

Chapter 4. Draft SEIS Comments and Responses

4.1. Overview

Chapter 4 of this Final SEIS contains responses to the written comments on the Draft SEIS provided during the comment period. The comment period for the Draft SEIS extended from February 6, through March 23, 2009.

4.2. Public Comments

The County received nine comment letters or emails from state and local agencies and eight public comment letters or emails during the comment period. Table 4-1 contains a list of the comments submitted, the author of the comment, and the date it was received by the County. Table 4-2 provides a response to the comments from each letter or email and a copy of each comment letter or email follows Table 4-12.

Table 4-1. Docket XIII Draft SEIS Comment Letters–Paramount of Washington LLC

Letter Number	Date Received	Author
Public Agencies		
1.	February 24, 2009	Community Transit
2.	February 13, 2009	Port of Edmonds
3.	February 24, 2009	City of Shoreline
4.	March 11, 2009	City of Shoreline
5.	March 23, 2009	City of Shoreline
6.	March 2, 2009	Shoreline Fire Department
7.	February 24, 2009	Town of Woodway
8.	March 23, 2009	Town of Woodway
9.	March 18, 2009	Washington State Department of Transportation
Public Comments		
10.	February 16, 2009	Marcellus Buchheit

Letter Number	Date Received	Author
11.	March 23, 2009	Bob Ferguson, King County Councilmember
12.	February 27, 2009	Gary Huff, Karr Tuttle Campbell
13.	March 23, 2009	Gary Huff, Karr Tuttle Campbell
14.	February 27, 2009	Douglas Luetjen, Karr Tuttle Campbell
15.	March 14, 2009	Gary Reiersgard
16.	February 23, 2009	Richmond Beach Community Association
17.	March 10, 2009	Whitney Storm

4.3. Responses to Comments

The responses listed in Table 4-2 are numbered to correspond to the numbers shown in the left-hand margin of the comment letters. Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. These comments will be forwarded to the appropriate decision-makers as part of the Final SEIS. Comments that ask questions, request clarifications, propose corrections, or are related to the Draft SEIS are provided a response that explains the approach, offers corrections, or provides other appropriate replies.

Table 4-2. Responses to Comments

Comment Number	Response
Letter #1: Community Transit	
1.	The comment is noted.
2.	The comment is noted. Analysis of impacts from adoption of Docket item GPP16 Fully Contained Communities (FCC) was included as a part of Addendum No. 13 to the FEIS for the Snohomish County GMA Comprehensive Plan 10-Year Update. Addendum No. 13 was issued February 9, 2009, relating to adoption of amendments to the General Policy Plan as part of Final Docket XIII, Batch 2. An Addendum to an EIS provides additional analysis and/or information about a proposal or alternatives where their significant environmental impacts have been disclosed and identified in previous environmental documents (WAC 197-11-600(3)(b)(ii)). No significant impacts beyond those identified in the County's EIS for the 10-Year Update and the 2006 Supplemental EIS are expected to occur for this nonproject action.
3.	The comment is noted. GPP17 Rural Population Target Reduction and GPP18 Rural Cluster Subdivisions (RCS) were included in Addendum No. 13. Please see response to Comment 2, this letter. GPP19, regarding Purchase of Development Rights (PDR), was not included in an environmental review because the Council and staff concluded that the existing GPP text allows creation of a countywide PDR program.
4.	The comment is noted. Analysis of impacts from adoption of Docket item GPP2 Cathcart Area was included in Addendum No. 11. Please see response to Comment 2 of this letter.
5.	The comment is noted. The transportation assessment presented in the Draft SEIS states that the build-out of mixed use development under the proposed zoning would be expected to provide adequate density to support transit service at the site. However, it also indicates that it is construction of a train station to support commuter rail is "not considered feasible in the foreseeable future." Sound Transit did identify a potential "provisional" station at Point Wells as part of Sound Move (Sound Transit 2005). However, the provisional station was not carried into the Sound Transit 2 (ST2) Plan, which reflects the current plan through 2023 (Sound Transit 2009). Thus, for the 2025 transportation analysis reflected in the SEIS, it was determined that assumption of a high capacity rail station is not reasonable. Potential mitigation measures

Comment Number	Response
	have been added to Chapter 3.14 that indicate that before approval, future Urban Center proposals will clearly demonstrate how high-capacity transit meets an appropriate level of service and that Urban Center designation is contingent on providing all-day access to transit and a planning process involving surrounding jurisdictions.
6.	The comment is noted.
7.	The comment is noted. Please see response to Comment 5 of this letter.

Letter #2: Port of Edmonds

1.	The comment is noted. Boating facilities are an allowed use in the County's Shoreline Management Master Plan Urban designation. Marinas are not listed as a permitted use in either the existing Heavy Industrial zone or the proposed Planned Community Business zone. However, the planning department may administratively approve a use not specifically listed if it is similar to other permitted uses. (SCC 30.22.040)
2.	<p>As commenter notes, The Town of Woodway's Comprehensive Plan, LUP-21, indicates that a marina may be a potential use at the Point Wells site (Draft SEIS page 3.14-11). The object of the Proposed Action is to assure continued compliance with the GMA and Countywide Planning Policies: allow for a range of housing types affordable to different income levels; and provide for employment growth proportionate to population growth (Draft SEIS page 2-6). Potential impacts from a marina at the Paramount site were not addressed in the EIS, because a marina was not part of the Proposed Action and does not meet the objectives of the Proposed Action. However, this does not preclude a future proposal for a marina at this location. Please see the response to Comment 1 of this letter.</p> <p>If a marina proposal is put forward in the future, it would have to be evaluated for physical, chemical, and biological effects. Construction of a marina would require some sort of breakwater and/or modification of the shoreline. These changes could influence currents and sediment transport, shading, and the distribution and quantity of marine habitat. If the proposal had an effect on local currents, the project would have to be evaluated for possible changes to sediment transport, shoreline scour and erosion. Additional analyses would be needed for the removal of the existing pier and replacement with the marina, including disturbance of potentially contaminated sediments and the effect of pile driving noise on fish and marine mammals. Marina operations would likely be analyzed for potential impacts on water quality from vessels, including the potential for fuel and sewage spills. Alteration of marine habitat would likely require the development of a marine habitat disturbance minimization, mitigation, and monitoring plan. In addition, a marina would change the recreational opportunities at the site, which would likely require additional evaluation.</p>
3.	The comment is noted. Please see response to Comment 1 of this letter.
4.	The comment is noted.

Letter #3: City of Shoreline

1.	The comment is noted.
2.	The comment is noted. The Planning Commission considered the Paramount Draft SEIS oral and written testimony that was submitted during the Draft SEIS comment period and then deliberated at its March 3 and March 24, 2009, meetings. No recommendations were forwarded to the County Council. The County Council will consider the Final SEIS prior to its final decision.
3.	The comment is noted. Please see response to Letter 1, Comment 5.
4.	The comment is noted. The employment numbers were based on employment assumptions in the Snohomish County 2007 Buildable Lands Report and the maximum employment that could develop under the Proposed Action. The actual number of jobs will depend on the final development plans.
5.	The comment is noted. This is a programmatic analysis that is reviewing the potential impacts associated with a change to land use and zoning designations. In order to disclose all potential impacts, this SEIS assumes the most intensive likely development scenarios and is not based on a specific development proposal. It is anticipated that any future specific development proposal would fall below the development levels described in this SEIS. Also, please see response to Comment 4 of this letter.
6.	The comment is noted. The SEIS programmatically assesses the potential impacts of the proposed land use designation and zoning change. Because this is a non-project action, the intent is to provide an order-of-magnitude assessment of potential impacts and mitigation. If the proposed land use designation and zoning change were approved, a site-specific

Comment Number	Response
	<p>development proposal would still need to be provided, which would be subject to detailed project-level environmental analysis. Project-level analysis would include a more detailed assessment of potential impacts, more detailed cost estimates of recommended improvements, the commitments of the applicant and local jurisdictions to fund future improvements, as well as any needed caps on development levels to ensure the balance between travel demand and infrastructure. Mechanisms would also be defined by which to ensure that the needed mitigation is implemented. It is expected that the County, applicant, and local jurisdictions would need to work closely together to determine the appropriate level of development, level of improvement needed to address impacts of a development proposal; and commitments by all involved parties.</p> <p>At the programmatic level presented in this SEIS, the majority of identified potential transportation impacts and mitigation measures are located in Shoreline. To address concerns raised by Shoreline, text has been added throughout Section 3.11 to clarify the methods and assumptions that were applied; and to put the conclusions and recommendations more clearly into a programmatic context.</p> <p>In addition, supplemental analysis has been added for the Final SEIS (as Section 3.11.5) to test the sensitivity of the impact and mitigation conclusions to alternate trip distribution assumptions that are more in line with Shoreline's expectations.</p>
7.	<p>The background traffic growth is derived from the travel demand model not from an annual traffic growth assumption. The modeling methodology reflects best practices in the industry and the land use assumptions used in the model are based on the most current available regional forecasts. The traffic volume forecasts in the No Action Alternative resulted from land use forecasts provided by the Puget Sound Regional Council (PSRC) and are consistent what is used in the latest version of the regional travel demand model. The County model uses trip tables created by PSRC. PSRC's land use is based on the adopted Comprehensive Plans for jurisdictions within the region. Outside of the County, PSRC projected land use was assumed. Inside the County, the County has adjusted land use distribution within forecast analysis zones (FAZs), but the total within each FAZ is comparable to PSRC projections. Text was added in Final SEIS Section 3.11.2 to clarify the source of the land use assumptions.</p> <p>Although the traffic volume projections were based on current land use forecasts, it is acknowledged that they are purposely conservative, in that they assume that future vehicle mode shares would be of similar proportion as they have been historically; and do not take into account possible future regional and/or local transit enhancements or demand strategies intended to reduce vehicle volumes. This allows the programmatic assessment to consider "worst case" cumulative conditions (No Action Alternative plus Proposed Action). Text has been added to the No Action Alternative sections of Final SEIS Section 3.11.2 and Section 3.11.3 to clarify this; and also to clarify that No Action Alternative impact and mitigation assessments are programmatic and do not represent any commitments by Shoreline. Text has also been added to clarify that if more detailed project-level analysis indicates that No Action Alternative volumes are lower than those projected in the SEIS, the result could be either (1) some impacts may not be triggered due to cumulative conditions being lower than what was programmatically evaluated; or (2) some impacts identified under the No Action Alternative may alternatively be triggered by the Proposed Action. Subsequent project-level analysis would be needed to determine the appropriate agency and applicant commitments to future transportation improvements, based on the actual proposed development levels and phasing, and to provide implementing mechanisms to ensure those commitments.</p>
8.	<p>Text has been added to acknowledge that projected increases in traffic volumes would also increase the potential for safety conflicts, particularly on Richmond Beach Road. It is not feasible at the programmatic level to provide detailed assessment of potential safety conflicts. However, text in Section 3.11.3 has been added to clarify that the mitigation measures identified to address operational issues in the SEIS would also need to be designed to address safety issues. In addition, some measures such as the addition of a traffic signal at Richmond Beach Rd/15th Avenue, would directly address potential safety issues.</p>
9.	<p>Although the SEIS acknowledges that the density evaluated in the SEIS would be sufficient to support direct transit service, the comment is correct that the trip generation assumptions did not consider a higher share of transit use than is already implicit in the Institute of Transportation Engineers (ITE) trip generation rates, which reflect a low transit usage. This allows the programmatic assessment to consider "worst case" cumulative conditions (No Action Alternative plus Proposed Action). Please also see the response to Comment 7 of this letter.</p>
10.	<p>The comment is noted and is consistent with the assumptions used in the transportation analysis. Please see response to Comment 9 of this letter.</p>
11.	<p>The comment is noted.</p>
12.	<p>Amount and Type of Park Facilities Required: As stated on page 3.12-4 of the Draft SEIS, current Snohomish County Level of Service Standards for parks call for one additional community park per 21,000 additional residents. The potential</p>

Comment Number	Response
	<p>population increase under the Proposed Action would require an additional 8.7 acres of parkland. Additional text has been added to clarify this discussion in Section 3.12.2. Please see Chapter 3 of this Final SEIS for additional information and corrections.</p> <p>Impact to City of Shoreline Park Facilities: The impact analysis in Section 3.12.2 has been amended with additional text regarding the potential for impacts on Shoreline park facilities, particularly Richmond Beach Saltwater Park. Please see Chapter 3 of this Final SEIS.</p> <p>Recreation Facilities and Programming: Section 3.12.2 has been amended to include additional mitigation for impacts on parks and recreation, including a requirement for the Shoreline Department of Parks, Recreation, and Cultural Services to be consulted during the design process for any future project. Additionally, a mitigation measure has been added requiring developments that increase the population of the site by a specified amount to provide active recreational opportunities on the site, which could reduce the potential for impacts on Shoreline facilities.</p>
13.	The comment is noted. See response to Comment 12 of this letter. Additional mitigation requiring consultation with Shoreline has been added. See Section 3.12.2.

Letter #4: City of Shoreline

1.	The comment is noted. Section 3.12.1 has been amended to note that the Shoreline Police Department provides first response police services under an existing Memorandum of Understanding with the County. Text has also been revised to state that Shoreline will discontinue first response police service to the Point Wells area when and if the site is redeveloped as an Urban Center.
2.	Adequacy of Sheriff's Department Service: The Snohomish County Sheriff's Department acknowledges that, due to the geographic isolation of the Paramount site and the current agreement with the Shoreline Police Department, few resources are currently available to provide police services to the area. In a letter dated May 19, 2009, the Snohomish County Sheriff's Department expressed its readiness to assume police services for the Paramount site, both in the near-term and on an ongoing basis. Additional text detailing the potential impacts on the department in terms of funding, equipment, and human resources has been added to Section 3.12.1, as well as potential mitigation measures to alleviate these impacts.
3.	The comment is noted. The Paramount site is in the Woodway MUGA. There is an expectation that property in an UGA will remain urban and eventually be annexed to its associated city. In this case, the site has been used as a high intensity industrial site for decades and is serviced by water, sewer, electricity, natural gas, solid waste disposal, telecommunications and fire and police services. Most of those services would need to be augmented to service a high density, mixed-use development and in some cases, capital facilities plans have included the potential for additional infrastructure at the site. Mitigation measures have been included in Section 3.12.1 stating that agreements for all services, including fire, emergency management, and police, would be required prior to future development approvals.

Letter #5: City of Shoreline

1.	<p>The trip distribution assumption for traffic generated at the proposal site was based on a trip distribution of an existing zone located close to the site that consists of mixed land uses, similar to what would occur under the proposal. This was considered to be a reasonable basis for the trip distribution assumption. It should also be noted that the origin-destination trip distribution graphics represent the shares of traffic coming in and going out of the project area, and not the actual routes used to travel. Regardless of the direction of the ultimate destination, all vehicles generated at the site are traveling through Shoreline either for local trips, or to access the regional transportation system.</p> <p>However, to address Shoreline's concerns regarding site-generated trip distribution, a supplemental sensitivity analysis was completed for the Final SEIS, in which site-generated trip distribution was assumed to be split 50% to the north, and 50% to the south. This was combined with an adjustment to the model output that maintained a higher volume of site-generated traffic on Richmond Beach Road/196th/195th/185th, between Richmond Beach Drive and SR 99 (please also see response to Comment 4 of this letter). The result of combining these assumptions was an analysis scenario that reflected more intense impact on Richmond Beach Road/196th/195th/185th and SR 99, and a lower level of impact on alternate routes through north Shoreline and Edmonds. Planning-level cost estimates indicate that the total cost of mitigation would be slightly lower under this scenario, because recommended mitigation is decreased at three locations, and increased at one location.</p> <p>However, the results of the supplemental sensitivity analysis do not change the overall conclusions of the programmatic transportation analysis—that surface transportation impacts resulting from the proposal would be considerable, and would require a high level of mitigation; also that project-level environmental analysis would be required at the time site-specific development proposal is developed, at which time potential impacts related to the development, appropriate</p>
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Comment Number	Response
	mitigation, and commitments by agencies and the applicant would be determined. The supplemental sensitivity analysis is provided in the Final SEIS as Section 3.11.5.
2.	The comment is noted. Please see response to Letter 3, Comment 7.
3.	Although the SEIS acknowledges that the density evaluated in the SEIS would be sufficient to support direct transit service, trip generation assumptions did not consider a higher share of transit use than what is implicit in the ITE trip generation rates, which reflect a low transit usage, for the reasons stated in this comment.
4.	<p>The future traffic volumes used in the transportation analysis and presented in Appendix C of the Draft SEIS are based on the travel demand model developed for this project. Modeled streets primarily consist of those with functional classification of collector and above, and do not include many local streets. Because of higher volumes projected on SR 99, the model did project that a considerable amount of site-generated traffic would choose alternate paths on collectors and minor arterials within Shoreline to reach the regional roadway system. In addition, it showed that some traffic not related to the proposal would choose these alternate paths as a result of the increased traffic resulting from the proposal. This was considered a conservative assessment because it showed the potential for the project to increase congestion and adverse impacts on lower functioning roads, which in turn, is considered to be a more adverse impact than potential impacts on higher functioning roads such as SR 99.</p> <p>However, to address Shoreline's concerns regarding site-generated trip distribution, a supplemental sensitivity analysis was completed for the Final SEIS, in which an adjustment was made to the model output that maintained a higher volume of site-generated traffic on Richmond Beach Road/196th/195th, between Richmond Beach Drive and SR 99. This combined a revised assumption that site-generated trip distribution would be split 50% to the north, and 50% to the south. Please see response to Comment 1 of this letter.</p>
5.	It is true that because the County model was refined to conduct this analysis, the countywide transportation improvements are documented in detail, whether or not they affect travel patterns in the study area. The future year model network does include the business access and transit (BAT) lanes on SR-99, which is the only future King County project identified that would affect traffic in the study area. This information has been added to Appendix E of the Draft SEIS.
6.	<p>Transportation analysis zones were defined at the size needed to ensure that all analysis intersections within the study area would be modeled. Shoreline comprehensive plan zones were split and sufficient network links are added to capture accurate forecasts. Defining zones at the size needed to reflect the transportation analysis network reflects best modeling practice.</p> <p>The existing Shoreline model zone structure, as defined in the Shoreline Comprehensive Plan transportation element, was used as the starting point for determining the SEIS model zone structure. SEIS intersection analysis locations consisted of locations identified in the current Shoreline transportation element, with additional analysis locations in the vicinity of the site, and additional locations requested by Shoreline. This resulted in Shoreline model zones closer to the project site being divided into smaller zones. The road network in Shoreline was developed to include all streets where intersection analysis was conducted; which were confirmed Shoreline staff prior to initiating the analysis.</p> <p>If the Shoreline zones had been further divided, this would have resulted in a greater dispersion of modeled traffic, potentially resulting in lower projected volumes at the analysis intersections and segments.</p> <p>This comment is in conflict with Comment 4 of this letter, which indicates a concern that the model shows greater dispersion onto local streets than is likely to occur. If smaller zones had been defined, they would have been inconsistent level with the analysis network, and too great a modeled dispersion of traffic to local streets could have resulted. However, by defining the zone sizes at the level consistent with the transportation analysis network, this risk was avoided in the SEIS analysis.</p>
7.	Please see response to Letter 3, Comment 8.
8.	Please see response to Letter 3, Comment 6.
9.	The Draft SEIS indicates that the northern section of Richmond Beach Drive would require improvements to safely accommodate the amount of traffic generated by the Proposed Action. The list of recommended mitigation actions includes improving the northern section of Richmond Beach Drive to urban collector standards, with minimum 11-foot travel lanes and a separate pedestrian path.
9.a.	The comment is noted. The SEIS programmatically assesses the potential impacts of the proposed land use designation

