

March 25, 2024

Mr. David Ginther
City of Olympia
Community Planning and Development
601 4th Avenue East, PO Box 1967
Olympia WA 98507-1967
Sent via email to: dginther@ci.olympia.wa.us

Dear Mr. Ginther:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review the City of Olympia's (City) Capital Mall Triangle Subarea Plan (Subarea Plan) and Planned Action Final Environmental Impact Statement (FEIS). WSDOT appreciates the City's consideration of WSDOT's comment letter in response to the Draft Environmental Impact Statement (DEIS). Nonetheless, WSDOT remains concerned that the FEIS does not fully address our prior comments related to the scope of the DEIS transportation analysis and the proposed trip cap. WSDOT requests that the City defer any action to certify the FEIS or adopt the Subarea Plan until the items noted in this letter are fully resolved.

CAPITAL MALL TRIANGLE SUBAREA PLAN

The City of Olympia Comprehensive Plan (Plan) describes the vision for the Capital Mall Triangle Subarea as a regional shopping center, which includes various types of jobs within walking distance of medium-density housing. The vision is for a "...complete urban neighborhood with a mix of jobs, housing, and services." WSDOT fully supports the City's vision for a job-housing balance and walkable/rollable urban neighborhood.

Transportation goals in the Subarea Plan include safe, efficient, multimodal mobility; convenient and reliable transit; and better-connected street pattern. Also, objectives around active transportation, multimodal, transit, climate and resiliency align well with WSDOT priorities.

While WSDOT supports the City on the above-mentioned vision, goals and policies in the Subarea Plan, there are certain key elements to improve upon to better understand and mitigate the proposed action's probable significant impacts to the state highway system.

PLANNED ACTION FINAL ENVIRONMENTAL IMPACT STATEMENT

Transportation Network Assumptions

FEIS Table 4-5 (FEIS, page 4-30) lists the transportation network improvement assumptions for each alternative. The FEIS (page 4-12) states funding for the US 101/West Olympia Access Project design and right-of-way acquisition is programmed after 2029, and there is no identified construction funding. The lack of identified construction funding for this project and other potential transportation improvements makes these assumptions speculative in nature. WSDOT believes it is inappropriate to make speculative assumptions when assessing transportation impacts.

Transportation Impacts

The potential transportation impacts of all Action Alternatives (Alternatives 2, 3, and the Preferred Alternative) are measured by the City against the expected conditions of Alternative 1 (FEIS, page 4-27). The FEIS states (page 4-28), "...any increase in trip generation over the Alternative 1 condition would be identified as a significant impact, as this would represent an increase in congestion when compared to Alternative 1." The City's rationale for this approach is stated in the DEIS (Page 4-27) as "[s]ince the City does not have any mechanisms to stop or amend development allowed under the current zoning, the trip generation and traffic congestion that could occur under Alternative 1 is an important baseline by which to compare the impacts of Alternatives 2 and 3."

WSDOT disagrees with this rationale and impact analysis approach. WSDOT notes that while zoning compliance is necessary for new development, zoning compliance, in and of itself, is not sufficient for development to proceed. For example, new development proposals need to comply with GMA concurrency requirements and multiple City review and approval processes (which may include a project-specific transportation impact assessment) prior to receiving approval. In fact, the City has multiple "mechanisms to stop or amend development" that does not comply with legal and administrative requirements even if the development is consistent with approved zoning.

Vehicle Trip Cap

WSDOT requests modifications to the proposed trip cap to help meet the City's goals for shorter trips and mode shift as desired by the City's Transportation Master Plan and to reduce level of performance degradation on WSDOT facilities below adopted standards. Rather than all mitigations being tied to triggered SEPA actions for the 'last developer(s) on the block,' a more deliberate and tiered trip cap structure should be used.

The Capital Mall Triangle Subarea will continue to be a regional draw for trips outside of the area within the trip caps in the FEIS. Even a portion of those allowable trips under current zoning have the potential to degrade the performance of WSDOT facilities. A tiered trip cap can be structured in several ways. WSDOT proposes the following structure (rates and thresholds are subject to further analysis and change).

