



City of Shoreline 2018 Comprehensive Plan Amendment - Att. 6

Planning & Community Development  
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Permit Hours: M - F \* 8:00 a.m. to 4:00 p.m.

COMPREHENSIVE PLAN  
GENERAL AMENDMENT  
APPLICATION

Amendment proposals may be submitted at any time, however if it is not submitted prior to the deadline for consideration during that annual amendment cycle, ending on December 1st, the amendment proposal will not be considered until the next annual amendment cycle.

Please attach additional pages to this form, as needed.

Contact Information - If the proposal is from a group, please provide a contact name.

Applicant Name Tom Mailhot Tom Mailhot  
Address 2432 NW 201<sup>st</sup> Place City Shoreline State WA Zip 98177  
Phone 206 321 5612 Fax \_\_\_\_\_ Email tmailhot5@gmail.com

Proposed General Amendment - This can be either conceptual: a thought or idea; or specific changes to wording in the Comprehensive Plan, but please be as specific as possible so that your proposal can be adequately considered. If specific wording changes are proposed please use underline to indicate proposed additions and strikethrough to indicate proposed deletions. Please note that each proposed amendment requires a separate application.

Revise the Point Wells subarea Plan to account for changes since it was originally passed. Example: Pt wells Upper Bluff has been annexed by Woodway

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PCD

Reference Element of the Shoreline Comprehensive Plan (required) and page number (if applicable) - (e.g. Land Use, Transportation, Capital Facilities, Housing, etc.)

Point Wells Subarea Plan

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**Support for the Amendment** - Explain the need for the amendment. Why is it being proposed? How does the amendment address changing circumstances or values in Shoreline? Describe how the amendment is consistent with the current Shoreline Comprehensive Plan, if inconsistent, explain why. How will this amendment benefit the citizens of Shoreline? Include any data, research, or reasonings that supports the proposed amendment. (A copy of the Shoreline Comprehensive Plan is available for use at the Planning & Community Development department, Shoreline Neighborhood Police Centers, and the Shoreline and Richmond Beach libraries).

Emailed revisions and explanations to  
Steve Szafraan + to pcd@shorelinewa.gov

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**Signature** - An amendment application can not be accepted unless the signature block below has been completed. The applicant certifies that all of the aforementioned statements in this application, any exhibits and/or maps transmitted herewith are true and the applicant acknowledges that any amendment granted based on this application may be revoked if any such statement is false.

Application Signature

*Tom Markot*

Date

*12/1/2017*

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**PROPOSED AMENDMENTS WITHOUT THE REQUIRED APPLICATION INFORMATION MAY BE REJECTED OR RETURNED FOR ADDITIONAL INFORMATION.**

# Subarea Plan 2 – Point Wells

## Geographic and Historical Context

Point Wells is an unincorporated island of approximately ~~400~~ <sup>61</sup> acres in the southwesternmost corner of Snohomish County. It is bordered on the west by Puget Sound, on the east by the Town of Woodway, and on the south by the town of Woodway and the City of Shoreline (see Fig. 1). It is an “island” of unincorporated Snohomish County because this land is not contiguous with any other portion of unincorporated Snohomish County. ~~The island is bisected roughly north-south by the Burlington Northern Railroad (B.N.R.R.) right-of-way.~~ <sup>2</sup>



**Figure 1 – Point Wells unincorporated island**

**[Note: Revise Figure 1 to delete the depicted Upland Area and to show it instead as being part of the Town of Woodway (this revision reflects Woodway’s recent annexation of land east of the BNRR).]**

<sup>1</sup> All the DEIS documents submitted by the developer list the lowland property as 61 acres. Since Woodway has annexed the upper bluff area, the unincorporated area is now 61 acres, not 100 acres.

<sup>2</sup> With Woodway’s annexation of the upper bluff, the BNRR no longer bisects the unincorporated portion.

The lowland area of this unincorporated island (see Fig. 2) is approximately 50 acres in size.<sup>3</sup> The only vehicular access to the lowland portion is to Point Wells is via<sup>4</sup> Richmond Beach Road and the regional road network via the City of Shoreline. However, there is potential easterly access through the Town of Woodway connecting to 116<sup>th</sup> Avenue West.<sup>5</sup>



**Figure 2— Upland and Lowland Areas at Point Wells**

[Note: Delete Figure 2 as there is no longer a need to identify the upland area vs. the lowland area. The View Corridor arrow should be moved to Figure 1 or the old Figure 3].

