

Skorney, Steve

From: Chambers, George [ChambGW@wsdot.wa.gov]
Sent: Tuesday, March 24, 2009 7:43 AM
To: Skorney, Steve
Cc: WSDOT Comments
Subject: FW: Point Wells DSEIS Comment Period Ends March 23rd
Attachments: Point Wells

Steve Skorney
 Planning & Development Services
 Snohomish County

Here are some WSDOT comments on the Point Wells proposed development.

*George Chambers
 WSDOT-Northwest Region
 Senior Development Services/
 Local Agency Engineer
 Phone: 206-440-4912
 Fax: 206-440-4806
 15700 Dayton Avenue North, MS: NB82-240
 PO Box 330310, Seattle, WA 98133-9710*

From: Swires, Mike
Sent: Monday, March 23, 2009 4:58 PM
To: Chambers, George
Subject: FW: Point Wells DSEIS Comment Period Ends March 23rd

Some initial comments. I'll follow up tomorrow with anything else I come up with.

<<Point Wells>>

From: Brown, Rob
Sent: Wednesday, March 18, 2009 1:53 PM
To: Swires, Mike; Mansfield, Mike; Roberts, Rick
Subject: RE: Point Wells DSEIS Comment Period Ends March 23rd

Some randomness from my look at the transportation section.

SR 99 is described as the "regional access" to the study area. Given that now major road improvements are recommended we assume that the majority of the development's traffic will use Richmond Beach Rd and N 185th St to get to SR 99. From there trips are likely to split into northbound and southbound traffic. We also feel that a high percentage of these new trips will use I-5 to get to destinations north and south of the project area. We feel it is reasonable that the following intersections also be analyzed:

SR 99 / SR 104 interchange
 SR 99 / N 160th St
 SR 99 / N 155th St
 SR 99 / N 145th St (SR 523)

I-5 / 175th interchange
I-5 / 145th (SR 523) interchange
I-5 / SR 104 interchange

2 Development doesn't match trip projections on 3.11-26:
3,500 residential units (page 2-8) 3220 for traffic analysis
60,000 to 70,000 sf commercial (30 acres, page 2-9, 802 employees, page 2-9) 528 employees for traffic analysis
10,000 to 15,000 sf retail (page 2-8) 68,000 gross sq ft for trip generation

3 10% trip reduction for walk/bike seems REALLY high given they used 34% for retail pass-by and 3%-6% for internal capture for all land uses. 16% of the PM residential and 16% of the office building trips are non-motorized? I can understand 34% for pass-by with this large community in a low density SFR area. Page 3.11-29 says they reduced total trips by 10% for mixed use development. I guess that explains the disparity between calculations and their numbers. A 10% reduction in total trips and 34% pass-by for retail? Really?

4 The increases in traffic at SR 99 / 185th is laughable. There will be more than an additional 65 AM and 80 PM vehicles as a result of this project. Same with SR 99 / 175th, 55 AM and 55 PM.

5 I don't think their AM trip distribution is that far off. It shows 80% of the trips using SR 99 and I-5. It doesn't say how they get there. Most likely from SR 99 to N 185th St. Not sure about 25% of the PM trips going into Edmonds.

6 WSDOT's LOS standards should be shown for SR 99 and SR 104 in section 3.11 Intersections. See Appendix 29 of the Development Services Manual. <http://www.wsdot.wa.gov/Publications/Manuals/M3007.htm> The LOS standard for both SR 99 south of SR 104 and SR 104 in the study area is LOS D. SR 99 north of SR 104 LOS E Mitigated may be used. A mitigation plan is necessary, otherwise LOS D should be used.

From: Chambers, George
Sent: Wednesday, March 18, 2009 10:58
To: Brown, Rob; Conyers, Ed; Pazooki, Ramin
Cc: Roberts, Rick; Swires, Mike; Schuyler, Sam; Mansfield, Mike
Subject: RE: Point Wells DSEIS Comment Period Ends March 23rd

Hi All,

I talked to Steve Skorney at Snohomish County Planning & Development Services. The Chevron Tank Farm property was bought by Paramount of Washington LLC. They are looking at developing the site at a later date if the land use can be changed by Snohomish County. Chevron is still using the tanks for storage at this time. They used 3,500 potential dwelling units as a maximum when doing the Draft Supplemental EIS. There is no site plan yet. Other EIS's would be done later with more detailed traffic studies. The developer would be looking at developing the site in order to pay for the tank farm demolition and clean up. So it could be several years before anything happens. The Snohomish County Council will meet in June '09 to decide about doing the land use change.

Steve Skorney said if WSDOT has any comments, brief ones would be okay for now on the DSEIS. They still need to be to him by March 23. If you have any at this time, please email them to me and I will forward them on the the County. Steve would like any of our comments, so the County Council would have them for their meeting.

George Chambers
WSDOT-Northwest Region
Senior Development Services/
Local Agency Engineer
Phone: 206-440-4912

From: Brown, Rob
Sent: Wednesday, March 18, 2009 10:05 AM
To: Conyers, Ed; Pazooki, Ramin
Cc: Roberts, Rick; Swires, Mike; Schuyler, Sam; Chambers, George
Subject: Point Wells DSEIS Comment Period Ends March 23rd
Importance: High

:Nil,

See the Woodway Town Council meeting minutes in the link below. Pages 2 and 3 discuss the DSEIS for Point Wells. The last day to comment is March 23, 2009.

The EIS says a copy was sent to "Department of Transportation, Northwest Region.

[http://www.co.snohomish.wa.us/documents/Departments/PDS/Planning Commission/2009/AgendaDocs/DraftSEISParamount.pdf](http://www.co.snohomish.wa.us/documents/Departments/PDS/Planning_Commission/2009/AgendaDocs/DraftSEISParamount.pdf)

See page 4-2, sheet 233 in the PDF.

-Rob

Rob Brown, P.E.

Assistant King Area Traffic Engineer


Washington State Department of Transportation

Telephone: 206-440-4413 Facsimile: 206-440-4804 Email: BrownR@wsdot.wa.gov

Any correspondence sent to and from this email address is subject to Washington State's public disclosure laws.

Skorney, Steve

From: Brown, Rob [BrownR@wsdot.wa.gov]
Sent: Wednesday, March 18, 2009 5:38 PM
To: Swires, Mike
Subject: Point Wells

 Shoreline is taking out the second left turn NB 99 to WB 185th and adding BAT lanes. The EIS didn't include the correct future improvements.

Sent from my Windows Mobile® phone.

Linda Bentley

From: Skorney, Steve [Steve.Skorney@co.snohomish.wa.us]
Sent: Tuesday, February 17, 2009 8:21 AM
To: Linda Bentley
Subject: FW: Tsunami impact for the area of Point Wells

Linda:

Good morning. I consider the attached a comment on our Draft SEIS. So here it is. I also let the sender know that his comment will be included and responded to in the Final SEIS. George and I are meeting this morning to prep for the planning commission hearing and follow up deliberations regarding traffic issues. I will pass along any strategies that George may have.

Thanks

-----Original Message-----

From: Marcellus Buchheit [mailto:mabu@acm.org]
Sent: Monday, February 16, 2009 1:24 PM
To: Skorney, Steve
Cc: jtovar@ci.shoreline.wa.us; scohn@shorelinewa.gov
Subject: Tsunami impact for the area of Point Wells

Dear Mr. Skorney,

I got your name during a meeting of the Richmond Beach Community Association about the future Point Wells. We got informed that there are at least some options of having 3500 houses with then potentially 6400 people. Or having commercial space (offices) or retail space.

I want to inform you with this email that there is a likelihood of serious tsunami damages for the low-land area of Point Wells. Such tsunamis can be created by local earthquakes, landslides or even (more unlikely) by earthquakes in Alaska or in the Pacific. They are more and more part of serious geologic research in the area. See more details in the links below. As far I know the west part of the Point Wells area is quite flat and just a couple of feet above the high tide. There is also a likelihood that with global warming the high tide will become higher in future. In a case of a strong tsunami, residents or employees have to be warned in a very short time (minutes) and need an evacuation plan. The higher areas of Point Wells are themselves subject for landslides and beyond the railway – probably not a safe and realistic evacuation location. Without warnings and evacuation areas, there is a risk of many fatalities – probably in the thousands with a dense residential population and a nighttime tsunami. After such a disaster I'm sure the public would ask about the responsibility having houses or offices in the area.

Some links I found with some Google search:

- <http://www.pmel.noaa.gov/pubs/PDF/gonz2526/gonz2526.pdf> A good introduction as a report from a Puget Sound Tsunami Workshop in 2002.
- <http://nctr.pmel.noaa.gov/pugetsound/pre2/#fig3>: Maps of a simulation of Tsunami after an Earthquake in the Seattle Area. Even from there is some impact to Kingston, less to Edmonds. It is not described how the impact to the Point Wells area would be.
- www.cityofshoreline.com/Modules/ShowDocument.aspx?documentid=40: City of Shoreline Hazard Mitigation Plan with several descriptions of potential tsunami danger at the coastline.
- http://www.esca1.com/documents/mitigation_plan2004/section3_z_portofedmonds.pdf North King and South Snohomish Counties Section III – Multi-Jurisdictional Breakouts
Regional Mitigation Plan: Port of Edmonds

I hope that the fact "Tsunami Danger for Point Wells" finds a serious way into your discussions about the future use of this shoreline area.

Best wishes from Edmonds (north of Seattle, WA)
 Marcellus



King County

Bob Ferguson

Councilmember, District 1

Metropolitan King County Council

March 23, 2009

Director Craig Ladiser
Snohomish County Planning & Development Services
c/o Steve Skorney, Project Manager
3000 Rockefeller Avenue
Everett, WA 98201X

Dear Director Ladiser:

Thank you for the opportunity to comment on the proposal and Draft Supplemental Environmental Impact Statement (DSEIS) for the Comprehensive Plan Amendment: Docket XIII, SW 41, the Paramount (Point Wells) Amendment.

