**Planning Commission Meeting Date: December 3, 2009**

**PLANNING COMMISSION AGENDA ITEM**
CITY OF SHORELINE, WASHINGTON

| | |
|---|---|
| **APPLICATION NUMBER:** | 301618 |
| **AGENDA TITLE:** | Public Hearing on Point Wells Subarea Plan and Pre-Annexation Zoning Regulations |
| **PRESENTED BY:** | Joseph W. Tovar, FAICP, Director PDS<br>Steven M. Cohn, Senior Planner |

## I. INTRODUCTION

Your next meeting will provide the public with an opportunity to offer testimony on the proposed Point Wells Subarea Plan and Pre-Annexation Zoning Regulations. The Plan and Regulations were the subject of Planning Commission discussion at November 5 and 19 meetings.

### Proposal

Even though the Point Wells area is currently an unincorporated island in Snohomish County, Shoreline's Comprehensive Plan addresses the area's potential redevelopment because when it redevelops, Shoreline's neighborhoods will bear the impact of increased traffic.

The existing Shoreline Comprehensive Plan designation is Mixed Use, which is a general land use category that would permit a wide variety of development including residential and commercial uses at varying intensities. The proposed Subarea Plan is intended to define the vision for development of the site (Attachment 1).

If the owner of the property chooses to annex to Shoreline, the City's Subarea Plan and development regulations would guide the area's redevelopment. Therefore staff has developed a set of regulations ("pre-annexation zoning") that would be effective after annexation. The proposed regulations would be the rules that would guide the site's redevelopment. In the event that development occurs prior to annexation, it would be the City's intention to offer the zoning concepts to Snohomish County so the County decision-makers could understand Shoreline resident's concerns and, optimally, address Shoreline's concerns when creating a development code that will impact the residents of both Shoreline and Woodway.

## II. RESPONSES TO COMMISSIONERS' QUESTIONS

Commissioners have asked a number of questions during study sessions. Many questions were addressed by staff at the study sessions. Other questions were more complex and took some time to research. Because of the limited time for research or analysis, the responses below reflect staff work as of this point. Staff expects to gather

additional material next week. If time permits, it will be sent to you early next week so you can review it prior to your meeting.

*Question 1: What is the availability of water and sewer service on the Point Wells site?*

This question was addressed in the Snohomish County SEIS. Staff contacted the providers to update the information. Olympic View Water and Sewer, located in Edmonds, provides water to this area. They have an agreement with Seattle Public Utilities to provide water, and in the past, served the Chevron manufacturing facility with a large quantity of water, so supply is not a problem. Since the facility is only served through one main, reliability could be an issue, so they would probably want to build a loop system that ties into the Seattle system that goes along the County line. The cost of this improvement would be borne by the developer.

Ronald Wastewater provides sewer service to Point Wells. Redevelopment of this area would require improvements to the "lift" system in order to pump water uphill. Funding of the improvements would come from the developer.

*Question 2: Snohomish County has designated Point Wells as an Urban Center. What other areas have received an Urban Center designation?*

Snohomish County has identified 6 areas as Urban Centers. They are noted on the attached map (Attachment 3). Snohomish County's definition of Urban Center is: An area with a mix of high-density residential, office and retail uses with public and community facilities and pedestrian connections located along an existing or planned high capacity or transit route.

Attachment 3 shows that two of the areas are located along SR-99, two are adjacent to I-5, and one is along SR-527. Point Wells is not located near a major arterial that might be likely served by transit. There is a rail line that is adjacent to Point Wells; however, Sound Transit's 20-year plan does not show a station at Point Wells.

As part of Vision 2040, the PSRC has mapped designated Regional Centers (Attachment 4). Regional Growth Centers in North King and South Snohomish Counties include Northgate, Totem Lake, Bothell Canyon Park, Lynnwood and Downtown Everett. These centers are intended to be served by fast and frequent high-capacity transit service and are areas zoned for significant additional growth.

*Question 3: The Commission requested that staff modify the table summarizing the model outputs to show additional columns identifying the difference between the 2025 base output and each of the Point Wells scenarios.*

These changes are shown in Attachment 5. As staff reviewed the table and the computer model, they discovered a couple of intersections in the base model that could be further optimized and re-ran the model. The tables were updated to include the revised results.

The Commission also requested that staff compare the volumes on the corridor in each of the scenarios. Staff chose 4 points along the route and developed another table

showing this data. This table shows the base volumes in 2025 (without Point Wells trips) and the volumes with the added Point Wells trips.

*Staff is reviewing the November 19 minutes to identify other questions asked by the Commission that were not addressed at the study session. Staff will endeavor to provide Commissioners with responses early next week.*

## III. PROCESS

- Study sessions were held with the Planning Commission on November 5 and 19, 2009.
- A Notice of Application and Draft SEIS were issued on October 29, 2009. As of November 25, two comments have been received (Attachment 6)
- Comments are due by November 30, 2009. The City anticipates issuing the Final SEIS early in the week of December 7, 2009.
- A Public Hearing with be held on December 3, 2009. At the hearing, all the SEIS comments will be available for Commission review, together with the staff's draft responses. If the Commission chooses to not make a recommendation that evening, it may choose to continue the hearing to December 10, 2009 for deliberation or, if necessary, additional testimony and deliberation.
- The Commission's recommendation will be forwarded to the City Council for action. The Council is scheduled to discuss the Subarea Plan recommendation on January 25. The adoption date has not been set.
- State law requires two public hearings by Council to adopt pre-annexation zoning. The Hearings on the pre-annexation are scheduled for January 25 and March 1 with action scheduled to occur on March 1.

## V. STAFF RECOMMENDATION

Staff concludes that the proposals merit approval. Since the Plan and Regulations are rather complex, it may not be possible for the Commission to develop a recommendation at the December 3 meeting. In that case, the "deliberations" portion of the Hearing would likely be continued to the following week.

If you have additional questions prior to the meeting, please contact Steve Cohn at 206-801-2511, or email him at scohn@shorelinewa.gov.

## VI. ATTACHMENTS

1. Proposed Subarea Plan
2. Proposed Pre-annexation zoning
3. Snohomish County's Urban Centers Map
4. PSRC's Regional Centers Map
5. Traffic Model results
6. Comment letters on City of Shoreline's Draft SEIS
7. Illustration of 20.92.070 C, Minimum separation of tall building

# Point Wells Subarea Plan

## Geographic and Historical Context

Point Wells is an unincorporated island of approximately 100 acres in the southwesternmost corner of Snohomish County. It is bordered on the west by Puget Sound, on the east by the Town of Woodway, and on the south by the town of Woodway and the City of Shoreline (see Fig. 1). It is an "island" of unincorporated Snohomish County because this land is not contiguous with any other portion of unincorporated Snohomish County. The island is bisected roughly north-south by the Burlington Northern Railroad (B.N.R.R.) right-of-way.


**Figure 1 – Point Wells unincorporated island**

The lowland area of this unincorporated island (see Fig. 2) is approximately 50 acres in size. The only vehicular access to the lowland portion is to Richmond Beach Road and the regional road network via the City of Shoreline.

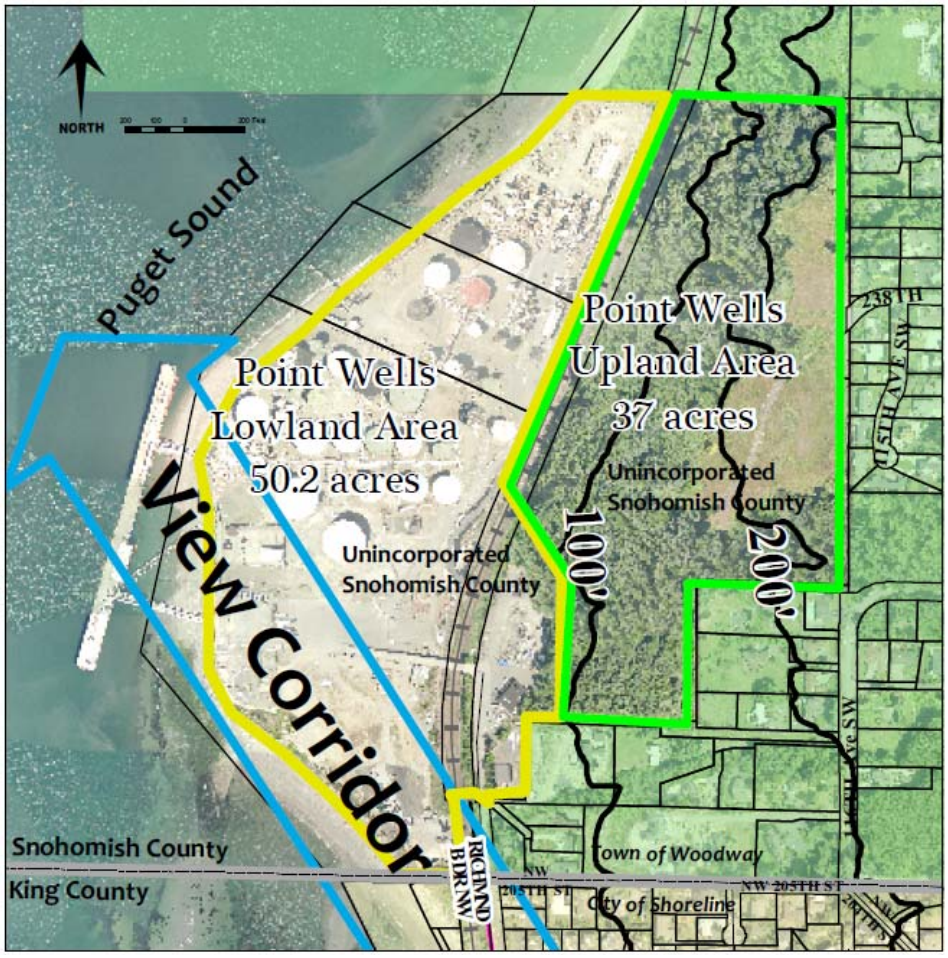



**Figure 2 – Upland and Lowland Areas at Point Wells**

The upland area of the Point Wells Island (see Fig. 2) is approximately 37 acres in size. The upland does not have access to Richmond Beach Drive due to very steep environmentally sensitive slopes that separate the upland portion from the lowland portion. However, the upland portion does have potential easterly access through the Town of Woodway via 238th St. SW.

All of the Point Wells Island was previously designated by the City of Shoreline as a "Potential Annexation Area" (PAA). The Town of Woodway, and Snohomish County, have previously identified all of the Point Wells unincorporated island as within the Woodway "Municipal Urban Growth Area" (MUGA). The Washington State Court of

Appeals, in a 2004 decision, determined that the overlap of Shoreline's PAA and Woodway's MUGA does not violate the provisions of the Growth Management Act.

**Snohomish County's designation of Point Wells as an "Urban Center"**

In April of 2009, the Shoreline City Council adopted Resolution 285 which opposed the pending Snohomish County designation of Point Wells as an "Urban Center." The resolution cited the likely excessive impacts of up to 3,500 dwelling units on Shoreline streets, parks, schools, and libraries. The City submitted several comment letters to the County Council detailing the reasons for the City's opposition, reiterating the City's support for a mixed use development of a more reasonable scale at Point Wells, and pointed out that an "Urban Center" designation would be inconsistent with provisions of the County's plan as well as the Growth Management Act.

**Designation of a Future Service and Annexation Area (FSAA) at Point Wells**

After a review of the topography and access options for Point Wells, the City of Shoreline no longer wishes to include the upland portion of this unincorporated island within its designated urban growth area. Because of the upland portion's geographic proximity and potential for direct vehicular access to the Town of Woodway, the City of Shoreline concludes that the upland portion should be exclusively within the Town of Woodway's future urban growth area. Any people living in future developments in the upland portion of the Point Wells Island would feel a part of the Woodway community because they would share parks, schools, and other associations facilitated by a shared street grid.

Applying the same rationale to the lowland portion of the Point Wells Island, the City of Shoreline wishes to reiterate and clarify its policies. These lands all presently connect to the regional road network only via Richmond Beach Drive and Richmond Beach Road in the City of Shoreline. Therefore future re-development of the lowland area would be most efficiently, effectively, and equitably provided by the City of Shoreline and its public safety partners, the Shoreline Fire Department and Shoreline Police Department.

At such future time that the lowland portion of the Point Wells Island annexes to the City of Shoreline, the urban services and facilities necessary to support mixed use urban development would be provided in an efficient and equitable manner. These would include police from the Shoreline police department and emergency medical services and fire protection from the Shoreline Fire Department. In addition, the City would be responsible for development permit processing, code enforcement, parks, recreation and cultural services, and public works roads maintenance.