Internal Trip Cap

Trip caps internal to the subarea itself can be retained as discussed in the FEIS. However, when redevelopment triggers these thresholds, the City's capital projects must be complete prior to further development. There must be a connection between allowed developments and programmed/funded capital projects and mitigating strategies. No significant modeling has been performed to align levels of development with the requisite level of future funded capital investments. WSDOT requests, projects without committed construction funding be excluded when assessing transportation impacts.

This internal trip cap may be similar to the trip cap mentioned in the FEIS document, but there remains significant uncertainty in how closely the methodologies will track with actual outcomes. For example:

- Are desired travel patterns shifting?
- Are novel trip generation and trip capture rates calibrated with pre-COVID data valid in a post-COVID environment?
- How are work-from-home and school/college enrollment trends solidifying?

The current trip cap internal to the subarea represents a three-quarters increase over what represents market conditions in the allowable zoning. This is a significant increase in traffic even after the internal trips subtracted via the MXD methodology. Therefore, we propose the additional trip cap, described below to separately monitor and track the regional trips.

External Trip Cap

Trip cap at cordon line(s) external to the subarea (at least at the control count locations in the City's annual data collection – namely the Black Lake control point) is necessary for all regional partners to incentivize shorter trips and simultaneously plan for appropriate mitigations to WSDOT facilities. When data indicates a certain volume at the Black Lake control point, then no further subarea development can occur until the interchange project is funded and underway. This volume threshold can be based on either new analysis or analysis done related to the 2016 Interchange Justification Report (IJR) work.

Unless further analysis is performed, a 10% increase in peak hour volumes conservatively triggers the need for mitigations either within the City of Olympia (Transportation Demand Management and Transportation System Management & Operations strategies, increased connections in the city street network – both inside and outside the subarea to distribute trips to alleviating routes, enhanced bus services, etc.) or the funding and construction of interchange improvements.

This approach is more appropriate to incentivize the City and its partners to implement the most cost-effective ways to achieve the densified land use and higher levels of development and activity within West Olympia while maintaining a safe and resilient transportation system. WSDOT is happy to meet with the City to discuss and resolve the above-mentioned critical issues moving forward. We believe aligning our shared goals will result in successful outcomes.

Mr. David Ginther

March 25, 2024

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Thank you again for the opportunity to engage in the planning process and review of the Subarea Plan and FEIS. We look forward to successful resolution of these outstanding issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Mazur".

George Mazur, P.E.

WSDOT Olympic Region Multimodal Planning Manager

GM:na

cc: Andrew Larson, WSDOT Olympic Region Development Services
Teri Chang, WSDOT Multimodal Planning and Data Division

From: Kuba Bednarek <bednarej@gmail.com>
Sent: Sunday, March 24, 2024 1:47 PM
To: David Ginther
Subject: Triangle Comments

I'm emailing in full support of alternative four which would increase building heights to 12 stories and add significant additional housing and mixed zoning. I think this is a great strategy to meet the demand for housing in our area. I believe any future commercial development in the Capitol Mall triangle should include as many levels of residency as possible on top of it. There is no other way to meet the demand for housing. We must build up and not sprawl out! If they don't want it on the west side, build it on the Eastside, please. Please also include some space for a natural area park, or square for people to gather.

Thanks for such a great planning vision. I hope there are more in the city who support it.

Kindly,
Jakub Bednarek
Eastside Olympia

From: smahlum@proton.me
Sent: Sunday, March 24, 2024 2:50 PM
To: David Ginther
Subject: Capital mall plans

Please can you just build more affordable housing we have so many homeless people in this state. OMG we need more housing please affordable housing.

Sent from [Proton Mail](#) for iOS

From: Yujin Ghim <ghim.yujin@gmail.com>
Sent: Sunday, March 24, 2024 8:20 PM
To: Capital Mall Triangle Plan
Subject: Capital Mall Triangle Input

Hello,

I know there is a meeting on April 1st, but I cannot attend. I would like to voice my input for the capital mall triangle. I believe option 3 would be the best to alleviate the housing issue in Thurston county.

