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Submitted via email to: sbennett@ci.lake-forest-park.wa.us

January 31, 2019

RE: Town Center Plan DEIS

Dear Mr. Bennett,

Thank you for this opportunity to provide comments on the Town Center Plan DEIS, published January 2nd, 2019. We respectfully request that this letter be included in the public record.

Because of its unique lowland site at the very heart of our city, redevelopment of the Town Center is an environmentally significant project under any scenario. Potential impacts of proposed zoning and code changes deserve thorough, unbiased, meaningful evaluation. The Draft EIS falls far short of this standard. The DEIS is flawed and insufficient, and should not be used by the Council as the basis for decision-making.

The DEIS is fundamentally flawed in its depiction of Alternative 1 (No Action). The bookend starting point of “700 units” under Alternative 1 has not been adequately supported. As you know, every EIS is required to analyze a No Action Alternative, in addition to the range of alternatives presented for study. Analysis of the No Action Alternative is used to establish a baseline upon which to compare the proposed “Action” alternatives. From the EIS Scoping Notice Summary (Oct 2018): “...*The purpose of the EIS will be to analyze a reasonable range of alternatives representing the proposed action...*” If you begin with an incorrect assumption in the “No Action Alternative,” no reasonable and justifiable comparison can be made to the other alternatives. Perhaps a truer “No Action” Alternative would be to use the as-is current built environment that exists on the site today, rather than some questionable number of future housing units that *could* be built under current code?

The 2004 Town Center Study (“Sustaining a Livable Lake Forest Park: The Future of Town Center”) endorsed redevelopment of Town Center including between 200 and 270 units (pg. 19). For Alternative 1, the DEIS states (Ch.2, pg. 5) “...*analysis in this EIS section is the quantity of 700 dwelling units... which was an actual proposal from nearly ten years ago that did not move forward due to the economic recession.*” A proposal by whom? Was it ever evaluated as feasible? Was it deemed a complete

application, if so when and through what process? Is this proposal publically available? Why does a decade-old development proposal supersede years of public process, and other City published goals and policies?

Alternative 1's 700 units exceed even the housing targets *for all of LFP* under the Growth Management Act (the City's 2035 growth target = 551 housing units, adopted by Council in 2016). This GMA target has already been met by new developments within the Southern Gateway, so why is our City pressing for such high density residential development at the Town Center? The only mention of similar housing numbers we could find in the public record are from Merlone Geier's comments on the EIS scoping, suggesting, "*Alternative 2: The City should study the environmental impacts of at least 1,100 dwelling units at heights up to 75'*," and, "*Alternative 3: The City should study the environmental impacts of residential densities that would allow up to 1,500 dwelling units at heights up to 85 feet.*" Is this where the City's Alternatives came from – the developer?

The scale (sheer size) and number of buildings needed to meet these proposed housing numbers raises red flags. These density targets (700-1500 units) leave very little room for public open space or amenities such as playgrounds or for large trees or riparian zone improvements for Lyon Creek. New residents will also require adequate green space and mention of potential new open space requirements in the DEIS are vague at best. This DEIS also does not adequately address the environmental impacts of adding so many large buildings on that site, and the proposed density is simply out of character for a town the size of Lake Forest Park.

Assuming, arguendo, that the DEIS Alternatives are reasonable, the DEIS is lacking in adequate studies and analysis of potential environmental impacts, including: traffic, noise, air quality, tree canopy loss, heat island effect, geotechnical analysis, groundwater, surface water management, impacts on health of our streams and lake, and endangered salmon.

The DEIS fails to adequately address impacts to threatened or endangered species. Lyon Creek, which flows through the Town Center property, is potentially home to three federally listed species of salmonids (Chinook salmon, bull trout, and steelhead) and one salmonid species of concern (Coho salmon). In particular, Coho salmon are known to spawn and rear in the creek. High density development could harm stream functions and salmon populations in several ways.

