

January 15, 2015

Mr. Keith Scully
Shoreline Planning Commission Chair

Re: Comments on the proposed Shoreline 185th Street Station Subarea Plan and Planned Action Ordinance

Dear Chair Scully,

Thank you for the opportunity to comment on the proposed Shoreline 185th Light Rail Station Area Plan and Planned Action Ordinance.

Cascade Bicycle Club (Cascade), on behalf of our 16,000 members, wants to thank the city of Shoreline for its leadership and planning to envision compact, walkable and bikeable communities around the future Sound Transit Light Rail Station. This type of planning will create more transportation choices for your residents and increase access to healthy transportation options along with providing a mix of housing types that are affordable to a wide-range of people.

Sixty percent of people in our region would like to bicycle more often, but don't because of safety concerns. Cascade is working toward helping this "interested, but concerned" category of riders feel more comfortable riding their bicycles, and we need to make sure we are providing options for them to access the 185th Street Station.

We encourage you to prioritize the expansion of the bicycle and pedestrian network to ensure that comfortable, convenient and safe access exists for those walking and riding a bicycle to/from transit, local shops and homes. The creation of safe facilities on Perkin's Way will allow those accessing the station from the north east to have a much more comfortable experience as well.

To make it all work, the Station Area needs minimum densities that support transit. The combination of housing, shops, transit and bicycle and pedestrian access create vibrant, livable communities.

Thank you for your consideration and please do not hesitate to contact me with questions.

Sincerely,

Jeff Aken
Advocacy Director
Cascade Bicycle Club

Improving lives through bicycling

January 15, 2015

Subject: Public Comments on the North 185th Street Station Subarea Plan

Dear Planning Commissioners,

I am requesting that I be considered a party of record with standing regarding the N 185th Street Station Subarea Plan.

REPRESENTATION

I want to thank you for working to consider the input from the citizens of Shoreline. I know it is your charter, but none-the-less, it is something which too easily seems to get lost. I don't know of anyone who is opposed to the transit station. However, I have not yet heard a single person who feels even a little bit okay about what is happening with the planning for the transit station. It seems the total focus is on growth at nearly any cost without any consideration for those of us who are here now; many of us since long before Shoreline was City. Please remember to represent those who have lived here for years, are living here now, and are the reasons why Shoreline is currently a livable city. We want our voices to be heard in regard to how we grow to accommodate the transit station.

BUILDING SCALE

I have recently found myself visiting Lake City Way in the blocks just north of N 125th and trying to envision what N 185th in Shoreline would look and feel like with buildings so tall. Bearing in mind that Lake City Way is a four lane road with parking on either side and a wide median planted with trees in the middle of the road. These few blocks diminish the human scale beyond belief. Even with the planned setbacks, I am troubled when I try to imagine how it will feel to walk down N185th which is only a two lane road, without parking lanes, no median and no median trees. Please do more to consider the human scale if we are to continue to think of Shoreline as continuing to be a city of livable neighborhoods; something the City of Shoreline prides itself in.

20.10.020 It is the purpose of this Code to: . .

- Provide adequate light and air;
- Encourage productive and enjoyable harmony between man and his environment;

REZONE SIZE & PHASING

The size of the rezone area is enormous. While I recognize it might be necessary to consider the vastness of possible expansion, doing so all at once will not accomplish the goal of Transit

Oriented Development (TOD). It would be much better to initially rezone only the MU85 area which immediately encircles the transit station. Only after this area is nearly built out, rezone the concentric circle of MU45 and continue on as needed. This will assure the area nearest the station is developed first with the largest population available to support station use quickly while protecting the integrity of existing neighborhoods for as long as possible, until there is a need to impact them directly. If the entire area is rezoned for immediate development now, it will result in a higgledy-piggledy pattern of out-sized buildings here and there among smaller ones resulting in the maximization of negative effects on existing neighborhoods. Please consider rezoning only the inner-circle of development first, followed by outward expansion only when the need is proven.

SURFACE WATER

I am very concerned that in a city with long standing surface water issues, in an area which includes the headwaters of Thornton Creek, that this plan indicates that after every planned surface water treatment is in place, and assuming they work perfectly as planned, that a 37 percent increase in surface water is acceptable. It is not. By building the densest units to house the greatest numbers per square foot of building footprint the impacts to surface water could be minimized in the short term. However, I feel that if no solution is found to maintain or diminish current surface water below current norms the FEIS is inadequate and the plan should be abandoned.

20.10.020 It is the purpose of this Code to: . .

- Protect the functions and values of ecological systems and natural resources important to the public;
- Promote efforts which will prevent or eliminate damage to the environment and biosphere;

CANOPY AND HABITAT

One thing that would certainly help to mitigate both the livability and the surface water issues is trees. Big, native, diverse stands of evergreen trees on both public and private lands. The City of Shoreline continues to need a serious tree code to protect our assets. It needs to address the quantity and quality of canopy including, total leaf-surface area, and diversity of trees on private lands (typically 85 percent of the canopy). Other cities including Lake Forest Park do this. Shoreline can too. These speak to important issues including rainfall interception, air quality, carbon sequestration, crime prevention and more. These are all elements of the quality of life.

Additionally, the map should include habitat corridors to accommodate wildlife. Did you know there is direct relationship between the size of habitat friendly land and the number of species the land can support? Or that it requires a ten-fold increase in the amount of land to double the number of species? If we want to keep any wildlife in Shoreline at all, we need to have planned habitat corridors that provide continuous routes for wildlife to travel. Now is the time to plan these corridors, or we will find ourselves building wildlife bridges in the future.

20.10.020 It is the purpose of this Code to:

- Protect the functions and values of ecological systems and natural resources important to the public
- Promote efforts which will prevent or eliminate damage to the environment and biosphere;

PUT PARKS ON THE MAPS

While there is mention of the need to provide Parks to accommodate the anticipated population increase, there seem to be no plans as to where they will be. This is a plan for them to not be. Shoreline already has large areas which are short on park space. As things stand today, a very few neighborhoods have the vast majority of park acreage and taxpayer expenditures. A more equitable distribution of park lands must be defined. What are the plans to acquire space? With what money? The acreage per neighborhood should, at the very least, needs to be planned and placed somewhere on the map, as a representation of the distribution of future parks. Without this the Transit FEIS is simply incomplete. The words and pictures need to match.

Additionally, with more people living without any private green space, the ratio of square park footage per person will need to increase. The existing FEIS is incomplete without these calculations and the park distribution represented on the map.

20.10.020 It is the purpose of this Code to: . .

- Facilitate adequate provisions for transportation, utilities, schools, parks, and other public needs;
- Encourage productive and enjoyable harmony between man and his environment;

WHAT ABOUT THE LAST MILE

What is the City doing to address “the last mile”? As you probably know, this is something that Issaquah is struggling with right now. See “The Park And Ride Dilemma: Bus Riders Still Rely On Cars” at <http://kuow.org/post/park-and-ride-dilemma-bus-riders-still-rely-cars> Shoreline has a

chance to learn from their mistakes. What the plans for a Shoreline shuttle bus? A City operated bike-share system?

20.10.020 It is the purpose of this Code to: . .

- Provide regulations and standards that lessen congestion on the streets;

MITIGATIONS

What are the plans for positive mitigations to off-set the negative impact of TOD? Are there plans for replacing the Spartan Center? The pool? The Senior Center? Providing a “destination-type” performance center and free public meeting rooms for community groups to meet and participate in community activities without the city staff hanging around.

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- Facilitate adequate provisions for transportation, utilities, schools, parks, and other public needs

STATION CAPACITY

I have to wonder if the proposed rezone area is built-out as planned and the buildings fully occupied; would it generate greater demand for the station than it could provide. How many trains, and passengers can be added?

Sincerely,

Boni Biery

Subject: Rezones for light rail ...

Auto forwarded by a Rule

I live in the area for one of the “proposed” rezones. I am sure the citizens that live in the 185th area feel the same way.