Thank You for Your Time,

Yujin

From: Gary Wiles <wilesharkey@yahoo.com>
Sent: Monday, March 25, 2024 1:42 PM
To: Capital Mall Triangle Plan
Subject: comment on park planning for the Capitol Mall Triangle

Dear Mr. Ginther,

I attended the city's open-house on the Capitol Mall Triangle development project on March 7 and thought it was very informative. I'd like to submit a public comment for your planning process that pertains to the inclusion of a new city park to be built within the Triangle. I spoke with your parks representative who was present that evening and was told that the city would eventually try to establish a park 2-3 acres in size in the Triangle. I like this idea a lot, but based on the Triangle's large size, the several thousand people who are eventually expected to live within it, and the high-density of residents being planned, I suggest creating a larger park of at least 5 or more acres in size without having any athletic facilities added in (these already exist in nearby parks). A large park with lots of trees, shade, benches, etc would become a desired destination for Triangle residents to enjoy, especially during our increasingly hotter summers as climate change worsens, and more generally would be something the city could be proud of as it progresses with its future high-density development plans. I've seen city parks like this in large cities in the East and they are very popular with people who want go outside without having to drive anywhere. This would therefore fit right in with the city's goal to make the Triangle more pedestrian and bicycle friendly. Thus, my suggestion is to think big, not small, when planning for this park. Thanks for listening to my comment.

Regards,
Gary Wiles
521 Rogers St SW
Olympia

From: e norton <octaviavision19@outlook.com>
Sent: Monday, April 1, 2024 4:59 PM
To: David Ginther
Subject: Capital mall subarea plan comment

Somewhere in here must be a plan to deal with the existing homeless population. The current situation of begging on sidewalks, intersections and streetcorners, and squatting in the nooks and crannies surrounding the mall, and doing hard drugs in parking lots and landscaped areas is bad for them and bad for us, their neighbors.

Please create a preliminary plan to house and provide services to these guys before any groundbreaking ceremonies take place. Learn from the downtown Olympia experience. Prioritize solving this problem over making money.

Thankyou.

Betsy Norton

1405 evergreen park dr sw,.olympia 98502

Sent from my Verizon, Samsung Galaxy smartphone

Get [Outlook for Android](#)



Wig Properties LLC

4811 – 134th Place Southeast; Bellevue, Washington 98006 • Office: (425) 641-2044 • Fax: (425) 865-8648

April 1, 2024

Planning Commission
City of Olympia

Thank you for the opportunity to comment on the Capital Mall Triangle Subarea Final EIS. We own the property located at the southwest-corner of Harrison Avenue and Cooper Point Road with MOD Pizza, Ace Hardware, and Goodwill. Overall, we support both the EIS and the Olympia Capital Mall Triangle Subarea Plan and would submit the following two comments for the Planning Commission's consideration:

1. On page 3-75 (and elsewhere in your Design Standards) of the final Environmental Impact Statement, it is noted that projects go through the Design Review Board or staff review depending whether they are over or under 5,000 square feet, respectively, however, regardless of square footage, standards require "a continuous row of storefronts, stoops porches, or distinctive entryways facing streets" and "surface parking location and design." **This should be clarified that (a) existing buildings' main entrances simply need to face toward the street, not necessarily be located on the street, and/or (b) allow existing structures (pre-2024) to reuse, repurpose, re-tenant, and even expand existing structures, without needing to add storefronts along the street nor requiring buildings to be located between the street and the parking fields.**

We recommend requiring the creation of a street edge that is continuous and close to the street only upon full redevelopment of these sites (and perhaps only for residential-only buildings as recommended by the Subarea Plan).

We are strongly opposed to any requirement that projects would need to create a street edge that is continuous and close to the street other than upon full redevelopment, as allowances need to be made for repair/reconstruction of existing structures. Otherwise, this could prevent positive, incremental changes from occurring for many years, and potentially decades, in the interim.

