

## Eastin, Darryl

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**From:** Graham, Clayton <ClaytonGraham@dwt.com>  
**Sent:** Wednesday, April 02, 2014 3:48 PM  
**To:** Eastin, Darryl  
**Subject:** Additional SEPA Scoping Comments for Point Wells

Thanks for confirming. The Bundrants also join in the updated SEPA scoping comments submitted by Save Richmond Beach and Richmond Beach Advocates this week, specifically including the discussion (on page two of their joint letter submitted today) regarding slope and soil stability in and near the Point Wells development site, and the need for comprehensive studies and risk analyses as part of the SEPA review of the project. This is especially important considering the landslides that have occurred in the vicinity of the proposal, the current geography of the area, and the many unknowns regarding the safety of development in this area.

Thanks much,

Clayton

**Clayton P. Graham** | Davis Wright Tremaine LLP  
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**From:** Eastin, Darryl [<mailto:Darryl.Eastin@co.snohomish.wa.us>]  
**Sent:** Wednesday, April 02, 2014 2:22 PM  
**To:** Graham, Clayton  
**Subject:** RE: Comment Letter re: SEPA Scoping for Point Wells [PCS File Nos. 11-101457; 11-101461 SM; 11-101007 SP; 11-101008 LDA; and 11-101464 RC]

Hello Mr. Graham,

Thank you for your comments regarding the scope of the EIS for Point Wells. I will print your comments for the project file (11-101457 LU) and forward them to our electronic EIS scoping comment file. I also received a printed copy of your comments on behalf of the Bundrants in the mail today.

Darryl

Darryl Eastin, AICP  
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Snohomish County Planning & Development Services  
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*NOTICE: All emails, and attachments, sent to and from Snohomish County are public records and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56)*

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**From:** Graham, Clayton [<mailto:ClaytonGraham@dwt.com>]  
**Sent:** Tuesday, April 01, 2014 10:46 AM

**To:** Eastin, Darryl

**Cc:** Spaulding, Donna; Crawford, David

**Subject:** Comment Letter re: SEPA Scoping for Point Wells [PCS File Nos. 11-101457; 11-101461 SM; 11-101007 SP; 11-101008 LDA; and 11-101464 RC]

Mr. Eastin:

Attached are comments on the SEPA scoping for the Point Wells project, which we're submitting on behalf of the Bundrants. Please confirm receipt of these comments and their inclusion in the City's SEPA comment file.

Regards,

**Clayton P. Graham** | Davis Wright Tremaine LLP

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**From:** Spaulding, Donna

**Sent:** Tuesday, April 01, 2014 10:20 AM

**To:** Graham, Clayton

**Subject:** Bundrant 4/1/14 Comment Letter

**Donna Spaulding** | Davis Wright Tremaine LLP

Legal Secretary

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April 1, 2014

**VIA EMAIL AND U.S. MAIL**

Snohomish County Planning & Development Services  
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Re: Comments on the Scope of the Environmental Impact Statement for the Point Wells  
Development, File Nos. 11-101457; 11-101461 SM; 11-101007 SP; 11-101008 LDA;  
and 11-101464 RC

Dear Mr. Eastin:

This firm represents Joseph and Mary Bundrant in matters relating to the above-referenced development proposal, which involves redevelopment of a waterfront site of over sixty acres at Point Wells (the "Project"). We write on the Bundrants' behalf to submit comments on the scope of the SEPA review being carried out for the Project. The Bundrants will be particularly affected by the Project—perhaps more than any other neighbor—because their home is located adjacent to the Project site. (As I explained in our email exchange last week, the Bundrants' mailing address is 20530 Richmond Beach Drive, Shoreline, Washington 98177, though their property is located in the Town of Woodway.) For the reasons discussed below, the Bundrants oppose the proposed Urban Center and Urban Village Alternatives for the Project, and urge an expanded scoping analysis for the SEPA review of the Project. In our view, proceeding with the Draft Environmental Impact Statement ("DEIS") for the Project without this additional public input and analysis would be premature and inappropriate for a development like the Project, considering its size, complexity, and the numerous significant environmental impacts that will result from the Project. This is especially so considering the omissions in the SEPA documentation that has been provided for the Project so far.

