 and 3, and identify improvements needed to achieve an acceptable transportation LOS according to City standards. Specifically condition 40<sup>3</sup> mandates that the owner pay the proportionate share of the cost of numerous improvements to Snoqualmie Parkway and SR 202 including:

- *Replacement and expansion of the existing SR 202 bridge crossing the Snoqualmie River;*
- *Widening of the intersection of the haul road with Mill Pond Road and construction of a new roundabout;*
- *Widening of the single-lane roundabout intersection at Tokul Road SE / SR 202 / SE Mill Pond Road to allow two circulating lanes;*
- *Widening of SR 202 at the Snoqualmie Parkway intersection to provide one additional through lane in each direction; and*

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<sup>3</sup> Exhibit D, Staff Report to the Hearing Examiner 2017-0001/ SEPA 2017-0003

- *Installation of a roundabout at the SE 99th Street/Snoqualmie Parkway intersection to achieve acceptable LOS.*

The Mill Site development will be responsible for such mitigation actions to ensure adequate levels of service along the Snoqualmie Parkway which should not impact the RJT request. Development of the Mill Site project will assist the City with meeting our 2044 growth targets, which include 1,500<sup>4</sup> housing units and 4,425 jobs. It is a much-needed project considering the unexpected loss of the Salish Lodge expansion, PCI 18-0001 which began in 2001 and cancelled shortly after the City resolution approving the proposal in 2018.

It is important to note that the Mill Site project is not subject to the County's Four-to-one Program, which relates to changes to the Urban Growth Boundary. See King County Comprehensive Plan, Policy U-185. The Mill Site is already included in the City's UGA. See Snoqualmie Comprehensive Plan, Figure 2.1. The Mill Site project also does not involve changes to the Countywide Planning Policies.

In summary, we desire the successful operation of WSDOT investments, and we know the information provided here will assure you that WSDOT infrastructure will be safeguarded with the RJT. Lastly, thank you for being supportive on the city's issue of growth targets to be further addressed as part of the comprehensive planning process.

Sincerely,



Mayor Katherine Ross

Enclosure: WSDOT September 22, 2023, Letter  
Snoqualmie August 18, 2023, Letter  
WSDOT July 12, 2023, Letter with Attachment A  
Snoqualmie Gateway Village Preliminary Transportation Assessment

Cc: Washington State Transportation Commission

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<sup>4</sup> **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.



September 22, 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 provide comments to the King County Growth Management Planning Council (GMPC) throughout the process to update the Countywide Planning Policies (CPPs). In July 2023, WSDOT submitted a comment letter expressing our support for the use of the original 1994 UGA line for the county's Four-to-One UGA expansion program and opposed allowing exceptions to this for the City of Snoqualmie and the City of North Bend.

We are writing you again to provide additional information on several matters that relate to the anticipated outcome of the proposed CPP amendments for the Four-to-One Program, should the recommended exceptions be approved. We have serious concerns that these separate but interrelated decisions will result in significant, cumulative impacts on the operation of WSDOT facilities, including the performance of the new \$188 million SR-18/I-90 Interchange investment, and ultimately the users of the transportation system in the Snoqualmie Valley.

These concerns are summarized below and further reinforce our support for the county using only the original 1994 UGA line and in its Four-to-One UGA expansion program. We've also included additional information in response to several questions raised about the interchange assessment included in our previous letter and our request for consideration at your September 27<sup>th</sup> GMPC meeting.

#### City of Snoqualmie Route Jurisdiction Transfer (RJT) Request

The City of Snoqualmie has submitted a request for the Snoqualmie Parkway to be transferred to WSDOT. The request is currently under consideration by the Washington State Transportation Commission. WSDOT has testified that Snoqualmie Parkway does not meet any applicable criterion set forth in the statute. According to the city's data, an overwhelming number of passenger vehicle trips, along with two-thirds of truck trips had at least one trip end within city limits and served a purpose and benefit to the city.

WSDOT comments also included a statement of our concern with further development within Snoqualmie impacting the state highway system. For additional context, attached is the June 28 letter that WSDOT submitted to the Washington State Transportation Commission.

