

September 26, 2022

VIA EMAIL - hearingex@shorelinewa.gov

To: City of Shoreline Hearing Examiner Clerk
c/o Shoreline City Hall
17500 Midvale Avenue North,
Shoreline, WA 98133

RE: Application No, PLN22-0113
King County Metro request for Rezone of “Park & Ride”
19000 Aurora Avenue North, Shoreline, WA 98133

Please enter the following comments into the public record for the public hearing for the above-named Application:

In Aug 2022, King County Metro submitted a request to the City of Shoreline, Washington, asking for the following:

- A change in the site-specific Comprehensive Plan Land Use Map designation for its Park & Ride site at 19000 Aurora Avenue North from “Public Facilities” to “Mixed Use 1”; and
- A rezone of a portion of the parcel from R-18 to Mixed Use Business (MB).

Due to the environmentally sensitive nature of the property at 19000 Aurora Avenue North, as determined in prior assessments of the property by the City several years ago, I request the comment period be re-opened to provide the opportunity for critical public input. It is essential this proposed rezone be more carefully thought through before going forward.

Though the City has issued a Determination of Nonsignificance (DNS) for this proposal on August 25, 2022, I am using and attaching portions of King County’s SEPA Checklist responses, together with my comments, to illustrate my concerns.

Given the history, geological conditions and potential land use risks, further assessment of the hillside abutting the western edge of the site is needed. In summary, according to prior King County zoning, City of Shoreline studies and the current site conditions, the site is known to be an erosion hazard that could result in a landslide and loss of the established homes situated above the site. If the proposed Mixed Business (MB) zoning is allowed all the established trees on the property can be removed because MB zoning allows the complete removal of trees and could destabilize the entire hillside.

Furthermore, currently a Conservation Futures Grant request that has been recommended for funding for the abutting property on the hillside above the site in question (King County Parcel #7283900532). It is currently zoned R-18, but is intended for future green space to protect the hillside and the Hillwood neighborhood.

Sincerely,

Boni Biery, Shoreline resident (bonitabiery@gmail.com)

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

[METRO K.C.] The Shoreline Park & Ride (subject site), has a comprehensive plan designation of Public Facility, with a small area on the west parcel boundary designated High Density Residential. Approximately two-thirds of the subject site is zoned MB (Mixed Business) with the remaining one-third zoned R-18 (Residential, 18 units/acre). Metro is requesting an amendment of the parcel's comprehensive plan designation from High Density Residential and Public Facility to MU1 (Mixed Use 1) with a concurrent change from R-18 zoning designation to MB, consistent with the rest of the parcel.

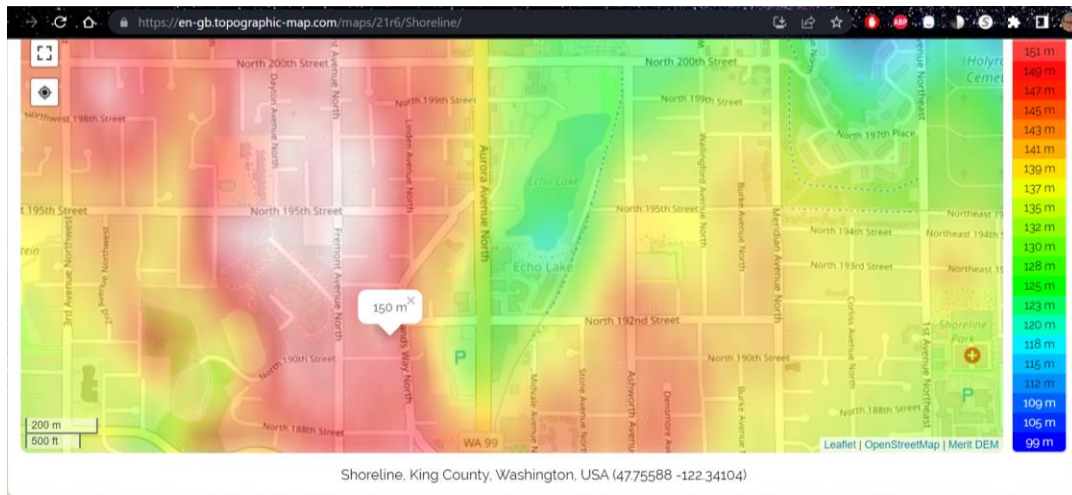
In 2017, Metro purchased a 5.34-acre property from Washington State Department of Transportation (WSDOT), currently known as Shoreline Park-and-Ride. The facility provides 401 commuter parking spaces, one active bus bay, three bus layover spaces, and a comfort station for Metro drivers. The facility is served by multiple bus routes including the RapidRide E Line.

