

# Chapter 4

## Responses to Comments on the Draft EIS FINAL ENVIRONMENTAL IMPACT STATEMENT

# Chapter 4—Responses to Comments on the DEIS and DEIS Addendum

This chapter of the Final Environmental Impact Statement (FEIS) responds to comments received on the Draft Environmental Impact Statement (DEIS) and the Addendum to the DEIS. The comment period on the DEIS was January 17-February 19, 2015. The comment period on the Addendum to the DEIS was February 19-March 21, 2016. This chapter also includes responses to spoken testimony offered at public meetings held during open comment periods. Responses to comments on zoning alternatives received April 7 2015 also are provided.

## Responses to Comments on the DEIS

### *Responses to Common Themes in the DEIS Comments*

Many of the comments on the DEIS related with similar themes. These common themes are summarized and responded to in the list below. These thematic responses also are referenced in specific responses to individual comments, included later in this chapter.

### **Factors that Influenced Potential Zoning Scenarios**

Several comments stated that the zoning scenarios presented in the DEIS showed potential building heights and other elements that were not representative of what residents recommended in the design workshops in May and June 2015.

A summary report of the design workshops is available at <http://www.shorelinewa.gov/home/showdocument?id=17748>. The summary report lists common themes of comments received at those workshops, including concern over heights of new buildings and preferences for lower height limits, which residents felt would be more compatible with existing single-family homes.

Most of the housing stock within the 145th Street Station Subarea was built following World War II and includes many single-family rambler-style homes that are around 20 feet in height. However, before the City of Shoreline was an incorporated city and was an unincorporated part of King County, the height limit in single-family (R-6) zones has been 35 feet.

The 35 foot height limit in the new Mixed-Use Residential-35' (MUR-35') zoning proposed for parts of the subarea is intended to provide transition zoning between existing single-family and taller new buildings in other zones. MUR-45' has a height limit of 45 feet, which was a height supported by many attendees at the design workshops.

The zoning scenarios analyzed in the Draft and Final EISs were a product of many influences in addition to public comment, including existing policies in the City's Comprehensive Plan and those in County and regional guiding documents. Throughout King County and the Puget Sound region, policies call for development of nodes of higher density and mixed-uses near transit to accommodate projected population growth. Chapter 2 of this FEIS lists many of these policies.

Public comment throughout the DEIS process influenced several changes represented in the Compact Community Hybrid zoning scenario, including a maximum base height of 70 feet and retention of single-family zoning around parks and open spaces. Public comment also influenced the consideration of a phased approach to all action alternatives considered in this FEIS.

### **Why Plan/Zone Now When Light Rail Won't be Operational until 2023?**

Many of the DEIS comments dealt with the appropriate order and timing of rezoning in relation to improvements that would need to be made in order to support increased density. Some suggested that the City was metaphorically "putting the cart before the horse." Before discussing specific examples, it may be helpful to define the "horse" and the "cart" in this analogy. The "horse" is the zoning scenario, which defines potential impacts over both a 20 year and build-out timeframe. The "cart" is a variety of programs, improvements, and other controls that would be required to mitigate identified impacts.

One example given was that the City should not rezone before receiving commitments from King County Metro to serve the station and subarea. This seems reasonable, but in actuality Metro would first need to see that projected ridership would warrant increased service and that the City and its partners would be able to improve 145th Street so that their buses would be able to provide reliable service before making such commitments.

The same holds true with many of the other items in the "cart." Growth scenarios defined by zoning dictate a variety of needs, including improvements to transportation and utility infrastructure. The City will use population projections to identify programs, projects, and priorities through the Transportation; Surface Water; and Parks, Recreation, and Open Space Master Plans. In many cases, the City will use these projections to apply for grants to fund capital improvement projects. Utility and service providers will use population projections in modeling to update their own long-range plans.

It will take time to develop, implement, and fund all of the items in the "cart", and while it may seem that these details should be finalized prior to rezoning, it is actually the zoning that directs plans, programs, improvements, and funding for them.

## **Request to Delay Decision-making until the Sound Transit FEIS and the 145th Street Corridor Study Were Completed**

Perhaps one of the most common requests in comments on the DEIS was to slow down the decision-making process, and to wait until the Sound Transit FEIS and the 145th Street Corridor Study were complete so that the analysis from these documents could be incorporated.

On March 23, 2015, the Council responded to this public comment and the Planning Commission recommendation by delaying further subarea planning until completion of the 145th Street Corridor Study.

In July of 2015, the Federal Transit Administration issued a “Record of Decision” for the Lynnwood Link Extension, thereby completing the Sound Transit EIS process. In April 2016, the Council adopted a “Preferred Concept” for the 145th Street Corridor Study. In May 2016, Council provided direction to resume subarea planning through development of this FEIS.

## **Request to Phase Zoning and/or Create Another Alternative**

Another common request in DEIS comments was to phase zoning for the 145th Street Station Subarea Plan, as was done with the 185th Street Station Subarea Plan. There were also multiple requests to analyze another action alternative in addition to the Connecting Corridors and Compact Community zoning scenarios studied in the DEIS.

On May 2, 2016, the Council provided direction to include another action alternative- the Compact Community Hybrid recommended by the Planning Commission- in the FEIS analysis. Council also directed that a phased approach should be analyzed for all potential growth scenarios studied in the FEIS. Potential impacts and mitigations for the Compact Community Hybrid and phased approach to zoning are included throughout this FEIS and may be compared to those for the Compact Community and Connecting Corridor scenarios that were also analyzed in the DEIS.

## **Cars and Parking**

Many comments on the DEIS related to cars and parking. These comments discussed cars that would be traveling through the subarea on the way to the light rail station, including where these would park if there were not adequate room in the Sound Transit garage, and cars that would be owned by new residents.

Throughout the discussion of subarea planning, parking has been one of the most hotly debated issues. Many transportation advocates and other cities with high capacity transit systems say that to have a true transit-oriented community, minimal parking should be required at light rail stations or in new developments. Residents often expressed concern about impacts of inadequate parking on their neighborhoods.

The City has tried to take a balanced approach to parking. No new parking standards have been proposed through the subarea planning process; they are the same as the rest of the city. Eventually, new developments within a quarter-mile of a high capacity transit stop would qualify for a parking reduction, but the City is not granting this reduction until the light rail station exists. New development may qualify for a parking reduction based on provision of affordable housing, but will still be required to provide parking for residents. Parking requirements are a limiting factor on the size of a potential development, even when specific density maximums are not.

As for future projections and trends regarding car use, the EIS acknowledges that residents do and will continue to use their cars, but proposes supporting a variety of transit services and a walkable, bikeable community. A station and other local amenities do not diminish the need for individual car ownership for needs that can't be met locally or along a transit line, including commuting, recreating, and traveling. Throughout the subarea planning process the City has considered how to encourage an environment where households may be able to meet their needs by owning one car instead of two. This would represent a significant reduction in greenhouse gas emissions within the community over time.

Some comments specifically mentioned trends that will reduce car use over time, including car-sharing applications like Uber, driverless cars, telecommuting, online shopping, and many studies that show more members of younger generations are opting out of getting driver's licenses. However, the City acknowledges that cars and parking are issues that must be addressed for the foreseeable future and closely monitored as the light rail station and neighborhoods develop. Refer to Chapter 3.3 of this FEIS for specific analysis regarding transportation.

### **Affordable Housing**

Many comments spoke of the need for affordable housing within the subarea. FEIS Chapter 3.2 discusses housing, including regulations the City has adopted that require developers to build affordable units or pay into a housing trust fund to support development of local affordable housing options.

In May 2015, the Housing Development Consortium of Seattle-King County awarded the City of Shoreline the Municipal Champion Award for its leadership in supporting affordable housing opportunities in Shoreline and across the region. The award recognizes the City's efforts to create an equitable community through tools like incentive zoning and impact fee exemptions for affordable housing that were adopted through the 185<sup>th</sup> Street Station Subarea Plan. The City intends to continue to work with regional organizations and local non-profits to provide greater affordability over time.

## Growth Management and Sustainability

Several comments raised questions about why the coming of light rail should necessitate increased zoning density in their neighborhoods. While it is true that the City is not required to change zoning to accommodate the future station, the Council's position is that increasing housing choice beyond existing single-family styles will promote local and regional economic development, social equity, and environmental sustainability goals.

The Puget Sound region is expected to grow by over one million people in the next 20 years. For the past several years, Seattle has been among the fastest growing cities in the country. As a first-tier suburb, Shoreline will need to accept some of this regional growth. Smart growth principles suggest that it is preferable to focus growth in nodes surrounding transit, as compared to spreading it evenly throughout the city, and to allow for a mix of uses in these areas to promote walkable communities and neighborhood-serving businesses. Allowing for additional commercial, retail, and office uses, including conversion of existing single-family homes to these uses, provides more local employment opportunities and grows the tax base, which can provide for municipal programs and infrastructure improvements without relying on property taxes. These are some of the economic reasons to promote nodes of density near the future light rail station.

Studies also show that areas surrounding light rail stations are desirable places to live for a variety of different people. Basic economic principles dictate that if demand for housing in the area were to increase, but zoning (supply) remains the same, over time what would likely happen is the creation of larger and more expensive single-family housing that would maximize development capacity and limit the number of people able to live close to light rail. Shoreline has a small percentage of land that is available for multi-family development.

Providing for these uses in the roughly four percent of the city that comprises the 145th Street Station Subarea will allow more (and a greater diversity of) people to enjoy the parks, schools, and other amenities in Shoreline, as well as allowing them to access reliable transit. Because transportation costs are a significant percentage of household budgets, especially for low-income households, more housing options near transit could make more money available for other expenses. These are some of the social equity reasons to promote nodes of density near the future light rail station.

In recent decades, much of King County's growth has gone to more remote areas. This kind of sprawl is not optimal from an environmental perspective for several reasons. This growth tends to happen in areas that were not previously developed and often function as natural areas or agricultural lands. Residents of this growth tend to rely heavily on single-occupancy vehicles to commute and meet other household needs. Alternatively, when growth is concentrated near transit and services, less carbon pollution is emitted from vehicles and more land can be preserved for habitat and water quality functions. If new developments contain green building features, or ideally provide a net positive benefit with regard to water quality and energy use, then over time these suburban environments can promote resilience of natural ones. These are some of the environmental reasons to promote nodes of density near the future light rail station.

### Property Values and Taxes

Many comments raised concerns about a loss of property value within the subarea and an increase in property taxes. Analysis from more than 20 reputable studies of property values near high capacity transit suggests that they generally rise in value, from 0% to 32%, the closer the properties are to the stations (for all land use types—commercial, mixed use, employment, residential, etc.). Such value-added effects are usually attributed to rezoning as well as proximity to high capacity transit. For homeowners, the most typical effect is a 5% to 10% increase in value within ½ mile of the station, but exact potential increases in value are difficult to predict. An increase in property values would result in an increase in property taxes, but in Washington State there are property tax levy limitations that restrict the amount property taxes can be increased.

### Eminent Domain

Many comments cited concerns over the use of eminent domain. The City does not intend to use eminent domain with regard to the 145<sup>th</sup> Street Station Subarea. The City generally does not get involved in private real estate transactions. Subarea Plan policies may direct the City to dedicate funding and consider purchasing additional park property if it became available for sale. However, any redevelopment of the subarea based on zoning changes will be governed by private markets, demand, and willing sellers.

The City may need to purchase property to accommodate the expansion of 145<sup>th</sup> Street in the future. Additional design and environmental work still needs to be done, so the exact location or amount of property that the City may eventually need to acquire to improve 145th Street is not known at this time. If a home is located in an area that Sound Transit has identified as necessary for future siting of light rail facilities, including the track and stations, Sound Transit may need to purchase all or part of the property, through negotiation or potentially the use of eminent domain. Sound Transit will deal with these homeowners directly and the City is not involved in this process.

## ***Responses to Comments on the DEIS from Individuals and Groups***

**From: Barbara Angersbach**

**Received: January 18, 2015**

City of Shoreline Planning Department

I am a property owner in Shoreline. My property falls just outside the Mobility Study Area. I am requesting that the Planning Committee take another look at the boundary lines.

My property will be impacted by the Light Rail Transit Station as will all properties along 15<sup>th</sup> Avenue NE. However the non-residential development that has been occurring along 15<sup>th</sup> Ave NE is already impacting my property and its future as a residential site. In the 25 years that I have lived at the 15525 15th Ave NE, I have seen the elimination of housing due to the expansion of the church to the north of me and the building of an office building to the south. I am one of only four remaining homes on the block, three of which are rentals. The church has sold its property to the Shoreline Water District for a Maintenance Facility. As of April 2015, I will be adjacent to a major construction site. My mid-century house will be dwarfed by the development of institutional buildings and heavy equipment traffic.

A change in zoning to a multi resident status or a combination zoning with small business commercial use would make sense in terms of land use and commercial investment.

I propose extending the new zoning to include the area of 15<sup>th</sup> Avenue NE to include 15525 15<sup>th</sup> Avenue NE.

Thank you,  
Barbara Angersbach

**Response:**

The Planning Commission recommended extending the boundaries of the potential subarea rezone to include your home.

**From: Wayne Meek**

**Received: January 20, 2015**

I am commenting on the new Light Rail Development plans. I understand that my property at 15521 15<sup>th</sup> Ave NE is part of a proposed zoning change. I support this zoning change. I understand that there are two maps, one of which includes my block, the other does not. I would ask that my property be included in both plans.

I will give you a little history of my property. My daughter, single mother of three boys, bought the house at 15525 15<sup>th</sup> Ave NE in 1988. At the time her neighbor was growing marijuana in his garage. He was not an ideal neighbor for a young family. When his house came up for sale, I bought it in part to protect my grandsons from unscrupulous neighbors. The house was in terrible shape. I remodeled it to make it a rental. Despite the improvements, I never had good tenants. The location on a busy street and the poor condition of house, attracted problematic people.

In 2009 my daughter and I embarked on a massive remodel. We greatly improved the house in hopes of my moving in with my daughter. Instead I moved to an assisted living home. Even though we spent \$90,000 on rebuilding the house, its value on the real estate market remains far less than expected. Fifteenth Avenue NE is a very busy street. The expanding church nearby bought up many houses and turned them into parking lots. The future of Fircrest Home for the Disabled across the street is uncertain. As I approach my 92<sup>nd</sup> birthday I find myself more acutely aware of my limitations. I cannot live in a neighborhood that has so many dangers and changes.

The best thing I can think of is for my daughter and I to sell our properties to a developer because as residential homes, they do not have and never will have much value. I encourage you to change the zoning on this section of 15<sup>th</sup> Ave NE to allow multi-family buildings or small businesses.

Thank you for your consideration.

Wayne L. Meek

**Response:**

The Planning Commission recommended extending the boundaries of the potential subarea rezone to include your home.

**From: Patricia Panitz**

**Received: January 23, 2015**

Planning Commissioners,

Other than Option A (No action taken), all other options (B and C) are objectionable in that they allow for massive rezones from residential to commercial in half the city, with little thought given to impact upon existing communities and upon infrastructure.

The city itself has admitted that new schools, improved roads, and improvements in water and sewer will be needed to facilitate this project – this certainly won't come cheap. The old idea the "growth pays for itself" has long been refuted. The addition of 7, 8, and even 12 story buildings will result in congestion and crowding, particularly with regard to traffic, that even the incoming light rail won't be able to mitigate.

The 145 St. access and egress to Route 5 is mess now, particularly during rush hour. If 12 story buildings with more people and cars are added to the mix, the result will be a nightmare. Assuming that most people will use the light rail is fanciful and has no basis in fact. Most

people moving into these high rises will bring cars with them and use them, And where are all these cars going to be parked? Not on the streets I hope.

Proponents claim that the whole project will take 100 years to complete, which I very much doubt, but even if it were true, why the rush to approve it now? This whole project is being rushed through under most citizens' radar in order to get it done. The city is well aware that most citizens who know the details of this plan don't want it, and it is doing everything it can to accommodate the business interests who do. I suspect that most of the builders and developers who want this and will profit mightily from it don't even live in Shoreline.

While Options A and B will certainly benefit the business community, they will be of no benefit to the average person living in Shoreline now, and in the long run will negatively impact the quality of life of the average citizen because of increased taxes, traffic and congestion.

If this plan goes through, Shoreline will end up looking like Seattle. If I wanted to live in Seattle, I would have moved there.

Please support Action A (No action taken).

Please include my comments in the public record.

Yours truly,  
Patricia Panitz

**Response:**

General substantive issues raised are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Why plan/zone now", "Cars and parking", "Growth management and sustainability", and "Property values and taxes" sections and more specifically in Chapter 3, Section 3.3 of the FEIS.

**From: Julie Houff**

**Received: January 26, 2015**

For the public record.

Dear Shoreline City Council members,

I feel the need to add my input as someone who has lived, worked and enjoyed this community since I was a child.

Until we get big banks and major developers into public ownership so the resources can be democratically used to provide housing for all, the most commitment, creativity and courage by you is needed right now to ensure there is enough high-quality housing that is affordable for all people.

Best scenario for the future would likely be-

"Paying for any significant expansion of affordable housing will require a reversal of current regressive tax policies and major expansion of taxes on developers and the wealthy. This is why the fight for affordable housing cannot be waged without a struggle against income inequality and the ending the billions in corporate handouts. Publicly funded construction of housing has to be democratically overseen, by representatives of the communities, the labor unions, and the tenants. This will ensure the best use of resources and avoid waste and bureaucratic mismanagement."

Limit land that developers can access (that would fall under the slow and limited area phasing category I assume) so they are forced to compete for it, pay a premium, but without encouraging a "highest and best use" type of tax hiking system for those inhabiting the low density neighborhoods now or even for those who inhabit after current residents move. We don't want to increase the land value/taxes for land that is now in much lower density zoning. It's imperative to ensure that "highest and best use" only applies to the properties that are being purchased for major redevelopment and big profit. INVESTOR class should pay biggest premiums - and they will when developers pass the costs on to them via sale.

Limiting open space for the poor is very bad idea. Again, it's necessary to create ample more natural green space for health and happiness...just ask any wealthy person! Poor and poorer does not equal having less right to health and happiness than others!!! That would equal being extremely prejudicial.

Thank you very much for taking time to read my comments.

Julie Houff

Lake Forest Park- basically on the border of Shoreline and LFP

**Response:**

General substantive issues raised are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to phase zoning”, “Affordable housing”, and “Growth management and sustainability” sections and more specifically in Chapter 3, Section 3.2 of the FEIS.

**From: Dan Jacoby****Received: January 26, 2015**

Greetings.

I am following up on the public comment I made this evening at the City Council meeting.

At the meeting, I noted that the February 23rd City Council meeting is going to go late into the night, because the schedule calls for major decisions on two hot-button issues. In addition, I noted that the Planning Commission’s meeting to choose a recommended alternative for the 145th St. subarea is scheduled 12 days before the end of the public comment period on the DEIS. Neither of these is preferable.

This problem is apparently an unintended consequence of the Council’s original schedule for the two subarea rezonings. The solution, therefore, is to postpone a final decision on the 145th St. subarea. By moving the final decision back from June until July (or later), the rest of the schedule can be similarly shifted. It may be too late to reschedule the Planning Commission vote on February 5th, but it is certainly not too late to reschedule the Council’s preferred alternative vote.

There are several benefits to this move, including:

- Greater perception that the Council is interested in, and respects, public comment;
- Public input, and subsequent Council decisions, based on a total picture of the entire area, knowing what the northern subarea will look like;
- A much easier — or at least less difficult — February 23rd meeting; and
- Potentially, a wider view of the possibilities, particularly if the Council chooses to implement a phased approach to rezoning.

In contrast, there is no real down side to slowing down the process on the 145th St. subarea. As I mentioned in my comment, whatever Monday evening the Council makes its final zoning decision, nobody is going to start building the next Saturday, or a week from Saturday, or a month from Saturday, or a year from Saturday, because the light rail isn’t coming for another eight years.

I understand that there was a very good reason, one might even say laudable reason, for the current scheduling. I would put it to you that the original reason, given the unintended consequences we now face, is no longer sufficient, and a change should be made. I urge you to make the change.

Best regards,  
Dan Jacoby

**Response:**

General substantive issues are discussed in more detail in the “Request to delay decision-making” and “Request to phase zoning” sections at the beginning of this chapter. With regard to your request that the Planning Commission public hearing not conclude until after the close of the comment period, you may recall that the public hearing was carried over from February 5 to February 19, 2015.

**From: Susan Ragan-Stuart****Received: January 27, 2015**

In 1980 we bought what we thought was our "starter" house. A cute, clean, move-in-ready rambler in a quiet cul-de-sac—150th & 9th NE in Shoreline. After 2 children we looked for a larger house (wanting to stay in the Shoreline School District) but couldn't find one that offered what we already had—a quiet neighborhood where the kids could play freely, and the advantage of property that abutts the Paramount Park Green Space (thank you Janet Way). Over 34 years later, after two remodels, we're still here and we don't want to leave. I have attended some meetings - even the first one almost two years ago -on the light rail planning for our neighborhood. Not once have I heard a member of our community support the zoning/building plans you have presented to us. Not one! Please, please take into consideration the voice of the community. Go slower; phasing changes. The re-zoning DOES NOT have to happen all at once. Let the community adjust and grow in steps. Then you will get growth that is manageable.

Keep in mind that all of this is based on projections for growth--projections being the operative word. It is a guess, not a fact. All things considered, being overly generous in your projections {Option #3} can have disastrous effects. A simply downturn in the economy could interrupt everything. Everyone knows "if you build it, they will come". If you don't, they won't. Controlled growth (re-zoning in phases) seems the only logical solution. Slower growth is much more manageable for all concerned--schools, utilities, police & fire, etc., as well as the impact it will have on our taxes. “There is clearly a relationship between assessed values and changes in zoning” (See, William & Mary Law Review, Vol 17/Issue 4 *Upzoning, Public Policy, and Fairness. A Study and Proposal*. Richard W. Bartke, John S. Lamb). As well as the added taxes from various bond issues that will eventually appear due to increased population.

Your plans for what could be are ideal -- if you were starting with a clean slate, which you are not. Your pictures of what could be are beautiful - and I'm sure the Greenwood area had similar pictures (isn't it lovely now?). Woodenville also (cute but a growth nightmare trying to get in & out, or from point A to point B!). I am a horticulturist by profession (put in over 10 years at Sky Nursery) and my first reaction to the compact community plan (#3) was that I was going to lose the winter sun. Unacceptable. Option # 1, which you have decided is "no changes" should have been one that incorporates some of the enhancements, with considerations for re-zoning at a later date. Give it some thought. Please. With what you have presented to us, you are going to destroy my home, my community.

In closing, I'm hoping that you will respect the political process; listening to those you represent and act accordingly. I am not opposed to growth or the light rail system, but "it is much better to do a few things well than to do many things badly". *Id.*, William & Mary Law Review.

Susan Ragan-Stuart

**Response:**

General substantive issues are discussed in more detail in the common themes "Factors that influenced potential zoning scenarios", "Request to phase zoning", "Growth management and sustainability", and "Property values and taxes" sections at the beginning of this chapter.

**From: Cathy Aldrich**

**Received: January 27, 2015**

Shoreline City Council:

Regarding the DEIS rezone information session that I heard on January 22 some thoughts come to mind. First and foremost is that the projections of how fast redevelopment will occur are Pollyanna at best and misleading at worst. The Lynwood transit corridor around 164th Street and I-5 only took 15 years to totally change the character of the area, much of that construction taking place in the last five years.

This area had room to develop, it had rural land and roadway infrastructure in place LONG before the development took place. It displaced very few residents. The Shoreline rezone proposes to displace many.

One thing to note in the Lynnwood area as well is the fact that the most recent apartments have been available for at least six months and yet when driving past one can easily see that the vast majority have not been rented out yet. If there were such a high demand as to require the building of these *now*, why are they still sitting vacant?

The Ballard rezoning has changed the character of the neighborhood in less than seven years. The lack of parking has been a huge issue as well as it has underestimated how many are to their autos. The Roosevelt area has already been impacted in such a way to totally change the character of the neighborhood and light rail is not even close to being viable there.

If there is any question about cars and development one only needs to look to the apartments that now abut the freeway along 5th Avenue just south of 130th Street in Seattle. Those apartments are on a good bus line, they have limited parking available for the units, the street is now flush with parked cars where once there were only a handful.

To rezone an area so far in advance of when the actual station that is supposed to serve the expected new residents is then close to fully. The Shoreline station at 145th is not to open until 2023. Construction is to begin in 2018 and of course that does need an environmental review process prior, it will have a huge impact on the I-5 and 5th Avenue corridor. However rezoning the neighborhoods now and saying change will take twenty to forty years to happen is as stated, a Pollyanna view. History does not lie and there is enough recent history regarding how fast rezones change neighborhoods, no one should be ignoring these facts nor glossing them over.

There are many things that can change in the interim, including population projections. Just because things are booming now does not mean they will be come 2023. A more nuanced approach, a more phased approach would make more sense and set better with those who will be impacted by the City's decisions.

I believe the residents of the affected areas would best be served by *delaying* the process and NOT discussing both projects as if they are one.

It would make far more sense to have **"Phased Transitional Zoning"** that could be based on specifics such as having the infrastructure in place, *and this would include having the light rail station actually open*, and upgrades that can occur once the specifics are met. This is simple common sense based on so many unknowns. And there are MANY unknowns when one is trying to predict the future.

The only thing we know is that the light rail station is due to open in 2023, we do not know what sort of economic climate will exist at that time.

Regarding the actual community meeting and the presentation:

People do not like to be talked at, people do not like to be lumped, people do not like to be talked down to. The impression many received from the session was that all three points were in use. Many questions presented were not answered in a straightforward way, roundabout answers, non-answers, and obfuscation just serve to instill even more anger in those who are already angered.

To say “Millennials” like this or that ignored the fact that several of those who were expressing concern WERE Millennials. To assume that all of that generation will choose a certain path or pattern ignores human nature. To speak about current patterns ignores what happens when people marry and start families, many prefer to live in single family homes. Yes, things and attitudes are fluid and changing, but by focusing on one generation, while ignoring those of that generation who were present sends the message that the City does not see or consider its residents as individuals with individual opinions. And to ignore the concerns of an older generation who have lived here for many years and who helped make the City of Shoreline just that, a city, does not send a positive message either.

The concerned citizens understand that change happens. What they are questioning is why the City is pushing so hard, so quickly, to rezone an area in the face of so many true unknowns. ***Once the area is rezoned change cannot be stopped***, so why not slow things down and take time to see just how things progress? There is nothing wrong with taking a more nuanced, a more phased approach. Better to do this than make a misstep that leaves a blight on the area. Better to do this than step on the citizens whose lives will be affected by the policies the city enacts. This is why a phased transition would make far more sense.

If the process is slowed down it allows adjustments to be made. So what if in forty years there might be a building built in a phased in process torn down and rebuilt? This was an example that was used as to why phasing the process wouldn’t make sense ... yet it could happen anyway and is a more likely scenario given no one knows what will happen forty years from now, or even twenty. Why hurry into something when the end result is so far in the future, even if it is close at hand?

Once the character of a neighborhood has been changed by developers, we cannot get it back. And the developers are the ones who will be swooping in once a rezone is in place, that is the truth of history as is born out so many times, so many places.

Better to take it slowly and be more methodical and nuanced. That way the likelihood of stepping over the concerns of citizens can be mitigated and allow for adjusting, both of attitude AND policy.

I would request this letter, which is being sent to the Shoreline City Council and staff, also be recorded in the DEIS.

Respectfully,

Cathy Aldrich

Resident for 34 years

**Response:**

General issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, and “Cars and parking” sections. Specific information about parking can be found in the Chapter 3.3 and the concept of phased zoning is addressed through the FEIS.

**From: Janet Way****Received: Friday, January 30, 2015**

Dear Council and Planning Commission,

This article highlights important considerations as you look at policies for affordable housing in the proposed Rezone areas.

Please include this as a part of the record on the EIS' for both Rezone areas.

Regards,

Janet Way  
Shoreline Preservation Society

**Outside City Hall: Why the 10-year plan didn't end homelessness: will our new mayor make the same mistake?  
by Carolee Colter and John V. Fox Seattle Displacement Coalition (reprinted from this month issue of Pacific Publishing Newspapers)**

Almost a decade ago, we wrote a column criticizing the "ten year plan to end homelessness". Launched in 2005 with great fanfare, the plan committed to dramatically increase spending on low-income housing, overnight shelter and other homeless assistance programs. A “Committee to End Homelessness” was established to implement the plan, run primarily by elected city and county officials and big shots in the non-profit sector and corporate giving world.

While we appreciated the increased attention and dollars pledged to the growing problem, the plan lacked any commitment or set of policies to prevent the continued loss of our existing stock of low-income housing to the forces of redevelopment.

Even if the plan fulfilled its goal to add 9000 low cost units countywide over the period, for every one unit created, three to four units would be lost to demolition, condo conversion, and increased rents. Given that Committee membership included many with ties to developer interests, it was unlikely the plan ever would address the issue of displacement.

Ten years later, we have to add this story to our growing “we told you so” file. Since 2005, the ten-year plan takes credit for adding about 6000 housing units countywide. But in Seattle alone, over the same period, over 6500 low-income apartments have been demolished, another 3000 were lost to condominium conversion and at least another 6000 lost to speculative sale and rent increases. Thousands more were lost in the rest of the county to these forces.

Today homelessness has reached record levels--up 13 percent in 2013 and up another 20 percent last year. On any given night, there are 12000 homeless people, county-wide, including about 3000 sleeping in overnight shelters, 3000 in a longer term “transitional” housing, another 3700 counted on the streets in the annual shelter providers’ “one night count”, and at least another 3000 we estimate that go uncounted.

County and city leaders won’t acknowledge their plan has failed and to this day refuse to link the problem to the continuing loss of existing units to redevelopment and gentrification. Instead they’ve extended their plan out indefinitely, promising great strides in the future. Yet Seattle and King County together now spend over \$45 million annually on homeless programs. That's enough to hand each of those homeless identified in the “one night count” an annual \$15,000 check.

We are not saying stop committing these dollars for low-income housing and more shelter beds. But we're simply “shoveling sand against the tide” if displacement-induced housing losses are not addressed.

Mayor Murray seems to be making the same mistake. He pledged to come up with a bold new plan to for affordable housing in our city and created a housing advisory task force charged with recommending new strategies. Unfortunately, the task force is top-heavy with corporate, downtown, and developer interests and conspicuously short of neighborhood or tenant advocates or the homeless themselves.

The Mayor will have to look elsewhere for real solutions. For starters here are our ideas:

- Require developers who demolish low-income housing to replace one-for-one the units they remove and at comparable price. This should apply in every discretionary land use decision such as where a developer seeks an upzone, master plan permit, alley vacation, air rights or acquisition of public land. Impose a citywide moratorium on demolitions until this is adopted.

- Pass a "Right of First Notice" ordinance requiring all owners of existing lower-income apartment buildings to first offer them for sale to non-profits representing the affected tenants before they put the property up for sale to speculators and developers. Impose a moratorium on further upzones until this is adopted.
- Create a Housing Preservation Commission to inventory our remaining stock of privately owned low-income buildings at risk of being lost, and then recommend strategies for quick acquisition of these buildings. Consider selective use of the city's condemnation authority to acquire "at risk" buildings the Commission has prioritized.
- Inventory unused public lands in Seattle and the County and make them available for low-income housing development. Free land would save millions, stretching public dollars so more units can be built.
- Identify and create new dedicated sources of funding.

(1) Seattle and King County should issue \$600 million in long-term bonds for the development of housing for homeless people, (no more than both governments have done for sports stadiums, parking garages and office buildings.)

(2) Re-establish the Growth Related Housing Fund discontinued by former mayor Greg Nickels. Each year, 20% of the incremental increase in property tax revenue from new construction city-wide should be dedicated to the development of low-income housing. Adopt developer impact fees to replace these revenues that otherwise would have gone into the general fund.

(3) Dedicate 20% of the city's Real Estate Excise Tax revenue - about \$10 million a year - to the production of housing for homeless people.

The Mayor has said he'll listen to the community, not just his appointed task force. We hope so or he'll simply repeat the failures of the ten year plan and past administrations.

**Response:**

General substantive issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Affordable housing" and "Growth management and sustainability" sections and more specifically in Chapter 3.2 of the FEIS.

**From: Elaine Phelps**

**Sent: January 31, 2015**

Please incorporate this message into the record regarding the proposed rezones in the areas of 145th Street and 185th Street, Shoreline.

As a 50-year resident of Shoreline, I have seen many changes in our city, some of which I liked, some of which I did not. That's not at all surprising.

What is surprising to me - in fact, alarming - is what appears to be a fore-shortened and non-transparent process by the Council for these premature, radical and disruptive rezones in the areas of proposed future rail stations.

This approach does not put people first - it is in fact reminiscent of earlier times when our then city government tended to benefit special interests at the expense of the rest of us, more or less as much out of sight as it could.

I urge the Council not to proceed with the flawed process now in place and instead adopt a process that is truly democratic and in the public interest.

Indeed, what's the rush to end the process immediately when this is an undertaking that will take years? The only ones to benefit from preventing adequate public input, as far as I can see, are those who wish to develop these areas under the new zoning regulations to make substantial personal or corporate financial profit, without considering the environmental and social costs to those already living there.

I know that there have been notices to the public regarding opportunities to express their opinions on what they would like to see, but as you all know, relatively few people participate in such events. Significant interest and participation are awakened only when an explicit proposal is up for approval. These proposed rezones should have had widespread circulation throughout the city, followed by a well-advertised series of hearings. It is only now that we have been alerted to this proposal and its potential ravaging of the neighborhoods involved.

This concerns all of Shoreline, not just the areas immediately under the gun. All of our citizens need to have the chance to weigh in not only on the prospective rezones but on the process itself because, if for no other reason, who knows where the next assault upon our neighborhoods may come without significant time to learn the actual details and to respond as informed citizens?

Thank you for your consideration.

Elaine Phelps

**Response:**

General substantive issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Why plan/zone now" and "Request to delay decision-making sections.

**From: John Kropf**

**Received: February 1, 2015**

Dear planners,

Due to issues beyond my control, I can't make all the meetings I would like. I did make the Eastside Rail Corridor meeting in Seattle, January 28th. Alexa Vaughn must have been there too. [She gave a great report; including a picture of part of the Kirkland 5.75 mile "park" in the Saturday Times (1/31/15).]

The main presentation was by the King County Parks department, who did a marvelous job of projecting the future trail from Woodinville to Renton. What does Shoreline care about what the Eastside is doing? Answer: Kirkland has lead the way of the future by opening their section designed by individual communities. We, in Shoreline, can learn a lot from Kirkland.

Like Kirkland, Shoreline owns the greatest single portion of the old Interurban Trail, and it is working, but not with the enthusiasm of Kirkland, where congestion relief is one of their goals. We have a "golden" opportunity to connect our Interurban Trail to the Burk Gillman Trail and relieve the horrid congestion along 145th at the same time. We can become a portion of a physical network for transit that works like the internet at virtually no cost (I offered to buy the first vehicle).

-----Back to our immediate problem at 145th:-----

I studied the problem while my wife drove down 145th and beyond while I looked. [185th will become bad, but not as severe.]

Congestion is a nightmare. My wife and I often travel on 5th often to our doctor's office and shopping at Northgate. The area shown on your maps indicate horrid problems. We have experienced it first hand, many times.

Traveling north or south on 5th can be a nightmare now; waiting for many light cycles to get through even without a parking garage.

Same thing going east and west

Combine changing 90 degrees in any direction; increased congestion.

Capacity is a problem

The total system is past a breakdown point now. What will happen when a station and garage are added? Unbelievable!

Accident rate is already heavy for conditions, this too will escalate dramatically.

Adding a station without a garage will make things much worse.

Adding a parking garage, will make it impossible. Access is a problem. ing north on I-5 and then east on 145th is already a nightmare. The only solution for this access route is to add a non-stop right lane exit to enter east of the current exit point before merging.

Going north and then west is already a nightmare worth many light cycles.

Going south on I-5 and exiting to the west needs improvement, but is manageable

Going south and exiting to the east is another nightmare of light cycles and congestion.

Entering I-5 from any direction is often a multi-block wait.

Solutions:

Eliminate the Parking Garage.

This will be a good step, but any kind of taxi service to the station will help fight the current congestion.

A taxi type of service, if established, could be revenue neutral, pickup at your home and deliver within "5-10" miles (Lynnwood to UW?).

Investigate other 21st Century profitable solutions (like attached NASA).

Eliminate the station.

Let the Roosevelt UW station be the last of the 1890's technology (which was faster than our light rail).

We will still have congestion at UW.

Let the above successful taxi system use Northgate as a convenient interim drop-off for express bus service to UW and Seattle.

Install a 21st Century NASA supported system for the two mile corridor on 145th to the Burke Gilman Trail (BGT).

INTERURBAN to BGT: Using the latest NASA (below) technology, can be done at no cost, because it is profitable. A public-private partnership can achieve benefits for Shoreline as well as individual investors. The support poles are environmentally neutral (like light poles with no power). This NASA SkyTran system can then use BGT to Kenmore, UW (and beyond); INTERURBAN to Ballard, etc. Finally relief!

NASA 21st Century two station demonstration site will be complete in Tel Aviv this year (2015).

Requires no utilities (harvests own power), install up to a mile/day on extreme right-of-way (like utility pole).

Non-stop from your location to any location on the "Physical Network" at street speed limits or higher (up to 150mph)

Capacity up to 14,400 people/hour (three freeway lane equivalent) in each direction.

Low cost stations could be at your home or apartment building, (your/community choice).

Available 24/7 in zero seconds, no strangers.

Quiet (like a glider) MagLev SkyTran

In 1995, our Federal Government Transportation (DOT) produced a document (TCRP-15) that set up the rules for determining "how to move people out of their car" and into a transit system. The study was completed and published as TCRP-35, a 35 page document. I have reduced it to one page and hopefully more understandable. The URL for the complete document is on the attached "grading" rules (A,B,C,D,E,F) that influenced people like you and me. I have also attached the *MacIsaac* document (see slide 5) he was working on when he died (12/6/14) as well as a "slide" from the NASA AMES open house on 10/21/14.

John Kropf

**From: John Kropf**

**Received: February 16, 2015**

I have studied the material and had my wife drive down 145th and beyond while I took notes:

1. **Congestion is very heavy.** We travel on 5th often to our doctor's office at Northgate. The area shown on your maps indicate peak congestion problems. We have experienced it first hand many times.
  - o Traveling north or south on 5th you can wait for many light cycles to get through even without a parking garage.
  - o Same thing going east and west
  - o Changing 90 degrees in any direction increases congestion.
2. **Capacity:**
  - o The total system has high congestion now. What will happen when a station and garage are added?
  - o Accident rate is already heavy for conditions, this too will escalate.
  - o Adding a station without a garage will increase congestion.
  - o Adding a parking garage, will further increase congestion.
3. **Access:**
  - o Going north on I-5 and then east on 145th is congested. The solution for this access route is to add a separate non-stop freeway exit right lane to enter east of the current exit point before merging.
  - o Going north and then west is worth many light cycles. There is no easy fix.
  - o Going south on I-5 and exiting to the west needs improvement, but is manageable.
  - o Going South and exiting to the east is another nightmare of light cycles and congestion. No easy fix available.
  - o Entering I-5 from any direction is often a multi-block wait.

**Solutions:**

1. **Eliminate the Parking Garage:**
  - o This will be a good step, but any kind of taxi service to a station will increase the current congestion.
  - o A taxi type of service, if established, could be revenue neutral, pickup at your home and deliver within "5-10" miles (Lynnwood to UW?).
  - o Investigate other 21st Century profitable solutions.
2. **Eliminate the station:**
  - o Let the Roosevelt UW station be the last of the 1890's technology (which was faster). The Interurban ceased when no longer profitable in 1939. Why are we trying to use this technology?
  - o There will still be congestion at UW; 21st Century technology can fix the problem at virtually no cost.

- Let the above successful taxi system use Northgate as a convenient interim drop-off for express bus service to UW and Seattle.
  - Install a 21st NASA supported system for the ~ two mile corridor on 145th to the Burke Gilman Trail. [Or other de-congestion routes using 21st Century technology. 15th or 5th?]
3. **NASA CA LAB, APPT ONLY;** 21st Century two station demonstration site is being built in Tel Aviv this year ( 2015).
- Requires no utilities (harvests own power), install up to a mile/day on extreme right-of-way (like utility pole). [Environmentally neutral.]
  - Non-stop from your location to any location on the "Physical Network" at street speed limits or higher (up to 150mph)
  - Capacity up to 14,400 people/hour (three freeway lane equivalent) in each direction.
  - Low cost stations could be at your home or apartment building, (your/community choice).
  - Available 24/7 in zero seconds, no strangers.
  - Quiet (like a glider) MagLev SkyTran.
  - Local factories, state produced raw materials (aluminum).
  - Two shift teams can install a mile/day of guideway (off peak commute hours).
4. **TCRP-35:** This 35 page Government Transportation document tells us how to move people out of their car and into a transit system; Grades A & B:
- <http://www.tcrponline.org/PDFDocuments/TCRP%20RRD%2035.pdf>
  - SPEED/TIME; =(A), <14(B) Minutes (FASTEST is BEST) A NYCU Study showed that a 10% decrease in commute time = 10-20% increase in the economy!
  - WAIT/TIME; < 10(A), 14(B) Minutes (ZERO is BEST)
  - TRIPS/DAY; >15(A), 12(B) (Available 24/7)
  - HOURS/DAY; >19(A), 17(A) (Available 24/7)
  - LATE/MONTH; <1(A), 2(B) (Available 24/7)
  - The 6th relates to CROWDING! ( Basically, you want the seat next to you empty):
5. **NATURAL GROWTH:** Use SkyTran to relieve congestion and leave streets neighborly. No need to destroy existing buildings/homes in order to walk/bike safely. Let our city grow naturally, as the community continues in an orderly fashion (at a profit).
6. **SOUND TRANSIT:** Avg approximately 20mph, large expensive facilities, return mostly empty. Has built 20-24 miles since 1996. [No longer profitable in 1939.]
7. **ENVIROMENT:** Since SkyTran requires zero utilities, it is environmentally neutral. Our environmental laws are to protect us from degrading changes to our air, water and natural habitat. This makes SkyTran a win-win solution.

8. **James W. Maclsaac** P.E. made an 18 slide presentation pointing out major discrepancies in what the public is receiving from Sound Transit. The public needs to see this data. It s beyond the scope of this note. He passed away, but I can arrange a presentation with the Eastside Transportation Association (ETA).

Respectfully,  
John Kropf

#### **Response to February 1 and February 16 Comments:**

General substantive issues are discussed in more detail in the “Cars and parking” section at the beginning of this chapter and with more specificity in Chapter 3.3 of the FEIS. Many of the issues you mentioned with 145<sup>th</sup> Street were analyzed in the Corridor Study for that street, including improvements that could be made to mitigate existing and anticipated problems.

**From: Natanya Wilson**

**Received: February 1, 2015**

To whom it may concern:

We are writing to express our concern regarding the rezoning project in the Upper Pelican Park neighborhood. Our neighborhood is desirable because despite it's close proximity to Seattle, it's a quiet area with residents that are mostly families and long-time residents who have made this their home for several decades. As a family with young kids we value the simplicity, safety and family-feel that our neighborhood provides. We have three main concerns:

- (1) We want the zoning for our neighborhood to be specifically for single-family homes. The appeal of Shoreline is and has always been a family-friendly environment. Adding 4 to 8 story structures completely changes the environment around the home that we love.
- (2) Increased traffic due to rezoning. We specifically bought our home because it was not near a busy street. 8th avenue is currently quiet and safe for a walk to the park, however additional traffic raises the concern of pedestrian safety, increased street noise and additional traffic jams along 145th & 5th.
- (3) Re-phasing too hastily is another concern. Our little loop is a tight-knit community and our hope is that the entire project is drawn out into phases that give enough time to see successes and failures before re-phasing the entire community. Specifically, we would like our loop off 150th to be phased in slowly.

Thank you for your consideration,

The Edgecomb Family

**Response:**

General substantive issues that are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors that influenced potential zoning scenarios”, “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, and “Cars and parking” sections. Specific information about parking can be found in the Chapter 3.3 and the concept of phased zoning is addressed through the FEIS.

**From: Cynthia Matson**

**Received: February 1, 2015**

Alternative 2. I would like to know why the culdesac which is the 2300 block of N 156th Place is included in the possible rezone when it is obviously farther off the main thoroughfare than the other rezones. This doesn't make sense to me. It breaks up a good neighborhood, and for what reason?

I live in this culdesac and am not happy to see it included in the rezone.

Cynthia Matson

**From: Cynthia Matson**

**Received: February 2, 2016**

I am writing you about the radical rezone that you are planning in the 145th area near the link rail. I specifically would like to know why the culdesac in which I own a house was included in this rezone. This is the 2300 block of N 156th Pl, on the west side of the freeway. In this particular area, the rezone plan for some reason was made larger in our area, to include our culdesac, though the houses and remainder of the street just west of us was not put into the proposed rezone. I would like this culdesac to be removed from the proposed rezone. Come and take a look, it is a nice neighborhood, with nice neighbors and homes, and some of us have lived here over 40 years. If this is not possible, I would like to know why this culdesac had to be included in the rezone specifically.

Before the rezone even happens, our house value already went down \$20,000 from last year to this.

Thanks,

Cynthia Matson

**From: Cynthia Matson**

**Received: February 17, 2015**

I am writing to you in regards to the proposed radical rezoning in this subarea. I think this proposal is too much, too soon! Why are you proposing to uproot so many people for this? This is a nice middle class neighborhood, with a lot of single family homes. Many of us have lived here happily for over 40 years, and if forced to move, will not be able to find affordable homes in another part of the Shoreline area. I think this is outrageous! Where are the letters informing local homeowners that their homes will soon be in jeopardy? Where are the "proposed rezoning" signs to inform them? I don't think everyone knows about this. In the past, the city government has been very good about listening to the voters and homeowners in this city. It seems like this time, many people are not even being notified.

That being said, if we must have rezoning and the subsequent build up of properties, I would much prefer Alternative 3, the Compact Community model. Please keep the businesses and apartments on the east side of the freeway along with the light rail station. I see no reason to extend this to the west side of the freeway, other than possible greed on the part of developers.

Regarding the other proposal, Alternative 2, the Connecting Corridors, I would very much like to know why the culdesac that I live in, the 2300 block of N 156th Place, is included in this proposed rezone. There are three culdesacs in this area, right next to the freeway, built around the same time, and they all contain nice, roomy homes. The entrance to our culdesac is the extension of the 2100 block of N 156th Place, and I think it does not make sense to change our part to the higher density zoning, while leaving the rest of N 156th Place as a residential zone. Could the line be drawn straight across going east, instead of making a "jog" to include this culdesac? Has anyone physically checked out this area, to see how it is laid out? I do not see the reason for including this culdesac in the rezone, especially since a "jog" had to be made in order to do so. It would be disruptive to the rest of the residential area in this location. Look at the map! I would like someone to explain this to me.

Please remove this culdesac from the proposed rezoning.

Cynthia Matson

**Response to February 1, February 2, and February 17 comment submittals:**

Out of the four potential zoning scenarios analyzed in the FEIS, your cul-de-sac is only considered for rezoning in the Connecting Corridors alternative, but not in the other three. In this scenario, the potential zoning boundary was expanded north to include the entire cul-de-sac, rather than splitting zoning within it.

**From: Daryl and Laurel Stuart****Received: February 2, 2015**

We are asking you to slow down the process of choosing a 145th St subarea rezoning plan because we have lived here 52 years and we like it the way it is. Also, please move the final decision on the 185th to a later date, after Feb. 23, so we don't have to discuss 145th and 185th in the same meeting.

Sincerely, Daryl and Laurel Stuart

**Response:**

The City Council amended the adoption schedule. General issues are discussed in more detail in the "Request to delay decision-making" section at the beginning of this chapter.

**From: Roger and Shirley Parker****Received: February 2, 2016**

I would like to bring some of my concerns to your attention. It does not feel like the questions we ask are being fully addressed in the meetings and just the vision they have is being addressed.

I have lived in my neighborhood for almost 40 years. I bought my home in Shoreline for the schools, single family neighborhood and the quality of life from the vision of conservation for both plants and wildlife.

Upon retirement I will not be able to afford to pay rent or move to another location. My home is paid for and I have planned to live my life here. Please don't price us out of the neighborhood with burdensome property taxes.

If you put up apartments on 8<sup>th</sup> Avenue that are 7 stories high, I will not have any light for my home and gardens.

I think that traffic on 5<sup>th</sup> and 8<sup>th</sup> Avenue will not be addressed by putting in a turn lane and bicycle lane. It is already very congested on 145<sup>th</sup> and 5<sup>th</sup> during rush hour. I was told that you would not have to take land away from home owners to accomplish mitigation; I don't think that is true.

All multifamily and business dwellings must have assigned parking included in the rent. Other neighborhoods are proof that people will not be able to afford or be willing to pay for parking. The assumption that new people living close to a transit center will not need cars, is wishful thinking. If anything with transient apartments, you will have people sharing the apartments and needing additional cars.

Please don't take away all the character from our neighborhood. It is affordable housing.

There are sewage issues and water runoff that cannot be resolved without taking time.

**Suggestions:**

1. Don't put tall apartment buildings in this neighborhood. Keep the lower style apartments. Require parking in any multifamily building included in the rent with at least one car per apartment. Future generations may learn to live without cars but that is a long way off.
2. Don't try to do this while project with one plan. Complete one section at a time and do phasing. See how well it works and start the next phase. The plans say this will take up to 20 years for completion. See how well it works and start the next stage.

Thanks for addressing our concerns. I am not adverse to some changes, but remember you will have people buying up homes, putting in renters and not keeping the neighborhoods up. They will be waiting to tear the houses down. My quality and the quality of my neighbor's life will be at stake.

Sincerely,  
Roger and Shirley Parker

**Response:**

General issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Request to phase zoning", "Property values and taxes", "Affordable housing", and "Eminent domain" sections, and with more specificity in Chapter 3.3.

**From: Karen Beauchamp**

**Received: February 2, 2015**

Planning Commission:

I am writing you to strongly urge and recommend that we slow down on this entire rezoning project. The whole project is moving way to fast not only to ensure things are done well the first time but too fast for the council to truly have researched the affects of the entire project. I moved to Shoreline in 1997 with my young son because of its warm family friendly neighborhoods, schools, parks, easy going flow and wasn't stuffed with large complexes, with condensed overcrowded roads where children cannot be near and be safe. I have worked long and hard to I have a nice home and community to reside in too lose it for what some people just think is progress.

Much of what I have read about the project does not have good detail of the after affects of such zoning, I have family and friends who live in and near the rezoning in the Northgate and Lynnwood 164<sup>th</sup> area and are very unhappy. They had many of the same concerns and have watched their community change not it good ways, crime increase, overcrowded roads, property value issues... the list goes on. How we plan to accommodate and assimilate these changes in our community can both benefit and hurt us, so doing it right the first time is key. Your plans say thing will not happen for some time years, maybe even a decade .... Then slow down to address as many concerns as possible, make compromises, work together as a team with the community. Look at taking a much more phased project plan and study/do the homework and see what results to other communities have been with like projects.

Huge housing projects around our parks is not the answer, town homes maybe – we want Shoreline to stay a close community. Condo's on busy roads where it make sense (corner 145/5<sup>th</sup> NE – 185<sup>th</sup> NE next to the freeway) but still not massive units like 164<sup>th</sup> that are nothing but an eye sore. 3 – 4 stories like 181/182<sup>nd</sup> and 15<sup>th</sup> NE that at least blend and do not cause such crazy influxes to our roads and schools. Where are we going to have rent controlled housing for our seniors, low income for families in need??? Where are the children going to go to school? They are already overcrowded, school buses, increased taxes to cover those costs.... Don't say it won't happen because it already has.

I understand we need to grow and completely agree that we need to change in order to do that but this is not the way. Please, please I urge you to move much slower, take more time to study the effects, scale back so we can keep the integrity of our community intact and people will want to move here rather than move out!

Thank you for your time!

Karen Beauchamp  
Resident

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, and “Property values and taxes” sections.

**From: Karen Gilbertson****Received: February 2, 2015**

Please slow down on the 145th plan. It's too MUCH, too SOON!

As I heard from a council person at a late 2014 Monday meeting, "that we all know that Plan 1 is NOT an option", well THAT was a very inconsiderate comment. As more citizens become informed and have strong opinions, they are liking Plan 1!!! We live here NOW and want and like/love our single family homes! It seems that this aggressive pushy growth has very little consideration of those of us HERE and NOW!

The February 23rd meeting has both the 185th and the 145th in the agenda. IT'S TOO MUCH! One subject, NOT THESE TWO, is enough for that evening!

Please move the 185th decision to a later date.

Thank you,  
Karen Gilbertson

**Response:**

General substantive issues that are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, and “Growth management and sustainability” sections.

**From: Richard (Dick) Libby**

**Received: February 2, 2015**

As a Shoreline resident I am opposed to radical rezone in Shoreline and request that Shoreline planners and city council members consider the following:

- 1 – a radical rezone would cause high density and harm the liveability of Shoreline;
- 2 - pressure from Sound Transit (an unelected entity) is based on questionable assumptions about the popularity of light rail (small electric cars within 10 years could easily make light rail uneconomical and unfeasible);
- 3 - the Growth Management Act does not mandate growth levels, and was never intended to be a basis for a radical upzone;
- 4 - it is undemocratic for a small number of city officials/developers to enact radical rezone with minor citizen input; zoning changes have a dramatic impact on a community and should be decided by a public election;
- 5 – light rail could not handle the high volume of high density.

Since the issue of zoning is so critically important to Shoreline, I urge you to go slowly in considering this potential change. Do not let Sound Transit cause a rush to judgment. Many have chosen to live in Shoreline because we do not have high density and all the repercussions it would have for infrastructure (roads, schools, public services like fire dept., water demands, etc.).

Please distribute this e-mail to all members of the Planning Commission, and all City Council members. Thank you.

Sincerely,  
Dick Libby  
(MA, Public Administration, George Washington University)

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to delay decision-making”, “Cars and parking”, and “Growth management and sustainability” sections.

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**From: Steve Schneider**

**Received: February 2, 2015**

Slow down the 185th and 145th subarea plans. There are lots of mistakes in the DEIS. There is no reason to make a decision this month. We need 6-12 months more of discussions and feedback. There are many people affected that do not know what is going on with this rezone. The city need to send out more flyers regarding the rezones.

WHAT IS THE RUSH??? After all the light rail will not be here for 10-12 yrs.

Thanks, Steve

**Response:**

The City Council amended the adoption schedule.

**From: Ginny Scantlebury**

**Received: February 2, 2015**

Please slow down the process of choosing a 145th subarea rezoning plan because residents still have many questions about the future value of their properties and how this will dramatically change the entire character of their neighborhoods. Also, it will not work to discuss 145th and 185th Light Rail projects on the same night - Feb 23.

Ginny Scantlebury

**Response:**

The City Council amended the adoption schedule.

**From: Dave Lange**

**Received: February 2, 2015**

Please preserve the concept of setbacks on the sides and back of the lot, I would recommend 5 feet for each difference in zoning level, but it would be best if developers buy an extra lot and leaves it undeveloped (paved or grassed) when the affected lot is a single home.

Current drafts indicate the setbacks are still true when a new MUR is next to an existing R-4/R-6, but nothing is said between a new MUR and a single family house in a newly zoned MUR.

If it is important for cars and pedestrians walking past on the street it is at least as important for the owner of the property next to the development. Shoreline is also dependent on the setbacks to provide access to the back easement since there are locations where no alley exists. This comment should be added to the 145<sup>th</sup> Street DEIS.

**From: Dave Lange**

**Received: February 3, 2015**

We have a concern that previous multifamily buildings in Shoreline have caused parking problems in the surrounding neighborhood with no apparent recourse. We are now hearing that the city will start negotiating developer agreements that could include reduced parking in new structures. In the past parking problems were caused by new development where the city was only a permitting body. Thankfully the city is going to increase its apparent responsibility for street parking problems with these developer agreements. First, the City and Developers should be ready to provide, if necessary, parking permits for residents in those famous half mile radii. Residents in MUR 85 structures should get permits for inside the building parking only. Secondly post restricted parking times for non-permits and actively patrol. This will actually help the city track parking problems in the new subareas of our city. Thirdly Shoreline police should invest in a number of tire locks (for parking enforcement) and be ready to use them. We shouldn't be providing long term and game day parking in the neighborhoods around our station like some other Sound Transit stations. This comment should be added to the 145<sup>th</sup> Street DEIS.

**From: Dave Lange**

**Received: February 4, 2015**

This Green Network and sidewalk content is to be included in the comments for the Draft EIS for the 145<sup>th</sup> street subarea currently before the Planning Commission.

The maps of alternative 3 are showing part of the Green Network along 8<sup>th</sup> Ave NE and the same maps are showing this zoned MUR-85+. My understanding is MUR 85+excludes tree replacement rules and has no restrictions about cutting existing trees. Besides a little patch of dirt and a couple of young saplings MUR 85+ won't be a natural green. I would like to see the draft updated before it goes to Council with separate areas for MUR 85+ density and the remaining Green Network.

Early restrictions about not paving driveways to the street have not been enforced recently. The white lines on the sides of 8th Avenue NE are used as the local sidewalk, but have never been marked as such. The intent for this designation can be seen at the parking area on 8<sup>th</sup> Avenue NE on the west side of Paramount Park where the south-end of the sidewalk lines up with the white stripe. Parking should be permitted off-pavement, but because the sidewalk area is unmarked, an increasing number of cars are parking on-pavement. A New gas substation is in the path of a sidewalk on the south side of 148<sup>th</sup> NE Street and 2 businesses in the area along with other residences have created parking areas along the front of the home that are useless if sidewalks are created back from the street. Attempts to move the sidewalk off of the street will increase the number of cars using on-pavement parking.

Dave Lange, Owner and Resident

**From: Dave Lange**

**Received: February 4, 2015**

The current residents are a mix of renters and owners, short- and long-term residents, many enjoying the lower prices, a lack of association requirements and large spaces for gardens, pet runs, urban farming, wildlife areas and space for cars and businesses. Many have left Seattle neighborhoods to take advantage of the single lots in Shoreline. Sound Transit has been introducing their future of light rail, and a number of neighbors have planned to take advantage of this opportunity, coming to this area but without embracing an Optimized for Transit Area.

The Shoreline City website says the City is working with Sound Transit to evaluate the redevelopment potential of large parcels in the light rail station areas and previously in the Shoreline City Council Summary Minutes of the Business Meeting on Sept 15, 2014. Page 4 it says [The mayor summarized] also has a legal mandate to support transit and a responsibility to the community. I would like to comment on this in regards of the 145<sup>th</sup> Street Station sub plan.

