

CHRONOLOGICAL COMMENTS RECEIVED ON THE LAKE FOREST PARK TOWN CENTER PLAN DRAFT ENVIRONMENTAL IMPACT STATEMENT

MARCH 4, 2019

Please note: Comments from the January 16, 2019 Public Hearing are still being transcribed and will be published soon.

From: Robert Wagar [mailto:tsc_bob@hotmail.com]
Sent: Thursday, January 03, 2019 11:46 AM
To: Stephen Bennett <SBennett@ci.lake-forest-park.wa.us>
Subject: Town City DEIS

Just started looking at DEIS. Couple of minor comments.

Page 7 (Introduction) at the at the (deleted one of the at the. Town Center is located on the southwest corner of intersection of SR 104 and SR 522, not the northwest.

Expect after looking at all pages within the DEIS I will likely have some addiitonal comments.

Bob Wagar

From: Aron Golden [<mailto:arongolden@uwalumni.com>]
Sent: Monday, January 07, 2019 11:42 AM
To: Stephen Bennett <SBennett@ci.lake-forest-park.wa.us>
Subject: Town Center DEIS comments

Hi Steve,

Congratulations on the DEIS! I am so excited to see changes at the Town Center and hope this initiative continues without an economic downturn or community opposition. I have a question and a comment:

What is the purpose of have options 2 and 3? Wouldn't option 3 allow varying heights of buildings if an Applicant desired? And which option is preferred by the current property owner?

Please note the schools section is incorrect. It excludes Brookside Elementary, which is also the school serving the Town Center property.

Thank you in advance and I hope you are doing well.

Aron

From: Peter Eglick
Sent: Monday, January 7, 2019 1:49 PM
To: 'SBennett@ci.lake-forest-park.wa.us'; 'sbennett@ci.lake-forest-park.wa.us'
Subject: RE: Town Center DEIS

Greetings Steve

As a resident of LFP nearby to Town Center where I often can be found, a quick look at the Town Center DEIS raised a couple of questions: 1. Is there no specific mention in the DEIS of what numerical **Type** (as that term of art is used in the LFPMC) of decision the City will be making based on the Town Center EIS? 2. There also seems to be no mention of the path for appeal of the adequacy EIS once the decision **TYPE** is established. Can you please enlighten on these points ?

Thank you,



Peter J. Eglick
Eglick & Whited PLLC
EWLAW.NET
Phone: 206-441-1069
Address: Suite 3130, 1000 Second Avenue, Seattle, WA 98104

January 13, 2019 10:47 PM
Researching ... (year: 2005 to year: 2019) where did 700 Residential Units come from?

Stephen,
I was looking through my meeting notes from 2005, the Design Framework Guidelines from 2006, the Planning Meeting notes, and I don't see where or how 700 units was calculated. But, that's what is proposed in the DEIS – Alternative 1, No Action, (700 residential units). Can you help me understand where that number came from? If there is someone else I should ask, please feel free to redirect me to the right person.

Followed by this reply on January 14, 2019:

Thank you Steve! Yes, please include my question as a formal comment. Maybe this could be addressed at some point for the general public to better understand.

Hope you are doing well. I'm sure you are getting a lot of email and I appreciate you getting back to me.

Thank you,
Shary Van

Received January 13, 2019

Town Center Redevelopment

To Planning Director Steve Bennett:

I have heard that the council is leaning towards DEIS Alternative 3 (Uniform form and height) for the Town Center.

This option would not guarantee public open space or amenities. It would put a strain on infrastructure, create traffic congestion, and have negative environmental impacts, such as no or little trees or green spaces. This plan has no requirements or incentives for green building.

This runs counter to the majority of comments by citizens of LFP. We have been promised transparency and public input through the process of the redesign.

We need a town center that reflects the needs and spirit of LFP.

Cordially,
Maris Abelson, Lake Forest Park

Received January 13, 2019

Re: development

This is a copy of the email sent to the council

I am writing to you let you know that I am strongly against any aggressive redevelopment/code changes of the town center. I am a 25 year resident of LFP and baring any extreme changes in the community and major re-development I plan to remain in LFP. Never before have we experienced a Council so at odds with the people who elected them than we are currently. It is my observation that the council is not taking into account many of the impacts the proposed redevelopment will have. The eye of the council seems to be on expected revenue and desires of the county and ST3. I have been to numerous meetings, received many; many phone calls and emails from citizens. Not one of the contacts has said they would like to see the extreme change the council is proposing. I have encouraged all to contact all of you and to attend the hearings and meetings. The council should and must consider the following prior to proceeding further.

-What will LFP's quality of life be like after the proposed densification?

-The impact:

Local schools (currently over crowded)

Police

Fire department

Street traffic

Parking

Environmental pollution

Traffic but to name only a few.

-Also since we are in earthquake territory and so near Lake Washington, Seattle Liquefaction, mangomap.com should also be consulted.

I implore all of you to stop this path you are on and to consider the wants of your constituents. A major redevelopment will devastate this town and change forever the quality of life, not for the better.

The council has spent a great deal of money for the second time to draft plans for property it does not own. Money ill spent. Changing codes to appease a developer is a slap in the face to everyone who resides in this town. –

Cheryl Brady

Received January 13, 2019

Public Hearing for LFP Town Center Draft Environmental Impact Statement (DEIS)

Dear Mr. Bennett,

The city website lists you as the person to submit comments about the proposed Town Center development and a hearing on January 16th.

Higher density allows feasible public transit. Having only single family homes and frequent bus service is incompatible without large subsidies or taxation.

I recommend that the 7 story proposed height be allowed for all property in Lake Forest Park and not just the proposed development. If homeowners want to create or maintain a certain neighborhood appearance, they can create a homeowner's association and gated community (with the option of placing a gate or not placing a gate). I also recommend that the project be allowed with the following stipulation; that part of the development requirements include that the developer make a good faith effort to ask the state Department of Transportation to convert the bus lane on Bothell Way to a HOV lane, even if a interim or test period.

Sincerely,
Derek Saun

Received January 13, 2019

[Towne Center](#)

I've been a resident of Lake Forest Park for almost 20 years. I live about 3 blocks from the town center on NE 178th. From a few windows of our house, we can see the Ross sign through the trees (we hate that we can as its obnoxious). We have seen traffic increase terribly in the time we've been here to now being used to seeing cars back up Ballinger. Its disappointing and feels like we're being overrun by traffic.

I shocked to see plans that could entail a 7 or 8 story building be built at the town center. This would be an absolute disaster for our neighborhood - increasing noise, congestion and more people. Please please do not change the zoning. We will already experience a radical change in our neighborhood as it is with the new transit center and 700 people living here. We do not need or want a 7 or 8 story building in our neighborhood.

Please support Options 2 or 3. Option 1 isn't great - I would prefer a much smaller residential facility (3 stories max) but its the lesser of three evils. Please maintain our neighborhood and do not approve Options 2 or 3. I would also like to add we want side walks and safer pedestrian overpasses and cross

walks across Bothell Way and Ballinger. Right now, trying to cross either is taking your life into your hands.

Please call me if you have any questions.

Eliza Kelly

Received January 13, 2019

Comments on Town Center redevelopment DEIS

The following are my comments on the draft environmental impact statement for Town Center redevelopment but I'm also just generally addressing the Mayor and City Council about development here.

Let me first just say the overall trajectory of needing an automatic preference for moneyed interests at the expense of the environment in LFP is troubling. Troubling enough that I am having a hard time supporting our current leadership. I also have a hard time understanding why it is necessary to pass resolutions in semi-secret, rushed, or without a quorum. All of which has happened in the past two years and it usually looks like it's to encourage development.

I live in an area where trees have been entirely clear cut for a higher density housing development-- where expensive 2000+ sq ft houses have a 2500 sqft lot (or less). The developer replaced the trees he cut with measly shrubs and grasses. This type of development is not good for LFP. If we want to create strip malls and bull doze trees we can live in Mountlake Terrace or Mill Creek or Bothell.

I chose to live in LFP because the founding documents explicitly favor this area as community friendly to ecology. I didn't come to LFP to have better malls and 85 ft high rises. I understand the need for more available higher density housing but I believe we need more evaluation of environmental impact as well as better considerations for open space. Lyon Creek is still supposed to be a Salmon stream. As we all know, wild salmon and Orca are in a symbiont relationship that we need to start preserving today, not plow over with more greed and development and "externalize" the consequences for tomorrow.

With respect to the DEIS--I *strongly* prefer Alternative 1. We do not need 85 ft buildings in LFP. We also don't need further deregulation to favor lazy developers. We can be more creative than that.

Thanks,
Craig Foster

Received January 13, 2019

My opinion on height changes

Dear Steve

Thank you for your notification. Please be advised that I am for alternative 1 - keeping the existing height regulations, with no changes. I would like to keep LFP a special community, similar to Edmonds, small with a special, unique identity all it's own. We do not have the

infrastructure to support major developments nor should we look to expand beyond what will destroy our identity.

Regards

Richard Nakamoto

January 13, 2019

Town Center Redevelopment

Hello LFP City Council,

I spent some time today reading the 215 page draft environmental impact statement for the town center redevelopment. I found it very interesting. The photos, models, 3D sketches, and text all did a good job of helping me understand the proposals. After reading the statement I felt like it was just another development that could happen anywhere in the USA. More retail space and high density housing all of which are rented and not owned by businesses or families. Selecting the proposal I liked best felt like picking from three bad choices. It was clear what the book ends are and no one wants those.

What was really lacking for me was a connection with the forest, streams, and lake.

In my mind the city council faces two challenges. First, how do you protect the unique character of Lake Forest Park while growing the city and making it more sustainable. Second, how do we plan for a future that is unlikely to be like the past.

I actually think the second part is easier than the first. Transportation, retail, food, and the environment are all changing and we should have our 30 year plan aimed at interesting with the future.

Transportation: We know about ST3, but, what about the rise of ride-sharing, deckles personal transportation, and micro-rentals.

Retail: Nearly every type of retail has been radically changed by Walmart and Amazon. Grocery stores are next with Kroger & Microsoft working together and of course Amazon.

Food: People are eating better quality of food and lower quantity. The number of seats at an average restaurant is going to go down.

Environment: This will impact Transportation, Retail, and Food. People care more and more about how far their products are traveling and where their food is grown. People are also more aware of where their power, water, and energy (electric, gas) are coming from. They are also more aware of where their waste (human, gray water, surface water, trash, etc.) are going.

This proposed plan does not consider these coming changes. This plan is a cookie cutter development plan driven by developers to increase rental income per acre and drive the human experience to be based on human built structures rather than the environment around them.

You should ask your self if one was to drop you in the middle of this development in 40 years would you know you were in LFP, or could you be in any number of cities in Western Washington and the country.

Also, if you were to live in one of these rental units would you feel like you were part of the forest part of LFP or would you be in just another rental.

We need to be more bold.

- 1) Integrate the development with the surrounding community. Currently it is basically a walled development. Break up the west edge to integrate with the residential area.
- 2) Integrate with the Lyon Creek by creating some green space on the banks of the creek.
- 3) Create easy pedestrian access to the trail and lake with an over or under pass.
- 4) Bring in some tall pines to the development not just little city-trees.
- 5) Plan for zero carbon / zero emissions / and zero waste from the start.

Regards,
Eric Blom

Received January 13, 2019

Redevelopment

I am against the plan. Anything that would interfere with the atmosphere of the third place would be a crime. I do not want to be a Bothell clone.

But I guess that would mean I could put a 4 house development on my 30,000sq ft property and move to Sequim. You will be chasing the families that have grown up with the town center mall out. Is that what you want?

Lori Silverstein

Received January 14, 2019

[Town Center redevelopment](#)

NOOOOOO!! If we have to have a residential apartment building, please let it be the smallest option. DO NOT eliminate (or stuff them on top of the parking structure) Albertsons/Papa Murphy/RiteAid//3rd

Place Commons. These are the heart of the Center, and without them there is no incentive to go to the Center (or what is left of it). Don't we have enough trouble with the widening of 522 and the impact on us living on it, without killing the Center also? Have a little pity.

Barbara Buringa

Received January 14, 2019

[Town Center Redevelopment](#)

Dear Sir, we have lived in LFP for 20 years and are active and involved citizens. We understand that you are considering alternative 3 in developing the Town Center. I can tell you that we are absolutely against this option. We do not want to look like Ballard, nor do we want the crowds, transportation issues, expense, danger to our children, and lack of environmental quality that comes with this type of high density housing. Lake Forest Park has no place for 6-8 story buildings. Part of the attraction is the environmental quality here, including the community feeling and family friendly space. Not everything should be about money. We see this as a money grab for the big developers with no benefit to the citizens who live and contribute here every day. No to high density development in LFP!

Cathy and Brian Harber, 4024 NE 204Th Street, LFP

Received January 14, 2019

[Comment on Deis](#)

I have lived in LFP since I was 9 years old and that was before the "Center" was built. I have read the DEIS and have two comments. First, the report is quite impressive and comprehensive. Second, the third option is the best choice. My biggest fear is that the folks for "no change" will rule the day. They seem to fear "looking like every other town center" and any housing. I think the current situation is an eyesore and we need to move into the 21st century and recognize the value of a place bringing people together and providing for those needing housing.

Karen Connell

Received January 14, 2019

[DEIS Comments\(from Jean Robbins\)](#)

As a LFP Stewardship vice president and member of the mayor's Vision task force, these are some preliminary comments. More detail and organization will follow at a later date::

1.I am appalled and dismayed that Alt 3 is even being considered given the feedback from the community. Alt 2 doesn't look that good either to me at this point. Why were these housing unit numbers not shared with the Task Force? I feel deceived.

From statements in the DRAFT VISION document, april 2018 where are:

-preserving and creating connections to nature

- **Lyon creek as a destination creek where people can walk along and look at at the creek.** These alternatives and their setbacks only seem to impede the homes on the creek side of the center. They will lose their sunlight which cuts their connection with nature and environment a great deal.

-Make the Center more GREEN than Grey. Not adressed well at all in these options. If this is meant to be added you have scared me.

