

Heather Maiefski

From: Heather Maiefski
Sent: Friday, August 26, 2022 4:59 PM
To: Courtney Ewing
Subject: RE: [EXTERNAL] SEPA comments for new Brea Development

Hello Courtney,

Thank you for reaching out and submitting your comments. I have entered you as a party of record which means you will receive notification when a SEPA Threshold Determination has been issued. Based on current workflows, the first round of review for this project is expected to be complete by the end of September and typically there's at least 2-3 rounds of review, so a SEPA determination is several weeks out. Please note that your comment has been forwarded to the applicant and all reviewers. Also, the applicant has not submitted their arborist report at this time but the City is expecting to receive the report prior to our first round of review. I would be happy to share that report with you once received. I'm hoping to have an ETA on that next week.

Best Regards,



Heather Maiefski, Associate Planner
Pronouns: (She/Her)
Planning & Community Development Department
17500 Midvale Avenue N, Shoreline, WA 98133
P: 206-801-2556
F: 206-801-2788
hmaiefski@shorelinewa.gov

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For permit submittal questions email pcd@shorelinewa.gov or call 206-801-2500.

From: Courtney Ewing <ccewing@gmail.com>
Sent: Friday, August 19, 2022 3:18 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Cc: City Council <Council@shorelinewa.gov>
Subject: [EXTERNAL] SEPA comments for new Brea Development

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Hello Ms. Maiefski,

Below are my comments / questions in red regarding the new Brea development SEPA checklist submittal. Additionally, regarding the traffic study, why was N 179th St not analyzed?

Best Regards,
Courtney Ewing
Shoreline Resident

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

A geotechnical report has been prepared by Associated Earth Sciences Northwest (ESNW), dated April 7, 2021. A Site reconnaissance assessment for critical areas was provided by Talasaea Consultants, Inc. on May 19, 2021. A stormwater report was provided by Blueline, dated May 10, 2022. A traffic impact analysis prepared on March 29, 2022, by TENW.

What about an arborist report?

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

There are no known pending governmental approvals that will directly affect this project. We note that there are a number of projects within the vicinity of the project that are in various stages of development. These projects are not expected to have an effect on this project.

This is an inaccurate statement. The developer is aware of the proposed Modera development, which is less than 4 blocks south of this proposed development and will include a single 7-story building with 400 units. Construction of both developments is anticipated to occur concurrently, and they will both most definitely affect each other, especially in terms of construction vehicles and street traffic.

B. Environmental Elements

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Heavy equipment operation and worker's vehicles will generate exhaust emissions to the local air. Construction activity on site could also stir up exposed soils and generate dust into the local air. The completed project will result in a minor increase in the amount of exhaust related pollutants in the local air from project related traffic.

This is an understatement. Major increase due to tenant vehicles and idling delivery & utility vehicles.

What about HVAC emissions?

What about tenant smoking? More than 1 in 5 Seattleites smoke (nicotine and/or marijuana). This includes during construction and maintenance.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

It is expected that any off-site sources of emissions or odor will not affect the proposal.

What about the emissions from dump trucks / cement trucks / construction & supplies? Based on the construction of Friends Church and Ronald Commons - there will be dozens of dump trucks daily driving down N 182nd St and/or N 179th St.

3. Water

b. Ground Water:

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Existing structures are currently served by the City of Shoreline Wastewater system. The new residential buildings will also connect to the City of Shoreline Wastewater system.

The developer did not fully answer the original questions.

c. Water runoff (including stormwater):

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No, the natural discharge location will be maintained and runoff will be attenuated to achieve the flow control requirements set forth by the City of Shoreline

If the project involves re-grading, isn't there a likelihood of the drainage patterns being altered? Also, if they plan to remove all of the existing trees, there will definitely be alteration of the current drainage pattern.

4. Plants

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

All of the vegetation within the proposed development areas will be removed including trees, shrubs, and other understory plants.

How many trees will be cut down? Arborist report?

c. List threatened and endangered species known to be on or near the site.

There are no known endangered plant species known to be on or near the site.

Developer should provide a study.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Proposed landscaping will include a mix of native and adaptive/drought tolerant non-native species. All perimeter and parking lot island will be landscaped as well as open space areas.

How many trees will be planted? How will they be maintained to ensure their survival?

5. Animals

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

Examples include:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other: racoon, opossum, other small rodents

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

This list is incomplete. Bald eagles, crows, jays, hummingbirds, etc. have been observed on and near the property. Mammals not listed include squirrels, rabbits, and bats. The developer is misrepresenting the impact of their development on the environment and quality of life of the neighborhood, including people and animals.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electric, natural gas, and/or solar will be used to meet the project's energy needs for heating and cooling.

Didn't Shoreline City Council "ban of the use of fossil fuels in new commercial and large multi-family construction projects for space heating and most water heating as well as [add] numerous other increases in energy efficiency" in Ordinance 498, 6 December 2021?

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

The building will be constructed to meet or exceed applicable local, state and/or federal building and energy codes to ensure compliance with energy conservation. The building will be LEED-Platinum, or equivalent.

Why not propose participating in Shoreline's waste wise recycling program for large multi-family developments? EPA.gov says on average 1.16 pounds of recycled material per person per day. If there are 800 new tenants, that's 6,496 lbs per week and 337,792 pounds per year. In this day and age, it's unethical to build this high-density development without considering recycling.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

This proposed project will not create any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste.

What precautions will be used during the demo to ensure no issues with lead paint / asbestos?

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

There are no known existing hazardous chemicals/conditions that might affect project development and design including underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

What about removal of existing sewage piping and potential methane gases?

b. Noise

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

The site is adjacent to Aurora Ave N and near local grocery stores and other shops. Typical sound from vehicle traffic and distribution trucks can be expected. No other atypical noise is expected following the completion of the proposed project.

This is an incomplete answer. The site is also across the street from single family homes, which will definitely be affected by the proposed project.

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

On a short-term basis, construction activities will increase the peak on-site noise levels. All construction will occur during Shoreline approved hours of operation. The completed project would result in a slight increase in ambient noise levels in the vicinity.

This is a gross understatement. The addition of more than 700 new tenants, their pets, their vehicles, and associated delivery & service vehicles will bring more than a "slight increase of ambient noise" to the immediate neighbors across Linden Ave.

8. Land and Shoreline Use

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

The complete project will result in 386 residential units with a mixture of single and multi-bedroom units.

Insufficient response. The Question asks how many people, not units. Surely the developer has an approximate number based on previous developments.

10. Aesthetics

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

The proposal will minimally impact views in the immediate vicinity.

