

**CITY OF SHORELINE HEARING EXAMINER
FINDINGS, CONCLUSIONS AND DECISION**

PROPOSAL INFORMATION SUMMARY

Application: Master Development Plan
File Number: 201859
Applicant: Shoreline Community College
Recommendation: Approve with conditions
Public Hearing: April 22, 2014

Introduction

The Hearing Examiner held a public hearing on the application on April 22, 2014, in Council Chambers at Shoreline City Hall, 17500 Midvale Avenue North in Shoreline. Shoreline Community College ("The Applicant" or "SCC") was represented by Brent Carson, attorney-at-law; and the Planning and Development Services Department was represented by Steven Szafran, Senior Planner. Two documents received at the hearing were marked as Exhibits 7 and 8, respectively, and added to the record. The Hearing Examiner inspected the site on April 28, 2014.

For purposes of this decision, all section numbers refer to the Shoreline Municipal Code (SMC or Code) unless otherwise indicated. After considering the evidence in the record, the Examiner enters the following findings of fact, conclusions and decision on the application.

Findings of Fact

Site and Vicinity

1. The applicant, Shoreline Community College, seeks approval of a Master Development Plan to guide campus development over the next 15 years. See Exhibit 1, Attachment 1. The campus is approximately 80 acres in size. It is located just north of N 160th Street and approximately one-half mile west of commercial development along Aurora Avenue N and N 160th Street. The campus is bordered by Boeing Creek Park on the north, Innis Arden Way on the south/southwest, Shoreview Park and a city parking lot on the west, and Carlyle Hall Road NW and Greenwood Avenue N on the east.
2. The Comprehensive Plan designation for the site is Campus and it is zoned Shoreline Community College Zone (SCZ).

3. Approximately 30 acres of the campus are developed with 26 small, one-story buildings, parking areas and driveways. Most of the buildings were constructed between 1964 and 1992. A track and field are located in the northwest corner of campus. The undeveloped portions of the site consist primarily of dense forest areas, including habitat for priority species, and other designated critical areas, including wetlands, streams, steep slopes and erosion hazard areas.
4. Surrounding property is designated Low Density Residential and zoned R-4 and R-6. It is developed with city parkland to the north and west, a public elementary school to the south, and single-family residences to the northeast, east and southwest.

Proposal

5. The MDP shows two phases of development. Phase I proposes construction of a three- to four-story, 145,000 square foot, 400-bed student housing building located on the northeast part of the property that is now occupied by the field and track. Parking required by the Code would be located on the southwest part of the same parcel. Campus parking lots would be reconfigured without increasing parking capacity, and landscaping and internal roadways to the housing would be added.
6. The property on which the housing is constructed would be sold to a private entity with the Applicant signing a long-term ground lease, and the housing would be open only to SCC students. The Applicant expects full build-out of Phase I by 2015-2016.
7. The Applicant anticipates that most of the housing occupants will be full-time international students. The housing will include food services, laundry facilities, gathering spaces, study areas and a residence life program. The Applicant intends to hire full-time paid management for the housing and to increase the security presence on campus. Resident students will receive bus passes from SCC and will not be permitted to park cars on the campus.
8. Phase II of the MDP includes three projects that are not yet funded. Project 2a involves demolition of five existing buildings and construction of the 70,000 square foot Allied Health and Science Building 1, for a net addition of 23,148 square feet. Project 2b includes demolition of two existing buildings and construction of the 40,682 square foot Allied Health and Science Building 2, for a net addition of 16,823 square feet. Project 2c involves construction of a 32,400 square foot expansion to the existing Automotive Technology building. The MDP would add a total of approximately 218,000 square feet of building area to the campus. The MDP, Attachment 1 to Exhibit 1, the Staff Report, includes additional details about the phased development plan at pages 34-37.
9. The Applicant is not proposing new industrial, commercial or laboratory uses on the campus.
10. A Critical Areas Reconnaissance Report was prepared in conjunction with development of the MDP, *see* exhibit 1, attachment 6, and the MDP addresses critical areas at pages 16-21. The MDP includes no tree cutting or development within critical areas or their buffers. Several of the

Applicant's proposed SEPA mitigation measures address protection of critical areas during implementation of the MDP. Exhibit 1, Attachment 11.

