

To: Planning Commission  
City of Shoreline

October 2, 2018

Re: Comprehensive Plan Docket amendment #6 (Update to Point Wells Subarea Plan)

My name is Tom Mailhot. I submitted proposed amendment #6. I am glad to see that City staff has agreed to most of my suggested changes to the Point Wells Subarea Plan. I have just a few comments I'd like to make about the staff recommendations.

#### 1. Geographical and Historical Context

The original document said the unincorporated area was 100 acres. The 100 acres included the area now called the Upper Bluff which has recently been annexed by Woodway. My submitted correction was to delete the "100 acres" and replace it with "61 acres". City staff recommends using "50 acres" instead.

I don't understand staff's reasoning on this issue. They state they want to use 50 acres because that's what their Figure 2 map indicates is the area. The 50 acres shown on Figure 2 is close to correct if you ignore the tidelands included in the parcel. The short plat application submitted by BSRE clearly indicates the full parcel is 2,653,620 sq. ft. (60.92 acres) while the tidelands area is 555,161 sq. ft. (12.74 acres).

The full parcel (including the tidelands) is 61 acres. That's what we ought to state in our Comp Plan.

#### 2. Snohomish County's designation of Point Wells as an "Urban Center"

This section talks about the "pending Snohomish County designation of Point Wells as an Urban Center". I suggested adding a sentence at the end of this section confirming that SnoCo did in fact designate Point Wells as an Urban Center. City staff recommends no changes to this section, stating that with the recent denial of BSRE's application, the parcel is now zoned as Planned Community Business with a future land use designation of Urban Village.

I think both my suggestion and staff's recommendation are wrong. If the future land use is now Urban Village, why should our Comp Plan include a section saying it's designated as an Urban Center? That makes no sense. I suggest replacing this section with something like the following:

##### **Snohomish County's designation of Point Wells as an Urban Village**

Despite opposition from the City, in 2010 Snohomish County passed an ordinance designating Point Wells as an Urban Center, allowing up to 3,500 housing units in a mixed use development. The City, the Town of Woodway and others joined in an appeal to the Growth Management Hearings Board, claiming that the Urban Center designation was not consistent with sections of the County's Comprehensive Plan, that the County's FEIS was not complete, and asking the Board to invalidate the County's action. The Board ruled in the City's favor. In response the County passed a new ordinance designating Point Wells as an Urban Village, allowing up to 2,700 housing units in a mixed use development. The new ordinance required any Urban Village application for

Point Wells to include a development agreement signed by the developer and the City for any public services, utilities, or infrastructure provided by the City to support the development, and required the intensity of development be consistent with the level of service standards adopted by the City.

### 3. A Future Vision for Point Wells

Paragraph four starts with “The City’s vision for Point Wells includes a mix of land uses...”. At the end of this paragraph I proposed adding the underlined ending to the last sentence:

However, whatever use mix is proposed must demonstrate that it conforms to adopted parking requirements, site design and building form policies cited below, and that generated traffic after mitigation does not exceed adopted citywide Level of Service standards, and does not exceed the traffic limit for Richmond Beach Drive that is specified in this Subarea Plan.

The staff says the last part of the added wording (double underlined) is an overreach because the 4000 ADT limit the Subarea Plan places on RB Drive was not intended to be permanent.

That may be so, but the amended Subarea Plan (including only staff recommendations) does still include policy PW-12 which clearly puts a 4000 ADT limit on RB Drive. All my suggested amendment does is say that any development must not generate traffic beyond this specified limit. If the limit exists in the Subarea Plan I see no reason not to refer to it here.

### 4. Transportation Corridor Study and Mitigation

The fourth paragraph following Policy PW-10 starts with “Historically, mobility and accessibility in Richmond Beach...”. I proposed an amendment to the end of this paragraph that recognized the City’s plans to rechannel RB Road from 4 lanes to 3 lanes. Staff recommended alternate wording since the planned rechannelization has already been completed. I accept the staff’s alternate amendment.

### 5. New Policy PW-13

I proposed a new policy PW-13:

Policy PW-13 – With a 3-lane Richmond Beach Road, there is little excess traffic capacity under the City’s 0.90 V/C standard for arterials. While the City generally supports a mixed-use development at Point Wells, the City does not support a development at Point Wells that would result in traffic measured at any point along Richmond Beach Road exceeding the City’s 0.90 V/C standard. While certain mitigations may lessen the likelihood of the City’s 0.90 V/C standard being exceeded, the City rejects increasing the City’s 0.90 V/C standard for Richmond Beach Road (e.g., increasing it to 0.95 or higher) as a possible mitigation measure, and the City rejects acquiring private property in order to widen Richmond Beach Road to five lanes as a mitigation measure, and the City rejects as a mitigation measure reverting Richmond Beach Road to four (4) lanes, which would jeopardize the public’s health and safety, especially with increased traffic from Point Wells.

This amendment codifies what the City has consistently said – traffic from the development must not cause a failure of our level of service standards, and while the City welcomes

mitigation of any increased traffic from a development, the City will not acquire property to widen RB Road, and the City will not revert RB Road to 4 lanes.

Staff has several objections.

- Staff says this statement: “the City does not support a development at Point Wells that would result in traffic measured at any point along Richmond Beach Road exceeding the City’s 0.90 V/C standard” exceeds the City’s current LOS standards which allow one road segment to exceed a 0.90 V/C ratio as long as the intersections at the end of that segment still meet LOS standards.

I accept the staff’s objection and suggest the phrase be amended to the following:

“the City does not support a development at Point Wells that would result in traffic exceeding the City’s 0.90 V/C standards.

- Staff also believes the new Policy PW-13 will limit Council when they consider future development proposals for Point Wells, including mitigation that might warrant exceeding the 0.90 V/C (for example, 15th Avenue NE).

My answer is that this is exactly the point. My proposal does not allow the City to ignore the City’s 0.90 V/C standard when considering traffic from some future development at Point Wells. If that’s our standard, we should enforce it. It does not limit the Council because the Council can always change the standard and this Subarea Plan to whatever level they desire, but only after a public process that allows feedback from the community prior to the change.

I believe it is important for this Subarea Plan to clearly state the City’s current policies toward mitigating additional traffic on RB Road. I believe the suggested Policy PW-13 does exactly that and no more. I request the Planning Commission recommend the adoption of new Policy PW-13 with the one change I agreed to above.

#### 6. Old Policy PW-13 (amended as Policy PW-14)

This policy states the City should work with the Town of Woodway, the City of Edmonds, and Snohomish County to adopt interlocal agreements. I suggested deleting the last portion of the policy which calls for the City to be the SEPA lead agency for the transportation element of any future EIS for Point Wells. That made sense when I wrote it since the County was writing the transportation element for BSRE’s application. With BSRE’s application denied, I agree with staff that this provision should remain part of the policy and withdraw my request to delete it.

Thank you,  
Tom Mailhot