The applicant's response is misleading and false. The current residents along Linden Ave will have a significantly altered view. Their current view is of trees and greenery; the new view will be a 7-story building with minimal greenery. The trees are the view.

11. Light and Glare

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

The completed project will generate limited light and glare as typically associated with multi-family facilities.

The applicant is minimizing the amount of new light pollution from the windows of the new 7-story building on the current residents across Linden Ave. Additionally, there will be significant car headlights and taillights shining on the single-family homes across Linden Ave from the Linden Ave vehicle entrance / exit. The new generated light and glare may be typical for a multi-family facility, but this size of facility is not typical in the neighborhood.

d. Proposed measures to reduce or control light and glare impacts, if any:

Buffer vegetation will be planted along the perimeter of the subject property to prevent light trespass from the site. Lights near neighboring properties will be shielded to reduce light spillover into these areas. Also, there will be no upward distribution of light.

Proposed buffer vegetation will be insignificant compared to the buffered that would result from keeping at least some of the existing western perimeter trees.

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The site is immediately adjacent to Aurora Ave N (Highway 99). Linden Avenue, N 182nd St, and N 180th St will provide points of access to the proposed development.

This statement is not accurate. N 180th street is not a through street from Linden Ave to Fremont; however, N 179th St is, and it will be affected by the new tenants and their delivery & service trucks utilizing it to avoid backup on other streets.

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

A connecting pathway will be provided at the south boundary of the site to establish a through connection of N 180th St.

Will this be a pedestrian / bicycle pathway? Or an extension of the street?

Could the developer propose a redevelopment of the N 182nd & Aurora intersection to add in a stop light or at least modify the medians? This would allow vehicles traveling east on N 182nd to turn left (north) on Aurora where they are currently restricted to right turns only. This would help alleviate the additional traffic flow on Linden Ave, which is a 2-lane street.

15. Public Services

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

The proposal will result in a slight increase in need for police, fire, and public transit services due to the proposed increase of residents.

FALSE. The immediate neighborhood (Linden to Fremont and N 175th to N 185th consists of less than 100 single family homes, some duplexes, a couple group homes, less than a dozen condos, and few small apartments, the soon-to-be-demolished Garden Park apartments, and the Linden Highlands Apartments (82 units). Not including the Modera development (which this applicant is definitely aware of), there are less than 600 people currently living in the described area. The proposed development will add at least 700 new tenants. The applicant's response to the question is completely inaccurate and misleading. This project will have a significant impact. The need for police, fire, public transit, schools, school buses, etc. will have a noticeable increase to the neighborhood. And what about utilities? What will be the effects of this proposal and the Modera proposal on the water main?

16. Utilities

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other

Natural gas? - What about Ordinance 948 multi-family projects over three stories in height?

Heather Maiefski

From: Heather Maiefski
Sent: Friday, August 12, 2022 4:07 PM
To: Darlene Howe
Subject: RE: [EXTERNAL] Fwd: Development at 18002 Linden Ave N and 18005 & 18019 Aurora Ave N- correction

Hello Darlene,

Thank you for reaching out. I have entered you as a party of record. Please see my responses to your questions below in green. Also, feel free to reach out with further comments/questions/concerns throughout the review process.



Heather Maiefski, Associate Planner
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From: Darlene Howe <dmhowe1@icloud.com>
Sent: Tuesday, August 9, 2022 8:30 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Subject: [EXTERNAL] Fwd: Development at 18002 Linden Ave N and 18005 & 18019 Aurora Ave N- correction

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CORRECTION: on the WEST side of Aurora Ave N, specifically Linden Ave N.

Sent from my iPad

Begin forwarded message:

From: Darlene Howe <dmhowe1@icloud.com>
Date: August 9, 2022 at 6:36:02 PM PDT
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Subject: Development at 18002 Linden Ave N and 18005 & 18019 Aurora Ave N

Hello Ms. Maiefski,

Would you please clarify is this proposed development to be 7 stories on both the Aurora Avenue N and the Linden Avenue N sides? This project is required to comply with the transition area requirements per SMC 20.50.021 which requires “a 35-foot maximum building height for 10 feet horizontally from the required building setback, then an additional 10 feet of height for the next 10 feet horizontally, and an additional 10 feet in height for each additional 10 horizontal feet, up to the maximum height allowed in the zone.”

I ask this because I remember the residents in the Richmond Highlands neighborhood were told that the Comprehensive Plan for the east side of the Aurora Avenue Corridor between N 175th and N 185th was to be designed in a wedding cake manner with the Aurora Avenue N side having up to a six story development that would stair step down to a maximum three story development on the Linden Avenue N side. Is that still the development code? As stated above the building step back is still required from Linden Ave N. Please see the diagram below which was provided in the plan set demonstrating compliance with the building step back requirements.



If not, when did that change and what did it change to?

Can you please advise how many of the trees on these parcels are recognized as being significant and how many are being saved? I have

not had a chance to review the proposal yet in detail. Given my current review queue, I don't anticipate getting to it until the end of September, but from a quick glance it looks like they are proposing to remove all trees. The applicant has not submitted their arborist report at this time but the City has requested that one be submitted prior to our first round of review.

Will there be additional hearings? No, there will not be a hearing required for this project. When will the decision be made? The SEPA determination will not be made until staff is ready to approve the project. Typically, there are multiple rounds of review before a project is ready for approval.

I would like my comments and questions, and the answers to the questions, to be entered into the public record. You have been entered as a party of record.

Please advise how I may request and obtain a copy of the decision. Since you're listed as a party of record you will receive the SEPA determination once its issued.

Sincerely,
Darlene M. Howe, resident
745 N. 184th Street
Shoreline, WA 98133

Sent from my iPad

Heather Maiefski

From: Heather Maiefski
Sent: Friday, August 26, 2022 4:34 PM
To: Deborah Phillips
Subject: RE: [EXTERNAL] Brea development

Hello Deborah,

Thank you for reaching out and submitting your comments. I have entered you as a party of record which means you will receive notification when a SEPA Threshold Determination has been issued. Based on current workflows, the first round of review for this project is expected to be complete by the end of September, so a SEPA determination is several weeks out. Please note that your comment has been forwarded to the applicant and all reviewers.

Best Regards,



Heather Maiefski, Associate Planner
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From: Deborah Phillips <leaderdeb@hotmail.com>
Sent: Friday, August 19, 2022 3:54 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Cc: City Council <Council@shorelinewa.gov>
Subject: [EXTERNAL] Brea development

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I have lived in this neighborhood for years and am very concerned about the new Brea development that will be developed where the ice arena currently is located. Because this is being rushed through, I am concerned that the developer is grossly misrepresenting the real impact of this on the community.

