

## Attachment J - Comments on Addendum to DEIS

### Spoken Testimony on 145<sup>th</sup> Street Station Subarea DEIS Addendum

2/18/2016 Planning Commission

**Janet Way, Shoreline Preservation Society**, requested that the society have legal standing and be part of the public record pertaining to this agenda item. She commented that Paramount Park is an extraordinary place; not a degraded place that has no value. There is nothing else like it in the entire watershed and/or City. She said she has lived next to Paramount Park since 1988, and she has been working on its restoration and protection since 1989. Many projects have been done at the park via various groups, such as the Paramount Park Neighborhood Group and the Shoreline Preservation Society. She provided photographs of Littles Creek, which used to be called a Class II Stream. Although fish have trouble getting there because of the perched culvert that goes over to Jackson Park, there is a history of cutthroat trout and Coho salmon, and the stream should not be classified as non-anadromous. She provided photographs and described the various restoration projects that have occurred in the wetland and meadow area using grant funding from both the City and the County. She also provided photographs of the wildlife and plant species that exist at Paramount Park and the culvert on Littles Creek that needs to be replaced as part of the rezone to resolve flooding issues and create a bicycle path.

Ms. Way said that although the 2000 Thornton Creek Watershed Characterization Report, which talks specifically about the wetlands at Paramount Park, was referenced in the study, she voiced concern that the study undervalues the wetland. She reminded the Commission that the Army Corps of Engineers designated the wetland's overall size as 6.5 acres, and the report reduces the size by about half. She commented that as per the CAO, the City should go above and beyond to protect, not reduce, wetland. As public stewards, she begged the Commissioners to do everything in their power to enhance the wetland, not degrade it.

**Yoshiko Saheki, Shoreline**, observed that the Staff Report makes the point that, *"If single-family properties were not rezoned or did not redevelop, these non-conforming uses would remain indefinitely, neither posing significant new adverse impacts to wetlands and streams, nor providing opportunities for restoration."* Although OTAK's report is about redevelopment, no statement was included to indicate that the current zoning would provide no opportunities for restoration. She pointed out that homeowners could create raingardens, remove impervious patios and lawns, and plant native trees and vegetation, which are all good for the environment.

## Attachment J - Comments on Addendum to DEIS

Ms. Saheki noted that in her summary, Ms. Roberts writes that if single-family zoning were to convert to mixed-use residential, *“critical areas could be further protected and enhanced through future redevelopment under rezoning.”* In addition, the technical assessment concludes that, *“redevelopment could create substantial opportunities for ecological improvements and enhancements that do not currently exist.”* She summarized her belief that a lot of things are possible, both with and without redevelopment. Further, protection and enhancement of critical areas is possible under the status quo, and restoration by current homeowners may even be more easily achieved than through redevelopment, which after rezoning, would require willing sellers, buyers and developers.

Ms. Saheki referred to the statement that, *“non-conforming uses could be removed from critical areas.”* In this case, the reference to non-conforming uses applies to single-family homes. She emphasized that removal of these non-conforming structures is a possibility and not a certainty. While everyone wants what is best for the environment, she reminded the Commission that they are talking about peoples’ homes. The slightest implication that the City is interested in removing homes will cause the plans to backfire no matter how well intentioned. If either of the zoning alternatives are adopted, most of the single-family development in the subarea will become non-conforming. To read that non-conforming uses could be removed does not encourage people who live in the subarea to embrace the proposed rezone. She suggested there are more respectful ways to say the same thing, and the word “removed” is a little harsh.

**Dave Lang, Shoreline,** referred to Page 2 of the report, which discusses opportunities for restoration. He pointed out that Littles Creek is contained in the north/south pipe under 145<sup>th</sup> Street, which exits above the water level on the Jackson Park side. Re-drilling the pipe way for a larger diameter would provide an opportunity to change its shape and orientation down to the water level on the south side. Balancing restoration with handling stormwater should be the type of win/win the City looks for and writes up in its *CURRENTS* publication. He recalled that, at the last City Council meeting, it was pointed out that the Thornton Creek Basin was an early study that needs to be updated to address concerns that were addressed in later studies. He expressed his belief that finishing the basin study update before alternatives are selected will result in poorly-informed decisions.

## Attachment J - Comments on Addendum to DEIS

**Tom Poitras, Shoreline,** recalled that a number of trees died last year as a result of the drought. He asked if the City has studied or intends to study the net effect of the new impervious surfaces. He does not see how ground water would be replenished in local areas if the land is covered with concrete.

**Chris Southwick, Shoreline,** reiterated that wetlands are nature's sponges. They filter water and provide erosion control and habitat for wildlife. It is important to retain as many wetlands as possible, and the effectiveness of a wetland is reduced whenever its size is reduced or infringed upon.

3/3/2016 Planning Commission Meeting

**Janet Way, Shoreline Preservation Society,** asked that the Commissioners take the Hippocratic oath, "First, do no harm." She questioned how the people who live within ½ mile of the 145<sup>th</sup> Street Station Subarea would benefit from the plan. She also asked the Commission to consider the following:

- The culvert under 145<sup>th</sup> Street for Little's Creek should be a very high priority. Her understanding is that State Law and agreements with the Tribes require that the culvert be replaced. It is supposed to be a salmon bearing stream, yet fish cannot currently get up it.
- The culvert for Thornton Creek should be improved by putting in baffles so the fish can navigate more easily.
- A number of issues identified in the wetland study for Little's Creek would also apply to the 145<sup>th</sup> Street Corridor. The buffer and liquefaction zone need to be considered as mitigation.
- Other environmental issues to consider include noise and vibrations.
- As she mentioned in a letter a few months ago, there is an opportunity to provide a bicycle path through Paramount Park, but it was not included in the plan. There are also opportunities to improve drainage in this location.
- Everything possible should be done to discourage bicycles on 145<sup>th</sup> Street. It will cost a lot of money to acquire the extra ROW, and the bikes can be accommodated more safely on other streets.
- There has been some discussion at the Council level of having a bicycle/pedestrian bridge at 147<sup>th</sup> Street. If another bridge is going to be built anyway, why not put it on 147<sup>th</sup> to avoid conflicts at the intersection of I-5 and 145<sup>th</sup> Street?
- The estimated increase in traffic of just 1.5% seems too low. The City needs to better analyze future traffic volumes with the thousands of additional residents anticipated as a result of the rezone.

## Attachment J - Comments on Addendum to DEIS

- The transition to 5<sup>th</sup> Avenue NE is crucial. It will be a nightmare while it is being built, and it could also be a nightmare after it is finished.
- Safety should be the watchword. The 145<sup>th</sup> Street Corridor is not safe now, and if it is not planned properly, it will not be safe in the future. People have been hit and killed on the street, and it is important to change that.

### 3/17/2016 Planning Commission Meeting

**Wendy DiPeso, Shoreline**, said she had to leave the meeting early and wanted to provide her comments regarding the potential zoning scenarios for the 145<sup>th</sup> Street State Subarea Plan. She recalled that the consultant's (Otak) report indicated that it is possible to engineer and do construction on top of peat and wetlands. She also heard that it is possible to engineer development on steep slopes but it is costly. Although it may be possible to do this type of development, she questioned if it is something the City wants to encourage. She expressed her belief that developers will not likely want to spend large amounts of money to engineer development within wetlands and buffers so it is not really necessary to rezone these areas as high-density. They will be interested in land that is more suitable for high-density development.

Ms. DiPeso questioned why the City found it necessary to hire Otak when they already have the Thornton Creek Basin Characterization Report, as well as other similar reports that are more comprehensive and detailed than the report provided by Otak. She suggested that the City did not like the answers provided in the information that was already available so they used taxpayer dollars to hire Otak to give them the answers they wanted. Regardless of whether or not this perception is accurate, that is how the public views these kinds of transactions.

**Nancy Morris, Shoreline**, asked the Commission to use caution and care, as well as a science-based assessment of Paramount Park before minimizing its importance and infringing upon its established borders for the sake of unchecked development. Years of dedicated volunteer work went into the park to restore its grounds and wetlands. She emphasized that wetlands are vital for clean water and wildlife habitat, and Paramount Park is one of the largest in Shoreline at 6.9 acres. She questioned why various streams and other aspects of the park were missed in the recent report done by Otak. It is disconcerting that the City already had detailed information but hired another outside firm to do a report.

**Yoshiko Saheki, Shoreline**, distributed a handout with "before and after" photos taken of a segment of 1<sup>st</sup> Avenue NE. The top image is the most recent aerial photo taken in 2012, and the lower was taken in 1999. She noted the southernmost portion of Twin Ponds Park on the left side of both images. She asked the Commission to consider retaining R-6 zoning for the private properties near critical areas in parks. She believes the status quo is in the best interest

## Attachment J - Comments on Addendum to DEIS

of public critical areas. The operative principle is the Critical Areas Ordinance (CAO), which would apply whether the properties are up zoned or not. Since the CAO applies to properties as single-family homes, it seems that public critical areas would be better protected without changes in zoning. She asked the Commissioners to consider what happened to a critical area after the construction of Aegis Assisted Living on 1<sup>st</sup> Avenue NE, as illustrated by the images. She acknowledged that the facility provides amenities to the general public and future density may bring other new amenities. However, Beverly Pond, a small body of water located on the east side of 1<sup>st</sup> Avenue NE, was lost when Aegis was developed. The pond through which Thornton Creek flowed has drained and is now a wetland instead of a pond. When it was a pond, there was a bridge on the western edge that was visible from the street, which gave some charm to the neighborhood. More importantly, what was an open body of water for Thornton Creek is gone.

Ms. Saheki noted that Aegis has buildings much larger than single-family homes and future structures under the new MUR zones will probably be similar in size and scale. While she recognized that the single-family homes near Twin Ponds Park could not be constructed based on the current CAO, the existing development allows the current wetlands and ponds to continue. Again, she asked the Commission to retain properties near public critical areas to remain as R-6 zoning.

**John Lombard, Seattle**, said he was present to represent the Thornton Creek Alliance, which has members in both Shoreline and Seattle. He said the Alliance submitted a letter to the Community Development Director on January 29<sup>th</sup>, which was copied to the Commission and Council. His comments elaborate on the concerns contained in the letter, relating them to the DEIS and the addendum, as well as the choice of a preferred alternative. He referred to a book he authored titled, "Saving Puget Sound," as well as a book titled, "Subirdia," which was mentioned in the letter from John Marzluff, and a report by Don Norman that was attached to the list of bird species that have been found in Paramount Park and surrounding neighborhoods. He made the key point that wildlife benefits from natural reserves like Paramount Park, but they benefit much more if the surrounding areas compliment rather than conflict with the reserves. Both Professor Marzluff and Mr. Norman note that typical suburban residential development compliments reserves to the point that bird diversity can actually be greater in those areas than you would find in some large, protected preserves. The bird feeders, nesting boxes, and forested canopy compliment and expand the area of trees and vegetation that the reserve, itself, provides. He voiced concern that this point is not recognized or even addressed in the DEIS or in the addendum. While the addendum looks at parcel-level improvements when non-conforming uses redevelop under new regulations, it does not address the larger landscape level issue that is central to the Alliance's concerns and is central to the research of Professor Marzluff and Mr. Norman.

## Attachment J - Comments on Addendum to DEIS

Mr. Lombard said the Staff Report states that the EIS should evaluate the maximum possible impacts before a final decision is made that might actually reduce them. He expressed his belief that this statement is an accurate characterization of the Planning Commission's responsibility to recommend a preferred alternative that seriously considers possible modifications to alternatives that are in the DEIS. He said the Alliance supports the Compact Communities Alternative, with the critical areas overlay and with the understanding that, within the overlay, it would be appropriate to have more limited development. The Alliance would appreciate clarification as to the City's views of the implications of the critical areas overlay. The Alliance would prefer a phased approach and they support the Green Network, which was in the original DEIS proposal. The Alliance is unclear about the significance of staff's recommendation to replace the Green Network with the Off-Corridor Bicycle Network. They support trees and vegetation across corridors throughout the area rather than just focusing on bicycle traffic on the roads. There are fewer areas that are identified as connecting corridors in the Off-Corridor Bicycle Network as compared to the Green Network.

Mr. Lombard commented that Ms. Way would be sharing the results of a report done by Dr. Sarah Cook, which differs with the addendum as to the location, size and category of the wetlands found in Paramount Park and the surrounding area. The report also differs with the addendum in regards to stream locations, and she highlights the significance of soils and geology in the area, both for the actual developability of properties surrounding Paramount Park and for the impacts the development would have on streams, wetlands and habitat.

**Janet Way, Shoreline**, said she was representing the Shoreline Preservation Society. She requested that the Society have legal standing and become a party of record. She asked that all of her comments (previous, present and future) be adopted into the record by reference. Given the new addendum and potential changes, she also requested that the comment period be extended at least until the proposal has been presented to the City Council. She expressed her belief that the City needs to go back to the drawing board on the addendum. She presented the Commission with a number of items, including a report by Dr. Sarah Cook. She also provided pages from the City's 2004 Characterization Report, which states quite clearly (Page 417) that, "Paramount Park between 10<sup>th</sup> and 12<sup>th</sup> Avenues NE, north of 145<sup>th</sup> Street is one of the largest wetlands in the City, at approximately 6.9 acres." She said she is curious why the new characterization report diminishes the wetland down to less than 2 acres. From listening to the consultants present the report, it appeared that the only reason for doing this was to increase the area available for redevelopment. She emphasized that it is the City and Planning Commission's job to protect, enhance and even expand the wetlands and open spaces. If more density is added around the station, the wetland will have to absorb a lot more runoff, pollution, etc.

## Attachment J - Comments on Addendum to DEIS

Ms. Way commented that Paramount Park is an extraordinary place, and she invited Commissioners to visit. There is no other place like it in the entire watershed or in the City. It retains huge amounts of clean water, and it is a major headwater of Thornton and Littles Creeks. It is also a vital wildlife corridor that provides clean air and clean water. Protecting and enhancing the wetlands and open space becomes even more important as density is increased. When the Commission gets to the point of making a recommendation on zoning, she asked that the areas around Paramount Park retain their current R-6 zoning. It will be a detriment to the City to allow development to occur right up to the wetlands. The Society and other groups have done an enormous amount of restoration and enhancement at the park, and there are more areas that need to be fixed. The City should go out of its way to protect it. She said her same comments would apply to the wetlands and streams in Twin Ponds Park, as well. She emphasized that the public should be notified if the map is changed at some point in the future.