While the Cover Letter of the Otak, Inc., 2015. 145th Street Station Subarea Planned Action Draft Environmental Impact Statement, January, Shoreline, WA. Prepared for the City of Shoreline, Washington, “implements Shoreline’s 2012 Comprehensive Plan goals and policies....” The following quotes show the City isn’t balancing its Land Use plans with its Housing plans from the current Comprehensive Plan (Adopted Dec 10, 2012). Housing Element 3, it quotes from the GMA “Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types and encourage preservation of existing housing stock”. Note this doesn’t favor the elimination of single family homes or adding multiunit towers.

Under Housing Goals (Page 39) the first goal is to “Provide sufficient development capacity to accommodate the 20 year growth forecast and promote other goals, such as creating demand for transit and local businesses through increased residential density along arterials; and improved infrastructure, like sidewalks and storm water treatment through redevelopment.” This indicates that density should increase as you approach an arterial and should scale back as you get further into a neighborhood.

Under Housing Goals (Page 40) the fifth goal is to: “Integrate new development with consideration to design and scale that complements existing neighborhoods, and provides effective transitions between different uses and intensities.” [This goal is also mentioned in the Planning Commission Agenda Aug 7 2014 p4].

Under Housing Policies (Page 40) the second policy is to “provide incentives to encourage residential development in commercial zones, especially those within proximity to transit, to support local businesses.” Instead of locating a station at 165<sup>th</sup> NE Street and 5<sup>th</sup> Ave NE or 145<sup>th</sup> NE Street and 15<sup>th</sup> Ave NE both with a mixture of businesses and multifamily units, the city is changing the zoning to multiuse for a number of existing residential neighborhoods which is backwards from its current policies. It has pushed for MUR-85+ on the large tracts around the 185<sup>th</sup> Street Station and is now proposing this zoning for aggregated individual lots around the 145<sup>th</sup> Street Station.

Under Housing Policies (page 40) the third policy is to “encourage infill development on vacant or underutilized sites.” The introduction on page 39, also mentions “create market demand for housing styles other than a single-family home on a large lot.” We should use market demand to buy single-family homes on larger lots for a better use or unused commercial property near Central Market and Sears, but we shouldn’t regulate and otherwise create negative investments for existing residential home owners in established neighborhoods. The planning commission is to be complimented for its decision on the 185<sup>th</sup> Street Station to recognize single family as a permitted use and removing the restriction of no more than 10% increase in building size as a good step.

If the quotes don’t apply to our neighborhoods around the future transit area and the TOA subareas are considered a community renewal, the owners should have been given a choice for a buyout. Either the phrases from the comprehensive plan are for all of the neighborhoods in Shoreline or you had the governmental mandate of eminent domain to change the role of these neighborhoods before creating these special subareas.

Many of the comments I have heard about this process are the expected randomness of the development. Changing the zoning on vast tracts of land and hoping for change will not benefit the current owners, neighbors, or the city. If you want to avoid a resident’s rebellion you should re-think the alternatives and find ways to preserve home values while avoiding blight. Given the private ownership in the subareas, it will be hard to create blocks of density that don’t look like grizzlies among the rabbits. Temporarily restricting potential excessive height and growth will create a blend of use and appearance while increasing density. Phasing growth on North/South streets

along with the Aurora Square and 145<sup>th</sup> NE Corridor initiatives will successfully bring forward sewer and water replacement projects that could block future growth on a more random basis.

None of this growth will occur if owners are trapped in their homes unable to leave because of underwater mortgages and developer offers that are priced only on land value and home removal. Future appraisals will impact sales and loans when real estate comps are drawn from these developer purchases.

Trying to balance the idea of blending with the neighborhood and pushing density toward arterials (which makes transit more effective) there is an intermediate step that will help keep the current schedule on track and is more likely to keep the peace. There is also the concept that walking to the station should not be just a privilege for multifamily residents. Around the station, any open ground level parking lots will be used by renters that should be there, but also by commuters (assuming Sound Transit doesn't provide enough parking); however, placing parking within buildings will tend to keep commuters out.

Create a MUR 65 area within the station block and across the street from it (on East and North sides), heading north finish the blocks facing the 5<sup>th</sup> Ave NE arterial with MUR 45 and use MUR 35 zoning for the blocks between 6<sup>th</sup> Ave NE, 8<sup>th</sup> Ave NE and 10<sup>th</sup> Ave NE and related side streets.

Unless trumped by the outcome of the 145<sup>th</sup> NE Street Corridor study declare MUR 65 on both sides of the freeway on 145<sup>th</sup> NE Street from 15<sup>th</sup> to Aurora and use MUR 45 along the 155<sup>th</sup> NE Street arterial from 15<sup>th</sup> Ave NE to 1<sup>st</sup> Ave N. For the west side of I-5 use a similar pattern with MUR 65 around any pedestrian bridge ends and MUR 45 for the blocks facing 1<sup>st</sup> Ave N and Meridian and MUR 35 for the infill areas. This avoids putting a 12 story landmark (MUR 85+) in the middle of a residential area in 10 years and then 5 years later regretting that it wasn't located somewhere else.

Add more MUR 85+ on the 15<sup>th</sup> Ave NE arterial which has a lot of multifamily already. Create a showcase for Shoreline's Green Network of streets away from the MUR 85+. Use the intersection of 15<sup>th</sup> Ave NE and 145<sup>th</sup> NE Street, North City and the Aurora Square project to grow more density along arterials.

Shoreline needs to link its commercial zones with its density zones so someone could actually live Transit Oriented. Jumping to create density with every new transit initiative is a losing battle. Set expectations to increase the density and heights in this area and extending up to 165<sup>th</sup> NE Street after jobs, transit and infrastructure have been created for the next phase of growth. This keeps MUR 85+ in existing multifamily areas (or large tracks of repurposed land in Aurora Square) near commercial for the immediate future. Dave Lange, again.

**Response to February 2, 3, and 4 comment submittals:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to phase zoning”, “Cars and parking”, “Affordable housing”, and “Growth management and sustainability”, “Property values and taxes”, and “Eminent Domain” sections. Specific information about traffic, parking, and housing can be found in the Chapters 3.2 and 3.3, and the concept of phased zoning is addressed through the FEIS.

**From: Cathy Floit and Steve Schneider****Received: February 3, 2015**

## COMMENTS/OBJECTIONS RE 145TH STATION REZONE

Thank you for giving us this opportunity to comment on the proposed 145th Station Rezone. Our objections echo and add to those of our neighbors.

A Few Words About Our Neighborhood

First, our home, this neighborhood, is our sanctuary. It provides a sense of well-being, of belonging to a community, of peace in a stressful world. The proposed alternatives threaten our sanctuary.

\* Our neighborhood is diverse, and I love this diversity! I can't claim ethnic diversity, but in our circle alone we have young families with and without kids, working couples, retired folks, singles, single working mothers, self employed persons and those on disability. I question the viability of this diversity under the proposed alternatives.

\* Our neighborhood is affordable! Our circle is probably 95% owner occupied, even with the diversity described above. My sister living in Lynnwood pays several hundred dollars per month more for a 2 bedroom apartment than Steve and I pay for our 4 bedroom house. I wonder what the owners of new apartment buildings or condos will charge their tenants? Undoubtedly more than our current mortgage and more than most current residents and others like us could afford. On the other hand, we support the idea of having low income housing, but we would not qualify for it.

\* We are gardeners and lovers of our outdoor spaces! Steve and I frequent the farmers' markets in summer but we also enjoy growing some of our own vegetables and fruit, and as many flowers as possible. We need sunlight for that, as well as for our mental health. On

beautiful sunny days our streets are full of neighbors walking or running, pushing strollers with babies, walking pets, riding bikes. The thought of walls of multi-story buildings blocking the sun and penning us in is utterly depressing.

In addition, we love our parks, the trees, and the amazing wildlife we can find in our city. Steve has photographed a myriad of birds visiting our backyard, including bald eagles, sharp shinned and cooper's hawks, barred owls, pileated woodpeckers, red-breasted sapsuckers, and many smaller birds, including hummingbirds. Don't take that away from us!

### Objections in General

I was astonished to read in the Feb. 3 edition of the Shoreline Area News that:  
City staff say they are hearing three themes from citizens regarding the rezone plans:

People, particularly younger citizens, are excited about light rail, and looking forward to greater density and the prospect of being able to bike and walk to coffee shops, and shopping.

Older people who bought starter homes 40 years ago are seeing a time when they will not be able to live in their homes because of mobility issues and health. They want to be able to get the most money out of their property to pay for their future expenses.

People who are excited about light rail but hate change.

We, and many neighbors, have expressed a different point of view that the staff has evidently failed to understand. Some of us are in favor of thoughtful and slow, limited and phased rezoning that does not destroy the character of the community we love. We think the area should remain predominantly single family detached. Steve and I are both over 60 years old, and we do not plan to ever move. Frankly we resent being lumped into the third category noted above.

It's critical to keep in mind what is being proposed: a "Planned Action Ordinance" and a 145th Street Station Subarea Plan. Once the Ordinance is adopted, future projects consistent with the planned action "would not be subject to further environmental review under SEPA, because of the extent of environmental analysis already provided in this EIS." Fact Sheet, p.2. A planned action therefore presupposes that the initial environmental review is thorough and sufficient. It is not.

In fact, the environmental review fails in fundamental ways.

The DEIS concludes in several sections that no significant unavoidable adverse impacts would be anticipated in part because incremental growth will allow the City to monitor and address the impacts over time. See p. 1-15 (Summary); p. 3-96 (population and housing); p. 3-146 (transportation); 3-165 (surface water); p. 3-188 (parks, open space, etc.); p. 3-193 (public schools); 3-200 (police); p. 3-203 (solid

waste); p. 3-206 (other public services and facilities); p. 3-239 (utilities). This type of analysis is inappropriate when the planned action process is intended to limit future review of environmental impacts because the initial review is thorough. What we have is a review of guessing and which punts the problems into the future.

Moreover, there is no way to determine that the growth will be slow or incremental. And, where is the guarantee that the City will have the will to respond to future adverse impacts, or that it will have the funds? Indeed, the DEIS acknowledges that "funding for improvements to serve growth is not secured." p. 1-15.

#### Specific Impacts

We support the criticisms voiced on many occasions about inadequate review and mitigation of traffic, parking, surface water runoff, and other issues. We would like to emphasize a few points in our comments.

#### Traffic and Parking

We welcome the light rail, but have no intention of giving up our car. We sometimes take the bus when we go downtown for concerts or games, but we need that car. We are hikers and must get to those trailheads in the Cascades and Olympics. Others in the neighborhood fish or enjoy boating. Some of us still go out to the movies. Even if there is a coffee shop in the area I doubt many people will shop by light rail since you have to carry whatever you purchase.

I'd like to know how many Shoreline officials plan to give up their cars because we have light rail?

The impacts of increased traffic are not adequately addressed. Obviously the light rail is designed to bring in commuters from surrounding neighborhoods, which will increase the congestion on our streets and impact the neighborhood's safety. How can our simple enjoyment of where we live continue with the massive increase in traffic?

With respect to rental unit parking, rather than merely requiring .75 parking spaces per unit, at least 1.0 space should be required per unit, and the space should be included in the rent. If not included, people will park in the street rather than pay the extra money charged for a space. I think the reality is that most households have more than one car.

#### Density and Height

The density and height proposals in both alternatives are too great for this neighborhood. The impacts on the quality of life of existing residents would be too severe.

Recommendations

We recommend the planning commission reject both alternatives as proposed.

The unknowns are too critical to proceed as the alternatives propose. As the DEIS notes, "funding for improvements to serve growth is not secured." p. 1-15. We believe it is vastly better to go slowly and adapt to changing economic times and changing populations rather than jump in with a massive project everyone might regret. Phased zoning can respond to the realities on the ground, rather than to "projections". In fact, one of the stated Objectives of the proposal is for a "phased program for change that is compatible with the community's vision for the subarea." p. 1-7.

The Planning Commission should develop another alternative with a smaller rezone area and with phased rezoning to be reexamined at intervals.

The process should be slowed down.

- \* We heard at the February 2 council meeting that the vote regarding a preferred alternative will not occur on February 5. Logically, the Planning Commission should delay that vote until after the close of the comment period.
- \* Sound Transit is evidently releasing its FEIS in April. Isn't that a critical document to include in Shoreline's review?

Conclusion

Thank you for giving serious consideration to our concerns and objections.

Please add our comments to the public record.

Cathy Floit and Steve Schneider

**From: Cathy Floit and Steve Schneider**

**Received: February 19, 2015**

Here are a few additional comments to supplement the letter we filed earlier; please add these comments to the record as well.

Although we support light rail, the zoning proposals are too large, both in scope and in building height. We are in favor of thoughtful and slow, limited and phased rezoning that does not destroy the character of the community we love. We think the area should remain predominantly single family detached.

We recommend a very limited initial rezone of the area immediately around the light rail station. A massive rezone could force out many middle class residents, and those who are nearing the end of their wage earning years. We could not afford the apartments and condos the City seems to want, and we would not qualify for low income housing. We want to preserve our quality of life in the homes we love.

Planning for the future is all well and good, but you don't have a crystal ball and that future is unlikely to resemble that contemplated in the proposed rezones. The economy, technology, and modes of transportation will all undoubtedly evolve and the City must be able to respond rather than be locked in for decades to plans made today.

Engaging in forward thinking for the community is a laudable effort. However, we live here now! We count, and you should not ignore us.

**Response to February 3 and 19 comment submittals:**

General substantive issues that are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to delay decision-making”, “Request to phase zoning”, “Cars and parking”, “Affordable housing”, and “Growth management and sustainability” sections. Specific information about parking can be found in the Chapter 3.3 and the concept of phased zoning is addressed through the FEIS.

**From: Kathy Giles**

**Received: February 4, 2015**

As a member of the 145th Station Citizens Committee, I would like to provide feedback to you about the light rail station plans that are being considered for 145th St. I would request that this feedback become part of the public record.

First, I would like to make clear that I am eager to see public transportation expansion and improvements in the Seattle metro area. I have lived in the Ridgecrest neighborhood for over 25 years and find that I prefer to use public transportation options over driving my car for trips into Seattle. Given that, I'm excited to see light rail coming to Shoreline.

However, I have concerns about some of the plans. These are my concerns about the plans that are being considered:

I would like to see both Alternative 2 and Alternative 3 limit heights to no more than MUR-45. In Alternative 3 – Compact Community, allowing 85' heights for several blocks with a jump to MUR-45 or MUR-35 does not seem to demonstrate an attempt to gracefully transition building heights in the neighborhood to sit next to blocks of single family residences within a short half-mile.

I would like to see zoning changes be phased rather than be implemented all at once. If indeed we should expect some of the anticipated housing changes to take 20 years or more to materialize, and given the complexity and unknowns about the 145th Corridor Master Plan and schedule for implementing those modifications, we perhaps can build in a more gradual process of change.

Thank you for your consideration.  
Kathy Giles, member, 145SCC

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors that influenced potential zoning scenarios” and “Request to phase zoning” sections.

**From: Heather Secrist, PhD, NCSP**

**Received: February 4, 2015**

Dear Members of the Planning Commission,

My name is Dr. Heather E. Murphy Secrist and I live at 16731 8<sup>th</sup> Ave NE. I moved to Shoreline in 2010 as my husband and I were purchasing our first home. A lot of time and thought went into where we would buy our house because we wanted to pick a place where we would want to stay, raise a family, and turn a house into a home. At the time, I was working for Shoreline School District and knew that it would be an excellent location for having children because of the outstanding schools. Shoreline was also an affordable place to live because at the time my husband was still in school, and again, I was working for the school district and being paid on the teacher’s salary scale. Knowing that Shoreline was where we wanted to live was just the beginning, because although Shoreline is not a large city by any means, there are many great neighborhoods to choose from. The Ridgecrest neighborhood stole our hearts with its friendly, family appeal, parks, movie theater, local coffee shop, and wide streets with plenty of parking. It had all the benefits of a small town, while still being right next door to the big city of Seattle.

I love Seattle, and I am very excited to have the Light Rail come and make it easy to get to Seattle for dinner, a concert, or some other event because as it stands right now, I hate driving into downtown because of the traffic and lack of parking. I am not at all against the Light Rail, and when I saw the flyers that were being sent out I read them and threw them away, thinking it sounded great, and why would I need to go to a meeting. The flyers said that this would affect where I lived, but the flyers never really expressed how things would change. I imagine that this is what happened with many of my neighbors. It was only when my husband decided to do a walking tour with a person from the planning commission that I began to understand what this all was about, and then started to attend the meetings just last Fall.

While attending the meetings, I was shocked to see the plans for rezoning our city. I couldn't believe that the plan was to take our lovely, small town feeling home and turn it into the next big city with giant high rises up to 7 stories tall. That is not why I chose to live here. I heard my fellow neighbors express similar feelings that we did not want this. Many people spoke about having options that were not as drastic as the zonings in Alternative 2 and Alternative 3. I heard many people say that they liked Alternative 1, with no changes. I heard a member of the planning commission respond to that by saying that Alternative 1 would not work because the Light Rail will bring change. To that I say, ok, change is coming, but why are we laying out the red carpet for it. Just because the Light Rail will be in Shoreline, why do we have to make such huge, drastic rezones to the city all at once?

At the DEIS meeting I attended in January, I was quite disappointed to see a slide from the planning commission that was titled "What We Heard" and yet not have any of the information on that slide reflect how the citizens are feeling or the outcry that they are expressing. We are not people who fear change simply because it is change. We are people who have chosen to live in a city and fear planned changes that will destroy what we love about the city that we call home.

I have heard from many people, and I agree, that this rezoning should be done in a slower, more phased way. What is the rush? I sincerely hope that the commission this time will hear that we want slower phasing of these zones in order to ensure the best possible result in the end.

I have also heard from others, and I agree, that we need to be thinking about roads, traffic, and parking. Driving along 5<sup>th</sup> Ave at 5pm is already a headache, I shudder to think at what will happen when we bring in the proposed amounts of people who are going to fill these tall buildings. And what about parking? It is naïve to think that people will give up their cars just because they live next to the Light Rail. Our city and surrounding cities are not designed in such a way that once you step off the Light Rail you have adequate public transportation to easily get you to all the rest of the places that you need to go. People will still have their cars, and those cars will be on the road, and then will need a place to park.

I know a concern that was recently addressed at a city council meeting was the need for affordable housing in Shoreline. As I previously mentioned, I was able to buy my home in the Ridgecrest neighborhood on a salary that is within the range of income that the council is trying to address. This plan is not addressing those who are at or below the poverty line, and for the income level that is of concern; it is possible to find affordable housing currently in Shoreline.

I request that the planning commission please consider the concerns of the people who live here, people who are not acting out of an utter fear of change in general, but people who see huge, drastic, and rushed changes to the residential zones of the homes that they love. I love my home and I love this city, let's find a way to have the addition of the Light Rail be a positive addition, not a destructive force.

Please include this letter as part of the public record.

Heather Elise Murphy Secrist, PhD, NCSP

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors that influenced potential zoning scenarios”, “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, “Cars and parking”, and “Affordable housing” sections. Specific information about transportation can be found in the Chapter 3.3, housing in 3.2, and the concept of phased zoning is addressed through the FEIS.

**From: Larisa Sparling**

**Received: February 4, 2015**

To Whom It May Concern:

I would like to offer feedback about the proposed rezone around the 145th Street Light Rail Station. I would like my comments to be part of the public record. My address is 843 NE 151st Street.

I am deeply concerned about the pace and scope of the proposed rezone. I agree that some density is called for in light of the Light Rail Station, however, it seems that the plans are being proposed for maximum density in 80 or 100 years, but there is little consideration for the people who live here now and for the next 10 or 20 years, and how such a massive rezone now, all at once, will affect our lives as members of the community now. Due to the scope of both this rezone and the one surrounding 185th Street, the impact of infrastructure

construction, large residential and commercial construction projects, and the phenomenal increase in density will severely negatively impact the quality of life for those who currently live in the neighborhood, especially due to the fact that there is no predictability.

I also am very concerned with the pace that this process is moving at. While I've attended several meetings and been involved, it is alarming to me how many people are unaware of this process, and the scope of this process. I also don't feel like the limited opportunities for public comment (15 minutes at some meetings), has been adequate to really understand how the community is feeling about this rezone. I think that most people agree with some rezone, but the pace of this process is such that it feels like I am being forced to quickly accept something that may be improved if there was adequate time to review and discuss as a community.

In general I agree with urban density and welcome the opportunity for a renewed investment in our community, however, I don't feel secure that the current process will protect the neighborhood from out-sized projects, or those that will simply not fit into the fabric of our community. I'm also deeply concerned about the impact on the environment and the surrounding communities (traffic, parking, storm water systems, sewers, water, electricity, etc.) of two massive areas of increased density that do not appear to have been studied together, despite the fact that they will clearly impact each other and the surrounding areas of the city.

History seems to indicate that though light Rail is planned for our area, there are many factors that could delay or stop it's construction (funding, political, etc.). I worry that a massive rezone is premature when construction has not even begun yet. Perhaps the rezone should be delayed until a more firm understanding of the timeline for light rail is known.

I've attended several meetings of concerned groups, and a phased approach to the rezone has been discussed. This seems like a good option that should be considered, as it will provide a much needed limit to the construction areas, isolating them to one area at a time. Also, such an approach would provide some predictability for current home owners, giving them a better chance to plan, and some protection against the blight that some are projecting will occur in our neighborhoods as developers collect lots.

Thank you for your consideration of my comments.

Sincerely,

Larisa Sparling

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, and “Cars and parking” sections. Specific information about traffic, parking, stormwater systems, sewers, water, and electricity can be found in the Chapters 3.3 and 3.7, and the concept of phased zoning is addressed through the FEIS.

**From: Claudia Butler****Received: February 4, 2015**

Planning Commission Members:

I have been living in the 145th station subarea for the last 28 years and initially moved to Shoreline to enjoy the friendly neighborhood atmosphere, open spaces, what has been affordable housing for me, the character of single family housing and ability to get to know my neighbors. There also has been the benefit of convenient bus routes into downtown which I enjoy as I am able to walk to a bus stop and catch an express bus that takes me directly to work with no transfers downtown. When the City of Shoreline became incorporated I was pleased as I knew I would not find myself living in a much bigger and more congested city like Seattle. We have yards to be outdoors gardening, enjoy the peace and quiet away from congested streets and there is space for children to play safely. I had hoped to remain in my home after I retired as again, it would continue to provide affordable housing for my needs and a good quality of life.

However.

Things do change and growth happens. I realize that. The implementation of a light rail system is another important aspect of adding to our transportation system as a means to help control congestion on highways and streets which I support. I also understand it will help move more people into town to work or attend school rather than using cars on the already overloaded freeway. But I do not understand why the addition of a light rail train near I-5 and 145th translates into massive over development of our neighborhoods. And with the proposal of instant rezoning of not one but two large areas of our city. The DEIS really does not hold many answers to certain concerns I have about the proposed redesign added density and overblown building heights. It speaks to anticipated volume of growth in the next 50-90 years but that is a very long time away and many unpredictable events can happen along the way to alter that vision. It really does not speak as much about the first 10-30 years and how to afford the development of our utility systems, streets, storm drain systems, sidewalks, the addition of fire and police personnel, etc. In the first section of the DEIS it states that there is no secured funding for any on the improvements to accommodate growth.

As much as the hope is to have large numbers of residents close to the train station using the trains as a primary transportation source, I do not believe that is the whole picture. Cars will be in our future for many years to come. I take the bus 5 days a week but, weekends I need my car to run errands. During the week, I need a car to get to appointments in locations a train will not go near and I do not have the time in my working day necessary to deal with transfers to and from buses and still work. On weekends, I am out hiking or doing other outdoor activities a train will not allow me to do. Cannot get out to the mountains to snowshoe in the winter for example. People will need places to park these cars. Then there are the other commuters from areas in Shoreline that are further away and people will need to drive to the station to access it. If they drive and there is not adequate parking around the station all those cars will be in the neighborhoods. And if developers are not putting in adequate parking for the rentals they will build, there will be even more cars on neighborhood streets. There are proposals in the DEIS for additional transportation options to get people to the station but it is not clear to me how they will be paid for. Where for example will money be found from grants to develop alternate transportation options? Is that Federal and/or State? It's difficult to obtain money now for routine street repair let alone alternate transportation options.

Personally, I do not know what is attractive about any of the proposed building designs. All I see are large (3 -8 story) box like buildings being built in row upon row that will surround our open parks and cut the sunlight getting through to the area itself. The streets and parks will be more enclosed and claustrophobic feeling with again less light shining through. As many of these are expected to be rental units, this translates into people living in more confined spaces going to and from work without the opportunity to gather in a neighbor's yard and visit which is now an option in our single family residential neighborhoods. We have the opportunity to get to know each other which leads to more comfort and feeling of safety in my home environment. With the proposed buildings and more transient population of renters coming and going that sense of neighborhood and security becomes lost. What about the option of slowly phasing in the design proposals for adding new buildings?

What about rethinking what the community members who live here actually recommended when we were asked at the initial design meetings to suggest what we felt would fit in our area? At that time every group that met suggested no buildings higher than 5 stories closest to the train station then phase down to 3 story buildings in the neighborhoods. The plans that were presented by planners came back and looked nothing like what the residents wanted. They are all overgrown with 6-8 story buildings surrounding 3-5 story buildings in the center of the neighborhoods. With no opportunity to maintain zoning for single family homes. Phasing in the rezoning as we see what actually happens with population growth rather than automatically assuming projected numbers will appear. I understand what is being told to us about the fact the "do nothing alternative" does not meet federal, state, regional, etc growth needs but I still do not believe the massive density being proposed in the other two alternatives is necessary. There must be another way to compromise on the design that would accommodate a more moderate increase in density but maintain more of the neighborhood character and diversity with its more open, safer and comfortable feeling. It would also give homeowners an opportunity to see what would happen and make more informed decisions about what they feel they need to do in the future.

What is the big rush to push all these decisions through on such a fast time line? Why does the Council feel the need to settle on a final design alternative by June 2015? We will not have a train for another 9-10 years and the DEIS does not really indicate how we will be paying for all the infrastructure changes needed to support the massive development that is proposed. It is not clear what the economy will be like over time and if the economy falters again there may not be grant monies mentioned in the DEIS for example as one source of funding to help pay for infrastructure changes. It seem phasing changes in over time could be a more realistic way to adjust to any unexpected economic swings. This rather than starting off with the bigger more massive changes over shorter time periods. Or on the other hand, if we start developing and the anticipated population development does not materialize, how to we pay to deal with potentially large underutilized buildings that could become nothing more than eyesores? It seems there could be a slower more thoughtful process. It would also be helpful for the community to have additional time to respond to the DEIS study and engage in dialogue with the City Council and Planning Commission. One month is very short given the large amount of information and terminology that one is not familiar with. It would be nice to have additional time to understand what I am expected to respond to and what it all means for our future. Is it possible to allow an additional month for community response? Could the response date be by March 17th instead of February 17th? The City Council and Planning Commission members have had many months to become familiar to the terminology and concepts detailed in the report. What is the difficulty with not deciding on the final alternative design plan until this time next year for example?

Please add these comments to the public record.

Thank you for consideration of these questions/comments.

Claudia Butler

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors the influenced potential zoning scenarios”, “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, “Cars and parking”, “Affordable housing”, and “Growth management and sustainability” sections. The potential to phase zoning is specifically analyzed throughout the FEIS.

**From: Lauren McLane**

**Received: February 4, 2015**

Dear Sir or Madam:

I would like to offer feedback about the proposed rezone around the 145th Street Light Rail Station. Please make my comments part of the public record. My address is 843 NE 151st Street.

Primarily, I am concerned about the pace and scope of the proposed rezone. I agree that some density is called for in light of the Light Rail Station; however, I believe that little to no consideration is being given to those who will be living through the rezone and who are on the "10-20 year plan" as opposed to those who will be living in our evolved community on the "80-100 year plan." This proposed rezone will deeply affect our lives as members of the community now. The scope of both this rezone and the one surrounding 185th Street will surely impact the quality of life for those who currently live in the neighborhood, especially due to the fact that there is absolutely no predictability.

Additionally, and perhaps even more significant, I am also extremely concerned about the pace for this process. I am a busy attorney and have not yet had the opportunity to make the community meetings; however, my street has bound together and attended these meetings, and then reported back to one another. My partner regularly appears at the meetings on our household's behalf. From these informed reports that I am receiving, it is alarming how many people are unaware of this process and the scope of this process.

In general, both my partner and I agree with urban density. Nevertheless, I second her comments that she has shared with you in a separate email that, "I don't feel secure that the current process will protect the neighborhood from out-sized projects, or those that will simply not fit into the fabric of our community. I'm also deeply concerned about the impact on the environment and the surrounding communities (traffic, parking, storm water systems, sewers, water, electricity, etc.) of two massive areas of increased density that do not appear to have been studied together, despite the fact that they will clearly impact each other and the surrounding areas of the city."

Concerned citizens in the affected areas have held community outreach meetings on this topic and have discussed alternative approaches. Specifically, a phased approach to the rezone has been discussed. This seems like a more appropriate option that should be given careful thought and consideration.

Thank you for your time, Lauren McLane

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, and “Request to phase zoning” sections.

**From: Sarah Jaynes**

**Received: February 4, 2015**

I am concerned that the station areas rezoning are not taking a holistic view. It appears planning is being done in Shoreline in a piecemeal approach. A 1000 units to be added in Aurora Village, 3000 with Point Wells and thousands more around 185<sup>th</sup> and 145<sup>th</sup>. The impacts are not being looked at as a conglomerate but as individual cases. What happens when all these projects get a green light and development starts? Shoreline is not that big. What is going to happen with schools, utilities, infrastructure, etc when growth gets out of control and they can't keep up? I grew up in Issaquah so I have some idea. The classrooms will get overcrowded and many classes will be moved to overflow trailers. The traffic will get horrendous and it could take you an hour to get a couple miles sometimes. Growth wasn't controlled and the citizens and the city suffered. I saw recently that Ballard's urban village residential growth already exceeds the 2024 growth target by 317% including issued permits. With the units already built the growth target has been exceeded by 206%. What if the numbers you are using to plan are as off as they are for the planners in Ballard? Ballard isn't the exception either. Many Seattle neighborhood growth projections are off. What if your 125 year plan is actually a 30 year plan? How is Shoreline going to maintain a similar quality of life and services to its citizens?

With regards to the 145<sup>th</sup> station do you have any idea what Seattle is planning? What if they plan for similar extreme rezoning? Any projections or studies you are basing your decisions on would already be obsolete before they've even been done. I know you've heard it hundreds of times but these rezoning plans are moving too fast. Hope for the best but plan for the worst and that takes time. Shoreline needs to be working in partnership with Seattle and other areas. Shoreline is just one piece of a larger puzzle and we need to figure out how we fit in it.

Additionally, I know you really want Shoreline to be just like Seattle but no matter how dense you make Shoreline we will never be as big as Seattle. I understand annexing 145<sup>th</sup> would make decision making easier but let's face it Seattle has deeper pockets and needs to pay their fair share for road improvements.

Finally, I believe the zoning changes proposed for 145<sup>th</sup> Street and 185<sup>th</sup> Street station areas are too extreme. A more moderate approach should be taken based on community needs and feedback.

Thank you,  
Sarah Jaynes

**Response:**

This FEIS studies potential impacts and mitigations of multiple zoning scenarios and phased approaches of all growth scenarios with regard to schools, utilities, infrastructure, etc. As to your question about Seattle's plans for area south of 145<sup>th</sup> Street, this is comprised of large, stable land uses, including Jackson Park and Lakeside School, so there is no indication that these uses are proposed to change in the foreseeable future.

**From: Robin Lombard****Received: February 4, 2015**

Members of the Planning Commission,

My name is Robin Lombard and live at 2316 N.147<sup>th</sup> Street (slightly more than ¼ mile from the proposed 145<sup>th</sup> street station). I love my neighborhood and my neighbors. I do not want to move. I welcome light rail and I understand the need to provide affordable housing and to create a walkable neighborhood around the station. I believe we can do that with careful planning – but gradually, over many decades.

My main feedback on the DEIS and station area plan is that it has a lot of detail about what things will be like in 60-100 years. However, I think what we're missing are the milestones in between now and then, especially the near term milestones. We have an end vision, but not a series of steps to get there. I believe we need a solid plan in each area to be ready for light rail in eight to nine years.

For example, what steps do we need to take now so that we are ready for the increase in traffic that we will see as soon as the station opens in 2023? When the station opens we will have a huge increase in traffic – no matter what the zoning is. I realize that 145<sup>th</sup> redevelopment is being handled by a different study, but we will suffer if we don't think through how to deal with very heavy traffic on 5<sup>th</sup> Avenue, 155<sup>th</sup>, and 145<sup>th</sup> plus a number of other secondary streets.

Up to this point much of the discussion has focused on the re-zoning of land. I still don't understand why that has to happen this June – as the DEIS states, we don't expect a full build-out for 60-100 years. Instead, why not focus on what steps can we take over the next 10-20 years to ensure a smooth transition of the area around the station from single-family homes to a mix of transit-oriented development? Can

we phase in zoning? That would provide more certainty for homeowners, and allows for a gradual transition. I would love to see a plan that ties phased development to a series of milestones that includes road and utility improvements.

Finally, thanks for your service to our community. Until I started coming to the planning commission meetings I had no idea how much work and responsibility you have. You have the future of our station area in your hands. I trust you to balance all the facts and opinions and make decisions that are in the best interest of the city and its citizens.

Please include this letter as part of the public record.

Respectfully,  
Robin Lombard

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, and “Request to phase zoning” sections. Regarding your feedback about near-term (10-20 years) versus build-out timeframes, the FEIS analyzes potential impacts and identifies mitigations for both.

**From: Fran Chambers**

**Sent: February 5, 2015**

My name is Fran Chambers, I live at 160th and 10th NE. I would like to go on record echoing the attached letter from Robin Lombard. I would like to add that if in the 1950's when I-5 was in the planning phases, the rail system had been included, none of this would be necessary. The point being...do not get ahead of yourselves by leaving out the major impact steps which could avoid the gridlock which WILL occur.

Thank you, Fran

**Response:**

A response to this letter is included later in this chapter.

**From: Jeff Eisenbrey**

**Received: February 5, 2015**

“The change in property value due to zoning is known as option value. This externality may or may not be positive. To account for changes in option value, good government must know specifically how and by what magnitude land use zoning affects the option value of property.” Quoted from, “Effects of Zoning on Residential Option Value” Jonathan C. Young, Department of Economics, West Virginia University Business and Economics

To preface the remarks and questions that follow I wish you to know that, unlike developers, I already work sixty to seventy hours per week at a low wage. I have no staff. I have no lawyer, and I have no time. My neighbors, for the most part, are unable to make the commitment to stand up for themselves. Many of them have little more than their homes, whose appreciation in value is now very much at risk.

I am philosophically in favor of density, transit, low-income housing, and restoration of natural systems for storm water management, all of which are promised by the massive redevelopment proposed by the Shoreline City Council. But there are severe deleterious externalities inherent in growth that occurs: 1) with rapid upzoning, 2) when regulated by market forces. One need only read the New York Times and travel throughout the city of Seattle to see what occurs.

As an historian, I am a capable researcher, but I don't have the luxury of hours to spend in the University of Washington library to become fully informed about the impacts of upzoning in single family residential neighborhoods. In my online research I find no precedent for drastic upzoning of large areas of single family housing except in the case of airport construction. The documents I *do* find leave me with the concerns, questions, and suggestions detailed below.

My greatest concern is for externalities associated with rapid growth. These include loss of property values, increased tax assessments, and erosion of quality of life. With thoughtful planning these effects can and should be both minimized and mitigated. Leaving the character of development to “market forces” treats residents of modest means and the homes into which they have invested their lives as no-account victims of a “natural” process of growth. As a city and a society we have to do better than social Darwinism. History may show us the way. **Aggregation Induced Blight** is the result of incomplete planning. It results when zoning encourages developers seek to acquire property at the lowest cost possible and then aggregate holdings over time. They take advantage of tax write-offs for years of losses on properties while seeking over a decade or more to join parcels and build large-scale projects. Property whose fate is to be demolished is neglected, depressing values for residents whose choices become limited and costly. Furthermore, out-scale multistory developments diminish livability in numerous ways that are easy to imagine.

Some steps that will minimize and mitigate adverse impacts are as follows:

- Limit the scale projects to one or two parcels. This discourages out-of-community developers whose immense resources allow longer time-scales to realize greater profits. Benefits accrue in the nature of businesses (locally owned/small business), the diversity and character of architecture, the responsiveness to changes in the neighborhood.
- Limit the time-frame for permit to completion of projects in order to discourage aggregation.
- Assess mitigation fees to secure the value of homes negatively impacted by development. Residents should be assisted in relocation to comparable homes.
- Municipal bonds could be sold, and county/state/federal funds may be available to establish a mitigation fund.
- Where large scale projects clearly serve the public interest, eminent domain may be the most just method of acquiring properties, but private profits must be strictly limited in these cases.

While common in Western Europe, there is little precedent in North America for protections from the negative impacts of planned growth. One noteworthy case is New Jersey, which instituted a Department of the Public Advocate, reconstituted in 2006. The department's top three priorities for reform at that time were as follows:

- limiting eminent domain for private redevelopment to truly blighted areas, as the State Constitution requires;
- making the redevelopment process fair and transparent so people receive clear notice and have a meaningful chance to defend their rights in court; and
- providing adequate compensation and relocation assistance so families that lose their homes can rent or buy safe, sound, and comparable replacement housing in their own communities. (2009 Rutgers Law Record)

In a case brought by developers, a 2007 landmark Supreme Court decision there reined in overzealous redevelopment plans. Research in this and similar cases argues against provoking residents' oppositions and legal challenges. Shoreline could become a model of humane upzoning development, but this will require imagination, patience, and political will.

A study entitled: "Cost-Benefit Analysis: Ethics and Problem Boundaries," examined the effects of conflict upon transit-related redevelopment planning in the Bay Area of California. I quote the abstract in full:

*Conflicts enlarge the scope of the considerations that need to be addressed by program and project evaluations. The enlargement of a problem's boundaries may include shifts in the ethical premises used to assign values to the plan's indirect consequences. This review of the conflict generated by a Bay Area Rapid Transit System station's potential land-use impact shows how the relevant issues expand beyond the boundaries ordinarily set in cost-benefit evaluations, and involve reassessment of the ethical premises that should be applied when determining the relative value of alternative land-use plans.*

In the vernacular, planners encountered vociferous opposition that required them to slow down and rethink their priorities. Another case study is the sixty years of planning and explosive growth in Toronto. It makes for some very interesting reading, which I'm guessing the Council and its planning department would find enlightening. The title tells the story, I think: "Smart Growth and Development Reality: The Difficult Co-ordination of Land Use and Transport Objectives." This, again, is from the abstract:

**Findings highlight the difficulties of pursuing such policies due to the power of neighbourhood-based interests, disagreement among jurisdictions within the metropolitan region and changes in priorities and intervention capacity. The article ends with proposals that seek to enhance the possibility of transforming the structure and dynamics of cities in ways that are compatible with smart growth principles. With the information that I've found, I'm left to wonder if you are well served by your Planning Department staff. Rushing ahead with radical rezoning has the potential to turn our city into a war zone.** The courts are an uncertain and expensive arena for the settling of "takings" issues, and some recent cases have been decided in favor of aggrieved property owners, as was seen in two cases in Minnesota: *McShane v. City of Faribault* [292 N.W.2d 253 (Minn. 1980)], and more recently in *DeCook v. Rochester Intern. Airport Joint Zoning Bd.* [796 N.W.2d 299 (Minn. 2011)]. **I believe there is a method that is more just, and more sane.**

I close with these questions that arise from the proposed rezoning surrounding the 145<sup>th</sup> street and 185<sup>th</sup> street Metro Transit Light Rail Stations:

- Where has a "Planned Action Process" for radical upzoning of this scale and degree change of density been carried out, and what lessons were learned there?
- Where has public opposition had a significant effect on the scope of redevelopment in a neighborhood with existing dense single-family housing.
- In the course of the decades approaching max "best" use, what is the course of property values in response to the introduction of large dev. blight?
- What is the tax structure you intend to apply and on what time frame?
- Will there be any Mitigation of negative economic and quality of life impacts upon residents who are unable to respond to growth?
- Who is choosing the winners and losers in this process? Will it be the "free market" and the corporations best able to take advantage of it?
- Will any attempt be made to preserve views from Paramount Park, as these are unique in all of the City of Shoreline and one of the chief amenities there?

Thank you for considering these remarks  
Jeff Eisenbrey

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Property values and taxes” and “Eminent domain” sections. The City notes the commenter’s questions and opinions.

**From: Michael and Stephanie Hill****Received: February 5, 2015**

To Whom It May Concern:

We are writing with regard to the proposed rezoning for the 145<sup>th</sup> St. Light Rail Station. I would like this letter to be part of public record. My address is 831 NE 151<sup>st</sup> St.

We are homeowners in the Ridgecrest Neighborhood and our family (including 2 young children) will be directly impacted by the rezone decision. While we, and many others, are excited about the potential that the Light Rail redevelopment area has to offer on current and future residents’ accessibility to downtown and infrastructure enhancements that would improve our quality of life here, we are deeply concerned about the pace of decision making and scope of the high density proposals that are still being considered by the City Council and Planning Commission.

We have attended a number of the City Council and Planning Commission meetings that have explored the range of rezone density options that are still being considered and we strongly oppose the higher density option of MUR 85 because there has been no evidence that suggests that this is either appropriate for this area nor will it have a positive impact for current or future residents here (especially homeowners and families). It has also been clear at each of these meetings that citizens oppose massive, large scale rezone options and has urged the city to focus on smaller scale options. A vote now on a massive scale rezone would devastate this community and ruin the quality of life for us here while we try to live through constant degrees of construction and redevelopment. We love our city and have strong and long term investments in our community and urge you to consider this in your decision making.

I urge the Planning Commission to slow the pace of voting and be thoughtful of the people that currently live in the communities impacted by the rezone. Please focus your considerations on both the current, as well as future, residents that live here. A phased approach to the rezoning is not only fiscally responsible, but it will ensure that the City of Shoreline is constantly in a strong negotiating position to dictate

city goals and priorities, parameters for developers and other regional partners. The citizens of Shoreline will provide strong support for you on this.

The city of Shoreline has become increasingly popular for young professionals and families over the years and has a reputation for being affordable, safe, stable and family friendly. Excessive rezoning that includes high density rental developments would ruin the positive reputation that the City of Shoreline has worked hard to build in the region and dramatically alter the visual cohesiveness of the neighborhoods in the rezone area. A slow paced, phased, economically and environmentally sensitive approach to the redevelopment is the way to go.

Please feel free to contact us with any questions.

Sincerely,  
Michael and Stephanie Hill

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to delay decision-making” and “Request to phase zoning” sections. The potential to phase zoning is analyzed throughout the FEIS.

**From: Nancy Treibel**

**Received: February 5, 2015**

Please slow down and think about the adverse results of immediate rezoning will do the current citizens of shoreline and all those who have been homeowners since the 1950’s and brand new homeowners in the last few years here in the single family, “starter homes as I heard we were called” in the 145th rezoning.

To answer some questions posed: Yes a lot of us want light rail. Yes we voted for light rail. Yes we have planned on helping pay for light rail through our taxes. AND Yes we know we will have to put up with not only the noisy sound panels we already have but also the noisy elevated rail cars to come

But No we do not want our life savings in our biggest asset, our houses, disappear with the immediate zoning because buyers are only looking for the value of the land. According to council members and planners, it will be at least ten or more years before developers are ready to build. For us, it will mean the loss of considerable future funds for retirement, health issues, and college educations for our younger families.

No we do not want a neighborhood that has to balance future loss of money with new roofs, watering lawns and trees, keeping up simple repairs or the worst having to abandon the property because making mortgage payments on a house of no value is quite senseless. This is how blight begins.

We choose to live in Shoreline or voted for the City of Shoreline way back when we were unincorporated King County. There are many, many issues to be resolved than just the rush to rezoning but the Financial Burden placed on the backs of 145th subarea residents is horrific.

Want to make all of Shoreline equal: Rezone the entire area and see if any other area is in agreement to the financial burden placed upon their homes.

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, “Property values and taxes”, and “Growth management and sustainability” sections.

**From: Shoreline Preservation Society, c/o Janet Way**

**Received: February 5, 2015**

Dear Planning Commissioners, Council and Mr Szafran:

Shoreline Preservation Society is a WA State Non-Profit made up of people living in and around Shoreline who work to protect the environment and preserve the quality of life here. We request to be made a party of record on this matter with legal standing. We incorporate by reference all comments, documents and discussions in this and the 185<sup>th</sup> Station Area processes.

We are tonight providing preliminary comments in this hearing. SPS notes that we are doing additional research and reserve the right to provide additional information up until the Council action, taking note that this is a legislative matter.

We believe there will be significant adverse impacts to the environment from the massive rezones planned.

The “Planned Action” will leave residents who wish to give input on details not yet analyzed left out. New residents, who move here in the next years, will also have no rights to comment or play a part in the future growth. We urge the Planning Commission to reject this aspect of the proposal.

One statement from your DEIS on the 145<sup>th</sup> Station Area seems to sum up the attitude of the City towards the communities impacted by these proposals. From **Changes in Neighborhood Character** section of DEIS:

***The City acknowledges that even though a decision to stay or sell is entirely up to the property owner, those who feel as if their neighborhood is changing beyond their comfort level may still feel forced out. The City also acknowledges that even for those who support change, transitions and construction can be uncomfortable and unpleasant.***

Key areas still are not addressed and as yet are not properly covered in the DEIS. Most outstandingly the segregation of the environmental review between 145th and 185th. It as if they are in two separate time zones or another county. This is a very big flaw and must be addressed in the SEPA.

• **Cumulative Impacts on Traffic** from both Light Rail Station Areas –

Traffic impacts of the stations alone combined will have huge impacts on Shoreline. Any child could tell you that, and yet this is seemingly not studied in the DEIS. And the impacts with the proposed full buildouts is likely to be even more devastating.

• **Cumulative Impacts of on Infrastructure** for both Light Rail Station Areas –

It is pretty clear that in all of the documents that have been cluttering up the City Light Rail Station Area webiste, there is seemingly nothing that looks at the impacts that both Station areas have together on each other or the entire community. What will be the true cost of these cumulative upgrades to benefit all the development and who will pay for it?

- Drainage and stormwater runoff – Impacts to sensitive areas and salmonid streams
- Wastewater Utilities
- Water Utilities

- **Displacement** – What will be the impact on the existing community of displacement of a large number of residents? Where will they go? How will they pay for this impact to their families?
- **Blight** – The 145<sup>th</sup> Neighborhood in Ridgecrest is currently a healthy neighborhood of nearly 100% single-family homes. What is the potential for blight resulting from speculative development, transitions to rental property that will be imposed on these neighborhoods? The effect of spot development could subject both Light Rail Station Areas to blight. What will be the impact on property values and potential for homeowners to sell and buyers to get mortgages? This is not adequately addressed in conjunction with both large subareas and how that will impact the surrounding neighborhoods.
- **Open Space and Parks** – Parks and Open Space are a requirement with density in the Growth Management Act. And yet the provisions in the DEIS and the Preferred Alternatives for increasing or enhancing Open Space are very inadequate. Existing useable Open Space for current population is already inadequate, projected at 2,886 to 5,314 new residents as stated in the DEIS (pg-3-183). Only one new park is suggested to accommodate all of these new residents. Private open space is not a substitute for Public Open Space. There are numerous opportunities in the Station Area that could be utilized to provide more open space access and recreation.

Paramount Park Open Space is the largest remaining wetland and creek corridor left in the City and Thornton Creek Watershed. It must be protected and enhanced to increase wetland function. The neighborhoods surrounding it, which lay on wetland soils, should be reserved in R-6 to provide future locations to increase open space acquisition opportunities. A large wetland also exists along I-5 in the Light Rail corridor that should be acquired for Open Space. Also the 9<sup>th</sup> PI NE corridor is a bonafide liquefaction zone according to FEMA and City Emergency Mapping because of specific soil types. These areas are not suitable for denser development due to unstable soils and high water table.

Jackson Park Golf Course, which is a public course in across 145th St., It provides vistas and clean air and water assets along with the recreation and walking trail. This site is a tempting target for development and expansion of the Highway 523 corridor, as laid out in the Lander Economic Study. Impacts to this historic open space, just to accommodate density would be a tragedy.

*“Over the long term, LCG sees Jackson Park Golf Course as a potential development opportunity site. Fewer Americans are playing golf every year, and by some reports, 300 golf courses around the county have closed in the past decade. While the City of Shoreline cannot control the future of this course, it should continue to monitor the site and be prepared to partner with Seattle in the event it becomes available for reuse in part or whole.”*

A Green Street Grid has been proposed by community members, supported by Thornton Creek Alliance. This could provide valuable trail and natural drainage solutions and connect sections of these neighborhoods to light rail, but only if well designed.

- **Priority Habitat and Critical Areas Connectivity** –

The value of existing and under-protected Priority Habitat areas and their connecting stream corridors between both station areas has also not been identified for either Fish Habitat or other wildlife such as birdlife. The DEIS claims that existing regulations will adequately protect our parks and priority habitat areas. That is a big concern considering that these areas are already underserved and underfunded to protect water quality, prevent flooding and encourage returns of salmonids.

- **Emotional Impact to the Community** – Anxiety and distress suffered even now by thousands of resident vs supposed certainty? There is little certainty anticipated after this plan is completed. Anxiety and uncertainty of the future will loom over the residents of this single-family neighborhood for decades and the “market oriented” growth proceeds unchecked by any input from the community.

- **Salability of existing single-family homes?** Ability for buyers to obtain a **mortgage** in zones with “non-conforming use” labels?

- **Parking Impacts** – What has happened to neighbors along 12<sup>th</sup> NE with parking from apartment dwellers being a major aggravation is an example of what will replay over and over in the 145<sup>th</sup> Station Area if new multi-family dwellings do not have mandatory parking provided.

Overall, this proposal is too big, too much, too disorganized and the public is still left largely in the dark with this massive mistake for our community. We urge the Planning Commission to reject this Planned Action Rezone and Subarea and send it back to the drawing board. Remand to staff to come back with a much smaller footprint plan that protects the rights of this community and our community values.

Respectfully Submitted,

Janet Way, President  
Shoreline Preservation Society

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to delay decision-making”, “Cars and parking”, and “Property values and taxes” sections. Cumulative impacts of both station subareas are incorporated into analysis throughout this FEIS. Many of your concerns about priority habitats will be addressed through the City’s Critical Areas regulations. Your concerns about acquisition of additional park and open spaces are being

considered through the update of the Parks, Recreation, and Open Space Master Plan. Specific information about traffic, parking, stormwater systems, sewers, water, open space, parks, and habitat and critical areas can be found in the Chapters 3.3, 3.4, 3.5, and 3.7 of the FEIS.

**From: Jan Stewart**

**Received: February 5, 2015**

To the Shoreline Planning Commission:

I live in the 145th Station Rezone Area. My immediate neighborhood, where I've lived since 1992, is just west of Paramount Park Open Space. It has become clear over the years that this area has been viewed as a development opportunity since the city began taking a look around after incorporation in 1995. This is particularly concerning since I live in a liquefaction zone, (according to maps provided to our neighborhood by city staff for emergency/disaster preparedness), so in my opinion putting in higher density where I live would be a pretty crazy idea, given that earthquakes are inevitable in this region.

We've had a variety of designations on city maps over the years. First we were referred to as a "Special Study Area". Then we were included as part of the SE Sub Area Plan – which by the way went as far west as 8th NE. Now that border has evidently been re-drawn (without notice) and we've been incorporated into the high density area surrounding the proposed 145th St. Station. These shifts and changes make it very difficult for me to trust city process. The following excerpt from the city's report for the SE Sub Area Plan, adopted just a few years ago in 2011, is one reason for my mistrust. (\*my emphasis added)

*The plan is intended to provide **direction for the next 20 years**. Many things will change in that time period. By 2030, there will likely be a light rail stop near 145th St. and Interstate 5. New automotive technology may have transformed the fueling, design and maybe even necessity of cars. Successive generations may have different preferences for building and neighborhood design and amenities. New technologies may spur new industries and the job base and commercial districts will likely grow and evolve. **Yet while contemplating these uncertainties and determining how to incorporate them into the long-range vision for the subarea, the City wants to preserve existing aspects of these neighborhoods. The single-family character, friendly atmosphere, natural amenities, and other characteristics are all of paramount importance.***

Speaking of *paramount importance* - Paramount Park Open Space is a big reason why I love my neighborhood so much. Its trails connect different parts of the neighborhood, bringing neighbors together from everywhere surrounding it. This park is responsible for creating long-

lasting friendships and great memories, some of which were formed while actively preserving and enhancing the park's natural features and hydrology with projects over many years, beginning well before the City of Shoreline existed. The park's beautiful creek, ponds, wetlands, trees, vegetation and abundant wildlife provide all of us who walk throughout the park some respite from our busy lives. This place adds beauty to our community and, I believe, heightens awareness of and appreciation for living things. Because of all this, I think it's of *paramount importance* to actually plan for the huge increase in density in our future. The maps show no parks in the mix with all the higher density buildings and the DEIS seems to say "just trust us", (as I said, I'm struggling with the trust thing).

So, why not expand this right along with the increase in density? Why not do something wonderful for future generations? How about setting aside the entire area between 12th NE and 8th NE by retaining its R-6 zoning, and then as density increases, so can park and open space increase. After all, this area's wetland function will absolutely be needed during storm events with the increased surface water runoff expected from increased density. A longtime resident-neighbor, who has now passed away, remembered that at the time when 145th was a still an unpaved road, some areas along 15th NE that periodically flooded from storm water were actually pumped into what is now called Paramount Park Open Space. The water has to go somewhere...

People around here know each other and know the neighborhood history because people stay here or move back because they grew up here. We have big block parties where that history is shared. We have several generations of families here, some in the same house, some in neighboring houses. The turnover of houses is infrequent, but when new neighbors move in they are welcomed. We have many young families who love it here and are so thrilled to be able to afford a home, and have no plans for moving. Our modest homes *are* "affordable housing."

I favored the station being sited at 145th (even though closer to me) in part because I naively imagined that at 145th there would be fewer negative impacts on neighborhoods than the 155th Street location. Clearly I was wrong. The two preferred rezone options are extreme and very unsettling to say the least. It's a shock to see maps of all the homes in my wonderful neighborhood completely gone, and hard to not feel under threat. The cruelest part of this process may be that while we who live here are being asked for input, this re-development "plan" has nothing to do with us. This is not for us, rather for some nameless, faceless future population, and the developers who will benefit from building it.

Furthermore, the intense level of density being proposed by the city is not necessary to meet either GMA targets or Sound Transit requirements, and is in fact, unprecedented in its size and scale. This is very troubling. My concerns are compounded by this tremendous increase in Shoreline's density being concentrated only on the east side of our city, completely wiping out many well-loved neighborhoods with the combined rezone areas for both 185th and 145th. Together these rezone areas will have enormous impacts on everyone.

My neighborhood stories are not unique. How are so many thousands of us supposed to accept that our homes, our lives, are so expendable? And so urgently? Where are the protections (or mitigations) for us? I've not found them in the DEIS.

As I said when I wrote to the Planning Commission regarding the 185th Station Area rezone, I am not opposed to light rail, or the stations, or increased density, or economic growth if well planned. Leaving everything to market forces is not a plan. Development will be random, which is the opposite of a plan. The *market forces* approach will not protect the interests of homeowners. However, from what I've read so far, there will be plenty of incentives for developers. I ask that there be a reasonable balance. At this stage, the "plan" is definitely one-sided.

I would support a more reasonable, much smaller, scaled down rezoning option, including moderate, incremental, predictable (phased) upzoning via triggers such as having the station actually running, or utilities such as water/sewer infrastructure in place. Phasing will:

- Provide some benefit current homeowners during transition to higher densities
- Provide opportunities for city to observe how developments are working before expanding into larger area
- Discourage blight caused by random development within a large area
- Well defined increased park and open space to accommodate and keep pace with the increase in population, incorporating protection of trees and wildlife habitat as well as other benefits to the watershed with consideration of the topography, stream systems and other natural features.

Single Family Homes as a Conforming Use in all zoning designations. If single family homes become Non-conforming, it will:

- Discourage maintenance of houses, causing blight
- Be a disincentive to stay, effectively forcing people out
- Create problems for financing both for any minimal/allowed improvements and for prospective buyers. These vulnerable homeowners would definitely not have the decades to plan and make decisions as the city purports.

The DEIS acknowledges in the *Changes in Neighborhood Character* section, that: *Major areas of concern include how transitions in the character of the neighborhood, and physical transitions between different land uses, will be managed. And: Some have expressed their disapproval regarding this level of change and have questioned why the coming of light rail should be accompanied by significant upzoning.* Not only does the DEIS not even attempt to address these questions, it essentially says "tough!" Here's the statement: *The City acknowledges that even though a decision to stay or sell is entirely up to the property owner, those who feel as if their neighborhood is changing beyond their comfort level may still feel forced out. The City also acknowledges that even for those who support change, transitions and construction can be uncomfortable and unpleasant.*

It doesn't have to be this way. I believe it's the city's job to represent its citizens and do everything it can protect their interests. This is entirely possible. I will hold out hope that my trust will be restored.

Thank you for reading my very long letter and for considering my perspective. Thank you to each of the Commissioners for all your volunteer efforts on behalf of our Community.

Sincerely,  
Jan Stewart

**Response:**

General substantive issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Request to phase zoning" and "Affordable housing" sections.

Thank you also for pointing out the overlapping boundaries of the Southeast Neighborhoods and 145<sup>th</sup> Street Station Subarea Plans. The City will remedy this potential inconsistency. Regarding your points about parks and natural hazards, these will be addressed through a couple of different avenues, but are also discussed in more detail in Chapters 3.4 and 3.5 of this FEIS. Concerns about building in liquefaction areas and wetlands will be handled through the City's revised Critical Areas regulations. The needs for new park and open space will be addressed through the update of the Parks, Recreation, and Open Space Plan.

**From: Vicki Westberg**

**Received: February 5, 2015**

Letter to the Planning Commission and City Councilmembers:

Regarding the matter of rezoning in the City of Shoreline I find many issues involved, some really important ones, that haven't even been addressed yet. And I was dismayed at staff's three point assessment of the arguments that residents were bringing to the discussion, which showed a complete lack of understanding and dismissal of those arguments. Might we also say as a comeback that no matter what is said, what facts we present, no matter how much sense we make there are those in responsible positions who refuse to listen? No, change for the sake of change is not necessarily good.