Lynnwood Link light rail service to Shoreline, and consequently Metro's service to the park-and-ride is expected to change in the same year and demand for transit parking may decrease. As property value in King County rises, the demand for affordable housing increases. Therefore, pursuing transit-oriented development at the Shoreline Park-and-Ride that can both accommodate transit and commuters' needs and provide the most affordable housing units has become a Metro's priority. Through the ETOC policy, Metro strives to attain several community goals. The community goals include, but are not limited to, increasing affordable housing options, offering commuter parking, and providing public open spaces. . .

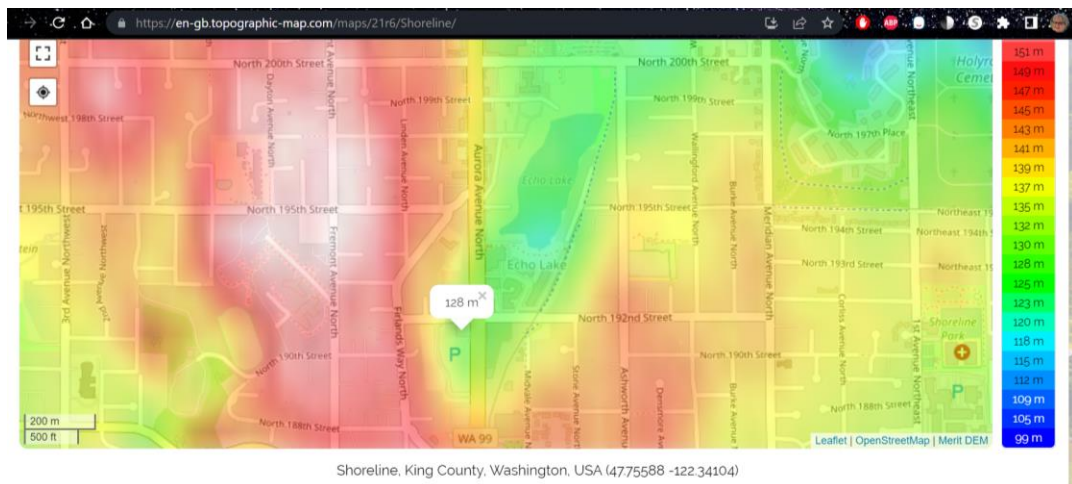
[B. Biery] -There is good reason to believe that use of this Park & Ride as a base for Link Light Rail users to park and use buses for the last mile to the station being built at N 185th and 5th – 10th Ave NE will increase usership.

[METRO K.C.] However, the consultant team found that in order to continue to provide 401 stalls of transit parking under current market conditions, it is crucial that the entire site receives a Mixed Business (MB) designation and is developed to maximize the number of housing units. The existing subject site has two different zoning designations on different locations of the same property, otherwise known as "split zoned". The frontage on Aurora is zoned MB, a designation allowing mixed-use buildings up to 70 feet or five to six stories with one or two decks of parking. West of the sewer easement, abutting the single-family residential neighborhood, the land is zoned R-18, allowing high-density residential units up to 18 units/acre (see Figure 2 in Exhibit A)

[B. Biery]- If there is no intention to build in the R-18 zoned area, why is it "crucial" to change the zoning? The current zoning requires retention of at least some of the vegetation that stabilizes the steep slope which stores and empties watershed surface water into the retention pond and wetland under the current Park & Ride into Echo Lake, Lake Ballinger, McAleer Creek (salmonid bearing), and then Lake Washington. See below topography maps.



[B. Biery] -Topography changes from 150 meters to 128 meters or a drop of 22 meters (72.2 ft) in the length of one block.



[METRO K.C.] In addition, the subject site currently has a comprehensive plan designation of High Density Residential and Public Facility. The existing residential and mixed-business zones have boundaries that do not correspond to the overlying plan designations for residential and public facility uses on this parcel. Figure 2 in Exhibit A illustrates these disparities, showing the High-Density Residential plan designation on the west side of the property while the implementing zone, R-18, covers a much larger portion of the parcel area, approximately 1.8 acres. The Public Facilities Comprehensive Plan designation covers most of the site, including most of the R-18 zone. R-18 is not an implementing zone for the Public Facility plan designation. Therefore, current zoning and plan designations are inconsistent.

