From:
 Tom McCormick

 To:
 Plancom

Cc: Lisa Basher: Rachael Markle; Steve Szafran; Debbie Tarry; Doris McConnell; Keith McGlashan; Jesse Salomon; Chris Roberts; Keith Scully

Subject: Comments re 2016 Comprehensive Plan Docket

Date: Wednesday, February 17, 2016 1:35:43 PM

Attachments: PastedGraphic-4.png
PastedGraphic-3.png

To: Planning Commissioners

The 2016 Comprehensive Plan Docket is on the agenda for your Feb. 18, 2016 meeting. There are eleven (11) privately-initiated amendments and four (4) city-initiated amendments that you will be considering for inclusion on the Docket. You will make a recommendation to the City Council, which will make the final decision as to which amendments to include on the Docket. On Feb. 18, you will not be deciding on whether to recommend approval of the proposed amendments. You will only be voting only on whether the proposed amendments make enough sense to put them on the docket for future consideration.

I submitted two of the privately-initiated amendments. Unfortunately, because I am out of the country this week, I will not be able to attend the Feb. 18 meeting, to voice my comments in public. Could you possibly leave the record open and continue to accept in-person public comments on the Docket at your March meeting? This will give me and possibly others who cannot attend the Feb. 18 meeting an opportunity to present in-person public comments.

Meanwhile, there are two points that I would like to make now based on my quick review of the Staff Report for the Feb. 18 meeting, prepared by Rachael Markle and Steven Szafran. I will voice other comments in March. The first comment below pertains to an amendment submitted not by me, but by Save Richmond Beach. The second comment pertains to an amendment submitted by me.

I.

Amendment #5 (Applicant: Save Richmond Beach) would amend the Point Wells Subarea Plan to read in part as follows: "However, if a public access road is constructed that connects the Point Wells Island to the Town of Woodway, then the FSAA [(Future Service and Annexation Area)] shall be reduced in scope to be no greater than the area west of the Burlington Northern Santa Fe right-of-way."

The staff report says that "Staff believes this proposed Comprehensive Plan Amendment is premature since a second access road leading to the Town of Woodway is uncertain. ... Staff recommends this proposed amendment not be placed on the 2016 Docket."

Staff's comments miss the point. Amendment #5 says the IF there's a second road THEN the FSAA should be reduced in size. Staff's comments fail to address the conditional nature of Amendment #5. Apparently, Staff does not think it's appropriate to amend the Subarea Plan until such time that a second road is contracted. That's silly. The Subarea Plan sets forth the City's policy should certain events occur. Indeed, the entire Subarea Plan is conditional in nature. And at a detailed level within the Subarea Plan, there are examples of conditional provisions of the sort that Staff seems reluctant to support. Here's one example of a conditional provision that's already in the Subarea Plan:

"If a potential alternative access scenario is identified, it should be added to the corridor study. The Study should also evaluate and identify expanded bicycle and pedestrian safety and mobility investments, and identify "context sensitive design" treatments as appropriate for intersections, road segments, block faces, crosswalks and walkways in the study area with emphasis on Richmond Beach Road and Richmond Beach Drive and other routes such as 20th Ave. NW, 23rd Place NW, NW 204th Street and other streets that may be impacted if a secondary road is opened through Woodway."

Because Staff has failed to articulate a legitimate reason for its objection to Amendment #5, I respectfully request that you vote to recommend Amendment #5 for inclusion on the 2016 Comprehensive Plan Docket.

II.

Amendment #6 (Applicant: McCormick) would amend the Point Wells Subarea Plan to read in part as follows (the text below is the exact text that I submitted for the 2016 docket):

"Revise the final two sentences in the paragraph immediately preceding Policy PW-11 to read substantially as follows: "...
The City's traffic study completed in 2009 shows that if more than 8,250 vehicle trips a day enter the City's road network from/to Point Wells, it would result in a level of service "F" or worse at a number of City intersections. This would be an unacceptable impact, exceeding the City's adopted level of service "D". Further, a road capacity analysis completed in 2015 shows that if Richmond Beach Road is re-striped to become a 3-lane road as has been planned for years and is included in the City's 2016-2021 Capital Improvement Plan, then if more than 5.000 [see the NOTE below] new vehicle trips a day enter the City's road network going from/to Point Wells, it will result in a total traffic volume on Richmond Beach Road at one or more points that exceeds the City's 0.90 V/C supplemental level of service for the road. This would be unacceptable, resulting in significant adverse environmental impacts that are not capable of being mitigated (the road's right-of-way is insufficient to permit the road to be widened to increase capacity)."