I am for building the light rail stations at 185th and 145th, including infrastructure in the immediate vicinity as needed for parking and such. After that, incremental rezoning at say ten year intervals while studying the effects, positive and negative of the existing zoning. This would give us time to consider the best course of action and doesn't really slow down the process. In fact "haste makes waste" as they say. There is no need to rush headlong; indeed it is folly to do so.

If people are moving to Shoreline it's because it's a nice place to live - as it is - now. That means single residence homes, trees, wildlife, space between houses. More population, more density will squeeze out the very values you profess to be preserving. No, population growth is not necessarily a good thing. Studies have shown that crowding people leads to anxiety, among other things. Empty units and empty buildings left that way either by building too far ahead or because of changing economic conditions, for whatever reason, also lead to anxiety and lack of pride in one's surroundings, one's neighborhood. That leads to vandalism, graffiti, and crime all at taxpayer's expense and at the expense of the taxpayer.

What about the quality of construction? Nothing has been said about holding the developers to standards, not just building codes. Will it look like the huge apartment house in Lake City which is yellow, blue and gray in color? Will it be the luxury condos on another street corner in L.C. that have a view of the backs of businesses, parking lots and dumpsters and yet are still not affordable? What a shame to sacrifice what we have now for that and call it progress.

Thank you for your consideration.

Sincerely,

Vicki Westberg

Resident since 1973

and proud of it.

Please enter this letter into the public record. Thank you.

**Response:**

General substantive issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Why plan/zone now" section; phased zoning is analyzed throughout the FEIS . Design and transition standards will regulate what development looks like within certain perimeters, but it is impossible to know at this time exactly what they will look like with regard to specific design and color schemes.

**From: Jan Helde**

**Sent: February 5, 2015**

Shoreline Planning Commission,

I apologize for my earlier email that was sent before I was finished.

Below are my comments regarding the rezoning of Ridgecrest due to the two Sound Transit Light Rail Stations.

- 1) I do not believe that enough has been done to inform the public that will be affected by the rezoning. I spent over 4 ½ hours two weekends ago going door to door and talking to neighbors about the rezoning. In that time, I only was able to talk to 9 neighbors. One neighbor said they did not care, not because they were against the rezoning but in their words “I’m a fatalist” and did not think anything he did would make a difference. One neighbor did not know the rezoning affected our neighborhood directly. The rest all talked about how unfair and wrong it was that the city council was ruining our neighborhood, but few knew they could contact the city council to make a difference.
  
- 2) The various entities commenting on the city’s rezoning conflict. One of the city council members said that “we have to stop urban sprawl.” So he wants to build up Ridgecrest, the largest single family neighborhood in Shoreline into a community like Ballard? That may stop urban sprawl, but creates urban blight.

One of the plans showed MUR 85+ around the light rail station, but after many adverse comments by the public, I heard the council was considering lowering that to MUR 65. Then when Affordable Housing commented at the city council meeting, they kept referring to MUR 85+. That is a 7 + story building. Even the buildings at 175 and 15<sup>th</sup> are not that tall. How can you justify a 7+ story building in the middle of a residential area and why, if the council was serious about reducing the level to MUR 65, didn’t Affordable Housing know of this decision?

Affordable Housing said it would be preferred to have their housing next to the light rail, but they also said that if a builder did not want affordable housing in its construction, it could pay a fee to put in a trust for someone else to build. So the whole concept of putting affordable homes near the line may not happen.

One of the city council members said they were doing this rezoning because they are required to do a 20 year expansion plan. However, they also made the comment that the extensive rezoning will cover the next 50 years. The rezoning should be based upon the economy of the area, what the market will allow, not a massive build-out that may or may not be utilized, but will certainly affect the residence.

The residence have been asking why this has to happen all at once, why not a phased in rezoning. The planning committee that I have listened to said we need to do this now, and yet at one of the city council meetings, one of the planning committee member said that there was a phased in plan. That has not, to the best of my knowledge, ever been sent to the public to give input.

3) Taxes.

The public has been told that developers would carry the majority of the cost of development, however, that does not take into account the cost of school levies for the increase in school age children, the cost of upgrading all of the water lines and sewer lines and the cost that the city of Seattle will charge Shoreline if Seattle needs to upgrade its sewer line due to our output.

By rezoning our property, even to MUR 35 we will be taxed at a higher rate than a single family lot, so we will carry more of the tax burden.

4) Traffic.

We have been told that 5<sup>th</sup> avenue is wide enough to take on the massive increase in traffic, and yet 145<sup>th</sup> is still in limbo and will not be able to keep up with the increase in traffic. How can 5<sup>th</sup> take the new traffic and not 145<sup>th</sup>? Your plan puts sidewalks on 8<sup>th</sup>, and yet when we asked the city council for sidewalks, we were told the street was not wide enough. The city planners installed a great drainage plan on 8<sup>th</sup> where there is a slight dip on the east edge of the paved road, so when it rains pedestrians walk in the draining water, that works real well. But if we agree to rezoning, you will put in sidewalks.

5) Bottom line, we all know rezoning will happen, but there has been no reason for the expansive rezoning you are suggesting. Rezone near (a block around) the stations and let the market decide when the next rezoning should be done.

Jan Helde

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors the influenced potential zoning scenarios”, “Why plan/zone now”, “Request to phase zoning”,

"Affordable housing", and "Property values and taxes" sections. Specific information about housing and traffic can be found in the Chapters 3.2 and 3.3, and the concept of phased zoning is addressed through the FEIS.

**From: Myrna Haigh**

**Received: February 5, 2015**

I attended the January 29th Special Public Hearing on the 145th St station. There were numerous public comments from Shoreline residents clearly describing all the perceived impacts to the traffic, parks, and general changes to the Ridgecrest /145th St Corridor.

After the comment period was over, one of the first responses was from the Planning Commission Chair, Mr. Keith Scully, who stated that he lived in the Ridgecrest area, and could see there would be some major impacts to the traffic and neighborhood. He suggested and recommended that this proposal may take additional time for further study. This recommendation was seconded.(I do not know who seconded because the minutes of the meeting were lost.)

Does not Mr. Scully, anyone else on the Planning Commission, or anyone else on the City Council understand these same significant impacts to the traffic, zoning, and people, etc., are scheduled to be approved on February 23, 2015 for the 185th St Corridor?

Does this mean, despite all the public comments requesting the 185th St station be delayed for further study and intelligent planning, that we can only expect to slow down the project if we were to have a Planning Commission or City Council member living in the targeted area?

I challenge the fairness and prejudice in moving forward on the 185th St Corridor project when the Chairman of the Planning Commission, who lives in the Ridgecrest area, is able to secure a delay in action for the 145th St project. I guess it is the old adage or mentality of "not in my backyard." This shows an extreme lack of propriety with this process for approving these two projects.

Myrna Haigh  
Shoreline Resident

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to delay decision-making” section. Issues related to traffic and parks are discussed specifically in Chapters 3.3 and 3.5 of the FEIS.

**From: Judy Lehde****Received: February 9, 2015**

I found an interesting article in Thursday, Feb. 5 “Seattle Times”. It was titled “Price skid triggers alarms in North Dakota oil towns.” You might think what does this have to do with Shoreline. In Watford City, North Dakota, their plan was to transform the city “from a chaotic, sprawling crash pad for transient workers into a larger, more livable community”. Everything was going along fine until the price of oil started dropping. Developers have come in over the past 5-10 years and built housing, but the infrastructure was not taken care of. Their roads are dangerously crowded; utilities are overtaxed; and schools jam-packed. Aaron Pelton, a bar owner in Watford City, said “At this point, it’s like downtown Seattle. If you can’t come to a small community and have a quality of life, what do you have?”

Shoreline is not a large city. It is a city of primarily of single family homes and most of the residents moved away from Seattle to Shoreline to get away from density housing, the big city feel. The city staff and city council see the need for TOD (Transit Oriented Development) around the 145<sup>th</sup> and 185<sup>th</sup> Light Rail Stations and we do need some higher density housing close to the station, but a ½ mile radius is good enough. One of the leading experts on this subject says (<http://its.berkeley.edu/btl/2012/spring/tod>) “You don’t want to go into established single-family, middle income neighborhoods and attempt to spawn TOD.” I think he would tell the staff and the council to scale back their massive plans for Shoreline.

At the Shoreline Planning Commission Hearing on February 5, all the residents who spoke asked you to slow down this massive rezoning project. I agree.

Judy Lehde

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to delay decision-making” section.

**From: Sharon Cass**

**Received: February 14, 2015**

Would it be possible to forward this email I sent to the Shoreline City Council to the Planning Commission? I do understand the deadline **WAS** Friday, February 13, 2015. If this would be allowed this one time, I promise to not make a habit of doing this. It was all I could do to type this email one time. Being this is and will be public record I will not continue on the reason I am asking you to please - this once - to forward this comment for me.

I will thank you at this time if you will be able to help me,  
Sharon R. Cass

**Response:**

Yes, your comment letter below was shared with the Planning Commission and is included below.

**From: Sharon Cass**

**Received: February 13, 2015**

The back of our property joins Twin Ponds Park (TPP). The water table for the last 10-12 feet of our property (North end of our yard/South end of TPP) is so saturated in the mid-Fall, all Winter and at least the first part of the Spring that we cannot walk back there without boots least we have water over the top of "regular" shoes!

I have photos showing all the pooling of water in TPP and within inches of our back fence. At the extreme north-east corner just behind our fence I have a photo of TWO ducks swimming in the pool - yes! it is that large and deep. There also is a sign IN THE PARK that shows: NATIVE GROWTH PROTECTED AREA. This stream buffer is protected to provide wildlife habitat and to maintain water quality.

Please do not disturb this valuable resource. No cutting or removal of native vegetation is permitted.

Alteration or disturbance is prohibited by law. Contact the City of Shoreline at 206-546-1700 for further information.

THAT IS AN INTERESTING SIGN.....is the Council aware of that sign and its meaning? If the Light Rail system and all the concrete AND the 3 - 7 feet buildings go in at 145th St. it seems like all that "commotion" that will be brought in.....would not be good for the animals that live

in the park. Just about anyone around here will tell you we have seen up to SEVEN raccoon AT A TIME, blue heron nesting in TPP by the pond in the southwestern area, dozens of ducks and geese at times of the year, etc.

It seems like this Light Rail system should be sent further to the north - even past 175th St. Yes we MAY need?? the rail but it would be disturbing so much wildlife at the park, two elementary schools (young children and traffic do not usually mix - at least all the traffic that would be coming in.

Please rethink the 145th St. project. We bought our home here on N. 149th St. because it was such a relaxing lovely area BACK IN 1963!! Yes, over 50 years ago same home and same marriage!!

There are roads in the area like 5th Ave. that are already so wide it seems like "you" would be more cost effective to go that way. PLEASE don't destroy so many lives here - slow down and really think of the devastation that will be caused.

Thank you,  
Sharon R. Cass

**Response:**

General substantive issues are discussed in more detail in the "Request to delay decision-making" section at the beginning of this chapter. As you are aware, during the break in Subarea Planning the City performed additional analysis on the area surrounding Twin Ponds Park, specifically with regard to the wetland, water table, and peat soil conditions. In the Compact Community Hybrid zoning scenario, the area south of Twin Ponds Park retains single-family zoning as an added protection for the wetland. However, even if zoning were to change, Critical Areas Regulations in the Development Code provide protections for the park, including the vegetative habitat for raccoons, herons, ducks, and geese. This information has been incorporated into Chapter 3.4 of the FEIS.

**From: Carolyn Hope**

**Sent: February 13, 2015**

Dear Council, Planning Commission, and Administration,

Please consider these comments for both the Planning Commission's consideration of the 145th Street DEIS and the Council's consideration of the 185th Street EIS. I am unable to attend the meetings in person.

According to the DEIS, Shoreline's projected growth in the next 20 years is 13,920 new residents and 7,200 jobs. The proposal for the 145th Street Station Area is projected to add up to 13,635 new residents and 2,678 jobs. I am supportive of this growth. Our region needs to plan where future residents and jobs will be located so we can do this type of planning. However, I am concerned about how this growth is distributed. We have the proposed city center to develop, lots of mixed use development proposed for Aurora, North City, possibly the Costco and Sear's shopping complexes, and other neighborhood centers. We also have another major Sound Transit being planned that is projected to accommodate up to 5,399 residents and 928 employees (which seem low for the amount of 85 MUR proposed). It doesn't appear that we have 85 MUR anywhere else in the city and I wonder if the stations are best place for this type of zoning and I wonder if this type of zoning should also be considered elsewhere in the city.

With the proposals for both stations, I am concerned about the extent of mid to high MUR zoning across the neighborhoods. For the 145th Street Station, I believe clusters of MUR developments at the station, along part of 5th NE, 1st NE, 145th, and possibly 155th between 1st and 5th seem appropriate, but the extend of this zoning appears to reach too far. For the 185th Street Station, while it has far less growth projected - it has a wide reach for medium to high density. It seems unreasonable for so much 85 MUR to succeed and blend in with the community character.

Related to this, I am concerned about the ability of Shoreline to support another town centers away from the transit stations, such as the one proposed at 155th and 15th NE.

I encourage the City to create strong design guidelines so that we end up with well planned out neighborhoods with strong architecture, rather than the very disappointing new developments like those in North City and the new residential buildings along Aurora. One way to have more control over this is to require rather than allow master planned developments of a certain size. Also, please ensure that the new zoning includes minimum densities as well as maximum densities as a way to ensure the community character develops as planned. I also hope that new regulations that are generated as a result of these plans include new parking strategies and incentives such as shared parking, the possibility of no parking minimums, and significant bicycle parking requirements in residential and commercial buildings and at the stations.

Overall, this is a step in the right direction, we do need more density at and near these stations, but more attention should be paid to the height, density, and area to which this density is applied.

Thank you,  
Carolyn Hope

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors the influenced potential zoning scenarios” and “Cars and parking” sections.

**From: Nathan Moore****Received: February 15, 2015**

Hello there,

A friend who lives down 150<sup>th</sup> street from me showed me the plans for the development of the area around the 145<sup>th</sup> light rail station and I have serious problems and concerns with these plans.

First, re-zoning single family homes to force families out of them is completely wrong and a horrible thing to do. Everyone should know that single family homes (especially those near schools) are the gold standard for a successful, thriving, and safe community. We should be adding single family homes, not demolishing single family homes and replacing them with apartments or retail stores. If you want to have an area of shops near the light rail station, the churches off of 1<sup>st</sup> street are a perfect area for them and provide lots of land without ruining the value of family’s homes.

Next, the residential streets, such as 149<sup>th</sup>, 150<sup>th</sup>, Corliss, etc. should not be widened and turned into arterial routes. Once again, these are residential areas for single family homes, many of which were purchased because of how close they are to the school on Meridian. There is all ready way too much traffic on these streets, and we should be working to make them off limits to people who do not live there, not widening them. If you want to add walking paths and bike lanes, they should be done on the existing arterial streets (such as 145th, Meridian, and 1st) so that residential streets are not made unsafe by increased traffic. Twin Ponds Park is also an excellent location to add walking and bike paths. There is all ready a walking path through the park from 1<sup>st</sup> to Meridian. This path should be widened for walking and bikes and have lighting added to it. This will keep traffic off residential streets and still provide a safe walking/biking path.

Very seriously, I really wonder who drew up these plans? Again, seriously, please provide me with the names and addresses of the people who drafted these plans, because I doubt they live any where near here. These plans do not benefit the people who live in this area, and in many cases, as I mentioned above, make the area much worse. Did a developer make these plans, because unless I was wanting to buy cheap land and develop it, there is no other logical reason for how horrible these plans are for the people currently living the area and the destruction they were do to this community if implemented.

To be clear, myself and my neighbors will fight against any action to rezone people out of their homes and to make residential streets into unsafe, high traffic, high pollution areas. Please hold a conference with the people who ACTUALLY live in the area so that they can draft new and appropriate plans to build a safe, successful community, NOT one that is built for only making money and destroying the community.

Sincerely,  
Nathan Moore

**Response:**

General substantive issues are discussed in more detail in the “Growth management and sustainability” and “Eminent domain” sections at the beginning of this chapter. Regarding your assertions that the City will force people out of their homes or widen multiple roads within the subarea, these are not accurate. More information about traffic is included in Chapter 3.3 of the FEIS.

**From: Chris and Shanon Harris**

**Sent: February 15, 2015**

I believe the planning commission has used the building of light rail stations as an excuse to fulfill their development agenda. There’s something in the DEIS about surveying people who said they want multifamily high density development. The people who actually live in the affected neighborhoods weren’t asked. I have lived in this neighborhood for over 20 years and fail to see why single family homes, especially ones with yards, are undesirable.

Yes, development will happen. Infill will take care of that. But the height limitations now in affect are what the citizens want. Rezoning established areas to wipe out whole neighborhoods is not in the best interest of the citizens of this city.

Examine your motives. Revisit your intentions. The citizens of this city, especially those who have chosen to live here for many years, deserve better than being told our homes and neighborhood aren’t good enough.

Shanon Harris

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**From: Chris and Shanon Harris**

**Received: February 15, 2015**

Mr. Szafran:

My preferred alternative for the 145<sup>th</sup> subarea is the Alternative 1 the No Action Alternative. The No Action Alternative may seem like a throw-away because it is required by law, but to me it is the only acceptable alternative.

To me increasing the allowable building height is unacceptable. Destroying whole neighborhoods is unacceptable. Destroying the character of neighborhoods and this city is unacceptable.

I believe building light rail stations in Shoreline is a good thing. That doesn't mean I believe an extended area needs to be redeveloped because of it. Redeveloping an area within a block of the new stations makes sense to me.

Please incorporate my comments into the public comments for the 145<sup>th</sup> Street Subarea Plan DEIS and consider them in upcoming decisions.

Shanon Harris

**From: Chris and Shanon Harris**

**Received: February 15, 2015**

I support the building of a light rail station at NE 145th Street. However, I do not support the City using that as an excuse to implement a radical rezone of the surrounding neighborhoods. Using 1/2 mile as a radius for rezoning is arbitrary and extreme.

MUR-35' and MUR-45' descriptions on the City webpage state these zoning types would allow mixed use (commercial uses on the bottom floor with residential units on the floors above) on arterials. Sixth Avenue NE, 8th Avenue NE, 9th Avenue NE, 10th Avenue NE, 11th Avenue NE, 12th Avenue NE, NE 148th Street, and NE 152nd Street are not arterials. But on several of the Alternative maps those zoning types are shown in these areas.

I like the concept of the Connecting Corridors alternative as a way of connecting NE 145th Street to NE 165th Street. However, I strongly object to zoning residential non-arterial streets as mixed use. What is the point of putting commercial businesses around Paramount Park? Or in the neighborhood around the Paramount Open Space? It seems the point is to destroy the character of the existing neighborhoods.

Excluding the areas within a two blocks of the proposed light rail station, I believe an alternative can be developed that utilizes the existing main roads (arterials) as mixed use zones while preserving the characters of existing neighborhoods.

Having a "transit-oriented" area should not mean single-family homes are excluded. I ride transit to work and live in a single-family home, as do many others. I think the planning commission and the DEIS have a narrow view of what "transit-oriented" means.

Shanon Harris

**Response to three sets of comments received:**

General substantive issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Factors that influenced potential zoning scenarios" and "Growth management and sustainability" sections.

With regard to your statement about potential mixed use buildings in the MUR-35' and -45' zones, a mix of residential and commercial is permitted in these zones. The restriction related to arterials is conversion of single-family homes into businesses. You are correct that the streets you listed are not arterials, and such conversion would not be allowed in these areas. The arterials within the subarea boundaries are Meridian, 1<sup>st</sup>, 5<sup>th</sup>, and 15<sup>th</sup> Avenues and 145<sup>th</sup> and 155<sup>th</sup> Streets.

**From: Adam Love**

**Received: February 15, 2015**

Dear Mr. Szafran,

I have been unfortunately unable to attend the planning workshops for the 145th station subarea plan, but I was pleased to find the information online. Regarding the three alternatives, I and my family would of course love to keep Shoreline mostly residential, as outlined in the "No Action" plan. We moved to our house just west of the Twin Ponds park because it was a beautiful, quiet neighborhood filled with other diverse families. I would hate to see this beautiful neighborhood swarmed with 35-foot condos or packed-in townhouses as outlined in plan

2 "Connecting Corridors." I don't want to see south Shoreline turn into Lake City--that district's plans sound an awful lot like the Connecting Corridors idea, and I don't think it's something my neighbors would be excited about. I understand that the light rail may inevitably bring growth and commerce, and perhaps the "Compact Community" plan has some reasonable growth features, but I'm distressed at the inclusion of the 85-foot zoning along I-5. Again, I don't think heavy density population is what makes Shoreline such a great place to live currently, and I don't think it's something we want to encourage.

Thank you for taking time to read my comments. I hope you'll take my thoughts into consideration when the city moves forward with a plan.

Sincerely,  
Adam Love

**Response:**

General substantive issues are discussed in more detail in the "Growth management and sustainability" section at the beginning of this chapter.

**From: Bethany and Bruce Staelens**

**Received: February 16, 2015**

Thank you for the opportunity to comment on the proposed 145th Station Rezone.

The Shoreline Area News reported:

City staff say they are hearing three themes from citizens regarding the rezone plans:

1. People, particularly younger citizens, are excited about light rail, and looking forward to greater density and the prospect of being able to bike and walk to coffee shops, and shopping.
2. Older people who bought starter homes 40 years ago are seeing a time when they will not be able to live in their homes because of mobility issues and health. They want to be able to get the most money out of their property to pay for their future expenses.
3. People who are excited about light rail but hate change.

This characterization is misleading and insulting, painting a picture of anyone who disagrees with the current plans as luddites or inflexible obstructionists with no meaningful input to add to the discourse. Moreover it is symptomatic of the attitude that pervades this rezoning process, and illustrates that the opinions and desires of the city council seem to outweigh the opinions and desires of its constituency. We moved to the Seattle area from the east coast 6+ years ago. We bought our house in Shoreline in 2009. Among the things that drew us to the neighborhood were

The proximity to the green belt and wetlands area and the abundance of old trees which allow a great deal of interaction with wildlife. As you walk down the streets in our neighborhood, the single most notable feature is the profusion of huge old trees. We can look out our front window and enjoy a wealth of wildlife – birds, squirrels, even the occasional raccoon. These trees also serve as much needed carbon sinks.

The friendliness and feeling of community. In our neighborhood we have progressive dinners, summer barbeques, neighbors who walk the circle and stop to chat. We have a neighborhood watch committee that helps us look after each other.

The pride residents take in their property. There are a number of avid gardeners in our area. They grow flowers and vegetables in the summer and people keep their yards well groomed and attractive. There are even several yards that have been certified as wildlife habitats by the National Wildlife Federation.

The convenience of access to mass transit in a livable area of single family homes. There are buses in the area and with the arrival of the Light Rail, there will be even more options.

Much has been made at recent meetings of the Planning Board and/or City Council of the idea of planning for Shoreline's future. In fact, this is where it seems the problem lies. **The plans, as laid out, are based on linear thinking that misses the bigger picture.** Proposed development is based on current modes of transportation and commerce which will change dramatically as technology advances. A cursory glance at advances in the last few years reveals changes to our daily life such as:

Online shopping: Everything from books to household goods to groceries can be ordered online and delivered.

Online banking has become safe and convenient, but has forced the closure or scaling back of brick and mortar banks.

Downloadable e-books have replaced many visits to local libraries.

These technological advances are but a few that have had vast repercussions and have changed the idea of business as usual. And as big as these changes have been, they are but a drop in the bucket compared to what lies ahead.

One of the biggest single developments fast approaching will be the emergence of self-driving cars. This technology will not simply take over the operation of the vehicle, they will lead to an entirely new way of using vehicles. This will, in turn, lead to many other changes in services and infrastructure.

Currently, cars are used less than 5% of the time. For the other 95%, they sit in garages and parking lots. Once a system of self-driving cars is established, individual car ownership will be unnecessary. It is estimated that within 20 years, subscriber networks will enable you to order a car when it is needed, similar to the way Uber works today. The difference is that the vehicle sent will be based on your need. Going a mile away? An electric car will do. Going to Bellingham? Better send a gas-powered vehicle. A trip to Ikea might require a small truck. And when you're through with the vehicle, it's off to pick up the next client, not sitting in a parking lot. Mass transit may still be useful, if it's close and your destination is on the route, but be it bus or rail, it will be far slower than calling for a vehicle which will afford door-to-door service for a similar cost.

Once all cars are self-driving, there will be no traffic problems. Sensors on the cars will regulate traffic and right of way. Traffic lights will be obsolete.

As a result of a more efficient system, there will be virtually no traffic accidents. This will mean a lighter load on emergency rooms, major changes for the insurance industry, no need for auto dealerships and vast improvements to inter- and intra-state shipping.<sup>1</sup>

And lest you think that this is a fantasy, these cars are currently in development by Google<sup>2</sup>, Apple, Sony, Audi, Volvo, Mercedes and others. Groups as diverse as KPMG<sup>3</sup>, the National Association of Insurance Commissioners<sup>4</sup>, the Huffington Post<sup>5</sup>, and the Cato Institute<sup>6</sup> all acknowledge that these vehicles will soon be a reality and will affect society in ways most of us have yet to imagine.

Taking this into account, we are forced to rethink what this rezoning plan will yield. If the city council simply wants to lure more millennials to Shoreline, perhaps the rezoning plan should be revisited to include neighborhoods all over Shoreline. It is unlikely that any demographic group can be convinced to occupy one or two specific areas. In fact, that seems akin to generational segregation. No, I think it is far likelier with the availability of Uber, Lyft, and similar companies now and driverless cars in the future, transportation will play a diminishing role in the choice of where new residents settle. Why not, then, spread out the opportunities? If every single-family neighborhood in Shoreline is rezoned for M-35 or M-45 housing, then no one neighborhood would have to bear an unfair burden. This would also show the citizens of the 145<sup>th</sup> Street and 185<sup>th</sup> Street areas that they and their properties are not being singled out.

To my way of thinking, a more thoughtful approach to rezoning should be undertaken. Some on the city council may argue that a great deal of time, effort and money have been put into the plans as they stand. I say that time, effort and money pales in comparison to the amount that the residents of the affected neighborhoods have poured into their homes and properties. The light rail isn't due to open in Shoreline

until 2023. SoundTransit representatives told me that a final decision on the route and stations is expected in 2015 after the Final Environmental Impact Statement (EIS) is published sometime in April.

Given the issues that residents of the proposed rezoning areas have voiced, rushing this process forward seems very ill-advised. I urge the city council to

- Delay the vote on the rezoning proposals
- Work with affected residents and the planning board to develop other possible alternatives
- Show good faith by making the process going forward more transparent and inclusive
- Thank you for giving serious consideration to our concerns.
- Please add our comments to the public record.

Sincerely,

Bethany and Bruce Staelens

<http://www.wisburg.com/wp-content/uploads/2014/09/%EF%BC%88109-pages-2014%EF%BC%89MORGAN-STANLEY-BLUE-PAPER-AUTONOMOUS-CARS%EF%BC%9A-SELF-DRIVING-THE-NEW-AUTO-INDUSTRY-PARADIGM.pdf>

<http://mashable.com/2015/01/15/google-self-driving-five-years/>

<http://www.kpmg.com/US/en/IssuesAndInsights/ArticlesPublications/Documents/self-driving-cars-next-revolution.pdf>

[http://www.naic.org/cipr\\_topics/topic\\_self\\_driving\\_cars.htm](http://www.naic.org/cipr_topics/topic_self_driving_cars.htm)

[http://www.huffingtonpost.com/zoe-williams-is-selfdriving-the-future\\_b\\_6415458.html](http://www.huffingtonpost.com/zoe-williams-is-selfdriving-the-future_b_6415458.html)

<http://www.cato.org/events/end-transit-beginning-new-mobility-policy-implications-self-driving-cars>

### **Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, “Cars and parking”, and “Growth management and sustainability” sections. Specific information about traffic can be found in Chapter 3.3, and the concept of phased zoning is addressed through the FEIS.

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**From: Katy Webber**

**Received: February 16, 2016**

To whom it may concern,

I live in Shoreline and I support the rezone to accommodate more housing and shops near light rail. I was glad to hear of the project, because it will lower the use of cars for commuting, since people will live near the rail, and there will be shops nearby too. I read that the council is reconsidering the scope of the plan, but I hope you put the most possible housing and shops near the rail line, it makes so much sense!

Thanks,  
Katy Webber

**Response:**

Comment noted.

**From: Marcia Furfiord**

**Received: February 16, 2015**

I declare that I want this to be part of the public record. I am for Alternative 1 - NO ACTION. I am totally against the rezoning proposals around the light rail stations in Shoreline.

I have been a Shoreline resident since 1977 and in my current house since 1988. My house is located on N. 150th Street, just east of Meridian. My yard backs to the undeveloped green belt of Twin Ponds Park. Our street has already had more than our share of construction noise and disruption. About 100 trees were cut down when the two Aegis buildings were constructed a few years ago on 1st NE and now the Evergreen school at 150th and Meridian is being added on to for the 5th time. Evergreen has cut down many more trees. Our street has a big impact from the traffic of Evergreen parents.

The noise level is getting worse and worse along with the traffic. There are not as many birds and small animals as there were. Right behind my house is the creek that runs in to Twin Ponds and we all love our park and want to protect it and our quality of life. This is not

the right place to have a "proposed bike trail". There are already sidewalks and bike trails on 5th NE and also on North 155th Street which connects to Aurora and the bridge to the interurban trail.

I have attended the planning commission hearings and agree with everyone else to SLOW DOWN and to also make sure that everyone knows about the proposed zoning changes. Save our neighborhoods, delay your decisions, save my equity, protect our environment and wetlands and keep the noise level down.

I have been a licensed real estate broker in Washington state for 26 years and believe that the proposed zoning changes in Alternative 2 & 3 will destroy Shoreline. Again, I am for Alternative 1 - NO ACTION

Thank you for listening,  
Marcia Furfiord and family

**Response:**

General substantive issues are discussed in more detail in the "Common themes of DEIS comments" section at the beginning of this chapter; specifically, in the "Request to delay decision-making" and "Growth management and sustainability" sections. Specific information about traffic, wetlands, and parks is included in Chapters 3.3, 3.4, and 3.5 of the FEIS.

**From: Buford Fearing**

**Received: February 17, 2015**

To whom it may concern

I am a resident on 9th AVE NE and have lived in the same house for 50 years. I feel you are moving to fast as many residents are just becoming aware of what might happen to their neighborhood's. you are not getting out much information to the neighborhoods that are affected

my house is my most valuable asset. I can assure you that if my neighborhood gets re-zoned I will never again vote yes on any levey, or anything else you put up for a vote, and I will work hard to see that none of you get re-elected. there are many reasons why we moved to Shoreline 50 years ago and it wasn't to become another Northgate or Lake city, I already have a friend that got a notice that she has to move out of her house as it is basically being confiscated and she has also lived their 50 years and doesn't know what she is going to do now I suggest you think very carefully about these plans as they affect many people

Sincerely,  
Buford Fearing

**Response:**

General substantive issues are discussed in more detail in the “Request to delay decision-making” and “Eminent Domain” sections at the beginning of this chapter.

**From: Ron and Ruth Prohaska****Received: February 18, 2015**

Dear Sir/Madam,

My name is Ruth Prohaska. I live with my husband Ron in a single family home located in the Ridgecrest neighborhood just north of NE 155th St., on 12th Ave. NE. I am writing today to comment on the Draft EIS for the 145th Street St. Station Sub-Area Plan, relative to the three proposed alternative plans.

We encourage you to consider only Alternative #3 - Compact Community.

Shoreline lacks a walkable town-center with pedestrian scale. The addition of a light rail station thankfully has the potential to improve the livability by realizing a walkable community with a town-center feel. Having sprawling up-zones, such as Alternative #2- Connecting Corridors at 145th and another at 15<sup>th</sup> doesn't realize the walkable town center idea. Alternative #3 - Compact Community zoning though would allow for more immediate density surrounding the station. Housing density, services, amenities, and mass transit utilization would be realized more quickly surrounding the station with Alternative #3. (I understand, MUR-85 is an expensive build and developers may balk at concrete and steel construction this far from Downtown Seattle or Green Lake. But switching MUR-65 into the Alternative #3 Compact Community plan would ameliorate this issue.)

The other reason we encourage you to consider Alternative #3 - Compact Community is neighborhood blight. It is a major concern for us in the Ridgecrest Neighborhood as the area is currently on the upswing. New homes are being built where blighted homes had been and homes are being remodeled on every block. A re-zone of Alternative #2 -Connecting Corridors sprawling into the neighborhoods ahead of housing needs will leave homeowners in single-family homes without pride of ownership as their properties would not be built to the highest and best use of the property. Although we hear that up- zoning will increase our property values, we know in fact that as the land

becomes a more valued property to rebuild, the structure remaining loses value negating any real increase in property value and leading to neglect of regular maintenance. Most of these properties are one-story homes. An up-zone of Alternative #2 Connecting Corridors could also lead to pockets of townhomes in the middle of single-story neighborhoods long before the need to spread out from the walkable town-center area surrounding the station adding to neighborhood blight. Alternative #2 needs to have a mitigating timeline before actually up-zoning into phase 2 otherwise the neighborhoods become a hodgepodge of uses for many years to come.

The DEIS mentions an unmitigated storm water increase of 11%-14% with some additional study of associated flood prone areas. Our neighborhood, in the Little Creek Basin (see attached map), frequently encounters flooded crawlspaces and backyard areas. On occasion we have seen water pouring out of the crawlspace vents. We have high water tables on the east side of 12th with a need for continuous required pumping in the wet season to keep our homes dry. Our neighborhood needs an upgrade just to sustain the properties at their current use. With commercial development on 15th Ave NE and high density development west of 10th Ave NE we question how storm water issues will effectively be resolved at existing areas as well as new ones.

Increased traffic congestion has not been addressed at any of the planning meetings that we've attended. Is there a traffic study being done for the current major intersections that will be effected? The anticipated back-up at NE 155th and 15th Ave will cause cars to bypass the wait and fly through the neighborhood streets. Light and sidewalks on these streets are nearly non-existent. Infrastructure in the neighborhood to accommodate future rezoning, such as widening roads, putting in sidewalks, lighting, etc. is a needed first step.

Currently Paramount Park is busy with skateboarders and children on playground equipment at all hours of the day with parking along NE155th Street. This park is at the crest of a hill that makes it nearly impossible for drivers to see the children crossing 155th at the crosswalk on 10th driving east on 155th. (See attached picture) Although there is one speed warning near 5th Ave for 30MPH, most cars during commuting hours which is also twilight much of the year are speeding. As 155th becomes a main route to the 145th St. station, we would like to see ticketing cameras and zoning lights similar to schools zones during twilight and commuting hours.

In summary, we are in favor of a concentrated subarea development. Alternernative #3- Compact Community. We feel that a compact plan, resources can be better focused to address the zoning, traffic, and stormwater pressures impacting the residents of Shoreline.

Thank you,

Ron and Ruth Prohaska

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to phase zoning” and “Cars and parking” sections. Specific information about traffic, parks, and stormwater is included in Chapters 3.3, 3.5, and 3.7 of the FEIS.

**From: Cory Secrist, PhD****Received: February 18, 2015**

Dear Council Members,

I am writing you as a plea to rethink how affordable housing and population growth is managed in Shoreline. The current plan includes a radical rezoning of the 145th and 185th subareas. There are severe consequences to such expansive development in our city that I believe will have long term negative effects that hurt the poor and middle class in ways that are not directly addressed in the current plans. I am serious enough about this that I would urge you to decline approval of the current mass rezoning plans for the 145th and 185th subarea stations. I know this is a drastic departure from the current stated plans, and I realize some rezoning will likely be necessary, but I believe it is important for the future of our city and its citizens that this be done in a different way. Please, allow me to explain why and how.

Our friends in the neighboring city of Seattle have been embarking on a bold experiment for the past few years to create a marriage between commercial developers and the affordable housing movement. They are now trying to bring Shoreline and the rest of King County along with them on this venture. The major strategies of this experiment are 1.) to allow micro-apartments (aka “aPodments”) to be built, 2.) to rezone huge areas of traditionally single-family neighborhoods so that they can be built over with apartments and businesses (particularly near light rail stations), and 3.) to incentivize developers to create affordable housing by offering up a 12 year tax exempt status for apartment complexes that maintain a certain percentage of affordable units. They have done this because Seattle rent prices have skyrocketed in recent years as Seattle has been an increasingly popular destination city, particularly among college students and young professionals. The basic economics of the affordable housing problem are that there is a higher demand for housing, with roughly the same limited supply, so apartment owners are raising rent prices to exploit demand, and developers want to increase supply by building and selling new units. On the surface, the developers sound like the good guys here who come in and supply the housing that people want at rates they can afford. But pay careful attention to their methods, for profit-driven developers and morally-driven affordable housing advocates make strange bedfellows. Throughout this letter I will address these three issues of micro-apartments, large-scale rezones, and property tax exemption incentives to explain why I believe these are not suitable solutions for affordable housing and create worse conditions for the poor and middle class.

### Micro-apartments

First, micro-apartments are changing what it means to be low-income. While the current DEIS for Shoreline states that micro-apartments will not be allowed in the proposed MUR rezones, these tiny rental units are important to mention here because of the role they play in the larger picture of how King County intends to manage its low-income population. Micro-apartments have been developed in Shoreline along Aurora Avenue, and it is important to keep in mind that Seattle also has many of them not far from here, as do other parts of King County. Whereas a studio apartment previously could be no smaller than 400 square feet, new laws allow micro-apartments that range from 120-350 square feet. This is smaller than the typical one-car garage. It is roughly the size of two prison cells put side by side. Low income individuals are being tightly packed into tiny rooms in giant buildings. Developers will claim that there is a high demand for these aPodments, but this is somewhat misleading. Shelter is a basic human need, so housing is always in high demand. The demand is actually for reasonable rent prices, and reasonably priced rent is decidedly in short supply. Most people on a low income would gladly choose a 700 square foot one bedroom apartment over a 200 square foot micro-apartment if they were offered for the same price. There are very few people actively looking to live in tiny spaces. It is simply the case that a cramped space is better than living on the street, so people settle for less than they deserve. Meanwhile, micro-apartments are not only profitable for developers and landlords, but they are surprisingly quite lucrative. They have more tenants (and therefore more rent checks) packed into a smaller total space. While a micro-apartment will be rented at a lower monthly fee (~\$500-\$900 per month) than a studio or one-bedroom apartment (thus making it “affordable”), micro-apartments are actually 2 to 3 times more expensive *per square foot* than the average one-bedroom apartment. Thus, landlords are renting their tiny spaces at a premium, even though the monthly rent total is lower. Tenants are asked to compromise more in terms of space than apartment owners are compromising in profits. In fact, apartment owners can increase profits by squeezing more people into smaller space and charging more rent per square foot. Many developers are even getting property tax exemption by providing these “affordable” units, because “affordable” is defined by the monthly rate of a unit rather than the monthly cost per square footage.

Meanwhile, marketing is done to make people feel happier about their tiny spaces by giving aPodment buildings pretentious names (Avenida, Videré, Terrazza, etc.) to make them seem fancy and by praising interior designers and tenants for making surprisingly efficient use of compact space while leaving smaller ecological footprints. While these praises are justified, they serve a similar function to working class myths about the value of hard labor, which also contain a kernel of truth, but have historically served as a way for the rich to convince the poor that there is value in working longer hours for less pay. Now the rich are convincing the poor to live in less space too. Those at the top have historically provided myths for those at the bottom to maintain their respective class positions and to perpetuate a view that their divided class roles are righteous and good for all, while simultaneously ignoring inequity and the hypocrisy of the elite. They sound noble at first blush, but they function to maintain class divide. The new vogue is to encourage people to use less space and resources. Whereas low income people are being shepherded into confined micro-apartment units, the middle class will be led out of the market for single-family homes and into apartments, and only the wealthy will be able to afford houses.

### Massive Rezoning

This brings me to my second major topic of radical rezoning and how it is changing what it means to be middle class. Neighborhoods that were previously designated as residential areas for single-family homes are being up-zoned to allow for mixed-use residential buildings. There is an expected trajectory that home values will make an upswing immediately following the rezoning, and then, as members of the neighborhood sell off properties to commercial developers and buildings go up, blight will drive down the value of later sellers' homes. In other words, it is a wiser decision (financially speaking) to sell in the early half of this process than in the latter half. However, as this is all happening, there is a decreasing supply of residentially zoned homes, because formerly residential areas will have been up-zoned to mix-use-residential. The cost of homes in residentially zoned areas can be expected to increase as a result of decreased supply. This means, that if you were in a rezoned area, even if your property value did increase with the rezoning, there is still the possibility of a zero-sum gain when trying to sell your home to buy another home in King County residential areas, since overall home values are likely to become increasingly costly. Instead, many low-middle to middle-class families who end up selling their homes will likely find they are unable to afford new homes and will instead need to move into apartments. In just a few decades time, it could very well be the case that more of the middle class will be living in apartments than in single-family homes, thus changing the very lifestyle expectation of what it means to be middle class in the coming decades. For those of us that are homeowners, the rezoning laws are the primary laws that protect us from having developers build large structures near our homes that block sunlight, increase fire hazards, lead to traffic congestion, and thin out available parking. Developers have a right to make a profit, but citizens also have a right to government protection from businesses trying to take advantage of the communities they are a part of.

Many of the informed homeowners in these neighborhoods are concerned, and for good reason. When their homes are rezoned to be included in mixed use residential zones, they will be sitting on what is akin to commercial property. This will likely increase the value of their land, but decrease the value of their actual homes, which are likely to be demolished for redevelopment. It is not clear whether or not this will work out in the seller's favor. From a property value standpoint, what this means is that if they decide to sell, they will most likely have to be selling to developers. Banks require a higher down payment for mortgages on commercial property, which residential home buyers are less likely to be able to afford. Developers can afford the higher down payment, but they are a smaller population of buyers and it can therefore take more time for the seller to sell a property. There is also an emotional toll here because to sell your home will mean that you also have to sell out your neighbors by contributing to the blight of the neighborhood when your former property leads to a giant new development over the top of where your house used to be. There is also the possibility of an added public expense of lawsuits filed against the city, as there is legal precedent for cases wherein citizens lost property value due to city rezonings that benefitted the public, but not the individual, and the judge's decision was that the city therefore owed compensation to the individual (see DeCook v. Rochester Intern and McShane v. City of Faribault).

The other point that needs to be addressed about the massive rezones is the assumption regarding their importance to the success of the Metro Light Rail. It makes sense to have some population density near public transit stations, but with such large scale rezoning, I fear we are creating more population density than the light rail and the existing roadways will be able sustain. To put it simply, there will be far more new people than there will be available seats on the train and lanes on the road. Also, part of why I and many other citizens wanted the light rail development was to aid in decreasing traffic and commute times. If the train stations also come with increased population density around them, then the population growth will add more to the existing traffic problems than the light rail will help. The problem gets even worse when you consider that these new apartment buildings have limited parking requirements, leaving residents with cars to park along curbs.

Additionally, Shoreline's pre-existing city design is not well suited for a large increase in population density. People live in Shoreline, and work outside of Shoreline. This city does not compare to a city like Amsterdam, which is often held up as a model of how population density can be successfully achieved. In Amsterdam, the predominant form of transportation has long been the bicycle. The roads are designed to accommodate bikes and pedestrians, and the city has ample public transit buses, trolleys, trains, and subways. Shoreline has very few bike lanes and sidewalks, limited ability to expand roads, and even with the coming light rail, this city cannot provide as many public transit options. Amsterdam has workplaces and shops nearby, so people don't have to commute long distances. Shoreline has traditionally been a city where residents live to commute to jobs outside of the city, and where residents frequently shop in businesses outside of the city. Shoreline simply is not designed to be a high-density city, and the mass rezoning is not going to suddenly change that. It will simply make it all the more apparent as the sudden influx of new developments and population growth strain the city's infrastructure (roadways, sidewalks, bike lanes, sewer lines, water mains, etc.).

If we give up all of this territory in Shoreline to rezoning now, then we have little power over what developers do in the future. The current plan of a massive rezone makes a big assumption that the invisible hand of market forces will guide urban development into something palatable for the city of Shoreline. I am not willing to put my faith in such magic. If any rezoning is to be done, it should be strategically phased in and done sensibly. The zoning should be contingent upon the completion of specific milestones such as utilities, storm water, and traffic improvements. For example, a large building should not be developed until it is clear that the water main leading up to it can provide adequate water pressure to reach the highest floors. That water line may start several blocks away, and it should not be the responsibility of the tax payers to upgrade the pipe width so that a new building can have the water it needs. We should ensure that developers are good stewards to the city that they are developing in.

#### Tax Incentives to Promote Affordable Housing

The current plan for bringing in affordable housing is to entice developers with property tax exemption for providing a portion of their apartments with "affordable" units. I put the word "affordable" in quotes because I do not believe that the actual definition of "affordable"

in the proposed legislation is a low enough rent cost, nor does it require enough units to warrant such a heavy tax break. According to the DEIS, in order for developers to achieve tax exempt status for 12 years, they must make apartments wherein 15% of the units would be rented out at rates affordable to people with an income that is 70% or below that of King County's annual median income (AMI; though do note that this is not Shoreline's AMI). The annual median income for King County is \$66,476, so that 70% line would mean that they are providing affordable housing to people making \$46,533 or less. This is not typically the annual income people think of when they think of people in need of affordable housing. This is not low-income housing; it is lower-middle class housing. To help put a face to this, the affordable housing units might be affordable to some teachers and nurses, but not for people working in retail, food services, child care, nor emergency medical technicians. Given that the definition of "affordable" is that an individual spends no more than 30% of one's annual household income on rent, this means that the monthly rent would be \$1,279 per month or less. This is hardly any different from what rent rates are now. The median rent in Shoreline is currently \$1,487. As an analogous approximation of the 70% AMI, 70% of that average rent would equal \$1,041. In my estimation, this would mean that rent could actually go up in price, even within the "affordable" units. This plan to incentivize developers really adds nothing to the available affordable housing. It only helps stave off a projected increase in rent prices. This benefits the apartment owners and developers, not the poor.

Earmarking 15% of the units for affordable rates is too a low figure, and 70% AMI is not affordable enough. The earmarked 15% of units should be helping Shoreline's lowest 15% of income earners, but 13.9% of people in Shoreline fall in the Low to Very Low income range, who will remain unable to afford housing and will be unaffected by this supposed increase in "affordable housing" from tax incentivizing. The bottom line is that these plans appear carefully crafted to slide through political process under the banner of affordable housing, while actually helping make developers a lot of money and exempting themselves from paying property tax, thereby hoisting the burden of generating new tax revenue onto the surrounding home owners who will receive no such tax break. I am afraid we are being hoodwinked by a bit of business slight-at-hand. I am in favor of affordable housing, but I do not believe the current tax incentive plan provides it, and if this is a mistake to offer these incentives, it is a mistake that lasts for 12 years.

Thank you for hearing my concerns. In summary, I believe micro-apartments and massive rezones will respectively change what it means to be low-income and middle class in Shoreline over the coming decades. I do not believe Shoreline's existing design and infrastructure can adequately accommodate a large increase in density without better accommodations for transportation and utilities. If there is to be rezoning, I believe it should be phased-in, contingent upon meeting these accommodations before development can take place. I am concerned that rezoning residential neighborhoods will take away important protections from our current Shoreline residents. I do not believe that the current property tax exemption incentives will adequately lead to affordable housing. Please reconsider the plans for a massive rezoning of Shoreline, as well as proposed property tax exemptions for developers.

Respectfully, Cory Secrist, PhD

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to phase zoning”, “Affordable housing”, “Cars and parking”, and “Growth management and sustainability” sections. You note that microapartments are not an allowed use in the light rail station subareas and it is also worth noting that the Property Tax Exemption would need to be extended to this area in order for developers to utilize the provision. MUR zoning does require development of a percentage of affordable units, which is an effective tool to incorporate affordability into market rate housing, but the City will also work with partners, including non-profit housing developers, to promote deeper levels of affordability. Specific information about affordable housing is included in Chapter 3.2 of the FEIS.

**From: Parkwood Neighborhood Association c/o Chris Brummer**

**Received: February 18, 2015**

Dear Mr. Szafran,

As stated in previous letters to the City, the Parkwood Neighborhood Association (PNA) fully supports and welcomes the arrival of light rail and the many opportunities for growth and improvements it will bring to our neighborhood and to the City of Shoreline. In previous letters from the PNA to the City, we shared our vision for Parkwood and the many improvements that we would like to see incorporated into development standards for the station subarea. In this letter, we focus our comments on the high-level issues that could result in significant changes to the character of our neighborhood and offer suggestions for how to reduce those impacts with tighter City control over rezoning that will still allow for increased density to meet the growing needs for new housing and services in the station subarea.

We support incremental increases in density in our neighborhood driven by regional population growth and the desire of future residents to live near the light rail station. This approach is more consistent with the recommendations in the City’s market analysis. The market analysis recommended a scale of development that is more economical in the near term, can create a strong sense of place, and that can “prove” the viability of the station area market and set the stage for higher density development in the future, if desired. We are therefore questioning the need for immediate rezoning of the entire subarea for development that may not occur for many generations, and instead would like to see the zoning occur in phases.

***In short, we feel strongly that rezoning needs to occur in phases, and that each new phase be triggered when the preceding phase has succeeded without adverse impacts to the City's infrastructure and the environment.***

We have heard from many of our neighbors that they strongly favor such a plan to phase in rezoning in the subarea to 1) first maximize the potential for Transit oriented development (TOD) proximal to the station while minimizing neighborhood impacts, and 2) to avoid spotty development that would impact many more adjacent single-family residences throughout the neighborhood for generations to come until full build-out is achieved.

Subsequent phases of rezoning (we suggest three or four) could proceed when previous phases are on track for build-out, market demand for new development in the subarea can be demonstrated, and funding has been secured for the necessary infrastructure improvements (e.g., sidewalks, traffic safety improvements, a new pedestrian bridge over I-5, improvements to Twin Ponds Park, sound barriers along I-5, and storm water improvements to Thornton Creek, which is at capacity now and floods Twin Ponds Park several times each winter). This would also allow impacts to our neighborhood's infrastructure and natural environment to be mitigated concurrently with development.

It is important that as the area changes, particular attention be given to improving the health of Thornton Creek and the parks in the subarea that are essential links within the Thornton Creek ecosystem. In Parkwood, Thornton Creek flows through a series of culverts and ditches before entering Twin Ponds Park and recharging its surrounding wetlands. The health of our parks is important not simply for the value of providing open space for residents, but because what happens in Shoreline, the headwaters of Thornton Creek, can affect the health of the entire downstream length of Thornton Creek, which as you know, is the largest watershed in the Seattle metropolitan area.

Although we applaud the City for its recent consideration of a phased approach to rezoning, we propose that the boundaries for the first phase be drawn in closer and limited to within three blocks of the station and also include existing commercial areas. We feel that this phased approach would supply enough units to meet the market demand for several decades, while confining the short-term impacts to a smaller area near the station and preserving the character of our neighborhood that we cherish. For instance, the City's market analysis for the subarea projected a demand of 500-800 additional dwellings through 2035. This is consistent with the number of new dwellings in the subarea we calculate using the City's assumed annual population growth rates of 1.5% to 2.5% and our assumed baseline of 1150 dwellings within the station subarea. In our letter to the City dated September 29, 2014, we showed how a modest level of rezoning in only a portion of the Parkwood half of the subarea could provide more than 1200 additional dwellings, which would meet the demand for additional units for the next 30 to 50 years after construction of the light rail station.

In addition to sharing these thoughts on phasing, we also make the following observations on traffic impacts, population and housing density, and development outside the subarea:

**Traffic Impacts:**

The DEIS states that traffic would increase under all alternatives but downplays the potential increases in traffic that would result from the higher density with the action alternatives by assuming more people would make use of local transit (busses) than would occur under the no-action alternative. We feel it is more likely that higher density under the action alternative will result in more cars on neighborhood streets because most people will continue to own cars and drive them around town for shopping and short errands. We think this should be considered in the City's traffic analysis so that the Final EIS reflects the impacts to traffic that are more likely to occur in our neighborhood.

**Population and Housing Density:**

The average density of 3.2 dwellings per acre in the subarea (zoned mostly R-6) reported on page 2-6 is misleading in that it infers that the development potential of the subarea under Alternative 1 is underleveraged, at only slightly more than half of the full build-out potential of 6 dwellings per acre. It appears that the density was calculated using the acreage of the entire subarea (approximately 1150 dwellings in roughly 360 acres), which includes parks, schools, churches, commercial properties, city streets, and the I-5 right of way. Because most of the single-family residential lots (R-6) are actually only about 1/5 of an acre, the average density of developable land (which should exclude parks, schools, churches, commercial properties, city streets, and highways) is more like 5 dwellings per acre (and perhaps higher after considering the small number of multi-family units in the subarea) – much closer to the currently zoned, maximum-allowed density of 6 dwellings per acre. We had to estimate the number of dwellings in the subarea and the acreage of the subarea ourselves because they were not reported anywhere in the DEIS.

What this means is that the subarea is nearly at full build-out now, and there is insufficient space for the additional 1,133 households projected to be added over the next 20 years under current zoning, even if all of the churches and commercial properties were developed for residential use and a handful of the available larger lots (mostly east of the station) were split and developed. This is relevant because exaggerating future growth under the no-action alternative lessens the relative impacts of the action alternatives evaluated in the DEIS.

Further complicating the matter is the fact that the population, number of households, and employees listed in Tables 2-2, 2-3, and 2-4 for the roughly 360 acre (our estimate) "subarea" were actually tabulated for the combined Traffic Analysis Zones (TAZs) shown in figure 2.1, an area roughly three times the size of the station subarea. We ask that the final EIS calculate the existing density (dwellings per acre) using the area of buildable land in the station subarea where the rezoning is proposed and that a consistent definition of "subarea" be used throughout the document to avoid confusion. We also ask that the City justify how the existing zoning in the station subarea could accommodate a doubling of the number of households in the next 20 years.

**Development outside of the Subarea:**

The potential for new development in the subarea and the assumptions for the quantity of new units that light rail would support in the subarea seem inflated because they do not consider mixed-use development that is already occurring within one mile of the proposed station (e.g., Malmo on N 152nd Street off of Aurora, Aurora Square, and Tressa on Linden Avenue N at N 143rd Street. It seems more practical to encourage development in these areas (and more likely for it to occur there first) because they are currently vacant and/or already zoned for high density – and it would potentially delay the unnecessary displacement of hundreds of single-family homes in the neighborhoods surrounding the station.

We feel that the action alternatives should be considered bookends for full build-out in order to evaluate the greatest degree of impacts in the DEIS and should not be adopted as the Planned Action Ordinance for rezoning without carefully examining a phased approach to rezoning within the subarea. We believe the adopted plan needs to be consistent with the phased rezoning implied by the market analysis and that it is a plan that current residents see as achievable. We encourage both the Planning Commission and the City Council to adopt carefully planned phases that can be monitored to ensure their success.

Lastly, we want to say that we very much appreciate the work done by the Planning Commission, the City Council, and the City staff. We also appreciate this opportunity to provide input. We are confident that by working together we can ensure that the rezoning will serve to improve the quality of life in not just our neighborhood, but in the entire City of Shoreline.

Sincerely,

Parkwood Neighborhood Association Board Members:

Chris Brummer

Katie Schielke (Chair)

Michelle Morgan

Yoshiko Saheki

Robin Lombard

Jennifer Cohen

Mara Calhoun

Stephanie Watanabe

John Featherstone

Chris Goodman

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Request to phase zoning” and “Cars and parking” sections. Additional information about housing and traffic is included in Chapters 3.2 and 3.3 of the FEIS. The City appreciates the work of the Parkwood Neighborhood Association.

**From: Jan Helde****Received: February 19, 2015**

Planning Commission:

I do not know how much latitude you have in making changes to the three proposed alternative maps, but I will ask you to consider the neighborhood, consider the existing infrastructure, and compare the likelihood of the city planners artist rendering of what could be to what is more likely to be the end result.

1) You have in the **compact plan MUR 85 or 7 + story buildings**, or in the **connecting plan MUR 65 or 5+ story buildings** being built next to light rail.

Pro – you can get the 700 new units that some say Sound Transit wants near the station and thereby maybe getting more money for Shoreline for further development.

Con - the majority of the public is against both of these proposals –

Con - buildings with this large of foot-print will need a lot of single family lots to build and that may take years for a contractor to obtain –

Con – 5<sup>th</sup> Avenue will become a major thoroughfare causing overflow onto 7<sup>th</sup> and 8<sup>th</sup> which are even less equipped for more traffic.

Con – 145<sup>th</sup> is still a big question and until that is figured out, just planning the light rail is going to cause a huge bottleneck.

Comment – as of right now, buildings that are 5 story are found on 15<sup>th</sup> and Aurora, buildings that are 7 story are only found on Aurora.

Buildings this large are meant for cities, not Ridgecrest which is a single family neighborhood.

Compromise - rezone this area to MUR 45 or 4 story buildings. The foot-print is considerably smaller and would take less time to obtain enough land to build, this size would blend more with the neighborhood, there would not be as much increase the traffic as with a 7 story building.

Comment – I understand that in an area zoned for MUR 85 or MUR 65 does not mean that a 7 or 5+ story building has to be built there, but even the idea of something that tall being “allowed” to be built has a negative impact on the public. So why not downsize to something that can be more easily tolerated by the public and has a better chance of being built within the next 10 – 20 years.

2) You have in the **compact plan you have MUR 85** or in the **connecting plan MUR 45** building planned for 8<sup>th</sup> Avenue.

Pro – sorry I cannot think of any.

Con – same as above, as well as the high voltage lines that are located on both side of 8<sup>th</sup> Avenue. The lowest wire is about 50 feet, with the highest wire about 75 feet. I am not a builder, but to me, it would seem unlikely that a developer would want to construct a building around high voltage lines.

Con – 8<sup>th</sup> is a 25 mph street and with more traffic, the speed will only go up with the increase in traffic. This is also next to a park where a lot of kids play and walk to. Do you really want to increase the speed around that?

Comments – Your current maps show trees and sidewalks on 8<sup>th</sup>. When we asked for speed bumps or round-abouts to slow traffic, we got nothing.

Compromise – make 7<sup>th</sup> and 8<sup>th</sup> avenue part of the second phase which takes place in 2034 and only have it increased to MUR 35. If your first phase is a success, then the 2035 city council can look into changing the zoning.