-Traffic needs flow in and out of the Center efficiently. Where is a better setting for the fire station which is already concerned about efficient in flow and out flow on Bothell Way.?

-where are the easy and safe flow of traffic throughout he towncenter. The lower lot by Albertsons is still a pit of cars with no improvement in pedestrian safety or enticement to walk between stores. Where is there separation between pedestrians and cars?

-retain and expand the library. (my personal thought is to bring the library out to the current parking lot with safe walkways to and from that can connect all citizens to it and the the other buildings at the center. A day care or family friendly venue like Swirl in that complex (library +family friendly business would compliment the community well)

-spending three hours with my family there.Go to previous comment re library and family friendly business and safe walkways.

-Lake Forest Park is named for a reason; this character should shine through.Where are more trees as a prominent experience as on enters the center?

-Create a village like character that is in scale with and complements the surrounding neighborhood. Putting all development on the upper level creates a two part community which is not a community.

I have so much more to say but this will do for now.

Respectfully,
Jean Robbins

Ms. Robbins also sent this email correspondence on January 25, 2019:

DEIS

Dear Friends and neighbors,

Before making conclusions for the Town Center please view the video from the Public Hearing.VISION document. I was a member of the Mayors Task Force and frankly, We feel deceived by the plans that supposedly come from this vision; the voices of the city.

Before you conclude seniors want to age in place, do a study to see if really our seniors want to live in small apartments with in a massive housing development of 1500. I'm sure a few do but a survey on my block does not agree.

Also regarding the diversity issue. This is nice ,but has a study been done to see how people feel if the trade off is a 1500 unit housing complex?

The city of Seattle has exempted neighborhoods like Queen Ann and crown Hill from their zoning for greater density. Why not Lake Forest Park?

Do not be the council who KILLS Lake FOREST Park.

WE have already increased housing at Southen Gateway and most think it's development is ugly, depressing and another example of citizen input being tossed down the drain..

Do not deceive the people who make up the heart of LFP. This not what they expected when they gave you input in community meetings.

There are rumblings about legal action.
There are rumblings about dump this council in next election.

ABSOLUTELY NO ON 1500.

Respectfully, Jean Robbins
Mayors VISION Task force
Stewardship Foundation, Vice President

Received January 14, 2019

TC DEIS

Steve,

This is my first comment regarding the Town Center Draft Environmental Impact Statement.

The DEIS is a failure. It is a biased document that presents the community with of a false choice of development scenarios.

Town Center plan grossly inflates allowed development

The Town Center Draft Environmental Impact Statement proposes three development scenarios, supposedly to “bookend” possibilities. The first “no action” alternative is stated to represent what will happen if no changes are made to existing city code and finds that 700 (or more) dwelling units are likely. This scenario ignores the actual city code.

LFPCM 18.42.040 states:

“Residential uses may not be developed at a density of greater than seven dwelling units per acre”
For a site of roughly 17 acres, that’s 120 units

So how does the city arrive at a number of 700 units, nearly 6 times greater than city code allows? It uses an alternative process, the Town Center Design Guidelines, which does allow greater density but couples it with considerable safeguards to ensure the creation of public amenities. Our Planning Director recently described at a planning commission meeting this process as – so complex that it disincentives development. Said another way, no developer will use this process because they know developments of this scale will not survive public scrutiny and receive the required approvals. The city failed in two ways: 1) this aggressive redevelopment is not a lower bookend and 2) it would require significant action to be approved.

Our community has widely varying opinions on how to enhance Town Center. Making decisions about its future are not easy. Regardless of the scale of redevelopment we might favor, I think we can all agree that reaching consensus as a community requires the city present an accurate and unbiased range of possibilities. The Draft Environmental Impact Statement does not meet this criteria. Independent of my personal preference on the scale of development, I believe it is irresponsible for the city to imply that we are locked into a minimum of 700 units.

I would have addressed this issue head-on much sooner, but the estimates of units were not shared with me for months despite my repeated requested. Further, my view that the current allowed ~120 units was expressed to you (and the consultant) in an email on Oct. 12, 2018, which was not responded to.

T.J. Fudge

Received January 14, 2019

[Town Center DEIS comment](#)

As a LFP resident and homeowner of 42 years, I favor Alternative 1 - No Action. The alternatives 2 and 3 would allow density out of scale, insufficient open space, and failure to support the historical record of why LFP was incorporated in the first place. Only Alternative 1 is consistent with the values favored by a majority of the LFP residents.

Jim Liming

Received January 14, 2019

Please Preserve Single Family Homes

Hi,

Moved here for quiet and beauty not multiplexes.

Thanks,

Kathy Fellstrom

Received January 14, 2019

Our public comment on Town Center development plans

Dear Mr. Bennett,

We have reviewed the plans for the Town Center Development and feel very strongly that NO changes in zoning or configuration of the Town Center be adopted. All proposed options threaten retail and destroy the Commons as an accessible and vital component of our community.

Even under Option #1 traffic issues associated with the new garage will have negative impact on the quality of life in LFP. Since the toll was placed on the 520 Bridge, traffic through LFP on both Ballinger and Bothell way has already become a big problem. Already cars are speeding through our quiet neighborhoods trying to avoid the congestion on the arterials. Adding density to the Town Center will only make matters worse. We feel strongly that these plans are taking LFP in the wrong direction. Preserving the character and functionality of the Town Center will sustain the desirability of living in our community.

Options 2 and 3 will essentially remove all benefit from living in LFP. It will have negative environmental impacts, will make traffic untenable, and will eliminate our core retail. Over the last 15 years The Center has become a lively place with businesses I depend on everyday. Without the town center we will have to drive to Shoreline or Lake City to take care of all our essential errands - creating even more traffic issues! The bookstore, especially, is a destination retailer for people from the entire 522 corridor. Putting the Commons in a parking garage will kill the concept and fail. Our quality of life in LFP depends on preserving the beauty and functionality and our basic retail core.

Overall, we don't understand what problems any of the proposed options are solving for our city. All will create more traffic problems, threaten or eliminate business that the community has come to depend on and value, and reduce quality of life for the surrounding community. We feel strongly that the council needs to articulate its goals for the proposed actions, given the clear negative impacts on our community.

Many of us will feel compelled to leave the community if the council goes forward with its proposed plans.

Best,
Scott and Ellen Ramsey

Received January 14, 2019

Town center vision comment

Hello! Today I learned that the plan for the Town Center development direction may be heading toward Alternative 3.

I'm all for mixed use development but this option seems heavily weighted in favor of the developer rather than LFP residents. It frankly feels like a public housing project or military barracks where the goal is to pack as many residents into one space as possible without regard to useful open areas outside the buildings. My preference would be Alternative 1 or even 2, which provide mixed use along with some open space. I hope the city strongly considers one of the first 2 options.

Thanks for your time,
Lorie Ransom

Received January 14, 2019

Town Center Plan

Steve, this is absolute insanity! The name of our town is Lake FOREST Park as in forest of trees not forest of buildings. This would totally destroy its unique character which is quiet, sylvan, single family residential and turn it into downtown Bothell. The devastating impact on Ballinger Way traffic alone should eliminate this plan from consideration entirely.

Thanks for considering my view.

Peter Renhard

Received January 14, 2019

LFP Towne Center redevelopment support

Mr. Bennett,

I've lived in LFP for 30 years. I am supportive of redeveloping the towne center. Of the 3 alternatives I think spatially #2 is most efficient-makes good use of the space. It also has more of a town center feel and seems less like a big parking lot. I expect the center would be similar to Redmond Towne Center so could have more than ground level which would maximize use of the space.

Diane Timberlake

Received January 14, 2019

Town Center development

HI Steve,

As 15 year residents of Lake Forest Park we have endured many changes to our community. All along the way we have reminded ourselves that these changes, that impact our day to day life, will have a positive impact on others in surrounding communities. The changes that have been outlined for the Town Center don't seem to do much to enhance the quality of life for the citizens of this community, this feels like it is about someone else maximizing their profit.

People need a place to live, we get it. However, the expectations of those that live in this community is that our elected officials will fight to help preserve our community and the values it has been built upon. Any consideration to expand the scope of this residential complex beyond the existing LFPMC is an attack on our quality of life, and a simple acknowledgment by the decision makers in our town that enhancing the bank accounts of MGP and it's developers is the priority.

Steve, please tell me we are better than this. I'm asking you to fight for us, and help protect what we as citizens of this community have built for our families.

Regards,

Drew & Vanessa Whorley

Received January 15, 2019

letter of support for option 3

I think you're the right person for this, if not feel free to forward. I support the highest density housing plan for the LFP Town Center. Density is the opposite of sprawl.

Yours,

Ken Berkun

Received January 15, 2019

Town Center DEIS Comments

We have read the DEIS and attended some of the meetings/workshops on this topic. Unlike our larger neighbor to the south where people seem to believe there should be virtually no limit to housing density, people live here, in this city, to enjoy our high quality of life. We believe in environmental protection, trees, parks, and open space. We want to protect salmon and see their return in large numbers to our streams and forests. We don't want or need to be like Seattle if being that way will destroy the character of our town, destroy our quality of life, and damage our fragile ecosystems.

Nothing in this DEIS has convinced me that Alternatives 2 or 3 would be better for the residents of this city. We do need more parking at the Town Center and we need an improved transit infrastructure. It is becoming very difficult to drive to Seattle due to traffic congestion and we should do our part to reduce this congestion. However, neither of these needs requires a huge upzoning of the area. Upzoning itself will not help reduce traffic congestion, improve environmental quality, or bring salmon back to Lyons Creek. Quite on the contrary Alternatives 2 and 3 may increase local traffic congestion, damage the environment, and make it more difficult to restore our salmon runs.

No amenities are promised in return for increase zoning. We will house more people but it will cost us in loss of our town's character and may result in loss of our resolve to improve, not degrade, the environment.

I strongly urge you to support and approve Alternative 1. It's the sensible alternative for our community and for the core values of our citizens.

Thank you.

Dave Haddock
Diane Haddock
17012 35th Ave NE
Lake Forest Park, WA 98155

Received January 15, 2019

From: Eric Blom [<mailto:ericb@piap.com>]
Sent: Sunday, January 13, 2019 3:00 PM
To: City Council <citycouncil@ci.lake-forest-park.wa.us>
Cc: Jeff Johnson <jjohnson@ci.lake-forest-park.wa.us>
Subject: Town Center Redevelopment

Hello LFP City Council,

I spent some time today reading the 215 page draft environmental impact statement for the town center redevelopment. I found it very interesting. The photos, models, 3D sketches, and text all did a good job of helping me understand the proposals. After reading the statement I felt like it was just another development that could happen anywhere in the USA. More retail space and high density housing all of which are rented and not owned by businesses or families. Selecting the proposal I liked best felt like picking from three bad choices. It was clear what the book ends are and no one wants those.

What was really lacking for me was a connection with the forest, streams, and lake.

In my mind the city council faces two challenges. First, how do you protect the unique character of Lake Forest Park while growing the city and making it more sustainable. Second, how do we plan for a future that is unlikely to be like the past.

I actually think the second part is easier than the first. Transportation, retail, food, and the environment are all changing and we should have our 30 year plan aimed at interesting with the future.

Transportation: We know about ST3, but, what about the rise of ride-sharing, deckles personal transportation, and micro-rentals.

Retail: Nearly every type of retail has been radically changed by Walmart and Amazon. Grocery stores are next with Kroger & Microsoft working together and of course Amazon.

Food: People are eating better quality of food and lower quantity. The number of seats at an average restaurant is going to go down.

Environment: This will impact Transportation, Retail, and Food. People care more and more about how far their products are traveling and where their food is grown. People are also more aware of where their power, water, and energy (electric, gas) are coming from. They are also more aware of where their waste (human, gray water, surface water, trash, etc.) are going.

This proposed plan does not consider these coming changes. This plan is a cookie cutter development plan driven by developers to increase rental income per acre and drive the human experience to be based on human built structures rather than the environment around them.

You should ask your self if one was to drop you in the middle of this development in 40 years would you know you were in LFP, or could you be in any number of cities in Western Washington and the country. Also, if you were to live in one of these rental units would you feel like you were part of the forest part of LFP or would you be in just another rental.

We need to be more bold.

- 1) Integrate the development with the surrounding community. Currently it is basically a walled development. Break up the west edge to integrate with the residential area.
- 2) Integrate with the Lyon Creek by creating some green space on the banks of the creek.
- 3) Create easy pedestrian access to the trail and lake with an over or under pass.
- 4) Bring in some tall pines to the development not just little city-trees.
- 5) Plan for zero carbon / zero emissions / and zero waste from the start.

Regards,
Eric

January 15, 2019

Town Center development

Thank you so much for all the hard work you do on behalf of our city and citizens.
You are greatly appreciated.

However, I do have to object strenuously to high density housing at the Town Center property on several points. How do you plan to mitigate the strain on City services such as water, sewer, diminishing green space, parking (especially in light of Sound Transit), air quality? Will the local schools be able to absorb the children?

Will these units be for low income? As part of both Rotary and LFP church, both of which provide weekend meals for food insecure kiddos, I see that as an added effort on volunteers and donors. Will there be added police presence for a greater number of people on the Center property and in adjacent neighborhoods at all hours? Has anyone factored in that owners of the apartments in Kenmore are struggling to get them fully occupied? Have we adequately explored what their high density housing has meant to Kenmore?

This project seems to be rushing ahead in favor of the developers, not the citizens. Please remember your voters as you deliberate.

Thanks for your consideration.

Allison Reagan

January 15, 2019

Alternatives for LFP Town Center

Steve,

We have lived in Lake Forest Park for 26 years and raised our kids. I have been a member of the Environmental Quality Commission for 7 years and chaired it for two. Without going into too much detail, I have knowledge of the biology and environment around Lake Forest Park. A DEIS was recently completed that appears to leave the door open to considerable

development. This development flies in the face of the recent work groups that chose an alternative of development that included mixed use: A parking structure for park and ride that keeps cars from parking on the street throughout Lake Forest Park and a community place to gather.

