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From: Kathleen Russell

Sent: Friday, February 26, 2021 3:04:22 PM

To: <u>City Council</u>
Cc: <u>Plancom</u>

Subject: [EXTERNAL] SST Letter to City Council regarding TDR/LCLIP

Response requested: Yes Sensitivity: Normal Attachments:

SST Letter to City Council TDR_LCLIP 2_26_21.pdf

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Date: 2/26/21

To: Shoreline City Council; cc: Planning Commission

From: Save Shoreline Trees Advisory Board

Re: TDR/LCLIP

Save Shoreline Trees Advisory Board is writing this letter to the City Council in anticipation of the Council's upcoming planning meeting to be held on March 5-6, 2021. In addition to our proposed code amendments for tree preservation in Shoreline, Save Shoreline Trees has concerns regarding the TDR/LCLIP topic that will be discussed during this meeting.

According to the WA State "Citizens Guide to TDR Receiving Areas", "[e] very city ... under the State Growth Management Act is required to have a public participation program". A TDR/LCLIP is a significant and important decision on the part of any city and the citizens of Shoreline should be well informed before this program is implemented. We ask that the City be transparent in planning a TDR/LCLIP, to explain the proposed TDR/LCLIP in the City's "Currents" newsletter, and to hold more public meetings on this subject.

There are many components to a TDR/LCLIP. We understand that a Transfer of Development Rights ("TDR") program and the City's participation in a Landscape Conservation and Local Infrastructure Program ("LCLIP") can generate significant revenue for Shoreline to fund infrastructure and capital projects. We also understand that this is a complex program, with "senders" and "receivers", and uses tax increment financing ("TIF") which allows municipalities to borrow against increases created in property value by new developments.

The Director of Planning, Rachel Markle, provided in her Feb. 18, 2021 letter to Claudia Turner, a member of Save Shoreline Trees Advisory Board, a map of potential TDR/LCLIP sites along Aurora Avenue, Richmond Beach Road, Ballinger, and Ridgecrest, and the 145th and 185th subareas. It appears the light rail transit stations will be the prime areas for TDR/LCLIP-related developments. But what does the adoption of a TDR/LCLIP mean for Shoreline?

At this time, Save Shoreline Trees sees (1) a TDR/LCLIP might make it more attractive for developers to build in Shoreline particularly in MUR-70' zoned areas; (2) the City expects to benefit from "greater assessed tax revenues", and obtain funds to build or improve infrastructure in designated sites ("LIPA"); and, (3) King County's outlying rural farmlands and forested areas will be preserved. Save Shoreline Trees asks why isn't preservation of Shoreline's natural environment a top priority? Where is the City's commitment to saving the tall, mature trees in Shoreline?

With more development, more mature trees will be cut down. Specifically, many tall conifer trees have been removed in the Parkwood neighborhood. A total of 174 private trees plus numerous ROW street trees at three current construction developments have been or are scheduled for removal:

- (1) Intracorp's "Townhomes on 145th" (54 Significant trees cut down);
- (2) Intracorp's upcoming development at 1st Ave NE and N 147th (49 Significant trees to be cut down);
- (3) Pulte's "5 Degrees" at Meridian and 147th (proposal of 71 Significant trees to be cut down).

The threatened loss of mature trees on these development sites in and around the light rail station subareas will reduce our City's urban tree canopy. With more non-permeable surfaces and asphalt these developments will undoubtedly become heat islands. Save Shoreline Trees believes these mature trees are important resilient combatants against such climate change impacts. Pursuant to Shoreline's Comprehensive Plan, supporting analysis for Element 6: "Residents characterize the city as a wooded community; this is often cited as a key reason for locating in the area." Also, preservation of trees is mentioned as an important guideline in the Comprehensive Plan, Community Design CD 37: "Minimize the removal of existing vegetation, especially mature trees when improving streets or developing property."

There is a misconception that planting new trees will replace Shoreline's mature trees, particularly our tall conifers. Save Shoreline Trees continue to state that "new trees do not equal mature trees". There is irreplaceable loss to the environment and the citizens of Shoreline when our tall healthy conifers are cut down. In our lifetimes, new trees are not able to combat the current global climate change crisis.

In summary, we urge the City Council to table the adoption of the TDR/LCLIP until it is fully studied for effectiveness and applicability to Shoreline. In addition, we ask the Council to direct City staff to undertake a program of public education regarding TDR/LCLIP so Shoreline residents can be well informed and have opportunities to ask questions beyond 2- or 3-minute comments at Planning Commission and City Council meetings. Per GMA direction, "public participation is required."

Sincerely,

Melody Fosmore, Chair
Save Shoreline Trees Advisory Board
Barbara Johnstone
Kathy Kaye
Kathleen Russell
Susanne Tsoming
Claudia Turner



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