----Original Message-----

From: Janet Way [mailto:janetway@yahoo.com] Sent: Tuesday, September 28, 2004 10:13 PM

To: Andrea Spencer

Subject: RE: Final Version of 2004 Comp Plan Update comments

Hi Andrea,

Could you please replace the one I sent you earlier for Shoreline Environmental Council with this new version. I fixe a bunch of goofy spelling errors and syntax problems. Hope that's OK. I'll give you a new copy too with the other documents.

Thanks fo your help and all you do to keep the Planning Commission going for the people!

Best Regards, Janet Way

Shoreline Environmental Council and Thornton Creek Legal Defense Fund

940 NE 147th St

Shoreline, WA 98155

September 28, 2004

Comments on Shoreline Comp Plan and Master Plans Update

To Whom It May concern:

I represent the Shoreline Environmental Council(SEC) and the Thornton Creek Legal Defense Fund (TCLDF). As such, I wish to present this comment on the Shoreline Comprehensive Plan and Master Plans Updates.

I wish to incorporate by reference the following:

comments by Merilee Catero, Thornton Creek Alliance comments by Ginger Botham "Restore Our Waters" Strategy - City of Seattle Thornton Creek Watershed Basin Characterization Report comments by Shoreline Solar Project report from Eric Pentico of WDFW letter from Tim Stewart Video of Shoreline City Council Meeting Calendar for Washington Recreation and Park Association "Tide Pools" article by Ed Hunt

We are concerned that these documents will create a liklihood of severe adverse impact on our environment and community. We request that the City order an Environmental Impact Study on the effects of these plans on our community for the foreseeable future. We also request that you keep us posted of any and all hearings or notices about the public process for these plans. We request that we be treated as parties of record with legal standing.

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While there may be some positive proposals in these documents such as

EN66 (Item #161) and the new policy ENi (#162) concerning inter jurisdictional coordination in basins that cross jurisdictional boundaries, There are too many serious concerns about the proposed CIP budget which shows a direction being taken by the City, which shows questionable judgments. Our concerns about the direction taken are visualized in the Surface Water Plan's lack of vision for Wildlife Habitat and preserving our natural areas. The community has repeatedly expressed a desire to preserve these areas for the peoples enjoyment and for the value of preserving wildlife habitat.

 Perhaps the most symbolic and problematic indication of this attitude of the City is the degrading of Thornton Creek as fish habitat.

The city knows well the implications of denying this classification to the largest watershed in the city boundaries. This outright denial of this fact, throws every assertion in these documents into doubt. WA State Fish and Wildlife has documented salmonids in Thornton Creek repeatedly, and yet the City staff goes out of it's way to discredit all evidence and documentation of fish habitat. In the SEPA check list, there are numerous opportunities where salmonid presence is denied. (see pages 8 of Parks Plan, There does seem to be some confusion though in the treatment of this issue in the SEPA checklist. On pg. 11 the Comp Plan SEPA. This is completely unacceptable!

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What are our goals?

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- We agree with element EN3, pg 35, "Conduct all City operations in a manner that minimizes adverse environmental impacts. The City should reduce its consumption and waste of energy and materials, minimize (eliminate) use of toxins(s)..." This is good public policy and we suggest that benchmarks be shown each year in a "Report Card" to show the city's progress on this goal.
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We agree with elements EN 54,54, 56, which will be effective strategies to help protect wetlands.

• Vegetation Protection -We disagree with element EN 25, pg 37 which states "IF development is allowed in an environmentally critical area or critical area buffer". This is a very bad policy to be following. It gives the impression that building in critical areas is acceptable or expected. This is VERY BAD PUBLIC POLICY!!!

We recommend this element be changed or removed!

• We disagree with element ENf,pg 42 - "Pursue

obtaining legal access rights, such as easements or ownership to lands needed to maintain, repair or improve portions of the public drainage system that are located on private property and for which the city does not currently have legal access." This will infringe on property owners vested rights. Other means need to be negotiated. Voluntary conservation easements could be offered.

Housing

- We need to ensure that low-income housing is preserved, including zoning for mobile home parks.
- Paramount Park Neighborhood needs to be protected from encroachment by large developments. It is a sensitive area, the largest existing wetland in the city and also provides affordable existing housing.
 Twelfth NE should NOT be allowed to become multiple unit housing ANY further. No more density can be absorbed by these residential streets and critical areas.

Surface Water - see below

Parks - see below

Surface Water Master Plan

Staff has recommended levels of service according to three categories - Flooding, Water Quality, and Habitat.

We have some major concerns about the potential adverse impacts of this plan on salmonids particularly in Thornton Creek.

On pg. 66 of the SWM Plan Staff Report the Priority Levels on Habitat are based on the presence of "anadramous fish" and not salmonids. We believe the Priority Level should be based on "salmonid HABITAT" since that is the indicator of priority for cities to fund programs for improvement, according to State law. Fish habitat is what needs to be protected AND restored. Thornton Creek has abundant opportunity to be restored and is scheduled to have fish passage barriers removed. Therefore City policy and plans should be based on expectation of this habitat being improved and not degraded.

• Thornton Creek, a Class II salmon stream, should be designated as a "Fish and Wildlife Habitat Conservation Area", since it is widely know to be habitat for anadromous salmonids and other fish and many bird species, including priority species. The description of the creek system is inadequate in the SWM Plan book on pg. 11. It does not include details

about different reaches or tributaries as it does other creek systems. This treatment is INSULTING to residents of this watershed which is the largest in the city and connected to the largest watershed in Seattle!!!!!

- Priority Habitat and Species; Salmonids Thornton Creek is not listed here as it should be. It has a long history as a chinook bearing stream and has five species of salmonids. A large Steelhead was sighted in Thornton Creek this winter in Feb. It was videotaped, and confirmed by five fish biologists including a WDFW agent, Eric Pentico and City staff, Andy Loch, and witnessed by a City Councilmember, Maggie Fimia.
- As far as the flooding service level goes, we need to look no further than the case of the residents of North City off of NE 175th and the flooding problems they've experienced. It shows serious miscalculations on the part of the city engineering in implementation of stormwater design. Several of them testified at a City Council meeting 9/20, about their heart-breaking situation which has been only exacerbated by the actions of the city. The Serpentine Lane drainage project which has been touted by the staff as "fixing" the problem has done the exact opposite. These citizens' homes have been rendered uninhabitable by the city's actions.

This case casts doubt upon ALL of the City's assertions about their ability to handle stormwater problems.

There are of course flooding issues all over the city which need to be better addressed. Currently the SWM fee for a single family residence averages \$102. In just 3yrs, the fees will be increasing by over 6%. This is quite a lot of dollars to be charging for a system which arguably is failing on many levels. By your own account the capacity of our creeks and wetlands is already beyond stressed, water quality is low and citizens' properties are being adversely impacted by flooding. Citizens need a better return on their investment than is being offered. More funding needs to be directed towards addressing problems and less spent on "mere beautification" projects.

• Also on pg 68 of the Staff Report in the SWM Capitol Spending Chart shows cost shifting of SWM funding to Parks and Transportation infrastructure. This method of accounting for this spending is confusing and makes the REAL COSTS difficult for citizens to follow. It seems to us that this should be laid out clearly in

one topic or the other, not mixed between different funds. It seems like the Parks budget is being used to pay for stormwater infrastructure, and the SWM budget is being used to justify transportation infrastructure, etc. What is the ACTUAL budget for SWM, Parks,and Transportation? How is Habitat affected by this budgeting? How is the public interest served by this method of accounting?

• Incentives - We suggest that the City undertake a positive "incentivization program" based on partnerships with private and public sector. There are numerous possibilities for improving our stormwater management by encouraging developers of new projects and existing property owners to upgrade their impervious surfaces to pervious, either by replacing old ones or creating "natural drainage strategies". Some good examples of this are being tried out in Seattle and King County. (see "Restore Our Waters Strategy" enclosed, under "partnerships").

This has the potential to really solve some drainage problems by removing some of the runoff and having more of it "infiltrate" into the ground. It might also save precious dollars otherwise spent on repairs or litigation. Tax incentives could be provided to property owners who take advantage of this strategy.

Parks, Rec, and Cult. Services Master Plan

We have many questions and concerns about some of the policies proposed in the Parks and Rec Master Plan.

• Some of our concerns are reflected in the apparent plan to utilize parks even more than they're now used for stormwater detention. While we realize that there IS a nexus between parks and stormwater, since many of them have critical areas such as creeks and wetlands on site, neither should the parks be used as "dumping grounds" for our polluted waters coming off our streets and impervious surfaces. It's widely known that toxics are a major cause of threats to human health and degradation of our wildlife habitat. Therefore adequate stormwater detention and infrastructure must be provided by any NEW development as the city fixes inadequate stormwater facilities and restores our critical area resources. Parks should either be funded properly to provide this

Parks should either be funded properly to provide this service without negatively impacting their other responsibilities OR SWM must provide it by charging fees for new development, applying for grants or partnering with agencies and the private sector. Rate payers should not be expected to make up the difference and pay for mistakes of past development or

oversight from governments.

- We also have serious concerns and questions about the lack of emphasis in the Parks Plan on habitat and enhancing "natural areas". It's a well established fact that a majority of citizens who use parks do so for passive uses OR for individual recreation. According to the Parks Plan, pg 34 the Top 10 Activities chart, individual sport activities were the most popular, including exercise walking, fishing, bicycle riding, and hiking. These are all activities to be pursued in natural area parks. As shown in industry studies passive recreation is BY FAR the most popular use for parks! (see "TOP 15 MOST POPULAR SPORTS AS RANKED BY THE NATIONAL SPORTING GOODS ASSOCIATION Calendar, publ. by Wash Rec & Park Assoc. [enclosed]) Citizens count on "natural areas" to provide enjoyment of nature, quiet reflection and family time. Again, according to the City Parks Plan, in surveys and focus groups as shown on pgs, 42 and 44, citizens crave natural areas, small neighborhood parks and walking and biking trails more than other types of parks. They appreciate the chance to enjoy the natural world in the city. Therefore funding and emphasis for the budget should favor these types of parks and activities most desired by citizens.
- Wildlife corridors have also been shown to be a vital link within the urban areas for wildlife survival. Many bird, fish, amphibian and small mammal species depend on wildlife corridors to survive. The Best Available Science standard requires that our Parks and SWM Plans preserve these wildlife corridors for Priority Habitat. Many of our parks can provide this natural area component and it could be expanded with out great expense. There is a great deal of public support for this policy.

These parks include -Paramount Park Natural Area. Saltwater Park (natural aspects need to be better emphasized), Hamlin Park. Ronald Bog, Cromwell Park, Meridian Park. Darnell Open Space, Twin Ponds Park, Northcrest Park. North City Park, Bruggers Bog. Boeing Creek Park, Innis Arden Reserve, Shoreview Park, Echo Lake Park, etc.

Additionally, some other areas could be added as

openspace and be further enhanced. These areas could provide more wildlife corridors, better infiltration of stormwater and enhanced passive recreation activities.

These would include:

properties surrounding Paramount Park Open Space, "Seventeen Acres" (next to Shorecrest HS), portions of Fircrest Property, "The Bowl" north of Hamlin Park, Kruckeberg Botanical Garden, Beach areas for public access, "triangle area" next to proposed pedestrian bridge on Aurora, and others.

Additionally, preserving and enhancing wildlife habitat, including improving and restoring buffers for critical areas should be emphasized. Sedimentation in streams caused by runoff should be prevented and siltation should be controlled. Wetland function should also restored where possible by removing fill. Impervious surfaces should be replace where possible with natural drainage and vegetation.

• We suggest that wildlife and plant surveys should be done in the park which include accurate mapping of plant and animal communities. This work could be provided by volunteers if well organized. There are many avid "birders" and other amateur experts in Shoreline who'd love the opportunity. Surveys have been done in the past by Shoreline Community College student, and more could be commissioned with the help of consultants. In Seattle, "Nature Mapping" has been undertaken by private organizatio to accurately map plant communities. (contact: Seattle Urban Nature Project 5218 University Way NE Seattle, WA 98105 Phone: (206) 522-0334

E-mail: info@seattleurbannature.org

This excellent organization could be cotracted to provide more detailed information than is now available.

Also, the "benthic index" or "bug count" for our streams and wetlands should be taken and analyzed to indicate the real water quality.

• Our Parks should be "Toxic Free Zones". The city should eliminate them by phasing out ALL toxics, including pesticides, herbicides, fungicides, non-natural fertilizers and any other toxic uses. All uses of toxics in critical area buffers should be stopped immediately. "Integrated-pest-management" which seeks to truly limit and phase out these product uses should be the method employed by the City. Also,

uses of toxics should be phased out in areas close to parks as well as other public spaces. The city should also work toward developing sustainable methods and Best Management Practices for maintenance of equipment which uses toxic materials. For instance, leaf blower use should be phased out because of air pollution and noise pollution. Alternatives should be sought to these technologies which are less intrusive and which are not toxic to wildlife of people, especially where children are likely to be present.

- "No Spray Zones" should be extended city-wide. It should not be the default that residents have to be subjected to poison unless they request NOT to be! The pilot program from Richmond Beach should be extended all over town. There's just no justification for spraying pesticides on our streets which then washes directly into our streams and drifts into people's yards where their children and pets play. Manual maintenance can be substituted.
- •More emphasis should be given to our trees in general in the report. When we think of parks, naturally we think of trees as a vital part of the landscape. Trees provide numerous benefits of course, to our community; including shade, air pollution control, wildlife habitat, water retention and infiltration from rain. fruits and nuts, and of course aesthetic reasons. Conifers provide enormous benefits for stormwater retention. Up to 50% of the precipitation which falls on coniferous trees never reaches the ground. When trees are cut down for safety reasons "snags" should be created from a"topped" tree for benefit of woodpeckers and other species. Large woody debris created by any needed cutting or pruning should be added to wetland areas and within riparian areas where practical. Large old-growth or second-growth trees should be preserved whenever possible and heritage trees should be identified and cataloged. Rare plants and native plant areas should be inventoried to know what areas are most fragile to intrusion. Vegetation in general is not given much attention in the Parks Plan. Plants are, of course crucial to wildlife habitat. Native plants, once established provide a low maintenance alternative, beauty and provide the right environment for native plants and animals.

There are many CIP and Openspace Acquisition projects proposed in the Staff Report, but many raise more questions than they answer. For instance:

Paramount Park is listed in the staff report for a project for removal of rubble, etc. with a suggested budget of \$250,000! Paramount Park Neighborhood Group suggested this idea originally and proposed to do it with a grant from King County Waterworks, for about

\$10,000. What would cost \$250K? We can do these types of projects with volunteer labor for much less, with "buy-in" from the community.

• Some wildlife habitat has already been lost such as at Peverly Pond where the pond has been allowed to disappear due to development impacts. This was a former privately owned park open to the public, but now a private developer has severely limited any access by the public. Instead the private developer is being permitted by the city to use the public park next door for it's mitigation project instead of doing required mitigation on site. This is in effect a "privatization" of our park resource. It is NOT a good trend for us to be following.

Transportation Master Plan

We have major concerns as to how the transportation plan will effect our stormwater. Many experts in the engineering fields are now looking at ways to promote "zero impact development". This is not only a feasible concept but is becoming the state of the art. We believe the city should employ these techniques in any new road treatments or transportation solutions, as well as work toward this goal in it's planning and development departments. One of the chief proponents of this technology philosophy is the SCA Consulting Group.

(see enlosed article from Tide Pool, 1/99 http://www.tidepool.org/hp/hpbigidea.cfm) Contact
SCA Design|Build and Consulting Group P.O. Box 3485
Lacey, WA 98509-3485
360-493-6002 Phone
360-493-2476 Fax sca@scaconsultinggroup.com

- More alternatives to impervious surfaces should be explored for our roads, paths and sidewalks. "SEAstreets " types of sidewalk/natural drainage solutions should be pursued and implemented, especially for creeks which are currently in pipes or roadside ditches. This is a nationally recognized alternative program, originating at Seattle Public Utilities, which enhances pedestrian pathways while providing huge benefits for stormwater infiltration and detention. (See "incentives" above in SWM section)
- Better pedestrian connections must be made throughout our community.
 Surveys taken by the City show overwhelming desire in the community for better safer streets with pedestrian improvements. These should be concentrated near parks,

schools and school crossing areas. Also they can be done in conjunction with the above SEAstreet treatments. Grant funding can be applied for with the above programs to improve stormwater and solve two problems at once. Also, as above developers can be encouraged with incentives to do this more sustainable drainage/pedestrian connections.

- Development should be encouraged to provide better"connectivity" by eliminating fencing which cuts off one project from adjacent ones and prevents pedestrian access. An example of one place which could have been designed better is the Top Foods project and its lack of connectivity to the multi-family housing next door. Residents of the housing must now walk way out of their way to get to the store for their shopping needs. This is NOT a good way to encourage walking instead of driving.
- Economic impacts to existing businesses should always be taken into account and sensitivity to their needs MUST be considered when proposals are made by the city for "improvements". Aurora Ave. N and North City are of course prime examples. In one case medians are deemed crucial and in the other they are deemed "dangerous". It seems that different standards are being applied to to rationalize one or the other.
- "Cut-thru traffic" is a subject of great concern from citizens and the resulting speeding in residential areas. Policies that result in this impact to neighborhoods should be changed. Traffic lights for pedestrians should be provided where high accidents rates have occurred such as Fifteenth NE at 170th NE next to the 7-11 Store.

Please accept our comments and consider them seriously!

Respectfully Submitted,

Janet Way, President Thornton Creek Legal Defense Fund and Representative for Shoreline Environmental Council

--- Andrea Spencer <aspencer@ci.shoreline.wa.us> wrote:

- > Your comment letter has been received and will be
- > added to the public record.

> Regards,

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> Andrea L. Spencer, AICP
> Senior Planner
> City of Shoreline
> 206.546.1418
> Fax 206.546.8761
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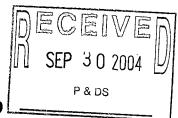
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SHORELINE ENVIRONMENTAL COUNCIL AND THORNTON CREEK LEGAL DEFENSE FUND

940 NE 147th St

Shoreline, WA 98155

September 28, 2004

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REVISED REVISED PUBLIC COMMENT 124

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We agree with elements EN 54,54, 56, which will be effective strategies to help protect wetlands.

- Vegetation Protection -We disagree with element EN 25, pg 37 which states "IF development is allowed in an environmentally critical area or critical area buffer". This is a very bad policy to be following. It gives the impression that building in critical areas is acceptable or expected. This is VERY BAD PUBLIC POLICY!!! We recommend this element be changed or removed!
- We disagree with element ENf,pg 42 "Pursue obtaining legal access rights, such as easements or ownership to lands needed to maintain, repair or improve portions of the public drainage system that are located on private property and for which the city does not currently have legal access." This will infringe on property owners vested rights. Other means need to be negotiated. Voluntary conservation easements could be offered.

Housing

- We need to ensure that low-income housing is preserved, including zoning for mobile home parks.
- Paramount Park Neighborhood needs to be protected from encroachment by large developments. It is a sensitive area, the largest existing wetland in the city and also provides affordable existing housing. Twelfth NE should NOT be allowed to become multiple unit housing ANY further. No more density can be absorbed by these residential streets and critical areas.

Surface Water - see below

Parks - see below

Surface Water Master Plan

Staff has recommended levels of service according to three categories - Flooding, Water Quality, and Habitat.

We have some major concerns about the potential adverse impacts of this plan on salmonids particularly in Thornton Creek.

On pg. 66 of the SWM Plan Staff Report the Priority Levels on Habitat are based on the presence of "anadramous fish" and not salmonids. We believe the Priority Level should be based on "salmonid **HABITAT**" since that is the indicator of priority for cities to fund programs for improvement, according to State law. Fish habitat is what needs to be protected AND restored. Thornton Creek has abundant opportunity to be restored and is scheduled to have fish passage barriers removed. Therefore City policy and plans should be based on expectation of this habitat being improved and not degraded.