Comment Number	Response
	and zoning change. Because this is a non-project action, the intent is to provide an order-of-magnitude assessment of potential impacts and mitigation. Since the action is a requested change in land use designation and zoning, and not a specific development proposal, the SEIS seeks to analyze the high end of the range of development that could be allowed under the proposal. It is not a development proposal. Please also see response to Letter 3, Comment 6.
9.b.	Please see response to Comments 1 and 4 of this letter and Letter 3, Comment 7.
9.c.	Please see response to Comment 9.a. of this letter.
9.d.	Please see response to Letter 3, Comment 8.
10.	Police and Fire Provision: Please see responses to Letters 4 and 6, all comments.
11.	Other Service Provision: Existing conditions and impacts to sewer service are discussed in Section 3.12.5. Regarding library service, the nearest branch of the Snohomish County Library System to the site is located in Edmonds at a driving distance of approximately 4 miles. The Shoreline branch of the King County Library System is approximately 4.5 miles away. The two facilities are sufficiently equidistant from the Paramount site that no clear assumptions can be made as to which library residents of the Paramount site would use. Additional mitigation has been added to Section 3.12.1 requiring Snohomish County to provide code compliance services to any new development authorized under the Proposed Action. Please see the response to Letter 3, Comment 12 regarding parks and recreation facilities.

Letter #6: Shoreline Fire Department

1.	Fire Service Existing Conditions: The comment is noted. Section 3.12.1 has been amended to clarify existing conditions, and Shoreline's decision not to continue first response service under the Proposed Action has been incorporated into the impact analysis. Text has also been revised to state that Shoreline will discontinue first response fire and emergency medical services to the Point Wells area when the site redevelops as an urban center.
2.	The comment is noted.
3.	Fire Service Impact Analysis: Section 3.12.1 has been amended with additional information provided by Snohomish County Fire District 1 regarding capacity to serve the Paramount site if the Shoreline Fire Department chooses to terminate its contract with the property owner and additional mitigation measures for fire protection have been added.
4.	The Paramount site is in the Woodway MUGA. There is an expectation that property in an UGA will remain urban and eventually be annexed to its associated city. In this case, the site has been used as a high intensity industrial site for decades and is serviced by water, sewer, electricity, natural gas, solid waste disposal, telecommunications and fire and police services. Most of those services would need to be augmented to service a high density, mixed-use development and in some cases, capital facilities plans have included the potential for additional infrastructure at the site. Mitigation measures have been included in Section 3.12.1 stating that agreements for all services, including fire, emergency management, and police, would be required prior to future development approvals. Also, please see response to Comment 3 of this letter.
5.	The comment is noted.

Letter #7: Town of Woodway

1.	The comment is noted. In recognition that the Paramount site is in the Woodway MUGA, consistency with the town's Comprehensive Plan was analyzed in Chapter 3.14 of the Draft SEIS.
2.	As this letter notes in Comment 3, below, this is a programmatic analysis that is reviewing the potential impacts associated with a change to land use and zoning designations. In order to disclose all potential impacts, this SEIS assumes the most intensive likely development scenarios and is not based on a specific development proposal. It is anticipated that any future specific development proposal would fall below the development levels described in this SEIS.
3.	As the comment notes, future environmental review of a specific development proposal is required under SEPA.
4.	The comment is noted. Please see responses to Letter 1, Comment 5 and Letter 5, Comment 3.

Comment Number	Response
5.	The comment is noted. The Draft SEIS addresses land use compatibility issues in Chapter 3.13 and addresses aesthetic and design considerations in Chapter 3.9. The design guidelines proposed by Woodway in Letter 8 are part of the record. Potential measures to mitigate possible incompatible land uses are included in the Draft SEIS, page 3.13-7
6.	The comment is noted. Please see responses to Comments 2 and 5, this letter. According to the GPP FLU map, the Urban Centers at I-5/128 th , Street I-5/164 th Street, and SR 527 have portions of their boundaries adjacent to designated and established single family residential neighborhoods. However, none of the Urban Centers are surrounded by single family areas.
7.	The comment is noted. The County is planning a new set of development regulations and zoning classification to replace the Urban Centers Demonstration Program, which expires on November 29, 2009. There will be an opportunity to comment on the proposed regulations during the public comment period and at public hearings and perhaps in separate meetings between the County and adjacent jurisdictions.

Letter #8: Town of Woodway

1.	Please see response to Letter 7, Comment 2.
2.	The design guidelines included in this letter are part of the record. Policies LU 4.B1 and 4.B.2 are included in the Draft SEIS (page 3.9-9) and a mitigation measure on page 3.13-7 recommends applying design standards or design review to minimize design incompatibilities with surrounding uses. Please see Letter 7, Comment 7.
3.	The comment is noted. Please see response to Comment 2 of this letter.
4.	The comment is noted. Please see response to Letter 7, Comment 2.
5.	The comment is noted.

Letter #9: Washington State Department of Transportation

1.	<p>The model projections indicate that very few site-generated trips would travel through the SR 99/SR 104 interchange. This is because for vehicles traveling between the site and SR 104 east of SR 99, there are more direct routes that do not require travelers to backtrack (e.g., travel west to access the interchange, only to travel back east on SR 104). For the portion of SR 104 west of SR 99, site-generated traffic would not need to use the interchange, and is captured in the analysis of the SR 99/244th Street SW intersection.</p> <p>For the additional SR 99 and I-5 locations listed in this comment, model projections indicate that site-generated traffic would be dispersed by the time it would reach these locations, which range in distance between approximately 3.5 and 5.5 miles from the proposal site, resulting in low percentages of expected traffic increase. Analysis indicates that with the planned Aurora Corridor Improvement in place, no significant impact is identified at SR 99/N 175th Street under either No Action or the Proposed Action Alternative. This is also the conclusion for the alternative trip distribution scenario that was completed for the Final SEIS, which assumes a higher proportion of site-generated traffic to travel between areas south and to travel on SR 99 rather than parallel routes (please see responses to Letter 5, Comments 1 and 4). It is expected that even lower numbers site-generated trips traveling through intersections to the south would not have a significant effect on operations at these locations.</p>
2.	The trip generation for residential units assumed an 80% occupancy rate of total potential dwelling units, which is consistent with County and regional modeling practice. As a mixed use land use designation can result in varying proportions of residential and commercial uses, a mix was defined for the purpose of the programmatic SEIS analysis that would result in a high end projection of total trips, to allow an order-of-magnitude assessment of potential impacts. This does not preclude a more detailed project-level environmental assessment that would be required at the time a proposed site plan is developed. At that point, sufficient information would be provided about the proposed level and mix of land uses, to allow more detailed trip projections to be completed, as well as subsequent detailed traffic analysis, based upon the actual proposed level and mix of development.
3.	<p>The trip generation calculation follows the ITE standard practice, and the presented estimate is a conservative and reasonable reflection of the proposed use. The Proposed Action would allow a mix of land uses in a compact development that will capture trips internally and encourage trips by non-auto modes. The analysis is based on the suggested adjustments to reflect the location and character of the development, as identified in ITE's Trip Generation Handbook (March 2001).</p> <p>The ITE Trip Generation data are based on data collected at individual sites; in other words, it assumes that every use</p>

Comment Number	Response
	would require vehicle trips to meet travel needs. Internal capture reflects reductions in auto trips between the uses. The development of a mix of uses at higher densities is often associated with increased numbers of pedestrian trips as the population is denser and more residents will live within walking distance to the proposed retail services and offices. We believe a 10% reduction for pedestrian trips is reasonable for this mixed-use development. The Trip Generation Handbook also identifies adjustments for pass-by trips. The 34% used in the study represents the average pass-by rate for the studies included in the ITE handbook.
4.	Please see response to Letter 5, Comment 4.
5.	Comment noted. Please see response to Letter 5, Comment 4.
6.	Text has been added regarding WSDOT LOS standards on HSS facilities, and indicating that the WSDOT standard for urban HSS facilities is LOS D. It is noted, however, that for the Aurora Corridor Improvement Project between N 165th Street and N 205th Street in the City of Shoreline, the design is based on the City's adopted standard of LOS E for that facility, which is reflected in the WSDOT-approved Transportation Discipline Report (City of Shoreline 2007) prepared for that project. In order to avoid inconsistency with the City's WSDOT-approved design standard for the Aurora Avenue corridor, the SEIS analyzed to a standard of LOS E. The HSS location in Edmonds was analyzed to a standard of LOS D.
7.	A correction has been made in the FSEIS to reflect the planned change in configuration at SR 99 / N 185th Street and SR 99/175th Street, resulting from Aurora Corridor Improvement between N 165th Street and N 185th Street (funded portion of N 165th Street–N 205th Street project). The result is a lower projected level of impact at both locations, under both the No Action and Proposed Action alternatives, than was reflected in the Draft SEIS.

Letter #10: Marcellus Buchheit

1.	The comment is noted. The impact of possible tsunami damage was not one of the subjects scoped in the SEIS. According to the City of Shoreline Hazard Mitigation Plan, there is no historical record of a tsunami in the Shoreline area. However, if a major earthquake occurred on the Seattle or Whidbey fault zones, low lying areas along the Puget Sound shoreline could be affected with very little warning. Potential impact (liquefaction) from seismic events is discussed in the Draft SEIS on pages 3.1-3 and 3.1-4
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Letter #11: Bob Ferguson, King County Councilmember

1.	The comment is noted. Please see responses to comments in Letters 4, 5, and 6.
2.	The comment is noted. Please see responses to Letter 3, Comments 6 and 8 and Letter 5, Comments 1, 8, and 9.
3.	The comment is noted. Please see responses to Letter 1, Comment 5, particularly regarding new mitigation measures; Letter 3, Comment 9; and Letter 5, Comment 7.
4.	The comment is noted. Please see responses to Letters 3 and 4.

Letter #12: Gary Huff, Karr Tuttle Campbell

1.	The comment is noted.
2.	The comment is noted.
3.	The comment is noted. Please also see Letter 7, Comment 2.
4.	The comment is noted.

Letter #13: Gary Huff, Karr Tuttle Campbell

1.	The comment is noted.
2.	Draft SEIS Section 3.1.2 (page 3.1-9) has been amended to reflect that the asphalt plant has never been shut down.
3.	Draft SEIS Section 3.1.2 (page 3.1-9) has been amended to clarify Mitigation Measures and Significant Unavoidable Adverse Impacts.
4.	Draft SEIS Section 3.4.2 and Section 3.5.1 have been amended to clarify the risks of an oil spill under the Proposed Action.

Comment Number	Response
5.	The comment is noted. Please see responses to Letters 3 and 5.
6.	Section 3.13.1 has been amended to clarify the impacts from loss of industrially zoned land.
7.	The comment is noted. Draft SEIS Section 3.14.4 includes a mitigation measure that could achieve consistency between the Proposed Action and LU Policy 5.B.12. Addendum No. 13 for Final Docket XIII Batch 2 Proposals, issued February 9, 2009, analyzed the suggested language and determined it does not substantially change the analysis or conclusions of the December 13, 2005 Final EIS for the GMA Comprehensive Plan. Please see Letter 1, Comment 2.
8.	Section 3.14.3 has been amended to clarify the analysis of consistency with The Town of Woodway's Point Wells Subarea Plan.

Letter #14: Douglas Luetjen, Karr Tuttle Campbell

1.	The comment is noted.
2.	The comment is noted.
3.	The comment is noted.
4.	The comment is noted. Please see response to Letter 1, Comment 5.
5.	The comment is noted.
6.	The comment is noted. Also, please see Draft SEIS pages 3.14-9 to 3.14-12 for a discussion of consistency with Woodway policies and pages 3.14-12 to 3.14-14 for a discussion of consistency with Shoreline policies.
7.	The comment is noted. See page 3.12-5 for mitigation measures, including development impact fees and related park and/or open space dedication requirements.
8.	The comment is noted.
9.	As commenter notes, there is an opportunity restore the shoreline. Please see Draft SEIS page 3.4-6 for a discussion of potential shoreline restoration opportunities.
10.	The comment is noted. The Draft SEIS, page 3.11-46, indicates that while a build-out of mixed use development would be expected to provide adequate density to support transit service at the site, construction of a train station to allow direct rail service at the site was not considered reasonable in the foreseeable future. At the present time, Sound Transit has no plans to build a station at a Paramount or Richmond Beach location. Please see response to Letter 1, Comment 5. An amendment to Goal LU 3 was analyzed as a part of Addendum No. 13 to the FEIS for the Snohomish County GMA Comprehensive Plan 10-Year Update to add the following underlined language: Establish compact, clearly defined mixed-use centers that promote a neighborhood identification and support the County's sustainability goals.
11.	The comment is noted.
12.	The comment is noted. Please see updated SEIS section 3.12 in Chapter 3 of this Final SEIS.
13.	The comment is noted. Please see updated SEIS section 3.12 in Chapter 3 of this Final SEIS.
14.	The comment is noted. Also, please see Draft SEIS page 3.4-6 for a discussion of potential shoreline restoration opportunities.