Much of this is being done very quickly and with a very broad brush. Many of the local citizens who own homes they have lived in for many years feel like the city is a steamroller out of control. This is NOT why Shoreline became a city in the first place, we became a city so that we would not be annexed to Seattle and subject to being steamrolled by the Seattle City Council.

I think the Shoreline City Council needs to be reminded of some of the whys, and neighborhoods and schools, sans developers’ interests only, was a part of the why.

Change happens, I realize this. With light rail change will happen but it should not be as hidden as all this feels to the citizens who inhabit the neighborhoods impacted by the Council's decisions.

There are many sensitive environmental areas especially in the 145th rezone, these areas are also very desirable positives for the neighborhood, lower Paramount Park in particular, but the whole drainage corridor from 8th Ave NE to 12th Ave NE and from 145th to 175th would sustain major trauma and impact by the proposed densities.

There is also a main power transmission corridor along 8th Ave. NE that is not quite compatible with the proposed heights and densities. Little seems to have been done to address the MAJOR impacts the proposed rezone would have on this area.

Many of the citizens in the proposed area have lived there for years and are or have looked forward to retiring in the homes they have owned and many will be on fixed incomes, having worked hard to pay for their homes so that the CAN enjoy them.

Nor has there been any attempt to accommodate those who might like to reside in a single family home. There are still many families who are interested not in density, but in being close to things like good schools, light rail, stores AND live in a single family home such as currently exists.

The City is forgetting its citizens, this is how it feels. This is not how a citizen should feel, this is not how one would hope a council that is supposed to represent the citizens, would act. If the city and the planners can only tell it's citizens "We HAVE to do this" then the impression is that someone besides the citizen is more important to the City. No one "has" to do anything and yes, change happens, but it should not come at the expense of the citizens that elect the officials.

Cathy Aldrich
Shoreline WA

Subject: Comments regarding 185th St FEIS

To whom it may concern:

I am writing to comment on the 185th St FEIS. For the most part I am excited about the future of the neighborhood. I am sure that many of the comments submitted about this project are negative or anxious, but I look forward to the day when I can walk down my street to the station and ride to work, shopping, sports, and more.

But I do have concerns to share, and many of these are based on the fact that my daughter will be turning 14 the year the station opens. I want to make sure that the safety of pedestrians is a

priority within the subarea, and many of the items in the review guide show that there has been a lot of thought put into this subject. Yet the cover of the review guide shows a conceptual drawing of 185th and 8th Ave, an intersection has been left left out of the outlined changes... I feel that this intersection in particular is dangerous and will only become more so with the increased traffic. I ask that this intersection receive more attention. There is also a lot of potential with the entire length of 8th Ave between 175th and 185th, as there is a very wide easement/right-of-way that could be developed into sidewalks and bike paths, creating a pedestrian boulevard that will pull foot and bike traffic off of the more congested 10th Ave, which I understand will be heavy with auto and bus traffic.

I would also ask that the idea of phasing in the zoning changes be disregarded. As a resident of the subarea outside of the Phase 1 boundary, I don't want to be left out of the improvements to streets, utilities, and other infrastructure. I feel that the Phase 1 model only restricts the ability to improve the entire subarea when it really needs it.

Thank you for your time and consideration.

David Hughes

Boni Biery has succinctly captured my sentiments regarding the North 185th Street Station Subarea Plan in a recent document she sent to the planning commission, a copy of which is attached here. Please give her observations and suggestions the additional weight of my concurrence.

Also, will you please honor my request to be a party of record with standing.

Thank you,

Dianne M. Hansen

January 15, 2015

Comments on North 185th Street Station Subarea Plan

To City of Shoreline Planning Commission:

I have happily lived within the Shoreline Community for 23 years. I am not opposed to change, or growth, or trains, or well-planned development. I am, however, very much opposed to the massive rezone area proposed in its current form with such intense density right now. The train

and station are years away, and the city's expectation is that full build out of this enormous rezone area will take many decades. From the City website: The City will set the stage for how the neighborhood may transition over time. Market forces and homeowner decision making about how and when to redevelop or sell properties will determine the pace and degree of transformation.

Evidently all of the single family homeowners currently in the large MUR-85 section won't have decades, rather a mere five years to come to a decision. From the development code: Single-Family detached dwellings are a permitted use in the MUR-85' zone until January 1, 2020. After January 1, 2020, single-family detached dwellings shall become a non-conforming. use subject to the provisions in SMC 20.30 Subchapter 5. Nonconforming Uses. This appears to be a tactic, a disincentive, for the current homeowners who live in the MUR-85 zone to stay in their single-family homes. In other words, they will be forced out.

I believe leaving development planning to market forces is reckless and a recipe for the destruction of well-loved neighborhoods. This is not a plan; it's a gift to developers. It is clear that this plan has nothing to do with benefitting current residents and homeowners. If their interests were being considered the area immediately around the proposed station would be developed first, followed by the larger area predictably and incrementally as needed over time. With this huge area rezoned now, development will be haphazard - quite the opposite of a plan - increasing the likelihood of instability in currently stable neighborhoods, and for blighted areas that don't currently exist.

Parks and open space should also be included in the zoning map, particularly since the need is already established; without park space shown, the map is not complete. Also, if I understand it correctly, park spaces will also be up to developers (not the city) to create with certain projects, yet won't necessarily be a requirement. This makes no sense to me. If we know park space will be needed, then we should set it aside now and show it on the map. That is the only way the Community will be assured we will have adequate parks and open spaces. It seems to me this might be accomplished, at least partially, by simply retaining the current zoning in certain sections, especially in known sensitive areas where building is not feasible.

Again, this is not a plan; and any benefit to those who live in the area is hard to find. I ask that you not rush your decision to send this on to the city council in order to keep the arbitrary schedule that has been set. Please be sure you are carefully considering and representing the interests of those who live in these Shoreline neighborhoods now.

Thank you for serving the community and for considering my comments.

Sincerely,

Jan Stewart

Subject: Rezoning

Dear Mr. Szafran,

I am a long time resident of Shoreline. I have lived in my home for the last 41 years. I raised my children here and now my grand children are being raised here. I am in the 1/4 mile of the station. I have attended many meetings and thought it was wonderful the city wanted our input into the process. At an early meeting I attended we were shown three options, no growth, some growth and most growth. Now all of a sudden it is massive growth. At one of the meetings we sat down with drawings and markers, were asked how would we like to see Shoreline grow and to mark on the drawing what we would like to see. No one, I repeat no one drew anything like what the city is proposing today. This massive rezoning for something we are being told is 100 years down the road does not make sense. Nor does giving concessions to builders at the expense of the tax payers.

I do not understand why you want to mow down a wonderful single family community with trees and put in massive buildings. The city acts like it is taking our input and sharing our vision with theirs but this is not happening. We the citizens have been bypassed on all aspect of this process. We have no say. Most of my neighbors have no clue. One told me he went to city hall and was told no building out side of the station and parking garage will not happen for 20 years. Some think it won't happen at all. So when I read there has been extensive notification of the people living in the area from 10th to Aurora on 185th. I know this is not true. The billboard on the bridge is also misleading.

So I request you reconsider this massive rezoning and think about it some more.

Judy Nordaker

Judy

Subject: 185th St. Station Light Rail Subarea Plan
Auto forwarded by a Rule

Dear Shoreline Planning Commission,

Please find my comments below regarding the 185th Street Station Subarea Plan and Planned Action Ordinance.

Shoreline is a great place to live. Enumerable surveys conducted by the city validate this fact. With the coming of lightrail and transit orientated development (TOD) adjacent to the stations, how do we ensure future surveys will still attest to the great livability of the Shoreline of tomorrow? How do we retain our great schools, parks, trails and make sure our transportation infrastructure keeps up with future demand and allow safe passage for bicyclists and pedestrians? Will we feel as safe in our homes as we do now? How will the landscape look 30 years from now? Will tall conifers still grace the horizon? Will wildlife have corridors to safely pass through the cityscape? The lightrail and associated TOD offers a great opportunity to create not only a variety of housing options for aging baby boomers and urban-oriented Millennials, but in addition ensuring affordable housing is part of the mix. We just need to make sure we retain the assets that make Shoreline a great place to live.