- Thornton Creek, a Class II salmon stream, should be designated as a "Fish and Wildlife Habitat Conservation Area", since it is widely know to be habitat for anadromous salmonids and other fish and many bird species, including priority species. The description of the creek system is inadequate in the SWM Plan book on pg. 11. It does not include details about different reaches or tributaries as it does other creek systems. This treatment is INSULTING to residents of this watershed which is the largest in the city and connected to the largest watershed in Seattle!!!!!!
- Priority Habitat and Species; Salmonids Thornton Creek is not listed here as it should be. It has a long history as a chinook bearing stream and has five species of salmonids. A large Steelhead was sighted in Thornton Creek this winter in Feb. It was videotaped, and confirmed by five fish biologists including a WDFW agent, Eric Pentico and City staff, Andy Loch, and witnessed by a City Councilmember, Maggie Fimia.
- As far as the **flooding** service level goes, we need to look no further than the case

of the residents of North City off of NE 175th and the flooding problems they've experienced. It shows serious miscalculations on the part of the city engineering in implementation of stormwater design. Several of them testified at a City Council meeting 9/20, about their heart-breaking situation which has been only exacerbated by the actions of the city. The Serpentine Lane drainage project which has been touted by the staff as "fixing" the problem has done the exact opposite. These citizens' homes have been rendered uninhabitable by the city's actions.

This case casts doubt upon ALL of the City's assertions about their ability to handle stormwater problems.

There are of course flooding issues all over the city which need to be better addressed. Currently the SWM fee for a single family residence averages \$102. In just 3yrs, the fees will be increasing by over 6%. This is quite a lot of dollars to be charging for a system which arguably is failing on many levels. By your own account the capacity of our creeks and wetlands is already beyond stressed, water quality is low and citizens' properties are being adversely impacted by flooding. Citizens need a better return on their investment than is being offered. More funding needs to be directed towards addressing problems and less spent on "mere beautification" projects.

- Also on pg 68 of the Staff Report in the SWM Capitol Spending Chart shows cost shifting of SWM funding to Parks and Transportation infrastructure. This method of accounting for this spending is confusing and makes the REAL COSTS difficult for citizens to follow. It seems to us that this should be laid out clearly in one topic or the other, not mixed between different funds. It seems like the Parks budget is being used to pay for stormwater infrastructure, and the SWM budget is being used to justify transportation infrastructure, etc. What is the ACTUAL budget for SWM, Parks, and Transportation? How is Habitat affected by this budgeting? How is the public interest served by this method of accounting?
- Incentives We suggest that the City undertake a positive "incentivization program" based on partnerships with private and public sector. There are numerous possibilities for improving our stormwater management by encouraging developers of new projects and existing property owners to upgrade their impervious surfaces to pervious, either by replacing old ones or creating "natural drainage strategies". Some good examples of this are being tried out in Seattle and King County. (see "Restore Our Waters Strategy" enclosed, under "partnerships"). This has the potential to really solve some drainage problems by removing some of the runoff and having more of it "infiltrate" into the ground. It might also save precious dollars otherwise spent on repairs or litigation. Tax incentives could be provided to property owners who take advantage of this strategy.

Parks, Rec, and Cult. Services Master Plan

We have many questions and concerns about some of the policies proposed in the Parks and Rec Master Plan.

- Some of our concerns are reflected in the apparent plan to utilize parks even more than they're now used for stormwater detention. While we realize that there IS a nexus between parks and stormwater, since many of them have critical areas such as creeks and wetlands on site, neither should the parks be used as "dumping grounds" for our polluted waters coming off our streets and impervious surfaces. It's widely known that toxics are a major cause of threats to human health and degradation of our wildlife habitat. Therefore adequate stormwater detention and infrastructure must be provided by any NEW development as the city fixes inadequate stormwater facilities and restores our critical area resources.
- Parks should either be funded properly to provide this service without negatively impacting their other responsibilities OR SWM must provide it by charging fees for new development, applying for grants or partnering with agencies and the private sector. Rate payers should not be expected to make up the difference and pay for mistakes of past development or oversight from governments.
- We also have serious concerns and questions about the lack of emphasis in the Parks Plan on habitat and enhancing "natural areas". It's a well established fact that a majority of citizens who use parks do so for passive uses OR for individual recreation. According to the Parks Plan, pg 34 the Top 10 Activities chart, individual sport activities were the most popular, including exercise walking, fishing, bicycle riding, and hiking. These are all activities to be pursued in natural area parks. As shown in industry studies passive recreation is BY FAR the most popular use for parks! (see "TOP 15 MOST POPULAR SPORTS AS RANKED BY THE NATIONAL SPORTING GOODS ASSOCIATION Calendar, publ. by Wash Rec & Park Assoc. [enclosed]) Citizens count on "natural areas" to provide enjoyment of nature, quiet reflection and family time. Again, according to the City Parks Plan, in surveys and focus groups as shown on pgs, 42 and 44, citizens crave natural areas, small neighborhood parks and walking and biking trails more than other types of parks. They appreciate the chance to enjoy the natural world in the city. Therefore funding and emphasis for the budget should favor these types of parks and activities most desired by citizens.
- Wildlife corridors have also been shown to be a vital link within the urban areas for wildlife survival. Many bird, fish, amphibian and small mammal species depend on wildlife corridors to survive. The Best Available Science standard requires that our Parks and SWM Plans preserve these wildlife corridors for Priority Habitat. Many of our parks can provide this natural area component and it could be expanded with out great expense. There is a great deal of public support for this policy.

These parks include - Paramount Park Natural Area,

Saltwater Park (natural aspects need to be better emphasized),
Hamlin Park,
Ronald Bog,
Cromwell Park,
Meridian Park,
Darnell Open Space,
Twin Ponds Park,
Northcrest Park,
North City Park,
Bruggers Bog,
Boeing Creek Park,
Innis Arden Reserve,
Shoreview Park,
Echo Lake Park, etc.

 Additionally, some other areas could be added as openspace and be further enhanced. These areas could provide more wildlife corridors, better infiltration of stormwater and enhanced passive recreation activities.

These would include:

properties surrounding Paramount Park Open Space,

"Seventeen Acres" (next to Shorecrest HS),

portions of Fircrest Property,

"The Bowl" north of Hamlin Park,

Kruckeberg Botanical Garden,

Beach areas for public access,

"triangle area" next to proposed pedestrian bridge on Aurora, and others.

Additionally, preserving and enhancing wildlife habitat, including improving and restoring buffers for critical areas should be emphasized. Sedimentation in streams caused by runoff should be prevented and siltation should be controlled. Wetland function should also restored where possible by removing fill. Impervious surfaces should be replace where possible with natural drainage and vegetation.

• We suggest that wildlife and plant surveys should be done in the parks which include accurate mapping of plant and animal communities. This work could be provided by volunteers if well organized. There are many avid "birders" and other amateur experts in Shoreline who'd love the opportunity. Surveys have been done in the past by Shoreline Community College student, and more could be commissioned with the help of consultants. In Seattle, "Nature Mapping" has been undertaken by private organization to accurately map plant communities. contact:

Seattle Urban Nature Project 5218 University Way NE Seattle, WA 98105
Phone: (206) 522-0334

E-mail: info@seattleurbannature.org

This excellent organization could be cotracted to provide more detailed information than is now available.

Also, the "benthic index" or "bug count" for our streams and wetlands should be taken and analyzed to indicate the real water quality.

- Our Parks should be "Toxic Free Zones". The city should eliminate them by phasing out ALL toxics, including pesticides, herbicides, fungicides, non-natural fertilizers and any other toxic uses. All uses of toxics in critical area buffers should be stopped immediately. "Integrated-pest-management" which seeks to truly limit and phase out these product uses should be the method employed by the City. Also, uses of toxics should be phased out in areas close to parks as well as other public spaces. The city should also work toward developing sustainable methods and Best Management Practices for maintenance of equipment which uses toxic materials. For instance, leaf blower use should be phased out because of air pollution and noise pollution. Alternatives should be sought to these technologies which are less intrusive and which are not toxic to wildlife of people, especially where children are likely to be present.
- "No Spray Zones" should be extended city-wide. It should not be the default that residents have to be subjected to poison unless they request NOT to be! The pilot program from Richmond Beach should be extended all over town. There's just no justification for spraying pesticides on our streets which then washes directly into our streams and drifts into people's yards where their children and pets play. Manual maintenance can be substituted.
- •More emphasis should be given to our trees in general in the report. When we think of parks, naturally we think of trees as a vital part of the landscape. Trees provide numerous benefits of course, to our community; including shade, air pollution control, wildlife habitat, water retention and infiltration from rain, fruits and nuts, and of course aesthetic reasons. Conifers provide enormous benefits for stormwater retention. Up to 50% of the precipitation which falls on coniferous trees never reaches the ground. When trees are cut down for safety reasons "snags" should be created from a"topped" tree for benefit of woodpeckers and other species. Large woody debris created by any needed cutting or pruning should be added to wetland areas and within riparian areas where practical. Large old-growth or second-growth trees should be preserved whenever possible and heritage trees should be identified and cataloged. Rare plants and native plant areas should be inventoried to know what areas are most fragile to intrusion. Vegetation in general is not given much attention in the Parks Plan. Plants are, of course crucial to wildlife habitat. Native plants, once established provide a low maintenance alternative, beauty and provide the right environment for native plants and animals.

There are many CIP and Openspace Acquisition projects proposed in the Staff Report, but many raise more questions than they answer. For instance:

Paramount Park is listed in the staff report for a project for removal of rubble, etc. with a suggested budget of \$250,000! Paramount Park Neighborhood Group suggested this idea originally and proposed to do it with a grant from King County Waterworks, for about \$10,000. What would cost \$250K? We can do these types of projects with volunteer labor for much less, with "buy-in" from the community.

• Some wildlife habitat has already been lost such as at Peverly Pond where the pond has been allowed to disappear due to development impacts. This was a former privately owned park open to the public, but now a private developer has severely limited any access by the public. Instead the private developer is being permitted by the city to use the public park next door for it's mitigation project instead of doing required mitigation on site. This is in effect a "privatization" of our park resource. It is NOT a good trend for us to be following.

Transportation Master Plan

We have major concerns as to how the transportation plan will effect our stormwater. Many experts in the engineering fields are now looking at ways to promote "zero impact development". This is not only a feasible concept but is becoming the state of the art. We believe the city should employ these techniques in any new road treatments or transportation solutions, as well as work toward this goal in it's planning and development departments. One of the chief proponents of this technology philosophy is the SCA Consulting Group. (see enlosed article from Tide Pool, 1/99

Contact

SCA Design|Build and Consulting Group P.O. Box 3485 Lacey, WA 98509-3485 360-493-6002 Phone 360-493-2476 Fax sca@scaconsultinggroup.com

http://www.tidepool.org/hp/hpbigidea.cfm)

• More alternatives to impervious surfaces should be explored for our roads, paths and sidewalks. "SEAstreets" types of sidewalk/natural drainage solutions should be pursued and implemented, especially for creeks which are currently in pipes or roadside ditches. This is a nationally recognized alternative program, originating at Seattle Public Utilities, which enhances pedestrian pathways while providing huge benefits for stormwater infiltration and detention. (See "incentives" above in SWM section)

- Better *pedestrian connections* must be made throughout our community. Surveys taken by the City show overwhelming desire in the community for better safer streets with pedestrian improvements. These should be concentrated near parks, schools and school crossing areas. Also they can be done in conjunction with the above SEAstreet treatments. Grant funding can be applied for with the above programs to improve stormwater and solve two problems at once. Also, as above developers can be encouraged with incentives to do this more sustainable drainage/pedestrian connections.
- Development should be encouraged to provide better "connectivity" by eliminating fencing which cuts off one project from adjacent ones and prevents pedestrian access. An example of one place which could have been designed better is the Top Foods project and its lack of connectivity to the multi-family housing next door. Residents of the housing must now walk way out of their way to get to the store for their shopping needs. This is NOT a good way to encourage walking instead of driving.
- Economic impacts to existing businesses should always be taken into account and sensitivity to their needs MUST be considered when proposals are made by the city for "improvements". Aurora Ave. N and North City are of course prime examples. In one case medians are deemed crucial and in the other they are deemed "dangerous". It seems that different standards are being applied to to rationalize one or the other.
- "Cut-thru traffic" is a subject of great concern from citizens and the resulting speeding in residential areas. Policies that result in this impact to neighborhoods should be changed. Traffic lights for pedestrians should be provided where high accidents rates have occurred such as Fifteenth NE at 170th NE next to the 7-11 Store.

Please accept our comments and consider them seriously!

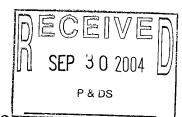
Respectfully Submitted,

Janet Way, President

Thornton Creek Legal Defense Fund

and Representative for Shoreline Environmental Council

ENCLOSED PLEASE FIND -

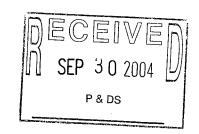


- 1. comments by Merilee Catero, Thornton Creek Alliance
- 2. comments by Ginger Botham
- **3.** report from Eric Pentico of WDFW
- 4. letter from Tim Stewart
- 5. "Restore Our Waters" Strategy City of Seattle
- **6.** "Tide Pools" article by Ed Hunt
- 7. Website page for Seattle Urban Nature Project
- 8. Calendar for Washington Recreation and Park Association
- 9. comment by Terry De Lavallade

(NOT INCLUDED BUT INCORPORATED BY REFERENCE)

- 10. Thornton Creek Watershed Basin Characterization Report
- 11. comments by Shoreline Solar Project
- 12. Video of Shoreline City Council Meeting 9/20

June 9, 2004 **DRAFT**



City of Shoreline

Master Plans and Comprehensive Plan Update

17544 Midvale Ave. N.

Shoreline, WA 98133

To Whom It May Concern:

Thornton Creek Alliance is submitting these comments on the City of Shoreline's Draft Comprehensive Plan Update (May 6, 2004 version), Draft Surface Water Master Plan (April 2004 version) and Draft Parks, Recreation and Open Space Plan (May 6, 2004 version). We have previously commented on the same plans at the Thornton Creek Watershed Oversight Council, where both we and the City are active participants, joined by other stakeholders and government agencies working in the basin.

We want to begin by expressing our appreciation for the City's participation on the Watershed Oversight Council. We believe this participation is consistent with the proposed amendment to the City's policy EN66 (Item #161) and the new policy ENi (#162) concerning interjurisdictional coordination in basins that cross jurisdictional boundaries and we urge the City's adoption of these two policies.

We support nearly all of the City's proposed policies for habitat, water quality and flooding. We would like to express particularly strong support for the emphasis on maintaining hydrological and ecological processes in Goal EN VI (#139), the commitment to basin stewardship in amended policy EN57 (#153) and the support for "green street" improvements in amended policy EN39 (#170). We also strongly support retaining existing policies EN42

(#173), which favors low-impact approaches to development, and EN43 (#174), which stresses the importance of maintaining and enhancing natural drainage systems to provide multiple downstream benefits. We strongly disagree with the workgroup suggestions to eliminate these policies. Our primary suggested policy change would be to amend Goal ENV (#164) so that it does not

City of Shoreline

June 9, 2004

Page Two

identify only the two choices of engineered solutions or preservation of natural systems to achieve stormwater and habitat goals. This ignores the entire movement toward "Natural Approaches to Stormwater Management" being promoted by the Puget Sound Water Quality Action Team. These approaches are often more effective than engineered solutions, with lower long-term maintenance costs. They also typically provide multiple benefits, including improved water quality and wildlife habitat, consistent with the proposed amendment to policy EN46 (#177) on surface water facilities, which we support. The Action Team has produced an excellent guide on this topic, available on the internet at

http://www.psat.wa.gov/Publications/LID_studies/LID_approaches.htm, which provides many different examples from around the region.

We are concerned that the Draft Surface Water Master Plan does not actually include a recommended plan. We urge the City to provide early opportunities for comment and discussion on the plan it is developing at the Thornton Creek Watershed Oversight Council. We also are disappointed that the draft plan's identification of habitat problems is "limited to a cursory review of information provided by the City," with "no field reconnaissance or engineering analysis was performed to assess specific problems" (p.79). This is a serious deficiency and must be corrected, at least for high priority actions, in the final plan. For projects in the Thornton Creek basin, we suggest

reviewing the draft Thornton Creek Watershed Action Plan and discussing these issues with the Watershed Oversight Council. As Thornton Creek Alliance noted in our comments on the City's Basin Characterization Report, we especially want to stress that there are many opportunities for habitat improvements at Twin Ponds Park, which could benefit fish and many different species of birds and wildlife. Additionally, though we recognize the importance of habitat improvements in Boeing Creek, we believe that prioritizing \$4 million to projects there ahead of habitat improvements anywhere else in the City (Table 7-3, p.82) is inappropriate, given that surface water fees are generated throughout the City.

We want to express our appreciation for the plan's recognition of the need for major drainage improvements in the vicinity of Ronald Bog. We agree with the high priority given these improvements and urge that the City also view them as opportunities for improving habitat and water quality at these same locations.

On a factual note, the Draft Surface Water Plan should be corrected concerning its statement that only McAleer and Boeing Creeks have additional salmonid species beside cutthroat trout. Bob Vreeland and Eric Pentico, the Washington Department of Fish and Wildlife's Area Habitat Biologist, identified an adult steelhead in Thornton Creek upstream of Twin Ponds and NE 155th on February 4, 2004. We have forwarded an e-mail with details to City staff.

City of Shoreline

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Page Three

Lastly, we accept the word of City staff that it was an oversight that the Draft Surface Water Plan continues to use the phrase "artificial open water course" in referring to parts of Thornton and other creeks, even after the Planning

Commission specifically directed City staff to eliminate that term from its basin reports on the grounds that it is undefined and misleading. We expect this to be corrected in the final Plan.

As to the City's Parks and Open Space Plan, we appreciate and share the high priority Shoreline citizens have placed on improvements to the City's natural areas. We strongly agree with the statement on page 130 that "there is a high need for habitat enhancements [in the City's natural area parks] as well as vegetation enhancement where invasive vegetation has negatively impacted the resource." Though we agree with the plan that the City should seek grants and volunteer labor to support these improvements, we also believe they merit allocations from the City's general fund.

We agree that the trail system and pond overlooks at Twin Ponds Park should be improved (p.119). We also agree with the general approach to improvements at Ronald Bog Park listed on page 120, as well as the proposal for the City's capital budget in 2005 to complete a master plan for Ronald Bog Park (Table 16, p. 133). We look forward to working with the City to develop more details for the Conceptual Plan for Ronald Bog shown in Figure 21 on page 153.

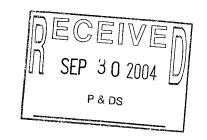
We intend to participate in the City's upcoming workshops on its Comprehensive Plan and Surface Water and Parks plans. Thank you for the opportunity to provide written comments at this stage. We look forward to working with the City to improve habitat and water quality and address flooding and erosion problems, which would benefit City residents as well as the Thornton Creek ecosystem.

Sincerely,

Merilee Catero President

Ginger Botham Comments

From Ginger Botham
16334 Linden Avenue North
Shoreline, WA 98133-5620
206-542-7793
foxdusty@yahoo.com



Comments - 2004 Draft Comprehensive Plan Email to: masterplan@ci.shoreline.wa.us

City of Shoreline - Transportation Master Plan Draft Report - April 2004 - Prepared by Mirai Associates

- 1. Page 2-6 of City of Shoreline Transportation Master Plan Draft Report April 2004 Prepared by Mirai Associates and page 107 of Draft Comprehensive Plan 2004 Update dated 5/6/04 use the same map titled Existing Average Weekday Traffic Volumes (2000-2002). At the bottom of each map page near the center is a number, either 24,700 or 24.70 depending on which document you look at. I suspect all the numbers on that bottom line are supposed to be in the number format 00,000 and not 00.00. Please standardize the format and confirm the numbers. Please explain the numbers.
- Page 3-4 of City of Shoreline Transportation 2. Master Plan Draft Report - April 2004 - Prepared by Mirai Associates. Look at Figure 3-2. There is no traffic data, not for today and not projected for 2022 on 165th west of SR99 (Aurora). 165th at Aurora is scheduled to receive a red-yellow-green traffic light and 165th is slated to become a collector arterial (see figure 6-1) to west Shoreline and Shoreline Community College. You need traffic data and planning There has been a NTSP on this for this street NOW. street for two years, and I believe it was included in traffic data collection by Shoreline Community College Master Plan so please collect existing data from these two sources and schedule this street for more data collection/forecast. Please do the same for 160th west of Aurora.
- 3. Page 6-1 of City of Shoreline Transportation

Master Plan Draft Report - April 2004 - Prepared by Mirai Associates. Look at Goal T A "Provide safe and friendly streets for Shoreline citizens." Goal T O: "Make safety the first priority of citywide transportation planning and traffic management. Place a higher priority on pedestrian, bicycle, and automobile safety over vehicle capacity improvements at intersections."