Needless to say, we are completely against any alternative other than what I mentioned above. A development that adds 1500 units raises the population without actually creating an adequate tax base that will cover services. This will drive everyone's taxes up as you will not capture adequate taxes from the residents of the units to cover additional demand on services. Also, it crowds our nice community full of people without a place to enjoy the outdoors and gather in small groups. It removes all of the stores in the Mall which is not preferred at all!

We prefer Alternative One. Do not change code to allow development of tall buildings and dense population. We will be in attendance tomorrow night.

Sincerely

Janice Page

David Apatoff

January 15, 2019

Town Center DEIS comments

Director Steve Bennett,

Thanks for the opportunity to comment on the Town Center development process.

The process is fascinating, and I've been watching it develop over the past couple years in our small community. I am generally in favor of careful, forward-thinking development, which seems especially important in our rapidly growing region. Hopefully our city will come out of this process with a revitalized Center that grows our town, and that all of our residents can enjoy and be proud of.

Since the Planning Commission and City Council have invited comment, here goes. I have thoughts on the process timeline, and MUPs/comprehensive land-use plans.

Timeline of Process.

The period of time between the release of the DEIS and the Council's proposed adoption of code adoption is too short, as you pointed out to your Commission at the 1/7/19 meeting. I ask you to press your Council to extend that. Please hear me out.

There is too much careful code writing needed to collapse in to the period between 2/4/19 and the proposed Council vote (before 2/28/19.) Although the process was initiated in 2017, there has been no proposals to base decision making off of until the DEIS release 1/2/19. This DEIS seems to be very light on concrete information or substantive proposals; and where it has them, it veers widely away from what the residents I've encountered seem to want, and what has been proposed in the Town's series of open meetings.

But the issue is that it this timeline encourages poorly developed code. A short timeline seems to risk having code that is not be clear and cohesive, and will invite legal challenges as it is implemented. Without more discussion, the policies and code won't be tailored well to match the Vision and the interests of the various stakeholders. And it seems like a way to rush through code adoption that has not been sufficiently vetted by the residents, the Planning Commission-- or even the Council. It strikes me that they won't even have sufficient time to read it before they vote. And finally, it seems that thrown-together ordinances would really put Planning and Development into a messy position once there are plans submitted.

The reasoning for the rushed timeline from OTAK at the 1/7 meeting was that the developers, and the Council, want to get ahead of ST3 decision making in March. But, it seems that the most immediate need is for a decision as to how the ST3 garage is designed, sited, and built—I think one of your members brought that up. Yes, ideally this would be part of a cohesive design for the Town Center. But the current rushed planning doesn't, and cannot, provide for a cohesive design. My suggestion is to present to the City Council that the creation of well-thought out, defensible, and broadly supported code for the Town Center subarea requires more than two weeks. The code allowing a parking garage to be built with aesthetic, height and usage parameters is all we need in the short term. The adoption of well-thought out code for the redevelopment of the subarea could follow over the next few months.

MUPs

There was discussion on 1/7/19 about whether to “recommend” or “require” an MUP for this project.

I think an MUP, or a comprehensive Land Use plan, should be required. For a project of this scope, with so many different components that should complement each other regarding aesthetics, traffic, cooperation with ST3 and City Hall properties, and so forth, an MUP should be required.

The cost to do it would largely be borne by the developer, which could be seen as a disincentive. However, if they truly intend to build out the entire project, and not cherry pick the highest value products, it's also in their interest to commit to an MUP.

Without MUP, it seems that the best strategy would be to build out the residential and take the profits. Then push back future phases, go bankrupt, or sell, effectively putting off amenities, utility upgrades, commercial space and other expensive commitments that were required for incentivized density. A new property owner or management team would bring a further reduced commitment to the (less-profitable) projects our city would be owed. I have experienced two unpleasant examples of this, and it ruins communities.

With an MUP, or a comprehensive Land Use Plan, the site gets built according to the plan, and with careful writing, would mostly run with the land. The MUP and code can go hand in hand, and the developer, citizens, City and tenants all have some certainty over the proposed phases of the build out.

If you wanted further insurance, require bonding. As a residential builder, I have to bond lots of parts of my work around the Northwest-ROW improvements, makeup trees, and so forth. It's simply a cost of doing business. And while other regulations can act as disincentives to investment, bonding requirements never have played that role.

From all appearances, to skip a requirement for a commitment to a comprehensive master plan is to invite abuse by the developer. Please support a required comprehensive plan in a form that gives all parties some certainty as to how the Town Center will be built out.

Thanks for your time.

Sincerely,
Steve Beatty

Mr. Beatty also sent this separate correspondence:

Upzoning Plan

Councilmembers,

I am generally in favor of careful, forward-thinking development, which seems especially important in our rapidly growing region. Hopefully our city will come out of this process with a revitalized Center that grows our town, and that all of our residents can enjoy and be proud of.

However, the current upzoning plans (Alt 2 & 3) are not what your constituents want. The word on social media among LFP residents is that the Deputy Mayor recently said "there are only 25 residents in Lake Forest Park opposed to (the upzoning.)" I attended the meeting January 16 which was overflowing with residents opposing it, and I have seen a couple hundred emails that also will contravene her (dismissive) statement. Ms. Stanford might take a few minutes and watch the video of dozens of her constituents voicing their opinions at that meeting. Regardless, since so far I haven't spoken out about any of this, I will volunteer to be the 26th resident who is opposed to it. I hope that some of you will choose to be the 27th and 28th residents opposed to it.

Since the Planning Commission and you, the City Council, have invited comment, here goes. I have thoughts on the process timeline, and MUPs/comprehensive land-use plans.

Timeline of Process.

The period of time between the release of the DEIS and the City Council's proposed adoption of code adoption is too short, as Steve Bennett clearly stated to the Planning Commission members at the 1/7/19 meeting. I ask you to extend that. Please hear me out.

There is too much careful code writing needed to collapse in to the period between 2/4/19 and the proposed Council vote (before 2/28/19.) Although the process was initiated in 2017, there has been no proposals to base decision making off of until the DEIS release 1/2/19. This DEIS seems to be very light on concrete information or substantive proposals; and where it has them, it veers widely away from what the residents I've encountered seem to want, what was developed in the Vision, and what has been proposed in the Town's series of open meetings. But regardless of what you support, the issue is that it this timeline encourages poorly developed code.

-A short timeline seems to risk having code that is not be clear and cohesive, and will invite legal challenges as it is implemented.

-Without more discussion, the policies and code won't be tailored well to match the Vision and the interests of the various stakeholders.

-It seems like a way to rush through code adoption that has not been sufficiently vetted by the residents, the Planning Commission--or even you, the Council. It strikes me that you all may not even have sufficient time to read it before a vote.

-And finally, it seems that thrown-together ordinances would really put Planning and Development into a messy position once there are plans submitted.

The reasoning for the rushed timeline from OTAK at the 1/7 meeting was that the developers and Council want to get ahead of ST3 decision making in March. But, it seems that the most immediate need is for a decision as to how the ST3 garage is designed, sited, and built—I think one of the Commission members brought that up. Yes, ideally this would be part of a cohesive design for the Town Center. But the current rushed planning doesn't, and cannot, provide for a cohesive design.

The creation of well-thought out, defensible, and broadly supported code for the Town Center subarea requires more than two weeks. The code allowing a parking garage to be built with aesthetic, height and usage parameters is all we need in the short term. The adoption of well-thought out code for the redevelopment of the subarea could follow over the next few months.

MUPs

There was discussion on 1/7/19 at the Planning Commission meeting, and the Council meeting that followed a few days later, about whether to "recommend" or "require" an MUP for this project.

An MUP, or a comprehensive Land Use plan, should be required. For a project of this scope, with so many different components that should complement each other regarding aesthetics, traffic, cooperation with ST3 and City Hall properties, and so forth, an MUP should be required.

The cost to do it would largely be borne by the developer, which could be seen as a disincentive. However, if they truly intend to build out the entire project, and not cherry pick the highest value products, it's also in their interest to commit to an MUP.

Without MUP, it seems that the best strategy would be to build out the residential and take the profits. Then push back future phases, go bankrupt, or sell, effectively putting off amenities, utility upgrades, commercial space and other expensive commitments that were required for incentivized density. A new property owner or management team would bring a further reduced commitment to the (less-profitable) projects our city would be owed. I have experienced two unpleasant examples of this, and it ruins communities.

With an MUP, or a comprehensive Land Use Plan, the site gets built according to the plan, and with careful writing, would mostly run with the land. The MUP and code can go hand in hand, and the developer, citizens, City and tenants all have some certainty over the proposed phases of the build out.

If you wanted further insurance, require bonding. As a residential contractor, I have to bond lots of parts of my work around the Northwest-ROW improvements, makeup trees, and so forth. It's simply a cost of doing business. And while other regulations can act as disincentives to investment, bonding requirements never have played that role.

From all appearances, to skip a requirement for a commitment to a comprehensive master plan is to invite abuse by the developer. Please support a required comprehensive plan in a form that gives all parties some certainty as to how the Town Center will be built out.

Thanks for your time.

Sincerely,

Steve Beatty

January 15, 2019

Thank you so much for all the hard work you do on behalf of our city and citizens.
You are greatly appreciated.

However, I do have to object strenuously to high density housing at the Town Center property on several points. How do you plan to mitigate the strain on City services such as water, sewer, diminishing green space, parking (especially in light of Sound Transit), air quality? Will the local schools be able to absorb the children?

Will these units be for low income? As part of both Rotary and LFP church, both of which provide weekend meals for food insecure kiddos, I see that as an added effort on volunteers and donors. Will there be added police presence for a greater number of people on the Center property and in adjacent neighborhoods at all hours? Has anyone factored in that owners of the apartments in Kenmore are struggling to get them fully occupied? Have we adequately explored what their high density housing has meant to Kenmore?

This project seems to be rushing ahead in favor of the developers, not the citizens. Please remember your voters as you deliberate.

Thanks for your consideration.

Allison Reagan, Beach Drive resident

January 15, 2019

City plan for shopping center

Hello,

I am sure that you have received many comments about the shopping center plan to change and rezone. I would just like to add to those comments. I find it absolutely ridiculous that this type of building, meaning plan 1, 2 or 3 would be allowed at the Lake Forest Shopping center. There is no room for it. Lake forest park is made up homes that are one or two stories and the plan to add an 85 foot structure in the center of a shopping center is crazy. One it will be terrible to look at and two, how are all these people going to fit in our tiny community. The traffic is already an absolute nightmare and you're planning to add to the nightmare by adding more housing to an area that can't handle the influx. The intersection of 170th and Bothell way is already a huge hazard to pedestrians and cars who try to leave Sheridan beach. We have people who speed down our streets to try to buy pass the lights and the city wants to add to this problem by adding more housing, that not a smart decision. What about the impact of the creeks that run along the shopping center and the fact that nothing new is supposed to be built with in 100 feet of these creeks?

This overall plan for the shopping center, be it 1, 2 or 3, are all bad ideas.

Concerned Citizen

Elizabeth Nank

January 15, 2019

We have read the DEIS and attended some of the meetings/workshops on this topic. Unlike our larger neighbor to the south where people seem to believe there should be virtually no limit to housing density, people live here, in this city, to enjoy our high quality of life. We believe in environmental protection, trees, parks, and open space. We want to protect salmon and see their return in large numbers to our streams and forests. We don't want or need to be like Seattle if being that way will destroy the character of our town, destroy our quality of life, and damage our fragile ecosystems.

Nothing in this DEIS has convinced me that Alternatives 2 or 3 would be better for the residents of this city. We do need more parking at the Town Center and we need an improved transit infrastructure. It is becoming very difficult to drive to Seattle due to traffic congestion and we should do our part to reduce this congestion. However, neither of these needs requires a huge upzoning of the area. Upzoning itself will not help reduce traffic congestion, improve environmental quality, or bring salmon back to Lyons Creek. Quite on the contrary Alternatives 2 and 3 may increase local traffic congestion, damage the environment, and make it more difficult to restore our salmon runs.

No amenities are promised in return for increase zoning. We will house more people but it will cost us in loss of our town's character and may result in loss of our resolve to improve, not degrade, the environment.

I strongly urge you to support and approve Alternative 1. It's the sensible alternative for our community and for the core values of our citizens.

Thank you.

Dave Haddock
Diane Haddock

January 15, 2019

Letter of support for Option 3

I think you're the right person for this, if not feel free to forward. I support the highest density housing plan for the LFP Town Center. Density is the opposite of sprawl.

Yours,

Ken Berkun

January 15, 2019

Comments Regarding DEIS

I participated in the first community visioning meeting last January. It was fun, interesting and exciting. I have read through the new DEIS, and have some immediate reactions. First of all, my reaction to Alt 3 is no, absolutely not. This is not at all what I envisioned. It is too high and too dense. We wanted much more outdoor open space.

I think that a more appropriate height for the site, in keeping with the surrounding community should be no more than 50 to 60 feet (5 stories).

I think mixed heights would be preferable to all of one the same height. I am a big fan of the upper story set-backs that I have seen in Vancouver BC.

I think that the restrictions already in place were well thought out and appropriate. I can see the advantages of some of the ideas in Alt 2 and would find it acceptable with the lower height limit as stated above.

As for residential housing, Lake Forest Park is already housing dense. I don't see the need for a lot of additional housing units (especially family housing) at the Town Center site). The one thing that I do see the need for is senior housing. My husband and I are retired and 65 years old. Ideally I would love to have a CCRC facility there, but those are usually very large. Senior housing with the option of additional assisted living would be very good.

So, Take Figure 2.1
Conceptual Planning Scenario for Alternative 1

Put all of the parking in the lower half of the diagram underground and landscape the area for outdoor activities such as festivals, wading pool, outdoor seating, picnicking etc. I particularly like this image from the cover of the DEIS.



The current traffic patterns within the Town Center site are terrible. Minimally, we need a stop light controlled intersection at all entrances on both Ballinger Way and Bothell Way.

From Nan E. Cohen

January 16, 2019

Lake Forest Park Center Proposed Changes

I am sorry I cannot attend the meeting this evening. I favor keeping the existing rules in place that require approval for any changes to the LFP Center. I do not want 7 story buildings. Also I favor keeping the Center commercial only.