- **Zoning:** I don't have a problem with the new zoning (MUR35, MUR 45 and MUR 85) nor the areas designated for re-zoning. However, the MUR85 becomes problematic when, through the use of developer agreements, what was a maximum of 85 feet high changes to a potential of 140 feet high. Quite a change! As noted in the Review Guide, "this density (MUR85) is unlikely to be supported by current market forces, and it may be some time before this building type would be developed in the subarea". It seems to make more sense to have the zoning at MUR65, with a maximum of 100 feet with a developer agreement. Perhaps this is more likely to be developed. I like the idea of leveraging developer agreements to achieve public space, green space and other community assets. It also seems in the current bustling economy of Seattle and surrounding urban areas that Shoreline offers great potential for development. Don't sell us short. Let's do what we can to make sure developers help pay for the amenities needed to ensure Shoreline remains a great place for current as well as future residents.
- **Bicycle and Pedestrian Transportation network:** The Inter-Urban trail provides a North-South bike connector on the West side of the 185th St Light Rail Station Subarea. Soon an East-West connector will be completed along N. 195th St. Bike lanes and sidewalks along 10th Ave Ne will provide a N-S route on the East side of the Subarea. What is sorely lacking is an East-West corridor on the South end of the Subarea. Even though funding would be prohibitive, a pedestrian-bicycle overpass over I-5 along NE 180th St would be ideal. This would allow a connector trail accessing Cromwell Park and the Interurban trail to the West. To the east, this trail would connect to 10th Ave or continuing East, to North City. Potential would be presented to eventually connect to Perkins Way and the Burke-Gilman trail. As a former year-round bicycle commuter (before I retired last February) I can tell you that bicyclists prefer trails over roads. Building bike lanes along N. 185th, N. 175th, or Meridian Ave, especially with the projected increase in traffic, would not create a very enjoyable ride. Throwing Metro buses into the mix would increase the angst. Intersections would increase the potential for accidents. The safest solution is to completely separate the automobile traffic from

bicycle traffic by creating parallel but separate routes (N. 185th vs N. 180th, Aurora vs Interurban Trail, N. 200th vs N. 195th, 15th Ave NE vs 10th Ave or 8th Ave NE). A great potential for a new pedestrian route (and also bicyclists) could follow the Seattle City Light ROW along 8th Ave NE. This wide street would make a great green street, with park-like landscaping, rain gardens and safe pathway for foot and bike traffic. Another great public pathway could be the creation of a public stairway up the steep incline of NE 185th St as it climbs up to North City from 10th Ave NE. What a fun and interesting public walkway this could be!

- Parks: Per the Review Guide for the FEIS, by 2035 the projected population growth under Alternative 4 would generate demand for one new neighborhood park. At build-out, demand would merit the creation of nine to ten new neighborhood parks. NOW is the time to figure out where the parks should be, research potential sites, and figure out the funding mechanism. Ensure that Rotary Park is preserved and enhance, and look at other potential pocket park sites. We will need additional areas for children to play, public gathering places, and safe connector routes. More apartment dwellers will place demand on more community garden space. One great potential spot could be the Seattle City Light ROW that runs between 10th Ave NE and NE 185th St. However, perhaps growing vegies under power lines would be problematic. Instead, maybe a pea patch could be created along 8th Ave NE. When I was in Seattle recently, I saw a multi-story apartment building that was landscaped with a resident pea-patch. What a great idea! A huge concern for me is the loss of trees that will incur with the building of the light rail along I-5, as well as the station site. This doesn't even begin to fathom the loss of trees as land is redeveloped at a higher density. Even though there is written in the development code tree preservation language, there will be huge net loss of trees. Even if the city planted a tree for every one lost, there is only so much public land. There is a great potential for the city to partner with existing non-profits in the city, such as Diggin' Shoreline and the Kruckeberg Botanic Garden Foundation, to educate residents on the importance of gardening with Native Plants, on creating Backyard Wildlife Habitats, and the importance of trees as our green infrastructure-filtering our groundwater, offering us shade in the summer, providing oxygen and absorbing carbon, mitigating air and noise pollution. If 10% of our private landscapes were converted to ones that reflected sustainable gardening practices such as using native vegetation, eliminating use of pesticides and excessive watering, while creating habitat for pollinators, birds and other wildlife..we would mitigate the loss of habitat due to the construction of the lightrail and the associated TOD.

We all have a responsibility to make sure the Shoreline of tomorrow is every bit as great as the Shoreline of today.

Regards,

Barbara Guthrie

Hello,

My name is Kerri Bradford. I want to let you know my perspective on the 185th st station and the proposed rezoning. First, a little background: My grandparents moved to Shoreline in the 1940's. My parents and extended family all lived in Shoreline and went to Shoreline Public Schools. My brother and I lived in Shoreline with our parents and attended Shoreline Public Schools. My husband and I met at North City Elementary, a Shoreline Public School. We live in Shoreline, and our children are fourth generation Shoreline residents and they attend Shoreline Public Schools. Needless to say, we love Shoreline and have watched it grow over the years. In talking with neighbors who have chosen to live in Shoreline, the appeal is the proximity to Seattle without BEING Seattle. I think most of us Shoreline residents are not here SIMPLY because it's less expensive (and it's debatable if it is less expensive.) Most of us are here for the community aspect and we love the SUBURBAN atmosphere. I fear the "PREFERRED" rezoning map will affect the essence of Shoreline. We are not competing with Seattle. We don't want to be like Seattle. We are our own city with our own communities. We want to be like Shoreline. What's so terrible about that?

I can go into all the ways that for practical purposes rezoning half of Shoreline is a horrible idea from the prospective of the environment, crime, and overpopulation, etc. These are things I'm sure others will cover. Frankly, I can't remember if I voted for Light Rail, but I probably did. Light Rail is a good idea. I'm sure when I voted for it, if I did, I didn't imagine in my wildest dreams that I would be voting in A COMPLETE OVERHAUL OF MY TOWN. If the "PREFERRED" draft of rezoning is voted in, SHORELINE WILL CEASE TO BE THE TOWN MY PARENTS GREW UP IN, I GREW UP IN, AND MY CHILDREN ARE GROWING UP IN. It will be Seattle junior. None of us want that.

In short, I want Light Rail. Shoreline residents supportive of that. Very few of us want to have Shoreline change in such a drastic way EVER, not now, not twenty years from now, etc. So, Planning Commission and Shoreline City Council, PLEASE, give us Light Rail, that's what we asked for in 1996. Please retain the "feel" of Shoreline and choose to rezone only the areas near the Light Rail station.

The "Preferred" rezoning map draft is not preferred at all by Shoreline's residents.

Thank you for reading my statement.

Kerri Bradford

Subject: RE: Comments for 1/15/15 planning commission meeting

Auto forwarded by a Rule

Please include my comments with the other comments for the EIS for the 185th street station. I would like to be a party of record. I have also attached it as a word document. The formatting is better that way. Please let me know if you need anything else. Thank you

My husband and I bought a home in Shoreline a little over a year ago. It took 8 long months to find the perfect place to raise a family. This was much longer than we had planned which resulted in our son being born while we were still living in a one bedroom condo in Seattle. His nursery was our dining room. Trust me, living in a three bedroom single family home is much nicer than having a family in a small unit albeit in a high density building with surrounding amenities. I am sure many other millennials will come to a similar conclusion once they have recovered from the tough economy and can financially start thinking about having a family too. Thank goodness for Shoreline's current affordable housing that enabled us to buy.