Traffic in the area will worsen thus making it very difficult for cars and pedestrians. I regularly use a walker or wheelchair and fear how this new development will impede my navigation at any time on Linden Avenue and on 182nd Street. Especially during the construction phase, I am justifiably concerned that the area will lack

access for disabled people (others too - not just me). I do not drive and need to be able to walk to/from Fred Meyer so please make sure that during construction, there will be ADA access for all people with walkers and wheelchairs on Linden Avenue. As you know, many drivers already get rather impatient with other cars and become very irritated and impatient with pedestrians, especially if they walk slow or are disabled.

Please heed ADA access requirements during the construction phase and upon completion of this project.

Thank you,

Deborah Phillips

leaderdeb@hotmail.com

Heather Maiefski

From: Heather Maiefski
Sent: Friday, August 26, 2022 4:28 PM
To: Kathleen Russell
Cc: Melody Fosmore; Susanne Tsoming
Subject: RE: [EXTERNAL] FW: DEV22-1642 - arborist report and question

Hello Kathleen,

As with any project in the City we will continue to except comments past the comment period deadline.

Thank you,



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From: Kathleen Russell <krussell@russell-gordon.com>
Sent: Wednesday, August 17, 2022 3:54 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Cc: Melody Fosmore <melodyfosmoredesign@gmail.com>; Susanne Tsoming <stsoming@frontier.com>
Subject: Re: [EXTERNAL] FW: DEV22-1642 - arborist report and question

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Hi Heather – Save Shoreline Trees is aligned with residents in the area who are also providing SEPA comments on the Brea project. Does the extended deadline to August 19 apply to all parties? We all have interest in the arborist report on this project.

Kathleen Russell
Save Shoreline Trees/Communications

From: Heather Maiefski <hmaiefski@shorelinewa.gov>
Date: Friday, August 12, 2022 at 3:23 PM
To: Kathleen Russell <krussell@russell-gordon.com>
Subject: RE: [EXTERNAL] FW: DEV22-1642 - arborist report and question

Hello Kathleen,

I apologize for my delay in getting back to you. Thank you for reaching out. I have entered you as a party of record. Please see my responses to your questions below in green. Also, feel free to reach out with further comments/questions/concerns throughout the review process.



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From: Kathleen Russell <krussell@russell-gordon.com>
Sent: Thursday, August 11, 2022 11:31 AM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Subject: [EXTERNAL] FW: DEV22-1642 - arborist report and question

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Hi Heather – Please let me know if you are able to answer the question regarding SMC 20.50.021(B) in item 2 below and also if you can provide the arborist report, or if there is someone else I should contact? Save Shoreline Trees Advisory Board will be responding to this project via public comment. We understand the deadline is August 19. We request the information in items 2 and 3 as this information pertains to our comment. Thank you. – Kathleen Russell

From: Kathleen Russell <krussell@russell-gordon.com>
Date: Monday, August 8, 2022 at 5:52 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Subject: Re: DEV22-1642

Hi Heather,

On behalf of Save Shoreline Trees, I do have questions regarding DEV22-1642.

1. It is stated in the Notice of Permit Application – [Optional SEPA DNS Process](#). Does this mean there will not be a public SEPA hearing? The proposed development requires a Site Development Permit and a Building Permit which are both Type A applications. Type A applications do not require a public hearing. Typically Type A applications are also exempt from notice requirements except when SEPA is triggered, then a public comment and appeal period is required.
2. Does SMC code SMC 20.50.021(B) pertaining to the retention of trees along Linden Ave N apply to this project? Per SMC [20.50.021\(B\)](#) “Twenty percent of significant trees that are healthy without increasing the building setback shall be protected per SMC 20.50.370.” Please note that part of that sentence says “without increasing the building setback” so an arborist report is required to be submitted. If the applicant can demonstrate that setbacks would need to be increased in order to save trees, per arborist recommendations then this provision would not apply.
3. Is there an arborist report available as it is not listed in the [posted documents](#)? The applicant has not submitted their arborist report at this time but the City is expecting to receive the report prior to our first round of review. I would be happy to share that report with you once received. Please note that although the SEPA comment period ends on August 19th, the City will continue to accept comments throughout the review process. The first round of review is not expected to be complete until the end of September.

Please list Save Shoreline Trees as a party of record, c/o krussell@russell-gordon.com

Thank you,

Kathleen Russell
Save Shoreline Trees/Communications

Heather Maiefski

From: Heather Maiefski
Sent: Friday, August 26, 2022 4:21 PM
To: Kelly Fletcher
Subject: RE: [EXTERNAL] Apartments

Hello Kelly,

Thank you for reaching out and submitting your comments. I have entered you as a party of record which means you will receive notification when a SEPA Threshold Determination has been issued. Based on current workflows, the first round of review for this project is expected to be complete by the end of September, so a SEPA determination is several weeks out. Please note that your comment has been forwarded to the applicant and all reviewers.

Best Regards,

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hmaiefski@shorelinewa.gov

-----Original Message-----

From: Kelly Fletcher <kellyannmccann@hotmail.com>
Sent: Wednesday, August 17, 2022 12:41 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Subject: [EXTERNAL] Apartments

CAUTION: This email originated from outside of the City of Shoreline. Do not click links or open attachments unless you recognize the sender and know the content is safe.

After reviewing the plans for the proposed Modera Apartments on Linden Ave N, I would like to add my name to the growing list of concerned neighbors who live near Shorewood High School and this proposed building. (now buildings)

I am fully aware of the city's future plans for high density multi-family housing. The Postmark on 175th and The Current on Westminster are good examples of well planned large apartment complexes that have added new citizens and revenue for our great little big city. Both of these buildings have more than one access road for entry and parking.

Linden Ave is a struggling road. It's the primary fast track for first aid response going south to Shoreline citizens. I ask the city and it's planner to reconsider the size, scale and most importantly access to this very oversized building. Seconds count in an emergency, and planning for a building should always heed warning from first responders who themselves have voiced concerns over access and response time by this proposed size of building.

Thank you,

Kelly Fletcher

Heather Maiefski

From: Heather Maiefski
Sent: Friday, August 26, 2022 5:14 PM
To: Derek Blackwell
Subject: RE: [EXTERNAL] Comments on SEPA 18005 Aurora Ave N, Brea, proposed by LUXE APTS, LLC

Hello Derek,

Thank you for reaching out and submitting your comments. I have entered you as a party of record which means you will receive notification when a SEPA Threshold Determination has been issued. Based on current workflows, the first round of review for this project is expected to be complete by the end of September and typically there's at least 2-3 rounds of review, so a SEPA determination is several weeks out. Please note that your comments have been forwarded to the applicant and all reviewers.

