From: <u>Tom McCormick</u>

To: Chris Roberts; Shari Winstead; Keith Scully; Doris McConnell; Will Hall; Jesse Salomon; Keith McGlashan

Cc: Debbie Tarry; Bill Willard; John John; Tom Mailhot; Jerry Patterson; Tom McCormick

Subject: Docketing amendments to the Point Wells Subarea Plan

Date: Friday, June 10, 2016 10:57:10 AM

Council Members:

At Monday's meeting, you will be asked to approve the 2016 Comprehensive Plan docket. I submitted two of the proposals, Amendment #7 (Staff Report pages 8c-9 to 8c-11) and Amendment #8 (Staff Report pages 8c-11 to 8c-12). The Planning Commission voted unanimously to recommend that my Amendment #8 be approved for the docket, and it voted 3-3 for my Amendment #7.

I.

Amendment #7. My proposed Amendment #7 reads as follows (the Staff Report misquotes my proposal; I have asked Staff to correct the Staff Report so that it reads as below):

"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 restriped 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 objects to Amendment #7, mainly because they see it as raising a hypothetical scenario.

They object to including any hard number, like 5,000 ADTs, even though there is precedent for including a hard number limit (see, for example, the 4,000 ADT limit currently in the Point Wells Subarea Plan). 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. 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 2015 study shows that when Richmond Beach Road is re-striped to become three lanes west of 8th Ave NW, the excess capacity of that road will be only about 5,000 ADTs under the City's 0.90 V/C standard. And there will be virtually no excess capacity if Richmond Beach Road is re-striped further east, to 3rd Ave NW or Dayton Ave N, as the CIP currently contemplates.

I respectfully request that my Amendment #7 be docketed. You are not being asked to approve my proposal now, but to docket it for later consideration. In light of the proposed Point Wells development, we as a City need to make clear to Snohomish County and others that we have studied our road capacity and have determined that Richmond Beach Road only has a spare capacity of 5,000 ADTs or whatever other number such study reveals. This "study" is neither complicated nor expensive. The City simply needs to produce accurate Peak PM and ADT traffic counts for Richmond Beach Road, then compare those counts to the already-known road capacity (per the City, the one-directional Peak PM capacity is 960 vehicles/hour for a 3-lane road). Especially in light of the proposed Point Wells development, it's time that the City articulate clearly to Snohomish County and others exactly what the current spare capacity is for Richmond Beach Road. That's the baseline. [Note that the spare capacity will likely decrease over the years due to normal traffic growth which the City projects to be 0.25% per year.]

II.

Amendment #8. My proposed Amendment #8 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)."

In contrast to my proposed Amendment #7, which merely revises the introductory text to

Policy PW-11, my proposed Amendment #8 revises the actual text of a Policy, namely, Policy PW-12 of the Point Wells Subarea Plan.

I respectfully request that my Amendment #8 be docketed. Here are five reasons why Council is being asked to follow the Planning Commission's unanimous recommendation, and approve Amendment # 8 for the docket:

- 1. As noted above, Amendment # 8 amends a Policy in the Point Wells Subarea Plan, not merely introductory text. Text contained in a Policy is far more significant and carries far more weight than any introductory text does.
- 2. It costs the City nothing to docket Amendment # 8 and later approve it. No study needs to be commissioned.
- 3. It articulates clearly that the 0.90 V/C standard applies to Richmond Beach Road (implicitly saying that a higher V/C ratio isn't going to happen).
- 4. It makes clear that the 0.90 V/C standard applies to any location along Richmond Beach Road; for example, at the location between NW 190th St and 12th Ave NW. It doesn't apply just to the four legs of arterial intersections. [While Staff has stated that this is how they interpret the 0.90 V/C standard, we need more than verbal assurances that Staff interprets the V/C rule a certain way.] It is critically important that this interpretation is set forth is writing in the Comprehensive Plan, starting with the Point Wells Subarea plan, and eventually in the City's Development Code as well.
- 5. It memorializes that Richmond Beach Road will be a 3-lane road. Though the CIP allocates funding for making it a 3-lane road next year, nowhere in the Comprehensive Plan does it state that Richmond Beach Road will be a 3-lane road.

Regarding the third point above, we are aware that Council has twice approved a 1.10 V/C standard — for 15th Ave NE, and for Dayton Ave N. In the case of 15th Ave NE, for safety reasons, the City converted the street from four lanes to three lanes. But the traffic volume with three lanes produced a V/C ratio greater than 0.90. So in this unique safety-driven case, the Council approved a 1.10 V/C standard for the street. Residents on the east side now suffer long waits on 15th Ave NE which is very congested. Richmond Beach Road presents an entirely different situation. When it gets converted from four lanes to three lanes, the existing traffic volumes will produce a V/C ratio well below the 0.90 V/C standard, particularly west of 8th Ave. NW. Richmond Beach Road will not be congested. So the only reason that Council would approve a higher standard, a 1.10 V/C ratio, would be to facilitate the proposed Point Wells development — to accommodate future increased traffic volume from a proposed development outside the City's borders. Staff and Council Members have said there is little they can do to limit traffic from the proposed development, but here's something concrete that can be done: Approve my Amendment #8 for the Comprehensive Plan Docket, then later this year adopt my Amendment, which makes clear that the 0.90 V/C standard applies to Richmond Beach Road (and that a higher V/C standard is inappropriate).

III.

Please feel free to contact me if you have any questions.

Thank you.

Tom McCormick 206-915-7755