Anyway, when we found the house I knew light rail would be going in approximately 0.7 miles away. I tried to do my research and discovered there were 3 options being considered, "No change", "some growth" and "most growth". These options were the ones studied in the DEIS. I figured these alternatives were zoning changes I could live with so we bought the house. Honestly, I figured that like most things the two extremes would be studied but the final plan would be similar to the moderate "some growth" alternative.

Imagine my surprise when somehow the preferred alternative chosen was nothing like the 3 options originally presented and the density allowed was probably quadrupled, if not more, in the station subarea. Additionally, the residential only zoning was changed to mixed use residential. Where are business customers going to park? I can't imagine 185th street will somehow become wide enough for 3-4 traffic lanes, 7 foot sidewalks, bike lanes and street parking but someone apparently thinks it will be big enough so commercial is allowed everywhere the zoning changes are occurring, including converted homes with parking for only one car.

What confuses me most is that there is very little supporting documentation on why this was done. The public comments in places like the visioning workshop, DEIS, council and planning commission meetings, etc. do not support this kind of up zoning, except maybe a very small minority.

I have tried to read everything I could and listen to the meetings regarding the 185th Street light rail station. I have read several times in the available materials that since one person suggested something an area was upzoned. I have never seen the opposite happen for the 185th Street Station Subarea, where 1 person didn't like something so the zoning was decreased (and let's face it more than 1 person has shown opposition). Incidentally, I think I have met this one person. She owns a decent amount of land and is concerned about selling for top dollar and not the betterment of Shoreline. I met her when I went to learn more at the 185th St Station's Citizen committee meeting this month. I was one of four citizens and two planners. What does that say when only four people show up to such an important meeting? January is the month that the planning commission is making their final decision. To me it means people don't care, don't know or don't feel their voice makes a difference. Sure seems like something isn't working in this process of getting the public informed and involved.

Could someone please explain why the preferred alternative was chosen to be studied for the EIS instead of one of the alternatives proposed and studied from the DEIS?

Also, I don't understand why zoning is being considered over half mile away from the station since most, if not all, transit experts say that is where development should be concentrated for transit orientated development. I have seen where the idea was probably formed though, at the visioning workshop a "signature boulevard" was discussed. I would encourage you to reconsider changing the zoning up to a mile away from the station. It seems counterproductive to try and establish transit orientated development farther than people will walk. Phased zoning should be concentrated around the station then slowly expanded when the need arises. I feel the phased zoning should be much more concentrated than the current proposal and focus on the critical half mile area away from the station.

Another suggestion I would like to make is please review the market assessment done regarding the 185th station subarea. Some memorable excerpts were,

“Retail should be limited to a small amount of convenience oriented retail serving residents and transit riders and located at the transit station. The station area lacks existing retail uses, with the nearest neighborhood retail area located just over one-half mile away on 15th Avenue NE, and the City’s primary commercial corridor on Aurora Avenue North a mile away.

However, the station area is too far from either of these areas, or Interstate-5 access, to benefit from existing retail activity, making it unlikely that a significant number of retailers could be attracted.

Convenience-oriented retail (e.g. coffee shop/café, sundries, personal services, etc.) located at the station, or within a direct sight line between the station and any parking structure, would maximize access to transit riders and immediate area residents and have the greatest potential.”

and

“New transit stations often spur new development in their immediate vicinities when there is market support for new types of denser, mixed-use transit-oriented development, as well as supporting city actions such as rezoning to accommodate market demand. These effects are generally limited to a ½-mile radius around stations, or the “station area”, that represents the outer limit of how far most persons are willing to walk between a residence and a station.”

Does that sound like a good description of the preferred alternative?

Why can’t Shoreline become an area similar to Columbia City with row homes, town homes and cottage homes and maybe a few larger apartment or condo buildings next to the station? That seems much more in line with the single family neighborhood that already exists.

Finally, I am concerned that the station area rezonings 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 185th and 145th. 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?

When changing the zoning I support a moderate concentrated approach around the ½ mile radius from the station. More like the “some growth” scenario from the DEIS.

Thank you.

Sarah Jaynes

Concerned Citizen and Registered Voter of the City of Shoreline



January 14, 2015

Mr. Keith Scully
Shoreline Planning Commissioner Chair
Planning Commission
Shoreline City Hall
17500 Midvale Avenue N
Shoreline, WA 98133

Re: Comments on the proposed Shoreline 185th Street Station Subarea Plan and Planned Action Ordinance

Dear Chair Scully,

Thank you for the opportunity to comment on the proposed Shoreline 185th Light Rail Station Area Plan and Planned Action Ordinance. Futurewise works throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We have members throughout Washington State including many members in the City of Shoreline.

We very much appreciate the hard work by the City of Shoreline staff, the City's Planning Commission, City Council and residents to create a transformative plan for the 185th Station Area. This plan is a bold step toward a new vision for the neighborhood which will have long-term benefits for the neighborhood, the City of Shoreline and the entire Puget Sound region.

We are very pleased to see Shoreline propose transit-supportive densities within the station area. Moving to a form-based code with allowed heights ranging from 35 to 85 feet will enable the City of Shoreline to accommodate housing and employment growth in the City while minimizing negative impacts on existing neighborhoods and the natural environment. We urge the City to adopt the proposed zoning and land use classifications and boundaries.

We fully support the strong affordable housing program outlined in the proposed Development Regulations. By requiring housing affordable to a mix of households and incomes, the City of Shoreline is preserving housing affordability, an outcome repeatedly requested by Shoreline residents, and ensuring that the City and region grow equitably and fairly. Additionally, by providing affordable housing close to transit, the City is enabling low-income families to not only reduce their housing costs, but also transportation costs, two of the largest housing costs for all families significantly increasing the financial stability of low-income families and their access to opportunity.

Below are a few recommendations that we feel will improve the Shoreline 185th Station Area Plan and hope that you will consider:

Single Family Detached Land Uses – The transition from single family land uses to transit-supportive multifamily and commercial uses will likely occur over many decades. During this time, discouraging the construction of new detached single family homes, particularly in those areas with closest proximity to the station should be the policy of the City. The current proposal addresses this in two ways: first, by eliminating single family as a permitted land use in MUR-85 zones after 2020 and, second, by requiring that new single family units in MUR-35 and MUR-45 adhere to the existing, lower-density R-6 zoning classification.

We urge the City to consider additional measures to prohibit the construction of new single-family detached units within the station area where multi-family units are planned and zoned. We recommend removing single family detached as a permitted use in MUR-35 and MUR-45 zones, thus, creating new investment that is better in accordance with the City's vision of the area as set forth in this plan. Furthermore, we feel that the existing municipal code relating to non-conforming uses gives existing owners of single family detached dwellings the ability to repair and even expand (up to 10%) existing homes with conditional permits.

Minimum Density – In addition to limiting the construction of new single family homes in the station area, we also encourage the City to include minimum density requirements in the MUR-85 zone. For example, this could include a provision which requires new development to achieve a minimum FAR of 3 within the MUR-85 zone.

Housing Affordability – We support including owner-occupied housing in the station area's affordability program. However, as stated above, we believe single family housing is inconsistent with the long-term vision of the area. Instead, affordable home-ownership opportunities can be achieved in different product types including townhomes, multiplexes and condominiums. Placing long-term affordability requirements on single family homes may impede the ability for future property assemblage and redevelopment into higher density, transit-supportive housing.

Again, thank you for the time and energy that you have spent working to ensure the Shoreline 185th neighborhood can fulfill the full potential of transit-oriented communities. The proposed plan will support the transformation of the station area to a vibrant mixed-use neighborhood that is pedestrian-friendly, mixed-income and environmentally responsible. We urge you to recommend its approval and adoption to City Council and appreciate your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Amy E. Gore".

