

From: [Tom McCormick](#)
To: [Plancom](#)
Cc: [Jack Malek](#); [William Montero](#); [Steve Szafran](#); [Lisa Basher](#); [Tom Mailhot](#); [Jack Malek 206-498-2189](#); [Bill Montero](#); [Jerry Patterson](#); [Bill Willard](#); [John John](#); [Tom McCormick](#)
Subject: Re: Comp Plan Docket items
Date: Thursday, April 21, 2016 10:41:26 AM
Attachments: [PastedGraphic-3.png](#)

Planning Commissioners:

I am very disappointed that the flawed and misleading 2/18/2016 Staff Report has not been corrected. The 4/21/2016 Staff Report for tonight's meeting has the same flaws as the original Staff Report regarding the outstanding Comp Plan Docket items.

Staff is well aware of the Staff Report's inaccuracies. I emailed some of my concerns to Staff and the Planning Commission on February 17. Further, as evidenced in the minutes to the March 17 Planning Commission meeting, I again brought the Staff Report's inaccuracies to the attention of Staff and the Planning commission on March 17. Staff was specifically asked to correct the Staff Report, but it didn't do so.

There simply is no excuse for Staff's failure to correct the Staff Report. Perhaps Staff wishes to intentionally confuse the Planning Commission, leaving uncertainty about what the Planning Commission will be voting on tonight?

To all Planning Commissioners: Please vote tonight to recommend that proposed Amendments #5, #6, #7, #8, #9 and #10 all be placed on the 2016 docket.

I.

Regarding **Amendment #6**, the following text is what was submitted and this text should be voted for, not what is in the Staff Report:

"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.]"

Staff offers the following weak objection to the above language: "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" I disagree. The number of trips being proposed or what might be acceptable to Snohomish County is irrelevant (note: it is worth mentioning that the City's 2013 MOU with BSRE sets a limit of 11,587 ADTs). The only thing that is relevant for the Comprehensive Plan is how much traffic our roads can handle. The proposed amendment addresses the capacity of our roads. Importantly, a City-commissioned study (see attached chart) shows that new traffic from Point Wells will cause a failure of the City's 0.90 V/C supplemental level of service as follows, depending on how much of Richmond Beach Road is re-striped to 3 lanes:

1. If Richmond Beach Road is re-stripped from Puget Sound to 8th Ave NW, then 241 new peak PM trips (which translates to approximately 5,000 average daily trips (ADTs)) will cause a failure of the City's 0.90 V/C supplemental level of service.
2. If Richmond Beach Road is re-stripped from Puget Sound to 3rd Ave NW, then just 31 new peak PM trips (which translates to approximately 650 average daily trips (ADTs)) will cause a failure of the City's 0.90 V/C supplemental level of service.
3. If Richmond Beach Road is re-stripped from Puget Sound to Dayton Ave N, as per what is planned in the City's 2016-2021 CIP, then any additional peak PM trips will cause a failure of the City's 0.90 V/C supplemental level of service.

Staff has offered some vague alternative language that not only disregards the results of its commissioned study (see above, and the attached chart), but also disregards the City's 0.90 V/C supplemental level of service. Proposed amendments #6 and #7 specifically incorporate the City's 0.90 V/C supplemental level of service. We want to ensure that the City follows its 0.90 V/C supplemental level of service, and we want to restrict the City from adopting an alternative 1.10 V/C supplemental level of service as the City has done for a couple of other City streets (note: from documents we have received in response to public records requests, we are aware and alarmed that the City has contemplated the possible use of a 1.10 V/C supplemental level of service for Richmond Beach Road).

II.

In contrast to proposed Amendment #6 which revises the introductory text to Policy PW-11, and not the Policy itself, it is significant legally that proposed **Amendment #7** revises the text of Policy PW-12, not just the introductory text. Proposed Amendment #7 amends reads as follows:

"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)."

Staff believes that the recommended proposed language in Amendment #6 covers the concerns in Amendment #7. Therefore, Staff recommends that this proposed amendment not be placed on the 2016 Comprehensive Plan Docket. I disagree. As noted above, Amendment #6 does not amend any Policy; it only amends introductory text. Amendment #7 is needed because, unlike Amendment #6, it amends a Policy—it amends Policy PW-12. Further, Amendment #7 is needed because it contains an important clarifying parenthetical: the 0.90 V/C standard may not be exceeded at any location along Richmond Beach Road.

III.

I am very concerned about Staff's cavalier attitude towards amendments proposed by the public—all of the public's amendments, not just the two above. Staff complains that the public's proposals would require significant study efforts which will take considerable staff resources and budget, all to address a single development (Point Wells) that may or may not move forward. Hmm. If that is so, then why did Staff ever study and prepare the Point Wells subarea plan in the first place, given that Staff (and the Planning Commission and the City Council) knew that the Point Wells development may or may not move forward? And objecting to a proposal merely because the proposal might take staff resources is without merit. It is a matter of allocating resources to concerns that the public, the Planning Commission and the City Council deems important.

As to other amendments, like proposed Amendment #8 ("Adopt Level of Service (LOS) D with no through

movement less than E at the signalized intersections on arterials and unsignalized intersecting arterials within the city as the level of service standard”), Staff’s objection that a change to our concurrency model and traffic impact fees would affect all development in general fails to appreciate that this is exactly what is desired. Level of Service standards and the concurrency model and traffic impact fees can be revised at any time by the City Council. For example, last month the City Council declared that Traffic Impact Fees will no longer apply to small businesses, at least through 2018. Changes can be made at any time. It’s okay that staff resources may be needed to study the changes.

Thank you.

Tom McCormick

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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	667	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.

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 2 street segments.

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.]

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On Apr 6, 2016, at 8:48 AM, Lisa Basher <lbasher@shorelinewa.gov> wrote:

Thank you for your inquiry.

The Comp Plan Docket Has been rescheduled for April 21st. I recall your comment about the inaccuracies and will forward your suggestions to Steve Szafran to make the changes to his staff report prior to that meeting.

Thank you,

Lisa Basher

From: Tom McCormick [<mailto:tommccormick@mac.com>]

Sent: Wednesday, April 06, 2016 8:39 AM

To: Lisa Basher

Cc: Jack Malek; William Montero; Steve Szafran

Subject: Re: Comp Plan Docket items

Lisa, what's the status of the five remaining comp plan docket items? Also, is the Staff Report being corrected to address the inaccuracies that I raised at the March 17 meeting (see the minutes)?

Thank you.

Tom McCormick

On Mar 31, 2016, at 7:12 PM, Tom McCormick <tommccormick@mac.com> wrote:

Jack and Bill,

The draft minutes to the March 17 meeting (attached) say that you might like to meet with me again re the five outstanding Comp Plan docket items. If so, when would you like to meet? Also, at what meeting will the docket items be on the agenda again? I see that they are not included on the agenda for next week's meeting (April 7).

Thank you.

Tom McCormick

<http://www.shorelinewa.gov/Home/ShowDocument?id=25581>

<WebPage.pdf>