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Town of Woodway
WASHINGTON

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PLANNING & DEVELOPMENT SERVICES - ACCOUNTING

Darryl Eastin, Project Manager
Snohomish County Planning and Development Services
3000 Rockefeller Ave.; Second Floor East
M/S 604
Everett, Washington 98201-4046

Re: Woodway Comments on Scope of Point Wells EIS

Dear Mr. Eastin,

The Town of Woodway is in receipt of the Determination of Significance and Request for Comments on the Scope of the EIS for the Point Wells Mixed-Use Redevelopment Project that was issued on February 2, 2014. As you are well aware, the project site is located within the Town's Municipal Urban Growth Area, and the potential environmental impacts to the Town and commensurate measures to avoid or mitigate such impacts are of paramount importance to our community and residents. This letter serves to identify the elements of the environment that are likely to sustain adverse impacts resulting from the development of the Point Wells Mixed-Use Project. The Town recommends that Snohomish County carefully analyze how the project will impact the following elements of the environment and how such impacts can be avoided, reduced or effectively mitigated.

The Natural Environment

Earth: The site is situated adjacent to the Woodway Bluff that is designated in the Town's comprehensive plan as a high landslide hazard. As a result of documented previous slope instability, a detailed geotechnical report should be conducted for portions of the site affected by potential bluff slippage. The report should include an assessment of the geologic characteristics of the soils, sediments, and/or rocks of the project area and potentially affected adjacent properties, as well as a review of the site history regarding landslides, erosion and prior grading. The assessment should also include, but not be limited to, a description of the surface and subsurface geology, hydrology, soils and vegetation found in the project area and in all hazard areas addressed in the report. In addition, the report should include a detailed overview of the field investigations, published data and references; data and conclusions from past assessments of the site; and site-specific measurements, tests, investigations or studies that support the identification of geologically hazardous areas; and description of the vulnerability of the site to seismic and other geologic events. The report should contain a hazards analysis, including a detailed description of the project, its relationship to the geologic hazard(s), its potential impact upon the hazard

area, the subject property and affected adjacent properties, and how such impacts will be avoided or mitigated.

Soil remediation per the appropriate DOE process will be required to enable residential and public use of the site compared to the existing industrial use. Define the specific remediation process, phasing and timing, and how the process may impact surrounding properties and residents, together with the measures to avoid or mitigate identified impacts.

The waterfront site has the potential of being impacted by submarine earthquakes, especially due to the sites proximity to identified faults beneath Puget Sound. The DEIS should address how a potential tsunami would impact the project, including emergency warning systems and evacuation routes. In addition, the site is subject to sea level rise due to climate change. The University of Washington Climate Impacts Group and State DOE estimate that a medium scenario sea level rise in Puget Sound will range from between 7 and 15 inches by mid-century. Define how site design will respond to an increase in sea level rise and how such response (e.g., raising the existing grade with significant soil importation) will impact surrounding land uses and residents. Describe the amount of soil importation, phasing, timing and truck traffic, and how such actions that will impact Woodway residents and Woodway roads will be avoided or mitigated.

Air: Soil remediation, construction activities, heavy equipment use and transport activities all have the potential of impacting air quality on and around the site. Define the source, type and projected amounts of emissions, the potential health impacts, and how such impacts will be measured, monitored and mitigated throughout the life of the project. Describe what odors will be generated by construction/soil remediation processes, and how such odors will be eliminated.

Water: Several unnamed Class IV streams in Woodway drain to the Point Wells area and into Puget Sound. Define how the functions and values of these streams will be impacted by the project and what mitigation measures will ensure their long term function and values following construction and occupancy of the project. Alternative I and II will place a great demand on water consumption and use. Define project specific features that will minimize water use and improve water quality runoff into Puget Sound. Describe the public water demand and long term water availability from the utility that will serve the site.

Plants and Animals: The Washington Department of Fish and Wildlife Priority Habitat and Species list indicates the areas around the site as a priority habitat and species area. Define the plant and animal species associated with the terrestrial and aquatic habitat, and how construction activities and long term project use after occupancy will impact the habitat and animals, together with the specific measures that will be employed to avoid impacts to both plants and animals. There is documentation of active Bald Eagle nests on the Woodway bluff property. Although Bald Eagles are no longer listed as Threatened or Protected Species in Washington, they are still subject to conservation by the US Fish and Wildlife Service. As such, land owners must comply with the Bald and Golden Eagle Protection Act.