The upland area of the Point Wells Island (see Fig. 2) is approximately 37 acres in size. The upland does not have access to Richmond Beach Drive due to very steep environmentally sensitive slopes that separate the upland portion from the lowland portion. However, the upland portion does have potential easterly access through the Town of Woodway via 238<sup>th</sup> St. SW.<sup>6</sup>

All of the Point Wells Island was previously designated by the City of Shoreline as a "Potential Annexation Area" (PAA). The Town of Woodway, and Snohomish County, have previously identified all of the Point Wells unincorporated island as within the Woodway "Municipal Urban

<sup>3</sup> With Woodway's annexation of the upper bluff, there is no reason to distinguish between the upland and lowland area of the unincorporated island as the entire island is not the old lowland area.

<sup>4</sup> Again, no need to reference this as the lowland portion.

<sup>5</sup> The plan should recognize the second access road likely to be required by Snohomish County.

<sup>6</sup> With Woodway's annexation of the upper bluff, this paragraph is no longer needed.

~~Growth Area” (MUGA). The Washington State Court of Appeals, in a 2004 decision, determined that the overlap of Shoreline’s PAA and Woodway’s MUGA does not violate the provisions of the Growth Management Act. <sup>7</sup>~~

## **Snohomish County’s designation of Point Wells as an “Urban Center”**

In April of 2009, the Shoreline City Council adopted Resolution 285 which opposed the pending Snohomish County designation of Point Wells as an “Urban Center.” The resolution cited the likely excessive impacts of up to 3,500 dwelling units on Shoreline streets, parks, schools, and libraries. The City submitted several comment letters to the County Council detailing the reasons for the City’s opposition, reiterating the City’s support for a mixed use development of a more reasonable scale at Point Wells, and pointed out that an “Urban Center” designation would be inconsistent with provisions of the County’s plan as well as the Growth Management Act. Despite the City’s opposition, in 2009 Snohomish County rezoned Point Wells as an Urban Center, and in 2010 adopted an Urban Center Development Code that applies to all Urban Centers in Snohomish County.<sup>8</sup>

## **Designation of a Future Service and Annexation Area (FSAA) at Point Wells**

~~After a review of the topography and access options for Point Wells, the City of Shoreline no longer wishes to include the upland portion of this unincorporated island within its designated urban growth area. Because of the upland portion’s geographic proximity and potential for direct vehicular access to the Town of Woodway, the City of Shoreline concludes that the upland portion should be exclusively within the Town of Woodway’s future urban growth area. Any people living in future developments in the upland portion of the Point Wells Island would feel a part of the Woodway community because they would share parks, schools, and other associations facilitated by a shared street grid.<sup>9</sup>~~

~~Applying the same rationale to the lowland portion of the Point Wells Island, the City of Shoreline wishes to reiterate and clarify its policies. These lands all Although there is potential easterly access to Point Wells through the Town of Woodway connecting to 116<sup>th</sup> Avenue West, presently connect Point Wells is connected to the regional road network only via Richmond Beach Drive and Richmond Beach Road in the City of Shoreline. Therefore future re-development of ~~the lowland area~~ Point Wells<sup>10</sup> would be most efficiently, effectively, and equitably provided by the City of Shoreline and its public safety partners, the Shoreline Fire Department and Shoreline Police Department.~~

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<sup>7</sup> Deleted from this section and moved to the section titled Designation of a Future Service and Annexation Area (FSAA) at Point Wells.

<sup>8</sup> Confirms that the area was in fact designated as an Urban Center.

