



Richmond Beach Advocates

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Darryl Eastin – Principle Planner
Snohomish County Planning and Development Services
3000 Rockefeller Ave. M/S 604
2nd Floor, Robert Drewel Building
Everett, WA 98210

Dear Mr. Eastin:

This joint letter supplements earlier comments submitted by Save Richmond Beach and Richmond Beach Advocates concerning the scope of Environmental Impact Statement (EIS) for the proposed Urban Center development at Point Wells.

Both organizations' earlier comments noted the serious limitations and potential for adverse impacts at Point Wells due to, among other things, its limited access and location adjacent to a slide-prone bluff. However, our comments did not thoroughly address the landslide hazards in the immediate vicinity of Point Wells. In light of the terrible tragedy in Oso, we feel compelled to further highlight these hazards, and to insist that Snohomish County carefully evaluate and eliminate them before permitting *any* new residences – let alone 3000 – in this slide-prone area. To do otherwise would risk further loss of life as a result of residential construction in a known landslide hazard area, which is simply not acceptable.

The following excerpt from the 2009 Draft Supplemental Environmental Impact Statement (DSEIS) for the Point Wells Comprehensive Plan Amendment describes the landslide hazard in the vicinity of Point Wells:

Review of the Map Showing Recent and Historic Landslide Activity on Coastal Bluffs of Puget Sound Between Shilshole Bay and Everett, Washington (Baum 2000) indicates two landslides initiated in the upper portion of the steep slope located east of the Paramount site during the winters of 1995/1996 and 1996/1997.

...

The slope to the east of the site contains historic landslides and has slopes steeper than 33% that are underlain by permeable soils (advance outwash) overlying impermeable soils (Lawton clay). As such, the slope east of the Paramount site meets the criteria of a landslide hazard area.

...

[T]he requested zoning change would allow for mixed use development consisting of housing, commercial space, retail businesses, public recreation areas, and a transit center. Under these potential uses, there may be a potential for seismically induced liquefaction and an increased potential for erosion and landslide.



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As the DSEIS notes, not only is Point Wells located in a known landslide hazard area, but the proposed Urban Center development there creates an *increased* risk of erosion and landslide.

To evaluate and adequately address these risks, the environmental review for the proposed Point Wells Urban Center must, at a minimum, include the following:

- A comprehensive geological study to better understand the risk of erosion and landslide in the vicinity of Point Wells, including the risk of a deep-seated or catastrophic landslide.
- The potential loss of vehicular access at Point Wells, including emergency access, due to a landslide.
- The potential for train derailment in the vicinity of Point Wells due to a landslide. (Recall that the 1996/1997 Woodway Bluffs slide knocked several railcars into Puget Sound approximately 1 mile north of Point Wells.) This is an acute concern given the number of oil trains passing Point Wells each day. In the past year alone, oil train derailments in Quebec and North Dakota have had tragic impacts on local communities and ecosystems. The County should address and mitigate the risk of such an event at Point Wells.
- The increased risk of landslides due to any construction or development activities at Point Wells (as noted in the 2009 DSEIS). This evaluation should include the impact of the proposed development on the slope itself, as well as surface water flows and groundwater recharge in the vicinity of Point Wells.
- The adequacy of any mitigation, including engineering controls, to prevent or reduce the damage from a catastrophic deep-seated landslide.
- Whether there are suitable alternate locations or configurations for the proposed Urban Center that have a lower risk of landslide hazards.
- The impacts of a Point Wells-related landslide on nearby residences, including those located on the Woodway Bluffs and along Richmond Beach drive.

We share the County's sorrow over the Oso tragedy, and look forward to working with you to ensure something like this never happens again. Our citizens deserve nothing less.

Regards,

/s/ [signed electronically]

Tom Mailhot
President, Save Richmond Beach

/s/ [signed electronically]

Bill Willard
President, Richmond Beach Advocates

Cc: John Lovick, Snohomish County Executive
Snohomish County Council
City of Shoreline
Town of Woodway
Richmond Beach Community Association