

I found these copies and thought they might be of interest to you.

Ask King County transportation department to provide you with all internal and external complaints against the county concurrency from 2000 to now. You will be surprised.

Sincerely,
Concerned citizen

From: Chen, Ho-Chuan
Sent: Thursday, June 19, 2003 3:33 PM
To: Edmond, Carolyn; Pelz, Dwight; Patterson, Julia; Sullivan, Cynthia; Lambert, Kathy; Phillips, Larry; Irons, David; Hammond, Steve
Cc: Barahimi, Hossein; Ishimaru, Jim; Davis, Jim; Wellander, Sean
Subject: Transportation Concurrency Investigation

<RE: KCDOT / DEA
investigation ...>

<RE: Questions
(retaliation inve...>

<RE: Request for an
investigate...>

Honorable Council members:

We are the Travel Forecasting and Data Management Group (TFDM), in King County Department of Transportation, Road Services Division, CIP and Planning Section. Our group is responsible for travel forecast model development, and developing travel forecasts for the Comprehensive Plan, CIP road projects, and other travel forecasting applications, as well as working to ensure consistency among County travel forecasting applications.

We are writing to bring to your attention what we believe are fatal flaws in the process used by the King County Transportation Concurrency program, and in particular their processes used to approve 1508 single-family units for the Redmond Ridge development. We feel uniquely qualified to speak on this issue, as we developed the underlying model that the Concurrency program uses to process its applications. Certain assumptions used by the Concurrency program to process this development are so unusual that if they were to be applied to similar roadways countywide, it is likely that forecast models would show that there is no traffic congestion expected within King County or within the Puget Sound area. This simply defies common sense. We strongly urge you to support a thorough investigation of this matter, and we are available at any time should you have questions or wish to discuss these issues further. It is our desire to appropriately resolve these issues as soon as possible, to avoid further legal and political problems for the County.

The TFDM has identified the following fatal flaws with the Concurrency model:

- Unusually high roadway capacity assumptions for Novelty Hill Road
- Not including Snohomish County background growth
- Random Roadway speed changes
- Random road project capacity improvements
- Assigning 50% additional capacity for certain center left turn lanes
- Not validating the Concurrency base model
- Not following national standards and a valid process
- Not having the process and results reviewed by anyone with forecasting experience

You should also be aware that we have, for some time, attempted to convince our managers that the manner in which the Concurrency program is using the County model to process its applications is incorrect and would be vulnerable in a court of law.

On March 3, 2003, we filed a Whistle Blower Complaint with the King County Ombudsman's Office, with the hope that they would take necessary steps to investigate any and all unethical, unprofessional, or potentially illegal actions. However, the investigation was given to the DOT to manage, and it appears unlikely that it will effectively consider the questions we have raised.

Our group has over 70 years of combined experience working in the travel-forecasting field, and our staff has been involved in every major travel forecast modeling effort by the County over the last 20 years. Since our current group was formed 3 years ago, we have written and presented over a dozen papers on travel forecasting and travel model applications at professional conferences. We are committed to professionalism and integrity in the work we do, and take great pride in public service, with over 60 years of combined experience working for King County government.

Thank you for your consideration of our concerns. Please let us know if you have any questions; we would be happy to meet with you or your staff to discuss these issues further.

Sincerely,

Ho-Chuan Chen, PhD, P.E., Supervisor
Hossein Barahimi, Transportation Planner III
Jim Ishimaru, Transportation Planner III
Sean Wellander, Transportation Planner III
* Jim Davis, Transportation Planner II

Travel Forecasting and Data Management Group
CIP and Planning Section
Road Services Division
King County Department of Transportation

* currently is on vacation and is also part of this complaint.

Mr. Salemann,

We are the Travel Forecasting and Data Management Group (TFDM), Department of Transportation, King County. We filed a complaint with the King County Ombudsman's Office in February 28, 2003 regarding the King County Concurrency program. We are providing you with the original complaint (Attachment A), and other related information, to assist you in understanding the true subject matter of this investigation. For this investigation to be complete, it is absolutely essential to thoroughly investigate and independently verify the 12 key points we have included in this report.

We believe there are fatal flaws in the processes used by the King County Transportation Concurrency program. In particular, their processes used to approve 1508 single-family units for the Redmond Ridge East development. We sent a letter to King County Executive Ron Sims in this regard (Attachment B), and in Mr. Sims' response (Attachment C), he assured us that King County would hire an outside expert to review the model used to issue concurrency certificates. Executive Sims also assured us that we would have an opportunity to provide detailed information to this person. We believe that you were hired to conduct this investigation as the expert, and therefore wish to provide you with the following information, in order to assist you in your investigation.