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From: Derek Blackwell <derekindeed@hotmail.com>
Sent: Friday, August 19, 2022 4:55 PM
To: Heather Maiefski <hmaiefski@shorelinewa.gov>
Subject: [EXTERNAL] Comments on SEPA 18005 Aurora Ave N, Brea, proposed by LUXE APTS, LLC

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August 19, 2022

Please make me a party of record for the proposal for 18005 Aurora Ave N, Brea proposed by LUXE APTS, LLC .

The SEPA questions I'm commenting on are in normal text.

The replies from Dalton Arndt are in italics.

Excerpts from letters to and from city staff and city documents are underlined.

My comments are in caps. Apologies, I don't wish to shout, but I think it's important my comments appear in context and I hope this makes them easier to view. I've used bold occasionally for emphasis.

Thank you,
Derek Blackwell
Resident of Shoreline

COMMENTS ON SEPA ENVIRONMENTAL CHECKLIST
AND
TRAFFIC IMPACT ANALYSIS
FOR PROPOSAL BY
LUXE APTS, LLC /
BREA
18005 Aurora Ave N, Shoreline WA 98133

A. Background

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site.

The proposed development will result in the demolition of all existing structures, hard surfaces, and on-site utilities as necessary to facilitate improvements. The site will be developed to include two residential buildings providing 386 units with a drive-aisle to access surface and subsurface parking facilities.

SEVERAL SMALLER BUILDINGS INSTEAD OF TWO LARGE BUILDINGS WOULD BE A GREAT ADVANTAGE TO AVOID SPREADING HIGHLY TRANSMISSIBLE VIRUSES. I SEE NO INFORMATION ON AIR HANDLING SYSTEMS IN THE SITE PLAN. THE STRUCTURES AS PROPOSED WOULD LIKELY HAVE ONE CENTRAL SYSTEM. CORONAVIRUS HAS BEEN TRANSMITTED THROUGH SUCH SYSTEMS.

LUXE PROPOSES TO STRETCH CITY CODE TO IT'S ABSOLUTE LIMIT, LEADING TO SAFETY, HEALTH AND CLIMATE EMERGENCY CONCERNS, SEE BELOW.

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Heavy equipment operation and worker's vehicles will generate exhaust emissions to the local air. Construction activity on site could also stir up exposed soils and generate dust into the local air.

SMALLER STRUCTURES AND FEWER UNITS WOULD IMPACT THE SURROUNDING AREA LESS.

*The completed project will result in a **minor increase** in the amount of exhaust related pollutants in the local air from project related traffic.*

477 VEHICLES WOULD NOT PRODUCE A "MINOR" INCREASE IN EXHAUST.

NO EMISSIONS ESTIMATE GIVEN.

THE WORDS EMISSION, EXHAUST AND POLLUTION ARE NOT MENTIONED IN THE TRAFFIC IMPACT ANALYSIS.

THE WORD EXHAUST IS MENTIONED ONLY TWICE (ABOVE) IN THIS DOCUMENT.

THE PROPOSED 386 UNITS, AND 477 PARKING SPACES, WOULD LEAD TO SUBSTANTIAL EXHAUST FROM GENERAL TRAFFIC AND VEHICLES IDLING WHILE WAITING IN LINE.

THE RISK OF ENVIRONMENTAL HAZARD FROM THIS TYPE OF SITUATION WAS **RAISED BY CITY COUNCIL ON 8/1/22.**

https://shoreline.granicus.com/MediaPlayer.php?view_id=4&clip_id=1385

SEE 46:15 - **COUNCIL MEMBER MORK** QUESTIONS CAMERON REED, ENVIRONMENTAL SERVICES PROGRAM MANAGER, ABOUT EMISSIONS FROM VEHICLES IDLING DURING THE DISCUSSION OF CITY OF SHORELINE **RESOLUTION 494 - DECLARATION OF CLIMATE EMERGENCY**. CM MORK CLEARLY STATES HER QUESTION IS IN RESPONSE TO CONCERNS RAISED BY MYSELF AND COURTNEY EWING DURING PUBLIC COMMENT AT 24:00 AND 18:00. OUR COMMENTS DIRECTLY CONCERN THE NEIGHBORING AND SIMILARLY SIZED CONSTRUCTION PROJECT, MODERA SHORELINE, BUT ALSO APPLY TO THIS PROPOSAL.

RESOLUTION 494, PAGE 8a-43 STATES -

"WHEREAS, an inventory of 2019 greenhouse gas emissions for Shoreline and its municipal operations demonstrates Shoreline is not on track to meet the Cities Race to Zero/ICLEI150 targets, **with the largest emissions sources being transportation fuel use and fossil fuel-based building heating systems...**"

<http://cosweb.ci.shoreline.wa.us/uploads/attachments/cck/council/staffreports/2022/staffreport080122-8a.pdf>

PROPOSING A BUILDING THIS LARGE, WITH MORE PARKING SPACES THAN UNITS, IS CONTRARY TO RESOLUTION 494. THE LUXE APTS PROPOSAL NEEDS TO BE MODIFIED. THE BUILDING SIZES SHOULD BE SIGNIFICANTLY REDUCED, A LOWER RATIO OF VEHICLES TO RESIDENTS IS NEEDED. AN UPSCALE COMMUNITY SUCH AS THAT PROPOSED WOULD ALSO HAVE MANY DELIVERY VEHICLES, AMAZON, UBER EATS, ETC. WHICH WOULD CONTRIBUTE TO INCREASED EMISSIONS.

THIS IS ONE OF THE MOST EXTREME EXAMPLES PRESENTED TO SHORELINE SO FAR OF A CONSTRUCTION PROPOSAL THAT WOULD ADVERSELY CONTRIBUTE TO CLIMATE EMERGENCY AND NEEDING MITIGATION ABOVE AND BEYOND CURRENT CITY CODE, NOW, NOT IN THE FUTURE. THIS WOULD BE NEEDED FOR THE POTENTIAL INCREASE IN EMISSIONS MENTIONED ABOVE, AND MANY OTHER REASONS, SEE BELOW.

There will be no regular source emissions from the building.

INCORRECT. THERE WOULD BE CARBON MONOXIDE EMISSIONS FROM THE LARGE, UNDERGROUND, UNDERGROUND PARKING AREAS. AS REQUIRED BY THE STATE OF WASHINGTON'S ADOPTION OF INTERNATIONAL MECHANICAL CODE, EACH GARAGE WOULD HAVE CARBON MONOXIDE SENSORS TO RELAY SIGNALS TO A FAN SYSTEM, WHICH WOULD EMIT CARBON MONOXIDE TO THE SURROUNDING AREA WHEN EXHAUST REACHES AN UNSAFE LEVEL.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Where available, the contractor will aim to improve the fuel efficiency of construction equipment by minimizing idling time, maintaining all construction equipment in proper working condition, and training equipment operators how to properly use the equipment; alternative fuels such as propane or solar will be favored to power generators on site; and watering of exposed surfaces will occur frequently to control the spread of dust.

