RESOLUTION NO. 25-2050

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAKE FOREST PARK, WASHINGTON, ACCEPTING THE SPEED ANALYSIS AND EQUITY IMPACT ANALYSIS STUDIES FOR STATE ROUTES 522 AND 104

WHEREAS, the City of Lake Forest Park is a non-charter optional municipal code city as provided in Title 35A RCW, incorporated under the laws of the state of Washington, and has the authority to regulate the use of city streets pursuant to RCW 35A.11.020; and

WHEREAS, Chapter 10.06 of the Lake Forest Park Municipal Code ("LFPMC"), Automated Traffic Safety Cameras, is an important means to maintain and enhance the safety and welfare of the residents of the City of Lake Forest Park and ensure that the city's streets are used in a safe manner; and

WHEREAS, the City Council is considering the installation of traffic safety cameras along SR 104 (Ballinger Way) near Lake Forest Park Elementary, and along SR 522 (Bothell Way) between Ballinger Way and NE 165th Street; and

WHEREAS, a traffic study analysis was completed by the Transpo Group, which satisfies the requirements of LFPMC 10.06.010(B) and provides the City Council with the information required by RCW 46.63.220(3): analysis showing "a demonstrated need for traffic cameras based on one or more of the following in the vicinity of the proposed camera location: Travel by vulnerable road users, evidence of vehicles speeding, rates of collision, reports showing near collisions, and anticipated or actual ineffectiveness or infeasibility of other mitigation measures;" and

WHEREAS, pursuant to RCW 46.63.220(3), a study was completed by ECOnorthwest analyzing equity considerations of these cameras on the neighborhood including livability, accessibility, economics, education, and environmental health.

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Lake Forest Park, as follows**:**

Section 1. FINDINGS. The Whereas clauses above are incorporated herein as findings of the City Council.

Section 2. ACCEPTANCE OF TRAFFIC STUDY. Pursuant to chapter 10.06 LFPMC, the City Council accepts the traffic study analysis as completed by Transpo Group for State Routes 104 and 522, as shown in the attached Exhibit A.

Section 3. ACCEPTANCE OF EQUITY STUDY. Pursuant to RCW 46.63.220(3), the City Council accepts the equity study as completed by ECOnorthwest for State Routes 104 and 522, as shown in the attached Exhibit B.

Section 4. CORRECTIONS. The City Clerk is authorized to make necessary corrections to this resolution including, but not limited to, the correction of scrivener's/clerical errors, references, numbering, section/subsection numbers and any references thereto.

PASSED BY A MAJORITY VOTE of the members of the Lake Forest Park City Council this 11th day of December 2025.

APPROVED:

Tom French (Dec 15, 2025 18:43:31 PST)

Tom French
Mayor

ATTEST/AUTHENTICATED:

Matt McLean

Matt McLean
City Clerk

FILED WITH THE CITY CLERK: December 5, 2025
PASSED BY THE CITY COUNCIL: December 11, 2025
RESOLUTION NO.: 25-2050

EXHIBIT A

transpogroup
WHAT TRANSPORTATION CAN BE.

MEMORANDUM

Date:	April 18, 2025	**TG:**	1.23191.01
To:	Phillip Hill, City Administrator, City of Lake Forest Park		
From:	Bahar Azin, PhD and Jon Pascal, PE, Transpo Group		
Subject:	Evaluation of Additional Traffic Safety Cameras		

This memorandum evaluates potential new locations for additional traffic safety cameras in the City of Lake Forest Park. The analysis and information contained in the memorandum is meant to assist the City in determining whether new traffic safety cameras – both speed cameras and red-light cameras – should be installed and at what locations.

Purpose

The City of Lake Forest Park is considering the installation of automated speed cameras along SR 522 and SR 104, another speed camera on NE 178th Street, and a red-light camera at the intersection of SR 104 and 35th Ave NE. The purpose of the cameras would be to enhance roadway safety by encouraging and enforcing compliance with existing traffic safety regulations. This memorandum evaluates potential locations for the cameras by evaluating available speed, safety, and citation data to determine if additional enforcement would improve compliance of existing posted speed limits and other traffic regulations such as stoplight violations. The analysis aligns with RCW 46.63.220, which governs the use of automated traffic safety cameras in Washington State.

Approach

The memorandum is based on an evaluation of safety and traffic operations along the SR 522, SR 104, and NE 178th Street corridors. The analysis considers vehicle speeds, traffic volumes, crash data, and roadway context to assess current conditions. For the proposed red-light camera, red-light running violations are evaluated as well. The study examines the potential for traffic safety cameras to address the requirements of RCW 46.63.220.

State Law on Automated Traffic Safety Cameras

State law RCW 46.63.220 allows the use of automated traffic safety cameras to monitor speed violations in specific locations, including school speed zones, school walk zones, hospital speed zones, public park speed zones, roadway work zones, and along state highways within city limits that are classified as city streets. Automated traffic safety cameras are also allowed to be utilized to detect stoplight violations. The City has already located cameras to monitor stoplight violations along SR 522, and speed violations along several city arterials.

Before implementing or relocating cameras, an analysis of proposed locations must be conducted and documented. RCW 46.63.220 requires that the analysis must demonstrate a need for the cameras based on factors such as evidence of speeding, collision rates, near-miss reports, travel by vulnerable road users, or the ineffectiveness of other mitigation measures.

The law also mandates public notice, signage indicating automated camera enforcement, and annual reporting on traffic safety outcomes for each location with a camera. Additionally, cameras

may only capture vehicle information, preserving privacy by excluding driver or passenger identification.

Automated Speed Enforcement Cameras along State Highways

As mentioned, State law RCW 46.63.220 allows the use of automated traffic safety cameras to monitor speed violations along state highways within city limits that are classified as city streets, such as SR 522 and SR 104.

Corridor Descriptions

SR 522 is a four-lane east-west state route with two travel lanes in each direction and a posted speed limit of 40 mph through most of Lake Forest Park, with a small segment signed at 35 mph near the border with the City of Seattle. The roadway, which is classified as a principal arterial, provides access to a variety of commercial and residential areas along its length. The speed limit on SR 522 changes to 35 mph in the City of Kenmore, located immediately to the east.

SR 104 (Ballinger Way NE) is a two-lane north-south state route with a posted speed limit of 35 miles per hour (mph) from the northern city limits to 35th Avenue NE. The speed limit decreases to 30 mph between 35th Avenue NE and the intersection with SR 522. The roadway has a single lane in each direction and is classified as a principal arterial based on the City's Comprehensive Plan. The route passes through primarily residential areas, with notable landmarks including a school located south of 35th Avenue NE and the Town Center commercial area situated near the southernmost section of the corridor. A roundabout is planned on SR 104 at its intersection with 40th Place NE within the 30 mph speed zone.

The existing posted speed limits in and surrounding the City of Lake Forest Park are shown in Figure 1. The figure shows the posted speed limits along both state highways. Blue dots along each route indicate locations where speed data was collected using tube counters as part of this study effort.

Collision Records

Crash records over the most recent complete five-year period were reviewed for the corridor. The crash records are summarized in Table 1. Historical crash data was provided by WSDOT for the period of July 1, 2020, to July 31, 2024.

Table 1. Annual Collision Summary – 2020 to July 2024

Roadway Segment	2020	2021	2022	2023	2024[1]	Total	Annual Average
SR 104	5	8	6	7	3	29	6.3
SR 522	11	17	12	14	4	58	12.7

Source: WSDOT, 2024.
Note: Under 23 U.S. Code § 409 and 23 U.S. Code § 148, safety data, reports, surveys, schedules, lists compiled or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such reports, surveys, schedules, lists, or data.
1. 2024 collision data shown is for the period between January and July.

As shown in Table 1, SR 104 has experienced an annual average of more than six collisions, while SR 522 has seen an annual average of more than 12 collisions over the past five years. During this period, 29 total collisions were recorded on SR 104, and 58 collisions occurred along SR 522. The majority of these collisions resulted in property damage only, with injury rates of 30 percent on SR 104 and 28 percent on SR 522. One fatality was recorded on SR 104 during the

five-year period, involving a pedestrian on a scooter who was struck due to a failure to yield the right-of-way to a motorist.

Of the total collisions on SR 104, more than half of the collisions involved improper vehicle movements (improper passing, improper backing, failure to yield right-of-way, disregarding traffic control signs, or exceeding safe speeds). Similarly, on SR 522, the majority of collisions were associated with improper vehicle movements and one involved a bicyclist with minor injury.

Figure 1. Lake Forest Park Posted Speed Limits

Vehicle Speeds

Vehicle speeds were recorded at two locations on SR 104 and three locations on SR 522 using traffic counting tubes. For the two locations on SR 104 and two of the locations on SR 522, data was collected for one week in October 2024 and captured hourly speed measurements for both travel directions at each site. For the remaining location on SR 522 (between SR 104 and the city boundary with Kenmore), data was collected for one week in April 2025. During the data collection period, the posted speed limit was 40 mph at the three data collection sites on SR 522. For SR 104, the posted speed limit was 30 mph at the southern data collection site and 35 mph at the northern data collection site.