**Patty Hale, Shoreline**, said her husband was the superintendent for Turner Construction, the general contractor for the light rail station on Capitol Hill. She noted that not seen are the 6-story, 65-foot maximum height mixed-use buildings that are anticipated to be developed. Even Capitol Hill, with a light rail station that connects most of Seattle, does not have the heights that are currently being proposed for the 145<sup>th</sup> Street Station.

Ms. Hale referred to Ms. Redinger's comments about density around the park and reminded the Commissioners that Paramount Park is already programmed at capacity during the sport seasons. Adding more density will not give more people places to play. She voiced her belief that R-6 density should be around the perimeter of the upper portion of Paramount Park. She reviewed the historic drainage problems associated with this area of the park, which only got worse when Paramount Park Elementary was demolished and the playfields were put in. When the City incorporated, the playfields had to be redone to address a variety of drainage problems. Allowing more development will decrease the ability for absorption to take place naturally. She recommended that the City maintain minimum soil disruption and limit development around the upper Paramount Park Playfield and natural space, as well as Twin Ponds Park. These open spaces help control water runoff, and covering them with development is not the right approach.

**Dr. Corey Secrist, Shoreline**, said he first found Paramount Park while on a bicycle ride, and he decided to purchase a home in Shoreline that was within walking distance to the park. He views the parks as the jewels on a necklace, and he urged the City to protect them. He does not support the plan for additional density, but even from the perspective of trying to increase population and create commercial viability, the parks are high selling points for attracting new residents to the area. He said the Commission should keep in mind that denser development will result in less soil to absorb the water, and the parks will be very important to maintain the

## Attachment J - Comments on Addendum to DEIS

flow of clean water and produce clean air. He asked the Commissioners to carefully consider the reports submitted by the Shoreline Preservation Society that outline how Paramount Park has and will continue to change.

**Dr. Sarah Cook, Seattle**, said she was hired by the Shoreline Preservation Society to examine Paramount Park. She pointed out that the Growth Management Act (GMA) requires that counties and cities use Best Available Science (BAS) in developing policies and regulations to protect the functions and values of their critical areas. All the ensuing studies and policies must take BAS into consideration before any activities are undertaken in critical areas that might affect their integrity. She emphasized that the Paramount Open Space and the adjacent neighborhood to the east is the largest remaining wetland area in Shoreline and the Thornton Creek Watershed. For that reason, the Commission needs to consider the importance of the area. She also emphasized that since the headwaters of the entire Thornton Creek Basin is located within Shoreline, the increased percentage of impervious surface will certainly affect the downstream receiving water.

Ms. Cook referred to her detailed report, which was previously submitted to the City. She asked that the Commissioners read the report, which consolidates all the information that was included in the 2004 Thornton Creek Watershed Report that was done by Tetra Tech and is a much more comprehensive study than the study performed by Otak. Her report also summarizes some of the information in the 2004 Thornton Creek Watershed Report that included all of Shoreline and Seattle. She said her report examines soils information because the City's geotech report does not cover soils and there is currently no mapping for the soils in the City of Shoreline. While it is known that there is a high percentage of peat deposits in both Twin Ponds and Paramount Parks, the City does not know where they are located. Therefore, the potential for development becomes very difficult to identify. The newest geotech report only looked at the potential problems of peat deposits and high ground water from the perspective of how it would impact development. They did not consider what compacting peat soils and building on them could do to dewater the wetlands and streams within the Thornton Creek Watershed.

Lastly, Ms. Cook said she reviewed the accuracy of the wetlands and streams mapping done by Otak during the dry season of 2015 versus the study that was done in 2004 by Tetra Tech. She reported that she and Ms. Way visited each of the areas where there are discrepancies between the old and new maps, and Figure 6 of her report identifies each of the areas where she found wetlands and Otak did not. She encouraged the Commissioners to review her report, which consolidates the information in the old report and compares it to the new Otak reconnaissance. She concluded that when making an informed decision relative to zoning, it is important for the Commission to use the larger acreage (6.9) and the alignments of streams



## Attachment J - Comments on Addendum to DEIS

contained in the City's GIS database rather than the new work that was done by Otak, which she feels is very inaccurate.

**Jeff Eisenbray, Shoreline**, said his interest is in preservation of the unique views from Paramount Park. In this lowest income area of the City, it affords views to the south, east and west, and the current plans would block the views completely and diminish the value of the park to the community. He noted that none of the alternatives provide provisions for the protection of riparian recharge areas, and he supports the concerns raised by the previous speakers. He asked that the City create maps that describe flood water retention zones. To construct to the proposed density, he presumes there will be retention ponds, but the locations are not indicated anywhere. This information would be helpful for citizens to envision how the buildout is supposed to look in the future. He also asked the Commission to consider protection of single-family homes from the loss of southern exposure, especially those that border 155<sup>th</sup> Street. A full build out means that adjacent properties would be completely shaded from their southern exposures.

Mr. Eisenbray said he would like to see prescribed building standards for LEED Certification and to minimize the effects of impermeable surfaces. There are a number of environmentally-sensitive building practices that could be required in these areas to guarantee that the quality of construction is very high. He said he finds the parking projections to be unrealistic, and he asked that they be upgraded. He does not know of any examples in his neighborhood of licensed drivers who do not have a vehicle. While it is a lovely idea to provide neighborhoods that encourage walking, the reality is they become choked with cars when no off-street parking provisions are in place.

**Lindsay Hannah, Shoreline**, said she recently purchased a home in the North City Neighborhood and chose to move to Shoreline because she is excited about light rail. She is also excited about the subarea station planning, which is a huge draw to Shoreline right now. She loves the characteristics of the neighborhoods and her single-family home, and she commiserates with those who have concerns with the changing characteristics of their neighborhoods, especially around the 145<sup>th</sup> Street Station. At the same time, she expressed her belief that it will be a huge asset to the community in the future to have TOD. As a resident who just moved to the City, she looks forward to the walkability, bikeability and near proximity that light rail will provide.

Ms. Hannah referred to the thoughtful concerns that were raised about critical areas, and she urged the Commission to take the concerns into consideration as they move forward and refine the details of the Subarea Plan. She emphasized the importance of keeping momentum going

## Attachment J - Comments on Addendum to DEIS

by deciding which zoning option to move forward with, and she believes the Compact Community Alternative is more attractive unless the 5<sup>th</sup> Avenue residents are urging a rezone at this time. She would prefer to keep the growth consolidated around the light rail area. If there is a desire to expand the more intense zoning out through the corridors, it could be an option at a later point.

**Tom Lawler, Shoreline**, said he is a resident of the Meridian Park Neighborhood and agreed with the comments provided by Ms. Hannah. As a young person who recently moved to Shoreline, he is excited about the new development and about light rail. He also expressed similar concerns around the Paramount Park and Paramount Open Space, which can be jewels in a very beautiful necklace for Shoreline. Going forward, he urged the Commission and City Council to keep the momentum going. He said he is excited about connecting the 155<sup>th</sup> Corridor to Aurora Avenue North. This is a strong move that will link development and make the area more walkable and bikeable. Having more development outside of the area would make the light rail stations a greater asset, especially when they are linked to existing corridors.

**Christine Southwick, Shoreline**, voiced concern that taller buildings would change the amount of air flow and sunlight that reaches the Paramount and Twin Ponds Parks. The vegetation in the parks, as well as the vegetation on surrounding residential properties, would be impacted by these changes. She also voiced concern that the proposed changes could alter wind flow and bird patterns. She recommended that the height limit should remain lower for the properties that surround the two parks.

**Diana Coleman, Shoreline**, said she works in Downtown Seattle and is in the City every single day. She purchased a home in Shoreline because it provided an opportunity for her family be near the City but have some personal space. She spends time every day in her backyard, which backs up to the Paramount Open Space, and she hears birds every single day. She said she would hate to see her neighborhood turned into a concrete jungle.

## Attachment J - Comments on Addendum to DEIS

**From:** [City Council](#)  
**To:** [Lisa Basher](#)  
**Subject:** FW: Paramount Park  
**Date:** Wednesday, March 16, 2016 4:07:14 PM

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Could you forward this to the Planning Commission and include in your public comments?  
Thank you!

Heidi C.

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**From:** Cathy Aldrich [mailto:cmacathya@yahoo.com]  
**Sent:** Wednesday, March 16, 2016 3:43 PM  
**To:** City Council; Preserve Shoreline  
**Subject:** Paramount Park

Dear Council,

This is regarding the September 17 meeting of the Planning Commission, I have a prior commitment so cannot make my voice heard at the meeting.

I live just above the Paramount Park wetland in the area being considered for rezoning. I also read through the complete EIS that the City commissioned, which seems to imply that any development will not have an impact upon the wetland area. This premise should be called into question since the maps of the proposed rezone area actually show housing being built in areas that the EIS deems to be buffer zones.

If the housing that is currently on site is deemed to be encroaching upon the margins of the wetland area, how in the world would rezoning for mixed use, and allowing building on these same lots *not* encroach? Not only that, the likelihood of a large influx of new residents caring as much for the park area as the current residents do would also be questionable. Those of us who live in this neighborhood know we have a gem and we take good care of this important resource.

The residents, quite the contrary to the EIS, know this to be an important, if small, ecologically viable drainage system that attracts a large variety of birds and wildlife. In my own yard I have identified close to 50 different species of birds, attracted by the Paramount Park wetland area.

The needs of developers should not take precedent over saving the few, small pockets of wetlands that remain in our area. If anything, the City should look to expand those wetlands for the sake of any future residents, not build the areas up just because of what *might* happen years in the future, even with the inevitable arrival of light rail.

Thank you for your time.

Cathy Aldrich  
Shoreline WA

# Attachment J - Comments on Addendum to DEIS



940 NE 147<sup>th</sup> St  
Shoreline, WA 98155

March 21, 2016

Shoreline Planning Commission  
17500 Midvale Ave N  
Shoreline, WA 98133

**Subject: Additional Comment on 145<sup>th</sup> Addendum to DEIS**

Dear Planning Commission and Mr Szafran:

Please accept our additional comments on the Addendum to the 145<sup>th</sup> DEIS and Subarea.

**Planned Action Ordinance**

We wish to point out that one crucial aspect of the City's plans will have an additional negative impact to the environment. That is the proposal to pass another Planned Action Ordinance as was done on the 185<sup>th</sup> Subarea. The reason this would be particularly detrimental is that because there are so many sensitive or critical areas such as wetlands, creeks and steep slopes in the 145<sup>th</sup> Light Rail Station Area, they are at risk because of the way the City is going about the EIS and Subarea planning effort.

The City proposes to use the Planned Action Ordinance as an overall statute allowing development to go forward without any further input from the public. The staff state repeatedly that any particular environmental issues such as wetlands on or near properties with development proposals would be protected by further environmental review conducted by the City and individual developers. But unfortunately, there would be no notice, no comment period and no potential for appeal for any members of the public who wish to provide information about particular sites proposed for development. Frequently with input from the public, the staff are made aware of special circumstances on a site, such as a wetland, a buffer, an easement, or a traffic or infrastructure detail that has been unknown to the City or developer. Because each site is unique, especially the ones surrounding the three major parks in the 145<sup>th</sup> Rezone area, it is highly valuable for planning staff to include this input from the public in determining environmental impacts of a particular development.

But none of this would be possible because the Planned Action Ordinance prevents any input from knowledgeable members of the community.

## **Attachment J - Comments on Addendum to DEIS**

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?

## **Attachment J - Comments on Addendum to DEIS**

Some sensitive areas surrounding the local parks need to be protected from the pressures to develop. Many of these properties are steep forested slopes, stream or wetland buffers. What are the plans on the Pro Parks initiatives? How much would it cost the City to acquire these sensitive areas to protect them? Has that been analyzed in this Addendum to the DEIS? We do not see much discussion of that in the Addendum to the DEIS

### **Trails and Bike/Ped Routes**

Have the trails through Paramount Park or other parks been analyzed to determine what it might take to upgrade them for bike/ped pathways, possibly with boardwalks to protect sensitive areas, safety and possible lighting issues? The idea of a trail through Paramount Park has a lot of advantages as an additional option for Bike/Ped users to avoid 145<sup>th</sup>. Drainage is an important matter to consider with the “Greenways” that are included in the plans. Have LID techniques been included in analysis of this proposal for trails and paths with trees? What will it cost for the drainage and for tree planting? Will property acquisitions be considered as part of the “Greenways” planning? How much would that cost and what are the sources of potential revenue to pay for them? Have culverts that are connected been analyzed according to state law? Those must be considered to find ways to improve the watershed areas.

### **Traffic Impacts of Light Rail Station and 145<sup>th</sup> Corridor Proposals**

There is a big potential problem with the process to move forward with Preferred Alternative on the Subarea, when the City has not yet completed its environmental review process on the 145<sup>th</sup> Corridor Study or the Light Rail Station design.

There has been no serious evaluation connected with this addendum or EIS of how traffic attracted to the Light Rail Station or 145<sup>th</sup> Corridor would impact or be impacted by Upzones and the Subarea Plans. How many buses would have to access Fifth NE hourly, daily, or weekly? How would cut-through traffic affect the neighborhood? How would excess parking affect the neighborhood? How will the added street lights affect traffic flow? How will additional density affect access to Light Rail and 145<sup>th</sup>? How will bus and auto traffic affect the I-5 bridge and how will changing the entrances and exits to I-5 change traffic patterns in the neighborhood? These are all important questions that will affect the subarea. How will the massive tree removal along I-5 for Light Rail impact air, water and sound quality in the neighborhood?

The intersection at Fifth NE and 145<sup>th</sup> is already dysfunctional. Even on recent Saturday and Sunday afternoons there is traffic backed up through two light changes. This is already unacceptable.

We also need to reiterate that the 145<sup>th</sup> Corridor project must include provision to replace the perched culvert under 145<sup>th</sup> by State and Federal law to reconnect fish passage on Littles Creek. Littles Creek is a major tributary of Thornton Creek and the current culvert is illegal.

## Attachment J - Comments on Addendum to DEIS

If the EIS for the 145<sup>th</sup> Corridor Study is not to be completed for over a year from when Council selected a Preferred Choice, how can the 145<sup>th</sup> Subarea be planned and approved without adequate information?

Considering the facts that there is so much missing information to address the Addendum for the DEIS, we conclude that the Planning Commission must take a more thoughtful and reasonable approach. We ask that the Commission request more information be studied. Include the existing City documents that have already been done such as the 2004 Thornton Creek Watershed Characterization Report, the upcoming Twin Ponds Wetland Delineation and the 145<sup>th</sup> Corridor Study. We ask that these be included and that the Commission should delay making a recommendation to the Council until a more complete Addendum is provided.