At every location you consider installing traffic circles or roundabouts, CAREFULLY evaluate pedestrian, cycle and senior safety FIRST. If your 'fix' moves traffic more quickly but greatly increases danger for pedestrians, cyclists, and seniors then the 'fix' is Our city's goal is a more walkable not a good fix. city and greater use of non-car modes of I understand that pedestrian safety transportation. is sometimes theoretically improved in traffic circle-roundabout situations if the crosswalks are moved away from the traffic circles. This 'fix' greatly increases the distance pedestrians must travel and puts the crosswalks in an unfamiliar and not-visible-till-after-you-turn-the-corner location. Roundabouts on busy arterials can be more dangerous for us 'chickens' outside the car. Only put traffic circles/roundabouts in locations REQUESTED by the users.

Page 6-12 (figure 6-3) of City of Shoreline -Transportation Master Plan Draft Report - April 2004 -Prepared by Mirai Associates shows proposed roundabout locations for the west side of Shoreline. I am on the Shoreline Community College Master Plan Task Force and its traffic subcommittee. One of the intersection fixes being proposed by Shoreline College is a roundabout at 160-Greenwood-Innis Arden Way. proposed by a single task force member and accepted by the first (now fired) traffic consultant and the task force as an option to be investigated, not as an option to be adopted. The second traffic consultant and the college have received more than 100 responses to 8 proposed fixes for this intersection. The roundabout proposal received a few but NOT a majority or even a large minority of the "I like this option" responses at the open house. It was near the bottom of the "I like" list. It would be arrogant of the city to impose a roundabout at this location without

community support. I am enclosing a copy of the May 27th, 2004 Shoreline Community College Community Task Force Access Working Group(AWG) with its summary of the April 8th Open House comments. Note that 15 of the 22 roundabout comments showed the roundabout option to be undesirable/unacceptable. I request that you have Andrea Spencer and Paul Haines (city staff) who also attend this task force to provide all 160-Greenwood-Innis Arden results from this task force to become part of the community comments on roundabouts. (also see Page 6-16 (Table 6-5) Ginger's item # 49)

- 5. Page 6-11 (figure 6-2) of City of Shoreline Transportation Master Plan Draft Report April 2004 Prepared by Mirai Associates shows proposed roundabout locations for the east side of Shoreline. I hear from neighbors who are active in their neighborhoods that there is interest and petitions requesting roundabouts on 183rd at Stone and Wallingford. Please investigate community support for roundabouts in these locations.
- Page 6-16 (Table 6-5) of City of Shoreline -6. Transportation Master Plan Draft Report - April 2004 -Prepared by Mirai Associates lists First and Second Priority Pedestrian Projects. A pedestrian walkway for 165th between Aurora and Shoreline Community College (and also walking route to Shorewood High School) is NOT LISTED as needing a walkway because somewhere else in our Comp Plan (Page 118 Figure TR-5) it says that 165th west of Aurora already has a real Trust me on this one. 165th west of Aurora sidewalk. does NOT have a sidewalk although when 165th becomes a collector arterial and 165th/Aurora has a full red-yellow-green traffic light it will be extremely dangerous because there is no sidewalk. Please add 165th from Aurora to Dayton to Table 6-5 / First and Second Priority Pedestrian Projects.

Draft Comprehensive Plan 2004 Update

7. Page 4 lists "Aurora at N 175th Street to N 185th Street would serve as a civic hub.

Well, folks, we are still waiting to hear where you

plan to build our new City Hall (\$20 million estimated cost) whether we want it or not. This is planned to be built with councilmanic bonds (no public vote) and the City Council from the beginning has wanted to slash and burn east Richmond Highlands and replace it The first Comp Plan proposed with a City Center. (without telling Shoreline School District) that Shoreline Center and Shorewood High School swap functions (a costly and intrusive venture ... tail wagging the dog). Richmond Highlands fought you loudly and publicly and you removed the City Center /City Hall designation from Richmond Highlands during the last Comp Plan. And now it has returned. who helped site the new Shoreline Fire Station now regrets that it was placed on valuable commercial land that can never generate tax dollars for our city. Plonking the "Civic Hub/City Hall" in the same area will continue the conversion of tax generating commercial land into non-tax-dollar generating grandiose public buildings. And it will reflect a broken promise to Richmond Highlands at the last Comprehensive Plan forums.

- 8. Figure 1-1 Vision Map (page 5) has a cute little key with adorable icons. However, this map looks like it was developed in color, not black/white. The icons for the college and transit routes (2 icons) have vanished from both the map and the key when printed in black/white. Fix the map, please, so we can see what is supposed to be on the map. Thanks.
- 9. Figure 1-1 Vision Map (page 5) has an 'X' Neighborhood Centers. These 'X' locations are not defined. These 'X' locations do not match current development of our neighborhoods. By 'Neighborhood Centers" do you mean Commercial Centers? If so, please rename them as Commercial Centers. If you really mean neighborhood centers, then please relocate the "X" to match our neighborhood designations and increase the number of "X" to match the total of our neighborhoods. If this is information developed pre-1995, please identify it as such.
- 10. Page 7 talks about streamlined permitting process = Planned Action Environmental Impact Statement. What happens if a PAEIS is modified after it is

adopted (say the college adds a major building to master plan after it was adopted ...has the community lost its option to comment/protest/support)? Does a PAEIS ever expire? Long plats expire. Please identify citizen input options gained/lost/timed differently with a PAEIS. And please add the answers to my questions to the Comp Plan.

- 11. Page 8 Buildable Lands Inventory should be included as a part of the Comprehensive Plan. And it should be available in the libraries and other places so the community can read it. I would like a copy made available to me, either to check out and read or to keep (if it is free or not too expensive).
- 12. Page 13 CP2: Consider the interests of the entire community and the goals and policies of this Plan before making planning decisions. Proponents of change in planning guidelines should demonstrate that the proposed change responds to the interests and changing needs of the entire City, balanced with the interests of the neighborhoods most directly impacted by the project.

What does CP2 mean? It refers to both policy and project changes. So far almost all changes adopted by City of Shoreline planning have weakened environmental protections and increased density and impacts. As a general attitude, our city has resisted impact fees where development pays its fair share of infrastructure and parks and schools costs. Our city has weakened environmental rules so that in order to avoid 'takings' issues, developers will be given exceptions to code to allow building on landslide hazard slopes and within wetland buffers. New denser development in mature residential neighborhoods triggers the need for new sewer and water pipes Which is paid for via LIDS by the long suffering residents. Bigger is not necessarily better. requires costly infrastructure upgrades that must be paid for by someone. The most honest way to identify support/opposition for changes in policy is to allow our citizens to vote on policy issues.

13. Page 16 talks about employment and employers in Shoreline. It does not mention FIRCREST and the 760

jobs at Fircrest that will vanish when Fircrest is vacated. City of Shoreline does not comment on Fircrest plans. It does not mention the jobs at Cingulair (145 & Aurora) that vanished when our City Council refused adequate access for re-development of that mini-mall. It doesn't mention the jobs that will be lost if Franks Lumber (178th & 15th NE) leaves Shoreline because of the land condemnation for both a sidewalk and a back alleyway access. Shoreline talks about being business friendly; Shoreline does not act business friendly to existing businesses.

- 14. Page 23 LU5 mentions REDUCED impact fees as incentives for growth. Shoreline has avoided imposing IMPACT FEES. If you do (and I support impact fees) impose impact fees, do NOT create a two tiered system of impact fee payments. Shoreline has met ALL growth targets and does not require reduced fees to encourage more growth. Reduced fees are fees that are subsidized by the general Shoreline taxpayers. We should not be subsidizing new growth. New growth should pay its fair share. Shoreline has a large percentage of untaxed land so the tax burden falls heavily on our non-exempt property owners already.
- 15. Page 24 LUa Develop neighborhood plans to carry out and refine the vision of the Comprehensive Plan at the neighborhood level.

LUa is a new goal/policy. In the past a neighborhood plan was optional. This makes a neighborhood plan mandatory. There are too damned many community meetings already. Let neighborhood plans remain OPTIONAL. If our development code isn't adequate to guide development, then add to the development code whatever is missing. Mandatory neighborhood plans mean that if we don't actively participate in neighborhood planning, then city development code can be weakened when we're not looking. And that is not right. Every time I pay attention, I find a new method for undercutting our city's development code and that is unreasonable, arbitrary, costly and enraging. Please leave neighborhood planning as optional.

16. Page 24 - ... permitted base density for this

designation will not exceed 6 dwelling units per acre unless a neighborhood plan, subarea plan or special district overlay plan/zone has been approved"...

Base density was not defined clearly in other parts of the Comp Plan. It appears that base density does not require that all new development be at a minimum of R-4 or R-6 which is how some other cities define base density. I am glad that we do not require a base density of R-4 or R-6 in new development because infill on small and irregular and sloped lots may often make it impossible to follow all the rules/codes and also meet a minimum (base?) density requirement. It would be unreasonable to force our city staff to frequently have to choose between following the code or building a required minimum number of dwelling units. Our staff must be allowed and encouraged to comply with our municipal code.

Also see Page 44 H5 for conflicting base density definition (see my 23).

17. Page 27 - LU 47

I believe the park at N 160th is really a park at 165th on the east side of Aurora SE corner east of the Interurban Trail. If there is a new park being added at 160th, please let us know where/why/how. Thank you.

18. Page 27 - LU50: Encourage the redevelopment of key, underused parcels through incentives and public/private partnerships.

Page 28 - LU60: Assist with land assembly and redesign rights-of-way to improve intersections for redevelopment.

Page 28- LU64: Direct special projects toward sites with the greatest development potential.

Page 28 - LU66: Pursue methods to consolidate developable lands in order to facilitate economic revitalization.

I hope LU50, LU60, LU64 and LU66 do not encourage City condemnation of private property for assembly and

re-sale to private or public/plivate gloups. The superior respect the current property owners and only use land condemnation when unavoidable to complete major public projects fully supported by our citizens. Urban Renewal in the 1960s was a failure. I lived in Chicago then and saw the blight it created. I would hate to have our city be responsible for similar fiascos. It would be a violation of public trust.

19. Page 29 - LU71: The Special Study Area designation applies to some areas of the community which might be appropriate for further study. These areas are designated for future subarea planning, watershed planning, special districts, neighborhood planning, or other study. It is anticipated that the underlying zoning for this designation shall remain.

LU71 includes every square foot of Shoreline, multiple times. What happens when special study area designations overlap and have different and conflicting results. What if the 'anticipated' underlying zoning designation changes instead of remaining the same? The propensity for planning chaos under LU71 is truly exciting. I prefer boring predictability.

20. Page 31 - T76: Support the creation of residential parking zones or other strategies to protect neighborhoods from spillover parking from major parking generators.

I strongly support creating a 'residential parking zone' option. We have many institutions that create parking hardships for residents and as we re-develop we will further aggravate those problems. Zone Permit Parking allows residents in neighborhoods with parking problems to be able to buy groceries or visit a doctor and return home and be able to park near home. Many houses lack double garages and double-wide 20 ft long driveways for owner parking. Institutions and re-development must not punish neighbors with their unwillingness to deal with the traffic their existence generates. We all must be good neighbors or we will hate one another. Shuttles, shared parking, increased bus service, safe sidewalks and crosswalks must all be part of the solution. But we cannot worry more about

how much parking will cost the user than how much failure to fix parking problems will hurt the taxpaying resident. Our first responsibility is to today's residents and businesses who pay taxes to keep our city healthy and vibrant. Our next responsibility is to planning for a healthy future for our current and future citizens.

21. Page 35 - EN1: Lead and support regulatory efforts, incentives, and projects to protect and improve the natural environment and preserve environmentally critical areas consistent with federal and state requirements. Where different state and federal requirements exist, the more stringent of the two shall be applied.

Page 36 - EN15 - exceptions to environmental rules

Page 37 - EN17 - risk analysis to breaking rules - cost to do it wrong vs cost to do it right

Gaston, Aegis and landslide hazard steep slope lot in Richmond Beach - You say one thing and you do otherwise. You break my heart when you violate our city code and allow exceptions that violate Federal, State, County and City law.

- 22. Page 35 EN3 and Page 36 ENb: I request that you add solar power and solar lights to new and remodeled city owned projects.
- 23. Page 44 H5: Require new residential development to meet a minimum density as allowed in each zone.

H5 is very different from my note 16 (page 24) information. H5 CONFLICTS WITH page 44 minimum density explanation. I oppose a required minimum density requirement for the reasons I listed in my note 16.

16. page 24 - Base density was not defined clearly in other parts of the Comp Plan. It appears that base density does not require that all new development be at a minimum of R-4 or R-6 which is how some other cities define base density. I am glad that we do not require a base density of R-4 or R-6 in new

development because infill on small and irregular and sloped lots may often make it impossible to follow all the rules/codes and also meet a minimum (base?) density requirement. It would be unreasonable to force our city staff to frequently have to choose between following the code or building a required minimum number of dwelling units. Our staff must be allowed and encouraged to comply with our municipal code.

- Page 44 H7 and H9 require evaluating costs of 24. the ordinary housing development process. this is the only place where cost analysis is required. I would love cost analysis to be required for all our urban renewal projects, including lost sales and lost tax dollars when we lose business because of redevelopment. Add in costs to ordinary citizens when we pay for a LID to replace water and sewer pipes because infill overloaded existing infrastructure and we can no longer fill our dishwashers or flush our toilets. If you are going to start looking at costs to developers, also look at costs to businesses, cost to residents, costs to all It is always good to have the facts. But I do not recommend that you add a 'delay subsidy' to developers who don't want to take the required time to process permits. The time line for permits is written into the code. Citizen involvement time is not 'unreasonable delay'; it is necessary process by people who also have skin in the game.
- 25. Page 45 H15: Explore the feasibility of creating a City housing trust fund for low income housing.

Many suburban cities already participate in a low income housing organization that is tied to a code requirement for developers to build low income multi-housing as a percentage of all new units. The screening and rent collecting is handled by an agency that already exists. The cottage housing guy told us about this program several years ago during an earlier Comp Plan hearing. We don't need to re-invent the wheel. We need to join an existing program and cut our overhead participation costs.

26. Page 49 - T3 "Adopt LOS E..."

The only intersection level of service lower than LOS E is LOS F. This goal says we opt out of improving our traffic quality of life. We opt out of traffic impact fees that new development could pay to help maintain and improve our gridlock. We opt out of the concurrency requirement for streets. We give up. We don't care. We quit.

Hell, no. Let's use the GMA concurrency requirement to improve our traffic mess. King County (our first code) used to require per dwelling unit impact fees used to improve intersections. We could institute the same policy. If we're going to have growth, let us get growth to help fix our problems instead of help make them worse.

27. Page 50 - T28. Provide pedestrian signalization at signalized intersections, and install midblock crossings if safety warrants can be met. Consider over-and under- crossings where feasible and convenient for users. Use audio and visual pedestrian aids where useful.

Highline High School (long gone) and Oak Lake Elementary School (Oak Tree Larrys Market mini-mall) have overcrossings. There is an overcrossing at 130th and Aurora. The old Chubby and Tubby on Aurora had an undercrossing that has been barricaded (too much drug and prostitution activity).

Except for where the Interurban Trail crosses Aurora, please try to install at-grade crossings so they can be used safely by all pedestrians. Physically disabled find above and below grade crossings difficult and dangerous.

175th between the west edge of Aurora and Stone Avenue has FOUR pedestrian crossing. Two are on Aurora. One is on the Interurban Trail. One is at Top Foods, across from City Hall.

15th NE has begged/petitioned/marched for a pedestrian operated red light crosswalk for children and seniors south of Ridgecrest Elementary School. City has said

the area does not qualify for warrants and has rejected a free pedestrian light grant. When rush hour traffic in the now 3-lane 15th NE flows, it is impossible to safely cross 15th via car or as a pedestrian. The new traffic 'fix' has made 15th NE less safe. At a recent Council of Neighborhoods meeting, a long time resident who crosses 15th loudly lamented the 'fix' that has made her east-west commute a miserable danger. To hell with the warrant 'requirements'. Senator Darlene Fairley at a candidates forum 1-1/2 years ago said that it is always possible to get a necessary pedestrian traffic light installed if people really need it. She referred to the Kirkland in-pavement flashers and red light crosswalk

28. Page 51 - Th: Streamline the Neighborhood Traffic Safety Program(NTSP) process and improve opportunities for public input.

Expect to put in hundreds of volunteer hours jumping through NTSP hoops and at the end of a two year period will probably still have many more hoops to jump through. It is possible to create a slower and more difficult method of improving neighborhood traffic safety, but I don't know how. At the end of the hoop jumping, the neighborhood and the City still have to agree on 'fix' proposals and then implement them. It is amazing to me that anyone ever gets to the end of this process and actually gets an improvement completed.

29. Page 51 - Tm: Work with developers/property owners along the Aurora Avenue North corridor and in North City to plan business access streets as a part of redevelopment.

To paraphrase Tm, strong-arm existing businesses to agree to donate/sell alleyway access to the City or convince businesses to leave. It is more important (to City Planners) to add alleyways to Aurora and 15th NE than it is to nurture and retain our existing commercial taxbase.

When the City decided to combine

negotiations/condemnations as a single step process in redeveloping the first mile of the Aurora corridor, the City clearly indicated that its stance was:
"you're either with me or you are against me ... and it's my way or the highway". That attitude is NOT 'working with' developers/property owners. It is coercion, blackmail, hostile. I don't want Franks Lumber to leave Shoreline. I don't want to lose the existing businesses along Aurora. If 'improving Shoreline' means running all of us who live or work here, then perhaps the 'improve Shoreline plan' needs to be changed.

- 30. Page 61 Capital Facilities
 Please add
- 6) If we cannot afford to pay for needed capital facilities, re-evaluate if 'needed' capital facilities can be shrunk or delayed or deleted = re-evaluate need/scale/timing
- 31. Page 63 CF6: To facilitate the maximum development potential of areas zoned for commercial and mixed uses, identify, construct, and maintain needed capital facilities.

CF6 can be paraphrased as 'put city tax dollars into new infrastructure along our major arterials first, before fixing old infrastructure problems in the single family residential neighborhoods. Tax the existing citizens but don't fix their problems. Put tax dollars first into redevelopment of our commercial and multi-family new construction areas. Support new construction infrastructure needs before existing infrastructure needs because it is a higher priority to encourage new construction than it is to meet our citizens' needs.

Indisagree with CF6. Our priority should be to first maintain what we have, and to protect and serve our existing taxpaying citizens and businesses. Second, we provide infrastructure for new development, and we insist that new development help pay for what it needs and gets via mitigation fees.

32. Page 64 - T32 and CF26
T32: Encourage and assist neighborhoods to form

Local Improvement Districts to finance local infrastructure development (e.g. sidewalks). CF26: Solicit and encourage citizen input in evaluating whether the City should seek to fund large community-wide capital facility improvements through voter-approved bonds.

Both T32 and CF26 ask for more tax dollars to pay for infrastructure replacement. LIDs are often formed here to fix infrastructure failures after growth has overwhelmed existing water line or sewer or surface water pipe capacity. The Shoreline Bond Committee rejected special tax bonds for all the City wish list items. After strong City arm twisting, the Bond Committee ok'd bringing back the Bond Committee in a year or two to re-evaluate public non-support for infrastructure bonds and new projects. The Bond Committee strongly recommended that the City live within its budget and spend current tax dollars on current infrastructure needs. Maintain what you have and live within your budget; don't get extravagant.

33. Page 70 - Goal ED III: Create and leverage opportunities for economic development.

I believe in market driven development. 1960's Urban Renewal was a disaster. USSR 5-year and 10-year planning was a disaster. I ran across projected growth figures for Puget Sound developed in the mid-1960s (from a Sunday Pictorial from the day the Seattle Center Puget Sound Basin water/land topographical map was installed in the Science Center. Greater Metropolitan Puget Sound has still not grown as big as those 1960's growth targets said it would We can be business GROWTH IS MARKET DRIVEN. friendly. We can be growth friendly. But we cannot assume that if we build it they will come. It doesn't work that way. Projections and estimates and growth modeling are simulations, not market reality. Somebody always pays for 'opportunities for economic development' whether it works or not, and the taxpayers are the providers of silver coin. Shoreline has a large percentage (it's in the Comp Plan somewhere) of tax exempt property. Shoreline Council and Shoreline Planners are eager to grant tax advantages to new commercial, retail and multi-family development. WE THE TAXPAYERS SUBSIDIZE THOSE WHO GET THE TAX BREAKS, and if the new development does not eventually pay its way as projected by the experts, it's our tough luck and our pocketbooks.

34. Page 71 - EDe: Encourage and support EXISTING retail activity within the City.

I have added the word 'EXISTING' to EDe because we seem to not value what we already have. Any grocery marketer knows that it is harder to gain a new customer than it is to retain an existing customer. It generates more profits and fewer costs to keep the market you have. The per customer costs to lure a new customer are much higher than costs to retain an existing customer. Our city has not treated existing businesses well. We need to cherish our existing businesses and help them grow.