Key speed indicators include the median speed, 85th percentile speed, 10 mph pace, percent in pace, and percent of vehicles 5 mph over the speed limit. The key indicators are used to help identify if a speeding problem exists and to what extent. The definition and purpose of the speed indicators are described below. Table 2 summarizes the key speed indicators along the SR 522 corridor. Table 3 summarizes the key speed indicators along the SR 104 corridor.

Table 2. SR 522 Speed Data Summary (2024-2025)

Indicator	SR 522 (East of SR 104)		SR 522 (North of 165th)		SR 522 (South of 165th)	
	WB	EB	WB	EB	WB	EB
Posted Speed Limit (mph)	40	40	40	40	40	40
Average Daily Traffic (vehicles)	20,500	20,600	15,900	11,400	16,600	16,500
Median Speed (mph)	44	44	43	39	40	38
85th Percentile Speed (mph)	49	49	48	45	46	44
10 mph Pace (mph)	39-49	39-49	38-48	35-45	36-46	34-44
% in Pace	71%	68%	67%	53%	57%	55%
% of Vehicles 5 mph over Speed Limit[1]	42%	39%	38%	17%	20%	10%

1. Represents the vehicles exceeding the posted speed limit by at least 5 mph.

Table 3. SR 104 Speed Data Summary (2024)

Indicator	SR 104 (North of 35th)		SR 104 (South of 35th)	
	NB	SB	NB	SB
Posted Speed Limit (mph)	35	35	30	30
Average Daily Traffic (vehicles)	6,900	7,200	7,200	7,700
Median Speed (mph)	35	35	33	35
85th Percentile Speed (mph)	40	40	37	39
10 mph Pace (mph)	31-41	31-41	28-38	30-40
% in Pace	72%	76%	79%	84%
% of Vehicles 5 mph over Speed Limit[1]	13%	14%	28%	48%

1. Represents the vehicles exceeding the posted speed limit by at least 5 mph.

Key Speed Indicators

Median Speed. The speed in which 50 percent of all traffic is traveling at or below. The statistical median is used as a point of reference in understanding the prevailing conditions. Ideally, and in compliance with the City's traffic calming policy, the median speeds should be at or under the posted speed limit.

85th Percentile Speed. The speed in which 85 percent of the traffic is traveling at or below. Typically, and in compliance with the City's traffic calming policy, the 85th percentile speed should be within 0 to 5 mph of the posted speed. 85th percentile speeds of 5 to 10 mph over the posted speed are of concern, but still within typical ranges, and per the City's traffic calming policy, typically addressed with education and enforcement, such as speed feedback signs.

10 mph Pace. The 10 mph pace is a measure of the range in speeds and is defined as the consecutive 10 mph range containing the highest number of vehicles. Typically, the upper limit of the 10 mph pace should be near the posted speed limit.

Percent in Pace. The percent in pace represents the percentage of all vehicles traveling within the 10 mph pace. It is desirable to have a high percentage of the total number of vehicles in the 10 mph pace.

Percent of Vehicles 5 mph over the Speed Limit. A measure representing the number of vehicles traveling over the posted speed limit by at least 5 mph. This represents the percentage of vehicles that could be the target of automated traffic safety cameras since citations are usually given to vehicles exceeding the speed limit by more than 5 mph.

SR 522 Vehicle Speeds

As shown in Table 2, 42 percent of total daily westbound traffic and 39 percent of total daily eastbound traffic along SR 522 north of SR 104 travel more than 5 mph above the posted speed limit. Between SR 104 and 165th Street, 38 percent of total daily westbound traffic and 17 percent of total daily eastbound traffic exceed the speed limit by more than 5 mph. South of 165th Street on SR 522, 20 percent of westbound traffic and 10 percent of eastbound traffic exceed the speed limit by more than 5 mph.

The speed distribution along SR 522 indicates that most vehicles in the eastbound direction travel near the posted speed limit, except along the segment north of SR 104 where exceeding the posted speed limit occurs more frequently. The westbound traffic on SR 522 tends to exceed the posted speed limit more frequently along the entire corridor within the city.

SR 104 Vehicle Speeds

On the northern half of SR 104, where the posted speed limit is 35 mph, the percentage of vehicles exceeding the speed limit by more than 5 mph is 14 percent of total daily southbound traffic and 13 percent of total daily northbound traffic. However, 28 percent of total daily northbound traffic and 48 percent of total daily southbound traffic on the southern half of SR 104 travel more than 5 mph over the speed limit.

The City recently coordinated with WSDOT to reduce the speed limit on SR 104 north of 35th Avenue NE from 40 mph to 35 mph. As shown in Table 3, the median speed for this segment aligns with the adjusted speed limit and the 85th percentile speed is only 5 mph higher than the adjusted speed limit in both directions of SR 104. This speed data indicates a high level of speed limit compliance along this segment of SR 104. Since the City and WSDOT recently reduced the speed limit on this segment and there is a high compliance rate, the data does not suggest that the segment would be a good candidate for automated speed enforcement cameras.

Findings/Recommendations

The key findings and recommendations of the speed and safety analysis along SR 522 and SR 104 are the following:

SR 522 Corridor

- **Vehicle Speeds:** Existing speed data shows a persistent trend of vehicles traveling over the speed limit, particularly in the westbound direction between NE 165th Street and SR 104 and north of SR 104 in both directions. For the segment north of SR 104, records show that approximately 42 percent of vehicles travel 5 mph or greater above the speed limit in the westbound direction and 39 percent in the eastbound direction. Between NE 165th Street and SR 104, 38 percent of vehicles travel 5 mph or greater above the speed limit in the westbound direction and 17 percent in the eastbound direction.
- **Collision Records:** Over the past five years, the SR 522 corridor has experienced an average of more than 12 collisions annually. Most collisions resulted in property damage only, with 28 percent of these collisions involving injuries. Exceeding the safe speed was a contributing factor in two of the collisions.

Recommendation for SR 522: *Given the analysis findings, the City could consider the use of automated speed enforcement cameras based on state law RCW 46.63.220, which allows such cameras to be used in locations experiencing consistent speeding or safety concerns along state highways. The potential locations where speeding is most prevalent along SR 522 are east of SR 104 and north of NE 165th Street. Either location could be a candidate for automated speed enforcement cameras.*

SR 104 Corridor

- **Vehicle Speeds:** Existing speed data shows differences in vehicle speeds between the northern and southern segments of SR 104. The more significant number of vehicles exceeding the speed limit is observed along the southern segment of SR 104, south of 35th Avenue NE, where the speed limit is 30 mph. Records show that approximately 48 percent of daily vehicles travel over 5 mph above the speed limit in the southbound direction and 28 percent in the northbound direction.
- **Collision Records:** Over the past five years, the SR 104 corridor has experienced an average of more than 6 collisions annually. Approximately 30 percent of the collisions resulted in injuries including one fatal collision involving a pedestrian during this period. Studies have shown that vehicle speeds are directly linked to the severity of collisions.

Recommendation for SR 104: *Based on the analysis, the City could consider the use of automated speed enforcement cameras based on state law RCW 46.63.220, which allows such cameras to be used in locations experiencing consistent speeding or safety concerns along state highways. The roadway segment adjacent to Lake Forest Park Elementary School, where speeding is most prevalent, is a potential location for this intervention. One criteria for placement of automated enforcement cameras is whether the location serves vulnerable users. This location on SR 104 is next to an elementary school, and young children would be consistent with the definition of vulnerable users.*

Red-light Camera at SR 104 / 35th Avenue NE Intersection

State law RCW 46.63.220 and 46.63.230 allow municipalities to use automated traffic safety cameras to detect stoplight violations at intersections of two or more arterials controlled with a traffic signal. The City requested that the intersection of SR 104 and 35th Avenue NE be analyzed for an automated enforcement camera to detect stop light violations. These cameras are otherwise referred to as "red-light cameras." The City has been utilizing similar cameras along SR 522 for several years.

Intersection Description

SR 104 (Ballinger Way NE) is a two-lane north-south state route with a posted speed limit of 35 miles per hour (mph) from the northern city limits to 35th Avenue NE, and 30 mph between 35th Avenue NE and SR 522. The roadway has a single lane in each direction and is classified as a principal arterial based on the City's Comprehensive Plan.

35th Avenue NE is a two-lane north-south route with a posted speed limit of 25 mph and is classified as a minor arterial. The intersection of the two roadways is controlled by a traffic signal. At the intersection, there are left-turn lanes provided along SR 104, but not along 35th Avenue NE.

Collision Records

Crash records over the most recent complete five-year period were reviewed for the intersection. The crash records are summarized in Table 4. Historical crash data was provided by WSDOT for the period of July 1, 2020, to July 31, 2024.

Table 4. Annual Collision Summary – 2020 to July 2024

Intersection	2020	2021	2022	2023	2024[1]	Total	Annual Average
SR 104/35th Ave NE	2	2	0	1	2	7	1.5

Source: WSDOT, 2024.
Note: Under 23 U.S. Code § 409 and 23 U.S. Code § 148, safety data, reports, surveys, schedules, lists compiled or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such reports, surveys, schedules, lists, or data.
1. 2024 collision data shown is for the period between January and July.

As shown in Table 4, the intersection of SR 104 and 35th Avenue NE has experienced an annual average of more than one collision. During this period, a total of seven collisions were recorded near the intersection of SR 104 and 35th Avenue NE. Of these, four resulted in injuries.

