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April 29, 2016

Town of Woodway
Attn: Town Clerk
29320 113th Place W.
Woodway, WA 98020
townhall@townofwoodway.com

RE: Proposed Comprehensive Plan Update

Dear Town Clerk:

On behalf of BSRE Point Wells, LP (“BSRE”), we hereby request, pursuant to Woodway Municipal Code (“WMC”) 15.04.020, that the Town revise its Comprehensive Plan, including the August, 2013 Municipal Urban Growth Area Subarea Plan found at Attachment A thereto, as more fully explained below.

The Town’s Municipal Urban Growth Area Subarea Plan contemplates the development of a large scale mixed use project at Point Wells. However, the Comprehensive Plan contains restrictions and Level of Service limitations which are in direct opposition to Plan’s stated goal regarding Point Wells and which violate the internal consistency requirement of the Growth Management Act.

As an example, T.Policy-6a provides as follows:

Surface transportation access (to Point Wells) shall continue to be provided to the waterfront area through the existing transportation network of Richmond Beach Drive NW. Future development of Point Wells should be designed to ensure that the maximum number of vehicle trips per day do not exceed the LOS stated in the transportation element.

The Town-wide standard contained in the transportation element is LOS A which is described as allowing no more than 273 vehicle trips per hour. We understand the desire to limit transportation impacts within the Town but the imposition of this standard, particularly on the small 250 foot section of Richmond Beach Drive NW located at the very edge of the Town’s boundaries, is in direct contravention of the stated desire to locate a mixed use Urban Village at the site.

Therefore, in order to help achieve the Plan's stated goal and to provide for GMA-mandated internal and external consistency, we propose the following Comprehensive and Subarea Plan revisions:

1. Change the current Level of Service ("LOS") designation for Collector Streets from Level A to Level B.

2. Revise TP-11 to read as follows:

To maintain the Town's adopted Level of Service standard B, as described in the Highway Capacity Manual. This applies to all movements at all intersections and driveways onto Town streets except for that portion of Richmond Beach Drive NW within the Town's boundaries where Level of Service standard C shall apply.

The Town's Comprehensive Plan contemplates adjustments of the kind proposed herein:

Although additional residential development with the Town limits will not adversely impact the identified Levels of Service at Town intersections, development with the Town's MUGA at Point Wells could have significant impacts on Town streets segments and intersections. New developments proposed within the Town and its MUGA will be evaluated to assess additional population growth and related impacts to the Town's transportation network.

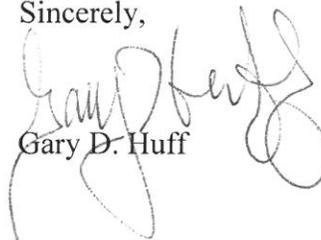
In addition to GMA-mandated internal and external consistency requirements, the requested changes are consistent with the Growth Management Act for the following reasons. These revisions would:

- a) Encourage development in areas designated as urban growth areas, where adequate public facilities and services can be provided in an efficient matter. RCW 36.70A.020(1).
- b) Encourage higher-density development, thus reducing the inappropriate conversion of undeveloped land into sprawling, low-density development by allowing land previously designated as urban to have higher density development. RCW 36.70A.020(2).
- c) Encourage economic development and promote economic opportunity. RCW 36.70A.020(3).
- d) Satisfy the mandatory requirement that each comprehensive plan include Level of Service designations for all locally-owned arterials and transit routes. RCW 36.70A.070(6)(a)(iii)(B).

The requested change is also consistent with Snohomish County's county-wide planning policies for the following reasons. Such changes would:

- e) Support the transportation elements of Snohomish County's Comprehensive Plan, develop consistent standards for the Collector Streets in the Town of Woodway and Snohomish County, and would more accurately tie in to the LOS for the Collector Streets which extend into unincorporated Snohomish County. *See* Snohomish County Countywide Planning Policy TR-5.
- f) Allow the Town of Woodway to determine transportation levels of service that consider different development intensities for urban centers, other urban areas and rural areas, as reflected in the County's long-range planning. TR-7.
- g) Ensure that the LOS would be used as a growth management tool to limit development in rural areas and offer an incentive for more intense development in existing urban areas. TR-8.
- h) Adhere to the County's designation and encouraged development and the potential annexation of the Southwest Urban Growth Area, which includes the unincorporated areas of the BSRE Point Wells property as well as the Upper Bluff property.

Sincerely,



Gary D. Huff

cc: BSRE Point Wells, LP
Steven D. Farkas, Counsel for BSRE Point Wells, LP
Douglas A. Luetjen, Counsel for BSRE Point Wells, LP
Steve Ohlenkamp, The Communication Group

GDH: jes