35. Page 72 - ED19: Create partnerships with major landholders who are non-private or public entities to participate in the economic well-being of the community.

What does this mean? Does this mean create a special 'club' of agencies and people we like and treat them arbitrarily and give them special benefits (ENRON). Clarify what you intend to say and confirm that you really don't support arbitrary and capricious treatment by our city.

- 36. Page 73 ED33: Provide economic information such as market studies, vacant land inventories and sources of public assistance to existing and potential commercial development within the community.
- ED 33 sounds like the City wants to supplant real estate development companies like Trammell Crow, Sabey and Colliers. I believe we should let the commercial real estate market do what it does best. I believe market driven development works.
- 37. Pages 86 & 87 "The City is predominantly (correct spelling error here) covered with the Alderwood series of soils (U.S. Geological Survey Maps). Alderwood soils have drainage problems during

periods of heavy seasonal rainfall. Erosion can be severe and accelerated if vegetation (including trees) and forest litter, which protects the soils from rain, are removed for development."

"Residents characterize the City of Shoreline as a wooded community; this is often cited as a key reason for locating in the area."

Our City has two issues that should be confronted in the easy to re-develop lots in Shoreline. 1) Alderwood soils don't absorb water well (infiltration method of surface water retention/detention) when it rains and it always rains in the greater Seattle area. 2) Our cherished public image is closely tied to the existing mature evergreen trees in Shoreline.

Both Alderwood soils and big trees closely relate to existing and future problems with surface water flooding. We have old and inadequate surface water infrastructure. New construction surface water infrastructure requirements require planning (usually) for only 25-year storms. 25-year storms occur more frequently than every 25 years. Ask Public Works how often our newest 25-year storm systems have failed so far. Any 25-year storm system only provides a standard for how frequently it can be acceptable for the storm system to FAIL. Citizens pay the costs of failure, either in damage or in cost of upgrades of inadequate infrastructure, or both. I believe this is called 'risk management.'

Our infill re-development removes the margin of error that once vacant land (large lots & small houses) gracefully absorbed excess run-off rainwater. We need to increase our standards to 50-year storm systems if we intend to continue to infill with 80% and greater impermeable surface on R-12 and denser lots. Otherwise we create severe flooding nearby and downstream from new infill development.

38. Page 88 - "Currently in the Puget Sound, the bald eagle and Chinook salmon are listed as threatened species by the federal government under the Endangered Species Act. The Washington Department of Fish and Wildlife indicates bald eagle territory in the Richmond Beach and Point Wells areas. WDFW maps and

the City's stream inventory indicate the presence of Chinook salmon in McAleer Creek and in the lower reach of Boeing Creek. Other sources have indicated the presence of fish in other streams within the City although the full extent of fish habitat has not been confirmed. To help restore healthy salmon runs, local governments and the State government must work proactively to address salmon habitat protection and restoration."

Patty Crawford and City Councilmember Maggie Fimia presented documentation (including expert testimony-Fish & Wildlife I think) to the Shoreline City Council at a City Council meeting of a Chinook in Thornton Creek north of the Aegis/Twin Ponds site. Please specifically list Thornton Creek and Chinook salmon in the Comprehensive Plan.

39. Page 89 - "The City has reviewed the PHS management recommendations developed by WDFW for species identified in Shoreline and used them to guide the development of critical areas regulations that fit the existing conditions and limitations of our relatively urbanized environment."

The above sentences imply that the City of Shoreline code has adopted WDFW guidelines to protect critical areas. Instead the City of Shoreline has reviewed WDFW guidelines and then adopted code that violates the WDFW guidelines. For every agreement with WDFW guidelines, Shoreline has also written loopholes to violate the WDFW guidelines. I refer you to Aegis and Gaston and apartment development in the Ballinger area along a creek.

40. Page 116 Figure TR-4: This map shows peak period transit service coverage. The map shows NO peak transit service coverage on Aurora south of 175th? Please check if the map is in error. If the map is correct, we as a city need to lobby loudly to get peak transit service coverage on Aurora south of 175th. We pay the Metro tax dollars. We deserve benefits from our tax dollars. If I am misreading the map, please have staff make the map more readable in black and white.

- Page 118 Figure TR-5 Existing Sidewalks, shows a sidewalk on 165th west of Aurora to Shoreline Community College/Greenwood Avenue. THERE IS NO SIDEWALK ON 165TH WEST OF AURORA AND IT IS NOT ON THE 'TO BE CONSTRUCTED' LIST BECAUSE STAFF BELIEVES A SIDEWALK ALREADY EXISTS HERE (see Page 6-16 Table 6-5). Please add this high priority sidewalk to the TOP of the to-be-constructed-immediately list. and Aurora will receive a full red-yellow-green stoplight with Phase I of the Aurora Corridor which will attract increased auto and pedestrian traffic to 165th west of Aurora. We must protect the pedestrians, especially the youngest ones, from the youngest/newest drivers (high school and college student drivers).
- Page 120 Table TR-5 Intersection Accident Analysis (1998-2003) shows accident rates per million vehicles for accident prone streets in Shoreline. Please note that our so-called most deadly accident locations are They are on 5th NE and 175th, not on Aurora. and Richmond Beach Road, 15th NE and 175th and 15th NE I request that we re-evaluate the City and 155th. Council's strong opposition to more left turn lanes Further, I point out to along the Aurora Corridor. the City Council that the highest accident locations along the Aurora Corridor are at locations that have already been fixed (barrier to northbound left turn onto 170th from Aurora) or will be fixed when Phase I of the Aurora Corridor is completed (red-yellow-green light to be installed at 152nd & Aurora).
- 43. Page 129 LOS standards may be lowered. The suggestion to further lower LOS standards (from E to F?...F is poorest LOS) instead of fixing concurrency problems is to choose a lower quality of life for all Shoreline residents in order to avoid having developers and residents and shoppers pay to fix our problems. Redefining what is acceptable does not fix a problem. Redefining what is acceptable is the Federal Governments 'fix' for the Hanford radioactive cleanup problem. We must look 'behind the curtain,' be honest about what is behind the curtain, and then commit to fixing the problem.
- 44. Page 132 identifies current LOS for major

intersections. (Also see page 144, Figure TR-16) As I mentioned before, Shoreline has important gaps in information collecting. Shoreline Community College is our largest employer and generates enormous traffic. The two major routes now (and in the future when the 165th red-yellow-green light is added) into the college are 160th and 165th west of Aurora. Staff has not included information on intersection LOS for 160th and 165th. (Also see Page 145) This big omission must be corrected immediately. Shoreline Community College Master Plan Task Force consultants and NTSP (for 165th only) can provide some of the omitted data.

The Shoreline Community College Master Plan assumes a 20% increase in full time students (most SCC students are part time so double the number of projected cars with the 20% increase) when staff adds in the omitted data for 160th and 165th.

45. Page 134 lists two 'fixes' near Top Foods on 175th. Both 'fixes' violate the 'protect the neighborhoods from spillover/pass-through traffic' standard our city gives lip service to.

Page 134: To improve access to the neighborhoods and improve safety, the following improvements are recommended on N 175th Street between Aurora Avenue N and Meridian Avenue N:

- * Install a signal at N 175th Street and Ashworth Avenue N with left turn lanes on N 175th Street and provide sidewalks
- * Install a signal at N 175th Street and Stone Avenue N, extend Stone Avenue N from the north to N 175th Street, and convert the existing signal at N 175th Street and Midvale Avenue N to a pedestrian actuated signal as a part of the Interurban Trail crossing.

Sloppy traffic planning at the Top Foods site has created gridlock east-west

on 175th east of Aurora. This after-the-construction 'fix' penalizes the abutting neighborhood into receiving traffic that belongs on major arterials

but cannot get there easily. The City of Shoreline should be committed to

installing traffic calming devices and diverting

spillover traffic AWAY from 25-mph residential streets, not onto 25-mph residential streets. Shame on you.

46. Page 141 - "The traffic forecasts developed for 2022 with the Shoreline model assume that the households in the City will grow by 2,300 and employment will increase by about 2,200 workers within the City. It is projected that households will grow by 8.7 percent and employment will grow by 12.7 percent".

Does the projected employment increase of 2,200 workers include the loss of 760 Fircrest workers and the possible loss of the Franks Lumber employees?

47. Page 148 - 'The City should encourage the private businesses and developers along Aurora Avenue N to develop private access through alleys and rear access roads without placing curb cuts on the state facilities."

Threaten to condemn if private owners do not immediately comply with alleyway REQUIREMENTS along Aurora and 15th NE is not 'encourage'; it is coercion, blackmail. Our City needs to negotiate and mediate, not threaten and condemn.

48. Page 149 - Table TR-14 - Proposed General Description of Classified Streets

This table lists a range of speed limits for all categories of local streets and arterials. I request that Shoreline impose the lower limit for every class of street.

Principal Arterial - 30 not 35, 40, or 45 Minor Arterial - 30, not 35 or 40 Collector Arterial - 30 not 35 Neighborhood Collector - 25 not 30 Local Street - retain 25 (no change)

49. Page 151 - Table TR-15 Recommended Roadway Improvements (also see Ginger's item #4, above) Roundabout is listed as a staff recommended roadway improvement for Greenwood Avenue N/160th/Innis Arden Way (also see page 206).

Please view attachment from traffic subcommittee of Shoreline Community College Master Plan Task Force. SCC Open house responses did NOT show community support for a roundabout at this location. SCC received more than 100 written responses and open house was extremely well attended.

50. Page 156 - Table TR-16 First and Second Priority Pedestrian Projects

Please add sidewalk to this priority list for 165th west of Aurora to Greenwood (appears on page 208 on lowest level priority list).

(See Ginger's #6 and #41)

51. Page 162 - Business Access Road (alley) along Highway 99

Development of a business access road for businesses along Highway 99 would provide extra access for freight deliveries while moving trucks off of the heavily used Highway 99 corridor.

(See Ginger's #29 & 47) It is both disruptive and expensive to build business access roads or alleyways on developed properties. The only way it could be 'easily' done is to condemn and bulldoze the properties and add the alleyways to the redevelopment plans. This approach to city building is unreasonable. Our city has a goal of being business friendly. This 'solution' is existing business unfriendly.

- 52. Page 164 Table TR-18: 20-Year Transportation Revenue Forecast
 This table forecasts \$40,300 in Grants, total city revenue of \$47,120 (excluding grants) or assumes that almost half the money needed for transportation will arrive as grants. I would also like to forecast that I will win the Lotto bigtime. Both are unrealistic expectations.
- 53. Page 721 change Richmond Reserve to Richmond Beach Reserve
- 54. Pages 192 and 193 examine capital funding options. I understand the new city hall (projected cost \$20 million page 202) will be financed from the general

fund via Councilmanic bonds. The Council has clearly indicated that it does not intend to allow a public vote for/against a new city hall. Shoreline surveys and the bond committee clearly indicate scant voter support for a new city hall. Councilmanic bonds will also avoid public vote. Build/lease/purchase would also avoids public vote. New city hall planning requirements have been downsized twice because the first two proposals exceeded Shoreline's bonding capacity. I oppose building a new city hall now. I believe our tax dollars and bond capacity needs to be used/saved for basic infrastructure repairs and maintenance. First we fund the basics. Last, we fund the luxuries.

- 55. Page 198 Road Impact Fees
 The old King County code (our first municipal code in 1995) authorized per dwelling unit road impact fees.
 Shoreline City Council has rejected impact fees every time the issue has been raised. I support impact fees to help pay for infrastructure improvements. Growth strains old infrastructure. Growth should help pay to fix problems aggravated by growth; otherwise existing citizens subsidize new construction and that is unreasonable.
- 56. Pages 221 and 222 summarize city tax income. Shoreline receives a large percentage of gambling tax money. Please indicate where/amount the gambling tax money fits in table ED-9. Please show what percentage of total Tax Base gambling revenues are.
- 57. Pages 226 and 227 list vacancy statistics and housing sales prices. Shoreline has many low income subsidized apartment units. Please separate market rate and subsidized units.
- 58. Page 232 & 235 Add 'base density' and 'minimum density' to definitions if you intend to use either term. (Also see Ginger's #16 & #23 comments) Base Density is mentioned in Density Incentives/Bonuses but this definition reflects only one of two possible definitions for base density.
- 59. Page 235 Critical Areas Please add ponds and lakes and rivers to definition of critical areas.

60. Page 239. A Long Subdivision or Long Plat is also sometimes called a 'Formal Subdivision' If the term 'Formal Subdivision' will be used, please add it to the definitions.

Thank you for considering my comments. I fully participated in the first Comprehensive Plan and have followed all changes to the Comprehensive Plan closely. I am familiar with our Shoreline Municipal Code and its many changes since 1995. I ask that you be very careful with all Comprehensive Plan changes that weaken our goals and policies.

Thank you for listening.

Sincerely,

Ginger Botham

Attachment - SCC Open House Traffic Revision info

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Ginger & Ric Botham foxdusty@yahoo.com 542-7793

From Ginger Botham
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Shoreline, WA 98133-5620
206-542-7793
foxdusty@yahoo.com

Comments - 2004 Draft Comprehensive Plan Email to: masterplan@ci.shoreline.wa.us

These comments are in addition to comments submitted earlier. I will continue sequential numbering of

comments for the two letters.

Document: City of Shoreline Surface Water Master Plan Draft April 2004 Prepared by R.W. Beck Inc with support from Adolfson Associates, Inc

Page vi first paragraph clearly states " In 61. addition, the City must ensure that new development is implemented in a way that meets regulatory requirements, enhances the City's system, and does not exacerbate existing problems." (Also see Table 4-1 In the past, our City has page 26, same issue) required a minimum of new development, that it does not worsen existing (serious) problems and that it meets minimal storm frequency retention requirements. In very rare cases, and only when impervious surfaces will exceed approximately 78%, has our City required retention beyond projected 25-year storm requirements. The result has been worsened flooding whenever we have storms during the wet season in most areas with new infill development. Quality of life has deteriorated. Look at the records for the storm of December 1997-January 1998. New infill construction during that period was built to our new code (early-1980 King County Surface Water Manual modeled on Santa Barbara, CA rainfall patterns) and new surface water retention-detention systems failed. Our City adopted the 1998 King County Surface Water Manual (modeled on King County, WA actual measured rainfall) a year or two later because our minimum standard was clearly inadequate.

At least two Shoreline Citizen Surveys clearly indicated water issues, road repair and parks as top spending priorities by our voters, with water issues at the very top. We must insist that any new construction does not aggravate existing flooding problems, and we should require that it improves it. Only by requiring improvement will we plan adequately for 25-year storms, 50-year storms and 100-year storms ... which seem to occur at least twice as frequently as their names describe.

62. Page 20, Table 3-1 Surface Water Program Requirements is an excellent tool to help us all

understand requirements and identify our City's failure to meet requirements. Columns headed "Endangered Species Act 4(d) Rule" and "Plan of Action" clearly provide legal authority to Shoreline to require new development to meet higher standards of water protection. The "Plan of Action" column begins with a statement that the King County Surface Water Manual 1998 does not satisfy Ecology's minimum requirements. The addition of Volume IV, Source Control BMP's of Ecology's 2001 Stormwater Management Manual for Western Washington, to be replaced with the 2002 Urban Land Use BMP's Volume IV, is a welcome and needed addition to protections. Now we need enforcement.

The third starred item in the "Endangered Species Act 4(d) Rule" column states that design standards should prohibit "Removal of water or otherwise altering streamflow in a manner that significantly impairs spawning, migration, feeding, or other essential behavioral patterns"

Aegis development violates this standard. Aegis built in the buffer and the water level of Peverly Pond has dropped. When the Chinook viewed upstream at the Crawford's lot is also considered, the level of violation is substantial. We must improve our code, and we must follow our code. Table 3-1 is a good starting point. The 'takings' liability issue supports enforcement of stronger standards. The last two paragraphs in the "Plan of Action" column says that protecting endangered species provides legal liability protection to the City.

"The City will reduce its liability under Section 9 of the Endangered Species Act (ESA) by reducing impacts to water quality, preventing further degradation to habitat, and increasing overall regulatory compliance. The projects and programs developed under this Surface Water Master Plan will accomplish these goals.

The City may also rely on local projects that have federal permitting or funding to obtain an incidental take statement (ITS) from the Section 7 ESA consultation process with other federal agencies. Entities complying with the terms and conditions of an ITS are protected from ESA 'take' liability."It makes legal sense to increase our 'water' protections.

- Page 23 of Table 3-1 Surface Water Program 63 Requirements talks about maintenance and operations of both public and private facilities. (Also see 8.2 page 86) When I read this table, I visualize existing problems in our City. The so-called privately owned surface water detention/retention system between Shorewood Hills I & II has just been replaced at great cost to Shorewood Hills I & II residents. I have been told that Shorewood Hills asked the City to guide this replacement project so as to be sure to 'do it right' the first time. I have been told that the City instead chose to act 'hands off' and do a post-proposal critique instead of partner via advice and direction from the beginning. This 'hands off' approach may be a policy issue, but a more coordinated venture would have been more expedient. Surface water requirements are a fast changing target and our City needs to provide friendly guidance. Goal was to hand the up-to-code system ownership to the I have also been told that Shorewood Hills I &II has given the City attorney a copy of the King County paperwork that assumed responsibility for the retention/detention system from Shorewood Hills I & II so this system is really a City of Shoreline responsibility that transferred from King County to Shoreline when we incorporated. Please investigate and determine where ownership responsibility rests. Page 86 justifies the City assuming ownership of this system.
- 64. Page 29-30 Please add a bullet as follows:

 * Retention ponds and underground storage infiltration slow release
- 65. Page 49-50. Chapter 5.3 Proposed Flood Protection Projects and Programs
 This section is written for large project, not minor occasional minor flooding inconvenience projects.
- "It is recommended that all projects be designed to provide 100-year storm event level of protection. However, it is recognized that in some locations it may be cost-prohibitive or physically impossible to provide this degree of protection. The City will determine the level of protection to be provided on a

case-by-case basis for each project."

T believe that the adopted 1998 King County Surface Water Manual (modeled on King County, WA actual measured rainfall) requires 100-year storm event protection for big projects and that 100-year protection is not optional. Please remove the underlined sentences in the above paragraph so that Shoreline will conform to legal requirements.

66. Page 66 first paragraph lists methods for reducing impervious surface area.

"In addition, a variety of urban planning and design techniques are currently being explored that reduce the area of impervious surfaces in new developments, such as reduced street widths, landscaped cul-de-sacs, and placement of sidewalks on only one side of the street. Whenever feasible, these and other advances should be evaluated and included in development proposals that come before the City."

Instead of arbitrary/unpredictable compliance with code (variances), either keep the code as is or change it. Also, I have underlined reduced street widths; Shoreline has already reduced street widths. The result is more dwelling units can be squeezed onto small infill lots. The net result is NOT less impermeable surface; the result is greater density. Please do not reduce street width again. Many of the private roads need 'no parking' signs so that fire trucks can use these narrow private roads. The 'no parking' signs on private property are mostly unenforceable. This 'reduced street width' solution is worse than the problem it 'solves'. Road width (and parking) is a health and safety issue.

67. Chapter 9 Financial Analysis page 97 graph has three components. For clarity, please add a color or texture to the O&M Component. Otherwise the O&M looks like background instead of like a component.

Page 93 says "For a system with 24,000 ESUs based on SWM fee revenues, an annual expenditure of \$24,000 requires a SWM fee of \$1 per ESU per year. " Is the \$1 the billing cost? This paragraph needs more detail, please, to make sure non-experts understand

what is being said.

68. Page 1 of Appendix A refers to Peverton Rond (Under Thornton Creek). I believe this is "Peverly" Pond.

General Comments - All Volumes of 2004 Shoreline Comprehensive Plan

- 69. I strongly protest the lack of legislative format markup used in this Comprehensive Plan. The only way a reader can identify changes is to have the old Comp Plan and the new Comp Plan laid out side by side, and to read both simultaneously. In the past, legislative format (shows strike out old text next to added new text) was used so that readers could identify changes and comment on old and new. This format is user unfriendly.
- 70. I requested a .doc or .rtf electronic comment form so that I could type my comments in the City's requested format. The .pdf format would have required me to hand write/print all my comments, then photocopy the results so that I could keep a copy. My lousy handwriting and arthritis would have made hand written comments reader unfriendly. I cross referenced my comments by text page number because I did not use the summary matrix document. I prefer the full text documents.
- 71. I prefer to spend our tax dollars first on infrastructure maintenance and improvements, and on parks. I believe new infill should pay mitigation fees to help pay for infrastructure improvements necessitated by the infill. I believe LFDs and bonds should be used for luxuries, not for basic infrastructure maintenance and replacement needs triggered by infill. If we cannot afford basic infrastructure maintenance and replacement needs with our current tax dollars, then we need to re-evaluate our spending first. And we should re-evaluate our growth targets. New bonds and taxes and LIDs should be a last resort and bonds and taxes should require a citizen vote.

