



July 14, 2020

City of Marysville, Dept. of Community Development  
Attn: Cheryl Dungan  
80 Columbia Ave  
Marysville, WA 98270

**Subject: Ray Townhomes (PA20-007) Concurrency Disagreement  
PACE Project No. 415-001**

Dear Cheryl:

This letter is in response to the concurrency letter sent by the department of public works dated July 6, 2020. We disagree with the findings in the letter, specifically with the interpretation of the number of trips generated by multifamily residential units, which is defined as any units that consist of 3 or more attached units.

The definition for "Townhouse" under 22A.020.210 identifies "a single-family dwelling unit constructed in a row of at least three such units..." Under 22A.020.200 the definition for "single-family attached dwelling unit" includes language about units being on lots and applying to townhouses.

I think staff has used this link to say a unit on its own lot (regardless of how many units it is attached to) is treated like units that are not connected (i.e. standard single-family units).

The ITE trip generation data for ITE Land Use Code 220 – Multifamily Detached Housing (Low-Rise) does not differentiate between units that are on lots vs. not on lots. This land use code states that trip counts generated from multifamily units are 40% lower than the standard rate for typical single-family units. This is not how the Administrative Decision sent by your DPW has interpreted this code section, which we disagree with. This code section is attached for convenience.

How would a traffic count, or the number of cars from a multifamily building, care if it were or were not on a lot, specific to the number of trips generated from this unit?

I want you to issue SEPA with this issue that needs to be decided by the hearing examiner.

Please feel free to call with any questions or if I can provide anything further to assist with further review and approval.

Thank you,

PACE Engineers, Inc.

Andy Reaves, PE  
Senior Principal Engineer

# Land Use: 220

## Multifamily Housing (Low-Rise)

### Description

Low-rise multifamily housing includes apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have one or two levels (floors). Multifamily housing (mid-rise) (Land Use 221), multifamily housing (high-rise) (Land Use 222), and off-campus student apartment (Land Use 225) are related land uses.

### Additional Data

In prior editions of *Trip Generation Manual*, the low-rise multifamily housing sites were further divided into rental and condominium categories. An investigation of vehicle trip data found no clear differences in trip making patterns between the rental and condominium sites within the ITE database. As more data are compiled for future editions, this land use classification can be reinvestigated.

For the three sites for which both the number of residents and the number of occupied dwelling units were available, there were an average of 2.72 residents per occupied dwelling unit.

For the two sites for which the numbers of both total dwelling units and occupied dwelling units were available, an average of 96.2 percent of the total dwelling units were occupied.

This land use included data from a wide variety of units with different sizes, price ranges, locations, and ages. Consequently, there was a wide variation in trips generated within this category. Other factors, such as geographic location and type of adjacent and nearby development, may also have had an effect on the site trip generation.

Time-of-day distribution data for this land use are presented in Appendix A. For the 10 general urban/suburban sites with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 7:15 and 8:15 a.m. and 4:45 and 5:45 p.m., respectively. For the one site with Saturday data, the overall highest vehicle volume was counted between 9:45 and 10:45 a.m. For the one site with Sunday data, the overall highest vehicle volume was counted between 11:45 a.m. and 12:45 p.m.

For the one dense multi-use urban site with 24-hour count data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 7:00 and 8:00 a.m. and 6:15 and 7:15 p.m., respectively.

For the three sites for which data were provided for both occupied dwelling units and residents, there was an average of 2.72 residents per occupied dwelling unit.

The average numbers of person trips per vehicle trip at the five general urban/suburban sites at which both person trip and vehicle trip data were collected were as follows:

- 1.13 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 7 and 9 a.m.
- 1.21 during Weekday, Peak Hour of Adjacent Street Traffic, one hour between 4 and 6 p.m.

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in British Columbia (CAN), California, District of Columbia, Florida, Georgia, Illinois, Indiana, Maine, Maryland, Minnesota, New Jersey, New York, Ontario, Oregon, Pennsylvania, South Dakota, Tennessee, Texas, Utah, Virginia, and Washington.

***It is expected that the number of bedrooms and number of residents are likely correlated to the number of trips generated by a residential site. Many of the studies included in this land use did not indicate the total number of bedrooms. To assist in the future analysis of this land use, it is important that this information be collected and included in trip generation data submissions.***

### **Source Numbers**

168, 187, 188, 204, 211, 300, 305, 306, 319, 320, 321, 357, 390, 412, 418, 525, 530, 571, 579, 583, 864, 868, 869, 870, 896, 903, 918, 946, 947, 948, 951



**MARYSVILLE**  
**PUBLIC WORKS**

July 6, 2020

Custom Comfort Homes, LLC  
Scott Ray  
8324 59<sup>th</sup> Ave NE  
Marysville, WA 98270

Re: Ray Townhomes – *Concurrency Recommendation*  
PA20007

Dear Scott,

Custom Comfort Homes, LLC is proposing creation of twenty-three (23) fee simple lots to allow construction of 19 new single-family attached townhomes, 1 duplex and retention of 2 existing homes. According to the Traffic Impact Analysis (TIA), prepared by Gibson Traffic Consultants, dated August 2019; revised April 2020; the traffic studies incorrectly provide trip generation based on a multi-family development and not single-family units. Pursuant to the Administrative Decision issued by the City Engineer, attached housing, duplex, single-family detached, single-family attached and townhouse development shall generate 1.0 PM Peak Hour Trips (PMPHT) per unit. Based on this Administrative Decision the development would generate the following Average Daily Trips (ADT), AM peak hour trips (AMPHT) and PMPHT:

