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Submitted by Pat Anunsen, Richmond Beach, Shoreline

October 15, 2020 Shoreline Planning Commission Meeting

These comments are related to the 2020 Comprehensive Plan Amendments and the Point Wells Planned Area 4/Subarea Plan. Both of these documents include sections that pertain to transportation issues generated by development of Point Wells.

Thank you for the opportunity to submit comments on this issue. Please remember at least these messages, supported by the comments below:

Although a proposed Comp Plan policy indicates that “A transportation corridor study and mitigation plan shall be prepared and funded by development applicants under the direction of the City” the policy does not make it clear that the City has final authority over the scope of the study and mitigation plans. A small revision can, and should accomplish this.

In Comp Plan and Subarea Plan documents (and other documents prepared by the City of Shoreline related to Point Wells traffic), the main path of traffic from or to Point Wells is repeatedly referred to as a “corridor” as if this is the only possible traffic route, and there will not be streets on alternate routes adversely impacted by Point Wells traffic. Revisions to these documents are essential to ensure that the scope of transportation studies and remediation plans explicitly include “cut-through” streets that vehicles may take. Without this clarification, a developer will likely assert that Richmond Beach Drive and the Richmond Beach Road Corridor is the only path to be considered for study and remediation.

If revisions are not made to these documents (and other documents related to Point Wells vehicular traffic) clarifying that cut-through streets are within the scope of studies and remediation plans, the only winner will be the developer who will not be held accountable for the traffic study and/or mitigation expenses – or for increased risks related to dangerous traffic.

Many of the comments presented here were submitted to the Shoreline Planning Commission for consideration at the September 17, 2020 meeting while reviewing an earlier version of Development Amendments for Point Wells Planned Area 4, especially pertaining to the scope of a transportation study as outlined in 20.94.045 Transportation sections A, B and C.

What streets are considered part of the Point Wells Transportation Corridor?

Transportation routes to and from Point Wells include streets not immediately adjacent to what has been referred the Richmond Beach Road Corridor. In many documents and at many meetings over the last 10 years,

most of the emphasis of the impact of Point Wells traffic focused on Richmond Beach Drive, then Richmond Beach Road, North 185th and other arterials. Certainly, a transportation analysis deserves to begin with these arterial streets since the incremental impact of extra vehicle trips would start there, but as vehicle volumes increase, other streets would become stressed – especially when Richmond Beach Drive and Richmond Beach Road begin to experience slowdowns. Building a second access road from Point Wells through Woodway would only add to the number of streets in both Woodway and Shoreline that drivers would be tempted to use as a short cut to save time and frustration.

As development of Point Wells is considered, analysis of one route as the corridor is simplistic and inadequate. The impact on additional, nearby residential areas and streets and alternate routes must be evaluated. For example, if increased traffic volumes on Richmond Beach Drive and Richmond Beach Road begin to cause slowdowns, residential streets will begin to be used as cut-through paths for drivers heading to Edmonds, Lynnwood, Shoreline, various Light Rail stations, I-5 and into Seattle via Meridian, Aurora and Greenwood. Examples of cut-through streets include 116th Ave W/240th St SW, 114th Ave W/Woodway Park Rd and Timber Lane; 23rd Pl NW/21st Pl NW, NW 204th St, NW 199th St, NW 198th St/NW 197th St, 20th Ave NW (and various streets in the Westgate, Firdale, Hillwood and Richmond Highlands areas).

The opportunity is present now to ensure that cut-through streets are considered within the scope of any Point Wells transportation studies and mitigation actions. If these policies and other guidelines are approved without this as an explicit requirement, when proposals to develop Point Wells begin to be created it is unlikely that developers will volunteer to consider themselves responsible for these “extra” study and mitigation requirements – and costs. As currently worded, the language in these documents will support a developer’s position.

While it may be difficult to predict with precision specific streets that will be most adversely impacted by cut-through traffic, residential and commercial development of Point Wells will most certainly cause this behavior, resulting in the need for traffic analysis and mitigation analysis and actions. If the City of Shoreline decides to leave out this clarifying language, this mistake will be difficult to justify to taxpayers when the City (not the developer) needs to fund traffic analysis/mitigation actions – or even worse, when the City needs to explain why danger/harm caused by cut-through traffic was not addressed.

Item 6a. Staff Report - Draft 2020 Comprehensive Plan Amendments

Point Wells traffic on Richmond Beach Road or the Richmond Beach Road Corridor are discussed a number of times in this 41-page document. There is no mention of traffic seeking alternate routes. Unfortunately, the use of the word corridor implies a single path. Labeling one commonly used route as the Richmond Beach Road Corridor reinforces this idea that only one route deserves analysis and possible mitigation. Alternate routes, not involving Richmond Beach Road, are in use now. The draft Comprehensive Plan Amendments do not consider this, perhaps unintentionally reducing the scope of future transportation studies and mitigation plans.

