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Gary Huff
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Subject: Point Wells Submittal Drawings—Request for Clarifications

Dear Mr. Huff,

During our conversations on the Point Wells Environmental Impact Statement (EIS) work currently underway, we have discussed several issues with the project submittal sheets that will require clarification. Some issues, such as confirmation of the proposed number of units in each building, must be clarified before the Draft Environmental Impact Statement (DEIS) is issued. Clarification of other issues on the submittal sheets, e.g. addressing inconsistencies how phases are titled, do not strictly need to be clarified for the DEIS, but it would be helpful to do so now (and in any case, these must be addressed before subsequent approvals are issued, e.g. land use or construction).

Many of the requests for modified/clarified drawings date back to the April 12, 2013, Review Completion Letter from Darryl Eastin that described information required to evaluate the Point Wells proposal further (attached for reference, but without original attachments). This letter concurs with the earlier requirement and makes a series of more-detailed requests for changes in the project submittal sheets by topic in roughly descending order of priority.

Issues that must be clarified before the DEIS is issued:

1. Number of units and square footage proposed in individual buildings
2. Floor plate calculations and floor area ratios
3. Beach groins
4. Several smaller inconsistencies

Issues that should be clarified before the DEIS is issued include adding missing labels and making minor corrections.

Issues that must be clarified before the DEIS is issued

Items identified as Issue 1 to Issue 4 must be clarified before the DEIS is issued.

Issue 1: Number of Residential Units and Square Footage Proposed in Individual Buildings

Several places in the submittal drawing appear to contain conflicting information about the number of units proposed. This issue must be adequately addressed with updated drawings before the DEIS is issued. We have questions regarding all building typologies. The specific issues needing clarification vary with the towers (1.A), townhomes (1.B), and midrise buildings (1.C).

1.A Towers:

We will use three figures regarding building CV-T7 (Tower 7 in the Central Village portion of the site) to illustrate our confusion regarding unit counts in the towers.

Figure 1 is a portion of Sheet A-300 that shows a typical tower floor plan with 10 units per floor.