Please consider scaling down your maximum zoning, reduce the overall foot print for the first phase, and make this redevelopment of the neighborhood something that will blend and not be an eyesore. The photos that have been circulating of 7 story buildings show the surrounding area as a developed city, not a neighborhood. Look at 5<sup>th</sup> Avenue in Maple Leaf, they have several story buildings with small business owners (art store, dog grooming, restaurant) on the lower levels and residence above, with residential streets on either side of 5<sup>th</sup>. With smaller buildings and slower growth you may win over more of the public, but still provide the structure for increased density, and increase the likelihood of actual construction, as well as provide increase ridership for Sound Transit.

Thank you for your time and your consideration.

Jan Helde  
Ridgecrest

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors that influenced potential zoning scenarios” and “Request to phase zoning” sections. The potential to phase zoning is discussed throughout the FEIS.

**From: Sarah Jaynes**

**Received: February 19, 2015**

In my February 12<sup>th</sup> comments that I send to the Shoreline City Council I wrote, “I resent the generalizing done of large demographics of the population. I am a Millennial. I am an older Millennial in her thirties. When I was younger I did live in Seattle and did enjoy an urban lifestyle. When my husband and I started a family though we had different lifestyle needs and chose to move to the suburbs for the amenities Shoreline could provide. In fact, all the millennials I know have bought single family detached homes when they started their families. We aren’t descendants of the Rockefellers either but middle class America. I hope that when you generalize what Millennials like that you control for Millennials without families and those with. Suburbs were created and became popular for a reason. The reason why people chose them HISTORICALLY are still the same reasons people are choosing them today. Don’t millennials deserve the same good schools, yards and safe and peaceful neighborhoods as previous generations have/had?”

Well it appears my personal experience may also be the reality for the majority of Millennials. A study was brought to my attention done by the National Association of Home Builders with the following excerpt, “A whopping 75 percent of this generation wants to live in single-family homes, and 66 percent of them prefer to live in the suburbs. Only 10 percent say they want to stay in the central city. Compared to older generations, millennials are more likely to want to live downtown, but it’s still a small minority share.” You can read the study yourself at [http://www.nahb.org/news\\_details.aspx?newsID=17094](http://www.nahb.org/news_details.aspx?newsID=17094).

This caught my attention so I spent five minutes on Google I used the search term “where do Millennials want to live when they start a family” and found some other articles/research.

Maybe you’ve heard of the Wall Street Journal? It quoted the same survey from the NAHB that 66% of Millennials want to live in the Suburbs.

<http://www.wsj.com/articles/millennials-prefer-single-family-homes-in-the-suburbs-1421896797>

Please check out the following links also.

<http://www.demandinstitute.org/sites/default/files/blog-uploads/millennials-and-their-homes-final.pdf>

<http://www.theatlantic.com/business/archive/2015/01/young-americans-yearning-for-the-suburbs-stuck-in-the-city/384752/>

<http://www.baconsrebellion.com/2014/09/millennials-want-a-new-kind-of-suburbia.html>

[http://www.phillymag.com/citifed/2015/01/28/millennials-actually-love-cities-just-broke-](http://www.phillymag.com/citifed/2015/01/28/millennials-actually-love-cities-just-broke-leave/)

[leave/http://www.redfin.com/research/reports/special-reports/2014/where-do-college-educated-millennials-live.html](http://www.redfin.com/research/reports/special-reports/2014/where-do-college-educated-millennials-live.html)

These were literally just my first few search results. Maybe you should spend five minutes on Google also and do some of your own research. Lots of the data out there is contrary to what you have been relying on when making your massive rezoning plans.

Thank you.

Sincerely,

Sarah Jaynes

Very Concerned Citizen of City of Shoreline and Registered Voter

**Response:**

The City acknowledges that the decision to start a family influences people's housing preference, and that while many younger Millennials tend to prefer urban settings and amenities, many will also be drawn to Shoreline because of the city's schools, parks, and light rail stations. Another factor that influences housing choice is affordability. Light rail stations will increase demand for housing and if the supply remains the same because zoning does not allow styles other than single-family detached, basic economic principles dictate that prices will rise, likely to a level that many Millennials and others will be unable to afford. Allowing for a variety of housing choices within the subareas will hopefully create styles that are appealing and affordable to a variety of households of all generations. Housing is discussed in greater detail in Chapter 3.2 of the FEIS.

**From: Jason and Quiana Hennigan**

**Received: February 19, 2015**

We encourage the Planning Commission to slow down their process on the redevelopment of the 145th Street area, and better consider how the proposed changes will affect current residents, not hypothetical possible future residents of the area. We urge the Planning Commission to come up with concrete proposals to directly address the concerns expressed by the current residents.

The entire City process around the 145th Street Light Rail Station has been too rushed and has not taken into account residents' concerns. When the "Compact Community" map consists of massive swaths of 85' height buildings, it's clear that current residents are not a concern of the planners.

I would ask the planners, how would you feel about 85 foot tall buildings blocking out the sun at your house? These massive upzones are rushed and a bad idea. Residents of Ridgecrest are for Light Rail and pro-development, but trying to force a zoning plan for what you hope the area might look like in 30 years is poor policy and bad for the people most impacted, the folks living in the area.

If there is to be any upzoning in the 145th area, it should be phased in, and it should not happen before the City has an appropriate plan for traffic and utilities in the area. Traffic is already a safety issue in the 145th Street Station Subarea; changing zoning to encourage additional development without a solution to even our current traffic and pedestrian issues is dangerous and short-sighted.

Suggesting that traffic will go down this street or that does not address the specifics of how the city will manage traffic. There is no concrete proposal on how to improve safety or increase capacity on the roads within the subarea. In addition, 155th street is a residential street, not a connecting corridor. It is being treated in these plans as though it should be a massive thoroughfare, when in reality, 155th is a residential street lined by: single family houses, two parks, a school, and churches. Traffic should be moved off of 155th, to 145th and 175th, the actual Connecting Corridors in the area.

I encourage the planners to spend some time at Paramount School Park, and note how pedestrians have trouble crossing the road to get to the park because drivers are going too fast and don't want to stop for them. Or try to cross 10th Ave on a weekday morning at 155th, and see how often pedestrians are close to getting hit there because the drivers aren't paying attention to them as they shortcut between the Connecting Corridors of 145th and 175th via 10th Ave.

Current residents are most concerned about traffic, pedestrian safety, environment/green spaces and building height. Before rezoning occurs, the Planning Commission needs to address citizen concerns with plans that directly address how the city plans to deal with these issues using concrete examples of specifically what action will be taken. Proposals including potential schematics for road expansions, smarter traffic lights, or improved utility lines should be provided for the City, Planning Committee, City Council, and citizens before ambitious large-scale rezoning occurs. Without some concept of how to directly and literally resolve or mitigate with these areas of concern, there cannot be a reasonable decision made on rezoning. Please slow down your process to allow for informed and thoughtful decision making.

Jason and Quiana Hennigan

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors that influenced potential zoning scenarios”, “Why plan/zone now”, “Request to delay decision-making”,

“Request to phase zoning”, “Cars and parking”, and “Growth management and sustainability” sections. Additional information regarding traffic and parks is included in Chapters 3.3 and 3.5 of the FEIS.

**From: Ruth Williams, President, Thornton Creek Alliance**

**Received: February 19, 2015**

Dear Mr. Szafran:

TCA supports non-automotive modes of travel and Sound Transit plans in particular as a way of mitigating pollution and the environmental damage that goes with urban sprawl. We applaud the City of Shoreline’s work in cooperating with Sound Transit.

Unfortunately each of the up-zone scenarios is deficient in open space designations or even a clear statement of acquisition mechanisms and goals. Without greater specificity, the city staff reassurances that expected increases in runoff will be mitigated in the development phase, ring hollow. We understand this was done to avoid further alarming the affected communities by the likelihood of additional rezoning and eminent domain actions, but it makes it difficult for us to offer specific suggestions. We hope you will give consideration to our broad-stroke recommendations as well as the specific ones which we have stated here.

- When planning for the additional open space commensurate with projected increased density, please try as much as possible to construct greenspaces that can serve as areas for tree replacement and accommodate all or most of the stormwater control. Any and all Environmentally Critical Areas and FEMA identified liquefaction zones can be used for these purposes. Greenspaces serve not only inexpensive eco-functions, they also create habitat and places for community enjoyment.
- Trees are very beneficial in controlling stormwater, cleaning the air, and providing respite from the city hardscape, yet many of them will be removed in the process of light rail construction and accommodating the residential up-zones. Please replace trees at a three to one ratio.
- Low Impact Development should be the iron-clad rule for all new construction. Permeable paving, rain gardens, LEED construction methods, and green roofs on certain categories of buildings should become routine practices in order to compensate for the significant increase in run-off that will occur.

- In protecting Thornton and Littles Creeks, for the sake of filtration and habitat development, it is important to provide natural area buffers and transitional zoning that will develop and preserve the hyporheic zones of these waterways. The area south of Paramount Park would be an ideal site to construct a Green Grid Trail as well. A new box culvert in Paramount Park at the site of the pedestrian bridge over Littles Creek would be a great help.
- Please enhance and provide transitional zoning for the existing greenspaces and natural areas at Twin Ponds, Paramount Park, Littles Creek, and the 152<sup>nd</sup> St. Wetland. Additionally, the wetlands east and north of Twin Ponds Park must have their buffer zones respected as defined in the City of Shoreline Municipal Code. Please rebuild the hyporheic infrastructures, replant, and increase the size of these places in order to create larger contiguous natural areas.

TCA requests legal standing as a party of record and would appreciate being added to your list for notices. Thank you very much for your consideration.

Sincerely,

Ruth Williams, President  
Thornton Creek Alliance

**Response:**

Many of the topics you address are covered by existing code language, either through the City's stormwater or Critical Areas regulations. Existing policies and regulations of the City of Shoreline and State of Washington, as well as those of the federal government protect wetlands, streams, and high priority habitat areas such as Twin Ponds Park and Paramount Open Space. Site development regulations administered through the City, which apply Washington State DOE stormwater requirements, strictly mandate practices to protect water quality and reduce flooding. Development projects must utilize Low Impact Development techniques unless they are proven infeasible. The City's Critical Areas Ordinance protects fish and wildlife habitat, wetlands, and their buffer areas. Trees in critical areas and their buffers are regulated as "protected trees" regardless of zoning.

**From: Sigrid Strom**

**Received: February 19, 2015**

Members of the Planning Commission:

First, please let's be clear that no one fails to see the need for accommodating increased density over time in the City of Shoreline. The issue is how much and when and how to incorporate it.

Let's also be clear that there is an economic incentive here for many involved parties who wish to use any projected increase in density as a means of increasing economic returns to the City itself and to various types of investors. The issue in any scenario that the City or others might envision is how projected short-term gains compare to projected long-term gains, taking into account a variety of factors that include but are not limited to: how much and over what period of time is there economic gain and to whom is any economic gain going, what are the increases in costs for City services relative to any gains to the City over the long run, how many jobs do we want to generate within the city relative to the size of the population, do we want to generate livable wage jobs or minimum wage jobs, and do we want revenues from commercial enterprises to stay within the city and region or to be funneled out of the city to national franchises or corporations. These are just some of the strictly economic factors to consider. I point these out specifically because of the overwhelming emphasis in this and other City plans on mixed-use development, which seems to be viewed as a panacea for accomplishing economic growth. It isn't. It's a developer-driven growth model that requires huge increases in residential population to support its associated retail commercial development.

Potential economic gain, not the need for increased density, is the driver for the City's effort to adopt one of the planned action alternatives proposed in the 145<sup>th</sup> Street Light Rail Station Subarea Plan DEIS. However, there are other ways to achieve economic growth and accommodate necessary increases in residential density that can also address constructively the desire of subarea residents for a balance of economic development with social equity and environmental sustainability. The City would have residents believe that we can only have economic growth and amenities like community gathering places, walkable neighborhoods, local neighborhood businesses, and so forth with development plans like the ones currently under consideration. With all due respect, that's just plain ridiculous.

It's a gross overstatement for the City to say that people aren't happy with the alternatives presented in the draft EIS because "they are afraid of change." How demeaning and disrespectful that attitude is. And how easy it is to dismiss opposing ideas when the people who are expressing the ideas can be dismissed in this way. How people respond to change depends in large part on whether their concerns, needs, and values are being addressed.

What is very troubling in general is often a lack of actual data or inadequate data to support proposed elements of the plans (for example, inadequate financial data, assessments of economic scenarios that are too narrowly focused, inadequate data with respect to surface or groundwater conditions, questionable data with respect to likely population growth over the time frame encompassed by the plan, as yet unavailable data with respect to solutions for revamping the N.E. 145<sup>th</sup> Street corridor, and so forth).

Also troubling is the frequent use of certain terms or buzz words with no real definition of what they mean in terms of planning:

**walkability** (Does its use in planning discussions or documents reflect the actual needs of the population with respect to getting from home to jobs outside city or to jobs within the city or to recreational and social venues or to retail outlets anywhere in the city or to local neighborhood businesses?)

**mobility** (Does its use in planning discussions or documents reflect the actual needs of people to get around within the city itself, or to the need to just get somewhere else outside the city? Does its use here reflect a diversity of options, not just bus and light rail mass transit and bicycles?)

**low income** (Income below what level? Does its use in planning discussions or documents reflect the diversity of lower-income populations in terms of their housing needs and wants?)

**senior housing** (Which looks like what? Does its use in planning discussions or documents reflect the diversity of senior populations in terms of their housing wants and needs?)

**family housing** (Does its use in planning discussions or documents reflect the diverse needs and wants of families or the actual research and studies that talk about environments that support healthy families and healthy social communities? Are the needs of actual families being considered, or are we just stuffing people into a building and maybe placing a jungle gym somewhere on the property?)

**multi-unit residential buildings** (Who are we thinking are going to live in these units or are going to want to live there? Does its use in planning discussions or documents reflect the diversity of needs and wants in the general population? Is this type of housing viewed as long-term or “permanent” housing for residents or as transition housing for particular population groups?)

**younger people** (Which are who? Does its use in planning discussions or documents reflect the diversity of this population?)

In addition, it's disturbing that both the intent and context of the earlier Southeast Neighborhoods Subarea Plan have been almost completely ignored in developing the current alternative scenarios. The subarea's Citizen Advisory Committee (CAC) had determined the purpose of the subarea plan to be the following:

"To identify valued quality of life characteristics of the S.E. Subarea, to identify existing problems or issues that require attention from the City, to identify what level of increase in residential and business density is reasonable and desirable in the subarea over the next 20 years, and to identify means of *accomplishing changes in density with maximum benefit to and minimum harm to the existing quality of life.*"

The thrust of the CAC focus was on neighborhood characteristics identified as being ones that members of the CAC and neighborhood residents valued and wished to preserve, such as the following:

Retention of a unique neighborhood identity

A solid and thriving social fabric of social networks

Diversity that is expressed in the resident demographics of the area, in the available housing, and in the available recreational and social opportunities

Attractive, *livable*, flexible housing

A balance of environmental sustainability with social equity and economic development

Small-scale retail and personal service uses in designated areas to accommodate the everyday needs of nearby residents

Parks and open spaces

The current alternatives presented in the 145<sup>th</sup> Street Light Rail Station Subarea Plan DEIS fail in almost all regards with respect to addressing underlying planning issues (such as unanswered questions with respect to various options for stimulating economic growth, creating social capital, balancing environmental sustainability with economic development, creating innovative modes of transportation within and from and to the city). The City has failed to adequately address and present the total impact of all currently proposed upzoning in various city neighborhoods, the cumulative impact of the 145<sup>th</sup> and 185<sup>th</sup> plans on the city as whole and on neighborhoods between the two subareas, and failed to address the impact on adjacent Seattle neighborhoods and other adjacent communities such as Lake Forest Park.

The rush to upzone without any clearly substantiated need for doing so at this point in time is without merit, especially without the use of criteria for phasing in greater density and without input from both the Final Light Rail 145<sup>th</sup> Street Transit Center Station EIS and the final recommendations from current discussions among the major government entities with respect to the N.E. 145<sup>th</sup> Street corridor.

I support voting down both proposed rezoning alternatives in the 145<sup>th</sup> Street Light Rail Station Subarea Plan DEIS. The combined impacts of the proposals for N.E. 145<sup>th</sup> Street and for N.E. 185<sup>th</sup> Street are so massive that it might be advisable to let the entire community weigh in on the subject. The impacts will be citywide, that is certain.

Respectfully submitted,  
Sigrid Strom, Shoreline resident  
Former member of Southeast Neighborhoods Subarea Plan CAC

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Why plan/zone now”, “Request to delay decision-making”, and “Growth management and sustainability” sections.

With regard to your question about definitions, “multi-family”, “low-income”, and “walkability” are defined in the Glossary in the Appendix of this FEIS; “family”, “mobility”, and “younger persons” are not, but all are discussed throughout the FEIS.

**From: 145<sup>th</sup> Street Station Citizens Committee****Received: February 19, 2015**

Members of the Shoreline Planning Commission,

On many occasions over the past 18 months the members of the 145<sup>th</sup> Station Citizens Committee have been asked to provide input on the plans for the 145<sup>th</sup> subarea plan. This letter presents feedback from the members, many of whom have been participating since the group was formed in August, 2013.

In two design workshops, and in the months before and after, we acknowledged the need for greater density and low-income housing and came up with pictures and design elements for 3-story buildings as well as parks, trails and other amenities. Some of the members of the committee put a lot of energy into this process. So we were surprised (and some were angry) when the proposal for the subarea plan came back with eight-story buildings. We residents were thinking about the near term (the first 20 years or so) but it turned out that hasn't been the focus of the City's planning process. Those of us who live here now have several concerns related to near-term impacts that we'd like to put on the record.

First, many of us are uncomfortable with what we feel is a “rush” to upzone the entire area. We understand that we need to plan for greater density, but not the need to upzone a large swath of the neighborhood this year to a density it is not expected to reach for 60 – 100

years. As one neighbor put it, “Why are we on this timeline and what are the consequences of not meeting this timeline?” Yes, we need to have a plan on the books for grant funding, but do those funding decisions hinge on large zoning changes being in force by June 2015?

The proposed zoning changes are larger than any of us expected. It has been explained that the “full build-out” won’t be seen for 60 – 100 years. In that case, we would favor a plan that gradually phases in zoning over those years for full build out. Also, we believe that phasing in zoning changes should be tied to specific milestones such as utility, storm water and traffic improvements. We also feel a smaller first step in rezoning would be in line with the market analysis that was done for the subarea plan.

Another aspect of the DEIS that many of us are concerned about is the plan for 145<sup>th</sup> Street itself. Note that the DEIS did not address traffic along 145<sup>th</sup>, but instead deferred to the Route Development Plan, which isn’t finished yet. The city staff have communicated to us that one project will inform the other, and maybe that is the best case that can be achieved in this situation. However, we don’t think it makes sense to rezone anything along 145<sup>th</sup> street until both plans are synchronized. How will the livability of communities be defended during a potentially longer development period of two separate projects (updating of 145<sup>th</sup> and building construction in a rezoned area)?

In addition, we would like to see the development focused, at least initially, as suggested in several letters to the planning commission. We have seen the newly proposed Map E, but feel it extends MUR-85 too far from the station. We have today a living example of how MUR-85 zoning might impact existing residents. The Polaris at 185<sup>th</sup> and 12<sup>th</sup> has impacted neighbors in terms of both parking and unwanted lighting. We feel that at least initially, MUR-65 or MUR-45 would be more appropriate.

Lastly, we would like to see single family homes as a permitted use in all upzoned areas. It’s unclear exactly what will happen to single-family homes in the different upzoned neighborhoods in terms of value and salability – no one can say for sure. This is a special concern for many neighbors who plan to continue to live in their homes after the light rail arrives. We feel that allowing single family as a permitted use provides more options to the current homeowner than not allowing it.

As a result of all the above issues, we would like to request a delay of any recommendations from the Planning Commission to the City Council until at least April, when the Sound Transit FEIS comes out. We believe it will be important to know – for us as well as the Planning Commission, City Staff, and the City Council to know – what Sound Transit requires or will pay for before any action is taken regarding zoning around the station.

The members of this committee want to live in a vibrant community. We want the plans for the 145<sup>th</sup> sub area to reflect residents’ desire for gradual change and appreciate that you represent our interests in matters of City planning. We are participating on this committee so

that we can provide a neighborhood voice to guide and support you in your decision-making. Thank you for taking the time to listen to what we think is best for the future of our neighborhood.

Respectfully,  
Robin Lombard  
For the 145<sup>th</sup> Station Citizens Committee

**Response:**

General substantive issues are discussed in more detail in the “Common themes of DEIS comments” section at the beginning of this chapter; specifically, in the “Factors that influenced potential zoning scenarios”, “Why plan/zone now”, “Request to delay decision-making”, “Request to phase zoning”, and “Cars and parking” sections. Some of the concerns you and the committee raised were addressed through Council’s decision to take a break in subarea planning until completion of the 145<sup>th</sup> Street Corridor Study and their direction to analyze a fourth alternative and a phased approach to zoning in this FEIS. The City appreciates the work of the 145<sup>th</sup> Station Citizen Committee.

***April 7, 2016 Written Comments on DEIS Zoning Alternatives*****From: Cynthia Knox****Received: April 7, 2016**

Parks preserve critical wildlife habitat. As our nation develops and our rural, agricultural and forest landscape is being lost, open space and wildlife habitats are disappearing at an alarming rate. The connected network of local, regional, state and national parks across our country provide permanently protected wildlife habitat corridors for thousands of indigenous and migratory wildlife species. In addition, stream valley parks and community parks allow natural wildlife to coexist with people while providing enjoyment and educational opportunity for children and families.

More importantly, parks and public lands also provide groundwater recharge areas, FLOODPLAIN protection, natural sound barriers, storm water protection from wetlands, reductions in heat island effects, and carbon uptake from abundant trees and vegetation. Parks keep our living environment healthy.

Paramount Park and the 145<sup>th</sup> subarea also includes wetlands.

Environmentalists, biologists and others concerned about the health of the planet and its inhabitants recognize the key role wetlands play in life on Earth. The EPA points out that, besides containing a disproportionately high number of plant and animal species compared to other land forms, wetlands serve a variety of ecological services including feeding downstream waters, trapping floodwaters, recharging groundwater supplies, removing pollution and providing fish and wildlife habitat.

According to Wetlands International, a global non-profit dedicated to the conservation and restoration of wetlands around the world, wetlands are on the “front-line” as development pressures increase everywhere. “Wetlands are vulnerable to over-exploitation due to their abundance of fish, fuel and water,” reports the group, which works on the ground in 18 countries to educate the public and policymakers about the health of local wetlands and to advocate for better policies. “When they are viewed as unproductive or marginal lands, wetlands are targeted for drainage and conversion.”

“The rate of loss and deterioration of wetlands is accelerating in all regions of the world,” the group adds. “The pressure on wetlands is likely to intensify in the coming decades due to increased global demand for land and water, as well as climate change.”

The widespread expansion of development in the U.S. in recent decades has brought the issue of wetlands loss to the forefront of debates on zoning and land use planning. One of the key and underlying issues is concern about endangered species: More than a third of species on the U.S. Endangered Species List live only in wetlands and almost half use them at some time during their lifecycles. Any change to existing wetlands negatively impacts the current animal species. We must refrain from messing further with the gift of Nature here in Shoreline in Paramount Park area!

Cynthia Knox

**Response:**

The impacts to Parks from the proposed subarea plan are discussed in detail in Chapter 3.5. Impacts to wetlands and wildlife habitat are discussed in Chapter 3.4. The DEIS addendum supplements these chapters, specifically in relationship to Paramount Park. As noted in these chapters, the City recognizes the important roles parks play in the community, not only for the provision of recreation but as a source of wildlife habitat and a means for protecting natural areas. Existing park acreage will be preserved and the mitigation measures reflect the need for further park development. The protection of the functions and values of wetlands and wildlife habitat is required under both state and local law and will be addressed through the City’s newly updated Critical Areas Regulations, SMC 20.80.

**Nan Nalder****Received: April 7, 2016**

Mr Szafran:

My name is Nan Nalder. I am submitting these comments on the "Otak, Inc. 145th Street Station Subarea Planned Action Draft Environmental Impact Statement, January, Shoreline, WA. Prepared for the City of Shoreline, Washington", required citation, [145th St. Station DEIS] at the request of my son, Eirik Nalder. Eirik is a resident of Shoreline: 929 N 178th Street / Shoreline, WA 98133. Eirik has been active in the meetings and review of documents pertaining to the proposed 145th Street Station Subarea Planning activities. We have discussed at length the proposed action and Eirik asked that I prepare the following comments on the 145th St. Station DEIS to document those discussions.

By way of introduction, I served for several years drafting environmental documents for several federal agencies, including the Region X Environmental Protection Agency [EPA] where I reviewed submittals of EIS documents and related documents, including documents prepared pursuant to the Washington State SEPA process. My review is primarily based on procedural aspects of the subject. It is now 4:00 PM on April 7, 2016, and I have run out of time. Should the City be interested in further discussion, I am available.

I am submitting these comments in support of my son's concerns regarding the proposed action.

Sincerely,  
Nan Nalder, MPA

GENERAL

**Request for Issuance of a Revised DEIS Prior to Final Decision**

As noted below in these "GENERAL" and "SPECIFIC

**What is the purpose of this 145th St. Station DEIS?**

Based on my review of the document, the purpose is not clear. Is the DEIS about Ordinances and Zoning presumed on a prior decision to site the 145th Street Station, or is it about siting the station?

**Is the 145th St. Station DEIS "Tiered" Off of Prior Decisions?**

It appears that the subject Draft Environmental Impact Statement [DEIS] is "tiered" off of another document, if not several. However, there is no discussion of "tiering" in the text of the subject document. There are references to prior documents, but there is no clear description, nor etailed citations within the text, describing how decisions made in prior documents relate specifically to this 145th St. Station DEIS. Please provide a detailed "roadmap" showing the reader how all of the prior decisions relate to the subject DEIS.

**Are Federal Funds involved in the proposed action?**

Based on my understanding, there are Federal funds involved in the proposed regional transit system. If so, please discuss inclusion of Federal funds and how this document complies with the requirements of the National Environmental Policy Act [NEPA].

**Prior Decisions:**

There are many statements to the effect that "This DEIS assumes that the light rail station would be implemented with or without zoning changes in the subarea." [FACT SHEET I Page FS-1; Proposed Action and Alternatives] However, there is no clear description supporting this assumption. Please provide a clear description documenting prior decisions and matters yet to be decided.

**Use of "will" vs "would" at DEIS Stage:**

Related to the above question, at this stage that being a DEIS, of a project proposal the reference to potential future actions ought to state "City would". However, throughout the 145th St. Station DEIS the document states consistently that the "City will". Is there an action taken by the City as regards "will" vs "would" that is not disclosed in the subject document? Under SPECIFIC COMMENTS in the table below I identify some examples of where the use of "will" rather than "would" as regards the subject action is presented. Because the document is replete with the use of "will", I do not identify every example of this. Please reissue a version of this DEIS that clearly identifies prior decided actions as opposed to the proposed actions presented in this DEIS.

**Consideration of Alternatives:**

Related to the above two points, Chapter 2 - Description of the Alternatives includes a presumption that the City will accept and take future actions on a pre-selected alternative. This flies in the face of the purpose of presenting alternatives to a proposed action. The very heart of an environmental assessment of is consideration of alternatives. Because the text of this document states "will" where it ought state "would", the reader is left with a great deal of confusion regarding what are completed decisions affecting this proposal, and what is open to comment and a decision yet to be made.

**Selection of Alternatives**

How were the three alternatives selected and agreed to? There is no discussion of how the presented alternatives were developed, nor agreement as to the adequacy of the alternatives.

**The "Elephant in the Room" - Effect on Cost of Housing**

How will the City of Shoreline assure that the cost of housing - with or without the new station - will provide housing that is "affordable"? Housing in the area is presently deemed affordable as regards comparison with what has happened in other locations where transportation is enhanced.

My son would be priced out of the market if cost of rentals exceeds \$875 1 month. Many others would also be adversely affected should what has happened in Seattle happen in Shoreline. How will the City address those who would be pushed out of the area based on the drawings showing enhanced housing in the area? Bottom Line - What does the City of Shoreline consider to be "affordable"?

**Lack of Citations**

There are numerous statements inserted within the text that are not cited. Analysis is often based on adoption of such statements. Analysis of information is questionable if citations are not provided.

NOTE: both SEPA and NEPA require citations where statements are not those of author of text.

**SPECIFIC COMMENTS**

The below table identifies some of the references to my General Comments above. This is not a complete list as I had only a few hours to read the subject DEIS and identify some of the specific locations within the document that present documentation of the above General Comments.

PAGE	SECTION PARAGRAPH	COMMENTS
FS-1	Proposed Action and Alternatives	DEIS assumes that light rail station would be implemented with or without zoning changes. Is the DEIS about Ordinances and Zoning, or about siting? If the City found that the proposed station in the proposed location would not be in the best interests of residents, how would residents' preferences be considered given that most of the document presumes that the City "will agree, rather than "would" consider siting of the light rail station and related development?
FS-2	Location	Reference is made to a separate public process for the Lynnwood Link Extension and a preferred location for the light rail station in Shoreline. Discussion is posed as "potentially" to be built in Shoreline. Then there is a statement of "the City of Shoreline supports the station location included in Sound Transit's preferred alternative..." is there a separate document that discusses this "support" and a related SEPA document?
1-1	1.2.1 Purpose and	Pp1 – How does the DEIS address potential adverse impacts on renters in the area. People are

	Background	<p>being pushed out of currently “affordable” housing due to the extreme growth in the Greater Seattle Area.</p> <p>Reference to zoning provisions in the subarea. Section presumes that the proposed action would proceed due to use of language “will adopt” in this section. Is the DEIS to address real alternatives to the proposed action, or is this related to zoning and ordinances based on some prior approval? Use of “will” throughout this section is presumptive as the action is still based on selection of one of the three alternatives.</p> <p>Pp 3 – <i>“The City will adopt the 145<sup>th</sup> Street Station...”</i> Presumptive as the DEIS is based on the City’s future action.</p> <p>Pp 4 – discusses adoption of the Planned Action Ordinances and notes <i>“that offer additional housing choices...”</i> How and where in this document does the City address those who would be pushed out to higher cost rent due to development. The graphics that show new development present much higher cost housing in the area.</p>
1 – 2	1.2.2 Subarea Location	<p>Pp1 – <i>“The City of Shoreline supports this proposed location...”</i> There is no citation to this statement. How does prior support enable a fair evaluation of a proposed action?</p> <p>Pp2 – What is the “policy direction” and how does such an element relate to the consideration of alternatives?</p>
1 - 4	1.3.1 Planned Action	<p>“the City of Shoreline proposes to designate the 145<sup>th</sup> Street Station Subarea Plan as a Planned Action” Where is the reader referred to listed related actions? Where is documentation of future decisions provided?</p>
1 – 4	1.3.2 Prior Environmental Review	<p>Please provide information within this document that ties the proposed action to prior environmental review. The paragraph does not provide citizens with adequate direction.</p>
1 – 6	DEIS Comment Period	<p>Dates within this document reference 2015. It is now 2016. Please provide and updated</p>
1 – 7	1.7	<p>Please define “affordable housing”. Is there agreement within the City regarding what is “affordable”?</p>
1 – 8	Schedule	<p>Schedule is very out of date. Please provide an updated schedule.</p>
1 – 10	Overview of the Alternative	<p>pp.2 <i>“the City acknowledges that many residents would prefer the No Action scenario; however that would not implement local and regional policies regarding densities that support neighborhood serving businesses and transit in future station areas.”</i> Just because the City has</p>



		this preference, this assumption is not valid in an attempt to refute support for “No Action”. Recommend that further in-person discussions is required. As stated, does not support SEPA review.
1-12	Significant Areas of Controversy... Change in Character...	While areas are briefly discussed, text does not adequately identify options for how to address these areas. Discussion of property values underwater is strange as it is not the role of local government to bail them out.
1 – 13	Change cont’d	“the City acknowledges that even though a decision to stay or sell is entirely up to the property owner,...” “The purpose of this EIS analysis [it is a DEIS!] is not to presume that all impacts...” “it is not to sugar-coat undesirable consequences of transportation...” Looks like these sections were copied from another document. – Out of place here.
1 – 14	The Pace of Redevelopment	Pp 2 – “the opportunity and potential for growth in the 145 <sup>th</sup> Street Station Subarea would be higher with the adoption of the proposed mixed use zoning...” Assumption prior to decision! Not the statement of evenness that is required in a DEIA.
1 – 14		Statement in bold type face: <i>“With all of these considerations, the anticipated average annual growth forecasted for the subarea is around 1.5 percent to 2.5 percent. This is the assumed growth rate for purposes of subarea planning and environmental analysis.”</i> Statement is not referenced, who and where was this quote presented?
1 – 15	Available Funding for Infrastructure Improvements	Unless the City has approval for funds envisioned in the proposed action, residents of the City will suffer. How do you assure that the City will have funds to plan for exponential growth?
1 – 15	1.9 Significant Unavoidable Adverse Impacts	Again, there is a presumption that the transportation system will proceed with or without adequate funding.
1 – 15	Land Use Patterns, Plans and Policies	Pp2 – <i>“Impacts on land use compatibility would be mitigated with implementation of design and transition standards in the City’s Development Code...”</i> There is no consideration in this section of how development and funding would be staged. A lot of words, but no plan.
1 – 16		What are the jobs to housing ratio goals?
1 – 16	Multimodal Transportation	How would significant and negative impacts due to increase in traffic be considered and mitigated? <i>“The rate of growth and change in the subarea would occur very gradually, over many</i>

		<i>decades.” Seattle took this position and growth has been totally not well planned nor have services kept up0 with it. “A basic goal of implementing high-capacity transit in the region is to reduce...” Cite – whose goal is this? How is it applicable in Shoreline?</i>
1 – 16	Wetlands, Stream, and Surface Water Management	<i>“There are opportunities to enhance existing stream corridors and wetlands...” One cannot “enhance” a wetland area – there are requirements where a wetland would be affected on Federal, State, and Local Levels. You can protect, avoid, and mitigate, however “enhancement” is not workable.</i>

**Response:**

The 145<sup>th</sup> Street Station DEIS and the DEIS Addendum address the probable adverse environmental impact arising from the City’s proposed establishment of a subarea and related rezoning of that area. The City’s proposal does not include the siting of a light rail station. The siting decision of the light rail station, an essential public facility, was made by Sound Transit and its impacts are addressed in the Lynnwood Link Extension FEIS (April 2015). While the City commented on the siting location, the location was within the jurisdictional authority of Sound Transit. The City’s proposal is not subject to NEPA nor was Sound Transit’s decision for the siting location based on the City’s proposal. Documents relied upon by the FEIS are either directly cited in the text of the document or provided for in Chapter 5 References. The FEIS has been updated, as necessary, to reflect the issuance in 2016 including the adjustment of planning timelines/schedules.

Specific actions taken in relationship to the final adopted subarea will be made by the City Council, which will be open to public review and comment. The DEIS and the DEIS Addendum analyze the probably adverse environmental impacts of the proposed action; the EIS process is not an economic analysis and therefore a discussion of funding is not required. Chapter 2 discusses the process by which alternatives were developed, including scoping for the EIS and a variety of community workshops. Alternative 4, which is analyzed in the FEIS, arose from comments received during the DEIS and DEIS addendum comment periods. Chapter 3, Section 3.1 Land Use Patterns, Plans, and Policies, along with Section 3.2 Population, Housing, and Employment address housing stock and affordability. Affordability is defined in the SMC as well as being established under both federal and state law. These chapters discuss the City’s obligation to plan for both housing and employment targets as established pursuant to countywide planning policies and how growth assumptions were established. Chapter 3, Section 3.3 addresses Transportation impacts, including multi-modal transportation needs and mitigation measures to address. Chapter 3, Section 3.4 addresses the impact to streams and wetlands. Shoreline Municipal Code 20.80, the City’s critical area regulations, requires protection of the functions and values of these areas. Redevelopment of property encumbered by critical areas provides an opportunity for restoration or enhancement, something that would not occur if the status quo is maintained.



The implementation of the proposal envisioned by the EIS will require the adoption of a subarea plan, amendments to the City's Comprehensive Plan and Development Code regulations. The implementation may also include the enactment of a planned action ordinance as provided by Revised Code of Washington (RCW) 43.21C, the State Environmental Policy Act. All alternatives are available for implementation by the City Council.

**From: Dr. Sarah Cooke**

**Received: April 7, 2016**

Please refer to my March 10<sup>th</sup> comments as the prequel to these comments.

My comments below will be focused on the southwest side of Paramount Open Space.

It has come to my attention that the board is now considering revising the proposed zoning east of the Paramount Open Space to R-6 but not the southwest side of the Open Space. This area is still proposed for a MUR-35 zoning (See attached Figure 1). This Figure is the one discussed at the last meeting in early April as the most current Figure.

I feel it is important to point out that the map is actually inaccurate. There is a stream shown on this Figure as ending at 10th AVE NE that actually continues through the back yards of virtually every one of the lots between 10th Avenue NE and 9th Place NE from NE 14<sup>th</sup> St, south to NE 145th ST (Figure 2). In reality, according to the City's own GIS mapping and my personal observations, the stream consists of three separate tributaries that are identified in the City's GIS database (Figure 2), but which are not shown on the map generated by the City for the alternatives for the proposed zoning changes. This stream is also associated with wetlands for many of these parcels and although I was only able to peek into people's backyards from 10<sup>th</sup> AVE NE, it is clear that yet again, the City's work towards this proposed rezoning is inaccurate and is giving the Planning Commission and the Public an inaccurate view of the potential impacts of the proposed zoning changes. The MUR-35 zoning will not be possible in this southwest adjacent neighborhood because virtually every parcel east of 9<sup>th</sup> Place NE is encumbered by the stream and also possibly by associated wetlands. (See Figure 3 for the documentation of this stream.)

With the issues I raised in my March 10<sup>th</sup> comment letter (the inaccuracies with the Otak delineation of wetlands and streams in the Paramount Open Space and adjacent neighborhood east of the Park, the lack of abiding by the City's own Surface Water Master Plan when proposing the rezoning in the areas adjacent to the Park, and the lack of information and understanding of the geology and groundwater in the region), and those identified here, it is apparent there are substantial problems with the City's analysis for the proposed rezoning. If these issues have been found in just the areas where I examined the proposal, I feel the Planning Commission and the public should also

feel very uneasy about the prospect of voting on the proposed zoning changes. Especially given how inaccurately and incompletely the City staff appears to understand the actual conditions on-the-ground within the City's holdings that would be affected for this rezone. Staff have already spent a considerable amount of money on this project and collected what appears to be even less accurate information than they already had. It does not bode well for there to be trust that future information will be any more complete or accurate or that a vote on the rezone proposal in just a few months is possible.

I do plan on reviewing the delineation of the Twin Ponds Park area and the City's analysis of the rezone potential in that area once it is completed. I was involved with the Citizen's review of the Aegis construction that allowed them to construct their buildings with virtually no buffer on Peverely Pond that has led to its complete degradation. I think it is important at the juncture to stand back and assess what is needed in terms of background studies and information before the City of Shoreline makes any more decision that could affect the environment and health of the community.

Please feel free to contact me if you have any questions regarding this review.

Sarah Spear Cooke

**Response:**

Probable adverse environmental impacts to wetlands and streams are addressed in Chapter 3.4 of the FEIS as well as in the DEIS Addendum. As noted, Alternative 4 Compact Community Hybrid retains existing R-6 along a majority of the area surrounding Paramount Open Space. MUR 35 is proposed along the Western edge of this open space, a zoning district with a similar intensity to the R-6 zone. As is the case throughout the City, the development of any property in this area will be required to conform to SMC 20.80, the City's Critical Area Regulations which established standards, including buffers, for those projects occurring on land encumbered by critical areas such as wetlands and streams. The City's GIS map reflects both a network of streams in this area as well as an extensive wetland complex, with this information available during the EIS review process to inform the ultimate decision.

**From: Barbara Dykes Ehrlichman, representing Shoreline Preservation Society**

**Received: April 7, 2016**

Dear Planning Commission Members,

The following comments are made on behalf of our client, the Shoreline Preservation Society, a Washington non-profit corporation, and Janet Way, John Behrens, and Wendy DiPeso as individuals. This group is collectively referred to herein as the “Shoreline Preservation Society” or “SPS.” As you know, SPS actively participates in the City’s planning process with the intent of promoting and supporting sustainable future development, supported by good capital facilities planning and levels of public services that maintain and enhance the high quality of life treasured for decades in the City of Shoreline. SPS meets the test for SEPA standing, in that it is within the zone of interest, and will suffer injury in fact as a result of this proposed action. Further information on standing is found in the attachment to this letter.

SPS thanks you for the opportunity to comment upon the DEIS and engage in the public discussion of the preferred alternative. We greatly appreciate the challenges the Planning Commission faces, as well as the hard work required to wade through these issues and make wise recommendations for the community. Thank you for your consideration of the following.

1. LACK OF CLEAR DIRECTION IN THE DEIS ON PLANNED ACTION ORDINANCE (FACT SHEET: Page FS-3 through 4, “Planned Action Environmental Impact Statement Process”).

Based on the narrative in this section, the City may be planning to enact another planned action ordinance, similar to the one enacted as part of the 185th Street Station Subarea Plan, although no draft ordinance has been provided at this stage for public comment at public hearing. The Shoreline Preservation Society and the 145TH Street Station Subarea Plan DEIS and Preferred Alternative other commenters have done extensive research on the planned action provisions of the State Environmental Policy Act (SEPA) statute and implementing regulations. We urge you to review RCW 43.21C.440 and implementing WACs, and revise this section of the Draft EIS to comply with the requirements of the statute. RCW 43.21C.440(1) sets out the basic definition for a planned action and the requirements for adoption of any planned action ordinance, that include a requirement to address project-level impacts:

(1) For purposes of this chapter, a planned action means one or more types of development or redevelopment that meet the following criteria:

- (a) Are designated as planned actions by an ordinance or resolution adopted by a county, city, or town planning under RCW 36.70A.040;
- (b) Have had the significant impacts adequately addressed in an environmental impact statement under the requirements of this chapter in conjunction with, or to implement, a comprehensive plan or subarea plan adopted under chapter 36.70A RCW, or a fully contained community, a master planned resort, a master planned development, or a phased project;
- (c) **Have had project level significant impacts adequately addressed in an environmental impact statement unless the impacts are specifically deferred for consideration at the project level** pursuant to subsection (3)(b) of this section;
- (d) Are subsequent or implementing projects for the proposals listed in (b) of this subsection;
- (e) Are located within an urban growth area designated pursuant to RCW 36.70A.110;
- (f) Are not essential public facilities, as defined in RCW 36.70A.200, unless an essential public facility is accessory to or part of a residential, office, school, commercial, recreational, service, or industrial development that is designated a planned action under this subsection; and
- (g) Are consistent with a comprehensive plan or subarea plan adopted under chapter 36.70A RCW.  
RCW 43.21C.440 (emphasis added).

The “SEPA Rules” adopted by the Department of Ecology to implement SEPA, as mandated by RCW 43.21C. 110, also contain procedures for the adoption of planned action ordinances, at WAC 197-11-168. These procedures expressly require that the City’s planned action ordinance” describe how the planned action meets the criteria of 197-11-164 (including specific reference to the EIS that addresses any significant adverse environmental impacts of the planned action).” WAC 197-11-168(2)(b).1

In 2012, the Legislature amended SEPA to allow cities to pre-plan for “development or redevelopment projects,” as long as the city first adopted an environmental impact statement of a certain caliber during a subarea planning process. RCW 43.21C.440(1). Under the planned action statute, the Legislature authorized qualifying cities to front-load the review of project impacts, rather than conducting SEPA review at the time a project proponent submitted a development permit application. RCW 43.21C.440. However, SEPA only authorized use of this streamlined approach if the environmental review for the project impacts was conducted up-front, at the time the city was amending a subarea plan or comprehensive plan. RCW 43.21C.440(1)(b). The statute contains an express requirement that any future planned action development project had its “project level significant impacts adequately addressed” in that earlier environmental impact statement for the subarea plan or comprehensive plan. RCW 43.21C.440(1)(c). SEPA further provided that a city’s procedures for adoption of an ordinance authorizing planned actions include findings that the future project(s) had their “project level significant impacts” addressed already.

The Statutory Requirement for Project-Level Impact Analysis Under SEPA. The planned action procedure contemplated under SEPA requires up-front environmental review of project impacts, because the process takes the place of SEPA’s usual process, where permit applications

are subject to public review, environmental determinations, and possible appeals. The new 2012 SEPA planned action procedure streamlines the permit process in furtherance of the WAC 197-11-164 mirrors the definition of planned action found in RCW 43.21C.440. Legislature's goal of promoting infill development within urban growth areas like the City. RCW 43.21C.440.

In streamlining the process, however, the Legislature did not abandon the right of citizens to appeal project-level impact analysis under SEPA, a long-held right in this state. It simply moved that right forward in time, to the earlier legislative decision designating the planned-action area and adopting procedures for planned actions. In other words, Section .440 required the City to conduct that kind of project-level review – with right of citizen appeal – at the time it adopts its subarea plan designation for the planned action area and adopted procedures.

The City has not conducted project level analysis in the DEIS, so under RCW 43.21C.440, therefore the City must specifically defer consideration of project level impacts to the project level, along with all of the procedural requirements of SEPA. What the City cannot do is eliminate SEPA environmental review without a rigorous review of project-level impacts, the mistake it made in the 185th Street Subarea EIS process.

The Legislature recognized that this “front-loading” of environmental review in the planned action process could be abused, to the detriment of the public and existing neighborhoods. In the ordinary case, a citizen questioning the environmental impacts of a project can appeal the SEPA threshold determination for the project and thereby challenge the mitigation measures attached to the project. The Planned Action eliminates this step, because it relies on the adequacy of project-level mitigation measures adopted in the planning-stage EIS.

To safeguard against the possible elimination of project-level SEPA review altogether through the planned action mechanism, the Legislature imposed unambiguous procedural safeguards for planned action ordinances: the planned action ordinance must be supported by detailed analysis of anticipated project significant impacts, complete with identified measures that will mitigate the adverse impacts of individual project developments. RCW 43.21C.440. *See WASHINGTON REAL PROPERTY DESKBOOK VOLUME 5: LAND USE PLANNING*, § 14.3(1)(d) at 14-33 (4th ed. 2012). Under the unambiguous language of Section .440(1)(b), (c), the Legislature required that use of this early planned-action designation contain sufficient environmental analysis of project-level impacts to take the place of any normal project environmental review.

SPS understands that it is not possible for the City to review project level impacts at the subarea plan level at this time because there are no “projects.” But if project level impacts are not addressed now, they must be addressed at the project level. SPS believes that the level of planning engaged in by the City at the nonproject level is not suitable for use of the planned action device. It shortchanges the

environment, the taxpayers of this City, the residents, the City government, and most of all, our future generations who will have to live in these areas.

**SPS urges the Planning Commission to eliminate the planned action ordinance from the suite of actions proposed for 145th Street to allow better participation by the citizens of Shoreline in the future of their City.**

The City, in litigation with SPS over the Planned Action Ordinance for 185th Street, claimed that the project-level impact requirement did not apply because the City had “specifically deferred” project level impacts until the time of permit application. However, there was no indication in the FEIS or in the ordinance itself that specified what impacts were deferred, nor how they would be addressed at the project stage. While the City argued that the consistency finding by the Planning Director equated to deferral of environmental review of project level impacts, this rationale simply does not square with the SEPA statute. There is no prescribed procedure in the ordinance for addressing those impacts, nor is there any opportunity for public notice and citizen comment and appeal.

**SPS requests that the Planning Commission engage in a dialogue about the mechanics of the Planned Action Ordinance with staff and with the public on the following questions:**

- **How will project level impacts be addressed?**
- **Why is there no public notice or comment procedures?**
- **Why aren't specific impacts deferred to the project stage in the DEIS?**
- **Is Shoreline city government willing to simply give up environmental review of project level impacts and are the citizens willing to condone it?**
- **Why adopt a planned action ordinance if project level impacts are deferred to the project level?**
- **Why doesn't the City provide a transparent process for considering project level impacts?**

## 2. REQUIRE PUBLIC NOTICE FOR PLANNED ACTION ORDINANCE

SPS asks the Planning Commission to consider whether adequate public notice of the planned action ordinance occurred during the 185th Station Subarea Plan process. The Planned Action Ordinance never even surfaced from the planning department until well after the public hearing on the ordinances was over (ordinance surfaced in mid-February 2015; public hearing was Jan. 15, 2015). Therefore, citizens never got the opportunity to review, comment, and engage with its elected officials on the merits of an ordinance which deprived them of the right to comment upon and if necessary, appeal project-level impacts that affect them and their neighborhood. The process for enacting Ordinance 707 was also illegal under the optional municipal code, RCW Chapter 35A.63. The City argued in the SPS litigation that the optional municipal code no longer applies to land use matters in the City of Shoreline. The court never reached the question, but it is clear

under case law that it still applies. See *Whatcom Cy. v. Brisbane*, 125 Wn.2d 345, 354 (1994); *Brinnon Grp. v. Jefferson Cy.*, 159 Wn. App. 446 (2011). Since the City's position appears to be unsupported by law, SPS suggests that a Planning Commission member request an Attorney General Opinion to allow a neutral third party to opine on the matter.

Public process and notice is very important, especially in the City of Shoreline where the City Council is driving sea change within the City limits. Citizens should not be shortchanged during important processes such as this one.

**SPS requests that the Planning Commission direct the Planning Department:**

- to provide a copy of any proposed planned action ordinance upon issuance of the FEIS, so that there may be a full public hearing process on the ordinance.
- to notice all the ordinances in this process as required by the optional municipal code.

**3. RECOMMEND R-6 ZONING SURROUNDING ALL PARKS IN THE SUBAREA AS PART OF THE PREFERRED ALTERNATIVE**

The City of Shoreline is known for its parks and its tree cover. There is an abundance of bogs, wetlands, ponds, and riparian areas that are critical to the ecological health of the creeks in Shoreline, Lake Washington and ultimately the Salish Sea.

Contrary to the findings in the staff report, Best Available Science clearly indicates that urbanization of a landscape (increase of impervious surfaces and reduction of tree cover) has profound negative effects on streams, wetlands, habitat, and the marine environment.

Washington Departments of Ecology and Fish and Wildlife, *Wetlands in Washington State, Vol. 1* at 3-32 and Chapter 3 (2005)

<https://fortress.wa.gov/ecy/publications/documents/0506006.pdf>. The report summarizes the devastating effects of urbanization on p. 3-32:

- Increases in urban population are generally accompanied by increased development density and sprawl. Wetlands in these areas may be converted to urban land uses or may be degraded through a variety of causes.
- Urbanization results in modifications to water movement, alterations to riparian corridors, human intrusions, introduction of chemical contaminants, and increased areas of impervious surface. These changes profoundly affect environmental processes in contributing basins and, therefore, the downgradient drainage systems.
- Urbanization alters the movement of water into aquatic systems. Consequences of increased amounts of water include an increased frequency of erosive flows, greater volume of runoff, and longer duration of high flows.

- With urbanization comes increased transport of sediment, nutrients, metals, oil, pesticides, and other contaminants in surface runoff.
- Fragmentation of habitat results as the total area of wetlands is reduced and the connections between wetlands and other habitats are eliminated. *Id.* at 3.4.9. The City argues that better drainage conveyance facilities will accompany redevelopment and that these improved drainage facilities will result in increased water quality and habitat in our wetlands, streams, and ponds. That justification is simply not supported by the science, as demonstrated above. However, even assuming for the sake of argument that it is true, the City also points out that redevelopment will occur even if the zoning remains at R-6. **Given that fact, SPS believes the City's argument reinforces the case for leaving the zoning of all areas surrounding our parks and significant critical areas at R-6.** This result will ensure that Shoreline does its part in protecting our region's endangered natural resources, while accommodating growth.

**SPS requests that the Planning Commission follow best available science and leave all park and significant wetlands area within the R-6 designation and zoning, thereby ensuring preservation of quality of life within Shoreline and ensuring that the City does its part in protection of Lake Washington and the Salish Sea.**

#### 4. THE PARAMOUNT AND TWIN PONDS PARK AREAS SHOULD NOT BE INCLUDED IN THE REZONE AREA

The Paramount and Twin Ponds Park areas should not be included in the rezone area, authorizing any multi-family zoning. We urge the Planning Commission to continue to recommend against their inclusion. Based on the following, the DEIS and its Addendum contain conflicting statements that prove that either:

- a. the impacts of the "project" identified in the notice of public hearing have not been evaluated sufficiently to determine whether they will result in probable significant adverse environmental impacts (in which case the proposal should be denied);  
or
- b. the conclusions are not supported by adequate analysis or factual inquiry; the conclusion that redevelopment in areas of historic flooding with wetlands will not result in probable significant adverse environmental impacts fails the rule of reason and the DEIS is inadequate.

By way of example, Page 7 of the staff report for the DEIS Addendum states: Regarding subsurface conditions related to soils that contain peat, high groundwater conditions, and liquefaction potential, individual site-by-site analyses will need to be completed as part of future redevelopment to determine potential effects. There are a variety of geotechnical and structural engineering treatments that can address these conditions as part of site development.

*Memorandum to Planning Commission from Otak Engineering*, dated January 21, 2016 re Additional Technical Assessments at 7. The analysis plainly states that not enough study has been done to determine whether the area includes portions that have high groundwater or liquefaction potential that would make multifamily buildings unsuitable. Further study is needed to make that determination. Page 1 of the Otak memorandum to the Commission reinforces this when it admits that the level of analysis was not project-level analysis, i.e., the analysis involved only “planning level assessments.” *Id.* at 1. Staff may argue that evaluation of soils and hydrologic integrity for multi-family zoning will be addressed at the project stage of review. If that is the case, SEPA requires the City to produce an ordinance that expressly lists this as a SEPA impact of the rezone project that is being deferred until this later site-specific review, and thus citizens will have an opportunity to appeal at that stage under Section .440(3) of SEPA: (b) A county, city, or town is not required to make a threshold determination and may not require additional environmental review, for a proposal that is determined to be consistent with the development or redevelopment described in the planned action ordinance, except for impacts that are specifically deferred to the project level at the time of the planned action ordinance's adoption.

RCW 43.21C.440(3)(b) (underline added). This specific listing of deferred impact analysis is important because SEPA then expressly provides citizens a right of appeal to challenge the adequacy of this later impact analysis: The determination of consistency, and the adequacy of any environmental review that was specifically deferred, are subject to the type of administrative appeal that the county, city, or town provides for the proposal itself consistent with RCW 36.70B.060. *Id.* The appeal right should be expressly stated in the planned action ordinance by listing “any environmental review that was specifically deferred.”

It is difficult for Citizens to comment on the adequacy of the City’s SEPA analysis in this DEIS and Addendum without first seeing the ordinance. Without the ordinance, it is unknown whether the City intends this hydrological analysis to be one of those expressly deferred to later site-specific project review, with right of appeal under SEPA. We urge the City staff to clarify this for the Planning Commission and the public by providing a draft ordinance, prior to the close of public hearing on the DEIS.

It is also unclear from the City’s notice whether this public hearing on April 7 was intended to be limited to a hearing on the DEIS and its Addendum, or whether it was also intended to be the public hearing on the planned action ordinance. The notice refers to the DEIS as “the above project.” However, the project has not been defined for purposes of public hearing and certainly the planned action ordinance has not been provided for public review in advance of the hearing. We request that the Planning Commission continue this hearing until staff clarifies whether a separate hearing will be held on the planned action ordinance. If not, the Planning Commission must keep the record open to allow public comment on that ordinance, once it is produced by City staff with a recommendation to the Planning Commission, with appropriate advance public notice published in the newspaper. RCW 35A.63.070, .100.

**SPS requests that the Planning Commission adopt a preferred alternative that does not include the Paramount and Twin Ponds Park in the rezone area.**

5. DEFER ADOPTION OF THE 145TH SUBAREA PLAN AND FEIS UNTIL SUCH TIME AS THE CITY ADOPTS IMPACT FEE ORDINANCES

One of the primary concerns that SPS has regarding the DEIS and subarea plan is that while the City is prescribing mitigation measures for the next 20 years through the planned action ordinance, it is deficient in its ability to require developers to shoulder some of the costs of the resulting impacts. Without use of impact fee tools provided to the City by the state Legislature, the City is handicapped in its ability to ensure that taxpayers do not end up footing the entire bill for new growth, while developers pocket the profits. The City does not currently collect impact fees from developers as permitted under RCW 82.02.050 - .090 for anything except transportation. Under RCW 82.02.050, the City is authorized to collect impact fees on the following public facilities: (a) Public streets and roads; (b) publicly owned parks, open space, and recreation facilities; (c) school facilities; and (d) fire protection facilities. See RCW 82.02.090(7).

As a part of this aggressive push to redevelop the 145th Street neighborhood, it is unconscionable for the City to adopt this zoning without requiring developers to pay their way as provided by this statute. The Planning Commission should recommend to the City Council that the planning department immediately get busy on putting together impact fee ordinances for parks, open space, and recreational facilities; school facilities; and fire protection facilities. It seems doubtful that the City later require developers to mitigate these impacts when the DEIS and FEIS do not name those ordinances as mitigation measures; therefore the City needs to enact these impact fee ordinances and name those regulations as mitigation measures before the Subarea Plan and FEIS are enacted.

As urbanization intensifies within this area, funding for open space, fire protection, and schools must be part of the picture. Without it, there will be a steady decrease in the quality of life at a commensurate pace with the development that comes into the area.

**SPS requests that the Planning Commission direct planning staff to put this project on hold and instead spend staff resources on developing impact fee ordinances that will offset the cost of new development in the 145th Street area.**

6. DEFER FURTHER CONSIDERATION OF THE DEIS OR THE PREFERRED ALTERNATIVE UNTIL THE CORRIDOR STUDY IS COMPLETE

SPS adopts and incorporates by reference ALL comments made by Jan Stewart in her April 7, 2016 letter submitted to the Planning Commission. SPS wants to emphasize that the corridor study must be completed before the Planning Commission finalizes any preferred alternative or its consideration of the DEIS.

**SPS requests that the Planning Commission direct planning staff to defer any further consideration of the 145th Street Station Plan and DEIS until the corridor study is completed.**

#### 7. COMPLETE CAPITAL FACILITIES PLANNING FOR SUBAREA BEFORE ADOPTING NEW INTENSIVE DESIGNATIONS AND ZONING

The DEIS reveals a lack of appropriate capital facilities planning. Under RCW 36.70A.070(3), all capital facilities plans must contain the following:

- a. An inventory of existing capital facilities owned by public entities, showing the locations and capacities of the capital facilities;
- b. A forecast of the future needs for such capital facilities;
- c. The proposed locations and capacities of expanded or new capital facilities;
- d. At least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public
- e. money for such purposes; and
- f. A requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent. Park and recreation facilities shall be included in the capital facilities plan element.

