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Dear Mr. Eastin:

On behalf of our members and Board of Directors, Save Richmond Beach submits this letter and enclosure as our comments on the scope of Environmental Impact Statement (EIS) for the proposed Urban Center development at Point Wells.

As noted by the Growth Management Hearings Board, the Point Wells location has serious limitations and potential for adverse impacts due to its location on Puget Sound, close proximity to residences, slide-prone cliffs on the east side of the parcel, and very limited vehicle access. We have also identified many other elements in the attached comments that we believe need careful study and response in the EIS.

The Point Wells project has potential to make drastic changes to the Richmond Beach neighborhood and these potential changes deserve a detailed review to ensure the final approved development is not necessarily the one desired by the developer, but is the one that minimizes environmental impacts and best fits within current neighborhoods and many constraints of the Point Wells location.

In addition to the specific comments set forth the attached document, Save Richmond Beach supports and hereby incorporates the comments previously submitted by the City of Shoreline and Town of Woodway. Thank you for your consideration of these comments.

Thank you,  
/s/  
Tom Mailhot  
President, Save Richmond Beach

Cc: Board of Directors, Save Richmond Beach  
City of Shoreline  
Town of Woodway  
Richmond Beach Community Association

Enc: Point Wells Mixed-Use Development EIS Scoping Comments



## **Point Wells Mixed-Use Development Project EIS Scoping Comments**

### **Land Use/Relationship to Plans and Policies**

Snohomish County Code section 30.34A.080(9) requires that an Urban Center development include transportation demand management measures such that 15% of a project's peak hour vehicle trips are removed from the road system. Currently, there are no Community Transit routes and two King County Metro routes that serve Richmond Beach. One of the two King County Metro routes in Richmond Beach (route 304) is scheduled to be eliminated in 2014. The Point Wells developer has said it will provide shuttle service to existing transit hubs (Shoreline Park and Ride and Aurora Village Transit Center) but the Transit Compatibility Plan submitted with its application indicates the shuttle service could be as infrequent as every two hours during peak travel times.

- The EIS should examine how the developer is going to reach the goal of 15% reduction if one of the two peak hour routes is eliminated and there is no frequent shuttle service.
- In evaluating the impact of this Urban Center on the local road network, the EIS should address and assume the absence of mass transit options, including specifically Metro's proposed elimination of the 304 route.

Snohomish County Department of Public Works Rule 4227 sets transit compatibility criteria for new developments. This rule says urban residential developments must have a transit load factor (ratio of riders to available seats) of no more than 1.2. King County Metro is the only transit agency currently serving Richmond Beach. With the elimination of Metro route 304 in 2014:

- The EIS should examine how the developer is going to meet this requirement if King County Metro eliminates one of the two routes serving Richmond Beach.

### **Transportation Impacts**

Snohomish County's Final EIS for the addition of the Point Wells Urban Center to its Land Use Comp Plan indicates that traffic trip generation estimates were calculated using the standard ITE Trip Generation Matrix. The developer's Extended Traffic Impact Analysis used the same matrix to generate trip estimates. We anticipate that the project EIS will use this matrix as well. The ITE matrix assumes a typical level of transit and non-motorized travel (10% of peak hour trips). For the commercial or retail portion of the development, it also assumes some percentage of the trips into the site are made by vehicles that would pass the site even if the development was not completed (pass-by trips). The trip generation figures calculated for the Point Wells development using the ITE matrix were also adjusted downward by some amount because the ITE matrix did not include figures for mixed use developments.

- The EIS should examine whether the lack of access to high capacity transit at Point Wells will result in less than the typical number of transit trips (i.e., less than 10% of peak hour). If that is determined to be the case, then the ITE trip generation figures should be adjusted accordingly.



- The EIS should examine whether the fact that Point Wells is at the bottom of a very long hill, necessitating a long steep walk or ride to the nearest employment center or transit hub, will result in non-motorized (walking and biking) trips totaling less than the standard 10%. If that is determined to be the case, then the ITE trip generation figures should be adjusted accordingly.
- Adjusting the ITE trip generation numbers downward because Point Wells is a mixed use development also lowers the peak hour trip estimates. While the office and retail businesses located at Point Wells will capture some of the trips, it does not seem like many of those captured trips will occur during peak travel hours. The EIS should examine what portion of the internal trips would occur during peak travel hours. If the number of internal trips for each peak hour is not proportional to the total number of internal trips, then the peak hour trip estimates should be adjusted upward.
- Because Point Wells is at the end of a dead end road, the EIS should examine how *any* of the trips into the site could be pass-by trips. If there are no pass-by trips then the ITE trip generation figures should be adjusted accordingly.

