

## Countryman, Ryan

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**From:** Tom McCormick <tommccormick@mac.com>  
**Sent:** Wednesday, February 24, 2016 6:17 PM  
**To:** Countryman, Ryan  
**Cc:** Gretchen Brunner; Richard Schipanski; Mike Swenson, PE, PTOE; Kurt Gahnberg; Tom Mailhot; Debbie Tarry; Gary Huff  
**Subject:** Re: Assumed Buildout By 2045

Thank you Ryan.

You are correct that it does not alter my broader point. I believe that it is overly optimistic and thus unreasonable to assume a 2035 full buildout. As far as I know, no steps have even been taken to prepare a DEIS for the cleanup. I haven't even seen a scoping notice.

If the EIS for the Point Wells project is any gauge, the cleanup EIS could take five years or more (with appeals). In February 2014, scoping for the project EIS began. If things go smoothly, a DEIS might be issued in summer 2016. It could take at least two years to issue the FEIS, bringing us to mid-2018. (Note: Going from DEIS to FEIS took 14 months for the Frogmal Estates proposal (a small development by comparison; 112 lots for single-family homes), so it's not unreasonable to assume that the far more complex Point Wells FEIS will take two or more years.) There will undoubtedly be challenges to the FEIS which will be raised at the time of the hearing on the merits of the application. My guess is that the hearing might occur in early 2019, and that the appeal process will not be done until the end of 2021. If the outcome is favorable for BSRE, apparently then Paramount would work with Ecology to start the DEIS for the cleanup. So add another four years for the FEIS and Ecology decisions (with hearing and appeals) — that brings us to the end of 2025. Then the cleanup begins (at least for the first stages, maybe more, depending on what Ecology says). If that takes five years, that brings us to 2030. Then add 15 years for completion of construction for all phases. That brings us to 2045 for full buildout.

If any of my estimates above are out of line, could you please let me know.

Thank you.

Tom McCormick

> On Feb 24, 2016, at 4:54 PM, Countryman, Ryan <ryan.countryman@snoco.org> wrote:

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> Hi Tom,

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> The DEIS will include discussion of buildout assumptions. Any comments regarding timing that are submitted during the formal Draft EIS comment period must be responded to in the Final EIS. While it doesn't much alter your broader point, the DEIS will be using a 2035 buildout assumption, not 2030. This change was made to synchronize the EIS assumptions with Snohomish County's growth targets and comprehensive planning which both go to 2035. The change might have occurred after the preliminary draft that you are referring to, but I haven't gone back to check the when the decision was made. In any event, I want to clarify that we are using 2035 for the DEIS.

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> Ryan Countryman

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> -----Original Message-----

> From: Tom McCormick [mailto:tommccormick@mac.com]

> Sent: Wednesday, February 24, 2016 4:06 PM

> To: Countryman, Ryan

> Cc: Gretchen Brunner; Richard Schipanski; Mike Swenson, PE, PTOE; Kurt Gahnberg; Tom Mailhot; Debbie Tarry

> Subject: Assumed Buildout By 2045

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> Ryan,

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> It would appear that if BSRE's application eventually gets approved, construction of the development at Point Wells would likely not commence until at least 2030, taking into account the lengthy FEIS and permit approval process that still remains (plus appeals), and the extended time period needed for the cleanup FEIS (plus appeals) and the cleanup itself.

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> Given that the full buildout date is expected to be over a 15 to 20-year period (see the March 2015 preliminary draft of the DEIS's CHAPTER 2 DESCRIPTION OF PROPOSED ACTION(S) AND ALTERNATIVES, saying that, "Full buildout would be expected to occur over a 15 to 20-year period."), one would expect that with a 2030 construction start date, the full buildout would be completed by 2045 at the earliest, not by 2030 as the preliminary draft of the DEIS assumes (see the March 2015 preliminary draft, saying that, "for purposes of analysis in this EIS, buildout is assumed to be completed by 2030").

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> We believe that it is extremely unreasonable to assume that full buildout will be completed by 2030. Instead of 2030, we believe that it is more realistic and reasonable to assume that full buildout will be completed by 2045, when taking into account the lengthy FEIS and permit approval process that still remains (plus appeals), and the extended time period needed for the cleanup FEIS (plus appeals) and the cleanup itself.

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> We respectfully request that the DEIS be written to assume that full buildout will be completed by 2045, and we request that traffic modeling and all other modeling and studies be performed with full buildout assumed to be 2045.

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> An assumed buildout date of 2030, 2035, or 2040 will surely be challenged as being unreasonable.

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> Thank you.

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> Tom McCormick

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