As a result, Metro is proposing to resolve the zoning and plan designation discrepancy by pursuing approval of the plan designation of MU1 across the entire site. Metro is also proposing to resolve the split zone issue by seeking approval of the designation of MB over all of the site. The concurrent MB rezone implements the MU1 plan designation by encouraging the development of vertical and/or horizontal mixed-use buildings or developments along Aurora Avenue N. Extending MB to the entire site does not only allow the future development to maximize the number of housing units, but it would also be consistent with Shoreline’s long-range plan for intensive commercial and residential uses in the Aurora Avenue Corridor, and with surrounding MB zoning and commercial and multifamily residential uses to the north, east and south.

[B. Biery] - The history on zoning in this area is shown the table below. Whatever Comprehensive Plan overlay is required to match a zoning designation that would protect this long-established Erosion Hazard is needed. Mixed Business zoning allows for the removal of all vegetation with no requirement to replant and could easily result in erosion issues. Some other combination of Comprehensive and Land Use zoning is needed in this area of the site that both protects the hillside and corrects the current comprehensive plan zoning discrepancies.

<i>Timeframe</i>	<i>Event</i>
<i>1990 or earlier</i>	<i>King County identified this parcel as an Erosion Hazard</i>
<i>1990 - 1995</i>	<i>Before Shoreline Incorporated KC rezoned it to R-18</i>
<i>1995</i>	<i>Shoreline incorporated</i>
<i>2021</i>	<i>King County to begin a study of the Park & Ride lot for Transportation Oriented Development (TOD) "very soon."</i>
<i>Near future</i>	<i>Over 700 new housing units within 2 blocks of this property</i>

1. Earth

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other: retention pond

[METRO K.C.] The description of ground-level topography is not particularly relevant to this proposal because no development is proposed. The 5.34-acre subject site is predominantly flat to accommodate the existing park-and-ride but situated below grade relative to the adjacent lots and streets. The northeast corner is at grade with N 192nd Street and Aurora Avenue N, while the southern area of the site is approximately 25 feet below grade from Aurora Avenue N. The residential properties to the west of the site lie 5 -10 feet above the grade of the main park-and-ride area. When entering into the park-and-ride from Aurora Ave N and exiting the park-and-ride out to N 192nd St, the access road gradually slopes up. The existing retention pond has an approximate excavation depth of 6 feet.

b. What is the steepest slope on the site (approximate percent slope)?

[METRO K.C.] The steepest slope on the subject site is approximately 69% slope located at the southwest corner of the subject site parcel, west of the access road facing the entrance/exit to Aurora Ave N (See Figure 1 in Exhibit A). . .

[B. Biery] - The rezoning of this steep slope which is known to be an erosion hazard is very pertinent as the change in zoning to MB would allow for the removal of slope stabilizing vegetation increasing the risk of a landslide.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

[METRO K.C.] This proposal would not cause any erosion as a result of clearing, construction, or use because no ground disturbance is associated with the rezone and comprehensive plan map amendment. The future development will be subject to a separate SEPA review and action determination and the developer will need to conduct all necessary studies, such as a geological engineering report, to assess the impacts the development might have on erosion.

[B. Biery] - While this proposal does not, in itself, cause any erosion, however it opens the door to it by allowing the total denuding of all vegetation from the slope identified as a Erosion Hazard. Mixed Business zoning would allow removal of all slope stabilizing vegetation.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

[METRO K.C.] This proposal would not increase the impervious surfaces of the subject site because no development or construction is proposed. The feasibility study done by Metro assumed the future development would retain both the access road and the retention pond.

Approximately 80% of the subject site is a paved parking lot with vegetated medians located in the perimeter and various locations within the parking lot. If the future development was to replace all the vegetated medians with impervious surfaces, the percentage of the site covered with impervious surfaces would be about 90%. However, the future development will be subject to a separate review under SEPA and the developer will need to comply with City of Shoreline's land use and zoning code in effect at the time of application.

The assumption that both the access road and the retention pond would be retained is a poor basis for this proposal. . .

[B. Biery] - If the R-18 zoned portion of the site is rezoned to MB the existing City of Shoreline code will NOT protect this steep slope from dangerous development. A different solution should be sought.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: No measures are needed or proposed because there will be no impacts. Any future development will need to ensure all measures proposed would be compliant with City of Shoreline's land use and zoning code in effect at the time of application.

[B. Biery] - If the R-18 area of this site is rezoned to Mixed Business it will be too late to maintain the existing erosion control and slope stabilization.

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. If appropriate, state what stream or river it flows into.

[METRO K.C.] There is a retention pond located at the southwest corner of the subject property. Echo Lake is located approximately 948 feet northeast of the subject site. Surface drainage from the subject site is collected via a series of catch basins and connected to the piped storm drainage system that discharges into Echo Lake.