THE PROJECT IS TOO LARGE AND ILL FITTED TO THE RESIDENTIAL SURROUNDINGS AND WOULD BE DETRIMENTAL TO THE HEALTH OF LOCAL RESIDENTS.

4. Plants [help]

a. Check the types of vegetation found on the site:

X deciduous tree: alder, maple, aspen, other

X evergreen tree: fir, cedar, pine, other

X shrubs

X grass

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

All of the vegetation within the proposed development areas will be removed including trees, shrubs, and other understory plants

THIS PROJECT WOULD NEEDLESSLY DESTROY MANY HEALTHY TREES.

THESE TREES CURRENTLY PROVIDE A COOLING SYSTEM TO CURRENT HOUSING AND THE SURROUNDING AREA. THIS PROJECT WOULD INCREASE TEMPERATURES SUBSTANTIALLY TO THE SURROUNDING AREA.

THIS PROJECT OPPOSES THE CITY OF SHORELINE'S 2021 RESOLUTION NO. 494 - DECLARATION OF CLIMATE EMERGENCY. <http://cosweb.ci.shoreline.wa.us/uploads/attachments/cck/council/staffreports/2022/staffreport080122-8a.pdf>

SEE COMMENTS ABOVE ON EMISSIONS 2.a.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electric, natural gas, and/or solar will be used to meet the project's energy needs for heating and cooling.

THIS ANSWER IS VERY VAGUE. WHAT PROPORTION OF NEEDS WILL BE MET WITH SOLAR?

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The building will be constructed to remain at or under the maximum height requirements as set forth in Shoreline Municipal Code. It is not anticipated that the proposal will affect potential use of solar energy by adjacent properties.

DISINGENUOUS ANSWER. THIS PROPOSAL SPECIFIES BUILDINGS 70 FEET HIGH, BLOCKING SUNLIGHT TO NEIGHBORING BUILDINGS IN ALL DIRECTIONS, AND INTERFERING WITH SOLAR DEVELOPMENT.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

This proposed project will not create any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste.

REALLY?

b. Noise

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

On a short-term basis, construction activities will increase the peak on-site noise levels. All construction will occur during Shoreline approved hours of operation.

THE QUESTION ASKED IS - "INDICATE WHAT HOURS". THIS QUESTION HAS NOT BEEN ANSWERED.

The completed project would result in a slight increase in ambient noise levels in the vicinity.

477 MORE VEHICLES ON THE STREET WOULD NOT BE A "SLIGHT INCREASE". THIS WILL CAUSE NOISE POLLUTION IMPACTING PRIVATE HOMES ON LINDEN AVE N.

3) Proposed measures to reduce or control noise impacts, if any:

Construction activity will be limited to hours as specified by Shoreline which will mitigate the impacts of potential construction noise.

WHAT HOURS SPECIFICALLY? AGAIN, THIS QUESTION HAS NOT BEEN ANSWERED.

9. Housing

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

20% of the total units will be affordable, low-income units. Approximately 77 of the 386 units will be affordable while the remaining 309 of the 386 units will be market rate.

20% IS THE BARE MINIMUM.

SHORELINE NEEDS TRULY AFFORDABLE HOUSING NEAR BUS LINES.

WILL THESE UNITS REALLY BE AFFORDABLE ?

10. Aesthetics

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

*The tallest height of the proposed structure **will not exceed 70ft.***

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

*The proposal will **minimally impact views** in the immediate vicinity.*

DISINGENUOUS ANSWER. ALL THE RESIDENCES ON THE WEST SIDE OF THESE PROPOSED BUILDINGS WOULD NEVER SEE MORNING SUNLIGHT AGAIN.

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

The project will undergo the City's Administrative Design Review to match aesthetic interested and standards for the zone.

THIS PROPOSAL STRETCHES CITY CODE TO IT'S ABSOLUTE LIMIT. IT IS VERY ILL SUITED FOR THE SETTING. SEVERAL SMALLER BUILDINGS WOULD FIT IN THE THE NEIGHBORHOOD FAR MORE APPROPRIATELY.

14. Transportation

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The site is immediately adjacent to Aurora Ave N (Highway 99). Linden Avenue, N 182nd St, and N 180th St will provide points of access to the proposed development.

THE **SAFETY CRISIS** CAUSED BY THIS WOULD BE PRIMARILY IMPEDED TRAFFIC FLOW ON LINDEN AVE N. THIS WOULD INTERFERE WITH **EMERGENCY VEHICLE RESPONSE TIME.**

LINDEN AVE N IS AN ARTERIAL FOR EMERGENCY VEHICLES ALTHOUGH IT IS ONLY TWO LANES WIDE. A NEIGHBOR ASKED THE CITY FOR SPEED BUMPS IN 2021, HERE'S THE REPLY FROM **RANDY WITT, DIRECTOR OF PUBLIC WORKS** (SEE ATTACHED LETTER)-

"Regarding your specific question about speed humps, Linden Avenue N is an arterial and therefore is not eligible for physical traffic calming devices since it serves as an important connection for emergency vehicle response, trucks, buses, and relatively high volumes of traffic."

FOR YEARS TO COME SHORELINE WOULD RISK **FATALITIES AND INJURIES** DUE TO EMERGENCY VEHICLE DELAYS AND FRUSTRATED DRIVERS AT PEAK HOURS. AN UPSCALE COMMUNITY SUCH AS THAT PROPOSED WOULD ALSO HAVE MANY DELIVERY VEHICLES, AMAZON, UBER EATS, ETC. WHICH WOULD CONTRIBUTE TO REDUCED TRAFFIC FLOW NOT TAKEN INTO ACCOUNT BY THE TRAFFIC IMPACT ANALYSIS.

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

Yes, the site is currently served by a number of bus routes with stops located within 100ft of the proposed development.

THE PROPOSAL DOES NOT MAKE USE OF THE OPPORTUNITY TO PROVIDE MORE, MUCH NEEDED AFFORDABLE HOUSING TO THOSE WHO WOULD MAKE USE OF BUSES.

MOST RESIDENTS OF AN UPSCALE COMMUNITY WOULD NEVER RIDE THE BUS.