Letter #15: Gary Reiersgard

1.	The comment is noted. Responses to the specific comments follow.
1.a.	The County issued a scoping notice on November 14, 2007, and invited the public to attend three meetings held in different parts of the County. By the scoping deadline, written comments from 34 agencies and individuals were received. Those comments were considered in the preparation of the Draft SEIS. Per WAC 197-11-620 (1) scoping is optional for SEIS (as noted in the Draft SEIS Section 2.1.4). Non-project EISs should be general and broad and do not have to include specific courses of action; a rezone does not have to be included. If a scoping notice is issued, there is no requirement to provide notice of a scope revision per WAC 197-11-408(4). In this

Comment Number	Response
	case, the inclusion of the rezone action would not change the range of environmental topics or the nature of the analysis.
2.a.	<p>WAC 197-11-442, Contents of EIS on nonproject proposals, says that if the nonproject proposal concerns a specific geographic area, site specific analyses are not required. It also states that the lead agency is not required to examine all conceivable policies but should cover a range of such topics. The EIS content may be limited to a discussion of alternatives that have been formally proposed or that are reasonably related to the Proposed Action.</p> <p>WAC 197-11-774 defines “nonproject” as actions which are different or broader than a single site specific project, such as plans, policies, and programs. WAC 197-11-704 defines a “project” action as one that involves a decision on a specific project, such as a construction or management activity located in a defined geographic area. The Proposed Action is a non-project action to change the FLUM designation and implementing zoning designation. It does not approve a private development action nor does it approve any site specific development conditions.</p>
2.b.	A rezone request can be a nonproject action pursuant to WAC 197-11-704. Please see Comment 2.a., this letter.
2.c.	The comment is noted. Draft SEIS Chapter 2.2 has been amended as shown in Final SEIS Chapter 3 to make consistent references to the Proposed Action as including both a comprehensive plan amendment and a rezone.
3.a.	The comment is noted. Unavoidable Adverse Impacts are shown in Table 1-2. To make it clearer for the reader, the elements with no Significant Unavoidable Adverse Impacts have been amended to show “None” in this Final SEIS, Chapter 1, Table 1-2.
3.b.	Please see response to Comment 3.a. of this letter.
3.c.	The Determination of Significance indicated there was a potential for significant adverse impacts. The SEIS was required to analyze the potential significant adverse impacts. Also, see response to Comment 3.a. of this letter.
3.d.	Text in the summary table is excerpted from the detailed analysis in Chapter 3. The intent of the text referenced in the comment is to advise readers to read the full analysis for additional context and background information. Draft SEIS Section 1.4.4 has been amended to clarify the intention.
3.e.	<p>This Final SEIS Chapter 1, Table 1-2, Air Quality, has been amended to delete Impacts paragraphs one and four through six because they are not impacts.</p> <p>Final SEIS Chapter 1, Table 1-2, Air Quality, has been amended to delete “No mitigation measures for air quality impacts would be required.”</p> <p>Final SEIS Chapter 1, Table 1-2, Wildlife and Vegetation, has been amended to delete Impacts paragraphs two through four because they are not impacts.</p> <p>Final SEIS Chapter 1, Table 1-2, Wildlife and Vegetation, has been amended to include Unavoidable Adverse Impacts.</p> <p>Final SEIS Chapter 1, Table 1-2, Relationship to Plans and Policies, has been amended to delete references to policies that are consistent with the Proposed Action and, therefore, are not impacts.</p> <p>Draft SEIS Chapter 3.5, page 3.5-5 has been amended to add Unavoidable Adverse Impacts for Wildlife and Vegetation.</p>
4.	The comment is noted. Please see response to Letter 2, Comment 2.
5.	A development proposal would follow the path outlined in SCC Chapter 30.34A, Urban Centers Demonstration Program, or as subsequently amended.
5.a.	The comment is noted. Please see response to Comment 5 of this letter.
6.	A request for a rezone can be approved as a legislative action and considered a non-project action under SEPA. Please see response to Comment 3.e. of this letter.
7.a.	The comment is noted. Please see response to Letter 2, Comment 2.
7.b.	While there would be no direct impacts on neighboring jurisdictions’ land use plans, the potential impacts of development pursuant to the proposed land use designation and zoning on land use compatibility with surrounding jurisdictions is discussed in Chapter 3.13. A review of the proposal’s consistency with neighboring jurisdictions’ policies is included in Chapter 3.14. Generally, the analysis indicates that discussions between the County, Woodway, and Shoreline regarding

Comment Number	Response
	development of the Point Wells site, e.g., design guidelines, provision of public services, transportation, need to occur.
7.c.	For specific responses to Appendix B referred to by the commenter, please see responses to Comments 11 through 16 below. Comments regarding consistency or inconsistency of the proposal to these policies are included in these responses.
8.a.i.	The comment is noted. Chapter 3.14 has been amended to include analysis of the SMMP Urban Environment management policies. Briefly, the Proposed Action is consistent with SMMP Urban Environment management policies 1, and 7 through 10. The Proposed Action may be consistent with Policies 3, 4, 5 and 6 and potential mitigation measures have been included. The Proposed Action is not consistent with Policy 2 as it is not a water-dependent use.
8.a.ii.	The Shorelines of Statewide Significance management principles are listed in the Draft SEIS, page 3.14-2. The consistency analysis on page 3.14-4 addresses some of the ways in which the Proposed Action addresses the management principles such as providing opportunity for public access to the shoreline, allowing redevelopment where intensive use already exists, and reducing adverse impacts by potential restoration of the shoreline area
8.a.iii.	The comment is noted. Draft SEIS Section 3.14.3. has been amended to include the relevant master program elements goals and general development policies and consistency analysis.
8.b.i.	The comment is noted. In developing the Draft SEIS, the intention was to include the most relevant policies that would provide substantive information for the reader, while trying to keep the Draft SEIS clear and concise. Please see Comment 2.a. of this letter. However, based on the comments, we have incorporated the policies cited by the commenter either as a response in this chapter or as an amendment included in Chapter 3. Responses to specific comments follow.
8.b.ii.	According to the policy, a location for an Urban Center includes a "regional high capacity transit route," which was interpreted as being reasonably similar to commuter rail. Please see Letter 1, Comment 5.
8.b.iii.	The Draft SEIS discussion notes that the policy is unclear and that the proposal may not be consistent with this policy.
8.b.iv.	As the commenter notes, there is no site specific information, so it is not possible to conclude whether the proposal meets site specific requirements. The policy consistency analysis in the Draft SEIS on page 3.14-6 states that the Proposed Action may not be consistent with policy LU 5.B.12. and mitigation was proposed on page 3.14-14. An analysis of impacts from the adoption of the proposed mitigation language for LU 5.B.12 was included as a part of Addendum No. 13 to the FEIS for the Snohomish County GMA Comprehensive Plan 10-Year Update. Addendum No. 13 was issued February 9, 2009, relating to adoption of amendments to the General Policy Plan as part of Final Docket XIII, Batch 2.
8.c.i.	The SEIS analyzes the Proposed Action, which is the potential change to the FLUM designation and implementing rezone. The decision related to the docket criteria had already occurred through the County's docketing process, as outlined in Section 2.1.2 of the SEIS.
8.c.ii	The comment is noted. Please see response to Comment 8.c.i. of this letter.
8.d.i.	The comment is noted. CPPs UG-5 and UG-6 are substantially covered in LU policy 3.A.2. Draft SEIS Section 3.14.4 has been amended to include a mitigation measure that proposes to address at a programmatic level the issue of transit, pedestrian and bicycle accessibility and connectivity.
8.e.i.	Woodway's Land Use Goals LUG-9 and LUG-10 call for the town to work with appropriate jurisdictions to collectively implement the land use plan for Point Wells and to prepare development regulations that will implement the plan. Draft SEIS page 3.14-14 suggests a mitigation measure to achieve consistency with Woodway's LUG-10. According to Comment Letter 7, the Paramount property owner apprised the Woodway's Council of development plans over 2 years ago, although not at the density analyzed in this SEIS. Please see response to Letter 7, Comments 2 and 7.
8.e.ii.	Draft SEIS page 3.14-14 suggests a mitigation measure to achieve consistency with Woodway's LUP-18. Also, please see response to Comment 8.e.i. of this letter.
8.e.iii.	Draft SEIS page 3.14-14 suggests a mitigation measure to achieve consistency with Woodway's LUP-19. Also, please see response to Comment 8.e.i. of this letter.
8.f.	Shoreline's transportation goals and policies direct the city to coordinate and work with its neighbors, regional partners,

Comment Number	Response
	and Sound Transit to implement its transportation system and study a commuter rail stop in Richmond Beach/Point Wells; to develop interlocal agreements with neighboring jurisdictions; and to pursue methods of reducing impacts on Richmond Beach Drive and King/Snohomish County line. Draft SEIS pages 3.14-14 and 15 include a mitigation measure to achieve consistency with Shoreline's goals and policies.
9.a.	<p>WAC 197-11-060(3)(b) states that proposals are closely related and shall be discussed in the same environmental document if they: 1) cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or 2) are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation. In this case, the proposed designation of the Point Wells site could proceed, but would result in an internal inconsistency in the County's GPP. The policies are reviewed and discussed as possible mitigation in this SEIS.</p> <p>Impacts of other proposals included in Docket XIII were analyzed in Addendum 11 (GPP7, SW7, SW45, Brookside Village, and NPDES); in Addendum 12 (GPP2 Cathcart); Addendum 13 (GPP16 FCC, GPP17 Rural Population Allocation, GPP18 Rural Cluster Subdivisions, and Urban Centers); Addendum 14 (Forest Transition Area Overlay); Addendum 15 (FCC stakeholder GPP policy amendments, FCC stakeholder Code amendments); and a Draft SEIS for SW UGA infill proposals SW39, SW42, and SW46.</p>
9.b.	The comment is noted. Please also see response to Comment 9.a. of this letter.
10.a.	The No Action Alternative and Proposed Action bracket the range of possible land use designation options and allow a conservative analysis of potential impacts. Analysis of a higher density alternative does not preclude adoption of a less dense action. A marina was not part of the proposal and was not analyzed. Please also see response to Letter 2, Comment 2.
10.b.	The comment is noted. Please also see response to Comments 10.a. of this letter and Letter 2, Comment 2.
11.	A Transit/Pedestrian Village has not been proposed as part of this Urban Center. If, at a future date, the County decides to designate a Transit/Pedestrian Village as part of the Urban Center, it would be subject to policy, environmental, and regulatory review at that time.
12.	The locations of pedestrian and bicycle facilities in the surrounding areas are listed in the Draft SEIS pages 3.11-16 and 3.11-17. It is expected that the implementation of the Proposed Action will support the need to coordinate with surrounding jurisdictions to enhance the connectivity. One of the mitigation strategies identified in the transportation section involves upgrading the northern part of Richmond Beach Drive to urban collector road standards with the creation of a separate pedestrian path. Also, please see response to Comment 8.d.i. of this letter.
13.	The comment is noted. Amendments to the Comprehensive Plan may be made annually through the docketing process; they do not need to wait for a major update. At the time of a development application for a mixed use development, the County may require bicycle and pedestrian connections for adjacent properties under county jurisdiction to provide the type of interconnectivity Policies LU 3.H.1 and LU 3.H.2 encourage and require. Also, please see response to Comment 8.d.i. of this letter.
14.	The Proposed Action is consistent with HO 1.B and HO 1.B.4 as it would allow mixed-use development providing high-density housing. Additional high-density housing would offer additional housing options. GPP Goal LU 3 states: Establish compact, clearly defined mixed-use centers that promote a neighborhood identification and Objective LU 3.A states: Plan for Urban Centers within unincorporated UGAs consistent with Vision 2020 and the CPPs.
15.	Housing Objective HO 2.B relates to LU Policy 3.A.2., which calls for high-quality urban design. The Proposed Action is consistent with HO 2.B.2, which says the County shall facilitate the development of urban centers in appropriate locations within UGAs.
16.	The comment is noted. Please see response to Comment 8.b.i. of this letter. All of the transportation policies noted by the commenter have been added to Draft SEIS Chapter 3.14.3 along with consistency analyses and mitigation measures, if warranted. Based on the existing Comprehensive Plan Transportation Element, SCC 30.66B (Concurrency and Road Impact Mitigation) and the Urban Center requirements for multi-modal transportation access, the Proposed Action is consistent with the transportation policies. See Chapter 3 of this Final SEIS.

Letter #16: Richmond Beach Community Association

Comment Number	Response
1.	The comment is noted. The Richmond Beach Community Association is a party of record.
2.	The comment is noted. The Draft SEIS was issued and available on the County's website on February 6, 2009, pursuant to SEPA Rules (WAC 197-11-455).
3.	Please see Draft SEIS page 3.11-37 for a discussion of impacts on Richmond Beach Drive and Chapter 3 of this Final SEIS for additional information and corrections. Please also see responses to Letters 3 and 5.
4.	The current use of the site is allowed in the County's Heavy Industrial zone and the owner may expand that use as long as further industrial development meets the County's bulk regulations (coverage of site, setbacks, building height and similar regulations). There would be no restriction on the amount of traffic coming from an existing, already permitted use. The site owner must continue to meet Ecology regulations and permitting that monitor contamination on the site.
5.	The comment is noted. Please also see Letter 7, Comment 2.
6.	The comment is noted.
7.	The comment is noted.
8.	The comment is noted. Please also see responses to Letter 4 and Letter 6.
9.	The comment is noted.
Letter #17: Whitney Storm	
1.	The comment is noted. Please see Letter 7, Comment 2 regarding the number of units. The development of a marina was not considered in this SEIS. Please see response to Letter 2, Comment 2. Also, please refer to Draft SEIS Chapter 3.9 for a discussion of the impacts of light and glare under both the Proposed Action and No Action Alternative.
2.	The comment is noted.



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425/348-7100 ph
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Joyce Eleanor
Chief Executive Officer

Snohomish County Planning Commission
3000 Rockefeller, MS 604
Everett, WA 98201
c/o Planning Commission Clerk, Sally Evans

February 24, 2009

Re: Community Transit Comments on Proposed Docket XIII Amendments

Members of the Commission:

Community Transit appreciates the opportunity to respond to proposed plan amendments and policy revisions that affect transit services in Snohomish County. It is our goal to help ensure that new development is placed appropriately and designed to be compatible with public transportation.

Over the past year, Community Transit has engaged in a very productive collaboration with Snohomish County in planning and implementing a Transportation Demand Management strategy for 164th Street in the southwest urban growth area. Further, staff from both agencies enjoyed close coordination in working with Sound Transit to craft a supportable ST2 transportation proposal that would bring maximum transit benefit to Snohomish County. We continue to work with the County on multi-modal transportation studies, location of transit facilities and long-range transit planning. In short, Snohomish County understands the need to develop transit oriented communities that will maintain long-term mobility for everyone, maximize infrastructure effectiveness and minimize environmental and climatic impacts.

In the spirit of our shared goal for development of "think transit first" communities, we offer the following comments on proposals contained in Docket XIII.

Fully Contained Communities (FCC)

We applaud the recommendation to eliminate policies related to Fully Contained Communities. Prioritizing transit and pedestrian-oriented development in growth centers within existing urban growth areas (UGAs) focuses growth where it can be most effectively served by transit. While it is true that allowing for innovative design and a comprehensive mix of land uses at a single site provides support for the needs of residents living there and reduces the need for additional trips, urban communities created outside of existing UGAs place tremendous pressure on the efficient use of limited transit funds. Directing future growth into existing UGAs will bolster strategies that allow transit services to successfully compete with private autos' speed and reliability.

Rural Population Allocation, Rural Cluster Subdivisions (RCS), Purchase of Development Rights (PDR)

Community Transit supports these amendments and policy changes which are key components of implementing the regional strategy for growth as described in VISION 2040. Reducing population growth in outlying areas and preserving farmland by purchasing the "development rights" of a property from landowners helps maintain the quality of life many find desirable in Snohomish County. Community Transit encourages the County to consider our Transit Emphasis Corridors (identified in our Transit Development Plan and Long Range Transit Plan) as receiving areas for transferred development rights. Again, reducing growth in rural areas and directing it toward urban areas helps to make the most of limited transit resources and stems the growth of traffic from places outside of UGAs.

Cathcart Area

4

Located near the intersection of two designated transit corridors, SR 9 and Cathcart Way, Community Transit shares the County's vision to develop the Cathcart site into a sustainable, compact and connected, transit-oriented mixed-use neighborhood. Community Transit is working at multiple levels with the County to assure that the master plan for Cathcart will accommodate appropriate transit services and facilities. The process underway at Cathcart can serve as a model for transit/land use integration and demonstrates the benefit of involving key stakeholders, such as public transit, in the earliest stages of community development.

Paramount of Washington, LLC

5

Community Transit has concerns regarding the proposal to designate the Point Wells site as an urban center. Whereas other existing and proposed urban centers such as Ash Way and Cathcart are situated on major existing or planned transit emphasis corridors with excellent infrastructure and regional connectivity, the Point Wells site is isolated from the remainder of Snohomish County. The proposal acknowledges the challenges associated with roadway access from Snohomish County and highlights the only viable access on Richmond Beach Road from King County. With little prospect of significant future bus transit to the site, the proposal for urban center status is tied to the Sounder commuter rail line travelling through Point Wells.

Conversation with Sound Transit indicates they have no current or future plans to construct a station at Point Wells and this possibility is not raised in their Long Range Plan. Further, passenger rail service on this corridor is peak-period/peak-direction only, oriented to the Seattle commuter market. An urban center requires the all-day bi-directional connectivity provided by proximity to a true HCT transit corridor. The base Urban Center/High Capacity Transit nexus is not established under this proposal.

Urban Centers

6


Community Transit has been a committed partner in supporting the Urban Centers Demonstration Program since its inception. We strongly support continuation of this program and will move forward with Snohomish County in planning and developing transit-oriented centers such as Ash Way/Newberry Square and the Cathcart site. We are particularly pleased with the policy direction in this section that expands transit pedestrian village (TPV) beyond urban centers to station sites in HCT corridors. It is our hope that *Swift* BRT stations will become a focal point for pedestrian oriented development fostering growth of "think transit first" communities.

7

At the same time, we have concerns over the proposed amendment to add Point Wells to the list of urban centers and enable future urban center designation based only on the presence of a commuter rail line. As stated above, it is our belief that the urban center designation implies the consistent, all-day availability of the transit option (or plans for such service) and a corresponding level of connectivity to surrounding communities. Commuter rail, on its own, does not provide this level of service or connectivity. We encourage further discussion of this proposal and its implications for development at Point Wells and throughout unincorporated Snohomish County.

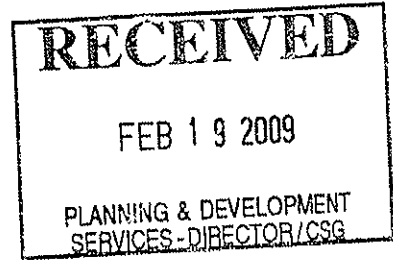
As stated earlier, there is much in Docket XIII that has the potential to promote growth and development of transit-compatible communities. Community Transit looks forward to continued collaboration with Snohomish County on coordinated transportation and land use planning.