Janice Franett
16717 32nd Ave NE
Lake Forest Park, WA 98155

January 16, 2019

Input On Town Center Re-Development & Negotiating with Merlone Geier

Greetings Mr. Bennett & Company!

It looks like we are suppose to direct comments about Town Center re-development to you. Please share what I am writing here with the City Council, Mayor and the community.

Instead of re-writing what I had to a good number of our Lake Forest Park residents via Nextdoor this morning after completing some initial research in to Impact Fees, please just accept the information I have cut, paste and included below.

Additionally, I do want to stress that I have not heard any discussion of Impact Fees which look like they can be used as an exceptionally effective negotiating/financing tool. My primary concern, identified below, is that residents of Lake Forest Park, including new residents to the Town Center **DON'T** get stuck paying for necessities/amenities for which Merlone Geier & company should be paying UP FRONT. As far as I am aware, Impact Fees were not a part of the Southern Gateway negotiations and development. This was a disastrous mistake. In my opinion, which I do believe is shared widely by Lake Forest Park residents, the Southern Gateway development is a disaster and should definitely not be repeated at the Town Center. I do think using Impact Fees as allowed by the Growth Management Act can give you/the City the leverage (and financing) to do what needs to be done in order to have the Town Center re-developed appropriately. If not, the Town Center should not be re-developed.

Nextdoor Comment (/Info)

Impact Fees may be huge. \$15,000,000 might be cheap for Merlone Geier.

In doing some initial research in to impact fees, I have found a range of \$3600/unit to \$28,000/unit (Oakland, CA) with Sammamish charging \$15,000/single-family residence. Having heard Impact Fees could be about \$12K-\$14K/unit, \$10K/unit for 1500 units would be \$15,000,000 and that might be the low end for a great location like Lake Forest Park.

Considering we might need to build a new school, and that we do see new schools going in to housing developments (Eastridge Elementary and Timbercrest MS in the Northshore School District being a couple of many, many examples), I do think this, as well as the City being honest about the current maximum allowables, should be front and center.

Whatever the case, Lake Forest Park residents SHOULD NOT bear the costs of re-developing the Town Center, especially as not addressing such now creates long-term problems (as in Seattle now needing an estimated \$675 Million for sidewalks, ...alone).

=====

Samamish/\$15,000

<https://seattletransitblog.com/2018/03/28/seattle-edging-closer-implementing-impact-fees/>

Oakland/\$28,000

https://www.investopedia.com/terms/i/impact_fees.asp

Thank you! I do hope for the best on all accounts. I just don't want Merlone Geier taking advantage of anyone.

~ Jason Colberg

Mr. Colberg also submitted this correspondence on February 1, 2019:

DEIS Input

Greetings!

It looks to me like there is City Code documenting limitations on unit numbers for Town Center re-development and the **maximum** number of units currently allowed would be **113-127 Dwelling Units** (depending on LFP Town Center acreage being 16-18 acres).

“Residential uses may not be developed at a density of greater than seven dwelling units per acre.”

(LFP City Code Town Center Chapter 18.42.040.A, Limitations On Use).

If you asked me, I'd say that clearly limits residential unit development to 113-127 Dwelling Units for the Merlone Geier owned portion of Town Center property. This should be the baseline number (not 400, or 700-1000 units) for the Take No Action option of the EIS. I've searched thoroughly and this is the only documentation of a specific, formalized, legally binding limitation on re-development of the Town Center including residential development/use.

Also, please make this message available to the public.

Thank you!

~ Jason

Jason Colberg

January 16, 2019

DEIS Response Traffic & Walkability

Dear Steve Bennett, Mayor Johnson, and City Council,

We moved to Lake Forest Park in 1999, newly married. We have always hoped the Town Center would be a vibrant center to gather, grocery shop, and enjoy a cup of coffee or shared meal with friends. A gathering place where all of our necessities could be purchased and we would see friends. We have achieved much of this with a hardware store where people know our name, a Starbucks where people know our favorite order, and neighbors that are more than 'just' neighbors.

The number one reason we chose Lake Forest Park was walking to the LFP Town Center and bike access to Burke-Gillman trail. I envisioned a walkable town where my family would bike and walk to our favorites; Civic Club, Sheridan Beach, Mod Pizza, Ace Hardware and Burk Gilman.

'Walkability' in our neighborhood changed a couple of summers ago when we experienced a detour in traffic patterns. I now know what traffic feels like and what it does to walkability; accessing the Town Center and pedestrian safety. This happened when Bothell Highway 522, in 2015, closed for the new fish culvert. All traffic on 522 was detoured through our neighborhood. It was a constant roar of cars. We did not go to the Town Center that weekend – we did not leave our house! This is what I am envisioning our Town will feel like when BRT rolls down Bothell Hwy and 1500 residents reside, in one of the many 7 story towers at the Town Center. At what point, did we decide we had to crowd in as many cars and people into a Town Center to make it vibrant and viable? How many cars, how many micro-apartments, how many people does it take to make this project profitable? We are losing something of value: a Town destination we can walk and bike. If people didn't want to walk to our town center before, they certainly will not in the next 20 years.

I am writing to request you to **study** the impacts of traffic and car density on our Lake Forest Park Town and the Town Center. Would you please look at traffic studies to ensure the safety of people walking, access to and within the Town Center, and ability for all to enjoy the roads to reach our destination. I would like the focus, as you conduct traffic studies, to be the homeowner, or any resident of Lake Forest Park, and not the transit center and developer.

It concerns me:

- Cut-thru traffic from Woodinville and Bothell through Lake Forest Park streets to reach ST3 Stations on 145th and 185th
- Solutions to slow down speeds on the major highways and traffic calming on our local streets
- Car build-up in the intersections accessing BRT Parking Garage at the Town Center (how will we get to Starbucks!?)
- Bottlenecks for fire trucks in and out of Station 57 and police cars leaving the station (which is at the Town Center!)
- Car storage parking in Sheridan Heights, Sheridan Beach and Brookside Neighborhoods (1500 residents 'extra' car – the one they don't drive)
- Trickle-down traffic from Shoreline and North City to access 522 Bothell Highway
- High speedways on Brookside and 178th (because it's all downhill and people know when to slow down for the camera)

Alternatives 2 and 3, with 1000+ to 1500 more resident units and a 300 car parking garage, will not improve our Town or walkability.

Look at people walking and biking on Lake City Way – they are racing for dear life.

Please slow this process down, think, study, and analyze the traffic.

Thank you,
Shary Van

January 16, 2019

Town Center Comment re: Environmental Impact Statement

Dear Mr. Bennett,

I am writing as a resident of Lake Forest Park to urge our city to reject Option 2 and Option 3 of the proposed changes contained in the Environmental Impact Statement. As the Town Center is literally and figuratively the center of LFP, I am deeply concerned that the city is moving forward without considering the negative impacts of unmitigated growth and resulting environmental impacts.

While some growth is necessary and understandable, the supersize options 2 and 3 seem completely divorced from the character, location, environment, and reality of our town. We are already gridlocked in traffic in the morning and evenings. An exponential increase in traffic that would follow the building of 1,200+ residential units in an area already dealing with bumper to bumper traffic boggles the mind. Instead of being surrounded by our majestic trees, we will be shadowed by 5 and 6 story high housing units. Most importantly, as a parent of school-age children, the exponential increase in traffic would almost guarantee a more dangerous condition for walkers and bicyclists.

Additionally, the move to change the character of the Town Center space to a residential housing complex would result in the disappearance of Third Place Commons and a critically important place for community members to gather. That would be a tremendous loss.

Therefore, I respectfully urge our city to reject Option 2 and 3 and retain our current zoning laws. You, the city council, and our mayor have a duty to help retain the character of our city and to maintain and enhance the quality of life for the city's residents.

Carrie Sanford

January 16, 2019

Feedback from Aloe W., 9 years old, LFP

dear Mr. Steve,

My name is Aloe and I am 9 and three quarters years old. I like town center how it is right now because i can walk around there to the stores and get books and maguzins and my hair cut and candy with my friend clare who is 10. i like to talk to the store owners too they are so nice !!! We also like to meet People there who are frinds and are family and town center is just a fabyoulus place for having fun!!! but with

this many thousands of apartments towering over us i would feel uncomfortable going there with most people except my mom and i would consider going somewhere other than that place if you do this to our town center. Please make it so we can still do this.

sincerely your hopeful friend Aloe
(9 year old from Lake Forest Park; submitted by Jessica Ketcham)

p.s please write me back.

January 16, 2019

LFP homeowner comment on the DEIS

Hi Steve,
As a Lake Forest Park homeowner and taxpayer, I wanted to submit my comments on the DEIS.

I chose Lake Forest Park because it is the most densely forested urban area in the Lower 48. I love wildlife; I love big, old trees, large parklike lots, and low density where the homes blend in with the natural surroundings. I strongly oppose cutting of trees and increased density. The citizens of LFP are committed to what makes Lake Forest Park unique; we DO NOT have to capitulate to the region's demands for more development, fewer trees, clogged roads and insufficient infrastructure. The bottom line: we need to be committed to what makes LFP unique. We do not have to agree to what some people call "progress" -- we need to stand our ground and do what works for US, not what works for Ballard or downtown or the Eastside.

The people of Lake Forest Park consistently rank environmental quality and protecting the character of our town as highest priorities.

As such, I support **Alternative 1 No Action**- No adoption of a specific Town Center Plan; redevelopment would be subject to existing code requirements with no revisions. The maximum allowed building height under current regulations is 60 to 66 feet.

Thank you for your time,
Cindy Marzolf

January 18, 2019

Yikes! 1500 residential units is a community killer.

Please put in my vote for option number 1. 300 units would be acceptable, but more units would cause too many unintended consequences: change in community concept. LFP is quite unique in its small town

atmosphere. The high building, parking space destruction, traffic, and destruction of the Commons would be catastrophic.

Kathy Martinez

p.s.: we were supposed to get a traffic revision on 37th to discourage commuter traffic on this residential street.. Looks like city counsel dropped the ball on that one.

January 22, 2019

Draft Environmental Impact Statement Comments

- There appears to be a complete and total disconnect between the Town Center Vision and the DEIS.
- As stated by Town Center Vision Taskforce members in the January 16th meeting, the DEIS does not have anything in it related to the Town Center Vision.
- The 'Bonus' aspects of the DEIS have no basis in the LFPMC.
- The time to review such a radical departure from the Town Center Vision is far too short for adequate analysis and comment.
- I believe the entire DEIS and the schedule is a wrongful act by the City in violation of the public trust.

The DEIS and schedule must be tabled until the Town Center Vision is fully incorporated therein.

Sincerely,
Richard (Eric) Strom

Mr. Strom also submitted these comments on January 24, 2019:

I have read the 'Town Center Vision', and based on that work, which was to define the vision via communication with citizens, youth, organizations and businesses within the city, I looked forward to a well-reasoned, thorough, Draft Environmental Impact Statement (DEIS). I expected the DEIS to fully incorporate the Town Center Vision.

Imagine my and other citizens' dismay when the DEIS was released on January 2, 2019.

The DEIS bears no resemblance whatever to the Vision.

In fact, members of the Vision Taskforce spoke at the January 16, 2019, meeting, stating they could find no trace of the Vision in the DEIS.

Instead, the DEIS would level the current Town Center, and put up between 700 and 1,500 apartment units in 85-foot high-rise buildings, along with a 300 space Sound Transit Parking Garage where the current Medical building stands. Only City Hall, Windermere, and Starbucks would survive. The Third Place Commons space would be relocated to the top of the Transit parking structure.

Also, little time was allotted for citizen review, with comments due in one month, and city approval in two weeks after that. It will take much more review and analysis to come up with a DEIS that makes vision sense for the citizens of LFP and for the Town Center.

I believe that the current DEIS and schedule for its adoption constitutes a wrongful act by the city government in violation of the public trust.

The DEIS must be tabled until such time as the Vision can be fully incorporated into the DEIS.

Sincerely,

Richard Strom

January 22, 2019

Town Center Redevelopment

Dear Mr. Bennett,

As a 23 year resident of LFP, I am concerned that the proposed changes for LFP Town Center will allow dramatic increases in density and could irrevocably change our town's character and environmental quality.

I support **Alternative 1 No Action**- No adoption of a specific Town Center Plan; redevelopment would be subject to existing code requirements with no revisions. The maximum allowed building height under current regulations is 60 to 66 feet.

Regards,

Deb Gilbertson

January 22, 2019

LFP Town Center Plan comments

In regards to the plans for expanding the LFP town center as an LFP resident:

I am concerned that allowing buildings taller than 5 stories will change the character of the town center and LFP in general.

I am concerned by the lack of plans for the increased traffic around the town center that will result from the planned new sound transit parking.

I am concerned by the disappearance of the town center commons and lack of open space/green space should the expansion of the town center result in buildings taller than 5 stories.

Thank you for taking my concerns into consideration as expansion plans are developed.

Emily Jo Rajotte, MPH

January 24, 2019

DEIS Vote

Hi Steve,

I am a homeowner in LFP on 180th Street and am writing to let you know that I favor Option 1 of DEIS, with no changes to current zoning that would support larger development of Town Center. I have heard this sentiment echoed by the majority of the citizens interested in voicing an opinion. It is unfortunate that so much time and effort went into creating alternative plans that do not represent the majority of the citizens.

In terms of the Sound Transit plan for a garage at the Town Center, I am confused by the appeal of such a garage for the Rapid Transit line on 522. If I have to drive to park to get on a bus that then will connect with a light rail line at 145th, why would I drive to the LFP parking garage instead of driving to the parking garage to get directly on light rail at I-5 and 185th? It's only two miles away and requires no transfer. I just don't think commuters will do it unless they are walking. I do recognize the need for a parking garage and perhaps this is the angle to get the funding from ST. I hope that any garage built is an underground garage with a walkable plaza on top of the garage. Perhaps three story condos above that. Anyone who has traveled internationally can see the positive impact of a city that has a central and open plaza (at street level, not rooftop. Only teenagers or homeless may take the effort to get away to a rooftop and then you have a host of other problems!) I imagine the developer will want more growth for potential profit, but lets think long term, maybe even seven generations.