Any additional comments will begin numbering after 71.
Thank you for considering my comments.
Sincerely,

Ginger Botham

Ginger & Ric Botham foxdusty@yahoo.com 542-7793



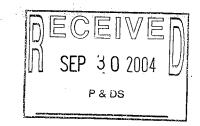
State of Washington

DEPARTMENT OF FISH AND WILDLIFE

Region 4 Office: 16018 Mill Creek Boulevard - Mill Creek, Washington 98012 - (425) 775-1311

February 5, 2004

Patty Crawford 2326 N. 155th St. Shoreline, WA 98133



Dear Ms. Crawford:

SUBJECT:

Request for Confirmation; Probable Wild Steelhead Sighting, Thornton Creek, Tributary to Lake Washington, Section 17, Township 26 North, Range 04 East, King County, WRIA 08.0030

The purpose of this letter is to confirm the probable wild steelhead sighting in a small pool within Thornton Creek on the property of Tim and Patty Crawford at 2326 N. 155th St., Shoreline WA 98133. On February 4, 2004. Individuals also present at the time of the observation included Patty Crawford, Bob Vreeland, Janet Way, and Andy Loch, water quality specialist with the City of Shoreline. The fish was approximately 18 inches long, had an attached adipose fin, and the general condition of the fish appeared to be good. There was, however, visual evidence of wear on the margins of the tail which is typical of the type of injury suffered by returning adults as they make their way upstream to spawn. This suggests to me that the steelhead had reached this location under its own power and was not placed at this location. Determination of the steelhead's exact age or period of time spent in fresh vs. salt water would have required sampling which we were not prepared to undertake on February 4th.

Thank you for the opportunity to provide this information. If you have any questions, please contact me at (425)379-2305

Sincerely,

Eric D. Pentico

Eric D. Pentico Area Habitat Biologist

EDP:edp

My Folders [Hide]

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I-80 Adv. Comm. JW campaign

Nieghborhood Su...

Northgate

PPNG

Trash

Fircrest

Shoreline

TC Wat Mgmt Com

maintenance

seiko sato add



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Bad Credit? Good MasterCard!

Hi Janet:

To:

CC:

I appreciate your continuing concern regarding the documentation of salmonids in Thornton Creek. As you know, The City of Shoreline's rece completed Thornton Creek Basin Characterization Report contains extensive references to fish utilization of Thornton Creek, including reference to the observation of on steelhead in Reach TC7 on February just north of North 155th Street.

"Janet Way" <janetway@yahoo.com>, "Kathy Minsch" <Kathy.Minsch@Seattle.Gov>, caka

jlombard2415@earthlink.net, dgar461@ecy.wa.gov, Richtins@hotmail.com, kathleenkcarr "Cheryl Eastberg" <cheryl.eastberg@Seattle.Gov>, "Ed Pottharst" <Ed.Pottharst@Seattle.(

BJCummings@aol.com, estell@berteig.net, brian@biospherecompany.com, "Kris Overlees

donncharnley@comcast.net, k.mcarthur@mcs-environmental.com, david.stjohn@metrokc

Spencer" <Bob.Spencer@Seattle.Gov>, "Carlton Stinson" <Carlton.Stinson@Seattle.Gov>,

Minsch" <Kathy.Minsch@Seattle.Gov>, "Keith Kurko" <Keith.Kurko@Seattle.Gov>, "Marga Mercer" < Mike.Mercer@Seattle.Gov >, "Miranda Maupin" < Miranda.Maupin@Seattle.Gov >,

<Neil.Thibert@Seattle.Gov>, "Sylvia Cavazos" <Sylvia.Cavazos@Seattle.Gov>, "Terry Kak

Timothy.Croll@Seattle.Gov>, "Vic Roberson" < Vic.Roberson@Seattle.Gov>, CKLINKER@se adskipknox@yahoo.com, "Andrea Spencer" <aspencer@ci.shoreline.wa.us>, "Lanie Curry

On May 6, 2004 you requested that the Planning Commission acknowledge the presence of salmonids in Thornton Creek, including the steelhead (see Planning Commission Staff Report, Sept 28-30, Attachment D, Line 72, page 20). The staff's response to your comment is that "The WDFW's Area Habitat Biologist did identify an adult steelhead...and...the final version of the Storm Water Master Plan will incorporate this and other recent information about fish". The Planning Commission stormwat subcommittee has reviewed your comment, and the staff's response, and

rcrozier@ci.shoreline.wa.us>

concurs that this information should be included in the final report.

We have also addressed your concerns about the usage of the term "artificial" in the draft reports. Both staff and the Planning Commiss subcommittee recommend removal of this term from the final reports, as have suggested. (Line item #71).

Staff and the Planning Commission subcommittee have also considered ar responded to your other comments and suggestions, including SEA Street (Line Item #295), green building practices (#296), use of toxics (#297), habitat designation (#298) and adoption of the State Stormwate Manual (#300).

The Public Hearings scheduled for this week will allow you and other members of the public to further comment upon these and the other 354 comments on the draft plans. Following the Public Hearings, the Commis will vote on its final recommendation to City Council on each of these items. We expect the City Council will review the Planning Commission's recommendation in November at its own Public Hearings before their final vote.

Thank you for your containing interest in our updates and I look forward to seeing you tomorrow evening.

Tim Stewart Director of Planning and Development Services City of Shoreline.

----Original Message----

From: Janet Way [mailto:janetway@yahoo.com] Sent: Sunday, September 26, 2004 3:14 PM

To: Kathy Minsch; Tim Stewart; cakaea@comcast.net; Erik@dcgengr.com; jlombard2415@earthlink.net; dgar461@ecy.wa.gov; Richtins@hotmail.com; kathleenkcarr@msn.com; ktaylor@PSAT.WA.gov; SLondon@sccd.ctc.edu; Cheryl

Eastberg; Ed Pottharst; Miles Mayhew; Janetway@yahoo.com Cc: BJCummings@aol.com; estell@berteig.net; brian@biospherecompany.com Kris Overleese; donncharnley@comcast.net;

k.mcarthur@mcs-environmental.com; david.stjohn@metrokc.gov; Longears@msn.com; mbrokaw@SCCD.ctc.edu; Bob Spencer; Carlton Stinson; Chris Woelfel; Kathy Minsch; Keith Kurko; Margaret Glowacki; Mike Mercer; Miranda Maupin; Nancy Ahern; Neil Thibert; Sylvia Cavazos; Terry

Kakida; Timothy Croll; Vic Roberson; CKLINKER@seattleschools.org; smith@smithhustoninc.com; adskipknox@yahoo.com Subject: Re: Shoreline Comprehensive Plan public notice

Dear Kathy and Members of this Committee,

Thanks for this ALERT!
I hope some members will take the time to attend these Shoreline Hearings, but more important that you'll delve into the Comp plan and Master Plans.
I realize that it's not an easy task, but I'm alarmed (big surprise) at a number of things in these plans that should concern us "Watershed Stewards"._____

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#1 - I've been reviewing the SEPA Checklist for the Plans and find that the City is still in heavy denial that Thornton Creek is a "salmonid" stream or at best is confused.

Several places they mention Boeing and MacAleer as having threatened species and or being "salmonid streams" , but NOT THORNTON CREEK!! I personally saw a huge Steelhead north of NE 155th last Feb, and it was confirmed by 5 fish biologists and several other witnesses including a city councilmember

There are many other areas of concern as well, including their description of the creeks which states that "Thornton Creek originates at Ronald Bog", when all of us know it "originates" much further north at Cromwell Park and in numerous locations such as Littles Creek, Hamlin Creek and N Seattle Community College Wetland, etc.

So this is just the tip of the iceberg, but we all must agree that the basic information contained in the Comp and Master Plans MUST be accurate at minimum for City's make good policy's to protect our environment...in fact it's expected by law.

Really hope you'll try to check this info out with me. I'd think that SPU would want to make an official comment to Shoreline about this! Here's the web link for Shoreline's Planning Dept and Comp Plans. http://www.cityofshoreline.com/uploads/attachments/092804%20Surface%20

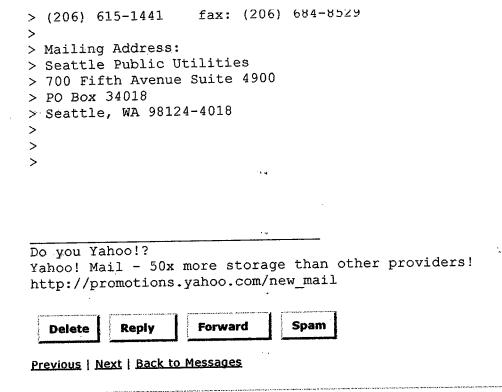
I can only attend on Tues since I work on Wed and Thurs. Sorry I missed our last mtg. Thanks for your help.

Janet

--- Kathy Minsch <Kathy.Minsch@Seattle.Gov> wrote:

- > FYI SEPA notice
- > LEAD AGENT: City of Shoreline
- > PROPOSED ACTION: Adoption of updates to the City of
- > Shoreline
- > Comprehensive Plan, including Land Use, Housing,
- > Transportation, and
- > Capital Facilities, Utilities, Parks, Recreations
- > and Cultural
- > Services, Shoreline Master Program, Economic
- > Development and Community
- > Design.
- > LOCATION: All of City of Shoreline
- > DEADLINE FOR COMMENTS: September 27, 2004, 5pm
- > CONTACT: Andrea L. Spencer, Planning and
- > Development Services, City of
- > Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133,
- > (206) 546-1418.

> FURTHER INFORMATION: Public Meetings are at 7pm at:
> St Dunstan's of the Highlands, 722 N 145th St,
> Shoreline, Sept 28
> Bethel Lutheran Church, 17418-8th Ave NE, Shoreline,
> Sept 29
> Board Room, Shoreline conference Center, 18560-1st
> Ave NE, Sept 30
>
> Thanks.
> Kathy Minsch
> Watershed Stewardship Team Lead
> Community Services Division
> Seattle Public Utilities



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WHY A RESTORATION STRATEGY FOR OUR WATERS?

Seattle is a City defined by water. Puget Sound, Lake Washington, Lake Union and the Ship Canal, the Duwamish River, urban creeks and small lakes each enhance the quality of life for the people, fish, birds and other wildlife that live here. The City is currently host to 4 species of salmon including Chinook salmon, listed as threatened under the Endangered Species Act (ESA). It also hosts resident trout, blue herons, bald eagles and a web of more resilient water dependent species. Seattle's major waterways bustle with water-oriented business and recreational opportunities and support one of the premier industrial seaports on the West Coast. Seattle's aquatic areas also offer important opportunities for residents to enjoy and experience nature close to home.

Over 150 years of urbanization has steadily degraded Seattle's aquatic resources. Six miles of the Duwamish River is a Federal Superfund site. Over 90% of Seattle's 146 miles of shoreline have been modified and lack natural connections to the water. Seattle's urban creeks have seen stormwater flows equivalent to some rivers. Fish in our local waters contain high amounts of mercury and PCB's and some of our coho salmon are dying before they can spawn in Seattle streams. Yet, while they are considered degraded, these aquatic environments have amazing vitality and resilience.

To stem this degradation, over the past 30 years the City of Seattle has made significant investments in protecting and restoring creeks, shorelines and waters within the City, and as appropriate, has also required developers to do the same. However, the city's dense urban nature makes these efforts both challenging and expensive. Seattle is a major urban center, and consistent with the Growth Management Act the City will have more growth and more density than surrounding areas. Consequently, the City must balance the

coordination to actions by government and the community to **Restore Our** Waters.

DEVELOPMENT OF THE RESTORE OUR WATERS

STRATEGY

In April of 2004 the Mayor issued Executive Order 03-04 requiring interdepartmental review of everything the City does that affects water resources inside the City limits. Twelve City Departments were instructed to develop a shared action plan that would:

- * Focus the City's efforts towards achieving what is best for water quality and aquatic habitats inside the City;
- * Establish City-wide priorities and a shared framework for investments and best management practices (BMP);
- * Develop a long-term framework for departments to work together on matters affecting our waterbodies;
- * Streamline and coordinate city policies, regulations, and enforcement;
- * Create educational opportunities which inspire others to take protective and restorative actions on behalf of our waterbodies;
- * Provide incentives for others to steward, protect and restore these resources;
- * Identify methods to leverage City funding of these efforts; and
- * Create a mechanism for stakeholder involvement.

The findings from the cross-departmental effort form the foundation of the *Restore Our Waters Action Agenda*, which follows. The 9 Actions recommended in this strategy are summarized below.

ACTION ITEM #1. Establish Long-Term Aspirations for In-City Water Resources.

ACTION ITEM #2. Use Science-Based Guidelines to Direct Citywide

REVISED REVISED PUBLIC COMMENT 124

environmental benefit of concentrating residential, commercial and industrial development in an already dense urban area and the benefit of restoring these critical resources within our City. More challenging is the difficulty and expense of tackling all the indirect impacts that cumulatively have led to the water pollution, uncontrolled flows, and extensive shoreline and channel modifications that define the current state of Seattle's waterbodies.

The City needs a coordinated, wide-ranging and science based strategy focused on all of Seattle's aquatic environments. City departments need guidance about where to focus protection and restoration efforts, based upon good science and informed by regulatory requirements, funding availability, community interests and opportunity. The City needs to make decisions that result in the best long-term improvements in the overall health of the aquatic ecosystem and the best return on investment of City funds. City actions must also seek to achieve multiple benefits (e.g. environmental, recreational, economic development), and be consistent with tribal treaty obligations.

The City as a government cannot solve all, or even the majority, of problems confronting creeks, shorelines and waters in Seattle. In fact, the City's ability to protect and restore aquatic resources is narrowly limited to the small percentage of properties it owns and the development activities it regulates. Therefore, it must actively engage private property owners, non-profit organizations, community groups and other government agencies in this effort.

The Mayor is committed to fostering healthier aquatic ecosystems in Seattle by defining long-term aspirations for each unique aquatic area, establishing science-based investment guidelines, and focusing City resources to support three fundamental principles:

- * Do no further harm
- * Restore critical natural functions and highly functional areas; and
- * Inspire others to do the same

Hence the Mayor has set forward this strategy to give more focus and

Efforts.

ACTION ITEM #3. Establish Clear, Quantifiable Goals and Measures of Progress.

ACTION ITEM #4. Make Strategic Changes to the City's Policy and Regulatory Framework.

ACTION ITEM #5. Move Forward on Priority City Capital Project Investments.

ACTION ITEM #6. Make Investments to Ensure City Operations Support Improved Aquatic Health.

ACTION ITEM #7. Expand Partnerships with the Community and Private Property Owners to Restore Our Waters.

ACTION ITEM #8. Advance Scientific Understanding and Adaptively Manage City Efforts.

ACTION ITEM #9. Establish a Stakeholder Group to Promote Long-Term Coordination within City Government and Between the Citizens of Seattle.

Appendix 1 provides an Action Plan with timeframes, funding and responsible departments

ACTION AGENDA TO RESTORE OUR WATERS

ACTION ITEM #1. Establish Long-term Aspirations for In-City Water Resources.

The key to understanding how and where to invest in Seattle's aquatic resources is clearly articulated aspirations for each waterbody and the investment priorities that follow. Seattle's aquatic environments range from freshwater lakes and creeks to marine shorelines and bays. All are unique in location, attributes, circumstances and the issues that affect them. Not all will require the same level of investment or effort, nor is it desirable or cost effective to improve all of them (from an ecological perspective) to the same degree. Overall, the Mayor's aspirations for aquatic environments in the City are that they be:

Sustainable places that citizens and businesses can utilize, access and have pride in and in which fish and other wildlife can flourish.

Following are the Mayor's specific aspirations for ten unique aquatic resource areas in Seattle. These aspirations articulate how the Mayor envisions the future condition of that resource. Some goals may not be reachable in our lifetimes, but we can still aspire to reach them.

Duwamish River – The Duwamish has been transformed from a Superfund site and industrial waterway to a vibrant and thriving ecosystem that coexists with resident industries. City and private sector sediment remediation and habitat restoration projects have reclaimed significant areas of inter-tidal and shoreline habitat, allowing wildlife to flourish along stretches of the river and providing areas of valuable public access. These areas are successfully intertwined with the City's maritime and industrial firms, and enhance their properties. Businesses and residents view the Duwamish as a vibrant and complex ecosystem, and guard against renewed contamination and water pollution.

Puget Sound Shoreline - The City, working with shoreline businesses and

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Matthews Beach addressed. Coho pre-spawn mortality is reduced. Fish passage barriers have been sequentially removed and local residents, in collaboration with the City, have made improvements in habitat conditions in areas where flows and channel conditions can adequately support aquatic life.

Taylor Creek — Citizens value this creek as the City's most pristine in-city watershed. Fish passage barriers in the lower reaches of the creek have been sequentially removed and conditions at the mouth improved to make the creek a healthy home and refuge area for migrating juvenile salmon. Surrounding development in the upstream unincorporated area has been designed to limit stormwater flows and protect water quality in the creek. Overall water quality is improved.

Pipers Creek – The community regards this creek as a vital centerpiece of Carkeek Park and the Greenwood and Broadview communities. City investments in natural drainage systems and other techniques have reduced high impact creek flows. Water quality is improved. Salmon have access to the lower reaches of the creek. Coho pre-spawn mortality is reduced. Reforestation efforts sustain the integrity of this ecosystem.

Longfellow Creek – The Delridge community enjoys this creek and it is viewed as a legacy and an asset. Salmon populations are thriving and have access to key habitats within and above the golf course. Flows are controlled to support a diversity of species. Impacts from CSO's, septic tanks and stormwater runoff are minimized and water quality is improved. Coho prespawn mortality is reduced.

Fauntleroy Creek/Smaller Creek Systems – These smaller creeks are highly functional wildlife corridors. Residential property owners and the community have been assisted by the City in their efforts to slow flows, limit water quality pollution, reforest creek buffers and, where valuable, reconnect creek mouths to shoreline areas.

Green, Bitter and Haller Lakes - Green Lake continues to be one of the

residents, successfully has restored shallow water habitat and shoreline refuge areas for resident and migrating fish and birds. Water from City's outfalls meets or exceeds State and Federal water quality standards. Bluff erosion provides a natural source of sand and gravel needed to maintain beach habitat.

Chittenden Locks/Ship Canal/Lake Union/Portage Bay — This area of the City remains a vital center for Seattle's water dependent maritime industrial base, and still serves as the home base of the North Pacific Fishing fleet. While still used intensively for industry, this resource area has greatly improved water quality. The City in collaboration with local industries has restored significant areas of shallow water and shoreline habitat for migrating fish and birds, while balancing the needs of industrial businesses in the area. An area habitat plan allows development-required mitigation efforts to effectively contribute to these shore-edge refuge areas and public access points within this major transportation and marine industrial corridor. Sediment contamination and Combined Sewer Overflow (CSO) related water pollution has been adequately addressed, and water quality is sufficient to encourage public recreational uses. A more gradual saltwater/fresh water transition at the western end of the corridor, and cooler summer water temperatures make the waters more hospitable to aquatic life.

Lake Washington/Union Bay – Lake Washington remains a regional recreational resource, and the City, in collaboration with private property owners, has made significant and effective investments to improve shoreline edge habitat. Water quality is improved and pollution from marinas, contaminated sites, storm drains and CSOs is significantly reduced. Shorelines and shallow water habitats are strategically restored and re-vegetated. Docks are retrofitted to decrease interference with key refuge and rearing habitat for migrating salmon.

Thornton Creek – Creekside landowners have worked in concert with the City to make the largest and least publicly owned creek its most productive. Habitat damaging flows of stormwater entering the creek have been controlled. Overall water quality has been improved and specific conditions at

City's premier recreation areas and is consistently fishable and healthy for swimmers and wildlife. Water quality in all in-land lakes has been improved and native vegetation at the lakes' edges are adequate to support a healthy and diverse population of bird and aquatic species.

ACTION ITEM #2. Use Science-Based Guidelines to Direct Citywide Efforts.