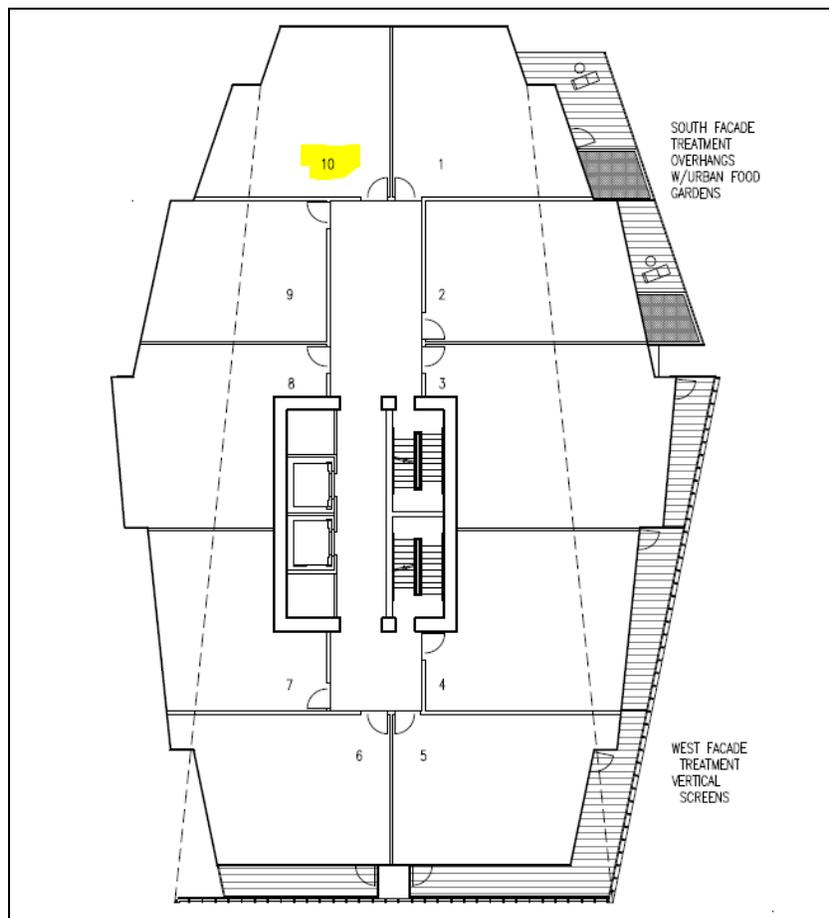


Figure 1 – Typical Tower Floor Plan

Figure 2 shows from a portion of Sheet A-102 that CV-T7 is clearly a match for the building with the typical floor plan shown in Figure 1.

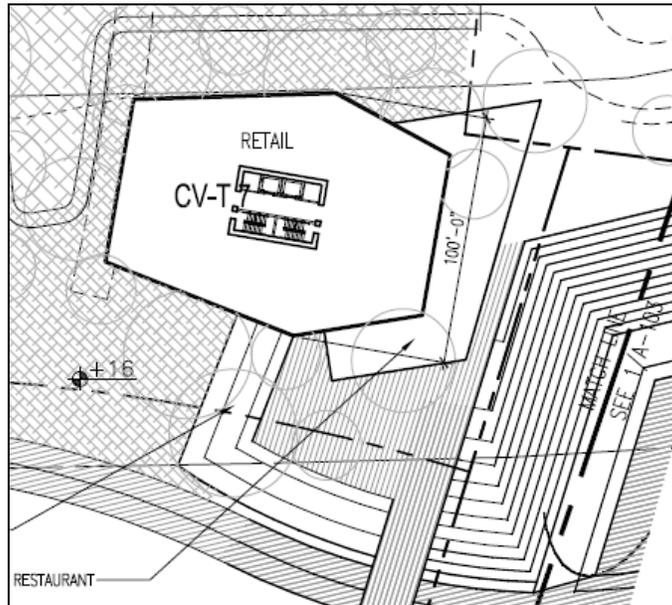


Figure 2 – Footprint for Building CV-T7

Figure 3 shows the data table for the Central Village, including data for building CV-T7. This table indicates that building CV-T7 will have ten floors of residential above the retail podium. Normally, if one builds 10 floors with 10 units per floor as shown in figures 1 and 3, the building would contain 100 total units. However, Figure 3 calculates building CV-T7 as having 108 units based on a rounded estimate of one unit per 1,000 square feet of total residential space (108,300 square feet) in the building. In the same way, the data tables for each phase and for most buildings calculate a different number of units than is implied on the area plans and typical building elevations.

	BUILDING	NUMBER OF STORIES	FLOOR PLATE (SF)	AREA (COMMERCIAL)	⁴ AREA (RETAIL)	AREA (RESIDENTIAL)	NO. OF UNITS (BASED ON 850 SF PER UNIT)
CENTRAL VILLAGE							
	CV-T1	10	10,830	0	0	108,300	108
	CV-T2	12	10,830	0	0	129,960	130
	CV-T3	14	10,830	0	0	151,620	152
	CV-T4	16	10,830	0	0	173,280	173
	CV-T5	14	10,830	0	0	151,620	152
	CV-T6	12	10,830	0	0	129,960	130
	CV-T7	10	10,830	0	0	108,300	108
	CV-PODIUM	1		0	44,000	0	0

10 floors x 10 units/floor
should = 100 units

Figure 3 – Data Table for the Central Village from Sheet A-102

The data tables, building elevations and floor plans need to be consistent. If the typical tower floor in the Central Village will have more than 10 units/floor, as implied in Figure 3, then the typical floor plan on sheet A-300 will need revision to reflect this. Alternatively, the table on sheet A-102 could be updated to reflect 10 units per floor. This applies to all towers in the Central Village.