Also, since a new version of the Planning Commission 145<sup>th</sup> Committee Preferred Alternative is being put forward and the community has not been notified of this revision, there is ample reason to extend the comment period until after these changes and information has been made available to the public and proper notice has gone out to surrounding communities.

We also strongly urge that the Planning Commission consider rejecting the proposal for a Planned Action Ordinance because it leaves too much to chance and there is too much environmental risk at stake. Instead we suggest imposing a SEPA review process that will provide proper oversight.

We also ask that the Commission consider concentrating on Phase I of the Subarea Upzone near the Light Rail Station, and delay the upzoning of Phase II for at least 20 years. That way you can keep the low scale R-6 zoning around the parks to prevent negative impacts and unintended consequences.

Finally, we strongly urge that a Critical Areas Overlay be included in the Subarea. This should be studied in the DEIS. But it would give an important extra layer of protection to these important sensitive and recreation areas.

Thank you for the opportunity to comment.

Sincerely,

Janet Way, President  
Shoreline Preservation Society

## Attachment J - Comments on Addendum to DEIS

**Lisa Basher**

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**From:** Plancom <plancom@shorelinewa.gov>  
**Sent:** Wednesday, February 17, 2016 1:12 PM  
**To:** Donna M. Moss; Rachael Markle; Steve Szafran; Easton Craft; David Maul; William Montero; Paul Cohen; Lisa Basher; Jack Malek; Laura Mork; Miranda Redinger; donna.moss.thomas@gmail.com; Julie Ainsworth-Taylor; Susan Chang  
**Subject:** FW: Comment on Wetlands Update - 145th Light Rail Station Area Planning

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**From:** Megan Kogut[SMTP:MBKOGUT@GMAIL.COM]  
**Sent:** Wednesday, February 17, 2016 1:11:27 PM  
**To:** Plancom  
**Subject:** Comment on Wetlands Update - 145th Light Rail Station Area Planning  
**Auto forwarded by a Rule**

Dear Planning Commission,

I live at 15806 10<sup>th</sup> Ave NE, about ½ north of the Paramount Open Space. I walk my dogs in the Open Space regularly, and I use the rather grim tractor/tree combination at the south end of the park as a local tourist destination for house guests. I also occasionally jog in Twin Ponds Park.

I write in support of the conclusions of the Otak memo of January 29, 2016 and the accompanying Wetlands and Stream Assessment. I would be at the Planning Commission meeting on Thursday, February 18, if I didn't have a prior commitment out of town that night.

I happen to have a PhD in environmental engineering from the Massachusetts Institute of Technology Department of Civil and Environmental Engineering, where I received a well-rounded education in environmental science, including chemistry, limnology and wetland science, microbiology and hydrology. I also took several environmental law and policy courses at the MIT Sloan School of Management and a course in landscape design. As faculty at UW Tacoma, I've created and taught six separate courses related to environmental science, policy, and natural history in the Pacific Northwest.

I roll out my credentials here because I feel that I am well-qualified to say that you don't need much of a science background to appreciate the implications of the Otak report. It is clear that redeveloping the areas around Paramount Open Space, and around Twin Ponds Park, open the door to possibilities for meaningful and significant environmental benefits for those parks and the people who visit them.



## **Attachment J - Comments on Addendum to DEIS**

As a natural historian, I understand well why single family houses were built on wetlands and riparian areas all over Shoreline and beyond the Growth Management Act was enacted. And I appreciate efforts of those adjacent to the wetlands and creeks to protect those natural assets as if they were their own.

But, the next person who purchases one of those non-conforming properties might not be so like-minded. I feel that going forward, knowing more, we can improve on the past by eventually removing non-conforming structures and landscaping, implementing buffer zones, managing stormwater quality and quantity, taking full advantage of required mitigation for new construction, and creating opportunities for high quality restoration as well as passive recreation.

The Class III and IV wetlands, surrounded by weedy hills and the backyards of houses, have so much potential for aesthetic and functional improvement and better accessibility. They are wetlands that survived by virtue of being difficult to “reclaim”. And I appreciate ongoing volunteer efforts to add paths and remove invasive species. But the Paramount Open Space currently does not fully reflect today’s values for wetland function and passive recreation.

But, it could be a true crown jewel of Shoreline if restored and enhanced. The same possibilities exist for Twin Ponds Park, and creeks around both areas being considered for rezoning.

It may feel to some that tall residential buildings are inappropriate next to wetlands for aesthetic and personal reasons. There is some merit to that argument, but this is not the question at hand.

The question at hand is of course whether mixed use development, conforming to all existing laws and permit conditions, could have a lower impact on the wetlands and riparian areas than the existing use. The answer is clearly yes, in many ways, based on the results of the Otak report as well as common sense.

However, I will still address the question of whether it is inappropriate to put tall buildings next to wetlands for personal or aesthetic objections. I have a personal story of my own that I hope is considered alongside other people’s personal stories.

As you know, the Growth Management Act of 1990 has a clear purpose: to encourage growth within urban areas first. This rezoning, building up not out, is a clear example of fulfilling that purpose. That this rezone is next to some Class III and IV wetlands is a lucky chance to enhance them. But, ultimately, the purpose of this rezone is to protect more wetlands in rural areas.

## **Attachment J - Comments on Addendum to DEIS**

My parents moved to a five acre property just outside of Gold Bar, WA, in 1993. A salmon-bearing stream goes through their property, which is about  $\frac{3}{4}$  wetland. The wetland on their property is connected with extensive wetlands in the 100+ acre undeveloped property across the street, owned at one point rather ironically by a subsidiary of Eddie Bauer Inc. Those wetlands are all at least Category 2 if not Category 1 due to their large size and mature trees, since they have been undisturbed since a single logging probably a century ago. They also play a significant role in maintaining water quality and quantity in a salmon-bearing stream. Since about 2003 if not earlier, there has been constant pressure to clear, grade and build on the large property across the street. In fact the lot was partially logged about ten years ago in preparation for subdivision. Because this area is not served by a sewer district, the housing density would probably be around one house per acre due to septic field requirements. That sort of development, in that location, is a huge environmental impact on a higher quality wetland. And it is a huge environmental impact per person compared to a multistory apartment building. And then there are the environmental impacts of heating those large single family houses, commuting a long distance to and from those houses, and so on. Keeping this rural property, and many more like it, undeveloped is the primary motivation for the Growth Management Act. I estimate for the purpose of illustration that the 100 acre property could support 100 households or maybe 400 people. I imagine also that a multistory apartment building could support 400 people, walking distance from local amenities, a light rail station and extensive bus service.

It is time to set the stage to create communities with a far smaller footprint on the environment. And with mitigation and restoration, we can increase the size and quality of our local wetland remnants. We can grow them into relatively high functioning and accessible urban jewels. They would have more benefit to the environment and they would act as living classrooms and restful, safe urban retreats for hundreds, if not thousands of people. I'd even go so far to imagine that someday in the far future, the Paramount Open Space could become a protected but accessible centerpiece of new development, rather than a hidden and at times potentially unsafe open area accessed at the ends of a few dead-end residential streets and trails. The laws and policies related to future development are in place to ensure that happens going forward, especially with robust public support.

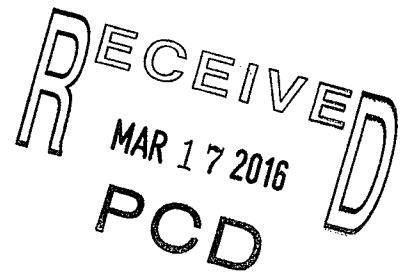
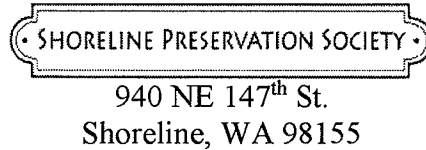
I look forward to the future of these urban wetlands. I realize there is no action on this report at this time, but I write in strong support of the Planning Commission eventually accepting the conclusions of the report and recommending that the rezoning will have a net positive effect on both parks overall. I look forward to commenting further and being able to attend meetings regarding this issue in person.

Thank you for your time.

Megan Kogut PhD

15806 10<sup>th</sup> Ave NE

## Attachment J - Comments on Addendum to DEIS



March 17, 2016

Shoreline Planning Commission  
17500 Midvale Ave N  
Shoreline, WA 98133

Subject: 145<sup>th</sup> Subarea Addendum to the DEIS

Dear Planning Commission and Mr Szafran:

Please accept our comment on the Addendum to the DEIS for the 145<sup>th</sup> Subarea.

I represent the Shoreline Preservation Society, a local non-profit working to preserve our environmental and historical resources throughout Shoreline, and we request Legal Standing and Party of Record Status on this matter. We ask that all materials, reports and comment made in this matter be incorporated by reference into the record.

We believe there is a likelihood of severe and significant impact to the environment as a result of the inadequacies of this DEIS Addendum, which cannot be mitigated unless it is corrected.

This Addendum to the DEIS is an important matter, and we are glad extra attention is being paid to the two major wetlands within the 145<sup>th</sup> Station Subarea. However, we have serious concerns about this report, especially the lack of adequate detail and inaccuracies presented as facts.

Paramount Park Open Space is an extraordinarily special place, which deserves extraordinary attention and protection. Neighbors here, groups I have been involved with have sought to highlight the assets here and to preserve and restore the environmental values it offers. Since 1989, we have expanded the park, fought to protect adjacent resources, and worked on many grant projects. In 1998, a group I was connected with carried out a major wetland enhancement project there, which removed fill dirt and recreated two ponds, which serve as water quality and wildlife habitat features. This and a subsequent project a few years later, were funded by grants from King County and the

## Attachment J - Comments on Addendum to DEIS

City of Shoreline. We worked with hundreds of volunteers, planted hundreds of native plants, created trails we installed educational signage and brought many groups to visit.

Wildlife habitat and native plants here are extraordinary and must be protected and enhanced.

At that time, the Army Corps had given the area an overall 6.9 acre designation as a wetland. Because the lands have been altered so many times, it is nearly impossible to ascertain what part of the original wetland remains. The fact is that there is clearly a very high water table and wetlands that emerge throughout the park. There are many channels of creek, and steep slopes surrounding the park. Some are in the Park and some are in the surrounding edges and buffers. Not all of the areas that are sensitive are adequately protected either by City ownership or by codes.

Now the Addendum to the DEIS, has put forward maps and reports that do not really clarify anything. Instead the report has minimized the size of the wetland. Those of us who have explored the park thoroughly know there are many, many places that are wetland or buffer or steep slopes, which are not clarified on these maps and in the report.

The aim of this report seems to have been to find every possible way to allow increased density next to the park and reducing the buffers rather than fulfilling the duty of the City, which should be to protect and defend these important wetlands. The report actually has major errors, such as creek channels in the wrong place, or missing entirely. Important wetland sections are also entirely missed. It makes little if any mention of the steep slopes surrounding it or the extraordinary nature of this wetland. Rather it makes it out to be a degraded place of little value and the creeks and wetlands are downgraded.

When asked for background data that was used to create the report, we were told there was none and that this was merely a "reconnaissance report" and therefore didn't need any scientific data to back it up! That has to be very the flimsiest possible basis Addendum to an EIS, done in the name of the taxpayers of Shoreline.

We have hired noted Wetland Biologist, Sarah Cook of Cooke Scientific to review the report. She has found many deficiencies in it. We ask the Commission to study her report and read it carefully and consider the implications of using an inaccurate and incomplete study as a basis for the Addendum to the DEIS. All of the work that goes forward from this report and decisions that will be made about the future of this entire area, the impacts to the ecosystem and watershed you are charged with protecting, depend upon accurate information based upon professional standards.

We suggest that the Commission direct staff to go back and do a more thorough study that truly takes into account the impacts to the neighborhood, the watershed and the community's future. Paramount Park Open Space is too important as future Park space but also as a vital wetland and repository for drainage. These wetlands do crucial work retaining floodwaters, and ground water to feed the stream in dry times. It will take the brunt of any major density increase unless extreme care is taken to protect it for future

## Attachment J - Comments on Addendum to DEIS

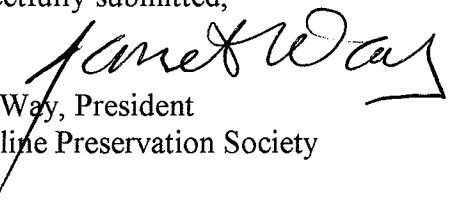
generations. There is just too much at stake for this ecosystem and community to give it short shrift.

We believe that options for protecting, mitigating and improving the park and wetland should be included such as LID techniques, replacing illegal culverts, uncovering other filled wetland areas, improved trails and native plant replacement projects should be a part of this report, not just suggestions on how to build next to wetlands or in liquifaction zones.

We ask that you do everything in your power to protect this open space and these critical areas.

Thank you for your attention to this important matter.

Respectfully submitted,

  
Janet Way, President  
Shoreline Preservation Society

# City of Shoreline

## Thornton Creek and West Lake Washington Basins Characterization Report

May 2004



**TETRA TECH/KCM**

1917 First Avenue  
Seattle, Washington 98101-1027





**COOKE SCIENTIFIC**

4231 NE 110<sup>th</sup> ST, SEATTLE, WA 98125

PHONE: (206) 695-2267 FAX: 206-368-5430

[cookess@comcast.net](mailto:cookess@comcast.net) [WWW.COOKESCIENTIFIC.COM](http://WWW.COOKESCIENTIFIC.COM)

March 10, 2016

Shoreline Preservation Society

**RE: City of Shoreline Paramount Open Space Wetland and Stream Assessment and Comments on the 145<sup>th</sup> Light rail Area DEIS and Subarea proposal.**

I have been asked to review the Wetland and Stream mapping and characterization performed by the City of Shoreline at Paramount Open Space.

As part of my review, I have examined the materials listed below as well as performed a site visit to examine various locations. The results of both are given below.

