

From: [Curt Fransen](#)
To: [planning](#)
Subject: SAPFY2026-0001 Comments on Draft 6
Date: Wednesday, September 30, 2026 4:55:39 PM
Attachments: [20260930-1417.pdf](#)

1. Attached are my proposed redlines and comments regarding Draft 6 in addition to and consistent with my testimony before City Council on September 28, 2026. These proposals and comments are handwritten (apologies for my penmanship) and only include the relevant pages of Draft 6.
2. I remain concerned about the interpretation of the email exchange between the City and ACHD concerning Adams Street traffic capacity which was included in material provided to City Council for its September 28, 2026 hearing. See page 138 of packet. In my view, the emails and other publicly available relevant ACHD documentation indicate that the total acceptable peak hour LOS D capacity for Adams is 425 and, based on counts taken in 2023, 85% of that capacity has been utilized. ACHD guidelines appear to provide that the acceptable standard threshold of LOS D for a two lane collector such as Adams Street is 9,500 Average Daily Traffic with a peak hour capacity of 425. The City interpretation is that 425+ remains to support additional development. I request that the City confirm which interpretation, or some other interpretation, is correct and inform City Council. The emails are quite confusing.
3. I remain concerned the the allowed heights and associated density and new land use designation of "Mid-Urban Mixed Use" (which, as defined, must be met by a Regulatory Master Plan) require development intensity that likely cannot be sustained by our local collector streets and is also not compatable with the surrounding neighborhoods. The "Mid-Urban" requirement and structure of the proposed SAP are very prescriptive; requiring high intensity uses and precluding lower intensity uses. Again, a Traffic Impact Study should determine the development intensity appropriate for the SAP.

Thank you for the opportunity to submit these proposed redlines and comments.

/s/ Curt Fransen

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