Future residents of the lowland portion of Point Wells would become a part of the Richmond Beach community by virtue of the shared parks, schools, libraries, shopping districts and road grid. As citizens of the City of Shoreline, they would be able to participate in the civic life of this "community of shared interests," including the

City's Parks Board, Library Board, Planning Commission, or other advisory committees, and City Council.

*Policy PW-1 The Lowland Portion of the Point Wells Island, as shown on Figure 3, is designated as the City of Shoreline's proposed future service and annexation area (**FSAA**)*

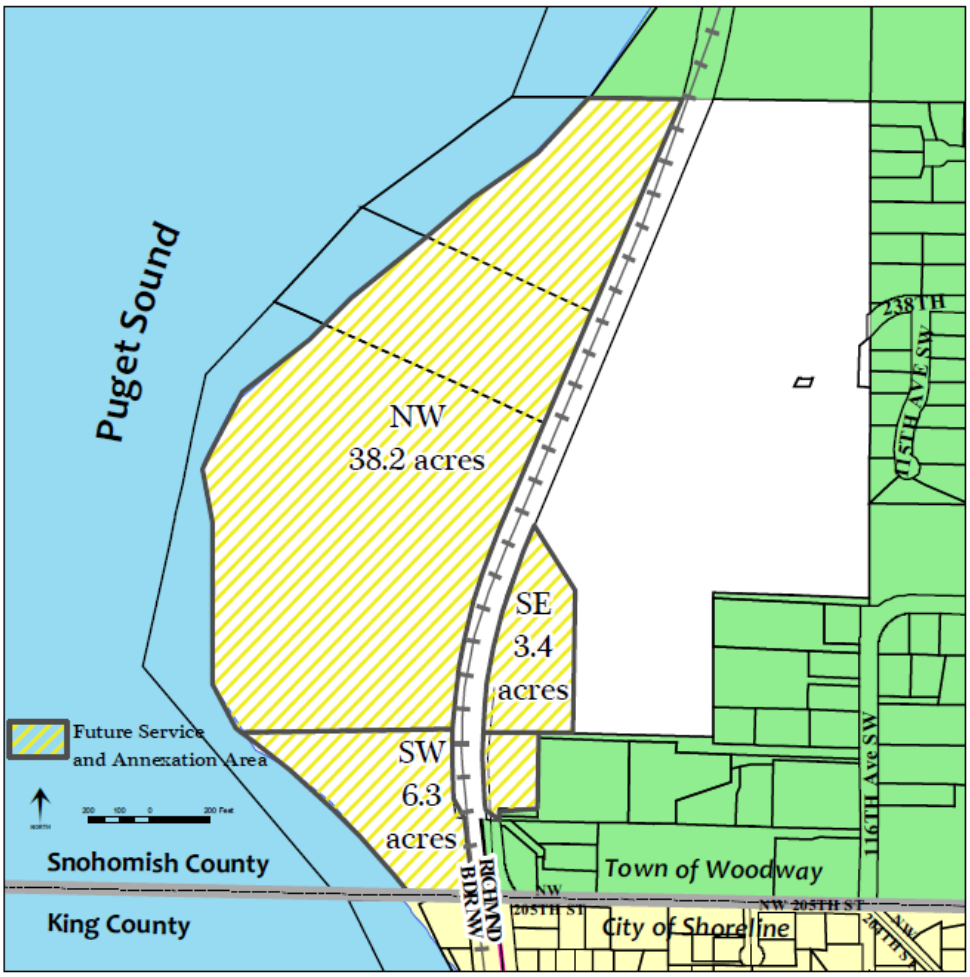



**Fig. 3 – City of Shoreline Future Service and Annexation Area**

## A Future Vision for Point Wells

The City's vision for Point Wells is a world class environmentally sustainable community, both in site development and architecture. The redevelopment of the site should be predicated on remediation of the contaminated soil, and the restoration of streams and native plant regimes appropriate to the shoreline setting. New site design and improvements should incorporate low impact and climate friendly

practices such as alternative energy sources, vegetated roofs, rainwater harvesting, rain gardens, bioswales, solar and wind technologies. Development at Point Wells should exhibit the highest quality of sustainable architecture, striving for gold or platinum LEED (Leadership in Energy and Environmental Design) certification.

Point Wells also represents a major opportunity to create a new subarea consistent with City objectives for economic development, housing choice, and waterfront public access and recreation. With almost 3,000 linear feet of waterfront, and sweeping 180 degree views from Admiralty Inlet off Whidbey Island to Rolling Bay on Bainbridge Island, this site has unparalleled opportunity for public access, environmental restoration, education, and recreation oriented to Puget Sound.

The City's vision for Point wells includes a mix of land uses, including residential, commercial, and recreational. The City recognizes that the site may be suited to a wide range of residential uses (e.g., market rate housing, senior housing, special needs housing, hotels, extended stay, etc.) as well as a range of commercial uses (e.g., office, retail, restaurant). Rather than proscribe the number or type of residential units, or the floor area of various types of commercial uses, the City prefers that flexibility be left to the developer to respond to market realities. However, whatever use mix is proposed must demonstrate that it conforms to adopted parking requirements, site design and building form policies cited below.

There are at least three distinct sub-areas within the FSAA, identified on Fig. 3 with the notations NW, SW, and SE. Because of their proximity to the single family neighborhoods to the east and south, maximum building heights in the SW and SE areas should be lower than in the NW subarea. Because of the large difference in elevation between the NW subarea and lands east of the railroad tracks, much taller buildings could be placed in this area without significantly impairing views. Building placement in this area should avoid obstruction of the view corridor shown on Fig. 2. The appropriate number, placement and size of taller buildings in NW subarea should be determined through the development permit and environmental review process.

The portion of the Puget Sound shoreline in the SW subarea is the most environmentally sensitive area and a candidate for habitat restoration. This area has sandy substrate, supports some beach grass and other herbaceous vegetation, and contains a fair a mount of large, woody debris. This area should be a priority for open space and restoration including elimination of invasive plants, re-establishing native riparian and backshore vegetation.

Any improvements in the westernmost 200 feet (within the jurisdiction of the Shoreline Management Act) of the NW and SW subareas should be limited to walkways and public use or park areas. Outside that shoreline area, buildings should be located and configured to maintain as much openness and views across the site as possible, with taller structures limited to the central and easterly portions.

*Policy PW-2 A public access trail should be provided and appropriate signage installed along the entire Puget Sound shoreline of the NW and SW subareas and secured with an appropriate public access easement document.*

The relatively lowland area west of the tracks (between 10 and 20 feet above sea level) is abutted east of the tracks by a heavily forested slope. See Fig. 1. The slope rises steeply (15% to 25% grades) from the railroad tracks to the top of the slope, which is at approximately elevation 200. See Figure 2. The tree line at the top of the slope consists of mature trees from 50 to 100 feet in height, which further obscure views of Point Wells from the portions of Woodway above elevation 200.

*Policy PW-3 New structures in the NW subarea should rise no higher than elevation 200.*

New buildings east of the railroad tracks would be much closer to existing single family homes in Woodway and Richmond Beach. To reflect this proximity, buildings of a smaller scale are appropriate.

*Policy PW-4 New structures in the SE Subarea should rise no higher than six stories.*

In order to promote maximum openness on the site and prevent bulky buildings, the City should consider innovative regulations such as design standards and guidelines, building floor plate maxima, requiring a minimum separation between taller structures and the protection of public view corridors. Public views from city rights-of-way in the Richmond Beach neighborhood are a major part of the area's character, and provide a sense of place, openness, beauty and orientation. A prominent view corridor across the lowland area, shown in Fig. 2, affords a view from Richmond Beach Drive northwest to Admiralty Inlet and Whidbey Island. Placement and size of structures at Point Wells should be located and configured so as not obstruct this important view corridor.

*Policy PW-5 New structures in the NW subarea should be developed in a series of slender towers separated by view corridors.*

*Policy PW-6 The public view from Richmond Beach Drive in Shoreline to Admiralty Inlet should be protected by a view corridor across the southwest portion of the NW and SW subareas.*

**Transportation Corridor Study and Mitigation**

A traffic and safety analysis performed by the City in the summer of 2009 evaluated the nature and magnitude of impacts likely to accrue from the development of Point Wells as an "Urban Center" under Snohomish County zoning, as well as

development scenarios assuming lesser orders of magnitude. The City concluded that, prior to the approval of any specific development project at Point Wells, the applicant for any development permit at Point Wells should fund, and the City oversee, the preparation of a detailed Transportation Corridor Study.

The Transportation Corridor Study should encompass all of Richmond Beach Drive and Richmond Beach Road, and all their intersections with public roads, from NW 205th Street to State Route 99, and include an evaluation of projected impacts on vehicular flow and levels of service at every intersection and road segment in the corridor. The Study should also evaluate bicycle and pedestrian safety as impacted by the projected annual daily and peak hour traffic, and identify appropriate "context sensitive design" treatments for every intersection, road segment, block face, crosswalk and walkway in the study area. In addition to conventional engineering design, the Study should evaluate the value and feasibility of innovative strategies and improvements such as road diets, complete streets, one way couplets, roundabouts, and traffic calming devices.

.

> *Policy PW-7 To enable appropriate traffic mitigation of future development at Point Wells, the developer should fund the preparation of a Transportation Corridor Study, under the direction of the City. The Study should identify, engineer, and provide costs for intersection, roadway, walkway and other public improvements needed to maintain or improve vehicular, bicycle and pedestrian safety and flow on Richmond Beach Drive and Richmond Beach Road.*
>
> *Policy PW-8 The needed mitigation improvements identified in the Transportation Corridor Study should be built and operational concurrent with the occupancy of the phases of development at Point Wells.*

Richmond Beach Road and Richmond Beach Drive provide the only vehicular access to Point Wells. Therefore, it is critical that identified impacts be effectively mitigated as a condition of development approval. It is also vital that the scale of traffic generated from Point Wells be limited.

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 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. Therefore, the City should establish a maximum daily traffic threshold emanating from Point Wells and require preparation of a Transportation Corridor Study to identify necessary mitigations.

> *Policy PW-9 The maximum daily traffic that the City should permit on Richmond Beach Drive from Point Wells should not exceed 8,250 vehicle trips per day, or a maximum peak hour of 825 trips (trips are counted both entering and leaving).*

**Interjurisdictional Coordination**

The City should work with the Town of Woodway to identify ways in which potential future development in the lowland portion of Point Wells could be configured or mitigated to reduce potential impacts on Woodway. There is no practical primary vehicular access to the lowland part of Point Wells other than via Richmond Beach Road. However, the City should work with property owners and Woodway to provide a bicycle and pedestrian route to connect Woodway to Puget Sound

The Growth Management Act states that cities, rather than county governments, are the preferred providers of urban governmental services. Because urban governmental services and facilities in Shoreline are much closer to Point Wells than are similar services and facilities located in Snohomish County, it is most efficient for the City to provide those services.

Working with its public safety partners, Shoreline Fire Department and Shoreline Police Department, the City should invite Snohomish County to discuss an interlocal agreement to address the timing and methods to transition local governmental responsibilities for Point Wells from the County to the City. Included in these discussions should be responsibilities for permitting and inspection of future development at Point Wells, and possible sharing of permitting or other local government revenues to provide an orderly transition.

> *Policy PW-10 The City should work with both the Town of Woodway and Snohomish County toward adoption of interlocal agreements to address the issues of land use, construction management of, urban service delivery to, and local governance of Point Wells.*

# Chapter 20.92
# Planned Area 1 Zone

**Sections:**



## 20.92.010 Purpose and Scope

A. The purpose of this chapter is to implement the City's vision set forth in the Point Wells Subarea Plan. This vision includes a mix of residential, commercial, and recreational uses, public access to Puget Sound, restoration and protection of nearshore and upland waterfront environments, and a high standard for sustainable building and site design, construction and operations. The scope of this Chapter includes processes and standards regarding the scale, character, configuration and location of development on site as well as provisions to ensure compatability and transition to adjacent single family neighborhoods, and the mitigation of off-site impacts to the City's transportation and parks systems.