Identify the specific location of eagle nests in relation to the subject site and define any federal actions required to protect and preserve the associated habitat.

The Town's Shoreline Master Program identifies the near-shore areas adjacent to the site that support juvenile salmonids, including bull trout (federally listed), Chinook (federally listed), chum, coho, cutthroat, pink and sockeye. Surf smelt spawning areas are documented along the south shore of Point Wells. A sand lance spawning area also is mapped along the southern shoreline of Point Wells. Define how the project will impact the aquatic habitat of these species and any measures necessary to avoid or mitigate identified impacts.

Energy and Natural Resources: Describe the specific non-renewable and renewable energy resources proposed for the project, including any on-site cogeneration facilities. Define the impacts that any proposed on-site cogeneration facilities will have on adjacent properties, and how such impacts will be avoided or mitigated.

The Built Environment

Environmental Health: Clearly describe the petrochemicals, heavy metals and other toxic components/compounds that exist on the site and those that are programmed for removal via the State DOE clean-up process. Define the specific environmental health hazards associated with the components/compounds and how the health risks to human, terrestrial and aquatic organisms associated with the removal of such components will be identified and mitigated.

The removal of contaminated soils and potential for air borne toxic pollutants will impact surrounding uses and residents. Identify how monitoring will occur and how environmental health hazards will be controlled and mitigated.

Define the noise impacts to Woodway land uses associated with the phased site preparation, utility installation, building construction and transport alternatives. The application includes the possibility of a commuter rail transit station and proposes a sound barrier wall to protect the planned project-residences to the west of the BNSF tracks. This proposed sound barrier wall may have the opposite effect on Woodway residences because it has the potential to reflect sound waves upward to the east. Define measures to avoid or mitigate noise impacts on surrounding neighborhood land uses associated with site development including transportation options.

Land and Shoreline Use: The site is located within unincorporated Snohomish County and within Woodway's Municipal Urban Growth Area. As such, the site is subject to the *Snohomish County Countywide Planning Policies, Snohomish County General Policy Plan* and the goals and policies of the *Woodway Municipal Urban Growth Area Subarea Plan-2013*. Pursuant to the Countywide Planning Policies and the Puget Sound Regional Growth Strategy –*Vision 2040*, unincorporated areas within a county's designated urban growth area are intended to be annexed to the adjacent affiliated city/town. Given that the Snohomish Countywide Planning Policies designate Woodway as the affiliated city/town (i.e., Woodway Municipal Urban Growth Area), Point Wells is intended to be annexed in the future to

Woodway. The City of Shoreline is in King County and also has prepared a sub-area plan for Point Wells. Similar to the Woodway plan policies, Shoreline proposes to annex Point Wells. Given the desire of both jurisdictions to annex Point Wells, it is prudent for the jurisdictions to define the specific geographic area and service entities that are in their best interest and reach an interlocal agreement on the timing/conditions of future annexations.

Based on the above, the DEIS should describe the level of consistency of the three alternatives with the Countywide Planning Policies, the County General Plan, Woodway Municipal Urban Growth Area Subarea Plan and the City of Shoreline Subarea Plan.

Point Wells is currently subject to the Snohomish County Shoreline Master Program. If the waterfront area is annexed to the Town of Woodway in the future, it will be subject to the policies and regulations of the *Woodway Shoreline Master Program-2013* for the Point Wells Urban designation. The DEIS should evaluate how the alternatives will conform to policies and regulations of both the Snohomish County and Woodway Shoreline Master Programs for Point Wells.

The proposed building layout and heights (175'-180') associated with Alternative I and the potential building heights of Alternative II (125') will be visible from many Woodway residences and surrounding neighborhoods. Current views of Puget Sound and distant vistas will be obstructed. Existing view corridors should be studied to define the specific view blockage impacts and mitigation of such impacts should include adjustments to the building layouts and heights.

The EIS needs to identify the economic impacts to the property values of surrounding neighborhoods, especially considering the planned phased, long-term construction period preceding full build-out of the development.

The *Woodway Municipal Urban Growth Area Subarea Plan -2013* includes goals and policies that focus on the compatibility of a future mixed-use urban village at Point Wells with existing surrounding residences and neighborhoods. Compatibility is defined in terms of building and site aesthetics that complement the existing neighborhood character rather than distract from it. Describe the aesthetic impacts of the project alternatives on surrounding neighborhoods. Define how the proposed site design, building materials, glazing, elements to reduce light and glare, building scale and landscaping improvements will complement rather than detract from neighborhood character and how any such detraction will be eliminated or mitigated.

