

March 1, 2014

Snohomish County Planning and Development Services
3000 Rockefeller Avenue, 2nd Floor East
ATTN: Mr. Darryl Eastin, project manager
RE: EIS Point Wells/ BSRE development

Dear Sir,

I support Alternative 3- No Action Alternative for the Point Wells site.

I support the continued industrial use designation for the Point Wells property. Industry on the central and lower Puget Sound needs a petroleum tank farm for asphalt product and bunker fuel storage.

BSRE's parent company Alon USA is a leader in the petroleum industry and I welcome the renewed and increased utilization of the property through new investment in a state of the art facility constructed within industry standards and needs plus EPA and DOE guidelines.

I do not support any effort to force an inappropriate Urban Center or Urban Village Alternative on this almost inaccessible property.

The present petroleum tank farm and now inactive reduction plants have been successfully served for a century by rail, marine and trucking transportation. The uniform loads of petroleum tanks will not affect nor be affected by the underlying unstable soils which are layer upon layer of landslides, marine sediments, alluvial deposits and polluted fill.

Cost engineering will prohibit a structurally sound or environmentally safe solution for supporting the immense structures designed by the BSRE/ Perkins+Will partnership.

Pollutants on the site are now "locked". Site clean up on the scale proposed for Alternatives 1 & 2 will "unlock" petroleum toxins including PCB's into Puget Sound at an intolerable level.

A selective clean up for modern petroleum industry uses will be more effective and focused than the mania of a real estate timeline.

The expenditure of fossil fuel energy required to execute Alternatives 1&2 then maintain the residential/commercial/retail uses proposed are astronomical in comparison to those of a site closer to primary transportation routes such as I-5,

SR99/104 and major arterials such as NW205/244SW. The site is remote and on the fringe of utility and social infrastructure. An analogy would be that if I-5 or SR 99 are to Point Wells what the spine is to a human then Point Wells is a finger nail.

To maintain or enhance the present industrial use continues realistic rail, marine and truck fleet energy consumption. Alternatives 1&2 are analogous to thrust required at lift off for pay loads into space.

BSRE/ Perkins+Will have proposed a rail station, increased bus transit and captured ADT (average daily trips) as a solution to the increased emissions, noise generation, energy use and GHG pollution generated by the clean up, construction and eventual occupation of Alternatives 1&2.

All three Alternatives will require rejuvenation of the existing side track.

Unfortunately the reality is that Sound Transit has no plan for a rail station at Point Wells after excluding two proposed Richmond Beach station locations in its 1999 EIS.

Increased rail freight traffic, specifically the enormous increase in coal tonnage which is forecast into mid century has interrupted Commuter Rail Transit due to increased mudslides during winter months. The solution of another track on pilings offshore is in direct conflict with Shoreline Management Laws.

Metro Transit has been eliminating routes to Richmond Beach since 2002 in its budget woes.

Captured ADT is an illusion. Whether 3,100 or 2,700 residential units are built those residents are consuming Americans and their certificates of independence are their cars. Present parking requirements are between 0.0 and 1.2 cars per unit yet casual observation alone puts the lie to that figure. Captured ADT does not reflect the service personnel who will commute to the Urban Alternatives or who work in the proposed commercial and retail spaces.

The commercial / retail areas contemplated are roughly the size of the present Fred Meyer Center on 185th and Aurora in Shoreline. One must question the marketing strategy of building such a large commercial/retail component to a residential development depending on an imaginary ADT capture rate in a mobile culture.

The timeline for BSRE/ Point Wells is stretched over two-three decades. End of project/ build out transportation, utility and social infrastructure issues relating to the residential community of Richmond Beach and identified traffic corridors through Shoreline will have to be finished first just to allow for increased construction traffic.

While the EIS Notice specifically mentions police and fire stations on site for Alternatives 1&2 there is no mention of schools. Alternative 3 eliminates most of this investment.

TRANSPORTATION ALTERNATIVE: All transportation/ infrastructure improvements to service the proposed BSRE Point Wells urban center are within and the responsibility of Snohomish County.

Residential property adjacent Firdale Avenue between the 23800 and 24400 blocks will be bought and redeveloped by BSRE to accommodate a tunnel connecting the BSRE Point Wells development to SW 244th St./ N 205th St. via Firdale Avenue and SR 104 via Firdale Ave. and 100th Ave W. Upon completion the property and improvements will be dedicated to Snohomish County as a utility and access easement.

- A: A westbound flyover of Firdale Avenue to Point Wells.
- B: An eastbound connector to Firdale Avenue.
- C: A northbound fly over to Firdale Avenue.
- D: A southbound Firdale Avenue exit to Point Wells.
- E: An entrance/ exit to an appropriately sized tunnel to and from Point Wells.
- F: All supporting infrastructure for BSRE Point Wells will be routed through said tunnel.