Sincerely,



Roland Behee
Supervisor of Strategic Planning
Community Transit
Roland.behee@commtrans.org
(425) 348-2368

February 13, 2009



Craig R. Ladiser, Director
Snohomish County
Planning and Development Services
3000 Rockefeller Avenue - M/S #604
Everett, WA 98201-4046

RE: Draft Supplemental Environmental Impact Statement for the Final Docket
XIII Comprehensive Plan Amendment

Dear Mr. Ladiser:

The Port of Edmonds is aware that Snohomish County is proposing amendments to its adopted Comprehensive Plan and submitted a letter to you dated November 28, 2007 on the Scope of the EIS. We are still interested in the Paramount of Washington, LLC Proposal to rezone 65.9 acres, including tidelands, from the current zoning of Urban Industrial to the Urban Center designation. The subject property is located within the Edmonds Port District and in the Town of Woodway's Urban Growth Area.

1

Washington State Law established port districts for the purpose of economic development. Marinas are significant aesthetic and recreational amenities and are also important economic development drivers. Both the Port of Edmonds Master Plan and the Woodway Comprehensive Plan include language that addresses the concept of a marina as one of the potential uses at the Point Wells location. This critical waterfront site must be developed with great care and sensitivity. To do anything less is to squander a precious resource.

The Port of Edmonds Master Plan, adopted on June 27, 2005, states that, "the Master Plan vision, when fully implemented, will realize the following: The Port's in-water marina is currently filled to capacity. There could be opportunities for marina expansion in concert with the Edmonds Crossing Project or through partnerships with the Town of Woodway and the owner of the Point Wells property."

2

The Town of Woodway's Comprehensive Plan includes the concept of a marina in at least two sections of the document. In the Point Wells Subarea Plan policies,

2
cont.

LUP-21 states that, "The industrial designation for the waterfront area is projected to be the most appropriate land use for the near-term..." It goes on to say that, "The Town may consider amending the industrial designation at such time that environmental, capital facilities and geo-political conditions warrant a more intensive use of the waterfront area which may include a potential marina." Appendices to Woodway's plan include Future elements of Point Wells that should contribute to a "sense of place". These elements were developed through a community survey. Among the elements is an "Appropriately scaled marina with sailboats and power boats."

3

We are still concerned that marinas are not listed as a permitted use in the Snohomish County Code. However, we are also aware that just because a use is not specifically listed, it is not necessarily prohibited. In the case of a marina, we understand that it may be considered under the category of "recreational uses not otherwise noted."

If the Port of Edmonds can be assured that this category of use would be permitted within an Urban Center and that the County is not taking any action that would preclude the inclusion of a marina at this site, our concerns would be diminished. It is important that the County recognize the economic, recreational and even environmental benefits that come from the development and ongoing operation of marinas.

4

Thank you for the opportunity to express our concerns. As you know, land use regulations that are adopted for future development have a profound and lasting impact on what actual development is undertaken. We believe that the waterfront portion of the property which is the subject of the Paramount of Washington evaluation is a unique resource that merits very careful review. We appreciate your attention to this issue as you proceed with review and revisions to the Snohomish County Comprehensive Plan. Please feel free to contact me if you have any questions.

Sincerely yours,



Christopher W. Keuss CMM
Executive Director

cc: Steve Skorney, Senior Planner, Snohomish County PDS
Carla Nichols, Mayor, Town of Woodway
Steven Farkas, VP and General Counsel, Paramount Petroleum
Steven Ohlenkamp
Brad Cattle, Port Attorney
Port Commission



Planning Commission Exhibit # 35
File Docket XIII, Batch 2

February 24, 2009

Snohomish County Planning Commission
3000 Rockefeller Ave. M/S 604
Everett, WA 98201-4046

The City of Shoreline appreciates the opportunity to comment on the proposal and Draft SEIS for the Comprehensive Plan Amendment: Docket XIII, SW 41, the Paramount (Point Wells) Amendment.

Our comments will address the proposal and include initial comments on the DSEIS. We intend to submit a more complete set of comments on the DSEIS prior to the comment deadline of March 23, 2009.

General Comments

This has the potential to be a very large redevelopment project with most of the impacts accruing to Shoreline and its residents

The proposal would permit development of up to 3500 dwelling units and up to 85,000 square feet of retail and commercial space. Perhaps this is not large by County standards, but by Shoreline's standards (a city of 20,000 residences and 52,000 people) it is sizable.

1 Most of the major impacts of development on the Point Wells site will be on the City of Shoreline due to proximity and access—the site is immediately adjacent to our boundaries and the only vehicular access to and from the site for connections to the major transportation network (SR 99 and I-405) is on Shoreline streets. In terms of residential development, 3500 residential units equates to more than 15% of Shoreline's existing housing stock. These residents will use the one road that connects Point Wells to the main arterials and impact Shoreline residents as they are doing so. The City of Shoreline has a profound interest in making sure that the impacts of development of this site are adequately analyzed and described as the basis for determining appropriate mitigation measures.

▲ Comments on the process

Don't rush to judgment in making your recommendation – Bear in mind that the Commission has only been presented with part of the story

2

It is our understanding that the Planning Commission intends to make a recommendation prior to the issuance of the Final SEIS, and perhaps even before the Draft SEIS comment period ends. We urge you not to be too hasty in your decision. The current environmental document is incomplete without comment and an opportunity to review a response.

The reason for requiring an EIS process is to identify and disclose probable impacts. We strongly recommend that you wait for the Final EIS to be issued to make sure that you are considering all the facts prior to making a recommendation.

▲ Comment on the proposal

This location does not meet the County's criteria for an Urban Center designation

We believe that the staff conclusion is incorrect that the Point Wells project described in the request would meet the definition of an Urban Center. Snohomish County has defined Urban Centers as part of their Urban Centers Demonstration program. An Urban Center is defined as:

An area with a mix of high-density residential, office and retail development with public and community facilities and pedestrian connections located along designated high capacity routes or transit corridors. (Emphasis added)

3

We do not agree that the proposed designation is consistent with your criteria, specifically Policy 2.B.2., which states "The majority of new commercial development shall be accommodated as mixed use in urban centers, and/or urban village or adjacent to transit stations or designated transit corridors".

County staff concluded that this criterion is met because there are nearby transit and fixed rail lines. While it is correct to state that the site is adjacent to the commuter rail line, the important question is whether people at this location can take advantage of the proximity. The point of requiring proximity of commercial development to transit is to encourage people to access the site utilizing transit. While the site is adjacent to the line, it receives no service and the nearest station is located in Edmonds. Furthermore, the commuter rail station located at Richmond Beach is not part of Sound Transit's current 20 year plan.

Are there alternative transit modes available? High capacity routes are generally classified as bus rapid transit, commuter rail or light rail. The site is not served by any of these types of transit. The closest METRO stop is more than one-half mile away. If the site is developed, the tax dollars flow to Snohomish County, not King County METRO. It is difficult to conceive that, under these circumstances, METRO would serve the site.

Is there an indication that Snohomish County Transit would serve the site?

4 The other assumption in an Urban Centers designation is that an Urban Center would include a solid employment base. The SEIS assumes a base of 800 jobs, basing its assumption of 27 employees per acre on about 30 acres. We believe that a more correct way of estimating employment is assuming that employment is a function of the retail and commercial space that is provided. Even an optimistic assumption of 4 employees per thousand square feet, 85000 square feet would result in 340 jobs, about 40% of the job total that the EIS assumes.

5 Certainly the proposal would provide for a good deal of residential density. However, since it provides for relatively little employment and has little opportunity for mass transit, it seems to be an inappropriate location for an Urban Center designation.

Some amount of mixed use development is probably appropriate on the site. We recommend that it be at a lower density and intensity than allowed by an Urban Center designation – perhaps a combination of high density residential and community business designations might be more appropriate.

Comments on the EIS

There may be significant errors in the traffic analysis

6 Though we have had only two weeks to review the document, our staff believes that we have found errors in the traffic analysis. As we continue our review, we will be able to determine whether the errors are significant and how they would affect the mitigation analysis. At this time, our impression is that the study does not fully disclose the impacts to the City of Shoreline. In cases where impacts are identified, there does not appear to be a reasonable mitigation offered. Our staff will provide more detailed information as we review the study further. We look forward to working with County staff to address these discrepancies and identify additional mitigations that will be necessary to reduce impacts to an acceptable level.

Background Traffic Growth Estimates are High

7 It appears that one of the assumptions used to develop the future scenario uses a sustained traffic growth rate of approximately 2% (more or less), with some areas even higher than that. This may not be valid for a couple reasons. First is that the City of Shoreline is essentially "built-out", with development occurring on scattered lots throughout the city, or through sub-division of individual parcels, or demolition of existing structures. Second, the City of Shoreline has been experiencing negative traffic growth over the last 4 years. It is unlikely that there will be growth over the next few years, given the current economic state and outlook. Therefore to attain a growth rate that averages 2% will require significant growth in the later years, something that is not supported by our recent experience and our internal land use forecasts.

Traffic Safety Mitigations are not well analyzed or defined

8 In the area of traffic safety, the report mentions the intersection of 3rd Ave NW and NW Richmond Beach Rd along with the roadway segments of NW Richmond Beach Road

8
cont.

between 15th Ave NW and 12th Ave NW, and between 8th Ave NW and 3rd Ave NW as having some of the highest collision rates in the study area. However, there does not appear to be any discussion on the impacts of the development on safety, nor does the proposal offer mitigation to improve safety. The numbers are taken from the 2005 Shoreline TMP, so the statistics are based on data over 5 years old.

While our staff are still reviewing the details of the study, we can see that there will be considerable impact to Richmond Beach Dr NW. Current daily traffic volumes are 790 vpd, with 50am and 50pm peak hour trips. The study indicates that the am peak hour volume will increase to 1,085, and the pm peak hour to 1,310 vehicles.

9 *Transit does not serve the site and is not likely to serve the site*

The SEIS references the Community Transit and Metro routes located in the study area. However, as the SEIS correctly identifies, the nearest part of the project site is approximately ½ mile from the nearest transit route. Metro is the only transit provider this close to the site. Currently, Metro has two routes that provide service in the vicinity of the proposed project. One is an all day, local route that travels from Richmond Beach to the Northgate Transit center. The other route is a weekday, peak only route that travels from Richmond Beach to downtown Seattle. (The SEIS incorrectly identifies only one route in this area - the all day, local route.) While the proposed zoning may result in density sufficient to support transit, there are no assumptions made in the SEIS that transit service to the site will increase.

10

On a side note, there are reasons to believe that it would be unlikely that transit service would be extended to the site. Community Transit provides no service in the area and would travel through Shoreline to serve this site. Metro's service is overwhelmingly located within King County, with only three routes that cross very slightly into Snohomish County. The development may be able to fund some service extensions, but there is no description of how this will be accomplished or any indication as to timeframe. Over the past few years, King County has trended toward removing their service in Snohomish County. As an agency that is primarily supported by King County tax dollars and facing significant budget constraints, it is highly unlikely that Metro would extend any routes to serve Snohomish County simply because there is a large population concentration nearby.

11

The SEIS correctly identifies that commuter rail service passes by the site but does not serve it directly. It also correctly assumes that construction of a new commuter rail station at this location is unreasonable, as Sound Transit has no plans for locating a station at this site in their current 20 year plan.

Park Issues not Described in Detail

12

The DEIS does not address park issues in any detail. The EIS does not analyze or define the amount or type of park facilities that are necessary to adequately serve a population of 6400 residents.

The DEIS references the closest County park as Esperance Park, located 2.75 miles northeast of the site. That may be true as the crow flies, but to get to Esperance Park from Point Wells you must drive through Shoreline and a total of nearly 6 miles to get to Esperance Park. People from Point Wells won't be able to get to a Snohomish County park without having an impact on Shoreline.

Rather than drive that distance, it is more likely that Point Wells residents will use the closest park. The closest park system for future residents of Point Wells will be the City of Shoreline system. The additional use of our park system by over 6,400 Point Wells residents will increase activity, wear and tear, and utility costs in our system.

12
cont.

The DEIS under Significant Unavoidable Adverse Impacts states "with mitigation, no significant unavoidable adverse impacts on parks are anticipated". We strongly disagree with such a statement without the EIS providing even a cursory discussion on the types of facilities that will be included in the project. Conservatively, one could estimate that 10% of the population of Point Wells will be children. This would translate to 640 children. How will the active/ passive needs of Point Wells residents be met? Will there be baseball fields, softball fields, soccer fields, tennis courts, trails, picnic shelters, etc.?

Although parks are mentioned in very generic terms in the DEIS there is no mention of recreation programming. There will be increased use of Shoreline recreation activities, indoor recreation facilities (Shoreline pool, Spartan Recreation Center, The Rec.) and the Shoreline Senior Center. This increased use needs to be evaluated and should be addressed in the final EIS.

13

We suggest the City of Shoreline staff and Parks, Recreation, and Cultural Services Board be consulted before any addition reports are created regarding the development of parks and recreation facilities at Point Wells. Shoreline staff would be glad to meet with the Snohomish County Parks and Recreation staff to participate in this discussion.

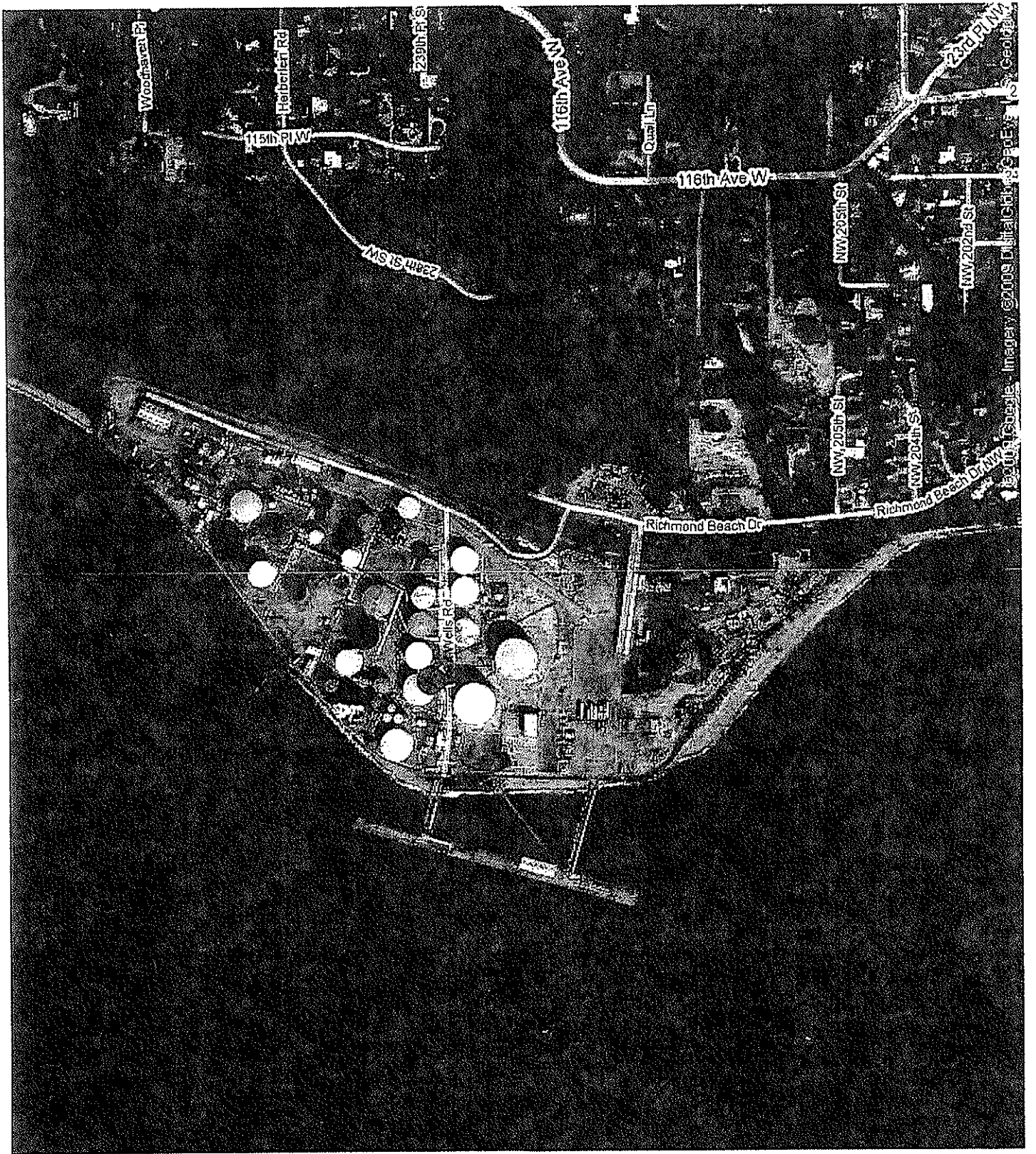
There are many other assumptions and conclusions stated in the DSEIS that we will comment on prior to the March 23 deadline. We urge you to delay action on a recommendation until you have access to all the facts in the Final SEIS.

Thank you for your consideration.

Sincerely,



Steven M. Cohn
Senior Planner
City of Shoreline
206-801-2511





SHORELINE
CITY COUNCIL

Cindy Ryu
Mayor

Terry Scott
Deputy Mayor

Chris Eggen

Ron Hansen

Doris McConnell

Keith McGlashan

Janet Way

March 11, 2009

Mr. Craig R. Ladiser, Director
Snohomish County Planning and Development Services
M/S # 604
3000 Rockefeller Avenue, Everett, WA 98021-4201.