Part of this package, as determined by Growth Management Hearings Board decisions, is a determination of probable sources of funding, even for the 20-year plan. It need not be nearly as specific as the 6 year CIP, but it must sketch out a rough estimate of how the new development envisioned by the plan will be funded. It is essential part of the City's obligation to its citizens: the citizens have a right to know how this intensive new development will be paid for.

**SPS requests that the Planning Commission direct planning staff to defer any further consideration of the 145th Street Station Plan and DEIS until the corridor study is completed.**

#### 8. AVOID PHASED ZONING AND INSTEAD ADOPT NEW ZONING ONLY FOR AREAS FOR WHICH DETAILED CAPITAL FACILITIES PLANNING IS COMPLETED

The agenda for the April 7, 2016 Planning Commission hearing includes an unsigned and undated staff report (Agenda Packet Item 6a) stating that the Commission will be considering the recommended preferred alternative shown in the map at Attachment F ("Compact Community Hybrid"). However, the staff report also describes at least four other options, including at least two that involve "phased zoning."

The staff report recommendations on phased zoning are not well presented or described. References are made to maps at attachments B, D, E and F. Phasing proposals for the Phased Connecting Corridor and Phased Compact Community are mentioned, as a comparison to a new “Compact Community Hybrid” that is said to include “some elements of the Phased Connecting Corridor Alternative,” with references to the map at “Attachment F.” **However, the map does not contain any information about what zoning would be phased.** The public deserves a clearer explanation of what the staff and Planning Commission subcommittees are recommending, prior to holding public hearings to take comment on those recommendations.

We urge the Commission and City Council to avoid phased zoning and instead zone only those smaller areas for which the City has completed its project-level capital facilities and environmental analysis. Phase 1 of the Compact Community alternative (Attachment E) approximates the kind of more limited zoning the City would take under this approach, i.e., adopting Phase 1 alone, without subsequent phasing. The City should not proceed with phased rezones of larger areas (potentially described as a planned action area in some future ordinance – not yet produced) until it completes project-level work. The Planning Commission should reject the phased zoning shown in Attachment D and implied in Attachment F.

Under the City staff’s phasing proposals for these larger areas, subsequent changes to existing zoning take place automatically, without any additional public hearing or City Council vote, regardless of changed conditions that may exist at that future date (lack of funds, environmental changes, increased flooding due to climate change, etc.). At the time future phases are adopted today, the impacts of future conditions are not well described or understood by the public or decision makers.

This phased zoning approach, when spread out over a long stretch of time for areas not yet studied for environmental impacts and capital facilities needs, violates SEPA, RCW 43.21C, the Growth Management Act, RCW Chapter 36.70A, and the intent of the Optional Municipal Code. RCW Chapter 35.63A.

**SPS requests that the Planning Commission adopt a preferred alternative that avoids phased zoning and instead adopts new zoning for only those areas for which detailed capital facilities planning has been completed.**

#### 9. REQUEST TO EXTEND PUBLIC HEARING AND LEAVE RECORD OPEN TO ALLOW FURTHER PUBLIC COMMENT

SPS requests the Planning Commission to extend the time allowed for public discussion of this proposal. The City has devoted a number of years to this work, and it is quite a bit for the average working citizen to digest in a timely fashion. The decisions the Planning Commission is considering will affect the 145th Street neighborhood for many years to come.

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**SPS requests that the Planning Commission continue the public hearing until next month and leave the record open to encourage further public discussion and dialogue about the future of the 145th Street Station Subarea.**

Please feel free to contact me if you have any questions or concerns, or would like further information on any topic in this letter.

Very truly yours,  
Barbara Dykes Ehrlichman  
Partner

**ATTACHMENT: FACTS SUPPORTING SPS STANDING**

The Shoreline Preservation Society (SPS) is an active Washington non-profit corporation founded September 13, 2010 association, UBI Number 60347960. The SPS is a local, grassroots organization fostering the preservation of Shoreline's neighborhoods, as well as historical, cultural and environmental assets throughout the Shoreline area. A major component of the work of SPS is to educate Shoreline residents and disseminate information about proposed changes and impacts due to rezones and other city or developer actions, to participate in the public process, and to provide alternatives as needed to preserve the character of Shoreline's neighborhoods. SPS will be directly harmed by this proposed action because the character of the neighborhoods in the 145th Street Subarea, as well as surrounding areas, including the historic, cultural and environmental assets, will likely be substantially altered and diminished, if not destroyed by new high density development authorized by these Ordinances without the necessary infrastructure to support it. The City of Shoreline has thus far failed to conduct adequate planning as required by the GMA (in particular capital facilities planning) and environmental review to ensure that a dramatic and intensive increase in density and up-zone in the 145th Street Subarea would not negatively affect city infrastructure such as transportation networks, surface water management, water supply and sewer. Because of the lack of adequate infrastructure and the lack of identified funds to pay for new infrastructure, negative impacts will result from approval of these actions and significantly degrade quality of life in the City of Shoreline. Infrastructure will be inadequate to handle the large surge in population that will result if these densities are implemented. These impacts will destroy the character of these neighborhoods which SPS is dedicated to preserving.

6.1.2. Petitioner Janet Way. Janet Way resides at 940 NE 147th Street, Shoreline, Washington 98155. Ms. Way has resided in the City of Shoreline (City) since its incorporation in 1995, and in the same home for 25 years. She is the President of Shoreline Preservation Society. Ms. Way is deeply committed to maintaining the character of the City of Shoreline and the surrounding areas, particularly in preserving the Thornton Creek Watershed, wildlife habitat, and the tree canopy within the City. Her commitment is evidenced by her activities with SPS, Thornton Creek Alliance, the Paramount Park Neighborhood Group, and the Thornton Creek Legal Defense Fund. Ms. Way served on the Shoreline City Council from 2005-2009.

Ms. Way will be harmed by this action because she will suffer from the negative impacts of poorly planned intensive urban development near her home, including worsening traffic, drainage impacts, impacts to the Thornton Creek watershed which she has worked so hard to restore, and destruction of wildlife habitat and the tree canopy within the City of Shoreline. She enjoys the quiet neighborhood feel of the City of Shoreline, the many birds that live in the tree canopy, and the areas of wildlife habitat, many of which will be substantially altered and diminished, if not destroyed by the dense urban development that will result from adoption of these ordinances and the Board's approval thereof, particularly without adequate planning for urban infrastructure to support it.

6.1.3 Petitioner John Behrens. John Behrens resides at 18332 Meridian Ave.N, Shoreline, Washington 98133. Mr. Behrens has resided in the City of Shoreline (City) since its incorporation in 1995, and in the same home for 23 years. He is the Treasurer of Shoreline Preservation Society. Mr. Behrens will be harmed by the negative impacts of poorly planned intensive urban development near his home, including worsening traffic, drainage impacts, impacts to the Thornton Creek watershed, and destruction of wildlife habitat and the tree canopy within the City of Shoreline. He enjoys the quiet neighborhood feel of the City of Shoreline, the many birds that live in the tree canopy, and the areas of wildlife habitat, most of which will be substantially degraded if not destroyed by the dense urban development that will result from adoption of this action, particularly without adequate planning for urban infrastructure to support it.

6.1.4 Petitioner Wendy DiPeso. Wendy DiPeso resides at 328 NE 192<sup>nd</sup> Street, Shoreline, Washington 98155. Ms. DiPeso has resided in the City of

Shoreline (City) since 2002. She is also the Secretary of the Shoreline Preservation Society. Ms. DiPeso will be harmed by the negative impacts of poorly planned intensive urban development near her home, including worsening traffic, drainage impacts, impacts to the Thornton Creek watershed, and destruction of wildlife habitat and the tree canopy within the City of Shoreline. She enjoys the quiet neighborhood feel of the City of Shoreline, the many birds that live in the tree canopy, and the areas of wildlife habitat, most of which will be substantially degraded or destroyed by the dense urban development that will result from adoption of this action, particularly without adequate planning for urban infrastructure to support it.

**Response:**

The City will comply with RCW 43.21C and its implementing regulations in regards to the adoption and implementation of a planned action ordinance if it elects to utilize that legislatively authorized tool for the subarea. The DEIS for this subarea may serve as the basis for that ordinance. The planned action ordinance, along with the Subarea Plan and any necessary amendments to the City's existing regulations will be the subject of further review by both the Planning Commission and City Council. The City will provide notice for these actions as required by law.

The DEIS and its addendum review the probable adverse environmental impact of the proposed action, the 145<sup>th</sup> Street Station Subarea Plan. The City Council did not elect to identify a Preferred Alternative in the FEIS. In regards to comments specific to impacts analyzed in the DEIS and/or DEIS Addendum, natural areas (e.g. wetlands, streams) are addressed in Chapter 3.4. Alternative 4 – Compact Community Hybrid retains R-6 zoning around a large portion of the three parks in the subarea – Twin Ponds, Paramount Park, and Paramount Open Space – with connectivity between Paramount Park and Paramount Open Space. Thus, the FEIS provides an analysis of impacts based on the retention of this low-density zone. Park area is presently designated Park and this classification will remain regardless of which alternative is implemented. Development activities in these natural areas, as well as in areas with potential geotechnical constraints, will be subject to compliance with SMC Chapter 15.15, Building and Construction and SMC Title 2, Uniform Development Code, which requires the protection of the functions and values of critical areas and methods to ensure the structural integrity of any development proposed on a site. As denoted in Chapter 3.5, the City is considering a parks impact fee. Impact fees for schools and fire are not expressly under the City's control as both the school district and the fire district are separate and distinct entities. If those entities request implementation of impact fees, RCW 82.02 gives the City the mechanism for inclusion as a mitigation measure. The FEIS, in all chapters discussing impacts, has enhanced the analysis of phased zoning.

The 145<sup>th</sup> Corridor Study has been completed and, where appropriate, has been incorporated in the FEIS. See specifically, Chapter 3.3 Transportation. Capital facilities is discussed primarily in Section 3.3 Transportation and Section 3.7 Utilities but also included in chapters such as Section 3.6 Public Services. The City's Comprehensive Plan fully addresses capital facilities planning and will be amended based on the adopted alternative.

**From: Shoreline Preservation Society, Janet Way**

**Received: April 7, 2016**

Dear Planning Commissioners and Mr Szafran:

Please accept these additional comments from the Shoreline Preservation Society on the 145th Subarea DEIS. We request Party of Record Status and Legal Standing on this matter and incorporate by reference any and all comments, documents, photos, staff reports presented now or in the past on this matter, including the 145th Corridor Study which is still in Draft, without an EIS.

We believe there is a high likelihood of severe adverse impact to the environment from the proposed 145th Subarea and Upzoning. The volume of materials and comments in this record, and the details that even the Planning Commission has not been made aware of is huge.

Given that and the constantly changing, and confusing Alternatives the Commission and staff have put out, which have not been fully comprehended by the public OR the Commission, we ask for an **Extension on the deadlines for commenting**.

As we've stated before, the Shoreline Preservation Society has since 2010 been a local, all-volunteer grassroots, WA State Non-Profit fostering the preservation of historical heritage, cultural and environmental assets throughout the Shoreline, WA Area. Our mission is "To educate Shoreline neighborhoods and disseminate information about impacts proposed changes due to rezones and other city or developer actions. To give residents the tools and opportunities to participate in the public process and provide alternatives as needed in order to preserve the character of our neighborhoods."

Today we would like to add some additional points and clarifications on our suggestions for making the best decisions on the future of the 145th Neighborhood. The City states in numerous place including its Comprehensive Plan and the previously passed SE Subarea Plan that the "character of neighborhoods is of Paramount Importance." And we agree.

While we know that some change is inevitable, "planning" for change should be done carefully and with maximum attention to protecting our environment as well as the wellbeing of our citizens and the "neighborhood character" they prize.

### **Affordable Housing**

The alternatives thus far being considered are not adequate to those values and goals. The area to be studied for the DEIS is a mile wide and contains about 3000 households. Those homes are mostly single-family. They are considered affordable both for new buyers and renters, but also for the thousands of families who've lived in them for decades. Many of the homeowners are seniors who've paid off their mortgages, so they are therefore extremely affordable. Displacing those people will be a bad outcome, and a potential violation of their civil rights. If "Affordable Housing" is built to replace perfectly adequate existing housing, there should be enough actual affordable unites to justify removal of these existing homes.

Another serious concern we have is the potential for loss of citizens' rights with regard to ability to comment and inform the City of potential environmental impacts of development projects, which will be proposed as a result of the rezones you, are considering. This could have a huge impact on the community and important environmental assets such as wetlands and open space in both Paramount Open Space and Twin Ponds Park. The size and scope of these wetlands, streams, steep slopes and recreational value has not been fully analyzed as yet. The potential for harm to these important watershed areas is great if there is not adequate opportunity to allow for full SEPA study. The Planned Action Ordinance would preclude the rights of the public to advocate for these assets.

Therefore we are requesting that the Commission and Council **decline to impose a Planned Action Ordinance on the 145th Subarea**. There is simply too much risk of details being missed in the DEIS which is not expected to study the impacts. There is supposed to be a “project level EIS”, but in the case of the 185th, it was not.

Overall we believe **that the 145th Subarea/Rezone** should preferably not include the areas surrounding Twin Ponds and Paramount Parks. The rezone should only be for areas that can reasonably be planned for and Capitalized in the budgets. (Please see the detailed letter for us from Dykes-Ehrlichman.)

### **Wetlands, Streams and Steep Slopes**

As we have detailed in comments previously we do not agree with the mapping of the Paramount Park wetlands and streams in the Addendum to the DEIS. The City’s own documents clearly show that the wetlands are recorded at 6.9 acres at Paramount Park.

The latest zoning map called the “Compact Community Hybrid” (one of many confusing alternatives now put forward by the City) shows an attempt by a Planning Commission Committee to change the zoning around the parks, in response to the community to R-6. We appreciate that effort, but we are obligated to protect some very sensitive areas on the West side of Paramount Park to recommend altering the zoning there to R-6 as well. The entire border neighborhood abutting the old Tenth Ave NE is a Critical Area or buffer. Steep slopes abut that whole corridor, and Littles Creek flows through 5 backyards there. And there are extensive wetlands and small creeks that flow in from the 10th Ave corridor which are not correctly identified in the Addendum mapping. These areas should be carefully delineated, and buffers applied. That would mean that all the homes along Tenth NE and Ninth Place NE should remain R-6. The area along Ninth Pl NE is also identified on City FEMA maps as a “Liquefaction Zone.”

There are at least three separate wetlands that the Light Rail Corridor will interfere with, as well as the actual corridor of the Thornton Creek. The entire corridor will be denuded of thousands of trees and those wetlands will be encroached and damaged. These areas **MUST** have adequate mitigation for the damage.

### **Wildlife Corridors**

Thornton Creek Alliance and other community members have provided extensive scientific information that the Single-family neighborhoods with existing trees and shrubs provide very valuable wildlife habitat for birds and other small animals. That is another very valid reason for preserving R-6 surrounding the parks.

Littles Creek and Thornton Creek are well known to be fish habitat. Culverts on these streams must be replaced to allow access to these stream corridors by state law. Littles Creek in Paramount Park Open Space has been described in the past as one of the best reaches of

creek in the entire watershed. Twin Ponds is well known to support fish and salmonids. Recently a river otter was sighted there. These are valuable wildlife corridors worth preserving.

Peverly Pond is an example of a lack of stewardship by the City of Shoreline. It was a viable open water pond and coho salmon habitat. It is now gone, replaced by a jumble of weeds due to lack of management of development of the Aegis Assisted Living projects. We do not want this to happen to our remaining wetlands.

### **Critical Areas Overlay**

As suggested in previous staff reports, we believe that a Critical Areas Overlay would be a good idea as an additional tool to protect these sensitive areas in Paramount Open Space and Twin Ponds Park.

### **Open Space**

The increased density that would come with the entire Compact Community Hybrid, even with some areas preserved for R-6 will adversely impact the available Open Space provided for this community. Paramount School Park is owned by the Shoreline School District. They have indicated a possibility that if the school age families increase with the proposed density from both 185th and 145th Light Rail Subarea Upzones, they may have to take back use of this extremely popular park. The density increases put a great deal of pressure on our existing parks, especially those with critical areas.

The City should include in this Subarea Plan a plan to fund Open Space/Park expansion over the next 20 years. This should include areas adjacent to Paramount Open Space, and Twin Ponds. It should also include improvements such as trails, invasive plant renewal, wetland restoration, and on Littles Creek there are several culverts, which must be, replace according to state law. What will the budget be for this?

### **Utilities and Infrastructure**

We want to remind the Commission of the costs to upgrade Utilities and infrastructure. This Rezone must contain detailed budgets and funding estimates that reflect the true costs to taxpayers for Surface Water, Sewer, Fire, Electricity, Gas and Water services. Much of the existing infrastructure is very old and must be brought up to code.

### **145th Corridor**

We believe there has not been adequate information supplied to the community or the Planning Commission on the 145th Corridor expansion. At a Special Meeting of the Planning Commission last Tuesday 4/5, it was stated that the actual data on traffic counts from the State Rt 523 onto Fifth Ave NE had not been supplied as yet to the Planning Commission.

The stated purpose of the one year delay for the 145th Subarea was to supply the Commission and community with adequate data and a plan on the Corridor improvement BEFORE the Subarea was voted on. The staff has stated that this information will not be available fully until the EIS is completed in two years. And yet staff states that there is in effect a Determination on Non-significance of the Corridor expansion.

A reasonable person living here, who will have to live with the impacts over the next decade would not agree with that assessment. Properties will need to be acquired, drainage improved, culverts replaced, the SPU Pumphouse may have to be removed, noise will affect the neighborhood, and above all traffic will increase, especially cut through traffic and parking in neighborhoods.

The 145th Rezone will have a huge affect on our community for decades. People will be displaced and we feel despair at the prospect or potential impacts to a beautiful single-family neighborhood and three beautiful parks.

That is unless the Commission takes action tonight to delay and reduce harm. Please do your best to protect our neighborhoods.

We respectfully request a delay of your decision due to the complicated options and lack of information and data that needs to be studied still.

Respectfully submitted,

Janet Way, President  
Shoreline Preservation Society

**Response:**

Housing, both in regards to existing character and to affordability, is addressed in Chapter 3.1 Land Use Patterns, Plans, and Policies and Chapter 3.2 Population, Housing, and Employment. Regardless of the alternative selected, it will be the market that addresses the types of housing stock needed to accommodate the population.

The environmental review process, from scoping to DEIS to DEIS addendum, has been subject to extensive public review and comment so that interested parties could address impacts arising from the proposed subarea. The City will comply with RCW 43.21C and its implementing regulations in regards to the adoption and implementation of a planned action ordinance if it elects to utilize that legislatively authorized tool for the subarea. The DEIS for this subarea may serve as the basis for that ordinance. The planned action ordinance, along

with the Subarea Plan and any necessary amendments to the City's existing regulations will be the subject of further review by both the Planning Commission and City Council. The City will provide notice for these actions as required by law.

Probably adverse environmental impacts to wetlands, streams, and wildlife habitat are addressed in Section 3.4 and supplemented with the DEIS Addendum. Future development of these areas will be subject to compliance with federal, state, and local law, including the City's Critical Areas Regulations, SMC 20.80. The analysis, on a site-specific basis, for any impacted critical area will occur at that time, including the delineation of wetlands and the hazard risk of slopes. The DEIS Addendum, as well as the City's own map, recognizes a small liquefaction area within the subarea.

No alternative proposes to reduce park acreage in either Paramount Open Space or Paramount Park. Therefore wildlife habitat will be retained. Chapter 3.5 addresses Parks and recognizes that increased density may require additional, enhanced parks and/or open space needs. Mitigation measures have been proposed to ensure the adequate provision of parks, including the adoption of a park impact fee imposed on new development.

The environmental impacts arising from the development of Sound Transit's light rail system, including tracks, station, and parking facilities, was addressed in the Lynnwood Link Extension FEIS, issued in April 2015. Mitigation measures for that project are set forth in that FEIS. The 145<sup>th</sup> Street Corridor Study has been completed and provided to both the Planning Commission and the City Council.

Impacts to infrastructure necessary to support development, including roads and utilities, is contained within the FEIS. See Section 3.3 Transportation and Section 3.7 Utilities. The purpose of an environmental impact statement is to address the probable adverse environmental impacts of a proposal. While an EIS can discuss the economic practicability of mitigation measures, it is not an economic impact statement and therefore is not required to contain a funding analysis.

***Responses to Spoken Comments during January 29, 2015 Planning Commission Meeting (Note: due to audio recording failure, public comments have been summarized from memory.)***

**Barbara Angersbach**

Stated that the planning has already been affected by growth along 15th avenue as the single family residences along her side of the street develop into Commercial or apartment buildings, changing the entire character of the neighborhood. Her father owns the house next door which they purchased when it was all single family parcels. The only other single family residences left adjacent to her home are rentals. She fears what will happen if the Fircrest property, which doesn't seem to be being used is sold off to developers and developed to the kind

of zoning heights being proposed in the subarea plans. As it is there is nowhere to park along 15th and walkability has declined due to the increase and speed of traffic.

She also wanted to make the project manager aware that Alternative 3 leaves her house out of the rezone area, whereas in the Alternative II map it IS included.

**Response:**

See response to your January 18, 2015 written comment.

**Steve Schneider**

Asked where the subarea plan came up with the number for current jobs within the subarea (1,600). Where are these people working? There are only a few businesses, and the rest of the subarea is currently only single family residences. Mr. Schneider spoke in favor of keeping building heights lower than what is proposed in the alternatives. He raised concerns that increasing density in the area will cause increased traffic, and pedestrian safety will be impacted.

**Response:**

Comments are noted. The number of existing employees is from the City's database and includes home based businesses and employment areas in the Traffic Analysis Zones that encompass the subarea. Also see City's Response to February 2, 3, and 19, 2015 written comments. See response to your February 3 and 19, 2015 written comments. For information specific to employment and traffic, please see FEIS Chapter 3, Sections 3.2 and 3.3, respectively.

**Krista Tenney**

Expressed concern about the impacts that the proposed rezoning will have on the neighborhoods in the subarea. The pictures representing the vision for the subarea do not contain any cars and traffic, which will be a byproduct of all of the change. She is also concerned about losing trees to development and hopes that attempts will be made to save all of them.

**Response:**

General substantive issues are addressed at the beginning of the chapter, specifically those related to cars and traffic. These subjects are also addressed in Section 3.3 of this FEIS.

**Yoshiko Saheki**

Said the Green Network Concept map in the DEIS shows non-existing trails in Twin Ponds Park and omits a trail that does exist. Although she understands this is a concept map, she believes the map's portrayal of Twin Ponds Park is misleading and this is repeated in other maps in the DEIS. That said, she appreciates the DEIS summary of Twin Ponds Park that acknowledges its wetlands and woods. No matter which alternative or a combination of alternatives is chosen, she said she hopes the park's natural environment will be respected.

**Response:**

See Sections 3.4 and 3.5 of this FEIS for more information about Twin Ponds Park and the Green Network.

**Charla Venturi**

Pointed out traffic concerns throughout the Ridgecrest neighborhood that will be worsened with additional people coming to the area. The traffic on 155th and 5th has increased and causes people to seek shortcuts through 6th Avenue.

**Response:**

See Section 3.3 for more information regarding traffic.

***Responses to Spoken Comments Received during February 2, 2015 City Council Meeting*****Wendy DiPeso**

Shoreline resident, read a statement regarding citizens' anger over 185<sup>th</sup> and 145<sup>th</sup> Street Subarea proposed rezone. She talked about the Council redefining the Subarea Station Areas. She asked Council to listen to the citizens, reexamine the plan, slow down the process and allow opportunity for the Community and the City to craft a better plan.

**Response:**

See "Request to delay decision-making" under the Common themes to DEIS comments at the beginning of this chapter.

**Myrna Haigh**

Expressed appreciation for Planning Commission's single family development recommendation. She stated that the process is not understood by the average citizen and that the first priority of Council should be negotiating with Sound Transit on parking issues. She stated there is no need to be in a hurry.

**Response:**

See response to your February 5, 2015 written comment.

**Dan Jacoby**

Recommended slowing down decision making on 185<sup>th</sup> Station Subarea Plan. He commented on the addition of new maps, listed issues that have yet to be addressed, and stated the decision should be postponed until these issues are resolved.

**Response:**

See response to your January 26, 2015 written comment.

**Janet Way**

Commented on the schedule, timeline, and need for public participation for the Lightrail Station Subarea Planning. She talked about WRIA 8 Projects and the City's responsibility to protect the watersheds. She commented on the need to mitigate the increase in surface water at full build out to protect the salmon, and recommended slowing down the process.

**Response:**

See responses to your February 5, 2015; and March 17 and 21, and April 7, 2016 written comments.

**Ginny Scantlebury**

Commented on the need to have the 185<sup>th</sup> Street and 145<sup>th</sup> Street Station Subarea Planning discussions in separate meetings. She talked about replacement of the Shoreline Center Complex Sport Fields by MUR-85 developments, and the destruction of single family homes in the Cromwell Park neighborhoods with MUR-45 developments.

**Response:**

See response to your February 2, 2015 written comment.

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## ***Responses to Spoken Comments during February 5, 2015 Planning Commission Public Hearing on DEIS***

### **Dan Dale**

Cautioned that one of the biggest pieces missing from the processes for both of the station subarea plans is Sound Transit's Final Environmental Impact Statement (FEIS), which will be released in April. He suggested that decision making related to the 185<sup>th</sup> Street Station Subarea Plan should be postponed until after Sound Transit's FEIS has been released. In addition, the 185<sup>th</sup> Street Station Subarea Plan FEIS should also be intertwined with the 145<sup>th</sup> Street Station Subarea Plan DEIS as it moves forward. He emphasized the need to work together to get as close to the best situation as possible.

### **Response:**

Information from the 185<sup>th</sup> Street Station Subarea Plan was incorporated into analysis in this FEIS.

### **Tom McCormick**

Voiced concern about the potential traffic problems associated with the proposed development at Point Wells. The proposed development at Point Wells would increase the number of vehicles crossing the county line via Richmond Beach Drive from 300 to 12,000. This will have a significant impact on the people who live on the street who are used to a very quiet neighborhood. He said the same concern holds true for those living near 145<sup>th</sup> and 185<sup>th</sup> Streets, where traffic is expected to increase dramatically. These traffic increases are not something the community wants or should tolerate. He said he has proposed a Comprehensive Plan Amendment that would add the following provision: *"The following average trip limits will apply to local streets and collector streets. The default average daily trip limit would be 1,500 vehicles per day, but Council would have authority to go up to 3,000."* This would be a hard limit, and future development proposals that create traffic beyond the limit would be rejected. The citizens want to take back their streets. They need certainty that traffic will not significantly increase over time.

### **Response:**

See Section 3.3 for more information about traffic. Potential impacts from the proposed development at Point Wells were considered as part of traffic modeling for this FEIS.

## John Behrens

Referred to a letter the Commission received earlier regarding affordable housing. The letter referenced a newspaper article written a decade earlier and criticized the 10-year plan that was launched in 2005 to end homelessness. The plan committed to a dramatic increase in spending of low-income and homeless assistance programs. A committee to end homelessness was established to implement the plan and was primarily run by elected city and county officials, as well as big shots in the non-profit sector and corporate giving world. While the letter indicated an appreciation for the increased attention and dollars pledged to the growing problem, it said the plan lacked any commitment or policies to prevent the continued loss of the existing stock of low-income housing. For example, Mr. Behrens pointed out that two trailer parks were recently replaced with new apartment complexes. These trailer parks provided opportunities for affordable housing that are now gone.

Mr. Behrens said the letter points out that even if the plan fulfilled its goal to add 9,000 low-cost units countywide over the period; for every one unit created, three to four units would be lost to demolition, condo conversion and increased rents. Given that committee membership included many with ties to developer interests, the letter suggests it was unlikely that the plan would ever address the issue of displacement. Since 2005, the 10-year plan takes credit for adding about 6,000 housing units countywide; but in Seattle alone, over the same period, over 6,500 low-income apartments have been demolished, another 3,000 were lost to condominium conversion, and at least 6,000 were lost to speculative sale and rent increases. Thousands more were lost in the rest of the county due to these forces. The letter emphasizes that today homelessness has reached record levels (up 13% in 2013 and 20% in 2014). County and city leaders won't acknowledge that the plan has failed and refuse to link the problem to the continuing loss of existing units and gentrification. Instead, they've extended their plans out indefinitely.

Mr. Behrens commented that in just one year, King County and Seattle spends \$45 million on homeless issues; which is enough to give each homeless person \$15,000 per year. He suggested that the county and cities need to use the funds smarter, and he shared the following ideas:

- Require developers who demolish low-income housing to replace 1 for 1 the units they remove at a comparable price, and impose a citywide moratorium on demolitions until this provision is adopted.
- Create a housing preservation commission to inventory the remaining stock of privately owned, low-income buildings at risk of being lost, and recommend strategies for quick acquisition of these buildings. Include existing single-family homes, which rent at affordable rates.
- Inventory unused public lands and make them available for low-income housing development. This gives people free land to build on.

- Establish a growth-related housing fund and dedicated 20% of the incremental increase in property tax revenues from new construction citywide to development of low-income housing.
- Adopt developer impact fees to replace tax subsidies granted to developers.

**Response:**

See response to Janet Way's January 31, 2015 written comment regarding this issue.

**Tom Jamieson**

Commented that the City's impact fee ordinance went into effect on January 1, 2015, but all development permit applications submitted prior to that time are not be subject to the provisions of the ordinance. There is incentive for these developers to wait until rezoning occurs to move forward with their projects; and it would be in their best interest to rezone the areas as quickly as possible so they can avoid the impact fees. He expressed his belief that the City should not rush the subarea plans in order to accommodate existing or anticipated development applications. Rather, the rezones should occur in the best interest of the City. He voiced concern that small movements might be overlooked by the public because they are focusing on the big picture and their own particular parcels. He asked the Commission to confirm whether or not revisions to the plans are being done in the special interest of particular developers and/or applications or legal challenges.

**Response:**

Comment noted.

**John Kropf**

Commented that 21<sup>st</sup> century transportation is being overlooked completely. The plan provided by Sound Transit was born in 1980 and provided more capacity than what the current plan is proposing. He submitted information for the Commission to consider and asked that they pay particular attention to 145<sup>th</sup>, which is a very congested area. Light rail coming through will make it worse.

**Response:**

See responses to your February 1 and 16 written comments.

**Jeff Eisenbrey**

Said he lives in the area that would be impacted by the 145<sup>th</sup> Street Station Subarea Plan. He expressed his belief that the station would make more sense in other areas of the City where the zoning already exists to support development. For example, the 145<sup>th</sup> Street and 15<sup>th</sup>

Avenue areas have high density as opposed to the proposed location across the street from a golf course and the most expensive private school in the state. He expressed concern about aggregation of properties. He has observed growth in and around the Seattle area for years, and the buildings that tend to be constructed where aggregation occurs are grandly out of scale with the entire neighborhood. It takes time to build while aggregation is happening and the properties in and around the development sites become blighted. If the area around the station is rezoned, he has to wonder whether or not he should fix his roof. Maybe someone will offer him a lot of money for the property and his home will be torn down. Anything they can do to limit the number of players would be helpful; taking the multi-million dollar corporations out of it and placing the development in the hands of small scale developers and private land owners who are already in the City. He referred to the Eastlake area of Lake Union as an example of slower-paced development that is resulting in a broad mixture of architectural styles and small, pedestrian-friendly businesses.

**Response:**

See response to your February 5, 2015 written comment.

**Brian Derdowski**

Noted that while not a resident of Shoreline (from Issaquah), he had been coordinating with other residents of Shoreline to support their interests. He indicated he would submit written comments by the February 17<sup>th</sup> deadline and suggested it would not be appropriate for the Commission to make their recommendation before the close of the comment period. He referred to a picture of the 145<sup>th</sup> Street Station Subarea. He noted that although half of the subarea is located within the City of Seattle, nowhere in the DEIS is there mention of the City of Seattle's concerns. There is no mention of the 145<sup>th</sup> Subarea in the 185<sup>th</sup> FEIS, either. He emphasized that these two gigantic rezones for the same purpose are just a short distance from each other, and it is a violation of a number of principles established by the State Environmental Policy Act (SEPA) not to look at the two plans together. At this late stage, he suggested the best approach would be for the City to halt the FEIS for the 185<sup>th</sup> Street Station Subarea and do a supplemental that incorporates the 145<sup>th</sup> Street Station Subarea, and then start a supplemental for the 145<sup>th</sup> Street Station Subarea DEIS that references the 185<sup>th</sup> Street Station Subarea.

Mr. Derdowski explained that an EIS for a planned action needs to be much more rigorous than an EIS for a subarea plan because once a planned action is adopted, there is no additional SEPA review. The detail of environmental review in the 145<sup>th</sup> Street Station Subarea DEIS is actually less than many of the subarea plans he has looked at that do not purport to address project-level impacts. Since project-level impacts are not being addressed in the DEIS, SEPA should be applied to future projects. He suggested one way to address this problem is to have the preferred alternative move to the FEIS stage as both a planned action and subarea plan rezone, thus allowing the Council a choice. Another option is a "potential zone," where the underlying zoning would stay the same and the "potential zone" would be the recommended zoning. In order to get that zoning, there would be specific triggers, and the applicant would apply to actualize the zoning.

Mr. Derdowski commented that the proposed subarea plan uses a form-based zoning concept, which makes it even harder to identify impacts because the specific uses cannot be identified. In talking to experts and nationally-recognized advocates of form-based zoning, he learned that Albuquerque used form-based zoning for its transit rail corridor and it was a disaster. He also learned that “going out into the neighborhoods with form-based zoning would be a huge mistake,” and that the best use of form-based zoning is incremental and backed up by strong regulations that create a public realm with ample investments in public amenities and services.

Mr. Derdowski said another reason for requiring future projects to go through SEPA is so the City can apply special conditions of approval based on project-level impacts. He reviewed that the City’s regulatory authority has two components: the development code and SEPA. Under SEPA, cities can identify adverse environmental impacts and impose special conditions. He also reviewed that the current vested rights law is extremely pro development. If the City wants to adopt a stronger stormwater regulation, impact fee, etc. in the future, they run the risk, if zoning is already in place, of developers rushing to vest. If this were to occur, the City would have no development regulations or zoning conditions in place, and SEPA would not apply, either. He summarized that preserving the opportunity to apply SEPA is something the City can do, and most of what they want to accomplish can be done via a subarea plan.

Mr. Derdowski pointed out that all three alternatives assume that the proposed light rail station would be constructed, along with a park-and-ride structure for 500 cars and other improvements in the vicinity of the station. What happens between now and the completion of the station is one of the real defects in the plan. As the Commission considers the phasing options, he asked them to consider triggering events instead of dates. The EIS should evaluate what the impacts will be over time. In order to turn the City’s long-term vision into a plan, the impacts must be studied to a greater degree. He expressed his belief that many of the assumptions set forth in the DEIS, particularly the road impacts, are very speculative.

In order to protect the City’s interest, Mr. Derdowski recommended the rezone be adopted as a subarea plan. He recalled that at the hearing on the 185<sup>th</sup> Street Subarea Plan FEIS, staff appeared to suggest that proposed projects would not go through a traffic concurrency analysis. He hopes this is a misinterpretation because it would clearly be a violation of state law. It absolutely takes his breath away that an up zone of this magnitude is being proposed with such a “sketchy” traffic analysis and with a Capital Improvement Plan that is highly speculative, unfunded, and not disciplined with a concurrency analysis. At the very least, the City should do a model run, plugging in background development, etc.

Again, Mr. Derdowski said he plans to submit written comments, and he suggested the Commission consider accommodating panel-style discussions. People are organizing and working hard, and they deserve to have longer conversations with the Commission. This will save a lot of time and heartbreak in the future.

**Response:**

Comments are noted. The City of Seattle was provided a copy of the DEIS but has provided no comment. The FEIS acknowledges concurrent projects, including the adopted 185<sup>th</sup> Street Station Subarea Plan, and the resulting impacts and mitigation measures for the two subareas are being considered concurrently. The City will comply with RCW 43.21C and its implementing regulations if it elects to adopt a planned action ordinance for the subarea that would subject planned action projects to specific mitigation measures as well as compliance with the City's regulations, including those related to concurrency. The 145<sup>th</sup> Street Station Subarea EIS would serve as the EIS for this ordinance.

The City has not identified, nor does it intend to, a preferred alternative in the EIS. The FEIS contains an analysis of impacts based on a two-stage, year-based phasing approach, providing certainty for both property owners and developers.

Transportation is addressed in Chapter 3, Section 3.3. Stormwater is addressed in Chapter 3, Section 3.4. The methodology utilized for the analysis of both transportation and stormwater is an industry acceptable methodology and results in a well-reasoned analysis of the impacts. The provision of two action alternatives (now three in the FEIS) along with a no-action alternative provides a range of reasonable alternatives for the purpose of analysis, with varying development intensity for each.

Please see 185<sup>th</sup> Street Station Subarea FEIS, Chapter 4 Response to Comments in regards the incorporation of those comments.

**Heather Murphy Secrist, PhD**

Said she and her husband moved to Shoreline in 2010. They fell in love with the Ridgecrest Neighborhood, with its friendly, family appeal, as well as trees, parks, movie theater, local coffee shop, and wide streets with plenty of parking. It had all the benefits of a small town, while still being next to the big city of Seattle. She read the flyers that were sent out and was excited to have the light rail come to 145<sup>th</sup> Street. While the flyers indicated the change would affect where she lived, they did not clearly express just how much things would change. It was only when her husband did a walk through that she began to understand. While attending the meetings last fall, she was shocked to see that the plan was to take her lovely, small-town feeling home and turn it into the next big city with giant high rises up to seven stories tall.

Dr. Murphy Secrist said her fellow neighbors have expressed similar feelings that they do not want the proposed change. Many people spoke about having options that were not as drastic as the zonings in Alternatives 2 and 3; and many said they liked Alternative 1 with no changes. A member of the planning staff responded to that by saying Alternative 1 would not work because the light rail would bring change. She agreed that change is coming, but she questioned why they need to lay out the red carpet for it. Why do they need to make

such drastic rezones to the City all at once to accommodate the light rail? The neighbors do not fear change simply because it's change. They fear planned changes that will destroy what they love about the city they call home. She expressed her sincere hope that the Commission will hear that the citizens want a slower phasing of the zoning in order to ensure the best possible result in the end. She asked the Commission to find a way for light rail to be a positive addition and not a destructive force.

**Response:**

Comments are noted. Chapter 1 and the Public and Stakeholder Involvement Plan (Appendix) detail the public process for the 145<sup>th</sup> Street Station Subarea. The FEIS considers phasing for all action alternatives. See also City's Response to written comments submitted on February 4, 2015, and to March 21, 2016 written comments.

**Cory Secrist**

Said his understanding is that the main impetus of the rezoning plans are light rail and affordable housing, which are both noble goals; and the City is looking at the rather radical and experimental ideas utilized by the City of Seattle to figure out a way to deal with population growth and the need for more affordable housing and mass transit. He voiced concern that the proposed zoning is in excess of what would be needed, as it does not appear the proposed light rail system will offer enough seats on trains to accommodate the amount of people that will come into the City based on the proposed, large scale rezones.

While Dr. Secrist agreed that affordable housing near the station makes sense, he questioned the numbers in the DEIS. For example, the proposal would offer a property tax exemption to developers if at least 15% of the units in a multi-family complex are affordable at 70% Average Median Income (AMI). He pointed out that the AMI in Shoreline is \$66,576, which means that 70% of AMI is \$45,533. The projection is usually based on 1/3 of a person's income being used for rent, which means that apartments that rent for \$1,279 per month would be considered affordable. These units would be affordable to the lower middle class, but not what people typically think of as low-income. He reminded the Commission that, according to the numbers in the DEIS, 13.9% of the City's population falls within the low and very low income groups, and these individuals would not benefit from the affordable housing provisions outlined in the plan.

Dr. Secrist voiced concern that the massive rezone would essentially push people out of their homes and could cause property values to go down because of blight. Over time, the middle class will be in apartments instead of the single-family homes they are in now and the lower class will be pushed into the micro apartments and apartments that are sprouting up in the Puget Sound region, including along Aurora Avenue North in Shoreline. He summarized that the plan will not be good for affordable housing, and the City can likely fill the light rail trains with the current population.

**Response:**

Comments are noted. Affordable housing is addressed in Chapter 3, Section 3.2 Population, Housing, and Employment. The Lynnwood Link Extension FEIS, issued April 2015 by Sound Transit, analyzes the purpose and need for the light rail system, including the 145<sup>th</sup> Street Station and passenger expectancy. The FEIS reflects the issuance of Sound Transit's EIS. The provision of affordable housing to all economic sectors is set forth in the City's Comprehensive Plan and the City has varies regulations to facilitate the siting of such housing for all sectors based on the King County Average Median Income; a well-established standard of measuring affordability based on both federal and state law.

Chapter 2 Description of Alternatives discussed how alternatives were developed through an intensive public process. A third action alternative – Alternative 4 Compact Community Hybrid – was developed based on subsequent public comment. These alternatives along with the no action alternative provide a range of reasonable alternatives for the purpose of analysis. The concept of phasing for each action alternative is discussed in the FEIS.

Also see responses to your February 18, 2015 and March 21, 2016 written comments.

**Pat Kenney**

Pointed out the need for adequate transportation to and from the station. There also needs to be a bridge for pedestrians, bicycles, and motorized scooters/chairs for those who cannot walk a far distance. She likes the “green corridor” concept, but the Commission should be aware that the pictures stop at 145<sup>th</sup> Street, and there needs to be a wide pathway across the highway. While the City anticipates that Sound Transit will fund this access, they should wait to make sure it gets done. She asked the Commission to take specific note of the proposed pathway starting on 150<sup>th</sup> Street and going west to 152<sup>nd</sup> Street. She noted that the pathway near 152<sup>nd</sup> is muddy, there is very little light, and cars are often parked there. She said she supports planning ahead to avoid sprawl and uncoordinated growth, but she is concerned about the impact the rezone will have on the existing residential homes. She noted that a number of places in Seattle have boarded up homes, and she would hate to see this happen in Shoreline. She likes the idea of phasing in the zoning, but there should be an opportunity to reexamine the zoning at certain intervals. Lastly, she asked the Commission to delay its decision to include Sound Transit's FEIS.

**Response:**

Comments are noted. Chapter 3, Section 3.3 of this FEIS addresses multi-transportation including pedestrian and bicycles, and all action alternatives incorporate a “Green Network” concept. Chapters 3.1 and 3.2 address market forces and housing needs for all alternatives,

including the No Action Alternative. Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact. Sound Transit's EIS sets forth mitigation measures related to passenger needs. The City's FEIS considers phasing for all action alternatives. Also see "Common themes for DEIS comments" at the beginning of this chapter, specifically "Request to phase zoning" and "Request to delay decision-making."

### **Carolyn Creighton**

Said she has lived in Shoreline for 39 years. She asked the Commission to slow down the process. She also expressed concern that many of the property owners still do not have a clear understanding of the proposed changes. The City should make more effort to get the word out and provide a clearer explanation of how the proposed changes can impact residents.

#### **Response:**

Comments are noted. Chapter 1 and the Public and Stakeholder Involvement Plan (Appendix) detail the public process for the 145<sup>th</sup> Street Station Subarea. Per City Council direction, the 145<sup>th</sup> Street Station EIS process was suspended until completion of the 145<sup>th</sup> Corridor Study with additional opportunities for public involvement available. Also see "Common themes for DEIS comments" at the beginning of this chapter, specifically "Request to delay decision-making."

### **Ginny Scantlebury**

Said she has lived in the City since 1982. She briefly reviewed the extensive community process that took place when the City adopted its first 20-year Comprehensive Plan in 1995. She questioned what happened to the City's staff and Council over the past 20 years, as they now appear to make decisions first and then ask what the residents want. She questioned why the staff does not provide the citizens with all the details of the proposals. She asked the Commission to consider citizen requests over the past year to slow the light rail plans down. She said she has not heard one resident voice support for the proposed high-density zoning plans. Instead, they would like slower, more controlled growth. She noted that residents have voiced concern about how the plan would impact roads, schools, utilities, and police. Once the zoning is in place, developers will be ready to start building in the new MUR-35', MUR-45' and MUR-65' zones; and the character of the neighborhood will be lost. The current residents do not want a city like Fremont, Ballard or Lake City. She said she prefers Alternative 1. However, she would also support a phased-in plan that is somewhere in between Alternative 1 and Alternative 2.

#### **Response:**

Comments are noted. Chapter 1 and the Public and Stakeholder Involvement Plan (Appendix) detail the public process for the 145<sup>th</sup> Street Station Subarea. Chapter 2 provides descriptions for each of the alternatives, including the new alternative arising from public comment –

Alternative 4 Compact Community Hybrid. The FEIS considers phasing for all action alternatives. Noted that support is for No Action Alternative or a phased Alternative 1/Alternative 2 configuration. See also City's Response to written comments submitted February 2, 2015. See Sections 3.3, 3.6, and 3.7 for more information about how potential zoning scenarios analyzed in the FEIS could impact roads, schools, utilities, and police. The potential to phase zoning is analyzed throughout the FEIS.

### **Sigrid Strom**

Said she participated on the citizens committee that worked on the Southeast Subarea Plan in 2008 through 2010. She voiced concern that the current process is flawed, and she urged the Commission not to make a decision until they have received all of the public comments. She also encouraged them to slow down the process. She noted that none of the elements that were identified as important to the residents in the Southeast Subarea Plan were incorporated into the proposed new plan. She recalled that the plan included a lot of details about valued community characteristics, an inventory of who and what was there, and current problems and potential impacts related to transportation. It included a green corridor, which is also in the Comprehensive Plan. Again, she urged the Commission to take more time. She particularly asked them to review the original Southeast Subarea Plan and the community values it identified. These values are consistent with the comments the Commission is currently hearing from the citizens.

#### **Response:**

See response to your February 19, 2015 written comment.

### **John Behrens**

Pointed out that there is a Carmelite Convent on 145<sup>th</sup>, which provides a treed, private, quite place that is important to the corridor. This property is also included in the proposed rezone. It is not likely that the owners of this property will approach the Commission to speak on their behalf, but the City owes it to them to let them know what is going on and attempt to get their feedback.

#### **Response:**

Comment noted.

### **Thomas Poitras**

Said he supports Alternative 3, for a compact community with no added-on corridors. He also supports a phasing approach where feasible. Neighborhoods within that area which are not curtailed for early population density increases to support light rail should not be opened up for development until they are needed. Those neighborhoods should be spared the unnecessary anxiety associated with what they perceive

to be unfettered and uncontrolled development around them. Neighborhood residents have voiced concern about the loss of quality of life and property values if something unpleasant is built near them.

Mr. Poitras reminded the Commission that the stated purpose of the corridors is to increase business activity and connect existing large commercial areas. If this were true, he suggested there would be more corridors included, some of which would be better suited to accomplish that purpose. For example, 15<sup>th</sup> Avenue Northeast could be extended from 155<sup>th</sup> to North City, connecting North City with the substantial business district at 145<sup>th</sup> Street and 15<sup>th</sup> Avenue. An upgraded 145<sup>th</sup> Street could connect Meridian Avenue to Ballinger Way, with access to the very busy shopping center at Aurora Village. Also, 165<sup>th</sup> Street from 5<sup>th</sup> Avenue to 15<sup>th</sup> Avenue could be up zoned to connect the cluster of shops near the Crest Theater to North City. The business center near the Crest Theater is at a commercial dead end. It does not commercially connect to North City and it has not been suggested that it should be commercially connected to 165<sup>th</sup> Street. Although the initial corridor version had up zoned around 8<sup>th</sup> Avenue and 165<sup>th</sup> to potentially support these businesses, the possibility was abandoned with no explanation. The benefits of making 5<sup>th</sup> Avenue a connecting corridor from 155<sup>th</sup> Street to 165<sup>th</sup> Street, as currently configured, seem minimal at best and not worth disrupting the lives of the people who live there, including putting their property values in jeopardy. There are many types of businesses that would devalue any home that was next to them, and the code does almost nothing to prevent that from happening. This would be true of all rezoned arterials, and not just 5<sup>th</sup> Avenue.

Mr. Poitras questioned if a study has been conducted to provide an educated guess as to how many jobs would likely be created on the 5<sup>th</sup> Avenue or 155<sup>th</sup> Street corridors and how much they would increase Shoreline's economy for the next 10 to 15 years. He expressed doubt that the impact would be significant. A more likely scenario is that the corridors would be degraded by cheap home conversions to marginal small businesses. Although home conversions are supported by some City officials, home degradation would inhibit good growth for the future. The City needs smart, inviting streetscapes that people can be proud of.

**Response:**

Comments are noted. Supports Alternative 3 with no added corridors for the 145<sup>th</sup> Street Station Subarea. See Chapter 3, Section 3.3 for an analysis of Transportation impacts and includes the 145<sup>th</sup> Street Corridor Study. Chapter 3, Section 3.2 Population, Housing, and Employment speak to market forces and job creation under each alternative.

**Liz Poitras**

Said that while she does not advocate that the City slow the process down, it would be very beneficial for a City official to very clearly state the reason for the current timeline and the consequences of not meeting the deadlines. She said she is in favor of Alternative 3, with no added corridors for the 145<sup>th</sup> Street Station Subarea. Alternative 2 would connect corridors by spreading out the potential for

redevelopment, but it would also spread out the need for costly infrastructure changes. As stated in the DEIS, Alternative 2 would require the most utility and transportation improvements and upgrades. It would also require the highest level of public services to serve the proposed growth because the alternative, at build out, would cover a greater geographic extent than Alternative 3.

Ms. Poitras said Alternative 2 may also make it more difficult to assess the actual results of the new MUR zones and Development Code changes. The projects may be widely scattered, and problems in the code may not be apparent early on. Even with all the hard work the Planning Department has put into changing the Development Code for the MUR zones, we will probably witness many unintended consequences, such as the parking problem at the Polaris Development.

Ms. Poitras noted that Alternative 2 provides far less potential for affordable housing than Alternative 3. If increasing affordable housing is one of the City's goals, Alternative 3 should be chosen. Most of the area in Alternative is covered by MUR-35' zoning, which has no requirement for affordable housing. If early developers in the MUR-45' zones choose fee-in-lieu-of, the City could end up with little or no alternative housing when the station opens. As stated in the DEIS, Alternative 3 would provide more housing opportunities than Alternative 2.

Poitras said the DEIS identifies some of the increases in traffic in the area, and they will be substantial. As stated in the DEIS regarding traffic in Alternative 2, North/Northeast 145<sup>th</sup> Street, North/Northeast 155<sup>th</sup> Street, Meridian Avenue North, 5<sup>th</sup> Avenue Northeast and 15<sup>th</sup> Avenue Northeast would all experience a large increase with growth between 40% and 150% as compared to the no action alternative. The numbers for Alternative 3 are 40% to 140%. She noted that 1<sup>st</sup> Avenue Northeast, 8<sup>th</sup> Avenue Northeast, and 10<sup>th</sup> Avenue Northeast were not explicitly analyzed in the DEIS. Adding more corridors will result in more traffic everywhere due to the additional commercial and retail development and not all the customers will arrive on foot. For these reason, she supports Alternative 3.

**Response:**

Comments are noted. Stated preference for Alternative 3. Note that additional analysis is provided in the FEIS on traffic related to Alternative 4. See Chapter 3, Section 3.3.

**T.J. Hogan**

Said he was shocked to learn about the radical changes being proposed, and he implored the City to slow down the process. He expressed support for Alternative 1, which is to do nothing until they slow down and take a better look at the area. Much of Alternatives 2 and 3 is based on pure speculation on what the City thinks will happen, but they don't know what will happen in the future. The proposed rezoning would tie the City's hands in the future, which is not wise.

**Response:**

Comments are noted. Supports Alternative 1 – No Action Alternative. The purpose of the environmental impact analysis process is to provide information about alternatives, as well as to analyze the potential impacts related to alternatives and to develop recommended mitigation measures to address the impacts.

**Judy Nelson**

Urged the City to take more time, as many people are just finding out how their properties will be impacted. She expressed her belief that any changes or development should be done in steps. This is a large project, and there is potential for many missteps. As an example, she referred to the ongoing expansion of the Evergreen School on Meridian Avenue, where transportation impacts were not adequately planned for and neighbors have repeatedly complained to the City over problems. If this somewhat small project was not planned for adequately, she questioned how the Commission can be sure that this humongous project is being planned for adequately. She asked the Commission to postpone their decision until after Sound Transit has issued its FEIS in April. She also questioned if Twin Ponds should be identified in the plan as a wetland that needs more study.

**Response:**

See Sections 3.3 and 3.4 for more information about potential transportation impacts and mitigations, and Twin Ponds Park and wetlands.

**Steve Schneider**

Said he and his wife live in the upper Pelican Park Neighborhood of 8<sup>th</sup> Avenue Northeast and Northeast 150<sup>th</sup>. He referred to a letter he submitted previously regarding his concerns. He said he and his wife are in favor of a thoughtful, slow, limited-phase rezone that does not destroy the character of the community they love. They felt the area should remain predominantly single-family homes. It is critical to keep in mind that once the planned action ordinance is adopted, future projects consistent with the ordinance would not be subject to further environmental review under SEPA. A planned action ordinance presupposes that the initial environmental review is thorough and sufficient; but in this case, the project's environmental review fails in fundamental ways. The DEIS concludes in several sections that no significant, unavoidable, adverse impacts would be anticipated; in part because incremental growth will allow the City to monitor and address the impacts over time. He expressed his belief that this type of analysis is inappropriate when the planned action process is intended to limit future review of environmental impacts because the initial review is thorough. He said the DEIS is a review full of guesses, which punts the problems into the future. Moreover, he said there is no way to determine that the growth will be slow or incremental, and there is no guarantee that the City will have the will or the funds to respond to future adverse impacts. The DEIS acknowledges that funding for improvements to serve growth is not secured. He expressed support for the criticisms voiced on many occasions about the inadequate review and mitigation of traffic, parking, surface water runoff and other issues, and he asked the City to slow down the process.

**Response:**

Comments are noted. The FEIS considers the concept of phased zoning for all of the action alternatives. The City will fully comply with SEPA, 43.21C RCW, and its implementing regulations if it elects to adopt a planned action ordinance for the 145<sup>th</sup> Street Station Subarea. The FEIS will serve as the EIS for that ordinance. Chapter 3 provides an updated analysis for impacts including, Chapter 3, Section 3.3 addressing transportation impacts and incorporates the 145<sup>th</sup> Street Corridor Study; Chapter 3, Section 3.4 addressing stormwater; Chapter 3, Section 3.7 addressing utilities. The FEIS must analyze the probable adverse environmental impacts of a proposal, it is not an economic impact analysis. Also see City's Response to February 2, 3, and 19, 2015 written comments. Also, see responses to your February 3 and 19, 2015 written comments.

**Cathy Floit**

Said she and other citizens are present because they believe the process and comment period have meaning; and the Commission has shown that is true. She commented that her home in the Pelican Park Neighborhood is her sanctuary that is threatened by the proposed plan. She considers her neighborhood to be diverse, and she does not see how this could continue under the proposed alternatives. The neighborhood is affordable and most of the homes are owner-occupied. The owners of the new condos and apartment buildings will likely charge their tenants far more than the mortgage the current single-family homeowners pay. Although they welcome low-income housing, none of them would qualify. They seem to be caught in the middle with no place to live. They are gardeners and love their outdoor space. They frequent the farmer's markets in summer and enjoy growing their own fruits and vegetables, as well. They need sunlight for that and for their own mental health. They are out on beautiful sunny days enjoying the neighborhood, and the thought of multi-story buildings blocking them in is depressing. They love their parks, trees, and the amazing wildlife in the neighborhood. She asked the Commission to please maintain the neighborhoods.

**Response:**

Comments are noted. Chapter 1 and the Public and Stakeholder Involvement Plan (Appendix) detail the public process afforded the EIS process for 145<sup>th</sup> Street. Chapters 3.1 and 3.2 addresses market forces and housing opportunities under each of the alternatives, including the No Action Alternative. Also see City's Response to February 3, and 19, 2015 written comments.

**Shirley Parker**

Said that her property in the Upper Pelican Park Neighborhood would have no sunlight if the City adopts a plan that allows seven-story buildings. She loves to garden, but her property would be completely shadowed. She raised her family in the home, which is paid for. She won't be able to live anywhere else when she quits working, as she would be unable to afford \$1,200 per month for rent. She lives in what

she considers low-income housing. While she supports light rail, she asked that they not destroy the neighborhoods and keep the single-family homes.

**Response:**

Comments are noted. Also see City's Response to February 2, 2015 written comments.

**Dan Jacoby**

Observed that the freeway exits in Shoreline are at least 7/10 mile from the main business corridor, Aurora Avenue North. Clearly, this part of the freeway was designed not for commerce, but to bring people from their homes in Shoreline to their work in Seattle and back. The light rail is obviously planned to relieve increasing congestion on the freeway, and choosing to more than double the number of housing units in these two areas would defeat the purpose. With a crowded light rail, the City would merely be adding an uncomfortable way to get to work to an unreliable way to get to work.

Mr. Jacoby pointed out that the Puget Sound Regional Council's (PSCR) population forecast for 2040 projects an average annual increase of 1.2% for the region, which is over 50% higher than census projections for the whole country. The planned rezones are based on projections for Shoreline that are 60% higher than the region or 2.5 times the national average for decades. Given the long-term impossibility of predicting business and economic cycles, new technologies and generational shifts, he suggested the numbers are meaningless. He questioned why the City is planning for massive growth 60 to 100 years into the future.

Mr. Jacoby suggested that the Commission recommend to the City Council that they select the no-build alternative for 145<sup>th</sup> Street. Alternatively, they could recommend the opposite of what happened with 185<sup>th</sup> Street where there was suddenly a large up scaling of even the largest proposed alternative. This time, they could create a dramatically downsized alternative. He volunteered to help the planning staff create this new alternative, which would send a clear message that the process is heading over a cliff and the City needs stop, take a breath, and head in a new direction.

**Response:**

Comment noted.

**Yoshiko Saheki**

Said she lives within the subarea and the "no action" alternative (Alternative 1) does not make sense to her. As a lay person, it seems that future growth in Shoreline should be directed and guided rather than be left primarily to market forces. At the same time, the idea of

placing more density closer to the station does not make sense because the subarea is not a blank slate. Imposing density just based on nearness to the station ignores the existing established neighborhoods, current conditions elsewhere, and existing infrastructure.

