

## **PARAMOUNT PARK NEIGHBORHOOD GROUP**

940 NE 147th St

Shoreline, WA 98155

September 27, 2004

### **COMMENTS ON SHORELINE COMP PLAN AND MASTER PLANS UPDATE**

To Whom It May Concern:

I represent the Paramount Park Neighborhood Group as President. We are a neighborhood organization which looks after the well-being of Paramount Park, its environment and the surrounding neighborhood. As such, I wish to present this comment on the Shoreline Comprehensive Plan and Master Plans Updates.

#### **Housing Element -**

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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 "anadromous 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 known 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 and 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 example 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 go along with this strategy.

## **PARKS, REC. AND CULT. SERVICES MASTER PLAN**

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- We have serious concerns about some of the suggested CIP projects for Parks, specifically relating to Paramount Park. We ask to be consulted before any projects are approved, as representative of the neighborhood.

These items raise questions about Paramount Park (pg 97 of Staff Report)s-

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Boundary Survey -Address Encroachment - ?	\$15,000.
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Habitat Enhancements/Debris Removal -?	\$250,000.

**What are the implications of all these proposals? Who asked for them?  
How and when would they be implemented? We deserve an answer to these questions!**

• 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 appreciate 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,

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 be restored where possible by removing *fill*. Impervious surfaces should be replaced 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 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](mailto:info@seattleurbannature.org)

This excellent organization could be contracted 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 by phasing out ALL toxics, including pesticides, herbicides, fungicides, non-natural fertilizers and any other toxic uses. All uses of *toxics use 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.

These are just some of our concerns. Other members may also present their comments. We ask to be notified of any changes or further hearings in this matter as "party of record" and request legal standing.

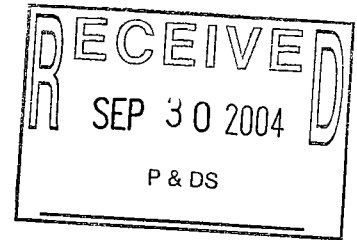
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Respectfully Submitted,

  
Janet Way, President  
Paramount Park Neighborhood Group

September 28, 2004

Ms Andrea Spencer  
Shoreline Planning Commission  
17544 Midvale Ave N  
Shoreline, WA 98133-4921

Dear Ms Spencer,

We feel there should not be a traffic circle at 160<sup>th</sup> and Greenwood. It would be too dangerous for the elementary children, as well as, the college students to walk to school.

It is our understanding that the people were against it when the college held their vote as to what people wanted. We wonder why this would even be brought up again? It is obvious there is no way that changing that one corner will take care of the traffic problem at the college. When a school is built for 2500 students maximum and there are three times that many, it should be obvious what the problem is!

It would be bad for the neighbors waiting for an aide car or fire truck, also, hard for articulated buses to maneuver.

Everyone seems to think having someone on hand to direct traffic is the most efficient and cheaper way to take care of the corner.

Respectfully yours,

A handwritten signature in cursive script that reads "Paul + Beverly Smilanich".

Paul and Beverly Smilanich

Cc: Shoreline council members

September 28 2004

City of Shoreline Planning Commission  
Shoreline, City Hall  
17344 Midvale Avenue North  
Shoreline, WA 9833-4921

Re: Proposed "Traffic Circle" – Intersection of N. 160<sup>th</sup>/Greenwood Ave. N./  
Innis Arden Way

To Whom it May Concern:

A few years ago I spent six weeks in Australia and had first hand experience with what they call "turnabouts" (A/K/A "traffic circles". Traveled many, many miles in our rental car. There were numerous "turnabouts" during our trip but never a one in a heavily populated or business area – only in the lesser travelled countryside.

It is from the various traffic counts of 10,000 vehicles per day at the captioned intersection (said counts made by those "in the know") a "traffic circle" is the most impossible scene I can imagine!!!! It becomes even a worse scene with the anticipated increase in enrollment at Shoreline Community College.

Is anyone interested in the safety of the Highland Terrace Elementary School children who walk to school and must cross that intersection? A number of college students that are "walkers" are also involved. How about all the parents that drive their elementary school kids to HT and pick them up after school as well? How about the Metro articulated busses? How about all the HT school busses? Access and egress for emergency vehicles? Is it true that the three houses at three corners of the intersection will be purchased by the City of Shoreline and demolished to create the space necessary for the "traffic circle"? Who is providing the funding for this project? The City? The State? The Feds? What will be the cost of this proposed project regardless of where the funding comes from? Some answers, please.