Vehicle Counts and Speeds

Vehicle speeds were recorded at two locations on SR 104 using traffic counting tubes. Data was collected for one week in October 2024 and captured hourly speed measurements for both travel directions at each site. The posted speed limit was 30 mph at the southern data collection site and 35 mph at the northern data collection site which are shown in Figure 1. Vehicle turning movement counts were collected at the intersection of SR 104 and 35th Avenue NE during a weekday PM peak hour and were found to be approximately 1,455 per hour.

Key speed indicators include the median speed, 85th percentile speed, 10 mph pace, percent in pace, and percent of vehicles 5 mph over the speed limit. The definition and purpose of the speed indicators were described is the evaluation of speed enforcement cameras in the previous section. Table 5 summarizes the key speed indicators along SR 104 in the vicinity of the intersection.

Table 5. Speed Data Summary (2024)

Indicator	SR 104 (North of 35th Ave)		SR 104 (South of 35th Ave)	
	NB	SB	NB	SB
Posted Speed Limit (mph)	35	35	30	30
Average Daily Traffic (vehicles)	6,900	7,200	7,200	7,700
Median Speed (mph)	35	35	33	35
85th Percentile Speed (mph)	40	40	37	39
10 mph Pace (mph)	30.5-40.5	30.8-40.8	27.8-37.8	29.9-39.9
% in Pace	72.3	75.5	79%	84%
% of Vehicles 5 mph over Speed Limit[1]	13%	14%	28%	48%

1. Represents the vehicles exceeding the posted speed limit by at least 5 mph.

As shown in Table 5, there are differences in vehicle speeds east and west of 35th Avenue NE given the intersection is where the posted speed limit transitions between 35 and 30 mph on SR 104. On the northern half of SR 104, where the posted speed limit is 35 mph, the percentage of vehicles exceeding the speed limit by more than 5 mph is 14 percent of total daily southbound traffic and 13 percent of total daily northbound traffic. However, 28 percent of total daily northbound traffic and 48 percent of total daily southbound traffic on the southern half of SR 104 travel more than 5 mph over the speed limit.

It is possible the changes in the posted speed limit in the vicinity of the intersection may influence travel behavior and safety at the intersection.

Red-Light Running Citations and Public Complaints

Red-light running citation data for the intersection of SR 104 and 35th Avenue NE was acquired from the Lake Forest Park Police Department. According to the information received, no stoplight violation citations have been recorded at this intersection over the past five years.

However, anecdotal feedback from conversations with the police department and the city indicates two documented complaints in this area since 2017 regarding speeding. Traffic safety complaints in the City are typically forwarded to a traffic calming group comprised of the police, public works, and a traffic engineering consultant. The two documented complaints near the intersection, which both occurred in 2020, have resulted in the implementation of a speed feedback sign, and a reduction of the posted speed limit in the northern part of SR 104 to 35 mph in August of 2024. Additionally, there have been incidents involving crashes with a fence located just east of the intersection, which was most recently struck by a vehicle in 2019.

Key Findings

The key findings of the analysis at the SR 104 and 35th Avenue NE intersection are the following:

- **Red-light Camera Legislation:** The intersection is controlled by a traffic signal and is at a junction of two arterials, thus making it eligible for potential automated traffic safety cameras to monitor and detect stop light violations.
- **Vehicle Speeds:** Existing speed data shows a persistent trend of vehicles traveling over the speed limit along SR 104 despite existing speed management tools in the vicinity of the intersection. No data exists to indicate whether vehicle speeds are resulting in a higher than usual number of unsafe maneuvers at the intersection.

- **Collision Records:** Over the past five years, the intersection has experienced an annual average of more than one collision. None of the collisions were found to correspond to red-light running.
- **Citations:** Based on data from the police, no stoplight violation citations have been recorded at this intersection over the past five years.

Recommendation: *The absence of citations noting stoplight violations and limited evidence of violations directly related to signalized traffic movements reduce the justification for an automated red-light camera at this intersection. According to RCW 46.63.220, the installation of automated traffic safety cameras requires evidence of specific safety issues, such as a history of red-light violations, collisions, or near-miss incidents. Other mitigation measures, such as enhanced enforcement or additional speed feedback signs as described in the City's Neighborhood Traffic Calming Program, may be more appropriate to address concerns at this location.*

Automated Speed Enforcement Cameras along NE 178th Street

The NE 178th Street corridor within the City of Lake Forest Park currently has two existing automated speed enforcement cameras as shown in Figure 2. The City is interested in determining if another camera is necessary in the immediate vicinity of Brookside Elementary School.

Corridor Description

NE 178th Street is a two-lane, east-west roadway with a posted speed limit of 25 miles per hour (mph), including a single lane in both eastbound and westbound directions. The roadway is classified as a Minor Arterial by the City based on the adopted Comprehensive Plan. There is a designated school zone located between 35th Avenue NE and 37th Avenue NE, with a reduced speed limit of 20 mph. Additionally, two speed feedback signs are positioned at the intersections of NE 178th Street and 28th Avenue NE, and NE 178th Street and 40th Avenue NE.

Speed Enforcement Camera Citations

There are two automated speed enforcement cameras positioned along the NE 178th Street corridor to monitor traffic in both directions in the vicinity of Brookside Elementary. The cameras initially monitored school zone speeds during designated school hours. Prior to September 2024, they enforced a 20 mph school zone speed limit from 7:30 to 9:30 am and 2:30 to 4:30 pm on school days. While the cameras recorded speeds continuously, citations were issued only during enforcement hours. The cameras also operated during early release periods, contributing to some midday citations.

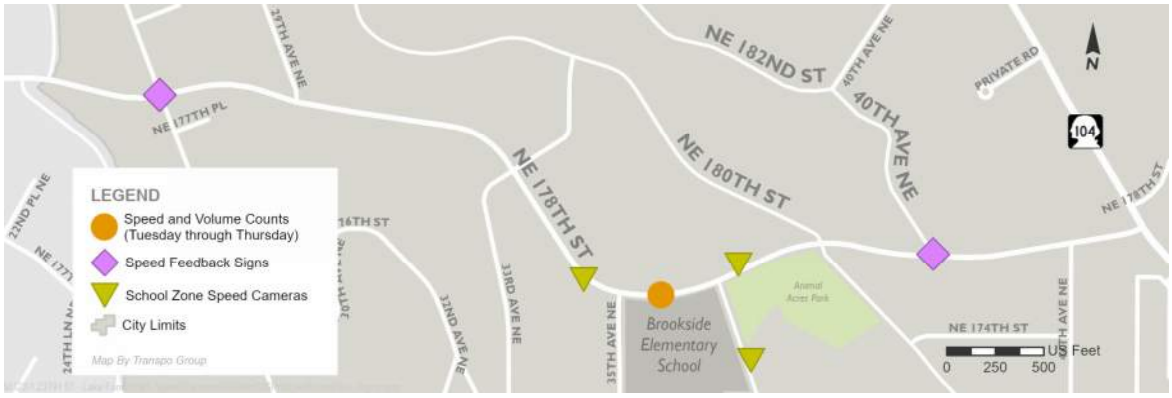

Figure 2. Lake Forest Park Posted Speed Limits

In September 2024, the cameras transitioned to 24 hour, 7 days per week (24/7) enforcement and were moved to new locations along the corridor. One camera is positioned near NE 180th Street to enforce the speed limit in the westbound direction approaching the school. The second camera is located east of 33rd Avenue NE to enforce the speed limit in the eastbound direction approaching the school. Currently, the cameras enforce a 20 mph speed limit during school start and end times and a 25 mph speed limit for the remainder of the day and on non-school days.

Data for both directions of travel were collected from the speed enforcement cameras for October and November 2024, reflecting the new enforcement schedule. The analysis includes citation data and speed trends during the day, capturing the impact of the expanded operational schedule. A summary of citations issued by each hour of the day is shown in Table 6.

Table 6. Average Speed Camera Citations Records by Time of the Day per Day

Time Period[1]	Eastbound Direction	Westbound Direction
0:00-0:59 AM	1	1
1:00-1:59 AM	1	1
2:00-2:59 AM	0	0
3:00-3:59 AM	0	0
4:00-4:59 AM	0	0
5:00-5:59 AM	1	1
6:00-6:59 AM	1	1
7:00-7:59 AM	1	1
8:00-8:59 AM	1	1
9:00-9:59 AM	2	2
10:00-10:59 AM	4	3
11:00-11:59 AM	4	4
12:00-12:59 PM	4	4
1:00-1:59 PM	5	4
2:00-2:59 PM	4	4
3:00-3:59 PM	2	3
4:00-4:59 PM	4	4
5:00-5:59 PM	5	7
6:00-6:59 PM	6	7
7:00-7:59 PM	5	5
8:00-8:59 PM	3	3
9:00-9:59 PM	3	3
10:00-10:59 PM	2	2
11:00-11:59 PM	2	1
TOTAL	**62**	**60**

NOTE: 2024 data from October 2024 to December 2024

The citation records indicate that 122 citations are recorded on an average day, which if were to stay consistent through an entire year, could be more than 44,000 citations. However it is expected the number of citations will decline over time, and be lower on average when school is not in session. The data also indicates that a higher number of citations are observed during the afternoon hours, when traffic volumes are greater. Additionally, the number of citations per direction are consistent, indicating that the downhill grade of NE 178th Street does not necessarily contribute to a higher number of vehicles exceeding the speed limit.