Just a few years ago, the City wisely saw beyond the built solution of a bypass pipe, and completed the Lyon Creek Flood Mitigation (LCFM) project. LCFM is an award winning example of a 21st-century green infrastructure project which created a wetland at Whispering Willow Park and improved the riparian corridor as a natural solution to flooding. It is still a work in progress, as ongoing stream monitoring is needed to determine if there is adequate shading and water flow for fish in the channel, especially as it flows through the Town Center. We cannot allow development to disrupt these hard-won stream improvements. New research shows that urban stormwater runoff, which flows into waterways when it rains, can kill Coho salmon within one hour of exposure (Urban Runoff Mortality Syndrome, UW Tacoma, WSU & NOAA, December 2018). Stormwater from roadways and parking lots is a cocktail of toxicants and is a major threat to salmon throughout Puget Sound (Roads to Ruin, Ecol. Appl. 27_8, Feist B., 2017). In particular, chemicals leaching from worn bits of tires are lethal to fish. Increased vehicle trips translate to higher levels of toxic salmon-killing runoff.

The DEIS does not address this very serious potential impact to salmon. Protection and continued habitat improvement of Lyon Creek must be central to any development scenario under consideration. This includes use of bioswales or similar natural stormwater retention plantings, more large trees not less, and public park/open space and wildlife habitat along the stream corridor.

The DEIS fails to adequately address impacts to groundwater and soils. The DEIS makes very minimal reference to the fact that the Town Center site was historically a wetland, and that it currently has a very shallow groundwater table. Shallow groundwater will have a significant impact on what kind of construction would be feasible on the site, building size and underground parking (DEIS, Chap. 2 page 9; Chap. 2 page 14). Apparently, previous Town Center proposals concluded that the Town Center soils might not support high rise buildings, or underground parking. King County has identified the Town Center site as an area of moderate-high liquefaction concern (King County Flood Control District, Map 11-5). This is not adequately addressed in the DEIS.

The DEIS fails to support protection and improvement of tree canopy, a tenant so central to the unique character of our City, in fact it is our middle name. The citizens, City staff and Council have spent innumerable hours over the last ten years evaluating and updating our tree ordinances in recognition of the many values trees provide. Why do the DEIS Alternatives fail to portray this core value of our community? The densities and development scenarios being evaluated simply do not allow for sufficient large trees within the Town Center. Current condition (lack of canopy) is not an excuse to allow so few trees in future development. Large trees provide shade, screen cars, reduce noise and can improve air quality. Studies have shown that presence of trees has a positive effect on the value of neighboring properties – therefore allowing development without trees will negatively impact the property values of nearby single-family homes.

The DEIS fails to address the negative macro- and micro-climate impacts of the “heat island effect” created by large expanses of pavement and hardscape. Heat has direct effects on human health and the broader environment. Large trees and green roofs can help reduce urban heat island effects. Large trees, curbside plantings, and green roofs can lessen the impacts of the heat island effect. Plants on the roof are excellent insulators during summer, and cool the surrounding environments including outdoor spaces. Furthermore, air quality is improved as plants absorb carbon dioxide and produce fresh air (Smart Growth and Heat Islands, US EPA).

The DEIS fails to adequately address the traffic impacts related to adding 700-1500 housing units at the Town Center. See above listed impacts to water quality and salmon mortality, but also other related impacts including air and noise pollution from increased population and traffic have not been adequately addressed. Traffic analyses, for example, concentrate on delays at surrounding stoplights, but do not adequately address the increased probability of neighborhood cut-throughs and traffic back-ups along surrounding roads.

The DEIS Alternatives do not align with long-held, deeply-ingrained community values.

So much time and energy (and public dollars) have gone into this process. Yet again, the City seems to forget its own prior governing documents. The Legacy 100-Year Vision (2008) outlines strategies to manage growth, preserve natural resources, and strengthen the relationship between the City’s natural and built environments.

The overarching goals in the 100-Year Vision include:

- *Improve stream and lake water quality and restore natural hydrologic functions*
- *Promote and develop diverse gathering places for our community*

From the Introduction to the Draft EIS: “*The purpose of the plan is to guide redevelopment of a vibrant, attractive, transit- and pedestrian-oriented Town Center, **consistent with the community’s vision**,*”

From the Town Center VISION report: “... ***The sense of green at Town Center should be greatly increased and expanded over the current condition, adding trees, landscaped areas, green common areas, and other features so that Town Center is more green than gray.***”

We argue that none of the Alternatives truly “align closely” with community perspectives. A letter provided for the record from five Vision Task Force members clearly lists the divergence of the DEIS from specific goals and policies in the Vision, thus we will not reiterate them all here (*Town Center DEIS Comment Letter From Vision Task Force* dated January 24, 2019).