Tower unit counts in other phases need clarification as well. Building NV-T2 in the North Village is an example (see Figure 4, below). This building would appear to have 10 units on each of its upper floors (and only nine on the first floor due to a need for lobby space). With 16 floors proposed, this would suggest 159 units in the building based (10 units per floor minus one unit for the ground floor lobby). However, the data table on from the same sheet (Figure 5, below) would suggest however that the typical floor would have more than 12 units (195 units/16 floors = 12.2 units/floor).

The DEIS will require new sheets detailing the typical tower plans for the North Village, South Village, and Upper Plaza. In addition, please clarify whether the intent of the floor schematics on Sheet A-101 (Figure 4) is to represent the ground floor or upper floors of the towers. The upper floor plans must be different from what appears on Sheet A-101 because only units 1, 5, 6, and 10 have access the elevator and stairs.

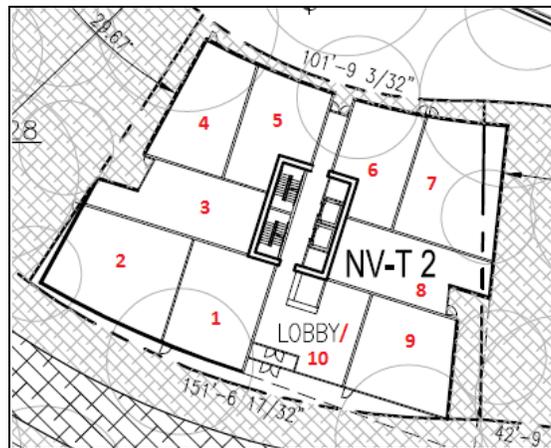


Figure 4 – Building NV-T2 from Sheet A-101 (Unit Numbers Added)

	BUILDING	NUMBER OF STORIES	FLOOR PLATE (SF)	AREA (COMMERCIAL)	AREA (RETAIL)	AREA (RESIDENTIAL)	NO. OF UNITS (BASED ON 850 SF PER UNIT)
NORTH VILLAGE							
	NV-T1	17	10,551	0	0	179,367	179
	NV-T2	16	12,203	0	0	195,248	195 or 159?

Figure 5 – Portion of the Data Table from Sheet A-101

1.B Townhomes:

Snohomish County code defines townhouse dwellings as:

" Dwelling, Townhouse" ("Townhouse") means a single-family dwelling unit constructed in a group of three or more attached units in which each unit extends from the foundation to roof and has open space on at least two sides. The term includes a townhouse constructed as a zero lot line development and a townhouse on a single lot. ([30.91D.525 SCC](#))

In this usage, townhomes are multi-story homes that share a common sidewall with the neighbors. This is also consistent with most vernacular usage of the term and how we would interpret the typical townhome elevation shown on Sheet A-301 (Figure 6, below).



Figure 6 – Typical Townhome Elevation from Sheet A-301

The discussion on townhomes above, however, does not match with how the area plans for each phase depict the buildings and how the units per building are calculated. For instance, Figure 7, next page, appears to show a six-unit design for buildings CV-L1 and -L2. Yet, the data table (Figure 8, also next page) shows 14 units per building. Are these 2-story buildings going to have multi-story townhouse units as suggested by the term and elevation drawing or will the units be stacked flats as suggested in the data tables? Further, either the floor diagrams and or the data tables need revision for internal consistency on the submittal drawings. If the units in these buildings are to be stacked flats, what buildings does Figure 6 depict?