B. All development in the Planned Area 1 zone is:

1. Subject to the regulations of:

   a. This chapter;

   b. SMC 20.10 – General Provisions

   c. SMC 20.20 – Definitions

   d. SMC 20.30 – Procedures and Administration as noted below

   e. SMC 20.40 – Zoning and Use Provisions

   f. SMC 20.50 Subchapter 5 - Tree Conservation, Land Clearing and Site Grading Standards

   g. SMC 20.50 Subchapter 6 – Parking, Access and Circulation

   h. SMC 20.50 Subchapter 7 – Landscaping Standards

   i. SMC 20.60 – Adequacy of Public Facilities

   j. SMC 20.70 – Engineering and Utilities Development Standards

   k. SMC 20.80 – Critical Areas regulations

2. Exempt from the development standards of subchapters 2, 3, and 4 of SMC 20.50.
3. If provisions of this chapter conflict with provisions elsewhere in the Shoreline Municipal Code, the provisions of this chapter shall apply. When it is unclear which regulations apply, then the presumption shall be that the regulations of this chapter take precedence with the ultimate determination to be made by the Director.

**20.92.020 Planned Area 1 Official Zoning Map Designation**

In order to implement the vision described in the Point Wells Subarea Plan of the Comprehensive Plan, the Planned Area 1 zone is created and applied as shown on the City's official zoning map with the designation "PLA 1". The map notations "PLA 1A,' "PLA 1B," and "PLA 1C" indicate where different building height, land uses, and development standards apply. Unless otherwise specifically noted, all the requirements of this Chapter apply to all three PLA 1 designations.

**20.92.030 Permitted and Prohibited Uses**

All uses provided for under SMC 20.40.120-.140, including unlisted uses under SMC 20.40.570, are permitted outright in Planned Area 1 except the following, which are prohibited:

A. Adult use facilities;

B. Gambling uses;

C. Vehicle repair, service and/or sales unless entirely within an enclosed building;

D. Outdoor material storage, including vehicles. Material storage shall be allowed only within a fully-enclosed structure;

E. Other uses the Director determines to not comport with the intent of the district as expressed in SMC 20.92.010, Purpose and Scope.

**20.92.040 Required Permit Review Processes**

A. **Applicability** – No building, grading or other development permission shall be given by the City until an application for Administrative Design Review (ADR) permit is first processed and approved by the Director. Any application for permit within the jurisdiction of the Shoreline Management Act shall also make application for a Shoreline Substantial Development Permit (SDP). The ADR permit and the SDP permit are both "Type B" Administrative decisions that may be processed concurrently. Both the ADR permit and the SDP permit are subject to the procedural requirements of SMC 20.30.050 and SMC 20.30.080 through SMC 20.30.290.

B. **Submittal Requirements for ADR permit** – The applicant shall submit the following:

1. A site plan at a scale to be determined by the City, identifying all proposed grading, cuts, and fills, the location and dimension of proposed structures, vehicular surfaces and the network of pedestrian circulation improvements, open spaces and public areas.
2. A landscape and open space plan locating and listing all proposed plant species and other landscape construction features.
3. Building elevations drawn to scale illustrating the materials, colors and textures to be used as well as an indication of where and how building entrances and openings orient to the pedestrian circulation network on site.
4. Details of any exterior architectural lighting scheme and the specific lighting fixtures and performance standards of any exterior lighting of parking areas, driving surfaces, pedestrian pathways and public areas.
5. A digital model of the entire proposed site illustrating the pre-existing and proposed finished contours of the site and the location, dimension, and orientation of every structure on the site with a footprint larger than 1,000 square feet. The submitted file of said digital model shall be in a format acceptable to the City.
6. An environmental checklist.
7. A preliminary LEED checklist or comparable means of demonstrating the proposals compliance with the sustainability standards of this Chapter.
8. A Transportation Demand Management Plan.

C. **Standards for Approval** – The applicant for any design review permit shall demonstrate that the plans satisfy the development standards set forth in 20.92.050 and the design guidelines adopted pursuant to 20.92.060, unless approved as a design departure by the Department Director.

D. **Design Departures** – A permit applicant wishing to modify any of the development standards of section 20.92.050 or the design guidelines of section 20.92.060 may apply for a design departure if the Director concludes that the proposed modification meets or exceeds the design objectives of the stated standard or guideline.

E. **Review and Approval** – The Director may approve, deny, or approve with design departure modifications and/or conditions, an application for Administrative Design Review. A decision of the Director may be appealed to the Hearing Examiner. On review, the Hearing Examiner shall accord substantial weight to the Director's decision.

**20.92.050 Coordination and Compliance with Shoreline Management Act requirements**

A. All lands within 200 feet of the Puget Sound shoreline are subject to the requirements of Chapter 90.58 RCW, the Shoreline Management Act. Consequently, a permit submitted pursuant to SMC 20. 92.040 that lies within the jurisdictional limits of the Shoreline Management Act shall also be required to submit for a Shoreline Substantial Development Permit (SDP).

B. All submittals for ADR and SDP permits shall include a shoreline restoration plan that includes the following features:

1. Removal of bulkheads to reestablish sediment delivery.
2. Replacement of bulkheads with soft shore stabilization.
3. Replanting of nearshore vegetation.
4. Planting of eelgrass, kelp and other aquatic macrophytes.
5. Replacement or enlargement of undersized culverts to be fish-friendly.
6. Removal of fill from wetlands, intertidal habitats and floodplains.
7. Removal of invasive plant species.
8. Retrofitting of existing impervious surfaces to include stormwater treatment and flow control.
9. Regrading of the site and reconnection of local freshwater sources to re-create a tidal lagoon system with an opening at the north end of the point.
10. Explanation of how active or passive public access within 200 feet of the shoreline will serve and balance recreation, education and conservation objectives.

**20.92.060 Site and Building Sustainability Standards**

A. All structures above 65 feet in height shall meet at least Leadership in Energy Efficiency and Design (LEED) Silver Certification or equivalent standard.

B. All structures above 35 feet in height shall meet at least LEED Bronze or Built Green Three Star or equivalent standard.

C. Low impact development techniques shall be incorporated in site design including, but not limited to, rain gardens, permeable pavement, rainwater harvesting, vegetated roof(s), bike racks, and the use of non-invasive species in landscaping.

### 20.92.070 Site and Building Development Standards

A. Maximum building height

1. Maximum building height of structures in PLA 1A is as follows:
   a. Within 100 feet of the Ordinary High Tide (OHT) of Puget Sound: 10 feet.
   b. Between 100 and 200 feet of the OHT of Puget Sound: 25 feet.
   c. Between 200 and 300 feet of the OHT of Puget Sound: 65 feet.
   d. Between 300 and 400 feet of the OHT of Puget Sound: 90 feet.
   e. More than 400 feet from the OHT of Puget Sound: 180 feet, provided that no portion of a structure within the public view corridor shall exceed 35 feet. See Fig. 1.
2. Maximum building height of any structure in PLA 1B: 35 feet.
3. Maximum building height of any structure in PLA 1C: 65 feet.

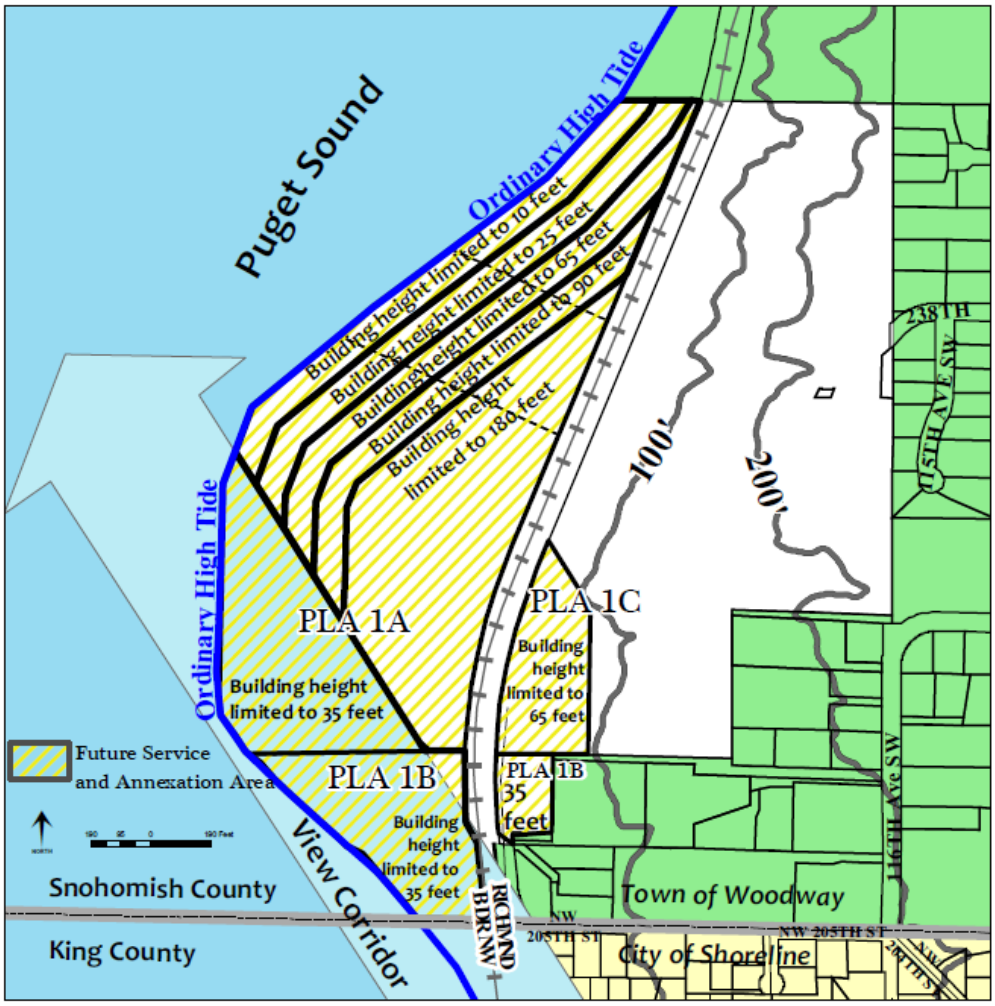



**Fig. 1 – Height Limits in Planned Area 1**

B. Maximum floor plate

1. The maximum floor plate for any portion of a building taller than 35 feet is 10,000 square feet.
2. The maximum floor plate for any portion of a building between 35 feet and 65 feet in height is 30,000 square feet.
3. There is no maximum floor plate for any building less than 35 feet in height.

C. Minimum separation of tall buildings

No portion of any building that is taller than 65 feet may be closer than 100 feet to any portion of any other building that is taller than 65 feet.

D. Parking

1. At least 90% of all parking on site shall be in structures.
2. Any parking not in structures shall be screened consistent with SMC 20.50.470.
3. The parking ratios for uses set forth in SMC 20.50 Subchapter 6 shall apply, unless modified by the Director for good cause.

E. Signs

1. A master sign plan shall be submitted and approved with any application for ADR.
2. Building name signs shall have a maximum sign area of 100 square feet.
3. Window signs may occupy a maximum of 50% of the window area.
4. Sandwich board signs are prohibited.
5. Blade signs shall have a minimum clearance of 7 feet.

F. Dark skies lighting

1. All building entrances shall be well lit to provide inviting access and safety. Building-mounted lights and display window lights shall contribute to lighting of pedestrian walkways and gathering areas.
2. Parking light post height shall not exceed 25 feet
3. Outside lighting shall be minimum wattage metal halide or color corrected sodium light sources which emit “natural” light. Non-color corrected low pressure sodium and mercury vapor light sources are prohibited.

4. All exterior lights shall be fitted with appropriate hoods and shielded to confine emitted light to within the site.

### 20.92.080 Site and Building Design Guidelines

Adoption and Modification of Design Guidelines **-** The Director is authorized and directed to adopt and amend Design Guidelines by Administrative Order.

### 20.92.090 Shoreline Public Access and on-site public use area(s)

A. Development shall construct a public pedestrian access trail along the entire waterfront of the subject property located generally within 50 feet of the highwater line of Puget Sound. The trail may meander, but shall meet grade and accessibility standards of the Americans with Disabilities Act, and have a minimum width of at least eight feet. The trail shall connect with the on-site pedestrian circulation system and connect to the public right-of-way of Richmond Beach Drive.

B. The City shall require that an easement document in a form acceptable to the City Attorney be recorded to secure public access between the hours of sunrise and sunset. The design of signs designating the public pedestrian access and the methods of posting the signs shall be submitted for review and approval by the Director.

C. Any development in PLA 1A that includes 500 or more dwelling units shall be served by an on-site public use area or park at least five (5) acres in size to be located primarily in PLA 1B. Said public use area or park shall be developed and open for public use in a location and design to be specifically approved by the City. A public access and use easement document in a form acceptable to the City shall be recorded. Alternatively, once improvements have been constructed by the developer and approved by the City, the area may be dedicated to the City for ownership, maintenance and operation as a park.