To achieve the foregoing aspirations, the City must take a long-term view of how to best restore the health of each area. A centerpiece of this strategy is a set of science-based guidelines for prioritization, sequencing, and coordination of all City of Seattle efforts. (Table 1 below). These guidelines reflect the condition and weigh the importance of critical limiting factors in creek, lake and shoreline areas. Detailed information about current conditions was compiled by City staff and is provided in Appendix 2 - Summary of Current Conditions and Critical Limiting factors. These guidelines are intended to ensure greater scientific rigor and uniformity in department decision making related to aquatic environments.

Table 1

Science Based Investment Guidelines

Puget Sound/Duwamish/Lake Washington/Lake Union/Ship Canal
Shorelines

Highest Priority Re-establish critical habitats. Create a physical chain of naturalized (restored & revegetated) refuge areas giving highest priority to: a) large contiguous areas; b) areas adjacent to available habitat; and c) critical gaps.

* Control water quality and remove contaminated sediments in regulated areas and proximate to habitat refuge areas and public contact recreation points.

Medium Priority *

Remediate contaminated sediments in non-refuge and non-public contact recreation sites.

Lower Priority * Revegetate 'non-refuge' shoreline areas with native plants.

Creeks

<u>Highest Priority</u> *Reduce high impact creek flows.* Give highest priority to reducing runoff in areas that: a) deliver the largest volumes of stormwater runoff to creeks; b) discharge runoff the fastest; and c) impact the longest downstream portions of the creek.

* Facilitate improvements in existing channel capacity/hydrologic conditions giving highest priority to: a) large areas with fast water; b) areas with available floodplain; and c) creek sections that represent critical gaps in low flow velocity refuges.

* Address water quality issues for humans and aquatic health.

Medium Priority * Facilitate sequential removal of fish passage barriers (and grade controls).

Lower Priority * Establish complex in-stream and riparian habitat structure.

In-land Lakes

<u>Highest Priority</u> Address water quality issues that could impact human health.

Medium Priority* Address other water quality issues.

Lower Priority * Revegetate shorelines and enhance habitat diversity.

*Designating an activity as "medium" or "lower" priority does not imply that it is unimportant, it means only that these are areas where the <u>City's</u> investments (vs. property owner investments) should be limited to smaller, more community based and opportunistic increments <u>until</u> higher priority issues for a specific area are addressed.

These are guidelines that will establish the scientific value of a City action or investment in water resource protection and restoration. The City may then choose to weight (or balance) a particular effort with other considerations such as: opportunity, cost-benefit, lifecycle cost, community interest, practicality, legal requirements, potential adverse impacts on industrial businesses, and other City policy objectives.

ACTION ITEM #3. Establish Clear, Quantifiable Goals and Measures of Progress.

While the Mayor's fundamental principles, the resource area aspirations, and the science-based investment guidelines above provide an overarching focus for City efforts, establishing quantifiable goals and measures of progress (perhaps akin to Seattle's goal of recycling 60% by 2010) will provide something more tangible to achieve. As part of the Restore our Waters strategy, the City will work with scientists and economists over the next several years to develop reasonable and quantifiable goals for Seattle's water resources overall and (if desirable) for specific resource areas.

In addition to this, the City will continue to work to better monitor baseline conditions and trends (upwards and downwards) in Seattle's efforts related to aquatic environments focusing on the areas outlined below.

- * Improvements in Water Quality
- Reductions in High Impact Creek Flows

- * Increases in Critical Habitat (Connectivity and Complexity)
- Increases in Public Private Partnerships
- * Increases in the City's Leveraging of Financial Resources

The City will issue a State of the Waters report biennially (or as needed) compiling findings from these efforts. See Appendix 3 for a detailed description of monitoring strategies and commitments.

ACTION ITEM #4. Make Strategic Changes to the City's Policy and Regulatory Framework.

City plans, policies, regulations and regulatory requirements related to aquatic environments are numerous and substantial. (See Appendix 4) The City's land use and stormwater policies and regulations are essential in efforts to improve the quality of Seattle's water resources. These policies and regulations need to be updated to reflect the most current thinking on protecting water resources. Additionally, where ambiguities and conflicts exist between these and other City policies and regulations, the City must take proactive steps to strategically balance and reconcile them. The Mayor is recommending that the following City policies and regulations be modified to better protect water resources within the City, and to clearly articulate the value the citizens of Seattle place on their in-city water resources.

- A. Formalize the resource specific aspirations and science based guidelines to guide City efforts in aquatic environments. Articulate by Executive Order, Council Resolution and/or future amendments to the Comprehensive GMA plan. See further descriptions in Action Item 1 and 2.
- B. Advance the Restore Our Waters strategy by making strategic changes in major Regulatory Updates.
- 2004 Comprehensive Plan Update and Annual Amendments -

establish policies articulating the City's interest and intent in protecting and enhancing aquatic areas.

- 2004 Environmentally Critical Areas Regulations Legislation better identify and protect Seattle riparian environments, wetlands, and areas where development of impervious surfaces increases runoff and the potential for pollutants to enter waterbodies.
- 2004 Comprehensive Drainage Plan Update advance the City's objectives in reducing stormwater runoff impacts on creeks as well as addressing stormwater pollution in creeks and receiving water bodies.
- 2005 Stormwater, Grading and Drainage Code Amendments identify options to increase flow and water quality related controls in creek drainages and encourage stormwater related retrofits of existing developments.
- 2005-6 Comprehensive Wastewater Plan— evaluate and set priorities related to wastewater system impacts on aquatic resources.
- 2009 Shoreline Master Program Update revise and enhance policies protecting and restoring shoreline habitat and public access areas.
- C. Establish regulatory frameworks to increase the effectiveness of required mitigation in our industrial areas.
- Frameworks for Shoreline Mitigation Banking As part of the Mayor's Maritime Action Strategy, centralize mitigation efforts to allow for more concentrated mitigation while lessening the impact and burden on industrial businesses. Identify high priority habitat refuge and public access opportunity sites within heavily developed shoreline areas (e.g. Lake Union/Ship Canal), that will not displace active industrial businesses. Allow private developers to contribute to a mitigation bank, rather than requiring them to offset the impact of new development on site.
- Framework for Duwamish River Habitat Restoration Develop a blueprint or other mechanisms (e.g. zoning overlay) for ensuring successful

integration of Natural Resource Damage Assessment (NRDA) related habitat restoration work within the Duwamish industrial area.

- D. Reconcile ambiguities and conflicts in City policies and regulations. Establish a forum and process to resolve issues and better integrate policy and management practices that benefit aquatic environments into City operations. Focus to include but not be limited to:
- Making street standards consistent with natural drainage system design specifications.
- * Balancing street end permitting/policies with habitat restoration, public access policy objectives, and the needs of industrial businesses in the ship canal.
- * Balancing shoreline area parking permitting/policies with water quality objectives.
- Balancing support of water dependent businesses and recreational uses with restoration of aquatic habitats.
- * Establishing a policy that identifies protection of aquatic environments and other ecologically sensitive areas as a priority use for City properties and ensures that this value is considered when purchasing new property or disposing of surplus property.
- * Establishing a process for sanctioning official City maps and reconciling/resolving disputes over wetland identification, ditches vs. creeks, piped storm drains vs. regulated riparian corridors, etc.
- E. Provide Uniform Planning and Compliance Review for City Projects. Set standard procedures for departmental planning and regulatory review of City projects that have the potential to impact aquatic environments, to ensure the City is a leader in implementing City Shoreline, ECA, and Stormwater Code requirements.
- F. Target Code Enforcement. Assess existing enforcement activities

and develop a strategy to tighten and more strategically target enforcement of existing codes.

ACTION ITEM #5. Move Forward on Priority City Capital Project Investments.

The Mayor's strategy identifies 40 priority capital investments for the City to make in restoring Seattle's creeks and shorelines over the next 10 years. These priority investments are based upon scientific guidelines in Table 1 (see action item #2) and, as a result, focus primarily upon improving water quality, slowing high impact creek flows, and restoring critical shoreline habitats. Some of the projects affirm work that is already underway. Others represent new projects identified here as a priority for future funding.

Appendix 5 provides a detailed listing and map of all 40 priority capital projects by resource area. These investments include but are not limited to the following:

- * Seven water quality improvement projects targeting Lake Washington, Lake Union, Puget Sound, and the City's inland lakes will make Seattle's waters more hospitable to fish and other aquatic organisms, and provide the citizens of Seattle with cleaner lake, creeks, and marine waters.
- * Two major sediment remediation projects for the Duwamish River and Gasworks Park, will remove hazardous materials from lake and river sediment.
- * Four natural drainage system projects (Longfellow, Pipers, and Thornton Creek) to provide neighborhoods with flood control and dramatically reduce destructive high flows in these creeks.
- Comprehensive flow control strategies (assessing natural drainage

systems, detention ponds, by-pass options, etc) to reduce flows in high impact drainages on Longfellow, Pipers, Taylor, Thornton Creeks.

- * Studies to assess and facilitate channel widening efforts on targeted sections of Fauntleroy, Longfellow, Pipers, Taylor and Thornton Creeks
- * Fourteen shoreline habitat restoration projects along Lake Washington, Lake Union, the Ship Canal, and Puget Sound to improve habitat opportunities for migrating chinook salmon, shoreline habitat for birds, other wildlife, and public access for people.
- * Green Seattle Initiative riparian reforestation projects on creeks and key shorelines.

The City will continue to pursue numerous other projects (in addition to those listed above) that will also have direct or indirect positive affects on water resources in Seattle.

ACTION ITEM #6. Make Investments to Ensure City Operations Support Improved Aquatic Health.

The Mayor's strategy proposes to better focus the City's operational efforts to restore our waters by initiating targeted, pilot evaluations of water quality best management practices (BMP's) for the City's highest impact activities. Priority pilot projects being recommended include the following:

A. Targeted street sweeping and catch basin cleaning efforts on key roadways.

- B. Two fecal coliform control pilots. One that provides bags and receptacles for pet waste collection at waterside Parks (outside of off-leash areas) and a second to address fecal sources at Matthews Beach.
- C. Strategic maintenance of targeted CSO and drainage infrastructure.
- D. A pesticide use, turf health and water quality monitoring program for select areas at creekside golf courses.
- E. Enhanced training for City workers on construction management related stormwater practices.

Spill response, compliance auditing/corrections and hazardous materials use have been identified in a second tier of areas where improved City BMP procedures would benefit Seattle's water resources in the future.

ACTION ITEM #7. Expand Partnerships with the Community and Private Property Owners to Restore Our Waters.

The actions of private property owners and community groups in our developed urban environment are key to successful restoration of degraded resources. The City can educate people about the negative effects of everyday activities and simultaneously encourage them to take positive actions to restore the environment. Removing regulatory disincentives and providing financial incentives are a tool the City can use to build partnerships with these groups, while at the same time achieving direct and measurable benefits to the City. Incentives provided by the City must also achieve a broader public benefit. In addition, they must also be accessible and be perceived as offering a 'good deal' or 'fair value' to potential recipients. Incentives can be large or small and can range from pre-approved plans and property tax reductions to plant vouchers and rain barrel discounts.

The Mayor's strategy recommends development and expansion of the following *education and stewardship* programs to assure that citizens and businesses can do their part in restoring our waters.

- A. Citizen Science Program. Under the guidance of the Seattle Aquarium citizens are trained to monitor and track changes in the nearshore ecosystem at all six Seattle marine reserves and Seahurst Park beach.
- **B.** Aquatic Resources Master Stewardship Program. Citizens and businesses are recruited and trained to act as community stewards of creeks, shorelines, parks, beaches, and natural drainage systems. They will provide the community with technical assistance, lead community restoration efforts, and act as stewards of public property.
- C. Community "Water Watchers" Education. Citizens in existing stewardship and naturalist programs can be further trained as "eyes, ears and educators" for creeks, lakes and shoreline areas and engaged in efforts to monitor and help protect their well being.
- D. Citywide Community Environmental Action Guide. Citizens and businesses can receive a publication that will outline and unify a broader set of air-land-water environmental issues/impacts faced by the City along with community based actions which they can take to help in restoring the environmental health of Seattle.
- E. Targeted 'Cleaning Up Our Act' Water Quality Public Information Campaign. Citizens and businesses can get information about alternatives to everyday activities in order to reduce adverse water quality impacts (e.g. cars, pet waste, pesticide use, and erosion/sediment).
- F. Water Quality Pollution Prevention Workshops. Citizens and businesses can participate in workshops and get technical assistance to help them prevent pollution from entering our water bodies.

G. Targeted 'Slow the Flow' Public Information Campaign. Citizens and businesses can get information on actions to slow creek flows related to stormwater, thus preserving the quality of aquatic habitat in the creeks. This would be part of the Rainwise partnerships program below.

To build further partnerships, the Mayor's strategy also prioritizes City efforts to reduce regulatory disincentives by the following means:

- H. Reduce regulatory disincentives. Work to identify and significantly lessen current regulatory disincentives and barriers for private property owners in undertaking restorative actions. Actions to focus on include, but are not limited to, the following:
- * Work with the State to modify the 200-foot shoreline delineation for shoreline restoration projects and/or removing obstacles discouraging habitat restoration.
- * Establish standard/pre-approved 'habitat friendly' plans for restoration of creek and shoreline areas.
- * Offer technical assistance and habitat friendly construction guidelines for creek and shoreline restoration plans.
- * Reduce the cost and time associated with the permit process when property owners propose to voluntarily restore shoreline and creek habitat.
- * Encourage the use of shared docks, design of habitat friendly docks, and proposals to reduce over water coverage.
- * Facilitate preservation of feeder bluffs as a source of new beach sand and gravel.

The Mayor's strategy also will *provide financial incentives* for actions that provide direct benefits to the City by, among other things, reducing the total amount of stormwater entering the City's drainage system and flowing to the City's streams, lakes and the Sound:

- I. "Rainwise" stormwater mitigation partnerships program.

 Encourage installation of rainwater cisterns, green roofs, and rain gardens, reduced impervious surfaces, and disconnection of downspouts where appropriate. This partnerships program will be guided by analysis and policy direction established in the 2005 Stormwater, Drainage and Grading Control Code Update. The incentive for these efforts will come in the form of technical assistance, materials and a possible reduction in drainage rates.
- J. Natural Drainage System Local Improvement Districts (LIDs). Partner with property owners to establish LIDs for natural drainage system improvements. These self-imposed special taxing districts will be used to pay for amenities, such as sidewalks, that are ancillary to the function of natural drainage systems.
- **K. Plants Plus Program**. Enter into agreements to provide property owners, who undertake a City approved habitat restoration effort, with appropriate native plants at low or no cost.
- L. Habitat Restoration Grant and Technical Assistance Program. Match funds for community driven channel widening, flow control, water quality, fish barrier removal and creek habitat restoration efforts by setting aside at least \$100,000 a year in funding for this purpose. This grant and technical assistance program would be administered through the Neighborhood Matching Fund (NMF) and would be in addition to existing NMF grants.
- M. Habitat Related Property Tax Relief. Undertake a coordinated effort to enroll property owners in King County's Public Benefit Rating System in exchange for long term habitat restoration and protection, thereby providing the property owner with a property tax reduction and advancing City objectives for habitat restoration.
- N. Conservation Easements Program. Work with non-profit groups and private property owners to place newly restored or currently pristine shorelines and creek properties into conservation easements.

ACTION ITEM #8. Advance Scientific Understanding and Adaptively Manage City Efforts.

While the science based investment guidelines outlined in Action Item #2 offer an excellent foundation for City efforts, Puget Sound, Lake Washington, and Seattle's urban creeks and lakes are extremely complex and dynamic environments. Additional investments in research will be necessary to advance scientific understanding of them and to assist the City in adaptively managing its restoration efforts. Below are the priority research efforts identified as part of the Restore Our Waters Strategy.

- A. Creek Type/Classification Mapping
- B. Water Quality Pollution Source Investigation and control strategy for listed pollutants in creeks and receiving water bodies
- C. Coho Pre-Spawn Mortality Investigation Land Use analysis
- D. City Critical Habitat and Habitat Condition Mapping
- E. Lake Union/Ship Canal Habitat Areas and Fish Use
- F. Sediment Recruitment and Transport in Lake Washington
- G. Sediment Recruitment and Transport in Puget Sound Marine Near-Shore
- H. City Wetland Mapping

ACTION ITEM #9. Establish a Stakeholder Group to Promote Long-Term Coordination within City Government and Among the Citizens of Seattle.

At the heart of this strategy is an effort to establish better coordination between City departments and to ensure stakeholder involvement to help guide the City's actions to foster healthier waters over the long-term. To assist

with this effort, the Mayor is forming two groups: an internal Restore Our Waters (ROW) team and an external Stakeholder Advisory Group.

The internal ROW Team will provide analytical support to the external Stakeholders Advisory Group and ensure Department actions are aligned with the City's aquatic restoration and protection goals. The Team will:

- * Recommend and review aquatic resource related updates to City plans and Code.
- * Promote the integration of Restore Our Waters action items into annual budgets and Capital Improvement Plans (CIPs).
- * Act as a clearinghouse to broker agreements between departments and resolve conflicts between City policies and the objectives of this strategy.
- * Work to leverage City investments with outside sources and coordinate related grant applications across Departments.
- * Elevate policy conflict to the Mayor's sub-cabinets for resolution.

The external Stakeholder Advisory Group will consist of scientific professionals, business and industrial community representatives, environmental and community interests, and representatives from relevant City committees and commissions. The Stakeholder Advisory Group will act as an advisory body informing high level policy, regulatory, and annual budget decisions related to water resources.

This group will also serve as a central connecting point for the active community based watershed councils and groups that provide the local knowledge base and activism focused on Seattle's water resources. These groups include, but are by no means limited to: Carkeek Watershed Community Action Project, Fauntleroy Watershed Council, People for Puget Sound, Pipers Creek Watershed Council, Puget Soundkeepers Alliance, Thornton Creek Alliance and YES for Seattle.

By establishing these teams, the Mayor seeks to ensure that the Restore Our Waters strategy will benefit from public input, but more importantly that it will become an ingrained feature of how the City operates.

RESTORE OUR WATERS – NEXT STEPS AND SEATTLE 10 YEARS HENCE

During the next biennium the Mayor will begin to implement the action items and recommendations of this report. The City will advance this strategy's priority capital projects and will apply its science-based guidelines to identify other capital projects where the City can restore our waters. The City will develop amendments to the City codes that will remove disincentives to property owners taking action on their property to improve water resources.

Additionally, the City will create regulatory frameworks for increasing the effectiveness of mitigation in industrial areas and will incorporate this strategy's principles into updates of our Comprehensive Plan, Stormwater Code, and other policy and regulatory documents. The City also will begin to develop the education and community programs outlined in this document, and create incentive programs to encourage property owners to restore their shorelines and creeks. Finally, the City will work to expand its scientific understanding of these areas, critical impacts to them and potential solutions for addressing these impacts. As this understanding grows, the City will move to adapt its efforts accordingly.

This strategy's recommended actions will have different emphases in different aquatic areas. Results will be more immediately evident in some areas and longer in coming in other areas. Here is a look at what the Mayor expects to see underway in the next 10 years.

Duwamish River, Lake Union, Portage Bay, and the Ship Canal/Ballard Locks

Regulatory Changes, Capital Projects and Operational Improvements. Over the next ten years the City of Seattle and other responsible parties under Superfund will undertake sediment remediation projects on both the Duwamish River and in Lake Union. While the cost of these projects is yet to be determined, they will likely amount to tens of millions of dollars. On both the Duwamish and Lake Union private property owners will make significant

the stormwater mitigation program, particularly if they receive a stormwater rate reduction for the installation of cisterns and other stormwater retention technology. To the extent that incentive programs geared toward residential property owners reduce overall stormwater runoff in these areas, they will also help improve water quality by reducing CSOs and the general volume of water draining to these water bodies.

Water quality pollution prevention workshops and a technical assistance guide to businesses and property owners will provide valuable information to businesses interested in reducing their impact on these water resources. This is also true of a City Community Environmental Action Guide. While neither of these guarantee modifications in behavior, they will provide businesses that wish to change their practices with valuable technical information on how they can reduce their impact on the aquatic environment.

Puget Sound Shoreline/Elliot Bay

Capital Projects and Operational Improvements. Over the next ten years the City will invest several million dollars on shoreline restoration projects in conjunction with replacement of the Alaska Way seawall. While, the exact nature of those projects is yet to be determined, the City is prepared to restore some portion of the shoreline in Elliot Bay to create shallow water intertidal habitat for juvenile salmon.

Additionally, the City will fund a major shoreline restoration project in Salmon Bay adjacent to the Ballard Locks. This project calls for shoreline restoration, revegetation and subsequent removal of several overwater structures. An adjunct to this project is an investigation into opening the mouth of Wolfe creek, and restoring a length of shoreline stretching from Commodore Park to the Burlington Northern Railroad bridge.