**The Need for Expanded Scoping**

The Bundrants respectfully urge Snohomish County, through its Planning & Development Services (collectively "PDS") to extend and expand the SEPA scoping process for the Project.

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The expansion should include at least one additional scoping meeting, additional notices and information to the public regarding the Project's probable significant impacts, public workshops, and any other steps PDS can take to ensure adequate participation from government and community groups. This should be done to allow the thorough public consideration and input on the alternatives that is warranted by the Project. Pursuant to the SEPA regulations incorporated into the County Code, PDS may expand the scoping process on a proposal-by-proposal basis where it would be consistent with SEPA's policies and goals. *See, e.g.*, WAC 197-11-232(2)(a), -410; *see also* SCC 30.61.020 (adopting SEPA regulations of Chapter 197-11, WAC). We agree with comments submitted by the City of Shoreline and other stakeholders<sup>1</sup> that that Project's significant adverse environmental impacts are broad and encompass all elements of the environment. *See also* WAC 197-11-030(2)(b) (SEPA goals include "emphasiz[ing] important environmental impacts and alternatives"). The breadth of the Project's adverse environmental impacts, and the fact that these impacts will affect a great deal of land as well as a large number of residents in multiple jurisdictions, requires PDS to go further than the bare minimum required by SEPA and the Snohomish County Code.

The Project's impact on and within multiple jurisdictions further necessitates expanded scoping. *See* WAC 197-11-410(2) (expanded scoping is "intended to promote interagency cooperation..."). As residents of Woodway, the Bundrants are concerned that the affected municipalities do not have adequate resources and information necessary to meaningfully participate in the EIS.<sup>2</sup> Prior to beginning the EIS, PDS should make sure the Cities of Woodway and Shoreline, as well as King County, have the resources and technical assistance needed to fully participate in the EIS process on behalf of their citizens. This certainly has not occurred yet, so this should be ensured through the expanded SEPA scoping process.

PDS should also expand the scoping process to "encourage public involvement in decisions that significantly affect environmental quality." *See generally* WAC 197-11-030(2)(f); WAC 197-11-410(2) (expanded scoping intended to "promote . . . public participation . . . . Steps shall be taken . . . to encourage and assist public participation."). As PDS acknowledges, the original Notice of Determination of Significance was not posted at the Project site. While an extended comment period may or may not meet the notice requirements of SEPA, it does not, as a practical matter, provide enough time for citizens—in particular those without technical knowledge or expertise—to review the voluminous material relating to the size and scope of the Project or have an adequate opportunity to participate in this stage of its SEPA review. The Project, in addition to its sheer size, directly affects at least three municipalities and two counties. The Project directly affects tens of thousands of residents and, as Save Richmond Beach notes in

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its comment letter<sup>3</sup>, its potential transportation impacts affect the entire northern Seattle metropolitan area by increasing trips to and from Interstate 5. Again, the probable adverse environmental impact of the Project is so expansive that the statutory minimum is just not enough. Additional time is needed so that citizens and affected jurisdictions can participate in the scoping process in a meaningful way.

### **The Inadequacy of the Alternatives**

PDS should consider additional alternatives to the Project and revise the Urban Village Alternative. The three proposed alternatives are inadequate because they fail to encompass other less environmentally costly and reasonable courses of action. *See generally* WAC 197-11-792(2)(b)(ii); *King Cnty. v. Cent. Puget Sound Bd.*, 138 Wn.2d 161, 183 (1999). The Urban Center and Urban Village Alternatives are essentially the same alternative and thus contribute almost nothing to the analysis of proposed impacts from the Project. Both Alternatives radically increase the intensity of residential, commercial, and retail development in the area and both have proposed roughly the same amount of commercial, office, and retail uses; the only difference between said alternatives being a modest reduction in the number of residential units and some reduction in open space. At a minimum, the Urban Village Alternative should have at least as much open space and parks as the Urban Center Alternative.