11. The State of Washington requires the use of "green" construction for all structures that receive state funding. SCC's Long Range Development Plan includes as a priority implementation of SCC's commitment to an environmentally sustainable campus, and SCC intends to employ sustainable practices to orient design, construction and site development toward energy efficiency.

12. Water, sewer and stormwater improvements are discussed at pages 34 and 39-40 of the MDP. A new water main will be extended through the campus interior to serve the new student housing building as well as the new Allied Health Buildings and expanded Automotive Technology Building. New fire hydrants will be installed and connected to the new main. A new sewer main and side sewers will be constructed along with an on-site sewer lift station to remove sewage from the new student housing building.

13. The existing campus drainage system does not meet current City stormwater management requirements for new development and redevelopment. The Applicant proposes to install additional pipe system, stormwater detention and infiltration, and water quality treatment improvements that will use low impact development techniques to the greatest extent feasible and be constructed incrementally as the buildings are constructed.

14. The City's Public Works Department reviewed the MDP and concluded that with conditions, there will be adequate public services to serve the proposed development.

15. The proposed new buildings will not exceed four stories and are all interior to the existing campus and located away from single family neighborhoods. The building closest to a single-family residential area will be approximately 700 feet away, and the proposed building sites are lower than the surrounding single-family neighborhoods. The MDP incorporates site design priorities at page 44.

16. The existing landscape screen along the campus boundary will remain, and interior landscaping is proposed adjacent to new buildings and parking areas. The Applicant proposes to increase pedestrian safety on campus on a project by project basis by separating pedestrian and vehicular circulation routes in parking lots and improving primary internal vehicular circulation routes to reduce roadway crossings and conflicts with pedestrian routes.

17. Facilities for pedestrians, including ADA access, between SCC and the commercial development on Aurora Avenue N are substandard or non-existent. There are no sidewalks on any of the three rights-of-way surrounding the campus. See Exhibit 1, Attachment 15. The Applicant has agreed to make phased pedestrian improvements requested by the Department.

18. The Applicant provided a Transportation Technical Report (“Traffic Report”) that examined existing traffic conditions and projected future traffic conditions both with and without the proposed campus development. Exhibit 1, Attachment 16.

19. The City has adopted a standard of LOS D for unsignalized intersections on arterials. SMC 20.60.140.A.

20. The Traffic Report shows that in 2025, without the MDP, the unsignalized intersection of Greenwood Avenue and Innis Arden Way would function at a level of service (LOS) C, and the unsignalized intersection of Carlyle Hall Road and Dayton Avenue would function at LOS E. Exhibit 1, Attachment 16 at 25.

21. The MDP is expected to generate 50 AM peak hour trips through the Greenwood Avenue/Innis Arden Way intersection and 11 trips through the Carlyle Hall Road/Dayton Avenue intersection.

22. The Traffic Report shows that in 2025 with the MDP, but without a Transportation Demand Management Plan (TDMP) for SCC, the Greenwood Avenue/Innis Arden Way intersection would drop to LOS E, and the Carlyle Hall Road/Dayton Avenue intersection would continue to operate at LOS E. Exhibit 1, Attachment 16 at 31.

23. The Applicant prepared a TDMP that would require bi-annual counts and reporting of parking capacity on campus, increase the cost of campus parking, increase transit subsidies for students, faculty and staff, subsidize the cost of a Residential Parking Zone in the surrounding neighborhood, bring a car-share program to campus, and take other steps to reduce single occupancy vehicle impacts both on and off campus.

24. The goal of the TDMP is to reduce parking demand from .33 stalls per full time equivalent student (FTE) to .30 stalls per FTE, approximately a 10% reduction.

25. The total projected campus parking demand is 1,665 spaces, and the total parking provided on-campus is 1670 stalls. In addition, the Applicant will continue to provide 210 stalls of leased parking in the nearby Sears lot, or in other available locations in the immediate vicinity.

26. After reviewing the TDMP, the Applicant’s traffic engineer determined that the TMP could achieve the desired reduction in the existing and projected number of trips generated by SCC.

27. The engineer recalculated the MDP’s impact on the two problem intersections, using 2013 traffic counts provided by the Department, both with and without the TDMP. The new calculations appear in a supplement to the Traffic Report. They show that in 2025, with or without the TDMP, the Greenwood/Innis Arden intersection would operate at LOS C, and the Carlyle Hall Road/Dayton Avenue intersection would operate at LOS F. However, with the TDMP, total SCC-generated trips through the Greenwood/Innis Arden intersection would be

reduced by 27, and total SCC-generated trips through the Carlyle Hall Road/Dayton Avenue intersection would be reduced by 6. Exhibit 1, Attachment 17.