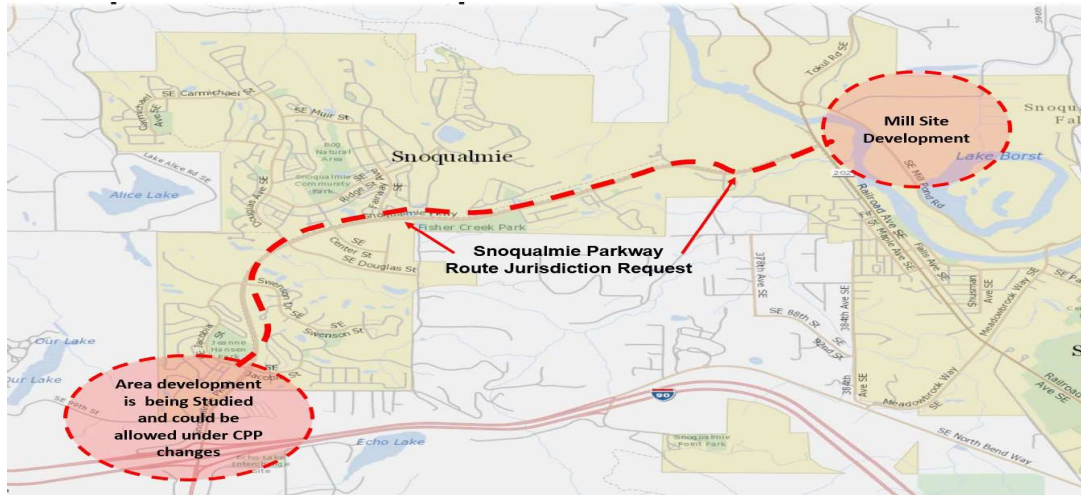
Should the Route Jurisdiction Transfer Request (RJT) be approved, WSDOT will be responsible for the traffic impacts on the Snoqualmie Parkway that result from development in and around the cities of Snoqualmie and North Bend, including any additional urban development which would be allowed under the proposed CPP changes for the Four-to-One Program. The Washington State Transportation Commission's recommendation to the Legislature is anticipated at its October 17/18 meeting.

#### City of Snoqualmie Mill Site Development

The City of Snoqualmie recently approved the Mill Site Development, a 261-acre site with 1.83 million sf of light industrial/manufacturing, warehouse, office, retail/restaurant, and residential uses. This development will have traffic impacts on SR-202 and the new SR-18/I-90 Interchange. WSDOT provided comment during the Environmental Impact Statement (EIS) scoping phase for the need to assess the development impact on the state highway system and expressed WSDOT's interest in reviewing the traffic impact analysis. Subsequently, the development of the EIS was completed without any input from WSDOT. To date, we have found no record that WSDOT was provided an opportunity to review and comment on the EIS, and we have no record of contact from the city on the subject, including in response to our initial scoping phase comments.

More recently, we were able to perform a preliminary review of the Mill Site EIS, along with evaluating potential trip generation of higher intensity urban development that would be allowed with the proposed Four-to-One policy amendments. This has increased our concerns regarding the proposed CPP changes. Based on this preliminary review, we have concerns that the Mill Site development EIS may have underestimated the combined development and background growth trips on SR202 and through the I-90/SR 18 interchange area. WSDOT is further troubled that if the Snoqualmie Parkway RJT is approved, the state is not only responsible for all the development-related impacts to existing highways, but also this new highway extension. The Mill Site EIS identifies several potential mitigation actions on Snoqualmie Parkway that WSDOT was not invited to review nor provide input and will be responsible for if the RJT request is approved.

Figure 1. Snoqualmie Valley Context Map



We also wanted to address several letters that have been submitted to GMPC in response to WSDOT’s July letter that question the development assumptions used to assess the impact that new urban development being studied would have on the new SR-18/I-90 Interchange. As specifically stated in our prior letter, we understand that the exact development that would be proposed and/or allowed in the interchange area is not certain. However, any higher intensity urban development up to and around the I-90/SR-18 Interchange and along I-90 has the potential to significantly degrade the safety and performance of the interchange area. There are numerous examples of the types of development that could be expected at similar locations (i.e., adjacent to freeways with convenient access from all directions). As we noted in our previous letter, the I-90/SR 18 Interchange Justification Report (IJR) did not anticipate additional development up to and around the interchange and assumed the areas would remain rural under the county’s zoning.