The “No Action” Alternative is not truly “no action” because it contemplates expansion of “underutilized existing facilities,” without sufficient evidence of any demand for such increased utilization. In other words, the “alternatives” presented are large-scale industrial development, large-scale residential/commercial development, and larger-scale residential/commercial development. In order for the EIS to provide a useful benchmark by which to analyze such a massive increase in intensity of development, PDS should consider lower impact alternatives as suggested by Save Richmond Beach and Richmond Beach Advocates in their SEPA scoping comments.<sup>4</sup> The County must also consider the true “no action” alternative of continuing use of the site as an industrial facility *as currently utilized*.

### **The Inadequacy of the Applicant’s SEPA Checklist**

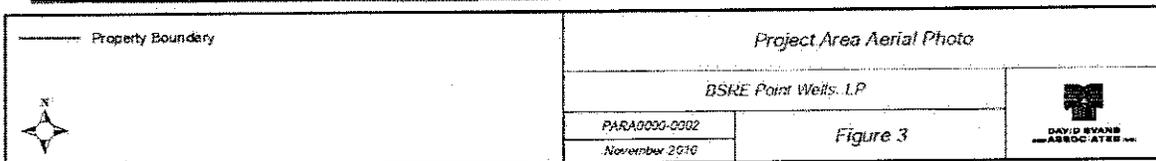
PDS should require the applicant to update and resubmit its SEPA checklist prior to proceeding with SEPA scoping for the Project. The applicant’s SEPA checklist, dated February 2011, is outdated. And considering the current proposal before PDS, it is an inadequate base from which to conduct the full environmental analysis that is required for the Project. To give one example,

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<sup>3</sup> See Save Richmond Beach’s comment letter dated March 3, 2014.

<sup>4</sup> See Richmond Beach Advocates’ comment letter dated March 3, 2014.

note the following aerial view of the Project, which was provided by the applicant in the initial SEPA checklist for the Project:



The area surrounding the Project site has changed since 2011 and the SEPA checklist does not take these changes into account. Notably, the Bundrants' home is located in the area indicated by the red arrow in the graphic above, but does not appear in the above map. Nor does it show the numerous houses that are located to the southeast of the Project site—all of which can be seen in the following aerial photo, which we accessed through Google Maps several days ago. In the following graphic, the location of these residences is indicated with red arrows.



The Project will have significant adverse impacts on all of these properties, and these impacts must be taken into account in the DEIS for the Project. The view impacts alone deserve particular attention, as the Project could nearly eliminate the view of the Sound and the Olympics for many of these owners. These impacts are not acknowledged or discussed in the SEPA documents provided for the Project. Notably, some of the buildings in the Project (specifically, those identified as SV-T 3 through 5 in the Project documents) are slated to be eight to twelve stories tall, and will tower over nearby homes—possibly as much as 120 feet. Yet, the applicant's View Impact analysis does not acknowledge this impact, or present a cross-section showing the relative heights of development for this location.<sup>5</sup> PDS must conduct a thorough view impact analysis as part of the DEIS, and should not rely on the limited information provided in the SEPA Checklist for the Project.

<sup>5</sup> The applicant states that a "small number" of neighboring residents' "small but noticeable portion" of Olympic Mountain and Puget Sound views could be affected. EIS Checklist, page 36. This potential impact is not analyzed in the applicant's View Impact analysis cross-sections.

PDS must also go beyond the applicant's Extended Traffic Impact Analysis, for the reasons spelled out in detail in the SEPA scoping comments of Save Richmond Beach, Richmond Beach Advocates, and the City of Shoreline. The Bundrants access their property via NW Richmond Beach Drive, which is the *only* access to the Project. The Bundrants will be particularly affected by the massive increase in vehicle trips per day on NW Richmond Beach Drive caused by the Project.

### **Elements of the Environment to Be Analyzed in EIS**

The DEIS for the Project should evaluate all elements of the natural and built environments set forth in WAC 197-11-444, *including all sub-elements therein*. The scope of every EIS must include study of probable significant adverse impacts. *See, e.g.*, WAC 197-11-408. The Bundrants agree with PDS's decision to include Earth, Water Resources, Air Quality, Noise, Energy/Greenhouse Gases, Plants and Animals, Environmental Health, Aesthetics, Land Use/Plans and Policies, Historic and Cultural Resources, Transportation, Public Services and Utilities in the scope of the EIS. The Project will result in probable significant adverse impacts to each of these elements for the reasons set forth in the SEPA scoping comments submitted to you by Save Richmond Beach, Richmond Beach Advocates, and the City of Shoreline. Almost every one of these impacts will disproportionately affect the Bundrants as the Project's closest residential neighbor, so we respectfully urge you to consider and fully analyze each of these sub-elements listed in Appendix A to this letter. Further, due to the size of this project—which is unprecedented in this area—its significant adverse environmental impacts will extend to each of these sub-elements.