[NOTE: While 5,000 new vehicle trips per day is included in the above text, the exact number of new vehicle trips per day is subject to confirmation by City Staff, taking into account the level of non-Point Wells traffic projected to exist in 2035 or whatever later date that full buildout is expected to be completed. City Staff possibly could determine that, after Richmond Beach Road is re-striped to become a 3-lane road, even a single additional trip per day to/from Point Wells could result in a total traffic volume on Richmond Beach Road at one or more points that exceeds the City's 0.90 V/C supplemental level of service for the road. See the attached worksheet showing that under the City's 0.90 V/C standard, there is no spare capacity on Richmond Beach Road between Dayton and 3rd Avenue NW.]

Revise Policy PW-12 to read substantially as follows: "In view of the fact that Richmond Beach Drive between NW 199th St. and NW 205th St. is a local road with no opportunities for alternative access to dozens of homes in Shoreline and Woodway, the City designates this as a local street with a maximum capacity of 4,000 vehicle trips per day. Unless and until 1) Snohomish County and/or the owner of the Point Wells Urban Center can provide to the City the Transportation Corridor Study and Mitigation Plan called for in Policy PW-9, and 2) sources of financing for necessary mitigation are committed, the City should not consider reclassifying this road segment. As a separate limitation in addition to the forgoing, the maximum number of new vehicle trips a day entering the City's road network from/to Point Wells at full buildout shall not exceed the spare capacity of Richmond Beach Road under the City's 0.90 V/C standard based on Richmond Beach Road being a 3-lane road (the 0.90 V/C standard may not be exceeded at any location along Richmond Beach Road)."

As already noted, the above text is the exact text that I submitted for the 2016 Comprehensive Plan Docket. The Staff Report (on page 7) mistakenly adds certain other text and deletes certain text, which is very confusing and is not what I submitted. Please consider only the above text as I have submitted it.

Staff appears to recognize the merits of including my Amendment #6 on the 2016 Comprehensive Plan Docket, but wants to amend my text. I'm not sure whether it's procedurally appropriate for Staff to recommend alternate language at this stage (after Dec. 31), but even assuming that Staff can do that, I wish to voice my strong objections to Staff's suggested replacement language, which is factually incorrect in at least one respect, and which fails to accomplish the intent of what I have submitted.

A. Factually Incorrect

Staff's suggested replacement language says in part that, "The City's 2016-2021 CIP calls for Richmond Beach Rd west of 3rd Ave NW to be restriped to one lane in each direction plus a center turn lane." Fact check: The City's 2016-2021 CIP calls for Richmond Beach Rd west of Dayton Ave. N (not, as Staff says, west of 3rd Ave NW) to be restriped to one lane in each direction plus a center turn lane. See the snippet at the end of this email, Attachment #1, which comes from page 383 of the recently adopted 2016 budget adding \$200,000 to the CIP to re-stripe Richmond Beach Road into a 3-lane road west of Dayton. It targets the work to be done in 2017. Access it at http://www.shorelinewa.gov/home/showdocument?id=22237.

B. Staff's replacement language fails to follow the intent of my proposed amendment

The Staff Report says that:

"Since the City does not know the amount of trips being proposed nor do we know the amount of trips Snohomish County would be willing to accept, it may be better to strike hypothetical specifics and instead provide language about the Capital Improvement Plan (CIP) plan to restripe Richmond Beach Road to a 3-lane roadway and include that, as with any development, additional trips added to the system should not deviate from the LOS standards resulting from our planned future roadway."

Here's the replacement text that Staff wants, which would override my proposed text:

Historically, mobility and accessibility in Richmond Beach and adjacent communities has been dominated by the single occupancy vehicle. Provision of bicycle and pedestrian facilities has been limited because retrofitting an existing road network with these facilities is an expensive undertaking. The Richmond Beach Road corridor is served by limited Metro bus service and is beyond a reasonable walking distance from potential development within Point Wells. Though rail service to a station in Richmond Beach was evaluated by Sound Transit, no service is envisioned in the transit agency's adopted 20 year plan. Improved transit, bicycle and pedestrian mobility is a long-term policy objective, but the majority of trips in the area will likely continue to be by automobiles utilizing the road network. The City's traffic study completed in 2009 shows that if more than 8,250 vehicle trips a day enter the City's road network from Point Wells, it would result in a level of service "P" or worse at a number of City intersections. This would be an unacceptable impact. The City's 2016-2021 CIP calls for Richmond Beach Rd west of 3rd Ave NW to be restriped to one lane in each direction plus a center turn lane. Future development should take into account this planned layout; additional trips that exceed the City's LOS standards would be an unacceptable impact.