Land Use Code	Units	ADT	AMPHT	PMPHT
LUC 210 Single-Family Detached Housing	21	198	16	21

Based on our review of existing conditions, as well as other applicable supplemental information submitted with the application, and on file with the City, the following impacts and mitigation obligations are recommended for Ray Townhomes:

1. In order to mitigate impacts upon the future capacity of the road system, the applicant shall be required to submit payment to the City of Marysville, on a proportionate share cost of the future capacity improvements as set forth in MMC 22D.030.070(3), for the development. Traffic impact fees shall be vested at a rate of \$6,300 per PMPHT.
2. The applicant shall be required to dedicate public right-of-way in order to accommodate the required frontage improvements along 55<sup>th</sup> Ave NE and the internal plat road in accordance with MMC 12.02A.110(1)(c), *Dedication of Road right-of-way – Required setbacks*. Right-of-way widths and required dedication shall be determined by the City Engineer.
3. Pursuant to MMC 12.02A.090, *Frontage improvements required*, the applicant shall be required to construct frontage improvements along 55<sup>th</sup> Avenue NE and the internal plat road per Engineering Design and Development Standards (EDDS), prior to final subdivision approval. Roadway improvements, channelization, street lighting and site access plans shall be required to be reviewed and approved by the City Engineer, prior to construction plan approval.

Marysville Municipal Code (MMC) 22D.030.070(1)(d), requires an applicant to make a written proposal for mitigation of a development’s traffic impacts to the Public Works Director, prior to finalizing a concurrency determination and conditions of approval. If you have any questions, regarding the developments impacts and recommended

(360) 363-8100

Public Works  
80 Columbia Avenue  
Marysville, WA 98270

mitigation obligations outlined above, please contact Cheryl Dungan, Senior Planner, at [cdungan@marysvillewa.gov](mailto:cdungan@marysvillewa.gov) or by phone at 360.363.8206.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Laycock".

Jeff Laycock  
City Engineer


cc: Jeffrey Thomas, CD Director  
Kevin Nielsen, Public Works Director  
Jesse Hannahs, Traffic Engineer  
Chris Holland, Planning Manager



**MARYSVILLE**  
PUBLIC WORKS

## MEMORANDUM

TO: Engineering Administrative Decision

FROM: Jeff Laycock, City Engineer 

DATE: June 16, 2020

SUBJECT: Traffic Impact Analysis Trip Generation for Developments

It is the Public Works Department – Engineering Division’s Administrative Decision to utilize the most current edition of the Institute of Transportation Engineers (ITE) – Trip Generation Manual and associated handbooks and guides to establish trip generation rates for land development projects.

In addition, the following shall provide further guidance and clarity to utilization and interpretation of ITE:

1. Trip Generation shall be based upon “average rate” for “peak hour of adjacent street traffic”.
2. Diverted Link trips shall NOT be allowed.
3. Pass-by trip rates shall be allowed only based upon rates in the latest version of the ITE Trip Generation Manual,
  - a. except the following which have been established by Snohomish County ILA:
    - i. Drive thru Only Espresso Stand = 100%
    - ii. Daycare (located on Arterials only) = 75%
    - iii. Specialty Retail = 25%
    - iv. Health Club = 54%
    - v. Drive-in Bank = 47%
  - b. And as adopted by the City prior to 2013 as follows:
    - i. Automobile Sales = 25%
4. Multi-use Developments shall be reviewed based upon Chapter 7 of the ITE Trip Generation Handbook.
5. Internal capture may only be utilized for:
  - a. Development projects of more than 100,000 square footage of total floor space constructed at one time by a single owner conforming to criteria cited in ITE for multiple, differing land uses with applicable internal capture rates.
  - b. Development projects within mixed-use zoning areas with multiple use types.
6. The following residential units per MMC Chapter 22A.020 definition shall generate 1.0 PM Peak Hour trips per unit:
  - a. Accessory dwelling units;

(360) 363-8100

Public Works  
80 Columbia Avenue  
Marysville, WA 98270

- b. Attached housing;
  - c. Duplex;
  - d. Single-family, detached;
  - e. single-family attached; and
  - f. Townhouse.
7. For Hotel Type developments, Business Hotel may only be utilized for proposals consistent with the ITE description for Business Hotel and use shall require:
- a. Occupancy rate study shall be performed consisting of:
    - i. Four (4) similar style hotels within Marysville or surrounding vicinity within the I-5 corridor of central/northern Snohomish County.
    - ii. At least two (2) of study locations must be located within City of Marysville or Tulalip Tribes jurisdictional boundaries.
8. For land uses not listed in the ITE Trip Generation Manual, the following shall be required:
- a. Trip generation study to include at least three (3) sites of similar type/style development in similar regions/locations.
  - b. Comparison sites must be reviewed and approved by City staff.
9. A development project that relocates from an existing building to a new building shall not receive traffic mitigation credits if the existing building is not demolished or removed.
- a. Credits shall be based upon the latest version of the ITE Trip Generation Manual for the demolished or removed building.
10. If a development project is assessed for a portion of a Local improvement District (LID) that constructs a project for which traffic mitigation fees are based upon, the payment of fees may be credited toward the development's traffic mitigation fees.
11. Development project proposals, in which phased development or contiguous parcel ownership are proposed or present, shall include the entire project and/or all contiguously owned parcels within the trip generation for the development project.
- a. If only a portion of the subject property is proposed for development, trip generation shall include full buildout of the remainder of the property under current zoning.
  - b. Or, if the proposal involves a zoning change, buildout under the proposed zoning.