From: Tom McCormick

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

Debbie Tarry; Margaret King; Kendra Dedinsky; Tom Mailhot; Tom McCormick; Bill Willard; Jerry Patterson; John

Deleting Amendment #8 and the 0.65 V/C ratio Subject: Date: Wednesday, December 07, 2016 9:57:22 AM

Dear Councilmembers:

At Monday night's meeting, City staff asked you to support its Amendment #8 to the Comprehensive Plan, which would add to the Point Wells Subarea Plan, "a volume to capacity ratio (V/C) ratio of 0.65 or lower for Richmond Beach Drive north of NW 196th Street."

At the meeting, Councilmember Scully suggested that Amendment #8 be deleted. Presumably, Councilmember Scully's suggestion will be presented as a formal amendment to delete Amendment #8. Please join Councilmember Scully, and vote to delete Amendment #8.

I. The proposed 0.65 V/C ratio is inconsistent with the current 4,000 ADT limit for Richmond **Beach Drive**

In the Point Wells Subarea Plan, there is currently a 4,000 average daily trip (ADT) limit for Richmond Beach Drive.

The Staff Report discussing the City's proposed 0.65 V/C ratio (page 9b-13) has misled you into believing that, "this [0.65 V/C] supplemental LOS standard is generally consistent with the previously established 4,000 ADT cap." This is simply not true. A 0.65 V/C ratio for Richmond Beach Drive would allow nearly 10,000 ADTs — a staggering 2-1/2 times the current limit of 4,000 ADTs. Contrary to what staff has told you, the proposed 0.65 V/C standard in Amendment #8 is totally inconsistent with the current 4,000 ADT limit, and thus, Amendment #8 should be deleted.

In addition to the above, please note that Amendment #8 would violate Resolution 377, which Council adopted on September 21, 2015: "Until such time as policy PW-12 of the Point Wells Subarea Plan is repealed or amended by the City Council, the City shall not take any action or enter into any agreement, arrangement, or understanding that is inconsistent with the 4,000 vehicle trips per day limit set out in PW-12"

Current City staff has stated that a V/C ratio is generally more defensible than the 4,000 ADT hard cap, but has not offered any proof in that regard. It hasn't offered a single example where a hard cap ADT limit has been found to be unenforceable by either the Growth Management Hearing Board (GMHB) or by a Washington court. Keep in mind that prior staff recommended the 4,000 ADT limit (not to mention an 8,250 ADT cap before that), and that the City Council adopted the 4,000 ADT limit (in 2011), and the 8,250 ADT limit before that (in 2010).

Amendment #8 could be salvaged: We would not object to employing a V/C standard on Richmond Beach Drive as a supplemental LOS, if it results in limiting traffic on Richmond Beach Drive to 4,000 ADTs. The way the math works, my guess is that the V/C ratio would need to be around 0.27-0.30; staff could calculate the exact ratio.

II. Inconsistency with Town of Woodway's Comprehensive Plan

The Town of Woodway's Comprehensive Plan, updated June 2015, includes a policy TP-11, "To maintain the Town's adopted Level of Service standard A, as described in the Highway Capacity Manual. This applies to all movements at all intersections and driveways onto Town streets." The Town's Comprehensive Plan states that the Town has "determined that one vehicle turning onto a street from a side street or driveway would experience a LOS less than A if the two-way major street volume exceeds 273 vehicles per hour. Thus, an equivalent corridor LOS can be maintained as long as volumes do not exceed 273 vehicles per hour."

The Town's 273 vehicles-per-hour limit applies to all of the Town's streets, including the portion of Richmond Beach Drive that is within the Town's jurisdiction.

A 273 vehicles-per-hour limit is roughly equivalent to 4,000 ADTs, the City's limit for Richmond Beach Drive. If the City were to adopt a V/C ratio or other standard that would allow more than 4,000 ADTs on Richmond Beach Drive, that would violate the consistency requirement of RCW 36.70A.100, and be subject to challenge. RCW 36.70A.100 reads as follows:

"Comprehensive plans—Must be coordinated.

The comprehensive plan of each county or city that is adopted pursuant to RCW 36.70A.040 shall be coordinated with, and consistent with, the comprehensive plans adopted pursuant to RCW 36.70A.040 of other counties or cities with which the county or city has, in part, common borders or related regional issues."

Summary

For all of the above reasons, please delete Amendment #8 and refuse to adopt the City's proposed 0.65 V/C ratio for Richmond Beach Drive.

As Amendment #8 concerns Point Wells and would amend the Point Wells Subarea Plan, I trust that Deputy Mayor Winstead will be recusing herself from the vote on Amendment #8.

Thank you.

Tom McCormick