By way of example, the SEPA Checklist for the Project acknowledges the significant landslide hazards, liquefaction hazards, and critical areas, including wetlands, existing at the Project site. The Project will have an adverse effect on the shoreline and tidelands and will generate at least a hundred-fold increase in traffic along its only point of access. The Project will have significant land use impacts, including light and glare, view obstruction, and noise impacts on the surrounding neighborhoods, including the Bundrants. These and other significant adverse environmental impacts are not only likely to result from the Project and thus require evaluation in the EIS, their mitigation may also limit development of the site to such an extent that it will not accommodate the Urban Center and Urban Village Alternatives proposed by the applicant. PDS must consider this possibility in its scoping decision, and in its analysis of the overall Project, as the County may (and in our view, should) require the evaluation of alternatives with less density and impacts in its review of the Project.

It would also be appropriate to include an economic impact analysis in the EIS, which is warranted considering the Project's impacts outside the County, in the City of Shoreline and the Town of Woodway, and within Snohomish County due to increased traffic congestion, increased need for public services (including public transportation, schools, utilities, and emergency

services), and the effect on existing housing and businesses resulting from a massive increase in the scale of development in the area. *See also* WAC 197-11-448(4).

**Incorporation of Prior Comments**

While the Bundrants have recently retained their own counsel, they have been actively participating in the review of the Project and have supported neighbors' and neighborhood groups' efforts to ensure the adequacy of this public process. The Bundrants generally agree with and support their neighbors prior comments on the Project in general and the County's SEPA review of the same, and hereby incorporate by reference the SEPA scoping comments submitted by Save Richmond Beach in its letter dated March 3, 2104, Richmond Beach Advocates in its letter dated March 3, 2014, and the City of Shoreline in its comment letter of February 21, 2014.

**Conclusion**

As is evident from the concerns and impacts noted in neighbors' and stakeholders' comment letters, the Project will result in significant adverse environmental impacts to all elements and sub-elements of the natural and built environments. SEPA requires a full examination and analysis of each of these potential impacts, as well as adequate public participation in this process. The fact that a number of critical stakeholders have yet to weigh in on the Project demonstrates the inadequacy of public participation so far. Considering this, we respectfully urge PDS to extend and expand the scoping process for the Project to allow for public consideration and input on the current proposal, alternatives to the Project as proposed, and possible mitigation. An adequate analysis of these impacts will demonstrate the unsuitability of the Point Wells site for a massive urban redevelopment, including the lack of adequate access for the number of vehicle trips that will result from the Project. In any event, the County's review of the Project must fully analyze alternatives as well as alternatives with less density and fewer impacts on the environment and the Project's neighbors.

Thank you for consideration of these comments.

Sincerely,

Davis Wright Tremaine LLP



Clayton P. Graham

cc: Joseph and Mary Bundrant

## Appendix A

### **Affected Elements of the Environment**

- **Natural Environment**
  - Earth
  - Geology
  - Soils (including but not limited to landslide and earthquake hazards)
  - Topography
  - Unique physical features (including but not limited to the site's location, which is surrounded on three sides by steep bluffs and water)
  - Erosion (including but not limited to probable effects on the shoreline resulting from significant construction activities)
- **Air**
  - Air quality (both during construction and due to a massive increase in vehicular traffic)
  - Odor (both during construction and due to a massive increase in vehicular traffic)
  - Climate (both during construction and due to a massive increase in vehicular traffic)
- **Water**
  - Surface water movement/quantity/quality
  - Runoff/absorption
  - Floods
  - Groundwater movement/quantity/quality
  - Public water supplies (including a study the effect on existing capacity)
- **Plants and animals**
  - Habitat for and numbers or diversity of species of plants, fish, or other wildlife
  - Unique species
  - Fish or wildlife migration routes
- **Energy and Natural Resources**
  - Amount required/rate of use/efficiency
  - Source/availability
  - Nonrenewable resources
  - Conservation and renewable resources
  - Scenic resources
- **Environmental Health**
  - Noise
  - Risk of explosion
  - Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials (including but not limited to releases occurring during the proposed cleanup of the site)
- **Land and Shoreline Use**
  - Relationship to existing land use plans and to estimated population
  - Housing
  - Light and glare (both during construction and as-built)
  - Aesthetics