Vehicle Counts and Speeds

Vehicle speeds were collected along the study corridor at one location in front of Brookside Elementary School (shown in Figure 2) by using automated tube counters for one week in October 2024. Additionally, data from the two speed feedback signs was compiled for one week in late January/early February 2025. The posted speed limit on the corridor during the data collection period was 25 mph, and 20 mph during school start and end times. Table 7 summarizes the key speed indicators for the corridor.

Table 7. NE 178th Street Speed Data Summary (2024-2025)

Indicator	At Brookside Elementary		At Speed Feedback Signs	
Indicator	**Eastbound**	**Westbound**	**Eastbound**	**Westbound**
Posted Speed Limit (mph)	25 mph	25 mph	25 mph	25 mph
Average Daily Traffic	2,860 vehicles	2,740 vehicles	3,075 vehicles	2,210 vehicles
Median Speed	22 mph	22 mph	22 mph	21 mph
85th Percentile Speed	26 mph	27 mph	27 mph	26 mph
10 mph Pace	17-27 mph	17-27 mph	18-28 mph	17-27 mph
% in Pace	86%	79%	67%	70%
% of Vehicles 5 mph over Speed Limit[2]	2%	6%	3%	3%

1. Represents the vehicles exceeding the posted speed limit by at least 5 mph.

As shown in Table 7, the number of vehicles driving at 5 mph or more above the speed limit is about 2 to 3 percent in the eastbound direction and 3 to 6 percent in the westbound direction. In comparing the 2024 versus 2023 speed data when the cameras only monitored the school speed zone, there is improved compliance with speed limits throughout the day. Median and 85th percentile speeds have dropped, and the percentage of vehicles traveling more than 5 mph is lower.

Key Findings

The key findings and recommendation of the speed analysis along NE 178th Street are the following:

- **Vehicle Speeds:** Existing vehicle speed data shows much improved driver compliance with posted speed limits throughout the day with the new speed enforcement cameras in operation.
- **Citations:** The number of citations per day is much lower than previously predicted. The number of daily citations is averaging around 120 per day, and the prior study indicated that it could be as high as 350 to 470 citations per day.

Recommendation: *The speed and citation data indicates that additional cameras along the corridor would not be necessary since very few vehicles are traveling 5 mph over the speed limit. There is a high level of driver compliance with the posted speed limits, and the existing cameras appear to be maintaining speeds in the vicinity of Brookside Elementary School. The downhill grade of NE 178th Street as it approaches the school from the west does not appear to result in higher vehicle speeds. Other potential camera locations along the corridor were not considered given the limited amount of available data.*

EXHIBIT B

October 2025

Traffic Speed Safety Camera Equity Impact Analysis

City of Lake Forest Park, WA

Prepared for: Tom French, Mayor of City of Lake Forest Park

This report was produced by ECOnorthwest team members Jade Aguilar, Jolie Brownell, Taylor Burton, Aditya Gadkari, and Marty Marquis. For more information, please contact Jade Aguilar at aguilar@econw.com.

ECOnorthwest
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Table of Contents

1. Equity Impact Snapshot

EDUCATION

- Installing Speed Safety Cameras (SSCs) along SR 522 and SR 104 can help advance education equity by making it safer for students and families who walk, bike, or drive to school. This is especially important along SR 104, where Lake Forest Park Elementary is located near one of the corridor's fastest sections.
- Slowing traffic in this area reduces crash risks and helps ensure that all children and adults, regardless of where they live or their income, can get to school safely. Automated enforcement also removes the potential for bias in traffic stops, creating a fairer and more consistent approach to safety.

ECONOMICS

- It is important to ensure that both the economic benefits and potential burdens of Speed Safety Cameras (SSCs) are distributed equitably across the community. The City of Lake Forest Park intends to reinvest revenues generated from SSCs into local street safety programs, school zone improvements, and pedestrian infrastructure that directly benefit residents and commuters alike, advancing both transportation safety and economic equity.
- At the same time, it is recognized that commuters traveling along SR 104 and SR 522, who may be more economically diverse and have lower incomes than nearby residents, could face a greater financial burden from speed enforcement.

ENVIRONMENTAL HEALTH

- While a short-term measure, the proposed SSCs could provide revenue for the City's general fund, helping to finance street safety initiatives such as roadway upgrades, maintenance, and projects that improve the environmental quality and overall health of nearby neighborhoods.

LIVABILITY

- Community members have shared that speeding on SR 104 and SR 522 makes walking, biking, and driving feel unsafe. Installing Speed Safety Cameras (SSCs) on these corridors can help mitigate traffic, reduce crashes, and make it easier for people to move safely through their neighborhoods. By slowing cars and improving safety near schools, parks, and homes, the SSCs can make Lake Forest Park a more comfortable and livable place for everyone.

ACCESSIBILITY

- Two important accessibility considerations for the proposed SSCs along SR 522 and SR104 include 1) the use of plain and clear signage and 2) the administration of traffic infractions in accessible ways (e.g., online, mail, readable text, etc.).

2. Introduction

Purpose

In accordance with the 2023 Revised Code of Washington (RCW) 46.63.170(1)(d)(ii),[1] the City of Lake Forest Park ("City") hired ECOnorthwest to conduct an Equity Analysis for the installation of automated speed cameras along two state routes (SR) running through the City—SR 522 and SR 104. The City Council will use the recommendations provided by the Equity Analysis to decide whether traffic safety cameras to detect speed violations should be placed at the following locations:

- the length of SR 522 within the corporate boundaries of the City, and
- the length of SR 104 within the corporate boundaries of the City.

RCW 46.63.170(1)(D)(II)

Equity Analysis

"A city locating an automated traffic safety camera under this subsection (1)(d) must complete an equity analysis that evaluates livability, accessibility, economics, education, and environmental health…"

Background

Starting February 6, 2025, the City introduced new speed limits on local access streets and arterials, and collectors across Lake Forest Park to ensure safer streets for everyone.[2] This effort builds upon a multi-year initiative to reduce accidents and protect pedestrians, bicyclists, and drivers, while fostering a more livable, walkable community where all residents can feel at ease. The City's changes reflect community input and the latest research on speed limits and community safety. To support this effort, the City has requested a study to evaluate the potential for lowering speed limits on state routes to enhance roadway safety, reduce collision risk, and improve comfort for its residents. This initiative aligns with evolving national best practices for setting speed limits, which now emphasize the importance of local land use context and the safety of all roadway users.

Back in 2022, Washington State passed ESSB 5974, which expanded where cities can use automated traffic speed cameras to include areas near hospitals, parks, school walking routes, and high-crash intersections. In response, Lake Forest Park adopted Ordinance No. 1251 to allow cameras in school walk areas and park speed zones, and Ordinance No. 23-1283 in 2023 to permit their use in racing-related zones. Under RCW 46.63.170(1)(d)(ii), cities must conduct an equity assessment before installing safety speed cameras, evaluating potential

[1] RCW 46.63.170(1)(d)(ii).
[2] https://www.cityoflfp.gov/689/Traffic-Calming-and-Vehicle-Speed-Reduct

impacts on community livability, accessibility, economic well-being, education, and environmental health.[3]

In support of the City's broader vision to create a safe, sustainable, accessible, and equitable transportation system, two highway segments, including Bothell Way (SR 522) and Ballinger Way (SR 104) within the City's corporate boundaries, have been identified for safety camera placement and equity analysis. Both corridors serve as critical transportation routes within Lake Forest Park, exhibiting roadway characteristics, land use patterns, and speed trends that make them strong candidates for automated speed enforcement to improve safety outcomes.

Why SSCs Require An Equity Impact Analysis

Speed safety cameras have been shown to reduce speed violations and crashes significantly.[4] Consequently, when compared to traditional traffic enforcement (e.g., traffic stops), research suggests that SSCs have the potential to be more equitable by 1) reducing pedestrian fatalities from car crashes, especially Black, Indigenous, People of Color (BIPOC) who are overrepresented in traffic deaths, and 2) removing social bias (e.g., racial profiling) from traffic speed enforcement by solely capturing vehicles and vehicle license plates.[5] However, considerable equity considerations are needed regarding the placement and location of SSCs.

As speed enforcement tools, SSCs must be contextualized within histories of planning and transportation systems that have disproportionately impacted BIPOC, lower-income, and other marginalized communities.[6] For instance, in various cities, transportation infrastructure in low-income and minority communities has historically been neglected, contrasting with better-designed roads in predominantly white and wealthy neighborhoods. Consequently, highways and main roads with higher speeds often intersect historically marginalized areas due to past environmental injustices and poor planning.[7] Introducing SSCs in these communities might fail to address the problem by penalizing residents for the city's failure to invest in proper road engineering. In this way, without careful consideration of camera placement, SSCs can have inequitable consequences, particularly for the communities that speed safety cameras are intended to benefit.