[B. Biery] - Echo Lake is the closest recipient of the waters that run under the Park & Ride. The water passes through Echo Lake, into Lake Ballinger, then McAleer Creek which is salmonid bearing before emptying into Lake Washington.

4. Plants

b. What kind and amount of vegetation will be removed or altered?

[METRO K.C.] The proposal involves no construction, and therefore no kind and amount of vegetation will be removed or altered. The subject site is a functioning park-and-ride and the surface area is mostly paved, with a few medians planted with deciduous and evergreen trees, shrubs, and grass in the parking lot. Mature vegetation exists on the south and west boundaries of the site. Vegetation on the south and west boundaries includes large Douglas fir trees that screen the site from neighboring residences. A group of rhododendron bushes also lines the west side. When a future developer constructs the TOD structure(s), the vegetation located in the existing parking lot medians in the eastern portion of the subject site might be removed. The access road and the retention pond in the western portion of the subject site is presumed to be untouched, and therefore the vegetation in that area will not be removed or altered.

[B. Biery] - The presumption that a developer required to maximize density on the site per King County housing density requirements combined with MB zoning will most certainly result in the removal of both the current vegetation and the access road. Both of these actions will destabilize the hillside and increase the likelihood of a landslide. Again, a different zoning solution that affords the protection of this slope should be sought.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

[METRO K.C.] Examples include:

birds: hawk, heron, eagle, songbirds, other: **Crows, pigeons** mammals: deer, bear, elk, beaver, other: **Squirrels, Rats**

fish: bass, salmon, trout, herring, shellfish, other _____

[B. Biery] - This list should also include Little Brown Bats which roost in the area and the Bald eagles, Blue Heron, and Osprey which all use the trees along the west side of the site for spotting fish in Echo Lake.

Also, native Douglas squirrel have been seen in the area.

d. Proposed measures to preserve or enhance wildlife, if any:

[METRO K.C.] The proposal only proposes a rezone and an amendment of the comprehensive plan designation, and does not involve construction. The developer building the future TOD

[B. Biery] - The rezoning of the R-18 portion of this site to MB would likely result in the removal of perching sites for the fishing birds listed and may drive them from the area completely. Even the construction allowed on the remaining portion of the site by the use of MB zoning to 70 ft plus "bonus" height may do the same. These large birds need unobstructed views from tall perches to fish and feed themselves.

7. Environmental Health

4) Describe special emergency services that might be required.

[METRO K.C.] No new, different, or additional special emergency services would be required because no physical changes or changes to operations are proposed. The proposal is limited to a rezone and an amendment of the comprehensive plan designation, and does not involve construction. The future development will need a separate site-specific SEPA review to study the

effects that the new TOD structure(s) might have on special emergency services requirement. 4) Describe special emergency services that might be required.

[B. Biery] - The proposed rezoning is driven by the desire to build dense housing for 700+ residences. Of course, there will be a need for increased fire and police services.

b. Noise

1) What types of noise exist in the area which may affect your proposal (for example: traffic, equipment, operation, other)?

2) What types and levels of noise would be created by or associated with the proposal on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indi- cate what hours noise would come from the site.

[METRO K.C.] Currently, this site experiences traffic noise from Aurora Avenue N and N 192nd Street. However, existing noises in the area would not affect the proposal, which is limited to a rezone and an amendment of the comprehensive plan designation, and does not involve construction. Therefore, the question does not apply.


[B. Biery] - If the R-18 area is rezoned to MB it will definitely impact the neighborhood noise levels. The likely removal of the large trees identified will be allowed by MB, will reduce the noise buffering they provide and result in the increase traffic noise to nearby homes.

8. Land and Shoreline Use

c. Describe any structures on the site.

[METRO K.C.] The subject site includes a surface parking lot, an access road, an active bus bay, three bus layover spaces, a comfort station, several benches, and multiple light poles and signs. An existing retention pond is located to the west of the access road and a RapidRide E Line Station is located to the east of the parking lot on Aurora Ave N.

[B. Biery] - This site includes a Voting Drop Box and a public art installation called “Rain Garden Plaza” in the northeast corner. It is heavily planted with wetland plants and rain gardens as shown here.




AURORA CORRIDOR

Rain Garden Plaza at N 192nd Street

Improvements between N 185th and N 192nd Streets include construction of the new Rain Garden Plaza located at the southwest corner of N 192nd Street and Aurora Avenue N.

This plaza will feature:

- Rain gardens and natural stormwater treatments
- Educational displays and demonstration areas
- Low maintenance evergreen and deciduous plants
- Lighting designed to ensure safety and discourage loitering
- Easy access to the adjacent King County Metro Park and Ride



Final design of Rain Garden Plaza at N 192nd Street

January 2011

e. What is the current zoning classification of the site?