Furthermore, we maintain our concern that 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. In addition, 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.

WSDOT Request

WSDOT continues to support an approach to the Four-to-One program that uses only the 1994 UGA as the criteria and does not provide exceptions for select jurisdictions. 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 that state investments in transportation serve the users safely and efficiently as intended.

However, if GMPC is still considering allowing exceptions for the City of Snoqualmie and the City of North Bend, we ask that the action on this specific amendment to the CPPs be delayed until the next annual amendment cycle. This delay will allow WSDOT the time necessary to 1) determine whether the state will be responsible for the Snoqualmie Parkway through the route jurisdiction transfer process and 2) work with the city to collect additional information and conduct a more adequate review and analysis to fully understand what the combined impact on state facilities of the Mill Site development and potential additional development resulting from the expansion of the Four-to-One program will have on the state facilities within the Snoqualmie Valley.

This delay will also allow the City of Snoqualmie time to discuss its housing growth targets with King County further. As the city described in the attached response to WSDOT, it will be requesting an adjustment to its 2044 housing targets based on its ability to accommodate growth without annexing areas along the I-90/SR-18 interchange. WSDOT supports this issue being addressed in a comprehensive process and resolved before adopting policy exceptions in the CCPs.

Thank you for your consideration.

Sincerely,

*Brian D. Nielsen*

Brian D. Nielsen (Sep 22, 2023 12:49 PDT)

Brian Nielsen, PE  
Regional Administrator  
Northwest Region

Enclosures (2)

cc: Roger Millar, Secretary of Transportation  
Amy Scarton, Deputy Secretary of Transportation  
Julie Meredith, Assistant Secretary Urban Mobility and Access and Megaprograms  
Robin Mayhew, WSDOT Deputy Northwest Regional Administrator  
Mark Leth, WSDOT Assistant Regional Administrator – Traffic  
Steven Breaux, WSDOT Director of Legislative Relations  
Jeff Storrar, WSDOT Policy Manager





## Office of the Mayor

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**Katherine Ross**

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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 target<sup>1</sup>. 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 1,500<sup>2</sup> 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

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

<sup>2</sup> **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 18<sup>3</sup>.

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 acres<sup>4</sup> 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 Plan<sup>5</sup> 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

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

<sup>4</sup> 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'.

<sup>5</sup> 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 99<sup>th</sup> 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

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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 99<sup>th</sup> 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%

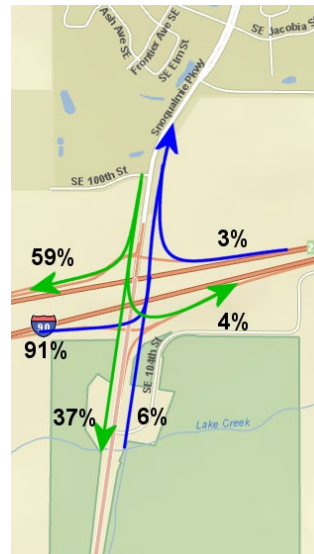
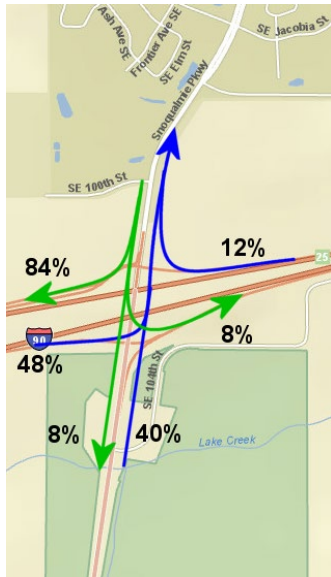
### PM Peak

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

<b>Date:</b>	August 11, 2023	<b>TG:</b>	1.23255.00
<b>To:</b>	Growth Management Planning Council (GMPC)		
<b>From:</b>	Michael Swenson, PE, PTOE & Bornha Khedri		
<b>cc:</b>	Ivana Halvorsen, Barghausen		
<b>Subject:</b>	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 Addendum<sup>1</sup>. The project trip distribution and net new trip assignment are shown in Figure 2.

<sup>1</sup> 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 forecasts<sup>2</sup> 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.