MOST WOULD DRIVE TO WORK, OR THE LINK LIGHT RAIL, MORE THAT A MILE AWAY.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The project will provide 473 parking stalls to support residents and guest/future resident stalls.

SEE COMMENTS ABOVE ON EMISSIONS 2.a.

THIS PROJECT OPPOSES THE CITY OF SHORELINE'S 2021 RESOLUTION NO. 494 - DECLARATION OF CLIMATE EMERGENCY. <http://cosweb.ci.shoreline.wa.us/uploads/attachments/cck/council/staffreports/2022/staffreport080122-8a.pdf>

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

According to the Traffic Impact Analysis prepared by TENW, the proposal will result in 1,059 new weekday trips with 147 net new trips occurring during AM peak hour and 82 during the PM peak hour.

THIS WOULD CONTRIBUTE TO REDUCED TRAFFIC FLOW, DUE TO LINDEN AVE BEING A TWO LANE STREET. SEE COMMENTS 14.a. and 2.a.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The proposal will not interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area.

DURING CONSTRUCTION MANY TREES WILL BE REMOVED

h. Proposed measures to reduce or control transportation impacts, if any:

The applicant will comply with Shoreline transportation impact fees.

AS I STATED IN MY **LETTER TO FIRE CHIEF COWAN** ON 6/22/22

"As I understand it, the purpose of this fee is to construct new fire stations as needed. This, however, would do nothing to alleviate an overly congested area where two fire stations are already nearby. Ms. Dedinsky put it best - **"You can't build your way out of congestion"**."

15. Public Services

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

*The proposal will result in a **slight increase** in need for police, fire, and public transit services due to the proposed increase of residents.*

377 UNITS WOULD NOT RESULT IN A SLIGHT INCREASE, IT WOULD RESULT IN A GREAT INCREASE.
SEE MY COMMENTS ABOVE IN 14.h.

COMMENTS ON TRAFFIC IMPACT ANALYSIS

PREPARED BY DEVCO, LLC, BELLEVUE, WA

Project Proposal. At full buildout, the proposed DevCo Shoreline Apartments project would include the development of 386 multifamily dwelling units on an existing site that is currently occupied by an ice-skating rink, a single-family detached home, and a 6,416 SF storage warehouse, all of which would be removed as part of the project. An existing surface parking lot primarily used by vicinity car dealers for inventory parking lot overflow would also be removed. Parking would be provided by 473 on-site parking stalls. Vehicular access to the proposed development would be provided by one (1) full access driveway on N 182nd Street and one (1) full access driveway on Linden Ave N. For this analysis, a full buildout horizon year of 2024 was used.

Trip Generation. The proposed DevCo Shoreline Apartments is estimated to generate 1,059 net new weekday daily trips, with 147 net new trips occurring during the weekday AM peak hour (32 in, 115 out), and 82 net new trips occurring during the weekday PM peak hour (54 in, 28 out)

Site Access. All controlled movements at both proposed site access driveways on Linden Ave N and N 182nd Street are expected to operate at acceptable levels (LOS B or better) in 2024 with 95th percentile queues anticipated to be less than 25 feet during the PM peak hour.

THAT SOUNDS UNBELIEVABLY OPTIMISTIC. 95TH PERCENTILE? WHAT'S THE 100TH PERCENTILE. VERY SELECTIVE INFORMATION IS DISCLOSED HERE. MORE TRANSPARENCY, PLEASE. NO FURTHER INFO IS PROVIDED IN TABLE 6.

**QUOTE FROM COMMENTS ON THE TRANSPORTATION IMPACT ANALYSIS
FOR 17802 LINDEN AVE N, MODERA**

PREPARED BY TRANSPOGROUP, KIRKLAND, WA, MAY 2022 FOR MILL CREEK RESIDENTIAL
PAGE 7

<https://www.shorelinewa.gov/home/showpublisheddocument/56482/637946127266900000>

"In addition to the pipeline projects listed above, there are plans being contemplated for a similar sized residential apartment building located along the east side of Linden Avenue N, north of the project site. City staff indicated that this pipeline project to the north had not applied for permits or submitted a traffic study and need not be assumed as part of the future cumulative condition for the proposed project TIA. **When a traffic study for the pipeline project to the north is completed, it will account for the 17802 Linden Avenue N proposed project in the future conditions analysis to understand cumulative traffic impacts.**"

THE PROJECT DESCRIBED ABOVE MUST BE BREA, 18005 AURORA AVENUE N. THERE IS NO OTHER SUCH PROPOSAL NEARBY.

THE TRANSPORTATION IMPACT ANALYSIS QUOTED ABOVE (FOR MODERA) WAS PREPARED MAY 2022 (EXACT DATE NOT GIVEN).

THIS TRAFFIC IMPACT ANALYSIS (FOR BREA, 18005 AURORA AVENUE N.) WAS PREPARED BY DEVCO, LLC MARCH 29, 2022 AND DOES NOT TAKE INTO ACCOUNT THE PROPOSAL AT 17802 LINDEN AVENUE N (MODERA).

FURTHER ADJUSTMENTS NEED TO BE MADE TO THIS TRAFFIC IMPACT ANALYSIS TO MEET THE REQUIREMENT QUOTED ABOVE.

HOWEVER, IT MAY HAVE BEEN IMPOSSIBLE TO HAVE THIS INFORMATION ON MARCH 29, 2022 SINCE THE MODERA TRANSPORTATION IMPACT ANALYSIS MENTIONED ABOVE WAS NOT PREPARED UNTIL MAY 2022 (EXACT DATE NOT GIVEN) AND NOT SUBMITTED TO THE CITY OF SHORELINE UNTIL JUNE 22 2022, ONLY TWO DAYS BEFORE THE BREA TRAFFIC IMPACT ANALYSIS WAS SUBMITTED ON JUNE 24 2022. **THIS WOULD APPEAR TO HAVE BEEN IMPROPER, AND PERHAPS DELIBERATELY DISHONEST.** THERE WOULD NOT HAVE BEEN ENOUGH TIME TO PREPARE THIS TRAFFIC IMPACT ANALYSIS IN ONLY TWO DAYS.

FULL DISCLOSURE TO THE PUBLIC IS NEEDED AS TO HOW THE SITUATION DESCRIBED ABOVE CAME ABOUT.

SEE BELOW, MY ENTIRE LETTER TO FIRE CHIEF COWAN ON 6/22/22

THIS MAINLY SPECIFIES PROBLEMS WITH THE PROPOSAL FOR MODERA, 17802 LINDEN AVE N, BUT MANY OF THE SAME ISSUES APPLY TO THE PROPOSAL FOR BREA, 18005 AURORA AVENUE N, WHICH SPECIFIES EVEN MORE PARKING SPACES, SEE BELOW, COMMENTS IN BOLD. BREA IS ALSO MENTIONED BELOW AS CONTRIBUTING TO TRAFFIC FLOW AND SAFETY ISSUES, AS WELL AS THE TRAFFIC IMPACT ANALYSIS ISSUE DESCRIBED ABOVE.