RECEIVED

MAR 23 2009

PLANNING & DEVELOPMENT
SERVICES

RE: Comprehensive Plan Amendment and Rezone
Draft SEIS
Point Wells Property, Docket XIII

Dear Mr. Ladiser:



Snohomish County is currently considering a Comprehensive Plan Amendment and rezone request that would change the current land use designation at Point Wells from Urban Industrial to Mixed Use/Urban Center and the current zoning from Heavy Industrial to Planned Community Business. As indicated in the Draft Supplemental Environmental Impact Statement, Final Docket XIII, Comprehensive Plan Amendment, Paramount of Washington LLC (draft SEIS), adopting these land use changes could result in a population of up to 6440 residents and 85,000 square feet of commercial and retail space. The City of Shoreline Police Department has been providing first response police services to the Point Wells Chevron (now Paramount) Plant and property located in unincorporated Snohomish County under the terms of a Memorandum of Understanding since January of 2001. The MOU indicates that this agreement is necessary due to lengthy response times from Snohomish County that are detrimental to public safety. The City of Shoreline has been pleased to provide this service as a good neighbor and in the interests of public safety. However, this MOU was based upon the low call volume and severity of calls generated by the current use of the property as an asphalt receiving, storage, and distribution facility. An important term of the agreement is that it may be cancelled by either party with 7 days notice. If the proposed Comprehensive Plan and land uses changes are adopted by Snohomish County the City of Shoreline will cancel the agreement for police services and no longer provide first response police services to the Point Wells area.

Due to the geographic isolation and extremely limited access of Point Wells from the rest of unincorporated Snohomish County there would be no practical means for the Snohomish County Sheriff's Department to provide adequate police services to the over 6,000 residents, visitors, and businesses in this proposed development. The only road access currently or potentially available to Point Wells is through Shoreline along Richmond Beach Road. The City currently has 37 uniformed patrol officers and supervisors providing service from the nearby Shoreline Police Station and two neighborhood "store fronts" including one in Richmond Beach, a mile away from Point

2
cont.

Wells. There are no current residents at Point Wells and the area is entirely surrounded by incorporated cities. There are no nearby areas of unincorporated Snohomish County patrolled on a regular basis by the Snohomish County Sheriff's Office that could provide any reasonable response time for emergencies, or even routine non emergency service. There are at least 15 signalized intersections between Point Wells and the nearest SCSO facility, located in Mill Creek, over 13 miles away. Snohomish County emergency response times, under the best of circumstances with light traffic, would conservatively be at least 15 minutes (per MSN maps). Nationally recognized best police practice for Priority X calls (critical dispatches where incidents pose an obvious danger to the life of a citizen or officer) is less than 5 minutes. Priority 1 calls (those requiring immediate police action) are designated as less than 12 minutes. By way of contrast and example the Shoreline Police Department averages 3.31 minutes for Priority X, 6.8 minutes for Priority 1, and 10.78 minutes for Priority 2 calls. In addition 911 and dispatch services to Point Wells are provided through the King County Communications Center.

While Snohomish County provides excellent and professional police services, resources from the SCSO are simply located too far away to provide the necessary emergency and routine police protection required for a mixed use urban center. It is not feasible to station a police unit 24 hours a day, seven days a week in this relatively small and isolated pocket of unincorporated Snohomish County. This leaves no viable options to provide essential police services to this proposed development. One of the most fundamental duties and responsibilities of a local government is to provide basic life safety, police, fire, and emergency medical services for our residents, children, visitors and businesses. The draft SEIS fails to address how these essential public safety police services will be provided. It simply indicates that "... the developer must coordinate with the County Sheriff's Office to determine the necessary additional officers and patrols for the area". To approve a dense urban development for over 6,000 residents without adequate police services would be a serious breach of local government duty to public safety.

Since the draft SEIS fails to answer how critical police services will be provided, approval of this application would be a direct violation of the Growth Management Act which provides (RCW 36.70A.020) that: ***"(1) Urban Growth. Encourage development in urban areas where adequate public facilities or services exist or can be provided in an efficient manner."*** There are a number of other State and Snohomish County policies that prohibit dense urban development without the provision of adequate public services, such as:

3

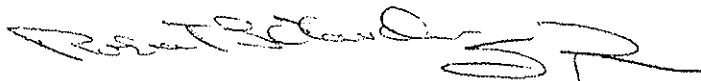
- *Snohomish County General Policy Plan, Land Use Policy 3.a.6:* Desired growth in Urban Centers shall be accomplished through...provision of necessary services and public facilities including transit, sewer, water, stormwater, roads, and pedestrian improvements.
- *Snohomish County General Policy Plan Goal CF 9:* Coordinate with non-county facility providers such as cities and special purpose districts to support the future land use pattern indicated by this plan
- *Snohomish Countywide Planning Policy UG-1:* Establish Urban Growth Areas which ...(c) can be supported by an urban level of service consistent with capital facilities plans for public facilities and utilities;

3
cont.

- *Snohomish Countywide Planning Policy OD-1*: Promote development within urban growth areas in order to use land efficiently, add certainty to capital facilities planning, and allow timely and coordinated extension of urban services and utilities for new development.
Identify 6-year growth areas geographically within each UGA or establish policies which direct growth consistent with the land use and capital facilities element to meet state law. In particular RCW 36.70A.110 (3) states that “urban growth should be located first in areas already characterized by urban growth that have existing public facility and service capacities to serve such development, and second in areas already characterized by growth that will be served by a combination of both existing facilities and services and any additional needed public facilities and services that are provided by either public or private sources. Further it is appropriate that urban government services be provided by cities...
- *Snohomish Countywide Planning Policy OD-2 b*: Allow development within the incorporated and unincorporated portions of the UGA as follows: The county will regulate development within the unincorporated portions of urban growth areas in a manner that does not preclude urban densities... Strategies will consider the unique development opportunities and constraints in each urban growth area and could range from development limitations in one area to the authorization of development at planned urban densities in those areas that have urban governmental services and capital facilities available.

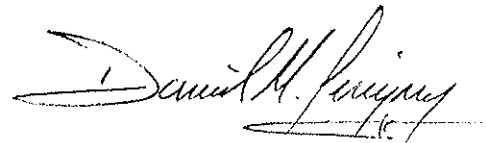
As indicated in the above listed policies, increased development densities must provide a corresponding urban level of service. Since the provision of these critical police services cannot be provided by Snohomish County or other agencies in Snohomish County to this location, we strongly recommend that the requested amendments to create an urban center at Point Wells be denied.

Sincerely,



Robert L. Olander
City Manager

Sue Rahr
King County Sheriff



Dan Pingrey
Shoreline Police Chief

cc: Shoreline City Council



March 23, 2009

RECEIVED

MAR 23 2009

Mr. Steve Skorney
Snohomish County Planning and Development Services M/S #604
3000 Rockefeller Ave
Everett, WA 98201-4201

PLANNING & DEVELOPMENT
SERVICES

Subject: Paramount Docket XIII DSEIS Comment

The City of Shoreline appreciates the opportunity to comment on the DSEIS. This comment letter is a follow up to our comments presented at the February 25 Planning Commission hearing orally and in writing; those comments are incorporated into this letter by reference.

The City's comments in this letter will focus solely on the contents of the DSEIS issued on February 6, 2009. It will not focus on the merits of the proposal. Our additional comments on the merits of the proposal will be offered prior to or at the County Council Public Hearing which has not yet been scheduled. Shoreline's DSEIS comments focus on three areas:

1. Transportation
2. Police and Fire Provision
3. Other Service Provision

Transportation

Transportation Model Assumptions Are Flawed

1. Model assigns too high a proportion of trips coming from and going to Snohomish County
 Figures 3.11-5 & 6 – the study assumes that 60% of all trips generated for Point Wells are related to Snohomish County, and only 40% for King County, including Seattle. Of these, perhaps 5% to the north and 5% to the south may be destined for the eastside. Given that the major population and employment center for the region lies to the south of Point Wells, it appears that the trip distribution assumption should be more 50%-50%, or even 40%-60% instead. By designating only 40% of the trips to the south, the model does not adequately address impacts in King County and the City of Shoreline.

2. Assumption about Background Traffic Growth is High

It appears that one of the assumptions used to develop the future scenario uses a sustained background traffic growth rate of approximately 1.5%, with some areas even higher. This may not be valid for a couple reasons. First, the City of Shoreline is essentially "built-out", with development occurring either on scattered lots throughout the city, through sub-division of individual parcels, or demolition of existing structures. Second, the City of Shoreline has been experiencing a decline in traffic volumes over the last 4 years (2004 to 2008) in the range of -6%. While there may be some years of positive traffic growth, it is unlikely that there will be sustained growth for 18 years, especially given the current economic outlook.

The impact of the lower traffic growth is very important in understanding the significances of the Point Wells development. With little traffic growth, the need for some of the future capacity and safety projects is focused not on background growth but rather the redevelopment of Point Wells itself as the major trigger.

Perhaps stated differently, the DSEIS traffic modeling overstates the background growth, thereby diluting the true impact of the proposed development as the traffic disperses through the network of streets. Therefore, the mitigation for the development is likely to be understated.

3. Assumption about future Bus Service are optimistic

The DSEIS references the Community Transit and Metro routes located in the study area. However, as the DSEIS correctly identifies, the nearest part of the project site is approximately ½ mile from the nearest transit route. Metro is the only transit provider this close to the site. Currently, Metro has two routes that provide service in the vicinity of the proposed project. One is an all day, local route that travels from Richmond Beach to the Northgate Transit center. The other route is a weekday, peak only route that travels from Richmond Beach to downtown Seattle. (The DSEIS incorrectly identifies only one route in this area – the all day, local route.) While the proposed zoning may result in density sufficient to support transit, there are no assumptions made in the DSEIS that transit service to the site will increase.

On a side note, there are reasons to believe that it is unlikely that transit service would be extended to the site. Community Transit provides no service in the area and would not travel through Shoreline to serve this site. Metro's service is overwhelmingly located within King County, with only three routes that cross very slightly into Snohomish County. The development may be able to fund some service extensions but, there is no description of how this will be accomplished and for how long. Over the past few years, King County has trended toward removing their service in Snohomish County. As an agency that is primarily supported by King County tax dollars and facing significant budget constraints, it is highly unlikely that Metro would extend any routes to serve Snohomish County, solely because there is a large population concentration nearby.

4. Model assumes a greater dispersion of traffic onto local streets than is likely to occur

Appendix C lists the existing and assumed future traffic volumes assigned to each turning movement at study intersections. It appears that the model assumptions allocate too many trips onto local streets and collectors instead of using the minor and principal arterials. For example, in following the eastbound PM trips from Point Wells, 87% of the traffic disbursts off of NW Richmond Beach Rd before Fremont Ave N. The traffic modeling in the DSEIS assumes that only 13% of the trips make it to SR99, where 4% turn north, 2% turn south, and 9% continuing east. SR 99 is a state highway and a principal arterial and a significant north/south connector. Our modeling shows and staff concurs that a more reasonable assumption is that a much higher percentage of trips, perhaps 60%, will reach SR 99 and use it to travel both north and south and to make connections to I-5. This may trigger a need for additional roadway improvements that is not recognized in the modeling done for the DSEIS.

5. Planned transportation improvements in King County are not included in the model; staff is unsure of the effect on the model if these improvements were to be included.

Appendix E – The travel demand forecasting report lists the highway improvement projects in the pipeline for 2015 and 2025. However, only Snohomish county projects are listed, most with little to no significance to the Point Wells proposal. Absent are any projects in King County, especially those that are significant to the DSEIS, such as the Aurora Corridor Improvement Project, phases II and III.

6. Zonal analysis of traffic flow south of Richmond Beach Road is lacking, leading to less accuracy in traffic forecast

Appendix E, Figure 2 shows the zones used to develop the model. The main corridor for access to the site is NW Richmond Beach Road in Shoreline. There were a number of new split zones created north of NW Richmond Beach Rd to help improve the accuracy of the forecasting model. However, there was only one split created to the south. If splitting up the zones improves the accuracy of the model, then the lack of this attention in the region of the most impact brings into question the accuracy of the forecast in the area.

Traffic Safety is not adequately addressed

7. In the area of traffic safety, the report mentions the intersection of 3rd Ave NW and NW Richmond Beach Rd along with the roadway segments of NW Richmond Beach Road between 15th Ave NW and 12th Ave NW, and between 8th Ave NW and 3rd Ave NW as having some of the highest collision rates in the study area. However, there does not appear to be any discussion on the impacts of the development on safety nor offer mitigation to improve safety. A significant increase in volumes associated with the Point Wells development may decrease safety and increase congestion in the corridor, and specifically at 3rd Ave NW and NW Richmond Beach Rd. It is likely that more projects to improve safety and traffic flow will be required in addition to those listed in the study

Conclusion

8 The DSEIS does a reasonable job considering the Snohomish County impacts, but does not achieve a thorough analysis of the impacts and mitigation needed along the only access route, primarily through the City of Shoreline. Considering that the effect of some of the assumptions in the traffic model that understate the vehicle trips along the roadway system in the City of Shoreline, it is our staff conclusion that full development of the Point Wells site will result in greater impacts than discussed in the study. Corrections to the present and future conditions need to be made to improve confidence in the model output and conclusions.

With current information, it is difficult to estimate the true impacts of increased traffic on Shoreline's streets with the information in the DSEIS.

9 Staff's initial analysis suggests that the impacts of a development of 3500 units on Shoreline's streets would result in impacts that will be impossible to mitigate.

There will be considerable impact to Richmond Beach Dr NW. Current daily traffic volumes are 790 vpd, with 50am and 50pm peak hour trips. The study indicates that the am peak hour volume will increase to 1,085, and the pm peak hour to 1,310 vehicles. Given the narrow, winding geometry of this roadway, it may not be able to handle this traffic without considerable congestion and delay.

This leads to the following conclusions:

- 9a • Development of this area will need to be significantly scaled back for the concepts identified in the DSEIS.
- 9b • Traffic model should be modified to address its failings, especially related to trip distribution, and to the background traffic assumptions. The model needs to be re-run to account for these unrealistic assumptions. The analysis should identify unavoidable significant impacts if the property is developed at the levels assumed in the DSEIS, and if impacts can be mitigated to an acceptable level and an acceptable cost, identification of mitigations, their cost, and who should be responsible for bearing the cost.
- 9c • If significant impacts cannot be mitigated or if the cost of mitigation is unreasonably high, alternative (less intense) growth scenarios should be identified and analyzed to learn if the reduced growth scenario can be adequately mitigated.
- 9d • When considering mitigation measures, traffic and pedestrian safety measures should be taken into account and costs defined.

Shoreline staff would be pleased to assist in reviewing assumptions and outputs of the traffic modeling to make sure that it reflects an accurate representation of reality.

Police and Fire Provision

10 The Point Wells properties owned by proponent Paramount of Washington, Inc. connects to the regional road network only via Richmond Beach Road in the City of Shoreline. Neither Snohomish County nor the Town of Woodway currently provide vehicular access, police, fire, or emergency medical services to the Paramount property, nor have they indicated their ability to provide such urban services or facilities in the future.

In DSEIS comment letters from Shoreline Fire Department (dated March 9, 2009) and King County Police (dated March 11, 2009), these departments clearly stated that they will not be providing service to Point Wells if it develops as an urban center and is not annexed to Shoreline. If these two entities do not provide service and the Point Wells site is redeveloped as a mixed use center, it is important to identify in the Final SEIS where Police and Fire services come from, and how long the response times will be. It is important to know this information to determine whether the response times should be considered to be significant adverse impacts.

We have enclosed a map of the closest County Police and Fire facilities and their approximate distance to Point Wells.

Other Service Provision

11 In addition to not providing police or fire protection to this area, neither Snohomish County nor the Town of Woodway current provide parks, code compliance, or sewer service to the Paramount property. These services are integral to a creating and maintaining a residential community. We request that the Final SEIS address these issues in some detail – for example, given the proximity of Snohomish County parkland and library facilities, where are they located and what is the likelihood that Point Wells residents would use Snohomish County facilities when Shoreline facilities are much closer?