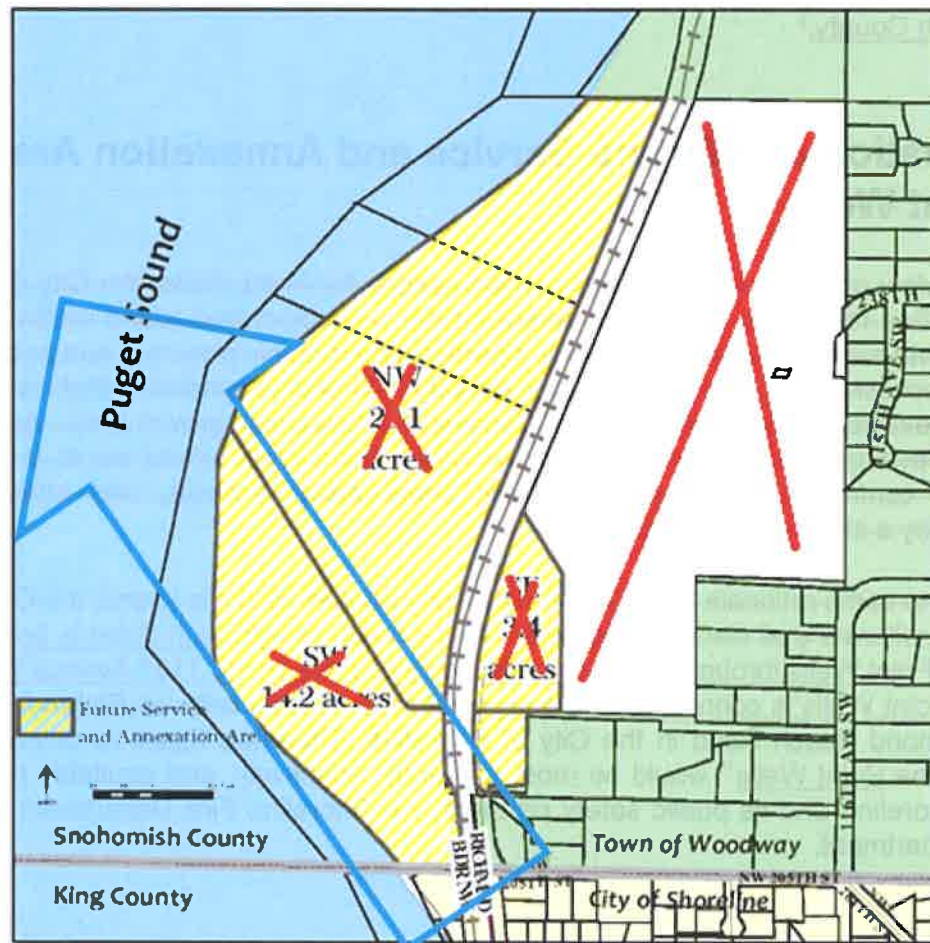
<sup>9</sup> This paragraph is no longer needed since Woodway has annexed the upland portion.

<sup>10</sup> The changes to this paragraph recognize that there is no longer a need to refer to a “lowland portion” as the upland portion is no longer part of the unincorporated island.

At such future time that the lowland portion of the Should Point Wells Island annexes annex<sup>11</sup> to the City of Shoreline, the urban services and facilities necessary to support mixed use urban development would be provided in an efficient and equitable manner. These would include police from the Shoreline police department and emergency medical services and fire protection from the Shoreline Fire Department. In addition, the City would be responsible for development permit processing, code enforcement, parks, recreation and cultural services, and public works roads maintenance.

Future residents of the lowland portion<sup>12</sup> of Point Wells would become a part of the Richmond Beach community by virtue of the shared parks, schools, libraries, shopping districts and road grid. As citizens of the City of Shoreline, they would be able to participate in the civic life of this "community of shared interests," including the City's Parks Board, Library Board, Planning Commission, or other advisory committees, and City Council.

*Policy PW-1 The Lowland Portion of the Point Wells Island<sup>13</sup>, as shown on Figure-3 Figure 2, is designated as the City of Shoreline's proposed future service and annexation area (FSAA)*



**Fig.-3 Fig. 2 – City of Shoreline Future Service and Annexation Area**

<sup>11</sup> No need to refer to the lowland potion.

<sup>12</sup> No need to refer to the lowland potion.

<sup>13</sup> No need to refer to the lowland potion.

