

From: [Nathan J. Beard](#)
To: [City Council](#)
Cc: dlrbjg@aol.com
Subject: Richmond Beach Preservation Association, public comment for tonight's meeting
Date: Monday, October 26, 2015 10:59:02 AM
Attachments: [RBPA comment.pdf](#)

To the City Council:

Attached, please find the Richmond Beach Preservation Association's public comment, for the record, for tonight's meeting.

Very truly yours,

Nathan Beard
President, Richmond Beach Preservation Association

Richmond Beach Preservation Association

19419 27th Ave NW
Shoreline, WA 98177

Nathan J. Beard, President
(206) 818-9991
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October 26, 2015

VIA EMAIL TRANSMISSION

Shoreline City Council
City of Shoreline
17500 Midvale Avenue N
Shoreline, WA 98133

Re: Public comment for October 26, 2015, City Council Meeting
Proposed amendment to Critical Areas Ordinance Landslide Hazard classification

To the City Council:

I hope this letter finds you well. I write to offer public comment for the record on behalf of the Richmond Beach Preservation Association, an organization of property owners on 27th Avenue Northwest. As you are aware, there are certain proposed changes to the Critical Areas Ordination dealing with how steep slopes / landslide hazards a calculated. At a recent meeting with the City Manager, and City Staff members, we learned the height of residential bulkheads and seawalls would be considered in calculating whether an area is a landslide hazard. This is contrary to our previous understanding and, evidently, the Planning Commission's understanding as well.

We ask that residential bulkheads/seawalls be excluded from elevation calculations relating to steep slopes / landslide hazards. The goals of the proposed changes to the Critical Areas Ordinance are, *inter alia*, (1) to benefit the environment and public safety; and (2) to increase the Ordinance's clarity and predictability. Presently, residential bulkheads are governed by the Shoreline Master Program and are subject to state and federal permitting guidelines. By including bulkheads into the Critical Areas Ordinances' prescribed landslide hazard calculations, homeowners along 27th Avenue Northwest's property are subject to competing regulations. Including residential bulkheads within the landslide hazard calculus achieves neither of the City's Critical Areas Ordinance goals; it has no effect on the environment or public safety and creates unpredictable and competing regulations for homeowners.

Accordingly, we ask that SMC 20.80.220 A "Landslide Hazard Areas" (attached hereto) be amended to include the following language:

3. The Vertical Elevation Changes of Residential Bulkheads, as defined in RCW 90.58 and WAC 173-27, shall not be included in the Vertical Elevation calculations of this section.

Richmond Beach Preservation Association

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Shoreline, WA 98177

This amendment will add to the clarity and predictability of the Critical Areas Ordinance.

Thank you for your consideration. If you have any questions or would like to discuss any matter further, please do not hesitate to contact me.

Very truly yours,

Richmond Beach Preservation Association

A handwritten signature in black ink, appearing to read "Nathan J. Beard". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Nathan J. Beard
President

Subchapter 2.

Geologic Hazard Areas

20.80.210 GEOLOGIC HAZARDS - Designation and purpose.

- A. Geologic hazard areas are those lands that are susceptible to erosion, landsliding, seismic, or other geological events as identified by WAC 365-190-120. These areas may not be suited for development activities because they may pose a threat to public health and safety.

Areas susceptible to one or more of the following types of hazards shall be designated as Geologic Hazard areas:

1. Landslide hazard;
 2. Seismic hazard;
 3. Erosion hazard.
- B. The primary purpose of geologic hazard area regulations is to avoid and minimize potential impacts to life and property from geologic hazards, conserve soil resources, and minimize structural damage relating to seismic hazards. This purpose shall be accomplished through appropriate levels of study and analysis, application of sound engineering principles, and regulation or limitation of land uses, including maintenance of existing vegetation, regulation of clearing and grading activities, and control of stormwater. (Ord. 398 § 1, 2006; Ord. 238 Ch. VIII § 3(A), 2000).

20.80.220 GEOLOGIC HAZARDS - Classification.

Geologic hazard areas shall be classified according to the criteria in this section as follows:

- A. **Landslide Hazard Areas.** Landslide Hazard Areas are those areas potentially subject to landslide activity based on a combination of geologic, topographic and hydrogeologic factors as classified in SMC 20.80.220(B) with slopes 15 percent or steeper within a vertical elevation change of at least 10 feet or all areas of prior landslide activity regardless of slope. A slope is delineated by establishing its toe and top, and is measured by averaging the inclination over 10 feet of vertical relief (see Figure 20.80.220(A)). The edges of the geologic hazard are identified where the characteristics of the slope cross section change from one landslide hazard classification to another, or no longer meet any classification.
1. The toe of a slope is a distinct topographic break which separates slopes inclined at less than 15 percent from slopes above that are 15 percent or steeper when measured over 10 feet of vertical relief; and
 2. The top of a slope is a distinct topographic break which separates slopes inclined at less than 15 percent from slopes below that are 15 percent or steeper when measured over 10 feet of vertical relief.