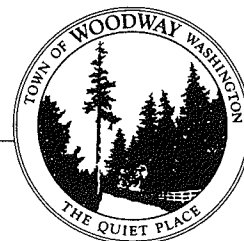


Town of Woodway



December 3, 2009

Ms. Michelle Linders Wagner, Chair
Shoreline Planning Commission
17500 Midvale Ave. North
Shoreline, WA 98133

RE: Testimony Related to the City of Shoreline's Proposed Pt. Wells Subarea Plan and
Pre-Annexation Zoning

Dear Chairperson Linders Wagner,

Thank you for forwarding the City of Shoreline's proposed plan and zoning district for Point Wells to the Town of Woodway for comments. We appreciate the leadership and cooperation your staff has extended to our own Town staff and elected officials. Since we are both neighbors to Pt. Wells, it is only natural that we collaborate.

Throughout all of our meetings on Pt. Wells, the Town has been steadfast in its position that the future annexation of Pt. Wells cannot be determined in the near future.

Therefore, our comments are intended to focus on the appropriateness of applying the proposed subarea plan policies and zoning regulations to future development at Point Wells regardless of the jurisdiction having regulatory authority. References in the following text that are attributed to the City of Shoreline are listed as "City" and those attributed to the Town of Woodway are listed as "Town".

Subarea Plan Comments:

The City's vision for Point Wells as an environmentally sustainable community is an admirable goal and wholeheartedly endorsed by the Town. Woodway has fashioned itself as an environmentally sustainable community with comprehensive plan policies that focus on the preservation of natural systems and implementing development regulations that include low impact development techniques and state-of-the-art critical area regulations. Future waterfront development at Point Wells should reflect the highest level of recognized environmental certifications for buildings, site planning and infrastructure systems.

Planning Policies:

The Woodway Comprehensive Plan (April 2004) included policy LUP-21 that recognized the development potential at Point Wells and recommended a series of alternative land use patterns for the waterfront. The alternatives ranged from the previous owners desire to continue the industrial uses (Alternative C) to more intensive mixed use

land use patterns that would better reflect future market conditions and development potential (Alternatives D, E and F). The mixed-use alternatives in the Woodway plan are generally consistent with the City's plan albeit the density for the residential uses reflects more of a suburban level rather than an urban level density that is proposed to be controlled by building height and parking ratios.

The Town appreciates the detail planning level work by the City to define the various geographic zones where building heights would be scaled to reflect adjacent view corridors from Shoreline neighborhoods. Although the City's consultant developed superimposed building images for several sites in Woodway, we believe that additional view corridors could be established in Woodway similar to the one established for Richmond Beach. Combining the view corridors of both Shoreline and Woodway would provide a more thorough site analysis for future building placement.

The Town supports plan policy PW-2. In supporting this proposed policy, the Town acknowledges that the jurisdiction having regulatory control over the shoreline area will need to include public access policies and regulations in the respective Shoreline Master Plan. The Point Wells shoreline is an asset to both communities and should be restored to its natural condition while enabling public access in appropriate shoreline areas.

With the understanding that the top of the bluff in Woodway ranges between 180' and 200' elevation, we suggest that PW-3 be modified to state that the top of buildings be no higher than 160' rather than stating that the buildings "should rise no higher than elevation of 200'. The Town's concern is the buildings that may be sited in the NW area should not extend beyond the height of the bluff that varies from north to south along the bluff edge. Maintaining a building height of 160', together with the creation of additional view corridors would afford Woodway residents more assurance of view protection.

Policy PW-4 recognizes that the buildable area east of the railroad tracks is outside of the Richmond Beach view corridor and suggests that building heights be limited to six stories. However, this area is *within* the view corridor of numerous Woodway properties and may be appropriate for lower building heights. Woodway plan policies LUP 22 and 23 recommend detailed site planning studies as a pre-requisite to establishing prescriptive controls to ensure compatible development with upland properties. Given that the existing residential properties in Woodway adjacent to the SE area range between 100' and 175' elevation, the Town suggests that detailed building mass studies be conducted in the area prior to establishing such a prescriptive height limit.

Policy PW-5 acknowledges that potential development intensity should be dispersed throughout the site by separating buildings with open space and view corridors and minimizing building footprints. The Town supports this approach and further suggests that the policy be modified to provide for both on-site and off-site view corridors.

As stated above, the Town suggests that additional view corridors be sited on the property to reflect not only the view corridors of Richmond Beach as stated in PW-6, but also those in Woodway.

The Transportation Corridor Study addressed in PW-7 and 8 is fully supported by the Town. In addition, at such time that a development is proposed at Point Wells and project-level environmental impact studies are conducted, the Town will demand more area-wide transportation analysis to ensure impacts to the Town's motorized and non-motorized transportation system are fully and completely mitigated.

The Town understands that PW-9 is intended to address development intensity through a performance based approach of limiting the number of vehicle trips generated from the proposed development. Although the Town recognizes this approach, it differs somewhat from the policy position of our Council, which is limiting the number of units to 800. The Town is of the opinion that 800 residential units, when combined with additional area devoted to office, retail and public uses, generally reflects a development intensity that could be compatible with the character of Woodway - if designed to the highest level of environmental certification.

The Town fully supports PW-10 related to the adoption of interlocal agreements to planning, development and governance related to Point Wells. The proposed policy is similar to adopted policies in the Woodway Comprehensive Plan which addresses working with surrounding jurisdictions and neighborhoods to collectively implement the land use plan for Point Wells.

Planned Area 1 Zone

The Town's review of the proposed zone district focuses only on the administrative sections of the code. We have chosen to only focus on the administrative sections since the comments related to plan policies can also be equally applied to the sections of the zoning code that address site and building standards as well as sustainability and shorelines.

While the Town endorses the concept of concurrently processing design review with other ministerial permits, we question the proposed administrative approval process. Development of the parcel to the uses and intensities envisioned in the plan will result in a substantial change to the existing character of the neighborhood and surrounding environs. Such changes will have a substantial impact on existing uses given that new lots and parcels will be created, along with new infrastructure and new buildings, of much greater mass than allowed in adjacent zones. Approving such a large project without a public hearing is highly questionable, if we are interpreting the proposed process correctly from 20.92.040.

A phased approach that first engages the public via an open recorded hearing and decision through a quasi judicial process regarding planned uses, site layout and public/private infrastructure system is suggested as a more prudent approach. Once a quasi judicial decision is made on the land division, site layout and infrastructure network, then administrative design and other ministerial permit review can expeditiously follow.

Thank you for the opportunity to comment on the City's proposal and we are committed to continue to share information and comments related to the important redevelopment of Point Wells.

Sincerely,

A handwritten signature in cursive script that reads "Carla Nichols". The signature is written in black ink and is positioned below the word "Sincerely,".

Carla Nichols, Mayor

CC: Eric Faison, Town Administrator
Town Council