[Revise Figure 2 to delete the indicated acreage figures. These figures are incorrect. The application submitted by the developer BSRE to Snohomish County and pages from the preliminary draft DEIS show that the Point Wells acreage is 61 acres. Also, in Figure 2, delete the depicted white-color Upland Area and show it as being part of the Town of Woodway (this revision reflects Woodway's recent annexation of land east of the BNRR). Finally, insert into this new Figure 2 the Public View Corridor graphic from previously numbered and to-be-deleted Figure 2 and its 100-foot and 200-foot elevation contours.]

## A Future Vision for Point Wells

The Subarea Plan, intended to be a 20-year plan document, envisions a Point Wells development that could take longer than 20 years to become fully realized once a permit is approved to develop the site.<sup>14</sup> Because of the time horizon of the plan and future development, the City, in its decision-making, should consider the long-term costs of near-term actions and make choices that reflect a long-term perspective.

The City's vision for Point Wells is a world class environmentally sustainable community, both in site development and architecture. The redevelopment of the site should be predicated on remediation of the contaminated soil, and the restoration of streams and native plant regimes appropriate to the shoreline setting. New site design and improvements should incorporate low impact and climate friendly practices such as alternative energy sources, vegetated roofs, rainwater harvesting, rain gardens, bioswales, solar and wind technologies. Development at Point Wells should exhibit the highest quality of sustainable architecture, striving for gold or platinum LEED (Leadership in Energy and Environmental Design) certification.

*Policy PW-2 The Vision for Point Wells is an environmentally sustainable mixed-use community that is a model of environmental restoration, low-impact and climate friendly sustainable development practices, and which provides extensive public access to the Puget Sound with a variety of trails, parks, public and semi-public spaces.*

Point Wells also represents a major opportunity to create a new subarea consistent with City objectives for economic development, housing choice, and waterfront public access and recreation. With almost 3,000 linear feet of waterfront, and sweeping 180 degree public views from Admiralty Inlet off Whidbey Island to Rolling Bay on Bainbridge Island, this site has unparalleled opportunity for public access, environmental restoration, education, and recreation oriented to Puget Sound.

The City's vision for Point Wells includes a mix of land uses, including residential, commercial, and recreational. The City recognizes that the site may be suited to a wide range of residential uses (e.g., market rate housing, senior housing, special needs housing, hotels, extended stay, etc.) as well as a range of commercial uses (e.g., office, retail, restaurant). Rather than proscribe the number or type of residential units, or the floor area of various types of commercial uses, the City prefers that flexibility be left to the developer to respond to market realities. However, whatever use mix is proposed must demonstrate that it conforms to adopted parking requirements, site design and building form policies cited below, and that generated traffic after mitigation does not exceed adopted city-wide level of service standards, and does not exceed the traffic limit for Richmond Beach Drive that is specified in this Subarea Plan.<sup>15</sup>

<sup>14</sup> Given the current timeline of several years before the hearing examiner makes a decision, and the likelihood of court appeals following the decision, the start of actual development is at least 5 years away.

<sup>15</sup> This confirms that the City's vision includes limiting traffic to maintain the City's LOS standards.

There are at least three distinct sub-areas within the FSAA, identified on Fig. 3 2 with the notations NW, SW, and SE. Because of their proximity to the single family neighborhoods to the east and south, maximum building heights in the SW and SE areas should be lower than in the NW subarea. Because of the large difference in elevation between the NW subarea and lands east of the railroad tracks, much taller buildings could be placed in this area without significantly impairing public views. Building placement in this area should avoid obstruction of the public view corridor shown on Fig. 2. The appropriate number, placement and size of taller buildings in NW subarea should be determined through the development permit and environmental review process.

The portion of the Puget Sound shoreline in the SW subarea is the most environmentally sensitive area and a candidate for habitat restoration. This area has sandy substrate, supports some beach grass and other herbaceous vegetation, and contains a fair amount of driftwood. This area should be a priority for open space and restoration including elimination of invasive plants, re-establishing native riparian and backshore vegetation.

*Policy PW-3 Use and development of and near the Puget Sound shoreline and aquatic lands at Point Wells should be carefully designed and implemented to minimize impacts and achieve long-term sustainable systems. New bulkheads or over-water structures should not be permitted and the detrimental effects of existing bulkheads should be reduced through removal of bulkheads or alternative, more natural stabilization techniques.*

Any improvements in the westernmost 200 feet (within the jurisdiction of the Shoreline Management Act) of the NW and SW subareas should be limited to walkways and public use or park areas. Outside that shoreline area, buildings should be located and configured to maintain as much openness and public views across the site as possible, with taller structures limited to the central and easterly portions.