As the representative of the City of Shoreline on the King County Council, I am writing to reiterate their comments and concerns about the DSEIS.

1 The site of the Paramount proposal, Point Wells, is immediately adjacent to the City of Shoreline. Due to the site's topography and resulting access constraints, the City of Shoreline will be directly affected by the impacts of the development of an urban center at Point Wells. I write to reinforce the City of Shoreline's concerns that the DSEIS does not fully disclose the impacts to the city, and does not appear to offer reasonable mitigation in cases where impacts are identified.

2 As the DSEIS notes, Richmond Beach Drive in Shoreline would provide the only access into and out of the site, and all projected trips would travel on this roadway. Under the proposed land use, this roadway would carry a much higher traffic volume. However, not enough information is available in the DSEIS to determine if the proposal is consistent with articulated transportation goals and policies. The mitigation of transportation impacts is expressly identified in the DSEIS as a major issue to be resolved, which is of particular concern considering that the actual increase in traffic is considered a significant unavoidable adverse impact of the proposal.

3 In addition, it appears that transit use is presumed to reflect typical levels that are implicit in the Institute of Traffic Engineers standard method for trip generation calculations, and the DSEIS references Community Transit and Metro Transit routes located in the study area. However, as the SEIS correctly identifies, the nearest part of

3
cont.

the project site is approximately one-half mile from the nearest Metro Transit route. In short, while transit use is assumed in the traffic calculations, there are no assumptions made in the DSEIS that transit service to the site will increase or otherwise become more accessible. Moreover, Metro Transit is an agency that is primarily supported by King County tax dollars and is facing significant budget constraints. Given the number of competing demands for service within King County, it is unclear how extending service to Snohomish County could be accomplished without a detailed plan for funding service extensions.

4

Lastly, the City of Shoreline has expressed concerns, which I share, regarding the provision public services such as police, fire, libraries, and parks. With primary ingress and egress to Point Wells being through Shoreline, the resultant increased demand on these services will be impacted.

Thank you for your consideration.

Sincerely,



Bob Ferguson
King County Councilmember

cc: Snohomish County Council.
Aaron Reardon, Snohomish County Executive

Evans, Sally

From: Gary Huff [GHuff@karrtuttle.com]
Sent: Friday, February 27, 2009 3:48 PM
To: Evans, Sally; Skorney, Steve
Cc: Douglas A. Luetjen
Subject: letter to Planning Commission re Paramount of Washington, LLC/Docket XIII
Attachments: ktc.jpg; I-SnoCo PC_v1.PDF


Ms. Evans--Please accept this letter regarding Paramount of Washington's pending Docket XIII application.
Thanks.

Gary Huff

KARR ▾ TUTTLE ▾ CAMPBELL

Gary Huff
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A Law Firm for the Pacific Northwest

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*emailed to PC 3/2/09
Doris Luetjen*

Law Offices

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Founded 1904

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Please reply to Seattle Office

Gary D. Huff
(206) 224-8024
ghuff@karrtuttle.com

February 27, 2009

Snohomish County Planning Commission
3000 Rockefeller Avenue, M/S #609
Everett, WA 98201

RE: Comprehensive Plan Amendment Docketing Request
Docket XIII File I.D #SW 41
Paramount of Washington, LLC - Point Wells Property

Dear Commissioners:

Near the end of last Tuesday's Batch 2 hearing, Commissioner Reiersgard raised several questions concerning Paramount's docket request and application. This letter is forwarded in response to at least some of those questions.

1 Among Commissioner Reiersgard's concerns was what was viewed as a discrepancy between Paramount's original docket application (which included language to the effect that the site "would accommodate 1,250-1,400 housing units") and the assumption in the draft SEIS that our eventual project may approach 3,500 units. We note first that neither an Urban Center comprehensive plan designation nor Planned Community Business zoning establishes or approves a unit count. We view the density issue, along with the attendant and more exhaustive SEPA analysis of additional alternatives, as the appropriate function of a project-specific EIS. Regardless and as indicated in our testimony last Tuesday, no decision has been made as to appropriate site density. Nonetheless, the following summary may help explain the difference in the density numbers used in the application and draft SEIS:

2

- First, the Docket XII application was submitted by a prior owner of the property. As indicated in the attached May 17, 2007 letter to Will Hall at PDS, Point Wells was sold on August 3, 2006 by Paramount of Washington, Inc., which submitted the application, to current owner Paramount of Washington, LLC.

3

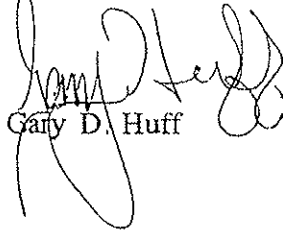
- As counsel for the new owner, this office was concerned that the original application conveyed the impression that approvals were being sought for a specific defined project. As we have repeated on numerous occasions, no decisions have been made regarding intended density or project parameters. Given the cost of site remediation, it is likely a safe assumption that Paramount's eventual proposal will not be low density. Whether that number will be above or below 1,400 is not known at this time.
- Given this uncertainty, and in an attempt to avoid any question regarding our true intentions, this office forwarded the enclosed letter dated October 23, 2007 to Mr. Steve Skorney. In that letter, we reiterated that the project has not yet been designed and requested that "the pending non-project SEIS describe our proposal roughly as follows: Establishing an Urban Center Demonstration Project at Point Wells consistent with Snohomish County Code Chapter 30.31A (Planned Community Business zoning) and Chapter 30.34A (Urban Center Demonstration Program). Please accept this letter as confirmation that any prior communications regarding project scale or design elements, to the extent they are inconsistent with this letter, are withdrawn."
- The draft SEIS assumes a potential development of up to 3,500 units are our request—not because we intend to seek approvals for a development of that size but because of our desire to comply with the goals of SEPA. As I expressed in my testimony, we thought it advisable (not to mention legally required) that this document cover the broad range of potential density options. In addition, Paramount did not want to appear to have been anything but forthright if it eventually sought approvals for a project with density approximating that number.

4

With respect to the appropriateness of including a zoning request in the docket application, we note that SCC 30.74.010(2) states that "Any person may propose amendments to the comprehensive plan and implementing development regulations adopted under the GMA." Subsection (j) specifically lists zoning designations as among the appropriate proposed amendments.

Thank you for your consideration of our docket request. We look forward to your deliberations this Tuesday and to your recommendation to the County Council.

Sincerely,



Gary D. Huff

cc: Steve Skorney, PDS
Steven D. Farkas, Vice President and General Counsel, Paramount Petroleum Corp.
Dennis L. Derickson, David Evans and Associates, Inc.
Jack Molver, David Evans and Associates, Inc.
Steve Ohlenkamp, The Communication Group
Douglas A. Luetjen, Counsel for Paramount of Washington, LLC

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Please reply to Seattle Office

Gary D. Huff
(206) 224-8024
ghuff@karrtuttle.com

Via Electronic Mail and U. S. Mail

March 23, 2009

Planning and Development Services
Attn: Steve Skorney
Snohomish County
3000 Rockefeller Avenue, M/S 604
Everett, WA 98201

Re: Point Wells Docket XIII Application
Applicant's Comments re February, 2009 Draft SEIS
SW: 41 (Infill)

Dear Steve:

Here are Paramount's comments regarding the February, 2009 Draft SEIS. We look forward to taking the next steps to bring this matter before the Council.

Thanks to you, your staff and ICF Jones & Stokes for your efforts.

Sincerely,

Gary D. Huff

cc: Steven D. Farkas, Vice President and General Counsel, Paramount Petroleum Corp.
Dennis L. Derickson, David Evans and Associates, Inc.
Jack Molver, David Evans and Associates, Inc.
Steve Ohlenkamp, The Communication Group
Douglas A. Luetjen, Counsel for Paramount of Washington, LLC
Mark Wells, Environmental Manager, Paramount of Washington LLC
Steve Hoffman, Hart Crowser

POINT WELLS DOCKET APPLICATION – February 2009 SEIS

SW: 41 (Infill)

Applicant Comments

March 23, 2009

The following are comments submitted on behalf of Paramount of Washington, LLC regarding the draft Supplemental Environmental Impact Statement prepared by ICF Jones & Stokes dated February, 2009 (the "SEIS"). We further incorporate previously submitted SEIS comments, including the correspondence dated Feb. 27, 2009 from Gary Huff, Paramount's land use counsel, which explained differences in the evolving project description between the original Docket XII application and that used in this SEIS.

1 ↑ Paramount would first like to express its appreciation to PDS staff and ICF Jones & Stokes for their efforts in creating this document. We recognize that undertaking environmental review of an as yet undefined project is not an easy task. As the project proponent, we understand that SEPA review at the project stage will be much more detailed and will more completely address the public's reasonable concerns. We hope that those concerned with a perceived lack of project level detail will similarly keep this in mind.

Paramount is also supportive of the companion policy amendments proposed by PDS and now unanimously supported by the Planning Commission. These amendments provide helpful clarifications and remove inconsistencies in the existing policies. Our comments below will nonetheless address SEIS language regarding consistency with current plan language.

Finally, we appreciate the sentiments expressed by several members of the Planning Commission in voicing their support for Paramount's Docket request. Commissioner Miller was correct in noting that the future of Point Wells has been the topic of too many discussions over too many decades. As eloquently stated by Commissioners Day and Hambelton, implementation of Paramount's docket request will provide the certainty to Paramount to allow us to proceed with our planning for site remediation and project level planning.