[METRO K.C.] The subject site has two different zoning designations on different pieces of the same property, otherwise known as “split zoned”. The frontage on Aurora is zoned Mixed Business (MB), a designation allowing mixed-use buildings up to 70 feet or five to six stories with one or two decks of parking. In the western portion of the subject site, abutting the single-family residential neighborhood, the land is zoned R-18, allowing high-density residential units up to 18 units/acre (see Figure 2 in Exhibit A).

[B. Biery] - Why King County rezoned this area of the site to R-18 seems questionable in light of the known erosion risk (see item h. below). It is requested that a zoning code that provides for the protection of the tree canopy and understory which stabilize the hillside and protect the uphill housing from landslides be employed, not a MB zoning.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

[METRO K.C.] Per King County iMAP and City of Shoreline Property Information Interactive Map, the subject site is located in an erosion hazard area.

i. Approximately how many people would reside or work in the completed proposal?

[METRO K.C.] No one resides in the subject site. The subject site serves as a park-and-ride for the public to utilize Metro’s bus services for commuting purposes. Metro personnel work and maintain the subject site as needed. No physical changes are proposed. The proposal is limited to a rezone and an amendment of the comprehensive plan designation, and does not involve construction.

However, approval of the rezone and plan map amendment would allow future mixed use development that could accommodate approximately 1,200 residents. The development will be subject to a separate SEPA review and is not part of the current proposal.

[B. Biery] - Rezoning the area of this site that is R-18 MB would preclude the ability to protect the steep hillside in the future. There are several homes currently above the site which could slide onto whatever is built at the base. MB zoning will not preclude removal of the natural stabilization of trees and understory now holding the hillside in place. These should not be compromised putting the anticipated future 1200 new residents at risk.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

[METRO K.C.] The proposal only proposes to rezone and to amend the comprehensive plan designation, and does not involve construction. Therefore, no housing units would be provided by this proposal. However, as noted above, Metro’s future intention for the property would be a mixed-use transit oriented with market-rate and affordable housing, as well as commercial or community space. The feasibility study for future development performed a capacity analysis for two scenarios by determining the massing and approximate unit count possible on the site. The two development scenarios are:

1. A stand-alone transit garage and an adjacent mixed-use development; and
2. An integrated garage with mixed-use development.

For the two scenarios, the feasibility study examined two parking alternatives:

1. WSDOT's 401 transit parking stalls intact; and
2. A share of 100 stalls or 25 percent of the total transit parking with the future development.

The feasibility study determined that the site could deliver between 558 and 694 units of housing and 6,000 square feet of retail if development on the site was maximized. The stand-alone transit garage scenario, with or without a shared-transit parking alternative, would provide approximately 558 market rate housing units on two levels of structured parking. The stand-alone garage will replace the existing surface parking. The integrated garage scenario, with or without a shared-transit parking alternative, would provide approximately 694 market rate housing units on two levels of structured parking and one level of underground parking that will replace the existing surface parking [underlining added] lot for commuters. An integrated garage, where commuter parking and parking for TOD is provided on a single podium, would maximize residential development capacity. In addition, if WSDOT allowed for a shared parking arrangement where 100 stalls currently dedicated to transit could be shared with a future development, the financial feasibility to provide the maximum number of housing units would be improved. If in the future, Metro determines that it needs fewer than 401 parking stalls at the Shoreline Park-and-Ride and WSDOT was amenable to changing its deed restriction, lowering the total number of parking stalls required on site would also improve the feasibility to maximize the number of housing units. . . .

[B. Biery] - This document mentions this historical wetland site has only been excavated to 6ft in depth. Even though it is paved over, it remains a wetland as demonstrated by the work required to correct drainage issues in the past. What will excavation for an underground parking facility do to it? Or the weight of 70 ft+ tall buildings? Will MB zoning require consideration of liquefaction that could occur on this site?

[METRO K.C.] . . .The feasibility study also addressed equity through the application of Metro's Equitable Transit Oriented Communities Policy that requires Metro to provide a minimum of 20 percent of housing units produced on its property for housing affordable to households making at or below 80 percent of the area median income (AMI). This policy directive resulted in considering restricted cash flow for between 110 and 140 units of housing on the site. . . .

[B. Biery] - The study of housed affordable units is a separate building thereby "othering" them. Is this really something King County considers to be acceptable? I thought the goal was integration not singly out people to shame them.