The City will also conduct a targeted study of areas that are suitable for shallow water habitat and bulkhead removal along the Marine Nearshore, such as Alki, Myrtle Edwards Park, Puget and Fairmont Creeks. These areas will also benefit from targeted street sweeping and drainage and CSO infrastructure maintenance BMP pilots.

investments in habitat restoration in the coming years as a result of regulatory requirements that are part of the sediment cleanups. The City is working on developing regulatory frameworks that will allow the most effective habitat investments in these important industrial areas.

In the Duwamish, the City will make about \$3 million in investment to address water quality issues in the South Park and Norfolk drainage basins. Concurrent with these investment the City is also increasing industrial source control inspection and enforcement, to stop discharge of hazardous materials before it occurs.

In Lake Union, the City intends to make a number of investments to improve water quality of the Lake and Ship Canal. The most significant investment is the continued effort to reduce CSOs on Lake Union and the Ship Canal. In addition the Seattle Department of Transportation will conduct a preliminary engineering study to identify ways to better contain and treat stormwater from the Ballard Bridge and, in the future, other bridges spanning this waterway.

Overall, these areas will benefit from City water quality investigations and targeted source control strategies for its receiving water bodies. They will also benefit from BMP pilots related to targeting street sweeping and drainage and CSO infrastructure maintenance.

To improve conditions for migratory fish, the City intends to collaborate with the Army Corp of Engineers on evaluating the development of a more natural estuary by the Ballard Locks. This is a long term effort to study the potential to construct a bypass around the locks that would function like an estuary, and would allow juvenile and adult salmon to more gradually acclimate as they travel between fresh and saltwater. The City will also work with the Army Corp of Engineers to conduct an assessment of ways to facilitate greater saltwater intrusion at the Locks.

Partnership Programs. Because of the industrial nature of the areas immediately surrounding the Duwamish, Lake Union and Ship Canal, incentive programs that can be accessed by businesses have the most potential. Commercial and industrial property owners may have an interest in enrolling in

infrastructure maintenance BMP pilots.

Partnership Programs. The City has an interest in restoring shoreline areas and creating shallow intertidal habitat. Along the Puget Sound shoreline, particularly the area stretching from Elliot Bay north, there are many private properties. There might be opportunities to restore some of these properties to eliminate bulkheads and create natural beaches. Private property owners could offset the cost of that work by enrolling in the County's Public Benefit Rating System – something the City will help them investigate. Property owners could also mitigate their property tax costs by placing some of the property in a conservation easement, which the City would work with non-profits to facilitate. Additionally, to reduce the cost of restoration work the property owner(s) could acquire some of the native plants for the restoration work from the City's proposed "Plants Plus" program, which will provide property owners who are undertaking habitat restoration efforts with appropriate native plants at low or no cost.

All of the education and outreach programs and enhancements proposed as part of this strategy will also help protect our Puget Sound shorelines. However, one of the programs, the Citizen Science Program, is designed specifically to teach citizens about the marine nearshore and the complex ecology of this area. Additionally, the Aquatic Resources Master Stewardship program will be integrated with other existing stewardship programs, including the Beach Naturalist program, and will provide an added element of community organizing and outreach about this particular resource area.

Lake Washington/Union Bay

Capital Projects and Operational Improvements. The City of Seattle owns significant amounts of property along the shoreline of Lake Washington, both at the major parks and along Lake Washington Boulevard. As part of the Mayor's strategy the City has identified ten shoreline restoration projects on Lake Washington, with four of them along Lake Washington Boulevard. The balance of the projects will take place at Rainier Beach, Sand Point Magnuson, Seward, Beer Sheya, and Martha Washington Parks.

To address water quality issues in Lake Washington, the Mayor has identified several CSO projects as priorities for funding in the next ten years. However, of critical importance to improving water quality in Lake Washington is roughly \$5 million in planned maintenance and upgrades on CSO outfalls in the Gennessee/Henderson recreational areas, and conducting focused maintenance on a set of CSO's in the Madrona/Leschi area, that are prone to summertime overflows. Overall, these resources will also benefit from City research into water quality investigations and targeted source control strategies for its receiving water bodies.

Partnership Programs. Because of the size of the area that drains to Lake Washington, all of the proposed outreach and education programs will have a positive affect on the water quality in the lake. Of particular relevance to Lake Washington, because of the number of City parks adjacent to the lake, is the outreach program to educate the public about pet waste and reduce the introduction of fecal coliform to the lake. Also, incentives that inspire private property owners to remove or reduce bulkheads and restore a natural shoreline edge to their properties will be particularly important.

Urban Creeks

Capital Projects and Operational Improvements. This strategy advances a number of projects to improve the quality of Seattle's urban creeks. Among the most critical are four natural drainage system projects, which will help improve water quality and reduce peak flow stormwater runoff to Thornton, Longfellow and Pipers Creeks. Additionally, the Mayor is recommending that the City undertake a watershed based flow control investigation, which will identify high impact drainages in each of Seattle's five salmon-bearing creeks, and suggest flow control measures the City can undertake to reduce flows. Approximately \$1.2 million has been earmarked for investigation and preliminary engineering and \$8 million dollars over the next 5 years for implementation of these flow control projects.

Additionally, the City will begin to assess and facilitate channel widening and

related habitat restoration options at select locations along creek corridors. Because large reaches of Seattle's creeks are on or adjacent to private property, these projects would likely be undertaken by private property owners. Overall, these areas will benefit from City research into the water quality investigations and targeted source control strategies. They will also benefit from water quality BMP pilots related to targeting street sweeping and drainage and CSO infrastructure maintenance. The City will also undertake a BMP pilot to work with community members to reduce fecal contamination of creeks — this will involve outreach, monitoring, public education, and providing the public with waste collection bags and containers at targeted locations. The City will continue working on the coho pre-spawn mortality investigation and water quality monitoring on creeks that run through the City's municipal golf courses. On Thornton Creek, the City will also invest in the \$6.8 million water quality project on the South Lot at Northgate.

This strategy also proposes several fish passage barrier removal projects. On Taylor Creek, the City will remove two fish passage barriers, one at Rainier Avenue South and another immediately upstream. On Longfellow Creek, the City will remove three barriers at the West Seattle Golf Course, at an approximate cost of \$2.7 million. Additionally, as part of the Mayor's Green Seattle Initiative City Departments will also commit approximately \$300,000 a year and work with other partners to reforest riparian and forest areas in the City.

Partnership Programs. The greatest adverse impact on Seattle's urban creeks, high peak flows and poor water quality, are generated by water from drainage basins that are often many square miles in size. To make headway in reducing these flows it is essential to enlist the aide of private property owners, even those far from the banks of creeks. The City will offer incentive programs to educate and encourage citizens to modify their homes or property to detain more stormwater. This program will encourage installation of rainwater cisterns, green roofs, and rain gardens, reduced impervious surfaces, and disconnect downspouts where appropriate. In exchange for making these improvements the property owner will receive technical assistance, materials and a possible reduction in drainage rates. The City will also partner with property owners to establish Local Improvement Districts

(LIDs) to fund some portions of natural drainage system projects in their neighborhoods.

The City also intends to undertake a targeted public information campaign focused on reducing adverse water quality impacts (e.g. cars, pet waste, pesticide use, erosion/sediment) and hold water quality pollution prevention workshops and provide technical assistance to businesses and property owners. These activities will be augmented by a City Community Environmental Action Guide developed to outline and unify a broader set of air-land-water environmental issues/impacts faced by the City along with community based solutions.

To help faciliate these and other private sector efforts along creeks, a habitat restoration grant program will be available to match community driven channel widening, flow control, water quality, fish barrier removal and creek habitat efforts. This grant will be administered through the Neighborhood Matching Fund (NMF) and be provided in addition to existing NMF grant funding opportunities. Owners of property adjacent to a creek, who wish to undertake restoration work on their property could also receive assistance from the Plants Plus program, enrolling their property into a the Public Benefit Rating System to reduce taxes, and by using pre-approved landscape design and restoration plans.

Inland Lakes - Green, Bitter and Haller Lakes

Capital Projects: The City's capital investments for in-land lakes are largely intended to address water quality. Approximately \$5.8 million has been earmarked over the next five year for water quality investments in the Densmore Drainage basin leading to these lakes and to specifically address sediment accumulation issues at Bitter Lake. This strategy would also supports continued periodic investments in alum treatment for Green Lake to prevent blue-green algal blooms.

Partnership Programs: While Green Lake is within a City park but

both Haller Lake and Bitter Lake have significant private ownership. Incentive and other partnership programs will help interested property owners return their shoreline edges to more natural conditions, providing better habitat for fish and birds. Additionally, all three small lakes will benefit from education programs directed at increasing water quality stewardship programs will increase the quality of the riparian edges on both public and private lands.

IN CONCLUSION

The Mayor hopes that the City's actions generate a momentum that will fundamentally change how we as a City view these critical resources, but more importantly will support citizens efforts to ROW or (restore our waters) together to make the City's aspirations for each of these resource areas a reality. Hopefully, this strategy will spark long-term commitments from the City, property owners and others that will benefit not only our children, but also their children's grandchildren.

THIS IS A PROPOSED STRATEGY THAT WILL EVOLVE OVER TIME.

TO PROVIDE FEEDBACK, or inquire about next steps, PLEASE:

- * Write a letter or send an e-mail to Mayor Nickels. Go to www.seattle.gov/mayor to find out how to contact the Mayor.
- * Contact the Mayor's Office of Sustainability and Environment at (206) 615-0817 to sign up for the Mayor's quarterly brown bag lunches on environmental issues.
- * Contact Danielle Purnell at Seattle Public Utilities (206) 233-7246 or danielle.purnell@seattle.gov.

* Connect with this Strategy's Stakeholders Advisory Group once it is formed.

APPENDIX ONE

Action Plan - timeframes, funding, funding status and responsible departments

#1. Establish Long-Term Aspirations for In-City Water Resources. (See Action Item #4A)

#2. Use Science Based Guidelines to Direct Citywide Efforts. (See Action Item #4A)

#3. Establish Clear, Quantifiable Goals and Measures of Progress. (See Appendix 3 for detailed monitoring commitments)

ACTION ITEM

Timing

Funding Status

Responsible Depts.

A. Develop Quantifiable Goals 2005-2007

TBD SPU, DPR, DPD, OSE

B. Issue a Biennial State of the Waters Report 2006 TBD

SPU, DPR, DPD, OSE

#4. Make Strategic Changes to the City's Policy and Regulatory Framework.

ACTION ITEM

Timing

Funding Status

Responsible Depts.

A. Formalize Aspirations and Guidelines

2004

N/A

Mayor's Office

B. Major Regulatory Updates

2004-2009

N/A

DPD, SPU

C. Regulatory Frameworks Shoreline/Duwamish

2004-2005

TBD

OED, DPD, SPU, SCL

D. Reconcile Policy Conflicts

2005-2007 TBD

All Depts.

E. Uniform Planning and Compliance Review

2005-2006

N/A

All Depts.

F. Targeted Code Enforcement

2005-2008

TBD

SPU, DPD, DPR

#5. Move Forward on Priority City Capital Project Investments. (See Appendix 5 for all project specific commitments)

#6. Make Investments to Ensure City Operations Support Improved Aquatic Health.

ACTION ITEM

Timing

Funding Status

Responsible Depts.

Targeted Street Sweeping Catch Basin Pilot

2005-2006

Funded

SDOT, SPU

Fecal Coliform Pilots

2005

Funded

DPR, SPU

Targeted CSO, Drainage Infrastructure Pilots

```
2005-2006
Funded
SPU
Pesticide Use, Turf Health, Monitoring Golf Course Pilot
2006
Unfunded
DPR
Construction Management Practices Pilot
2006
Unfunded
OSE, SPU, DPR, SCL
```

#7. Expand Partnerships with the Community and Private Property Owners to Restore Our Waters.

ACTION ITEM

Timing

Funding Status

Responsible Depts.

Citizens Science Program

2005

Pending

DPR

Aquatic Resources Master Stewardship Program

2006

Unfunded

SPU, DPR

Community Water Watchers Education

2006

TBD

SPU, DPD, DPR

City-wide Community Environmental Action Guide

```
2004-2005
     Funded
     OSE
Targeted 'Clean up Our Act' Water Quality Information Campaign
     2006
     Unfunded
     SPU
Water Quality Pollution Prevention Workshops
     2006
     Unfunded
     SPU
G. Targeted 'Slow the Flow' Information Campaign
     2006
     Unfunded
     SPU
Remove Regulatory Disincentives
     2006
     TBD
     DPD, SPU, OIR
Rain-wise Stormwater Mitigation Partnerships Program
     2005
     Funded
     SPU
Natural Drainage System Local Improvement Districts (LIDs)
     2004
     Funded
     SPU
Plants Plus Program
     2006
     Unfunded
     SPU, DPR
Habitat Restoration Grant and Technical Assistance
     2005
     Funded
     SPU, DON
Habitat Related Property Tax Relief
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2005
TBD
SPU, DPR, DOF
Conservation Easements Program
2006
Unfunded
SPU, OSE, DPR
```

#8. Advance Scientific Understanding and Adaptively Manage City Efforts

ACTION ITEM

Timing

Funding Status

Responsible Depts.

Creek Type/Classification Mapping

2005

N/A

SPU

B. Water Quality Pollution Source Investigation and Control Strategy

2005-2006

Funded

SPU

C. Coho Pre-Spawning Mortality Investigation

2004-2005

Funded

SPU

City Critical Habitat and Habitat Condition Mapping

2006

Unfunded

SPU, DPD

Lake Union/Ship Canal Habitat Areas and Fish Use

2005

Unfunded

SPU, DPD, OED

Sediment Recruitment and Transport Lake Washington

2007-2008

Unfunded

SPU, others

Sediment Recruitment and Transport Puget Sound Marine Near Shore

2004-2006

TBD

King County, SPU

City Wetland Mapping

2005

Funded

DPD

#9. Establish a Stakeholder Group to Promote Long-Term Coordination within City Government and Between the citizens of Seattle.

ACTION ITEM

Timing

Funding Status

Responsible Depts.

A. Establish ROW Team

2004

N/A

Mayor's Office

B. Establish Stakeholder Advisory Group 2004

N/A Mayor's Office

Departmental Key:

DOF – Department of Finance

DON - Department of Neighborhoods

DPD - Department of Planning and Development

DPR - Department of Parks and Recreation

F&F – Department of Fleets and Facilities

OED - Office of Economic Development

OIR – Office of Intergovernmental Relations

OSE - Office of Sustainability and Environment

SCL - Seattle City Light

SDOT – Seattle Department of Transporation

SPU - Seattle Public Utilities

SCL – Seattle City Light

APPENDIX TWO

Summary of Current State Conditions for Seattle's Aquatic Environments

Aquatic environments depend upon clean water and sediments; controlled

stormwater flows (for creeks); strong land water connectivity; and habitat complexity to provide healthy habitat for fish and wildlife and safe and inviting recreational opportunities for people. Evidenced by general conditions described in Table 1 below, Seattle aquatic environments are considered degraded.

Table 1

General Condition of Seattle's Aquatic Environments Marine Nearshore/Duwamish/Lake Washington/Lake Union/Ship Canal

Water Quality issues include fecal coliform, ph, dissolved oxygen, temperature. Occasional beach closures due to fecal coliform.

- * Sediment contamination found in the vicinity of some outfalls and historic industrial areas. Contaminant range from PCB's, metals, oil, bioassay, pesticides, to organics.
- * Majority (over 90%) of shoreline is armored with little riparian vegetation.
- * Reduced beach sand and gravel recruitment due to the high amount of bank armoring.
- * Significant numbers of over-water structures (piers and docks).
- * Non-native plant and fish species.
- * Lack of backshore and estuarine environments providing adequate salt and freshwater transition for migrating salmon
- * Small amount of intertidal mudflat, limited wetlands and shallow water habitat areas that serve as rearing zone for salmon and foraging fish.
- * Limited biological organisms.

Urban Creeks

Creeks experience high (torrential) flow volumes and velocities from storm water runoff.

- * High flows erode (scour) banks and streambed resulting in creek channels that are confined and incised.
- * Little substrate and too much fine sediment to support biological communities, spawning and rearing.
- * Little or no cover or flow refuge for fish.
- * Water quality issues include fecal coliform, oil, dissolved oxygen, and metals. Oil and pesticides in streambed sediment.
- * Creek banks, to varying degrees, are armored, preventing connection with the surrounding floodplain.
- * Most small creeks have been piped into offshore areas, with no natural creek

mouths.

- * Significant numbers of fish passage barriers prevent access to large reaches of creeks, varying from 50% to 90%.
- * Poor riparian conditions due to yards, buildings, few trees, and non-native vegation.
- * Salmon bearing creeks experience 25% to 90% of adult coho pre-spawn mortality. Cause unknown.
- * Limited biological organisms.

In-land Lakes

Relatively good water quality. Green Lake is an exception, characterized by high phosphorous levels and resulting algae blooms.

- * Sediment accumulations from outfalls.
- * Mixed riparian vegetation.
- * Good habitat for non-native species (milfoil and bass) poor habitat for trout.

In the Puget Sound, Duwamish, Lake Washington, and Lake Union/Ship Canal lack of shoreline refuge areas and water and sediment quality problems present the most significant limiting factors to aquatic health. Lack of shoreline refuges has been the result of extensive development and bank armoring (e.g bulkheads, riprap, seawalls, etc) along Seattle's shoreline areas. These impacts have reduced sediment recruitment, degraded shallow water habitat, and reduced riparian vegetation and associated wildlife. Water and sediment quality problems are the result of historic contamination, industrial/manufacturing operations, stormwater runoff from roads, yards, storm drain and combined sewer outfalls.

In Seattle's urban creeks, high impact stormwater flows (velocities and volumes) and water quality problems are the most significant limiting factors to these systems. High impact stormwater flows are the result of high levels of impervious surfaces and uncontrolled runoff from urban developments occurring prior to Seattle's stormwater code. High impact flows have simplified, deepened and narrowed creek channels and washed out their structure (sediment, wood) creating the equivalent of a flume. Water quality problems are the result of stormwater runoff from roads and yards, pet and wildlife wastes, and combined sewer system overflows.

For in-land lakes, sediment and other pollutant loading and non-native species while generally not considered severe are the biggest limiting factors to these systems. These issues are the result of stormwater runoff from roads, yards and City outfalls, lack of fresh water sources, extensive development and natural processes.

APPENDIX THREE

State of the Waters - Monitoring Strategies and Commitments.

In collaboration with others, the City will monitor baseline conditions and trends in Seattle's aquatic environments and report biennially (or as necessary) on the following:

1. Improvements in Water Quality

- * The City (in collaboration with others) will monitor selected, priority pollutants in receiving water bodies and specific areas of interest (including selected outfalls and public contact recreation areas).
- * CSO overflow volumes and events will be monitored including frequency and volume of summer weather overflows near public contact recreation areas and into Lake Union/Ship Canal.
- * Frequency and duration of beach closures will be reported.
- * Pre and post project measurements will be conducted on selected projects to assess the impact of City investments and targeted BMP's on improving water quality.
- * Capital project, regulatory and programmatic results focused on improvement water quality (e.g. # of infrastructure projects, # workshops conducted, attendance, # of private water quality vaults required/installed) will be reported on.

2. Reductions in High Impact Creek Flows

- * The City will monitor both baseline and defined high impact creek flows (based upon volume, velocity, frequency and duration) in selected creek basins.
- * Pre- and post- project measurements will be conducted on selected projects (natural drainage systems, etc) to assess the impact of City investments in reducing flows in selected basins.
- * Capital project, regulatory and programmatic results focused on reducing flows (e.g. # of infrastructure projects; # of rain barrels issued, # of private detention vaults required/installed) will also be reported.

3. Increases in Critical Habitat (Connectivity and Complexity)

- * The City will report on the extent and % of armored vs. natural shorelines within the City (including creeks) and ownership patterns related to that shoreline.
- * The extent and quality (e.g. native vs. invasive) of riparian and shoreline vegetation.
- * Pre- and post project measurements will be conducted on selected habitat projects (e.g. plant survival rates, fish returns, etc) to assess the impact of City investments.
- * Capital project, regulatory and programmatic results focused on enhancing habitat (e.g. # of shoreline restoration projects, shoreline regulatory actions, fish passage projects, riparian reforestation projects, etc) will be reported on
- * In partnership with others, periodically assess in-City aquatic species health and abundance by reporting on factors and changes in things such as: adult salmon returns at the Locks, in the Duwamish and spawning surveys on salmon bearing creeks; smolt trappings at key refuge points (e.g. Mapes, Rainier Beach, Herrings House) and on salmon bearing creeks; coho prespawn mortality on salmon-bearing creeks; benthic biodiversity at key refuge points and on salmon-bearing creeks and bird diversity and populations at key refuge points.