With respect to the SEIS, we comment as follows:

Section 3.1.2 Soil and Groundwater Contamination.

2 ↑ No Action Alternative. Please eliminate the last sentence of the first paragraph on page 3.1-9. The asphalt plant has never been shutdown. Therefore, there would be no need to re-start plant operations.

3 ↑ Mitigation Measures and Significant Unavoidable Adverse Impacts. At page 3.1-9, the SEIS identifies the following two Significant Unavoidable Adverse Impacts (SUAIs) involving soil and groundwater contamination resulting from implementation of the Proposed Action:

1. Significant potential for soil vapor emanating from subsurface contamination to concentrate over time thereby creating 'pockets' of trapped vapor contamination.

2. Institutional Controls will likely be required to prevent future use of site groundwater for drinking water or irrigation purposes.
3. It is the opinion of both Paramount's environmental consultant and in-house environmental manager that there will be no soil vapor or groundwater institutional controls SUAIs associated with the Proposed Action. Though the Mitigation Measures listed in this section are not inappropriate, they are incomplete. Implementation of the Proposed Action will necessarily include remediation of the soil and groundwater contamination at the site. This will be conducted under the direction of the Department of Ecology ("Ecology"). Cleanup or other mitigation measures will be sufficient to meet State requirements that allow residential and commercial uses of the site under the Proposed Action.

We request that the Mitigation Measures portion of this section state that this clean up and/or other required mitigation measures will be implemented to prevent the intrusion of any vapors that might pose a threat to human health or the environment. The soil and groundwater cleanup will remove the sources (both from soil and groundwater) of the volatile compounds that can form soil vapor. Therefore, the potential for release of soil vapors should be eliminated. In the event that these vapor sources cannot be removed, then Ecology will require that vapor protection measures be added to the buildings to prevent the intrusion of vapors to protect human health. Once these additional mitigation measures are added, the soil vapor SUAI will no longer apply to the Proposed Action.

3
cont.

As for the groundwater institutional controls SUAI, Ecology has already agreed that the groundwater at the site is not suitable for drinking water. The Site Hazard Assessment score for the site was reduced from a "1" to a "3" by Ecology for just this reason. Once the site cleanup is completed and unrestricted land use standards are met, then the shallow aquifer would theoretically be suitable for drinking or irrigation water use. However, the aquifer has never been a suitable source for either beneficial use because it cannot provide sufficient quantities of water to make it a reliable source of drinking or irrigation water. In addition, Ecology would not allow the use of the shallow aquifer for these purposes due to the salt water intrusion that would occur from the immediately adjacent Puget Sound waters. Therefore, this SUAI is also not applicable to the Proposed Action.

We request that this section be revised as neither of the listed SUAI's represents unavoidable consequences of future potential site redevelopment. In the event these suggested corrections are not incorporated into the final SEIS, then we suggest that the following corrections are necessary accurately describe the impacts of these two alternatives.

- Table 1-2 at page 1-4 clearly shows that both of these SUAIs apply equally to both the No Action Alternative and the Proposed Action. However, in the text at the end of Section 3.1.2, it states that the two proposed SAUIs are associated only with the Proposed Action. The text should be revised to be consistent with the table.
- This same section indicates that soil and groundwater remediation and characterization activities will continue under Ecology oversight for both the Proposed Action (PA) and the No Action Alternative (NAA). This is a true statement with respect to the NAA. However, as for the PA, the section should state that Ecology will require the cleanup and/or the implementation of vapor protection measures at the site before the actual residential and commercial use of the site can occur.

Section 3.4.2 Impact Analysis and Section 3.5.1 Wildlife.

4

In the first paragraph of Section 3.4.2 and in the third paragraph of Section 3.5.1 on page 3.5-4, please revise the wording to state that under the Proposed Action, the risk of an oil spill associated with the transfer of petroleum products would be “eliminated” rather than “reduced.”

Section 3.11 Transportation.

5

It was not surprising to the Paramount project team that much of the recent testimony before the Planning Commission was traffic-related. The SEIS traffic analysis is based on an assumption (for planning purposes only) that Paramount’s eventual project will contain 3,500 units. Thus, the analysis addresses the “worst case” traffic scenario which at present is not tied in any way to an actual project proposal. As we have repeatedly emphasized, no density determination has as yet been made. Regardless, the unmistakable conclusion of the SEIS traffic analysis is that traffic impacts from a 3,500 unit project, even without transit or rail-related strategies, can and will be mitigated and acceptable levels of service maintained. The SEIS confirms that traffic mitigation can be successfully accomplished, even at high densities. Once project parameters and density are finalized, Paramount will welcome a more detailed traffic analysis and impact mitigation determination in an effort both to allay neighborhood concerns and ensure project viability.

We note that in the draft SEIS does not thoroughly address the use of transit as a means to reduce traffic volume. We acknowledge that this approach was appropriate for a programmatic analysis. At the time of actual development review, enhanced transit, rail and other demand management proposals will be offered by Paramount and will more thoroughly reviewed in the project EIS .

Section 3.13 Land and Shoreline Use Patterns.

6

Section 3.13.1 Surrounding Area Shoreline Designations, Impact Analysis, Indirect Impacts. At page 3.13-9, the statement is made that “Loss of this waterfront industrial property could potentially create additional demand for such facilities elsewhere, such as in the Urban shoreline zone of nearby Shoreline.” We believe that this statement would be more accurate and appropriate if modified as follows: “Loss of this waterfront industrial property could potentially create additional demand for such facilities elsewhere in the region. The combination of steep bluffs, extensive intertidal critical areas and a predominant land use pattern of valuable single family residences make it highly unlikely that any waterfront within the City of Shoreline could be feasibly converted to such an industrial use.

Section 3.14 Relationship to Plans and Policies.

7

Section 3.14.3 Affected Plans and Policies and Consistency Analysis. As mentioned above, Paramount supports the companion policy changes recently endorsed by the Planning Commission. The SEIS, however, also appropriately addresses consistency with current policies. We believe the consistency discussion at page 3.14-6 regarding LU Policy 5.B.12 should be expanded to reinforce the fact that the existing policy is both ambiguous and at odds with common practice and the manner in which the Growth Management Act requires changes to comprehensive plans be made. Thus, it is difficult at best to address consistency with such language. We suggest that the consistency language reflect the fact that while the Proposed Action may be inconsistent with the literal language of Policy 5.B.12, it is nonetheless consistent with the GMA and the standard manner in which such amendments are to be made.

Section 3.14.3 Affected Plans and Policies--Town of Woodway: On pages 3.14-11 and 3.14-12, the Consistency response regarding Woodway's Point Wells Subarea Plan includes the following statement which itself quotes from the subarea plan text: "However, the preferred alternative for the area 'reflects the property owner's desire to maintain the existing industrial use as the planned future use.'" This statement is incomplete and misleading. This statement should either be deleted in the FEIS or amended to reflect the fact that this statement was made in 2004 by a previous owner of the subject property prior its the sale of the property to Paramount.

8

PLANNING COMMISSION EXHIBIT # 10
File Docket XIII Batch 2


Evans, Sally

From: Douglas A. Luetjen [dluetjen@karrtuttle.com]
Sent: Friday, February 27, 2009 4:59 PM
To: Evans, Sally
Cc: Skorney, Steve; Steve Farkas (E-mail); Mark Wells (E-mail); Gary Huff; Dennis Derickson @ DEA (E-mail); Jack Molver @ DEA - Everett (E-mail); Steve Ohlenkamp (E-mail)
Subject: Paramount Docket XIII Application - Testimony Summary
Attachments: SFX6754[Unsaved].pdf

Ms. Evans--Please accept this summary of the recent Planning Commission testimony regarding Paramount of Washington's pending Docket XIII application. Thank you.

Douglas A. Luetjen
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Seattle, Washington 98101
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main 206-223-1313
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**Paramount Petroleum Corporation
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Seattle, WA 98177
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February 27, 2009

Snohomish County Planning Commission
3000 Rockefeller Avenue, M/S #609
Everett, WA 98201

Re: Comprehensive Plan Amendment Docketing Request - Docket XIII File I.D. #SW 41
Paramount of Washington, LLC - Point Wells Property
For Mixed Use/Urban Center Designation and Redevelopment

The following is a written summary of the testimony presented on behalf of Paramount of Washington, LLC ("Paramount") to the Snohomish County Planning Commission at its February 24, 2009 hearing regarding the Docket XIII request for potential amendments to the County's Comprehensive Plan. Three representatives for Paramount appeared at the hearing to testify regarding its docketing application for a comprehensive plan amendment and rezone.

**Gary Huff
Land Use Counsel
Karr Tuttle Campbell**

Paramount is pleased to introduce its project team. In attendance tonight is Paramount's Vice President and General Counsel, Steve Farkas. Also in attendance is Denny Derickson from the Everett office of David Evans and Associates. Denny will discuss in more detail Paramount's project goals and its request for a change to Paramount's comp plan designations from Urban Industrial to Urban Center and its zoning designation from Heavy Industrial to Planned Community Business. Mark Wells, Paramount's Environmental Manager, will then address the environmental status and planned clean-up of the site. Also here tonight are Doug Luetjen, Paramount's outside corporate counsel, and Steve Ohlenkamp, Paramount's public affairs advisor.

1 The first issue that we will address relates to the preparation and adoption by Paramount of a specific plan for the development of the site. The design and parameters of the actual project will be the result of the code-dictated planning process. Paramount intends to commence the preparation of a specific plan for the development of the site as soon as the appropriate land use designations are in place. This process will include input and participation by the neighboring communities. It should be noted that no specific development plan for the site has been adopted or approved by Paramount at this time.