**Documents Reviewed**

- City of Shoreline. February 2016. 145<sup>th</sup> Street Subarea Planned Action, Addendum to the Draft Environmental Impact Statement.
- City of Shoreline. February 18, 2016. Additional Technical Assessments for the 145<sup>th</sup> Street Station Subarea Plan 6a. Wetlands Update LRSAP Staff Report. Including Memorandums from Otak on Wetlands and GeoEngineers on Geotechnical Assessment.
- Otak. Jan 2015. 145<sup>th</sup> Street Station Subarea Planned Action. Draft Environmental Impact Statement. Prepared for the City of Shoreline.
- R.W. Beck, Inc. July 2005. *City of Shoreline Surface Water Master Plan*. Prepared for the City of Shoreline, Wa.
- Seattle Public Utilities. 2000. Thornton Creek Watershed Characterization Report.
- Tetra Tech/KCM, Inc. May 2004. *Thornton Creek Basin Characterization Report*. Prepared for the City of Shoreline, Wa.
- Tetra Tech/KCM, Inc. May 2004. City of Shoreline Stream and Wetland Inventory and Assessment Appendices.

**COMMENTS AND REVIEW OF THE REPORTS AND SITE VISIT**

My comments below will be focused on the accuracy and deficiencies of the various reports listed above as they related to Paramount Open Space and the existing wetlands, streams, and overall critical areas found in the Park, including the downstream receiving waters of Thornton Creek. I also anticipate commenting on the Twin Ponds critical areas survey and how the

## Attachment J - Comments on Addendum to DEIS

rezone will affect this critical area, but the City's wetlands assessment is not yet ready so my comments on this will be reserved for a later date.

My main emphasis was to determine both in these reports and in the field:

- 1. The accuracy of the Wetland Mapping and Rating by Otak in 2015.**
- 2. The accuracy of the Stream Mapping within and adjacent to Paramount Open Space by Otak in 2015**
- 3. The need to protect the streams and wetlands in Paramount Open Space based on recommendations from the City's Surface Water Master Plan (R.W. Beck 2005) and the 145<sup>th</sup> Street Station Subarea Planned Action (Otak 2105).**
- 4. Soils and Geologic Mapping accuracy within and adjacent to Paramount Open Space and the implications of the soils and geology deposits on their potential to affect the wetlands and streams of Paramount Open Space and Thornton Creek as a result of the proposed high density residential development.**

It should be noted that the Growth Management Act (GMA) requires that counties and cities utilize Best Available Science (BAS) in developing policies and regulations to protect the functions and values of critical areas. All ensuing studies and policies must take BAS into consideration before any activities are undertaken in critical areas that might affect their integrity, functions, and values. It is in light of this that I performed the review given below.

**1. The accuracy of the wetland mapping and rating by Otak in 2015 (and how it compares to previous wetland inventories documented in the City's own database).**

In their wetland inventory included in the *Thornton Creek Basin Report* (May 2004), Tetra Tech identified the drainage and sub-drainage basins in the Thornton Creek Watershed, including Paramount Open Space (Figures 1 and 3). This includes wetlands and streams as mapped in Figure 5.

In the 2000 and 2004 Thornton Creek reports by the City of Seattle and Tetra Tech for the City of Shoreline including a wetlands inventory (Appendix B, May 2004), and the City's own GIS database (Shoreline online GIS Mapper) all quote the wetland acreage to be approximately 6.9 acres of forested, shrub, and emergent wetlands in two large wetlands (Appendix B, 2004 Thornton Creek Characterization Report, Table 1). The reconnaissance performed by Otak (City staff report and Otak Memorandum (January 2016) found seven smaller discrete wetlands for a total of only 1.97 acres (Figure 6— yellow and red polygons, Figure 7 detailed map of the reconnaissance). They show no wetlands in the southern part of the Park in the restored area, while we found many stream-associated wetlands in this



## Attachment J - Comments on Addendum to DEIS

part of the park, (Figure 6 arrows showing where additional wetland was found; Figure 8 photo map and Photos 21-25). We also found more wetland in the northeast corner of the Park and associated residences that are not shown on the Otak map (Figure 6 arrows showing where additional wetland was found; Figure 8 photo map and Photos 1-10). And more wetland in the central part of the park between Wetland F and Wetland C such that these two wetlands are actually one wetland system (Photos P1, P2, P18, and P19). Additionally, many of the residences on the east side of the Park along 12<sup>th</sup> Avenue NE had wetland continuing into their western back yards abutting the Park (Figure 6 arrows showing where additional wetland was found; Figure 8 photo map and Photos 12-20). Much of this area was also not included as wetlands mapped by Otak. Approximate GPS locations of wetlands found during our February reconnaissance are shown on Figure 8 where the photo pins are located and on Figure 6 where the arrow points indicate locations where both photos and GPS points were taken in areas that were wetlands.. The arrows shown on Map 6 do not show a formal delineation map. It is indicating areas that met wetland criteria and which were not identified on the Otak map as being wetland. A word about the photos included: The photos show characteristics about the ground conditions – either the vegetation prevalent (which is usually wetland species for the wetland shots) or the soils conditions (again showing wetland soils), or standing water indicating the area has wetland hydrology. When the shots are of upland they indicate this.

The Otak reconnaissance wetland map is also displayed as a layer on the City's Wetland map as a layer that is shown as either a blue or yellow polygon/series of polygons on Figure 6. as the with Wetland III having a much reduced footprint of wetland WL-I and the red pattern with a much reduced footprint over the previous delineation also shown as the blue shaded pattern on Figure 6.

The wetland ratings listed in the Otak reconnaissance from August and September 2015 were all listed as Category III and IV wetlands (see table at top of Figure 7), while the City's wetland inventory reports 4 Category (type) II wetlands and 5 category (type) III wetlands within the Park and three Category (type) II wetlands and 1 Category (type) III wetland just adjacent to the Park. While I did not rate the wetlands during my site evaluation it should be noted that I sat on the team that developed the 1992 wetland rating and I was a technical reviewer and taught the method for the Department of Ecology for the subsequent version (2004 updated in 2008) used for this analysis and I find it unlikely that some of the forested wetlands I saw out in the Park would be less than a Category II wetland rating. The rating should be revisited when a formal delineation is performed because the buffer widths proposed could possibly change as a result of the ratings changing from a Category III to a Category II wetland. This would obviously affect the development footprint on the lots just adjacent to, or including the wetlands that would be a Category II type. The buffer widths assigned to the

Wetlands identified varied from 105 to 165 feet for the forested systems. According to that designated by Otak. Since Category II wetlands under Shoreline Municipal Code (20.80.330 9City of Shoreline , 2016) are assigned the same buffer widths as those assigned for Category III wetlands the width would not have changed unless the scoring for habitat on the data sheets changes. However, changes to the wetland boundary could significantly change the amount of developable land that would be available on the Its along 12<sup>th</sup> Avenue NE.

The two ponds and associated Wetland WL-F on Figure 5 were enhanced and/or constructed by local volunteers under a Water Quality Block Grant awarded by King county Department of Natural Resources prior to the 2004 basin characterization report. These areas are now well established and the plantings installed back in the early 2000's are now well established. Photos on photo sheet 6 of the attached photos show some examples of this area.

### **2. The accuracy of the Stream Mapping within and adjacent to Paramount Open Space by Otak in 2015**

In the 2000 and 2004 Thornton Creek reports by the City of Seattle and Tetra Tech for the City of Shoreline including stream inventory (Appendix A May 2004), and the City's own GIS database (Shoreline online GIS Mapper) all show the streams to be mapped as shown on Figures 5 and on Figure 6, (the overall outline including both the blue and black segments). Figure 6 also shows the seam/creek reconnaissance identified by Otak in their December 2015 reconnaissance as the blue segments with the detailed stream reconnaissance shown on Figure 7.

The drainages (streams and creeks) mapped in the Park by Otak (Figures 6 and 7) include some omissions that have been added back as the black lines on the City's GIS database (Figure 6). We observed these creeks/drainages are still present when we performed our reconnaissance on January 29<sup>th</sup>, 2016 (Photos P8, P9, P11, P17, P20, P23, P24, P21, and P25). Little's Creek is the main tributary to Thornton Creek through the park but there are many other tributaries, wetlands, ponds and connecting channels that are also present (See Figures 5 and 6). Some of the channels are now piped, especially the main channel that passes through a culvert under the gravel road the bisects the Park from north to south (photo P17).

Little's Creek (Subbasin TC-C – Figure 3) flows through Paramount Open Space through segment TC14 mapped on Figure 5 as a tributary to Thornton Creek. The aerial photograph evidence documented in the City's Thornton Creek Characterization Report states that it flowed to Jackson Park in an open stream prior to the 1940's (Tetra Tech 2004). Much of this Creek has been piped from residences west of NE 174<sup>th</sup> Street and 14<sup>th</sup> Ave NE with another tributary that is now also flowing from a culvert. Beginning at 12<sup>th</sup> Ave NE, the creek (Figures 5 and 6) come out of a pipe and flow west to the Park and then jog south where the tributary splits into two. The western arm, which is the main channel of Little's

Creek, flows through Wetland WL-1 (2004 inventory, Figure 5) and a drainage tract with landscaping; and the eastern arm flows through on the edge of Wetland WL-L and through Wetland WL-F (also Figure 5 where it enters the pond and wetland enhancement area identified above supplying the wetlands, seeps back into the second pond via small channels described above and then flows west into the main channel of Littles Creek. The stream through the Park is generally still in good condition with sufficient bank vegetation and sparse armoring and fair pool frequency. Gravel and quarry spall is present in the south end of the reach but overall this segment is the ONLY one of the three segments of Thornton Creek within the City of Shoreline that was given a "fair" rating when assessed (Tetra Tech 2005). It is imperative that the City do all it can to maintain the integrity of these tributaries should the new zoning become reality. Increasing residence density on the east side of the Park would be in the direct path of many of these channels and no additional piping should be allowed. It should be noted that the DEIS states that Littles Creek lies ½ mile from the Proposed Light Rail Station, but actually it is only ¼ of a mile.

**3. The need to protect the streams and wetlands in Paramount Open Space based on recommendations from the City's Surface Water Master Plan (R.W. Beck 2005) and the 145<sup>th</sup> Street Station Subarea Planned Action (Otak 2105).**

In 2004 the drainage study evaluated the total impervious areas in subdrainage TC-C to be 45 percent (Tetra-Tech, Thornton Creek Characterization Report, Figure 3). The future build-out of the subdrainage projected an increase to 50 percent impervious if the zoning stayed the same at R-6. Changes from a R-6 zoning to the proposed MUR-30 and MUR40 and MUR 70 proposed adjacent to the Park will increase the amount of impervious surface up to 90 percent with the equivalent of 48 units/acre and 75 percent with 18 units per acre (Tetra Tech 2005 Table 2-3). This increased impervious surface would be associated with increase surface flow in streams post-storm event. The Tetra Tech report also states that it could "result in flooding and destroy aquatic and riparian habitat by eroding banks, and removing the riparian (stream-adjacent) vegetation".

The DEIS states the stormwater runoff (analysis) is only very preliminary: "The analysis of change in peak discharge was for DEIS planning purposes only and does not reflect actual expected post-redevelopment conditions". How does the City expect to vote on this rezone with no real idea of what may occur as a result of the proposed changes?

**4. Soils and Geologic Mapping accuracy within and adjacent to Paramount Open Space and the implications of the soils and geology deposits on their potential to affect the wetlands and streams of Paramount Open Space and Thornton Creek as a result of the proposed high density residential development.**

## Attachment J - Comments on Addendum to DEIS

Paramount Open Space and the area directly to the south have been mapped as being underlain by Esperence Sands and Younger Alluvium (Tetra Tech 2004). It is the only area in the entire Shoreline part of the basin with Younger Alluvium. It seems likely that the young alluvium mapped is recent sediment deposited as the basin became developed. This means that this area is unstable and prone to erosion when the soils are disturbed. There is certainly the expectation that new development would add additional sediment to this area, which could pose a problem to the streams and creeks in the area and also for the water quality of Thornton Creek in the downstream receiving waters.

There is no way to verify this independently through NRCS soils maps since there is no soils mapping available through the regular sources for the City. Extensive research online (NRSC soils mapper), in the City's database (GIS Mapper), and in the King County hard copy soils mapping (Snyder, Gale, and Pringle. 1973, Soil Survey of the King County Area) have yielded no soils data for the City, including the Park and adjacent properties. This is all the more reason why the City should have done some preliminary soils evaluations for this area.

The City's analysis of the soils and the peat deposits in and nearby to the Park identified "that high groundwater or peat conditions exist in some of the areas near Paramount Open Space and Twin Ponds Park". Unfortunately the City's consultant only viewed the study from the perspective of how difficult it will be to build over the peat soils (Otak, January 2016).

"Redevelopment of properties with peat-laden soils, high groundwater, and soils subject to liquefaction and the required engineering treatments and mitigations to address these conditions typically would be more expensive than redevelopment of properties without these conditions."

The study done by Otak did not include an analysis of what the impact would be to groundwater and groundwater recharge is the peat soils were removed or compacted. This is a huge error on the City's part because construction that disrupted these soil deposits could cause dewatering of the wetlands and/or streams in the Park. There is NO discussion of this aspect of the problem anywhere in the DEIS or Staff reports. The geotechnical report only includes borings outside of the areas that would be of interest from a wetland and stream dewatering perspective.

### **Discussion.**

If the City is waiting for redevelopment projects to perform site-specific geotechnical and wetlands studies, how do they propose they can make decisions on whether or not the rezone is even feasible or desirable now?

The City has failed to accurately map the wetlands within – and adjacent to, the Park so that potential impacts to critical areas (wetlands, streams, liquefaction zones) as a result of converting the single family residences to high density multi-family units, is great. I can guarantee, based on my site

## Attachment J - Comments on Addendum to DEIS

visit, that there are more wetlands along the eastern and southwestern sides of the Park that were NOT included in the Otak reconnaissance. At the very least the older on-record 6.9 - acre delineation should be used by the City when evaluating the rezone. It would be more accurate for a new delineation to be done, (and not in August at the driest time of year) at least along the eastern edge of the Park. At the very least, this should include the lots along the western edge of 12<sup>th</sup> Ave NE, including Lots (Figure 6): 15104 south to 1113 and lots 1117, 1123, 112014849, 1123, 14829, 14823, 14815, 14811, 14729, 14721, 14719, 14721, 14534, and 14528, (Figure 6). It would also be important to assess the channel that is aligned with the back of Lots 14652, 14646, 14640, 14634, 14612, 14604, 1460?, 93?, and 927.