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

[METRO K.C.] The proposal involves no construction, and therefore this question does not apply. For the future TOD structure(s), the tallest height in the development is envisioned to be 70 feet (height limit). Exterior materials are likely to be a mixture of the wood/metal/insulated panels that are typical of residential construction. The developer constructing the future TOD structure(s) will be responsible for determining those materials and also be subject to a separate SEPA review. The future development is not part of the current proposal.

[B. Biery] - The 70' height limit mentioned here is believed to be the maximum before "bonus" height increases that could make buildings even taller.

- b. What views in the immediate vicinity would be altered or obstructed?

[METRO K.C.] The proposal involves no construction and therefore this question does not apply. Structures in the MB zone to the north, east and south are permitted to have a maximum height of 70 feet. Future redevelopment would alter views from the commercial uses to the south and east because there are no existing structures on the site that are above one story high. The views for residents to the west may change if the intervening parcel is developed where currently there are mature Douglas firtrees on site. Future TOD structure(s) will be subject to a separate SEPA review and the future development is not part of the current proposal.

[B. Biery] - This statement anticipates and acknowledges the potential to remove the existing hill-retaining trees and understory that need to be left undisturbed to continue stabilizing the hillside.

c. Proposed measures to reduce or control aesthetic impacts, if any:

[METRO K.C.] No measures to reduce or control aesthetic impacts are needed because no impacts will occur.

[B. Biery] - Simply rezoning the R-18 area will implement future changes that will impact wildlife, noise, and public safety.

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

[METRO K.C.] The proposal will not produce any new, different, or additional light or glare. However, the amount of light and glare would be different if future TOD structure(s) are constructed as a result of the approval of the proposal.

[B. Biery] - Since the R-18 zoned portion of this site is a roosting area for the little brown bats (*Myotis lucifugus*) that feed primarily over Echo Lake, rezoning to MB would allow for the clearing and the construction of tall, lighted buildings. It could have negative impacts such as the proposed buildings would significantly increase the amount of manmade light in the area while also blocking easy access to the roosting sites and risk colony failure of the bats which consume pounds of insects each year. In turn, the insects would then be able to breed unchecked by natural predation.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

[METRO K.C.] The designated and informal recreational opportunities on site or within four to five blocks of the subject site are as follows:

1. City of Shoreline Park (located at the northeast corner of the subject site at the intersection of N 192nd St. and Aurora Ave N)
2. Echo Lake Park
3. Dale Turner Family YMCA
4. Shoreline Farmer's Market (sharing the same location with the subject site)
5. Woolsey Stadium/King's High School Football Field

[B. Biery] -

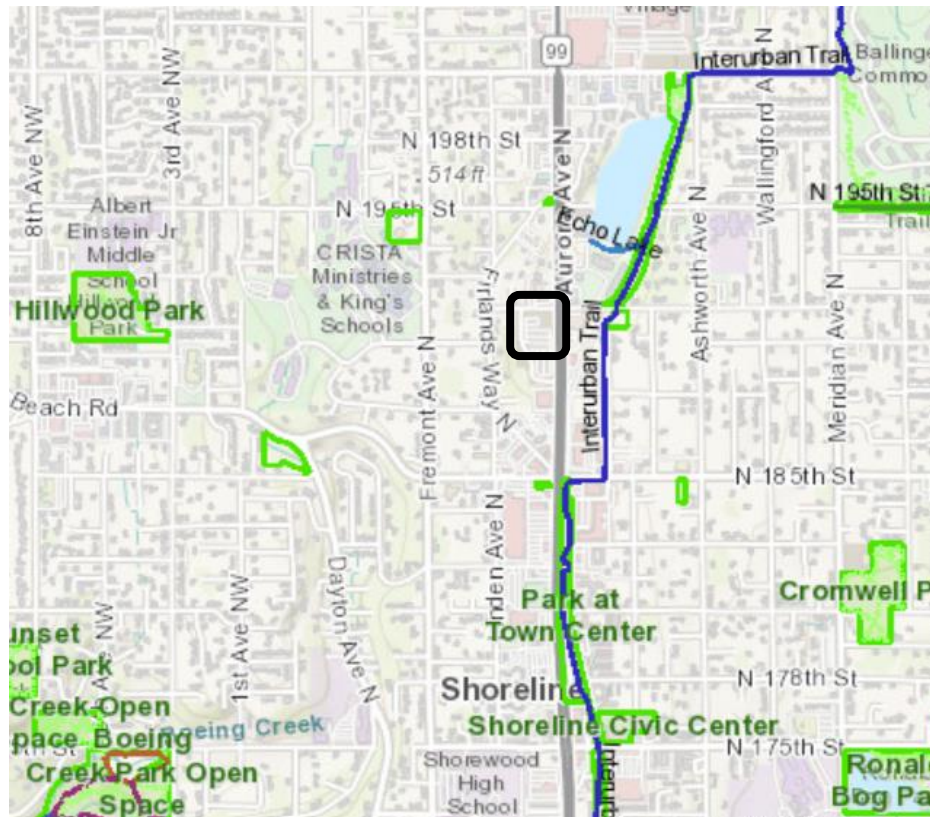
What is called a "park" in the northeast corner of the site is actually a public art installation called "Rain Garden Plaza" and is about 60 foot square. It is not a park.