It has been scientifically demonstrated that access to nature has a significant positive impact to human well-being. A broad and diverse body of scientific literature describes the human health value of nature, confirming that trees, parks, gardens, and other natural settings are as essential to livable and sustainable cities as the other critical systems that keep their residents moving and working (Urban Nature for Health & Wellbeing, USDA, February 2018).

Our small town is squeezed on all sides by population pressures. We do not have the benefit of more open land to create more public parks. Even with the new parks created in the last two years, LFP still has less park land than any surrounding city. Future development at the Town Center should address this need by adding public open space that is not just streets or sidewalks. An additional 700-4000 residents, as would be expected via the outlined development alternatives, will need access to green and open spaces as well. The DEIS does not address where these spaces will be.

Nature can be integrated with streets, buildings and entire developments to manage water quality and quantity. Biophilic or ecologically-based design is an innovative new way of designing the places where we live, work, and learn. We need nature in a deep and fundamental fashion, but we have often designed our cities and suburbs in ways that both degrade the environment and alienate us from nature. Nature in our daily lives enhances the social ties among neighbors by encouraging use of common spaces. The concept of “more green than gray” goes beyond environmental benefits into the realm of promoting societal cohesion, human health and well-being.

The Town Center is truly the heart of our city, we must take actions today that will keep that heart healthy. When green infrastructure is designed to include compelling natural spaces, nature and people both benefit. This sort of forward-thinking design guidance should shine through the EIS Alternatives as a proud proclamation of our city’s environmental ethos.

Guiding principles of ecologically-based design include:

- Vegetation is a meaningful part of the experience, not just a decorative add-on.

- Bioswales/ bio retention such as rain gardens, using mixed species native plantings that supports wildlife, including birds and insects.
- Permeable Paving.
- Depaving (reduction/removal of paved areas).
- Green Roofs.
- Outdoor spaces should be a reasonable temperature, based on a balance of sun and shade.

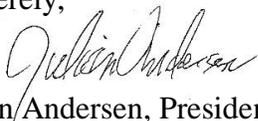
Tall “monolithic” buildings such as in DEIS Alternatives 2 & 3 create “concrete canyons” and will not meet stated goals of “Enhancing a walkable retail experience.” Research shows that street-level natural forms and large trees create a healthier and more enjoyable pedestrian experience as compared to linear plantings, and that pedestrian-oriented retail areas with attractive natural features experience higher foot traffic and even increased retail rents. Quality of life factors are important attributes that can draw businesses to an area. Protecting and enhancing the natural environment is an economic positive incentive for the developer that the DEIS fails to weigh in any of the alternatives. These arguments for less-dense, more nature and pedestrian-friendly community-scaled development, must be considered.

Moreover, we feel there is a false sense of urgency for these code changes. What is the basis for the City’s accelerated pace to revise its entire code framework for the Town Center site? This rushed timeline has caused the Council to skip important procedures such as allowing sufficient time for DEIS review and recommendations by the Planning Commission, and more time to receive and fully respond to public input. Sound Transit staff recently confirmed the site of the 522 corridor garage has not been selected, it is not definitively to be built at the Town Center. At the Council of the Whole meeting just a few days ago, the City announced that Sound Transit will not even seek permitting for the project until 2023 or 2024. Therefore, even ST3 garage design code changes are not as urgent as has been portrayed. There is no current redevelopment proposal brought forth by the Town Center’s primary landowner Merlone Geier. From the DEIS: *“Merlone Geier Partners (MGP) ... has plans to redevelop areas of the site in phases over the next 15 to 20 years.”* We ask, what then is driving the Council to act on this accelerated timeline?

The City has a critical role in guiding future development of the Town Center through ordinances, incentives, impact fees, and creative ecologically-minded planning. The City also has the duty to act in the best interests of its citizens, and that means listening and responding to citizen input and adhering to the City’s stated goals and policies.

The Board of Directors of the Stewardship Foundation strongly urges the City of LFP to request a substantive rewrite of this DEIS and an extended time frame for its consideration. Before proceeding with any proposed code changes, the City must carefully consider guarantees for creation of essential Vision elements of environmental value and community benefit, impacts both on and off site and their mitigation, and outline a new and realistic description of the “No Action Alternative.”

Sincerely,



Julian Andersen, President

cc: Mayor Jeff Johnson and City Council