



**Eastin, Darryl**

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**From:** JANE GLASCOCK <jane\_glascock@msn.com>  
**Sent:** Friday, February 28, 2014 5:28 PM  
**To:** Eastin, Darryl  
**Subject:** Comments on the proposed Point Wells development

Darryl Eastin  
Snohomish Co. Planning and Development Services  
3000 Rockefeller Ave. M/S 604  
Everett, WA 98201

Dear Mr. Eastin:

I am a 24 year resident of Innis Arden writing to express concerns with the proposed Point Wells project. I won't revisit the eloquently expressed issues brought up by Innis Arden, Richmond Beach, Woodway, and other residents –construction traffic, resident-generated traffic, air pollution, noise, a project out-of-step with the character of Richmond Beach, inadequate responses to emergency services, school issues, and, of course, the impact of traffic on Innis Arden. I agree with them all.

Instead, I'd like to focus on a couple of issues that have to do specifically with transportation and traffic.

First, I am concerned that actual traffic along Richmond Beach Road, with cut through traffic affecting Innis Arden, will be *much* heavier than the developer's Traffic Analysis Study suggests.

The thinking behind the traffic impact analysis seems flawed to me, and that analysis is central to arguments in favor of the development. According to the Evans and Associates report, "Point Wells Expanded Traffic Impact Analysis," Point Wells will be an "...urban center, providing many of the needed amenities and services to allow residents to remain on site instead of travelling off site for their desired goods and services, p 8." And so, in the formal traffic analysis, a considerable number of trips are assumed not to be made on Richmond Beach Road and elsewhere because there are alternative shopping and other venues at Point Wells.

This would be fine if the isolated Point Wells were a retirement or leisure community. However, as with most quasi-residential neighborhoods, most people will live there and work elsewhere, creating opportunities for shopping and other activities along the way.

In fact, the transportation literature on trip chaining actually shows that people do not behave the way the traffic analysis suggests. Rather they will mostly use cars for work and also for chained trips to groceries, cleaners, etc. on the way to/from work. (Of course this also has implications for the viability of grocery and other retail planned for Point Wells.) Yet the analysis explicitly depends on such "internalization reduction" in developing traffic estimates over time.

The developer may argue that the impact analysis was conducted based on a model using actual origin-destination and cordon data from three existing mixed-use developments in Texas and Georgia, with some additional data from Florida -- Mockingbird Station and Legacy Town Center in Texas, and Atlantic Station in Georgia.

And so, the argument goes, traffic analysis estimates would tend to be accurate.

These mixed-use developments are vastly different from that proposed at Point Wells. Rather than de novo projects, they are in-fills into existing urban settings, adjacent to highways and toll-ways, rapid transit, and with multiple street access and egress.

Mockingbird Station has over 145,000 sq. ft. of office space and five hotels. Legacy Town Center is located in an existing massive business park of over 2,600 acres.

I surely do not have the expertise to estimate any differential impacts of trip generation rates derived from these venues as applied to land use within a future, much smaller, cull-de-sac Point Wells development. But it would seem that internal trip capture rates during the day within huge, urban office parks with restaurants, hotels, cinemas and other amenities would be much higher than for the proposed development. Instead of being a large-scale attractor of workers as well as a planned residential community, the proposed development here will include many, many who live at Point Wells but work elsewhere.

And so I am very concerned that Richmond Beach Road, our Innis Arden streets, and other corridors near by will be affected by traffic congestion to a **much greater extent** than estimated by the developer's consultant.

The Impact Analysis Study also is troublingly rosy (the authors, of course, are paid by Point Wells). For example, it states:

"...it is *known* (italics mine) that LINK Light Rail will come **near** the Point Wells project....p 20." In this case "near" means I5 and N185th, a distance of approximately 3.5 miles.

Or:

"Easy access from the Point Wells development to the LINK light rail system, either along SR99 or I-5 *will be provided* (italics mine) by the King County Metro bus system p 20."

This must be news to King County Metro at least in that the King County Metro Long-Range Plan does not reference any such any new transit service. Current Metro service in the area does not extend to I-5.

Or:

"...a Sound Transit Sounder Station would be constructed on site, allowing residents to travel along the existing rail route north to Edmonds, Mukilteo, and Everett and/or south to the King Street Station in Seattle, p20."

While the developer's TDM report states: "The developer will *collaborate with* (italics mine) Sound Transit and BNSF for construction of light rail (*sic*) platforms to serve the development and adjacent community," the Sound Transit Regional Long-Range Plan has no mention of plans to construct a Sounder Station in Richmond Beach, nor do any documents or mentions of a RB Station appear on the ST Website. In the past, Sound Transit appears to have looked into the possibility of a Sounder stop at Richmond Beach, and also appears to have rejected it.

Also, while there may have been mention of funds to pay for transit service and the development of the infrastructure for a new Sounder station at Richmond Beach within the numerous documents and

reports that appear on the Snohomish County website, I couldn't find it. It is hard to believe ST would invest in infrastructure, scheduling, and operations for a station only five minutes from Edmonds out of a spirit of regional generosity. The same applies to the ever-constant financing hamster-wheel affecting Metro Transit.

This is not to suggest new service might not evolve over time; however, the study seems to imply fairly done deals with ST and King County Metro and that does not appear to be the case.

Because of these concerns I have two suggestions:

- While I personally am against Point Wells, and believe local governments have totally abandoned rational thinking and normal reason, now at the very least, the developer and Snohomish County should ensure additional access to and egress from the development via. 20<sup>th</sup> NW, and/or 24<sup>th</sup> NW, with new through-access to 244<sup>th</sup> st SW, and/or other possible north-direction routes.
- If not already provided, the developer should explicitly commit to funding transit, rail service and infrastructure referenced in development planning, in the event that Sound Transit and/or King County Metro do not provide the proposed service the developer believes will happen. Alternatively, the developer should commit in writing to providing other means of transporting people, not just in Phase I, but over the long run to transit service outside Point Wells.

This explicit commitment seems key in that code requirements for any proposed urban center (SCC 30.34A.085) require the urban center (a) be within a half mile of light rail or commuter (heavy) rail lines or regional express bus routes, or (b) provide new stops/stations within a half mile of the center or (c) provide some other way of transporting people to mass transit.

If regional transit agencies do not plan to pay for such infrastructure and service, it must be clear that the developer will do so before the spades break ground.

Thank you for the opportunity to contribute to the discussion of concerns about the Point Wells proposed development.

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