Dear Chief Cowan,

I spoke by phone with Derek LaFontaine who encouraged me to write to you with concerns over emergency vehicle response and proposed construction on Linden Ave N.

Mill Creek Residential Trust proposes construction of a 400 unit apartment building, Modera Shoreline, to replace Garden Park Apartments at 17802 Linden Ave N, Shoreline, WA 98133. Plans available here.

<https://www.moderashoreline.com/>

As you can see, the southwest corner of this property is directly adjacent to Fire Department property.

To the best of my knowledge, the application for this development has not been submitted to the City of Shoreline yet, but should be very soon. The city has indicated the application should meet building code (TC-2) and be approved (see attached letter from Rachael Markle).

The development proposed is excessively large for the surroundings. Access is only possible from the west side, on Linden Ave N, a two lane street, and Mill Creek propose only one vehicle entrance for 450 parking spaces. This would cause traffic bottleneaking interfering with emergency vehicle response, as well as undue noise and air pollution from vehicles waiting in line. This could be lessened by an additional vehicle entrance (which Mill Creek have stated in neighborhood meetings they will not provide) and by reducing the size and scale of this proposed gargantuan structure.

What's additionally shocking to the neighborhood is the sheer number of other large residential buildings being planned within just a few blocks of this, and city center, which together will certainly increase traffic congestion and exacerbate delays to emergency vehicles.

Luxe/Brea (DevCo), 18002 Linden Ave N and 18005 Aurora Ave N, 386 units (greater portion facing Linden Ave N)

Shea Shoreline Phase II, 18551 Aurora Ave N, 166 units

Shea Shoreline Phase I, 18815 Aurora Ave N, 315

192 Shoreline (Crux), 19022 Aurora Ave N, 250 units

Geo II, 18004 Midvale Ave N, 215 units

Vail Two, 18110 Midvale Ave N, 210 units

Of these, the two largest would be on Linden Ave N, within about 600 feet of one another. At least Luxe/Brea would have vehicle access to both Linden Ave N and Aurora Ave N. The Mill Creek proposal is exceptional in that it is very ill suited for the surroundings.

Linden Ave N is an arterial for emergency vehicles. A neighbor asked the city for speed bumps in 2021, here's the reply from **Randy Witt, Director of Public Works** (see attached letter) -

"Regarding your specific question about speed humps, **Linden Avenue N is an arterial and therefore is not eligible for physical traffic calming devices since it serves as an important connection for emergency vehicle response, trucks, buses, and relatively high volumes of traffic.**"

I spoke with the US Postal Service carrier who regularly delivers mail on Linden Ave N. He summed it up efficiently - "WHAT? 400 Units? One driveway? On a two lane street? THAT'S CRAZY. Yes please speak to City Hall. Thank you, I support you."

I also spoke with management of Linden Highlands apartments, and Ronald Commons, nearby the site. Managers at both locations agreed this would be an excessive number of units for the surroundings, and that there needed to be more vehicle entrances.

For years to come Shoreline would risk fatalities and injuries due to emergency vehicles delays, frustrated drivers at peak hours, and pedestrian hazards nearby Shorewood High School, about 300 feet south of the site on N 175th St, also a two lane street at this junction and already an area of high traffic congestion at peak hours.

The preliminary plan shows a second vehicle entrance on the south end of the building designated for fire vehicles only, which we were told during the first neighborhood meeting would also be used for deliveries and move ins. This would be only marginally helpful in reducing traffic congestion.

To be clear - the plan shows two vehicle entrances for residents on two levels, but these are both on the north side of the proposed building with only one access way to Linden Ave N, so this would be one entrance/exit to the street for resident vehicles.

Vehicle access for residents to Aurora Ave N would help alleviate congestion. The southern end of the property would be ideal, but that would necessitate gaining a right of way through Shoreline Fire Department property, so this is obviously not an option. If the driveway north of the building site, from Aurora Ave N to Hopelink and Ronald United Methodist Church, could somehow be linked, this might help, but would require access through Brotherton Cadillac property which seems very unlikely.

The city traffic engineer, Kendra Dedinsky, spoke with me graciously, but explained that her review of the third party transportation impact analysis, to be submitted with the Mill Creek proposal, would not be altered by other new developments in the planning stage, and since this is the "first one in" it could not take into account traffic from the "second one in" (Luxe/Brea, 600 feet north, and other nearby buildings being planned). She also made it clear to me that although the impact analysis has not been submitted yet, she expected it would pass her review, and that she could not directly ask for another vehicle entrance to alleviate congestion, but... that even if she could, she has no interest in doing so; her vision for Shoreline includes greatly increased traffic which she thinks the streets can handle.

Ms. Dedinsky's response, and that of City Planning, to the question of emergency vehicle response, is that the traffic

and population impact would be offset by the impact fee required by the Fire Department. As I understand it, the purpose of this fee is to construct new fire stations as needed. This, however, would do nothing to alleviate an overly congested area where two fire stations are already nearby. Ms. Dedinsky put it best - "You can't build your way out of congestion".

My concern (shared by many neighbors) is not just to a simple increase in traffic, but a routine traffic bottleneck; cars waiting in line from two directions to get into one entranceway, blocking local traffic, emergency vehicles, school buses, and no doubt, a large number of Amazon delivery vehicles. The Mill Creek proposal calls for the minimum affordable housing units, more parking spaces than units, a pet spa, and a barbecue area. **This is intended to be an upscale development and would have many deliveries.**

The plan is to welcome lots of cars. The building site is a short walk to several nearby bus lines, including Route 301 and E Express, and would be ideal for affordable and low income housing, but this advantage is not being made use of.

The building proposed would be almost 500 feet long, almost one tenth of a mile; that's a long way to drive underground to get out of a residential building. Traffic tension would be high.

The site is also just two blocks away from City Hall and the Shoreline Police Department, so here we have additional added concern for emergency vehicle response time.

The neighborhood would be disrupted from three years (!) of construction. This is another sign the proposed project is too big for the situation. Mill Creek proposes to stretch city code to it's absolute limit, to take out a substantial hill to make a pit for two levels of underground parking; this would disrupt use of Linden Ave N substantially.

Neighbors have contacted City of Shoreline Planning, Traffic Engineering, and City Council, only to be told that it appears the Mill Creek proposal should meet code and the expectation is it will be approved. We are calling on the city to ask Mill Creek for the needed changes mentioned above but it appears this will not happen.