Here is why Staff's replacement language is unacceptable and must be ignored:

- As noted above, the City's 2016-2021 CIP calls for Richmond Beach Rd west of Dayton Ave. N to be restriped to one lane in each direction plus a center turn lane, NOT merely west of 3rd Ave NW, as Staff's replacement text says. This is very significant, because with three lanes with of Dayton, there will be no spare capacity for Point Wells traffic under the City's adopted 0.90 V/C standard. If three lanes go to 3rd only, then there might be some spare capacity. See the attached spreadsheet, Attachment #2, that the City sent to me in 2015 pursuant to a public records request; the City also provided the spreadsheet to Snohomish County (the annotations were added by me).
- Staff's replacement language says, future development should take into account that Richmond Beach Road will be three lanes, and "additional trips that exceed the City's LOS standards would be an unacceptable impact." My proposal intentionally goes further and deserves to be put on the 2016 docket. My proposal specifically incorporates the City's adopted 0.90 V/C standard; it doesn't merely refer to the City's LOS standards in general. This difference is significant because with my proposal the City will be articulating its position that the 0.90 V/C standard will apply to Richmond Beach Road, and the City will not endorse an alternative standard like a 1.10 V/C standard that would allow greater traffic volumes than a 0.90 V/C standard would allow (note: in two instances the City has made an exception to the 0.90 V/C standard and adopted a 1.10 V/C standard in its place (15th Ave NE and Dayton Ave N) my proposed language would not allow this to happen for Richmond Beach Road). Another objection to staff's replacement language is this: while it mentions that exceeding LOS standards would be unacceptable, it drops my text that says that exceeding the 0.90 V/C standard would result "in significant adverse

environmental impacts that are not capable of being mitigated (the road's right-of-way is insufficient to permit the road to be widened to increase capacity)." It is important that the City articulate the view that the impacts are incapable of being mitigated.

- Staff's replacement language wrongly deletes information about the City's 2009 traffic study and how LOS "F" would result at a number of intersections if 8,250 daily trips to/from Point Wells. This language should not be deleted. It has ongoing relevance.
- Staff thinks that its replacement language should be on the docket because "the City does not know the amount of trips being proposed nor do we know the amount of trips Snohomish County would be willing to accept." It is irrelevant whether the City knows the exact number of trips that might go to/from Point Wells (note: though the City's knowledge is irrelevant, it's clear that the City knows more than its Staff Report suggests: the City knows that the trips to/from Point Wells might be as high as 11,587, per the 2013 Memorandum of Understanding, or possibly higher if BSRE gets its way; also, reports from DKS, the City's consultant, shed light on the number of trips). What is relevant is this: the City knows that there will be little spare traffic capacity for Richmond Beach Road once it is converted to three lanes. While the City may not know the exact amount of traffic that eventually my flow to/from Point Wells, it knows the spare capacity of Richmond Beach Road and that Point Wells traffic will exceed that capacity. Last year, the City studied the capacity of a 3-lane Richmond Beach Road and it knows there is little spare capacity. See the attached spreadsheet Attachment #2, that the City sent to me in 2015 pursuant to a public records request; the City also provided the spreadsheet to Snohomish County (the annotations were added by me).

My proposed amendment will, when taking into account the City's spare capacity study, articulate clearly that under the City's 0.90 V/C standard, there will be little or no spare capacity for Point Wells traffic, and this result would be a significant adverse impact incapable of being mitigated. The City should call it like it is.

Finally, my proposed amendment and the accompanying note mention 5,000 new vehicle trips per day. I would not object to removing the reference to 5,000 new vehicle trips per day, and replacing it with the following edited text: "Further, a road capacity analysis completed in 2015 shows that if Richmond Beach Road is re-striped to become a 3-lane road as has been planned for years and is included in the City's 2016-2021 Capital Improvement Plan, then the City will take all steps necessary or appropriate to ensure that traffic entering if more than 5,000 [see the NOTE below] new vehicle trips a day enter the City's road network going from/to Point Wells, it will not result in a total traffic volume on Richmond Beach Road at one or more points that exceeds the City's 0.90 V/C supplemental level of service for the road. This would be unacceptable, resulting in significant adverse environmental impacts that are not capable of being mitigated (the road's right-of-way is insufficient to permit the road to be widened to increase capacity)."