28. There are wide shoulders adjacent to travel lanes on Innis Arden Way but no signed bicycle facilities around SCC. The City's Transportation Master Plan identifies a designated bicycle lane along N 160th Street and a signed bicycle route around the SCC campus on Innis Arden Way and Greenwood Avenue N.

29. Five King County Metro transit routes presently serve SCC with connections to downtown Seattle, Lake City Way, Cascadia Community College, and North Seattle Community College and the Northgate Transit Center.

Department Review

30. The Department reviewed the application and conducted meetings for public input on December 8, 2010, April 9, 2013 and April 23, 2013. The Department prepared a public Notice of Application that was posted on-site, mailed to all residents within 1000 feet, and published in the *Seattle Times* on May 12, 2011. A second Notice of Application, amended to include the proposed student housing, was posted on-site, mailed to all residents within 1000 feet, posted on the City's website and cable access channel, and published in the *Seattle Times* on June 27, 2013. The Department also issued a notice of the Hearing Examiner's hearing on April 1, 2014, which was mailed to all property owners within 1000 feet of SCC, posted on-site and on the City's website and cable access channel, and advertised in the *Seattle Times*.

31. Comments received at the public meetings raised concerns with traffic, parking, stormwater, noise, student behavior, and other issues. The comments are summarized in Exhibit 1 at 4-5, and Attachment 7 to Exhibit 1 includes a summary of the comments and the Applicant's responses to them. Attachment 9 to Exhibit 1 includes the public comments received in response to the second Notice of Application.

32. King County Metro submitted comments on the MDP that recommended increased parking prices on campus, upgraded infrastructure for pedestrians and bicycles, transit passes, parking enforcement, a parking management plan, revisions to the bus circulation route, and increased layover capacity. Exhibit 1, Attachment 10.

33. Acting as lead agency under the State Environmental Policy Act (SEPA), the Applicant issued a Final Environmental Impact Statement (FEIS) for its Long Range Development Plan on June 20, 2006. A SEPA Addendum was issued on March 9, 2011, and considered replacing SCC's concept master plan with their Long-Range Development Plan and the proposed MDP. A second Addendum was issued on February 8, 2013, that considered amending the Long-Range Development Plan to include on-campus student housing. Noise impacts would normally have been addressed in the SEPA Addendums, which were not appealed.

34. The FEIS and SEPA Addendums proposed various mitigation measures to address the environmental impacts of the MDP. Those measures are listed in Exhibit 1, Attachment 11, and were incorporated into Section VII of the proposed MDP.

35. The Department analyzed the application and public comments and recommended that the MDP be approved with conditions. Exhibit 1. At hearing, the Department produced a revised set of proposed conditions of approval. Exhibit 4. The Applicant disputes the Department's proposed conditions relating to traffic mitigation, *see* Exhibit 3, and submitted proposed revisions to the Department's proposed traffic conditions. Exhibit 7.

36. The six members of the public who testified at the public hearing expressed concern about the extent of the notice given for the hearing, the impact of additional students with cars on the already congested intersection of Innis Arden Way and Greenwood Avenue N, the inability of students and neighbors to continue using the track and field area, and the housing of students on a campus located adjacent to single-family residential areas.

Conclusions

1. Under SMC 20.30.060, the Hearing Examiner holds a public hearing and makes a final decision on a major development plan application.

2. The Department met the Code's requirements for notice of the MDP application and hearing. SMC 20.30.060.C requires notice by mail, newspaper and posting the site. SMC 20.30.120.C requires that the mailing be sent to residents and property owners within 1000 feet of the proposed site; that signs be posted on all sides of the proposed site; and that notice be published in a newspaper of general circulation in the area of the project and include the project location, description, type of permit required, comment period dates, and the location where the complete application may be reviewed. SMC 20.30.180 requires that the notice of hearing also be posted on the City's website and cable access channel. The Department's notice met or exceeded all Code requirements.

3. The Applicant's decision to replace the existing track and field with student housing is a policy choice that is not governed by City Code.