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

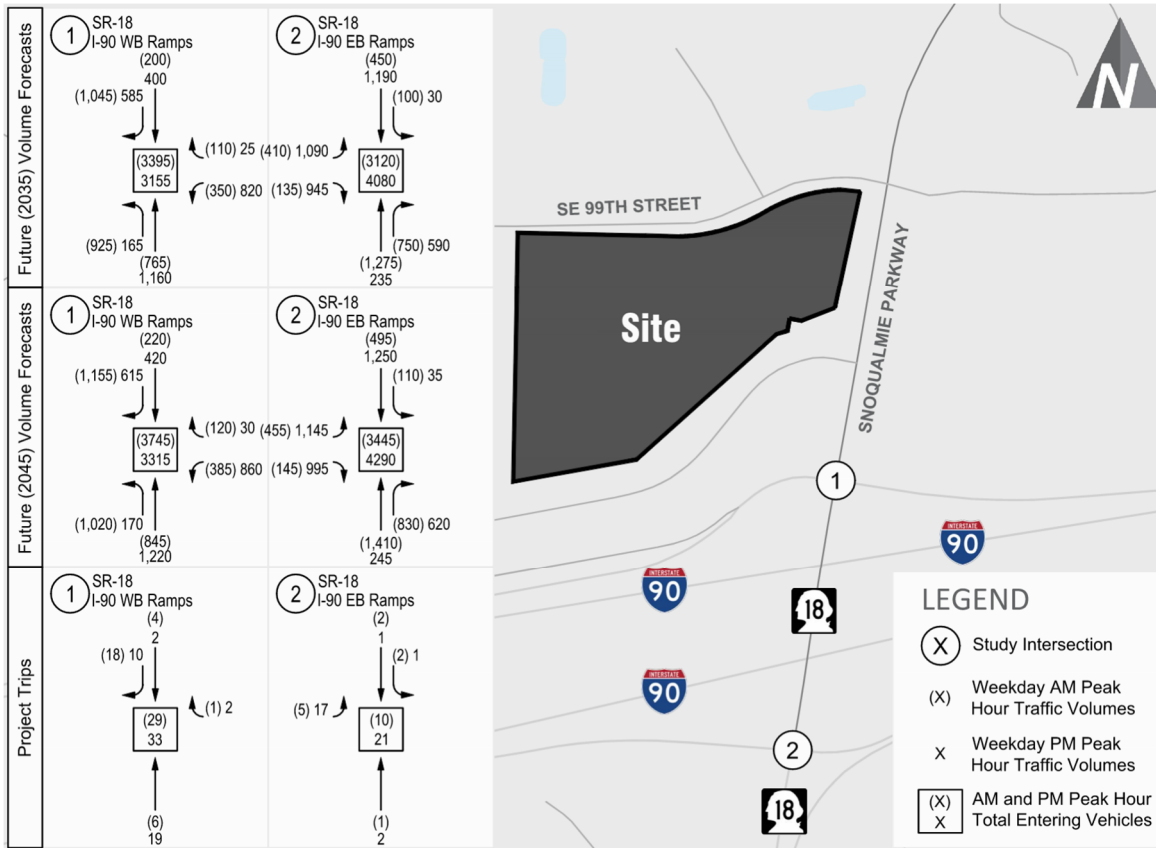


Figure 3: Weekday AM and PM Peak Hour 2035 and 2045 volumes forecasts and project trips

## 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
<b>AM Peak Hour</b>						
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%
<b>PM Peak Hour</b>						
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”*<sup>3</sup>.

## 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.

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

## Attachment A: Trip Generation Calculations

1.23255.00 - Snoqualmie Gateway Village

<b><u>Proposed Use</u></b>										
								<b>Total Net New</b>		
<b>Land Use</b>	<b>Setting</b>	<b>Size</b>	<b>Units</b>	<b>Model</b>	<b>Equation</b>	<b>Rate</b>	<b>Inbound %</b>	<b>Inbound</b>	<b>Outbound</b>	<b>Total</b>
<b>Multifamily (Low-Rise) (LU 220)</b>		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
<b><u>Subtotal</u></b>										
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**