### 20.92.100 Mitigation of impacts

A. The environmental review for development permits pursuant to RCW 43.21C shall address both on site and off-site impacts, including but not limited to impacts on the City's road network, parks, and other municipal services and facilities.

B. Remediation of contaminated soils shall be required pursuant to state and federal standards.

C. As part of the environmental review the applicant shall fund the preparation of a Transportation Corridor Study, to be conducted under the direction of the City. The scope of the Transportation Corridor Study will include an analysis of impacts and the necessary intersection, roadway, walkway and other public

improvements needed to maintain or improve vehicular, bicycle and pedestrian safety and flow on Richmond Beach Drive, Richmond Beach Road, and NW 185th Street between SR 99 and NW 205th St.

D. The applicant shall fund improvements to the City's road network according to the schedule set forth in the final approved Transportation Corridor Study.

E. The applicant shall also submit for City review and approval a transportation demand management plan.

F. The combined maximum average daily traffic that shall be permitted to enter or exit from PLA 1A, PLA 1B, and PLA 1C is 8,500 vehicle trips.

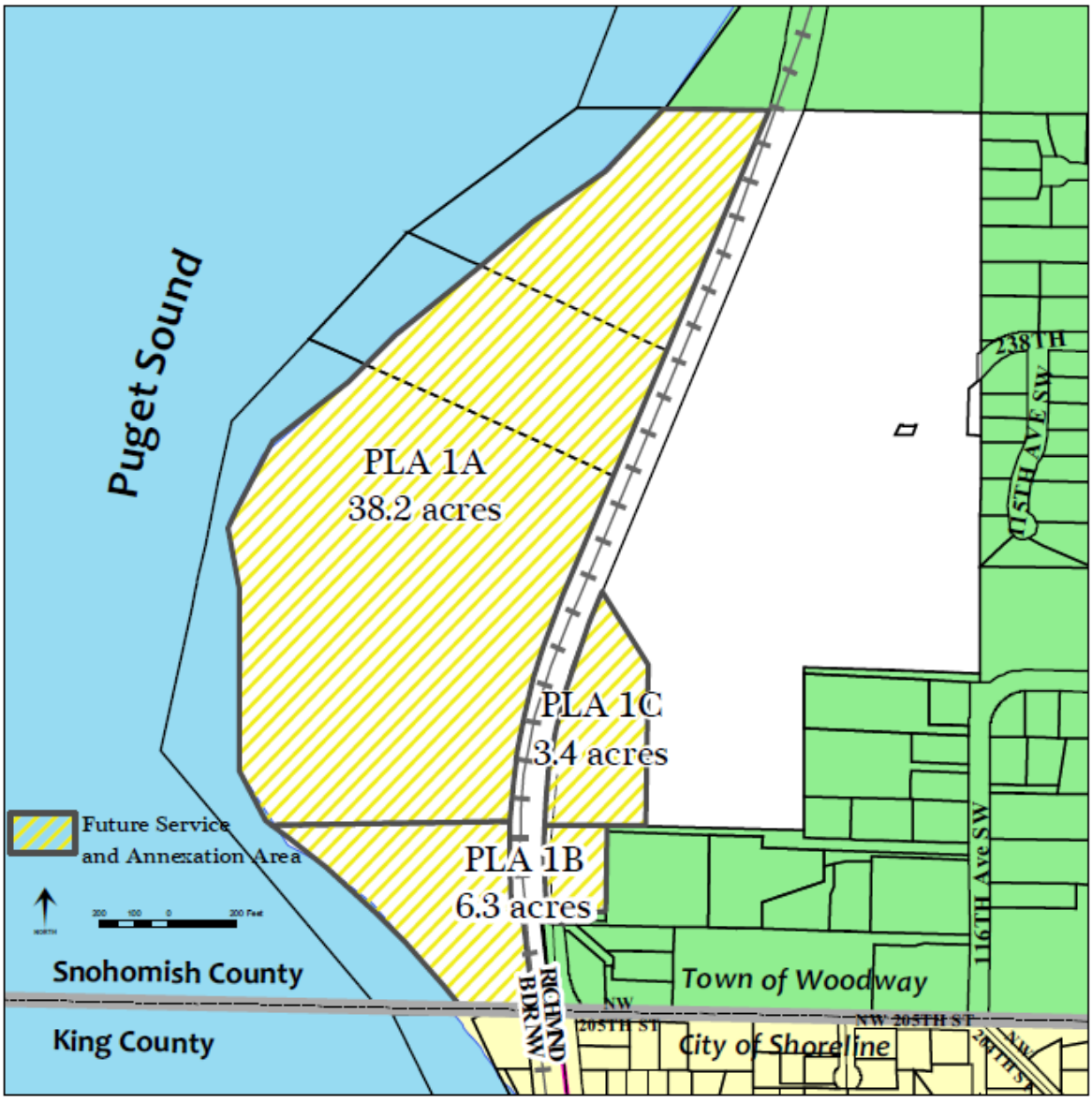
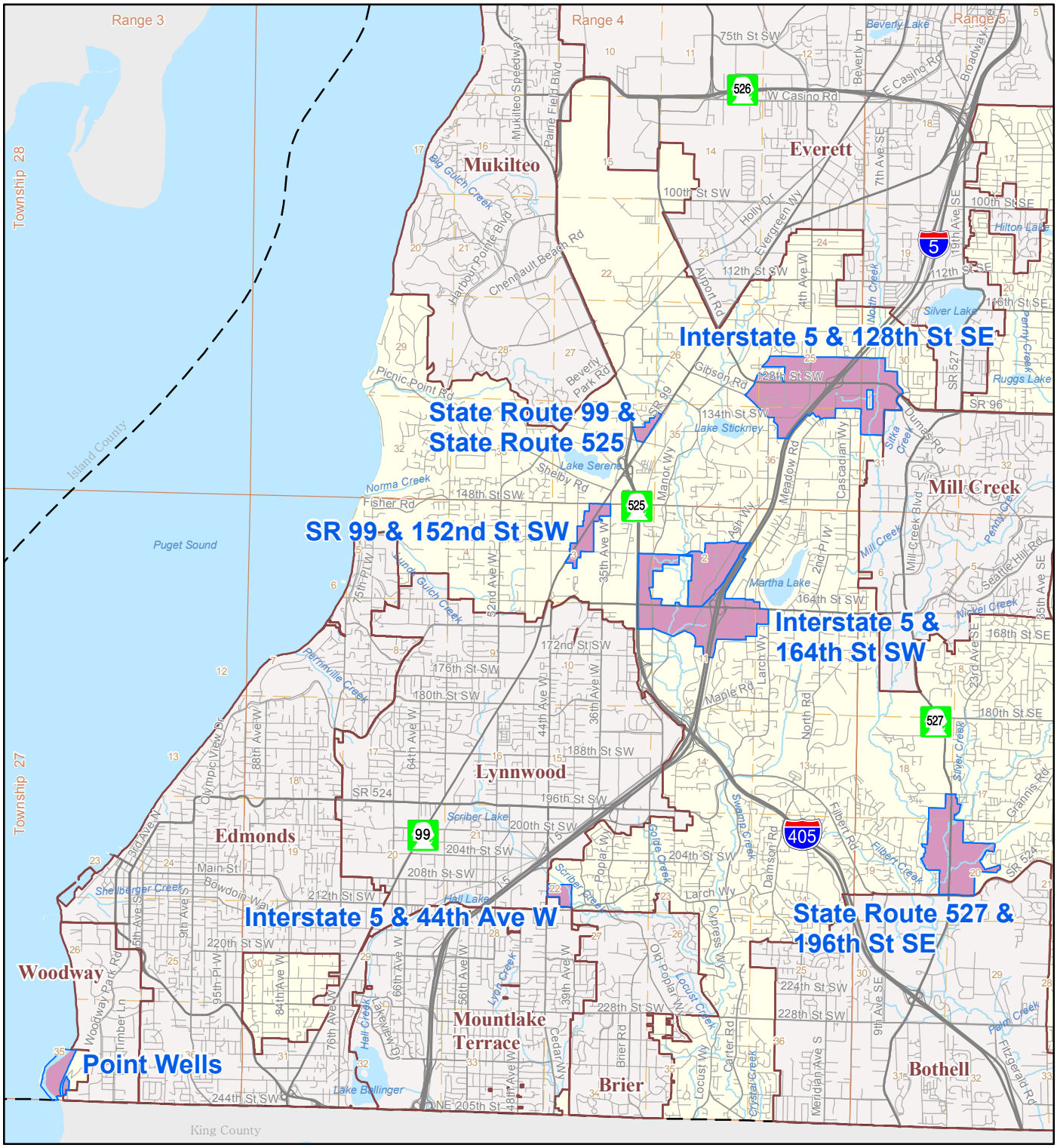



**Fig. 2 - Pre-Annexation Zoning Map for Point Wells**

# Proposed Rezones

## Urban Centers

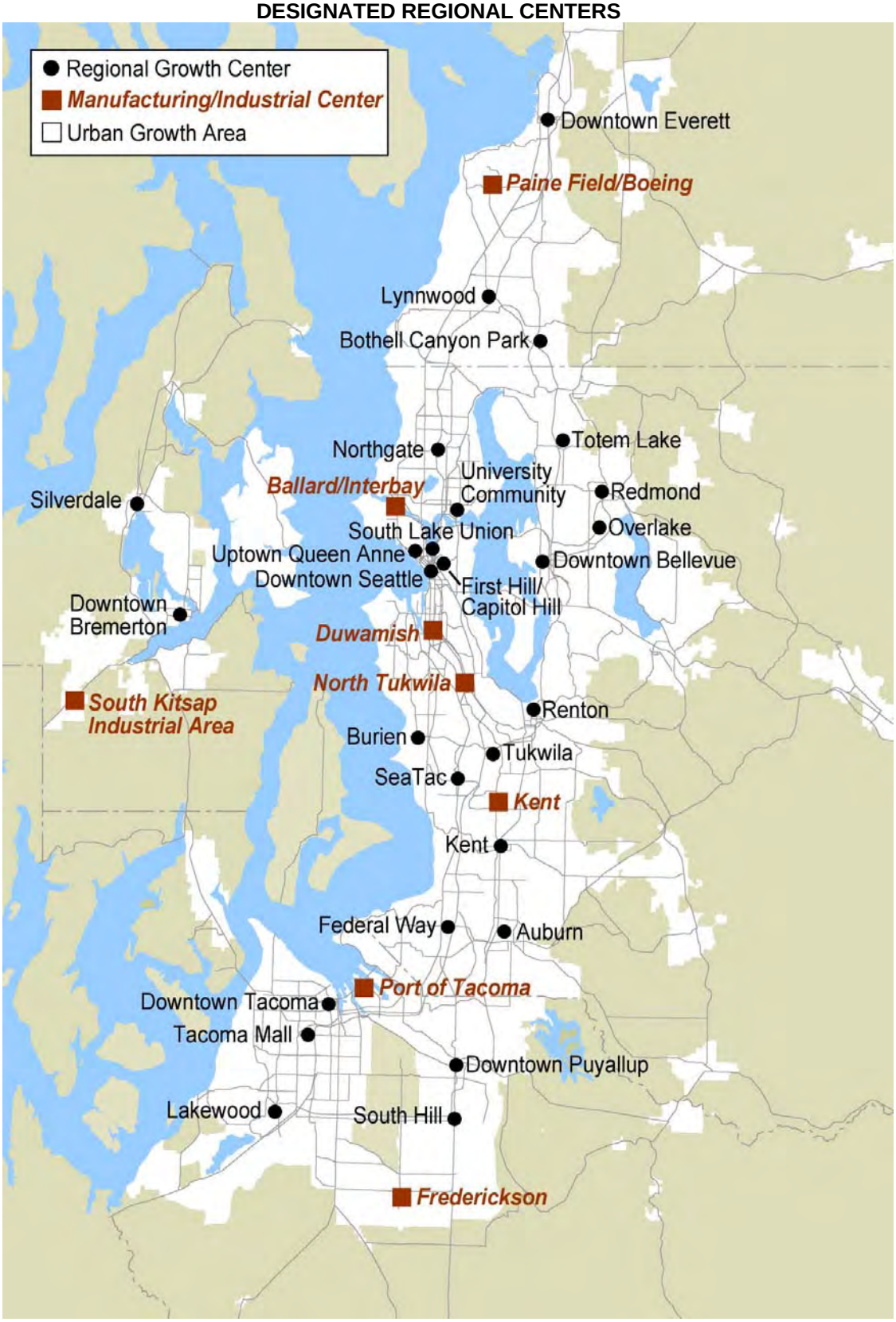
Snohomish County




Produced by Snohomish County Department of Planning and Development Services, Cartography/GIS