Paramount is excited about the opportunities that it will have once the new comp plan and zoning designations are in place, allowing for a planned urban center mixed use development. These designations are consistent with language in the current comp plan policies which states that Point Wells should be considered for urban center designation.

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Once comp plan and zoning changes are approved, Paramount will proceed to complete its development team with the identification of a leading architectural firm and will then commence the process of undertaking the procedures set forth in the Urban Center Demonstration Program ordinance, to create a showplace, environmentally responsible, mixed use community with enhanced public access to Puget Sound.

We understand from county staff that one of the criticisms of the current UC DP process is that developers too often meet with community representatives with near-final plans in hand, instead of involving the community during the design phase. Paramount's approach will be to engage the neighboring communities and undertake a good faith effort to achieve a project design that meets both Paramount's and the neighboring communities' objectives.

2

The UC DP process will then lead to the design of a unique site-specific proposal with eventual project applications and attendant environmental review, including a thorough analysis of traffic issues and appropriate mitigation. We understand that there is great concern, particularly within the City of Shoreline, that their streets will be adversely impacted by the traffic associated with this project. We fully comprehend the fact that Paramount will be required to adequately mitigate the impacts of any future development and that it will not be allowed to undertake a project which will overburden transportation infrastructure. Road capacity obviously will be a critical component in our planning and in our interactions with the neighboring communities.

3

At this stage of the process a critical point must be made regarding the density information contained in the draft SEIS. This report contains an assumption that the project may eventually include 3,500 units. This number, rather than the original application's density estimates, were included in the SEIS at Paramount's request so that the SEIS would cover a broader range of development scenarios. Paramount did not want to appear disingenuous if it later decided to propose a project with higher density than as originally submitted. Paramount concluded that the most honest approach was to include a number in the SEIS such that the SEPA analysis would be applicable to a wider range of alternatives. Please note, Paramount has not made any decision on the project's density. Rather, Paramount has directed its project team to explore the full range of density alternatives and to ensure that the County's SEIS report was consistent with this broader approach.

4

Finally, we understand that Sound Transit has interest in locating a future station in the Edmonds/Richmond Beach area. Depending on the final decision regarding density, the best location for that station may well be at Point Wells. If so, Paramount is committed to giving considerable consideration to this unique opportunity. At a minimum, Paramount anticipates that a transit center will be included in the project plans.

Dennis Derickson, AICP
Senior Associate
David Evans and Associates, Inc.

REQUEST FOR MIXED USE/URBAN CENTER DESIGNATION

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The goal of this requested designation is to enable the future development of an outstanding pedestrian oriented, mixed use community that incorporates extensive public amenities and environmental restoration elements. The site's size, location and configuration,

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cont.

along with its single ownership and unsurpassed waterfront location make it uniquely suitable for mixed use redevelopment. This form of redevelopment will also allow the site's more than 3,500 lineal feet of Puget Sound shoreline and sandy beaches to be made available for public use and enjoyment for the first time in nearly 100 years.

Extensive outreach to the surrounding communities and neighborhoods will also play a vital role in the detailed project design and approval process which will be used to transform this property into a remarkable pedestrian-oriented community.

CONSISTENCY WITH COMPREHENSIVE PLAN POLICIES

6

The documentation we included in Paramount's docket application confirms full compliance with the County's comprehensive plan urban center siting policies. This includes implementation of land use policy LU 5.B.12 which specifically supports redesignation of Point Wells for mixed use development. The Planning and Development Services staff report provided to you recommending approval of this application also documents in detail its consistency with the County's comprehensive plan and all six of the docketing criteria contained in SCC 30.74.060. The proposal is also consistent with the Town of Woodway and City of Shoreline comprehensive plans. Both plans recommend that the site be redeveloped for pedestrian oriented mixed use.

EXPERIENCE WITH URBAN CENTERS

7

David Evans and Associates has proven experience working closely with local communities to successfully design and permit major waterfront urban center projects, such as the Port of Everett's Port Gardner Wharf project. We are part of the project team for Paramount's application that includes the expertise needed to achieve a high level of environmental compliance, including complete site contamination cleanup and implementation of major new ecological restoration projects.

PUBLIC RECREATION BENEFITS

The detailed project design for the site's mixed use redevelopment will be created through an interactive process involving the surrounding communities after its redesignation and rezoning. However, any design option that is ultimately approved and constructed is certain to include high quality waterfront parks and other public open space amenities. Full public access to the site's beautiful sandy beaches will also be provided. An extensive new on-site public walkway system with off-site extensions into the surrounding community will also be included as part of the project. In addition, a new auto and pedestrian bridge over the mainline railroad is expected to be constructed.

CONTAMINATION CLEANUP FOR ENTIRE SITE

8

In his testimony Mark Wells will explain why the proposed mixed use redevelopment of this contaminated site will provide the most timely and effective means for ensuring its complete cleanup. However, the property's current and future commercial use involving petroleum products only requires on-site containment and base level clean-up of these contaminants – not complete site cleanup. For this reason, private sector mixed use redevelopment is the most feasible method to achieve the highest level of complete site cleanup. This approach to site clean-up through privately funded redevelopment also avoids the need for use of public funds

8
cont. | for site cleanup along with the uncertainties and extensive delays likely in obtaining such funding.

MAJOR ECOLOGICAL RESTORATION BENEFITS

9 | Outside of intertidal areas the shoreline edges and developable portions of the site currently have very little beneficial riparian habitat. However, experienced biologists have confirmed that this site has great potential to provide several forms of ecological restoration which could be very beneficial to regional Puget Sound and salmon recovery efforts. These potential restoration options include creation of a pocket estuary, beach nourishment, eelgrass bed enhancement and salmon friendly shoreline edge modifications. However, the ability to implement ecological restoration of the site at a meaningful level is directly linked to its redesignation for urban center based mixed use redevelopment.

LARGE-SCALE SUSTAINABLE DEVELOPMENT OPPORTUNITY

10 | The requested redesignation provides a unique opportunity to incorporate a variety of sustainable development features into a large-scale, mixed use redevelopment project.

The size, density and mixed use configuration of the development possible by urban center redesignation will also be large enough to support provision of expanded public transit service that will also benefit the surrounding communities. In addition to expanded bus service, this could include potential construction of a new commuter rail station on or near the site.

Mark Wells, P.E.
Northwest Environmental Manager
Paramount Petroleum Corporation

11 | Changing the Point Wells property zoning designation from heavy industrial use to a mixed use urban center will be very positive from an environmental perspective. In my capacity as Paramount's Northwest Environmental Manager, I oversee Paramount's ongoing compliance with federal, state and local environmental laws and regulations at our western terminals including the Richmond Beach Terminal at Point Wells.

We currently conduct two primary activities at the Point Wells property:

- In the northern section of the property we operate an asphalt plant that processes and distributes paving, roofing, and other asphalt products.
- Under a contract agreement between Paramount and Tesoro Refining and Marketing, Tesoro leases several tanks located in the central portion of the Point Wells property for storage of marine fuel oils. As part of this terminalling operation, Tesoro offloads fuel from its ships and then loads fuel onto fuel barges which serve the local commercial marine community.

Although Paramount has only owned this facility since March 2005, petroleum storage and distribution operations have been conducted at the Point Wells location for almost 100 years. As you would expect, we have identified areas of petroleum-impacted soil and groundwater throughout the site.

Our current environmental efforts include monitoring, containment, and remediation to industrial standards applicable to ongoing petroleum operations. However, our ability to clean-up the site is severely limited by the existence of several buildings, over 80 tanks, thousands of feet of pipeline and the presence of the King County Brightwater project in the southern portion of our property.

If the County rezones this property to allow development of a mixed use urban center, and if we receive all required permits to develop the property, it would then be economically viable to begin demolition of the structures and restoration of the site. We believe that the property can be effectively cleaned-up to unrestricted land use standards through a combination of on-site and off-site treatment and disposal options.

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To this end, Paramount has employed the services of a local environmental engineering firm to assist us in the development of a comprehensive environmental remediation plan. Concurrent with the development of this plan, we will work with the Washington Department of Ecology to develop cleanup goals and standards.

If the rezone and necessary permits are granted, we envision demolishing the existing structures and cleaning up the site in phases. Assuming demolition and site clean-up go well, portions of the property may be available to begin development within one to two years after we receive all project approvals, and the entire property should be available for development within three to six years. We estimate that total clean-up costs will range between 20 to 30 million dollars.

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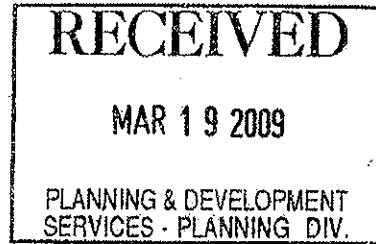
It is important to understand that our cleanup standards for a mixed use urban center will be far more stringent and protective of the environment than the standards that we must currently meet as an ongoing industrial facility. And equally important, development of the mixed use urban center will provide the private funding required to undertake a high level of cleanup of the Point Wells property.

14

Also, as previously mentioned by Denny Derickson, due to the property's location on Puget Sound, we will have the opportunity to include some beneficial ecological restoration options in the project.

For these reasons, Paramount encourages the Commission to approve the change of the Point Wells property designations from heavy industrial use to a mixed use urban center.

Thank you for your consideration of Paramount's rezone application.



