



940 NE 147th St
Shoreline, WA 98155

March 21, 2016

Shoreline Planning Commission
17500 Midvale Ave N
Shoreline, WA 98133

Subject: Additional Comment on 145th Addendum to DEIS

Dear Planning Commission and Mr Szafran:

Please accept our additional comments on the Addendum to the 145th 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 185th 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 145th 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 145th 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 145th. 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 145th 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 145th 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 145th 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 145th? 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 145th 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 145th Corridor project must include provision to replace the perched culvert under 145th 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 145th Corridor Study is not to be completed for over a year from when Council selected a Preferred Choice, how can the 145th 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 145th 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 145th 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