4. Increases in Partnerships and Leveraging

- * The magnitude and percentage by which City investments in aquatic ecology have been matched or leveraged by grants and other outside funding sources and in-kind commitments with be reported on.
- * The number of volunteer s active in stewardship of shorelines, beaches, creeks and natural drainage systems will be reported on.
- * Matching fund grants, rate/fee reductions, technical assistance and other incentives will be reported on.
- * Number of privately initiated and City approved restoration activities will be reported on.
- * City dollars and efforts spent to educate and engage the public related to aquatic resource protection in the City will be reported on.

Table 1 below outlines City funding commitments for key components of this monitoring strategy.

Table 1

City's Key Monitoring Commitments – Seattle Aquatic Environments Comprehensive Water Quality Monitoring Program1, 2

Regulatory Compliance and/or Support Monitoring (e.g. NPDES, TMDL, etc.) – (\$420,000/Funded)

Natural Drainage System Water Quality Monitoring (e.g. Broadview, Highpoint, etc.) – (\$400,000/Funded)

Targeted Water Quality Monitoring (e.g. temperature, B-IBI, etc.) – (\$15,000 per year/Funded)

Flow Monitoring Program

Drainage and Wastewater Flow Monitoring System Upgrade -

(\$760,000/Funded)

City-wide Flow Monitoring (e.g. NDS, Creeks, CIP performance evaluation) – (\$200,000 per year/Funded)

CSO Capital Flow Monitoring – (\$400,000 per year/Funded)

CSO Compliance Monitoring – (\$350,000 per year/Funded)

Drainage and Wastewater Operations Monitoring (SCADA pump stations) – (\$116,000 per year/Funded)

Greenwood Peat Bog (monitoring of stormwater system) – (\$200,000/Funded)

South Lake Washington Sewer Main Assessment – (\$100,000/Funded)

Highpoint Monitoring – (DOE Centennial Grant \$72,000)

Decentralized Wastewater Management – (EPA Grant \$100,000)

Habitat Monitoring Program

Post-CIP Creek Monitoring (Creek Monitoring Team) – (\$75,000 per year/Funded)

Large Woody Debris (LWD) Survey (physical integrity)—(\$15,000/Funded)

Spawning Surveys – (\$68,000 per year/Funded)

Seward Park Substrate Enhancement - (\$6,000 per year/Funded)

Beer Sheva/ Mapes Creek Fish Use – (\$2,500 per year/Funded)

Rainier Beach Lake Park and Marina Fish Use – (\$2,500 per year/Funded)

Salmon Bay Natural Area (Invertebrates and Fish Use) – (\$35,000 per year/Unfunded)

Urban Creek Watershed Assessment Study - (\$12,000 in 2007/Unfunded)

Large Woody Debris (LWD) Survey (biological integrity) – (\$60,000/Unfunded)

Coho Pre-spawn Mortality Monitoring – (\$30,000 per year/Unfunded).

Smolt Trapping – (\$8,000 per year/Unfunded)

Sediment Budget Monitoring – (\$20,000 per year/Unfunded)

West Nile Virus – (\$20,000 per year/Funded)

Note: Items that will be monitored and reported on by another agency and/or that will require little staff time and funding to assemble are not reflected in this list. (e.g. # matching fund grants awarded, # of grants received, # of shoreline regulatory actions, # of adult salmon returns at the Locks, # and duration of public beach closures).

- Not including Duwamish Superfund and Gasworks
- 2. Staff labor not included

APPENDIX 4

City Plans, Policies, Regulations and Regulatory Requirements Related to Aquatic Environments

The City's regulatory requirements as well as its own policy and regulatory frameworks governing aquatic environments are extensive and include:

* Urban Blueprint for Salmon Recovery outlining early actions to address the Chinook Salmon Threatened Species Listing. (Federal

Endangered Species Act – National Oceanic and Atmospheric Administration)

- * City's Comprehensive Plan and its environmental and land use elements with relevant policies. (Growth Management Act Washington Office of Community Trade and Economic Development CTED)
- * Seattle Environmentally Critical Areas Ordinance containing regulations intended to protect and enhance aquatic environments. (Growth Management Act -CTED)
- * Shoreline Master Program with its policies for land use and environmental protection in shoreline areas. (Shoreline Management Act Washington State Department of Ecology DOE)
- * Stormwater Grading and Drainage Control Ordinance with its stormwater flow control and pollutant source control requirements for development. (Municipal Stormwater National Pollutant Discharge Elimination System NPDES Permit 1995 Federal Clean Water Act DOE)
- * Comprehensive Drainage Plan with its policy and programmatic framework describing City actions related to stormwater management, creek drainages and NPDES permit related water quality monitoring and education requirements.
- * Combined Sewer Overflow Reduction Plan to control overflows.

(Combined Sewer Overflow National Pollutants Discharge Elimination System Waste Discharge Permit No. WA-003168-2 – Federal Clean Water Act – DOE)

- * **SEPA Ordinance** with its environmental review requirements. (Washington State Environmental Policy Act SEPA DOE)
- * Citywide Environmental Management Program and Environmental Action Agenda including environmental policies, procedures, performance monitoring, and action items governing the work of City departments.
- * Lower Duwamish Sediment Cleanup (Comprehensive Environmental Response, Compensation, and Liability Act CERCLA Environmental Protection Agency EPA- DOE)
- * Lake Union-Gasworks Park Sediment Cleanup (Model Toxics Control Act MTCA DOE)

APPENDIX 5

Priority Capital Investments

Project Description

```
Lead Dept.
     Status
<u>Citywide – Creeks</u>
Riparian Reforestation Partnerships
     1,500
     Short
     SPU/DPR
     Funded
Channel Widening and Related Habitat Restoration Assessments
     300
     Long
     SPU
     Funded
Creek Flow Control Strategies Watershed Based Investigation - Focus High
Impact Basins
     1,263
     Mid
     SPU
     Funded
Creek Flow Control Strategy Implementation (natural drainage, detention,
bypass, etc)
     8,000
     Long
     SPU
     Funded
Duwamish River
Sediment Remediation - Duwamish
     TBD
     Long
      SCL/SPU
```

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Total Funds 2004-2014*

Time Frame

```
Funded
Water Quality Improvements Duwamish - Norfolk basin
     1,450
     Mid
     SPU
     Funded
Water Quality Improvements Duwamish – South Park basin
     1,450
     Mid
     SPU
     Funded
Inland Lakes
Green Lake Alum Treatment & Monitoring
     1,500
     DPR
     Funded
Bitter Lake Water Quality Improvements (Sediment Dredging)
     410
     Mid
    SPU
     Funded
Bitter Lake Water Quality Improvements (Stormwater Vaults)
     2,662
     Mid
     SPU
     Funded
Water Quality Improvements In-Land Lakes/Lake Union - Densmore basin
     2,805
     Mid
     SPU
   • Funded
```

Lake Union/Ship Canal

```
Bridge Stormwater Treatment Assessment
     150
     Mid
     SDOT
     Unfunded
CSO - Ballard
     1,092
     Long
     SPU
     Funded
CSO - Fremont/Wallingford
     1,888
     Mid
     SPU
     Funded
Saltwater Intrusion at the Ballard Chittenden Locks - Assessment
     150
     Long
     SPU/ Army Corp
     Unfinded
Sediment Remediation - Gas Works Park Shoreline
     TBD
     Long
     SPU
     Funded
Lake Washington
CSO – Genessee Project
    4,569
     Long
     SPU
    Funded
CSO - Henderson Poject
     3,947
     Long
```

```
SPU
     Funded
Shoreline Restoration - Beer Sheva Enhancement/Mapes Creek Mouth
Daylighting
     265
     Short
     SPU/ DPR
     Funded
Shoreline Restoration – Martha Washington Park Phase 1 and 2.
     350
     Short
     DPR
     Funded
Shoreline Restoration - Sand Point Magnuson Park Northshore
     2000
     Short
     DPR
     Funded
Shoreline Restoration - Rainier Beach Lake Park
     550
     Short
     DPR
     Unfunded
Shoreline Restoration - Lake WA Blvd./Madrona Drive.
     350
     Mid
     DPR
     Unfunded
Shoreline Restoration - Lake WA Blvd/McClellan Street
     1000
     Mid
     DPR
     Unfunded
Shoreline Restoration - Lake WA Blvd/S. Adams St. Renourishment
     75
     Mid
```

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```
DPR
     Unfunded
Shoreline Restoration – Lake WA Blvd/S. Alaska St. Substrate Enhancement
     85
     Mid
     DPR
     Unfunded
Shoreline Restoration - Seward Park Nearshore Substrate Enhancement
     150
     Mid
     DPR
     Unfunded
Longfellow Creek
Natural Drainage System - High Point
     3,895
     Mid
     SPU
    Funded
Fish Barrier Removal –WSGC 12th Fairway culvert, WPA dam, culvert
downstream of SW Brandon Street
     2,750
     Mid
     DPR
     Unfunded
Pipers Creek
Natural Drainage System - Broadview Green Grid
     1,701
     Mid
     SPU
     Funded
Natural Drainage System - Venema Creek
     4.265
```

SPII Funded **Puget Sound** Shoreline Restoration - Salmon Bay Natural Area Phase 1 (revegetation) and 2 (overwater structures) 275 Short DON Funded Shoreline Restoration - Facilitate feasibility study for natural estuary at the **Ballard Locks** 150 Long SPU/ Army Corp Unfunded Shoreline Restoration - Commodore Park to Railroad Bridge/Daylight Wolfe Creek Mouth 600 Long DPR/SPU Unfunded Shoreline Restoration - Alaska Way Seawall - Elliot Bay shoreline habitat improvements **TBD** Long SDOT/SPU Unfunded Shoreline Restoration – Feasibility study for bulkhead removal and shoreline restoration. (Including Alki, Fairmont Creek, Puget Creek, Myrtle Edwards Park) TBD Mid SPU/DPR

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Mid

Unfunded

Taylor Creek Shoreline Restoration – Facilitate removal of submerged woodpile at the mouth of Taylor Creek. 75 **Short** DPR, SPU Unfunded Fish Barrier Removal - At Rainier Ave and Immediately upstream 625 Mid **SPU Funded Thornton Creek** Natural Drainage System - Pinehurst 4,358 Mid **SPU** Funded Northgate Water Quality Project(s) 6,818

Total:

66,853←

Mid SPU

Funded

*Costs in thousands of dollars

← Does not include Projects with costs To Be Determined (TBD)

Lead Department Abbreviations

DPR - Department of Parks and Recreation

SPU - Seattle Public Utilities

SDOT - Seattle Department of Transportation

DON – Department of Neighborhoods

SCL – Seattle City Light

Army Corp - U.S. Army Corp of Engineers

Time Frame

Short Term - 1 to 2 years

Mid Term - 3 to 5 years

Long Term - 5 to 10 years

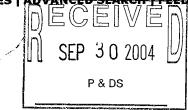
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how do we live here?

by ED HUNT | posted.1.13.99 |



I'VE SAID IT BEFORE: Growth is THE issue in the Northwest. The increasing population and development of land impacts the environment and the quality of our lives more than any other issue we'll face in the coming years.

The natural wonders of this place draw increasing numbers of people to make their homes here. Yet, locking the doors won't help, half our population growth comes from new births. Everyone needs a place to live. The problem is that every house and road we build makes this place a little less wonderful.

Solving this problem—answering the question of "How Do We Live Here?"—requires some Big Ideas. We've found out the hard way that there are pitfalls to simply <u>limiting growth</u>. We can't just put a lid on the number of houses we build.

Instead, we have to build houses that don't impact the environment.

Civil engineer Tom Holz says the current system of trying to mitigate the damage of big subdivisions is misguided. Paving and building on the land is <u>ruining streams for salmon</u>.

If we insist on putting up new subdivisions, we must adhere to the principles of <u>Zero Impact Development</u>, Holz argues. "Zero Impact" might be a misnomer, but Holz is demanding a radical change in the way we build new homes.

Holz's Big Idea goes directly to the heart of living in a rain forest. To protect the quality and vitality of watersheds, he argues, we must greatly reduce the amount of impermeable surfaces that keep rainwater from soaking into the ground and evaporating back into the air.

Short of just not building the houses in the first place, the only way to do that is to leave more forests and build much narrower homes and roads. We also have to get rid of sidewalks and curbs as well as the drains, pipes, and storm water retention ponds that are now required infrastructure for every new housing development.

That describes a very un-suburban subdivision.

Holz's idea runs counter to dozens of current regulations and in some cases even Washington state's existing growth management laws.

Over the years we've tried to make sprawl more livable. We've written laws demanding such things as sidewalks, curbs and wide residential streets--all of which damage the

"the world will not evolve past its current state of crisis by using the same thinking that created the situation."

-albert einstein

WHAT'S THE **BIG IDEA?** At the start of this year, I collected three Big Ideas in a special Hunt and Peck series to kick off 1999. Now that the year is wrapping up, it seems appropriate to take a second look at these essays and to starting thinking about what the Big Ideas will be in 2000. Please send me your thoughts on other Big Ideas and I'll research them and write about them in Jaunuary 2000. I'll

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natural functioning of the watershed.

We've got to admit this practice of assaulting a watershed with a huge subdivision, then trying to mitigate the damage with a massive storm water infrastructure, just can't work in the long run.

also post a collection of the most interesting responses.

Even when a conventional subdivision goes in far from a stream, the rainwater that would normally be absorbed by the soil, gets sent rushing off the land in higher volumes and velocities. Streambeds are scoured and habitat is destroyed.

PART ONE ZERO IMPACT DEVELOPMENT

As the land loses its ability to store rainfall, the volumes of water increase to cause more flooding as well.

PART TWO
THE NEXT
INDUSTRIAL
REVOLUTION

In a healthy, functioning watershed, only about 10 percent of rain sticks to trees. Close to 40 percent is soaked up by plant roots and rubble to be released back into the air. Only half the water soaks into the ground and makes its way to streams and rivers, Holz says.

PART THREE THE SHRINKING FUTURE

Take a forest and turn it into a suburb and almost all the water that falls as rain has to be collected, channeled and sent down stream. Holz says streambeds start to degrade when just five percent of a watershed is developed. When coverage gets to 20 percent, most streams are destroyed.

Most housing developments currently exceed 75 percent.

Holz calls for new subdivisions to have taller, thinner homes with underground parking. Most of the trees would be left standing and homes would be at least 100 feet apart. Lawns--which don't absorb runoff well-- would be avoided. Streets would be narrow, driveways would be gravel strips. Grass could be grown on rooftops and basement cisterns could capture some rainfall to make up for the footprint of the house.

The bottom line is that how we build each and every house and road is just as important as how many we build

The most important part of this Big Idea is that the ecological needs and restrictions of the place MUST be incorporated into the design--not tacked on in some afterthought, cookie-cutter mitigation.

We have to learn to make our homes "fit" into a functioning watershed. Our place on the land must be able to work with the local natural machine.

Currently we build houses that don't "fit," then spend tons of money creating a mechanical infrastructure to make up for the fact that the house doesn't belong there in the first place. We create expensive machines to take the rain water away. We create expensive machines to treat our waste. We create machines to do what nature was already doing. The question is not "how should be develop?" But rather, "how can we fit in?"

Like most Big Ideas this one sounds crazy and makes perfect sense at the same time. It sounds crazy because it is so different from what we're doing. But if what we're doing isn't working, isn't something drastically different called for?

We might find out soon if things play out as Holz contends. He's convinced that the <u>Endangered Species Act</u> will shut down developments that impact salmon bearing streams in the Puget Sound. That might be just the incentive needed for developers to turn Zero Impact Development into their standard operating procedure.

NEXT: Why Eco-Efficiency is a Dead End....

-30-

-Ed Hunt is the editor of the <u>The Tidepool</u>. He works from his home in Southwest Washington. <u>Hunt</u> and <u>Peck</u> appears each week on Friday in Tidepool.-

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Seattle Urban Nature Project



Our Mission & Goals



Mapping

Involvement

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Our Project

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Our Habitat Maps

Seattle Public Library

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The Top 15 Most Popular	ALL FOOLS' DAY Daylight-saving Time Begins						WORLD HEALTH DAY
Sports as ranked by the National	8	9	10	11	12	13	14
Sporting Goods Association.	PASSOVER Palm sunday					GOOD FRIDAY	
Sport total in millions percentage change from 1998 Exercise Walking 80.8 4.1% Swimming 57.9 -0.6% Camping Vacation/Overnite 50.1 7.8% Exercising with Equipment 45.2 -2.0% Fishing 46.7 7.1% Bicycle Riding 42.4 -2.6% Bowling 41.6 3.9% Billiards/Pool 32.1 -0.4% Basketball 29.6 0.7% Golf 27.0 -1.8% Hiking 28.1 3.3% Roller Skating (In-line) 24.1 -11.0% Aerobic Exercising 26.2 1.9% Boating, Motor/Power 24.4 -4.9% Running/Jogging 22.4 -0.7%	ge 8 EASTER	16	17	18	19	20	21
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2001

APRIL



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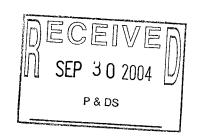
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Shoreline Comprehensive Plan &

Surface Water Management Master Plan Committee

Committee Meeting

September 29, 2004



Terry De Lavallade's address to Committee:

My name is Terry De Lavallade. I live at 17247 11th Ave NE, in Shoreline. My family has lived there since 1994.

Our yard and home has flooded over a dozen time in the last year and three times last month.

My neighbors, ex-neighbors, the Camerinos purchased their home on the corner of 175th and 11th Avenue NE in 1996. This is a young blue-collar family with four children aged kindergarten through high school. Their home, a 3 bedroom, one level, provided no where for them to go when the storm water came in. Their home is filled with mold, mildew and rot. The City of Shoreline denied their claim for damages. Knowing that the flooding would continue and unable to afford the repairs themselves, last month the Camerinos abandoned their home. They were able to convince their mortgage company, Beneficial Finance to 'buy back' their home for the balance owing. Having lost the equity in their Shoreline home, they could only afford a small rental in Edmonds. In one respect, they consider themselves lucky. They were able to walk away from their home of eight years without having to file bankruptcy or go into the foreclosure process.

The Camerinos were also able to obtain a boundary exception for their oldest son, Cedric, to finish his senior year at Shorecrest. Their second eldest son had eagerly looked forward to starting high school at Shorecrest this year. He began his freshman year in another school district.

This is not to say that they have not suffered losses. Their hopes of being homeowners are over for the foreseeable future. They also suffered loss of personal property, household items, furniture, etc. The worst loss, I would think, is the sense of community and trust in the system.

The Camerions are not my only neighbors that, along with us, have suffered loss of personal property and use of our yards and homes.

Both King County and Otak Engineers have recommended the purchase of property and creation of a retention pond to solve this flooding issue. The Camerinos property is available. The home is not salvageable. At the September 20th Council workshop, I strongly urged the City of Shoreline to consider the purchase of this property and additional properties if necessary for the development of a retention pond.

Since that meeting, my husband, Duane and my neighbors, the Ruhlmans' and Harverys' have met with representatives from the city. Shoreline's representatives offered a manual pumping system until a permanent 'fix' can be determined and implemented. They spoke of capping the infamous south pipe and installing a new pipe that will direct the storm water to a ditch that runs along the west side of 10th Avenue NE south of

175th. They also indicated that the company responsible for building the storm drains along the south side of 175th between 15th and 11th avenues will be asked to re-install those drains. Since their installation last spring, storm water flows over and around, but not into the drains. As it is now, storm water proceeds down 175th and into the Camerinos property and our property.

These representatives implied that the recommended purchasing of private properties was not a viable option in this situation. Their resistance to developing a retention pond is understandable as, at present, they are using our properties, our yards and homes, as a retention area without compensation. I wonder if the people who are making these decisions are aware of the volume of water we are talking about. I wonder how long it will take for the small ditch along 10th Avenue to fill and overflow onto the street or some else's yard; how soon it will fill with silt and stop infiltrating into the ground.

I want to believe that with these corrections to the Serpentine Place Project, our flooding issues will be resolved. Shoreline's representatives have assured us that this is a top priority for them and that construction should begin within the next 4 to 6 months. I want to believe that they will stick to their timeline, as well. We've been paid enough 'lip service' over the years. We are ready for truthful answers for a permanent solution.

Thank you for your consideration.