4. SMC 20.30.353 regulates master development plans, and SMC 20.30.353.B lists the decision criteria for a master development plan. The first criterion requires that SCC's property be designated as campus, and that the MDP be consistent with the goals and policies of the Comprehensive Plan. As noted above, the property is designated Campus. The Staff Report analyzes the MDP's consistency with a list of Comprehensive Plan goals and policies. Exhibit 1 at 7-9. The list is incorporated by reference with the exception of the following goals and policies, which relate only to the City's regulatory authority or have no relationship to the proposal: LU8, Goal HII, Goal HIII, Goal TII, and Policy T3. As conditioned, the MDP, together with the TDMP, is consistent with the applicable Plan goals and policies.

5. The second criterion requires that the MDP include a general phasing timeline of development and assessed mitigation. The MDP includes a general phasing timeline of development and SEPA mitigation measures. In addition, the Applicant has agreed to phased pedestrian improvements to address the deficiencies in sidewalks for pedestrians walking between the campus and the commercial centers on Aurora Avenue N. As conditioned, the MDP will meet the second criterion for approval.

6. As conditioned to limit tree removal, the MDP will meet the third criterion, which requires that the MDP meet or exceed the current regulations for critical areas.

7. The fourth criterion requires that the proposed development use "innovative, aesthetic, energy efficient and environmentally sustainable architecture and site design (including low impact development stormwater systems and substantial tree retention) to mitigate impacts to the surrounding neighborhoods." As noted, the proposed stormwater system will use low impact development techniques to the greatest extent feasible. In addition, the Code requires all stormwater improvements to comply with regulations in effect at the time an application is filed and emphasizes Best Management Practices. Conditions will require compliance with a green building certification program and limit tree cutting. As conditioned, the MDP will meet the requirements of criterion four.

8. Criterion five requires that there be

sufficient capacity and infrastructure (e.g., roads, sidewalks, bike lanes) in the transportation system (motorized and nonmotorized) to safely support the development proposed in all future phases or there will be adequate capacity and infrastructure by the time each phase of development is completed. If capacity or infrastructure must be increased to support the proposed master development plan, then the applicant must identify a plan for funding their proportionate share of the improvements.

9. At present, there is sufficient transit and bicycle capacity and infrastructure to support development under the proposed MDP. Many of the suggestions from King County Metro have been incorporated into the TDMP. The required sidewalk and related improvements will provide sufficient capacity and infrastructure for pedestrian traffic.

10. The City's concurrency requirements are set forth in SMC 20.60.140. The purpose of that section is "to ensure that public streets maintain an adequate level of service (LOS) as new development occurs." As noted above, the City has determined that a LOS D is an adequate level of service for the intersections at issue with this MDP application. SMC 20.60.140.B requires that "[a]ll new *proposals* for development *that would generate 20 or more new trips*" during the appropriate peak hour submit a traffic study. (Emphasis added). SMC 20.60.140.C provides that a proposed development *that will have a "direct traffic impact" that causes a roadway or intersection "to exceed the adopted LOS standards, or impacts an intersection ...*

currently operating below” an adequate LOS, “will not meet the City’s establish concurrency threshold and shall not be approved unless:

1. The applicant agrees to fund or build improvements within the existing right-of-way that will attain the LOS standards; or
2. The applicant achieves the LOS standard by phasing the project or using transportation demand management (TDM) techniques.

11. The MDP will generate more than 20 new peak hour trips, and the Applicant submitted a traffic study. The Traffic Report showed that the MDP would have a direct traffic impact that would cause the intersection of Innis Arden Way and Greenwood Avenue N to exceed the adopted LOS Standard. The Traffic Report showed that the MDP would impact the intersection of Carlyle Hall Road and Dayton Avenue N, which was already operating at LOS E, below the adopted standard. Therefore, the Applicant was required by SMC 20.60.140 to build or fund right-of way improvements necessary for the intersections to attain LOS D, or to achieve the LOS standard by phasing the project or using TDM techniques.

12. As noted, the Applicant developed a TDMP, and the traffic engineer's analysis of the TDMP shows that it "could reduce the existing and forecasted number of trips generated by the college by 10%." Exhibit 1, Attachment 17. As a result, the MDP would not generate any new trips and thus, would not have a "direct traffic impact" on the Innis Arden Way/Greenwood Avenue N intersection. Similarly it would not "impact" the Carlyle Hall Road/Dayton Avenue N intersection. Therefore, under SMC 20.60.140, the MDP has met the City’s concurrency requirements, and traffic mitigation is not required.

