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Moab City Planning and Zoning
Nora Shepard, City Planner
217 E. Center Street
Moab UT 84532

Subject: Abbey Subdivision Traffic Study

Dear Nora,

As a former member of both the Moab planning commission and the city council (1992 - 2000), I am familiar with the challenges the commission faces when evaluating subdivision applications. Accuracy of submittal documents is often difficult to verify. I am currently a resident of Powerhouse Lane and am concerned about how emergency vehicle access to this residential area will be impacted by the Abbey subdivision. With regard to that, I believe the "Traffic Impact Analysis" provided by the developer deserves detailed scrutiny.

In particular I am concerned that the developer-provided analysis may not accurately reflect the creation of Accessory Dwelling Units (ADUs) on the qualifying lots in this subdivision. Unless the developer explicitly restricts the creation of ADUs in the Abbey subdivision, the traffic study must take these additional residential units into account. I do not believe Moab City codes currently restrict the percentage of lots in a subdivision on which an ADU can be permitted, except that lots under a certain size are disallowed from constructing an ADU. Consequently all qualifying lots in the Abbey subdivision must be assumed, for the purposes of an accurate traffic study, to be counted as two units, one for the principal house and one for the ADU.

Unless the developer's submittal reflects these additional unit numbers it should be deemed inadequate and cannot be used as a basis for approval by the council.

I inquired of the city engineer about the traffic analysis. Chuck replied that he did not know if it included ADUs or not. As a concerned citizen, I would like to review firsthand the entire application submitted to the city for this proposed development, especially the traffic analysis.

If indeed the traffic impact analysis does not include ADUs I believe it must not be ruled out that the developer, who is very experienced, has intentionally

omitted this aspect from his analysis in hopes of minimizing the actual impact of the development on Powerhouse Lane traffic.

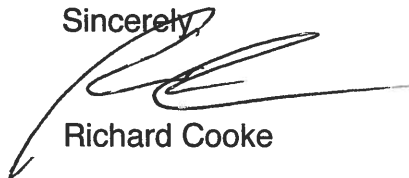
A development of this size, which in total number of units is, I believe, the largest subdivision application the city has received in many years (and the **only** one which has only **one** emergency evacuation route or normal traffic connector route) should require a traffic study by an independent entity such as Landmark Design rather than a developer-supplied analysis. This is doubly true if the initially submitted traffic analysis did not include accurate ADU totals.

Not only does Powerhouse Lane serve the Abbey subdivision, but also 20 additional lots (all or most of which qualify for ADUs themselves). Therefore the actual potential residential units served by the Lane may be close to 200 in total. This number of residential units is of concern in itself, but also the Lane is used by up to 800 additional vehicles per day to access Mill Creek Canyon, compounding the bottleneck that will assuredly hamper evacuation and emergency vehicle access. There are substantial acres of flammable cheat grass and Russian Olive thickets in the Powerhouse Lane area, similar to but much larger than the fuel which fed the Cinema Court fire that destroyed multiple homes just across Mill Creek Drive last year.

Accordingly, I believe the Abbey subdivision as currently platted creates an unacceptable risk to life and property for the residents of the Abbey subdivision, as well as the visitors to Mill Creek Canyon and the current residents of Powerhouse Lane. I encourage the Planning Commission to withhold approval and recommend to the council that a traffic study be mandated by an independent entity. If the developer's traffic analysis is deemed deficient due to ADUs or any other omission, it should be within the council's authority to mandate that the cost of the independent study be borne by the developer. I am in complete agreement with the preference expressed by the members of Mill Creek Village POA that the Abbey subdivision should access Mill Creek Drive independently of Powerhouse Lane.

In conclusion, could you please send me by email a link to the submittal documents for the Abbey subdivision? Thank you in advance for your attention to the above critical public safety issues and for sending the link.

Sincerely,

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

Richard Cooke

cc: Mayor Emily Niehaus, Moab City Council, Moab Planning Commission