*Policy PW-4 A public access trail should be provided and appropriate signage installed along the entire Puget Sound shoreline of the NW and SW subareas and secured with an appropriate public access easement document.*

The relatively lowland area west of the tracks (between 10 and 20 feet above sea level) is abutted east of the tracks by a heavily forested slope. See Fig. 1. The slope rises steeply (15% to 25% grades) from the railroad tracks to the top of the slope, which is at approximately elevation 200. See Figure 2. ~~The tree line at the top of the slope consists of mature trees from 50 to 100 feet in height, which further obscures public views of Point Wells from the portions of Woodway above elevation 200.~~<sup>16</sup>

*Policy PW-5 New structures in the NW subarea should rise no higher than elevation 200 150 or be no taller than 90 feet, whichever is less.*<sup>17</sup>

New buildings east of the railroad tracks would be much closer to existing single family homes in Woodway and Richmond Beach. To reflect this proximity, buildings of a smaller scale are appropriate.

<sup>16</sup> Many of the trees at the top of the slope are likely to be cut down as part of the Upper Bluff development.

<sup>17</sup> Building to the full 200 foot elevation would make the buildings visible to the residents of the Upper Bluff development, and the City should recognize the 90 foot building height limit contained in the County's Urban Village zoning regulations.



Policy PW-6 *New structures in the SE Subarea should rise no higher than six stories.*

In order to promote maximum openness on the site and prevent bulky buildings, the City should consider innovative regulations such as design standards and guidelines, building floor plate maxima, requiring a minimum separation between taller structures and the protection of public view corridors. Public views from city rights-of-way in the Richmond Beach neighborhood are a major part of the area's character, and provide a sense of place, openness, beauty and orientation. A prominent public view corridor across the lowland area, shown in Fig. 2, affords a public view from Richmond Beach Drive northwest to Admiralty Inlet and Whidbey Island. Placement and size of structures at Point Wells should be located and configured so as not obstruct this important public view corridor.

Policy PW-7 *The public view from Richmond Beach Drive in Shoreline to Admiralty Inlet should be protected by a public view corridor across the southwest portion of the NW and SW subareas. New structures in the and SW subarea and the southwest portion of the NW subarea should rise no higher than six stories.*<sup>18</sup>

Policy PW-8 *New structures in the NW subarea should be developed in a series of slender towers separated by public view corridors.*

## **Transportation Corridor Study and Mitigation**

A traffic and safety analysis performed by the City in the summer of 2009 evaluated the nature and magnitude of impacts likely to accrue from the development of Point Wells as an "Urban Center" under Snohomish County zoning, as well as development scenarios assuming lesser orders of magnitude. This background information provided a basis for the City to conclude that, prior to the approval of any specific development project at Point Wells, the applicant for any development permit at Point Wells should fund, and the City oversee, the preparation of a detailed Transportation Corridor Study.

### **Corridor Study**

The Transportation Corridor Study and Implementation Plan should include an evaluation of projected impacts on vehicular flow and levels of service at every intersection and road segment in the corridor. If a potential alternative access scenario is identified, it should be added to the corridor study. The Study should also evaluate and identify expanded bicycle and pedestrian safety and mobility investments, and identify "context sensitive design" treatments as appropriate for intersections, road segments, block faces, crosswalks and walkways in the study area with emphasis on Richmond Beach Road and Richmond Beach Drive and other routes such as 20<sup>th</sup> Ave. NW, 23<sup>rd</sup> Place NW, NW 204<sup>th</sup> Street and other streets that may be impacted if a secondary road is opened through Woodway.

### **Implementation Plan**

The corridor study would be a step in the development of such a plan. The scope of the implementation plan should include a multimodal approach to mobility and accessibility to and from Point Wells, as well as detailed planning for investments and services to improve multimodal travel for adjacent communities between Point Wells and I-5. This could well include an integrated approach to accessing Point Wells, the Richmond Beach neighborhood, and Richmond Highlands with the Bus Rapid Transit system along Aurora Avenue, the I-5 corridor

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<sup>18</sup> The height limitation in the view corridor helps preserve the views from existing neighborhoods. (Ord. 649; 596; 571)

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itself - focusing on the interchanges at N. 205<sup>th</sup> and N. 175<sup>th</sup> , as well as the Sound Transit light rail stations serving Shoreline.

