

From: Tom McCormick <tomccormick@mac.com>
Sent: Sunday, January 08, 2017 5:33 PM
To: Countryman, Ryan; MacCready, Paul
Subject: City of Shoreline's comment letter re MDNS
Attachments: Town of Woodway Comprehensive Plan Amendment Response Letter 1-3-17.pdf

Attached.



**SHORELINE
CITY COUNCIL**

Chris Roberts
Mayor

Shari Winstead
Deputy Mayor

Will Hall

Doris McConnell

Keith A. McGlashan

Jesse Salomon

Keith Scully

January 3, 2017

Mr. Bill Trimm, Town Planner
Town of Woodway
23920 113th Place W.
Woodway, WA 98020

RE: Mitigated Determination of Non-Significance Proposed Comprehensive
Plan Amendment - Transportation Policy TP-11

Dear Mr. Trimm:

The City of Shoreline submits the following comments in regards to the comprehensive plan amendment proposed by BSRE Point Wells LP for which you issued a Mitigated Determination of Non-Significance (MDNS) on December 21, 2016. Despite the City's concern in regard to this proposed amendment - which will modify the Town of Woodway's level of service (LOS) standard on approximately 250 feet of a single roadway that will distribute traffic solely into the City of Shoreline's transportation network - the MDNS was the first notice received by the City in regards to this proposed amendment. Notice which clearly does not support the relationship neighboring jurisdictions should maintain when planning.

The City would like to first note a transportation corridor study in regards to Richmond Beach Drive and Richmond Beach Road as provided for in its Point Wells Subarea Plan has been underway for some time. The purpose of this study is to evaluate projected impacts on vehicular flow and levels of service at every intersection and road segment in the Richmond Beach corridor along with bicycle and pedestrian impacts. The end result of the study, in addition to providing necessary information for the environmental impact statement being prepared for the Point Wells development, is the development of a multi-modal plan for mobility and accessibility to and from Point Wells; a plan which most likely will involve a secondary access road through the Town of Woodway. In sum, the completion of this study will serve to provide an essential understanding of traffic impacts on the corridor, of which that portion within the Town of Woodway is only but a small component of, and how to appropriately mitigate the impacts that will almost exclusively be felt in the City of Shoreline. The Environmental Checklist submitted by the proponent failed to even mention this corridor study or the environmental review being prepared for the project by Snohomish County.

Moreover, the Environmental Checklist distorted the anticipated traffic volumes that would arise from a completed Point Wells development, a vested project that is anticipated to have more than 3,000 residential units in addition to commercial and retail complexes. To contend that this single roadway, with its one access point into the City of Shoreline's transportation network, would not result in vehicle trips greater than denoted in the Environmental Checklist, is unbelievable. In addition, the "mitigation" set forth in the MDNS is nominal at best or not capable of being implemented. While development of roadway improvements to address surface water runoff would assist in that regard, given the short distance of this roadway within the Town of Woodway, traffic calming devices and delay mitigation techniques would essentially have no impact or, for a technique such as a "Michigan Left turn," the City of Shoreline does not believe there to be adequate Right of Way to accommodate this technique.

In addition, this proposed amendment is contrary to the Growth Management Act, 36.70A RCW. Chief among the many tenets of the GMA is to encourage neighboring cities to externally plan so as to coordinate comprehensive plans. RCW 36.70A.100, .020(3), and .020(11) all require consistency and coordination between a jurisdiction's comprehensive plan and the comprehensive plans of adjacent jurisdictions. RCW 36.70A.100 states that the comprehensive plan of each city shall be *coordinated with, and consistent with*, the comprehensive plans adopted by other cities with which the city has, in part, common borders or related regional issues. RCW 36.70A.020(3) and .020(11), two of the GMA's planning goals that are to guide development, similarly speak to coordination. Goal 3 Transportation seeks transportation systems that are *coordinated* with city comprehensive plans. Goal 11 Public Participation seeks to ensure *coordination* between jurisdictions to reconcile conflicts.

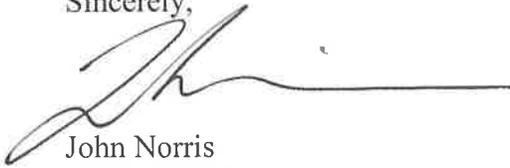
The City's Point Wells Comprehensive Subarea Plan is replete with policies to address the unique transportation challenges of Point Wells. Policies PW-9, PW-10, and PW-11 all speak to the transportation needs for Point Wells and the desire of the City of Shoreline to work with neighboring jurisdictions, like the Town of Woodway, to address these needs. The Town of Woodway's Transportation Element similarly recognizes the need to coordinate planning efforts with neighboring jurisdictions. Specifically, Policy TP-4 seeks to coordinate planning with surrounding jurisdictions. To unilaterally modify the LOS on Richmond Beach Drive would result in uncoordinated planning contrary to the policies of both the City of Shoreline's and the Town of Woodway's comprehensive plans.

The basis for uncoordinated planning is the fact that many years ago, Shoreline adopted Policy PW-12 in the City's Comprehensive Plan which established a maximum capacity of 4,000 vehicle trips per day on Richmond Beach Drive, a designated local street. The establishment of a LOS C on that portion of Richmond Beach Drive within the Town of Woodway would be in direct conflict with Shoreline's Policy PW-12. The Environmental Checklist, at Paragraph 11, states that 912 PM peak trips will be added to the Richmond Beach Drive corridor. This extrapolates to an Average Daily Traffic range of between 7,600-11,400 vehicles per day on the corridor, which is clearly inconsistent with the City of Shoreline's 4,000 vehicle trips per day limitation.

Lastly, Policy PW-13 speaks to the development of interlocal agreements to address issues related to Point Wells. RCW 36.70A.070(6) and .020(12) require cities to adopt LOS standards and to regionally coordinate transportation plans. While the City of Shoreline acknowledges that the Town of Woodway may adopt whatever LOS standard it believes best serves the interests of the Town, the proposed comprehensive plan amendment would create, not resolve, Point Wells issues and conflicts with PW-13 and the GMA as noted above. The only impact in modifying the LOS for Richmond Beach Drive would be on the City of Shoreline's transportation system, a system that has regional implication as it serves the broader King/Snohomish counties networks.

Thank you for giving full consideration to the City of Shoreline's comments in regards to the December 21, 2016 MDNS and to the proposed comprehensive plan amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Norris', with a long horizontal flourish extending to the right.

John Norris
Acting City Manager

cc: Shoreline City Council
Debbie Tarry, City Manager
Margaret King, City Attorney
Julie Ainsworth-Taylor, Assistant City Attorney
Rachael Markle, Planning and Community Development Director
Scott MacColl, Intergovernmental Relation Manager
Kendra Dedinsky, Traffic Engineer