March 14, 2009

Gary Reiersgard
 PO Box 702
 Lake Stevens, WA
 98258

Snohomish County
 Planning & Development Services M/S #604
 c/o Steve Skorney
 3000 Rockefeller Avenue
 Everett, WA 98201-4201

Subject: Comments on DSEIS for Docket XIII -- Paramount of Washington LLC
 Proposal (comprehensive plan amendment and rezone)

Dear Mr. Skorney:

1

Thank you for the opportunity to review the above referenced DSEIS. My specific comments are contained in Attachments "A" and "B". I have found the DSEIS inadequate in several areas, but particularly deficient in its analysis of affected plans and policies. It is unfortunate that such a large proposal that the county has identified as a "nonproject" action, has received only minimal evaluation relative to consistency with applicable policies. If the purpose of the DSEIS is to provide greater predictability and more efficiency for later project review, the EIS must provide an "adequate" analysis at this stage of review. The proposal now planned for this site must also include the effects on future planning in both the City of Shoreline and City of Woodway, as well as on affected transit systems.

I hope my comments can help in preparing a FSEIS that more closely meets the requirements of SEPA, and provides useful, appropriate and pertinent information for decision makers. Thank you for your consideration.

Sincerely,


 Gary Reiersgard

cc: City of Woodway
 City of Shoreline
 City of Mukilteo
 Port of Edmonds
 Richmond Beach Community Association
 Sound Transit

ATTACHMENT A

Comments on DSEIS for docket item SW 41 – Paramount Inc. Prepared by Gary Reiersgard

1. SCOPING NOTICE

1a

The notice of determination of significance and scoping that was issued by PDS in 2007 for this SDEIS did not include the PCB rezone action. Why not? Was the notice re-issued to reflect the correct scope of the proposal?

2. PROPOSED ACTION

2a

a. I have a concern that this proposal, submitted and evaluated as a nonproject action, is in fact both a nonproject and project action under SEPA. A zoning change requested by a private applicant that requires site specific development information clearly falls into the "project" category.

2b

b. I find it odd that the DSEIS at 2.1.5 (Nonproject Environmental Analysis section) explains that the EIS provides a qualitative analysis of the impacts since the proposal is a nonproject action. However, there is no mention of the rezone component of the proposal in this section. Is the rezone request on a specific site a nonproject action pursuant to WAC 197-11-704?

2c

c. The DSEIS is not consistent in its description of the "proposal". On page 2-6, section 2.2.3 lists the docket proposal as only a comprehensive plan amendment, but on page 2-8, the requested actions are both the plan amendment and rezone. The Summary Table 1-2 only acknowledges a plan amendment. These inconsistencies do nothing but create confusion and need to be fixed throughout the document.

3. EIS FORMAT AND SUMMARY DEFICIENCIES:

3a

a. Significant Unavoidable Adverse Impacts. WAC 197-11-440(4) requires that a proposal's identified significant adverse impacts be listed in the Summary section of the EIS. Section 1.4.3 on page 1-3 does not provide the list. PDS needs to provide the list of "significant impacts" at this location so that there is a clear distinction between these impacts and those identified in the summary that are not significant.

3b

b. The summary Table 1-2 is unclear in its characterization of the various impacts. Some elements are followed by: "There are no significant adverse impacts". Others are not. Just what is the level of impacts for the other elements if no significant adverse impacts are expected? And which elements do result in significant impacts?

ATTACHMENT A

c. If all impacts of the proposal are being mitigated to a "nonsignificant" level why was the EIS even required?

3c This distinction in impact levels has a very practical implication for decision making. In WAC 197-11-660(1)(f) - (Substantive authority and mitigation) the county is given the authority to deny a proposal using SEPA only if identified "significant adverse impacts" can not be mitigated. So decision makers need to know which impacts are "significant" and are not being mitigated. This provision does not mandate a denial, but authorizes a denial if it is appropriate.

d. In section 1.4.4 (Summary of Impacts and Mitigation Measures) readers are referred to Chapter 3 for a more comprehensive discussion of issues of interest in order to "formulate the most accurate impression of the impacts". What does this mean? Readers of the EIS should not have to formulate any impression of the impacts. The SDEIS has an obligation under the SEPA guidelines to accurately and concisely describe the impacts and characterize them as direct or indirect, significant or not significant (adverse) and whether they will be mitigated.

e. Also in Table 1-2, the mitigation measures for several elements state that no mitigation would be required. How is this conclusion reached for the Wildlife and Vegetation element and for the Air Quality element? For a proposal with little if any detailed development information, how can the county say for certain that **NO** mitigation will be required for these elements? The entire summary section should be checked against the detailed Chapter 3 impacts and mitigation statements since the summary statements of mitigation are not consistent with those of Chapter 3.

4. MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY

4 Section 1.5 of the summary section does not list the potential use of the proposal site (or part of the site) as a marina as a major issue. It seems that public testimony, particularly from several interested agencies has raised the marina issue to the level of a major issue that should be listed here. In addition county's SMMP policies seem to give priority to shoreline related uses. Is this not correct?

5. FINAL DOCKET XIII AND PROPOSAL EVALUATION PROCESS

5 Section 2.1.2 summarizes the docket process for the proposal, but does not explain just what development path/process the proposal intends to follow to obtain final development approval. Shouldn't the public be advised as to just what is the development path that is required for the proposal, particularly if this

ATTACHMENT A

is just a first nonproject step, and technically a phased environmental review under SEPA?

5a Is the proposal moving ahead using the current Urban Center Demonstration policies and code requirements? Or will the proposal use the new Urban Center GPP policies now being considered for adoption, and a new Urban Center zone now being drafted by PDS? I have already heard PDS staff justifying proposal compliance with docket criteria by using the draft GPP policies. If the new policies are to be used, they must be included in the DSEIS and a consistency analysis performed.

6. PROJECT OR NONPROJECT ENVIRONMENTAL ANALYSIS

6 As was noted in 2.a above, I have a concern that this proposal as submitted is not solely a nonproject action as defined under SEPA. Section 2.1.5 states that the proposal is a "nonproject" proposal. Since the proposal includes a zoning change (PCB) requested by a private applicant on a specific development site, it appears that the proposal falls within the "project" category. Why is this particular rezone request not being treated as a "project" action?

7. IMPACT ANALYSIS

7a a. Land Use: What are the impacts of the elimination of the current use of a deep water pier on the site and its potential for future use at the site? What are the regional impacts of not establishing a marina at the proposal site?

7b b. Land Use: What are the impacts on neighboring jurisdictions land use plans and future planning efforts if the proposal is approved?

7c c. Transportation: What are the impacts of the proposal not complying with the applicable County GPP Transportation policies cited in Attachment B, and in particular the proposal's inconsistency with the policy direction to establish multi-modal transportation corridors and service between urban centers?

8. RELATIONSHIP TO PLANS AND REGULATIONS

a. Consistency with County Shoreline Management Master Program policies and regulations

8a(i) (i) In Section 3.14.1, the DSEIS identifies only one SMMP element as applicable to the proposal: the Urban Environment Designation criteria. The site is already designated Urban by the SMMP. It is fairly obvious that this designation would continue to be valid for the high intensity commercial and residential

ATTACHMENT A

8a(i)
cont.

development anticipated for the proposal. However, the DSEIS fails to list and provide a consistency evaluation of the management policies that apply to the Urban Environment. These are much more pertinent and clearly more applicable to the proposal than the environmental designation criteria. Why were these policies not analyzed in the SDEIS?

It appears that these 10 policies emphasize and give priority to "water dependent use" in the urban environment. Is the proposal consistent with each of these policies?

8a(ii)

(ii) The proposal site is unique in that is located on a shoreline of statewide significance, and is therefore subject to additional use and development principles found in Section H of the SMMP. The DSEIS fails to even mention the shoreline of state-wide significance and these principles. The DSEIS has described the proposal (Urban Center with both commercial and residential components using the PCB zone) as change in land use on the proposal site and as a worst-case development scenario. Even though there is no specific substantial development permit requested at this time, the basic land use policies of the SMMP must be evaluated and applied to the proposal, including those relevant to the use of shorelines of state-wide significance. Does the DSEIS at any location, identify the shoreline at the proposal site as a shoreline of state-wide significance?

Please explain why the DSEIS does not include a consistency analysis of the principles outlined Section H of the SMMP. As the DSEIS tries to point out at various locations, a nonproject proposal is to be reviewed against pertinent policies. It seems that the principles and guidelines of Section H emphasize a focus on obtaining input and recommendations from all local, regional and state agencies, as well as interest groups in determining what appropriate shoreline use or uses can be placed on the proposal site, together with an appropriate level of public access and recreation use, including shoreline enhancement. A significant proposal such as the Paramount proposal should at a minimum, acknowledge that these principles exist, and determine whether the character of their development will be consistent with these principles. Please attach Section H as an appendix to the FSEIS and explain the proposal's consistency with the policies.

8a(iii)

(iii) The County SMMP includes master program elements goals and general development policies (Section D). Since they form the foundation and framework for the SMMP as a whole, they also should be cited as applicable to this proposal. The DSEIS does not reference these policies. The land use preferences contained in these elements and policies are germane to the current proposal, even in the absence of a detailed development plan for the proposal site. The DSEIS should evaluate these policies and determine which are particularly relevant at this stage of proposal review, and which will be more appropriately addressed at the next stage of review.

ATTACHMENT A

b. Consistency with County GMA Comprehensive Plan

8b(i) (i) The DSEIS claims the proposal is a nonproject proposal. Therefore, it follows that the focus of the EIS should be on the proposal's compliance or noncompliance with **ALL** applicable policies and regulations that are relevant to the evaluation of the GPP plan amendment and PCB rezone request. Is this not correct? I have found numerous GPP policies relevant to the proposal that are not even mentioned in the DSEIS. Each is listed on Attachment "B", followed by specific comments. The FSEIS is not adequate without a consistency analysis of these policies.