Thank you.

Tom McCormick

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Attachment #1 of 2: Attached is the page from the recently adopted 2016 budget adding \$200k to the CIP to re-stripe Richmond Beach Road into a 3-lane road west of Dayton. It targets the work to be done in 2017. Accessed it at http://www.shorelinewa.gov/home/showdocument? id=22237

RICHMOND BEACH RD RECHANNELIZATION





Project Description:

This project will re-channelize Richmond Beach Rd/NW 195th St/NW 196th St from 24th Ave NW to Dayton Ave N from four lanes to one lane in each direction plus a center turn lane. The primary goal of this project is to improve driver, pedestrian, and bicyclist safety and mobility. Re-channelization also provides the ability to implement on-street bicycle lanes as well as pedestrian refuge space for pedestrians crossing the street between controlled intersections.

Service Impact:

This project will improve the safety and mobility of pedestrians, drivers, and bicyclists along the corridor. This project also enhances the livability of adjacent neighborhoods.

Changes from 2015-2020 CIP: New project.

RICHMOND BEACH RE-CHANN	ELIZATION											
ORGKEY: 2916341	J.L.# ST269800											
PHASE		PRIOR-YRS	2015CB	2015E	2016E	2017E	2018E	2019E	2020E	2021E	6-YEAR TOTAL	TOTAL PROJECT
PROJECT EXPENDITURES:												
1-PROJECT ADMINISTRATION						50,000					50,000	50,000
2-REAL ESTATE ACQUISITION												
3-CONSTRUCTION						150,000					150,000	150,000
TOTAL PROJECT EXPENDITURE	S					200,000					200,000	200,000
REVENUE SOURCES:												
ROADS CAPITAL FUND						200,000					200,000	200,000
TOTAL PROJECT REVENUES						200,000					200,000	200,000
		ELIGIBLE (Y/N)										
1% FOR PUBLIC ART ELIGIBLE (Y/N)	Y				1,500						

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Attachment #2 of 2: The City sent me the attached spreadsheet in 2015 pursuant to a public records request; the City also provided the spreadsheet to Snohomish County (the annotations were added by me).

Location	Existing PM volume - scaled up to 2030 numbers from DEA Synchro Model	Directional Capacity ¹	Spare Capacity until .90 v/c reached (Peak Hour Trips)	Spare Capacity until 1.10 v/c reached (Peak Hour Trips) ³	
Richmond Beach Drive / n-o 196th	29	700	601	741	
N Richmond Beach Rd / w-o 8th (3 lane)	623	960	241	433	
² N Richmond Beach Rd / 3rd to 8th (4 lane)	833	1600	607	927	
N Richmond Beach Rd / 3rd to 8th (3 lane)	833	960	31	223	
² N Richmond Beach Rd / Dayton to 3rd (4 lane)	973	1600	467	787	
N Richmond Beach Rd / Dayton to 3rd (3 lane)	973	960	-109	83	

¹ Capacity for Richmond Beach Drive is based on a mitigated 2 lane roadway. All others come from Shoreline Model.

To comply with the City's 0.90 V/C ratio:

- 1. If Richmond Beach Road is 3 lanes to Dayton, then no new trips to/from Point Wells could be allowed.
- 2. If Richmond Beach Road is 3 lanes only to 3rd Ave NW, then the maximum new trips to/from Point Wells would be 575 700 ADTs (roughly = 31 peak PM trips from column 4 of above table).
- 3. If Richmond Beach Road is 3 lanes only to 8th Ave NW, then the maximum new trips to/from Point Wells would be 4,600 5,600 ADTs (roughly = 241 peak PM trips from column 4 of above table). [City staff has advised me that roughly speaking these numbers are a fair estimation.]

² The City of Shoreline has included a project in the 2015 - 2020 CIP to convert Richmond Beach Road (24th Ave NW to Dayton Ave N from a 4 lane to a 3 lane section for improved driver, pedestrian and bicyclist safety & mobility.

^{3.90} is the City of Shoreline standard v/c ratio. The City has excepted this standard to a maximum of 1.10 for street segments.