

February 4, 2021

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

RE: Planning Commission Meeting Agenda Item: 6b – Proposed Up-Zone

Planning Commissioners: Janelle Callahan, Andy Galuska, Mei-shiou Lin, Jack Malek, Laura Mork, Julius Rwamashongye, Pam Sager

CC: Steve Szafran, Planning Commission Liaison

Dear Commissioners,

Please include as a person of interest for this issue. I have done my best to identify my concerns below and would appreciate receiving a written response.

I am writing with concerns about the proposal to radically up-zone an area that serves to frame my neighborhood by sheltering it from the commercial activities along Aurora; while also stabilizing the steep slope, which drops from the ridge along Firlands Way; and intercepting, slowing, and filtering water upslope runoff.

**NOTICE TO NEIGHBORS?**

Item 6b Staff Report

“The State Growth Management Act (GMA), chapter 36.70A RCW, limits review of proposed Comprehensive Plan Amendments (CPAs) to no more than once a year. To ensure that the public and the City can consider the proposed amendments within a citywide context, RCW 36.70A.470 mandates that the City create a “docket” that lists the amendments to be considered in this “once a year” review process. . .”

Were any abutting or nearby neighbors notified of this proposed change? If not, why not? If so, what parameters were used to determine notification?

**CONFUSING PRESENTATION**

The Staff Report mentions one privately initiated amendment of two parcels. Only one parcel number is shown on the map which shows either two or three parcels yet only one

includes a parcel number. What is/are the parcel number(s) for the two sections of land shown on the map south of 7283900532?

### **HISTORY**

At the time that Firlands Way was built in 1914, it was designed as the first segment in the area, of what is now Aurora. Firlands Way is where it is today because it was determined to be too costly to build Aurora across the swampland feeding into Echo Lake at the low spot (still there in Aurora today) at the base of the hillside below Firlands Way. So, the road engineers simply chose to literally work around it creating a Firlands Way which is a curving arc of road that would stay dry, near the top of the hillside.

### **STEEP SLOPE**

However, the hillside remains and the drainage issues from a century ago continue as noted by the fact the Park N Ride required installation of a drainage retention system under its northeast corner where all of the planted “Raindrops” are.

The waters from the ridge of Firlands Way ridge are at the top of the McAleer Creek Watershed. The water drains from Firlands Way down the steep slope into Echo Lake moves on through Lake Ballinger to McAleer Creek and then into Lake Washington and Puget Sound. It’s important these waters be slowed and naturally filtered along the way if we are to have clear lakes, creeks and Sound from the point of entry. Shoreline needs to be a good “uphill” neighbor to all those who live downstream both in an near the water.

The Staff Report states:

“The two parcels are heavily vegetated with trees and overgrown shrubs and brush.”

This heavily vegetated area is not overgrown. It is a diverse and healthy habitat of the very type that numerous, city funded, urban forestry reports and assessments, have stated need to be created. This one is long-established and needs to remain. It slows and filters runoff as it enters the watershed. Removing it will significantly increase the need for runoff controls and deny support for all the wildlife it sustains.

### **VALUABLE HABITAT**

This greenbelt offers healthy habitat that supports a number of species of local wildlife including:

- Roosting perches for large birds “fishing” in Echo Lake – Bald eagle, Osprey, Blue Heron
- Nesting and feeding for number song birds, including both resident and migratory birds
- Nesting and feeding site for our native Douglas squirrels, currently be pushed out by the human friendly, invasive Eastern gray squirrels
- Nighttime roosts (and possibly nests) for Barred and Great-horned owls

- Little Brown bats
- Woodpecker feeding and nesting sites for Pileated, Hairy, Downy, Northern flicker and Red-naped sapsuckers
- Likely also racoons and opossums

#### **NEIGHBORHOOD CHARACTER AND IDENTITY**

Additionally, this greenbelt of native trees and understory is a defining feature of the neighborhood which makes a clear distinction between the commercial area of Aurora and the long-standing, single-family homes along Firlands Way. Removing this highly functional greenbelt would also strip away the sheltering embrace provided to this neighborhood exposing to the bright light of the public stage.

The existing parcels along Firlands Way are all zoned R-6. The zoning code has been designed to provide for gradual transitions from lower density R-6 (6 units/acre) zones by stepping up from R-6 through R-8 then R-12, R-18, 24 before reaching the proposed R-48. Re-zoning to R-48 abutting R-6 totally ignores the purpose of transitional zoning to moderate the impact of abrupt changes on neighboring property owners.

This area already has a huge number of multi-family housing on the way.

- High Hill Apartments recently completed at 18557 Firlands Way has 33 units
- Shea Property Permit #MFR20-0814 at 18815 Aurora Ave N. for 315 units
  - Submitted to neighbors as a seven-story building that would protect the trees to shelter the R-6 homes in the neighborhood behind it. It has now grown to ten stories, retaining only 6 trees while removing 57.
- Shea Property 18551 Aurora, Parcel #728390-0740, Pre-planning for 165 more units
- 19220 (Rat's Nest) 19220 Aurora Permit #MXU18-1501 "ready to issue for 7-story, 241-units + Commercial Space - CRUX"

At a time when many people are learning to "work from home" is there even a need for so much more housing? Is Shoreline at risk of over-development that will subject the city and all neighborhoods to future derelict buildings and blight?

#### **NEED FOR RECREATIONAL SPACE**

$33 + 315 + 165 + 214 = 727$  housing units, many will have multiple occupants. What is the plan to provide park and recreation space for all the new residents? This area is already underserved with park space and is considered to be a "park desert." What is plan to provide recreational space? Will the current Park N Ride become a new City/County park to accommodate what is roughly a 10% 20% increase to the Hillwood Neighborhood population?

#### **CUMULATIVE IMPACTS**

There is great need to evaluate the cumulative impacts of massive increase in density to this area and deny this ill-advised request to build anything on a steep-slope covered by native trees and understory that is retaining the hillside, using and slowing water runoff,

providing essential habitat for numerous species of local wildlife and defining the neighborhood for over 100 years

I request this zoning change NOT be added to the Comprehensive Plan docket. It destructive, dangerous, offensive and unwise.

Sincerely,

Boni Biery