



940 NE 147th St
Shoreline, WA 98155

February 4, 2021

Shoreline Planning Commission

City of Shoreline

17500 Midvale Ave N

Shoreline, WA 98155

**Subject: Park and Ride Townhomes proposal and
Comprehensive Plan Amendment/ Private Rezone**

Dear Planning Commissioners:

Thanks for this opportunity to address this proposal for a development and private Comprehensive Plan Amendment for a Rezone. Parcel 7283900532

Address N. 192nd St, Shoreline 98133

I am Chair of the Shoreline Preservation Society, a WA State non-profit based in the Shoreline area with a strong record of defending our natural environment and preserving our environmental and historic assets. We ask to be made a Party of Record in this matter with Legal Standing.

We include by reference all of the comments and records created thus far by the developer and city. We believe that this proposal will create a likelihood of adverse, environmental impacts to the community and residents for many reasons and cannot be adequately mitigated so should therefore be rejected.

In the matter of the Comprehensive Plan Rezone and Zoning Map Change Criteria, under Criteria 2(b) this proposal FAILS. It fails because as planned now, it will directly affect the Health, Safety and General Welfare of both nearby residents and downstream ones. This is because this proposal would require removal of dozens or more significant coniferous trees which currently buffer and protect the neighboring R-6 zone from Air Pollution generated at the Park and Ride and Aurora Avenue, from Noise pollution generated by the same and the downstream residents living by Echo Lake and further downstream in the McAleer Creek watershed, a salmon bearing stream. The developer's own replies on their SEPA checklist confirm the risks of Air and Noise pollution from the Park and Ride!

Furthermore, since this site is clearly in a Critical Area and steep slope, development here presents further potential dangers of landslides and instability to the upper slopes and public facilities below.

Furthermore, on Criteria 2(c +d), this proposal represents a serious threat to the R-6 zones adjacent because the actual buffer that currently exists, the significant urban forest greenbelt would be destroyed, and those homes would be severely exposed to the pollution and noise on the Park and Ride and Aurora Ave. The notion that 17 (or 18) town homes are a “buffer” is absurd on its face. Also, the “whataboutism” argument of “there are other places in town where R-6 homes have had their previous buffers destroyed, so we should also get away with it” is just absurd.

Critical Area Concerns

This site is clearly in an ECA (Environmentally Critical Area). This site is a Steep Slope and there is no plan shown to admit to this fact or mitigate the impacts. In the developers own Geotech Report it is described as an “erosion hazard area” according to the Shoreline Municipal Code Section 20.80.220 (D).

The Geotech Report also mentions concerns about possibilities of “erosion sensitivity related to vegetative cover”, in other words, if you cut most of the trees and understory erosion is likely.

So, preserving these trees is even more important than usual.

Considering the recent history in Western Washington of impacts from landslides, every possible risk should be taken seriously.

Historical information is lacking. The Park and Ride and property in question were previously known to be a Rhododendron Nursery and before that a large wetland which fed clean water to Echo Lake and McAleer Creek downstream. None of this important history has been acknowledged. The City of Shoreline actually spent a lot of public monies on a “natural drainage system at the corner of 192nd and Aurora Ave N in the last decade to address some clean water concerns. We propose that going forward the City should redesign this drainage facility into a more welcoming “park like” setting with conifers planted to mitigate the impact of Climate Change.

The remaining forested hillside is unbelievably valuable providing ecosystem services to protect water quality flowing into Echo Lake which is still challenged by water quality issues. If this development is approved, and a large amount of the trees removed, which is likely, the services they provide will be gone.

The historical wetland that was once located where the Park and Ride is now was also once called a “lake” by King County.

The section furthest south on this proposed development contains a rare ecosystem of beautiful native trees and rhododendrons. It contains a cluster of native plants and provides a rare opportunity to preserve the historical contribution of this site to Shoreline’s history. This site should be evaluated for possible wetland soils. And it should be considered for acquisition for Open Space by the City as a mini-park for the neighborhood.

Also, we request that a qualified, certified independent arborist be tasked with evaluating all of the trees and understory which might be affected by this proposal without bias.

There is also a “stormwater detention facility” already located on this site built by King County. How is the function of this facility addressed? How would its removal affect the downstream ecosystem? Who will pay for its replacement or redesign?

Tree Loss

Shoreline is facing a serious impact from continuous loss of its existing Urban Forests due to development. We have lost over 2000 trees to Light Rail development and every week and new development is approved with more loss of existing large trees. This greenbelt is just one more. If any development is approved there must be a 4-1 ration of tree replacement or higher!

We are now facing a huge challenge in America, Washington State and King County to address the pending Climate Change threats. Retaining existing coniferous forests is one of the most effective tools we have to combat Climate Change.

If the Planning Commission and Council approve this development and move forward on this Comprehensive Plan Amendment without addressing the impacts of the loss of these trees, you are failing in your previous promises to address the problems.

The many ecosystem services these trees provide, far outweighs the value of the timber or the proposed development. Of course, there is short term gain for the City's coffers and the developers' pocketbooks. But the longterm value of Climate Change defense, Clean Air and Water quality buffer, Noise Buffer, Migratory Bird Habitat, and of course BEAUTY to the neighborhood.

We urge the Planning Commissioners to consider SCIENCE very carefully when reviewing this proposal and think carefully about the longterm impacts of this proposed development.

We urge that you DENY this project proposal and private Comprehensive Plan Rezone Amendment.

Thank you for your attention to our comments.

Respectfully Submitted,

Janet Way, Chair

Shoreline Preservation Society