I would hope Mill Creek Residential would follow safety suggestions and recommendations from your department. I believe this is an exceptional situation that calls for an exceptional response. The very least that could be provided would be an additional vehicle entrance. I, and other neighbors, would be grateful to know what you see as possible solutions.

Thank you so much for your time and consideration,

Derek Blackwell
derekindeed@hotmail.com

Attachments to Derek Blackwell's Email



**SHORELINE
CITY COUNCIL**

Will Hall
Mayor

Keith Scully
Deputy Mayor

Susan Chang

Betsy Robertson

Doris McConnell

Keith A. McGlashan

Chris Roberts

October 8, 2021

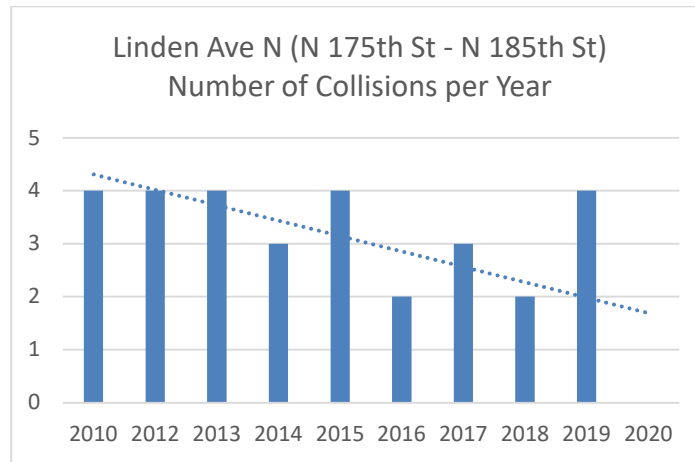
[REDACTED]
[REDACTED]
Shoreline WA 98133

Dear [REDACTED]:

Thank you for your September 29 email regarding speeding and traffic safety along Linden Avenue N in the vicinity of N 178th Street. The City Council appreciates you taking the time to write and have asked that I respond to you on their behalf.

In response to your observation on vehicle speeds, speed data was last collected in Spring of 2021 and showed an 85th percentile speed (the speed at which 85% of traffic is traveling at or below, a common traffic engineering benchmark) of 31 mph. About 5% of traffic accounts for what we call top end speeders; drivers traveling at 10 mph or more over the speed limit. Most top end speeding occurs between 3-6 PM. This data has been shared with Shoreline Police.

The City reviews traffic safety holistically and citywide through a process called the Annual Traffic Report. This process reviews all collision data in the City on an annual basis to determine strategic safety mitigation projects to address problem locations. This data-driven process helps to maximize the benefit from the very limited traffic safety resource available, by prioritizing locations with a consistent history of collisions first. While Linden Avenue N, from N 175th Street to N 185th Street, does experience about three collisions per year on average, it is significantly less than many other roadways in the City. Additionally, the collision trend for this segment is down, with zero collisions reported in 2020 as shown in the chart below.



For additional context, there have been no pedestrian or bicyclist collisions. There have been two reported injury collisions; however, this is still lower than other prioritized locations in the City. For these reasons, Linden Avenue N, between N 175th Street and N 185th Street, has not been prioritized for improvements. You can access the full traffic report at the link provided below – please note that reporting for the 2020 calendar year has not been published or discussed with City Council yet but is anticipated to be available before the end of the year.

<https://www.shorelinewa.gov/home/showpublisheddocument/49572/637378391275930000>

Some good news is that this segment is prioritized for sidewalk improvements which are conceptually slated for construction in 2025. You can read more about the 2018 Voter-Approved Sidewalk Program at: <https://www.shorelinewa.gov/government/departments/public-works/transportation-planning/sidewalks>

Regarding your specific question about speed humps, Linden Avenue N is an arterial and therefore is not eligible for physical traffic calming devices since it serves as an important connection for emergency vehicle response, trucks, buses, and relatively high volumes of traffic. The section north of N 185th Street is not classified as an arterial but rather as a local street and carries significantly lower volumes of traffic which is why speed humps were considered appropriate for that segment.

If you are interested in utilizing our radar speed feedback sign or would like to use some “drive like your kids live here” yard signs, please contact Darron Deranleau, Traffic Engineering Technician, at (206) 801-2433 or dderanleau@shorelinewa.gov.

Thankyou again for taking the time to write. If you have any additional questions, please feel free to contact Kendra Dedinsky, City Traffic Engineer, at (206) 801-2431 or via email at kdedinsky@shorelinewa.gov.

Sincerely,

Randy Witt
Director of Public Works

cc: Mayor and Councilmembers
Debbie Tarry, City Manager
Kendra Dedinsky, City Traffic Engineer
Darron Deranleau, Traffic Engineering Technician



SHORELINE CITY COUNCIL

Mayor Keith Scully
Deputy Mayor Betsy Robertson
Councilmember Doris McConnell
Councilmember Laura Mork
Councilmember Eben Pobe
Councilmember John Ramsdell
Councilmember Chris Roberts

April 11, 2022

[REDACTED]
[REDACTED]

Dear [REDACTED],

Thank you for your email regarding the proposed Modera development. Council appreciates you taking the time to write and have asked me to respond on their behalf.

The City of Shoreline's Planning and Community Development Department oversees the review of development permits of all kinds throughout Shoreline. As part of that review, staff determine if an application meets the requirements set out in the [Shoreline Municipal Code](#) (SMC). The [Development Code](#) (SMC Chapter 20) is adopted by Council and provides all the requirements that developers must meet in their projects. If a project meets the requirements addressed in the code, the permits are issued. Staff is unable to stop a development project or require changes to the project unless they are adopted as part of the Development Code.

If there are regulations you would like to see added or changed, the City currently accepts [Development Code amendments applications](#) year round. Applications are usually considered within 1-2 years of submission. The Planning Commission oversees the Development Code amendment process and then makes a recommendation to City Council on what they believe should be updated. Council is the final decision maker regarding changes to the Development Code.

We appreciate your interest in this project. As stated above, the City's role is to review the application materials and determine if they meet the requirements laid out in the City code, and if so, issue the required permits.

Thank you again for sharing your concerns. If you would like more information on the annual code update, please contact Steve Szafran, Sr. Planner, at (206) 801-2512 or sszafran@shorelinewa.gov.

Sincerely,

Rachael Markle
Planning and Community Development Director

cc: Mayor and Councilmembers
Debbie Tarry, City Manager
Andrew Bauer, Planning and Community Development Planning Manager
Steve Szafran, Planning and Community Development Sr. Planner