For example, if a desirable business wanted to locate in an existing building in the HDC zones, but to accommodate that business's needs, the building footprint had to be adjusted by more than 5,000 square feet, this could inadvertently drive that business away from the property by requiring that their whole building be located on the street edge, which may not be appropriate if the entire site was not redeveloping at once. If this requirement had such an effect, it would lead the property to have more vacancy, which could in turn lead to additional public safety issues, and a less activated pedestrian realm. This could also have the unintended effect of driving investment away from the City of Olympia.

2. **We would like to voice our strong support for, and encourage the building and façade improvement program that was recommended as ED-4 in the September 28, 2023 draft Olympia Capital Mall Triangle Subarea plan.** The City recommended looking at models in other cities in order to craft a program appropriate for Olympia. This could have the most meaningful near-term effect in beautifying the City. If cash-grants are deemed unlawful due to the "gift of public funds", an alternative option would be a credit against permitting and traffic impact fees, or even allowing owners to bank the credits toward future development costs otherwise payable to the City.

Thank you for the opportunity to comment. We are excited by the City's and community's vision ahead and thank you for your hard work on this important matter.

Warm regards,

Leshya Wig
Wig Properties LLC-CV

Comments on the Draft Capital Mall Subarea Plan,
dated March 7, 2024

Philip W. Schulte

April 1, 2024

I. Objectives and Actions For This Subarea Plan

The main purpose of this subarea plan was “help the Capital Mall Triangle achieve the high-density, walkable, mixed-use urban neighborhood”. Individual objectives are established for climate and equity (3), land use and development (4), housing (6), transportation (10), urban design and community livability (4) and climate and environment (6). Each of these 33 objectives are worthy of further discussion.

In addition, there are 78 individual actions proposed in Table 9-1 (see Pages 93-102) of this subarea plan. Commentary on all of these objectives and actions would take many pages and cannot be summarized in a three minute address. Therefore, I have submitted written comments to address only a few of the areas which need further review and consideration before this plan should be submitted to the city for final action.

II. Some Important Missing Pieces of the Puzzle

A. The Future for The Harrison Avenue Corridor

The draft subarea plan Recommendations ED-6 and T-5 (pages 52 and 73, respectively) includes the recommendation that the city “Work with businesses along the Harrison Avenue corridor to further develop the vision for the area, understand displacement risks, and connect businesses to resources for securing land and buildings.” There would also be a “Harrison Avenue corridor study to use Intercity Transit’s Prop 1 funds for high frequency bus service and signal prioritization, with the planning stage beginning in approximately 2026.”

The Harrison-4th Ave. corridor between Kenyon St. and Black Lake Blvd. is a key area for mixed use and mid-rise or high-rise residential development. Leaving it undefined is a major gap in the planning. If there is limited change in this area, it is difficult to see how adding 2,749 new housing units to the Capital Mall Triangle is even feasible at all.

B. The Future For The Intercity Transit Hub and Transportation Investments

1. Transit HUB and Bus Service

Increasing the density in the Kenyon St. area to the level indicated in the subarea plan requires a through transportation plan to accommodate additional businesses and housing units. Transportation Goal h (page 28) is “To move or upgrade the transit hub and provide a direct bus route to the mall transit hub”.

However, Transportation Recommendation No. T-6 (Transit Hub Location: page 73) indicates that Intercity Transit plans to focus on high frequency bus service in the subarea on Harrison Avenue. Given the growth planned for the Harrison-Fourth Avenue Corridor, Street upgrades, increased bus and other public transportation has to be a part of the solution and yet, the planning for installing higher frequency bus service and signal prioritization will not even start until 2026.

2. The Future of Black Lake Blvd.

Another of the three main Triangle arterials (Black Lake Blvd.) will be the subject of another study (Recommendation T-7, page 73) which has no target date. Finally, there will be a micro-mobility feasibility study at an undefined future date. So, the future transit hub and transportation network will be undefined until three additional studies are completed at some undefined time in the future. How will the additional thousands of average daily trips for the new residents and employees be addressed?