Amy Gore
Sustainable Communities Director



**HOUSING
DEVELOPMENT**
consortium

January 15, 2015

Shoreline Planning Commission
Shoreline City Hall
17500 Midvale Avenue North
Shoreline, WA 98133

RE: Comments on the proposed Shoreline 185th Street Station Subarea Plan and
Planned Action Ordinance

Dear Planning Commissioners,

On behalf of the Housing Development Consortium of Seattle-King County (HDC),
thank you for this opportunity to comment on the proposed affordable housing
provisions in your 185th Street Subarea Plan.

HDC is a nonprofit membership organization which represents more than 100
private businesses, nonprofit organizations, and public partners who are working
to develop affordable housing and provide housing-related services in King
County. HDC's members are dedicated to the vision that *all people should be
able to live in a safe, healthy, and affordable home in a community of
opportunity*. In other words, we believe all people, regardless of income, deserve
the opportunity to thrive in a safe neighborhood with good jobs, quality schools,
and strong access to transit.

We applaud Shoreline for its work toward achieving this vision. The City's recent
exemption of affordable housing from transportation impact fees, for instance,
will make it easier to provide safe, healthy, affordable homes in Shoreline. We also
thank the City for its support of the Ronald Commons project and for its strong
partnership with the affordable housing community.

With the development of the light rail station subarea plans, the City has before it
an ideal opportunity to explore what other strategies are necessary to create an
affordable community for all of Shoreline's residents. This is the City's chance to
honor and implement the commitments it has made in the Comprehensive Plan
and Housing Strategy Plan. By maximizing tools that leverage the power of the
private market to create affordable homes, Shoreline can help ensure its growth
benefits people across the income spectrum.

HDC's Affordable Housing Members:
Low-income Housing Organizations
Community Development
Corporations
Special Needs Housing
Organizations
Public Housing Authorities
Community Action Agencies
Workforce Housing Organizations
Public Development Authorities
Government Agencies and
Commissions
Architects and Designers
Development Specialists
Certified Public Accountants
Regional Funders and Lenders
National Funders and Lenders
Community Investment Specialists
Property Managers
Law Firms
Contractors

Affording Opportunity

1402 Third Avenue, Suite 1230 Seattle, Washington 98101

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Light rail will increase the demand for housing in Shoreline, and without proper planning, could make housing more difficult for low income people to afford. **In order to retain affordability and prevent displacement in the station areas, we urge the City to implement a strong incentive zoning program that requires development to meaningfully contribute to affordability.** To that end, as you finalize development regulations, we would like to share the below technical comments with you to help guide your work.

❖ **Creating a Mandatory Program**

HDC strongly supports a station area plan that requires development to contribute to solving affordable housing needs. We urge the Planning Commission to approve the proposal to create a mandatory program in the MUR 85+, MUR 85, and MUR 45 zones. HDC would also support extending this mandatory requirement to the MUR 35 zone.

❖ **Set-Aside & Income Targeting**

When establishing incentive zoning programs, cities face a tradeoff between serving lower-income households and the number of households a program is able to assist. The higher the number of homes required to be set aside as affordable housing, the less affordable those units can be. This balance helps ensure a program is not too onerous for developers.

Staff has suggested allowing developers to make this choice for themselves in the MUR 85+ zone by allowing them to develop homes affordable at either 60% or 50% Area Median Income. In order to be consistent throughout the zones, HDC suggests creating parallel choices in the MUR 85, MUR 45, and MUR 35 zones. This will allow the City to achieve a deeper level of affordability while providing flexibility for developers. We also think the Commission should consider softening the requirement for two bedroom homes in the 85+ zone to maintain consistency with the other zones. HDC suggests the following affordability levels and set-asides:

<i>Bedrooms</i>	MUR 85+	MUR 85	MUR 45	MUR 35
<i>Studio, 1</i>	20% of homes at 60% AMI or 10% of homes at 50% AMI	20% of homes at 70% AMI or 10% of homes at 60% AMI	20% of homes at 70% AMI or 10% of homes at 60% AMI	20% of homes at 70% AMI or 10% of homes at 60% AMI
<i>2+</i>	20% of homes at 70% AMI or 10% of homes at 60% AMI	20% of homes at 80% AMI or 10% of homes at 70% AMI	20% of homes at 80% AMI or 10% of homes at 70% AMI	20% of homes at 80% AMI or 10% of homes at 70% AMI

**HDC modifications in blue*

We have modeled these suggestions to be consistent with the affordability ratios set up by staff in the MUR 85+ zone.

Based on our work with the City in the past, we understand Council has an interest in creating affordable housing for lower income households—those earning less than 60% AMI. Many developers in Shoreline may elect the option to pay a fee in-lieu of building affordable homes on-site. This money, deposited into the City's Housing Trust Fund, will be a tool to serve those

households making between 0 and 60% of Area Median Income, or approximately \$52,920 for a family of four.

❖ **Catalyst Program & TDR**

HDC supports the City's efforts to preserve open space and fund infrastructure needs in the station area through a TDR program. However, we encourage the City to balance these needs with the need for affordable housing in the area and proceed with caution in exempting any homes from the affordability requirement.

❖ **Homeownership**

HDC recognizes that the City is still trying to understand how homeownership could be supported through the incentive zoning program. We encourage you to take the necessary time to adequately explore and implement regulations for an affordability requirement for homeownership. However, we believe this should not be a barrier to including homeownership in the station area plan. Affordable homeownership regulations are especially important in the MUR-45 and MUR-35 zones where there will be townhome and multiplex development. The City should ensure that these projects are eligible to pay a fee-in-lieu which may allow the City to more quickly implement a homeownership program.

❖ **Density**

Shoreline's station areas will be rich with opportunity—transit, services, jobs, and other amenities that are important for creating thriving communities. In order to ensure that the large public investment made in the station area benefits as many of Shoreline's residents as possible, HDC supports tools that promote density in the station area. Limiting density in the station area may reduce opportunities for affordable housing.

It is critical that those most in need of access to transit are able to live in the station area. By planning for affordability and density in tandem within the station area, the City will support families of limited incomes, increase ridership of light rail, and create a strong customer base for businesses in the area.

We encourage the City to adopt and implement strong affordable housing regulations in line with the above recommendations as part of the station area plan. We greatly appreciate the intense thought and hard work that has gone into creating this plan. We thank the City of Shoreline staff, the City's Planning Commission, and Shoreline residents for their engagement in and dedication to this process. **This plan represents a strong and equitable vision for a thriving Shoreline.**

We at HDC look forward to working with the Commission, staff, and Council as this process moves forward and are happy to be contacted with any questions.

Thank you for your consideration, and for all you are doing to help create, safe, healthy, affordable homes in Shoreline.

Kind Regards,



Kayla Schott-Bresler
Policy Manager



Kelly Rider
Policy Director



c/o Janet Way
940 NE 147th St
Shoreline, WA 98155

January 15, 2015

Shoreline Planning Commission
c/o Steve Szafran
17500 Midvale Ave N
Shoreline, WA 98155

Subject: Comment for SEPA on FEIS and Subarea Planned Action Ordinance for 185th Light Rail Station Rezone

Dear Planning Commissioners and Mr Szafran:

Thank you for the opportunity to comment on the SEPA for the Planned Action Ordinance and the FEIS for the proposed 185th St Station Area. Please make the Shoreline Preservation Society a party of record status with legal standing in this matter.

The Shoreline Preservation Society is a grassroots, WA non-profit organization that works to preserve the environment and heritage of the Shoreline area through education and outreach, and advocates for good public policies to attain those goals. It has a board made up of individuals who are residents of Shoreline and nearby communities.

We incorporate by reference all materials and comments submitted to date on this Rezone and EIS and any materials produced by staff for Council or Planning Commission, which could be related. Included in these records should be all photos, maps, PowerPoint presentations, videos, meeting records and public comments received in writing or oral testimony. Also, all Sound Transit documents and FEIS are also incorporated by reference.

We believe there is a probable likelihood of significant adverse and severe impacts to our environment if the proposed project is approved, both in Shoreline and to surrounding communities. The analysis in the EIS is underestimating the impacts and the information provide to the public is incomplete and inadequate.