Ms. Saheki recalled that at the Commission's last meeting, someone living along 15<sup>th</sup> Avenue Northeast asked to be included in the subarea because her home is one of the few single-family residences left on her block. The Commission listened to this request and extended the subarea boundary to encompass her block. This is one example of how the Commission and the process may have overlooked existing conditions in Shoreline. For example, on the other side of Interstate 5, the widest streets are Aurora Avenue North and Meridian Avenue. It seems that those streets could accommodate more density than 1<sup>st</sup> Avenue Northeast, which currently doesn't have sidewalks and could never hold two lanes of traffic in each direction. She recognized that improvements would come with density, but it would be smarter to have the first planned higher density along streets that already have the capacity.

Ms. Saheki commented that if the Commission is going to hold onto the idea of a parking requirement of .75 spaces per unit, it is important that the higher density occurs first in an area that is within walking distance of a grocery store. As she previously stated, people will do much more than commute to work, and the Commission should give these other activities more weight when considering where density is placed in respect to the forthcoming light rail station. She suggested that the first phase be clustered along 15<sup>th</sup> Avenue Northeast, Aurora Avenue North, and possibly Meridian Avenue.

**Response:**

Comments are noted. Chapter 1 and Chapter 3, Section 3.1, and Section 3.2 discuss the theory for providing the highest level of density in close proximity to the light rail station. All action alternatives are based on this planning theory. Sections 3.1 and 3.2 also address existing housing stock/characteristics. The FEIS considers the concept of phased zoning for all of the action alternatives.

**Krista Tenney**

Said her family moved to Shoreline in 1988, and they love every inch of their ¼-acre property. She attends a church that is on 1<sup>st</sup> Avenue Northeast and 147<sup>th</sup> Street, which is a challenging intersection with no left turn. She referenced Mr. Derdowski's earlier comments about the need for more interaction with the City of Seattle regarding traffic impacts. She specifically asked the Commission to consider the impacts of Alternative 2 for the triangular property between the freeway and 1<sup>st</sup> Avenue Northeast. This property is proposed for dense development, and she does not understand how 1<sup>st</sup> Avenue Northeast can be widened to handle the additional traffic. She emphasized the need for the Commission to consider the impacts to the neighborhoods. She asked them to slow the process down to make sure the plan is done wisely. She said she supports Mr. Derdowski's earlier recommendation that the City consider the 145<sup>th</sup> and 185<sup>th</sup> Street Station

Subarea Plans together. These two areas are very close to each other and the impacts will be far reaching. If possible, she asked them to wait to make a decision until after Sound Transit has issued its FEIS.

**Response:**

Comments are noted. Chapter 3, Section 3.3 addresses transportation impacts and includes the 145<sup>th</sup> Street Corridor Study, a multi-jurisdiction study that included the City of Seattle. The City of Seattle has received notice of the EIS and has not submitted any comments. The FEIS acknowledges concurrent projects, including the adopted 185<sup>th</sup> Street Station Subarea Plan, and the resulting impacts and mitigation measures for the two subareas are being considered concurrently. Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact. Also, see response to your January 29, 2015 public comment.

**Janet Way, Shoreline Preservation Society (SPS)**

Stated that the Shoreline Preservation Society (SPS) is a Washington State non-profit organization with members living in and around Shoreline who work to preserve the environment and quality of life. She requested that the SPS be granted party of record status with legal standing. In addition, she asked that all of SPC comments before and after the hearing be included in the record by reference. She explained that the planned action ordinance would leave out residents who wish to give input on details not yet analyzed. New residents who move to the City in the next few years would have no right to comment or play a part in future growth, either. She urged the Commission to reject this aspect of the proposal.

Ms. Way referred to a statement in the DEIS found in the “Changes in Neighborhood Section,” which states that *“the City acknowledges that even though a decision to stay or sell is entirely up to the property owner, those who feel as if their neighborhood is changing beyond their comfort level may still feel forced out. The City also acknowledges that even for those who support change, transition and construction can be uncomfortable and unpleasant.”* The DEIS acknowledges that people are going to be displaced.

Ms Way noted that key areas are not addressed in the DEIS; most outstandingly, the segregation of the environmental review between the 145<sup>th</sup> and 185<sup>th</sup> Street Station Subareas. It is as if they are in two separate time zones or countries. The cumulative impacts on traffic between the two subareas need to be addressed, as do the cumulative impacts on infrastructure (drainage, stormwater runoff, wastewater, water, etc.) She pointed out that the DEIS does not consider the impact on the existing community when a large number of the residents are displaced. She pointed out that the 145<sup>th</sup> Neighborhood is currently a healthy neighborhood, and nearly all of the properties are developed with single-family homes. She questioned the potential for blight resulting from speculative development, and noted that the issue was not analyzed in the DEIS. The DEIS did not analyze the impact imposed on the neighborhood when properties transition to rental

units, either. She suggested that spot development could subject both light rail station areas to blight. The DEIS should study the impact to property owners and the potential for homeowners to sell and buyers to get mortgages.

Ms. Way reminded the Commission that parks and open space is a requirement of density as per the Growth Management Act (GMA), yet the provisions in the DEIS and the preferred alternatives for increasing or enhancing open space are very inadequate. Existing useable open space for the current population is already inadequate, but only one new park is suggested in the DEIS for the projected population increase of between 2,886 to 5,314 new residents. She said there are numerous opportunities within the station area that could be utilized to provide more open space, access and recreation if it was required. In particular, she said the Paramount Park open space needs to be protected, as it is the largest wetland in Shoreline and is salmon habitat if the fish could get there. In addition, the Jackson Park Golf Course is a public course, and it would be an abomination if that were taken over by development as suggested in the market study. She summarized that the emotional impact to the community as a result of the two subarea plans would be huge. The salability of single-family homes and parking impacts are also significant concerns. She resubmitted her drawing of the rezone area with about half the density. She also referred the Commission to the Thornton Creek Watershed Study, which she previously submitted. Lastly, she asked the Commission to slow down the process.

**Response:**

See responses to your February 5, 2015; and March 17 and 21, and April 7, 2016 written comments.

**Sharon Cass**

Agreed with the previous speakers that the City should slow down the process. She said she has lived in her home, which abuts Twin Ponds Park, for 52 years. It is so wet in the fall, winter and spring that she cannot walk in her backyard. She said she supports Alternative 1.

**Response:**

Comments are noted. Prefers Alternative 1 – No Action Alternative. See also City’s Response to February 13 and 14, 2015 written comments. See Section 3.4 for discussion about Twin Ponds Park and wetlands.

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## ***Responses to Spoken Comments during February 9, 2015 City Council Meeting***

### **Brian Derdowski**

Sensible Growth Alliance Public Interest Associates, expressed concern about the planned action rezone and recommended that Council adopt potential zoning so it allows existing zoning to remain in place, and combine the 185<sup>th</sup> and 145<sup>th</sup> Environment Impact Statements (EIS). He suggested adopting Sound Transit's EIS as a reference document, defining Phase 1 as the area in the immediate vicinity of the station, and reducing form based zoning to the immediate area around the Stations. He commented on public opposition, potential political impacts, and asked Council to work with the community.

#### **Response:**

Comments are noted.

### **Peter Watters**

Shoreline resident, commented on the rezone change from the perspective of an older population and the millennial population, and talked about families fitting in the new rezone.

#### **Response:**

Comments are noted.

### **Dan Jacoby**

Requested Council to slow down the rezoning process, rezone a smaller area next to station, and then step back to see what happens. He advocates for not making Shoreline North Seattle, and offered his support for Councilmember Roberts' Option One recommendation.

#### **Response:**

Comment noted. The City Council amended the adoption schedule.

### **Karen Easterly Behrens**

Read a quote from Mayor Winstead, and then commented on selling, financing and buying a single family home in the Station Subarea.

**Response:**

Comment noted.

**John Kropf**

Submitted maps to resolve transportation problems in Shoreline.

**Response:**

Comments are noted.

**Paul Goracke**

Commented on his preference of raising a family in the area in detached buildings, and not wanting to live in a high density area. He asked why there is a rush to start Phase 1, and that Council consider the people that could be displaced.

**Response:**

Comment noted. The City Council amended the adoption schedule.

**Rosalyn Lehner**

Commented on buying a house five years ago and selecting Shoreline as a good place to raise her children. She asked Council to reconsider rezoning.

**Response:**

Comment noted.

**Angela Henry**

Commented on buying a house a year and a half ago, and stated she is not sure how she would get a new home or a new loan with the proposed rezone. She asked Council to vote no.

**Response:**

Comment noted.

**Janet Way, Shoreline Preservation Society (SPS)**

Asked Council to slow down the process due to numerous problems with the project. She referenced a map and shared that Sound Transit recommended building 700 units of housing around the Station within the first 20 years. She asked Council to wait for the FEIS from Sound Transit before making a decision. She then commented on having a legal memo from Dennis D. Reynolds Law Office, and read information from the document regarding SEPA and Planned Action Ordinances.

**Response:**

Comment noted. The City Council amended the adoption schedule. See responses to your other comments.

**Elaine Phelps**

Expressed concern that the appropriate processes have not been followed to inform the entire community of the rezone changes, commented that neighbors are scared and upset, and gave her perception of how the process looks to her.

**Response:**

Comment noted.

**Ted Hikel**

Commented on his awareness of rezones and their effects. He asked who will pay for the costs of additional city services and required open space, and asked Council to do a full cost benefit analysis.

**Response:**

Comment noted.

**Ruth Williams, Thornton Creek Alliance**

Spoke on how Thornton Creek has been harmed from commercial development and freeways. She read an excerpt from the Vision Statement in Shoreline's Comprehensive Plan, talked about the new Station changing the area, and commented on the need to keep and protect open spaces.

**Response:**

Comment noted. Parks and open space areas, along with critical areas, would be preserved and protected under any of the alternatives.

**Meghan Peterka**

Commented on purchasing their home in a community, and not as a land investment. She commented on displacing people in adult family homes and expressed that she wants her community to be welcoming.

**Response:**

Comment noted.

**Tom Jamieson**

Commented he is happy to see so many people in the Chamber as a result of a rallying community, and asked Council to allow all the people to be heard.

**Response:**

Comment noted.

**David Higgins**

Requested that the urban density Council promised to Sound Transit happen at a slower rate. He expressed support for adoption of the zoning alternative recommended by the Planning Commission, retention of nonconforming use in MUR-35 and MUR-45 zones, and mitigation for those being asked to leave Shoreline. He discourages minimum density requirements.

**Response:**

Comment noted.

**Ginny Scantlebury**

Asked how a decision can be made on the rezoning for the 185<sup>th</sup> Subarea Station before reviewing the FEIS from Sound Transit, and asked Council to consider Alternative I in the packet. She commented that too many residents still do not know what is going on.

**Response:**

Comment noted.

**Wendy DiPeso**

Asked that the rezones for the 185<sup>th</sup> Street and 145<sup>th</sup> Street Station Subareas be limited to properties immediately adjacent to the Station, to vet Councilmember Roberts' proposal with the community, and that no more rezoning take place until after Phase 1 is completely built out. She supports the Subarea Plan guiding development in the area and not a Planned Action, and waiting for Sound Transit's FEIS to be released so the public has an opportunity to review and comment on it.

**Response:**

Comments are noted.

**Carol Ingraham**

Commented on the excellent schools in Shoreline. She is noticing high density proposals but not seeing information on how schools will accommodate the increased density. She asked Council to slowly phase in the Plan.

**Response:**

Comments are noted.

**Jan Helde**

Commented that the rezone does not benefit homeowners and expressed concern about paying property tax for land without a lot of value. She asked if the Plan could start with shorter buildings and a smaller footprint to see if the area can handle the added traffic.

**Response:**

Comments are noted.

**Robin Lombard**

Asked Council to consider postponing rezone decisions until Sound Transit's FEIS is released.

**Response:**

Comment noted.

**Kathy Vaughn**

Mentioned she was a Lynnwood resident, representing her mother-in-law who lives in the area, and commented that they were unaware of the Station Subarea Planning until they received the Grizzly flyer. She shared that they and their neighbor have not received any mail from the City. She asked Council to make sure the community knows what is going on.

**Response:**

Comment noted.

**Jan Stewart**

Asked Council to slow down the process since people are just realizing the magnitude of the proposals. She commented that informational announcements focused on light rail and not the rezone, and that phased zoning has not been adequately studied or discussed in public meetings. She commented that the large scale rezones are not required by Sound Transit or the Growth Management Act, and asked Council to slow down and wait for Sound Transit's FEIS.

**Response:**

Comment noted.

**Julie Houff**

Commented on recently becoming aware of the project and not seeing details on the maps. She perceives the process as a work in progress, and commented on Sound Transit's 700 unit recommendation for the area.

**Response:**

Comment noted.

**Christine Goetz**

Read a statement regarding data collected in her community regarding public awareness of the Light Rail Station Subarea Planning process, and asked if the planning supports Vision 2029.

**Response:**

Comment noted.

**Timothy Humphries**

Asked Council to wait to receive Sound Transit's FEIS before making a decision.

**Response:**

Comment noted.

**Dan Dale**

Asked Council to wait for Sound Transit's FEIS so that better decisions can be made. He commented on the Shoreline Stations being a neighborhood station to the Lynwood Link Extension that would evolve over time. He expressed support for concentrated development closest to the stations.

**Response:**

Comment noted.

**Boni Biery**

Commented on concerns about a potential increase in water on property, taxpayer funding for a new infrastructure to address flooding while developers are exempt from paying property taxes. She referred Council to Agenda Item 7c.

**Response:**

Comment noted.

**Will Sigman**

Commented on phased zoning, traffic, parking issues, and said he is not entirely sure what the plan is now since there have been so many changes.

**Response:**

Comment noted.

**Les Nelson**

Shared that he is an expert on RCW 36.80 and fighting development next to single-family residential neighborhoods. He commented that the City's original EIS states that Shoreline was incorporated to be a bedroom community with views and trees, and that we are losing the goal of the original EIS.

**Response:**

Comment noted.

**Jeff Eisenbrey**

Commented that Council needs to wait for the FEIS or the City might close off opportunity to make legitimate challenges provided by SEPA. He read excerpts from 2009 Rutgers Law Record regarding limiting eminent domain, notification of neighbors, and relocation assistance. He commented that the process is going too fast and urged Council to slow down.

**Response:**

Comment noted.

**Cathy Kennedy**

Urged Council to slow down, and commented that her neighborhood is a nice place where neighbors gather together, and fears this Plan will adversely impact the neighborhood.

**Response:**

Comment noted.

**Cheryl Anderson**

Provided background on volunteering in the community, and shared that she recently found out about the proposed rezone through the Grizzly Flyer. She expressed concern about traffic and school impacts, and referenced the Ballinger Commons project and stated that they did not consider impacts. She asked the Council to slow down the process.

**Response:**

Comment noted.

## ***Responses to Spoken Comments from the February 19, 2015<sup>1</sup> Continued Planning Commission Public Hearing<sup>2</sup> (from February 5, 2015)***

### **Brian Derdowski, Issaquah**

Commented that in just one hour of public comment, citizens were able to convince the City Council to loosen up the process and open their minds. As the process moves forward he encouraged the Commission to:

- Provide input to the City Council about how to redraw the boundaries for the subarea. If an area is over zoned, its value to redevelopers is reduced, making a large property's competitive advantage less than a small property. In addition, the boundary needs to be more directly associated with the freeway interchange and Sound Transit Station. It should be strategically designed so it is ripe and attractive to the right kind of development. If the first project is the wrong kind of development, the entire vision will be damaged.
- Reconsider the form-based Development Code Regulations that will control the proposed Planned Action Ordinance. Staff should be directed to create a matrix that compares the City of Seattle's standards with the City's proposal. Shoreline's code should not be any less restrictive than the City of Seattle's code or they will end up attracting Seattle's "cast off" development. The citizens do not have the time and money to hire enough experts and lawyers to do all the work, and it is up to the Commission to provide input in order to ensure a better outcome.
- Preserve the City's State Environmental Policy Act (SEPA) authority going forward by adopting a policy, as part of the Final Environmental Impact Statement (FEIS), that would give the City the ability to review stormwater, transportation and utility impacts as part of future development permit review. If a mistake is made in the proposed plan, SEPA could be used to fix the problem, if necessary.

Mr. Derdowski encouraged the Commissioners to look at station area planning as a fantastic opportunity for everyone who lives in the City. Now is the time for the City to redouble its efforts to get good results.

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<sup>1</sup> The City has provided a summary of the spoken testimony provided at the Planning Commission's February 5 and February 19 public hearing. For verbatim testimony, audio of the public hearing dates are available on the City's website at: <http://www.shorelinewa.gov/government/departments/planning-community-development/planning-commission/meeting-agendas-and-minutes/-toggle-allpast>

<sup>2</sup> The listed individuals testified on both dates. The City's response is based on a consolidation of their testimony on both dates.

**Response:**

Comments are noted. Also see responses to your other comments.

**Jerry Patterson**

Said he has spoken to numerous agencies on behalf of the Shoreline Coalition for Open Government and Richmond Beach Advocates. He currently serves on the board of the Richmond Beach Community Association. Rather than speaking on behalf of these groups, he said he was present to speak as an individual in support of neighborhoods. He reviewed that the Commissioners were appointed by the City Council and instructed to be an independent group making recommendations to the Council. The City Council Members are not looking for the Commission to provide answers that fit their particular public postures. Although he does not live in the neighborhoods near the 145<sup>th</sup> or 185<sup>th</sup> Street Stations, he supports the neighborhood concept. He referred to the neighborhood theme that is clearly called out on the homepage of the City's website. He also noted that he had an opportunity to work with the Council of Neighborhoods to develop a mission and vision for the concept of neighborhoods within the City. This group's core values relate to promoting a sense of pride and belonging to the Shoreline community of neighborhoods, which celebrate the uniqueness of all the neighborhoods emblematic of what the City stands for. He requested that the Commission focus on neighborhoods as an integral part of what the City has been, what the City is, and what it should be in the future.

**Response:**

Comments are noted.

**Peter Watters**

Recalled that at the last City Council meeting he attended, Councilmember Hall defended the urgency for moving forward with the station plans by referencing the spike in gas prices and people wanting higher densities. He does not believe that is a wise approach to planning. While he is not advocating a significant increase in gas prices, he noted that some countries change behaviors and encourage public transit by imposing steep taxes on gas. He said it does not seem realistic to have high-density development by transit centers that can only go north and south. He voiced concern that the current proposal would require only .75 parking spaces per unit, when it is common for each adult to have at least one vehicle.

**Response:**

Comments are noted.

**Shanna Sierra**

Said she lives within the boundaries of the proposed 145<sup>th</sup> Street Station Subarea and looks forward to having the ability to walk to local coffee shops and use public transportation to get to work. However, the community has clearly stated to both the City Council and Planning Commission the level of density they are willing to accept, and they are willing to fight and push forward with litigation. While the community desires rail and the benefits that come with it, they believe it should be integrated into the existing communities. The plans, as proposed, would replace the existing strong neighborhoods with multi-density development. She noted the impacts of the taller developments that have occurred in Fremont and contrasted them with the 35 to 45-foot buildings that meld into the community. The taller buildings block sunshine in an area of the country where citizens have very limited Vitamin D. She noted the trees that are currently located along the streets in both the 145<sup>th</sup> and 185<sup>th</sup> Street Station Subareas that would likely be wiped out, as well. She asked the Commission to slow down the process and present plans to the City Council that integrate the comments that have been raised over and over again by the neighborhoods. While the City staff had indicated the need for an additional 5,000 plus units in the station areas, Sound Transit indicated that approximately 720 units would be sufficient in the immediate vicinity.

**Response:**

Comments are noted.

**Robin Lombard**

Said she lives slightly more than ¼ mile from the proposed 145<sup>th</sup> Street Station. She welcomes light rail and understands the need to provide affordable housing and create a walkable neighborhood around the station and believes this can be done with careful planning over many decades. She voiced concern that although the DEIS and subarea plan have a lot of details about the end vision (60 to 100 years), they fail to identify the series of steps needed to get there. For example, what steps need to be taken now so the City is ready for the increase in traffic that will result when the stations open in 2023? The City will suffer if it does not think through how to deal with very heavy traffic on 5<sup>th</sup> Avenue, 155<sup>th</sup> Street, NE 145th Street and a number of other secondary streets.

Ms. Lombard commented that she does not understand why rezoning has to happen now when full build out is not expected for 60 to 100 years. Instead, she suggested the City should focus on the steps that can be taken over the next 10 to 20 years to ensure a smooth transition of the area around the station from single-family homes to a mix of transit-oriented development. A phased-zoning approach would provide more certainty for homeowners and allow for a gradual transition. The phased zoning could be tied to a series of milestones that include roadway and utility improvements. She thanked the Commission for their work and said she trusts them to balance all of the facts and opinions and make recommendations that are in the best interest of the City and its citizens.

**Response:**

Comments are noted. Chapter 3, Section 3.3 addresses transportation impacts, incorporating the 145<sup>th</sup> Corridor Study, and sets for mitigation measures to address these impacts. The FEIS considers the concept of phased zoning, with Phase 1 based on a 20-year growth period, the same time period the City is required to plan for under the Growth Management Act, 36.70 RCW. The FEIS considers the concept of phasing for all action alternatives and the City has completed development of the 145<sup>th</sup> Corridor Study. See also City's Response to written comments of 145<sup>th</sup> Street Station Citizens Committee submitted Feb 19, 2015 and comments submitted by Lombard on February 4, 2015.

**Ellen Sullivan**

Said she lives in the Ridgcrest Neighborhood, just north of 152<sup>nd</sup> Street. She does not want to and cannot afford to move from her current home. She has spent the past several years making small improvements and creating a large garden. It is meant to be her home for the rest of her life, as well as her investment in her future and her sanctuary away from the stresses of life and work. Saying this is a decades long process does not ease her concern, as she plans to live in her home for decades more. Saying that the process is driven by market forces does not make her feel any better. Inevitably, someone near her will sell their home and developers will let the property deteriorate until homeowners begin to sell and development will begin. When she looks out her back door, she sees one house and the roof of another, beautiful old pine trees, a vast expanse of sky, sun, and sunsets. If the plan moves forward as proposed, trees will be taken down and four to seven-story buildings will be constructed to eclipse the sun and sky from her property. While the City is saying no one will be forced from their homes, taking away the peace and quiet, the privacy, the sun, the sky and the wildlife is a sure fire way to make me her feel forced out. She urged the Commission to take more time and reduce the scale of the rezone.

**Response:**

Comments are noted.

**Dia Dryer**

Commented that the generally accepted distance that people are willing to walk to transit is  $\frac{1}{4}$  to  $\frac{1}{2}$  mile, and radius mapping only shows unconstrained access as the crow flies, not real street grid walking distance. This results in inflated and inaccurate planning. Using walk sheds, much of the rezone area on the map is actually beyond a half mile, and nearly half of the area west of Interstate 5 is beyond the  $\frac{1}{2}$ -mile walk shed. In addition, 10% to 20% of the area within the  $\frac{1}{2}$  mile walk shed are properties that are tax exempt (churches). These property owners will not be so inclined to move because they won't feel the market pressure. If phased zoning is used on the east side of Interstate 5, she questioned why not on the west side, as well. She also questioned why they continue to include properties beyond the  $\frac{1}{2}$  mile walk shed on the west side of Interstate 5, but exclude many properties on the east side even though they are within  $\frac{1}{2}$  or  $\frac{1}{4}$  mile of the

station and on the same side of the freeway. As per Alternative 2, many properties on the east side of Interstate 5 would be upzoned beyond what they would be zoned at if there was non-phased zoning. Buildings that were 35 feet tall would be 45 feet tall and buildings that were 45 feet tall would be 85 feet tall. Because the churches and parks take up so much of the acreage, the area west of Interstate 5 did not qualify for a sound wall. If the community is supposed to be desirable, she would assume a sound wall would go up first. She summarized that she does not have a preference between Alternatives 2 and 3, and slowing the process down will not change the outcome. She wants the outcome to be changed, and not delayed.

**Response:**

Comments are noted. Chapter 1 and Chapter 2 discuss the development of the alternatives, including the delineated of the subarea boundaries based on walk shed radii, and presents an additional alternative based on public comment – Alternative 4 Compact Community Hybrid. Chapter 3, Sections 3.1 and 3.2 discuss market trends and re-development, including larger policies owned by religious organizations. The FEIS considers the concept of phased zoning and it is addressed on both the west and east sides of Interstate 5.

**Patricia Weber**

Commended the Planning Commission for paying attention to the concerned residents and being willing to continue discussions and prolong the decision. She questioned what is meant by “city planning” and what education the City Planners are required to have. She referred to the website of the Association of Collegiate Schools of Planning, which states that *“Planners are to help community residents develop ways to preserve and enhance quality of life; find methods to protect the natural and built environment; identify policies to promote equity and equality; and structure programs to improve services to disadvantaged communities.”*

Ms. Weber said the website further states that *the skills of city planners should involve all affected parties in important planning decisions.* While the public hearing is an example of inclusion, she noted that many of the meetings pertaining to the 145<sup>th</sup> Street Station Subarea Plan have not been well advertised nor well explained. She said the website also states that *“City planners should help, not direct, communities to develop their own version of the future; prepare plans responsive to shared community objectives; analyze solutions to complex problems, evaluating cost effectiveness; and present recommendations to officials and citizens in a comprehensive and understandable way.”*

Ms. Weber recommended the Commission return to the ideals outlined above. She commented that residents of Shoreline are not just small land owners put in place as an annoying impediment to an inflated, if flawed, scheme. They are the community, and not a group of irresponsible dissenters. They make up the community that wants to be respected for its current identity of neighborhoods.

**Response:**

Comments are noted. Chapter 1 and the Public and Stakeholder Involvement Plan (Appendix) detail the public process the City utilized for the 145<sup>th</sup> Street Station Subarea.

**Sigrid Strom**

Said she is a former member of the citizen advisory committee that was appointed for the Southeast Neighborhood Subarea Plan. She expressed her belief that all of the work this group did in terms of identifying the context for planning in this area has been “deep sixed.” She said she plans to do a detailed comparison of the two plans and provide written comments. She recalled that the committee felt strongly that the 145<sup>th</sup> Street Corridor was a problem that had to be addressed before any planning or rezoning took place. She was appalled that, up to this point, the recommendations of the people who are currently studying the 145<sup>th</sup> Street Corridor were not even included in the DEIS. She observed that a lot of data is missing from the process, and much of the data is outdated and/or questionable. As a trained limnologist, she commented that the ground water problems in the subarea are significant and have never been adequately mapped or addressed. It is a huge mistake to believe that the City can avoid water problems in the future by simply driving steel beams to bedrock every time development occurs. She said she would like the City to complete fundamental planning that includes ground water, building community, and economic development other than mixed use.

**Response:**

Comments are noted. Per the City Council’s direction, the 145<sup>th</sup> Street Station Subarea was suspended pending the development of the 145<sup>th</sup> Corridor Study. The City has therefore had the opportunity to review all public comment received to date on the proposal. The action alternatives were developed based on public comment and all include green corridor concepts. (See Chapter 2 Description of Alternatives). The subsequent subarea plan and its development regulations will be subject to additional public comment and review. The 145<sup>th</sup> Street Corridor Study has been completed and is incorporated in the FEIS. Chapter 3, Section 3.4 as well as the DEIS Addendum addresses groundwater impacts. See also City’s Response to Feb 19, 2015 written comments submitted by Sigrid Strom.

**Judy Nelson**

Stated her belief that the City should only rezone the area encompassed by 5<sup>th</sup> Avenue NE, Interstate 5, N 155<sup>th</sup> Street and NE 145th Street. She observed that 15<sup>th</sup> Avenue already has a large grocery store (QFC), Starbucks, dollar store, Goodwill, Burger King, and several apartment buildings. Residents of new apartment buildings along Interstate 5 would not have to travel far to shop, and there is still room for more businesses. She voiced concern that, ultimately, all Shoreline homeowners would have their property taxes raised substantially to pay for installation of part of the infrastructure for any new development. She commented that, as per the plan, developers would be given incentives of paying no taxes for ten years or more and apartment residents do not pay property taxes. That means homeowners would

incur the cost of increasing the number of police officers, clerical support, additional police cars, fire trucks that can reach the upper stories of high-rise buildings, and an additional fire station. Additional emergency medical technicians (EMT) and emergency vehicles would also be required.

Ms. Nelson pointed out that high-density housing would mean a dramatic increase in the school population, which would require additional teachers and enlarged or additional school facilities. She referred to the sustainable community concept outlined in the City's Comprehensive Plan where residents are encouraged to have gardens and grow their own food. Apartment residents cannot do that, and neither can property owners if their gardens are shaded from the sun by high-rise buildings. She commented that installing apartments necessitates a removal of existing tree canopy and oxygen producing plants. The proposed plan only shows trees along the corridors and a few token plants along the fronts of buildings, which will not make up for the number of plants removed. Roof gardens might be helpful, but she questioned how the City can ensure they are used and maintained as it cannot mandate apartment residents to keep them planted and cared for.

Ms. Nelson said that, presently, the community garden plots at Twin Ponds are in great demand, yet the City has told the group they cannot expand the number because Twin Ponds is already very polluted and expanded gardens would add to that pollution. Yet the City is now encouraging high-density housing in the area and additional stormwater runoff resulting from more paved area and wider streets. This would definitely add to the pollution in the ponds. She pointed out that Twin Ponds and Thornton Creek constitute a bog area that should not be included in Phase I. Instead, it should be studied, protected and carefully considered in any future phases. The proposed plan identifies the area as MUR-35, which means part of the bog would need to be filled in. She questioned how environmentally sound that would be. She summarized that she moved to the area because of all the greenery. She has made substantial improvements to her home over the years, as have many of her neighbors. She believed that the improvements would add to the equity of her home. The neighborhood wants to protect its equity, which would be removed by the proposed rezoning.

**Response:**

Comments are noted. Per the City Council's direction, the 145<sup>th</sup> Street Station Subarea was suspending pending the development of the 145<sup>th</sup> Corridor Study which is incorporated in Chapter 3, Section 3.3 Transportation. Future projects in the subarea will be subject to traffic mitigation and concurrency requirements. Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact. Chapter 3, Sections 3.4 and 3.5 speak to critical areas, such as wetlands, and parks and open natural spaces. A new alternative presented in the FEIS, Alternative 4 Compact Community Hybrid, maintains the current single family zoning around Twin Ponds. Future development will be subject to development regulations related to the protection of critical areas and water quality.

Chapter 3, Section 3.6 addresses the impact on public services including, police, fire, and schools. All action alternatives include a “Green Network” concept to reflect the public’s expressed desire for retention of vegetation.

### Liz Poitras

Recalled that the City Council has repeatedly discussed the need for more housing choices, and that is one of the benefits or rezoning in the station subareas. She referred to Figure 3.2-3 in Section 3 of the DEIS, which identifies the number of affordable housing units by income group in Shoreline. The map indicates its source as the 2012 Comprehensive Plan. She provided a table she made to show the available stock of housing units affordable to low-median income (\$40,000 to \$60,000) and very-low income (\$5,000 to \$40,000). The houses in the low-median income range (\$99,720 to \$265,999) were sorted from most units to least units by neighborhood. She summarized that the Ridgecrest Neighborhood has 20% of all the affordable houses in Shoreline, and all the neighborhoods affected most by the light rail station subareas (Ridgecrest, North City, Echo Lake and Parkwood) provide 56% of this type of housing in Shoreline. She acknowledged that the data can be spun a number of ways, depending on what you want to sell. For example, you could say that people live in these homes because they can’t find lovely little apartments to rent or town homes to buy because Shoreline doesn’t provide enough in this price range. However, to many people, affordable housing means a small house with a yard for children to play, an area to grow vegetables, or space for a hobby.

Ms. Poitras said it has been suggested that senior citizens who become too decrepit to take care of their homes and yards will enjoy moving into apartments for a while before entering assisted living. However, some might want to continue to grow prized dahlias, host family Thanksgiving dinners and stay in their homes until the big move to assisted living. It has also been suggested that hordes of millennials will want to live in apartments that provide an easy walk to their commute via light rail to downtown Seattle. The assumption is that when they start having children, they will stay in the townhouses or apartments. However, many people won’t want to raise children in apartments and will move somewhere else for their white picket fence and yard. She questioned if there would be a steady stream of millennials to take their place.

Ms. Poitras summarized that it has been stated that more affordable housing is needed in the City, and the two station subareas are the best place for it. This would leave the rest of Shoreline for detached, single-family homes. However, it is important to take note that most of the affordable housing in the subareas would be apartments, which is not everyone’s choice. Because it does not know what people will do or want in the future, she suggested the City use a phased approach to zoning that will enable future adjustments if needed. For example, she recommended that only the southern portion of the Ridgecrest Neighborhood be rezoned, leaving all the affordable homes in the northern portion above 155<sup>th</sup> Street intact. Rezoning in the southern portion of the subarea should be done in at least two phases to leave some affordable homes there for a while.

**Response:**

Comments are noted. Support for Alternative 3 with no added corridors for the 145<sup>th</sup> Street Station Subarea. See Chapter 3, Section 3.3 for an analysis of Transportation impacts and includes the 145<sup>th</sup> Street Corridor Study. Chapter 3, Section 3.1 Land Use Patterns, Plans, and Policies and Chapter 3, Section 3.2 Population, Housing, and Employment speak to market forces and affordable housing. The City's policies and regulations require the provision of housing to all economic segments. The FEIS discusses the concept of phasing for all action alternatives.

**Wendy DiPeso**

Referred to pictures she submitted earlier that were taken from 32<sup>nd</sup> Avenue NE, just north of NE 145<sup>th</sup> Street. She noted that two developers own most of the property on the street. She recalled that the Southeast Subarea Plan was adopted in 2009, after a two-year community process. Since that time, the properties have degraded noticeably, and she suggested this was done by design. By allowing the properties to degrade, the developers will be able to purchase the remaining parcels for a lot less. She suggested this same scene (abandoned furniture, boarded up homes, etc.) would play out in the station subareas if the proposed plans are adopted. She questioned why the City is proposing a massive rezone when its Growth Management Act (GMA) goals can be met without it. She observed that the Southeast Subarea Plan provides an example that rezoning large parcels does not result in affordable housing. Instead, it harms the community and results in blight, as illustrated in the photographs. She urged the Commission to only rezone those parcels immediately adjacent to the station and keep the blight contained. Once these areas are completely redeveloped and at 80% capacity, the City could consider additional rezones.

**Response:**

Comments are noted. Based on public comment, the FEIS recognizes the Southeast Subarea Plan in regards to the 145<sup>th</sup> Street Station Subarea. The FEIS considers the concept of phased zoning is considered for all action alternatives.

**Patricia Panitz**

Said she owns property that abuts the subarea. She commented that no one wants the proposed plan except those who will profit from it. The developers who favor the plan do not live in Shoreline, and they do not care about the affects the massive buildings will have on traffic, the need to upgrade infrastructure, the school system, and the people who will be displaced. Little thought is being given to these potential very serious problems in the rush to get the plan approved. The 145<sup>th</sup> Street corridor is an example of a potentially negative traffic situation resulting from the plan, particularly the part that accesses and egresses Interstate 5. Already, it is overcrowded and difficult to navigate around rush area. A triangle of land running along NE 145th Street and 1<sup>st</sup> Avenue has been designated for 65 to 85-foot buildings, which

would make the traffic situation at rush hour unmanageable. She suggested it is unrealistic to assume that most people will use the light rail, as it will not provide access to other needed services.

Ms. Panitz said Shoreline is justly proud of its excellent school system, and it is one of the main features that attract people to the City. The planners just assume new schools will be built, but this will cost a lot of money and people may or may not be willing to pay it. If not, what affect will it have on the quality of schools and the district's reputation. She questioned why the City is pandering to and providing stability for developers. Most people who learn the details of the plan are shocked and believe the claims made in support of it are questionable. Young people do not want more density; they want single-family homes with yards where their children can play and good schools they can attend. Older people are not anxious to sell their homes; they want to stay in them. If the plan goes through, Shoreline will end up looking like Seattle. If she wanted to live in Seattle, she would have moved there. She summarized that no one wants the project except people who will profit from it. Elected and appointed officials have a duty to citizens of the town who have indicated they do not want it; not to out of town business interests who do.

**Response:**

Comments are noted. Chapter 3, Section 3.3 Transportation address transportation impacts and incorporates the 145<sup>th</sup> Street Corridor Study. Chapter 3, Section 3.6 address the impact on schools, which are planned and funded via decisions made by the Shoreline School District, an entity separate and distinct from the City. Chapter 3, Section 3.1 and Chapter 3, Section 3.2 discuss market forces and housing demands. See also City's Response to written comments submitted on January 23, 2015.

**145<sup>th</sup> Street Station Citizens Committee (145SSCC) by Robin Lombard**

She advised that, on many occasions over the past 18 months, the members of the 145SSCC have been asked to provide input on the 145<sup>th</sup> Street Station Subarea Plan. She read a letter that provided feedback from the members, many of whom have participated since the group was formed in August of 2013. The letter recalled that in two design workshops and the months before and after, the committee acknowledged the need for greater density and low-income housing and came up with pictures and design elements for 3-story buildings, as well as parks, trails, and other amenities. Some of the members of the committee put a lot of energy into the process. Many were surprised and angry when the proposal for the subarea plan came back with 8-story buildings. The committee was thinking about the near term (first 10 to 20 years), but that was not the City's focus. The letter noted the following concerns related to near-term impacts:

- Many committee members are uncomfortable with what they feel is a rush to upzone the entire area. They understand that the City needs to plan for greater density, but not the need to upzone a large swath of the neighborhood this year to a density it is not expected to reach for 60 to 100 years. Questions were raised about the timeline and the consequences of not meeting it. They agree that a plan is needed for grant funding, but questioned if the funding decisions hinge on the large zoning changes being enforced by June of 2015.

The proposed zoning changes are larger than the committee members expected. Because it has been explained that the full build-out won't be seen for 60 to 100 years, the committee favors a plan that gradually phases in zoning over those years for full build-out. The committee also believes the phased zoning should be tied to specific milestones such as utility, stormwater, and traffic improvements. They also feel a smaller first step in rezoning would be in line with the market analysis that was done for the subarea plan.

- Many committee members are concerned about the plan for NE 145th Street, itself. The DEIS did not address traffic along 145<sup>th</sup>. Instead, it referred to the route development plan that is still unfinished. City staff have communicated to the committee that one project will inform the other, and maybe that is the best case scenario that can be achieved in this situation. However, the committee does not think it makes sense to rezone anything along NE 145th Street until both plans are synchronized. How will the livability of communities be defended during a potentially longer development period of two separate projects, such as updating NE 145th Street and building construction in a rezone area.
- The committee believes that the newly proposed Map E extends MUR-85 zoning too far from the station. She referred to the Polaris Development (185<sup>th</sup> Street and 12<sup>th</sup> Avenue) as a living example of how MUR-85 zoning might impact existing residents in terms of both parking and unwanted lighting. The committee feels that, at least initially, MUR-65 or MUR-45 would be more appropriate.
- The committee would like to see single-family homes as a permitted use in all upzoned areas. It is unclear exactly what will happen to single-family homes in the different upzoned neighborhoods in terms of value and salability. This is a special concern for many neighbors who plan to continue to live in their homes after the light rail arrives. Allowing single-family homes as a permitted use would provide more options to the current homeowners.

Ms. Lombard said that, as a result of the above issues, the committee also requested the Commission delay its recommendation to the City Council until at least April when Sound Transit's FEIS is available. It will be important for the community, committee, Planning Commission, City Council and City staff to know what Sound Transit requires or will pay for before any action is taken regarding zoning around the station. The members of the committee want to live in a vibrant community, and they want the plans for the 145<sup>th</sup> Street Station Subarea to reflect the residents' desire for gradual change. They appreciate that the Commission represents their interests in matters of City planning and are participating on the committee so they can provide a neighborhood voice to guide and support the Commission in its decision making.

**Response:**

Comments are noted. Chapter 3, Section 3.3 addresses transportation impacts, incorporating the 145<sup>th</sup> Corridor Study, and sets for mitigation measures to address these impacts. The FEIS considers the concept of phased zoning, with Phase 1 based on a 20-year growth period, the same time period the City is required to plan for under the Growth Management Act, 36.70 RCW.

Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact. The FEIS considers the concept of phasing for all action alternatives and the City has completed development of the 145<sup>th</sup> Corridor Study.

See also City's Response to written comments of 145<sup>th</sup> Street Station Citizens Committee submitted Feb 19, 2015 and comments submitted by Lombard on February 4, 2015.

**Terri Benson**

Said she lives just north of NE 145th Street in the Ridgecrest/Paramount Park Neighborhood. She submitted photographs of her great grandmother's log cabin (corner of 155<sup>th</sup> Street and 5<sup>th</sup> Avenue NE), which she would like to see preserved and added to the City's historical register. She said the home was built by her great aunt and uncle after they constructed their larger home in the same location. The City of Shoreline allowed the larger home to be demolished and replaced with a church. She said she will not let the City ruin her neighborhood, which is a tight-knit community that watches out for each other. Little Creek, which is a tributary to Thornton Creek, runs through her backyard. It already floods and additional development will worsen the problem until the golf course and high school are flooded, too.

Ms. Benson said Sound Transit has already proven to be an incompetent group of people. They are extremely over budget and way behind schedule. They are ruining neighborhoods, and the number of riders is low. She commented that transit is supposed to reduce traffic, but she anticipates the proposed plan will create more. She expressed her belief that the rezone needs to be delayed for a minimum of one year so that all of the neighbors can have an opportunity to learn more about the proposal and provide feedback.

**Response:**

Comments are noted. Comments are noted. Chapter 3, Section 3.1 Land Use Patterns, Plans, and Policies addresses the City's Historic Preservation Program which is administered by the King County Landmarks and Heritage Commission. Citizens and/or property owners can seek historic designation under these provisions. Chapter 3, Section 3.4 Streams, wetlands, and Stormwater addresses critical areas such as Little Creek, and flooding. Mitigation measures along with the City's regulations, including the Critical Areas Regulations and Stormwater and Floodplain Management Regulations, will address impacts. Per the City Council's direction, the 145<sup>th</sup> Street Station Subarea process was suspended for over one year, allowing for the development of the 145<sup>th</sup> Street Corridor Study and opportunities for additional public comment.

**John Kropf**

Commented that light rail does not go where people need to go. Planners teach, “Build high rise apartments near the stations.” He and his wife spent 10 days in Singapore, which is said to have the best light rail in the world. He noted that the apartments near the stations were for the poor, with laundry lines shared between adjacent buildings. The apartment unit where he stayed with his daughter was in a modern, 30-story plus building located within a mile of two stations. Although cars cost three times more there, it was cheaper for them to take a taxi than ride public transit. He said recent studies have shown that each taxi type of vehicle in use leads to 15 fewer cars on the highways. He submitted pictures to illustrate his comments.

**Response:**

Comments are noted.

**Marilyn Whited**

Said she did not know about the public hearing and the proposed plans for NE 145th Street until a few days ago. She learned about the proposal from the neighborhood website called Nextdoor.com. She said she travels NE 145th Street often, but never saw a sign announcing the proposal, and she has not received any mailed notices, either. She expressed concern that no one in her neighborhood knows what is being proposed. She also voiced concern that her property, which is 12 blocks away from the station area, is included in the plan. Her neighborhood is cohesive and she raised her family there. The neighbors know each other, and she introduces herself and offers to help people who pass by that she doesn’t know. She recommended that Metro, particularly east/west connections, be made part of the train station activity to limit the need for a huge parking lot. She also encouraged the City to involve more people who live in the affected area. She asked why a station is being planned for NE 145<sup>th</sup> Street, given that there will be stations at Northgate and NE 185<sup>th</sup> Street.

**Response:**

Comments are noted. Comments are noted. Chapter 1 and the Public and Stakeholder Involvement Plan (Appendix) describe the public process the City utilized to engage the public in the planning process for 145<sup>th</sup> Street Station Subarea. Chapter 3, Section 3.3 addresses transportation and includes discussion of bus service to/from the light rail station by METRO. METRO, which is well aware of both the City’s planning and Sound Transit’s, will plan for route changes as necessary. Sound Transit, not the City, determines where stations are to be located at the Lynnwood Link Extension EIS would provide details into this decision-making process.

**Dan Jacoby**

Disagreed with the notion that the City can create a connecting corridor by constructing a long row of tall buildings. The only way to create a connection is through communication or transportation, which is provided by the existing streets. The concept of “connecting corridors”

is planning speak, which is antithetical to transit-oriented development (TOD). He explained that TOD is a concept whereby a mini urban center, including high-density residential along with supporting retail development, is built within easy walking distance of a transit center. By adding a “phony” connecting corridor, you spread out the residential buildings, dissipate the demand for retail near the station, and defeat the purpose of TOD.

Mr. Jacoby also disagreed with the notion of MUR zones on small side streets. He expressed his belief that no one would open a retail store on 152<sup>nd</sup> Street and 6<sup>th</sup> Avenue, and questioned why it is being zoned MUR. He commented that the proposed plan goes against reality. The City needs to remake the map, zoning non-commercial areas for residential use only. He recalled that, for the past few weeks, the City Council has been furiously buzzing over what has become known as the “Roberts Option,” and he commended Council Member Roberts for acting where many others are just talking. Because the neighbors are confident that something that of nature will also happen with the NE 145th Street Station Subarea, he questioned why the Commission should not simply put off their decision on a preferred alternative and direct City staff to create a new plan based on real TOD and legitimate zoning. He reminded the Commission that he offered to help draw the map. Because City staff did not accept his offer, he is working with community members to create a new map. He urged the Commission to direct City staff to work with the community to draw a legitimate map for the preferred alternative; one that ignores planning speak and looks at reality.

**Response:**

Comments are noted. Prefers No Action Alternative. Chapter 3, Section 3.1 Land Use Patterns, Policies, and Plans and Chapter 3, Section 3.2 Population, Housing, and Employment address growth assumptions that underlie the alternatives. The FEIS presents a new, downsized alternative – Alternative 4 Compact Community Hybrid – which retains single-family zoning in certain areas of the subarea. Chapter 2 Description of Alternatives discusses each of the alternatives, including the No Action Alternative. Per direction of the City Council, the 145<sup>th</sup> Street Station EIS process was suspended until completion of the 145<sup>th</sup> Corridor Study and no preferred alternative has been selected. See also City’s comment to written submittal of Jan. 26, 2015.

**Cory Secrist, PhD**

Said he lives in the Ridgecrest Neighborhood. He referred to an old psychological trick called the “illusion of freedom and absence of alternatives.” In other words, when you want to get somebody to do something, you provide them with limited alternatives and ask them to choose between them. In this situation, Shoreline citizens are being asked if they want connecting corridors or a compact community; a decision between options they do not want. As homeowners in the subarea, zoning is their major defense for maintaining the character of their neighborhood. Asking them to give up the current zoning laws is asking for a lot. He recognized the City will have to add new housing to accommodate the inevitable population increase. He referred to Amsterdam, Holland, which is held up as a model example of density

done correctly. The reason it works so well is that their predominant mode of transportation, before densification, was the bicycle. They also have many modes of public transportation. The City is designed with specific lanes for bicycles, pedestrians, etc., and everything is condensed into central areas with shops, work places, and activities. Unfortunately, Shoreline has traditionally been a bedroom community where people commute outside of the City to go to work and shop. While he said he does not particularly want additional density; if the City is going to do it, it needs to be very smart about it. He recommended that zoning be done gradually, based on population demands and the completion of certain milestones for infrastructure (roadways, bicycle lanes, sidewalks, sewer, water mains, parking, public transit, fire safety, trees, wildlife, etc.).

**Response:**

Comments are noted. See also City's Response to your other comments, including written comments submitted on February 18, 2015.

**Janet Way, Shoreline Preservation Society**

Said she represents the Shoreline Preservation Society in an effort to save Shoreline neighborhoods. While she submitted a letter prior to the meeting outlining her concerns, she wanted to reiterate the need for the Commission to postpone their recommendation to the City Council until Sound Transit's FEIS has been completed. She expressed her belief that the DEIS's for the 145<sup>th</sup> and 185<sup>th</sup> Street Station Subareas are fatally flawed because they do not consider how each will impact the other. The Society believes the proposal will result in significant adverse environmental impacts. They do not want to choose between the two plans, as they do not support either one. They support phased and transitional zoning as certain elements are completed such as the 145<sup>th</sup> Street Corridor, light rail station, etc. She also said it is important that all comments, including those provided during "general public comment," should be included in the record.

Ms. Way said affordability is very important. She told a story about her neighbor, a senior citizen who has paid off her home. Because she has no mortgage, her home is affordable, but she can't afford to move somewhere else and pay rent. She asked that the DEIS be corrected to show that Littles Creek is ¼ mile, not ½ mile, from the station. She said the 145<sup>th</sup> Street Corridor is crucial. The fact that it will not be completed in time for the light rail station is a disaster waiting to happen. She said neighborhood circulator buses are needed to support the light rail service.

Ms. Way read a section of her letter, stating that the Society believes there are many problems with the proposals and the impacts have not been studied. The letter recommends that the Planning Commission remand the proposal back to staff and that the DEIS should be combined in an SEIS together with the 185<sup>th</sup> Street Station Subarea to properly study the total impacts to our community environment. The success of the light rail stations should not hinge on the amount of high-density development they inspire, but instead just having them function smoothly in the existing neighborhoods. Having community support is more important than ramming through an unpopular

rezoning scheme to make transit advocates happy. Lastly, she expressed support for Mr. Derdowski's recommendation that the City adopt project-level impacts for SEPA review.

**Response:**

Comments are noted. The City will comply with SEPA, 43.21C RCW, and its implementing regulations if it elects to adopt a statutorily-authorized planned action ordinance. This FEIS will serve as the basis for that ordinance. The FEIS acknowledges concurrent projects, including the adopted 185<sup>th</sup> Street Station Subarea Plan, and the resulting impacts and mitigation measures for the two subareas are being considered concurrently. Sound Transit issued the Lynnwood Link Extension FEIS in April 2015; the FEIS reflects this fact. The City has completed the 145<sup>th</sup> Corridor Study and it is incorporated in Chapter 3, Section 3.3 Transportation. The FEIS considers the concept of phased zoning for all action alternatives. Chapter 3, Sections 3.1 and 3.2 address changes in land use patterns, population, and housing, including the effect of market trends/demands. Sections 3.4 and 3.5 address impacts to critical areas, including streams and wetlands, open space, parks, and natural areas. In addressing these impacts, the City has referenced several studies including those related to the Thornton Creek Watershed. See Chapter 5 References. Chapter 3, Section 3.3 addresses multi-modal transportation impacts and includes the need for public transportation services, most of which are under the control of METRO and Sound Transit.

Jackson Park Golf Course is located in the City of Seattle and therefore the City of Shoreline has no regulatory authority over its development.

See also City's Response to written comments submitted by Shoreline Preservation Society on January 30, 2015 and February 5, 2015.

**Marla Kempf**

Said she and her husband have lived in Shoreline for 28 years, and they have watched the City evolve. She is not opposed to change and believes that planned change is better than unplanned change. She is glad to see the City is planning ahead for the inevitable changes that will come. However, she supports slowing down the process. She said the proposed building heights and densities are too much for the existing infrastructure, as voiced by many of those who commented previously. Upon inquiring of City staff, she was told that the idea of the "Green Network" was to connect the Interurban Trail with the Burke Gilman Trail at some point in the future. It would really be an extension of the Interurban Trail and would provide no solution for getting pedestrians and bicycles over the freeway to the light rail station. Interurban trails draw people into places they would not normally go, and crime rates are typically higher. She encouraged some research be done about the types of activities that happen along these trails. She cautioned that it does not make sense to run a trail in front of driveways where people, bicycles and cars will be colliding. Sidewalks are good and are an important part of the infrastructure needed in any development and growth that takes place in the area, but the Interurban Trail should be along a main street and designed

similar to the Burke Gilman Trail, which runs along a busy road but does not have individual homeowners' driveways crossing it. Lastly, she expressed her belief that NE 145th Street is currently inadequate for the proposed growth.

**Response:**

Comments are noted. The "Green Network" concept is included within all action alternatives. Chapter 3, Section 3.3 addresses multi-modal transportation impacts, including measures to address bicycle and pedestrians needs such as bike lanes and sidewalks. The City, in conjunction with other regulatory jurisdictions including City of Seattle and King County, has prepared the 145<sup>th</sup> Street Corridor Study and this Study is incorporated in Chapter 3, Section 3.3

**Jan Stewart**

Said she lives in the Ridgecrest Neighborhood, north of NE 145th Street between 8<sup>th</sup> and 12<sup>th</sup> Avenues (near the Paramount Park Open Space). She said she does not favor either of the proposed alternatives for the reasons stated by previous speakers. She said she would like to understand the policy or mechanism that allowed her neighborhood to be taken from the Southeast Subarea Plan and placed in the 145th Street Station Subarea Plan. She read the following excerpt from the Southeast Subarea Plan that was adopted in 2011, *"The plan is intended to provide direction for the next 20 years. Many things will change in that time period. By 2030, there will likely be a light rail station near NE 145th Street and Interstate 5. New automotive technology may have transformed the fueling, design and maybe even the necessity of cars. Successive generations may have different preferences for building and neighborhood design and amenities. New technologies may spur new industries and the job base and commercial districts will likely grow and evolve. Yet, while contemplating these uncertainties and determining how to incorporate them into the long-range vision for the subarea, the City wants to preserve existing aspects of these neighborhoods. The single-family character, friendly atmosphere, natural amenities, and other characteristics are all of paramount importance."* Although Ms. Redinger commented previously that the Southeast Subarea Plan was really a policy document, there was zoning attached to it. If zoning can be changed that quickly, without notice to the neighbors, then maybe they don't need to worry about the current zoning plan.

**Response:**

Comments are noted. Based on public comment, the FEIS addresses the overlap of the Southeast Neighborhood Subarea and the change needed in the area based on the light rail station. See Chapter 3, Section 3.1 Land Use Patterns, Policies, and Plans. The 145<sup>th</sup> Street Station Subarea process is a multi-year process, starting in 2011 with final adopted anticipated to occur in Fall/Winter 2016. Chapter 1 and the Public and Stakeholder Involvement Plan discuss the variety of avenues the City utilized to engage the public in the process; a process that is still continuing. The FEIS considers the concept of phasing for all action alternatives.

See also City's Response to written comments submitted on February 5, 2015.

**Shanna Sierra**

Said she lives just south of Paramount Park. She stressed that her neighborhood is tight knit and desirable. She urged the Commission to postpone their recommendation until Sound Transit's FEIS and the 145<sup>th</sup> Street Corridor Study have been completed. She also recommended a phased approach. While she supports an EIS that allows the City to plan infrastructure for the future, zoning changes should occur piece-by-piece to address potential impacts and concerns. Slowing down does not mean the neighbors are okay with the plan, because they are not. The proposed height is wrong, regardless of whether it is phased or not. Neither a 65 nor 85-foot height limit would lend to the neighborhood feel, and the sun would be blocked. She urged the City to keep the growth along the corridor before encroaching into the residential neighborhoods.

**Response:**

Comments are noted. Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact. The City has completed the 145<sup>th</sup> Corridor Study and it is incorporated into Chapter 3, Section 3.3 Transportation. The FEIS considers the concept of phasing for all action alternatives.

**John Behrens**

Asked that his previous comments (under general comment) be attached to the record for the 145<sup>th</sup> Street Station Subarea Plan. He said that while it is nice to draw maps and make plans and projects that look 50 to 100 years into the future, it is important to understand that development will be controlled by costs. The discussion should include information about how much development within the subarea will cost. He noted that 1,000 square foot units in the building being constructed at 152<sup>nd</sup> Street and Ashworth Avenue will rent for \$2,000 per month. This is similar to the cost of units at Echo Lake, where development costs of the apartment units were buffered by the sale of the condominium units. Both of the sites were previously occupied by trailer parks and the property costs were low. He referred to the TOD that is being constructed at NE 145th Street and Lake City Way, which will be anchored by very expensive single-family homes, with 45-foot tall town houses around the four corners of the development. This is vaguely familiar to what is being proposed for the 145<sup>th</sup> Street Station Subarea. The townhomes are being advertised as starting in the mid to upper \$400,000, but he estimates they will actually sell for over \$500,000. He noted that the cost of accumulating lots one at a time will be much higher than building on a former trailer park or one lot. He asked if ten years from now when development occurs, will they be looking at town homes that cost \$600,000 to \$700,000? That is not the neighborhood he moved into. He asked the Commission to be practical, and make a recommendation to the City Council that is based on the actual cost of development and reality.

**Patty Hale, on behalf of Ridgecrest Neighborhood Association**

Said she was present to speak on behalf of the Ridgecrest Neighborhood Association Board of Directors. She thanked the Commissioners and staff for their work, but asked them to start over. Other than no plan, none of the alternatives are acceptable to the neighborhood or the board as a whole. She reviewed that true development of the Ridgecrest Neighborhood started following World War II, with homes built for returning veterans and their families, many of whom still live in the neighborhood. Although many of the houses in the neighborhood are paid for, residents will be forced out by the increase in taxes to support the suggested levels of development. She noted that Ridgecrest is geographically the largest neighborhood in the City, and most of it is single-family homes. It is a working class neighborhood, with the highest number of women in the workforce and the highest number of Native American residents. The neighborhood is already considered one of the most affordable, and they don't need more. It also has the lowest average income. Ridgecrest is currently zoned almost entirely R-6, but the current build out is closer to R-4. It is a friendly neighborhood, unlike apartment living where people ignore their neighbors.

Ms. Hale recalled that several have suggested that some aspects of change would be great, such as coffee shops and community gathering places. However, effective January 1<sup>st</sup>, the City Council implemented a \$10,000 transportation tax for new businesses that change existing use or amount of traffic to a new business. A current business inquiry in Ridgecrest probably will not happen because it cannot afford the additional \$10,000 cost. She expressed concern that the proposed plan would totally annihilate the southern half of the Ridgecrest Neighborhood. Additional development could result in enough density for Ridgecrest to become its own city and they could advocate away from the City of Shoreline.

**Response:**

Comments are noted. Chapter 3, Section 3.1 and Section 3.2 discuss market trends and housing needs. Section 3.3 addresses transportation impacts and recognizes the City's statutorily-authorized impact fee ordinance. In 2016, the City exempted certain types of business from the impact fee until Dec 2018 (SMC 12.40.070(l)).

**Ray Berntsen**

Said he lives near the Roosevelt Station in Seattle and purchased another home a year ago after Sound Transit announced its preferred station location at NE 145th Street. He worked more than six months to rehabilitate the house so it could be rented at a reasonable rate. His purchase was based on the certainty that having a station close by would afford the people who live in the neighborhood the ability to get to work at the University of Washington in just 15 minutes and downtown Seattle in 20 minutes. This reliability is a privilege that very few people in the region will have in the future, making it very valuable. He applauded the subcommittee for trying to maximize access to this valuable resource and supports the compact community concept (Alternative 3). As others have noted, he does not think there is much

advantage to spreading development of Phase 1 along the arterials as shown in Alternative 2 (Connecting Corridors); and there would not be much advantage to the geographic stints in either of the two action alternatives.