8b(ii) (ii) How is the proposal consistent with **LU Policy 3.A.3**? There is no mention of commuter rail as an acceptable regional high capacity transit route in the policy. Sound transit has no immediate or long term plans for a transit station at the location of the proposal site.

8b(iii) (iii) How is the proposal consistent with **LU Policy 3.A.5**? This policy identifies **ONLY** those sites that are eligible for the UC designation. The proposal site is not listed in this policy. Amending the FLUM to add an additional urban center designation does not amend this policy. If this policy can be amended every time a new proposal comes through the door, then the policy is not being used as it was intended. Many other policies in the GPP infer that Urban Center designations are to be placed on the FLUM during a comprehensive review of the GPP during a major planning cycle review when regional center issues can be adequately evaluated.

8b(iv) (iv) How is the proposal consistent with **LU Policy 5.B.12**? This policy appears to be demanding that site specific permitting considerations, including development impacts be part of any re-designation process. I don't buy the county's argument that there is difficulty in providing the information for a "programmatic EIS". Here is a policy begging site specific development information, even as part of a plan designation change. The DSEIS suggests that the proposal "may" not be consistent with this policy. I suggest that it "is" not consistent with this policy.

c. Consistency with applicable county regulations

8c(i) (i) Why doesn't the DSEIS include the consistency analysis for the regulations applicable to the proposal at the nonproject review level, specifically the final docket approval criteria contained in SCC 30.74.060? These criteria must be met in order for the proposal to be approved and are specifically applicable to the proposal.

8c(ii) (ii) The proposal's compliance with the final docket approval criteria is questionable if the consistency statements already provided in the DSEIS are

ATTACHMENT A

8c(ii)
cont.

brought into question individually. In addition, how is the proposal compliant with final **docket criterion (f)**? This criterion requires that new information be available today that was not available in 2005 that changes the underlying assumptions of the 2005 GPP, and supports the proposal? The fact that someone wants to develop a particular property does not change the underlying assumptions in the current GPP. PDS has the responsibility to explain what assumptions of the current plan are no longer valid? How have they changed with new information?

d. Consistency with County Wide Planning Policies

8d(i)

(i) The DSEIS fails to mention Urban Growth Area policies **UG-5** and **UG-6**, both relevant to the current proposal.

(ii) **UG-5** states: "Ensure the siting and development of urban growth areas support pedestrian, bicycle and transit compatible design." Is the proposal consistent with this policy?

(iii) **UG-6** states: "Coordinate urban center designation with the appropriate transit agencies to achieve compatibility of land use and transportation objectives within urban growth areas." Is the proposal consistent with this policy? What type of coordination has occurred with transit agencies, including Sound Transit that will insure compatibility of county land use and transportation objectives?

e. Consistency with the City of Woodway policies

8e(i)

(i) How is the proposal consistent with **LUG-9**? Again, here is a city policy that appears to apply to the major plan update process where the county can collectively implement a land use plan with the City of Woodway. This is not happening using the docket process. Preparing an EIS and allowing comments is not working with appropriate jurisdiction to collectively implement a land use plan.

8e(ii)

(ii) How is the proposal consistent with **LUG-18**? Why hasn't the county, over the last 1 and ½ years since this proposal has been known, engaged the City of Woodway to develop specific policies pertaining to the Point Wells property? This element again points out the flaw of using the docket process to evaluate an Urban Center proposal that requires interjurisdictional coordination and evaluation on a regional level.

8e(iii)

(iii) How is the proposal consistent with **LUG-19** if an interlocal agreement has not been prepared with the City of Woodway? As was pointed out above for **LUG-18**, the proposal is both premature and being considered via the wrong review and approval process.

ATTACHMENT A

f. Consistency with the City of Shoreline policies

8f(i)

(i) How is the proposal consistent with T25? Since no transit station is proposed by Sound Transit at the Point Wells site, little if any work has been done between the City of Shoreline and Sound Transit to develop such a rail stop. It appears that the design of a rail stop at this location is not even scheduled.

9. SEGMENTATION OF A RELATED PROPOSED ACTIONS:

9a

A proposal to amend GPP Urban Centers policies is now being considered as a stand alone docket item, even though it is significantly related to the Paramount proposal. It even references the Paramount site in a proposed amended policy. SEPA requires that proposals be properly defined and scoped so that any proposal or parts of proposals that are closely related to each other be evaluated "in the same environmental document". This requirement is further substantiated in WAC 197-11-792 (Scope), where the range of proposed actions to be analyzed in an environmental document is stated. Here actions may be single or connected. Connected means proposals or parts of proposals which are closely related. This requirement in WAC 197-11-060(3)(b) has not been met with the DSEIS for the current Paramount proposal and the environmental review conducted for the proposed amendments to Urban Centers plan policies. The DSEIS should have included a SEPA evaluation of the proposed GPP Urban Center amendments. Do you agree? If not, please explain.

9b

On this same topic, PDS is in the process of preparing a new implementing zone (Urban Center zone) for the Urban Center plan designation. This new regulation that will be part of SCC Title 30 (UDC), and will specifically regulate how development is to occur on properties designated UC by the comprehensive plan. This proposal also should be part of this single SEPA evaluation and included in this EIS. It is not appropriate for the County to continue to piecemeal significant policy and regulatory proposals so that decision makers only see a part of the whole at one time, and make decisions lacking the full scope of a proposal and its consequences. It's time to throw out the excuse of having to move something forward in part, because it's needed quickly or it won't make the current docket cycle, and then deal with a related or more detailed part later. This defies common sense, is a detriment to good decision making, and is a disservice to all interested stakeholders.

9. ALTERNATIVES

10a

The DSEIS does not include any specific alternative land use for the site, other than the "No Action" alternative. WAC 197-11-442 (Contents of EIS on nonproject proposals) at subsection (2) states that "Alternatives should be emphasized". Alternatives are not being emphasized in this EIS.

ATTACHMENT A

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Two primary and obvious alternatives should be included in the FSEIS. They include an alternative that is less intensive (lower environmental cost and degradation) than the current proposal, and one that includes a marina at the proposal site. Why were neither of these included in the DSEIS?

10b

In this case, a proposal site that already contains a substantial deepwater pier and dock facility should be evaluated as an alternative; either as a separate alternative, or possible major component of the proposed action. At a minimum the DSEIS should explain why the marina alternative has not been included as a "reasonable alternative" particularly in light of the development policies pertaining to the site possible use as a marina that are contained in the City of Woodway comprehensive plan and the acknowledged shortage of marinas along this shoreline of the county.

ATTACHMENT B

G. Reiersgard

The following are Snohomish County Comprehensive Plan policies that are clearly pertinent to the proposal that were not identified in the DSEIS. In addition to a DSEIS evaluation, these policies should also have been evaluated by PDS as part of their staff recommendation on this docket proposal. I have provided comments pertaining to each listed policy.

Objective LU 3.B Plan for Transit/Pedestrian Villages within Urban Centers

LU 3.B1

Transit/Pedestrian Villages are core areas within designated Urban Centers where transit-oriented development is required. Transit/Pedestrian Villages shall be designated on the FLUM. Transit/Pedestrian Villages require access to transit and will be considered for regional light rail or high-capacity express bus service.

LU 3.B.2

Transit/Pedestrian Villages will be located within on-fourth mile walking distance of a transit center or park-and-ride lot or on a bus route with at least one stop within the Village.

LU 3.B.3

Minimum densities within Transit/Pedestrian Villages shall be at least 20 dwelling units per acre with maximum densities determined through more detailed planning.

LU 3.B.4

The county shall develop and adopt a detailed master plan for each Transit/Pedestrian Village as an amendment to the GPP. State Environmental Policy Act review shall be conducted for each plan. The plan and planning process shall include the following elements: (see list of eleven elements in the GPP)

Comment: Since the Transit/Pedestrian Village is a sub-component of Urban Centers and appropriate as a core area when transit-oriented development is required, what evaluation has been made for the current proposal as to whether it should or should not contain a "Transit/Pedestrian Village" sub component? If the rail service to be provided for the proposal at the proposal site and is considered regional light rail service, wouldn't this urban center location be an

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ideal location for a Transit/Pedestrian Village? If so, doesn't that decision have to be made prior to an amendment to the GPP? Why aren't these policies discussed in the DSEIS?

Objective LU 3.G Investigate and develop techniques to ensure the long-term success of center development

12

LU 3.F.5

Center should be located and designed to be connected to bicycle and pedestrian trails.

Comment: *Will the proposal be consistent with this policy?*

Objective LU 3.H Encourage compatible and supporting land uses adjacent to centers and transit facilities and along transit corridors.

LU 3.H.1

The county shall encourage mixed-use development in commercial and high density residential zones when adjacent to center or transit facilities or along transit corridors.

LU 3.H.2

13

Properties adjacent to center, transit facilities or transit corridors shall provide pedestrian and bicycle connections to the center to encourage pedestrian activity and decrease auto trips.

Comment: *Even though these two policies speak to coordinating development on adjacent lands with urban center lands, how will the county provide this type of bicycle and pedestrian connection to this center proposal, particularly when adjacent properties are within other jurisdictions? These types of policies seem to beg the question that consideration of the location of new centers is more than just the center location itself, and that such consideration as an isolated docket item may not be the appropriate review and approval mechanism for a new urban center. The GPP seems to imply that new centers should be considered during a major plan update when focus on interjurisdictional coordination, together with all of these peripheral issues can be accommodated.*

14

Objective HO 1.B Ensure that a broad range of housing types is available in urban and rural areas.

HO 1.B.4

14
cont.

The county shall encourage and support the development of innovative housing types that make efficient use of the county land supply such as residential units in mixed-use developments, accessory dwelling units, cottage housing and live/work units.

