

From: [City Council](#)
To: [Chris Roberts](#); [Debbie Tarry](#); [Doris McConnell](#); [Heidi Costello](#); [Jesse Salomon](#); [John Norris](#); [Keith McGlashan](#); [Keith Scully](#); [Shari Winstead](#); [Will Hall](#)
Subject: FW: Thornton Creek Alliance Comments on NE 145th Subarea Plan
Date: Friday, September 09, 2016 3:17:41 PM
Attachments: [TCA Letter Shoreline 145th Subarea Plan Final136.pdf](#)

9/12 Meeting – Comments on Item 8(a) – This will be added as a green folder item.

cw

From: John Lombard [mailto:jlombardwriter@gmail.com]
Sent: Thursday, September 08, 2016 10:23 PM
To: City Council
Cc: Miranda Redinger; Juniper Nammi
Subject: Thornton Creek Alliance Comments on NE 145th Subarea Plan

Dear Councilmembers:

Attached are Thornton Creek Alliance's comments on the Planning Commission's recommendations for the NE 145th St. Station Subarea Plan. We believe the area adjacent to Paramount Open Space that remains R-6 should be expanded from the now much reduced area recommended by the Commission. The same logic that the Planning Commission uses should also include the area between 10th Ave NE and 9th Pl NE and NE 145th St and NE 147th St. At a minimum, we believe the area with steep slopes to the north of Paramount Space should also remain R-6.

I look forward to testifying on these same matters at your study session on September 12. Thank you for your consideration.

John Lombard
Thornton Creek Alliance

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



September 8, 2016

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

Re: Comments on Planning Commission Recommendations for NE 145th St. Station Subarea Plan

Dear Councilmembers:

Thornton Creek Alliance is disappointed by the sharp reduction in continued R-6 zoning adjacent to Paramount Open Space in the Planning Commission's recommendation for the 145th Street Station Subarea Plan. We are also disappointed in the Final Environmental Impact Statement's complete disregard of the research by University of Washington Professor John Marzluff on the habitat value of traditional suburban zoning around protected open spaces that we submitted repeatedly earlier this year. We believe the FEIS' analysis of the role of critical area regulations is inaccurate with regard to most redevelopment that might occur near Paramount Open Space. We ask for a return to the Planning Commission's earlier recommendation for continued R-6 zoning to the north and south of Paramount Open Space and an expansion to include most or all of the parcels between 10th Avenue NE and 9th Place NE and between NE 145th and NE 147th Streets. This expansion follows the Planning Commission's own logic of continuing R-6 where all or most of parcels are within critical areas or their buffers.

We do not request returning to the Planning Commission's earlier recommendation for continued R-6 zoning along the southern edge of Paramount Park (as distinct from Paramount Open Space) or along the entire southern edge of Twin Ponds Park. These areas are not crucial to the habitat values of these parks. We also appreciate the Council's previously expressed interest in phasing the Subarea Plan so that the rezoning adjacent to Paramount Open Space would not occur until 2033.

We wish to reiterate the crucial point made in Professor Marzluff's book, Welcome to Subirdia: Sharing Our Neighborhoods with Wrens, Robins, Woodpeckers and Other Wildlife, 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 145th 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. Professor Marzluff's book summarizes decades of his own and others' research.

We submitted these comments on the Draft Environmental Impact Statement, but they were ignored in the FEIS, which simply claimed, "There is no known research that indicates that mixed use residential or multifamily uses would result in a greater level of impact to nearby streams and wetlands than single family uses." (p.3-204) The report by Norman Wildlife Consulting that we submitted on January 29, 2016, to both the Planning Commission and the Council confirmed 42 species of birds in and around Paramount Open Space, including bald eagles; Cooper's, sharp-shinned and red-tailed hawks; great horned and barred owls; downy, hairy and pileated woodpeckers; California quail; and band-tailed pigeons. The report noted that another 16 species would likely have been found through additional surveys.