Mr. Berntsen agreed with previous speakers that the rezone should be limited to the ¼ mile walk shed, and the second phase should be tied to improvements that expand the walk shed. For example, expansion of the rezone on the west side of Interstate 5 should be tied to construction of a pedestrian bridge towards Twin Ponds, and expansion of the rezone along 145<sup>th</sup> and up 15<sup>th</sup> should be tied to transit improvements such as a circulator between the 145<sup>th</sup> and 185<sup>th</sup> Street Stations. He expressed his belief that Little Creek would make a great trail, and connecting it to the current trail system around Jackson Park would be a great amenity to improve walkability of the entire region. In addition, he suggested the City work with Sound Transit to recoup some of the imminent domain properties along Interstate 5 and make a bicycle trail connection between the two stations.

As a civil engineer and consultant, Mr. Berntsen said he said he has worked with Sound Transit on their east link alignment, the university link expansion, and the South 200<sup>th</sup> Station. They are very receptive to public comment and to the municipalities they are working in. Coming at them from a position of strength with a preferred alternative is a very good idea that has been used successfully in other locations to get maximum improvements by tying the neighborhood impacts to the future value of properties based on maximum build out. He said it is to the neighborhood's advantage to spread the cost of all the improvements in the area onto Sound Transit if the zoning is pushed forward prior to their design.

**Response:**

Comments are noted. Supports Alternative 3 Compact Community with no advantage if phased. Chapter 1 and Chapter 2 describe the development of the alternatives, including the use of study area boundaries developed on walk sheds. Chapter 3, Section 3.3 Transportation addresses non-motorized methods of transportation including bicycle corridors which is discussed in the Off-Network Bicycle plan. The City is and will continue to work with Sound Transit as it develops the light rail system through the City.

**Chad Ross**

Said he also lives in the Ridgecrest Neighborhood and his back door opens to the south end of Paramount Park. He and his wife purchased their home five years ago because they desired to have a single-family home with a backyard where they could grow their own fruits and vegetables. They are afraid of how the proposed plan will impact their neighborhood, and request that the panhandle be moved from Phase 1 to Phase 2. In addition, he requested that the dead end on 10<sup>th</sup> Avenue at 152<sup>nd</sup> be made permanent. They like having a quiet street, and want it to remain as such. He encouraged the Commission to slow down and reconsider the proposal to make sure the

neighborhoods are preserved. Commercial development belongs on Aurora Avenue North where there is public transportation and open lots that are available for large scale buildings.

**Response:**

Comments are noted. The FEIS considers phased zoning for all action alternatives.

**Dan Dale**

Said he supports extending the schedule for the two station subareas to give the City Council and Planning Commission time to consider the options. However, he suggested the timeline be adjusted further to wait three additional weeks for the release of Sound Transit's FEIS before making a final decision on either of the plans. If for no other reason, this slower schedule would be better from a public relations standpoint. Once Sound Transit's FEIS is available, the City will have clearer information about their plans for the parking garage and the properties immediately adjacent to the station area.

**Response:**

Comments are noted. Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact. Per City Council direction, the 145<sup>th</sup> Street Station Subarea process had been suspended for approximately one year, allowing for the development of the 145<sup>th</sup> Corridor Study and providing opportunity for additional public comment.

**Brad Rogers**

Said he is on the steering committee for the trail that goes around the Jackson Park Golf Course. He expressed support for the earlier recommendation to link the trail near Littles Creek to the Jackson Park Trail. He also asked the Commission to postpone their recommendation until the Sound Transit FEIS is available so they have a clearer picture of how future development at the transit station can integrate with properties to the south. At this time, Sound Transit has not provided any information about what will happen between Northgate and NE 145th Street.

**Response:**

Comments are noted. Sound Transit issued the Lynnwood Link Extension EIS in April 2015; the FEIS reflects this fact.

## ***Responses to Spoken Comments from the April 7, 2016<sup>3</sup> (Discussion on Zoning Alternatives and Preferred Alternative for FEIS)***

### **Dave Lange**

Commented that if the City cares about community and energy usage, getting people around businesses is job one, and getting busses running between town centers and transit is a close second. He recalled that he has previously mentioned several problems with the City's implementation of transit-oriented development (TOD), which works best with an existing business base and when business and transit is plentiful and regular in the middle of density. Ridgecrest is, at best, a half circle for development with a squishy wetland for 1/3 of it. TOD works well when the transit center is located within a pedestrian hub of activity, and he agreed with Commissioner Mork's assessment that the 145<sup>th</sup> Street Corridor Study has failed its pedestrian mandate. He suggested it is time to think of 145<sup>th</sup> Street as the City's bus center and punt the idea of it being a walkable community.

Mr. Lange questioned if quadrupling the density of housing and only tripling the number of car trips around 145<sup>th</sup> Street would improve walkability. He expressed his belief that, unless the 145<sup>th</sup> Street Corridor Study is revamped, there is little a new Sound Transit station can do to get out of the way of Shoreline's compact development. Instead of cars on 5<sup>th</sup> Avenue, they need busses there in order to link more of the City with transit and link more transit users with the town centers. Without bus lanes on the overpass, there won't be abundant transit around 145<sup>th</sup> Street. Cars would get 6 lanes, un-motorized transportation would get 2 lanes, and busses would fend for themselves. Given the mistake Sound Transit has built into their station (busses for one route running 7 days a week and up to 19 hours a day at 10-minute intervals), he feels justified to ask for no change in zoning from 145<sup>th</sup> Street to 155<sup>th</sup> Street and from the freeway to 12<sup>th</sup> Avenue. If they encroach on the borders and make 5<sup>th</sup> Avenue into East Northgate Way, there will be police directing traffic for years and emergency meetings at some point in the future. They can change some parts of the station, but staying on the current rail corridor has its limits. He urged the Commissioners to think carefully of their responsibility and their interest in driving in the area.

### **Response:**

Comments are noted. Chapter 3.3 addresses multi-modal transportation needs including acknowledgment about the need for METRO and/or Sound Transit to provided bus service to/from the light rail station. The April 2015 Lynnwood Link Extension FEIS is reflected in the FEIS as is the 145<sup>th</sup> Corridor Study.

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<sup>3</sup> Only responses are provided to these comments for brevity. Verbatim testimony for the Planning Commission's April 7, 2016 meeting is available at: <http://www.shorelinewa.gov/government/departments/planning-community-development/planning-commission/meeting-agendas-and-minutes/-toggle-allpast>

**Shoreline Preservation Society (Dr. Sarah Cooke)**

Said she represents the Shoreline Preservation Society. She submitted written comments and asked that the Commissioners also refer to the comments she previously submitted on March 10<sup>th</sup>. She referred to the proposed Compact Community Hybrid Alternative and said her comments would focus on the southwest sector adjacent to the Paramount Open Space (between 10<sup>th</sup> and 9<sup>th</sup> Avenues NE). She specifically referred to a small stream that stops just short of crossing 10<sup>th</sup> Avenue NE and pointed out there is an inconsistency with the City's GIS map. Currently, there are three tributaries that feed the area that is proposed for MUR-35' zoning. Although this area has been mapped by the City, the stream tributaries that currently pass through the backyards of every single residential lot to the west of 10th Avenue NE have not been included. Many of the lots are associated with wetlands, but none have been mapped. She concluded that zoning an area that is encumbered by critical areas to MUR-35' will be very problematic, if not virtually impossible.

Dr. Cooke referred to the inaccuracies she pointed out in her March 10<sup>th</sup> letter and said it is problematic for her to believe that the Commission can accurately evaluate the proposals that have been presented. Even after spending substantial money, it will be very difficult to know what is and is not accurate, especially since the database in place before the recent studies is more accurate than the new information. She asked the Commission to read her letter.

**Response:**

Comments are noted. See City's Response to written comments submitted on March 10, 2016 and April 7, 2016.

**Shoreline Preservation Society (Janet Way)**

Referred to a letter that was submitted just prior to the meeting by attorney's representing the Shoreline Preservation Association. She requested an extension of the comment period so that all pertinent information can be submitted before the Commission forwards a recommendation to the City Council. She commented that the Shoreline Preservation Society has concerns about the Planned Action Ordinance that will come before the Commission at some point in the future. If the ordinance is going to be part of the subarea process, it is important to keep in mind that State Law requires project level analysis as part of the FEIS. Although the City is saying that environmental review will be done as development is proposed, there is no project level analysis in the DEIS for the developers and/or the City to go by. With the Planned Action Ordinance, the public would be excluded from the process and would have no opportunity to comment or appeal. Any information to add to the discussion about critical areas, traffic, etc. will come only from the FEIS. She expressed her belief that adopting a Planned Action Ordinance would be a harmful environmental impact.

As mentioned by Dr. Cooke, Ms. Way said there are many errors in the addendum to the DEIS, and even the proposed Preferred Alternative has an error in that the creek is not identified. For these reasons, the public comment period should be extended, and there should be a separate notice for the Planned Action Ordinance to carefully consider the consequences. She said the society is asking that more Residential (R) 6 zoning should be retained. As mentioned by Dr. Cooke, the area west of Paramount Park is wetlands and streams run

through the backyards. This entire area is critical to the wetland and should be considered for R-6 zoning. She recommended that the steep slope along 10<sup>th</sup> Avenue NE should also be considered for R-6 zoning, as well as the houses on top of the slope.

Ms. Way said the Society is in favor of a Critical Areas Overlay, and the parks should not be part of the rezone. The Society would also like the Commission to consider potential impact fees. Currently, the City has an impact fee for transportation, but none for parks, schools, or other needed infrastructure. The Society would like the Commission to defer consideration of the DEIS until the 145<sup>th</sup> Street Corridor Study has been completed. She recalled that at the April 5<sup>th</sup> special meeting of the Planning Commission, it was obvious that many things were still unclear. She recommended that the City should have a Capital Facilities Plan in place before adopting the intensive zoning designations. She asked that the Commission consider the letter from the Society's attorney, as well as other letters that have been submitted.

**Response:**

Comments are noted. The FEIS contains a new alternative – Alternative 4 Compact Community Hybrid – that retains low-density residential zoning along a majority of the large parks within the subarea (Twin Ponds, Paramount Park, and Paramount Open Space). The 145<sup>th</sup> Corridor Study is completed and has been incorporated within Chapter 3.3 Transportation of the FEIS. Impacts to Parks is addressed in Chapter 3.5 and to Schools in Chapter 3.6. Mitigation measures include the consideration of impact fees; the City has no outright authority to impose a school impact fee unless requested by the school district. See City's Response to written comments submitted on March 17, March 21, and April 7, 2016.

**Liz Poitras**

Referred to an area identified on the Compact Community Hybrid map, which shows two rectangles of MUR-45' zoning east and west on 5<sup>th</sup> Avenue NE and north of 155<sup>th</sup> Street. She requested the following changes:

- No rezoning north of 157<sup>th</sup> Street on both sides of 5<sup>th</sup> Avenue NE.
- The remaining chunk of the MUR-45' rectangle shown on the east side of 5<sup>th</sup> Avenue NE should be divided into MUR-35' in the north portion and MUR-45' in the south portion, or it could all become MUR-35'.
- Continue the strip of MUR-35' that is south of 157<sup>th</sup> Street all the way to 5<sup>th</sup> Avenue NE.

Ms. Poitras explained that most of the perimeter of the two combined MUR-45' areas on the map will remain R-6. Since the beginning of the project, the City has stated that it is important to buffer the R-6 areas from MUR-45' and higher zones. She pointed out that most of the homes in this area are 1 and 1.5 stories, not even close to the maximum height allowed for R-6 zones. The Compact Community Hybrid map shows that there is no road in this area to separate the MUR-45' from R-6 zoning. In addition, the topography of the area slopes downward going west from 5<sup>th</sup> Avenue NE, and even the land that abuts the west side of 5<sup>th</sup> Avenue NE is below the grade of the street.

The elevation at the intersection of 5<sup>th</sup> Avenue NE and 156<sup>th</sup> Street is 409.7 feet compared to an elevation of 355 feet at the west end of 156<sup>th</sup>. This equates to a difference of 54 feet. For the R-6 homes west of the proposed MUR-45' zones, 45-foot buildings would seem even taller than 45 feet. She summarized that, with her proposed changes, there would be no MUR-45' abutting R-6 zoning, and businesses on arterial streets would be allowed in the MUR-35' zone.

**Response:**

*Comments are noted.*

**Thornton Creek Alliance (John Lombard)**

Said he represents the Thornton Creek Alliance, which includes residents of both Shoreline and Seattle. He explained that the upper third of the Thornton Creek Basin is within the City of Shoreline. He said the Alliance supports the Compact Community Hybrid as the best of the alternatives considered by the Commission. They appreciate the careful thinking and balancing of concerns that has gone into it, and they believe that staff has made a persuasive case against phased zoning, particularly with the current proposal. The Alliance also supports the revised Off-Corridor Bicycle Network, which adds a path through the Paramount Open Space, over the Green Network that was considered as part of the earlier Compact Communities Alternative. The Alliance supports maintenance of R-6 zoning adjacent to the Paramount Open Space and Twin Ponds Park; not just because of the reduced pressure on wetland habitats it would create, but because it supports the larger landscape approach to habitat that the Alliance articulated in its comments at the last Commission meeting and in its letters. As noted in the Staff Report, even left as R-6 zoning, the areas will likely see substantial redevelopment, which will have to meet the updated requirements of the Critical Areas Ordinance.

Contrary to Otak's report and based on their own map (Figure AW-1), Mr. Lombard said it does not appear that any of the single-family homes to the east of Paramount Open Space are actually located in wetlands. However, many of these parcels are entirely within the buffers, which means that any redevelopment on them will continue to be nonconforming, whether it is R-6 or the denser zoning. He summarized that the Alliance appreciates the support of the City's Parks, Recreation and Tree Board for acquisitions to expand parks and protect wetlands around Paramount Open Space. They support the staff recommendation that any new development using the new zoning must be outside of wetland and stream buffers.

**Response:**

Comments are noted. Supports Alternative 4 Compact Community Hybrid in conjunction with the Off-Corridor Bike Network and the Green Network concept. Wetlands are addressed in Chapter 3.4 as well as in the DEIS Addendum in regards to Paramount Park and Paramount Open Space. Chapter 3.5 addresses parks and natural areas/open space.

**Joe Cairo**

Said he has lived in the Pacific Northwest since 1967 and has seen the area go through a lot of change. He has seen planning commissions and councils create plans that they were sure would solve problems but failed over and over again. He said he is particularly troubled that there are errors in the City's maps. He said he recognizes that change is coming and there will be more density. However, he is concerned about allowing this increased density to expand into the existing neighborhoods that make Shoreline great. Shoreline is a suburb and offers a great place to raise a family. However, he is concerned about increasing the ratio of unrelated single adults who are not stakeholders. These people are typically not interested in keeping the schools good and helping the community thrive and prosper. Absentee landlords and property managers should not become the order of the day in the neighborhoods. He encouraged the Commission to keep the increased density closer to the transit center rather than letting it expand into the neighborhoods.

**Response:**

Comments are noted. Supports focusing increased density near light rail station.

**Frank Shields**

Said he owns property near the 145<sup>th</sup> Street Station and he supports the proposed Compact Community Hybrid Alternative. It appears to strike an appropriate balance and is well thought out. He expressed his belief that the community, in general, greatly needs the light rail system. The traffic is already horrible and the City is growing rapidly. For the new light rail system to work, there will need to be high nodes of density in order to maximize the number of people who can access the station via walking. Creating more density close to the station is the right approach, and it will give citizens of Shoreline an opportunity to enjoy the benefits of the light rail amenity. He said he believes that light rail will be fabulous amenity for Shoreline, and it will increase property values in the area.

**Response:**

Comments are noted. Supports Alternative 4 Compact Community Hybrid

**Dia Dryer**

Commented that the map staff prepared to illustrate the Compact Community Hybrid Alternative is deceptive and is a visual riddle about which match stick is larger. She noted that Interstate 5 is nearly ¼ mile wide. Decades of studies have been done, both in and out of Washington, that repeatedly shown that a ½ mile walkshed is the generally-accepted limit of range and that ¼ of a mile is the primary increase in ridership. Although she does not live next to either of the parks that have been discussed so significantly, it does not change the fact that her voice is the same and she pays the same property taxes. She emphasized that the hybrid map is vague and her points may be mute. However, if there is still consideration of phased zoning, it needs to be approached logically. It is concerning to her that the MUR-35' zoning on the west side of Interstate 5, which is beyond a ½-mile walkshed, is included in all options. She is also concerned that if phased zoning were to be applied, the maps she has seen have excluded blocks that are within the ¼-mile walkshed from Phase 1. This will push development to the outskirts of the subarea. She observed that while MUR-35' and MUR-45' along 15<sup>th</sup> Avenue NE is considered Phase 1, it

should be noted that most properties have already been developed to that standard. She pointed out that the majority of what was included in Phase 1 of the 185<sup>th</sup> Street Station Subarea Plan was within a ½-mile walkshed. There are also a few instances where Phase 2 and even Phase 3 were within a ½-mile walkshed.

**Response:**

Comments are noted. The FEIS considers phased zoning for all action alternatives. The 145<sup>th</sup> Subarea Plan and its implementing zoning are still subject to public review and comment with the City Council not anticipated to take final action on the proposal until Fall/Winter 2016. Chapter 1 and Chapter 2 discuss how the alternatives were developed including the creation of the walk shed areas.

**Lorn Richey**

Asked that the Commission base its decisions relative to zoning around the light rail stations on what is best for Shoreline residents. Focusing first on the residents' use of the light rail is the surest method of assuring the future success of the project for the entire community. Shoreline already has something that works, and they should be looking at the best way to integrate light rail into it. He cautioned that the Commission should not vote in favor of the Preferred Alternative thinking it will be an economic stimulus plan, since this gamble has been tried unsuccessfully elsewhere. While it may benefit a few, it does not benefit the general population. They should not vote for the Preferred Alternative thinking it will create more moderate priced housing and help low-income people and people of color. The Black Lives Matter movement attended a recent Town Hall event and confronted the Mayor on the very aggressive, dense zoning propositions and gave a brilliant critique of how it actually hurts people of color and the poor. Lastly, they should not vote to support the Preferred Alternative based on environmental tradeoffs. While light rail will help the environment and there are a lot of benefits to increased density, the City should be very careful in how density is integrated in the neighborhoods that are already functioning well. There was a big rush to approve the 185<sup>th</sup> Street Station Subarea Plan, but if it had been done right, it could have become a model of sustainability and ecological integration with the neighborhood and existing environment. They now have a very aggressive plan in place that may not be best for the residents.

**Response:**

Comments are noted. The FEIS does not identify a preferred alternative.

**Yoshiko Saheki**

Encouraged the Commission to reject the Staff's recommendation to remove the R-6 zoning near parks just so that MUR-35' zones can be studied in the FEIS. She voiced concern that the FEIS would be conducted by Otak, who wrote the Wetlands and Streams Assessment Technical Memorandum and concluded that rezoning would be better for critical areas. She suggested there is something circular about the relationship between the Otak Assessment and the forthcoming FEIS. She would have been more comfortable if the two documents were prepared by different consultants, and she is doubtful that that the same consultant will come to a different conclusion in the FEIS.

Ms. Saheki said the technical memorandum at least got a couple of things right through reconnaissance. Specifically, Otak was correct in the classification of the large wetland in Twin Ponds Park, which requires a buffer of 165 feet. While Otak did not delineate the wetlands in Twin Ponds Park, the Parks Department separately commissioned a wetland delineation. The report is not yet finished, but boundary flags have been placed in the park by the wetland biologist. These flags have been placed on the property line between the park and the houses on the north side of N 149<sup>th</sup> Street. If Otak is correct in its classification of the Twin Ponds Wetland, the buffer zone will cover not just the houses on the north side of N 149<sup>th</sup> Street; it will also encroach on the properties on the south side of N 149<sup>th</sup> Street. Therefore, she asked that the Commission include the south side of N 149<sup>th</sup> Street for R-6 zoning. She recognized that, at some future date, some of the properties could become part of the expansion of Twin Ponds Park, but that is mostly speculative at this stage. Therefore, it is important for the City to do its best to protect the existing public wetlands. She reminded the Commission that after Aegis Assisted Living was built, a body of water on private land was lost. She summarized that keeping the present zoning will best serve the wetlands and Twin Ponds Park.

Ms. Saheki commented that there has been a lot of new information lately, including a Planning Commission meeting on April 5<sup>th</sup>. It seems it would serve the process if the Commission were to continue the discussion and collect more public comment after tonight's hearing. She asked that the Commission delay their recommendation to the City Council for at least a few weeks.

**Response:**

Comments are noted. The FEIS analyzed a range of alternatives which included rezoning properties adjacent to Twin Ponds Park, Paramount Park, and Paramount Open Space from low-density residential to MUR 35. Chapter 3.4 addresses wetlands and incorporates the information from the DEIS Addendum.

**Michael Jensen**

Said he lives within the subarea boundaries and loves his neighborhood. He also values light rail and recognizes there is opportunity in what the neighborhood can become. He commented that zoning typically guides what the neighborhood can become, and details matter. However, many of the risks to the neighborhood have much to do with the when and how of redevelopment. He recalled that the City's Planning Director indicated she had similar concerns when she asked for advice from other planning colleagues in September of 2014. She said, "This opens a lot of single-family zoned property up for redevelopment. We are concerned that, if opened up all at once, redevelopment will not transition well from the old to the new (spotty)."

Mr. Jensen recalled that phased zoning was the proposed solution, and the City Council adopted the approach as part of the 185<sup>th</sup> Street Station Subarea Plan using the following language from Ordinance 706, "A phased-zoning approach provides for a more predictable pattern of redevelopment, insuring a cohesive, connective community that is supportive of transit while providing an opportunity to monitor development prior to allowing redevelopment of the entire area in a manner that could be inconsistent with the vision for the subarea."

Mr. Jensen emphasized that the residents of the 145<sup>th</sup> Street Station Subarea want these same benefits, and the former preferred alternative included phased zoning for blocks around the natural areas. However, the staff has now dropped phased zoning from the latest recommendation, despite admitting there were issues that it could help solve and despite the fact that by excluding it now they were eliminating it from consideration down the road. He said he disagrees with the reasons provided in the Staff Report for recommending against a phased approach. The report states that if Seattle is in charge of what happens south of 145<sup>th</sup> Street, there is no longer a reason to care about the sequence of development north of 145<sup>th</sup> Street. While spotty development was considered bad in the 185<sup>th</sup> Street Station Subarea, the Staff Report indicates that it would be good in the 145<sup>th</sup> Street Station Subarea because it would allow more variety of housing styles. Lastly, the Staff Report suggests that developers will not start building the densest, central buildings until after the light rail station opens in seven years. To allow more redevelopment to occur as soon as possible, the new recommendation turns the prior one on its head and encourages peripheral blocks, including those adjacent to natural areas, to redevelop first and the central core to redevelop second. He suggested this is backward and he questioned why the rush. He encouraged the Commission to take the extra time to get it right. He summarized that sequence matters. The results will be suboptimal if redevelopment happens from the edges towards the center. The quality of life during transition will also be worse if a lot of additional people and their cars arrive before new infrastructure is in place. He asked the Commission to consider phasing in the 145<sup>th</sup> Street Station Subarea, including blocks near natural areas. He asked them to guide the pace of change enough that it gets done right.

**Response:**

Comments are noted. The FEIS considers the concept of phased zoning for all action alternatives. Chapter 3.3 Transportation includes the results of the 145<sup>th</sup> Corridor Study, a roadway located outside of the City's municipal boundaries.

**Steve Schneider**

Said he also lives within the subarea. He appreciates the April 5<sup>th</sup> meeting, which was very informative and allowed citizens an opportunity to interact with the Commissioners. He voiced concern that the maps presented at the April 5<sup>th</sup> meeting appeared to be incomplete, and the plan does not address how to deal with 145<sup>th</sup> Street when residents from Bothell, Kenmore, Lake Forest Park, etc. are planning to access the light rail station via bus. He observed that the busses will not provide easy access to the station because 145<sup>th</sup> Street is only two lanes. He recommended the Commission postpone its recommendation to the City Council until they have addressed exactly what will happen with 145<sup>th</sup> Street, which will be a major thoroughfare to and from the light rail station.

**Response:**

Comments are noted. The 145<sup>th</sup> Corridor Study has been completed and is incorporated into Chapter 3.3 Multi-Modal Transportation. The needs for bus service to/from the station by METRO and Sound Transit is addressed in that chapter. The Lynnwood Link Extension FEIS (April 2015), which is reflected in the City's FEIS, establishes mitigation measures for traffic impacts arising from Sound Transit's light rail system.

### **Ginny Scantlebury**

Commented that in all of the planning to date, she does not believe that enough has been done to address traffic issues. The larger population will create a need for more police and fire resources, which are already stretched. Schools and utilities must also be addressed as part of the infrastructure plans. She recalled that citizens raised infrastructure concerns at multiple hearings for both the 185<sup>th</sup> and 145<sup>th</sup> Street Station Subarea Plans, but they were ignored.

Ms. Scantlebury recalled comments made in 2015 by City Council Members to City residents who attended a meeting regarding the 185<sup>th</sup> Street Station Subarea Plan. City Council Members said not to worry about massive redevelopment happening overnight as the process will be very long and nothing will happen for quite some time. However, as soon as the ink dried and the up-zoning occurred for the 185<sup>th</sup> Street Station Subarea, residents started getting slammed by developers and realtors harassing them to purchase their properties. It has even started in the 145<sup>th</sup> Street Station Subarea, although nothing has been finalized. She encouraged the City to be truthful with citizens. She also asked the Commission to postpone action until more study has been done.

#### **Response:**

Comments are noted. Chapter 3.3 addresses multi-modal transportation issues and incorporates the 145<sup>th</sup> Corridor Study. Chapter 3.6 address impacts in regards to public services such as police and fire, with fire being a separate and distinct governmental entity from the City. Chapter 3.7 addresses the impacts to utilities. The FEIS recognizes that trends in development are driven by market forces and property owners decisions to buy or sell their property, both of which are not within the City's control.

### **Lindsay Hanna**

Said she recently purchased a home within the subarea because she was excited about the proposed light rail amenity. She has been following regional growth trends and the Puget Sound Regional Council (PSRC) estimates that by 2040, there will be 1 million new people in the area. A number of people have encouraged the Commission to slow the process down and postpone their decision. However, it is important to note that over the past year, 63,000 new people came to the region. She recognized that deciding where to accommodate the additional growth is difficult, but change and growth will continue to occur. A huge public investment will be made for the new stations, and it is the City's responsibility to the public and future generations to ensure that as many people as possible can use the asset. When thinking through different alternatives, she noted there are pockets of single-family homes. She encouraged the Commission to consider whether this decision was based on something that is ecologically threatening to the parks or something else. She urged them to consider how important it is that as many people as possible can live within walking distance to light rail. Whether they like it or not, people will be moving to the area, and they will need a place to live and she supports compact growth around the light rail stations.

#### **Response:**

Comments are noted. The FEIS presents a range of reasonable alternatives that provides for a variety of growth scenarios at varying intensities/densities.

**Tom Lawler**

Said he supports the Connecting Corridor Alternative because he believes development would be stronger when connected to other areas of development. Particularly, he suggested that the rezoning of 155<sup>th</sup> Street should be connected to the Community Renewal Area of Aurora Square. As a young person who recently moved to Shoreline, he feels he has a stake in the community. As a conservationist who has done ecological restoration in the City, he feels comfortable and satisfied with the City's efforts on remediation and the environmental integrity of the area. He urged the Commission to keep the momentum going. Growth is happening, change is happening, and people are moving to Shoreline.

**Response:**

Comments are noted. Supports the Connecting Corridor Alternative.

**Wendy DiPeso**

Agreed that changes are occurring and the City needs to be prepared. However, the City cannot be prepared if they do not have all the information when making decisions. The Preferred Alternative will not fit within the current restrictions imposed by existing traffic conditions, existing habitat, or the needs of the current residents. She referred to the map provided by staff to illustrate the critical areas, which is considered each time an application for development is submitted. If that is the case, she questioned why the City would rezone properties within these areas to higher density. She suggested that the Critical Area Layer should be overlaid onto the Preferred Alternative map to determine whether or not the high-density zoning is appropriate in areas that are considered buffer zones for wetlands. She suggested there will be increased problems with flooding and other infrastructure challenges. It will also confuse developers who purchase property based on zoning, but later learn that properties are not developable. She cautioned that the City should not move the subarea plan forward before the 145<sup>th</sup> Street Corridor Study has been completed. She also cautioned that adopting a Planned Action Ordinance would cut the City off from a valuable source of information provided by people who live in the area. She recommended a zoning overlay instead of a Planned Action Ordinance. This would allow citizens to continue to have a voice in designing their own community as it grows and changes. Rather than a top-down approach, she suggested that planning be done together as a community. The community cannot afford the costly lawsuits that result from the top-down approach.

**Response:**

Comments are noted. The FEIS does not identify a Preferred Alternative. The 145<sup>th</sup> Corridor Study is complete and has been incorporated into Chapter 3.3 Multi-Modal Transportation of the FEIS. The City will comply with SEPA, 43.21C RCW, and its implementing regulations if it elects to adopt a planned action ordinance for the subarea. The FEIS will serve as a basis for that ordinance. Impacts of the proposed subarea are addressed in Chapter 3 which has subchapters for all subjects areas. Mitigation measures have been proposed which along with the City's regulations will address probable adverse environmental impacts. See also City's Response to written comments submitted on April 7, 2016 by Ms. DiPeso's attorney, Dykes Ehrlichman.

**Deborah DeMoss**

Said she lives within the 185<sup>th</sup> Street Station Subarea and she supports the concerns raised by residents who live in the 145<sup>th</sup> Street Station Subarea. She urged the Commission to be prudent and wise in their decisions. Do not run with the staff's recommendation just because they say it is good and sound. It is not sound for anyone to rush because of the almighty dollar. She said Seattle is a good example of what can happen when planning is rushed. While she loves the shops and restaurants, she refuses to go there because of the changes that have taken place and the horrific traffic. She does not want Shoreline to be like that. She urged the Commission to base their decisions on what the public is saying. She shared that the street she lives on is a nightmare because decisions were made and changes were allowed to occur without providing sufficient infrastructure improvements. Additional study related to infrastructure, city resources, traffic, etc. needs to be done before the Commission makes a recommendation.

**Response:**

Comments are noted.

**Jeff Eisenbrey**

Expressed his belief that a Planned Action Ordinance is inappropriate for a project of this scale, and it is without precedent in North America. As originally proposed, the Planned Action Ordinance would have made all existing uses in the rezone area non-conforming, and thus illegal and challengeable in court by developers. The staff's early recommendations have given the residents in the area cause to wonder. Staff is deeply invested in a very exciting plan, and they are thrilled to see a dense, urban area built. Informed by development interests, staff has been chipping away at the language that defines the realities on the ground. They have introduced inaccuracies, which endanger wetlands, enjoyment of properties, and the investments that land owners make to their lands and homes. He urged the Commission to take care that the development community is not provided the means to get a legalistic foot in the door, and thus, adversely impact the community.

Mr. Eisenbrey suggested that the course and quality of development must be regulated beyond zoning. Phasing, construction standards, realistic parking impacts, and expansion of community infrastructure (schools, stormwater, sewers and public space) must all be spelled out in detail before the first permit applications are accepted. If this is not done, developers' attorneys will force unintelligent decisions that will impact property owners and the City forever. Planning must be more holistic if the City is to see beautiful, ecologically sound, livable, and lasting work done that does not make victims of current City residents.

**Response:**

Comments are noted. A planned action ordinance does not impact the conforming status of existing uses; only zoning does this. A planned action ordinance streamlines the environmental review process for those projects which meet its parameters. The FEIS considers phased zoning for all action alternatives. Mitigation measures and development regulations specific to the zoning districts proposed for the subarea would apply to development.

**Cathy Aldrich**

Said she has lived in the Paramount Park Neighborhood for over 30 years. She agreed that light rail is coming and the City cannot avoid greater density. However, it should be taken very slowly. She referred to Virginia and the Washington D.C. area where there are great transit options, but traffic is still a nightmare. The same could happen in Shoreline if the City is not careful. She recalled that when she moved into the neighborhood, there were many more businesses on 15<sup>th</sup> Avenue NE. Although there was a population that supposedly could support the businesses, most are gone now. She agreed that additional study is needed. The people who live in the area will suffer the greatest affects. Again, she asked the Commission to slow down the process. She noted that, although the light rail station on Roosevelt in Seattle has not even opened yet, the community has totally changed. Change can happen quickly.

**Response:**

Comments are noted.

**Jan Stewart**

Said she also lives within the 145<sup>th</sup> Street Station Subarea. She referred to a written letter she submitted prior to the meeting. She said she agrees with many of her neighbors who have raised concerns about whether or not the 145<sup>th</sup> Street Corridor Study is sufficiently complete for the subarea plan to move forward. She said she supports additional R-6 zoning around the parks, particularly Paramount Open Space and Twin Ponds Park, which are both sensitive areas.

Ms. Stewart noted that residents living between 15<sup>th</sup> Avenue NE and 8<sup>th</sup> Avenue NE were part of the Southeast Subarea Plan, which was adopted in 2011 and intended to be a 20-year plan. She asked why these properties are now included in a different subarea plan without being noticed of revisions to the previous plan.

**Response:**

Comments are noted. The 145<sup>th</sup> Street Corridor Study has been completed and incorporated into Chapter 3.3 Multi-Modal Transportation of the FEIS. The FEIS contains an analysis of Alternative 4 Compact Community Hybrid that retains low density zoning adjacent to Twin Ponds, Paramount Park, and Paramount Open Space. Based on public comment, the FEIS addresses the overlap of the Southeast Neighborhood Subarea and the change needed in the area based on the light rail station. See Chapter 3.1 Land Use Patterns, Policies, and Plans.

**Comments on the February 19, 2016 Addendum to the DEIS**

To better respond to comments submitted on the DEIS about wetlands, streams, soils, trees, habitat, and surface and groundwater in the subarea, the City decided to undertake additional analysis of the natural systems in two locations that are known to contain large critical

areas: Paramount Open Space and Twin Ponds Park. On February 19, 2016 two technical memos were published: a Wetlands and Streams Assessment and Geotechnical Considerations for High Groundwater or Peat Conditions. Together, these memos were issued as an Addendum to the DEIS. Although not required, a public comment period was offered through March 21, 2016, and several written submittals of comments were received. Responses to these comments are provided below.

### ***Responses to Common Themes in DEIS Addendum Comments***

As with comments on the DEIS, there were several common themes in the comments on the addendum. Responses to these common themes are provided below, followed by comment submissions by individuals and specific responses to each.

### **Scope, Methodology, and Mapping as part of the Wetlands and Streams Assessment**

Regarding comments related to the scope and methodology of the Wetlands and Streams Assessment and related mapping work, the 2015 wetlands and streams reconnaissance completed by Otak, Inc. was an **assessment** that focused on city-owned public properties in the vicinity of Paramount Open Space and Twin Ponds Park and not privately-owned properties. The assessment was preliminary and based on a high-level review of existing mapping and reconnaissance of field conditions that did not involve conducting a detailed wetland and stream delineation.

As the assessment report indicated, wetland and stream delineations will need to be completed, mapped, and surveyed prior to any site redevelopment in the future to accurately confirm wetland, stream, and buffer limits as required by Shoreline's Critical Area Regulations, SMC 20.80, as well as any applicable federal and state regulations related to streams and wetlands. For development in proximity to wetlands and/or streams, the delineation and critical areas report would require specific mapping and surveying of the limits of the wetlands and/or streams (ordinary high water marks), classification of the wetlands and/or streams, and identification of the appropriate buffer widths based on classification). This would be required under any of the alternatives, including Alternative 1—No Action or any of the three action alternatives that may be adopted.

Mapping of wetland and stream elements in the 2015 reconnaissance/assessment was based on a planning-level GIS methodology and not on field delineation and survey. As such, the mapping is approximate and preliminary. Future wetland and stream delineations would need to be completed, mapped, and surveyed prior to any site redevelopment in the future to accurately confirm wetland, stream, and buffer limits. Given that wetlands and streams change over time, the most prudent approach for the DEIS Addendum was to conduct a reconnaissance level assessment, with the understanding that property owners and/or developers would be required to conduct their own detailed wetland and stream delineations as part of the permitting process for future redevelopment plans. (This would be required under any of the alternatives, including Alternative 1—No Action or any of the three action alternatives that may be adopted.)

Since hydrologic systems in the watershed are dynamic and change over time, it is again important to note that mapping depicted in the Addendum to the DEIS, this FEIS, and in other earlier reports can be subject to change and as such should be considered preliminary. Future development projects would be required to delineate, survey, and map critical areas specific to each site and at that time, those maps will present the most up-to-date, accurate conditions of streams, wetlands, and associated buffers.

### **Timing of the Wetlands and Streams Assessment**

Several comments stated concerns about the timing of the reconnaissance and assessment work, which occurred in late summer of 2015, in a particularly dry season. Assessments and delineations of streams and wetlands can be conducted at any time of year, and often are conducted during the growing season when indicator species of plants can be observed. Regardless of the season of the work, accepted methodologies call for observations of sufficient indicators of wetland hydrophytic plant communities, hydrology, and hydric soils. In the case of the Wetlands and Streams Assessment, these indicators were observed, including high groundwater indications, even though the assessment was conducted in a dry summer season.

Scientists are required to look at consistent indicators regardless of the time of year. Although the work was performed during the dry months of the year, it was done with the understanding that formal delineations would be required in the future so as to provide an accurate definition, description, surveyed boundary lines of the critical areas and buffers timed with future development proposals. At the time the work was conducted, sufficient indicators of wetland hydrophytic plant communities, hydrology, and hydric soils were observable for the reconnaissance level of effort to inform the assessment and provide a preliminary indication of potential stream and wetland areas and related buffers and how these might impact future redevelopment potential, which was the focus of the 2015 work.

### **Comments about the 6.9 Acres of Wetland Cited in the Thornton Creek and West Lake Washington Basins Characterization Report**

The 2004 report covered a larger focus area (outside the public property vicinity) than was the focus of the 2015 wetlands and streams reconnaissance/assessment work. The 6.9 acre wetland area appears to originate in wetland evaluations conducted by/for King County circa 1989. This 1989 delineation report was not available for review and comparison during the 2015 wetland reconnaissance work. Watershed hydrologic systems are dynamic, conditions may have changed since 2004. As noted above, the reconnaissance/assessment report was based on a planning-level GIS methodology and not on field delineation and survey, and as such, it should not be compared to previous (and in some cases more detailed) wetland and stream analysis work. Proponents of future redevelopment applications would be required to conduct their own up-to-date analyses of critical areas, formally delineating and surveying boundaries and prescribing classifications and buffer areas accordingly.

### Concerns about Potential Effects to Habitat

Several comments stated concerns about potential effects to wildlife habitat that might occur with redevelopment under the action alternatives. Potential redevelopment in the station subarea would be required to comply with all applicable local, state, and federal regulations and would undergo detailed analysis and design for specific site conditions. Regardless of the zoning designation, critical areas and associated buffers are protected by City of Shoreline Municipal Code (SMC) critical area requirements which establish buffers and place restrictions on the removal of trees and vegetation in critical areas regardless of the zoning designation in place. Washington State and federal requirements also apply to these natural areas. With future aggregation of properties, even if critical areas and buffers are included within master site plans for development, the streams, wetlands, and buffer requirements would still be applied.

With any future redevelopment, developers would be required to conduct detailed, site-specific analyses of critical areas and geotechnical conditions. Wetland and stream delineations meeting City of Shoreline, Washington State Department of Ecology, and federal regulations and protocols would be required for all properties undergoing development with wetlands and streams located within the property boundaries or in proximity to the property. The locations of these features would affect the footprint of redevelopment.

There is no known research that indicates that mixed use residential or multi-family uses would result in a greater level of impact to nearby streams and wetlands than existing single family uses. To the contrary, redevelopment can improve the quality of natural areas that are delineated and protected through that process. Stream corridor restoration and wetland enhancements often are implemented as part of these projects. Redevelopment projects are required to comply with stringent local, state, and federal critical areas requirements, as well as stormwater management provisions that control flows and clean water runoff, which improves conditions in surrounding streams and wetlands.

Without redevelopment in the subarea in the vicinity of streams, wetlands, and buffers, large portions of these critical areas would continue to exist within private property areas (single family lots primarily), rather than be delineated, surveyed, and protected in the redevelopment process. Residential and backyard structures, fertilized lawns and gardens, and other non-natural elements currently located in buffers would remain. With future redevelopment under any of the action alternatives, critical areas boundaries could be more effectively protected. **Figure 3.4-6** provided at the end of Section 3.4 of this FEIS illustrates influences on riparian areas in the Thornton Creek Basin (from the Thornton Creek Basin Characterization Report, 2004) and shows the existing extent of homes and lawns along streams in the subarea.

### **Alternative 4—Compact Community Hybrid, a Zoning Alternative that Reduces the Amount of Upzoning around Park Area**

Public comments were submitted that included concerns about upzoning around park and open space areas in the subarea and that this should be further studied in the FEIS. Based on public comment, areas surrounding Paramount Park, Paramount Open Space, and Twin Ponds Park retain single-family (R-6) zoning through the development of a new alternative – Alternative 4 Compact Community Hybrid – that is discussed in the FEIS.

### ***Responses to Written Comments Submitted on the DEIS Addendum by Individuals and Groups***

Following are responses to comments submitted during the comment period on the DEIS Addendum by individuals and groups.

**From: Megan Kogut**

**Received: February 17, 2016**

Dear Planning Commission,

I live at 15806 10<sup>th</sup> Ave NE, about ½ north of the Paramount Open Space. I walk my dogs in the Open Space regularly, and I use the rather grim tractor/tree combination at the south end of the park as a local tourist destination for house guests. I also occasionally jog in Twin Ponds Park.

I write in support of the conclusions of the Otak memo of January 29, 2016 and the accompanying Wetlands and Stream Assessment. I would be at the Planning Commission meeting on Thursday, February 18, if I didn't have a prior commitment out of town that night.

I happen to have a PhD in environmental engineering from the Massachusetts Institute of Technology Department of Civil and Environmental Engineering, where I received a well-rounded education in environmental science, including chemistry, limnology and wetland science, microbiology and hydrology. I also took several environmental law and policy courses at the MIT Sloan School of Management and a course in landscape design. As faculty at UW Tacoma, I've created and taught six separate courses related to environmental science, policy, and natural history in the Pacific Northwest.

I roll out my credentials here because I feel that I am well-qualified to say that you don't need much of a science background to appreciate the implications of the Otak report. It is clear that redeveloping the areas around Paramount Open Space, and around Twin Ponds Park, open the door to possibilities for meaningful and significant environmental benefits for those parks and the people who visit them.

As a natural historian, I understand well why single family houses were built on wetlands and riparian areas all over Shoreline and beyond the Growth Management Act was enacted. And I appreciate efforts of those adjacent to the wetlands and creeks to protect those natural assets as if they were their own.

But, the next person who purchases one of those non-conforming properties might not be so like-minded. I feel that going forward, knowing more, we can improve on the past by eventually removing non-conforming structures and landscaping, implementing buffer zones, managing stormwater quality and quantity, taking full advantage of required mitigation for new construction, and creating opportunities for high quality restoration as well as passive recreation.

The Class III and IV wetlands, surrounded by weedy hills and the backyards of houses, have so much potential for aesthetic and functional improvement and better accessibility. They are wetlands that survived by virtue of being difficult to "reclaim". And I appreciate ongoing volunteer efforts to add paths and remove invasive species. But the Paramount Open Space currently does not fully reflect today's values for wetland function and passive recreation.

But, it could be a true crown jewel of Shoreline if restored and enhanced. The same possibilities exist for Twin Ponds Park, and creeks around both areas being considered for rezoning.

It may feel to some that tall residential buildings are inappropriate next to wetlands for aesthetic and personal reasons. There is some merit to that argument, but this is not the question at hand.

The question at hand is of course whether mixed use development, conforming to all existing laws and permit conditions, could have a lower impact on the wetlands and riparian areas than the existing use. The answer is clearly yes, in many ways, based on the results of the Otak report as well as common sense.

However, I will still address the question of whether it is inappropriate to put tall buildings next to wetlands for personal or aesthetic objections. I have a personal story of my own that I hope is considered alongside other people's personal stories.

As you know, the Growth Management Act of 1990 has a clear purpose: to encourage growth within urban areas first. This rezoning, building up not out, is a clear example of fulfilling that purpose. That this rezone is next to some Class III and IV wetlands is a lucky chance to enhance them. But, ultimately, the purpose of this rezone is to protect more wetlands in rural areas.

My parents moved to a five acre property just outside of Gold Bar, WA, in 1993. A salmon-bearing stream goes through their property, which is about  $\frac{3}{4}$  wetland. The wetland on their property is connected with extensive wetlands in the 100+ acre undeveloped property across the street, owned at one point rather ironically by a subsidiary of Eddie Bauer Inc. Those wetlands are all at least Category 2 if not Category 1 due to their large size and mature trees, since they have been undisturbed since a single logging probably a century ago. They also play a significant role in maintaining water quality and quantity in a salmon-bearing stream. Since about 2003 if not earlier, there has been constant pressure to clear, grade and build on the large property across the street. In fact the lot was partially logged about ten years ago in preparation for subdivision. Because this area is not served by a sewer district, the housing density would probably be around one house per acre due to septic field requirements. That sort of development, in that location, is a huge environmental impact on a higher quality wetland. And it is a huge environmental impact per person compared to a multistory apartment building. And then there are the environmental impacts of heating those large single family houses, commuting a long distance to and from those houses, and so on. Keeping this rural property, and many more like it, undeveloped is the primary motivation for the Growth Management Act. I estimate for the purpose of illustration that the 100 acre property could support 100 households or maybe 400 people. I imagine also that a multistory apartment building could support 400 people, walking distance from local amenities, a light rail station and extensive bus service.

It is time to set the stage to create communities with a far smaller footprint on the environment. And with mitigation and restoration, we can increase the size and quality of our local wetland remnants. We can grow them into relatively high functioning and accessible urban jewels. They would have more benefit to the environment and they would act as living classrooms and restful, safe urban retreats for hundreds, if not thousands of people. I'd even go so far to imagine that someday in the far future, the Paramount Open Space could become a protected but accessible centerpiece of new development, rather than a hidden and at times potentially unsafe open area accessed at the ends of a few dead-end residential streets and trails. The laws and policies related to future development are in place to ensure that happens going forward, especially with robust public support.

I look forward to the future of these urban wetlands. I realize there is no action on this report at this time, but I write in strong support of the Planning Commission eventually accepting the conclusions of the report and recommending that the rezoning will have a net positive effect on both parks overall. I look forward to commenting further and being able to attend meetings regarding this issue in person.

Thank you for your time.

Megan Kogut PhD

**Response:**

Comments are noted. The City has studied Alternative 4—Compact Community Hybrid in this FEIS. Alternative 4 proposes to retain existing single family zoning around the parks and open space areas in the subarea. If Alternative 4—Compact Community Hybrid is adopted, there would not be redevelopment on properties surrounding the wetlands and streams in the parks and open space areas, and as such, the opportunities mentioned to further delineate, protect, and improve these areas may not occur.

**From: Sarah Cooke, PhD****Received: March 10, 2016**

I have been asked to review the Wetland and Stream mapping and characterization performed by the City of Shoreline at Paramount Open Space.

As part of my review, I have examined the materials listed below as well as performed a site visit to examine various locations. The results of both are given below.

**Documents Reviewed**

- City of Shoreline. February 2016. 145<sup>th</sup> Street Subarea Planned Action, Addendum to the Draft Environmental Impact Statement.
- City of Shoreline. February 18, 2016. Additional Technical Assessments for the 145th Street Station Subarea Plan 6a. Wetlands Update LRSAP Staff Report. Including Memorandums from Otak on Wetlands and GeoEngineers on Geotechnical Assessment.
- Otak. Jan 2015. 145th Street Station Subarea Planned Action. Draft Environmental Impact Statement. Prepared for the City of Shoreline.
- R.W. Beck, Inc. July 2005. City of Shoreline Surface Water Master Plan. Prepared for the City of Shoreline, Wa.
- Seattle Public Utilities. 2000. Thornton Creek Watershed Characterization Report.
- Tetra Tech/KCM, Inc. May 2004. Thornton Creek Basin Characterization Report. Prepared for the City of Shoreline, Wa.
- Tetra Tech/KCM, Inc. May 2004. City of Shoreline Stream and Wetland Inventory and Assessment Appendices.

**COMMENTS AND REVIEW OF THE REPORTS AND SITE VISIT**

My comments below will be focused on the accuracy and deficiencies of the various reports listed above as they related to Paramount Open Space and the existing wetlands, streams, and overall critical areas found in the Park, including the downstream receiving waters of

Thornton Creek. I also anticipate commenting on the Twin Ponds critical areas survey and how the rezone will affect this critical area, but the City's wetlands assessment is not yet ready so my comments on this will be reserved for a later date.

My main emphasis was to determine both in these reports and in the field:

1. The accuracy of the Wetland Mapping and Rating by Otak in 2015.
2. The accuracy of the Stream Mapping within and adjacent to Paramount Open Space by Otak in 2015
3. The need to protect the streams and wetlands in Paramount Open Space based on recommendations from the City's Surface Water Master Plan (R.W. Beck 2005) and the 145th Street Station Subarea Planned Action (Otak 2105)
4. Soils and Geologic Mapping accuracy within and adjacent to Paramount Open Space and the implications of the soils and geology deposits on their potential to affect the wetlands and streams of Paramount Open Space and Thornton Creek as a result of the proposed high density residential development.

It should be noted that the Growth Management Act (GMA) requires that counties and cities utilize Best Available Science (BAS) in developing policies and regulations to protect the functions and values of critical areas. All ensuing studies and policies must take BAS into consideration before any activities are undertaken in critical areas that might affect their integrity, functions, and values. It is in light of this that I performed the review given below.

**1. The accuracy of the wetland mapping and rating by Otak in 2015 (and how it compares to previous wetland inventories documented in the City's own database).**

In their wetland inventory included in the Thornton Creek Basin Report (May 2004), Tetra Tech identified the drainage and sub-drainage basins in the Thornton Creek Watershed, including Paramount Open Space (Figures 1 and 3). This includes wetlands and streams as mapped in Figure 5.

In the 2000 and 2004 Thornton Creek reports by the City of Seattle and Tetra Tech for the City of Shoreline including a wetlands inventory (Appendix B, May 2004), and the City's own GIS database (Shoreline online GIS Mapper) all quote the wetland acreage to be approximately 6.9 acres of forested, shrub, and emergent wetlands in two large wetlands (Appendix B, 2004 Thornton Creek Characterization Report, Table 1). The reconnaissance performed by Otak (City staff report and Otak Memorandum (January 2016) found seven smaller discrete wetlands for a total of only 1.97 acres (Figure 6- yellow and red polygons, Figure 7 detailed map of the reconnaissance). They show no wetlands in the southern part of the Park in the restored area, while we found many stream-associated wetlands in this part of the park, (Figure 6 arrows showing where additional wetland was found; Figure 8 photo map and Photos 21-25). We also found more wetland in the northeast corner of the Park and associated residences that are not shown on the Otak map (Figure 6 arrows showing where additional

wetland was found; Figure 8 photo map and Photos 1-10). And more wetland in the central part of the park between Wetland F and Wetland C such that these two wetlands are actually one wetland system (Photos P1, P2, P18, and P19). Additionally, many of the residences on the east side of the Park along 12th Avenue NE had wetland continuing into their western back yards abutting the Park (Figure 6 arrows showing where additional wetland was found; Figure 8 photo map and Photos 12-20). Much of this area was also not included as wetlands mapped by Otak. Approximate GPS locations of wetlands found during our February reconnaissance are shown on Figure 8 where the photo pins are located and on Figure 6 where the arrow points indicate locations where both photos and GPS points were taken in areas that were wetlands. The arrows shown on Map 6 do not show a formal delineation map. It is indicating areas that met wetland criteria and which were not identified on the Otak map as being wetland. A word about the photos included: The photos show characteristics about the ground conditions - either the vegetation prevalent (which is usually wetland species for the wetland shots) or the soils conditions (again showing wetland soils), or standing water indicating the area has wetland hydrology. When the shots are of upland they indicate this.

The Otak reconnaissance wetland map is also displayed as a layer on the City's Wetland map as a layer that is shown as either a blue or yellow polygon/series of polygons on Figure 6. as the with Wetland 111 having a much reduced footprint of wetland WL-1 and the red pattern with a much reduced footprint over the previous delineation also shown as the blue shaded pattern on Figure 6.

The wetland ratings listed in the Otak reconnaissance from August and September 2015 were all listed as Category III and IV wetlands (see table at top of Figure 7), while the City's wetland inventory reports 4 Category (type) II wetlands and 5 category (type) III wetlands within the Park and three Category (type) II wetlands and 1 Category (type) III wetland just adjacent to the Park. While I did not rate the wetlands during my site evaluation it should be noted that I sat on the team that developed the 1992 wetland rating and I was a technical reviewer and taught the method for the Department of Ecology for the subsequent version (2004 updated in 2008) used for this analysis and I find it unlikely that some of the forested wetlands I saw out in the Park would be less than a Category II wetland rating. The rating should be revisited when a formal delineation is performed because the buffer widths proposed could possibly change as a result of the ratings changing from a Category III to a Category II wetland. This would obviously affect the development footprint on the lots just adjacent to, or including the wetlands that would be a Category II type. The buffer widths assigned to the Wetlands identified varied from 105 to 165 feet for the forested systems. According to that designated by Otak. Since Category II wetlands under Shoreline Municipal Code (20.80.330 9City of Shoreline, 2016) are assigned the same buffer widths as those assigned for Category III wetlands the width would not have changed unless the scoring for habitat on the data sheets changes. However, changes to the wetland boundary could significantly change the amount of developable land that would be available on the lots along 12th Avenue NE.

The two ponds and associated Wetland WL-F on Figure 5 were enhanced and/or constructed by local volunteers under a Water Quality Block Grant awarded by King county Department of Natural Resources prior to the 2004 basin characterization report. These areas are now

well established and the plantings installed back in the early 2000's are now well established. Photos on photo sheet 6 of the attached photos show some examples of this area.

### 3. The accuracy of the Stream Mapping within and adjacent to Paramount Open Space by Otak in 2015

In the 2000 and 2004 Thornton Creek reports by the City of Seattle and Tetra Tech for the City of Shoreline including stream inventory (Appendix A May 2004), and the City's own GIS database (Shoreline online GIS Mapper) all show the streams to be mapped as shown on Figures 5 and on Figure 6, (the overall outline including both the blue and black segments). Figure 6 also shows the seam/creek reconnaissance identified by Otak in their December 2015 reconnaissance as the blue segments with the detailed stream reconnaissance shown on Figure 7.

The drainages (streams and creeks) mapped in the Park by Otak (Figures 6 and 7) include some omissions that have been added back as the black lines on the City's GIS database (Figure 6). We observed these creeks/drainages are still present when we performed our reconnaissance on January 29th, 2016 (Photos PB, P9, P11, P17, P20, P23, P24, P21, and P25). Little Creek is the main tributary to Thornton Creek through the park but there are many other tributaries, wetlands, ponds and connecting channels that are also present (See Figures 5 and 6). Some of the channels are now piped, especially the main channel that passes through a culvert under the gravel road that bisects the Park from north to south (photo P17).

Little Creek (Subbasin TC-C - Figure 3) flows through Paramount Open Space through segment TC14 mapped on Figure 5 as a tributary to Thornton Creek. The aerial photograph evidence documented in the City's Thornton Creek Characterization Report states that it flowed to Jackson Park in an open stream prior to the 1940's (Tetra Tech 2004). Much of this Creek has been piped from residences west of NE 174th Street and 14th Ave NE with another tributary that is now also flowing from a culvert. Beginning at 12th Ave NE, the creek (Figures 5 and 6) come out of a pipe and flow west to the Park and then jog south where the tributary splits into two. The western arm, which is the main channel of Little Creek, flows through Wetland WL-1 (2004 inventory, Figure 5) and a drainage tract with landscaping; and the eastern arm flows through on the edge of Wetland WL-L and through Wetland WL-F (also Figure 5 where it enters the pond and wetland enhancement area identified above supplying the wetlands, seeps back into the second pond via small channels described above and then flows west into the main channel of Little Creek. The stream through the Park is generally still in good condition with sufficient bank vegetation and sparse armoring and fair pool frequency. Gravel and quarry spall is present in the south end of the reach but overall this segment is the ONLY one of the three segments of Thornton Creek within the City of Shoreline that was given a "fair" rating when assessed (Tetra Tech 2005). It is imperative that the City do all it can to maintain the integrity of these tributaries should the new zoning become reality. Increasing residence density on the east side of the Park would be in the direct path of many of these channels and no additional piping should be

allowed. It should be noted that the DEIS states that Littles Creek lies mile from the Proposed Light Rail Station, but actually it is only % of a mile.

**4. The need to protect the streams and wetlands in Paramount Open Space based on recommendations from the City's Surface Water Master Plan (R.W. Beck 2005) and the 145th Street Station Subarea Planned Action (Otak 2105).**

In 2004 the drainage study evaluated the total impervious areas in subdrainage TC-C to be 45 percent (Tetra-Tech, Thornton Creek Characterization Report, Figure 3). The future build-out of the subdrainage projected an increase to 50 percent impervious if the zoning stayed the same at R-6. Changes from a R-6 zoning to the proposed MUR-30 and MUR40 and MUR 70 proposed adjacent to the Park will increase the amount of impervious surface up to 90 percent with the equivalent of 48 units/acre and 75 percent with 18 units per acre (Tetra Tech 2005 Table 2-3). This increased impervious surface would be associated with increase surface flow in streams post-storm event. The Tetra Tech report also states that it could "result in flooding and destroy aquatic and riparian habitat by eroding banks, and removing the riparian (stream-adjacent) vegetation".

The DEIS states the stormwater runoff (analysis) is only very preliminary: "The analysis of change in peak discharge was for DEIS planning purposes only and does not reflect actual expected post-redevelopment conditions". How does the City expect to vote on this rezone with no real idea of what may occur as a result of the proposed changes?

