



Eastin, Darryl

From: Bill Willard <bill@billwillard.com>
Sent: Monday, March 03, 2014 4:06 PM
To: Eastin, Darryl
Subject: FW: Point Wells Scoping comments
Attachments: CCE03032014_0000.pdf

From: Bill Willard
Sent: Monday, March 03, 2014 3:56 PM
To: 'Darryl.Eastin@co.snohomish.wa.us'
Subject: Point Wells Scoping comments

Dear Mr. Easton;

Please see attached.

Sincerely,

Bill Willard

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March 3, 2014

Snohomish County Planning and Development Services
Attn: Mr. Darryl Eastin, Project Manager
3000 Rockefeller Avenue
Everett, WA 98201-4046

Dear Mr. Eastin:

I am writing to provide Snohomish County with my comments on the scope of the Environmental Impact Statement (EIS) for the development of Point Wells.

As an initial comment, the current alternatives set out are not sufficient to properly evaluate the potential impacts. There is no true “no action” alternative. The current no action is explicit in setting out that it looks to increased industrial activity – that is not a “no action” alternative. That would be an increased industrial activity alternative. Further, the two currently stated project alternatives are only looking at projects with a small percentage differences in the units built. These area really only two alternative. A large project, as proposed by the developer, or a hypothetical industrial expansion. The large development as proposed must be part of the EIS. The increased industrial scenario would seem unlikely given the site’s location and current land use regulations. The EIS should have a true “no action” alternative and should look at other development scenarios with significantly different project sizes so that decision makers can accurately evaluate the impacts and alternatives as intended by the EIS process.

I request that Snohomish County study and address these specific elements in the EIS:

Natural Environment

Geology and Soils

The Point Wells development site is sand spit covered with fill materials. In the event of an earthquake it would subject to liquefaction. In addition, the sand and fill materials could slide into Puget Sound during an earthquake. The site is also at risk of tsunamis damage. A geotechnical report is needed to address these risks and whether mitigation is possible. There are also slide prone areas located along Richmond Beach Drive and on the east side of the

Point Wells site. Geotechnical analysis is required to address potential life safety and transportation hazards of these slide zones.

Shorelines

The development of Point Wells as proposed will have significant impacts on the near shore and off shore environments. Any EIS must evaluate these impacts. The EIS should further address the impacts of the required hazardous waste remediation at the site on water quality and shoreline habitats.

An additional study should be required to analyze the effects of sea level rise on the Point Wells site to understand how this could impact the proposed development.

Wetlands

A number of wetlands exist in the project area and an analysis of potential on and off site impacts to the wetlands and wetland species is necessary to ensure that the functions and values of the wetlands are not degraded.

Wildlife, Fish and Vegetation

The intertidal areas around Point Wells and the forested areas are important to biodiversity in the area and serve as wildlife corridors. Further study of these resources to identify impacts and to develop mitigation measures is needed.

Air Quality

A special study needs to be conducted to evaluate possible remediation methods for the remediation of hazardous materials present at the site. During remedial action work hazardous materials can become air borne if control measures are not properly implemented. As site soils are disturbed, hazardous substances in the contaminated soil such as heavy metals and hydrocarbons could become airborne posing a threat to public health and the environment. Soil remediation must be carried so as to safeguard public health and the environment. The developer has publicly stated that the project will occur over many years. The project proposal should be specifically examined for impacts caused by the long duration of construction.

Built Environment

The Point Wells project as proposed would increase the population of the area several fold. All of these residents will need to travel to and from Point Wells. The EIS must fully evaluate the impacts of traffic and examine realistic mitigation measures. Traffic impacts from this development will radiate from the project site to Seattle, Edmonds, I-5 access points, throughout the City of Shoreline. Shoreline and Woodway in the project area have streets without sidewalks, curbs or gutters. This presents enormous impacts to pedestrian and bicycle rider safety. Immediately south of the project site is Kayu Kayu Ac Park. Pedestrian and

bicycle access to this park could become impossible given the volume of traffic projected on Richmond Beach Drive. The roads in the area generally lack shoulders and up to date drainage systems. The traffic from the Point Wells project as proposed will significantly degrade the traffic systems in the area.

Traffic analysis should include peak hour impacts on the road system, distribution and track trips throughout the system. Trips east of Aurora should be analyzed to I-5 on 185th, 175th, and Meridian at a minimum. Evaluation of the traffic impacts must study cut-through traffic impacts and identify adequate mitigation measures.

The project is stated to be developed over many years. The long duration of construction requires that the impacts associated with construction traffic be specifically evaluated. Measures to mitigate the long term construction related impacts should be identified.

Neighborhoods

During Construction the Richmond Beach neighborhood will be significantly impacted by the development of Point Wells. This neighborhood will suffer significant adverse impacts related to multiple years of construction and soil remediation related traffic, noise, dust and visual blight. After the project is occupied there will be a massive increase in traffic.

Mitigation measures to avoid, reduce and minimize these impacts need to be identified in the EIS.

Cultural Resources

Point Wells was likely used by native peoples given its location and topography. A special study of archeological and historic resources should be conducted as part of the EIS on the Point Wells site.

Hazardous Waste

Soil remediation

The site contains significant amounts of soil contaminated with petroleum and related materials. The remedial methods to be used are of great concern to the residents of Shoreline. Various remediation methods should be studied as part of the EIS.

Thank you for this opportunity to provide comments on the scope of the Environmental Impact Statement.

Sincerely,


Bill Willard