The population increase associated with the alternatives will be using Woodway passive parks and public open space areas. Describe the impact on the Town's recreation resources and how such impacts will be avoided or mitigated through the provision of on-site active and passive recreation facilities.

Prior to the existing petroleum related uses, Point Wells was used by Native Americans. The EIS should study if there are any archeological and historic resources on the subject site, and ensure that the Washington Department of Archeological and Historic Preservation is notified prior to any site disturbance.

Transportation including Non-Motorized Modes: The Transportation Corridor Study that is being conducted by BSRE for the City of Shoreline (in accordance with the memorandum of understanding signed April 13, 2013 by the City and Developer) only addresses road segments and intersections in Shoreline south of the King County line. Alternatives I and II however, will also have significant impacts on the Town of Woodway's motorized and non-motorized transportation network.

Define the anticipated impacts to Woodway's transportation network, and how any such impacts will be avoided or mitigated. In evaluating impacts to Woodway's transportation network, of particular importance is the need to address the structural integrity of the bridge on Woodway Park Road and the overall pavement structure and capacity of the Town's road network, both in terms of mitigating construction impacts and funding predictability to assure adequate maintenance over time.

Traffic volumes anticipated to be generated by the project on Richmond Beach Drive in Woodway exceed reasonable thresholds for any existing roadway classification in Woodway's Comprehensive Plan. The Town's Comprehensive Plan limits the maximum number of trips on the portion of Richmond Beach Drive located within Woodway to 8,250. It is highly likely that access to Woodway residences located off of Richmond Beach Drive will be compromised if traffic volumes exceed this limitation. Define the impacts to the Town's adopted LOS, including impacts to Woodway residences accessing Richmond Beach Drive, and how such impacts will be avoided or mitigated.

Traffic calming as a mitigation measure may be needed throughout the Town to address the impact of the increase in traffic volumes and speeds, which would alter the character of the Town's roads, contrary to the goals and policies of the Town's Comprehensive Plan. Describe how the specific mitigation measures will be consistent with the Town's adopted transportation and land use goals and policies set out in the Comprehensive Plan, especially those related to maintaining the identified "Town character".

With regard to the bicycle and pedestrian environment, define the consistency of the project with Woodway's Comprehensive Plan. Multimodal levels of service may be one tool to measure the impact to the bicycle and pedestrian environment. Use of such a tool should be used with caution given that current methodologies were developed in Florida and fail to consider grades.

Emergency access is another issue that needs to be addressed thoroughly. An accident or natural disaster that damages or destroys the bridge or Richmond Beach Road could strand several thousand people and preclude emergency vehicle access. Any proposed emergency access route needs to be consistent with Woodway's Comprehensive Plan policies.

Onsite parking also needs to be carefully considered, due to the lack of off-site parking. The trip generation calculated in previous analyses was based on a presumption of high transit usage and internal capture. These also need to be carefully considered, especially how transit service is to be maintained if transit agencies are unable or unwilling to sustain service levels adequate to achieve assumed mode splits.

Public Services and Utilities: Future urban services, including fire, police, sewer, water, stormwater, energy and other municipal services, are likely to be provided from a multitude of service purveyors. Given the complexities associated with multiple service purveyors, interlocal service agreements and any shared services need to be addressed upfront and included in any development agreements. Fire service is of particular importance given that the site is not currently within the boundaries of a fire district. Define how the impacts to the existing service capacities, delivery infrastructure and network of service purveyors and demands for increased services can be mitigated. In addition, describe the existing utility and service fee structure associated with current purveyors and if fee increases will be paid by new project residents or imposed district/area wide on current residents.

It is important that the EIS consider the long term costs associated with maintaining the capital improvements to Woodway's infrastructure resulting from construction of identified mitigation measures. Further, and as mentioned above, Point Wells is designated in both the Woodway and Shoreline comprehensive plans as a future annexation area. Lastly, the EIS should address various economic measures to mitigate future multi-jurisdictional issues and long term service impacts to public services, utilities and infrastructure.

Thank you for the opportunity to comment on the scope of the DEIS and the Town of Woodway looks forward to reviewing a comprehensive document that fully discloses and analyzes all environmental impacts described above and attendant measures to avoid, reduce or mitigate identified impacts.

Sincerely,

Carla Nichols, Mayor
Town of Woodway

CC: Town Council
Eric Faison, Town Administrator
Wayne Tanaka, Town Attorney
Bill Trimm, SEPA Official