13. The Department acknowledges that with the TDMP, there is no requirement for traffic mitigation but states that "should the TDMP not obtain the desired results and the trips from the SCC increase, the SCC is responsible for traffic mitigation in order to meet the City standard for concurrency." Exhibit 1 at 16. It is understandable that the Department would want some type of assurance that the TDMP will actually achieve the requisite trip reduction. However, the Code does not provide authority for measuring a MDP’s traffic impacts at various intervals during its implementation and imposing traffic mitigation requirements if it is found to have impacts that were not foreseen at the time of approval. The assurance the Department seeks is identified in the TDMP itself and consists of the Department’s authority to withhold permit approvals for MDP-related developments if the Applicant fails to meet the parking and trip targets specified in the TDMP. In that event, the Applicant may accept its inability to complete implementation of the MDP or decide to seek a major amendment to the MDP, or it may agree to mitigation measures that would allow development under the MDP to proceed. As conditioned, the MDP meets the fifth criterion for approval.

14. The sixth criterion requires that there be "sufficient capacity within the public services such as water, sewer, and stormwater to adequately serve the development proposal in all future phases, or there will be adequate capacity available by the time each phase of development is

completed." The evidence in the record shows that there will be sufficient capacity within the public services to adequately serve the development proposal and all future phases.

15. Criterion seven requires that the MDP contain "architectural design ... and site design standards, landscaping, provisions for open space and/or recreation areas, retention of significant trees, parking/traffic management and multimodal transportation standards that minimize conflicts and create transitions between the proposal site and adjacent neighborhoods and between institutional and residential uses." The discussion of this criterion in the Staff Report at pages 18-19 is incorporated by reference. The evidence shows that as conditioned, the MDP will meet the requirements of criterion 7.

16. Criterion 8 concerning proposed industrial, commercial or laboratory uses is not applicable to the proposed MDP.

17. SMC 20.30.353 sets forth the nine development standards for an MDP. The Staff Report's discussion of these standards as applied to the MDP (pages 20-22) is incorporated by reference. The MDP will comply with all development standards.

Decision

The MDP is APPROVED subject to the following conditions:

Sections VI and VII of the Master Development Plan are deleted and replaced with the following conditions:

1. Shoreline Community College shall provide 1,670 on-campus parking spaces during all phases of the Master Development Plan. At no time shall there be fewer than 1,670 on-campus parking spaces.
2. Shoreline Community College shall comply with all measures listed in the Transportation Demand Management Plan (TDMP) (Exhibit 1, Attachments 13 and 17).
3. Shoreline Community College shall comply with the following Phasing and Improvement Plan:

Phasing and Improvement Plan

The City's requirements for frontage improvements are found on the Phasing and Improvement Map (Exhibit 1, Attachment 12) and are outlined below. Phase 1 improvements shall be applied for at the same time as the student housing building and installed before a Certificate of Occupancy will be issued by the City for the student housing building. Phase 2 improvements shall be completed prior to the end of the MDP vesting period, 15 years from the date of issuance of the MDP permit.

Pedestrian Improvements
 Phase 1

Location	Requirement	Comment
Shoreline Community College NW Innis Arden Way Main Entrance to Greenwood Ave N	Standard section: 8'sidewalk with 5' amenity zone	The City will consider deviations for site specific limitations such as topography or right of way
East side of Greenwood Ave N between NW Innis Arden Way and N 160th St	Standard 5' sidewalk and 5' amenity zone	The City will consider deviations for site specific limitations such as topography or right of way
North side of N 160th Street between Greenwood Ave N and Dayton Ave N	Standard 5' sidewalk and 5' amenity zone	The City will consider deviations for site specific limitations such as topography or right of way
Intersection of Greenwood Ave N, NW Innis Arden Way and N 160 th St	ADA Accessibility on all corners including curb ramps, landings, etc.	The applicant's Engineer can prepare Maximum Extent Feasible (MEFs) if specific site conditions such as right of way, existing slopes, etc., make it difficult to fully meet ADA standards

The first phase, triggered by development of the dormitory, will develop the pedestrian connections from: Shoreline Community College's NW Innis Arden Way Main Entrance to Greenwood Ave N; along the east side of Greenwood Ave N between NW Innis Arden Way and N. 160th St intersection; along N 160th St between Dayton Ave N and Greenwood Ave N; and improve ADA accessibility at the Greenwood Ave N/N 160th St intersection. These improvements will allow continuous ADA access from the N 160th/Dayton Ave N intersection to the SCC.