The Farmer’s Market is not generally considered to be a recreational opportunity.

The Dale Turner YMCA is a great place, but it is not free.

Woolsey Stadium and the King’s High School Stadium are not available for use by the general public.

This entire portion of the city has long been recognized to be a “park desert” as demonstrated by the map below.



c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the proposal or applicant, if any:

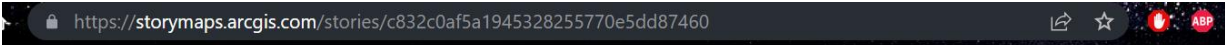
[METRO K.C.] The proposal only proposes a rezone and an amendment of the comprehensive plan designation, and does not involve construction. However, in anticipation of the proposed rezone and plan designation amendment, Metro, the King County Department of Community and Human Services (DCHS), and City of Shoreline staff collaborated on a list of community stakeholders to engage in a public engagement process. Metro, supported by a consultant team, ran a four-workshop engagement process. At the conclusion of the workshop series, the participants identified the following recreational opportunities, which are targeted to be incorporated into the design of the future development:

1. Include a playground
2. Create a community hub as a ground floor use
3. Provide a community garden or green space

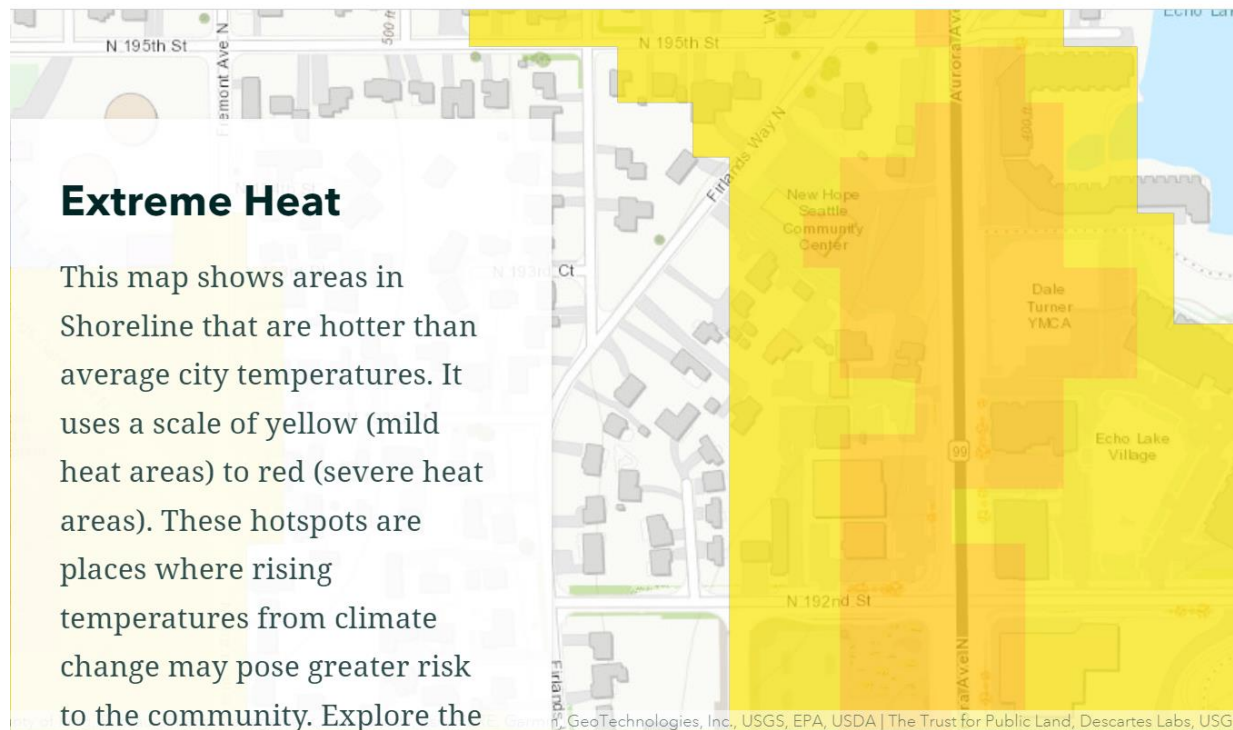
[B. Biery] -These are good proposals to have in generous proportions. However, it is important to note that this entire site is part of a large heat island and zoning to install buildings will add to the physical mass storing heat and increase what is already an issue of health equity as shown below. The heat island effects could be

reduced if building roofs, especially a parking structure were designed to support large, dense evergreen plantings to mitigate the heat and improve opportunities for wildlife.