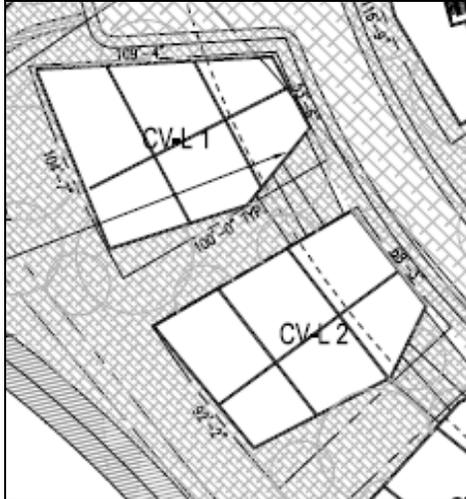


Figure 7 – Buildings CV-L1 and CV-L2 from Sheet A-102

	BUILDING	NUMBER OF STORIES	FLOOR PLATE (SF)	AREA (COMMERCIAL)	AREA (RETAIL)	AREA (RESIDENTIAL)	NO. OF UNITS (BASED ON 850 SF PER UNIT)
CENTRAL VILLAGE							
			13,332	-	-	13,332	16
	CV-L1	2	7,062	0	0	14,124	14
	CV-L2	2	7,062	0	0	14,124	14
	CV-L3	2	7,062	0	0	14,124	14

6 or 7 if townhouses,
12 or 14 if flats

Figure 8 – Portion of Data Table from Sheet A-102 showing 2-Story Townhouse Buildings

1.C Midrise Buildings

Similar to the discussion for the two-story buildings, it is unclear what Figure 9, below, means by townhomes at the base for the midrise buildings. Looking at Figure 9 it would appear to be the vernacular use of “townhouse” meaning that the midrise buildings would have 2-story units on floors 1 and 2 with stacked flats on floors 3 and 4.



Figure 9 – Midrise Building Elevation from Sheet A-102

Figure 10, below, shows a typical floor plan for midrise buildings with six units around an elevator core.

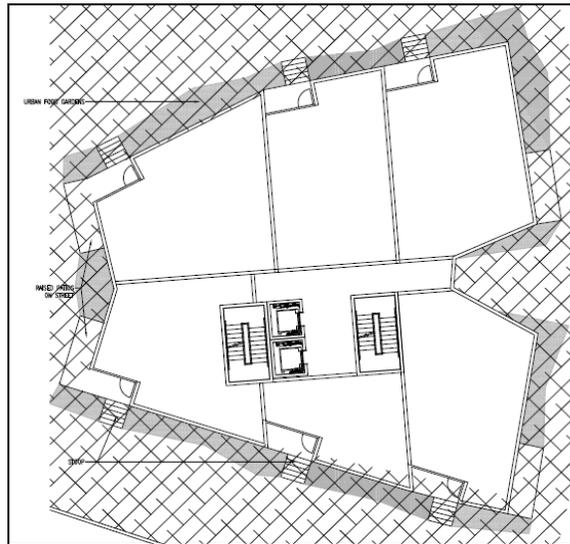


Figure 10 – Typical Floor Plan for Midrise Buildings from Sheet A-301

Based on Figure 9, we would expect the typical building in Figure 10 to contain 18 units total (units 1-6 being townhomes on floors 1 and 2, units 7-12 being flats on floor 3, and units 13-18 being smaller flats on floor 4). This expectation, however, is not what appears on the data table

for these buildings (see Figure 11, below). This table calculates the number of units based on an assumption of 1 unit/1,000 square feet.

	BUILDING	NUMBER OF STORIES	FLOOR PLATE (SF)	AREA (COMMERCIAL)	AREA (RETAIL)	AREA (RESIDENTIAL)	NO. OF UNITS (BASED ON 850 SF PER UNIT)
CENTRAL VILLAGE							
<	CV-L7	4	8,405	0	0	33,620	34
<	CV-L8	4	7,341	0	0	29,364	29

Should this be 18 units per 4-story building?

Figure 11 – Portion of Data Table from Sheet A-102

A further question for these buildings relates to the total building square footage. Figure 9 depicts the top floor being smaller than the lower floors, yet the table in Figure 11 calculates the residential area as the product of the floor plate and the number of stories.¹ For example, for building CV-L7, this is calculated as 8,405 square feet/floor x 4 floors = 33,620 square feet in the building. The updated submittal drawings should clarify the size of the proposed upper floors and reflect the proposal accurately in the data tables.