[3] RCW 46.63.170(1)(d)(ii).
[4] Washington Traffic Safety Commission. *Speed Safety Camera Readiness Guide*. 2023.
[5] Parsons, Susannah. 2021. "Can Automated Speed Safety Systems Advance Racial and Economic Equity." SPUR News., See also, Smart Growth America. Dangerous By Design. 2022.
[6] Washington Traffic Safety Commission. *Speed Safety Camera Readiness Guide*. 2023., See also Hopkins, Emily, and Sanchez, Melissa. 2022. "Chicago's 'Race-Neutral' Traffic Cameras Ticket Black and Latino Drivers the Most." ProPublica.
[7] Washington Traffic Safety Commission. *Speed Safety Camera Readiness Guide*. 2023.

3. Equity Impact Analysis

The City of Lake Forest Park is required to assess the placement of SSCs on SR 522 and SR 104 to ensure the equitable distribution of benefits while also addressing any possible disproportionate distribution of burdens and negative impacts. To support this analysis, ECOnorthwest's team evaluated central equity questions informed by best practices on the equitable decision-making, placement, deployment, and evaluation of speed safety cameras. Informed by both publicly available data and local insights shared by City staff, the rest of this report speaks to top equity questions in the context of the proposed SSCs and considers their alignment with national best practices.

Answer Key

Equity Target Met: Facets of SSCs that reflect best practices.

Equity Target Warning: Negative equity implications that need to be addressed.

Equity Target Opportunity: Facets of SSCs to consider that reflect best practices.

Before Speed Camera Placement

» Does the proposed SSC location align with RCW 46.63.220?

Washington State law RCW 46.63.220 permits the use of SSCs to monitor speed violations along state highways that are within city limits. Such city streets must have evidence of safety issues, such as a history of speeding, collisions, or near-miss incidents. ***Both SR 522 and SR 104 are classified as city streets and show above average speeding and collision frequency.***

- **SR 522** (Bothell Way NE) is a four-lane east–west state route with a posted speed limit of 40 mph through most of Lake Forest Park, dropping to 35 mph near the Seattle border. The corridor includes a mix of commercial, multifamily, and single-family residential driveways with direct highway access, many of which are visually obscured by trees and fencing. These visual barriers, coupled with side streets that intersect at sharp angles, create limited sight lines and challenging turning movements.
- **SR 104** (Ballinger Way NE) is a two-lane north–south state route with posted speed limits of 35 mph in the northern section and 30 mph south of 35th Avenue NE. Classified as a principal arterial, SR 104 passes through predominantly residential areas, with single-family driveways, some multifamily housing, commercial destinations, a school south of 35th Avenue NE, and the Town Center commercial area near the southern end.

Multimodal Safety Index

The City's 2024 Safe Speed Study deployed a ***Multimodal Activity and Safety Index*** to evaluate its streets with higher pedestrian and bicycle activity or a history of safety issues resulting in lower speed limits.[8]

Figure 1: Roadway Multimodal Activity and Safety Index Scoring

Safe Street Study, TranspoGroup, 2024

Criteria	Measure	Points	Total Points
Multimodel Activity	Proximity to School	3	1 >6 pts
	Proximity to Park	2	
	Proximity to Town Center or Neighborhood Business Land Use	2	
Collision History	Roadway has at least one serious injury/fatal collision in last five years	3	2 3-6 pts
	Roadway has at least one pedestrian or bicycle collision in last five years	1	
Vehicle Speeds	Roadway has 85 percentile speed 3 mph or less of speed limit	3	3 <3 pts
Daily Traffic	Average Daily Traffic Volumes < 2,000 vehicles	2	
			Up to 16 possible points

While the initial study excluded any evaluation on the speed limits included on SR 522 and SR 104, the Transpo Group used the index to conduct an evaluation for both corridors to determine the appropriate speed limit for the City's Minor Arterial and Collector roadways.[9] They found that both SR 522 and SR 104 would score within the Multimodal Safety Index Level 1, which comes with a recommendation for a 25 mph posted speed limit (**Figure 1**).

- **SR 522:** Although SR 522 is not designated as a walking route due to the adjacent Burke-Gilman Trail, it scores an Index Level 1 on the Multimodal Safety Index, suggesting that a 25 mph speed limit would be appropriate under best practice guidance.[10] However, state regulations limit speed reductions to 5 mph at a time, setting a minimum of 35 mph.
- **SR 104:** Unlike SR 522, SR 104 *is* designated as a walking route in the City's Legacy 100-Year Vision and scores high on the Multimodal Safety Index, warranting a recommended 25 mph speed limit south of 35th Avenue NE.

In accordance with RCW 46.63.220, the Multimodal Safety Index scores of SR 522 and SR 104 ***indicate consistent speeding and safety concerns along state highways, recommending speed reduction mechanisms such as the implementation of SSCs along both corridors.***

Traffic Safety Concerns in the City of Lake Forest Park

Prior speed studies have revealed persistent speeding along both SR 522 and SR 104. A recent report by Transpo Group found that the traffic speed distributions along both SR 522 and certain segments of SR 104 exceed the posted speed limit frequently and showcase heightened crash rates.[11]

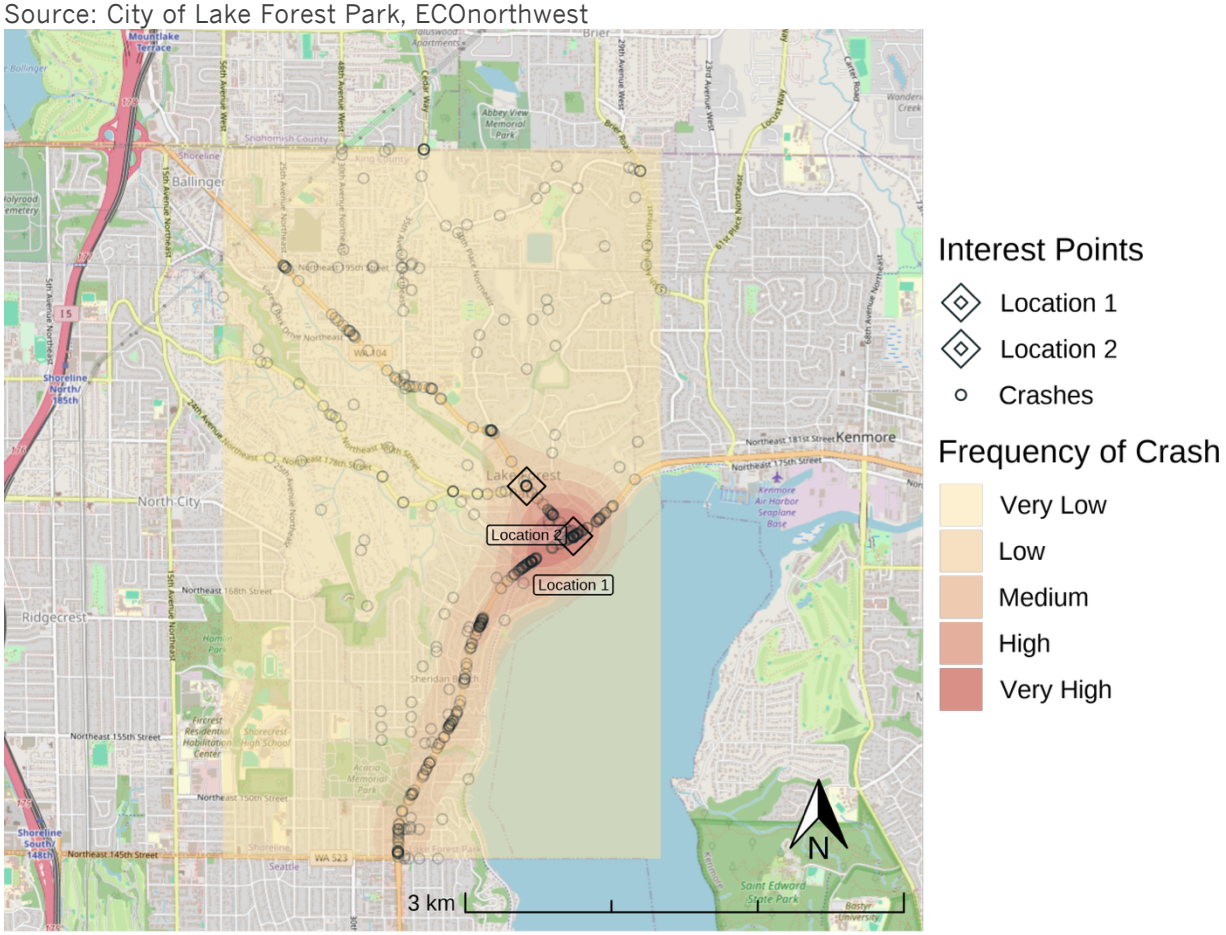
[8] City of Lake Forest Park. Safe Speed Study. 2024.