Our staff is available to answer questions or assist with analysis. Please contact Steven Cohn at 206-801-2511 or scohn@shorelinewa.gov

Sincerely,





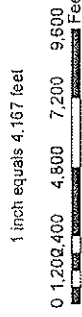
Joseph W. Tovar, FAICP
Director, Planning and Development Services

Attachment: Map of Police and Fire Stations

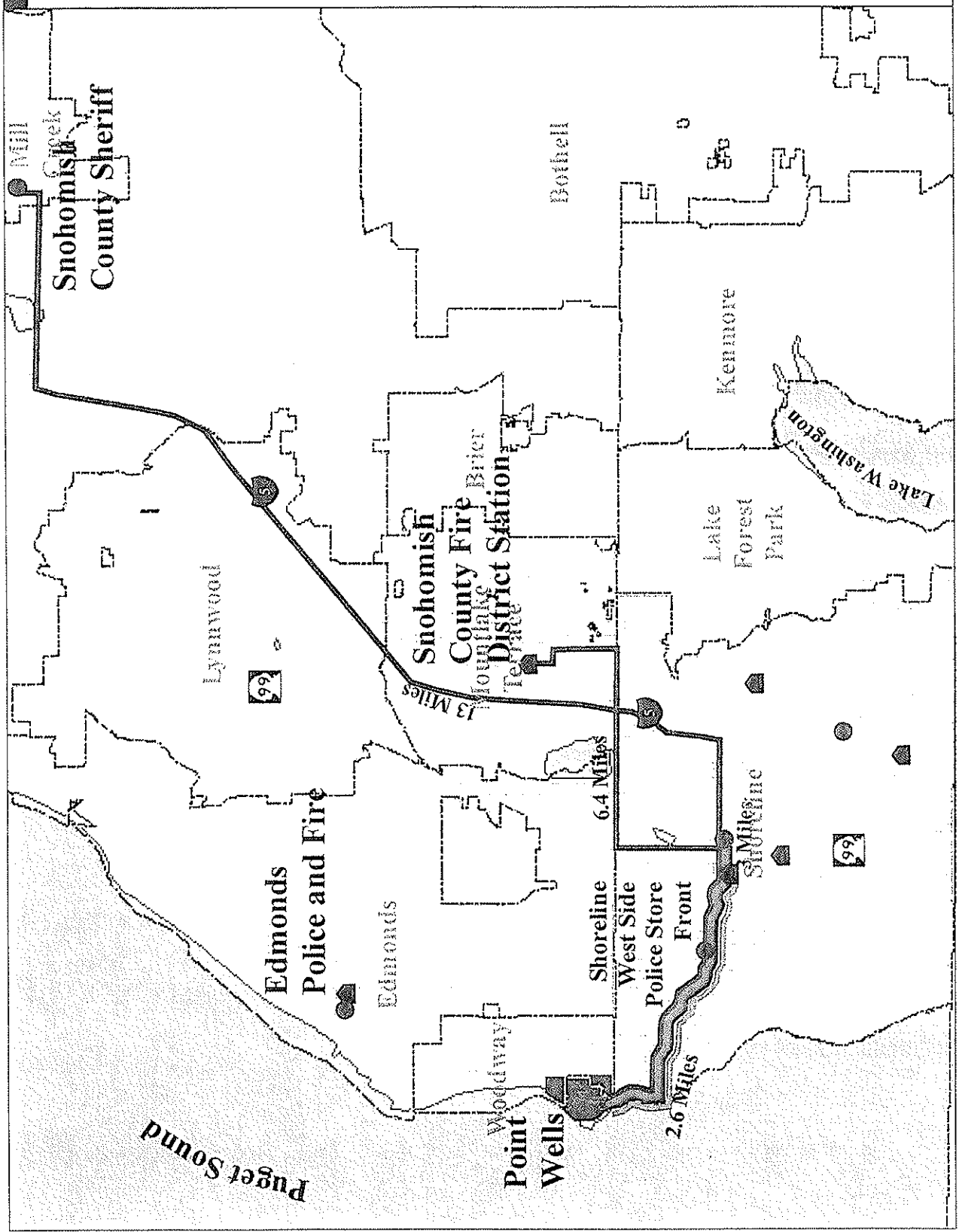
Fire and Police Stations Distance to Pt. Wells

Public Facility

-  Fire Department
-  Police
-  City
-  Point Wells



Notwithstanding to any set including accuracy, fitness, or merchantability, accompany this product.





Shoreline Fire Department

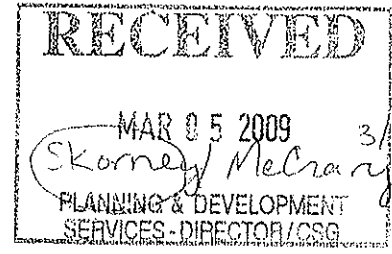
Dedicated to the Protection of Life and Property

Scott Keeny
Jon Kennison
Jim Fisher
Commissioners

Marcus Kragness
Fire Chief

March 2, 2009

Craig R. Ladiser, Director
Snohomish County Planning and Development Services
M/S #604
3000 Rockefeller Avenue
Everett, WA 98021-4201



RE: Comprehensive Plan Amendment and Rezone
Draft Supplemental Environmental Impact Statement
Point Wells Property, Docket XIII

Dear Mr. Ladiser:

Snohomish County is currently considering a Comprehensive Plan Amendment and rezone request that would change the current land use designation at Point Wells from Urban Industrial to Mixed Use/Urban Center and the current zoning from Heavy Industrial to Planned Community Business. As indicated in the Point Wells Draft SEIS, adopting these land use changes could result in a population of up to 6,440 residents and 85,000 square feet of commercial and retail space.

1

Although Point Wells is outside the boundaries of the Shoreline Fire Department, the Department has provided fire and emergency medical services to Point Wells through a service contract with the owner for over 30 years, since there are no other fire services available or nearby. Shoreline response to Point Wells is provided by the nearby Station 64, located approximately 2.25 miles from the site. The station is staffed with one lieutenant, four firefighter/emergency medical technicians, and two firefighter/paramedics. The station is equipped with one pumper engine, one basic life support vehicle, and one advanced life support vehicle. The staffing, equipment, and proximity to Point Wells has guaranteed an outstanding level of fire and emergency medical response to the Paramount site over the years. However, this service has been provided based on the current industrial use as an asphalt receiving and distribution facility. If the proposed Comprehensive Plan and land uses changes are adopted by Snohomish County, the Shoreline Fire Department will no longer provide first response fire and emergency medical services to the Point Wells area.

2

The Shoreline Fire Department (King County Fire District 4) is annexed to the City of Shoreline and therefore the City is the legal authority responsible for the adoption and enforcement of all building and fire codes. Over the years, the Department has worked closely with the City to ensure that we have adequate codes, enforcement and public education including but not limited to:

- Sprinkler Ordinances
- Fire flow, hydrant and storage requirements for new development

2
cont.

- Emergency access and turn around standards
- Hazardous material codes and inspection
- Building plans review
- Fire inspections
- Fire prevention standards and education
- Arson investigation protocols
- Emergency and disaster management plans, training, drills and procedures
- Combined Emergency Operations Center
- Communications interoperability with Shoreline Police, Public Works, and Community Response Team
- Traffic and fire scene control
- Public education and training for natural and man made disasters.

3

It is simply not practical, feasible or even advisable to recreate the duplicative legal, code and service provisions with Snohomish County that would be necessary for the Shoreline Fire Department to provide an adequate level of professional fire prevention, fire response and emergency medical service required by a highly developed Point Wells.

The draft SEIS does not adequately address how these crucial emergency services will be provided. In Section 3.12 the report simply indicates that the service should be provided by a Snohomish County rural fire district or the Shoreline Fire Department. The draft glaringly omits that there are no nearby rural fire districts that could possibly supply these services with any reasonable response times. This would leave the residents, visitors, and businesses at Point Wells with inadequate and seriously deficient fire and emergency medical services. It is well established that minutes and even seconds are crucial in quelling fires and providing life saving emergency medical services.

Due to the geographic isolation and extremely limited access to Point Wells from the rest of Snohomish County, there are no feasible and practical alternatives to provide critical fire and emergency medical services to the over 6,000 residents, businesses, and visitors projected for Point Wells. The response times to Point Wells from emergency responders in Snohomish County, under any reasonable professional standards or interpretation of the Growth Management Act, cannot be considered as "adequate public services or facilities" which could be "provided in an efficient manner." The Growth Management Act provides in part (RCW 36.70A.020): "(1) Urban Growth. Encourage development in urban areas where adequate public facilities or services exist or can be provided in an efficient manner." There are a number of other State and Snohomish County policies that prohibit dense urban development without the provision of adequate public services, such as:

4

- *Snohomish County General Policy Plan, Land Use Policy 3.a.6:* Desired growth in Urban Centers shall be accomplished through...provision of necessary services and public facilities including transit, sewer, water, storm water, roads, and pedestrian improvements.
- *Snohomish County General Policy Plan Goal CF 9:* Coordinate with non-county facility providers such as cities and special purpose districts to support the future land use pattern indicated by this plan.

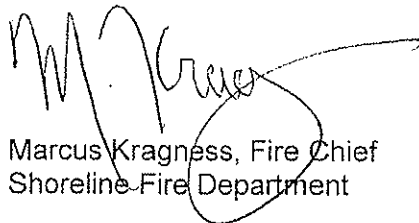
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- *Snohomish Countywide Planning Policy UG-1*: Establish Urban Growth Areas which ... (c) can be supported by an urban level of service consistent with capital facilities plans for public facilities and utilities;
- *Snohomish Countywide Planning Policy OD-1*: Promote development within urban growth areas in order to use land efficiently, add certainty to capital facilities planning, and allow timely and coordinated extension of urban services and utilities for new development.
- Identify 6-year growth areas geographically within each UGA or establish policies which direct growth consistent with the land use and capital facilities element to meet state law. In particular RCW 36.70A.110 (3) states that "urban growth should be located first in areas already characterized by urban growth that have existing public facility and service capacities to serve such development, and second in areas already characterized by growth that will be served by a combination of both existing facilities and services and any additional needed public facilities and services that are provided by either public or private sources. Further it is appropriate that urban government services be provided by cities...
- *Snohomish Countywide Planning Policy OD-2 b*: Allow development within the incorporated and unincorporated portions of the UGA as follows: The county will regulate development within the unincorporated portions of urban growth areas in a manner that does not preclude urban densities...Strategies will consider the unique development opportunities and constraints in each urban growth area and could range from development limitations in one area to the authorization of development at planned urban densities in those areas that have urban governmental services and capital facilities available.

5

Prompt and sufficient fire and life safety services are among the primary and vital duties of local governments, and planning for dramatically increased development intensities must take this into account. Since the provision of these critical life safety services cannot be provided to Point Wells by Snohomish County and cannot be reasonably provided by other agencies in Snohomish County, we strongly recommend that the requested amendment be denied.

Sincerely,



Marcus Kragness, Fire Chief
Shoreline Fire Department

cc: Robert Olander, City Manager
City of Shoreline



Planning Commission Exhibit # 31
File Docket XIII, Batch 2

February 24, 2009

Snohomish County Planning Commission
c/o Planning and Development Services Planning Commission Clerk
3000 Rockefeller, M/S 604
Everett, WA 98201

Dear Chairperson Hambleton and Commissioners,

1 Thank you for the opportunity to provide preliminary comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Paramount proposal at Point Wells. Given that Point Wells is surrounded on three sides by our corporate limits and is situated within our Municipal Urban Growth Area (MUGA), we are greatly concerned about the environmental impacts associated with the proposal to amend the County Comprehensive Plan to Urban Center.

As you may be aware, Woodway is an entirely residential community with a strong environmental ethic. What you may not know is that we have been engaged in planning for Point Wells for over eight years. Our current comprehensive plan recognizes that future development of Point Wells will need to be coordinated with Snohomish County to ensure that such development is well planned, well designed and impacts are successfully mitigated both to the natural environment and surrounding neighborhoods.

2 While comprehensive plans of the neighboring cities of Woodway and Shoreline contemplate a mixed-use development with urban densities at Pt. Wells, the level of density proposed here is completely inconsistent with the character of those neighboring communities. For the past two years, the property owner led my Council and me to believe that a 1,400 unit development was being considered. What we are discussing tonight is a considerable expansion and is not consistent with our current comprehensive plan. I want to be clear that we are not opposed to the general concept of redevelopment but the size and type of housing needs to be revised. Why not a development with fewer dwelling units that include a diversity of land uses? Why not commercial and a blend of residential densities (including medium multi-family and single family uses) plus public spaces? We believe such diversity would be consistent with existing countywide general plan policies.

3 The Town understands the programmatic nature of this DSEIS and that once a specific project is submitted, "phased review" will be required. While the DSEIS references this requirement numerous times, we echo that point. The County must require further environmental reviews so that local elected officials and their constituents can understand the actual project and the real impacts being considered.

4 Utilizing the Urban Centers Demonstration Program as the framework for planning and permitting of proposed development at Pt. Wells is confusing. On page 3.9-8 of the DSEIS, Urban Centers are defined as:

A mixed-use area that includes high-density residential, office, and retail, and public and community facilities. Pedestrian connections are provided along high-capacity routes or transit corridors.

What this definition implies is that the transit corridors will be utilized as a component of the development but throughout the DSEIS, references are made to no plans for Sound Transit commuter services as reported on page 3.11-46. What public transportation services will be required?

5 Pt. Wells has two communities as its neighbor: the Town of Woodway with approximately 475 homes and the Richmond Beach community located within the City of Shoreline. Both communities are zoned single family residential. The DSEIS states on page 1-16 states that "The presence of high-density residential and commercial

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uses in close proximity could adversely affect low-density residential uses by creating increased noise, light and glare, and traffic congestion in the area." This conclusion as reported in the DSEIS is key. Compatibility between two very different zoning districts needs to be carefully planned for. The County must develop additional policies regarding design standards that will speak to these issues. These policies are important for the entire process, and should not be relegated to merely an administrative review conducted after the scope of the project has been determined. These policies need to be proposed now and then deliberated on by County Council and formalized as part of the Docket XIII process.

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It is important to note that Snohomish County's other Urban Center Demonstration Project sites have not been located near single family residential neighborhoods and this is an important difference with Pt. Wells. I have attended several County public hearings where citizens from established neighborhoods have complained about new development and its lack of compatibility. County government is seeking greater collaboration with affected neighborhoods and we endorse these efforts. Smart growth should be able to happen at the local level with cooperation and sensitivity to existing, real neighborhoods. To assist the County in this effort to adopt design concepts that will address existing view corridors, light and glare, bulk and density, the Town will submit an addendum to this testimony prior to the close of the review period.

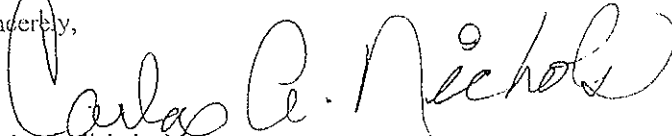
In summary, the Town of Woodway concludes that the 3500 dwelling units need to be substantially reduced to help us better coordinate with Snohomish County and the applicant to reach a more realistic project scope and mitigation of community wide impacts.

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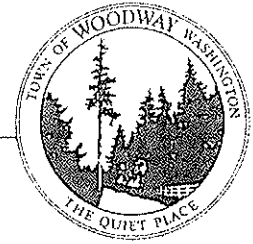
Given that the project site makes up the majority of our MUGA, and thus is ultimately a candidate for future annexation to the Town, we believe it is vitally important that the future project be consistent with the Town's design standards. Toward that end, and as is stated in our comprehensive plan, Woodway requests that we participate and coordinate with the County on the implementation of the zone district through the UCDP.

Please be apprised that the Town will provide supplemental testimony, including proposed design-related policies prior to the March 23, 2009 close of public comments.

Sincerely,


Carla A. Nichols, Mayor

CC: Woodway Town Council
Snohomish County Council
Snohomish County Executive Reardon



March 23, 2009

Snohomish County
c/o Craig Ladiser, Director of Planning & Development Services
3000 Rockefeller, MS 604
Everett, WA 98201

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PLANNING & DEVELOPMENT
SERVICES

Dear Director Ladiser,

1 This submittal represents the Town of Woodway's final submission of testimony regarding the DSEIS associated with Docket XIII, Paramount Petroleum LLC's proposal for a comprehensive plan amendment. We appreciate the attention that you have given this complex, far reaching proposal. We continue to express our concern, however, that approval of this proposal is premature without the identification of a specific project, without the simultaneous adoption of zoning provisions and design standards, and without an interlocal agreement with the Town.

2 The unique characteristics of Point Wells, particularly its very limited ingress and egress, its single ownership, the lack of public transportation and the character of the established residential neighborhoods surrounding the property, make development of this site particularly challenging. While the Town of Woodway is supportive of a mixed-use development at Point Wells, creation of a successful project at this location requires carefully considered legislative leadership. Snohomish County's General Policy Plan (Land Use 4.B.1 and 4.B.2) states that urban centers must be guided by certain design principles. Accordingly, the Town of Woodway urges your adoption of design guidelines specific to Point Wells into County policies.

3 Attached you will find the Town's proposed amendment to the Countywide Planning Policies, entitled LU 4.B.3 Point Wells Design Guidelines. We recommend that the Final SEIS respond to these guidelines as means to mitigate the impacts identified in the Draft SEIS. Furthermore, we understand that you soon will begin review of design standards for urban center projects. The Town will be proposing specific detailed design standards to implement the attached design guidelines applicable to Point Wells.

4 Lastly, we want to express our concerns regarding the size of this project and its impact on neighboring communities. The applicant has stated that while the analysis of community

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cont. ↓ impacts in the Draft SEIS was based on a 3,500 unit development, a development of this scale would only form the upper limit for any development on the site and no specific development plans have been created. We want our County elected leaders to understand and appreciate that the scale of a 3500 unit development at Point Wells is far in excess of what would be acceptable to the impacted communities' of Woodway and Richmond Beach.

5 ↑ We have identified above some of the geographic and other challenges of development at Point Wells. These limitations would support our contention that no more than 1100 units, with high density commercial, office and residential mixed use, high density townhomes, and medium density cottage style development, would be appropriate. Our analysis shows that a financially feasible development of this scale can be constructed on the 40 developable acres at Point Wells, even after considering the cost of cleaning up the site (based on the property owner's estimates).

Thank you for considering our request. We look forward to working closely with you on this project.