Phase 2

Location	Requirement	Comment
Shoreline Community College NW Innis Arden Way Main Entrance to westernmost driveway off of NW Innis Arden Way	Standard section: 8'sidewalk with 5' amenity zone	The City will consider deviations for site specific limitations such as topography or right of way

Phase 2 improvements will complete the ADA accessible route constructed as Phase 1 along NW Innis Arden Way from the SCC main entrance to Greenwood Ave N. Phase 2

improvements shall be completed by the end of the MDP timeframe – 15 years from the date of issuance of the MDP permit.

Traffic Mitigation

The SCC's traffic report shows one intersection (Dayton Avenue/Carlyle Hall Road) operating below adopted LOS standards in the future with the MDP. The current traffic analysis indicates the Traffic Demand Management Plan (TDMP) (Exhibit 1, Attachments 13 and 17) will reduce trips. Therefore, additional traffic mitigation is not required. However, should the TDMP fail to meet projected LOS and traffic volumes as stated in the traffic report, development under the MDP may not proceed.

- A. Shoreline Community College shall implement the TDMP (Exhibit 1, Attachments 13 and 17). The goal of the TDMP is to reduce the parking demand from commuting students, faculty and staff to 0.30 stalls per commuting student FTE ("Parking Target"). In addition to reducing parking demand, achieving the Parking Target is expected to result in a 10% trip reduction ("Trip Target") as described in the March 24, 2014, letter from TSI (Trip Target for Greenwood/Innis Arden = 994 and Trip Target for Dayton/Carlyle Hall = 1194)(Exhibit 1, Attachment 17). This reduction of trips going through Innis Arden/Greenwood and Carlyle Hall/Dayton intersections is intended to offset any increases in trips created by the MDP projects.
 - B. Shoreline Community College shall prepare bi-annual monitoring reports to demonstrate the effectiveness of the TDMP in regards to achieving the Parking Target and the Trip Target. The reports shall contain the information denoted in the TDMP, Attachment 17, Monitoring and Compliance Item 1.
 - C. If the City determines two out of the three consecutive monitoring reports show the TDMP is failing to meet both Targets (Parking and Trip Targets) Shoreline Community College shall adopt and submit to the City by the following quarter amendments to the TDMP designed to achieve the Targets. Shoreline Community College shall continue to monitor the effectiveness of the TDMP by providing bi-annual monitoring reports and show satisfactory progress towards the Targets.
 - D. If, after amending the TDMP, Shoreline Community College continues to fail in meeting the Targets, the City may withhold building permit approvals for any of the developments proposed in the MDP.
4. Shoreline Community College shall subsidize the cost of residential permits for new and existing Residential Parking Zones (RPZ) that are implemented by the City as a result of spillover parking from Shoreline Community College in nearby neighborhoods that triggers established criteria for RPZ formation. The City will administer RPZ permitting on an as needed basis. Shoreline Community College shall subsidize the cost of the RPZ permit fees

up to \$2,000 dollars per year for the life of the MDP prorated based on the date of MDP issuance.

5. Shoreline Community College shall construct all new buildings on campus to comply with a State-mandated green building certification programs such as LEED or a comparable green building rating system.


6. Tree removal is prohibited in forested areas as shown in Attachment 14 except for those areas shown in Attachments 2 and 3.

7. Tree removal is limited to areas shown in Attachments 2 and 3 – the areas shown for future development.

8. All SEPA Mitigation Measures, as recommended by Shoreline Community College and listed in Attachment 11, shall be implemented.

9. Shoreline Community College's request for extended vesting under SMC 20.30.353.C is approved. The Master Development Plan shall vest for a period of 15 years after issuance.

Entered this 5th day of May, 2014.


Sue A. Tanner
Hearing Examiner

Concerning Further Review

The decision of the Hearing Examiner in this case is the final decision of the City of Shoreline. SMC 20.30.250 provides that any judicial appeal of the decision "shall be filed in accordance with State law. If there is not a statutory time limit for filing a judicial appeal, the appeal shall be filed within 21 calendar days after a final decision is issued by the City."