Comment: *Is the proposal consistent with this policy?*

Objective HO 2.B Encourage the use of innovative urban design techniques and development standards to foster broad community acceptance of a variety of housing types affordable to all economic segments of the population.

HO 2.B.1

15

The county shall encourage a variety of housing types and densities in residential neighborhoods.

HO 2.B.2

The county shall facilitate the development of urban centers and urban villages in appropriate locations with UGAs.

Comment: *Is the proposal consistent with these policies?*

Objective TR 1.A Prepare, in cooperation with the cities, the Washington State Department of Transportation (WSDOT), regional agencies, Sound Transit, Community Transit, and Everett Transit, standards for public transportation services and facilities consistent with adopted road standards and the land use elements of the county's comprehensive plan.

16

Comment: *The DSEIS devotes almost one half of its impact analysis to potential transportation/traffic impacts of the proposal. Yet no applicable county GPP transportation policies are cited in the EIS. This seems to be a major deficiency. Why are the following transportation policies not included in the EIS? Even though many transportation/traffic development standards have been codified, some of these policies transcend specific development regulations.*

TR 1.A.1

Public transportation planning shall be integrated with land development review and the design and maintenance of public roads.

TR 1.A.2

Public transportation shall be extended throughout the urban area at a level of service appropriate to the planned form and intensity of development.

Comment: Is the proposal consistent with these policies? How?

Objective TR 1.C Establish access and on-site circulation standards to maintain the safety and integrity of the arterial roadway system.

TR 1.C.1

A countywide network of primary corridors shall be identified that provide for multi-modal transportation services between centers designated on the comprehensive plan.

Comment: How is the proposal consistent with this policy? Has the county identified primary corridors between this proposed center and other centers? If not, why not? Again, this policy implies a more regional look at transportation issues for centers, not just a single center location review.

Objective TR 2.A In cooperation with the cities, make the designated centers the focus of residential and employment growth and transportation investment in unincorporated county areas.

TR 2.A.1

Roadways serving designated centers shall be redesigned, improved, and maintained as primary corridors for multi-modal travel.

TR 2.A.2

A transit-supportive transportation system shall be provided linking designated centers.

TR 2.A.4

An interconnected system of high-occupancy vehicle (HOV) lanes and treatments shall be provided to serve the designated centers and transportation center with the urban area.

16
cont.

TR 2.A.5

A regionally coordinated system of bikeways and walkways shall be planned to the designated centers and transportation centers.

Comments: Is the proposal consistent with these policies? Focus hear again is on developing multi-modal transportation systems for centers in a comprehensive manner. How is the proposed center to be linked to other centers? How have the effected cities been involved in developing necessary transportation corridors that would serve a center? Where are the planned bikeways and walkways? How does this type of regional planning get accomplished using this very narrow docket process for approval of an urban center?

Objective TR 2.B In cooperation with the cities, promote a variety of convenient transportation services to compact and attractively designated centers.

16
cont.

TR 2.B.2

High-occupancy vehicle use and alternatives to single-occupancy vehicles shall be promoted in centers through higher density single-family and multi-family developments.

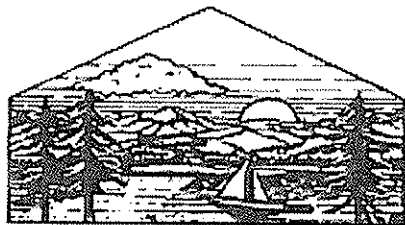
Comment: Is the proposal consistent with this policy?

Objective TR 5.D Participate with the cities, transit agencies, Sound Transit and WSDOT in a cooperative planning process for public transportation and high-capacity transit.

TR 5.D.3

Development review shall be performed with transit agency participation to ensure site plan compatibility with public transportation and other high-occupancy vehicles.

▼ *Comment: Is the proposal consistent with this policy?*



RICHMOND BEACH
COMMUNITY ASSOCIATION

P.O. Box 60186 – Richmond Beach, WA 98160-0186

February 23, 2009

Mr. Steve Skorney, Senior Planner
 Snohomish County PDS
 3000 Rockefeller Ave., M/S 604
 Everett, WA 98201-4046

Re: Draft SEIS, Final Docket XIII Comprehensive Plan Amendment – Paramount of Washington, LLC, Snohomish County, February 2009

Subject: Board of Directors, Richmond Beach Community Association,
 Letter of Comment

Dear Mr. Skorney:

Members of the Board of Directors, Richmond Beach Community Association, have recently reviewed the Draft SEIS regarding the Paramount of Washington proposal, and provide this comment letter in response. We understand that with the submittal of this document, The Richmond Beach Community Association becomes a *Party of Record* pertaining to all forthcoming public business on this matter.

The Draft SEIS concerns the application originally made by Paramount of Washington, LLC to revise land use designations as maintained by Snohomish County for 65 acres on the waterfront of the Pt. Wells property, changing the GMA Comprehensive Plan (FLUM) designation of *Urban Industrial* (UI) to *Urban Center* (UC), and to change the corresponding property zoning from *Heavy Industry* (HI) to *Planned Business Community* (PCB). As we understand, the subject property represents unincorporated property. The Draft SEIS analyzes two alternatives: (1) Proposed Action, and (2) No Action alternatives. Adoption of the docket, language meaning: the proposed action is granted by Snohomish County, would not have any direct impact on the environment so states the document, but the future development allowable under these changes would have a dramatic affect not only on the site and adjacent environs, but the community to the south through which the only existing vehicle access exists: Richmond Beach neighborhood, City of Shoreline, King County. This letter foremost addresses issues involving related impacts to the community of Richmond Beach.

2 First, we make special note that the comment period associated with this document, and as stated on page FS-1, is 45 days. However, the document was not delivered to City of Shoreline staff, and in turn ourselves, until February 9, allowing only 43 days until the stated close of the public comment window on March 23, 2009. We simply bring attention to this oversight.

3 As you know, there is only one road that provides access to the former Chevron property, currently owned and commercially operated by Paramount of Washington LLC. That road is Richmond Beach Drive NW, which runs through the neighborhood of Richmond Beach in the city of Shoreline (King County). We believe it would be premature to allow a rezone of the property without first having a comprehensive traffic study, and a subsequent transportation plan involving cooperation with the neighboring county and city, that would accommodate the additional traffic, as well as life-safety services. Richmond Beach Drive is a two-lane road, whose lanes are as narrow as 10' in many locations. In addition, many property owners (with existing buildings dating back at least to the 1890's) were allowed to build up to the street edge on both sides of Richmond Beach Drive with no space for sidewalks or amenity strips, and therefore, widening the road would significantly impact many residents, and commercial properties.

4 In addition to the anticipated consequences from increased traffic, the DSEIS document makes clear the perilous implications of remediating an industrial site that is a known holder of toxic soils. The document implies that clean up will come sooner and perhaps more comprehensively under the proposed land use action, as the site in its current form could allow an "increase in current operations" and/or new "petroleum product refining and distribution" (pg 1-5). Yet, the document fails to explain the analysis of this trade-off: how could increases in operations, or the building of new facilities at a site that is known to be contaminated be approved by Snohomish County, or be permitted to increase the impacts on the streets of a neighborhood beyond its jurisdiction? Further, the document discusses mitigation measures, but does an inadequate job in our opinion of ascribing mitigation to the various jurisdictions involved here. Are not the property's neighbors to the south entitled to call a halt to further contamination of our shoreline and the further impacts to our streets and our services. In a way of saying, our citizens consider the expectation of continued use of Richmond Beach Road for expanded development at Point Wells, either under the Approved Action or No Action alternatives as a "bridge to nowhere" scenario (road improvements alone will not make it work), and certainly unacceptable without significant qualitative and remunerative compensation to Richmond Beach, as well as other Shoreline neighborhoods. In addition, a single roadway to the exclusion of other means of ingress and egress to a community envisioned to hold as many as "3000 units" of housing, simply does not make sense. What if that single road is blocked by Act of God or otherwise?

5
6 The RBCA Board has heard from residents by way of public meetings we have conducted. Residents are most concerned by the fact that adding a mixture of traffic-intensive uses to the Pt. Wells area would significantly increase automotive trips, and further overburden this community and the under-sized roadways currently used exclusively for site ingress and egress from the site. Traffic would be especially problematic if there is no Snohomish County access.

7
8
In sum, the Richmond Beach Community Association, and its resident constituents, feel that any potential increase in use of the site must be accompanied by a fair share of the burden of the impacts to be born by the jurisdiction which entitles it (read: annexes it). Environmental protection from the toxic reality that is the existing Point Wells site is paramount, pardon the pun, and more should be done to protect adjacent residents – regardless of which “alternative” is approved by Snohomish County. Moreover, we expect that a reasonable and fair share of vehicle access must be required to come by way of Snohomish County and or the Town of Woodway, and that all emergency services would be provided by the governing jurisdiction: Snohomish County. We ask that a project built in Snohomish County not be an unfair burden to its Richmond Beach neighbors to the south.

9
Please consider our comments while studying the requested comprehensive plan and zoning changes. We also look forward to receiving regular updates about this process. Thank you for your assistance in this regard.

Sincerely,

Ed Adams, Scott Becker, Steve Kerr, Jack Malek
Members of the Board of Directors, Richmond Beach Community Association

c: Bob Olander, City Manager, Shoreline
Shoreline City Council

Linda Bentley

From: Skorney, Steve [Steve.Skorney@co.snohomish.wa.us]
Sent: Tuesday, March 10, 2009 2:48 PM
To: Linda Bentley
Subject: FW: Point Wells

Linda:

A draft SEIS comment.