For example, in the third paragraph of page 19 the document states that “. . . presently Point Wells is connected to the regional road network only via Richmond Beach Drive and Richmond Beach Road in the City of Shoreline.” Even now, a driver regularly traveling from Point Wells to Edmonds is likely well aware of NW 199th or 197th Streets to use as cut-through streets to travel to Edmonds, Woodway or other destinations. Richmond Beach Road may currently be a commonly used path of travel, but cut-through alternatives are already available and in use and will become more commonly used as activity at Point Wells increases. When the second access road through Woodway is added, numerous additional, usually narrow, streets come into play as short-cuts impacting both Woodway and Shoreline areas. Perhaps only arterials were being considered as this Comp Plan section was being drafted addressing police, fire and medical services (and vehicles), but the idea of there being only one route available was certainly being reinforced.

If the City of Shoreline feels it necessary to continue to use the word corridor, it would be more than prudent to add appropriate text to at least one of these sections to clarify that areas impacted by Point Wells traffic will not be confined to a single route or street, and that traffic studies and mitigation plans will include streets that can be expected to be used as cut-through streets for Point Wells traffic.

Please review the paragraph on T/C Policy 1 (pdf page 23), and the suggested revisions:

A transportation corridor study and mitigation plan shall be prepared and funded by development applicants under the direction of the City, with input, participation, and leadership, as appropriate, from Woodway, Snohomish County, WSDOT, and other stakeholders. *[See suggestion below.]* ~~The scope of the study and mitigation plan should be prepared with input from~~ each jurisdiction with an emphasis on identification of impacts and mitigating measures, design improvements and associated costs, needed services, including design and financing for multimodal solutions to improve mobility within the surrounding neighborhoods and communities.

The draft language of this policy has much merit, but does not clearly state who is the final authority for determining what is included within the scope of traffic studies and mitigation plans. This text can easily provide clarification by adding, “ While the City shall retain final authority over the scope of the studies and mitigation plans, these should be prepared with input from . . .”

Item 6b. Dev. Code Amends. Point Wells Planned Area 4 Zone/Subarea Plan

This document should receive clarifying language similar or identical to that used in the 2020 Comprehensive Plan Amendments noted above. “Richmond Beach Road Corridor” is referred to three times in this 17-page documents (pdf pages 3, 5 and 13). Several opportunities are available to add clarifying text – the first bullet point on page 5 under Transportation and in Section A on page 13 under 20.94.045 Transportation. (The general concepts described in Section “C Connectivity” are not substitutes for making it clear to developers that they will need to pay for studies and mitigation actions to address cut-through traffic issues.)

It is desirable that there be consistency between the Comp Plan and the Planned Area 4/Subarea Plan documents in sections dealing with Point Wells transportation issues. Where possible, it would be best to use the same wording in both of these documents to make it clear that consideration of cut-through traffic is within the minimum scope of transportation studies and mitigation actions related to residential and commercial development at Point Wells.

Other Documents related to Point Wells Transportation Corridors

Additional documents not on the October 15, 2020 Planning Commission agenda should also be aligned with the Comp Plan and the Planned Area 4/Subarea Plan.

The draft SEPA ENVIRONMENTAL CHECKLIST document distributed by the City of Shoreline on September 30, 2020 refers only to Richmond Beach Drive and Richmond Beach Road when describing the Point Wells traffic corridor. Since this checklist is used in the development process, adding text in several places can make sure developers know addressing impacts on cut-through streets is in the scope of their project.

For example, the draft SEPA ENVIRONMENTAL CHECKLIST includes a number of transportation issues on Pages 18 through 24 of the document. Transportation goals and policies are described on Page 23, which

include T/C Policies 1 through 5. The language used for T/C Policies appears to be drawn from the content of Point Wells Planned Area 4, 20.94.045 Transportation sections A, B and C. Adding the clarifying text consistent with Comp Plan and Planned Area 4/Subarea Plan wording is suggested - possibly using the same verbiage used in the 2020 Comprehensive Plan and the Development Amendments for Point Wells Planned Area 4. (This approach, using consistent wording, is a good practice when analysis and mitigation of Point Wells traffic issues is addressed in other documents prepared by Shoreline, and/or by Woodway.)

These suggestions will be submitted as comments as City of Shoreline staff gathers input later this year for the SEPA ENVIRONMENTAL CHECKLIST.

Thank you for considering these comments.