Issue 2: Commercial Floor Plate Calculations and Floor Area Ratios

More complete floor plate calculations for the commercial areas are necessary for several reasons. Relating to floor plate calculations and proposed uses, the attached Review Completion Letter contains comments on the urban center development proposal, including a request for project data table (item (l)) and a request for data on the total area by use (item (r)). It also requests details and clarification on several individual buildings and uses. This letter builds on these requests in the Review Completion Letter. Additional information that adequately provides the requested information is required before the DEIS is published. This floor plate information will inform at least the following components of the DEIS:

- a) Floor Area Ratio² calculations review per 30.34A.030 SCC³;
- b) The project description in Chapter 2 of the DEIS;
- c) Traffic assumptions for the non-residential uses; and
- d) Construction price/sales estimates for non-residential uses in the fiscal impacts chapter.

¹ The building sections on sheet A-311 also show smaller upper floors on the midrise buildings.

² Point Wells is vested to the 2010 version of 30.91F.445 SCC that was adopted by [Amended Ordinance 09-079](#), which reads:

“Floor Area Ratio” means the total building square footage (building area), measured to the inside face of exterior walls, excluding areas below finished grade, space dedicated to parking, mechanical spaces, elevator and stair shafts, lobbies and commons spaces including atriums and space used for any bonus features, divided by the site size square footage (site area).

Floor Area Ratio = (Building area)/(Site area)

³ Point Wells is vested to the 2010 version of 30.34A.030 SCC that was adopted by [Amended Ordinance 09-079](#).

The leasable area is the basis for trip generation in the traffic modeling. Leasable area is the building area minus things like lobbies and elevator space. Please revise existing drawings and add new drawings to identify the square footages and uses proposed for non-residential building areas, clarifying certain areas such as shown in Figure 13 below.