Sincerely,

Carol L. Bernard  
15558 Palatine Avenue North  
Shoreline, WA 98133  
Tel: (206) 363 9784



## Shoreline Planning Commission

September 28, 2004

Written Comment

I urge the City of Shoreline to not move forward with the proposed 'traffic circle' at 160<sup>th</sup> St + Greenwood Ave N.

I am concerned of this location + this option to improve the traffic flow for the following reasons :

1) Increased danger to pedestrians, especially children attending Highland Terrace Elem School - This seems contrary to page 54 + your recommendations for the Master Plan

2) Speed<sup>limit</sup> of vehicles approaching cross-section vary from street to street. Traffic circles encourage aggressive driving behavior.

3) Size of 'traffic circle' + its impact on housing + green belt on cross-street.

The neighborhood has already spoken + voted negatively for this choice.

Sincerely

Paul Payton - 15721 Palatine Ave N, Shoreline 98133  
Home Tel: 206 - 361 - 6079

Please leave this form with the clerk at the end of the meeting.

This is a public record



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
Region 4 Office: 16018 Mill Creek Boulevard - Mill Creek, Washington 98012 - (425) 775-1311

September 30, 2004

City of Shoreline  
ATTENTION: Andrea Spencer  
17544 Midvale Avenue North  
Shoreline, Washington 98133-4921

Fax 206-546-8761

Dear Ms. Spencer:

**SUBJECT: Washington Department of Fish and Wildlife (WDFW) Comments on the City of Shoreline Comprehensive Plan Update; Log number GC-G0858-01**

Thank you for the opportunity to comment on the Comprehensive Plan Update.

I appreciate and strongly support the intent of city staff to manage Thornton Creek as anadromous salmon habitat, as shown in the staff report comment summary table, line item 72. The observed presence of an adult steelhead north of 155<sup>th</sup> Street on February 4, 2004, is consistent with other non-verified reports we have received over the years of apparent coho salmon adults in Twin Ponds. Apparently the culverts on Thornton Creek in Seattle, the WSDOT culvert under I-5, and the dam at Peverly Pond, are all passable by strong adult salmonids at some flows. In the 1990's Tony Oppermann of WDFW witnessed steelhead spawning in Thornton Creek close downstream of Jackson Park, so we know the barriers in the lower watershed in Seattle are not complete blockages to all anadromous fish. The City of Seattle is working on replacing the partial barriers to salmonids on Thornton Creek in their jurisdiction, and we expect the I-5 culvert and Peverly dam will be made fully passable by WSDOT someday. Therefore we expect salmonids of average strength to be able to swim to Shoreline in Thornton Creek in the future, joining the especially strong fish that are presently making that migration. The trip would certainly be worthwhile for coho adults because the rearing habitat of Twin Ponds is excellent, as shown by the rapid growth rate of the wild cutthroat trout which are in there now.

Stormwater remains a severe issue for salmonids in urban areas, because water rapidly flowing off impervious surfaces causes streams to flow too violently for salmon to be able to thrive. But Low Impact Development for individual projects, and Natural Drainage Projects for neighborhood redevelopment, show great hope for getting this problem under control. I request that the City of Shoreline add to its Comprehensive Plan, and to its Master Plan for Surface Water Management, strong intention and/or requirements for use of these techniques in the City of Shoreline.

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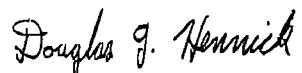
Low Impact Development causes most or all rainwater that falls on a developed site to infiltrate into the ground, where it is purified by soil chemistry and soil organisms, and where it eventually flows into streams via springs. The Puget Sound Water Quality Action Team has a good start for learning how to do Low Impact Development, at [www.psat.wa.gov/Publications/LID-studies/LID-approaches.htm](http://www.psat.wa.gov/Publications/LID-studies/LID-approaches.htm). Also the Low Impact Development Center at [www.lowimpactdevelopment.org](http://www.lowimpactdevelopment.org) seems to be a good site for learning what this technology is all about and how to do it. I request that the City of Shoreline require low impact development techniques for all individual development and re-development projects unless there is an exceptionally strong reason why a specific project must be exempted.

