Point Wells Development
Determination of Significance Scoping Comments
File Number: 11-101457-LU
Project Manager: Darryl Eastin

To Whom It May Concern:

In regards to the SEPA Determination of Significance issued February 2, 2014 for the Point Wells Development (File Number: 11-101457-LU): Please consider the following issues within the scope of the Environmental Impact Statement.

Impacts pertaining to Shoreline WA and the Richmond Beach neighborhood, Woodway, WA, Edmonds WA, Snohomish County and King County:

1.) The size and scale of the proposed project (3,000 dwelling units and 11,578 vehicles a day, a 25 year build-out phase) is completely out of proportion with the surrounding communities. Study scaling back the size and length of the project to a more reasonable level that would be compatible with the existing density levels of the surrounding neighborhoods. Consider an acceptable level of development at Point Wells that would not disrupt the lives of the residents in the adjacent communities over such a protracted time period during and after construction.

2.) Compare all of the impacts of the Point Wells project with another comparable project within Snohomish County, the Point Edwards development on the former Unocal site in Edmonds. Both properties are former oil processing facilities located nearby on Puget Sound that are being converted into residential use. Analyze the scale and density of each project. Then compare and contrast the two sites with each other, including the number of dwelling units. Study the environmental clean-up involved for each site. Analyze and compare the traffic impacts generated by each development. Include in the traffic analysis the convenient access from Point Edwards onto a 5 lane highway, (Edmonds Way) and compare that with the proposed access onto residential streets on Richmond Beach Drive and Richmond Beach Road in Shoreline.

3.) Analyze routing traffic from the Point Wells development primarily through Woodway, using modern engineering technology to design and construct a new road. Study existing road easements, and the feasibility of acquiring additional right of way in order to accomplish constructing a new road through Woodway. Consider prioritizing developing a route that would capture the majority of the traffic impacts within Snohomish County, where the development is located and taxed.

4.) Study and analyze all of the traffic impacts to the jurisdictions surrounding the Point Wells development. Include all of the traffic impacts upon the residents of the Richmond Beach

I-71 Hill, Sherry and Jeffrey -- April 2, 2014
PFN: 11-101457-LU, et. al
neighborhood in Shoreline, and upon the entire city's traffic system during all phases of the project including the environmental clean-up, construction, and final build out.

5.) Besides Richmond Beach Drive, NW 196th, and Richmond Beach Road, include in the study all north-south arterials along 205th that lead into Snohomish County and the businesses and services located in Edmonds (20th NW, 15th NW, and 8th NW). Consider all possible neighborhood cut through routes, and the safety implications of diverted traffic. Focus particular attention on the transition points from Shoreline into Woodway along 205th at 20th NW, 15th NW, and 8th NW that are already awkward and dangerous. Ensure that the road standards in Woodway and Edmonds will be compatible with Shoreline.

6.) Study and analyze all of the traffic impacts to the town of Woodway. Include a detailed engineering and seismic assessment of the vintage two lane bridge spanning the ravine along Woodway Park Road at Deer Drive, including gross weight limits. Perform a cost analysis to replace the bridge and bring it up to standard. Include in any future traffic study all possible routes through Woodway between the Point Wells development and the businesses and services located in downtown Edmonds. Closely examine the safety of the section of one lane road with a large tree in the center of it, located on Wachussett Road.

7.) Determine the anticipated levels of construction traffic during the environmental clean up phase, and throughout construction of the project. Consider the need for increased maintenance to the roads leading to the project during all phases of construction due to wear and tear from transporting heavy equipment and trucks, workers and machinery to the site.

8.) Study and analyze the impacts of traffic and lane configuration upon emergency response time throughout all affected neighborhoods in both Shoreline and Woodway. Include contingency plans for a major disaster at Point Wells and the surrounding neighborhood.

9.) Include current and potential school bus stops for both Shoreline School District and Edmonds School District in any traffic safety studies and plans. Include school start and dismissal times in the traffic models, along with the number of school children out on the affected streets.

10.) Include plans for extreme winter weather events on traffic and access to the Point Wells site. During past sudden snowstorms, Richmond Beach Road has become impassible and large numbers of motorists have been left stranded at the top of the hill at 8th NW, with no other safe access route home into Richmond Beach. Many vehicles have been abandoned along Richmond Beach Road below 8th NW blocking access. Identify a location were hundreds of stranded motorist's vehicles could be parked until the snow melts. Determine which jurisdiction would bare financial responsibility for snow removal along Richmond Beach Road in order to accommodate several thousand additional residents anxious to get back to their homes.

11.) Consider the impact of locating a light rail Sounder Transit station on or near Point Wells. Evaluate the impact of attracting additional commuter traffic from outside the neighborhood down Richmond Beach Road and Richmond Beach Drive to the site.

12.) Study the potential for landslides along the hillside adjacent to the Point Wells development. Include in the analysis all relevant geology and hydrology reports necessary to perform a professional evaluation. Analyze all of the recent landslide events that have occurred on Puget Sound to the north and south of site along the Burlington Northern Railroad tracks. Include in the landslide study all relevant slide events along the corridor within the past 100 years. Consider the long term risk and
potential adverse impacts of a future landslide in the Point Wells zone upon the development and the surrounding areas.

13.) Include economic projections on the effect that the development will have upon the property values of the adjoining homes and neighborhoods in both Shoreline and Woodway at all phases of the development, including environmental clean-up, construction, and the build out and sales phases.

14.) Determine the anticipated noise levels generated by the construction phase including heavy truck traffic along the roads leading to the development, as well as by men, machinery and equipment on the site.

15.) Conduct an economic study of the viability of establishing a retail and commercial district within the development. Consider eliminating the perceived need by the developer for a retail "capture" area within the site by a significant reduction in the number of dwelling units in the proposal.

16.) Consider the potential impacts if the developer were to go into default at any point during the construction phase and sales of the development, leaving a half completed project. We have witnessed in recent history just such a scenario played out locally and nationally. What guarantee does Snohomish County have that the developer will remain stable and solvent over the entire course of a 25 year build out and sales program?

Respectfully Submitted,

April 2, 2014

Sherry Edington Hill
Jeffrey D. Hill

19523 22nd PL NW
Shoreline, WA 98177

206 546 9038

*(As per our phone conversation earlier today with Darryl Eastin, we appreciate your accommodating a slight delay in our submission due to technical difficulties.)*