Cindy Butler

January 24, 2019

Absolutley NO lived here for forty years because of the beauty of the community and large lots and trees tax me more if you need money

Gale Owens

January 24, 2019

Horrible vision of an intolerable future

That photo (on the email about new building codes for LFP TC) is a disaster. We did not choose to live in downtown Seattle or Bellevue! The proposed huge buildings all clustered will bring a congestion and change of environment that would cause me to flee the area, if I could afford to sell my modest house on 178th. It seems everyone uses this "rural road" as a shortcut between I-5 and Lake City Way...I can hardly get across the road to my mailbox as things stand now. I would definitely never go to Towne Center again if it looked anything like that nightmare. I would go over to stores on Aurora, or to 15th/145th, and just avoid the whole area if it looked like that.

How could anyone think our roads, libraries, schools as well as natural resources would support this sort of population density? This is just nuts.

Thank you for soliciting input.

June Ireland

January 24, 2019

Town Center EIS commentary

Hello Mr. Bennett, and anyone else who may be interested in citizen feedback,

We are writing to express our dissatisfaction with the proposals coming forward for redevelopment of our LFP mall. Our home was built in 1970, and we are still the original owners and taxpayers.

One of the main problems we see is the **placement of a garage for ST3 parking**. This structure is in the same spot in all three diagrams. It appears to hem in the City Hall and Police Station. We do not see where the police vehicles will park and how they will have quick exit ability with traffic in and out of this garage. Yes, yes, details, details. To us this is quite important. PLACE the PARKING GARAGE ELSEWHERE, not in the middle of the town center.

Access to City Hall is also severely limited especially in proposal number 3. We citizens need unencumbered access direct to the City Hall, without having to drive around looking for parking that may be more than a block or two away. The City Hall was placed there first, so needs some open area and access. Hemming it in is very unreasonable and could even pose a danger.

This redevelopment can not possibly be all things to all people! We are an aging population and most of us do not want to be crammed into a very small apartment even if it is next to grocery and some other conveniences. We will drive our vehicles until our license is literally taken away. We will shop and go to medical appointments that fit our time and needs. We are not going to ride bicycles. Driving is the safest for us as we make appointments outside of the peak traffic hours.

You cannot force us to take a bus for just a few blocks when the weather is not nice and the bus is not convenient anyway. If the city wants a vibrant commercial center, it must continue to have easy access and parking for ALL of the citizens.

We expect some change, but also hope some input from citizens who live here and use the area will be given some consideration.

Respectfully yours,

Stephanie and Emile Ninaud

January 24, 2019

Town Center Plan

Dear Mr. Bennett,

In reference to the new Town Center Plan, I already see you will have your hands full of many, many “not-in-my-backyard” comments. However, as you know, Town Center is outdated, needs to be made more viable for all, including to the owners who require an adequate return on their investment.

However, as one of the newest residents of Lake Forest Park (its only been two weeks since my new house at 19215 40th Pl was granted an occupancy permit) and as an architect ... I will leave those building issues to other.

What I am most interested is that the access roads to Town Center are not safe for bikers. The current Town Center report clearly recognizes the issue, but I fear it will be lost in all the arguments over building massing and apartment resident counting.

Lake Forest Park has a world class bike route running right through it, the Burke-Gilman Trail ... with VIRTUALLY NO SAFE WAY TO GET TO IT. Tragedy. Certainly serious considerations should be given to safe walking and biking lanes on Ballinger Way. I realize that putting concrete curbs, gutters and sidewalks on both sides is expensive. BUT, it would increase usage for a city that has already been *built upon successfully attracting walkers and bikers.*

So I hope making safe bike passage from the immediate neighborhoods past the Town Center to the Burke-Gilman Trail becomes a high priority. This is the City’s chance to fix an unacceptable access issue and (seriously), resolve a potentially huge liability the City has in having a *high desire goal of using the Trail* having currently passing through *high hazard car drivers.*

One last thing I would like to throw on the discussion pile. Please note the successful passage by the City of Shoreline where their citizens passed a (God forbid) tax increase on themselves to provide concrete curbs, gutters, and SAFE sidewalks for many miles of existing streets. That campaign would be worth studying at Lake Forest Park for the same, much-needed improvements to our unsafe, open ditch trench (the 1920s?) streets.

Thank you for listening,
Roger Wallace,

January 24, 2019

NO HIGH RISES IN LAKE FOREST PARK!!!!

This isn't AT ALL in line with the community.
NO HIGH RISES IN TOWN CENTER

A resident

January 24, 2019

Town Center development

As a LFP homeowner, I support continued low density in our community. I support no building be allowed over two stories, no increase in population, or more traffic.

Today at 7:15 am it took 20 minutes for me to drive from 195 Street and Ballinger to Bothell and Ballinger. Then another 25 minutes to reach 135th Street in Lake City. When I try to drive down 15th Street to reach 135th Street, it takes just as long. It is unfair to the current residents to increase the density of this lovely city. Leave it as it is, or even lessen our traffic problems. Do not make it worse!

Linda Silber

January 24, 2019

FW: Please, slow down code changes for Town Center redevelopment

Hello, Members of the Council & Mayor Johnson,
I will miss tonight's Council meeting to attend a "Salmon in the City: Ecology & Urban Design" presentation downtown.
It is a very timely topic given that our own Town Center was once a wetland at the confluence of two salmon-bearing streams.

I am writing to ask that any proposed code changes related to future Town Center redevelopment be separated from the deadline for code changes needed for the ST3 parking garage. You can slow this process down and do it right.

I, like many others, participated in the "Visioning" meetings and am fairly satisfied with the Vision document that resulted. However, I feel this DEIS is woefully disconnected from that vision. It makes huge leaps in projected housing numbers, even under the supposed "No Action" Alternative 1. The DEIS is inaccurate, misleading, and lacking in critical studies to support the alternatives. It therefore fails to fulfill its primary purpose of providing the basis for meaningful comment by the public.

From the YourLakeForestPark website regarding the Vision:

"... The Town Center Vision will capture the community's long-term interests and serve as a framework

Through the Town Center Vision, the community has the opportunity to influence how the City will keep pace with its growing population and set the course for an enduring, transit- and people-oriented Town Center that's consistent with Lake Forest Park's values."

The Alternatives in this DEIS are not representative of the community's long-term interests or consistent with Lake Forest Park's values.

From the Vision report itself:

“These investments in the future of Town Center present an important opportunity for Lake Forest Park residents to help shape the longterm vision for the heart of their community. Now is the time to clarify the desired future for the Town Center ...”

The Vision Report did a pretty good job of clarifying *the desired future for the Town Center*.

VISION FOR THE FUTURE:

“.. 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.”

In comparison to its peer cities, Lake Forest Park has the fewest acres of city-owned park land. Citizens here consistently rate environmental quality as a very high priority. It strikes me as very sad that the City is still holding the Stewardship Foundation and the community hostage over the final piece of acquisition funding for 5 Acre Woods, when you have spent somewhere around \$675,000 on this process to result in such pro-development code changes?! It seems quite out of touch with community values.

Please don't give away the opportunity for more community green spaces and riparian zone improvements. Proposed high density and extreme building heights would irrevocably change the very heart of LFP forever. This is a missed opportunity to improve “green-ness” of our only Town Center, while guiding redevelopment and revitalization that fits the character of LFP.

Slowing down this process is in the best interests of the community.

Thank you,

Kim Josund

January 24, 2019

Town Center redevelopment

My name is Cathy Harber. My husband and I have lived in Lake Forest Park for 20 years. Unfortunately we are appalled at the idea of a seven-story development at Town Center. We know that a development like this will essentially change the character of the entire city. We think it is rushed and money oriented. We strongly oppose this idea. We know that redevelopment needs to happen and we are willing and able to be involved in the process, if our input is actually heard. We think there is room for some development but what you are proposing is beyond what the city can handle and will essentially gridlock and ruin LFP. We came here to raise children. We stayed because of the character of our town. We do not want to be like Kenmore or Shoreline or Ballard. The nature of our canopy and slower life is why we are here. Please slow this process down so that more people can become aware of this and give their input. We do not believe that people yet know this is happening. Cathy and Brian Harber. 206-372-7811. Horizon View

January 25, 2019

Thank you, Steve, for the opportunity to contribute and for the well-communicated process whereby we can share with you our feedback. After attending last week, I have a few more comments to add (and this, in addition to my original mail below, can be my official comments).

- I believe all 3 proposals will negatively impact traffic, density, safety and character of our community, as all 3 proposals have far too many housing units. Coupled with 300+ daily vehicles from ST3, the negative consequences will be high and far-reaching.
- The consultants implied that 700+ units are necessary to fund redevelopment and the many asks from the community. Not only does this appear to be a gross mischaracterization of what our citizens and task force members asked for, it's short-term thinking that will have significant long-term impact on our community.
- All 3 of the consultants' proposals appear to be focused on development incentives via revenue generation (short term thinking), versus creating a sustainable, usable, engaging community space for many years into the future. This is not a random development along a busy highway, it's a Town Center which will impact who stays here, and who moves here, for many decades to come. The legacy of the community space we build will shape the economic and cultural future of Lake Forest Park. Making the wrong decisions on traffic and density in the short term will create a community far different than the one we have today.
- The process itself feels terribly rushed; for something so monumental to our community's future I would expect a longer timeline with much more input and discussion.
- As stated below, I do support redevelopment and modernization of Town Center, including mixed-use development and some level of diversified housing. However, this community deserves a proposal with far fewer units than #1 (700), and with much more of the VISION task force's input included.

Thank you for the opportunity to share my point of view!

Amy Bohutinsky

In addition the following email was submitted by Ms. Bohutinsky on January 16, 2019:

Re: Town Center

Hi Phillipa,

I have to apologize - I thought I answered this December mail and I just checked back and never did! December was a crazy month for me with a lot of travel, but that's no excuse. Thank you for following up and I'm sorry I wasn't able to do the same!

I would still love to meet with you 1:1, and promise to be more diligent in setting a date. In the meantime, I wanted to let you know that I, and a number of my neighbors in Sheridan Beach, will be at the Town Center meeting tonight. We are very concerned with all 3 concepts and their impact on traffic and congestion. Coupled with the additional 300 stalls for park and ride, and increasing suburban density, I am truly worried for the future of our beautiful community. I can't imagine the impact of adding 700, or 1200, more more apartments and ensuing cars and congestion to the mix.

As I mentioned briefly when we met, the City Council has a once-in-a-lifetime opportunity to significantly change the course of this town and community, for ourselves, our kids and future generations. The decisions around Town Center could be the single-most contributing factor to the outcome.

We support mixed-use development and better commerce, and we support some apartments to create the type of upscale multi-use community that this large and well-positioned space could hold. However, density/transportation has to be a contributing part of the decision, and I'd love to see an option with far fewer apartments and a full study on the transportation impact to our community and local roads.

Thank you -- I hope we can meet 1:1 soon to discuss more! And as I mentioned, I'm more than happy to help with any real estate data from Zillow that could aid in studies on community impact.

Best,

Amy

January 25, 2019

High Rise Apartment Building

I am writing to express my concern and objection to the proposed high rise building at the Lake Forest Park Town Center. I am a long time resident (going on 19 years) of this community and over the years we have already seen an increase in the traffic on Ballinger and Lake City Way. We have also seen our classroom sizes increase and overcrowding in the schools.

Properties are being subdivided, small housing developments are being built. We are already seeing an increase in the number of residents here, we simply cannot handle the impact that high rise apartment buildings would have on the area. Not to mention the change to our skyline. We have a small town feel which is part of the allure to Lake Forest Park, please do not turn us into a big overcrowded city by introducing this high rise apartment.

Please vote no on this and do not consider building this!

Lissy Des Voigne

January 25, 2019

Code Changes considered in haste?

I would like to express my concern and dismay at the proposal to create 7 story buildings at Town Center. This is a huge deal for our small town and your haste at the Planning Commission meeting seems to be a bit closed-door-meets-cloak-and-dagger. While we are all in agreement that Town Center needs attention and that more commerce is good for our city, 7-story apartment or condo buildings are an extreme leap.

I will check out our city website, where by law agendas, memorandums, proposals and attachments should be located. As a concerned citizen I will pass this information along to fellow citizens.

It is my understanding that concerns must be received by February 1st. Is this correct?

Thank you for your time,
Lisa Planchich

January 25, 2019

Written response for Lake Forest Park city planning

Dear Mr. Bennet,

I'm writing to you in response to an email that's going around Lake Forest Park today, regarding the planning of the ST3 and Town Center redevelopment.

My family and I, homeowners in Lake Forest Park, are ready for anything. We want to see major improvements to housing density - meaning higher density - and transportation code in our small city. North City, Kenmore, Bothell all have made the right moves in allowing fresh and new architecture and business opportunities, night-life, entertainment, housing and density, and redevelopment of their town centers.

We risk becoming the blight of 522, rather than the respite from the city. There is still ample housing external to the city center, but the property taxes are ridiculous, and the solution in our minds is more businesses, more commerce, more people. Maybe we need to build another school. Maybe we need more infrastructure. We need to be attractive to a wide and diverse population that wants to come to Lake Forest Park for all we have to offer, either for a night out or to live.

It is of course inevitable. Change is the only constant. NIMBYs have the wrong idea about our future. Of course it's a little sad, but evolve or die is the motto of the modern era. What's sad to me and my family is we have to leave the city for 90% of our shopping needs, dining, and anything fun.

Thanks for hearing us out.