Failure to map the Soils and Geology in the Paramount Open Space area and also to include an analysis on these features in the potential impacts that could occur as a result of the rezone, is a huge problem with the City's ability to develop an informed decision about the potential impacts that may occur as a result of the rezone. The City cannot wait till a "future time" to do these studies. As discussed above, there are known peat deposits and high groundwater conditions in and around Paramount Open Space though the extent and exact location are not known. It is a well accepted fact that soil compaction in peat soils and paving (impervious surface) reduces infiltration and storage capacity of soils, which in turn lessens groundwater recharge and base flow in streams. It would be very detrimental to the wetlands within and adjacent to the Park as well as the water quality and the hydrologic regime of Thornton Creek through the Park and downstream. This is coupled by the fact that nowhere in any of the preliminary analyses did the City or their consultant look at the problem of peat soils and high groundwater with respect to dewatering the wetlands and streams. They only looked at the cost of constructing developments under these conditions. This is a huge error, and one that will result in unavoidable adverse impacts to critical areas within and adjacent to the Park.

There are numerous small tributaries throughout Paramount Open Space that are fed by this groundwater base flow. Any reduction in the buffer width allowed adjacent to the streams, or piping of the streams/drainages as a result of allowing higher density development; will in-turn reduce the base flow feeding these tributaries and subsequently Thornton Creek. Additionally, increased surface flow in streams as a result of increased impervious surface and less infiltration post-storm event can cause flooding and destroy aquatic and riparian habitat by eroding banks, incising the stream within the banks, and removing the riparian (stream-adjacent) vegetation. It can also cause a situation where rainfall exceeds infiltration and more water is carried in the streams and creeks than they can accommodate increasing the bank erosion/failure and creek channel incision. Development that occurs in conjunction with increased impervious surface and decreased buffer widths are KNOWN to cause increases in peak flows and runoff volumes downstream. It is clear that the City has NOT

## Attachment J - Comments on Addendum to DEIS

evaluated the repercussions of the changes that will occur if the neighborhood surrounding Paramount Open Space goes from single family residences to more multi-family residences with reduced buffers adjacent to the creeks and the wetlands. It is precisely at the time when you increase the number of units and people that you need to INCREASE the buffer widths to afford sufficient protection of the wetlands and Creeks and downstream receiving water quality for salmonids and other resident fish. Yet, the City is proposing to decrease the buffer widths? This makes no ecological sense and greatly increases the chances of catastrophic stream degradation; resulting in removal of riparian vegetation, channel incision causing dewatering of stream-adjacent wetlands, and flooding of adjacent properties that are already saturated and flood-prone during the winter. The City's Failure to correctly delineate the wetlands, creeks, and soils and model the effects of the increased impervious area will only exacerbate these issues.

Add to these projections the apparent change in climate and possible increase in rainfall (from Cliff Mass's blog from 3/1/16):

"At 1 PM today [March 1st], Seattle weather history was made. Seattle has received enough precipitation since October 1 to make it the wettest winter in Seattle history. The water year starts on October 1 and this makes a lot of sense here in the Northwest, since our summers are very dry and the real rain usually does not begin until mid to late October. October 1-March 1 encompasses our meteorological winter and is not an arbitrary period. "

And the problem of increased stream volume, flooding, bank erosion and failure and washing away of the riparian vegetation increases in severity. It is imperative that any projections of the effects of increased impervious surface in the sub-basin used for evaluating the potential impacts of changing the zoning, have to include climate change in the model.

There is little mention of Low Impact Design (LID) proposals included in the DEIS analysis which could help mitigate some of the increased density and impervious surface experienced in a higher density land use as proposed. These alternatives would be more expensive and unless required by the City would likely not be used by potential developers.

The Paramount Open Space Open Space and the adjacent neighborhood to the east is the largest remaining wetland area in Shoreline and the Thornton Creek Watershed (Tetra Tech 2004 and City of Seattle 2000). The overall wetland area has been mapped previously at approximately 6.9 acres. Little's Creek and the many tributaries in the Park constitute a relatively healthy riparian corridor. The Park has undergone many assaults over the years and there are certainly many areas that are invaded by weedy species, but with the restoration activity that has occurred in the southern half of the park, the Park is still a beautiful and healthy natural area. Historic habitat loss in the buffer areas surrounding the wetlands and streams in the Park is also problematic. There is upland area in the

## Attachment J - Comments on Addendum to DEIS

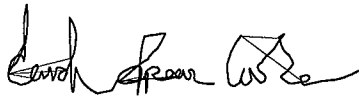
northwest corner of the park but upland habitat is at a premium in the Park. The buffer of the wetlands east of the Park is currently a large percentage of the available upland habitat in the area. Reducing the buffer widths in this area and allowing for high density construction along his edge of the large wetland system would be very detrimental to the backyard habitats and tree canopy that are now providing relatively high quality habitat for local bird and insect life.

And finally, "Since the Thornton Creek Basin within the City of Shoreline is the headwaters of the entire Thornton Creek Basin, the high percentage of impervious surface will affect the entire downstream watershed (Tetra Tech 2004)".

One of the options mentioned in the Agenda 6a LRSAP staff report is to "amend one of the potential zoning scenarios to exclude land near Paramount Open Space Open Space or Twin Ponds park from rezoning." This appears to be a much smarter alternative than opening the City to a series of expenses for studies and mitigation for preserving the integrity of the creeks and wetlands from the highly probably impacts of high density development and reduced buffers.

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

Sarah Spear Cooke



Professional Wetland Scientist and Fellow,  
Society of Wetland Scientists

mitigation for buffer impacts. Wetland Resources (2000) addressed this wetland in more detail and documented its size as exceeding one acre.

#### *Wetland F, Paramount Park*

This previously mapped wetland (WL-F) is in Paramount Park between 10th Avenue NE and 12th Avenue NE, just north of NE 145th Street. It is one of the larger wetlands in the City, at approximately 6.9 acres. This wetland is associated with Reach TC14, known as Little Creek, where a series of wetlands, ponds and connecting channels are present. Local volunteers have completed several wetland enhancement projects, including removing fill and planting native vegetation in the vicinity of the ponds and planting trees in a detention facility constructed by King County. Three wetland classes are present: forested, scrub-shrub and emergent. The description for Reach TC14 provides additional information on this wetland.

#### *Wetland G, Thornton Creek 13*

This previously mapped wetland (WL-G) is adjacent to TC13 near North 179th Street and 21st Avenue North. During surveys for the stream inventory, this reach was not found to have water or natural substrate. However, on October 26, 2001, the area in the northeast corner of the N 178th Street and N Meridian Avenue intersection was found to have small pockets of standing water. The area is forested with sparse herbaceous or shrub cover. Dominant trees included red alder, willow, and cedar. Spiraea, salmonberry, lady fern, horsetail and creeping buttercup were also present. The total area is approximately 0.4 acres. This wetland is a palustrine forested wetland. It is confined on all sides by roads or homes and is very small.

Jones and Stokes (1990) described and delineated this wetland in 1990. They described stormwater as entering the site through a 12-inch corrugated metal culvert at the southeast corner of the site and exiting the wetland through another culvert at the corner of North 178th Street and Meridian Avenue.

#### *Wetland H, Ronald Bog*

Ronald Bog (WL-H) is a open water/wetland complex occupying approximately 7.7 acres. The wetland portion around the edge occupies approximately 1 acre. Otak (December 2001) conducted a detailed wetland study of Ronald Bog and addressed the individual wetland types. The following descriptions are from the Otak report:

"Wetland 1 is a palustrine forested wetland of approximately 0.8 acres in size, located along the inflow corridor that enters Ronald Bog from the northeast. The open water course flows due south, carrying stormwater discharge from 175th Street. The riparian corridor is dominated by red alder (*Alnus rubra*) trees, with a mixed shrub component of non-native Himalayan blackberry (*Rubus procerus*) and salmonberry (*Rubus spectabilis*). Where the ditch widens, the stream drops its bed load and a non-vegetated mud flat is present. The forest in this area is red alder and black cottonwood (*Populus balsamifera*) with some willow (*Salix spp.*) in the understory. Groundcover is sparsely vegetated with giant horsetail (*Equisetum telmateia*), creeping



*Thornton Creek Reach 14*

Thornton Creek Reach 14 (TC14) runs as Littles Creek through Paramount Park, where a series of wetlands, ponds and connecting channels occur. Most of the data collected at this palustrine open water course indicated ratings of good or fair. Riparian species were immature native conifers or hardwoods, bank condition was good due to sufficient bank vegetation and sparse armoring, and pool frequency was fair. Gravel and quarry spalls were present in the lower end of the reach. Benthic invertebrate diversity was rated poor. Overall, this reach is one of only three reaches in the City given a fair rating. \*

Paramount Park contains a diverse vegetation community, including watercress in portions of the stream and red elderberry, red osier dogwood, Indian plum, skunk cabbage, hardstem bulrush, slough sedge and a variety of ferns in the wetland and riparian corridor.

Beginning at 12th Avenue NE, the stream flows west out of a pipe, turns south as it enters the eastern edge of Paramount Park Open Space, splits, and flows south in two channels. The east channel, including flow from Wetland WL-I through a short segment of open water course, crosses beneath a pedestrian trail in a culvert that allows fish passage. It then enters a pond, seeps into a wetland, enters a second pond, and reconnects with the west or main channel (Littles Creek).

The two ponds were constructed by local volunteers to enhance the wetlands under a Water Quality Block Grant awarded by King County Department of Natural Resources. In addition, the volunteers cleared invasive plant species, planted native vegetation, placed large wood in the ponds and along the stream courses, and established an interpretive trail emphasizing the importance of water quality and wetlands. These volunteers diverted the flow from an old King County detention facility into a constructed channel to feed the wetland ponds. Small channels connect each pond with both channels.







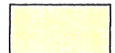
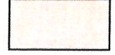
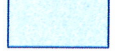



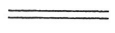


The west channel, which is Littles Creek proper, flows west through a City-owned drainage tract with landscaping and property improvements on each side. This section is prone to flooding. The west channel then turns south and enters Paramount Park. It enters a wetland and then crosses beneath the pedestrian trail via a culvert. It continues south until it reconnects with the east channel.

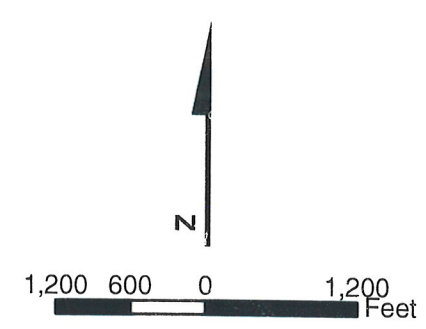
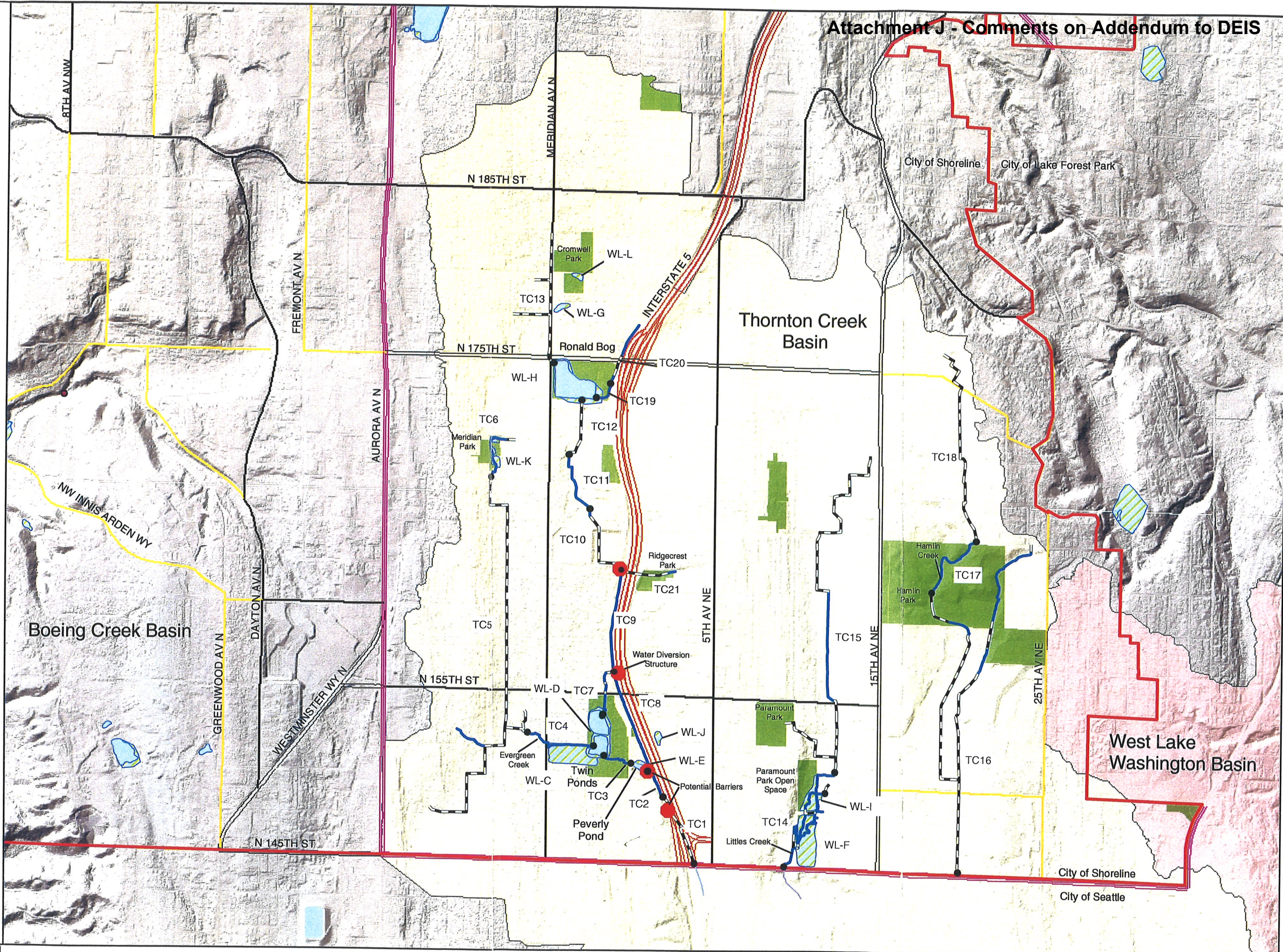
*Thornton Creek Reach 15*

Thornton Creek Reach 15 (TC15) extends from North 150th Street to a detention pond at North 170th Street and 15th Avenue NE. A piped segment drains the Paramount Park playfield. It is alternately piped and channelized. Because the piped portion is longer than the open water course portion, this reach was mapped as a piped water course.