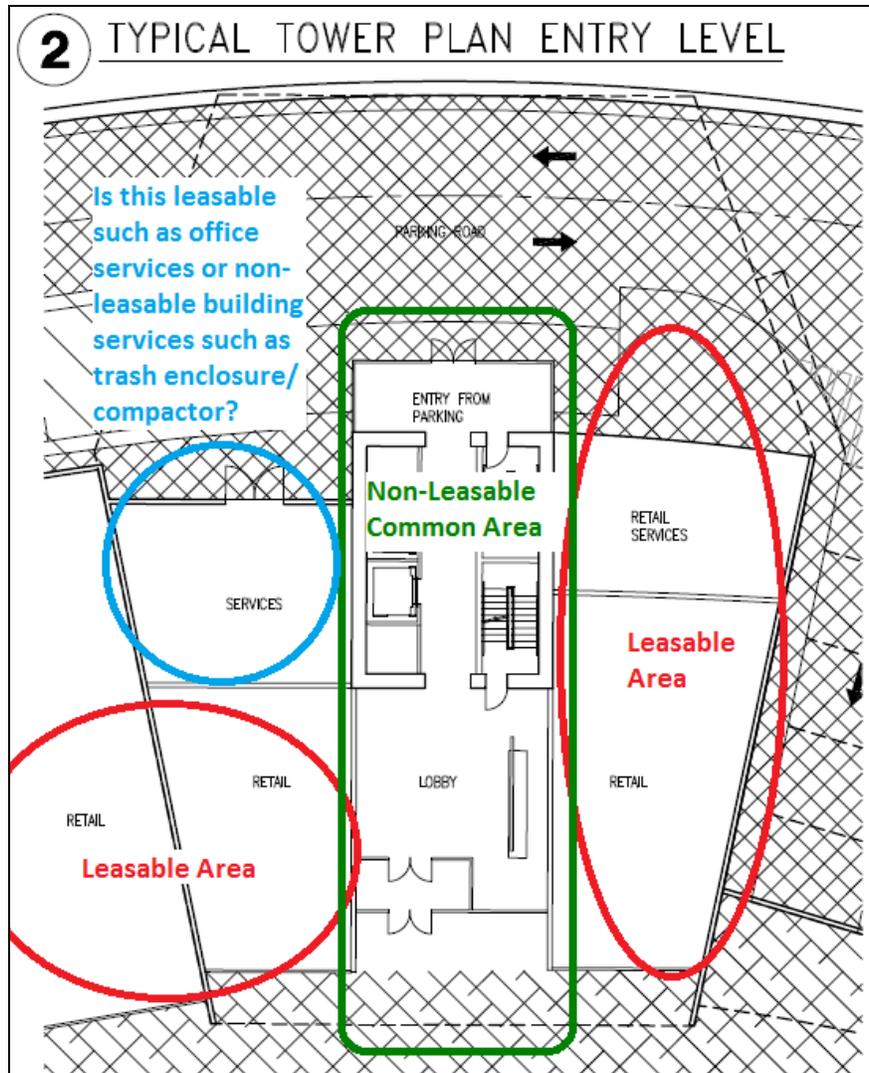


Figure 12 – Building Area vs Leasable Area Illustration and Questions from Sheet A-300

For the DEIS, the summary tables must also be updated to include the specific proposed leasable area of retail, office and restaurant space, consistent with how these uses are identified on the rest of the drawings and how the space will be classified in the traffic modeling. Figure 14, next page, includes some estimated data to show how the updated calculations might depict this. Figure 14 also shows that the total building area is the basis for FAR calculations, rather than the total residential area (as shown on Figure 15, also next page).

	Commercial Building Area				Residential Building Area			Total Building Area
	Office Uses	Retail Uses	Non-Leasable (Estimated at 15% of Leasable)	Commercial Building Area	Residential (Unit Space) (Estimated at 85% of Res. Building Area)	Residential (Common Areas) (Estimated at 15% of Res. Building Area)	Residential Building Area	
Urban Plaza	32,262	26,300	8,784	67,346	216,077	38,131	254,208	321,554
North Village	-	-	-	-	767,228	135,393	902,621	902,621
Central Village	-	44,000	6,600	50,600	1,080,112	190,608	1,270,720	1,321,320
South Village	-	24,000	3,600	27,600	555,191	97,975	653,166	680,766
Total	32,262	94,300	18,984	145,546	2,618,608	462,107	3,080,715	3,226,261
Site Area								2,630,110
Floor Area Ratio	$3,226,261 / 2,630,110 =$							1.23 FAR

Figure 14 – Requested Summary Table Format with Some Estimated Data to Help Illustrate

	AREA (COMMERCIAL)	AREA (RETAIL)	AREA (RESIDENTIAL)	NO. OF UNITS (BASED ON 850SF PER UNIT)
URBAN VILLAGE	32,262	26,300	254,208	254
NORTH VILLAGE	0	0	902,621	903
CENTRAL VILLAGE	0	44,000	1,270,720	1,271
SOUTH VILLAGE	0	24,000	653,166	653
TOTAL	32,262	94,300	3,080,715	3,081
SITE AREA				2,630,110
FLOOR AREA RATIO	$3,080,715 / 2,630,110 =$			1.17 FAR

This should be Urban Plaza

Update per more specific floorplan information rather than a general assumption

Update per revised submittal drawings

This should be the total building area, not just the residential area

Figure 15 – Summary Table from Sheet A-050

Issue 3: Beach Groins

Several of the submittal sheets depict beach groins that are no longer part of the project proposal. Updates to the submittal drawings must remove these from all sheets where they appear, including sheets A-040, A-050, A-051, A-052, A-053, A-054, A-055, A-056, A-101, A-102, L-100, E-050, and RP-1.

Issue 4: Individual Inconsistencies

The submittal drawings include several smaller inconsistencies that must be addressed before the DEIS is issued.

Issue 4a) Building CV-L6: The square footage data for building CV-L6 is inconsistent in the submittal drawings. Sheet A-050 shows the gross floor area as being 7,936 square feet. Sheet A-102 shows the dimensions for building CV-L6 as being greater than buildings CV-L1 to L5; however, the data table on A-102 gives the same floor plate information as these smaller buildings. The data tables need to reflect the building information for CV-L6.