Many of the trips generated by the Point Wells development will travel to various entrances to I-5 causing increased volume at these entrances. The entrances to I-5 serve areas of north King County and south Snohomish County, both west of I-5 and east of I-5. The traffic studies completed in support of the Final EIS for the Point Wells Urban Center Comp Plan designation and the developer's Extended Traffic Impact Analysis both examined the development's impact on traffic west of I-5 only.

- The EIS should examine the impact that increased volumes at the entrances to I-5 has to the traffic flow on streets east of I-5 in north King County and south Snohomish County.

Seattle's most recent Transit Master Plan recommends bus bulbs instead of pull-outs to decrease bus waiting time at bus stops. While decreasing bus wait time, the use of bus bulbs causes traffic delays as traffic behind the bus cannot get by. Shoreline has not recommended either bus bulbs or pull-outs.

- The EIS should examine the impact on transit speed and traffic flow of bus bulbs verses bus pull-outs on Richmond Beach Drive, Richmond Beach Road and any other road where traffic improvements are required due to increased traffic generated by the development.

The developer's application materials describe plans for only 1.0 parking spaces per unit, based on an average unit size of 850 sq. ft.

- The EIS should study the potential for owners and customers at Point Wells to park their cars in the surrounding Woodway and Richmond Beach residential neighborhoods due to limited parking within the Urban Center.



- The EIS should evaluate and address the safety and environmental impacts resulting from the likely increase in on-street parking within adjacent residential neighborhoods.

### **Geology and Soils**

The Puget Sound area is susceptible to earthquakes. The Snohomish County Hazard Identification and Vulnerability Analysis study shows Point Wells is in the highest risk soil liquefaction zone. A major earthquake in the Puget Sound area could result in soil liquefaction at Point Wells causing potential damage to the buildings and the overpass crossing the rail tracks.

- The EIS should examine the effect of soil liquefaction on the proposed Urban Center in the event of a major earthquake. The EIS should study the effect of liquefaction on both the buildings and the overpass crossing the rail tracks.

### **Water Quality and Pollution**

The development will include a large amount of impervious surfaces which should drain rain water into a stormwater management system. If the system is not properly designed the stormwater runoff could drain into Puget Sound introducing pollution into the water. In addition, the significant increase in automobile traffic to and from Point Wells will cause an increase in stormwater pollution on roads leading to and from the site.

- The EIS should examine the potential for stormwater runoff pollution into Puget Sound.
- The EIS should consider the increase in pollution load (for example, motor oil and metals from brake dust) to stormwater caused by the significant increase in vehicle traffic on roads leading to and from the site. The EIS should evaluate whether the current stormwater collection and treatment systems, if any, on neighboring roads are adequate to address the increase in traffic-related stormwater pollution.

### **Emergency Access**

Point Wells is accessed by a single road. All areas of the proposed Point Wells development other than the upper village are to be accessed via an overpass crossing the main Burlington Northern Santa Fe railroad line between Seattle and Chicago.

- The EIS should examine whether there is adequate road capacity for emergency evacuation of Point Wells following an earthquake, tsunami, fire or other disaster that requires evacuation of Point Wells.
- The EIS should examine whether the overpass crossing the rail line could be damaged by an earthquake or other disaster so it is not usable by those needing to evacuate, or by emergency workers attempting to access the site.

The Burlington Northern Santa Fe rail line carries hazardous material including oil being shipped to refineries. In the event of an accident near Point Wells involving a train carrying hazardous material that is spilled, the residents may need to be evacuated due to fire, the potential for explosions, or poisonous chemicals in the air.



- The EIS should examine whether the development and construction of Point Wells creates an increase risk of collision with passing trains, and whether there is adequate road capacity for an emergency evacuation of Point Wells in the event of a nearby train wreck involving hazardous material.
- The EIS should examine whether there is an adequate emergency evacuation route should the overpass crossing the rail line become unusable due to a nearby train wreck that spilled hazardous material.

The Point Wells site is accessed via a single two lane road and the development is projected to generate between 10,000 and 20,000 vehicle trips per day. With that heavy traffic and a single entry point, fire equipment travelling to the site could be delayed should an emergency occur during peak traffic times or if the single road is blocked by an accident, slide, or other situation. The International Fire Code (section 503.1.2) allows the governing fire code official to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition or terrain, climatic conditions, or other factors that could limit access.