*Thornton Creek Reach 16*

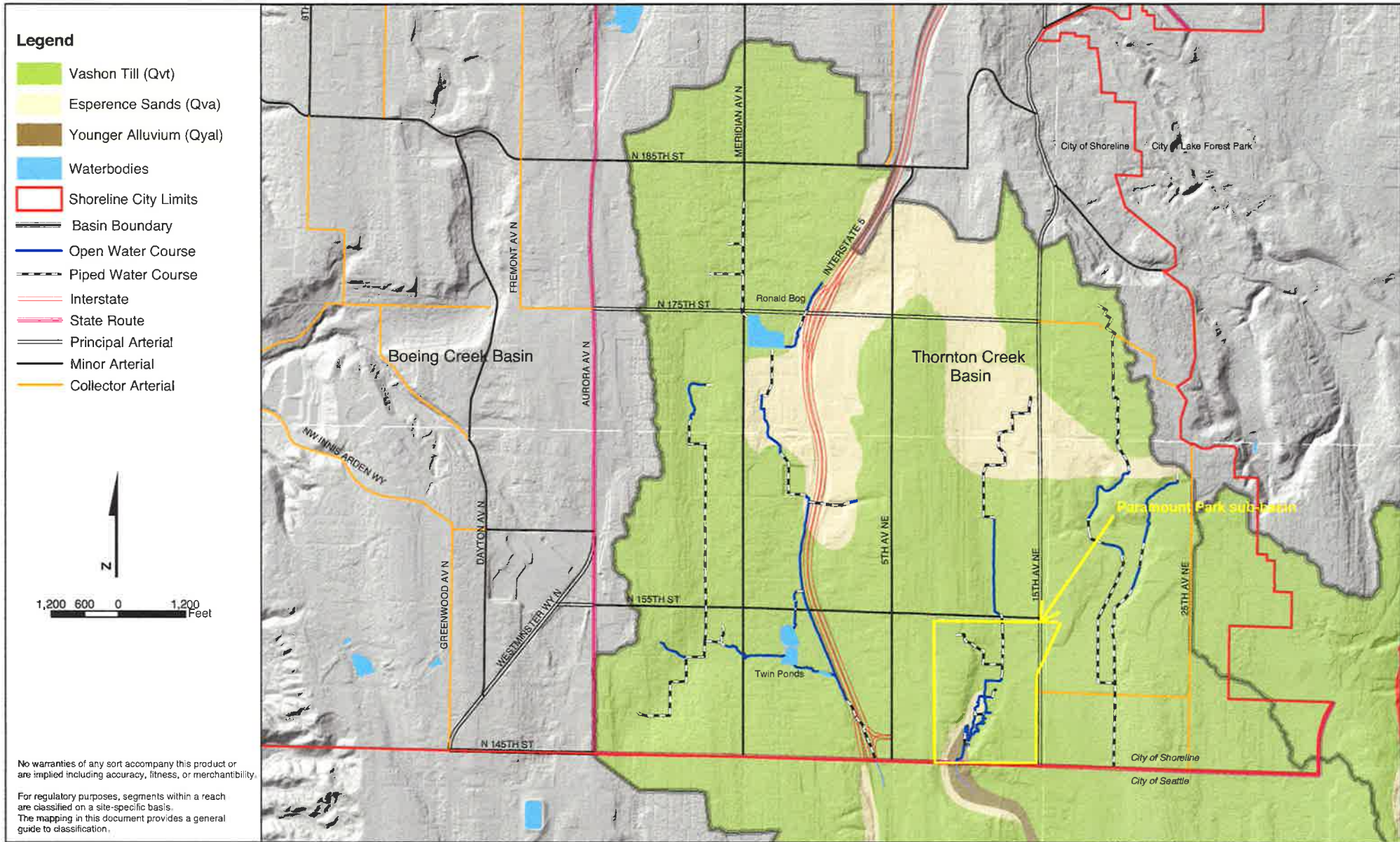
Thornton Creek Reach 16 (TC16) is east of 15th Avenue NE. Two primarily piped branches extend from Hamlin Park, join north of NE 150th Street and continue past the Shoreline City limit at NE 145th Street to join the main Thornton Creek system. There is a small portion of open water course along this reach. Because of the preponderance of piping, this reach was mapped as a piped water course.

- Legend**
-  Open Water Course
  -  Piped Water Course
  -  Wetlands
  - WL-C Wetland ID
  -  Parks
  - TC1 Reach ID
  -  Reach Starting Point
  -  Fish Passage Barrier
  -  Thornton Creek Basin
  -  W. Lake Washington Basin
  -  Waterbodies
  -  Shoreline City Limits
  -  Interstate
  -  State Route
  -  Principal Arterial
  -  Minor Arterial
  -  Collector Arterial



No warranties of any sort accompany this product or are implied including accuracy, fitness, or merchantability.

For regulatory purposes, segments within a reach are classified on a site-specific basis. The mapping in this document provides a general guide to classification.



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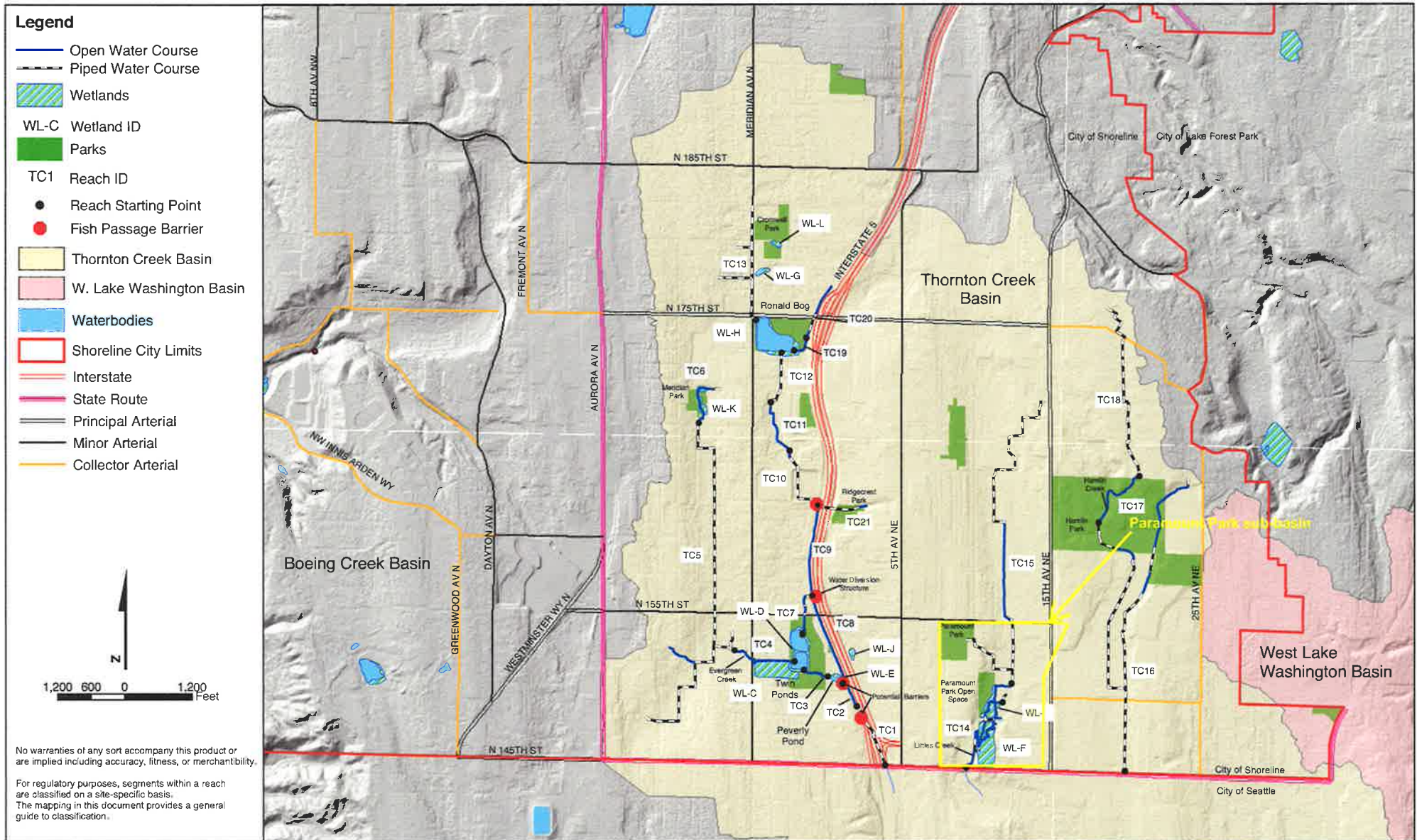
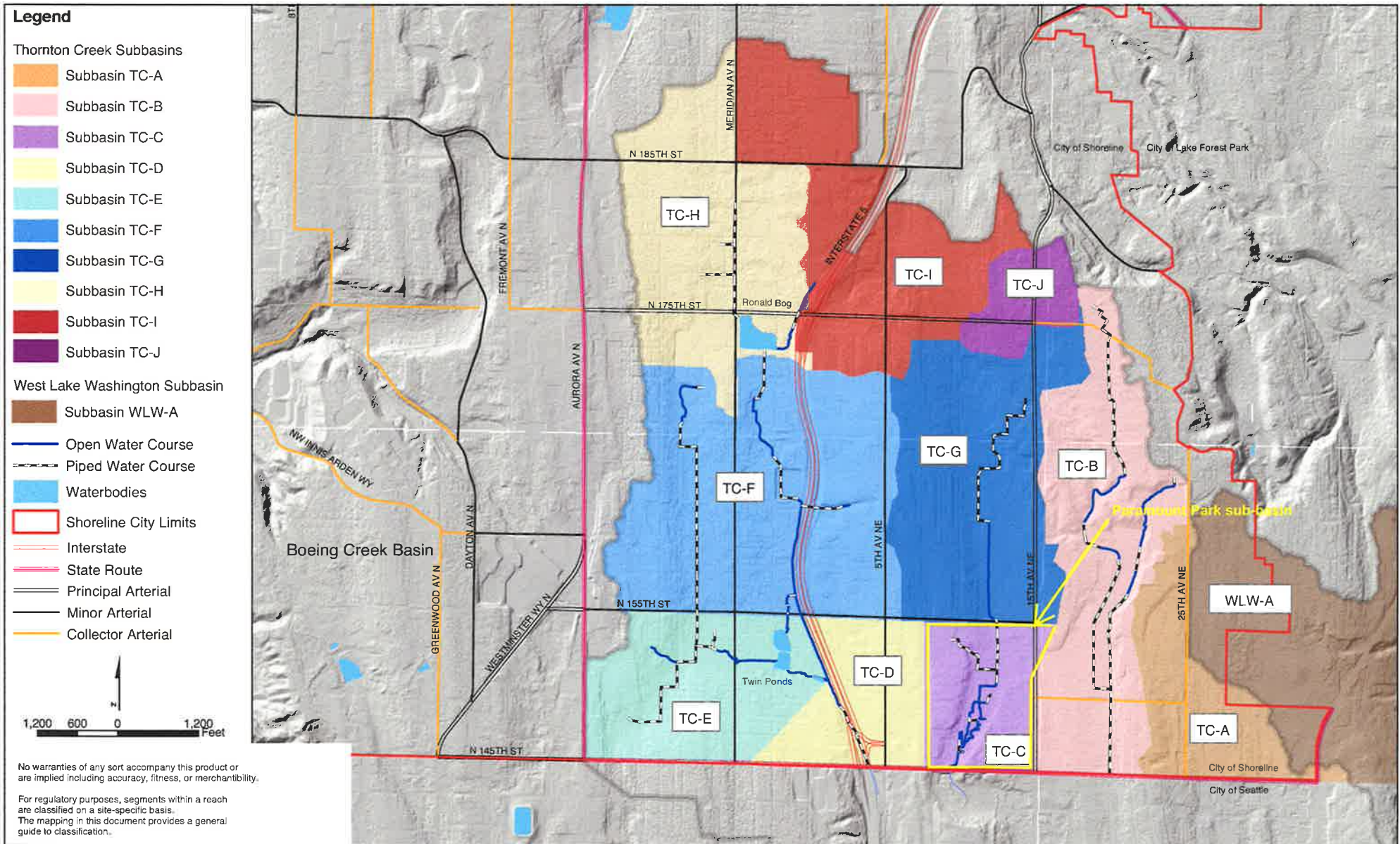
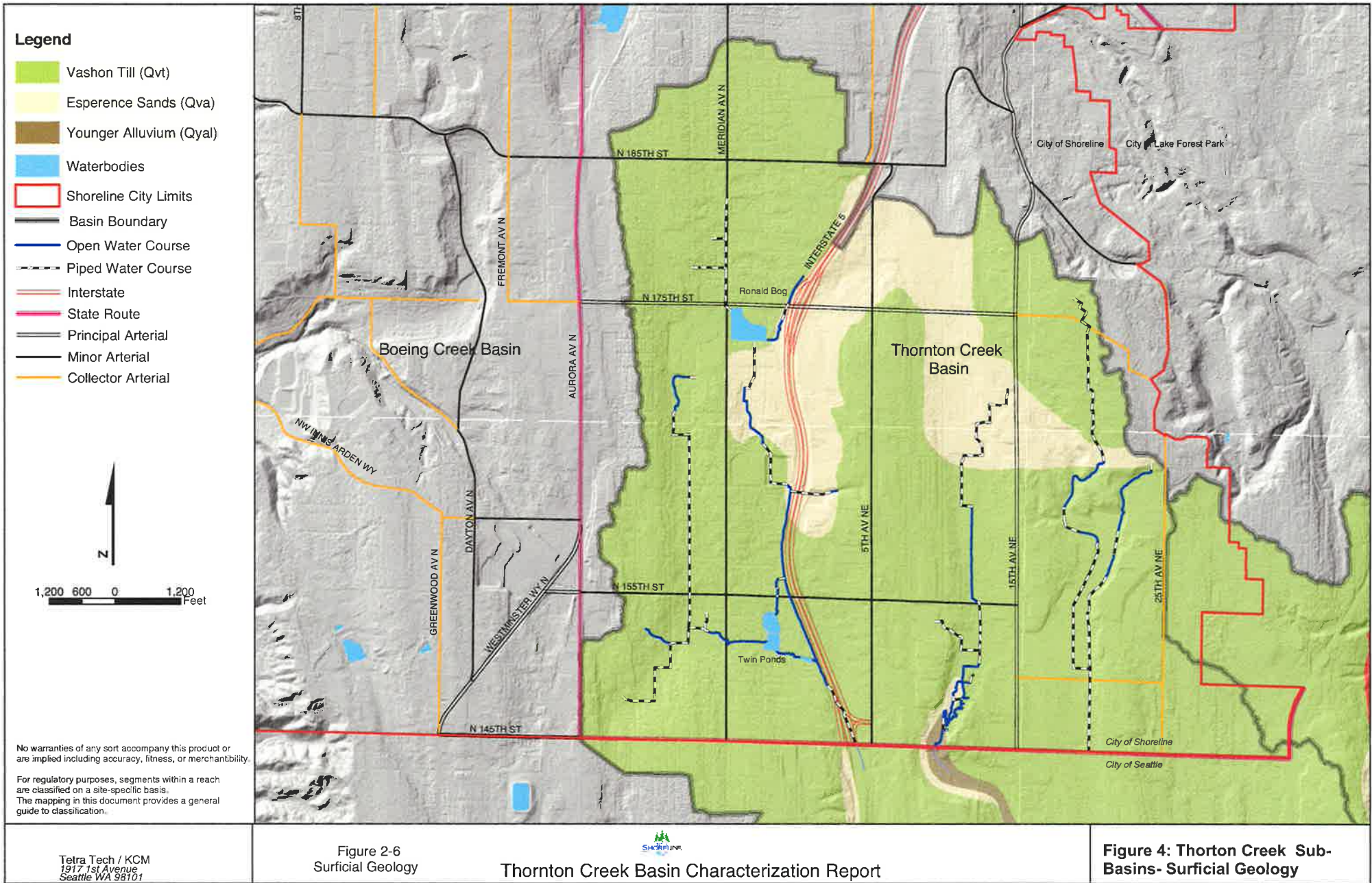