C. Re-development of Existing Low-rise Commercial Areas into A Dense, Compact Neighborhood

Plan Framework Concept No. 5 (page 30) provides that support for existing businesses will consist of “preventing residential and commercial displacement and support locals in surviving and thriving”. Yet, at the same time, the subarea plan calls for high rise housing, extensive street changes and transportation changes, connectivity measures, new public amenities, infrastructure etc. How is all of this change possible without extensive current land use conversions?

D. Neighborhood Character and Scale of New Housing Complexes

The existing built environment in the Triangle is one or two stories and the subarea plan proposes up to 130 foot tall housing structures. These buildings will tower over the existing landscape especially where they would be close to existing housing on Black Lake Blvd and Harrison Avenue. The existing HDC-4 height limits with first floor commercial and residential units are much more suitable.

III. A Major City Investment will be needed For the Plan to Be Implemented:

A. Strategic Land Purchases

Under Goal LU-16 (page 44), it is suggested that the city “purchase parcels for future public-serving uses like affordable housing, affordable retail, parks or parklets, or even stormwater retention”. Depending on the desired use, the City could also choose to undertake the development or transfer control of the land through a below market rate sale or lease.

Based on the County land tax assessments for three Harrison Avenue parcels, HDC-4 land is valued at an average of \$21.50 per square foot or \$940,000 per acre. Acquiring sufficient land for 2,739 new housing units at an average density of 75 units per acre would cost 36 million dollars. City property taxes and even in-lieu fees would be a small fraction of the cost of acquiring land.

B. Assistance to Existing Businesses and Individuals

Under Housing (page 33), there is an objective f to “prevent or minimize residential displacement in and around the subarea” and the plan lists grant and loan opportunities for low-income housing preservation. However, rent stabilization, weatherization and energy efficiency grants, downpayments for buyers and long-time residents are not defined and the cost of these measures has not been examined.

In the Economic Development Chapter, the subarea plan proposes to “mitigate commercial displacement through redevelopment”. There are also proposals for city building and façade improvement grants which are to have a strong displacement component, ground floor commercial financing assistance through city Community Development Block Grants or the formation of a Public Development Authority along with maximum store size mandates, and requiring that certain types of businesses have rental opportunities.

The city would also pay for marketing, signage, technical assistance, and/or grants or forgivable loans as reparations for revenue lost during construction projects (redevelopment or street/infrastructure projects). There would also be “commercial tenant protections through city actions such as tenant harassment protections, to give tenants the legal recourse. The costs and the impact of these constraints on the re-development of this subarea are not explored.

C. Transportation Projects

There are a total of 20 transportation projects listed in Table 7-1 (pages 75-77) consisting of multi-modal placemaking, cross walk improvements, bicycle facilities, a total of five or potentially more roundabouts and the US-101 West Olympia Access project. Most of the expensive roundabout projects on the three main arterial roads are projected for completion after 2045, long past the study period. Most of the new bicycle projects are projected for the Beyond 2045 period or have no projected completion date. The crosswalk improvements are the only transportation scheduled for the next twenty years.

The Kenyon Street-West 4th Avenue Mall Loop Drive investments which are key for this entire subarea plan are listed as beyond 2045 and placemaking on Capital Mall Drive has no projected completion date. Having most of the significant transportation improvements occurring after 2045 isn't acceptable for the transformation of this subarea into a mixed use, walkable community.

D. Catalyst Projects and Infrastructure

Table 9-2 (Page 108) shows that a total high cost estimate cost of 17 million dollars for a half acre public park with a spray foundation, 300 foot retrofit of Fourth Avenue and 300 linear feet of a new Half Street. However, these three projects do not cover the many utility improvements such as stormwater capacity enhancements to implement low impact development standards, utility enhancements, other public amenities etc.

IV. Conclusions and Recommendations

There are so many other issues such as parking, building facades, public amenities, changes in the development code, tree requirement etc. that also need some careful thought and reflection. However, it comes down to this: a subarea plan must not be merely exploratory but a cohesive framework for implementing change, having analyzed and considered all of the important factors, constraints and opportunities. This plan does not meet this test at present and additional refinements are needed before the subarea plan is completed.