Additionally, development codes in Snohomish County and Woodway require a large development such as Point Wells to connect to at least two points of access.

- The EIS should examine whether there is a need for an additional fire apparatus access road or other secondary access, and should identify and evaluate options for placement of a secondary access point.

### **Cultural Resources**

Local residents have reported finding Native American artifacts on the beaches at and around Point Wells, and tribal historians have confirmed that Point Wells was a known fishing site for at least one local tribe.

- The EIS should include a comprehensive study examining whether there are archeological, cultural or historic sites on Point Wells that must be preserved. The study should specifically address the impacts of the proposed Urban Center on Native American cultural resources.

### **Environmental and Health Impacts**

Point Wells has been an industrial site for over 100 years, and the soil there contains hazardous materials as a result of leaks and spills of petroleum products or other chemicals. The hazardous materials could be contained in the soil from ground level to several hundred feet underground. Parts of some of the structures will be underground and could be exposed to seepage of hazardous materials held further underground. Grading and construction at Point Wells will involve the moving or disturbing of large amounts of soil. This could result in large amounts of disturbance and exposure to hazardous materials at the construction site.

- The EIS should examine the need for cleanup of hazardous materials at the site and the potential for exposure pathways, both to the surrounding community and owner/customers within the Point Wells Urban Center. The EIS should specifically



address the potential for exposure as hazardous materials are transported through the residential neighborhoods surrounding the site.

- The EIS should examine whether construction dust could contain any hazardous material that would be harmful to those breathing the dust.
- In general, the EIS must address the need for cleanup at the site and the impacts of the cleanup process. If Snohomish County chooses to evaluate the cleanup separately and assume for purposes of the EIS that the cleanup has been successfully completed, then any future development of the site must be conditioned upon the developer first obtaining a “no further action” letter or equivalent determination that all regulatory requirements have been met.

### **Air Quality, Climate Change and Noise Impacts**

The developer has stated that the construction phase at Point Wells will last for several years. Construction at Point Wells will involve heavy machinery, pile-driving, and the excavation and removal of large amounts of soil. The excavated soil could be removed from the site by truck or by barge. In general, construction at Point Wells will generate considerable noise, traffic, and dust from heavy machinery and other activities.

- The EIS should examine the noise, dust, traffic, environmental and other impacts of such a long-term construction project on the surrounding community.
- The EIS should examine the two methods of soil removal to determine the impact each method will have on air quality, noise, and neighborhood traffic.
- The EIS should evaluate and address ways to minimize and mitigate the noise, dust, traffic and other impacts generated by construction activities.

The additional traffic generated by the completed development will cause increased noise levels along the roads leading to the site.

- The EIS should examine ways to minimize and mitigate the noise generated by the increased traffic to and from the site.

The construction of the Point Wells buildings and facilities, the operation of the buildings and facilities once completed, and the additional traffic generated by the development could cause increased air pollution, including greenhouse gases emissions which contribute to global climate change.

- The EIS should examine the impact of the development on air pollution, including greenhouse gas emissions and climate change.
- The EIS should examine methods to minimize GHG emissions during the construction phase.



- The EIS should examine methods to minimize GHG emission from the on-site power generation facility at Point Wells.
- The EIS should examine methods to minimize air pollution from vehicular traffic generated by the development.

The developer plans a district heating system burning biomass. Burning biomass has the potential to release carbon dioxide gas and particulate matter. The particulate matter could cause breathing difficulty for neighborhood residents with asthma or other breathing problems. Any particulate matter released by the heating system could be carried some distance by the wind.

- The EIS should examine the impact of green house gas emissions from the district heating system on climate change.
- The EIS should examine the impact of particulate matter released by the district heating system on neighborhood residents in Richmond Beach, Woodway, and Edmonds.

### **Cumulative Impacts of “Mushroom” Development**

With the large number of new housing units at Point Wells, there will almost certainly be pressure in the surrounding area for additional businesses to serve the new residents. The new businesses could also increase the desirability of even more residential development in the area around Point Wells. Each additional new business or residential structure may be small enough to avoid an extensive environmental impact study, but the cumulative impact of this additional development could be considerable. Before placing a new downtown-like urban hub at Point Wells, the County must evaluate and address the likelihood of “mushroom development” near Point Wells-- that is, off site sub-developments designed to benefit from or serve the new “Urban Center” at Point Wells. The massive Point Wells Urban Center will not exist in vacuum, but will almost certainly lead to further development in the immediate vicinity.

