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From: [stsoming](#)

Sent: Monday, March 15, 2021 9:03:00 AM

To: [City Council](#)

Cc: [Plancom](#)

Subject: [EXTERNAL] Proposed Comprehensive Plan Amendment re N 192nd St. between Firlands Way N and Aurora Ave N - rezone request

Sensitivity: Normal

Attachments:

[ST's N 192nd St Ltr to CC.docx](#) 

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Dear City Council Members,

Attached is my comment to the above-referenced proposal which I would appreciate your attention and inclusion in your upcoming Council Meeting.

Sincerely,

Susanne Tsoming
Hillwood Neighborhood Resident

VIA EMAIL to council@shorelinewa.gov

To: Shoreline City Council

Date: March 15, 2021

Re: Proposed Comprehensive Plan Amendment re N 192nd St. Rezone Request from R-18 to R-48 on Tax Parcel Nos. 7283900532 and 7283900524

Dear Councilmembers,

Since the Shoreline Comprehensive Plan is reviewed annually, it is vital to weigh your decisions carefully about the above-referenced proposal to rezone N 192nd St. To avoid redundancy and by reference, I incorporate and endorse the points made in the following letters to the Planning Commission in opposition to the proposal to rezone N 192nd St.:

- Letter dated February 4, 2021 by Ms. Boni Biery
- Letter dated February 4, 2021 by Ms. Janet Way
- Letter dated February 5, 2021 by Ms. Kathleen Russell
- Letter dated February 15, 2021 by Ms. Ameer Dixit

Until satisfactory answers to the posed questions in these letters are provided, the approval of the rezoning of these land parcels, should be denied or held over for further review. For example, in the Nov. 30, 2020 submitted SEPA Environmental Checklist by Marlin Gabbert of Gabbert Architects on behalf of the property owner responds to

“3. Water (a) surface water: (1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. Applicant’s answer: “None”. According to Janet Way’s Feb. 4, 2020 letter, this is untrue. “The historical wetland that was once located where the Park and Ride is now was also once called a “lake” by King County. 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.” Boni Biery noted that “[t]he waters from the ridge of Firlands Way ridge at the top of the McAleer Creek watershed. The water drains from Firlands Way down the steep slope into Echo Lake and moves on through Lake Ballinger to McAleer Creek and then into Lake Washington and Puget Sound.”

Despite the fact that it was once a wetland, what you don’t see is under the ground. The land parcels in question are in a critical area, as defined by the 2012 Comprehensive Plan as follows:

“Critical areas are parts of the landscape afforded special protection because they provide unique environmental functions that are difficult, if not impossible, to replace, and/or they promote public health, safety, and welfare. The City’s development regulations extend protection to the following critical areas: streams and riparian areas, wetlands, aquifer recharge areas, habitat conservation areas, geological and flood hazard areas, and shorelines.”

Though Applicant provided a Nov. 18, 2020 Geotechnical Report by Robinson Noble in support of its proposed construction, it appears from its Conclusions and Recommendations that it will be costly and a major project to ensure stability of the foundation and proposed structures.

Economically-speaking, the only way to recoup such costs is to build more units on the land by going higher. This is probably Applicant's reason to request a R48 rezone.

As noted in Boni Biery's Feb. 4, 2020 letter, the "area already has a huge number of multi-family housing on the way." By her calculation, 727 housing units will be concentrated in the area around the Shoreline Park & Ride. Granted, this location is convenient for shopping and transit riders, but where will future occupants with children take their children to play? Young families need space and/or accessibility to green areas. With 727 housing units in process, there is no need for greater density housing in this area.

Furthermore, these land parcels lack suitability for R-48 zoning. Applicant answered that "[T]he rezone will help the city meet the density goals of the Growth Management Act without sacrificing more low density housing in the R6-R12 zones. In the Pre-Application Meeting Request, under project description, Applicant wrote "Also, the owner would like to change the zoning from underlying zoning of R18 to R48 so they could build at least 18 townhomes. . . . The site lends itself to this type of development given it is sandwiched between a parking facility and R6 zoning." However, as stated in Kathleen Russell's 2/5/21 letter, the proposed amendment to rezone the land parcels from R18 to R48 for the sake of conformity is ignoring the intent of the original R18 zoning.

"The parcel in question measures 26,662 square feet, less than an acre. This is a relatively narrow parcel between the Park and Ride service street and R6 housing. There is direction in the Shoreline Municipal Code that should be considered before making this decision. According to SMC 20.50.290(C): Promotion of building and site planning practices that are consistent with the City's natural topography and vegetative cover." Is this site really appropriate R48 zoning?

I agree with and identify as one of Ameer Dixit's "homeowners in Hillwood, many of whom have lived in this city for decades" as stated in her Feb. 15, 2021 letter. We are witnessing a major change to our neighborhood as developers level the land and replace our irreplaceable tall conifers with walls. The mature trees that occupy the ridge about the Park & Ride provide a screen for the residents along Firlands Ave N, they provide shade, habitat for wildlife as well as mitigate the strong wind gusts. Building walls will intensify any wind gusts downward to create a canyon effect, like the ones experienced among Seattle's downtown highrise office buildings.

For the above-stated arguments and other opponents' statements, I ask the Applicant/Owner to withdraw this rezone request. If he/she refuses and persists, I ask the City Council to deny approval of rezoning the land parcels to R48.

If not already a party of record in this matter, please add my name and contact. Thank you.

Sincerely,

Susanne Tsoming
Hillwood Neighborhood Resident