- Recreation (including effects on shoreline recreation and public access)
- Historic and cultural preservation
- **Transportation**
  - Transportation systems (including but not limited to probable adverse effects throughout the northern metropolitan area)
  - Vehicular traffic
  - Waterborne, rail, and air traffic (including but not limited to safety and environmental hazards resulting due to the Project's proximity to BNSF's existing railway)
  - Parking
  - Movement/circulation of people or goods (including but not limited to an evaluation of the need for multiple points of ingress/egress to and from the Project)
  - Traffic hazards (including but not limited to hazards to drivers, bicyclists, pedestrians, and wildlife due to increase traffic volume and speed)
- **Public Services and Utilities**
  - Fire
  - Police
  - Schools
  - Parks or other recreational facilities
  - Maintenance
  - Communications
  - Water/storm water
  - Sewer/solid waste
  - Other governmental services or utilities (including but not limited to the probable adverse effects of providing emergency services in an area with only one point of ingress/egress)



April 1, 2014

**VIA EMAIL AND U.S. MAIL**

Snohomish County Planning & Development Services  
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2<sup>nd</sup> Floor, Robert Drewel Building  
Everett, WA 98201  
E-mail: [darryl.eastin@co.snohomish.wa.us](mailto:darryl.eastin@co.snohomish.wa.us)

Re: Comments on the Scope of the Environmental Impact Statement for the Point Wells Development, File Nos. 11-101457; 11-101461 SM; 11-101007 SP; 11-101008 LDA; and 11-101464 RC

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note the following aerial view of the Project, which was provided by the applicant in the initial SEPA checklist for the Project:



 <small>Gx1973</small>	 Property Boundary		<i>Project Area Aerial Photo</i>		
			<i>BSRE Point Wells, LP</i>		
			<small>PARA0000-0002</small>	<i>Figure 3</i>	
			<small>November 2010</small>		

The area surrounding the Project site has changed since 2011 and the SEPA checklist does not take these changes into account. Notably, the Bundrants' home is located in the area indicated by the red arrow in the graphic above, but does not appear in the above map. Nor does it show the numerous houses that are located to the southeast of the Project site—all of which can be seen in the following aerial photo, which we accessed through Google Maps several days ago. In the following graphic, the location of these residences is indicated with red arrows.



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PDS must also go beyond the applicant's Extended Traffic Impact Analysis, for the reasons spelled out in detail in the SEPA scoping comments of Save Richmond Beach, Richmond Beach Advocates, and the City of Shoreline. The Bundrants access their property via NW Richmond Beach Drive, which is the *only* access to the Project. The Bundrants will be particularly affected by the massive increase in vehicle trips per day on NW Richmond Beach Drive caused by the Project.

### **Elements of the Environment to Be Analyzed in EIS**

The DEIS for the Project should evaluate all elements of the natural and built environments set forth in WAC 197-11-444, *including all sub-elements therein*. The scope of every EIS must include study of probable significant adverse impacts. *See, e.g.*, WAC 197-11-408. The Bundrants agree with PDS's decision to include Earth, Water Resources, Air Quality, Noise, Energy/Greenhouse Gases, Plants and Animals, Environmental Health, Aesthetics, Land Use/Plans and Policies, Historic and Cultural Resources, Transportation, Public Services and Utilities in the scope of the EIS. The Project will result in probable significant adverse impacts to each of these elements for the reasons set forth in the SEPA scoping comments submitted to you by Save Richmond Beach, Richmond Beach Advocates, and the City of Shoreline. Almost every one of these impacts will disproportionately affect the Bundrants as the Project's closest residential neighbor, so we respectfully urge you to consider and fully analyze each of these sub-elements listed in Appendix A to this letter. Further, due to the size of this project—which is unprecedented in this area—its significant adverse environmental impacts will extend to each of these sub-elements.