Respectfully,



Carla A. Nichols
Mayor

CC: Woodway Town Council
Snohomish County Council
Snohomish County Executive

Proposed Amendments to Snohomish County Comprehensive Plan Countywide Planning Policies

Design Guidelines for the Proposed Point Wells Urban Center Comprehensive Plan Land Use Designation

Introduction:

The Town of Woodway surrounds Point Wells on three sides and will be impacted by the activities associated with a planned urban center on the waterfront portion of Point Wells. The Draft Supplemental Environmental Impact Statement (DSEIS) for the Paramount LLC proposal to amend the comprehensive plan for Point Wells to Urban Center describes the range of potential impacts that implementation of the proposal may have on surrounding neighborhoods. The DSEIS states that the proposed action (3500 dwelling units and 40,000-50,000 square feet of commercial uses) has the potential to impact existing surrounding neighborhoods as a result of an increase in height and bulk of buildings (up to 90 feet), a significant increase in the amount of light, glare, noise, traffic and obstruction of existing views of Puget Sound.

The Town understands that the current environmental analysis is programmatic and that specific project level review is necessary to identify more specific impacts and assign meaningful mitigation measures. Given this, the Town recommends that Snohomish County adopt policy-level actions now to help define the eventual project to be more compatible with surrounding residential neighborhoods. The adoption of amendments to the countywide planning policies specifically applied to Point Wells will benefit both the applicant and the surrounding neighborhoods.

New countywide planning policies will be helpful to provide general guidance to the applicant when defining the scope of the eventual project. New countywide planning policies will also be helpful to the surrounding communities in knowing that progressive design guidelines and an effective design review process can reduce environmental impacts while creating attractive, sustainable and livable urban environments. The Final SEIS should respond to the design guidelines contained herein as measures to mitigate the impacts defined in the DSEIS.

Snohomish County General Policy Plan-Countywide Planning Policies

The Snohomish County General Policy Plan recognizes the importance of having appropriate tools to plan and develop well-designed and functional urban environments. For example, the urban design policies of the Snohomish County General Policy Plan state that,

“To enhance the character and quality of development within the UGA’s, the county intends to develop and implement comprehensive design guidelines. The intent of these guidelines will be to ensure that urban residential, commercial, industrial and mixed use developments relate to and are compatible with their surroundings.....”

In addition, Goal LU 4 and Objective LU 4.A address the preparation of design guidelines and a design review process to improve the quality of future urban developments. Focused specifically on compact urban form, Objective LU 4. B is stated as follows:

“Establish and implement specific design guidelines for mixed use areas – Urban Center and Urban Villages”.

The land use policies that are provided in the General Policy Plan to meet this Objective are listed in LU 4.B.1 and LU 4.B.2. These policies state that the County will consider design guidelines for urban centers to accomplish a set of common and acceptable urban design principles. Principles stated in the policies include the following:

- Centers that are visible and accessible to pedestrians from the street and create an identifiable sense of place;
- New buildings to be well-designed and create quality pedestrian places;
- Properly situated open spaces to compliment related uses;
- Assuring that building height, scale and character is compatible with surrounding uses;
- Parking configurations that complement site and building design;
- Assuring pedestrian connectivity to surrounding neighborhoods; and
- Promoting sustainable design with an emphasis on the public realm.

The Town of Woodway Comprehensive Plan

The Vision

The Town’s vision for Point Wells is to be a high quality mixed-use neighborhood of eclectic sustainable buildings that acknowledges the scale of the pedestrian and fosters the creation of a rich and inviting public realm.

Planning Objectives

To accomplish this vision the Town’s comprehensive plan establishes the following set of planning objectives for Point Wells that the Town strongly believes must be incorporated into the future design of the site, buildings, open spaces and connections to the surrounding neighborhoods.

1. Public and private waterfront uses and facilities will be pedestrian oriented and provide appropriately scaled connections to adjacent upland uses.
2. Restoration and enhancement of the site’s indigenous vegetation will mirror the dominance of the Town’s natural vegetative character and further the Town’s environmental stewardship.
3. Sustainability of natural and man-made systems will be incorporated into site and building design.
4. Development scale, activities and services will complement, rather than detract from, the character of Woodway.

New CPP LU 4.B.3 Point Wells Design Guidelines

To achieve the above goals, policies and principles for urban centers set out the Snohomish County General Plan and the vision and objectives for Point Wells set out in the Woodway Comprehensive Plan, the Town recommends the adoption of a set of design guidelines.

The design guidelines have been prepared specifically for the proposed Point Wells Urban Center and are intended to respond to the aesthetic and land use policies impacts listed in the DSEIS. The attached Point Wells Urban Center Design Guidelines represent commonly accepted design principles that have been applied to successful compact mixed-use centers within the Puget Sound Region. The recommended design guidelines for the proposed Point Wells Urban Center address the following basic design elements:

- Connectivity
- Sensitivity to the Natural Resources and Sustainability
- The Public Realm
- Streetscapes
- Building Orientation and Parking
- Street Level for Mid/High Rise Buildings
- Open Space and View Corridors
- Architectural Compatibility and Quality

The Town of Woodway recommends that Snohomish County adopt the guidelines as an integral component of the Countywide Policies to be inserted at LU 4.B.3 and that the Final SEIS respond to these guidelines as means to mitigate the impacts identified in the Draft SEIS.

New CPP LU4.B.3 Implementation of the Point Wells Urban Center Comprehensive Plan Designation

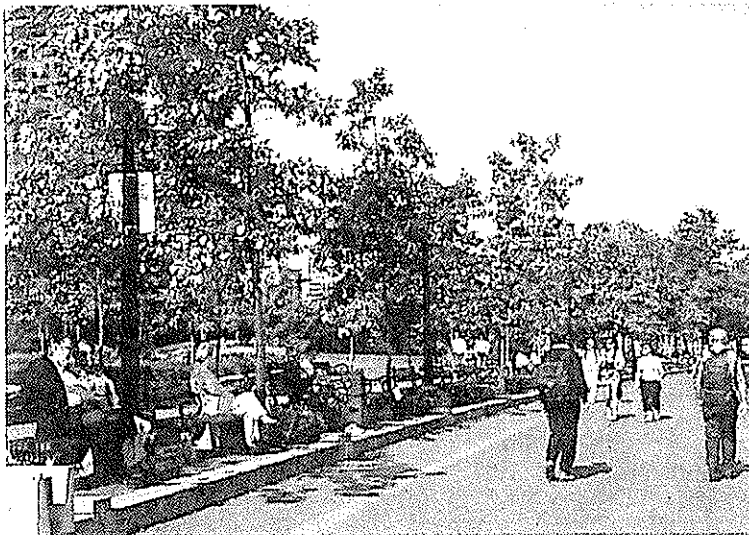
Implementation of the Point Wells Urban Center will occur through the application of the Urban Center Zone District. In addition to the defined use and bulk requirements, the district text should also include design standards (based on the design guidelines presented herein) and provide for the following three important implementation tools.

1. A requirement that the Point Wells Urban Center Design Guidelines be used by the applicant for the preparation of a master plan and attendant building plans;
2. That a development agreement be used to bind the parties to the approved conditions of the master plan; and
3. That an administrative design review panel composed of qualified design professionals be created to recommend design-related elements to the approving authority.

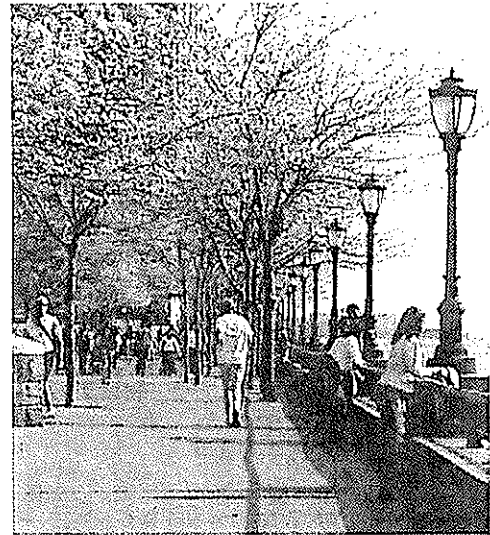
Connectivity

An interconnected system of streets is an important aspect of the Pointe Wells Urban Center. The interconnected street pattern should incorporate block lengths that are at a pedestrian scale to allow pedestrian connectivity. The circulation system will help shape the character of the community and affect its vitality. Streets that do not connect, such as cul-de-sacs and gated communities shall not be allowed. Narrow streets should be incorporated to reduce impervious surfaces and slow vehicular speeds.

Pedestrian connectivity is also an important ingredient in the success of the neighborhood center. A highly walkable neighborhood center with an integrated and layered movement system should be incorporated into the future master plan at Point Wells. The Urban Center should provide connections to any adjacent transit system, which will make the neighborhood center more vibrant and successful. It will also minimize vehicle trips within the site. The master plan should emphasize accessibility to amenities by non-vehicular travel including pedestrian, bicycles and transit. Interconnected streets and pathways designed for the pedestrian should connect all elements of the community. This internal bicycle and walkway system should also connect to the surrounding community. The distinct boundaries of Point Wells are an asset to the development. However these boundaries must be bridged by providing strong connections to the neighboring community in order to create and enhance a complementary relationship.



Pedestrian Connections

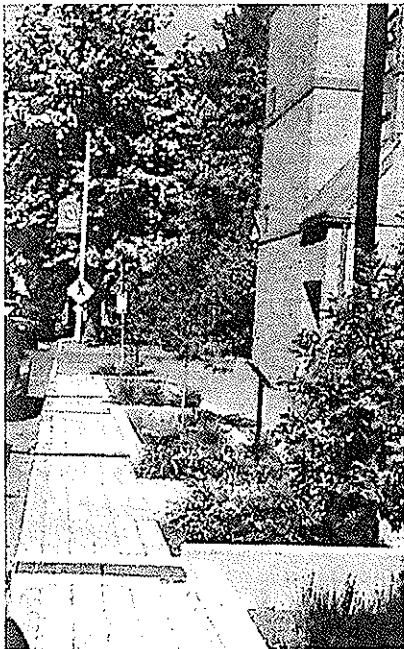


Waterfront Promenade

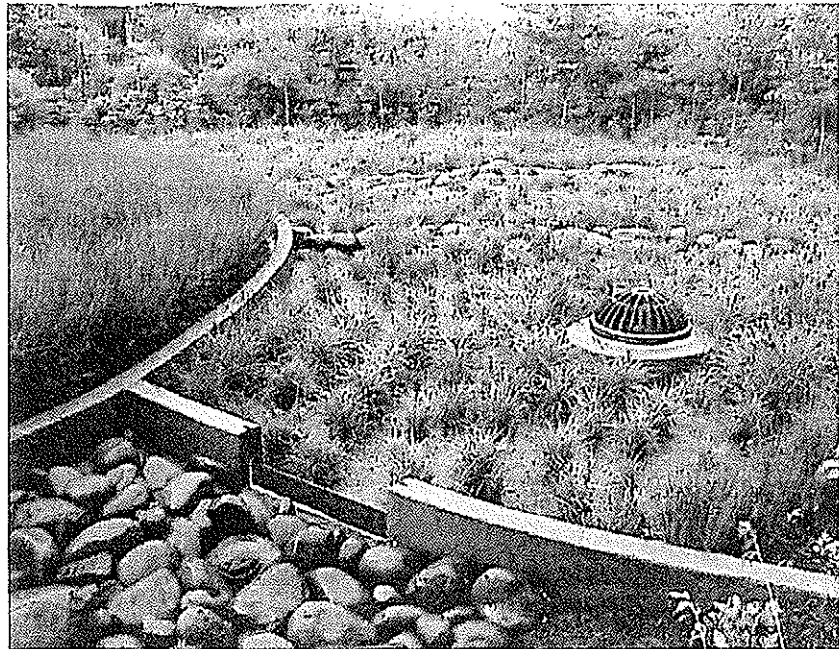
Sensitivity to the Sites Natural Resources and Sustainability

The Point Wells Urban Center should be designed to complement and incorporate the values of the Town of Woodway. Woodway is a residential community sited among mature trees. Woodway's values include the preservation of the natural environment, enjoyment of this natural setting through walking and biking. Bicycle and pedestrian walks shall be incorporated into Point Wells and linked back into the surrounding neighborhood. Woodway also values natural resource conservation. Preservation of the sites natural amenities is a very important aspect to the development. Access to the water's edge shall be provided to all residents of the community. The views of the surrounding neighborhoods shall be considered when designing the master plan.

The development of Point Wells shall focus on sustainable site and building design principles. Sustainable strategies can provide a number of social and economic benefits. The master plan shall be designed to LEED ND standards, including street and grid layouts and solar orientation. The stormwater management approach shall incorporate low impact design and be energy efficient. Buildings shall be LEED certified buildings and shall focus on water conservation, energy efficiency, indoor air quality, and waste management.



Urban Stormwater System



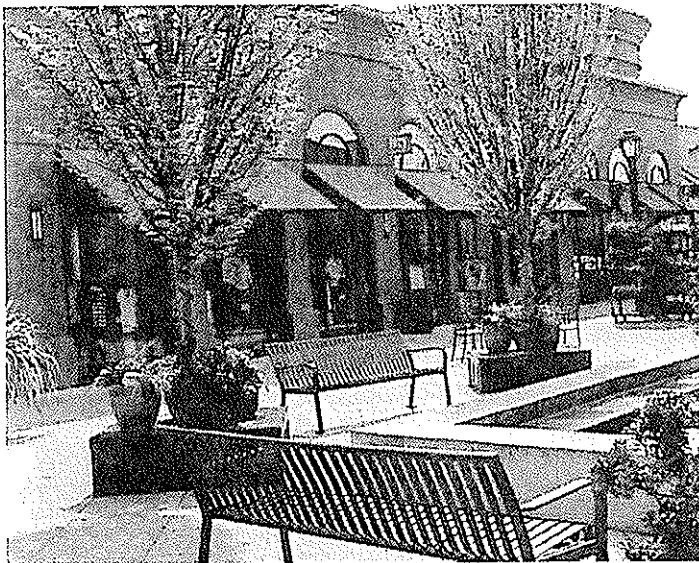
Site Stormwater Management

Public Realm

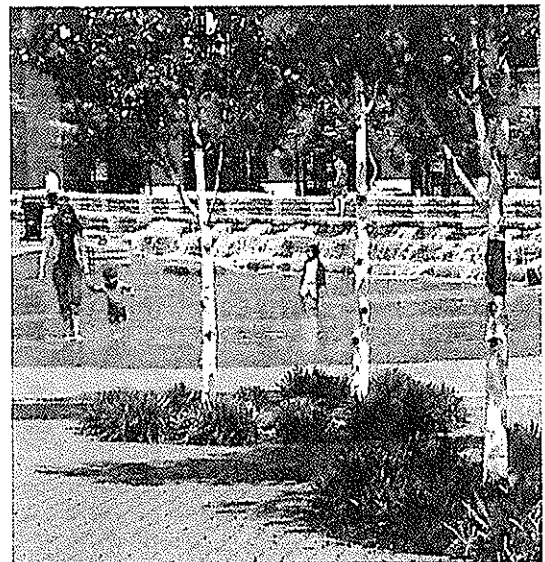
Point Wells Urban Center shall be designed as a pedestrian friendly community. The design of the public realm, such as the sidewalks, plazas and parks has the most impact on how to make the urban center pedestrian friendly. The relationship between the building and the street or the entry sequence is a very important aspect of the design. The public realm and semi-public realm are important to the success of the development.

The public realm includes the area within the right-of-way, pedestrian ways, sidewalks and parks. The public realm is usually fronted by store fronts and residential units and includes attractively landscaped street trees and sidewalks. Buildings should abut the right-of-way or in certain situations buildings may be set back to create courtyards, plazas or other community gathering spaces.

The semi-public realm is the space between the front of the buildings and the right of way. Front porches or stoops are excellent transitions between the two realms. The semi-public realm could consist of a small patio or a raised yard. This transition area provides a slight separation of public space from private, and increases the desirability of the open space. Raising the yard also provides the residents more privacy from the street level. Typically parking areas and garages are entered from the alley, keeping them out of the public realm. Building setbacks shall vary to avoid a monotonous streetscape.