13. Historic and cultural preservation



ate Change and the City of Shoreline



b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

[METRO K.C.] The existing subject site has been previously excavated to a depth of approximately six feet for the retention pond and approximately five feet for light pole foundations. The proposal would not impact any landmarks, features, or other evidence of Indian or historic use or occupation, if they existed, because no physical changes to any buildings or structures or excavation are proposed. The developer constructing the future TOD structure(s) will need to undergo a separate site-specific SEPA review and consult with DAHP for impacts on any landmarks, features, or other evidence of Indian or historic use or occupation.

[B. Biery] - The wetland covered by the Park & Ride and hillside above it are long established sites. The wetland, once called Lake Firlands is the reason why Firlands Way at the top of the hill exists. Firlands Way was built to go around the wetland. While the rezone itself will not have impacts the new zoning probably will. This site is wetland and has had drainage issues in the past. Excavating for a 70ft+ tall building and/or an underground parking facility could significantly affect the soil stability of the site and possible soil liquefaction issues.

14. Transportation

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

[METRO K.C.] . . . However, with the Link light rail extension to Lynnwood scheduled to be operational in 2024, two light rail stations would open in the City of Shoreline. The north station on NE 185th Street is approximately one mile from the subject site. It is envisioned that bus services will change at that time to provide feeder routes from the light rail station. Commuters to Seattle or other communities served by Link will probably use the Link station park-and-ride, rather than the subject site.

[B. Biery] - It should be noted this Park & Ride may become the critical ‘last mile’ to and from Link light rail for commuters who will park their vehicles and catch a connecting bus to the Light Rail stations. Will there be enough parking spaces to accommodate?

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

[METRO K.C.] The proposal is limited to a rezone and an amendment of the comprehensive plan designation, and does not require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities. The feasibility study assumed that the access road is retained but that assumption may change with the acceptance of a development agreement with a future developer.

[B. Biery] - It is questionable to say on one hand that the access road is expected to remain based on the feasibility study and on the other hand, propose rezoning that would almost guarantee the access road will be razed.

Additionally, should this increase in density be created where there are already hundreds of new housing units being built within a couple of hundred feet, there will be a need for substantial traffic mitigation along Firlands Way which is already over-burdened with cut-through traffic.

15. Public Services

a. Would the proposal result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

[METRO K.C.] The proposal would not result in an increased need for public services because no development that would generate that need will occur. The proposal is limited to a rezone and an amendment of the comprehensive plan designation, and does not involve construction. The future development will probably result in an increased need for public services, but it will be subject to a separate site-specific SEPA review and the developer will need to assess the impacts the development would have on public services demand.

[B. Biery] - The outcome of this proposed zoning change would indeed generate the need for more schools for the increased number of residents, public transit, health care, fire, and police.



September 27, 2022

VIA EMAIL –hearingex@shorelinewa.gov

Shoreline City Hall
Attn: Hearing Examiner Clerk
17500 Midvale Ave N
Shoreline, WA. 98133

Re: Application No. PLN22-0113; King County Metro Permit Request for site-specific Comprehensive Plan Map Amendment and Concurrent Rezone for 19000 Aurora Ave. N., Shoreline WA

Dear Hearing Examiner Clerk,

Save Shoreline Trees is a 501(c)(3) organization (SST) based in Shoreline, WA to bring Shoreline neighborhoods together to preserve its tall conifer and native tree canopy. We are writing to support the comments made by Boni Biery in her Sept. 26, 2022 letter regarding the above-referenced subject. Ms. Biery's concerns about the site at 19000 Aurora Ave. N. (aka Shoreline P&R) are based on Shoreline's historical facts and data. As she pointed out in her Sept. 26th letter, the SEPA Checklist completed by King County Metro for this site raises issues that need further assessment. Though Save Shoreline Trees' main interest is to preserve the established trees on the hillside on the western edge of the site, we believe that Ms. Biery's information and recommendations in her thorough and detailed evaluation warrants additional review time for the proposed rezoning.

Thank you,

Save Shoreline Trees Board
Melody Fosmore, Co-chair
Kathleen Russell, Co-chair / Treasurer
Susanne Tsoming, Secretary