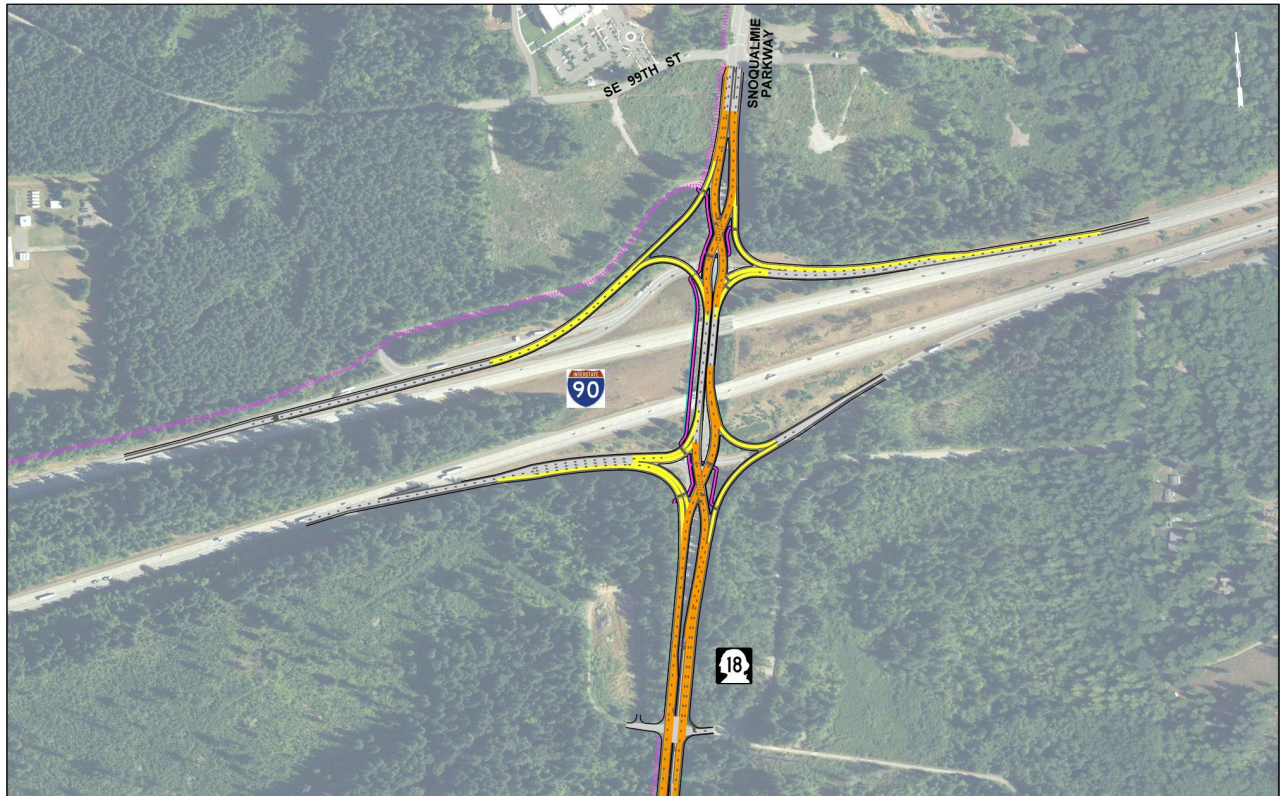
**Request for Proposal**

**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



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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
<b>Total</b>		<b>5,675</b>	<b>5,990</b>	<b>6,095</b>	<b>6,975</b>	<b>7,525</b>
Growth (%) <sup>a</sup>		-	5.6%	7.4%	22.9%	32.6%
Growth (%) per Year		-	0.8%	1.0%	0.8%	1.1%

<sup>a</sup> 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
<b>Total</b>		<b>7,125</b>	<b>7,390</b>	<b>7,530</b>	<b>8,260</b>	<b>8,870</b>
Growth (%) <sup>a</sup>		-	3.7%	5.7%	15.9%	24.5%
Growth (%) per Year		-	0.5%	0.8%	0.5%	0.8%

<sup>a</sup> 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
<b>Total</b>		<b>7,820</b>	<b>8,055</b>	<b>8,245</b>	<b>8,900</b>	<b>9,470</b>
Growth (%) <sup>a</sup>		-	3.0%	5.4%	13.8%	21.1%
Growth (%) per Year		-	0.4%	0.8%	0.5%	0.7%