The FEIS is incorrect in claiming that, under critical area regulations, denser redevelopment adjacent to Paramount Open Space would actually improve conditions for adjacent wetlands and streams. This is for three reasons:

- First, the Shoreline critical areas code requires mitigation for any renovation or redevelopment of an existing structure within a critical area buffer that would expand the structure's footprint. We applaud the City's having adopted this clause, which would apply to any new or expanded single-family home in the R-6 zone just as much as it would apply to any new development under MUR-35. Denser zoning is not necessary to achieve buffer restoration.
- Second, wetland and stream buffers in the Paramount Open Space area typically cover all or nearly all of the affected parcels, so that it would simply not be possible to construct new, denser development outside of the buffers, as the FEIS claims on p.3-204 ("Under current zoning, [critical] areas are not clearly delineated and in some cases, residential and backyard structures are currently located in buffers, which would not be allowed with future redevelopment under any of the action alternatives.")
- Third, almost without exception, the existing structures in wetland or stream buffers are located about as far from critical areas as possible. Even with reconfigured parcel boundaries, new development could not get substantially further from the critical areas.

For these reasons, we support the Planning Commission's recommendation to maintain R-6 zoning in areas to the east and south of Paramount Open Space that are affected by critical areas and their buffers. We only ask that that same logic be extended to the area southwest of Paramount Open Space between 10th Avenue NE and 9th Place NE and between NE 147th and NE 145th Streets. We also believe that it makes sense to maintain R-6 zoning to the north of Paramount Open Space, where new development or redevelopment would be constrained by steep slopes.

The main advantage of continued R-6 zoning from a habitat perspective is the restriction of hardscaping to no more than 50% of the lot. A further advantage of this is the greater amount of land potentially available for green stormwater infrastructure for road runoff, which is the biggest water quality concern for Littles Creek and the Thornton Creek system. For those lots that could be included in expansions of Paramount Open Space, a third advantage is to reduce the future cost of potential acquisition.

We are currently in communication with the Shoreline Parks, Recreation and Cultural Services Department concerning their update of the Shoreline PROS Plan, discussing potential expansions of

Paramount Open Space. We also would like to see expanded restoration of the native understory within Paramount Open Space, potentially converting and restoring some of the large lawn that takes up most of the center of the open space, both for its own sake and potentially as mitigation for development impacts. Further, we ask that the City replace the undersized culvert at NE 148th St. and work with the state to replace the perched culvert under NE 145th St., using National Marine Fisheries Service 2011 fish passage design guidelines.

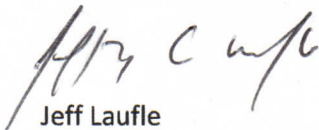
Lastly, in areas that become MUR-35 near Paramount Open Space (whether inside or outside of critical area buffers), we ask that the City provide for:

- Incentives or requirements to preserve as much vegetation as possible, and to use green roofs and other green infrastructure to address stormwater impacts;
- A requirement that new developments include wildlife-friendly features, such as:
 - Use of windows with UV reflectors or other features that help birds avoid collisions;
 - Inclusion of communal bird feeding gardens in building layouts;
 - Allowance for bird feeders (at least for hummingbirds) in lease agreements; and
 - Requirements that cats be kept inside, also through lease agreements.

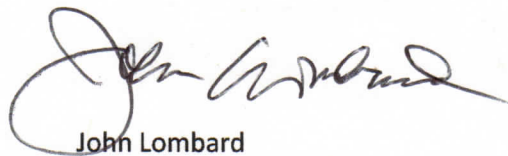
We developed this list of features in consultation with Professor Marzluff. We acknowledge that the full set of wildlife-friendly requirements goes beyond the normal scope of development regulations and would be unique in this region, but it could set a new standard to help promote wildlife throughout neighborhoods that are densifying to meet growth management requirements.

Thank you for the opportunity to comment on the NE 145th subarea plan. If you have questions about our comments, please contact TCA board member John Lombard, at jlombardwriter@gmail.com or 206-788-6443.

Sincerely,



Jeff Laufle
President



John Lombard
Board member

THORNTON CREEK ALLIANCE (TCA), founded in 1993, is an all-volunteer, grassroots, nonprofit organization of 130 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.

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