Flawed Process

The proposed rezone and legislative action is unnecessarily rushed and confusing to this community and should be delayed. There have been so many processes with the two Rezones running concurrently, that the public is necessarily very confused about what is

going on. The Rezones are proposed to provide density for a project that will not be completed for at least 10 years and the changes in density are projected into the future for 125 years. No one alive today has any realistic idea of what our area will be like in 125 years, or what technologies will become dominant by then. Therefore it is a folly to base this planning on projections out that far.

Even with the stated “public processes” thousands of residents have not been fully or adequately informed of what is proposed, or what their rights are. The process is needlessly confusing and difficult for citizens to access. City websites are confusing, even to experienced activists.

And just today we have found out there is a “council rule” has prohibited the public from submitting power point presentations to the Planning Commission Hearings. It is outrageous that the staff can use power points to tell their story, but the public at a “PUBLIC HEARING” is prohibited from submitting a power point to illustrate important concerns. This is wrong and very undemocratic. We object strenuously to this rule.

The Shoreline Comprehensive plan states (pg 7) in CP2:

“Consider the interests of the entire community, and the goals and policies of this Plan before making planning decisions. Proponents of change in planning guidelines should demonstrate that the proposed change responds to the interests and changing needs of the entire city, balanced with the interests of the neighborhoods most directly impacted by the project.”

Clearly this massive plan does not comply with this goal. Neither the “entire city” nor the “neighborhoods most affected” interests are respected here, with the massive impacts anticipated.

• Height, Bulk and Scale

Shoreline’s North City, Meridian Park, Echo Lake and surrounding neighborhoods are almost entirely “single-family” neighborhoods. The proposed Light Rail Station and massive rezones would bring unprecedented and unwelcome changes as planned in the Preferred Alternative studied in the FEIS and Planned Action Ordinance.

The City’s proposed Planned Action Ordinance is massive and a huge overreach, which is putting our entire community at risk. The proposed Preferred Alternative with its options to go even bigger than 85’ with 140’ Heights in a General Development Agreement, is an overwhelming height that would enshadow and block sunlight and tower over the existing neighborhoods. This would not “blend well with established neighborhood character” as called for in Vision 2029 of the Shoreline Comprehensive Plan (pg.3). Nor would this be in compliance with the “city’s natural beautiful setting with abundant trees” (pg 3 Vision 2029). The scale called for of 85 – 140’ is not in

keeping with the “*healthy community*” called for in the vision and displaces thousands residents who now live in existing affordable dwellings.

The Shoreline Comprehensive Plan’s Framework Goal FG10 states (pg. 5):
“*Respect Neighborhood Character and the community in decisions that affect them.*”

And on Framework Goal FG9: “*....development that is compatible with the surrounding area.*”

And on Framework Goal FG2: “*Provide high quality public services, utilities and infrastructure that accommodate anticipate levels of growth, protect public health and safety, and enhance the quality of life.*”

And on Framework Goal FG7: “*Conserve and protect our environment and natural resources, and encourage restoration....*”

And on Framework Goal FG4: “*Provide a variety of gathering places, parks and recreational opportunities for all ages and expand them to be consistent with population changes.*” (Yet this Proposed Alternative only calls for one new park in this Rezone in the next 35 years and the massive upzoning would displace existing recreational areas at Shoreline Center.)

It seems absurd to us that there is a 65’ height limit on Aurora Ave where the commercial district is and where density should be concentrated, and yet you are considering imposing 85’- 140’ height in a residential neighborhood. This is unreasonable and should be scaled down extensively.

This proposed alternative fails on meeting these goals on its face.

• Surface Water Impacts

The plan states an estimated 37% increase in Surface Water runoff in the FEIS. This is completely unacceptable and is not in compliance with the City’s responsibilities for LID (Low Impact Development) standards in our Stormwater Code. The two watersheds most effected would be Thornton Creek and McAleer Creek, both “salmon-bearing streams” which are already over-burdened by stormwater impacts. These increases in stormwater and flooding from more frequent heavy rainstorms anticipated with Climate Change, would not be attenuated by traditional technology. The “regional stormwater” systems called for in the FEIS are non-existing and the increased impervious surfaces would quickly overwhelm the existing drainage systems.

The North City/Meridian Park/Echo Lake neighborhoods were historically laced with wetlands. Many of these areas are buried and there are no plans in the Preferred Alternative to activate these natural systems. Loss of tree canopy, which would occur from the scale of development and density, will also further stress these stormwater impacts and remove one of the most desired elements of our community character. The

original tree canopy included huge stands of Fir, Pine and Cedar, which would naturally attenuate the rains. Wetland soils, which still underlie the area, should be reactivated to absorb the runoff. These are Critical Areas and must be protected. Yet the increased impervious surfaces will overwhelm and destroy this natural system. There is not adequate funding in our budgets to mitigate the increased impervious surfaces with natural drainage systems. How will these proposed plans accommodate this increased runoff? How will we pay for it?

Our current code calls for the following:

“20.10.020 It is the purpose of this Code to: . .

☒ *Protect the functions and values of ecological systems and natural resources important to the public;*

☒ *Promote efforts, which will prevent or eliminate damage to the environment and biosphere; “*

The Preferred Alternative is not going to meet this requirement, and therefore is not tenable and is unacceptable.

• Overwhelming Traffic Impacts

The proposed alternative does not provide adequate resources or plans to accommodate expected traffic increases or parking infrastructures. The huge expense of retrofitting intersections and roads to meet the demand of this plan will overwhelm our already overworked staff and budgets.

There is little assurance that existing transit infrastructure could provide the cross-town access needed to replace the auto traffic so often pointed to in the proposals. There is little to provide alternatives and the bike/pedestrian needs to replace the cars will also cost a great deal, including access to the transit center across the freeway. The sources of funding are vaguely referenced as coming from “fees” charged to existing and new residents in the non-existent high-rise communities.

“Community Renewal Areas” concept that could be imposed by Sound Transit is a very dangerous concept, which could label our existing healthy neighborhoods as “blighted” as developers buy up tracts of land and allow rentals to proliferate and degrade. Then large sections could be acquired by “eminent domain” as described in Sound Transit policies. The “Market Assessment” document calls for such “Community Renewal Areas” as a concept to encourage TOD (Transit Oriented Development).

http://www.atg.wa.gov/uploadedFiles/Home/News/Press_Releases/2010/CR L.pdf

“To the extent the City is able or willing to undertake land assembly, it could increase developer interest in the area. Strategies that the City could consider to enhance development potential and facilitate site assembly could include creation of a Community Renewal Area, if the required blight standard can be met. Minimum or contingent zoning that only provides density for infill TOD-type development once a certain parcel size has

been achieved (e.g. one acre or more) could enhance interested neighbors in working with each other to facilitate site assembly.”

Shoreline citizens overwhelmingly do not support use of “Eminent Domain” to achieve growth and density goals for Transit Station Area rezones. And City planners have repeatedly claimed they will not do this, however it is already happening and called for in the Sound Transit EIS.

• Inadequate Open Space

Shoreline residents care about their parks and move here specifically to partake in their beauty and recreational assets.

The FEIS calls for only “one new park” in the first 35 years of buildout. This is completely inadequate, because Shoreline is already served by an inadequate amount of Open Space for the existing residents. And many parks are under developed or overgrown with invasive weeds. There are many existing parks that do not have Master Plans and have unmet maintenance needs.

The FEIS Review guide states on pg RG-27:

By 2035:

Population increase of 2,916 to 5,399 people would generate demand for one new neighborhood park

Shoreline residents love their parks and deserve a much better open space plan. The City should be purchasing these open space parcels NOW, when property values are lower. The FEIS guide estimates at full build out there should be ten new parks. The City’s budget must provide for this property now for public parks and not wait for developers to decide where they should be. A public process should decide this.