By way of example, the SEPA Checklist for the Project acknowledges the significant landslide hazards, liquefaction hazards, and critical areas, including wetlands, existing at the Project site. The Project will have an adverse effect on the shoreline and tidelands and will generate at least a hundred-fold increase in traffic along its only point of access. The Project will have significant land use impacts, including light and glare, view obstruction, and noise impacts on the surrounding neighborhoods, including the Bundrants. These and other significant adverse environmental impacts are not only likely to result from the Project and thus require evaluation in the EIS, their mitigation may also limit development of the site to such an extent that it will not accommodate the Urban Center and Urban Village Alternatives proposed by the applicant. PDS must consider this possibility in its scoping decision, and in its analysis of the overall Project, as the County may (and in our view, should) require the evaluation of alternatives with less density and impacts in its review of the Project.

It would also be appropriate to include an economic impact analysis in the EIS, which is warranted considering the Project's impacts outside the County, in the City of Shoreline and the Town of Woodway, and within Snohomish County due to increased traffic congestion, increased need for public services (including public transportation, schools, utilities, and emergency

services), and the effect on existing housing and businesses resulting from a massive increase in the scale of development in the area. *See also* WAC 197-11-448(4).

### **Incorporation of Prior Comments**

While the Bundrants have recently retained their own counsel, they have been actively participating in the review of the Project and have supported neighbors' and neighborhood groups' efforts to ensure the adequacy of this public process. The Bundrants generally agree with and support their neighbors prior comments on the Project in general and the County's SEPA review of the same, and hereby incorporate by reference the SEPA scoping comments submitted by Save Richmond Beach in its letter dated March 3, 2104, Richmond Beach Advocates in its letter dated March 3, 2014, and the City of Shoreline in its comment letter of February 21, 2014.

### **Conclusion**

As is evident from the concerns and impacts noted in neighbors' and stakeholders' comment letters, the Project will result in significant adverse environmental impacts to all elements and sub-elements of the natural and built environments. SEPA requires a full examination and analysis of each of these potential impacts, as well as adequate public participation in this process. The fact that a number of critical stakeholders have yet to weigh in on the Project demonstrates the inadequacy of public participation so far. Considering this, we respectfully urge PDS to extend and expand the scoping process for the Project to allow for public consideration and input on the current proposal, alternatives to the Project as proposed, and possible mitigation. An adequate analysis of these impacts will demonstrate the unsuitability of the Point Wells site for a massive urban redevelopment, including the lack of adequate access for the number of vehicle trips that will result from the Project. In any event, the County's review of the Project must fully analyze alternatives as well as alternatives with less density and fewer impacts on the environment and the Project's neighbors.

Thank you for consideration of these comments.

Sincerely,

Davis Wright Tremaine LLP



Clayton P. Graham

cc: Joseph and Mary Bundrant

## Appendix A

### **Affected Elements of the Environment**

- **Natural Environment**
  - Earth
  - Geology
  - Soils (including but not limited to landslide and earthquake hazards)
  - Topography
  - Unique physical features (including but not limited to the site's location, which is surrounded on three sides by steep bluffs and water)
  - Erosion (including but not limited to probable effects on the shoreline resulting from significant construction activities)
- **Air**
  - Air quality (both during construction and due to a massive increase in vehicular traffic)
  - Odor (both during construction and due to a massive increase in vehicular traffic)
  - Climate (both during construction and due to a massive increase in vehicular traffic)
- **Water**
  - Surface water movement/quantity/quality
  - Runoff/absorption
  - Floods
  - Groundwater movement/quantity/quality
  - Public water supplies (including a study the effect on existing capacity)
- **Plants and animals**
  - Habitat for and numbers or diversity of species of plants, fish, or other wildlife
  - Unique species
  - Fish or wildlife migration routes
- **Energy and Natural Resources**
  - Amount required/rate of use/efficiency
  - Source/availability
  - Nonrenewable resources
  - Conservation and renewable resources
  - Scenic resources
- **Environmental Health**
  - Noise
  - Risk of explosion
  - Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials (including but not limited to releases occurring during the proposed cleanup of the site)
- **Land and Shoreline Use**
  - Relationship to existing land use plans and to estimated population
  - Housing
  - Light and glare (both during construction and as-built)
  - Aesthetics