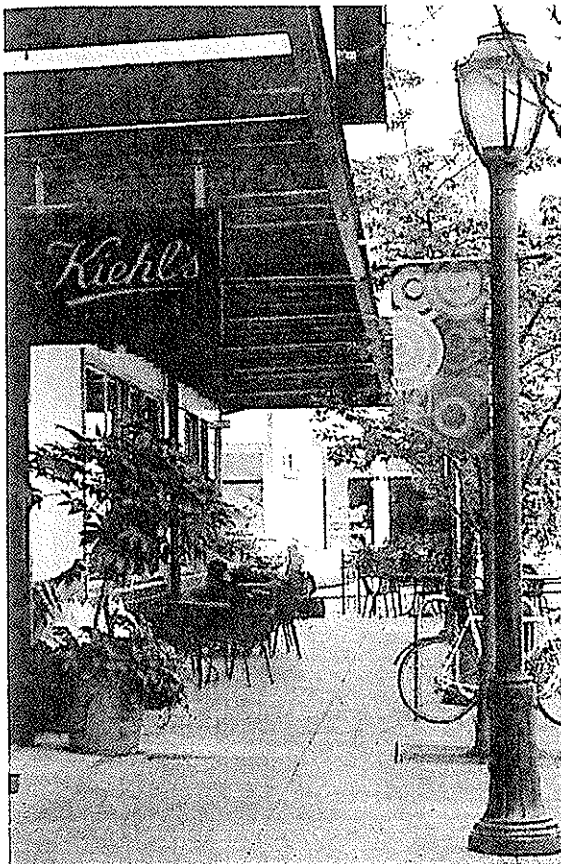
Urban Courtyard



Public Space

Streetscape

The streetscape of the Point Wells Urban Center should be designed for the pedestrian. The master plan should include design elements that help to create a sense of place for Point Wells Urban Center. A sense of Place can be achieved in the master plan through the creation of community focal points, such as a village green, public open space or a distinctive architectural element. The focal point should be a landmark that is both inviting and at a pedestrian scale where residents will want to gather and give the Urban Center vitality. The ambiance of the streetscape derives from many design elements of the natural and built environment. Site furniture helps define a space. Street furniture such as benches, planters and trash receptacles shall be provided to improve the pedestrian experience. The repetition of benches, street trees, trash receptacles, signage, public art and lighting all influence and enhance the streetscape. Site lighting should be designed to be subdued but adequately provide and control lighting in public spaces for safety. All lighting shall use full cut off fixtures and shall be directed downward to prevent lighting the night sky. Lighting shall be designed to promote energy efficiency. Poles shall be of an appropriate pedestrian scale height and spaced appropriately to avoid over lighting.



Street Furniture



Inviting Streetscape

Building Orientation and Parking

Buildings within the Point Wells Urban Center should be oriented toward, public streets, sidewalks and pedestrian activity, rather than parking lots and automobiles. All buildings shall be oriented to the street with building facade located immediately adjacent to the public right-of-way. Buildings should have doors and windows facing the street. Parking lots should be designed to be visually unobtrusive by means of location, size and screening. A discrete parking lot will reinforce the continuity of the pedestrian realm. Off-street surface parking areas shall be oriented internally to the lot, behind or to the sides of buildings. Parking areas should not front on primary pedestrian streets, rather they should be accessed by alleys, driveways or secondary streets. Parking lots should be screened from the public realm by walls, fences or densely planted vegetation. Service access to buildings shall also be on alleys and drives within the blocks, or from secondary streets.

Residential parking should be accessed from an alley. Townhomes may have its garage located on, and fronting, a secondary street, but the garage must be recessed into the front facade of the home and the garage must not dominate the streetscape. Architectural elements should be used to minimize the impact of the garage.



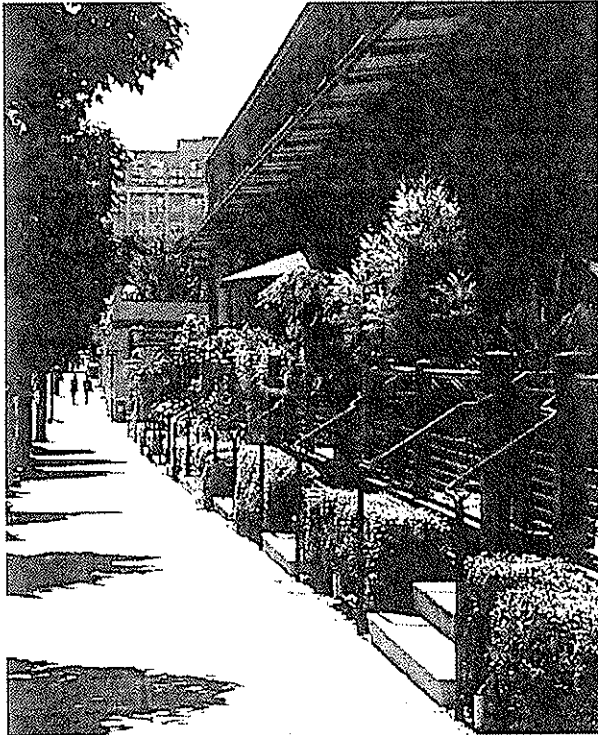
Off-Street Parking



Courtyard Alley

Street Level for Mid Rise Buildings

Building design at street level should create a pedestrian scale and rhythm. The design should also foster both variety and overall unity within the district by providing a pattern of continuous ground floor store fronts. Buildings should abut the public right-of-way and visually engage the pedestrian through storefront windows and entrances, pedestrian oriented displays, signage, and different building materials, textures, and colors. The use of canopies is encouraged to provide protection from the elements for pedestrians. Street level ground floors are not intended to require a certain type of architecture, rather they should emphasize human scale, pedestrian orientation, ground floor transparency, variety and quality construction as the common theme, with the goal of creating overall unity within the Point Wells Urban Center. Storefront entry doors should be oriented to the street and recessed from the street front. Transparency of the building envelope at the street level provides a pedestrian friendly environment. The treatment of the ground plane is an essential component of creating interest and variation to the streetscape. Retail base height should be appropriate to the scale of the pedestrian and proportionate to the building scale.



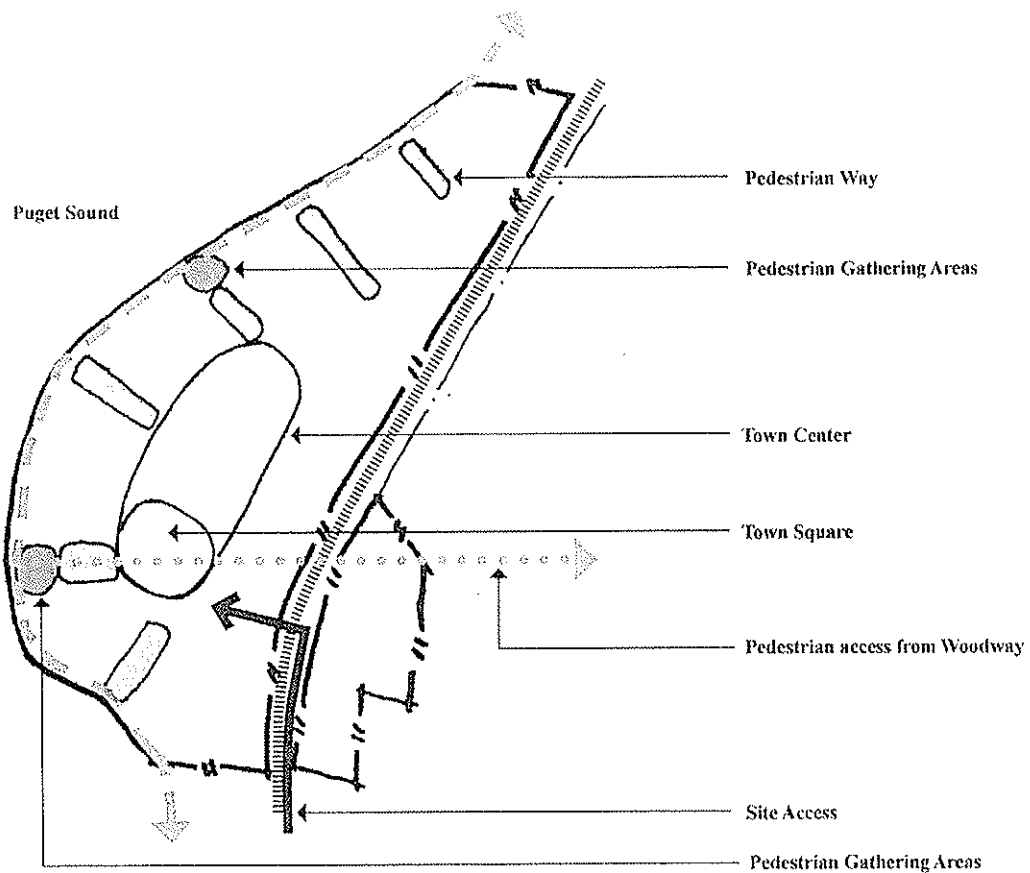
Pedestrian Scale Streetscape



Mixed Use Buildings

Open Space and View Corridors

The water's edge at Points Wells is a valuable regional asset. The site offers direct contact with, and magnificent, unobstructed views of Puget Sound. This is a rare amenity that should inspire an image and focus for the Urban Center. All the residents of the Point Wells community, along with the residents of the surrounding neighborhoods, should be able access and enjoy the connection with the water's edge. A continuous, public pedestrian walkway, linking a series of parks and plazas along the water's edge should be incorporated into the master plan and building design. Creating links from the Urban Center to the water's edge enables and encourages pedestrian accessibility from the neighborhoods, and develops a functional and symbolic relationship with Puget Sound. These open space links may also be used to create view corridors to the water. High quality landscaping will be critical to the success of the Urban Center. The landscape plan should accommodate native drought tolerant plant material and stormwater treatment as a part of the landscape.



Trail Network

A comprehensive system of trails, open spaces and pedestrian ways should be incorporated into the design of the master plan and create a variety of open space experiences. The open space and trail system at Point Wells shall connect to the surrounding neighborhood and allow residents from the surrounding neighborhood to enjoy it. There should be a variety of open spaces incorporated into the design of the community and they should include a town square, common greens, pocket parks and pedestrian ways.

Town Square

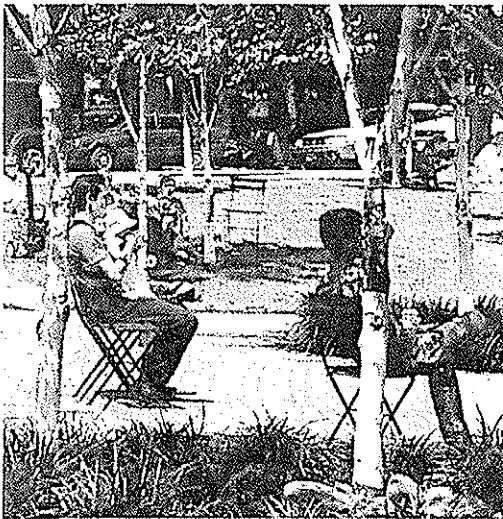
The town square should be located in the Urban Center to create a heart for the community. This will be a focal point for the community and a place where residents can gather to participate in a variety of celebrations and community events. This town square may include benches, water features, and plaza and open lawns.

Common Greens

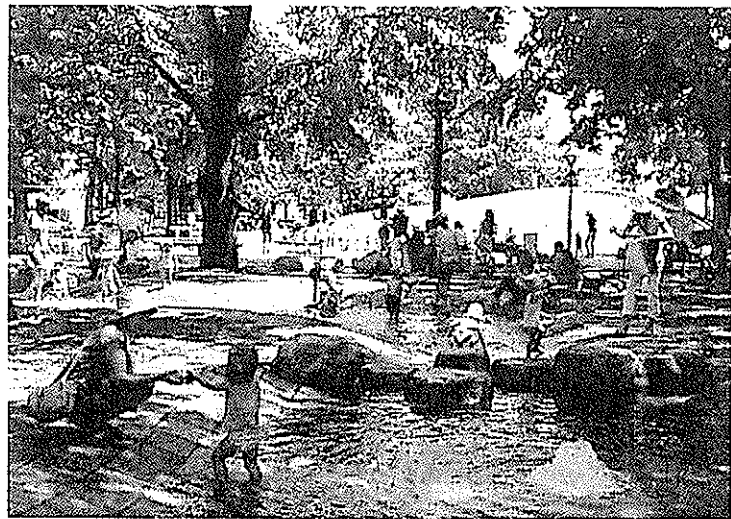
Common greens are also important aspects of the master plan. These spaces are more neighborhoods orientated and can be where people gather to sit; children play, gather together or walk their dogs. These parks also help to mitigate the impact of high density community. Common greens should be located throughout the Point Wells Urban Center. These parks are typically smaller and have homes orientated with their front doors facing these them. Common greens should function as community building places. Common greens shall be visible and accessible from the streets.

Pedestrian Ways

Pedestrian ways are nicely landscaped linear parks that can be used by pedestrians. They allow pedestrians to have mid block connections. These pedestrian ways should connect to the central park and to the water's edge. Buildings should front or side on these spaces.



Common Green



Town Square Open Space

Architectural Compatibility

The Point Wells Urban Center should reflect a clear hierarchy of form and massing with the obvious expression of primary and secondary forms. Primary massing elements, both horizontally and vertically break up larger mass of buildings to fit into the Urban Center street character. These elements can include building modulations based on bay sizes and upper story setbacks for limited portions of the façade. Secondary formal elements may include canopies, bays, projecting decks, sun screens, parapets and other significant features as appropriate. The ground floor story shall be taller than subsequent upper stories to break up the mass of the building. The minimum first floor height shall be 12'. The retail or commercial base should be appropriate to the scale of the pedestrian and should be proportionate to the overall building scale. The massing of the buildings is encouraged to create open space as in courtyards, pedestrian ways and plazas. Articulation through devices such as vertical breaks, variation in height, and a coordinated range of details should be employed to help reduce the apparent mass of large buildings.

For mixed use developments, the primary building elevation towards the street or common green must be articulated. An articulation is an element like a sunscreen setback, a bay facing the street, a change in plane at a change in material or a well defined entry element. Articulation of the base should have a direct relationship to the architectural elements and massing above. Building facades must have openings including doors and windows. Blank walls are prohibited.

The form of the public realm- the shape of the outdoor rooms created by the buildings that flank the streets and open space is critical to defining the character of a Place. The height of the adjacent buildings is a key element to defining that form. The height limit at Point Wells should not exceed 65'. Variation of height is encouraged to provide interest and diversity to the streetscape. Taller, higher density buildings are to be placed in the center of the site, with medium density buildings to the water's edge and backing up on the railroad tracks. Lower density will occur on the northern and the southern portions of the site. Figure 1 indicates building heights that are sensitive to the surrounding neighborhood.



Articulated Architecture

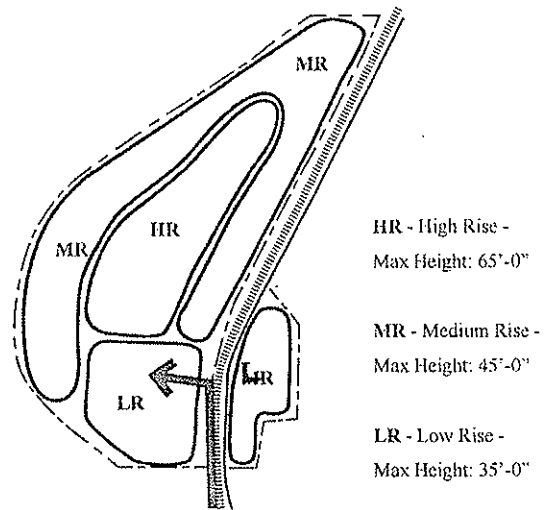


Figure 1 - Density Diagram

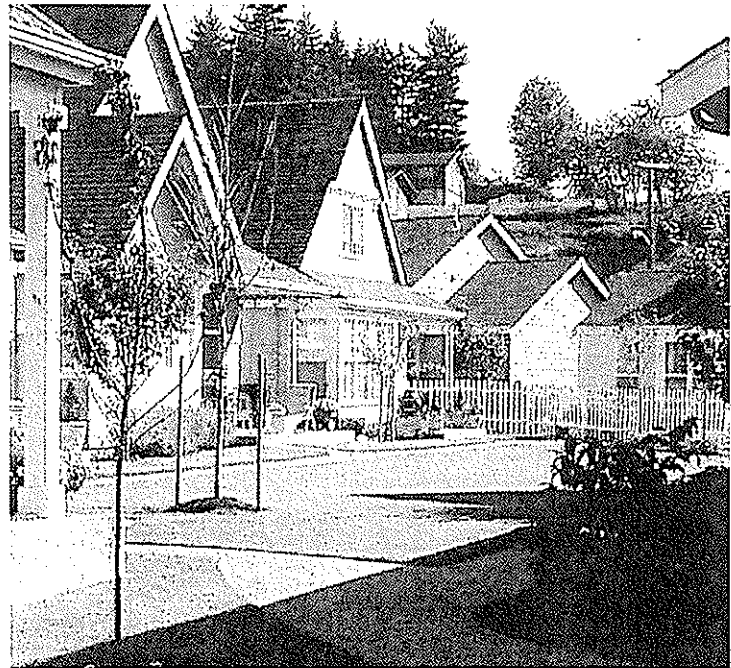
Architectural Quality

The Pointe Wells Urban Center should be made up of diverse architecture. While the neighborhood should be unified, it still should have a variety of architectural styles that reflect the community values of Woodway. Varied and high quality materials are essential and enriching components of the Urban Center pedestrian experience. Point Wells is envisioned to be a high quality mixed use neighborhood of eclectic sustainable buildings that acknowledges the scale of the pedestrian and foster the creation of a rich and inviting public realm.

The architecture should have the impression of being built over time. The overarching goal of the architecture is authenticity. The Urban Center should be comprise of a variety of uses and provide a range of building types and expressions that add up to a neighborhood that is authentic. The architecture should use articulated roof forms and a variety of colors, varying siding and patterns to create diversity and individuality for each building. Flat roofs with parapet walls are typical of an Urban Center character and should include varied roof lines and parapet heights. The use of bays and other articulation help break up large walls. A variety of forms and materials provide individual scale and presence along with a variety of styles. Many architectural styles are encouraged. Traditional, historically-inspired buildings as well as contemporary vernaculars may be included. No more than 2 buildings may be the identical except for lower density residential, which may include townhomes, rowhouses or even cottage style housing.



Mid-Rise Housing



Cottage Style Housing