Issue 4b) Floor Schematics: Sheet A-040 shows layered elements of the site, including diagrams of floor plans. These diagrams must be consistent with the updated and new typical floor plans.

Issue 4c) Building Footprints: For the Central Village, Sheet A-050 gives square footages for both building footprint and the assumed boundary around each building. This is confusing. Remove the assumed boundary information from the Central Village and add information on building footprint for the other phases.

Issue 4d) Open Space Calculations: After finalizing the unit counts elsewhere, the open space calculations on Sheet A-052 will need updating (besides, the current Sheet A-052 makes the calculation based on 3,000 units, which is not consistent with the rest of the proposed project).

Issue 4e) Parking Calculations: After finalizing the unit counts and estimates of leasable commercial space elsewhere, the parking calculations on sheets A-053 and A-054 will need updating. The source of the required number of stalls must have text explaining the proposed use of standards adopted in 2013 – after submittal of the project – found in [Table 30.26.032\(1\) SCC](#).

While not strictly required for the current DEIS analysis, we note that the residential parking requirements proposed for use on this project have both a minimum and a maximum requirement. Residential units less than 1,000 square feet have a minimum of one stall per unit and a maximum of 1.5 stalls per unit. Units larger than 1,000 square feet have a minimum of 1.5 stalls per unit and a maximum of 2.5 stalls. The calculations currently on Sheet A-053 are close to the minimum that one would assume if all units were less than 1,000 square feet. However, some of the units, e.g. the townhouses, appear to be greater than 1,000 square feet and would therefore require more parking than the project proposes (assuming no reduction in the unit counts after a review of the proposed floor plans). If the proposed project ends up requiring additional parking and a revised site plan to accommodate more parking, supplemental

environmental analysis may be required. For this reason, we strongly suggest that the updated floor plans show the square footage of each unit and that the calculations on sheets A-053 and A-054 incorporate the range of parking requirements by unit type. This will allow us to verify whether the proposal meets the applicable parking requirements and, potentially, to avoid needing a revised site plan and additional environmental analysis after this EIS process is complete.

Issue 4f: Apart from the cover page, all of the sheets include the phrasing “100% Urban Center Submittal 03/04/2011”. All revised sheets must add a revision date. All new sheets must include the following: “Supplemental sheet to the original 03/04/2011 Urban Center Submittal added on [Date].” We also suggest updating the space held to identify for the project file number that reads “PFN _____” with 2011-101457-LU.

Issues that should be clarified before the DEIS is issued

Several labeling issues should be clarified and minor corrections made before the DEIS is issued, and must be clarified before post-EIS approvals are received. These include:

- **Sheet A-050:** Please label the two unidentified retail buildings in the Urban Plaza.
- **Sheet A-052:** Please label buildings NV-L2 and the two unidentified retail buildings in the Urban Plaza.
- **Sheet A-053:** Please add the missing “l” at the end of “Commercial” in the parking counts for the South Village.
- **Sheet A-055:** Please label the two unidentified retail buildings in the Urban Plaza.
- **Sheet A-056:** Please revise the boundary shown for Phase 1 to include more of the beach area to the north because refurbishment of the pier will require demolition of an existing structure connecting to the pier from the beach in front of Phase 3.
- **Sheet A-300:** The labels for the upper- and entry-floors in the tower appear to be reversed. Please correct.

Thank you for your prompt attention to these requests. I will be on vacation from August 3 to 14. While I am away, feel free to contact David Killingstad if you have any questions.

Respectfully,



Ryan Countryman, Snohomish County

Copy: Gretchen Brunner, EA Engineering
Jeff Ding, EA Engineering
David Killingstad, Snohomish County
Rich Schipanski, EA Engineering

Attachment:

Review Completion Letter (April 12, 2013)