Best regards,

Jonathan Mitten

January 25, 2019

Proposed Zoning Changes LFP

Hello Steve,

I am writing to you as a lifelong resident of Lake Forest Park. My parents moved to Lake Forest Park when I was 18 months old. I grew up in the house we moved into then and didn't leave until it was time to go to college. I moved out of the state for a few years only to return after graduating. I now live in Seattle, but I spend almost every weekend at the house I grew up in. Every Saturday, I look forward to coming back to the small enclave of serenity and separation from the hustle and bustle of the rapidly expanding and changing City of Seattle that is Lake Forest Park. LFP still has that small town charm that I loved growing up and fought to protect as a five year member of the LFP youth council. As president of that council, I worked closely with then city council members to host and improve community events which reflected the values of community, neighborly appreciation and respect for our natural environment. I believe to this day many long time LFP residents still hold these values dear and would be distraught over the destruction of those values a mega project like this would cause. After a significant up zone and the ensuing inevitable development, our cozy enclave amidst the relentless expansionist and often impetuous nature of Seattle, would be nothing but a memory. I would be surprised to learn that you aren't also a resident of LFP who would be impacted by a zoning decision which reflects such abject disregard for our community values a decision like this clearly signifies. Surely you must, at least in part, agree with me that the neighborhood we've all come to love would be lost to time, a thought I cannot bear to maintain. Feel free if you have the time to respond and address my concerns. Otherwise, please consider carefully what I have written, and know that my thoughts are shared by many of my neighbors, friends and fellow community members of Lake Forest Park.

Sincerely,

Concerned resident

January 25, 2019

Max Density & Heights Raise Concerns

Hi Mr. Bennett,

We bought a home in Lake Forest Park, two years ago. Never being there before, we explored the Towne Center and the Civic Club. It was a large portion of the reason that we choose to live where we do. We wanted a town with a kind of "small town feel". A place where you could get to know your neighbors and live in a safe environment for our now 5 year old, while also having my 75 year old mother live with us. Turning the Towne Center into a 5-7 story buildings, with 1500 new households does not fit our vision of where we wanted to live and have grown to love.

Can you advise on the following plans?

- What plans are in place for natural environment protection?
- Will there be increased police and fire personal
- Will these new households be allowed in the LFPCC?
- What are the plans for all of the additional traffic that will be created?

- Will additional walk ways be created across from the town Center to the Lake?
- What things will simply go away from the Towne Center?
- How will the parking be handled?

Our household is open to change. Perhaps a few new restaurants in the town center, nicer grocery store, a yoga studio, etc... and/or a remodel.

Raising the population, traffic and accessibility of the Town Center at this time, feels rushed and irresponsible.

Thank-you,

Melissa Ross

January 25, 2019

Mall development proposal

Steve

I believe it is critical to both the economic and environmental health of this city that the ST3 project and the mall redevelopment project be separated. There needs to be much more planning and consideration of the future of LFP with regard to the development of the mall and the impact on our city. You need to carefully take that into consideration with any further development to this city.

Please make the right decision.

Linda Holman

Ms. Holman also sent this correspondence on January 25, 2019:

Mall redevelopment and ST3 project

It was very disappointing and concerning to see no Council representation at the meeting the other evening to discuss these critical issues. It is imperative that they be considered separately.

The impact of your decision here will impact our lives for many years. I implore you to do the right thing and take enough time to develop our city in the right way and for the economic and environmental protection of us all. Please make the right choice and give this issue the time it needs to be developed appropriately. As our elected officials you are charged with the well being of the city.

Linda Holman

January 25, 2019

proposed zone changes for LFP Towne center

To the LFP city council,

It is well past time for the city council of LFP to LISTEN to the people you are supposed to represent.

This council appears to have an agenda which is separate and different from the desires of the people who live here. You want to make changes to the zoning at the town center to allow for 5-7 story building. Why? Are you just imagining the money you will receive thru all those new property taxes? What about our streets, our forests, our schools, policing? Do you have no concern for how the rest of the city is supposed to absorb an extra 1500 housing units?

You have had over-flow crowds at your meetings expressing the desire that you NOT change the zoning at the town center, or at the very least, that you only allow the minimum level of development. But you seem hell bent on proceeding with your own "vision" regardless of what your constituents want. Have you not looked at Bothell, driven thru there and seen what a disaster has been allowed there? It is impossible to drive there, it isn't even close to the "neighborhood" that it used to be, and it is NOT better! It is a blight! And you want Lake Forest Park to do that too???

I ask you to consider what your children and grandchildren will think of your "legacy" if you destroy LFP by being driven by greed rather than ethics.

Listen to the people you were elected to represent!

Sincerely,
Ann Compton

January 25, 2019

LFP mall plan

Hello-

I am writing to express my disappointment in the proposed plans for up to 700 housing units in our town center area. I find it very hard to believe that these options are based on the many forums the city has advertised so widely asking for citizen input. Everyone I know is appalled and it makes the process look suspect.

The drawings do not look like an expansion of the mall/gathering spot we currently enjoy to include some housing, but rather a dense housing development with some access for citizens buried in there. I don't know how the city will support that many new residents in a condensed area and it certainly does not look like a welcoming place for the current citizens of LFP to gather.

I hope you will go back to the drawing board and review the comments from citizens again. This plan looks like it is designed more for the developers.

Sincerely,

Sally O'Connor

January 25, 2019

Town rezoning

Steve Bennett
Dept. of Planning and Building
Lake Forest Park

I have lived here for 50 years so I am not a newcomer. In that time I have learned of several proposals to "modernize" our city by increasing the density of housing.

I am totally against the current proposal.

Marianne Gutteridge

January 25, 2019

DEIS - Citizen Comment

Steve:

In my opinion, the current DEIS *does not represent most of our views* or those of the hundreds of citizens who participated in the visioning process. Even the supposed lowest level of development (Alternative 1) would allow hundreds more housing units than were ever discussed in the visioning.

The Town Center could be revitalized without changing the nature of the Town Center. It's been such a central community gathering place for decades and changing that dynamic isn't what most of us envision for the future.

The currently proposed alternatives are not what most citizens want.

The Council should not adopt pro-development code changes based on this flawed DEIS.

Best Regards,

Connie Ward

(LFP Resident Since 1977)

January 25, 2019

Mall redevelopment designs

Mr Bennett

I'm sure you'll NOW have plenty of citizen commentary on the mall redevelopment, thanks to the LFP Stewardship Foundation's latest newsletter.

Since you are the planning director of our city, I feel sure that you wish to hear from as many of the citizens as possible in regard to the design of any redevelopment at the mall. Therefore, there is absolutely no reason for the aforementioned redevelopment to be rushed through without careful examination of the options available.

Just so you know, you are widely seen in this community as overly friendly to developers. It would serve you well in this community to not be seen as overly friendly to developers. My suggestion to you is to tread carefully through the minefield and examine public opinion with exquisite care and regard. Do not rush this issue through your processes. The environment is the primary concern.

Personally, I would love to see a redeveloped mall with retail below and residences above. How many residences is the big question. Much more discussion is warranted around this point before making any moves.

I very much wish to see our tax base expanded and the mall provides great potential for this. I do not wish to see our city subsumed by either Kenmore or Shoreline, therefore, careful redevelopment of the mall and careful new commercial development are needed toward this end.

FYI, my concern and my family involvement in Lake Forest Park goes back to its inception as Ole Hanson was my maternal grandfather. I have the deepest roots in this community of anyone who lives in LFP and I take all of this very personally.

Thanks,

Tony Holman

January 26, 2019

DEIS for Town Center Vision

Dear Sir:

We would like to express our very real concern for the adoption of the maximum density plan being considered for the renovation of Town Center. I attended the DEIS exhibit held at the Lake Forest Park Farmers Market, and I wasn't thrilled with any of them. I do accept the fact that changes are necessary for future growth, but the third option was particularly egregious.

We have lived in Lake Forest Park for more than 45 years because we love the basic attributes it provides. Convenient location, access to beautiful parks and recreation, reasonable-sized residential lots, quality schools, and an exceptional quality of life. It is quiet, safe, and has the feel of a small city outside of the hustle-bustle of the urban city. When we both retired and felt we needed to relocate, we found there was no where else that we wanted to live, so we tore the house down that we had lived in for over 40 years and built a brand new one on the same lot, with the idea we could age in place and continue enjoying the advantages this location offers.

We do realize that progress is necessary, but it should not erode the quality of life that we now enjoy. Already, we have problems with non-residents using our neighborhood streets to bypass the traffic on SR 522 caused by other major highway decisions. I have given up walking in our neighborhood during certain hours because of this extra traffic; and it is not only school traffic, because it continues during school vacations and through the summer months. I have waited for more than five minutes trying to navigate northbound on 37th Ave NE while non-resident commuters heading southbound took up the only navigable space between parked cars. The same is true on 15th Ave NE during morning and evening commute times. Additionally, with the current businesses at Town Center now, parking is often unavailable close to the building. Eliminating parking in favor of high-rises will make shopping at Lake Forest Park even more difficult.

I know that many people have taken part in the visioning, but my sense is that what is being proposed is not what residents visioned, and I would urge the Council to put the brakes on changing the codes to add total density to the town center without further consideration to the impact on the infrastructure and environment and the desires of the residents who pay a premium to live here.

Sincerely,

Nellie Ann Mills

January 26, 2019

Comments on Town Center DEIS

Dear Steve, the Mayor and City Council of Lake Forest Park, and fellow citizens,

I'm writing to express comments on the Town Center DEIS. I'm writing as a resident of Lake Forest Park, and as someone who has professional experience in retail development economics and planning. While at Economics Research Associates I performed the market research and feasibility study for a successful 25-acre retail development, The Grove at the historic Farmer's Market in Los Angeles (developed by Caruso), including consulting on traffic planning, use-mix, and strategies for integrating the new project with the sensitive and historic Farmer's Market, an important landmark and community resource. I performed similar work on other projects nationwide and was a contributing author to an Urban Land Institute book on development. I also own commerce real estate in Seattle's University District and have an understanding of the point of view of commercial property owners and developers. I have a degree in Environmental Design from the University of California, Davis.

My opinions follow:

THE PROCESS 1: The City and the Citizens

The reason we are currently reviewing the Town Center DEIS is because an externality has impacted our community with ST3 and the parking garage. If ST3 had not occurred, I do not believe we would be currently looking at these land-use, zoning, code changes (called just "code" changes hereafter). When I go to civic meetings for this project and I hear our local politicians and consultants say to the citizens that we citizens "want" changes at the Town Center, I cry foul. What I have seen in these meetings and processes is that the city/consultants begun by saying: "IF the Town Center is re-developed, what would like to see?" They told us to be crazy, dream big, share all our ideas. Naturally, all manner of desires were expressed: plazas, green-space, great retail...etc. Then, what I have seen is the city/consultants turn that back on the citizens in subsequent meetings where the citizens are told "If you WANT the amazing Town Center of your imagination, we need to revised the codes, etc. That feels very manipulative to me.

The city/consultants seem to be pretending that there was a spontaneous uprising of the citizens demanding an improved Town Center, out of the blue. That's not what happened. This entire exercise the past couple of years has been driven by ST3 and the city/consultants that see this as an opportunity to realize their agenda--to urbanize the heart of Lake Forest Park. They have used the "theater" of public meetings etc. to move toward exactly what the city/consultants have wanted all along.

THE PROCESS 2: The City as Negotiators

The city is considering rezoning etc. that will result in millions of dollars in instant equity for MGP. The property is worth X before the rezone, then will be worth substantially more than X the day after. Whatever time the city has spent talking with MGP, if it has, seems pointless as MGP is likely to "flip" the property and cash out that instant paper windfall without ever bringing a shovel to the site (has the city not noticed that MGP shows up at the meetings but has never said anything about what they hope or plan to do?). Wouldn't it be more credible if MGP at least hired an architectural planning firm to paint a few pretty pictures? MGP has literally not spent anything to even pretend they will improve the Town Center. Meanwhile, the city plows forward with a huge unilateral give-away.

The city mistakingly seems to think we need to change the codes first, then MGP will propose a development. It should be the opposite. MGP should propose a wonderful development (in conceptual, programmatic form) that we all fall in love with -- dependent on code changes they are asking for. That would put MGP in the position of having to woo us rather than us bending backward for them -- without them even asking. The city could require certain amenities that are critically needed such as a grocery store, pharmacy, bank, perhaps a public pool, and others. The city is failing to take advantage of it's leverage -- leverage it has now in January of 2019 and -- after the next vote -- will never have again.

THE PROCESS: Why So Fast?

Why is this going so fast? It's hard not to be suspicious about the urgency of proceedings. The city is not allowing the citizens adequate time to absorb, discuss, consider, organize, and respond to the DEIS. Remember, the Town Center has been largely unchanged for decades, there is no problem leaving it unchanged for a few months or even years while we plot out the future of our city. The imposition of urgency by ST3 is totally unnecessary and fabricated. Sound Transit can take MGP property for the parking garage using whatever authority it has and the city can work with Sound Transit to execute that requirement without changes to any other codes, etc. There is no necessary connection between these dynamics, at least none have been articulated to the citizens.

THE SUBSTANCE OF THE DEIS

The commercial property I own in Seattle's University District is on Roosevelt Way, a 10-minute walk to two future Light Rail stations and a world class university, and a straight biking path away from South Lake Union and downtown Seattle. When the city re-zoned the University District they did NOT increase the height limits on my property to what LFP is considering for the Town Center. I mention this as context to how inappropriate the height limits of the DEIS alternatives are. Not only inappropriate, but unnecessary. All over Seattle, for over a decade, multi-family housing has been constructed at heights lower than the DEIS heights and apparently these developments provide a totally adequate return on investment for the developers. As one example, look at the Corydon (5105 25th Avenue NE), ground floor retail and two floors of residences. My point is that there is absolutely no need to gift MGP the instant-windfall in equity that comes with raising height limits to "attract" development. MGP is a sophisticated real estate development company and they knew exactly what they were buying when they acquired the property. If they couldn't envision making money on that property under the code scheme

during which they bought it, they never would have bought it. The city is going to hand them millions of dollars in instant equity, and MLG has done absolutely nothing to earn it.

In addition to the height limits being out of scale, the number of additional housing units is as well. In a city of around 5,000 households, how can the city think 1,500 additional households in one development could be a reasonable way to manage growth? It should not even be under consideration. Yes, many citizens have voiced a desire for affordable housing in LFP. This does not mean "more is better" in terms of impact on all citizens and the function and livability of our city as a whole.