Map Document: (W:\plng\carto\centers\Rezone2009\Council_093009\Proposal_Maps\UrbanCenters_proposals.mxd) 9/22/2009

**DESIGNATED REGIONAL CENTERS**



| Intersection Analysis | 2007 Base - Shoreline | | | | | | | 2025 Base - Shoreline | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Intersect Capacity Utilization | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Intersect Capacity Utilization |
| | | EB | WB | NB | SB | | | | EB | WB | NB | SB | | |
| Richmond Beach Dr NW/NW 196th St | A | | A | | | 6.5 | 18.9 | A | | A | A | A | 7.4 | 21.1 |
| NW 196th St/24th Ave NW | A | A | A | A | A | 7.3 | 25.3 | A | A | A | A | A | 7.7 | 26.3 |
| NW 196th St/20th Ave NW | A | A | A | A | B | 9.1 | 39.6 | B | B | B | A | A | 7.2 | 47.2 |
| NW Richmond Bch Rd/15th Ave NW (w) | A | | | | B | 1.5 | 27.3 | A | A | A | | C | 3.6 | 32.2 |
| NW Richmond Bch Rd/15th Ave NW (e) | A | A | B | A | | 9.8 | 38.1 | A | A | A | C | | 3.8 | 45.5 |
| NW Richmond Bch Rd/8th Ave NW | C | C | C | D | D | 30.5 | 61 | D | D | D | E | D | 53.7 | 86 |
| NW Richmond Bch Rd/3rd Ave NW | A | A | A | B | B | 5.5 | 62.2 | A | A | A | B | C | 8.8 | 66.5 |
| N Richmond Bch Rd/Dayton Ave N | B | B | A | C | | 12.2 | 41.6 | B | B | A | C | | 11.3 | 50 |
| N 185th St/Fremont Ave N | C | C | C | D | D | 33.4 | 59.4 | C | C | B | D | D | 33.3 | 73.3 |
| N 185th St/Linden Ave N | C | C | B | D | D | 21.9 | 42.4 | B | A | B | D | D | 16.8 | 49.4 |
| N 185th St/Midvale Ave N | A | A | A | A | A | 6.1 | 47.7 | B | B | B | C | C | 18.9 | 61.8 |
| Aurora Ave N/N 205th St | D | F | E | B | D | 42.3 | 90 | E | F | F | E | E | 74.7 | 110.8 |
| Aurora Ave N/N 200th St | C | E | E | B | B | 29.2 | 85.9 | C | F | F | C | B | 33.7 | 95.6 |
| Aurora Ave N/N 192nd St | A | E | E | A | A | 8.7 | 61.7 | B | F | E | A | B | 14 | 75.4 |
| Aurora Ave N/N 185th St | C | E | E | C | B | 29.6 | 77.6 | D | E | F | D | C | 54.2 | 94.7 |
| Aurora Ave N/N 175th St | C | E | D | C | C | 34.2 | 75.3 | D | E | E | D | D | 50.7 | 98.1 |
| Midvale Ave N/N 175th St | B | A | A | E | E | 10.6 | 48.4 | B | B | A | C | C | 11.8 | 63.8 |
| Fremont Ave N/N 175th St | A | B | B | A | A | 7.4 | 55.9 | A | B | B | A | A | 8.1 | 63.4 |

| Arterial Route Analysis | Travel Time | Distance (mi) | Ave Speed (mph) | Arterial LOS | Travel Time | Distance (mi) | Ave Speed (mph) | Arterial LOS |
|---|---|---|---|---|---|---|---|---|
| EB NW Rchmnd Bch Rd btwn 20 Ave NW/15 Av | 45.9 | 0.3 | 23 | C | 45.9 | 0.3 | 23 | C |
| EB Richmond Bch Rd btwn 15 Ave NW/Dayton A | 217.2 | 1.4 | 22.9 | C | 247.8 | 1.4 | 20.6 | C |
| EB N 185th St btwn Dayton Ave N/Midvale Ave N | 193.5 | 0.6 | 11.3 | E | 195.1 | 0.6 | 11.2 | E |
| WB N 185th St btwn Midvale/Fremont Ave N | 178.1 | 0.4 | 8.9 | E | 207.1 | 0.4 | 7.6 | E |
| WB Richmd Bch Rd btwn Fremont/20 Ave NW | 170.4 | 1.1 | 22.5 | C | 275.4 | 1.7 | 22.1 | C |
| NB Aurora Ave N btwn N 205th St/N 175th St | 257.1 | 1.7 | 24 | C | 363.1 | 1.7 | 17 | D |
| SB Aurora Ave N btwn N 205th St/N 175th St | 240.6 | 1.7 | 24.8 | C | 276.9 | 1.7 | 21.6 | D |

| Intersection Analysis | 2025 Point Wells - 0550 trips | | | | | | | | 2025 Point Wells - 0700 trips | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization |
| | | EB | WB | NB | SB | | | | | EB | WB | NB | SB | | | |
| Richmond Beach Dr NW/NW 196th St | B | | B | A | B | 12.8 | 5.4 | 52.1 | C | | B | A | C | 16.6 | 9.2 | 61 |
| NW 196th St/24th Ave NW | B | C | B | B | A | 13.2 | 5.5 | 45.5 | C | C | C | B | A | 17.6 | 9.9 | 45.7 |
| NW 196th St/20th Ave NW | A | A | A | A | A | 8.2 | 1.0 | 62.6 | A | A | A | A | B | 8.7 | 1.5 | 66.8 |
| NW Richmond Bch Rd/15th Ave NW (w) | A | A | A | | E | 5.8 | 2.2 | 40.8 | A | A | A | | C | 3.2 | (0.4) | 42.1 |
| NW Richmond Bch Rd/15th Ave NW (e) | A | A | A | E | | 4 | 0.2 | 60.2 | A | A | A | C | | 3 | (0.8) | 64.2 |
| NW Richmond Bch Rd/8th Ave NW | E | E | D | F | D | 66 | 12.3 | 91.2 | E | E | E | F | E | 78 | 24.3 | 93.5 |
| NW Richmond Bch Rd/3rd Ave NW | A | A | A | C | C | 9.9 | 1.1 | 71.3 | B | A | A | C | C | 11.3 | 2.5 | 73.7 |
| N Richmond Bch Rd/Dayton Ave N | B | B | A | C | | 13.3 | 2.0 | 58 | B | B | A | C | | 13.4 | 2.1 | 59.4 |
| N 185th St/Fremont Ave N | D | C | D | D | D | 37.8 | 4.5 | 78.4 | D | C | B | E | E | 37.2 | 3.9 | 80.5 |
| N 185th St/Linden Ave N | A | A | A | C | C | 9.7 | (7.1) | 55 | B | A | A | D | D | 12.4 | (4.4) | 55.9 |
| N 185th St/Midvale Ave N | C | B | B | D | D | 21.5 | 2.6 | 63 | B | B | B | C | C | 19.1 | 0.2 | 63.6 |
| Aurora Ave N/N 205th St | E | F | F | E | E | 79.2 | 4.5 | 112.4 | E | F | F | E | E | 79.3 | 4.6 | 112.8 |
| Aurora Ave N/N 200th St | C | F | F | C | B | 34.9 | 1.2 | 97.6 | D | F | E | D | B | 38.3 | 4.6 | 98 |
| Aurora Ave N/N 192nd St | B | F | E | A | B | 14.6 | 0.6 | 77.2 | B | F | E | A | B | 13.9 | (0.1) | 77.5 |
| Aurora Ave N/N 185th St | D | F | F | D | C | 53.8 | (0.4) | 98.7 | D | F | F | D | D | 54.5 | 0.3 | 99.5 |
| Aurora Ave N/N 175th St | D | F | F | D | C | 50.8 | 0.1 | 101.1 | D | F | F | D | C | 50.7 | 0.0 | 102.2 |
| Midvale Ave N/N 175th St | B | A | A | F | F | 14.5 | 2.7 | 64.9 | B | A | A | F | F | 14.4 | 2.6 | 65.1 |
| Fremont Ave N/N 175th St | A | B | B | A | A | 8.1 | 0.0 | 64.5 | A | B | B | A | A | 9.5 | 1.4 | 64.7 |

| Arterial Route Analysis | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS |
|---|---|---|---|---|---|---|---|---|---|---|
| EB NW Rchmnd Bch Rd btwn 20 Ave NW/15 Av | 47.5 | 0.3 | 22.2 | (0.8) | C | 47.3 | 0.3 | 22.3 | (0.7) | C |
| EB Richmond Bch Rd btwn 15 Ave NW/Dayton A | 251.4 | 1.4 | 20.3 | (0.3) | C | 276.2 | 1.4 | 18.5 | (2.1) | C |
| EB N 185th St btwn Dayton Ave N/Midvale Ave N | 207.6 | 0.6 | 10.5 | (0.7) | E | 193.6 | 0.6 | 11.3 | 0.1 | E |
| WB N 185th St btwn Midvale/Fremont Ave N | 234.5 | 0.4 | 6.7 | (0.9) | F | 210.6 | 0.4 | 7.5 | (0.1) | E |
| WB Richmd Bch Rd btwn Fremont/20 Ave NW | 274.1 | 1.7 | 22.2 | 0.1 | C | 301.5 | 1.7 | 20.2 | (1.9) | C |
| NB Aurora Ave N btwn N 205th St/N 175th St | 366.9 | 1.7 | 16.8 | (0.2) | E | 380.5 | 1.7 | 16.2 | (0.8) | E |
| SB Aurora Ave N btwn N 205th St/N 175th St | 272.5 | 1.7 | 21.9 | 0.3 | D | 281.5 | 1.7 | 21.2 | (0.4) | D |

| Intersection Analysis | 2025 Point Wells - 0825 trips | | | | | | | | 2025 Point Wells - 0950 trips | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization |
| | | EB | WB | NB | SB | | | | | EB | WB | NB | SB | | | |
| Richmond Beach Dr NW/NW 196th St | C | | C | A | D | 22.9 | 15.5 | 68.5 | E | | D | A | E | 36.6 | 29.2 | 76 |
| NW 196th St/24th Ave NW | D | D | D | B | B | 25.3 | 17.6 | 45.9 | E | E | F | B | B | 43.2 | 35.5 | 49 |
| NW 196th St/20th Ave NW | A | A | A | A | B | 9.2 | 2.0 | 70.2 | A | A | B | B | B | 9.6 | 2.4 | 73.8 |
| NW Richmond Bch Rd/15th Ave NW (w) | A | A | A | | C | 3.4 | (0.2) | 43.1 | A | A | A | | C | 3.1 | (0.5) | 44.2 |
| NW Richmond Bch Rd/15th Ave NW (e) | A | A | A | C | | 3 | (0.8) | 67.5 | A | A | A | C | | 3.1 | (0.7) | 70.8 |
| NW Richmond Bch Rd/8th Ave NW | E | E | E | F | E | 76.6 | 22.9 | 95.5 | F | E | F | F | E | 83.6 | 29.9 | 97.4 |
| NW Richmond Bch Rd/3rd Ave NW | B | A | A | C | D | 12.3 | 3.5 | 76.8 | B | A | A | C | D | 13.7 | 4.9 | 78.7 |
| N Richmond Bch Rd/Dayton Ave N | B | B | A | C | | 13.5 | 2.2 | 60.5 | B | B | A | C | | 13.6 | 2.3 | 61.7 |
| N 185th St/Fremont Ave N | D | C | C | E | E | 38.8 | 5.5 | 82.3 | D | C | C | E | E | 40.8 | 7.5 | 84.1 |
| N 185th St/Linden Ave N | B | A | A | D | D | 11.8 | (5.0) | 56.6 | B | A | A | D | D | 11.9 | (4.9) | 57.4 |
| N 185th St/Midvale Ave N | B | B | B | C | C | 18.6 | (0.3) | 64 | B | B | B | C | C | 18.7 | (0.2) | 64.5 |
| Aurora Ave N/N 205th St | F | F | F | E | E | 80.5 | 5.8 | 113 | F | F | F | F | E | 82.4 | 7.7 | 113.3 |
| Aurora Ave N/N 200th St | D | F | F | C | B | 35.7 | 2.0 | 98.3 | D | F | F | C | B | 36 | 2.3 | 98.6 |
| Aurora Ave N/N 192nd St | B | F | E | A | B | 14.8 | 0.8 | 77.7 | B | F | E | A | B | 14.8 | 0.8 | 77.9 |
| Aurora Ave N/N 185th St | E | F | F | D | D | 59.5 | 5.3 | 100.1 | E | F | F | D | D | 62.2 | 8.0 | 101.7 |
| Aurora Ave N/N 175th St | D | F | F | D | C | 51.3 | 0.6 | 102.9 | D | F | F | D | | 54 | 3.3 | 103.8 |
| Midvale Ave N/N 175th St | B | A | A | F | F | 14.3 | 2.5 | 65.2 | A | A | A | D | D | 9.6 | (2.2) | 65.4 |
| Fremont Ave N/N 175th St | A | B | B | A | A | 8.1 | 0.0 | 64.9 | A | B | B | A | A | 8.1 | 0.0 | 65.2 |