- **SR 522:** Westbound traffic on SR 522 tends to exceed the posted speed limit more frequently along the entire corridor within the City.[12]
- **SR 104:** Speed data indicates that the greatest speeding occurs along this southern segment, particularly adjacent to Lake Forest Park Elementary School. This area meets key criteria for automated enforcement, as it serves vulnerable users, specifically young children walking to and from school. Thus, targeted interventions are important to enhance pedestrian safety.[13]

Additionally, a history of speeding-related collisions along these corridors guided the decision to adopt automated enforcement methods. These findings are consistent with analyzed crash frequency data on inner-city streets from 2016 to 2023.[14]

Figure 2: Crashes on Inner-City Streets from 2019-2024

Source: City of Lake Forest Park, ECOnorthwest



[9] Transpo Group. Evaluation of Posted Speed Limits on the SR 522 & SR 104 Corridors. 2024.
[10] Ibid.
[11] Transpo Group. Evaluation of Additional Traffic Safety Cameras. 2024.
[12] Ibid.
[13] Transpo Group. Evaluation of Posted Speed Limits on the SR 522 & SR 104 Corridors. 2024.
[14] Lake Forest Park. n.d. Neighborhood Traffic Calming Program. Interactive WebGIS Portal.

Figure 2 shows the frequency of crashes on inner-city streets in the 7-year period. The high frequency of crashes over time, particularly at the intersection of SR 522 and SR 104, does make a strong case for improved traffic safety measures along these two state routes. Crash analysis along SR 522 and SR 104 show both a demonstrated need for traffic cameras based on rates of collision and speeding. ***In this way, the proposed SSC locations align with RCW 43.63.220.***

» Did community engagement inform the decision on the placement of these SSCs?

A key element to an equitable decision-making process is actively involving the community members who stand to be most positively or negatively affected.[15] Back in 2018, the City of Lake Forest Park did a robust engagement during the "Safe Streets" study[16], where community members elevated key speed concerns on SR 104 and SR 522. Many community members shared how they avoid the SR 104 & SR 522 intersection, by diverting onto NE 175th Street and NE 178th Street. Community residents voiced the desire to address safety risks on residential streets with blind curves and driveways. The community's top safety concerns center on reducing cut-through traffic and speeding, building continuous sidewalks, and making crossings at SR 104 & SR 522 intersections safer. ***The community has also made explicit calls to reduce both the SR 104 and SR 522 speed limit, add flashing crosswalk lights, and use cameras to slow traffic.*** The implementation of SSCs along SR 104 & SR 522 corridors, therefore, directly addresses past community desires for greater driver and pedestrian safety along SR 104 & SR 522 and greater calls for improved connectivity to schools, transit, and the Town Center.

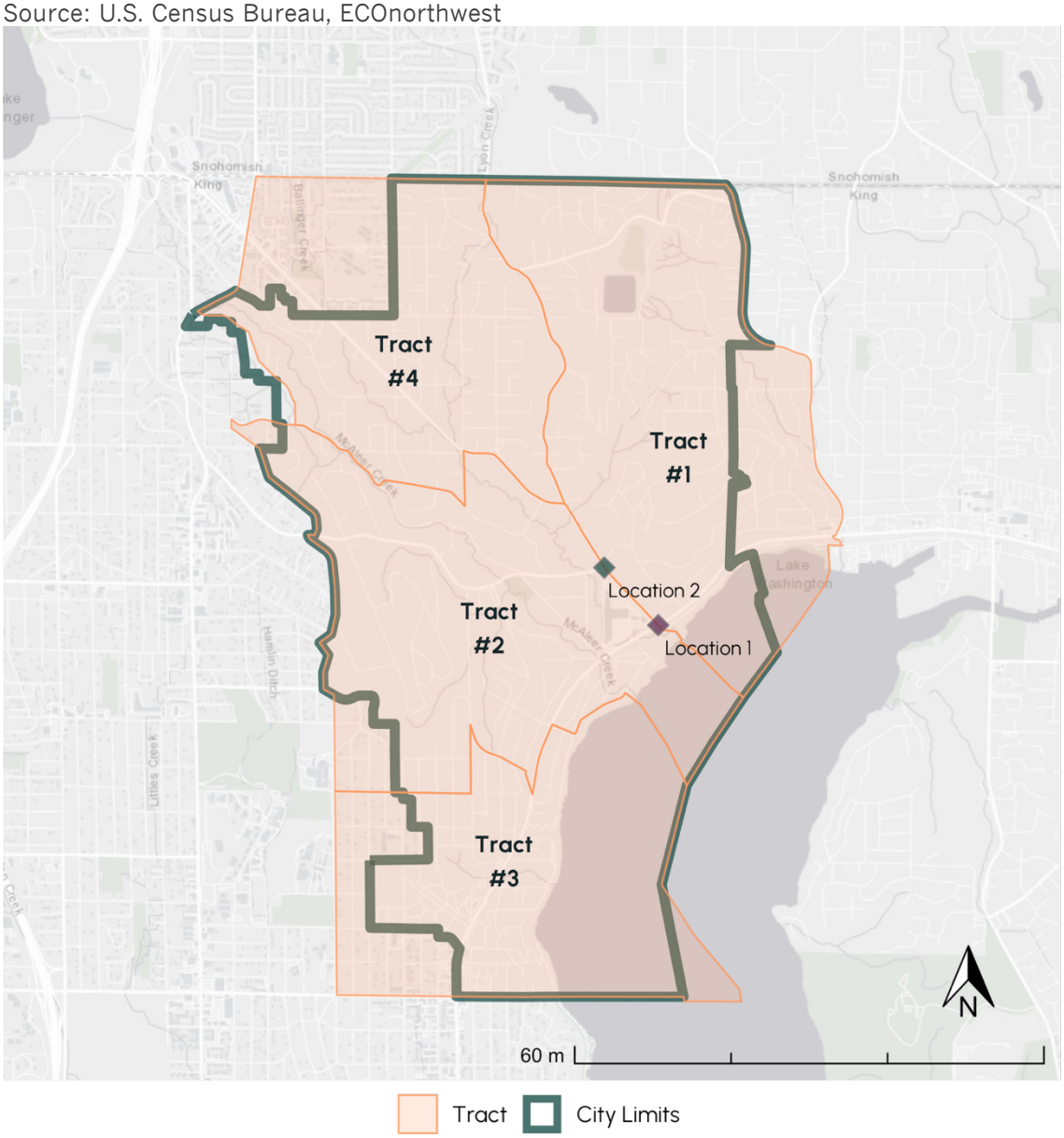
» How will the location of these speed safety cameras benefit or burden those who *use* SR 522 and SR 104?

Current Residents: Introducing a speed safety camera in a neighborhood impacts the residents who live there. Understanding who lives in and/or travels through the corridors can help the City consider who may be most likely to benefit and/or be most burdened by the locations of these new SSCs. To better understand the population surrounding the two corridors, we used data from the U.S. Census Bureau's American Community Survey. The Bothell Way (SR 522) and Ballinger Way (SR 104) corridors together span the majority of Lake Forest Park and fall within four Census tracts, which together encompass nearly the entire city (see **Figure 3**).

[15] Washington Traffic Safety Commission. *Speed Safety Camera Readiness Guide*. 2023.
[16] FEHR & PEERS. *Safe Streets: Town Center Connections*. 2018.

Figure 3: Study Area

Source: U.S. Census Bureau, ECOnorthwest



To strengthen the reliability of the demographic analysis and capture the broader community context, our team combined all four Census tracts into a single study area geography. This combined area provides a representative demographic snapshot of Lake Forest Park as a whole (**Table 1**). ***Because historically marginalized communities make up a smaller proportion of this City's demographic composition, as compared to the County, the demographic characteristics of this neighborhood do not raise any equity-related concerns.***

Table 1: SSC-Location Tract's Demographic Profile (City) Compared to County[17]

Source: 2023 ACS 5-Year, ECOnorthwest

DEMOGRAPHIC CHARACTERISITC	CITY OF LAKE FOREST PARK	KING COUNTY
Race and Ethnicity		
Percent White-Non Hispanic Residents	71.1%	54.3%
Percent BIPOC-Non Hispanic Residents	23.9%	34.8%
Percent Hispanic Residents	5%	10.8%
Households With Children		
Percent Children Under 18	19.4%	19.8%
Wealth and Income		
Poverty Rate	3.6%	8.4%
Median Household Income	$158,868	$122,148
Per Capita Income	$76,213	$71,062
Percent Household with Income under $50,000*	9.8%	19.8%
Percent Household with Income over $200,000*	35.4%	28.3%
Other Socioeconomic Indicators		
Percent Residents on Food Stamps	3.9%	8.2%
Percent Residents with a Bachelor's or Higher	66%	55.9%
Percent Household who Rent	19.2%	43.9%

Based on our current analysis, placing a speed safety camera anywhere along the major highway corridors (Bothell Way/SR 522 or Ballinger Way/SR 104) in Lake Forest Park would have no meaningful impact on who is captured by the cameras in terms of demographic composition. The tracts encompassing the two corridors are demographically similar, and any intersection-level placement along these main thoroughfares would capture roughly the same population of residents traveling through the area. This suggests that, at a citywide scale, ***camera placement along SR 522 and SR 104 is unlikely to introduce disproportionate burdens on specific demographic groups within the City.***

However, it should be noted that placing a camera outside of these major corridors, within surrounding neighborhoods, would have significantly different implications. The residential areas beyond the highways include populations that differ meaningfully in demographic and socioeconomic characteristics. Introducing a camera in these neighborhood locations could therefore have more pronounced equity impacts, influencing who bears the burden of enforcement and who benefits from potential safety improvements.