CONCLUSION

As far as I know, nobody is asking the city for changes to the codes. MGP does not seem to be asking. The citizens didn't rise up and ask for changes, suddenly. The city is pursuing this unilaterally, and at a reckless pace. For all the meetings and "process" I am not convinced the city council actually care what the current residents of Lake Forest Park think. I respectfully challenge the city to conduct a valid vote or poll of the citizens on this issue and demonstrate it has the citizen's support (the poll should NOT be designed by the city or its project consultants but rather by an impartial entity). This is the most important and impactful city action to be considered in our city, in our lives. The historical memory of this event and the politicians involved will be aided by demonstration of the citizen's support.

Finally, I apologize if there are any factual errors or misleading statements in this letter and I deserve to be corrected if so, please contact me.

Thank you,

Jay Wheatley

January 26, 2019

LFP Town Center Upzoning

Hello,

I have lived in LFP since 1992 and care very much about the future of our Town Center. Like most everyone who spoke at the recent meeting, I am strongly opposed to the 1200 and 1500 unit plans.

Furthermore, the 700 unit plan was poorly represented, and there was no representation of mother-in-law up zoning such that homeowners could build cottages on smaller parcels than currently allowed.

I am concerned about the lack of transparency regarding the process. The City Planning Committee and the Vision plan were bypassed. The citizens will have been bypassed if you as a council member vote to give away zoning in exchange for development we do not want!

Please put the up zoning to a vote to the entire citizenry of LFP. That is the only fair thing to do.

Jan Silver

January 26, 2019

From Tony Angell: Regarding proposed redevelopment LFP Town Center

To: Steve Bennett
c/o LFP City Council
Lake Forest Park, WA

From: Tony Angell
Lee Rolfe
18237 40th. Ave. N.e.
Lake Forest Park, WA

Re: Proposed development of LFP Town Center

As a resident of Lake Forest Park for nearly half a century, I have some perspective on the unique environment our community possesses, has sustained and stewards. Our choice of zoning allowing relatively uncrowded spacing of the residences, the degree natural amenities and heritage has been planned into life here makes this an extraordinarily unique location to live. It has not come without thoughtful planning and citizen vigilance. Over that span of time we have elected responsible leaders who thoughtfully championed our history here and an active body of resident individuals who step up knowledgeably and speak out and take action that will protect our living environment. The people have worked diligently, with and without monetary compensation to protect the heritage of Lake Forest Park.

The proposed plans to expand the Town Center to proportions that are way beyond the scale of what currently exists and serves our home is not only out of sync with what the residents expect and need but frankly absurd. These proposals seem to be advanced by individuals who not only fail to understand our interest in sustaining the comfortable living climate here, but wish to exploit the Center properties for their sole interests.

Increasing the floor level of buildings not only creates deep shaded canyons of concrete and glass, but would destroy the clear exposure to open sky, tree line and expanse of view over Lake Washington. While planning should be directed toward encouraging the reduction of automobile traffic and enhancing the pedestrian access to the Center these plans echo what Bothell has become and will produce yet another bottle neck for movement along Lake City and Bothell Way and creating a confusing collection of passage ways and corridors.

A few years I volunteered my time when the public was invited to contribute ideas for the future of Lake Forest Park. Meeting at LFP elementary School the vast majority of the public participants agreed that sustaining the existing environment of the community in general was of significant importance. At that time, the Town Center was celebrated for its existing contribution in fostering the very livable conditions we enjoy here. Your proposed plan, only now reaching the light of day for public scrutiny, seems to be oblivious and indifferent to those strong recommendations made at that time. Was our meetings simply a strategy to bleed off public energy and then proceed in secret? I say this as someone who as remained active in voicing my concerns about the Lake Forest Park environment and yet knew nothing of these dramatic building proposals.

That the public recommendations seem to have been left out of the plan itself is frankly a gross neglect of duty and responsibility. As mentioned above, our community has a long history of providing wise and articulate ideas and concepts through both individual testimony and group action. Our network of parks and trails is but one indication of this commitment. The protection of our watershed and restoration of our two creek sheds is yet another. We cannot be indifferent to this vital engagement and I strongly recommend that these concerns be heeded and thoughtful reconsideration and review of this project and its options be initiated.

With Respect and Commitment to Sustaining the Environmental Quality of our City,

Tony Angell

January 27, 2019

Towne Centre Redevelopment

We have resided in Lake Forest Park since 1992.

We have always appreciated the bucolic nature of our town. The Towne Centre is a vital resource. The current redevelopment plans are not consistent with the soul of LFP. A high density development is not appropriate. A multistory complex would overwhelm the roadways, parking and would be a huge eyesore.

Please do not pass any of the current proposals. It is NOT what the citizens of our community. The only benefit would be that the developers could get richer.

Mark Silver

January 27, 2019

Town Center Option 1: YES! Options 2 & 3, NO!

To Steve and the City of Lake Forest Park City Council:

I attended the recent meeting at City Hall to discuss Options 1, 2, & 3.

By the end of the meeting, I found myself overwhelmingly supporting Option 1, marked as "As Is." It is my understanding that, "As Is," translates to keeping the current zoning, with potential exceptions for Sound Transit. The term, "As Is," seems misleading as the Town Center is not built up to the full height allowed under the current zoning.

Options 2 & 3, are too focused on residential development at the Town Center. More consideration should be given to supporting residential development within the neighborhoods: allowing mother-in-law apartments, secondary dwellings on large parcels, and town houses within the neighborhoods. The current thinking, lumps all the residential redevelopment into the Town Center. This is not desirable.

Both Options 2 and 3 propose to significantly redevelop the town square into Condominium and Apartment High Rises: approximately 65' to 75' in height, massive in girth, creating a huge shadow footprint at ground level (most of the year) with minimal community gathering space, green open space or sense of place. Also, parking is limited for those who will not live at the Town Center.

The interests of the proposed new communities, including up to 1,500 new residents, are in direct opposition to the interests of the current residents of Lake Forest Park, who view the Town Center as their Community Hub, where they can leisurely drive, park, and shop, and attend a variety of community oriented programs at the Commons throughout the week and weekends.

Options 2 & 3, propose to create a very different vision for Lake Forest Park. Our town center, becomes a residential hub, similar to the large-scale apartment complexes appearing along Lake City Way, cramped into tight spaces without providing significant amenities, parks or a sense of place for residents. There is no "heart" to Lake City. There is no sense of place. Let's not bring this short-sided planning to Lake Forest Park!

The idea to place the community commons on top of the Sound Transit Parking Garage is misguided. (Perhaps I misunderstood this, but it seems that the community should be held

Options 2 & 3, are focused on residential housing, at the expense of everything else. Option 2's "festival street" culminating in a small plaza next to City Hall, is too little amenity for such a large development, especially when this small strip of community open space is intended to serve the entire town!

This seems misguided. Both Options 2 & 3 appear as Developer Land Grabs, best for business profits, worst for the current residents of Lake Forest Park, not to mention who pays for Lake Forest Park's upgraded infrastructure needs to support 1,500 new residents: sewage, water, schools, etc...

From the discussions at the town meeting, OTAK did not weight the Town Center/Community Task Force recommendations in their Options: 1, 2 or 3. According to Task Force members, OTAK, ignored their report. Why?

The rushed approach to passing these new zoning guidelines is misguided as well. There needs to be a lot more discussion about the future of our town and how it will affect all its residents. What is the big picture?

The big picture that I saw at the town meeting is dismal. I was disappointed that Option 1 was not more developed visually, and that the citizens were guided to picking Option 2 or 3 by default, by the presenters.

Those community members who spoke are overwhelming against OTAK's Options 2 & 3. Now, oo am I.

The only part of the OTAK Study, I fully appreciated, was the moving of the Sound Transit Parking Garage further to the back of Lake Forest park, behind the new "City Hall."

I do not want Lake Forest Parks' identity to be Sound Transit's massive parking structure. It should not be front and center, the first building one sees when entering the Town Center. We are more than a Sound Transit Commuter Community. Please do not short sell us and obliterate our identity by letting Sound Transit define us!

I hope this information is helpful.

Best,
Vicki

Below: Redevelopment in Bothell, WA: This density of housing is not appropriate for Lake Forest Park Town Center. Our overall footprint, 3.9 acres, is too small to afford such large structures, tightly packed, creating canyons of shadows throughout the year. We do not have the same "open space" footprint to mitigate the canyons created by large-scale residential or mixed-use development as shown in Bothell.



January 27, 2019

Regarding zoning changes.

Steve: I am not in favor of the recent proposals to densify the lake forest park town center. One of the reasons I moved here was because it has a small community feel to it. There are no 8 story buildings and congestion is tolerable. These changes would change all that. I will be one of the first ones to leave here after I retire in 6 years. Don't turn this place into a mix of low income housing projects and congestion that makes living here miserable. Thanks,

Chris E. St.Luise
16875 Shore Dr NE

January 27, 2019

LFP Rezoning

Mr. Bennett,

Thank you for hosting our recent town meeting regarding the potential rezoning of LFP Town Center. It was a large crowd reflecting how important this issue is to the residents.

I was born and raised in LFP and remember the Town Center site before it was developed. Catching frogs was wonderful but the new center has brought us a fabulous social gathering and shopping place.

Knowing this area was a wetland and that the size of the mall would never be allowed today, one of my big concerns is drainage. Our home has been flooded twice. The prior work on the drainage system has helped but with higher density of development, that could change.

I just can't imagine a 7 or 8 story building on the LFP site. The plans for the U District building height are much less with higher population density and a ST3 station. Can't we reduce the height of the zoned buildings?

A realize the Vision Plan was not a legal document but why wasn't it followed closer than what the two new plans are providing? Everything was increased significantly from three times the housing units to building height and footprint coverage.

If ST3 or others are pressuring the city for a higher density development cant we agree to the garage with other requirements? We can then take the time to properly decide on the mall rezoning. Why does this have to be pushed through without proper review and community involvement?

My vote would be to keep the existing zoning and not up-zone the site at this time. I believe this is much too large of a development for the area in regards to traffic and pure aesthetics. Your consideration and understanding of the residents is greatly appreciated. Thank you.

Terry Smith

Second correspondence from Terry Smith, received January 27, 2019:

LFP Town Center Up-Zoning

Dear Council Members,

Thank you for the job that you all do. I am sure it is very time consuming, a lot of work and stressful at times.

Your devotion and concern for our great city is recognized and appreciated.

I was born and raised in LFP and remember the Town Center site before it was developed. Catching frogs was wonderful but the new Center brought us a fabulous social gathering and shopping place.

Knowing this area was a wetland and that the size of the mall would never be allowed today, one of my big concerns is drainage. Our home has been flooded twice. The prior work on the drainage system has helped but with higher density of development, that could change.

I just can't imagine a 7 or 8 story building on the LFP site. The plans for the U District building height are much less with higher population density and a ST3 station. Can't we reduce the height of the zoned buildings?

Am I realize the Vision Plan was not a legal document but why wasn't it followed closer than what the two new plans are providing? Everything was increased significantly from three times the housing units to building height and footprint coverage.

If ST3 or others are pressuring the city for a higher density development can't we agree to the garage with other requirements? We can then take the time to properly decide on the mall rezoning. Why does this have to be pushed through without proper review and community involvement?

My vote would be to keep the existing zoning and not up-zone the site at this time. I believe this is much too large of a development for the area in regards to traffic and pure aesthetics. Your consideration and understanding of the residents is greatly appreciated. Thank you.

Terry Smith

January 27, 2019

Town Center Proposed Development

Hi Steve –

I am one of many who are very concerned about the size and scope of the three Town Center development proposals under consideration. Due to the magnitude, this project requires extensive and careful scrutiny of numerous forms of impact. Please do not allow your department or council to be rushed into permitting something that could easily harm the quality of life in our community with unintended consequences.

Thank you for you the work you and your team do to make LFP such a special oasis in the Seattle metroplex.

Best personal regards - HJ

Howard A Johnson

January 27, 2019

Towne Center

I am not in any way supportive of 1500 new units being built at the Towne Center. This process must be slowed down for everyone to understand the implications of these actions that can irrevocably change the community center of Lake Forest Park. I am also very disturbed that none of the visioning plans that were developed with neighbors were adopted or it seems even considered.

Stop this madness.

Michele Hausman

January 27, 2019

Town Center Plans

I fear that the plans will make LFP look like Bothell. I hope that is not the case. I am not against increasing density. But it should be a moderate change. Bothell underwent a radical change and it is not lovely. Whatever you do, make sure the bookstore can stay. (Third Place Books)

I could not tell from your website where the Sound Transit parking garage will be sited. I have never seen a good looking parking garage and really dread this development.

If apartments or condos are built, I hope there are a substantial number that are "affordable". At least 50%. I doubt that is possible, especially since any south facing apartments will have views of Mt. Rainier. But please try.

Thanks,

Eileen O'Keeffe

January 27, 2019

Feedback on Town Center Development Plans

Steve,

As residents of Sheridan Heights for over 22 years, we attended the public meeting on Jan 16 describing the various options for redeveloping Town Center.

We favor the least ambitious redevelopment option, Alternative #1, although this plan's projected addition of up to 700 new residential units seems absurdly too many, especially given the size of the Mall and already-at-times congested traffic and scarce parking (even with a planned new garage). Our most important priorities are:

- preserving Third Place Books in its easily accessible current location. This store and Commons has become and heart and soul of our community

- limiting the number of new residential units (700 seems excessive; we don't understand how the mall can provide parking for this many new residents, several hundred new commuters, as well as neighbors; as mentioned above, neighbors already have difficulty finding parking at times).
- attention to improving parking and traffic, which already is congested many times during the week.

We would like another public meeting before anything is finalized.

Thank you for letting us comment.

Steve McGee and Rosalie O'Leary

January 27, 2019

Re: zoning changes to LFP Town Center

Dear Steve,

Our family live in LFP on 39th Ave NE and we either walk or drive to the Town Center almost every day. We strongly feel that the new zoning proposals for the Town Center will change the character of LFP and take away the charm and community feel it offers. We stand in unity with those in the community that want to preserve the winsome community appeal of the Town Center. Thank you for considering this appeal.