Figure 2-3  
Stream Reaches, Wetlands  
and Fish Passage Barriers

Figure 2: Thornton Creek Wetlands  
and Streams





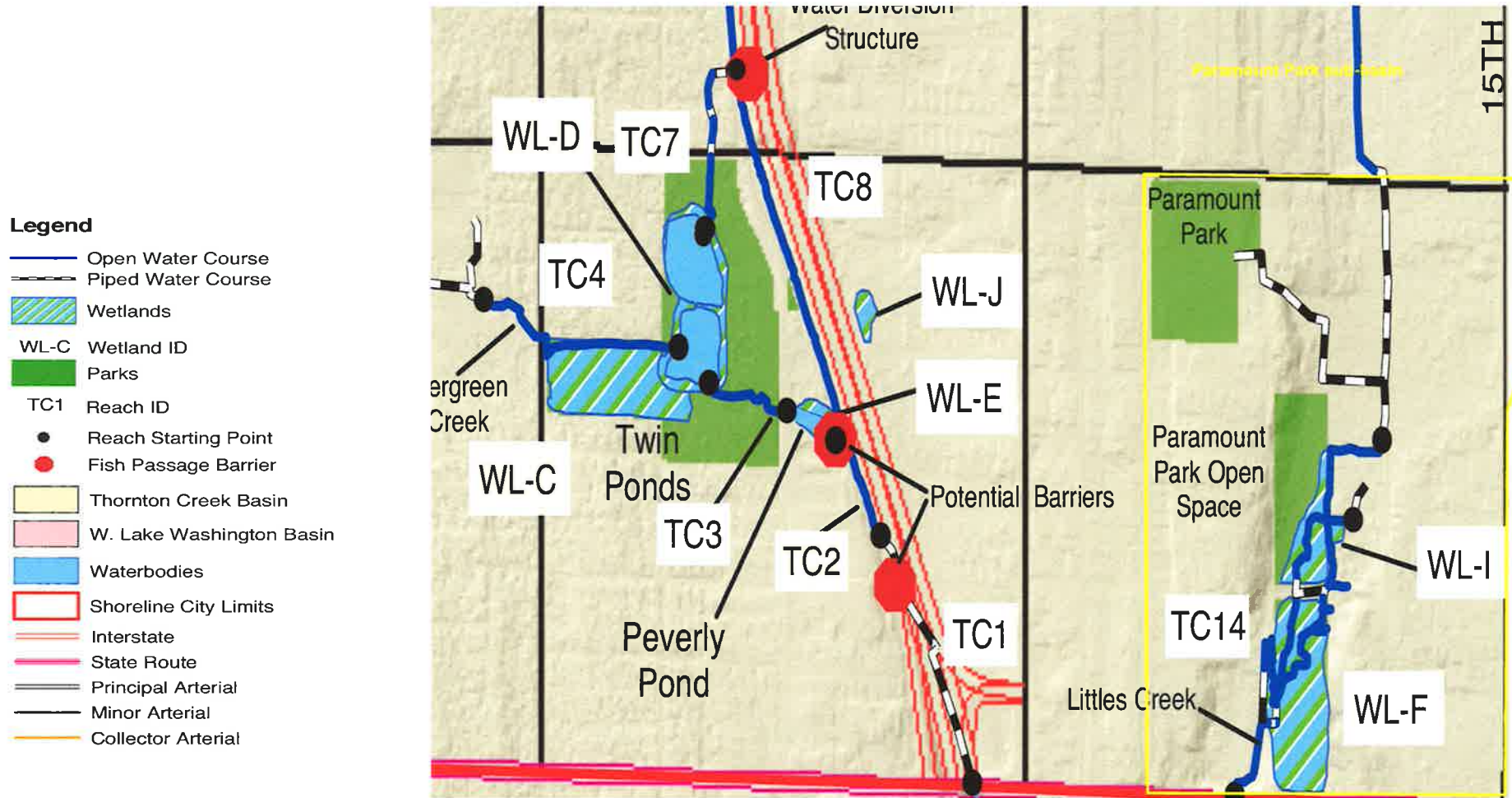


Figure 5: Twin Ponds and Paramount Park Wetlands and Streams

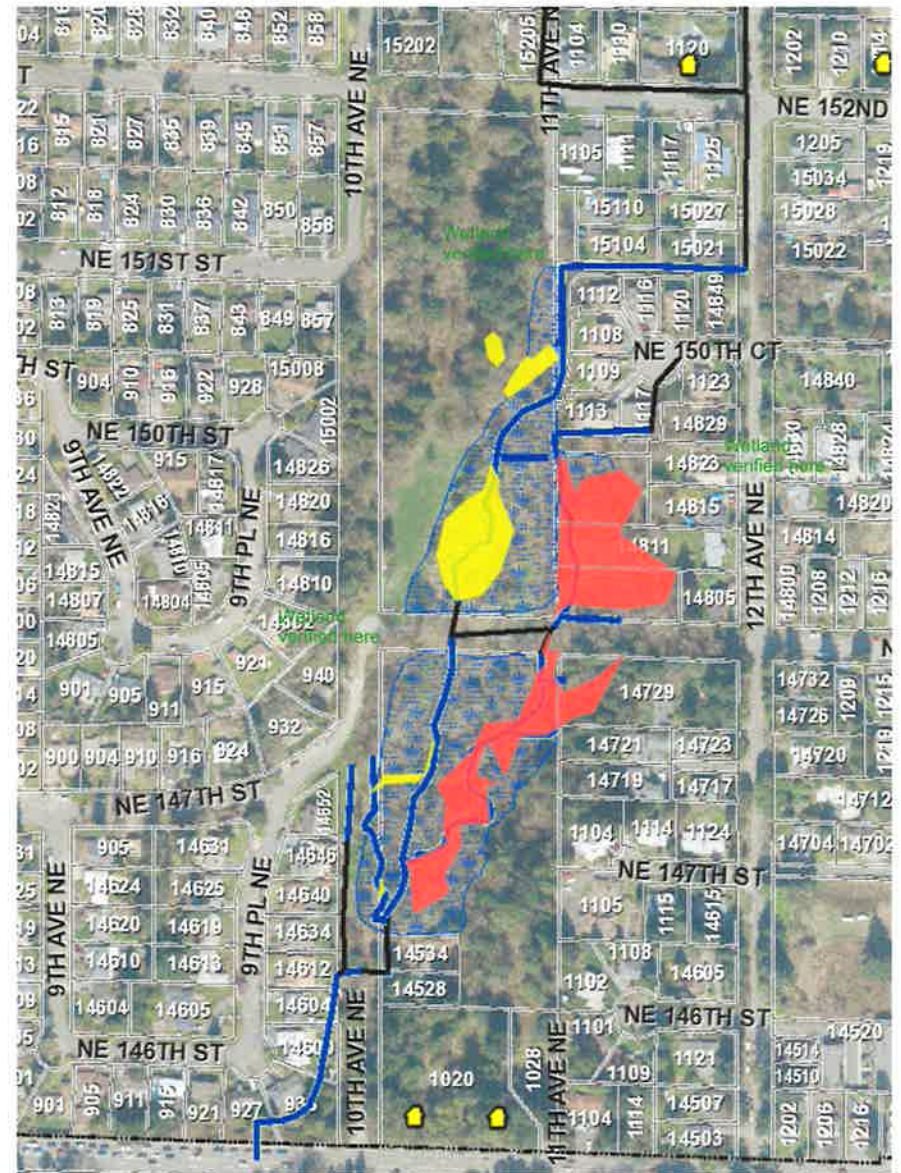
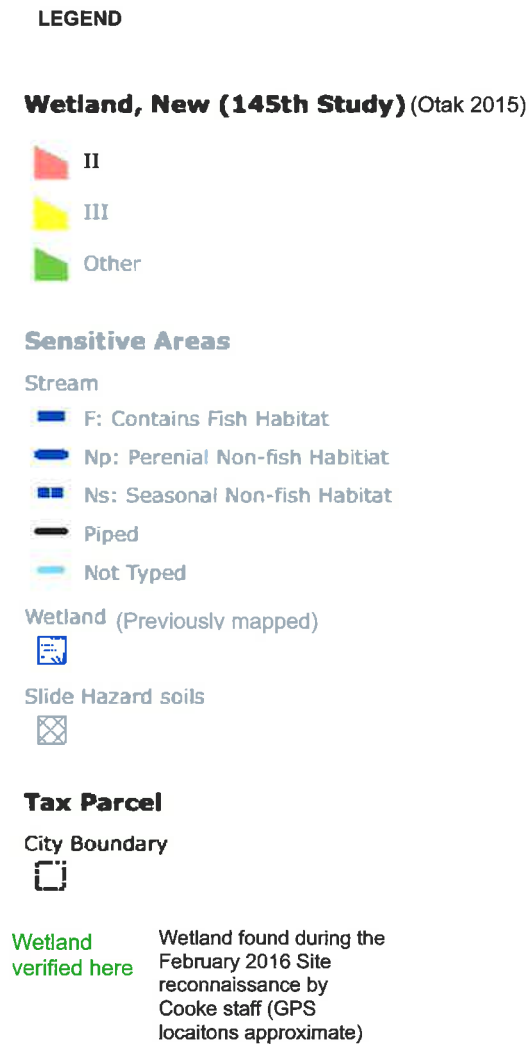


Figure 6: Paramount Park Wetlands and Streams Mapping. City of Shoreline GIS 2016.



**Figure AW-1**  
**Critical Areas - Paramount Park**  
 Critical Areas Memorandum  
 Draft Environmental Impact Statement  
 145th Street Station Subarea Plan  
 City of Shoreline, WA

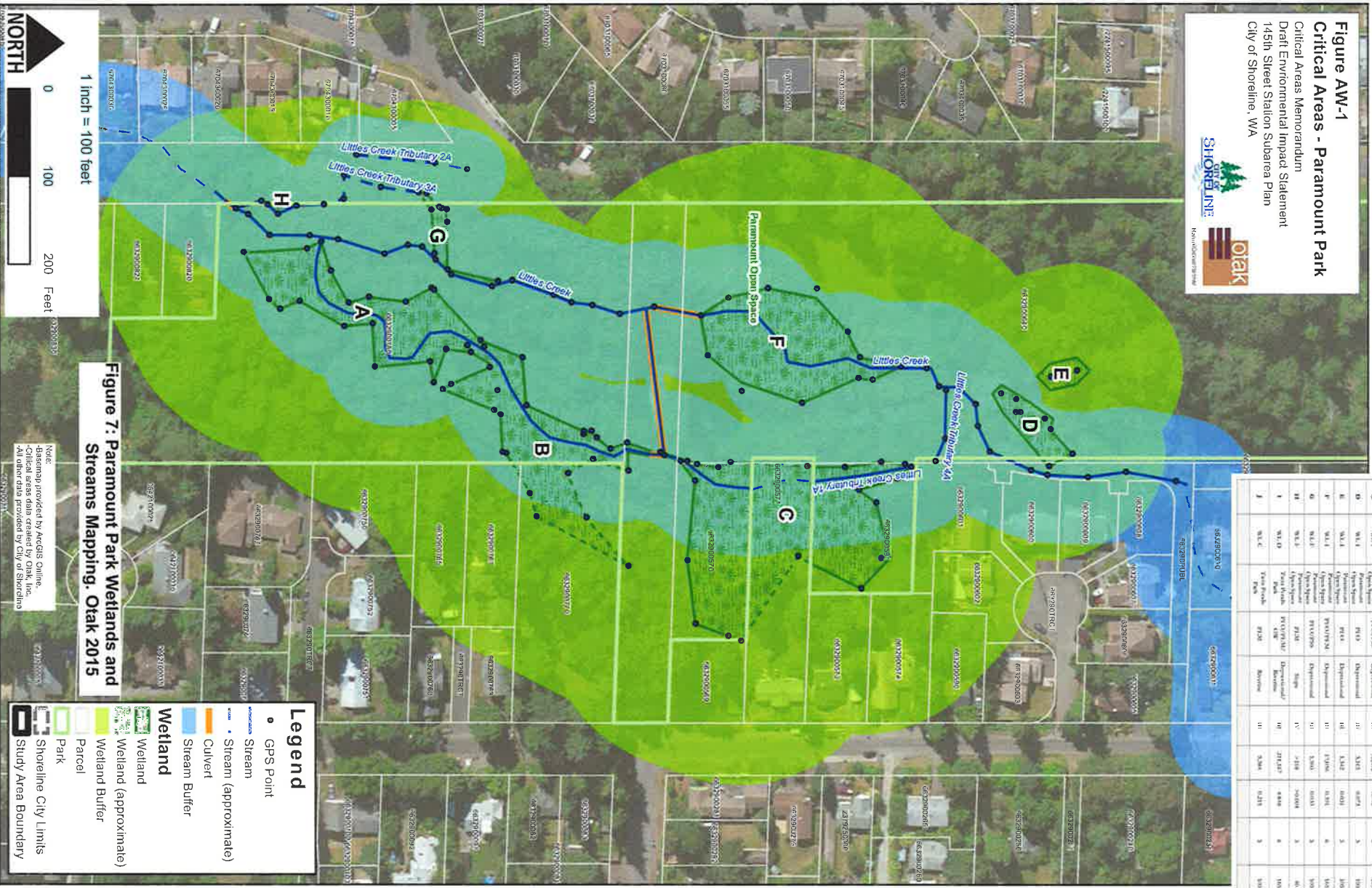


Table 1 - Wetland Locations, Classifications, Categories, Size, and Buffers

Wetland	Wetland Designation	Location	Wetland Classification and Category	City of Shoreline	Wetland Size	Wetland Buffer	Wetland Buffer Mapping	Wetland Buffer
Wetland	Wetland Designation	Location	Wetland Classification and Category	City of Shoreline	Wetland Size	Wetland Buffer	Wetland Buffer Mapping	Wetland Buffer
A	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
B	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
C	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
D	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
E	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
F	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
G	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
H	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
I	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10
J	W.L.C.	Paramount Park	Wetland	Wetland	10	10	10	10