Furthermore, the primary objective of these Speed Safety Cameras (SSCs) is to reduce vehicle speeds along SR 522 and SR 104, directly benefiting those who live in the surrounding neighborhoods. These corridors serve as important travel routes

[17] Data presented in Table 1 are based on a 5-year average estimate, from 2018-2023 as this helps improves data quality. All estimates have a margin of error. While this margin of error is not reported in Table 1, estimates for the tract that do not meaningfully differ from the city level estimate are flagged.

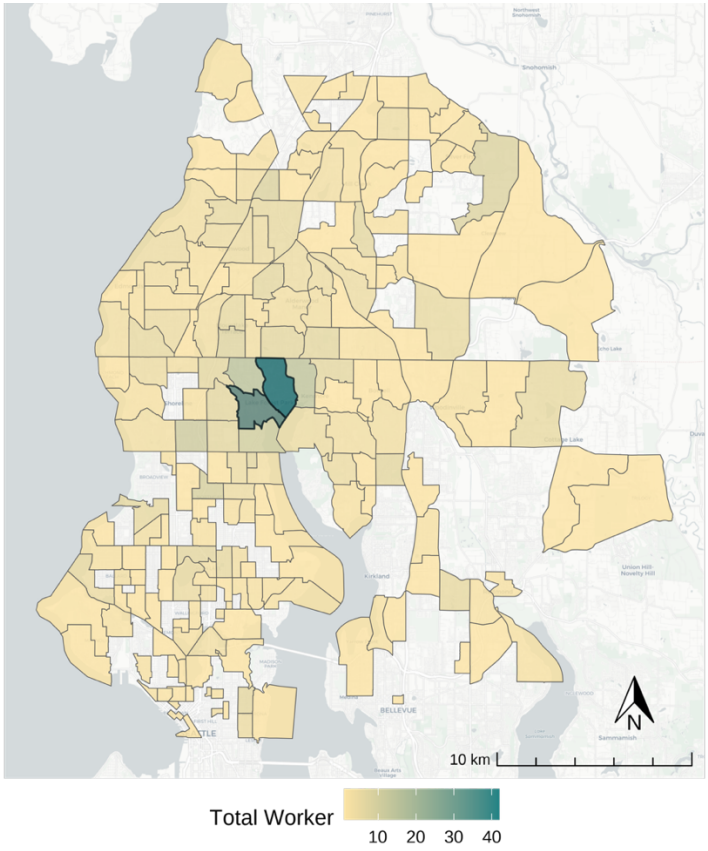
for families who drive, walk, or bike their children to nearby schools. In this way, the ***successful deployment of SSCs would not only improve safety for all travelers but would most likely yield the greatest benefits for local residents, particularly those who rely on these routes for daily activities and school access.***

Commuters: Non-residents of Lake Forest Park are also likely to use SR 522 and SR 104 for commuting purposes. There are myriad reasons why state routes may be used by commuters; however, commuters can be condensed into three main categories: 1) residents of the area traveling to and from their homes, 2) local workers traveling to and from their place of employment, and 3) commuters passing through the area en route to their destinations.

LOCAL WORKERS TRAVELING THROUGH

Figure 4: Map of Study Area Worker Origins within 10 miles of Study Area[18]

Source: 2022 LODES Origin-Destination Data, ECOnorthwest



The U.S. Census Bureau's LEHD Origin-Destination Employment Statistics ("LODES") data suggests the tracts encompassing the City are not major employment hubs in the region, with roughly only 1,051 employees. While many

[18] The U.S. Census Bureau's LEHD Origin-Destination Employment Statistics ("LODES") shows that the study area provided employment for 1051 people in 2022. This same data source reports the demographic profile of workers by tract, which reveals the asymmetry between workers and residents, as reported above. The total number of workers in this tract is low, which can affect the accuracy of these data points.

employees reside in tracts in the immediate vicinity of the study area, a large portion of the workforce travels into the tract from across the Seattle Metropolitan Area (**Figure 4**).

Workers who commute to the study area are racially similar to the residents; however, a larger share of these workers are Hispanic as compared to the City's share of Hispanic residents (5%). Additionally, 46.8% percent of workers from these surrounding tracts earn less than $40k annually. For reference, in 2023, the percent of households within the City with an income of $50,000 or less was 9.8%. While not a perfect comparison, these high-level findings suggest workers who commute to the area are more diverse and lower income than residents who live in the City of Lake Forest Park.

PASS-THROUGH COMMUTING

A better understanding of demographic data on commuting patterns can help the City understand who is commuting through the neighborhood, beyond who works and lives there (**Table 2**). From our analysis, we find that pass-through commuters, who do not work or live in the area, have similar shares of white population, however pass-through commuters tend to be made up of slightly higher percent of Hispanic population than the rest of the city. Additionally, commuters through the city have a relatively lower rate of folks with bachelor's degrees or higher, and are 7% more likely to be renters.

Table 2: Pass-Through Commuter Data[19]

Source: 2022 LODES Origin-Destination Data and 2023 ACS 5-Year, ECOnorthwest

DEMOGRAPHIC CHARACTERISTIC	PASS-THROUGH COMMUTER	WORKER COMMUTER	CITY OF LAKE FOREST PARK
Race and Ethnicity			
Percent White-Non Hispanic Residents	67.3%	71.7%	71.1%
Percent BIPOC-Non Hispanic Residents	24.3%	20.2%	23.9%
Percent Hispanic Residents	8.5%	8.1%	5%
Wealth and Income			
Poverty Rate	4.8%	N/A[20]	3.6%
Low Wage Paying Jobs ($40k)	44%	46.8%	N/A
Percent Household with Income under $50,000*	N/A	N/A	9.8%
Other Socioeconomic Indicators			
Percent Residents with a Bachelor's or Higher	57.0%	N/A	66%
Percent Household who Rent	26.6%	N/A	19.2%

[19] Due to the high computational cost of network analysis, the sample was limited to 5,000 workers residing within 10 miles of the proposed camera locations but employed outside the study area tracts. The analysis identified 127 probable commuter routes intersecting the proposed camera sites, originating from 37 unique block groups. Data were drawn from the 17 tracts containing these block groups and aggregated as presented in the table. None of the aggregated estimates exhibited unusually high margins of error.

[20] "N/A" means the value is either not available or has been suppressed due to lack of statistical reliability.

City staff observed that commuters are increasingly aiming to avoid a toll on Washington State Route 520, an east-west thoroughfare that connects the east side to Interstate 5. This will likely result in shifting traffic patterns within the surrounding network, including potential increase in commuter use of SR 522. This behavior appears influenced by the ongoing construction and opening of new light rail stations, which are expected to provide alternative routes and modes of travel. ***Given 1) the use of SR 522 as an alternative to SR 520, and 2) the greater share of Hispanic and lower-income workers and non-workers in these surrounding areas who are likely to commute through Lake Forest Park, there is a potential for a greater share of Hispanic and lower-wage earning commuters to be disproportionately impacted by the SSCs placement and speed zone enforcement.***

During the Deployment of Speed Camera

» **Will the City of Lake Forest Park *deploy* the speed cameras on Bothell Way (SR 522) and Ballinger Way (SR 104) in an equitable manner?**

Signage: Washington state law requires the provisions for public notice and signage, including the clear marking of the SSC's location at least 30 days prior to the activation of the traffic camera.[21] ***The installation of speed safety cameras align with best practices encouraging safe speeds by providing signage that includes flashing warnings to reinforce speed awareness, as well as signage that indicates the use of cameras.[22]***

Additional Equity Opportunity: Relatedly, in addition to notifying and displaying signage of the existing cameras, additional dynamic signage that display driver speeds have been shown to reduce ticketing by 80% and encourage immediate self-correction before entering enforcement zones.[23]

Issued Warnings: In addition to notifying drivers about new camera installations, a best practice is to include a ***grace period after activation, typically around 30 days, during which non-accident violations result in warnings rather than fines.[24]*** Some programs also issue warnings for first-time violators to promote awareness and encourage voluntary compliance.[25] When the cameras near Brookside Elementary became active on June 2, 2024, the City of Lake Forest Park ***followed this***

[21] RCW 46.63.220
[22] Lake Forest Park, Wash., Ordinance No. 1283-23, "An Ordinance of the City Council of the City of Lake Forest Park, Washington Amending Section 10.06.010 of the Lake Forest Park Municipal Code, Automated Traffic Cameras – Detection of Violations Restrictions, Providing for Severability and Providing an Effective Date," adopted November 9, 2023, published November 15, 2023
[23] Johnson, Shanelle. 2024. Caution: We're Driving the Wrong Way on Automated Traffic Enforcement. Fines and Fees Justice Center.
[24] Washington Traffic Safety Commission. *Speed Safety Camera Readiness Guide*. 2023.
[25] Smith, Tiffany and Leah Shahum. 2024. Fair Warnings: Recommendations to Promote Equity in Speed Safety Camera Programs. Vision Zero Network. https://visionzeronetwork.org/wp-content/uploads/2024/12/Fair-Warnings_FINAL.pdf

approach, providing a 30-day warning period for all automated traffic safety cameras, including those in school zones, before issuing citations.[26]

Additional Equity Opportunity: Codify the 30-day warning period into law to ensure all future camera installations align with the best practice of a grace period for non-accident violations.