| Arterial Route Analysis | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS |
|---|---|---|---|---|---|---|---|---|---|---|
| EB NW Rchmnd Bch Rd btwn 20 Ave NW/15 Av | 47.5 | 0.3 | 22.2 | (0.8) | C | 47.4 | 0.3 | 22.3 | (0.7) | C |
| EB Richmond Bch Rd btwn 15 Ave NW/Dayton A | 255.3 | 1.4 | 20 | (0.6) | C | 259.5 | 1.4 | 19.7 | (0.9) | C |
| EB N 185th St btwn Dayton Ave N/Midvale Ave N | 194.8 | 0.6 | 11.2 | 0.0 | E | 195.8 | 0.6 | 11.1 | (0.1) | E |
| WB N 185th St btwn Midvale/Fremont Ave N | 229.8 | 0.4 | 6.9 | (0.7) | F | 239.9 | 0.4 | 6.6 | (1.0) | F |
| WB Richmd Bch Rd btwn Fremont/20 Ave NW | 312.2 | 1.7 | 19.5 | (2.6) | C | 322.7 | 1.7 | 18.9 | (3.2) | C |
| NB Aurora Ave N btwn N 205th St/N 175th St | 376.6 | 1.7 | 16.4 | (0.6) | E | 384.4 | 1.7 | 16.1 | (0.9) | E |
| SB Aurora Ave N btwn N 205th St/N 175th St | 291.4 | 1.7 | 20.5 | (1.1) | D | 292.3 | 1.7 | 20.4 | (1.2) | D |

| Intersection Analysis | 2025 Point Wells - 1100 trips | | | | | | | | 2025 Point Wells - 1225 trips | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization |
| | | EB | WB | NB | SB | | | | | EB | WB | NB | SB | | | |
| Richmond Beach Dr NW/NW 196th St | F | | F | A | F | 71.6 | 64.2 | 84.9 | F | | F | A | F | 101.6 | 94.2 | 92.4 |
| NW 196th St/24th Ave NW | F | F | F | B | B | 77.8 | 70.1 | 54 | F | F | F | B | B | 113.2 | 105.5 | 58.4 |
| NW 196th St/20th Ave NW | B | A | B | B | B | 10.1 | 2.9 | 78 | B | A | B | B | B | 10.4 | 3.2 | 81.5 |
| NW Richmond Bch Rd/15th Ave NW (w) | A | A | A | | C | 3.2 | (0.4) | 46.3 | A | A | A | | C | 3 | (0.6) | 48.6 |
| NW Richmond Bch Rd/15th Ave NW (e) | A | A | A | C | | 3.8 | 0.0 | 74.8 | A | A | A | C | | 3.4 | (0.4) | 78.2 |
| NW Richmond Bch Rd/8th Ave NW | F | E | F | F | E | 88.1 | 34.4 | 99.6 | F | E | F | F | E | 94.5 | 40.8 | 101.6 |
| NW Richmond Bch Rd/3rd Ave NW | B | A | A | C | D | 14.5 | 5.7 | 80.9 | B | B | A | C | D | 15.8 | 7.0 | 82.9 |
| N Richmond Bch Rd/Dayton Ave N | B | B | A | C | | 14.1 | 2.8 | 63.2 | B | B | A | C | | 14.5 | 3.2 | 64.3 |
| N 185th St/Fremont Ave N | D | C | C | E | E | 43.8 | 10.5 | 86.2 | D | C | D | E | E | 47.7 | 14.4 | 88 |
| N 185th St/Linden Ave N | B | A | A | D | D | 11.6 | (5.2) | 58.9 | B | A | A | D | D | 11.3 | (5.5) | 60.2 |
| N 185th St/Midvale Ave N | B | B | B | C | C | 19.2 | 0.3 | 64.9 | B | B | B | C | C | 19.4 | 0.5 | 65.4 |
| Aurora Ave N/N 205th St | F | F | F | F | E | 81.5 | 6.8 | 113.6 | F | F | F | F | E | 82.2 | 7.5 | 113.9 |
| Aurora Ave N/N 200th St | D | F | F | D | B | 40.8 | 7.1 | 99.1 | D | F | F | D | B | 41.9 | 8.2 | 99.4 |
| Aurora Ave N/N 192nd St | B | F | E | A | C | 15.7 | 1.7 | 78.2 | B | F | E | A | C | 15.5 | 1.5 | 78.5 |
| Aurora Ave N/N 185th St | E | F | F | D | E | 65.4 | 11.2 | 103.7 | E | F | F | D | E | 69.2 | 15.0 | 105.5 |
| Aurora Ave N/N 175th St | D | F | F | D | C | 54 | 3.3 | 104.8 | E | F | F | D | C | 55.5 | 4.8 | 105.6 |
| Midvale Ave N/N 175th St | B | A | A | D | D | 10.5 | (1.3) | 65.6 | A | A | A | D | D | 9.6 | (2.2) | 65.7 |
| Fremont Ave N/N 175th St | A | B | B | A | A | 8.1 | 0.0 | 65.4 | A | B | B | A | A | 8.2 | 0.1 | 65.6 |

| Arterial Route Analysis | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS |
|---|---|---|---|---|---|---|---|---|---|---|
| EB NW Rchmnd Bch Rd btwn 20 Ave NW/15 Av | 47.2 | 0.3 | 22.4 | (0.6) | C | 46.9 | 0.3 | 22.5 | (0.5) | C |
| EB Richmond Bch Rd btwn 15 Ave NW/Dayton A | 261.6 | 1.4 | 19.6 | (1.0) | C | 260 | 1.4 | 19.7 | (0.9) | C |
| EB N 185th St btwn Dayton Ave N/Midvale Ave N | 196.6 | 0.6 | 11.1 | (0.1) | E | 198.1 | 0.6 | 11 | (0.2) | E |
| WB N 185th St btwn Midvale/Fremont Ave N | 249.7 | 0.4 | 6.3 | (1.3) | F | 264.9 | 0.4 | 6 | (1.6) | F |
| WB Richmd Bch Rd btwn Fremont/20 Ave NW | 328.3 | 1.7 | 18.6 | (3.5) | C | 342.4 | 1.7 | 17.8 | (4.3) | D |
| NB Aurora Ave N btwn N 205th St/N 175th St | 403 | 1.7 | 15.3 | (1.7) | E | 407.5 | 1.7 | 15.2 | (1.8) | E |
| SB Aurora Ave N btwn N 205th St/N 175th St | 301.2 | 1.7 | 19.8 | (1.8) | D | 311.3 | 1.7 | 19.2 | (2.4) | D |

| Intersection Analysis | 2025 Point Wells - 1286 trips | | | | | | | | 2025 Point Wells - 1350 trips | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization | Overall LOS | Approach LOS | | | | Ave Intersect Delay (sec) | Diff from 2025 base | Intersect Capacity Utilization |
| | | EB | WB | NB | SB | | | | | EB | WB | NB | SB | | | |
| Richmond Beach Dr NW/NW 196th St | F | | F | A | F | 120.7 | 113.3 | 96 | F | | F | A | F | 142 | 134.6 | 99.9 |
| NW 196th St/24th Ave NW | F | F | F | B | B | 130.8 | 123.1 | 60.2 | F | F | F | B | B | 154.5 | 146.8 | 62.9 |
| NW 196th St/20th Ave NW | B | A | B | B | B | 10.6 | 3.4 | 83.2 | B | A | B | B | B | 11 | 3.8 | 85 |
| NW Richmond Bch Rd/15th Ave NW (w) | A | A | A | | C | 3 | (0.6) | 49.5 | A | A | A | | C | 4.3 | 0.7 | 50.8 |
| NW Richmond Bch Rd/15th Ave NW (e) | A | A | A | C | | 3.5 | (0.3) | 79.8 | A | A | A | C | | 4.6 | 0.8 | 81.5 |
| NW Richmond Bch Rd/8th Ave NW | F | E | F | F | E | 97.6 | 43.9 | 102.4 | F | E | F | F | F | 97.3 | 43.6 | 103.6 |
| NW Richmond Bch Rd/3rd Ave NW | B | B | A | C | D | 16.6 | 7.8 | 83.7 | B | B | B | C | D | 15.8 | 7.0 | 84.8 |
| N Richmond Bch Rd/Dayton Ave N | B | B | B | C | | 14.8 | 3.5 | 65 | B | B | B | C | | 15 | 3.7 | 65.5 |
| N 185th St/Fremont Ave N | D | C | D | E | E | 49.3 | 16.0 | 88.7 | D | C | C | E | F | 49.8 | 16.5 | 89.8 |
| N 185th St/Linden Ave N | B | A | A | D | D | 10.8 | (6.0) | 60.8 | B | A | A | D | D | 11.1 | (5.7) | 61.7 |
| N 185th St/Midvale Ave N | B | B | B | C | C | 19.4 | 0.5 | 65.6 | B | B | B | C | C | 19.4 | 0.5 | 65.8 |
| Aurora Ave N/N 205th St | F | F | F | F | E | 82.6 | 7.9 | 114.1 | F | F | F | F | E | 82.9 | 8.2 | 114.2 |
| Aurora Ave N/N 200th St | D | F | F | D | B | 42.3 | 8.6 | 99.6 | D | F | F | D | B | 43 | 9.3 | 99.7 |
| Aurora Ave N/N 192nd St | B | F | E | A | C | 16.1 | 2.1 | 78.6 | B | F | E | A | C | 16 | 2.0 | 78.7 |
| Aurora Ave N/N 185th St | E | F | F | D | E | 71.6 | 17.4 | 106.3 | E | F | F | D | E | 71 | 16.8 | 107.2 |
| Aurora Ave N/N 175th St | E | F | F | D | C | 56.1 | 5.4 | 105.9 | E | F | F | D | C | 56.5 | 5.8 | 106.5 |
| Midvale Ave N/N 175th St | A | A | A | D | D | 9.6 | (2.2) | 65.8 | A | A | A | D | D | 9.6 | (2.2) | 65.9 |
| Fremont Ave N/N 175th St | A | B | B | A | A | 8.2 | 0.1 | 65.7 | A | B | B | A | A | 8.2 | 0.1 | 65.8 |

| Arterial Route Analysis | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS | Travel Time | Distance (mi) | Ave Speed (mph) | Diff in Travel Time | Arterial LOS |
|---|---|---|---|---|---|---|---|---|---|---|
| EB NW Rchmnd Bch Rd btwn 20 Ave NW/15 Av | 47 | 0.3 | 22.5 | (0.5) | C | 47.1 | 0.3 | 22.4 | (0.6) | C |
| EB Richmond Bch Rd btwn 15 Ave NW/Dayton A | 261.5 | 1.4 | 19.6 | (1.0) | C | 259.4 | 1.4 | 19.7 | (0.9) | C |
| EB N 185th St btwn Dayton Ave N/Midvale Ave N | 198.7 | 0.6 | 11 | (0.2) | E | 199.5 | 0.6 | 10.9 | (0.3) | E |
| WB N 185th St btwn Midvale/Fremont Ave N | 270.9 | 0.4 | 5.8 | (1.8) | F | 267.9 | 0.4 | 5.9 | (1.7) | F |
| WB Richmd Bch Rd btwn Fremont/20 Ave NW | 350.8 | 1.7 | 17.4 | (4.7) | D | 347.9 | 1.7 | 17.5 | (4.6) | D |
| NB Aurora Ave N btwn N 205th St/N 175th St | 410.7 | 1.7 | 15.1 | (1.9) | E | 410.1 | 1.7 | 15.1 | (1.9) | E |
| SB Aurora Ave N btwn N 205th St/N 175th St | 316.2 | 1.7 | 18.9 | (2.7) | D | 311.6 | 1.7 | 19.2 | (2.4) | D |