The City of Seattle has demonstrated that whole neighborhoods can be upgraded to both make them more beautiful, and to make virtually all precipitation go into the ground. Decision makers from the City of Shoreline can view the results of these efforts at the Broadview Green Grid Natural Drainage Project in the Piper's Creek watershed. Palatine Avenue North, 1<sup>st</sup> Ave NW, and 2<sup>nd</sup> Avenue NW, all from N 110<sup>th</sup> Street to N 107<sup>th</sup> Street, have been enhanced in this manner and are ready to be viewed. These streets run parallel to the contours of the hillslope. NW 107<sup>th</sup> Street and NW 110<sup>th</sup> Street, both from Greenwood Avenue to 3<sup>rd</sup> Avenue NW, show the "cascade" technique for retrofitting with natural drainage streets that run straight downhill. (The project on NW 107<sup>th</sup> Street is presently newly constructed, so the workings of the facilities can presently be viewed, and NW 110<sup>th</sup> Street presently demonstrates how the projects look when they are more mature.) I hope your city leaders can view these sites. They have beautified the neighborhoods, and helped to restore the stream in that watershed. Present studies show that only 2% of annual precipitation flow off those neighborhoods on the surface, meaning 98% of the rain either goes into the ground, or evaporates. Water springing out of the ground in inconvenient places due to these projects has not occurred. Next year the City of Seattle will start retrofitting the Pinehurst neighborhood in the Thornton Creek watershed downstream from your city. This will be a continuation of the extensive projects for restoration of Thornton Creek that Seattle has been doing in recent years. To complement Seattle's efforts Shoreline needs to restore the watershed in the headwaters of Thornton Creek. I request that in addition to requiring Low Impact Development for individual projects Shoreline accomplish Natural Drainage Projects for existing development at a reasonable rate over the next few decades, to enhance the watershed by managing stormwater with this technique. James R. Johnson of Seattle Public Utilities staff at 206-684-5829 would be a good person to start with to learn how such projects can be effectively designed.

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Thank you for the opportunity to provide this information. If you have any questions, please contact me at (425) 379-2303.

Sincerely,

A handwritten signature in cursive script that reads "Douglas G. Hennick".

Douglas G. Hennick  
Area Habitat Biologist

DGH:dgh

### Three Comments on the Comprehensive Plan Update, 30 Sep 04

1. The combination of land use and environmental sections is artificial. The goals of land use and environmental regulation are different. This combination can only serve to weaken the environmental regulations, which have already been compromised severely in Shoreline. I also disagree with the new policy ENd which would focus wetland and habitat improvements to where it would result in the greatest benefit. I think this is a code for not protecting critical areas in the Thornton Creek Watershed, where I live. State LAW says ALL wetland and habitat connected with streams and critical areas should be protected. Is Shoreline going to totally ignore state law.

2. I am very concerned with comments at the Planning Commission Meeting of 29 Sep 04 indicating that the City plans to use parks for detention. Mr. Stewart has said that before this is done the water would be cleaned in Bioswales.

Well, I am certainly in favor of cleaning water that is already going into parks to the extent that it can be done. However, bioswales are very imperfect cleaning mechanisms, depending on considerable maintenance and careful design to work at all. Furthermore, they fail when the water most needs to be cleaned, i.e., during storm surges. So they should only be used to clean up water already going into parks, NOT to be used to treat water and then consider it safe enough to dump in clean creeks and ponds. In particular, the ponds in the restoration area of Paramount Creek are fed by reliably clean spring water. Please do not consider taking storm water runoff, trying to clean it in a bioswale, and then dumping it into the restoration area. Because the bioswale is almost certain to fail at some point, in which case polluted water will flow into the clean pools.

3. I also need to make a comment regarding plans to fix the storm water problem on 175<sup>th</sup> and 11<sup>th</sup> by running the water South down 11<sup>th</sup> Ave. I know you need to do something for the people who are experiencing flooding near 175th. However, there are many areas south of that in which flooding is also a real or potential problem. I live about a mile south on 152<sup>nd</sup> and 11<sup>th</sup> NE, and often have my yard flood (but not the house yet). At least two other homes in my area already flood. So you need to be careful where you are sending the water from so as not to simply shift the flooding to another area.

Chris Eggen  
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