Speed Enforcement Threshold:
The City has formally requested a speed limit reduction from 40 mph to 35 mph for SR 522, from 40 mph to 25 mph for SR 104 north of 35th Avenue NE, and from 30 mph to 25 mph for SR 104 south of 35th Avenue NE. Existing cameras within City of Lake Forest Park are currently set at 6 mph threshold. Given the lower speeds and pedestrian traffic on SR 104, this corridor would also be set at the 6 mph threshold. However, for SR 522, the City recommends setting the threshold at 9 mph for the first 6-months, resulting in a warning, and then lowering the threshold to 6 mph, resulting in a citation. Council will decide upon implementation. ***This enforcement threshold of 6 mph for SR 104 and 9 mph for SR 522 aligns with the National Highway Traffic Safety Administration (NHTSA) recommendation of a threshold of a maximum of 11 mph on most roads, and a minimum of 6 mph in school zones or other roads with lower speed limits or where pedestrians and children are likely to be present.[27]***

Due Process: Washington state law also requires that a notice of speed infraction be mailed to the registered owner within 14 days of the violation. SSC violation fines are treated like a parking ticket and do not go on a driver's record. The City follows best practice by adopting a graduated fine model with the base rate of $145 and the fine increasing to $290 for recidivism and speeds exceeding 31 mph in school zones. ***Additionally, the City of Lake Forest Park court system has a history of considering equitable approaches to reduce monetary penalties. On June 6th, 2024, the City complied with HB 2384, allowing recipients of state public assistance to request 50% reduced penalties.[28]***

Additional Equity Opportunity: Prioritizing non-financial sanctions offers supportive interventions to change driver behavior. One alternative approach Lake Forest Park SSC program may consider is requiring low-cost, low barrier driver education trainings for the first offense.[29] The use of broad qualifying community service

[26] Clasen, Chris. 2024. Brookside Elementary traffic cams to be monitoring speed 24/7 this June. The LFP Town Crier.
[27] Washington Traffic Safety Commission. Speed Safety Camera Readiness Guide. 2023.
[28] Washington State. Final Bill Report ESHB 2384. 2024.
[29] **Johnson, Shanelle. 2024. Caution: We're Driving the Wrong Way on Automated Traffic Enforcement. Fines and Fees Justice Center.** https://finesandfeesjusticecenter.org/wp-content/uploads/2023/12/Driving-the-Wrong-Way-5.pdf

instead of monetary fines also provides in an equitable alternative for assisting in the affordability of fines or payments.[30]

Restorative Justice Practices: Restorative justice transportation practices aim to focus on people, relationships, and closure where possible. These practices offer alternative restorative justice programs as an alternative to conventional punitive tools (e.g., fines or jail time), to elevate healing practices that afford offenders the opportunity to learn from their mistakes and avoid repeating them.[31]
These practices offer restorative justice programs as an alternative to conventional punitive tools (e.g., fines or jail time), which afford offenders the opportunity to learn from their mistakes and avoid repeating them.[32]

Administrative Capacity: It is important for the City to have sufficient staff capacity to deploy, monitor, and evaluate the SSC program.[33] Utilizing the new revenue from the cameras on 178th, the city has hired additional court and PD staff to process the violations. Additionally, a tiered system has been established to add additional staff as violations increase. The City is also increasing the hours in the upcoming renewal of the judge's contract to handle the additional caseload. These efforts in increasing staff capacity aim to decrease the current wait time of 120 days for hearing traffic camera hearing requests.[34] ***Although speeding violations are expected to decline over time, an initial surge may occur. Expanding the City's capacity will support fair enforcement and enable continued evaluation of the program's effectiveness.***

Protect Data Privacy: As a response to concerns about surveillance and the protection of driver privacy, there are emerging best practices related to SSCs around intentionally moving these programs out of the purview of police departments. ***RCW 46.63.170(2) already requires that automated enforcement systems be designed to photograph only license plates and that the photos and electronic images captured by a camera 1) may not be publicly available, 2), can only be used for the enforcement of traffic infractions, and 3) may not be part of the registered owner's driving record.[35]***

[30] Ibid
[31] Transportation Alternatives. "A Restorative Justice Approach to Traffic Violence." n.d.
[32] Ibid.
[33] Packer, Ryan. 2022. "Seattle's Traffic Camera Funds Earmarked for Statewide 'Capacity Building' Efforts." The Urbanist.
[34] City of Lake Forest Park, *"Photo Enforcement Program,"* section "Photo Enforcement Infraction? Please read!," City of Lake Forest Park, accessed October 14, 2025, https://cityoflfp.gov/433/Photo-Enforcement-Program.
[35] Parsons, Susannah. 2021. "Can Automated Speed Safety Systems Advance Racial and Economic Equity." SPUR News.

After Speed Camera Placement

» Will the evaluation of outcomes of the speed cameras be equitable?

Program Evaluation: Washington state law requires all cities who deploy an SSC program to provide annual reports on the number of traffic collisions and notices of infraction issued at the traffic camera locations, in addition to the revenue received from fines and the distribution of such revenue. ***This required reporting aligns with best practices of providing public-facing updates on the impact of SSC program, including; 1) analysis of vehicle speeds, 2) crash statistics in SSC locations and jurisdiction-wide, 3) changes in public awareness and acceptance, and 4) demographic data (e.g., race/ethnicity, income, etc.) on drivers receiving citations and patterns regarding times and days when citations are issued.***[36]

Require Community Feedback: Ensuring the community is kept informed on the impact of these speed cameras in decreasing fatalities and increasing safety is considered best practice and is required by Washington state law (See Program Evaluation).[37] ***Alongside this best practice of keeping community informed, it is also important to provide avenues for community members to share feedback on their experience and evaluative perceptions on the effectiveness of the SSC program.[38] The City does not currently have a method of receiving and incorporating feedback listed on their site specifically regarding the SCC program.***

Program Duration: Speed safety cameras are considered a short-term solution to a specific traffic safety problem. Therefore, when speed cameras aren't achieving the goals of the program (i.e. slowed speeds), it is likely not the right tool in that situation and should be exchanged for alternative tools (e.g., in-person enforcement, signage, striping, design changes, etc.). ***The City of Lake Forest has not established a timeframe (e.g., after a year or two of the installation of the SSCs), to evaluate the effectiveness of the program and determine a program duration that makes the most sense for the impacted area.***[39]

» Will the generation and distribution of SSC revenue be done equitably?

Revenue Generation: To disincentivize the unnecessary lengthening of a SSC program duration as a means for revenue generation, particularly in the case of a third party/private party manufacturer or vendor, ***RCW 46.63.170(1)(k) requires that the compensation paid to the manufacturer or vendor of the equipment be solely based upon the value of the equipment and services provided, and not a portion of the fine or civil penalty imposed or the revenue generated by the equipment.***[40]

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[36] Washington Traffic Safety Commission. *Speed Safety Camera Readiness Guide*. 2023.
[37] Ibid.
[38] Ibid.
[39] Ibid.
[40] RCW 46.63.170(1)(k).

Revenue Distribution: In an effective SSC program, cities should anticipate that revenue in each camera location will decline as driver speeds decrease. However, regarding the revenue generated, there is equity concern in the use of cameras as a means of revenue generation for the City. Given the current model, the City may consider the revenue generated and placed into the traffic action fund for use in drivers' education programs for first time offenders.[41] ***Washington state law requires cities to use funds from traffic cameras for traffic safety improvements after covering operating costs. This change was implemented in 2025 and prevents cities from simply depositing this revenue into their general fund, shifting the focus to specific safety projects like street repairs and enforcement campaigns.***[42]

[41] Buddupalli, Aravind and Muciolo, Livia. 2022. "Public Safety or Speed Traps? The Conflicts of Interest Behind Fines and Fees." Tax Policy Center. Urban Institute & Brookings Institution., See also, Wilson, Kea. 2022. "Analysis When Speed Cameras Are Racist." Street Blog USA.

[42] RCW 46.63.220.

4. Conclusion (Equity Score)

Overall Takeaway

ECOnorthwest prepares this equity analysis report for the City of Lake Forest Park as required by the 2023 Revised Code of Washington RCW 46.63.170(1)(d)(ii).[43] ECOnorthwest's team analyzed the equity impact of installing automated speed cameras along SR 522 and SR 104. A total of 16 equity targets were considered regarding the decision-making, placement, deployment, and evaluation of Lake Forest Park's proposed SSCs.

Of these 16 equity targets, most were met (12), one target elevated concerns, and another three are key opportunities for the city to expand its SSC's equitable impact.

Analysis Score

12 Equity Targets Met

1 Equity Target Warnings

3 Equity Target Opportunities

Equity Impact Analysis Score (15/16)

ECOnorthwest equity impact analysis finds the placement of safety cameras by the City of Lake Forest Park along SR 522 and SR 104 have the potential to bring forth equitable impacts on its surrounding community's livability, accessibility, economics, education, and environmental health. However, the City has important questions to consider and address regarding:

1) Ensuring avenues for continued community input and transparency.
2) Resolving possible disproportionate impact on non-resident commuter drivers.
3) Tracking the impact of these speed safety cameras on reducing traffic crashes and/or speed violations in the area.

[43] RCW 46.63.170(1)(k).

Resolution 25-2050 Speed and Equity Studies

Final Audit Report 2025-12-16

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