While the analysis of vehicle flows is appropriate as part of the study, the solutions should provide alternatives to vehicle travel to and from Point Wells - as well as more transportation choices than those that currently exist today for the Richmond Beach neighborhood and adjacent communities.

*Policy PW-9 To enable appropriate traffic mitigation of future development at Point Wells, the developer should fund the preparation of a Transportation Corridor Study as the first phase of a Transportation Implementation Plan, under the direction of the City, with input and participation of Woodway, Edmonds, Snohomish County and WSDOT. The Study and Transportation Implementation Plan should identify, engineer, and provide schematic design and costs for intersection, roadway, walkway and other public investments needed to maintain or improve vehicular, transit, bicycle and pedestrian safety and flow on all road segments and intersections between SR 104, N 175<sup>th</sup> Street, and I-5 with particular attention focused on Richmond Beach Drive and Richmond Beach Road. Road segments that would be impacted by an alternate secondary access through Woodway should also be analyzed, which would include 20<sup>th</sup> Avenue NW, 23<sup>rd</sup> Place NW and NW 204<sup>th</sup> Street. The Study and Transportation Plan should identify needed investments and services, including design and financing, for multimodal solutions to improving mobility and accessibility within the Richmond Beach neighborhood and adjacent communities, including but not limited to investments on Richmond Beach Drive and Richmond Beach Road.*

*Policy PW-10 The needed mitigation improvements identified in the Transportation Corridor Study and Implementation Plan should be built and operational concurrent with the occupancy of the phases of development at Point Wells.*

Richmond Beach Road and Richmond Beach Drive provide the only vehicular access to Point Wells at this time. Therefore, it is critical that identified impacts be effectively mitigated as a condition of development approval. It is also vital that the traffic generated from Point Wells be limited to preserve safety and the quality of residential neighborhoods along this road corridor. In the event that secondary vehicular access is obtained through Woodway to the Point Wells site, the mitigation and improvements of the impacts to those additional road segments must also occur concurrent with the phased development.

Historically, mobility and accessibility in Richmond Beach and adjacent communities has been dominated by the single occupancy vehicle. Provision of bicycle and pedestrian facilities has been limited because retrofitting an existing road network with these facilities is an expensive undertaking. The Richmond Beach Road corridor is served by limited Metro bus service and is beyond a reasonable walking distance from potential development within Point Wells. Though rail service to a station in Richmond Beach was evaluated by Sound Transit, no service is envisioned in the transit agency's adopted 20 year plan. Improved transit, bicycle and pedestrian mobility is a long-term policy objective, but the majority of trips in the area will likely continue to be by automobiles utilizing the road network. The City's traffic study completed in 2009, assuming a 4-lane Richmond Beach Road,<sup>19</sup> shows that if more than 8,250 vehicle trips a day enter the City's road network from Point Wells, it would result in a level of service "F" or worse at a number of City intersections. The City's Transportation Improvement Plan has scheduled Richmond Beach Road from 24<sup>th</sup> Ave NW to Dayton Ave. N to be rechanneled from

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<sup>19</sup> It is important to note that previous traffic studies did not consider the amount of traffic that a 3-lane configuration of Richmond Beach Road could handle.

4 lanes to 3 lanes in 2018. The rechannelization will reduce the capacity of this road segment so that current excess capacity is about 4,000 vehicle trips per day. If more than this number of vehicles enter Richmond Beach Road from Point Wells, it will result in a volume-to-capacity (v/c) ratio of over .90 on several City road segments and a level of service "F" or worse as a number of City intersections.<sup>20</sup> This would be an unacceptable impact incapable of being mitigated with Richmond Beach Road remaining at three lanes.

