



*City of Shoreline*

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

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

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

General Comments

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

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

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

## Comments on the process

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

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

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

## Comment on the proposal

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

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

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

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

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

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

The other assumption in an Urban Centers designation is that an Urban Center would include a solid employment base. The SEIS assumes a base of 800 jobs, basing its assumption of 27 employees per acre on about 30 acres. We believe that a more

correct way of estimating employment is assuming that employment is a function of the retail and commercial space that is provided. Even an optimistic assumption of 4 employees per thousand square feet, 85000 square feet would result in 340 jobs, about 40% of the job total that the EIS assumes.

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

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

### Comments on the EIS

#### *There may be significant errors in the traffic analysis*

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

#### *Background Traffic Growth Estimates are High*

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

#### *Traffic Safety Mitigations are not well analyzed or defined*

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

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

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

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

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

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

*Park Issues not described in Detail*

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

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

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

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

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

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

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

Thank you for your consideration.

Sincerely,

Steven M. Cohn  
Senior Planner  
City of Shoreline