- Recreation (including effects on shoreline recreation and public access)
- Historic and cultural preservation
- **Transportation**
  - Transportation systems (including but not limited to probable adverse effects throughout the northern metropolitan area)
  - Vehicular traffic
  - Waterborne, rail, and air traffic (including but not limited to safety and environmental hazards resulting due to the Project's proximity to BNSF's existing railway)
  - Parking
  - Movement/circulation of people or goods (including but not limited to an evaluation of the need for multiple points of ingress/egress to and from the Project)
  - Traffic hazards (including but not limited to hazards to drivers, bicyclists, pedestrians, and wildlife due to increase traffic volume and speed)
- **Public Services and Utilities**
  - Fire
  - Police
  - Schools
  - Parks or other recreational facilities
  - Maintenance
  - Communications
  - Water/storm water
  - Sewer/solid waste
  - Other governmental services or utilities (including but not limited to the probable adverse effects of providing emergency services in an area with only one point of ingress/egress)

## Eastin, Darryl

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**From:** Graham, Clayton <ClaytonGraham@dwt.com>  
**Sent:** Wednesday, April 02, 2014 3:48 PM  
**To:** Eastin, Darryl  
**Subject:** Additional SEPA Scoping Comments for Point Wells

Thanks for confirming. The Bundrants also join in the updated SEPA scoping comments submitted by Save Richmond Beach and Richmond Beach Advocates this week, specifically including the discussion (on page two of their joint letter submitted today) regarding slope and soil stability in and near the Point Wells development site, and the need for comprehensive studies and risk analyses as part of the SEPA review of the project. This is especially important considering the landslides that have occurred in the vicinity of the proposal, the current geography of the area, and the many unknowns regarding the safety of development in this area.

Thanks much,

Clayton

**Clayton P. Graham** | Davis Wright Tremaine LLP  
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**From:** Eastin, Darryl [mailto:[Darryl.Eastin@co.snohomish.wa.us](mailto:Darryl.Eastin@co.snohomish.wa.us)]  
**Sent:** Wednesday, April 02, 2014 2:22 PM  
**To:** Graham, Clayton  
**Subject:** RE: Comment Letter re: SEPA Scoping for Point Wells [PCS File Nos. 11-101457; 11-101461 SM; 11-101007 SP; 11-101008 LDA; and 11-101464 RC]

Hello Mr. Graham,

Thank you for your comments regarding the scope of the EIS for Point Wells. I will print your comments for the project file (11-101457 LU) and forward them to our electronic EIS scoping comment file. I also received a printed copy of your comments on behalf of the Bundrants in the mail today.

Darryl

Darryl Eastin, AICP  
Principal Planner  
Snohomish County Planning & Development Services  
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*NOTICE: All emails, and attachments, sent to and from Snohomish County are public records and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56)*

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**From:** Graham, Clayton [mailto:[ClaytonGraham@dwt.com](mailto:ClaytonGraham@dwt.com)]  
**Sent:** Tuesday, April 01, 2014 10:46 AM

**To:** Eastin, Darryl  
**Cc:** Spaulding, Donna; Crawford, David  
**Subject:** Comment Letter re: SEPA Scoping for Point Wells [PCS File Nos. 11-101457; 11-101461 SM; 11-101007 SP; 11-101008 LDA; and 11-101464 RC]

Mr. Eastin:

Attached are comments on the SEPA scoping for the Point Wells project, which we're submitting on behalf of the Bundrants. Please confirm receipt of these comments and their inclusion in the City's SEPA comment file.

Regards,

**Clayton P. Graham** | Davis Wright Tremaine LLP  
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**From:** Spaulding, Donna  
**Sent:** Tuesday, April 01, 2014 10:20 AM  
**To:** Graham, Clayton  
**Subject:** Bundrant 4/1/14 Comment Letter

**Donna Spaulding** | Davis Wright Tremaine LLP  
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