*Policy PW-11 The City should address opportunities to improve mobility, accessibility, and multimodal east-west movement in the Richmond Beach Road Corridor between Puget Sound and I-5 as part of the update of the city-wide Transportation Management Plan. The City should also work with neighboring jurisdictions Woodway and Edmonds to improve north-south mobility. These opportunities should be pursued in a manner that reduces existing single occupancy vehicle trips in the corridor.*

*Policy PW-12 In view of the fact that Richmond Beach Drive between NW 199th St. and NW 205th St. is a local road with no opportunities for alternative access to dozens of homes in Shoreline and Woodway, the City designates this as a local street with a maximum capacity of 4,000 vehicle trips per day. ~~Unless and until 1) Snohomish County and/or the owner of the Point Wells Urban Center can provide to the City the Transportation Corridor Study and Mitigation Plan called for in Policy PW-9, and 2) sources of financing for necessary mitigation are committed, the City should not consider reclassifying this road segment.~~*<sup>21</sup>

*Policy PW-13 With a 3-lane Richmond Beach Road, there is little excess traffic capacity under the City's 0.90 V/C standard for arterials. While the City generally supports a mixed-use development at Point Wells, the City does not support a development at Point Wells that would result in traffic measured at any point along Richmond Beach Road exceeding the City's 0.90 V/C standard. While certain mitigations may lessen the likelihood of the City's 0.90 V/C standard being exceeded, the City rejects increasing the City's 0.90 V/C standard for Richmond Beach Road (e.g., increasing it to 0.95 or higher) as a possible mitigation measure, and the City rejects acquiring private property in order to widen Richmond Beach Road to five lanes as a mitigation measure, and the City rejects as a mitigation measure reverting Richmond Beach Road to four lanes which would jeopardize the public's health and safety especially with increased traffic from Point Wells.*<sup>22</sup>

## Interjurisdictional Coordination

The City should work with the Town of Woodway and Edmonds to identify ways in which potential future development ~~in the lowland portion~~ of Point Wells could be configured or mitigated to reduce potential impacts on Woodway. ~~There is no practical primary vehicular access to the lowland part of Point Wells other than via Richmond Beach Road. However, the City should work with property owners and Woodway to provide a bicycle and pedestrian route between Woodway and Point Wells.~~<sup>23</sup>

<sup>20</sup> The Subarea Plan should recognize that RB Road is scheduled to be rechanneled to 3 lanes in 2018.

<sup>21</sup> The plan should not make promises to the future developer about changing the classification of RB Drive. Removing this sentence does not prevent the City from reclassifying the road if that makes sense in the future.

<sup>22</sup> Adding a new policy restates the City's LOS standards and position on acceptable mitigation for increased traffic on RB Road.

<sup>23</sup> With the likelihood of a second access road through Woodway, this sentence is no longer accurate.

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The Growth Management Act states that cities, rather than county governments, are the preferred providers of urban governmental services. Because urban governmental services and facilities in Shoreline are much closer to Point Wells than are similar services and facilities located in Snohomish County, it is most efficient for the City to provide those services.

Working with its public safety partners, Shoreline Fire Department and Shoreline Police Department, the City should invite Snohomish County to discuss an interlocal agreement to address the timing and methods to transition local governmental responsibilities for Point Wells from the County to the City. Included in these discussions should be responsibilities for permitting and inspection of future development at Point Wells, and possible sharing of permitting or other local government revenues to provide an orderly transition.

*~~Policy PW-13 14 The City should work with the Town of Woodway, City of Edmonds and Snohomish County toward adoption of interlocal agreements to address the issues of land use, construction management of, urban service delivery to, and local governance of Point Wells. A joint SEPA lead-agency or other interlocal agreement with the County could assign to the City the responsibility for determining the scope, parameters, and technical review for the transportation component of the County's Environmental Impact Statement prepared for a future project at Point Wells. Under such agreement, this environmental analysis, funded by the permit applicant, could satisfy the policy objectives of the Transportation Corridor Study and Implementation Plan referenced at PW-10.~~<sup>24</sup>*

*Policy PW-14 15 In the event that development permit applications are processed by Snohomish County, the City should use the policies in this Subarea Plan as guidance for identifying required mitigations through the SEPA process and for recommending changes or additional permit conditions to achieve greater consistency with the City's adopted policies.*

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<sup>24</sup> This section is no longer needed as the County has continued forward with the Transportation component of the EIS without the City's Transportation Corridor Study.