**5. Soils and Geologic Mapping accuracy within and adjacent to Paramount Open Space and the implications of the soils and geology deposits on their potential to affect the wetlands and streams of Paramount Open Space and Thornton Creek as a result of the proposed high density residential development.**

Paramount Open Space and the area directly to the south have been mapped as being underlain by Esperence Sands and Younger Alluvium (Tetra Tech 2004). It is the only area in the entire Shoreline part of the basin with Younger Alluvium. It seems likely that the young alluvium mapped is recent sediment deposited as the basin became developed. This means that this area is unstable and prone to erosion when the soils are disturbed. There is certainly the expectation that new development would add additional sediment to this area, which could pose a problem to the streams and creeks in the area and also for the water quality of Thornton Creek in the downstream receiving waters.

There is no way to verify this independently through NRCS soils maps since there is no soils mapping available through the regular sources for the City. Extensive research online (NRSC soils mapper), in the City's database (GIS Mapper), and in the King County hard copy soils mapping (Snyder, Gale, and Pringle. 1973, Soil Survey of the King County Area) have yielded no soils data for the City, including the Park and adjacent properties. This is all the more reason why the City should have done some preliminary soils evaluations for this area.

The City's analysis of the soils and the peat deposits in and nearby to the Park identified "that high groundwater or peat conditions exist in some of the areas near Paramount Open Space and Twin Ponds Park". Unfortunately the City's consultant only viewed the study from the perspective of how difficult it will be to build over the peat soils (Otak, January 2016).

"Redevelopment of properties with peat-laden soils, high groundwater, and soils subject to liquefaction and the required engineering treatments and mitigations to address these conditions typically would be more expensive than redevelopment of properties without these conditions."

The study done by Otak did not include an analysis of what the impact would be to groundwater and groundwater recharge if the peat soils were removed or compacted. This is a huge error on the City's part because construction that disrupted these soil deposits could cause dewatering of the wetlands and/or streams in the Park. There is NO discussion of this aspect of the problem anywhere in the DEIS or Staff reports. The geotechnical report only includes borings outside of the areas that would be of interest from a wetland and stream dewatering perspective.

#### **Discussion.**

If the City is waiting for redevelopment projects to perform site-specific geotechnical and wetlands studies, how do they propose they can make decisions on whether or not the rezone is even feasible or desirable now?

The City has failed to accurately map the wetlands within - and adjacent to, the Park so that potential impacts to critical areas (wetlands, streams, liquefaction zones) as a result of converting the single family residences to high density multi-family units, is great. I can guarantee, based on my site visit, that there are more wetlands along the eastern and southwestern sides of the Park that were NOT included in the Otak reconnaissance. At the very least the older on-record 6.9 - acre delineation should be used by the City when evaluating the rezone. It would be more accurate for a new delineation to be done, (and not in August at the driest time of year) at least along the eastern edge of the Park. At the very least, this should include the lots along the western edge of 1st Ave NE, including Lots (Figure 6): 15104 south to 1113 and lots 1117, 1123, 112014849, 1123, 14829, 14823, 14815, 14811, 14729, 14721, 14719, 14721, 14534, and 14528, (Figure 6). It would also be important to assess the channel that is aligned with the back of Lots 14652, 14646, 14640, 14634, 14612, 14604, 1460?, 93?, and 927.

Failure to map the Soils and Geology in the Paramount Open Space area and also to include an analysis on these features in the potential impacts that could occur as a result of the rezone, is a huge problem with the City's ability to develop an informed decision about the potential impacts that may occur as a result of the rezone. The City cannot wait till a "future time" to do these studies. As discussed above,

there are known peat deposits and high groundwater conditions in and around Paramount Open Space though the extent and exact location are not known. It is a well accepted fact that soil compaction in peat soils and paving (impervious surface) reduces infiltration and storage capacity of soils, which in turn lessens groundwater recharge and base flow in streams. It would be very detrimental to the wetlands within and adjacent to the Park as well as the water quality and the hydrologic regime of Thornton Creek through the Park and downstream. This is coupled by the fact that nowhere in any of the preliminary analyses did the City or their consultant look at the problem of peat soils and high groundwater with respect to dewatering the wetlands and streams. They only looked at the cost of constructing developments under these conditions. This is a huge error, and one that will result in unavoidable adverse impacts to critical areas within and adjacent to the Park.

There are numerous small tributaries throughout Paramount Open Space that are fed by this groundwater base flow. Any reduction in the buffer width allowed adjacent to the streams, or piping of the streams/drainages as a result of allowing higher density development; will in-turn reduce the base flow feeding these tributaries and subsequently Thornton Creek.

Additionally, increased surface flow in streams as a result of increased impervious surface and less infiltration post-storm event can cause flooding and destroy aquatic and riparian habitat by eroding banks, incising the stream within the banks, and removing the riparian (stream-adjacent) vegetation. It can also cause a situation where rainfall exceeds infiltration and more water is carried in the streams and creeks than they can accommodate increasing the bank erosion/failure and creek channel incision. Development that occurs in conjunction with increased impervious surface and decreased buffer widths are KNOWN to cause increases in peak flows and runoff volumes downstream. It is clear that the City has NOT evaluated the repercussions of the changes that will occur if the neighborhood surrounding Paramount Open Space goes from single family residences to more multi-family residences with reduced buffers adjacent to the creeks and the wetlands. It is precisely at the time when you increase the number of units and people that you need to INCREASE the buffer widths to afford sufficient protection of the wetlands and Creeks and downstream receiving water quality for salmonids and other resident fish. Yet, the City is proposing to decrease the buffer widths? This makes no ecological sense and greatly increases the chances of catastrophic stream degradation; resulting in removal of riparian vegetation, channel incision causing dewatering of stream-adjacent wetlands, and flooding of adjacent properties that are already saturated and flood-prone during the winter. The City's Failure to correctly delineate the wetlands, creeks, and soils and model the effects of the increased impervious area will only exacerbate these issues.

Add to these projections the apparent change in climate and possible increase in rainfall (from Cliff Mass's blog from 3/1/16):

"At 1 PM today [March 1st], Seattle weather history was made. Seattle has received enough precipitation since October 1 to make it the wettest winter in Seattle history. The water year starts on October 1 and this makes a lot of sense here in the Northwest, since our

summers are very dry and the real rain usually does not begin until mid to late October. October 1-March 1 encompasses our meteorological winter and is not an arbitrary period. "

And the problem of increased stream volume, flooding, bank erosion and failure and washing away of the riparian vegetation increases in severity. It is imperative that any projections of the effects of increased impervious surface in the sub-basin used for evaluating the potential impacts of changing the zoning, have to include climate change in the model.

There is little mention of Low Impact Design (LID) proposals included in the DEIS analysis which could help mitigate some of the increased density and impervious surface experienced in a higher density land use as proposed. These alternatives would be more expensive and unless required by the City would likely not be used by potential developers.

The Paramount Open Space Open Space and the adjacent neighborhood to the east is the largest remaining wetland area in Shoreline and the Thornton Creek Watershed (Tetra Tech 2004 and City of Seattle 2000). The overall wetland area has been mapped previously at approximately 6.9 acres. Little Creek and the many tributaries in the Park constitute a relatively healthy riparian corridor. The Park has undergone many assaults over the years and there are certainly many areas that are invaded by weedy species, but with the restoration activity that has occurred in the southern half of the park, the Park is still a beautiful and healthy natural area. Historic habitat loss in the buffer areas surrounding the wetlands and streams in the Park is also problematic. There is upland area in the northwest corner of the park but upland habitat is at a premium in the Park. The buffer of the wetlands east of the Park is currently a large percentage of the available upland habitat in the area. Reducing the buffer widths in this area and allowing for high density construction along his edge of the large wetland system would be very detrimental to the backyard habitats and tree canopy that are now providing relatively high quality habitat for local bird and insect life.

And finally, "Since the Thornton Creek Basin within the City of Shoreline is the headwaters of the entire Thornton Creek Basin, the high percentage of impervious surface will affect the entire downstream watershed (Tetra Tech 2004)".

One of the options mentioned in the Agenda 6a LRSAP staff report is to "amend one of the potential zoning scenarios to exclude land near Paramount Open Space Open Space or Twin Ponds park from rezoning." This appears to be a much smarter alternative than opening the City to a series of expenses for studies and mitigation for preserving the integrity of the creeks and wetlands from the highly probably impacts of high density development and reduced buffers.

Please feel free to contact me if you have any questions regarding this review.

Sarah Spear Cooke  
Professional Wetland Scientist and Fellow, Society of Wetland Scientists

**Response:**

Comments are noted. A number of issues raised are discussed in more detail in the “Common themes of DEIS Addendum comments” earlier in this section of the FEIS. Specifically, concerns regarding the accuracy of the 2015 Wetlands and Streams Assessment and related mapping, the size of the Paramount Open Space wetland, and potential effects to habitat are addressed in the common themes responses. Additional information has been added to the FEIS regarding existing soils, as well as subsurface and groundwater conditions. References to Washington State Department of Ecology stormwater management regulations and City of Shoreline critical areas regulations also have been re-emphasized and expanded in the FEIS. Under these regulations, redevelopment projects must control hydrologic flows, protect water quality, and preserve habitat.

Regarding your comment that the analysis of change in peak discharge was for DEIS planning purposes only and did not reflect actual expected post-redevelopment conditions, this has been addressed in the FEIS to clarify that the stormwater analysis calculates potential *unmitigated* surface water runoff (peak discharge) for the redevelopment alternatives, which is a conservative approach because redevelopment would be required to mitigate and control flows. As such “actual expected post-redevelopment conditions” would be expected to be mitigation of excess runoff through surface water management, green stormwater infrastructure, and low impact development techniques implemented with each project.

**From: Cathy Aldrich****Received: March 16, 2016**

Dear Council,

This is regarding the September 17 meeting of the Planning Commission, I have a prior commitment so cannot make my voice heard at the meeting. I live just above the Paramount Park wetland in the area being considered for rezoning. I also read through the complete EIS that the City commissioned, which seems to imply that any development will not have an impact upon the wetland area. This premise should be called into question since the maps of the proposed rezone area actually show housing being built in areas that the EIS deems to be buffer zones.

If the housing that is currently on site is deemed to be encroaching upon the margins of the wetland area, how in the world would rezoning for mixed use, and allowing building on these same lots *not* encroach? Not only that, the likelihood of a large influx of new residents caring as much for the park area as the current residents do would also be questionable. Those of us who live in this neighborhood know we have a gem and we take good care of this important resource.

The residents, quite the contrary to the EIS, know this to be an important, if small, ecologically viable drainage system that attracts a large variety of birds and wildlife. In my own yard I have identified close to 50 different species of birds, attracted by the Paramount Park wetland area.

The needs of developers should not take precedent over saving the few, small pockets of wetlands that remain in our area. If anything, the City should look to expand those wetlands for the sake of any future residents, not build the areas up just because of what *might* happen years in the future, even with the inevitable arrival of light rail.

Thank you for your time.

Cathy Aldrich  
Shoreline WA

***Response:***

Comments are noted. Refer to the responses to “Common themes of DEIS Addendum comments” earlier in this section of the FEIS. The FEIS contains additional detail regarding Washington State Department of Ecology surface water management regulations and City of Shoreline critical areas regulations. Under these regulations, redevelopment projects must control hydrologic flows, protect water quality, and preserve habitat. The FEIS analyzes a new alternative, Alternative 4—Compact Community Hybrid, which retains areas surrounding Paramount Park, Paramount Open Space, and Twin Ponds Park in single-family (R-6) zoning.

**From: Shoreline Preservation Society**

**Received: March 17, 2016**

I represent the Shoreline Preservation Society, a local non-profit working to preserve our environmental and historical resources throughout Shoreline, and we request Legal Standing and Party of Record Status on this matter. We ask that all materials, reports and comment made in this matter be incorporated by reference into the record.

We believe there is a likelihood of severe and significant impact to the environment as a result of the inadequacies of this DEIS Addendum, which cannot be mitigated unless it is corrected.

This Addendum to the DEIS is an important matter, and we are glad extra attention is being paid to the two major wetlands within the 145th Station Subarea. However, we have serious concerns about this report, especially the lack of adequate detail and inaccuracies presented as facts.

Paramount Park Open Space is an extraordinarily special place, which deserves extraordinary attention and protection. Neighbors here, groups I have been involved with have sought to highlight the assets here and to preserve and restore the environmental values it offers. Since 1989, we have expanded the park, fought to protect adjacent resources, and worked on many grant projects. In 1998, a group I was connected with carried out a major wetland enhancement project there, which removed fill dirt and recreated two ponds, which serve as water quality and wildlife habitat features. This and a subsequent project a few years later, were funded by grants from King County and the City of Shoreline. We worked with hundreds of volunteers, planted hundreds of native plants, created trails we installed educational signage and brought many groups to visit.

Wildlife habitat and native plants here are extraordinary and must be protected and enhanced.

At that time, the Army Corps had given the area an overall 6.9 acre designation as a wetland. Because the lands have been altered so many times, it is nearly impossible to ascertain what part of the original wetland remains. The fact is that there is clearly a very high water table and wetlands that emerge throughout the park. There are many channels of creek, and steep slopes surrounding the park. Some are in the Park and some are in the surrounding edges and buffers. Not all of the areas that are sensitive are adequately protected either by City ownership or by codes.

Now the Addendum to the DEIS, has put forward maps and reports that do not really clarify anything. Instead the report has minimized the size of the wetland. Those of us who have explored the park thoroughly know there are many, many places that are wetland or buffer or steep slopes, which are not clarified on these maps and in the report.

The aim of this report seems to have been to find every possible way to allow increased density next to the park and reducing the buffers rather than fulfilling the duty of the City, which should be to protect and defend these important wetlands. The report actually has major errors, such as creek channels in the wrong place, or missing entirely. Important wetland sections are also entirely missed. It makes little if any mention of the steep slopes surrounding it or the extraordinary nature of this wetland. Rather it makes it out to be a degraded place of little value and the creeks and wetlands are downgraded.

When asked for background data that was used to create the report, we were told there was none and that this was merely a "reconnaissance report" and therefore didn't need any scientific data to back it up! That has to be very the flimsiest possible basis Addendum to an EIS, done in the name of the taxpayers of Shoreline.

We have hired noted Wetland Biologist, Sarah Cook of Cooke Scientific to review the report. She has found many deficiencies in it. We ask the Commission to study her report and read it carefully and consider the implications of using an inaccurate and incomplete study as a basis for the Addendum to the DEIS. All of the work that goes forward from this report and decisions that will be made about the future of this entire area, the impacts to the ecosystem and watershed you are charged with protecting, depend upon accurate information based upon professional standards.

We suggest that the Commission direct staff to go back and do a more thorough study that truly takes into account the impacts to the neighborhood, the watershed and the community's future. Paramount Park Open Space is too important as future Park space but also as a vital wetland and repository for drainage. These wetlands do crucial work retaining floodwaters, and ground water to feed the stream in dry times. It will take the brunt of any major density increase unless extreme care is taken to protect it for future generations. There is just too much at stake for this ecosystem and community to give it short shrift.

We believe that options for protecting, mitigating and improving the park and wetland should be included such as LID techniques, replacing illegal culverts, uncovering other filled wetland areas, improved trails and native plant replacement projects should be a part of this report, not just suggestions on how to build next to wetlands or in liquefaction zones.

We ask that you do everything in your power to protect this open space and these critical areas.

Thank you for your attention to this important matter.

Janet Way  
Shoreline Preservation Society

**Response:**

Comments are noted. Please refer to the responses above to "Common themes of DEIS Addendum comments" earlier in this section of the FEIS. Specifically, regarding the accuracy of the 2015 Wetlands and Streams Assessment and related mapping, the size of the Paramount Open Space wetland, and potential effects to habitat are addressed in the common themes responses.

References to Washington State Department of Ecology stormwater management regulations and City of Shoreline critical areas regulations have been re-emphasized and expanded in the FEIS. Under these regulations, redevelopment projects must control hydrologic flows, protect water quality, and preserve habitat. All public park and open space areas would be retained and protected with implementation of any of the action alternatives. The FEIS analyzes a new alternative, Alternative 4—Compact Community Hybrid, which retains areas surrounding Paramount Park, Paramount Open Space, and Twin Ponds Park in single-family (R-6) zoning.

**From: Cory Secrist, PhD and Heather Secrist, PhD**

**Received: March 21, 2016**

In regards to the Addendum to the 145th Street DEIS, we would like to strongly encourage the city to protect the Paramount and Twin Ponds Parks. It is our impression that the recent approach to development around these areas is trying to assess how much the wetland boundaries can be encroached upon by development before damage is done to the wetlands. We would like to encourage the planning commission and the city council to consider taking this a step further in protection of these wetlands by asking not only "how can we prevent damage," but to also ask "how can we ensure that these wetlands thrive for years to come?"

These parks are important for both commercial and environmental reasons. The parks are beautiful. They were part of the reason that my wife and I bought a home in Shoreline in the adjoining Ridgecrest neighborhood. Though our own concerns are not for increasing density, we know that many of the council members want to increase Shoreline's density, and with that motivation these parks should be considered as an important part of the draw to this neighborhood for potential new residents. At the same time, these parks are also important wetland areas, which is something we do personally care about. They help mitigate storm water and aid in providing clean water and clean air. Paramount Park includes Little's Creek, which is a tributary of Thornton Creek. There is also a creek that runs from the north side of Twin Ponds park, and historically one wetland area of the ponds was dried up and killed off when the Aegis Retirement Homes were developed across the street without proper environmental protections put into place. We do not want this to happen again to either the Twin Ponds or the Paramount wetland areas.

As such, we are suggesting that the current R-6 zoning surrounding these areas remain in place to avoid further tampering with these sensitive wetland areas. New development means more concrete and less pervious soil for the flow of storm water. This can lead to dried up wetlands and flooding.

Please consider the multiple sources of information available to you beyond the recent Otak report. The Shoreline Preservation Society recently ran an independent survey of Paramount Park, and the city has done more rigorous analyses of these areas in the past that should also all be given consideration, particularly since the science appears to be stronger in some of these latter mentioned sources of wetland evaluation.

Please preserve and even work to enhance and expand our parks and wetland areas. They are important to our neighborhood's health, recreation, attractiveness, and livability. Thank you for your consideration.

Cory Secrist, PhD

Heather Elise Murphy Secrist, PhD

**Response:**

Comments are noted. Please refer to the responses above to “Common themes of DEIS Addendum comments” earlier in this section of the FEIS. References to Washington State Department of Ecology stormwater management regulations and City of Shoreline critical areas regulations have been re-emphasized and expanded in the FEIS. Under these regulations, redevelopment projects must control hydrologic flows, protect water quality, and preserve habitat. Unlike past development in the subarea, which did lead to interruptions in surface and groundwater flows, new redevelopment would need to control flows and protect the hydrologic regime of surrounding critical areas. All public park and open space areas would be retained and protected with implementation of any of the action alternatives. The FEIS analyzes a new alternative, Alternative 4—Compact Community Hybrid, which retains areas surrounding Paramount Park, Paramount Open Space, and Twin Ponds Park in single-family (R-6) zoning.

**From: Shoreline Preservation Society, c/o Janet Way**

**Received: March 21, 2016**

Dear Planning Commission and Mr Szafran:

Please accept our additional comments on the Addendum to the 145<sup>th</sup> DEIS and Subarea.

**Planned Action Ordinance**

We wish to point out that one crucial aspect of the City’s plans will have an additional negative impact to the environment. That is the proposal to pass another Planned Action Ordinance as was done on the 185<sup>th</sup> Subarea. The reason this would be particularly detrimental is

that because there are so many sensitive or critical areas such as wetlands, creeks and steep slopes in the 145<sup>th</sup> Light Rail Station Area, they are at risk because of the way the City is going about the EIS and Subarea planning effort.

The City proposes to use the Planned Action Ordinance as an overall statute allowing development to go forward without any further input from the public. The staff state repeatedly that any particular environmental issues such as wetlands on or near properties with development proposals would be protected by further environmental review conducted by the City and individual developers. But unfortunately, there would be no notice, no comment period and no potential for appeal for any members of the public who wish to provide information about particular sites proposed for development. Frequently with input from the public, the staff are made aware of special circumstances on a site, such as a wetland, a buffer, an easement, or a traffic or infrastructure detail that has been unknown to the City or developer. Because each site is unique, especially the ones surrounding the three major parks in the 145<sup>th</sup> Rezone area, it is highly valuable for planning staff to include this input from the public in determining environmental impacts of a particular development.

But none of this would be possible because the Planned Action Ordinance prevents any input from knowledgeable members of the community.

Therefore, we respectfully suggest that the Planning Commission should pass whatever Subarea zoning they intend to WITHOUT a Planned Action Ordinance. You could require instead a SEPA process for any of these newly zoned properties. Also, if Phasing is used and Phase I is confined to areas around to Stations within say a two-block section, for instance, that Phase I should have a 20-year timeline. That way the City could reasonably observe the progress of that Phased Zone and how it is actually affected by the traffic and any development that does occur there. We recommend keeping the areas adjacent to the parks at R-6 for that first Phase. Perhaps some of the areas in between could be denser. But, by and large this would prevent the unintended consequences of a rush to upzone the sensitive areas around the parks. The many wetlands could be adversely affected by dewatering or diversion of water sources, as happened at the Aegis site with Peverly Pond, which has disappeared.

We also think it is important to point out that the Planned Action Ordinance is a particularly clumsy tool, normally conceived as a way for cities to work with one or two major developers in a defined area. Instead in this case, it is being used not to thoroughly plan on a project level, but is completely avoiding specific details that should be included in the EIS to understand the actual environmental impacts of any developments within these huge rezone areas. And, one of the worst aspects is that any member of the public, who normally would have a right to notice and to comment on proposed developments in their neighborhood, would be completely excluded. This is not good planning and it is not good public policy. The Addendum to the DEIS is proof of this problem. It has been admitted already by staff and even OTAK that the review was not based on Best Available Science, Data or even fact. It has been admitted to be just a cursory overview of some aspects of the Parks. The Twin Ponds wetland delineation is not even completed yet. The previous City documents such as the 2004

Thornton Creek Characterization Study are not even included, though it is much more thorough. Clearly, more information is needed to inform this DEIS process before any decision to move forward is made.

### **Parks and Open Space**

We believe that the Preferred Alternative being currently proposed is again too much development, too soon without an appropriate level of planning for our Parks and Open Space needs. The impacts of Upzoning around these three major parks has not been fully analyzed. How would these parks be affected by taller buildings surrounding them? How would height, bulk and scale impact these parks? How would additional shading affect them, their recreational value and the wildlife areas within? How much Open Space and recreation is required for the expected increase in population? How would the Upzoning and population increases affect local schools? The Shoreline School District has expressed concern about their capacity to handle the increased school aged family size increase and how it would affect their ability to accommodate these new students. They have warned that one of the most popular parks in the City, the Paramount School Park, which is owned by SSD, might have to be returned to use as a school property. How would that affect the hundreds of families and park users, including sports teams that utilize Paramount School Park?

Some sensitive areas surrounding the local parks need to be protected from the pressures to develop. Many of these properties are steep forested slopes, stream or wetland buffers. What are the plans on the Pro Parks initiatives? How much would it cost the City to acquire these sensitive areas to protect them? Has that been analyzed in this Addendum to the DEIS? We do not see much discussion of that in the Addendum to the DEIS

### **Trails and Bike/Ped Routes**

Have the trails through Paramount Park or other parks been analyzed to determine what it might take to upgrade them for bike/ped pathways, possibly with boardwalks to protect sensitive areas, safety and possible lighting issues? The idea of a trail through Paramount Park has a lot of advantages as an additional option for Bike/Ped users to avoid 145<sup>th</sup>. Drainage is an important matter to consider with the “Greenways” that are included in the plans. Have LID techniques been included in analysis of this proposal for trails and paths with trees? What will it cost for the drainage and for tree planting? Will property acquisitions be considered as part of the “Greenways” planning? How much would that cost and what are the sources of potential revenue to pay for them? Have culverts that are connected been analyzed according to state law? Those must be considered to find ways to improve the watershed areas.

### **Traffic Impacts of Light Rail Station and 145<sup>th</sup> Corridor Proposals**

There is a big potential problem with the process to move forward with Preferred Alternative on the Subarea, when the City has not yet completed its environmental review process on the 145<sup>th</sup> Corridor Study or the Light Rail Station design.

There has been no serious evaluation connected with this addendum or EIS of how traffic attracted to the Light Rail Station or 145<sup>th</sup> Corridor would impact or be impacted by Upzones and the Subarea Plans. How many buses would have to access Fifth NE hourly, daily, or weekly? How would cut-through traffic affect the neighborhood? How would excess parking affect the neighborhood? How will the added street lights affect traffic flow? How will additional density affect access to Light Rail and 145<sup>th</sup>? How will bus and auto traffic affect the I-5 bridge and how will changing the entrances and exits to I-5 change traffic patterns in the neighborhood? These are all important questions that will affect the subarea. How will the massive tree removal along I-5 for Light Rail impact air, water and sound quality in the neighborhood?

The intersection at Fifth NE and 145<sup>th</sup> is already dysfunctional. Even on recent Saturday and Sunday afternoons there is traffic backed up through two light changes. This is already unacceptable.

We also need to reiterate that the 145<sup>th</sup> Corridor project must include provision to replace the perched culvert under 145<sup>th</sup> by State and Federal law to reconnect fish passage on Littles Creek. Littles Creek is a major tributary of Thornton Creek and the current culvert is illegal.

If the EIS for the 145<sup>th</sup> Corridor Study is not to be completed for over a year from when Council selected a Preferred Choice, how can the 145<sup>th</sup> Subarea be planned and approved without adequate information?

Considering the facts that there is so much missing information to address the Addendum for the DEIS, we conclude that the Planning Commission must take a more thoughtful and reasonable approach. We ask that the Commission request more information be studied. Include the existing City documents that have already been done such as the 2004 Thornton Creek Watershed Characterization Report, the upcoming Twin Ponds Wetland Delineation and the 145<sup>th</sup> Corridor Study. We ask that these be included and that the Commission should delay making a recommendation to the Council until a more complete Addendum is provided.

Also, since a new version of the Planning Commission 145<sup>th</sup> Committee Preferred Alternative is being put forward and the community has not been notified of this revision, there is ample reason to extend the comment period until after these changes and information has been made available to the public and proper notice has gone out to surrounding communities.

We also strongly urge that the Planning Commission consider rejecting the proposal for a Planned Action Ordinance because it leaves too much to chance and there is too much environmental risk at stake. Instead we suggest imposing a SEPA review process that will provide proper oversight.

We also ask that the Commission consider concentrating on Phase I of the Subarea Upzone near the Light Rail Station, and delay the upzoning of Phase II for at least 20 years. That way you can keep the low scale R-6 zoning around the parks to prevent negative impacts and unintended consequences.

Finally, we strongly urge that a Critical Areas Overlay be included in the Subarea. This should be studied in the DEIS. But it would give an important extra layer of protection to these important sensitive and recreation areas.

Thank you for the opportunity to comment.

Sincerely,

Janet Way, President  
Shoreline Preservation Society

**Response:**

Comments are noted. Regarding your comments on the DEIS Addendum, refer to the responses to “Common themes of DEIS Addendum comments” above. All public park and open space areas would be retained and protected with implementation of any of the action alternatives. The FEIS analyzes a new alternative, Alternative 4—Compact Community Hybrid, which retains areas surrounding Paramount Park, Paramount Open Space, and Twin Ponds Park in single-family (R-6) zoning. You submitted comments on the DEIS in your letter above outside the comment period of the DEIS. However, please refer to the responses above to “Common themes of DEIS comments” earlier in this section of the FEIS for responses on the planned action ordinance, trails and bike/ped routes, traffic impacts, and other topics.

**From: Thornton Creek Alliance c/o Ruth Williams**

**Received: March 21, 2016**

Dear Ms. Markle:

This letter follows up comments that Thornton Creek Alliance submitted to you in an earlier letter on the NE 145th St. Station Subarea Plan on January 29, 2016, and related testimony that we provided at the Shoreline Planning Commission meeting on March 17, 2016. This letter identifies specific concerns that we have about the Draft Environmental Impact Statement for the plan, the Addendum to the DEIS

submitted by OTAK Inc. on January 29, 2016, and the Preferred Alternative that the Planning Commission may recommend for inclusion in the Final Environmental Impact Statement.

*Draft Environmental Impact Statement*

The DEIS certainly needed an addendum regarding environmental impacts. Chapter 3.5, on "Parks, Recreation, Open Space, Natural Areas and Priority Habitat Areas" is almost entirely focused on recreational needs for parkland. The analysis of habitat impacts essentially presumes that the critical area ordinance is sufficient to protect against all potential impacts of denser zoning. Despite the statement on page 3-185 that "Areas of urban forest are more vulnerable to potential impacts associated with redevelopment in the subarea," the DEIS provides no analysis of these impacts beside recounting the provisions of the City's critical area ordinance and referencing stormwater regulations, before concluding on page 3-188 that the development alternatives being reviewed would have "no significant unavoidable adverse impacts" to "open space...and sensitive natural areas and resources."

The Washington Department of Ecology is more skeptical about the ability of its own stormwater management regulations to protect against degradation:

Ecology understands that despite the application of appropriate practices and technologies identified in this manual, some degradation of urban and suburban receiving waters will continue, and some beneficial uses will continue to be impaired or lost due to new development. This is because land development, as practiced today, is incompatible with the achievement of sustainable ecosystems. Unless development methods are adopted that cause significantly less disruption of the hydrologic cycle, the cycle of new development followed by beneficial use impairments will continue. [Western Washington Stormwater Manual, Volume I, Minimum Technical Requirements, December 2014, p.1-24]

We would also point to the research of University of Washington Professor John Marzluff, whose book *Welcome to Suburbia: Sharing Our Neighborhoods with Wrens, Robins, Woodpeckers and Other Wildlife* summarizes decades of his and others' research, which points to the surprising conclusion that the highest diversity of birds can generally be found in suburban neighborhoods (with zoning no denser than the R-6 now in place in most of the 145 St. Subarea) adjacent to forested reserves (such as Paramount Open Space, South Woods, Hamlin Park and parts of Jackson Park). Diversity in these areas can be higher than in large, protected natural areas because collectively they provide more diverse habitats, the bird feeders and nesting boxes found in suburban gardens meet real needs of birds at different stages of their lives, and the tree canopy in traditional suburban neighborhoods extends the benefits of adjacent forested reserves. This is an aspect of urban and suburban development not accounted for by critical area regulations, which do not focus at this larger, landscape level.

*OTAK Addendum*

The Addendum to the DEIS provided by OTAK looks in much greater detail at the streams and wetlands in Paramount Open Space and Twin Ponds Park (although we believe the critique of the Addendum submitted to the City by Cooke Scientific on behalf of the Shoreline Preservation Society raises many valid points of concern about this detail). The Addendum continues to presume that critical area regulations are sufficient to protect habitat values even against much denser adjacent development, to the point that it argues that habitat values will see a net benefit from much denser development, since existing legal nonconforming uses would be replaced by new development that must be further away from streams and wetlands to comply with current regulations. Again, the Addendum does not consider larger landscape aspects of redevelopment, which would gradually replace the current matrix of suburban habitats in-between natural area reserves with more and more hardscape. This transformation would, according to Professor Marzluff's research, reduce the bird diversity found in both the developed landscape and the reserves, since many bird species regularly move between both.

We would also note that Figure AW-1 in OTAK's report, "Critical Areas - Paramount Park," does not, in fact, seem to substantiate the report's claim that there are currently structures actually located in the wetlands that extend out from the park. Certainly no houses appear to be in the wetlands. There are six houses along 12th Avenue Northeast that are within wetland buffers, but in five of these cases all or essentially all of the parcel is inside the buffer and in the other case far too little of the parcel is outside the buffer to be developable. This means that reasonable use requirements would almost certainly still allow redevelopment inside the buffer. Even at the parcel level, then (let alone the landscape level that OTAK ignores), the report is misleading at best, and mostly appears to be simply wrong regarding the impacts of redevelopment on habitat.

*Preferred Alternative*

As stated in our testimony on March 17, Thornton Creek Alliance recommends the following for the City's Preferred Alternative:

- The Compact Communities alternative, vs. Connected Corridors;
- A phased approach that focuses initial redevelopment closer to the Sound Transit station;
- Inclusion of the "Green Network" of pedestrian and bicycle pathways through the Subarea, at least to connect with and complement the Off Corridor Bicycle network ; and
- A Critical Areas Overlay (which would include buffers for steep slopes and geologically hazardous areas in addition to streams and wetlands), which would require that any new development under the updated zoning standards must be completely outside of critical areas and their buffers.

We also support Planning Commissioner Montero 's suggestion that the area immediately east of Paramount Open Space and south of Paramount Park be placed in the MUR-35 zone and be prioritized for future acquisitions that would better tie the two green spaces together. The undeveloped and completely forested parcel at 14729 12th Ave NE, immediately south of the City's street end at NE 148th St., is another obvious candidate for acquisition, especially since it includes substantial wetland areas.

Lastly, we want to reiterate our interest in the other recommendations made in our January 29 letter concerning preservation of vegetation, use of green infrastructure, restoration within Paramount Open Space, and requirements for wildlife-friendly features in new developments under the updated zoning.

Thank you for the opportunity to comment on the NE 145th rezone. If you have questions about our comments, please contact TCA board member John Lombard, at [jlombardwriter@gmail.com](mailto:jlombardwriter@gmail.com) or 206-788-6443.

Sincerely,

Ruth Williams

**Response:**

Comments are noted. Refer to the responses above to “Common themes of DEIS Addendum comments” earlier in this section of the FEIS. References to Washington State Department of Ecology stormwater management regulations and City of Shoreline critical areas regulations have been re-emphasized and expanded in the FEIS (see Chapter 3, Section 3.4). Under these regulations, redevelopment projects must control hydrologic flows, protect water quality, and preserve habitat. The City’s critical areas requirements also call for preserving trees and vegetation in critical areas, regardless of the zoning designation. All public park and open space areas would be retained and protected with implementation of any of the action alternatives. The FEIS analyzes a new alternative, Alternative 4—Compact Community Hybrid, which retains areas surrounding Paramount Park, Paramount Open Space, and Twin Ponds Park in single-family (R-6) zoning.

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## ***Responses to Comments Submitted via Spoken Testimony on the DEIS Addendum by Individuals and Groups at the February 18, 2016 Planning Commission Meeting***

Following are responses to comments submitted via spoken testimony at the February 18, 2016 Planning Commission meeting.

### **Janet Way, Shoreline Preservation Society**

Requested that the society have legal standing and be part of the public record pertaining to this agenda item. She commented that Paramount Park is an extraordinary place; not a degraded place that has no value. There is nothing else like it in the entire watershed and/or City. She said she has lived next to Paramount Park since 1988, and she has been working on its restoration and protection since 1989. Many projects have been done at the park via various groups, such as the Paramount Park Neighborhood Group and the Shoreline Preservation Society. She provided photographs of Littles Creek, which used to be called a Class II Stream. Although fish have trouble getting there because of the perched culvert that goes over to Jackson Park, there is a history of cutthroat trout and Coho salmon, and the stream should not be classified as non-anadromous. She provided photographs and described the various restoration projects that have occurred in the wetland and meadow area using grant funding from both the City and the County. She also provided photographs of the wildlife and plant species that exist at Paramount Park and the culvert on Littles Creek that needs to be replaced as part of the rezone to resolve flooding issues and create a bicycle path.

Ms. Way said that although the 2000 Thornton Creek Watershed Characterization Report, which talks specifically about the wetlands at Paramount Park, was referenced in the study, she voiced concern that the study undervalues the wetland. She reminded the Commission that the Army Corps of Engineers designated the wetland's overall size as 6.5 acres, and the report reduces the size by about half. She commented that as per the CAO, the City should go above and beyond to protect, not reduce, wetland. As public stewards, she begged the Commissioners to do everything in their power to enhance the wetland, not degrade it.

### **Response:**

Comments are noted. Refer to the responses above to "Common themes of DEIS Addendum comments" earlier in this section of the FEIS.

### **Yoshiko Saheki**

Observed that the Staff Report makes the point that, *"If single-family properties were not rezoned or did not redevelop, these non-conforming uses would remain indefinitely, neither posing significant new adverse impacts to wetlands and streams, nor providing opportunities for restoration."* Although OTAK's report is about redevelopment, no statement was included to indicate that the current

zoning would provide no opportunities for restoration. She pointed out that homeowners could create raingardens, remove impervious patios and lawns, and plant native trees and vegetation, which are all good for the environment.

Ms. Saheki noted that in her summary, Ms. Roberts writes that if single-family zoning were to convert to mixed-use residential, *“critical areas could be further protected and enhanced through future redevelopment under rezoning.”* In addition, the technical assessment concludes that, *“redevelopment could create substantial opportunities for ecological improvements and enhancements that do not currently exist.”* She summarized her belief that a lot of things are possible, both with and without redevelopment. Further, protection and enhancement of critical areas is possible under the status quo, and restoration by current homeowners may even be more easily achieved than through redevelopment, which after rezoning, would require willing sellers, buyers and developers.

Ms. Saheki referred to the statement that, *“non-conforming uses could be removed from critical areas.”* In this case, the reference to non-conforming uses applies to single-family homes. She emphasized that removal of these non-conforming structures is a possibility and not a certainty. While everyone wants what is best for the environment, she reminded the Commission that they are talking about peoples’ homes. The slightest implication that the City is interested in removing homes will cause the plans to backfire no matter how well intentioned. If either of the zoning alternatives are adopted, most of the single-family development in the subarea will become non-conforming. To read that non-conforming uses could be removed does not encourage people who live in the subarea to embrace the proposed rezone. She suggested there are more respectful ways to say the same thing, and the word “removed” is a little harsh.

**Response:**

Comments are noted. More detail has been integrated into the FEIS related to the DEIS Addendum and critical areas protection requirements.

**Dave Lange**

Referred to Page 2 of the report, which discusses opportunities for restoration. He pointed out that Little Creek is contained in the north/south pipe under 145<sup>th</sup> Street, which exits above the water level on the Jackson Park side. Re-drilling the pipe way for a larger diameter would provide an opportunity to change its shape and orientation down to the water level on the south side. Balancing restoration with handling stormwater should be the type of win/win the City looks for and writes up in its *CURRENTS* publication. He recalled that, at the last City Council meeting, it was pointed out that the Thornton Creek Basin was an early study that needs to be updated to address concerns that were addressed in later studies. He expressed his belief that not completing an update to the basin study before alternatives are selected may result in poorly-informed decisions.

**Response:**

Comments are noted. More detail has been integrated into the FEIS related to the DEIS Addendum and characteristics of the Thornton Creek Basin from previous studies. Refer to Chapter 3, Section 3.4.

**Thomas Poitras**

Recalled that a number of trees died last year as a result of the drought. He asked if the City has studied or intends to study the net effect of the new impervious surfaces. He does not see how ground water would be replenished in local areas if the land is covered with concrete.

**Response:**

Comments are noted. Refer to Chapter 3, Section 3.4 for a discussion of regulations that would apply to new development related to surface water management.

**Chris Southwick**

Reiterated that wetlands are nature's sponges. They filter water and provide erosion control and habitat for wildlife. It is important to retain as many wetlands as possible, and the effectiveness of a wetland is reduced whenever its size is reduced or infringed upon.

**Response:**

Comments are noted. Refer to Chapter 3, Section 3.4 for a discussion of the City of Shoreline's Critical Areas requirements and other regulations related to protection of wetlands.

***Spoken Testimony on DEIS Addendum—March 3, 2016 Planning Commission Meeting*****Janet Way, Shoreline Preservation Society**

Asked that the Commissioners take the Hippocratic oath, "First, do no harm." She questioned how the people who live within ½ mile of the 145<sup>th</sup> Street Station Subarea would benefit from the plan. She also asked the Commission to consider the following:

- The culvert under 145<sup>th</sup> Street for Little's Creek should be a very high priority. Her understanding is that State Law and agreements with the Tribes require that the culvert be replaced. It is supposed to be a salmon bearing stream, yet fish cannot currently get up it.
- The culvert for Thornton Creek should be improved by putting in baffles so the fish can navigate more easily.

- A number of issues identified in the wetland study for Little Creek would also apply to the 145<sup>th</sup> Street Corridor. The buffer and liquefaction zone need to be considered as mitigation.
- Other environmental issues to consider include noise and vibrations.
- As she mentioned in a letter a few months ago, there is an opportunity to provide a bicycle path through Paramount Park, but it was not included in the plan. There are also opportunities to improve drainage in this location.
- Everything possible should be done to discourage bicycles on 145<sup>th</sup> Street. It will cost a lot of money to acquire the extra ROW, and the bikes can be accommodated more safely on other streets.
- There has been some discussion at the Council level of having a bicycle/pedestrian bridge at 147<sup>th</sup> Street. If another bridge is going to be built anyway, why not put it on 147<sup>th</sup> to avoid conflicts at the intersection of I-5 and 145<sup>th</sup> Street?
- The estimated increase in traffic of just 1.5% seems too low. The City needs to better analyze future traffic volumes with the thousands of additional residents anticipated as a result of the rezone.
- The transition to 5<sup>th</sup> Avenue NE is crucial. It will be a nightmare while it is being built, and it could also be a nightmare after it is finished.
- Safety should be the watchword. The 145<sup>th</sup> Street Corridor is not safe now, and if it is not planned properly, it will not be safe in the future. People have been hit and killed on the street, and it is important to change that.

**Response:**

Comments are noted.

***Spoken Comments on the DEIS Addendum—March 17, 2016 Planning Commission Meeting*****Wendy DiPeso**

Said she had to leave the meeting early and wanted to provide her comments regarding the potential zoning scenarios for the 145<sup>th</sup> Street State Subarea Plan. She recalled that the consultant's (Otak) report indicated that it is possible to engineer and do construction on top of peat and wetlands. She also heard that it is possible to engineer development on steep slopes but it is costly. Although it may be possible to do this type of development, she questioned if it is something the City wants to encourage. She expressed her belief that developers will not likely want to spend large amounts of money to engineer development within wetlands and buffers so it is not really necessary to rezone these areas as high-density. They will be interested in land that is more suitable for high-density development.

Ms. DiPeso questioned why the City found it necessary to hire Otak when they already have the Thornton Creek Basin Characterization Report, as well as other similar reports that are more comprehensive and detailed than the report provided by Otak. She suggested that the City did not like the answers provided in the information that was already available so they used taxpayer dollars to hire Otak to give them the answers they wanted. Regardless of whether or not this perception is accurate, that is how the public views these kinds of transactions.

**Response:**

Comments are noted. Refer to Chapter 3, Section 3.4 of the FEIS. The 2015 assessment of wetlands and streams completed by Otak, Inc. was focused on wetlands and streams on public property in the subarea and more limited in geography than the earlier 2004 Thornton Creek Basin Characterization Report. The 2015 assessment (encompassed in the DEIS Addendum) was preliminary and not a detailed delineation, which would be required later with redevelopment. The assessment was conducted to gain a more up-to-date understanding of potential wetlands, streams, and buffers on public properties in the subarea given that the 2004 basin characterization study references wetland delineation work from 1989. Information from both the DEIS Addendum and the 2004 basin characterization report have been integrated into Section 3.4 of the FEIS.

**Nancy Morris**

Asked the Commission to use caution and care, as well as a science-based assessment of Paramount Park before minimizing its importance and infringing upon its established borders for the sake of unchecked development. Years of dedicated volunteer work went into the park to restore its grounds and wetlands. She emphasized that wetlands are vital for clean water and wildlife habitat, and Paramount Park is one of the largest in Shoreline at 6.9 acres. She questioned why various streams and other aspects of the park were missed in the recent report done by Otak. It is disconcerting that the City already had detailed information but hired another outside firm to do a report.

**Response:**

Comments are noted. Refer to Chapter 3, Section 3.4 of the FEIS. The 2015 assessment of wetlands and streams completed by Otak, Inc. was focused on wetlands and streams on public property in the subarea and more limited in geography than the earlier 2004 Thornton Creek Basin Characterization Report. The 2015 assessment (encompassed in the DEIS Addendum) was preliminary and not a detailed delineation, which would be required later with redevelopment. The assessment was conducted to gain a more up-to-date understanding of potential wetlands, streams, and buffers on public properties in the subarea given that the 2004 basin characterization study references wetland delineation work from 1989. Information from both the DEIS Addendum and the 2004 basin characterization report have been integrated into Section 3.4 of the FEIS.

### Yoshiko Saheki

Distributed a handout with “before and after” photos taken of a segment of 1<sup>st</sup> Avenue NE. The top image is the most recent aerial photo taken in 2012, and the lower was taken in 1999. She noted the southernmost portion of Twin Ponds Park on the left side of both images. She asked the Commission to consider retaining R-6 zoning for the private properties near critical areas in parks. She believes the status quo is in the best interest of public critical areas. The operative principle is the Critical Areas Ordinance (CAO), which would apply whether the properties are up zoned or not. Since the CAO applies to properties as single-family homes, it seems that public critical areas would be better protected without changes in zoning. She asked the Commissioners to consider what happened to a critical area after the construction of Aegis Assisted Living on 1<sup>st</sup> Avenue NE, as illustrated by the images. She acknowledged that the facility provides amenities to the general public and future density may bring other new amenities. However, Beverly Pond, a small body of water located on the east side of 1<sup>st</sup> Avenue NE, was lost when Aegis was developed. The pond through which Thornton Creek flowed has drained and is now a wetland instead of a pond. When it was a pond, there was a bridge on the western edge that was visible from the street, which gave some charm to the neighborhood. More importantly, what was an open body of water for Thornton Creek is gone.

Ms. Saheki noted that Aegis has buildings much larger than single-family homes and future structures under the new MUR zones will probably be similar in size and scale. While she recognized that the single-family homes near Twin Ponds Park could not be constructed based on the current CAO, the existing development allows the current wetlands and ponds to continue. Again, she asked the Commission to retain properties near public critical areas to remain as R-6 zoning.

#### Response:

Comments are noted. Alternative 4—Compact Community Hybrid retains areas adjacent to the parks in R-6 zoning and is studied in this FEIS.

### John Lombard, Seattle

Said he was present to represent the Thornton Creek Alliance, which has members in both Shoreline and Seattle. He said the Alliance submitted a letter to the Community Development Director on January 29<sup>th</sup>, which was copied to the Commission and Council. His comments elaborate on the concerns contained in the letter, relating them to the DEIS and the addendum, as well as the choice of a preferred alternative. He referred to a book he authored titled, “Saving Puget Sound,” as well as a book titled, “Subirdia,” which was mentioned in the letter from John Marzluff, and a report by Don Norman that was attached to the list of bird species that have been found in Paramount Park and surrounding neighborhoods. He made the key point that wildlife benefits from natural reserves like Paramount Park, but they benefit much more if the surrounding areas compliment rather than conflict with the reserves. Both Professor Marzluff and Mr. Norman note that typical suburban residential development compliments reserves to the point that bird diversity can actually be

greater in those areas than you would find in some large, protected preserves. The bird feeders, nesting boxes, and forested canopy compliment and expand the area of trees and vegetation that the reserve, itself, provides. He voiced concern that this point is not recognized or even addressed in the DEIS or in the addendum. While the addendum looks at parcel-level improvements when non-conforming uses redevelop under new regulations, it does not address the larger landscape level issue that is central to the Alliance's concerns and is central to the research of Professor Marzluff and Mr. Norman.

Mr. Lombard said the Staff Report states that the EIS should evaluate the maximum possible impacts before a final decision is made that might actually reduce them. He expressed his belief that this statement is an accurate characterization of the Planning Commission's responsibility to recommend a preferred alternative that seriously considers possible modifications to alternatives that are in the DEIS. He said the Alliance supports the Compact Communities Alternative, with the critical areas overlay and with the understanding that, within the overlay, it would be appropriate to have more limited development. The Alliance would appreciate clarification as to the City's views of the implications of the critical areas overlay. The Alliance would prefer a phased approach and they support the Green Network, which was in the original DEIS proposal. The Alliance is unclear about the significance of staff's recommendation to replace the Green Network with the Off-Corridor Bicycle Network. They support trees and vegetation across corridors throughout the area rather than just focusing on bicycle traffic on the roads. There are fewer areas that are identified as connecting corridors in the Off-Corridor Bicycle Network as compared to the Green Network.

Mr. Lombard commented that Ms. Way would be sharing the results of a report done by Dr. Sarah Cook, which differs with the addendum as to the location, size and category of the wetlands found in Paramount Park and the surrounding area. The report also differs with the addendum in regards to stream locations, and she highlights the significance of soils and geology in the area, both for the actual developability of properties surrounding Paramount Park and for the impacts the development would have on streams, wetlands and habitat.

**Response:**

Comments are noted. Refer to the responses above to "Common themes of DEIS Addendum comments" earlier in this section of the FEIS.

**Janet Way, Shoreline Preservation Society**

Spoke representing the Shoreline Preservation Society. She requested that the Society have legal standing and become a party of record. She asked that all of her comments (previous, present and future) be adopted into the record by reference. Given the new addendum and potential changes, she also requested that the comment period be extended at least until the proposal has been presented to the City Council. She expressed her belief that the City needs to go back to the drawing board on the addendum. She presented the Commission

with a number of items, including a report by Dr. Sarah Cook. She also provided pages from the City's 2004 Characterization Report, which states quite clearly (Page 417) that, "Paramount Park (Paramount Open Space) between 10<sup>th</sup> and 12<sup>th</sup> Avenues NE, north of 145<sup>th</sup> Street is one of the largest wetlands in the City, at approximately 6.9 acres." She said she is curious why the new characterization report diminishes the wetland down to less than 2 acres. From listening to the consultants present the report, it appeared that the only reason for doing this was to increase the area available for redevelopment. She emphasized that it is the City and Planning Commission's job to protect, enhance and even expand the wetlands and open spaces. If more density is added around the station, the wetland will have to absorb a lot more runoff, pollution, etc.

Ms. Way commented that Paramount Open Space is an extraordinary place, and she invited Commissioners to visit. There is no other place like it in the entire watershed or in the City. It retains huge amounts of clean water, and it is a major headwater of Thornton and Littles Creeks. It is also a vital wildlife corridor that provides clean air and clean water. Protecting and enhancing the wetlands and open space becomes even more important as density is increased. When the Commission gets to the point of making a recommendation on zoning, she asked that the areas around Paramount Open Space retain their current R-6 zoning. It will be a detriment to the City to allow development to occur right up to the wetlands. The Society and other groups have done an enormous amount of restoration and enhancement at the park, and there are more areas that need to be fixed. The City should go out of its way to protect it. She said her same comments would apply to the wetlands and streams in Twin Ponds Park, as well. She emphasized that the public should be notified if the map is changed at some point in the future.

**Response:**

Comments are noted. Refer to the responses above to "Common themes of DEIS Addendum comments" earlier in this section of the FEIS.

**Patty Hale**

Said her husband was the superintendent for Turner Construction, the general contractor for the light rail station on Capitol Hill. She noted that not seen are the 6-story, 65-foot maximum height mixed-use buildings that are anticipated to be developed. Even Capitol Hill, with a light rail station that connects most of Seattle, does not have the heights that are currently being proposed for the 145<sup>th</sup> Street Station.

Ms. Hale referred to Ms. Redinger's comments about density around the park and reminded the Commissioners that Paramount Park is already programmed at capacity during the sport seasons. Adding more density will not give more people places to play. She voiced her belief that R-6 density should be around the perimeter of the upper portion of Paramount Park. She reviewed the historic drainage problems associated with this area of the park, which only got worse when Paramount Park Elementary was demolished and the playfields were put in. When the City incorporated, the playfields had to be redone to address a variety of drainage problems. Allowing more

development will decrease the ability for absorption to take place naturally. She recommended that the City maintain minimum soil disruption and limit development around the upper Paramount Park Playfield and natural space, as well as Twin Ponds Park. These open spaces help control water runoff, and covering them with development is not the right approach.

**Response:**

Comments are noted. Refer to Chapter 3, Section 3.5 for a discussion of the demand for parks and open space areas related to the three action alternatives analyzed in the FEIS. All public parks and open space areas would be preserved under any of the alternatives.

**Corey Secrist, PhD**

Said he first found Paramount Park while on a bicycle ride, and he decided to purchase a home in Shoreline that was within walking distance to the park. He views the parks as the jewels on a necklace, and he urged the City to protect them. He does not support the plan for additional density, but even from the perspective of trying to increase population and create commercial viability, the parks are high selling points for attracting new residents to the area. He said the Commission should keep in mind that denser development will result in less soil to absorb the water, and the parks will be very important to maintain the flow of clean water and produce clean air. He asked the Commissioners to carefully consider the reports submitted by the Shoreline Preservation Society that outline how Paramount Park has and will continue to change.

**Response:**

Comments are noted. Refer to Chapter 3, Section 3.5 for a discussion of the demand for parks and open space areas related to the three action alternatives analyzed in the FEIS. All public parks and open space areas would be preserved under any of the alternatives.

**Sarah Cook, PhD**

Said she was hired by the Shoreline Preservation Society to examine Paramount Park. She pointed out that the Growth Management Act (GMA) requires that counties and cities use Best Available Science (BAS) in developing policies and regulations to protect the functions and values of their critical areas. All the ensuing studies and policies must take BAS into consideration before any activities are undertaken in critical areas that might affect their integrity. She emphasized that the Paramount Open Space and the adjacent neighborhood to the east is the largest remaining wetland area in Shoreline and the Thornton Creek Watershed. For that reason, the Commission needs to consider the importance of the area. She also emphasized that since the headwaters of the entire Thornton Creek Basin is located within Shoreline, the increased percentage of impervious surface will certainly affect the downstream receiving water.

Dr. Cook referred to her detailed report, which was previously submitted to the City. She asked that the Commissioners read the report, which consolidates all the information that was included in the 2004 Thornton Creek Watershed Report that was done by Tetra Tech and is a much more comprehensive study than the study performed by Otak. Her report also summarizes some of the information in the 2004 Thornton Creek Watershed Report that included all of Shoreline and Seattle. She said her report examines soils information because the City's geotech report does not cover soils and there is currently no mapping for the soils in the City of Shoreline. While it is known that there is a high percentage of peat deposits in both Twin Ponds and Paramount Parks, the City does not know where they are located. Therefore, the potential for development becomes very difficult to identify. The newest geotech report only looked at the potential problems of peat deposits and high ground water from the perspective of how it would impact development. They did not consider what compacting peat soils and building on them could do to dewater the wetlands and streams within the Thornton Creek Watershed.

Lastly, Dr. Cook said she reviewed the accuracy of the wetlands and streams mapping done by Otak during the dry season of 2015 versus the study that was done in 2004 by Tetra Tech. She reported that she and Ms. Way visited each of the areas where there are discrepancies between the old and new maps, and Figure 6 of her report identifies each of the areas where she found wetlands and Otak did not. She encouraged the Commissioners to review her report, which consolidates the information in the old report and compares it to the new Otak reconnaissance. She concluded that when making an informed decision relative to zoning, it is important for the Commission to use the larger acreage (6.9) and the alignments of streams contained in the City's GIS database rather than the new work that was done by Otak, which she feels is very inaccurate.

**Response:**

Comments are noted. Refer to the responses above to "Common themes of DEIS Addendum comments" earlier in this section of the FEIS.

**Jeff Eisenbray**

Said his interest is in preservation of the unique views from Paramount Park. In this lowest income area of the City, it affords views to the south, east and west, and the current plans would block the views completely and diminish the value of the park to the community. He noted that none of the alternatives provide provisions for the protection of riparian recharge areas, and he supports the concerns raised by the previous speakers. He asked that the City create maps that describe flood water retention zones. To construct to the proposed density, he presumes there will be retention ponds, but the locations are not indicated anywhere. This information would be helpful for citizens to envision how the buildout is supposed to look in the future. He also asked the Commission to consider protection of single-family homes from the loss of southern exposure, especially those that border 155<sup>th</sup> Street. A full build out means that adjacent properties would be completely shaded from their southern exposures.

Mr. Eisenbray said he would like to see prescribed building standards for LEED Certification and to minimize the effects of impermeable surfaces. There are a number of environmentally-sensitive building practices that could be required in these areas to guarantee that the quality of construction is very high. He said he finds the parking projections to be unrealistic, and he asked that they be upgraded. He does not know of any examples in his neighborhood of licensed drivers who do not have a vehicle. While it is a lovely idea to provide neighborhoods that encourage walking, the reality is they become choked with cars when no off-street parking provisions are in place.

**Response:**

Comments are noted.

**Lindsay Hannah**

Said she recently purchased a home in the North City Neighborhood and chose to move to Shoreline because she is excited about light rail. She is also excited about the subarea station planning, which is a huge draw to Shoreline right now. She loves the characteristics of the neighborhoods and her single-family home, and she commiserates with those who have concerns with the changing characteristics of their neighborhoods, especially around the 145<sup>th</sup> Street Station. At the same time, she expressed her belief that it will be a huge asset to the community in the future to have TOD. As a resident who just moved to the City, she looks forward to the walkability, bikeability and near proximity that light rail will provide.

Ms. Hannah referred to the thoughtful concerns that were raised about critical areas, and she urged the Commission to take the concerns into consideration as they move forward and refine the details of the Subarea Plan. She emphasized the importance of keeping momentum going by deciding which zoning option to move forward with, and she believes the Compact Community Alternative is more attractive unless the 5<sup>th</sup> Avenue residents are urging a rezone at this time. She would prefer to keep the growth consolidated around the light rail area. If there is a desire to expand the more intense zoning out through the corridors, it could be an option at a later point.

**Response:**

Comments are noted.

**Tom Lawler**

A resident of the Meridian Park Neighborhood, he stated that he agreed with the comments provided by Ms. Hannah. As a young person who recently moved to Shoreline, he is excited about the new development and about light rail. He also expressed similar concerns around the Paramount Park and Paramount Open Space, which can be jewels in a very beautiful necklace for Shoreline. Going forward, he urged the Commission and City Council to keep the momentum going. He said he is excited about connecting the 155<sup>th</sup> Corridor to Aurora Avenue

North. This is a strong move that will link development and make the area more walkable and bikeable. Having more development outside of the area would make the light rail stations a greater asset, especially when they are linked to existing corridors.

**Response:**

Comments are noted.

**Christine Southwick**

Voiced concern that taller buildings would change the amount of air flow and sunlight that reaches the Paramount and Twin Ponds Parks. The vegetation in the parks, as well as the vegetation on surrounding residential properties, would be impacted by these changes. She also voiced concern that the proposed changes could alter wind flow and bird patterns. She recommended that the height limit should remain lower for the properties that surround the two parks.

**Response:**

Comments are noted.

**Diana Coleman**

Said she works in Downtown Seattle and is in the City every single day. She purchased a home in Shoreline because it provided an opportunity for her family to be near the City but have some personal space. She spends time every day in her backyard, which backs up to the Paramount Open Space, and she hears birds every single day. She said she would hate to see her neighborhood turned into a concrete jungle.

**Response:**

Comments are noted.

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