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**From:** jmhilde <jmhilde61@gmail.com>  
**Sent:** Monday, September 4, 2023 2:23 AM  
**To:** Plancom  
**Subject:** [EXTERNAL] Planning Commission Retreat: Comment on Agenda Item Neighborhood Subarea Planning

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Dear Shoreline Planning Commissioners:

According to the published agenda, the Shoreline Planning Commission will consider Subarea Planning at its retreat on September 7, 2023. As you know, subarea plans provide a way for residents and businesses in these discrete areas to better define and understand how their area fits within the rest of the City and to identify specific goals and objectives for their area.

Here's an example of why subarea planning is so important. The City of Shoreline worked with a Citizen's Advisory Committee from the Southeast Neighborhoods Subarea from July of 2008 until November of 2009 to create a vision and craft policy and zoning recommendations, which resulted in the Southeast Neighborhoods Subarea Plan. The 2016 document found here is a condensed version of their report. (There is no explanation provided for why it took seven years to finalize this document): <https://www.shorelinewa.gov/home/showpublisheddocument/29148/636178323143330000>

As a resident of the Briarcrest neighborhood, which is included in the boundaries of the Southeast Subarea, I was interested to discover this document. However, upon reading it, I was incredibly disappointed to realize that, 14 years after its completion, virtually none of the goals and objectives identified in the Plan, drafted after 17 months of citizen input, have been realized. With that in mind, I respectfully request that the Planning Commission agree to further explore neighborhood subarea planning, focusing particularly on neighborhood subareas such as the southeast part of Shoreline which have historically been ignored when it comes to City investment and inclusion.

Having the City's support for the Southeast Subarea's identified goals and objectives will soon become vitally important because the City is currently finalizing approval of a Master Development Plan (MDP) for the Fircrest School Campus, which is located in the Southeast Subarea bordering the neighborhoods of Briarcrest and Ridgecrest. Large-scale development planned for the southwest and southeast corners of the Campus include a 400-unit low-income apartment building (potentially 1,000 tenants), retail and commercial space with just 217 parking spaces.

While the Fircrest MDP lists among its goals "minimizing impacts on the surrounding neighborhoods",

many of the Southeast Subarea's identified goals and objectives are likely to be negatively impacted by such large-scale development within the Subarea's boundaries, for instance:

~ H3: Distribute low-income housing so that it is not all in one place in the neighborhood, prohibiting the development of large, low-income housing groups or units.

~ H2: New housing development that is added in the center of established neighborhoods of the SE Subarea should be consistent with neighborhood character. Lot size to structure ratios and the scale of building are important.

~ LU4: Establish policies and zoning to provide appropriate transitions between existing and proposed development and dissimilar land uses to minimize conflicts relating to solar access, noise, scale, etc.

~ LU10: Quality of life for current residents in the subarea should be considered in decision-making processes that involve new development in the community, even though decisions must also take into account overall land use goals and the economic needs of the City as a whole.

CD8: Establish density and zoning regulations and design review processes that are flexible enough to allow for creativity in design, but restrictive enough to ensure the protection of the community, especially the immediately adjacent neighbors.

CD9: Use medium- to low-density, multi-family units as transitional areas from high density residential or commercial properties to single-family homes.

CD10: Modify the existing R-48 transition regulations to permit a 50 foot height limit (60 feet through a conditional use process) only if the subject site is adjacent to R-24 or R-48 residential zones or commercial zones and not adjacent to residential zones with a density less than R-24.

ED5: Encourage community groups to define specific types of commercial, retail and professional businesses to best serve needs of subarea residents.

ED8: Continue active participation from the City and the neighboring community in determining most beneficial uses, practices, and mitigation in long-term plans for Fircrest.

Unfortunately, when the Fircrest master planning process was relaunched post-pandemic in 2021 by the Department of Social and Health Services (DSHS), the Fircrest MDP's own guiding principles for citizen participation\* were neglected when none of the neighborhoods bordering the campus were invited to send representatives to the stakeholder meetings. (*Upon being contacted by Briarcrest and Ridgecrest neighbors, DSHS apologized and invited neighborhood representatives to the stakeholder group.*) This oversight felt like a lack of transparency and left neighbors wondering if DSHS and other MDP planning partners could be trusted to abide by the MDP's stated goals of "...minimizing impacts on the surrounding neighborhoods" and "...consider[ing] the surrounding neighborhood context when exploring options for reuse planning on the site's periphery."

According to the Washington State Environmental Health Disparities map (<https://fortress.wa.gov/doh/wtnibl/WTNIBL/>) the portions of the Briarcrest and Ridgecrest neighborhoods which border Fircrest's southern periphery (where the aforementioned large-scale development is planned) are ranked as "high disparity", receiving a 9 on a scale of 1 (lowest disparity) to 10 (highest disparity.) This ranking is based on socioeconomic data (poverty, People of Color, limited English, unemployment, unaffordable housing) as well as environmental exposures and effects. This is the highest disparity ranking in the *entire* city of Shoreline.

Despite the high disparities and despite the high needs of this Subarea, again, very few, if any, of the goals and objectives stated in the 2016 Southeast Neighborhoods Subarea Plan have been realized in the 14 years since the planning group completed its work. And now, with the Fircrest MDP's development plans, the Subarea and its citizens are likely to suffer even more neglect, potentially compounded by the addition of a thousand new neighbors who will similarly find themselves lacking in equity but high in disparity, without City investment or inclusion (or interest) in helping them to achieve their vision of a better life.

Commissioners, I hope this story of the Southeast Neighborhoods provides you with an irrefutable example and a solid reason to support more study of and work on Subarea Planning. Good city-wide planning must begin with the recognition and support of the individual neighborhoods and subareas that are the foundation of the city as a whole.

Sincerely,

Jean Hilde

Briarcrest Neighborhood, Shoreline

\* Citizen Participation Goal CP I: To maintain and improve the quality of life in the community by offering a variety of opportunities for public involvement in community planning decisions.

CP1: Encourage and facilitate public participation in appropriate planning processes, and make those processes user-friendly.

CP7: Educate residents about various planning and development processes, how they interrelate, and when community input will be most influential and effective.