<sup>a</sup> 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 <sup>a</sup>	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

<sup>a</sup> 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

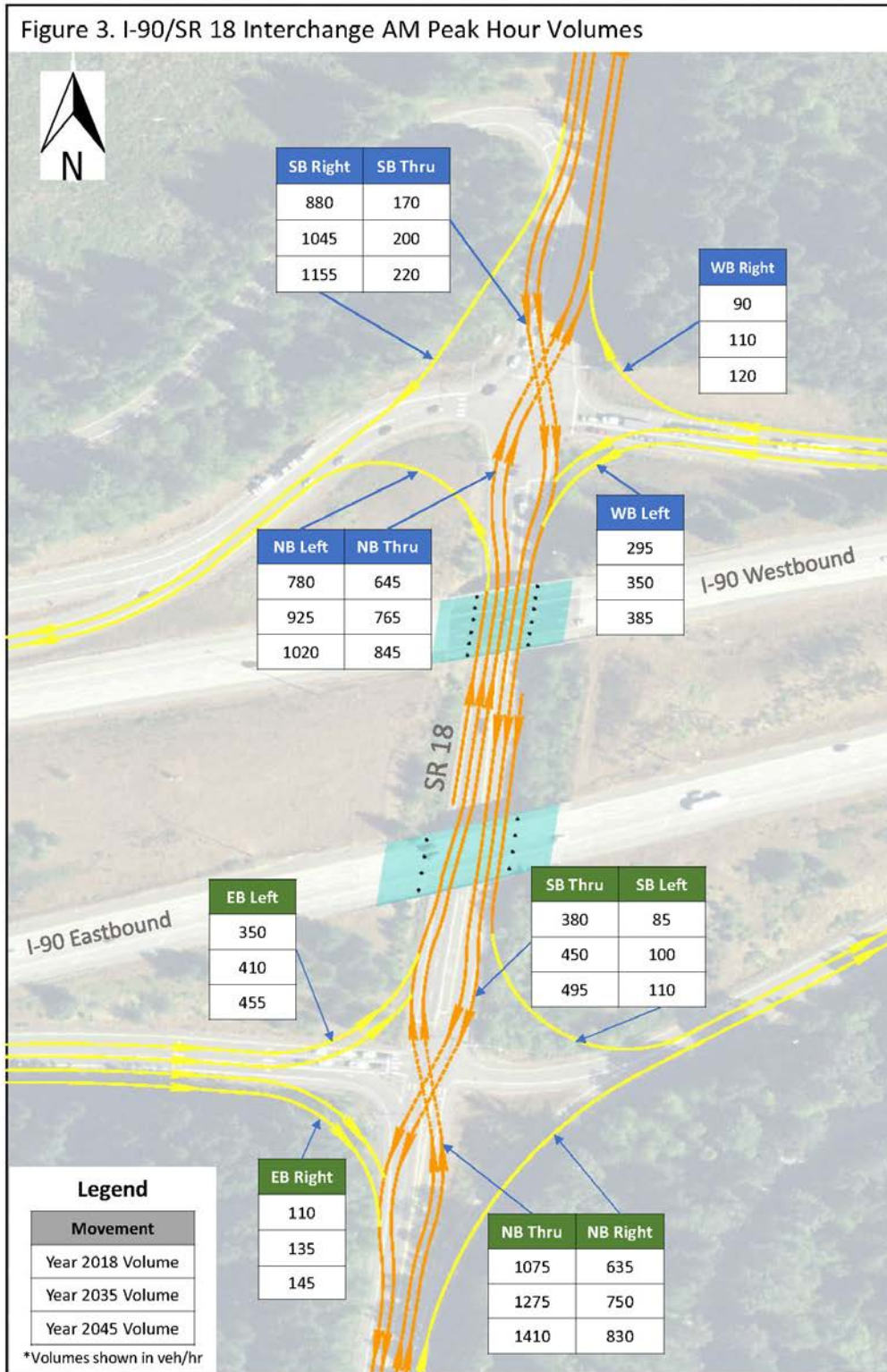




Figure 4. I-90/SR 18 Interchange PM Peak Hour Volumes