*printed 11/24/2009*

Richmond Beach Rd - Point Wells Impact Analysis Model
PM Peak Hour Volumes

| Arterial Route Analysis | 2007 Base - Shoreline | | | 2025 Point Wells - 0550 trips | | | | 2025 Point Wells - 0825 trips | | | | 2025 Point Wells - 1100 trips | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base |
| Richmond Beach Dr btwn NW 205 St/NW 204th St | 20 | 41 | 61 | 249 | 400 | 649 | 550 | 434 | 490 | 924 | 825 | 614 | 585 | 1,199 | 1,100 |
| Richmond Bch Rd btwn 20 Ave NW/15 Ave NW | 393 | 310 | 703 | 697 | 683 | 1,380 | 535 | 878 | 770 | 1,648 | 803 | 1,055 | 862 | 1,917 | 1,072 |
| Richmond Bch Rd btwn 8th Ave NW/3rd Ave NW | 726 | 529 | 1,255 | 1,145 | 866 | 2,011 | 465 | 1,300 | 943 | 2,243 | 697 | 1,451 | 1,024 | 2,475 | 929 |
| N 185th St btwn Fremont/Linden Ave N | 510 | 535 | 1,045 | 934 | 944 | 1,878 | 342 | 1,047 | 1,000 | 2,047 | 511 | 1,156 | 1,060 | 2,216 | 680 |

| Arterial Route Analysis | 2025 Base - Shoreline | | | 2025 Point Wells - 0700 trips | | | | 2025 Point Wells - 0950 trips | | | | 2025 Point Wells - 1225 trips | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base |
| Richmond Beach Dr btwn NW 205 St/NW 204th St | 24 | 75 | 99 | 349 | 450 | 799 | 700 | 519 | 530 | 1,049 | 950 | 699 | 625 | 1,324 | 1,225 |
| Richmond Bch Rd btwn 20 Ave NW/15 Ave NW | 477 | 368 | 845 | 795 | 731 | 1,526 | 681 | 962 | 809 | 1,771 | 926 | 1,138 | 901 | 2,039 | 1,194 |
| Richmond Bch Rd btwn 8th Ave NW/3rd Ave NW | 956 | 590 | 1,546 | 1,229 | 909 | 2,138 | 592 | 1,371 | 977 | 2,348 | 802 | 1,523 | 1,058 | 2,581 | 1,035 |
| N 185th St btwn Fremont/Linden Ave N | 797 | 739 | 1,536 | 995 | 975 | 1,970 | 434 | 1,098 | 1,026 | 2,124 | 588 | 1,208 | 1,086 | 2,294 | 758 |



*printed 11/24/2009*

Richmond Beach Rd - Point Wells Impact Analysis Model
PM Peak Hour Volumes

| Arterial Route Analysis | 2025 Point Wells - 1286 trips | | | | 2025 Point Wells - 1350 trips | | | |
|---|---|---|---|---|---|---|---|---|
| | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base | Inbound (WB) | Outbound (EB) | Total (PM Peak) | Difference from 2025 base |
| Richmond Beach Dr btwn NW 205 St/NW 204th St | 733 | 652 | 1,385 | 1,286 | 784 | 665 | 1,449 | 1,350 |
| Richmond Bch Rd btwn 20 Ave NW/15 Ave NW | 1,171 | 927 | 2,098 | 1,253 | 1,221 | 940 | 2,161 | 1,316 |
| Richmond Bch Rd btwn 8th Ave NW/3rd Ave NW | 1,551 | 1,080 | 2,631 | 1,085 | 1,594 | 1,092 | 2,686 | 1,140 |
| N 185th St btwn Fremont/Linden Ave N | 1,229 | 1,102 | 2,331 | 795 | 1,260 | 1,111 | 2,371 | 835 |

| Arterial Route Analysis |
|---|
| Richmond Beach Dr btwn NW 205 St/NW 204th St |
| Richmond Bch Rd btwn 20 Ave NW/15 Ave NW |
| Richmond Bch Rd btwn 8th Ave NW/3rd Ave NW |
| N 185th St btwn Fremont/Linden Ave N |

-----Original Message-----
**From:** Hauss, Bertrand [mailto:hauss@ci.edmonds.wa.us]
**Sent:** Monday, November 23, 2009 11:38 AM
**To:** Miranda Redinger; mredinger@shoreline.wa.gov
**Cc:** English, Robert
**Subject:** Edmonds comments regarding the SEIS for Point Wells

Good morning,

Here are additions from the City of Edmonds regarding the Shoreline SEIS for Point Wells:

The Point Wells development will also have a traffic impact on Edmonds City Streets. Many drivers will use alternates to Richmond Beach Rd, as they will travel the following streets to go to / from Point Wells:
- SR-104 to / from the Edmonds Ferry Terminal / Edmonds area,
- Hwy. 99 to / from adjacent jurisdictions to the north (Lynnwood), and
- local streets like 100th Av. W (extension of 8th Av. W), 3rd Av. NW, Fremont Av. N. (both intersect 244th St. SW to then gain access to Hwy. 99 / I-5).

Those increases would then worsen the LOS and potentially create deficiencies at those intersections by exceeding the City LOS Standards (LOS D). The following intersections should be added as mitigation projects to be evaluated as part of the same study mentioned on page 6 (to be conducted by Developer):

1/ ***Hwy. 99 @ 205th St./ 244th St. SW***: according to the 2009 Transportation Plan model, the LOS by 2025 will be D. This is also the 2nd highest collision intersection in the City. With this development, the intersection volumes will increase for both the EB (from Point Wells) and SB (to Point Wells) movements, potentially increasing the intersection LOS to E.

2/ As indicated in the SEIS, a mitigation is identified at the intersection of Richmond Beach Rd. @ 8th Avenue NW. This added volume on 8th Av. NW will also generate an increase in volume at the intersection of ***100th @ 238th St. SW***. According to the 2009 Transportation Plan model, the LOS by 2025 will be C. With the development, the volumes will possibly increase the LOS to D.

3/ ***SR-104 @ 100th Av. W:*** according to the 2009 Transportation Plan model, the LOS by 2025 will be D. It is the 6th highest collision intersection in the City. The development will increase the intersection delay.

4/ ***SR-104 @ 226th St. SW:*** this will experience increase in volume for both SB movement on SR-104 and EB movement on 226th St. SW as Point Wells can be accessed by going to 106th Av. W (Edmonds), 104th Av. W (Shoreline), and 12th Av. NW (Shoreline).

5/ The City of Shoreline may want to add the impacts at the intersection of ***Firdale Av. @ 244th St. SW*** since the EB movement on 244th St. SW already gets high volume.

The City would like those traffic concerns evaluated and added in the SEIS, as the traffic impacts due to the development go much further than only the adjacent jurisdictions.

Thanks and please let me know if you have any questions regarding these comments.

Bertrand Hauss, PE
Transportation Engineer
City of Edmonds
(425) 771-0220

**To: Miranda Redinger, City of Shoreline** **November 25, 2009**

**From: Donald W. Ding**
**110 NW 171st ST.**
**Shoreline, WA 98177-3613**



**RE: Draft SEIS Point Wells Subarea Plan and Pre-annexation Zoning**

Thank you for the opportunity to comment on the DSEIS.

I live at 110 NW 171st St., City of Shoreline, and have been a resident there for 33 years. My sons both graduated from the Shoreline School District and my spouse has worked at Shoreline Community College for 20 years. During my career I worked for 35 years as a transportation planner on a diverse variety of transportation projects including the review of development proposals and transportation impacts for King County. Some of the major projects I participated on were the Bear Creek Urban Planned Developments (Redmond Ridge and Trilogy), a fully contained community development east of Redmond consisting of 4700 mixed family dwelling units, Klahanie and Issaquah Highlands. I also worked on multimodal projects, growth management, a variety of community plans and transportation capital projects.

I am concerned about the level of development at Pt. Wells and the impacts it will have on surrounding neighborhoods. Growth should be allowed when it is consistent with adopted policies (at regional and local levels) and is appropriately scaled and does not adversely impact the environment and community. If it is to occur, it should be done with sensitivity to the environment and affected neighborhoods and with mitigation to minimize negative impacts.

Upon reviewing the DSEIS and traffic study, I would like to have the following comments addressed. Some reference is made in comparison with information from the Snohomish County traffic study.

**1. Growth and consistency with adopted plans**

Is the proposal consistent with growth plans, as prescribed by the Washington State Growth Management Act (GMA), growth policies of the Puget Sound Regional Council as set forth in Multi-County Planning Policies, King County Countywide Planning Policies, The Shoreline Comprehensive Plan, and neighborhood plans? Is the proposal consistent with the growth targets of the City? Do we need to accommodate the additional growth created by Pt. Wells? If not, there should be a lesser mandate and greater scrutiny in seeking more growth. Does the City have level-of-service standards (RCW 36.70A.070(6)(a)) for transportation that apply and have impacts on State facilities (including SR-99, SR-104 and I-5) (RCW 36.70A.070(6)(a)) been identified and mitigated?

**2. Transportation and traffic impacts**

a. The trip generation rates in the DSEIS, table page 7 appear to be inconsistent with the Institute of Transportation Engineers (ITE) Trip Generation Manual, 7th Edition, Land Use Code 230.

Trip generation rates appear to be significantly lower than ITE. For instance, according to the DSEIS table, 500 residential units generate only 195 p.m. peak entering/exiting trips while, based on the ITE manual, 500 units at 5.81 trips daily and 0.52 p.m. peak hour trips per dwelling unit would produce (500x5.81=2905 daily trips) 260 p.m. peak period trips (500x0.52). There is a discrepancy of 65 peak hour trips representing an underestimation of 33%. This significantly worsens with larger phases of development.

The following table compares trip generation rates based on calculations from the ITE Trip Generation Manual, 8th edition for only the residential trips. This illustrates the discrepancy in trip generation numbers between the DSEIS and direct calculations from the Manual. If there are undocumented assumptions used in the DSEIS, they should be included. Additionally, little information was included in the DSEIS for the office/retail use, aside from the number of total employees. Additional information should be provided on trip generation for the office/retail use (which may be similarly low.)

Comparison of Trip Generation based on ITE 8th edition (0.52 trips/unit, 64% entering/36% exiting) vs. DSEIS-P.M. Peak Hour of Generator- **Are DSEIS trips too low?**

| Res. Units | **ITE-8th Edition Total Pk. Trips** | DSEIS Total Pk. Trips | **ITE-8th Edition Entering Trips** | DSEIS Entering Trips | **ITE 8th Edition Exiting Trips** | DSEIS Exiting Trips |
|---|---|---|---|---|---|---|
| 500 | **260** | 195 | **166** | 131 | **94** | 64 |
| 1000 | **520** | 345 | **333** | 231 | **187** | 114 |
| 1500 | **780** | 481 | **499** | 322 | **281** | 159 |
| 2000 | **1040** | 608 | **666** | 408 | **374** | 200 |
| 2500 | **1300** | 730 | **832** | 489 | **468** | 241 |
| 3000 | **1560** | 848 | **998** | 568 | **562** | 280 |
| 3500 | **1820** | 899 | **1165** | 602 | **655** | 297 |
| 4000 | **2080** | 963 | **1331** | 645 | **749** | 318 |

Comparing the ITE 8th edition trips to the DSEIS shows a significant discrepancy in total peak hour trips ranging from 33% (260 vs.195 trips) more trips for 500 units to 102% (1820 vs. 899 trips) more trips for 3500 units. This creates a significant difference and becomes very meaningful when analyzing trip impacts. **Thus, all the traffic impact analysis may be very low**.

There is also an inconsistency between the DSEIS table and the Snohomish County table for the last two values for residential units (3500 and 4000 units vs. 3220 and 3500 respectively.) Other numbers are the same, so it appears a typo problem may have occurred.

b. The trip distribution is not discussed in the DSEIS- concern for traffic diverting through neighborhoods using other streets. Trip diversion from Richmond Beach Rd./185th should be analyzed and mitigated. Just because trips divert from Richmond Beach Rd./185th does not mean their impacts should be discounted. There is a varying degree in the level of divergence trips

between the City (40%)and Snohomish County (87%) traffic analysis. Regardless of which number is used, both numbers of trip divergence indicate a significant level of Pt. Wells trips using other streets than Richmond Beach Rd./185th. Trip distribution should be included for N.205th, 185th and 175th and be extended minimally to I-5. Only a limited traffic impact assessment has been provided in the DSEIS, only for Richmond Beach Rd./185 to Aurora. Traffic analysis and mitigation should be required on other streets and corridors significantly affected by Pt. Wells traffic, including carrying the analysis of traffic to I-5.

c. The level-of-service tables appear to only have small impacts based on the proposal, which intuitively does not seem correct. If the level-of-service is already E (based on 2025 Base-Shoreline and Aurora Corridor II Traffic Study), and traffic from 500 or 1000 units are added, shouldn't the level-of-service degrade to F or worse? Additional Pt. Wells units do not worsen LOS (such as going from 500 to 1500 units, an increase of 1000 units with no significant LOS degradation.)

