

Scott Greenberg

From: Jeff Bender <jeffdbender@gmail.com>
Sent: Monday, August 22, 2016 2:29 PM
To: Scott Greenberg
Cc: Ali Spietz; Kari Sand
Subject: SEPA Determination for Proposed MICA Project - Comment Letter

Hi Scott,

Thank you for the opportunity to comment on the request for a State Environmental Policy Act (SEPA) environmental determination for the proposed Mercer Island Center for the Arts.

I have reviewed the MICA SEPA documents you sent me on August 10, specifically Attachment G: the MICA parking management plan (PMP) and the transportation impact analysis (TIA). Based on my review and information in documents pertaining to the City of Mercer Island's Comprehensive Plan update and Sound Transit's East Link Final Environmental Impact Statement (EIS), it is clear that the City's, i.e. Transpo Group's, initial evaluation of the proposed MICA project for probable significant adverse environmental impacts is deeply flawed. I recommend that the City require an environmental impact statement be completed for the project to achieve a complete and accurate environmental assessment with more opportunity for public review and comment.

The MICA TIA:

- 1) omits key congested intersections that will be affected by traffic generated by MICA and
- 2) fails to include the presence of Sound Transit's East Link project during its future condition year of 2019.

The MICA TIA must include the following intersections in its Level-of-Service (LOS) analysis to identify probable significant adverse impacts of the MICA project:

- North Mercer Way and 77th Avenue SE
- SE 27th Street and 80th Avenue SE

Both the Sound Transit East Link FEIS and recent traffic analysis done for the Mercer Island Comprehensive Plan update identify these two intersections as critical intersections that are forecasted to fail in the near future.

In addition, the TIA intersection LOS analysis should evaluate the intersection of SE 28th Avenue and 80th Avenue SE. It is identified in the City's traffic analysis as having the potential for failure; it could also be adversely impacted by MICA-generated traffic.

The TIA uses a 2019 horizon for analyzing MICA's future traffic impacts. The TIA was done as if Sound Transit's Link project did not exist. In 2019, I-90/East Link will be under construction affecting Mercer Island streets and Mercer Island access to I-90's high occupancy vehicle lanes. By 2021, East Link will be operating with supporting changes to Mercer Island's street network in the I-90 corridor and Town Center area. There is absolutely no mention of this activity and the probable significant adverse impact from MICA generated traffic while the activity is occurring and once it is completed.

Finally, I would like to comment on the PMP. First, I would like to know what two days the on-street parking study was done. MIHS was on spring break the week of April 11-15. I would also like to note that the New Seasons grocery store is opening this fall near streets surveyed for on-street parking. This development will immediately impact the on-street parking supply that MICA is planning to use.

Commuter (including RPZ) parking continues to consume on-street space supply in the Town Center area as demand for transit service at the Mercer Island park-and-ride lot service grows and park-and-ride lot demand is over capacity.

On-street parking should not be assumed as part of the MICA parking supply. The MICA project needs to have a Transportation Management Plan (TMP) to get MICA users to its facility in modes other than SOV, e.g. walk, bike, shuttle service, etc. Please require MICA to have a TMP that includes multiple strategies to reduce SOV use.

Regarding off-street parking, if MICA is allowed to meet its parking demand by sharing off-street parking with other developments, they must have at least a 30 year agreement guaranteeing the off-street parking spaces. If this guarantee cannot be provided (in advance of permitting), MICA needs to build its own off-street parking supply. Parking supply (on and off street) will only get tighter in the Town Center and

surrounding streets to meet future MICA parking demand. It is also likely that the MICA facility will be rented to other groups when not in use. If so, the PMP claim that the high activity scenario is expected to occur only 2 times a year is either misleading or false.

Thanks again for the opportunity to comment.

Jeff Bender

2438 71st Avenue SE

Mercer Island, WA 98040