**Figure 7: Paramount Park Wetlands and Streams Mapping, Otak 2015**

Note:  
 -dataset provided by ArcGIS Online.  
 -Critical areas data created by Otak, Inc.  
 -All other data provided by City of Shoreline

**Legend**

- GPS Point
- Stream
- Stream (approximate)
- Culvert
- Stream Buffer
- Wetland
- Wetland (approximate)
- Wetland Buffer
- Parcel
- Park
- Shoreline City Limits
- Study Area Boundary



Figure 8. Paramount Open Space CSS Site Visit Photo Locations 2016

## Attachment J - Comments on Addendum to DEIS



P1 Lawn part of Wetland WL-1.jpg



P2 car park looking north at Wetland WL-1.jpg



P3 blackberry patch overlying wetland.jpg



P4 upland .jpg

## Attachment J - Comments on Addendum to DEIS



P5 path hedged north through the park..jpg



P6 upland typical.jpg



P7, Wetland in lawn on lot.jpg



P8 tributary and associated wetlands.jpg

Attachment J - Comments on Addendum to DEIS



P9 Tributary tuning corner.jpg



P10 park sign upland.jpg



P11 tributary in ditch along road.jpg



P12 wetland at back of residence.jpg

**Attachment J - Comments on Addendum to DEIS**



**P13 wetland at back of property.jpg**



**P14 wetland on next property north.jpg**



**P15 wetland extends to outbulding on lot.jpg**



**P16 wetland downhill of road fill.jpg**

**Attachment J - Comments on Addendum to DEIS**



**P17 tributary into pipe under road and south to restoraitn area.jpg**



**P18, wetland in lawn area , part of WL-1.jpg**



**P19 wetland continues north.jpg**



**P20 tributary from P7 .jpg**

Attachment J - Comments on Addendum to DEIS



Pond and restoraiotn area WL-2.jpg



Pond and restoraton area.jpg



P23 Little Creek continues south through restoraiton areaa.jpg



P24 Pond .jpg



## Attachment J - Comments on Addendum to DEIS



P21behind lot 14652.jpg



P22 fence of Lot 14646.jpg



P25 Littles creek heads south.jpg

## Attachment J - Comments on Addendum to DEIS

Thornton Creek Alliance  
Post Office Box 25690  
Seattle, Washington 98165-1190

March 21, 2016

Ms. Rachael Markle  
Director, Planning and Community Development  
City of Shoreline  
17500 Midvale Avenue North  
Shoreline, WA 98133

Re: Comments on Preferred Alternative, DEIS, and Addendum for NE 145<sup>th</sup> St. Station Subarea Plan

Dear Ms. Markle:

This letter follows up comments that Thornton Creek Alliance submitted to you in an earlier letter on the NE 145<sup>th</sup> St. Station Subarea Plan on January 29, 2016, and related testimony that we provided at the Shoreline Planning Commission meeting on March 17, 2016. This letter identifies specific concerns that we have about the Draft Environmental Impact Statement for the plan, the Addendum to the DEIS submitted by OTAK Inc. on January 29, 2016, and the Preferred Alternative that the Planning Commission may recommend for inclusion in the Final Environmental Impact Statement.

### *Draft Environmental Impact Statement*

The DEIS certainly needed an addendum regarding environmental impacts. Chapter 3.5, on “Parks, Recreation, Open Space, Natural Areas and Priority Habitat Areas” is almost entirely focused on recreational needs for parkland. The analysis of habitat impacts essentially presumes that the critical area ordinance is sufficient to protect against all potential impacts of denser zoning. Despite the statement on page 3-185 that “Areas of urban forest are more vulnerable to potential impacts associated with redevelopment in the subarea,” the DEIS provides no analysis of these impacts beside recounting the provisions of the City’s critical area ordinance and referencing stormwater regulations, before concluding on page 3-188 that the development alternatives being reviewed would have “no significant unavoidable adverse impacts” to “open space...and sensitive natural areas and resources.”

The Washington Department of Ecology is more skeptical about the ability of its own stormwater management regulations to protect against degradation:

## Attachment J - Comments on Addendum to DEIS

Ms. Rachael Markle

March 21, 2016

Page Two

Ecology understands that despite the application of appropriate practices and technologies identified in this manual, some degradation of urban and suburban receiving waters will continue, and some beneficial uses will continue to be impaired or lost due to new development. This is because land development, as practiced today, is incompatible with the achievement of sustainable ecosystems. Unless development methods are adopted that cause significantly less disruption of the hydrologic cycle, the cycle of new development followed by beneficial use impairments will continue. [Western Washington Stormwater Manual, Volume I, Minimum Technical Requirements, December 2014, p.1-24]

We would also point to the research of University of Washington Professor John Marzluff, whose book Welcome to Subirdia: Sharing Our Neighborhoods with Wrens, Robins, Woodpeckers and Other Wildlife summarizes decades of his and others' research, which points to the surprising conclusion that the highest diversity of birds can generally be found in suburban neighborhoods (with zoning no denser than the R-6 now in place in most of the 145<sup>th</sup> St. Subarea) adjacent to forested reserves (such as Paramount Open Space, South Woods, Hamlin Park and parts of Jackson Park). Diversity in these areas can be higher than in large, protected natural areas because collectively they provide more diverse habitats, the bird feeders and nesting boxes found in suburban gardens meet real needs of birds at different stages of their lives, and the tree canopy in traditional suburban neighborhoods extends the benefits of adjacent forested reserves. This is an aspect of urban and suburban development not accounted for by critical area regulations, which do not focus at this larger, landscape level.

### *OTAK Addendum*

The Addendum to the DEIS provided by OTAK looks in much greater detail at the streams and wetlands in Paramount Open Space and Twin Ponds Park (although we believe the critique of the Addendum submitted to the City by Cooke Scientific on behalf of the Shoreline Preservation Society raises many valid points of concern about this detail). The Addendum continues to presume that critical area regulations are sufficient to protect habitat values even against much denser adjacent development, to the point that it argues that habitat values will see a net benefit from much denser development, since existing legal nonconforming uses would be replaced by new development that must be further away from streams and wetlands to comply with current regulations. Again, the Addendum does not consider larger landscape aspects of redevelopment, which would gradually replace the current matrix of suburban habitats in-between natural area reserves with more and more hardscape. This transformation would, according to Professor

## Attachment J - Comments on Addendum to DEIS

Ms. Rachael Markle

March 21, 2016

Page Three

Marzluff's research, reduce the bird diversity found in both the developed landscape and the reserves, since many bird species regularly move between both.

We would also note that Figure AW-1 in OTAK's report, "Critical Areas – Paramount Park," does not, in fact, seem to substantiate the report's claim that there are currently structures actually located in the wetlands that extend out from the park. Certainly no houses appear to be in the wetlands. There are six houses along 12<sup>th</sup> Avenue Northeast that are within wetland buffers, but in five of these cases all or essentially all of the parcel is inside the buffer and in the other case far too little of the parcel is outside the buffer to be developable. This means that reasonable use requirements would almost certainly still

allow redevelopment inside the buffer. Even at the parcel level, then (let alone the landscape level that OTAK ignores), the report is misleading at best, and mostly appears to be simply wrong regarding the impacts of redevelopment on habitat.

### *Preferred Alternative*

As stated in our testimony on March 17, Thornton Creek Alliance recommends the following for the City's Preferred Alternative:

- The Compact Communities alternative, vs. Connected Corridors;
- A phased approach that focuses initial redevelopment closer to the Sound Transit station;
- Inclusion of the "Green Network" of pedestrian and bicycle pathways through the Subarea, at least to connect with and complement the Off Corridor Bicycle network; and
- A Critical Areas Overlay (which would include buffers for steep slopes and geologically hazardous areas in addition to streams and wetlands), which would require that any new development under the updated zoning standards must be completely outside of critical areas and their buffers.

We also support Planning Commissioner Montero's suggestion that the area immediately east of Paramount Open Space and south of Paramount Park be placed in the MUR-35 zone and be prioritized for future acquisitions that would better tie the two green spaces together. The undeveloped and completely forested parcel at 14729 12<sup>th</sup> Ave NE, immediately south of the City's street end at NE 148<sup>th</sup> St., is another obvious candidate for acquisition, especially since it includes substantial wetland areas.

Lastly, we want to reiterate our interest in the other recommendations made in our January 29 letter concerning preservation of vegetation, use of green infrastructure, restoration within

## Attachment J - Comments on Addendum to DEIS

Ms. Rachael Markle

March 21, 2016

Page Four

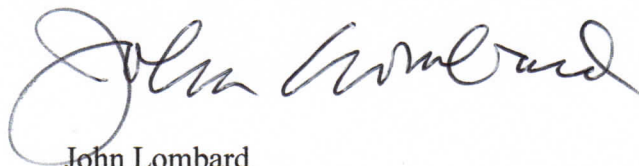
Paramount Open Space, and requirements for wildlife-friendly features in new developments under the updated zoning.

Thank you for the opportunity to comment on the NE 145<sup>th</sup> rezone. If you have questions about our comments, please contact TCA board member John Lombard, at [jlombardwriter@gmail.com](mailto:jlombardwriter@gmail.com) or 206-788-6443.

Sincerely,



Ruth Williams  
President



John Lombard  
Board member

cc: Shoreline Planning Commission

**THORNTON CREEK ALLIANCE** (TCA), founded in 1993, is an all-volunteer, grassroots, nonprofit organization of 140 members from Shoreline and Seattle dedicated to preserving and restoring an ecological balance throughout the Thornton Creek watershed. Our goal is to benefit the watershed by encouraging individuals, neighborhoods, schools, groups, businesses, agencies, and government to work together in addressing the environmental restoration of the creek system including: water quality, stabilization of water flow, flood prevention, and habitat improvement through education, collaboration, and community involvement.



[www.thornton-creek-alliance.org](http://www.thornton-creek-alliance.org)

[www.facebook.com/Thornton.Creek.Alliance](https://www.facebook.com/Thornton.Creek.Alliance)

## Attachment J - Comments on Addendum to DEIS

January 21<sup>st</sup> 2016 Planning Commission Public Hearing

Thank you for taking public comment tonight.

As Secretary of Shoreline Preservation Society I have been authorized by the Board of Shoreline Preservation Society to speak on its behalf.

Shoreline Preservation Society requests Legal Standing and to be noted as a party of record in this public hearing concerning the proposed Development Regulations that apply to Light Rail Systems Facilities.

We advocate that the Public Hearing for the Type C Special Use Permit Process be conducted ~~either~~<sup>to</sup> by the Planning Commission ~~of~~ the City Council as both bodies are more accountable to the community than a Hearing Examiner.

Staff has made a list of existing development regulations that would apply to the design of light rail systems/facilities. The Planning Commission wisely requested more information regarding the Adequacy of Public Facilities and Engineering and Utilities Development Standards.

In the staff report I read notations about making sure the existing water supply system, surface water management system, and streets are sufficient to meet the needs of the Transit system. Concern for Tree conservation is also noted. There are notes that if there are inadequacies that the City will require Sound Transit to pay for the necessary upgrades.

Regarding Trees: In the last Planning Commission meeting it sounded like the city was preparing to trade trees for something. The point is we aren't trying to upgrade from trees to pavement. We have an investment in trees and if Shoreline can't get Sound Transit to pay for replacements, the city should add the replacements itself. A lot of these trees are in the freeway right of way and the future track will decimate a lot of them. While Shoreline has gotten the visual and environmental value from them previously, we should be increasing our stock somewhere else in Shoreline.

With regard to surface water management the City Staff has already determined through spot testing that our current system is grossly inadequate.

This raises the question of whether Sound Transit can be made to pay for existing deficiencies in the Surface Water System over and above what would be required to upgrade the system to what is needed? I understand

## Attachment J - Comments on Addendum to DEIS

that it is not legal for a developer to be required to pay for existing system deficiencies when doing a development. They are only required to pay for the upgrades needed to support the future use post redevelopment. Please ask staff to determine if the same is true with regard to working with Sound Transit.

This all speaks to the need to assess the current condition of the existing infrastructure. It speaks to the need to collaborate with utility providers and indeed collaboration with utilities is mentioned in the Staff brief. It speaks to the need to determine ahead of time what the costs will be and who will pay.

Shoreline Preservation Society would like to point out that project level Capital Facilities Planning was missing from the 185<sup>th</sup> Street Rezone in addition to a project level Environmental Impact Statement.

If the Planning Commission and staff were to invest the time it takes to do project level Capital Facilities Planning for the Light Rail system but also for the 145<sup>th</sup> Street area prior to considering any rezoning two things will be accomplished:

- You will make it possible to plan for change effectively while minimizing disruption to the existing residents and the environment
- You will make it possible to provide the infrastructure needed for that change that includes a plan for how to pay the associated costs

On a personal note, I live on the top of a hill. Tonight I discovered ground water seeping up into our home. If I am having issues where I live, how much more of a challenge will it be for handling surface water along the Sound Transit Track in what used to be a stream bed? I hope the City plans to finish examining the Surface Water system in great detail within the Sound Transit footprint and in the two-rezone areas.

Thank you for your time and consideration, and thank you for listening.