If capital improvements are factored into the level-of-service calculations, they should be identified.

Level-of-service should not be the critical factor to determine the adequacy of Richmond Beach Rd. (205th to 196th). Though LOS A is shown, this is not a realistic assessment of impacts to the street and neighborhood. The current road may be a collector arterial, however its function and character are more representative of a local neighborhood, cul-de-sac street. Traffic from Pt. Wells development would significantly change the character of the neighborhood.

Though the traffic analysis shows the p.m. peak to be the most severe, the traffic during the a.m. peak should also be analyzed because of the traffic levels associated with Shorewood High School and Shoreline Community College traffic.

d. The traffic analysis ends at 185th and Aurora and does not consider traffic impacts on other streets where traffic diverts from the Richmond Beach Rd./185th corridor. Snohomish County's traffic study only shows 13% of Pt. Wells traffic ending up at the Aurora/185th intersection while the City's analysis shows about 60% reaching the same intersection. If either of these are accepted, a significant part of the site traffic diverts through adjacent neighborhoods and streets, creating further uncounted and unmitigated impacts. The traffic and mitigation analysis should minimally be carried out to I-5 (including 205th and 175th interchanges) and also include traffic impacts on other streets where site traffic would divert (such as 8th NW/Carlyle Hall Rd., Dayton Ave., Fremont Ave. and Meridian Ave.) This also would be more consistent with the Growth Management Act requiring disclosure of impacts on State facilities. There is no trip ending destination at 185th /Aurora where traffic stops or disappears. The full scope of significant traffic impacts should be identified, not just for the Richmond Beach/185th corridor.

e. Is the level-of-service analysis consistent with the traffic analysis from the Aurora Corridor II Study? From initial appearances, there does not seem to be sufficient remaining capacity at key intersections (205th, 185th, 175th and possibly 145th) to keep an acceptable level-of-service E or better. Most of these intersections are already at level-of-service E before the Pt. Wells

development. Also the level-of-service tables for increments of Pt. Wells traffic show a negligible decrease in traffic at various stages of increased development. Many intersections at level-of-service E before Pt. Wells barely show any degradation with various stages of Pt. Wells development.

f. A useful tool to show the traffic impact of the Pt. Wells site would be a traffic simulation model. This could show the current traffic condition and a comparison with various stages of development at the Pt. Wells site. Examples of simulation models are SYNCRO and CORSIM. The former is used by the City. This should be applied to the Richmond Beach Rd./185th corridor as well as other neighborhood streets that are adversely impacted.

g. Any consideration for transit and transportation demand management (TDM) considerations for the Pt. Wells site should be consistent with adopted transit plans, Sound Transit plans and accepted TDM actions. If service is not included in plans, mitigation should only be applied if full, sustained funding is provided by the development and there is guaranteed certainty of use. This should also include long term certainty and sustainability. A short term, failed transit or TDM action should not be credited with permanent trip reductions. Another key factor in this is the inability to force residents to use a particular mode of travel such as transit or rail-just having service does not mean ridership will occur. Accessibility, destinations, directness and frequency help determine whether service is used. Pt. Wells residents cannot be forced to ride transit, to bicycle or to walk. Having poor service or being in a plan does not mean trips will be reduced. Measures to create greater certainty and sustainability of use should be required to allow for any trip discounting.

h. As currently shown, the Pt. Wells site would only be served by a single point of access from Richmond Beach Rd. This would pose a severe access and safety hazard if the road is blocked. Most cities and counties in the region have limitations on the number of dwelling units that can reasonably be served by a single access point. Does the City have any such restrictions in the development code?

i. Richmond Beach Rd. has some significant road geometry concerns (grades and curves) and is susceptible to the dangers of icy/snow weather. What will be the impacts of adding Pt. Wells traffic to Richmond Beach Rd. during hazardous/inclement weather conditions? How will hazardous/inclement weather affect the ability of emergency vehicles (such as fire trucks) to serve the Pt. Wells site?

j. The City has embarked on a $100+ million project to improve the Aurora Corridor, representing a significant commitment of Federal, regional and local funding. The appropriateness of a Pt. Wells development should be carefully weighed against the working feasibility of the completed Aurora Corridor. During the Aurora Corridor II Study traffic analysis was conducted for key intersections including Aurora at 205th, 185th and 175th. For the selected 2030 "Build" Alternative, an am/pm peak hour analysis showed level-of-service E/E at 205th, E/E at 185th and E/D at 175th. This analysis did not include the level of development as proposed for the Pt. Wells sub area plan. If the Pt. Wells development was added to the Aurora Corridor traffic analysis, the Aurora Corridor levels-of-service would drop significantly below

level-of-service F. A $100+ million project investment should not be marginalized (rendered failing in service) before it is constructed.

k. Currently the intersection of Richmond Beach Rd. and 3rd NW is the worst "accidents intersection" in the City. The high volume of Pt. Wells traffic would severely worsen the dangerous problem. This should be a factor in determining the level of safe and acceptable growth for the site.

l. Many pedestrians and bicyclists use Richmond Beach Rd./185th and neighboring streets for walking and bicycling. Important attractions include the Library, Richmond Beach Park, local parks, Einstein Middle School, King's Schools, Shorewood High School, Shoreline Community College, St. Luke's School, Meridian Park School, and Parkwood School. Increasing volumes of traffic will create greater safety risks and accidents. This should be a consideration when determining future levels of acceptable traffic growth and mitigation.

m. A key factor in the Pt. Wells proposal is the designation of 8250 daily vehicle trips as "the" acceptable level of new vehicle trips. Is this consistent with the City's level-of-service standards (as prescribed by GMA in RCW 36.70A.070(6)(a))? What is the basis for the 8250 daily vehicle trips? Is one intersection with a failing level-of-service F acceptable and more than one not acceptable? Why isn't just having one failing intersection unacceptable?

There appears to be an inconsistency between the Shoreline Model Code language, Policy PW-9, referring to a limit of 8250 daily vehicle trips and Shoreline Municipal Code 20.92.100F setting a maximum traffic limit at 8500 vehicle trips. What is the basis for this limitation? Is this established as part of the City's transportation level-of-service standard as prescribed by the Growth Management Act?

References to 825 trips should be labeled 825 p.m. peak hour trips.

n. The Growth Management Act requires comprehensive plans (and consistent local plans) to identify the impacts of growth on State facilities. Impacts on State facilities as prescribed by RCW 36.70A.070(6)(a). Traffic impacts should be expanded to State highway facilities including SR-104, SR-99 Aurora and I-5. If Aurora intersections and I-5 interchanges fail due to the increased traffic of the proposal, this information needs to be disclosed to the State.

**3. Protection of existing neighborhoods**

What does the City of Shoreline stand for? A common answer is the quality of life and livability of neighborhoods and communities. That's what Seattle Magazine recognized in choosing Shoreline as the best community in 2006 and 2nd best out of 110 neighborhoods in 2009. Neighborhoods need to be improved, protected and sustained to foster desirability. Only applying a traffic level-of-service standard to Richmond Beach Rd. (205th to 196th) does not reflect a concern for traffic, safety and protection of the Richmond Beach neighborhood. Existing neighborhoods should be protected from unneeded and unmitigated growth.

**4. Conditions for development/level of development**

I strongly concur with the DSEIS recommendation to perform a more comprehensive and updated traffic/transportation study as part of the proposal, including the comments above.

If development goes ahead, it should be scaled to a level that least impacts existing neighborhoods and with full mitigation of adverse impacts.

Condition development based on stages with appropriate mitigation. For instance 500 units can be developed with a specific mitigation package. When completed and acceptable, the next stage can be developed and so on. This assures greater certainty of impacts/mitigation and phasing of growth.

Needed improvements should be concurrent with growth, at the time development occurs and not 6 years later (or never in the worst case.)

**5. Conclusions**

As a long time resident of Shoreline, I am happy with the City's services. However, one significant action can lead to a downward spiral. The City is at that step with the Pt. Wells development. How would you feel if a 3500 residential unit subdivision were proposed for development next to your home? This negatively changes the quality of neighborhoods. Are we sacrificing our neighborhoods for a bigger tax base? What is appropriate growth? It is not about more tax base-it is about quality of life. If Shoreline has a negative connotation (undesirable neighborhoods), who will want to live here? Remember Shoreline stands for its neighborhoods. Please make sure we walk the walk and not just talk the talk. One poor decision on a big development can destroy many neighborhoods (not just those directly affected by Pt. Wells, such as Richmond Beach, Richmond Highlands, and Hillwood, but also those throughout the City by creating intolerable traffic on arterial streets and I-5.)

Do we really need it? How much do we want? Protecting our existing neighborhoods should be the top priority, not out-of-scale, unmitigated growth.

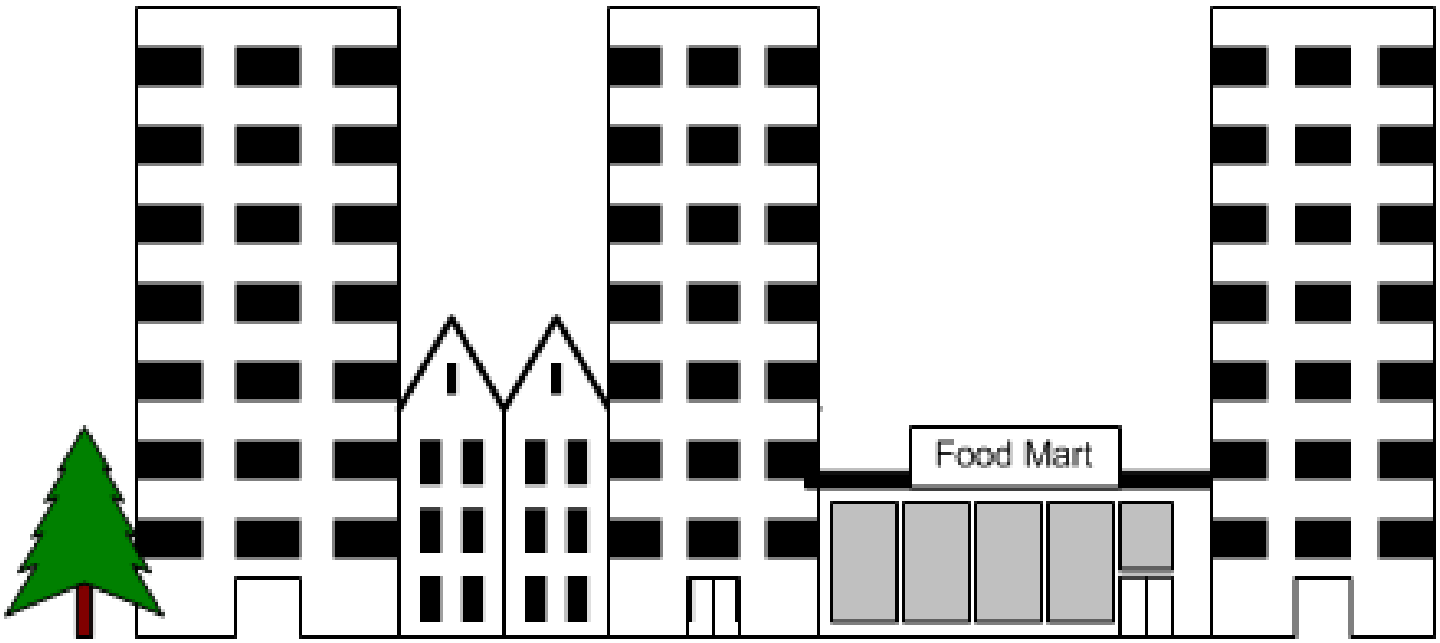
A few years earlier, Seattle Magazine selected Shoreline as the best Seattle-area neighborhood. And once again in 2009, honored Shoreline as the 2nd best out of 110 neighborhoods. Will we still be able to claim such a high status if we begin destroying our neighborhoods?

I hope these comments will help make the SDEIS a better document and aid your decisionmaking.

Thank you. Donald W. Ding

Donald W. Ding

Do this:




Not this: