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July 28, 2014

Sound Transit
 Attn: Karin Ertl
 401 S. Jackson St.
 Seattle, WA 98104

RE: Sound Transit Long Range Plan Update—Comments re DEIS
 Request for Inclusion of Sounder Rail Station at Point Wells

Dear Sound Transit:

This letter is submitted on behalf of BSRE Point Wells, LP (“BSRE”) and contains comments regarding the Sound Transit Long Range Update Draft Supplemental EIS.

BSRE is the proponent of and applicant for development approvals for a 3,081 unit mixed-use urban center development on 60+ acres at Point Wells which located just north of the King-Snohomish County line in unincorporated Snohomish County. The Sounder commuter line bisects the site, offering what we believe to be an ideal opportunity to both increase ridership on the Sound Transit north line while enabling the residents at Point Wells to efficiently commute to and from Seattle and beyond. Photos of the model of the proposed urban center development are included for your reference, as are other documents which reflect the planned incorporation of a Sounder station into project plans.

The proposed Point Wells Urban Center with a Sounder rail stop is consistent with and reinforces each of Sound Transit’s five primary goals and objectives for the Long-Range Plan:

- Provide an HCT system that ensures long-term mobility
- Preserve and promote healthy and sustainable environment
- Strengthen community use of the regional transit network
- Improve economic vitality of the region
- Create financial feasible system

The Point Wells urban center proposal includes plans for the construction of a Sounder stop at the heart of the development. We note that a stop in the general area of nearby Richmond Beach has long been included in Sound Transit’s long range plans. We also recognize that this site has not been included in prior funding packages. This omission is not at all surprising given

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A Sounder station in the general vicinity of Shoreline/Richmond Beach is included in Appendix A of the Final SEIS as a "representative project" under the Current Plan Alternative (see Table A-6 in the Final SEIS). These are projects that could be implemented along the corridors that comprise the Current Plan Alternative regardless of whether service is already in operation along those corridors. The list represents the types of projects or support facilities that could be implemented along a corridor if funding is identified. The City of Edmonds and other stakeholders would have additional opportunities to comment on potential station locations as projects are implemented in the future.

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that there has been insufficient rider demand near the site to warrant service. This lack of demand will, however, significantly change with the development of Point Wells. At buildout, Point Wells is expected to house a population in excess of 6,000 people and will include significant and publicly accessible retail, commercial, community and recreational facilities.

Although the project has faced numerous legal challenges, any doubts regarding the project's viability were largely removed when the State Supreme Court ruled earlier in favor of the project. The project team is nearing the successful conclusion of negotiations with the City of Shoreline regarding the mitigation of traffic impacts. Snohomish County is fully engaged in preparing a draft environmental impact statement for the project which should adopt and incorporate the conclusions and mitigation conditions set forth in the Shoreline agreement.

We realize it will take a number of years to complete the necessary permitting process and to then remediate the site and construct sufficient housing to justify a Sounder stop. The current update to Sound Transit's long range service plan is the logical and appropriate time to clearly depict a potential future stop at this site. The inclusion of such a potential stop will also be of great assistance in rebutting the contention that no station will ever be allowed at this location.

We are fully aware that the demand on Sound Transit's limited resources far outweighs available funding. We further recognize the appropriate prioritization of the extension of light rail service to new areas. However, we do not see a Sounder rail station at Point Wells as competing with those funding priorities. To be clear, we are *not* asking that Point Wells be included in the ST 3 funding package. We ask only that this **site be addressed in the ST 3 Final EIS and eventually included in your long range service plan**. We recognize that the construction of the Sounder rail station would be contingent upon the execution of a binding agreement by which **BSRE would commit to fund the construction of this station**.

Our views as described herein are consistent with the direction provided us following prior conversations regarding this possibility. The attached letter dated April 13, 2010 from David Phillip Beal, Sound Transit's Planning and Project Development Manager, includes the following relevant passages:

"First, it is part of Sound Transit's mission to provide service to Urban Centers. Point Wells' location on the Everett-to-Seattle Sounder line and the property's Urban Center designation lend support to [BSRE's] concept of including a commuter rail station within your development . . .

I also want to note that a 'provisional' station located in the Point Wells/Richmond Beach area was part of Sound Transit's original Ten Year Regional Transit System Plan, known as *Sound Move*, with 'provisional' defined as '*subject to funding availability from the North King County subarea . . .*' Because funding did not become available a station was never constructed in this area.

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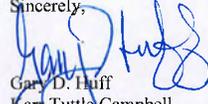
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Should [BSRE] propose to fund the commuter rail station without Sound Transit funding, this could clearly influence the review and timing of the development of a station at Point Wells.”

We believe this development proposal and inclusion of a Sounder rail station at Point Wells represents a true win/win scenario. To help make this proposal a reality, we request that the possible development of a station at Point Wells be addressed in your final EIS. We are confident that the FEIS discussion will underscore the validity of our representations and the extraordinary value of this rare opportunity. We further believe that the express inclusion of such a station in your long range plan, even if the station is again designated as provisional, would meet both your planning and service priorities while fulfilling the goals of the Growth Management Act to place dense housing in locations served (or to be served) by high occupancy transportation operations.

Sincerely,

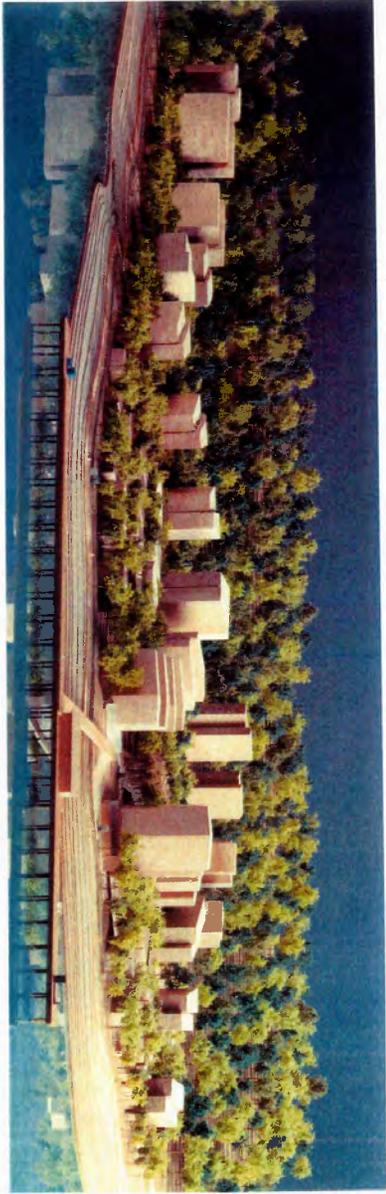


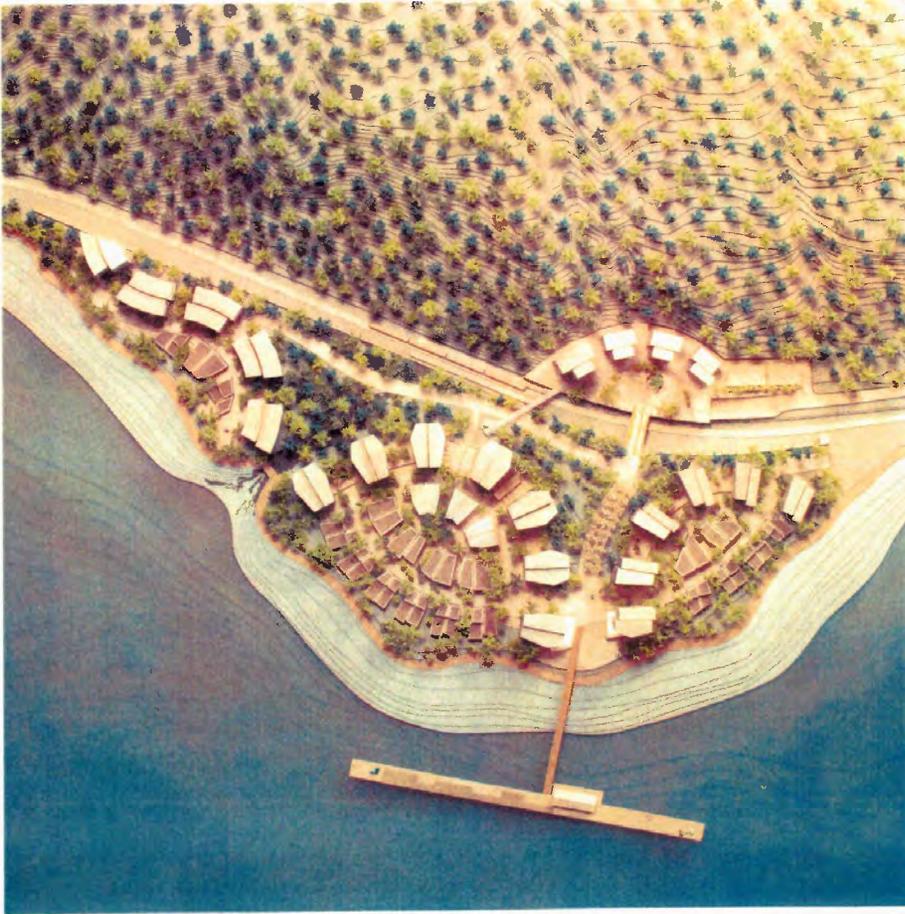
Gary D. Huff
Karl Tuttle Campbell
Land Use Counsel for BSRE Point Wells, LP

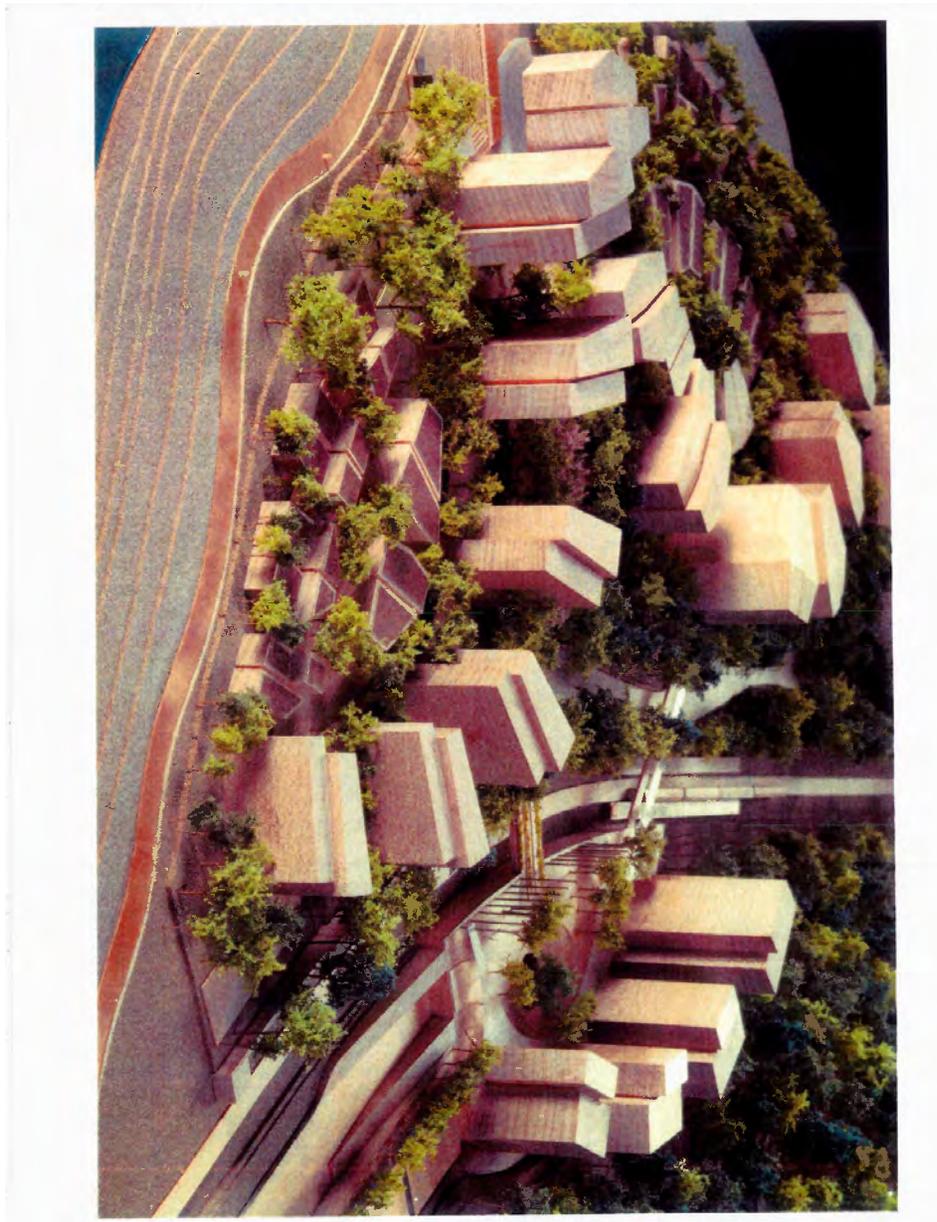
cc: Sound Transit Board of Directors
BSRE Point Wells, LP
Steven D. Farkas, Counsel for BSRE Point Wells, LP
Douglas A. Luetjen, Counsel for BSRE Point Wells, LP
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Ken Johnsen
Brad Tong

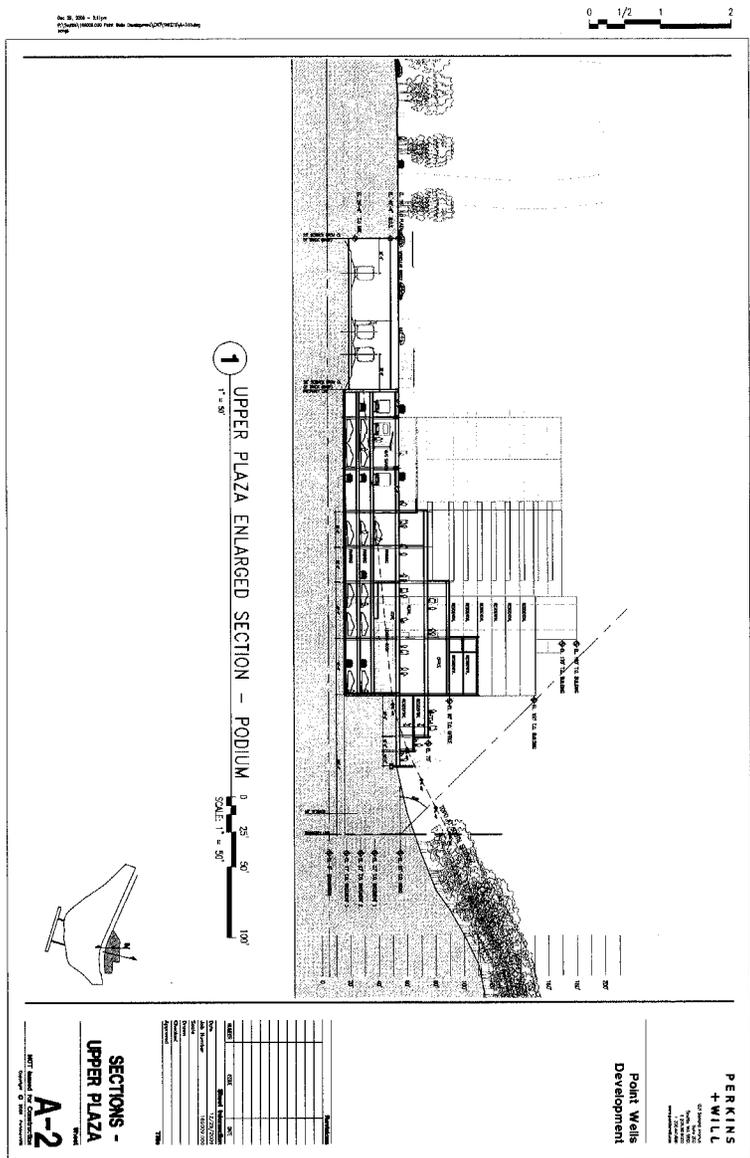
Enclosures

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04/14/2010 WED 11:59 FAX 2069037499 Sound Transit

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April 13, 2010

Mark Wells
 Paramount Petroleum Corp.
 20555 Richmond Beach Drive NW
 Seattle, WA 98177

Re: Point Wells/Richmond Beach Sound Transit Service Opportunity

Dear Mark:

This letter responds to your February 9, 2010 letter regarding Paramount's Point Wells development project. Sound Transit recognizes there are many issues being considered by Snohomish County and other jurisdictions regarding Paramount's proposed development. Most of these are outside Sound Transit's purview. That said, given Snohomish County Council's unanimous approval of an Urban Center designation for Paramount's property, it is appropriate for Sound Transit to respond to your general questions regarding the potential for Sounder commuter rail service at this location. Rather than respond to your six individual questions, I'll provide a general response to your letter.

First, it is part of Sound Transit's mission to provide service to Urban Centers. Point Wells' location on the Everett-to-Seattle Sounder line and the property's "Urban Center" designation lend support to Paramount's concept of including a commuter rail station within your development. Such a station has the potential to increase ridership on the Everett-to-Seattle line. While your property may have adequate room to integrate a station into a multi-modal transit center, there are other issues and constraints that would affect our ability to provide commuter rail service in that location. At our meeting with you in December 2009 we provided you information regarding Sound Transit's design guidelines for rail stations. It would be critical for us to work with the adjoining jurisdictions prior to determining the feasibility of such a station and service in the future, and with the BNSF Railway to establish the Sounder Everett-to-Seattle line's capacity to accommodate an additional station. It is important to note that BNSF would also need to approve the design and location of any new station and platforms.

I also want to note that a "provisional" station located in the Point Wells/Richmond Beach area was part of Sound Transit's original Ten Year Regional Transit System Plan, known as *Sound Move*, with "provisional" defined as "...subject to funding availability from the North King County

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 Jani Eari



subarea" (page 17). Because funding did not become available a station was never constructed in this area.

Despite the potential Point Wells might hold for a commuter rail station, it is important to note that Sound Transit's ST2 plan, approved by the voters in 2008, provides funding for a specific set of capital projects through 2023. It is unlikely that the Sound Transit Board would vote to fund or partially fund any additional projects prior to the second-half of the 15 year plan (2016 or later). Furthermore, any new project would have to be evaluated vis-à-vis other potential additional Sound Transit projects. Since Point Wells falls immediately north of the Richmond Beach provisional station identified in *Sound Move*, a Point Wells station would be located in the Sound Transit Snohomish County subarea. Any Sound Transit costs related to Point Wells would be evaluated against the Board's priorities for that subarea. Should Paramount propose to fund the commuter rail station without Sound Transit funding, this could clearly influence the review and the timing of the development of a station at Point Wells.

I hope this letter is helpful as you continue your work. We look forward to coordinating with Paramount Petroleum as you develop your Point Wells property. Feel free to call me if you have any additional questions.

Sincerely,



David Phillip Beal
Planning & Project Development Manager
Department of Planning, Environmental & Project Development
Sound Transit