In addition, many of these open spaces will also be needed to provide stormwater infrastructure. The property should be acquired NOW to ensure these parcels are available to attenuate surface water flows and reduce impacts to our creeks.

The need for these new parks and open spaces is a requirement of the Growth Management Act. It should be a matter that should be brought before the Parks Board as a matter of course and have a public process its own, in order to entirely meet this GMA requirement. Why isn’t the Open Space requirement made a highlight of this proposal?

What will become of the recreational space that citizens enjoy at Shoreline Center? How will that be replaced if the School District sells or leases out its property for a large development that displaces that park/recreational open space? These questions must be answered in a thoughtful manner.

Shoreline should be all about public process and inclusion, instead of a top down process, which limits participation and imposes huge development on the community against its will.

• Impacts on Schools and Human Services

Shoreline is well known for its excellent schools and for providing a caring environment for its residents. But the preferred alternative does not provide adequate resources or means to promote new school or social services to meet the needs of expected new residents and their children.

• Impacts to Infrastructure and Utilities

In order to implement the “full build-out” called for in this plan the infrastructure for adequate water, wastewater and all other utilities, would be massive and the costs to ratepayers would also be overwhelming. Impacts to the City budget, which as Martin Luther King said should be “moral documents” and provide services to the existing and new residents would be massive. According to your own FEIS “review” booklet, the impacts to our utilities is huge and unsustainable for our budget planning. Ratepayers would be expected to pay for these needs. Instead developers should be expected to pay with Impact Fees and not be given tax breaks with Affordable Housing deals.

The City’s own FEIS Review document makes some pretty shocking estimates of impacts on utilities for the Preferred Alternative 4:

The FEIS Review Guide states regarding utilities on pg.RG-35:

“Consider the need for potential increases in fees for services to address growth “

The FEIS review guide states regarding Surface water utility impacts pg RG 31 states:

“37% increase in surface water/303.10 cfs “

The FEIS review guide states regarding Electricity utility impacts pg RG 31 states:

“699% increase in demand for electricity; under grounding “

The FEIS review guide states regarding Wastewater utility impacts pg RG 31 states:

“661% increase in demand for service compared to current service level “

The FEIS review guide states regarding Water utility impacts pg RG 31 states:

“5,120,637 total gallons per day Compared to 669,180 current usage “

These impacts to our infrastructure are completely unacceptable and unsustainable. A reasonable person might question how this impact will be reducing carbon impacts, climate change or clearly how on earth the humble current or future

residents of Shoreline, seeking “affordable housing” will possibly afford to support these upgrades to infrastructure?

• Impacts to Housing Affordability

People move to Shoreline because of its large supply of modest single-family homes, which are considered “affordable” in comparison with Seattle and other larger cities in the region. And yet this Preferred Alternative will necessarily destroy much of the supply of existing single-family homes. Policies, which attack the character and heart of our community, will backfire and do not meet the expectations of citizens who moved here specifically for the single-family homes that serve their middle class communities.

Affordable Housing requirements should be met by developers, and not by tax-breaks that let them off the hook for other responsibilities such as infrastructure and human service needs.

We question how the “affordable low-income housing” will accommodate families with small children, especially when open space and recreation areas are lost at Shoreline Center?

There are many details that are still unclear. For instance, can a homeowner rebuild or expand his home within one of the 85, 55, 45, or 35 ft zones? And what is a “live/work” space? What if a homeowner wants to convert part of his home to a restaurant? Could they serve alcohol there? What about uses within a commercial space in one of the high-rises? What about parking for the affordable housing spaces? Can you make a rule that an apartment building owner should not force low income residents to pay extra for parking, which would limit street parking in the neighborhoods, which is a flashpoint for neighborhoods?

The Shoreline Preservation Society rejects the proposed Subarea Plan because of the massive negative impact to our environment and community values. The Preferred Alternative fails to meet the goals and policies of our Comprehensive Plan and we strongly urge the Planning Commission to reject this proposal and send it back to staff to further review.

- Negative impacts from Traffic Congestion
- Negative Impacts to existing communities and displacement of residents
- Negative impacts due to uncertain property valuations and uncertainty about future development
- Negative impacts to residents’ due to likely increases in taxes and fees on existing residents.

- Negative impacts to the City's Budgets

- Negative impacts from Stormwater Runoff

The FEIS states quite clearly that an anticipated 37% increase in surface water runoff will result from the Preferred Alternative at full buildout. This is completely unacceptable and violates our Environmental Sustainability Plan.

- Negative Impacts to Neighborhood Character

- Negative Impacts to Public Safety

- Negative Impacts from inadequate of Open Space

- Negative Impacts to Wildlife Habitat

Parks and open space and tree canopy must be preserved, enhanced and increased, not lessened by this proposal. This will ensure that urban wildlife can survive. We have bonafide salmon.

- Negative impacts from construction

- Negative impacts from air pollution and additional carbon pollution from loss of tree canopy, disposal of torn down homes and additional concrete used in construction of Light Rail Stations

- Negative Impacts to Schools and Human Services

- Negative impacts on Historic Elements of the community

There are many historic buildings in the proposed rezone area and there are no plans to document or protect them in this proposal.

- Negative Impacts from likely blight that will result from an overly ambitious proposal that will end up displacing existing residents and leave vacant buildings and lots in our community perhaps for decades.

Shoreline Preservation Society rejects the Subarea and urges the Planning Commission to do the same and send this plan back to the drawing board so that it is reduced in scale. This plan is twice as big as it needs to be to meet the expectations of this community and will impose enormous hardships on existing residents.

We urge the Planning Commission to take its time in making these important decisions. Ask questions and delay making a decision if more information is required. It is more important to get this right and to make a decision that the community truly supports than to rush into one because of an artificial deadline imposed by a timeclock.

Please make a thoughtful decision. We believe this proposal is still not fully formed or explained properly and should be remanded back to staff for more work.

Respectfully Submitted,

Janet Way, President
Shoreline Preservation Society

Mayor
Mary Jane Goss

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Councilmembers
Tom French
Jeff R. Johnson
Mark Phillips
E. John Resha III
Catherine Stanford
Hilda Thompson
John A. E. Wright

January 14, 2015

Shoreline Planning Commission
City of Shoreline
17500 Midvale Avenue N
Shoreline, WA 98133

Re: Comments on 185th Street Light Rail Station Subarea Plan

Dear Commissioners,

On behalf of the City of Lake Forest Park, I want to let you know that we value the good working relationship between our two cities and that we appreciate the opportunity to have the following concerns considered and added to the record during your public hearing on the 185th Street Light Rail Station Subarea Plan.

Cumulative Traffic Impacts: The City of Lake Forest Park shares a long common border with the City of Shoreline. There are a number of LFP streets that connect drivers on SR 522 with the proposed locations of the 145th Street and 185th Street Light Rail Stations. With the beginning of tolling on SR 520, traffic counts on SR 522 increased by approximately 11%. During the morning commute, traffic is frequently stop-and-go from Kenmore all the way into to 145th. We are concerned that once the stations at 145th and 185th are in service, drivers will try to avoid SR 522 and SR 104 congestion by turning onto LFP streets to get to one of these stations. While we understand how the two subarea plans ended up moving through the review process independently, one of the fundamental purposes of planning under the GMA is to look at the cumulative impacts of land use actions.

While it may also be tempting to say that the responsibility of looking at cumulative impacts of the northern extension of the light rail system lies with regional and state transportation agencies, it is the City of Shoreline that is empowered to determine land use around the stations and to implement multi-modal system improvements within its boundaries. These decisions will have impacts on the surrounding communities including LFP.

- What areas should expect to see increased cut-through traffic associated with this station? What will the increase be and what measures will be undertaken to address the impacts of cut-through traffic moving through neighborhoods between the station and SR 522?

- Is there a need to enhance East-to-West bus transit, pedestrian and bike facilities and park-and-rides to address the traffic impacts to LFP and Shoreline collector and residential streets between the station and SR 522?