Two different models. There are two different travel models used by the King County Department of Transportation (KCDOT). One is the Countywide model, which is developed and operated by the TFDM. The TFDM is responsible for travel forecast model development in King County, and travel forecasts for nearly all King County forecasting applications, including the King County Comprehensive Plan, KC CIP road projects, special studies at the direction of the Director of the KCDOT, and other travel forecasting applications. The TFDM also works to ensure consistency among County travel forecasting applications. The other model in use by the KCDOT is the Concurrency model. The Concurrency program is a unique application of the Countywide model, and is developed using the Countywide model as a base, from which significant modifications are made for the Transportation Concurrency Program.

Fatal Flaws and unethical practices. We believe that there are fatal flaws in the process used by the King County Transportation Concurrency program, and in particular their processes used to approve 1508 single-family units for the Redmond Ridge development. We also believe that these flaws cumulatively favor the approval of this development, violate King County ordinances, and include unacceptable and unethical practices. We respectfully ask that you investigate the following identified flaws in the Concurrency model used to process the Redmond Ridge East (RRE) development application:

1. The Concurrency model includes an unusually high roadway capacity (1,750 vehicles/direction) for Novelty Hill Road (NHR), which is in the immediate vicinity of RRE. This capacity assumption is nonstandard and significantly favors the approval of the RRE (attachment D, page4).
2. The Concurrency program arbitrarily changed roadway speeds on key roadways, including NHR. NHR was changed from a posted speed of 45 to 35 mph, without explanation (attachment E).

3. The Concurrency program arbitrarily changed actual distances on key roadways near the RRE development site, without explanation (attachment F).
4. The Concurrency program arbitrarily included several key unfunded road project improvements (Avondale Rd., Sahalee, 144th, and others). This is in violation of their own ordinance, and adds significant roadway capacity to the area. This results in a more favorable condition for the approval of any development in the area, including RRE (attachment G, pages 1, 5 & 6).
5. The Concurrency model did not include Snohomish County background growth. Since RRE is in an area impacted by Snohomish County traffic, this decision results in lower traffic volumes for the area, which is a more favorable condition for approval of any development in the area, including RRE.
6. The Concurrency model included numerous nonstandard and unexplained capacities throughout the area, including 50% additional capacity for certain center left turn lane improvements.
7. The Concurrency program did not validate the Concurrency base model. Without validation, it is not clear how well their future year (Concurrency) model is performing.
8. The Concurrency program does not follow national standards or processes. It is unclear what processes they followed in model development. Clear documentation has never been made available.
9. The Concurrency program does not have its process and results independently reviewed by anyone with forecasting expertise. None of their model development processes have been independently reviewed by an outside expert.
10. The Concurrency program provided false information to the King County Executive, King County Council and to the public, in their report, "Analysis of Alternative Transportation Concurrency Measures study" (attachment A, page 7).
11. The Concurrency program did not follow King County Auditor recommendations. In 1999, following a series of citizen group challenges to Concurrency development approvals in the Sammamish area, the King County Auditor performed an audit of the Concurrency Model. In that audit, he made a series of recommendations which to this day have not been implemented (attachment A, page 5).
12. The Concurrency program failed to follow FHWA Guidelines as stated in the Concurrency Ordinance (attachment A, page 5).

Without the above modifications to the model, the Concurrency Program would not have been able to issue concurrency certificates for 1,508 single-family units in RRE. The concurrency team made all the above changes since the time that the TFD presented the base model to that group in the year 2000.

The TFDM has over 70 years of combined experience working in the travel forecasting field, and our staff has been involved in every major travel forecast modeling effort by the County over the last 20 years. Since our current group was formed 3 years ago, we have written and presented over a dozen papers on travel forecasting and travel model applications at professional conferences. We are committed to professionalism and integrity in the work we do, and take great pride in public service, with over 60 years of combined experience working for King County government.

In addition, we would like to request a meeting with you as a group. We feel this would be beneficial to your investigation, and we are available to meet with you at your convenience. Please feel free to contact us at any time should you wish further information.

Sincerely,

Ho-Chuan Chen, PhD, P.E., Supervisor
Hossein Barahimi, Transportation Planner III
Jim Ishimaru, Transportation Planner III
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