- The EIS must examine not just the impacts of the Point Wells Urban Center itself, but also the cumulative impacts of additional development, known as “mushroom” development, caused by the new Urban Center.

### **Aesthetics Issues**

The large number of buildings at Point Wells will cause increased light pollution, view and sunlight obstruction, and glare for Richmond Beach residents.

- The EIS should examine methods to minimize and mitigate light pollution and glare caused by the development at Point Wells.
- The EIS should examine the obstruction of sunlight and scenic view corridors caused by tall buildings planned as part of the project.

The large amount of additional traffic travelling to and from Point Wells will cause increased light pollution and glare for residents along Richmond Beach Drive and Richmond Beach Road.



- The EIS should examine methods to minimize and mitigate light pollution and glare caused by the increased vehicle traffic.

The Point Wells development will have some on-site generation of power but it is not clear whether the on-site generation facilities will supply all the power for the site. If they do not, then additional power lines will have to be run to the site.

- The EIS should examine the aesthetic, environmental and health impacts of new high voltage electrical lines routed through existing residential neighborhoods.

### **Public Services**

The Point Wells development will include over 3,000 new housing units. The Final EIS for the Point Wells Urban Center Comp Plan designation estimated that over 500 students will live at Point Wells once the development is completed. While the development is in the Edmonds School District, there is no direct road access to schools in that district and Point Wells is much nearer in road distance to schools in the Shoreline School District. It is not clear which school district Point Wells students will attend.

- The EIS should examine the potential impact on Shoreline Schools. This should include whether the local schools (especially Syre Elementary, Einstein Middle School, and Shorewood High School) have room to accept students from Point Wells that choose to attend schools in the Shoreline School District.

It is also not clear whether school transportation will be available to either the Edmonds School District or Shoreline School District. If no school transportation is available, that could generate additional trips during peak morning hours and in the afternoon hours, especially on roads leading to the three nearest schools. Syre Elementary is a particular problem as it is located at the end of a dead-end road that is not directly linked to any arterial.

- The EIS should examine whether school transportation will be available at Point Wells.
- The EIS should examine the potential impact of increased traffic around the three local schools as students are dropped off in the morning and picked up in the evening.
- The EIS should examine the potential for increased traffic on neighborhood streets on all routes to Syre Elementary.

The Point Wells development will generate somewhere between 10,000 and 20,000 additional vehicle trips each day. Most of this traffic will travel up Richmond Beach Road to the intersection of Richmond Beach Road and 8<sup>th</sup> Ave. NW. This intersection is the only arterial connection between the Richmond Beach neighborhood and the City of Shoreline. Fire and police responders must travel through this intersection and other intersection further east along Richmond Beach Road to respond to emergencies in the Richmond Beach neighborhood.

- The EIS should examine the impact the large amount of increased traffic at this intersection and other intersections further east along Richmond Beach Road will have





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on response times for fire and police personnel responding to calls from the Richmond Beach neighborhood.

### **Utilities**

Because of Point Wells' location in unincorporated Snohomish County adjacent to two different municipalities, it is not clear which agencies will provide utility services to the site. The Point Wells development will have some on-site generation of power but it is not clear whether the on site generation facilities will supply all the power for the site. If it does not then additional electric lines will have to be run to the site.

- The EIS should address how utilities will be provided to the site, and how the provision of utilities by existing agencies will affect capacity, service availability, and rates for current customers.
- The EIS should examine whether additional electrical lines will be needed to supply power to the development.
- The EIS should examine several different routes for any new electrical or other utility lines needed by the development, in order to minimize environmental harm and impacts on the surrounding residential community.

### **Additional Alternatives**

Snohomish County has announced the EIS will study 3 alternatives: 1) an Urban Center with 3085 housing units, 2) an Urban Village with 2700 housing units, and 3) no action. The alternatives are inadequate, as demonstrated by the Addendum to Snohomish County's Final EIS for the Point Wells Urban Center Comp Plan designation, which also included an alternative with 1800 housing units, 20,000 sq. ft. of retail space, and 115,000 sq. ft. of commercial space.

- Since the Urban Village alternative only reduces the housing unit count by 12%, the EIS should also include the 1800 housing unit alternative used in the Addendum to the Final EIS as a "middle ground" which reduces the housing unit count by 41%.
- The EIS should also address a reasonable range of alternatives for providing secondary access to the site, including re-opening a road to the east into Woodway and developing a new road along the BNSF rail line running north toward Edmonds. The impacts of the development with and without the secondary access should be considered for each access alternative.