Thanks

Steve

-----Original Message-----

From: Whitney Storm [mailto:whitneystorm@gmail.com]
Sent: Tuesday, March 10, 2009 2:22 PM
To: Skorney, Steve
Subject: Point Wells

Hello Mr. Skorney,

1 I am writing in regards to the development proposal at Point Wells and its environmental impact. I am concerned they are calling it a low-mid density project when it includes up to 3000 condos, a marina and only access through our small quaint town of Richmond Beach. Our roads will not support the traffic, the light will be a **major** pollutant on the Puget Sound, and our small community will lose its sense of community. The beauty of Shoreline comes from its environmental preservation and its small neighborhoods. While I understand a property owner has rights, there should be parameters and limits when it effects the community around it. A project of this scale should not be permitted.

2 The people of Richmond Beach are saddened by this proposal. Snohomish County is permitting this, yet we are the ones suffering from it. Have people not yet learned the value of protecting the land is worth more than the money it makes. I encourage you to look at the long term effects of this project and the detriment it will have on the environment and community. KEEP IT SMALL!

Whitney Storm
 Teacher
 253-720-7683
whitneystorm@gmail.com

Chapter 5. Distribution List

5.1. Federal Agencies

Federal Emergency Management Agency	U.S. Department of Housing and Urban Development
National Marine Fisheries Service	U.S. Environmental Protection Agency
U.S. Army Corps of Engineers	U.S. Fish and Wildlife Service, Region 1
U.S. Department of Agriculture, Forest Service	U.S. Natural Resources Conservation Service

5.2. State and Regional Agencies

Community Transit	Office of Archaeology and Historical Preservation
County Road Administration Board	Office of Community Development, Growth Management Program
Department of Agriculture	Office of the Governor
Department of Community, Trade and Economic Development	Parks and Recreation Commission
Department of Corrections	Puget Sound Action Team
Department of Ecology	Puget Sound Air Pollution Control Agency
Department of Fish and Wildlife	Puget Sound Regional Council

Department of General Administration	Puget Sound Water Quality Authority
Department of Health	Recreation and Conservation Office
Department of Natural Resources	Snohomish/King Environmental Alliance
Department of Social and Health Services, Land and Building Division	Snohomish County Health District
Department of Transportation	Sound Transit
Department of Transportation, Northwest Region	Utilities and Transportation Commission
Everett Transit	State Energy Office
King County Metro Transit	

5.3. Cities

City of Arlington	City of Mukilteo
City of Bothell	City of Mountlake Terrace
City of Brier	City of Monroe
City of Edmonds	City of Shoreline
City of Everett	City of Snohomish
City of Gold Bar	City of Stanwood
City of Granite Falls	City of Sultan
City of Lake Stevens	City of Woodinville
City of Lynnwood	Town of Woodway
City of Marysville	Town of Darrington
City of Mill Creek	Town of Index

5.4. School Districts

Arlington School District	Marysville School District
Darrington School District	Monroe School District

Edmonds School District #15
 Everett School District
 Granite Falls School District
 Index School District
 Lake Stevens School District
 Lakewood School District

Mukilteo School District
 Northshore School District
 Snohomish School District
 Stanwood School District
 Sultan School District

5.5. Diking Districts

Diking District 1
 Diking District 2
 Diking District 3
 Diking District 4
 Diking Improvement District #5
 Stillaguamish Flood Control District
 Drainage Improvement District #7

Lake Stevens Drainage Improvement
 District #8
 Diking District #12
 Drainage Improvement District #13
 French Slough Flood Control District
 Marshland Flood Control District
 Biringer Dike

5.6. Fire Districts and Ports

Arlington Fire Department
 Bothell Fire Department
 Darrington Ambulance
 Edmonds Fire Department
 Everett Fire Department
 Fire District 1 South County
 Fire District 10 Bothell
 Fire District 11 Silver Lakes
 Fire District 12 Marysville

Fire District 26 Gold Bar
 Fire District 27 Gedney/Hat Island
 Fire District 28 Index
 Fire District 3 Monroe
 Fire District 4 Snohomish
 Fire District 5 Sultan Fire
 Fire District 7 Clearview
 Fire District 8 Lake Stevens
 Granite Falls Fire Department

Fire District 15 Tulalip	Island County Fire District 1
Fire District 16 Lake Roesigner	Lynnwood Fire Department
Fire District 17 Granite Falls	Marysville Fire Department
Fire District 19 Silvana	Monroe Fire Department
Fire District 21 Arlington Heights	Mountlake Terrace Fire Department
Fire District 22 Getchell	Mukilteo Fire Department
Fire District 23 Robe Valley	Paine Field Fire District
Fire District 24 Darrington	Port of Edmonds
Fire District 25 Oso	Port of Everett
No. County Regional Fire Authority	Snohomish Fire Department
	Stanwood Fire Department

5.7. Neighboring Planning Departments

Chelan County Planning Department	Skagit County Planning Department
Island County Planning Department	Thurston County Development Services
King County Department of Development and Environmental Services	Whatcom County Planning and Development Services
Pierce County Planning and Land Services	

5.8. Tribes

Muckleshoot Tribes	Stillaguamish Tribe
Sauk/Suiattle Tribe	Tulalip Tribes

5.9. Utilities

Alderwood Water and Wastewater District	Ronald Wastewater District
Arlington Public Works	Puget Sound Energy
Cascade Natural Gas	Roosevelt Water Association

Comcast Cablevision	Schulter Water Association
Cross Valley Water District	Seven Lakes Water Association
Darrington Public Works	Silver Lake Water District
Everett Public Works	Sky Meadow Water Assn., Inc.
Granite Falls Public Works	Snohomish County PUD
Highland Water District.	Snohomish Public Works
King County Brightwater Project	Stanwood Public Works
Lake Stevens Sewer District	Startup Water District
Marysville Public Works	Sultan Public Works
METRO/Transit	Three Lakes Water Association
Monroe Public Works	Tulalip Utilities Authority, Districts 1 and 2
Mukilteo Water District	Wilderness Ridge Community Club Water Supply
Olympic View Water and Sewer District	Wilkshire Lane Water District
Olympus Terrace Sewer District	

5.10. News Media

Arlington Times	Seattle Post-Intelligencer
Bothell-Kenmore Reporter	Seattle Times-North Bureau
Enterprise Newspaper	Snohomish County Tribune
KRKO	The Edmonds Paper
KSER FM	The Herald
Lake Stevens Journal	Woodinville Weekly
Marysville Globe	KCPQ TV
Mill Creek Enterprise	KING TV
Monroe Monitor/Valley Times	KIRO TV
Mukilteo Beacon	KOMO TV

5.11. Libraries

Arlington Library	Langley Library
Bothell Library	Lynnwood Public Library
Brier Public Library	Marysville Public Library
Clinton Library	Mill Creek Library
Coupeville Library	Monroe Library
Darrington Library	Mountlake Terrace Library
Edmonds Public Library	Mukilteo Public Library
Everett Public Library	Oak Harbor Library
Evergreen Branch, Snohomish County Prosecuting Attorney Everett Library System	Shoreline Library
Freeland Library	Snohomish Public Library
Granite Falls Library	Sno-Isle Regional Library
Lake Stevens Library	Stanwood Library
King County Library System	Sultan Library
	Woodinville Public Library

5.12. Snohomish County Departments

Paine Field Airport	Snohomish County Medical Examiner
Snohomish County Assessor	Snohomish County Parks and Recreation Department
Snohomish County Auditor's Office	Snohomish County Planning & Development Services
Snohomish County Department of Emergency Management	Snohomish County Prosecuting Attorney
Snohomish County Executive	Snohomish County Public Works
Snohomish County Facilities Management	Snohomish County Sheriff
Snohomish County Finance Department	Snohomish County Treasurer's Office
Snohomish County Fire Marshall	Snohomish Health District

Snohomish County Hearing Examiner

5.13. Snohomish County Community Groups

Action Council for Esperance	Little Bear Creek Protective Assn
Agriculture for Tomorrow	Martha Lake Community Club
Alderwood Community Council	Martha Lake Homeowners
Arlington Heights Comm	Master Builders of King & Sno Co
Canyon Firs Homeowners Assn	McKees Evergreen Beach
Community Transit	N. Creek Rural/1000 Friends of Sc
Crestline Estates Action	Newberg Organization
DARAC	North Marysville Citizens
Econ Dev Council of Snohomish Co	Pilchuck Audubon Society
Edmonds Chamber of Commerce	Possession Bay Association
Everett Area Chamber of Commerce	Professional Consultants Sno Co
Everett Transit	Silver Lake Action Committee
Friends of Florence Acres	Sno Co Camano Board of Realtors
Futurewise	Sno/Arl Trail Coalition
Housing Auth of Sno Co	Snohomish Conservation District
Jordan Rd Citizens Group	So Co Preservation Assn
Kayak Pt Citizens Group	So County Chamber Of Commerce
Kennard Corner Homeowners	Stillaguamish Citizens Alliance
League of Women Voters	Tulalip Natural Resources
	Wandering Creek Homes

Other notification will be provided in accordance with Snohomish County Code (SCC) Chapter 23.28, Environmental Policy, Public Notice, and Commenting Procedures.

Chapter 6. References

6.1. Printed References

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6.2. Personal Communication

Beidler, Robert. Bureau Chief. Snohomish County Sheriff's Department. May 5, 2009—personal communication.

Huff, Gary. Attorney. Karr, Tuttle, Campbell. Seattle, Washington. November 25, 2008—comments on Preliminary Draft EIS.

Pearson, Scott. Deputy Chief. Snohomish County Fire District 1. April 28, 2009—personal communication.

Snohomish County Fire Marshall. General assistance line. September 22, 2008—personal communication.

Ter-Veen, William. Deputy. Technology/Background Investigator. Snohomish County Sheriff's Office. April 21, 2008—personal communication.