Noise and Air Quality Impacts: Noise and air quality impacts will increase if commuters' only option is to drive through LFP and Shoreline streets to get the light rail station.

Water Quality and Habitat Impacts: The City of Lake Forest Park and its citizens have worked for many years to protect and improve the water quality in our two fish-bearing streams. Spawning Chinook, Sockeye and Coho are annually documented in McAleer Creek. Coho have also been observed in Lyon Creek. Cutthroat trout and other species inhabit both streams. While no threatened or endangered species habitat may exist within 185th Street Light Rail Station Subarea, the surface water runoff from the area will most certainly pass through the habitat of threatened species as it moves downstream into our creeks and, subsequently, into Lake Washington. Does the subarea plan adequately address potential surface water impacts and measures to preserve and enhance these stream habitats including controlling rates of flow and reducing water-borne pollutants?

We look forward to working with you on the continuing review of the 145th and 185th Street Light Rail Station Subarea Plans.

Sincerely,



Stephen Bennett, AICP
Planning and Building Director

Cc: Mayor
City Council
City Administrator



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January 14, 2015

Planning Commission
City of Shoreline
17500 Midvale Ave. North
Shoreline, WA 98133-4905

RE: 185th Street Station Light Rail Subarea Plan

Dear Commissioners:

On behalf of the nearly 3,000 member companies of the Master Builders Association of King and Snohomish Counties (MBA), I am writing to express support of the proposed 185th light rail station subarea plan scheduled for public hearing before the Planning Commission on January 15, 2015.

By adopting the proposed subarea plan, the City of Shoreline is advancing the goals of the Growth Management Act (GMA) by promoting higher population densities to support neighborhood services such as retail and transit. The GMA requires cities to, "...encourage the availability of affordable housing to all economic segments of the population and promote a variety of residential densities and housing types." "State, regional and local land use plans share the goal of improving transit accessibility and encouraging transit use by concentrating mixed land uses near transit centers."

In addition to the proposed 500 acre rezone in the light rail subarea, the MBA strongly supports the form based regulatory provisions. Form based zoning provides increased flexibility that allows for a mix of compatible uses and styles controlled by bulk and scale requirements. This proposal enables opportunities for micro-housing, fee-simple unit lot subdivisions, townhomes, condominiums, apartments, and mixed-use developments. A major advantage to form based code is it creates a more predictable physical result while eliminating subjectivity often found in design guidelines.

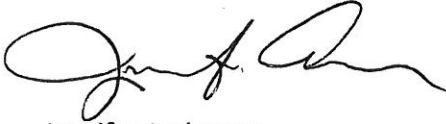
The MBA supports and encourages local actions to promote redevelopment and housing affordability. These include, providing sufficient land zoned for higher densities, revision of development standards and permitting procedures, reviewing codes for redundancies and inconsistencies, and providing opportunities for a range of housing types.

We encourage the Shoreline Planning Commission to consider the valuable effects of redevelopment and adopt the proposed 185th subarea light rail plan. Not only will this proposal create jobs and increase the tax base, but it will improve the quality of life for the citizens of Shoreline. More local tax dollars and

jobs raise the economic tide for the entire community, including the overall standard of living for residents.

Thank you for the opportunity to comment and for your consideration. If you have any questions, please contact me at janderson@mbaks.com or (425) 460-8240.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Anderson', written in a cursive style.

Jennifer Anderson
South Snohomish County Manager

Encl.: Goals of the Growth Management Act

Cc: Will Hall, Shoreline City Council
Alicia McIntire, Sr. Transportation Planner
Dan Eernisse, Economic Development Manager

Goals of the Growth Management Act

- 1: Encourage development in urban areas where adequate public facilities exist or can be provided in an efficient manner
- 2: Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development
- 3: Encourage efficient multi-modal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans
- 4: Encourage the availability of affordable housing to all segments of the population, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock
- 5: Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities
- 6: Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions
- 7: Application for both state and local government permits should be processed in a timely and fair manner to ensure predictability
- 8: Maintain and enhance natural resource based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.
- 9: Encourage the retention of open spaces and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.
- 10: Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
- 11: Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts
- 12: Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards
- 13: Identify and encourage the preservation of lands, sites, and structures that have historical and archaeological significance
- 14: The goals and policies of the shoreline management act as set for in RCW 98.58.020



January 14, 2015

Mr. Keith Scully
Shoreline Planning Commissioner Chair
Planning Commission
Shoreline City Hall
17500 Midvale Avenue N
Shoreline, WA 98133

Re: Comments on the proposed Shoreline 185th Street Station Subarea Plan and
Planned Action Ordinance

Dear Chair Scully,

Thank you for the opportunity to comment on the proposed Shoreline 185th Light Rail
Station Area Plan and Planned Action Ordinance.

We very much appreciate the hard work by the City of Shoreline staff, the City's
Planning Commission, City Council and residents to create a transformative plan for the
185th Station Area. This plan is a bold step toward a new vision for the neighborhood
which will have long-term benefits for the neighborhood, the City of Shoreline and the
entire Puget Sound region.

We are very pleased to see Shoreline propose transit-supportive densities within the
station area. Moving to a form-based code with allowed heights ranging from 35 to 85
feet will enable the City of Shoreline to accommodate housing and employment growth
in the City while minimizing negative impacts on existing neighborhoods and the natural
environment. We urge the City to adopt the proposed zoning and land use classifications
and boundaries.

We fully support the strong affordable housing program outlined in the proposed
Development Regulations. By requiring housing affordable to a mix of households and
incomes, the City of Shoreline is preserving housing affordability, an outcome repeatedly
requested by Shoreline residents, and ensuring that the City and region grow equitably
and fairly. Additionally, by providing affordable housing close to transit, the City is
enabling low-income families to not only reduce their housing costs, but also
transportation costs, two of the largest housing costs for all families significantly
increasing the financial stability of low-income families and their access to opportunity.

Below are a few recommendations that we feel will improve the Shoreline 185th Station
Area Plan and hope that you will consider:

Single Family Detached Land Uses – The transition from single family land uses to
transit-supportive multifamily and commercial uses will likely occur over many decades.



During this time, discouraging the construction of new detached single family homes, particularly in those areas with closest proximity to the station should be the policy of the City. The current proposal addresses this in two ways: first, by eliminating single family as a permitted land use in MUR-85 zones after 2020 and, second, by requiring that new single family units in MUR-35 and MUR-45 adhere to the existing, lower-density R-6 zoning classification.

We urge the City to consider additional measures to prohibit the construction of new single-family detached units within the station area where multi-family units are planned and zoned. We recommend removing single family detached as a permitted use in MUR-35 and MUR-45 zones, thus, creating new investment that is better in accordance with the City's vision of the area as set forth in this plan. Furthermore, we feel that the existing municipal code relating to non-conforming uses gives existing owners of single family detached dwellings the ability to repair and even expand (up to 10%) existing homes with conditional permits.

Minimum Density – In addition to limiting the construction of new single family homes in the station area, we also encourage the City to include minimum density requirements in the MUR-85 zone. For example, this could include a provision which requires new development to achieve a minimum FAR of 3 within the MUR-85 zone.

Housing Affordability – We support including owner-occupied housing in the station area's affordability program. However, as stated above, we believe single family housing is inconsistent with the long-term vision of the area. Instead, affordable home-ownership opportunities can be achieved in different product types including townhomes, multiplexes and condominiums. Placing long-term affordability requirements on single family homes may impede the ability for future property assemblage and redevelopment into higher density, transit-supportive housing.

Again, thank you for the time and energy that you have spent working to ensure the Shoreline 185th neighborhood can fulfill the full potential of transit-oriented communities. The proposed plan will support the transformation of the station area to a vibrant mixed-use neighborhood that is pedestrian-friendly, mixed-income and environmentally responsible. We urge you to recommend its approval and adoption to City Council and appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "ROB".

Rob Johnson
Executive Director