Sincerely,

Drs. Thanh and Jim Kirkpatrick

January 27, 2019

Town Center Development

Hi Steve - My husband and I moved to LFP six years ago. Since joining this community we have had two children join our family. We enjoy our walks down to the town center where we can run into neighbors or the friends we have made during our time here. What is important to us is that LFP keeps that tight sense of community. It is a really unique area in the sense that it has really kept that suburbia feel even though it is very close to the city. We are not opposed to adding a few condos/appts to the town center area, but seven stories of condos feels extreme and really risks losing that close knit community look and feel that we have all grown to love. We hope to stay in the area to raise our two small children, but a large influx in traffic and reduction in community space may deter us. Please keep the families in mind who have invested the time to build a sense of community in LFP when determining next steps for the town center redevelopment.

Thanks,

Kellie

January 27, 2019 12:04 PM

LFP plans—522 bus line

I use the 522 bus from 153rd on Bothell Way to downtown almost daily. Please DO NOT change the route to go to Northgate. That would add additional time to my commute and require additional walking which I cannot due at my age Thank you Kathy Collins Lake Forest Park resident

Kathy Collins

January 27, 2019

Town Center

I am in favor of Option 1 for LFP Town Center, whereby there would be no change in the zoning code.

The Town Center has become a gathering place for the citizens of LFP. If Third Place Books and the LFP Common Area were eliminated, it would be a travesty for our community. And all of the small businesses, Sunday Market, restaurants are so appreciated. We identify as a small city. I encourage keeping our City as-is as much as possible.

In the other options, why would every square foot of Town Center be set aside for housing? Why the rush? These are huge decisions that will forever change the fabric of the City of Lake Forest Park.

Thank you for your consideration.
Sylvia Rasmussen

January 28, 2019

City zoning changes
Mr. Steve Bennett and City Council Members;

I have grave concerns about the zoning changes you are considering. I am 48 years old and I have lived in LFP for most of my life. I have also lived in Seattle as well as Lynnwood and Bothell. However, I chose to come back to LFP because of this wonderful small community feel and excellent schools.

We DO NOT have the capacity to increase the population that would be made possible by this change without causing traffic congestion and over crowding our schools.

Please don't let this happen!!!

Save our small city,

Michele Libby

January 28, 2019

Lake Forest Park Development

Hello Mr. Bennett and Lake Forest Park city counsel

I write to you to urge you to reconsider the zoning changing that would authorize 1,500 apartment units being built in the LFP town center. I grew up in Lake Forest Park and also bought my first home in Lake Forest Park. Last year, when the Town Center and Bothell Way plans were initially being discussed my family was so alarmed that we put our beloved home for sale and promptly moved to Bainbridge Island. Looking at this new zoning changes, I know we made the right call. I share my story with you just so you are aware that people who love Lake Forest Park are fleeing.

It breaks my heart that Lake Forest Park is changing to be such a urban center instead of the safe suburb where I grew up. As you are aware, petty crime is on the rise. Our cars were broken into several times in 2017 and 2018. I know we can not change the fact that Seattle is growing, but increasing the population by 50% in one small area will drastically change Lake Forest Park, and not for the better. Please protect our neighborhood. Please consider the impact this zoning change will have on the community.

Thank you,

Heather Tartar (maiden name Heather Bugni)

January 28, 2019

Town center Proposal STOP 

Hello council

As a homeowner in Sheridan Beach I'm very concerned with the future building code changes and the potential redevelopment of the LFP Town Center.

Here is my main concern.

Crime rate will go up! Does the LFP police dept have a plan for this? The parking structure will attract the homeless, and invite more criminals to the area due the attractiveness of unattended parked vehicles. If the new development includes section 8 units, that will also attract criminals, who most likely will visit our neighborhood and others near by. Does the council have any plan for this?

This development will ultimately damage this area and the surrounding neighborhoods in a negative way, the increased crime rate will be just one facet. Why must we bow to the sound transit and other entities that make there way through? SAVE THIS Community! Don't let this happen, it will have long term damaging effects to our community!!

Tony
Sheridan Beach Homeowner

January 28, 2019

LFP Town Center Proposed Development

Steve,

I have been following the rapid process of the proposed redevelopment of Lake Forest Park Town Center and it is alarming to those of us that live in the neighborhood and call this town our home. In my professional experience, the deadlines that have been set are inconsistent with development that would impact a community to this extent.

The scope of the project is beyond comprehension with potential to build up to 1500 units. The traffic alone is a major factor. In December I had to park at City Hall to buy groceries at Albertsons. We already have parking issues in our neighborhood due to commuters that ride the bus from Starbucks or park and ride bikes to work. Given the number of units proposed and in turn multiple vehicles belonging to those residents there will never be enough parking in Lake Forest Park at or near the center.

I hope that you are taking into consideration several important factors that will affect our community including, but not limited to: green development with less concrete, protecting our environment, maintaining and increasing both common and open space. Sheridan Beach residents have always worked at being good neighbors and supporting our local LFP Town Center. Hopefully everyone realizes this and we can continue that relationship going forward while voicing our concerns over the proposed project.

I thank you and your team for your civic duty along with your efforts put forth in resolving this issue for the future benefit of all.

Sincerely,

Nancy Johnson

January 28, 2019

In support of the up zoning LFP

Hi,

I am a property owner in Sherjan Beach and I would like to convey my support for the more housing opportunities inside the LFP shopping center.

With growing population in Seattle and it's surrounding area, there is a need for more housing and, I much prefer to see growth occurs within the already available footprint. Meaning, I am in support of density (vertical housing) over clearing forest land for housing development.

So many highly populated cities around the world live in densely developed environment and do so with much vitality and vigor. There will be some growing pains and some people may not like any changes, but I feel these are some of the necessary changes we have to embrace as we go into the future. Only thing I would like to see occurs is that the up zoning is well thought out so the Town Center is a vibrant gathering place for all.

Thank you.

Suni Davies

January 28, 2019

Master Plan for LFP Shopping Center

We would like to voice our dismay over the three plans presented for review for the upcoming development for Lake Forest Park Shopping Center. We had been aware that there were plans in the future to include housing on the upper side of the development. We thought that there might be somewhere between 100-200 housing units proposed, with a possible three story development. Imagine our dismay when we found the *minimum* planned by the council and planning committee was adding 700 housing units! Plan #3 proposed 1500 units, which could represent up to 3000+ people. That's almost a 25% increase in population, since there are approximately 13,500 residents in Lake Forest Park.

How do you think you would be able to accommodate all these units and parking with only one level of underground parking planned for the development??? We understand that there is a plan for a 300+ parking lot where the city hall parking lot is now. Is that only for commuters? Where will the local shoppers park when commuters think they can park in any surface lots? Will that be overflow for apartment parking, since you have not planned for adequate parking? Not everyone in the new development will be planning on busing to light rail. We feel that the City of Seattle and other new developments in neighboring towns do not adequately plan for parking realities. In a two person household, especially in the suburbs, there will probably always be at least one car per household.

One of the reasons that Lake Forest Park is such an great community is the small size, low growth, and NO sprawling developments! There are many days it is hard to park at the mall, and to get out into traffic. How do you possibly think adding that many households would be feasible? This is NOT Seattle. Lets keep the charm and beauty of our city, and not become a sprawling suburb.

Please be aware that everyone we have spoken to in the neighborhood agree that the plans presented would ruin the quality of our vibrant Lake Forest Park. We are not opposed to new restaurants, shops, and remodeling the mall, but are very opposed to the housing planned in Option 1, 2, and 3. We hope that you would reconsider the view of those opposed, and drastically reduce the size of the three housing developments proposed, and keep Lake Forest Park a community we can all be proud to live in.

We are absolutely against all plans presented, and think the planning commission needs to go back to the drawing table and develop a plan that keeps the integrity of the neighborhood and the shopping

center. We want to keep a vibrant center with shopping, library, medical, local farmers markets, and parking that is easily accessible, and keep our community center in Third Place!! DO NOT TEAR DOWN THE ENTIRE MALL AND MAKE IT A MASS PLANNED COMMUNITY.

Sincerely
Doug and Sherri Woods

January 28, 2019

Comment on Town Center DEIS

To Whom It May Concern:

I am a resident of Lake Forest Park and attended and spoke at the DEIS meeting on January 16. While I am generally in favor of redevelopment and do think that all 3 alternatives would be reasonable growth targets over the next few decades, I wanted to include some additional thoughts and details. Apologies if some of this is beyond the scope of a DEIS.

First, I think it is important for there to be a big picture analysis of the region. For instance, how is the population growing outside of Lake Forest Park? Have other nearby cities recently completed upzones themselves that would increase transportation use along SR 522 and 104. Understanding how other local suburbs are changing will be useful when considering what changes might be made for Lake Forest Park. While I'm not certain, it does appear that Lake Forest Park is currently growing substantially slower than our neighbors.

Second, what is the relationship between the zoning code and developers. A number of speakers at the 1/16 meeting seemed to feel that zoning changes shouldn't be made unless the current Town Center owners requested them, i.e. if Merlone Geier was happy with the current property, then there was no need for the city council to even be proposing a change. It would be helpful to clarify this relationship. For instance, if Merlone Geier declined to develop the property in accordance with current or modified standards, would another developer that was interested in redevelopment be able to "outbid" them for control of the property? Or put another way, who is responsible for choosing the actual redevelopment details?

Third, related to the traffic analysis it would be helpful to know what assumptions were made. For instance, did the analysis include expected population growth in Kenmore, Bothell, etc. that would be driving along SR522 to commute to Seattle? Did the analysis include likely changes from ST3 - more traffic commuting to Shoreline 145th St Station and/or the new park and ride facility at the Town Center? It is challenging to interpret the results of which intersections will be worsened without knowing whether these changes are because of the proposed redevelopment or because of external factors beyond direct control. That would help to put in context how severe the effects are from the development itself.

Fourth, I think it is helpful to contextualize any changes to Lake Forest Park Town Center within the city as a whole. How would this redevelopment growth change the density, tree canopy, open space etc. of the city as a whole, not just the town center region. Related to that, how would these green factors change if the redevelopment was spread out, for instance 700 new housing units spread evenly around the whole city rather than concentrated in the town center? Informally, it seems to me that concentrating the growth in 1 geographic area will allow for the maximum retention of open space and tree canopy.

Thank you for your attention to these matters.
Have a nice day.
Lawrence Goldman

P.S. The YourLFP website says "All comments must be received by midnight February 1, 2019" However this is unclear if midnight on 2/1 refers to the beginning of Friday or the end of Friday. If it's the beginning of Friday, I wouldn't want residents to not have their comments heard because they misinterpreted the word "midnight"

January 28, 2019

DEIS

More detailed publicity is needed and more ways to notify residences about the plans like snail mail to all residences; sending out details on Chief Sutton's email list; better publicity for public meetings that give a good overview of the DEIS and not just a lot of boring technical data. Make it consumer friendly. Pending more information this sounds to me like a developer driven initiative. Likely in many ways not beneficial to existing LFP residents. In many shopping centers an updating of their existing model in order to survive may be necessary: look at Northgate's move toward mixed usage tenants(tho we don't need an ice arena). But to bring in housing to accommodate 1500 households is absolutely unacceptable. Even 150 units may have social and environmental concerns. Give more well publicized time to comment. Lacking good, innovative and thorough efforts to contact residences using Feb 1 as the comment period gives this proposal to the advantage of one group. Keeping a commercial center in the plans is vital.

It is bad enough that the 800# gorilla in our midst is forcing us to provide space for a parking garage. Where? On LFP Towne Center property? Sound Transit tells us how some land is to be used and we have little choice. But we have a choice here. Very limited housing with negligible effect on traffic, schools and the environment.

Sincerely, Bob Wells, 33 year LFP resident

Second correspondence from Mr. Wells:

January 30, 2019 10:20 PM

Re: DEIS

Dear Mr. Bennett:

I've had contact with Shary Van who with concerned neighbors got tonight's open house organized out of concern for the things I was- big development plans without much outreach to the residents. She, too, said the city has not made the effort through emails, snail mail and other means to let all citizens know about the development plan at TC. So they organized this short notice open house in response to I believe was a Committee of the Whole meeting on Mon. I talked to two senior citizen residents who also were the totally unaware of what people are doing at City Hall. I am a Blockwatch Captain and have been a Parks volunteer at Lyon Creek Park in the past. So I am a resident who is willing to contribute.

Thank god Shary and her neighbors took some action to inform us more about it. It is mind boggling that you guys would consider up to a 1500 unit residential development with very little outreach. As is so often the case developers really have the upper hand over residents.
No to 1500 units at TC.

Thanks for listening. Hope you do outreach better and then extend the comment period.

Bob Wells

January 28, 2019

Town Center DEIS

Thank you for the opportunity to read (in its entirety), ponder, and comment upon the 200-plus page Draft Environmental Impact Statement regarding code changes for future redevelopment of the LFP Town Center.

I will try to be brief and tell you why, when I studied the re-development display at the 2018 Farmers Market, not even the free artisan chocolate could ease my dismay.

Lake Forest Park is a unique city.

So is Town Center. No other center in the area provides such a glorious combination of retail, nature observation, social, cultural and intellectual opportunities within one walkable location.

Scale matters. It encourages human interactions that draw people who don't even live in LFP to the Town Center. It nurtures small businesses. It allows the natural world to surround Town Center and cup the entire place in its hands.

Lyon Creek, McAleer Creek, and the view lines to the Lake matter. They are critical to the ambience and spiritual undertones of Town Center. They have galvanized people into amazing achievements like the Lyon Creek storm mitigation project and the purchase of the former Morris property at 17337 Beach Drive to create the Lake Forest Park's only park on the Lake.

I am disappointed at the dismissive tone the DEIS uses toward Streamkeepers, the Stewardship Foundation, and other volunteers who do so much to get grants, help form financial partnerships that stretch the City's money, and through it all, literally get down on their hands and knees to maintain what they have achieved. Their work matters.

Large scale construction activities are never beneficial for established wildlife habitat. A rare exception might be Thornton Place (south of Seattle's Northgate), which replaced an under-utilized parking lot and daylighted a section of creek that had been in a pipe.

I was disappointed to learn that current stormwater runoff from Town Center discharges into Lyon Creek and Lake Washington. The rain garden by Bank of America is a step in a better direction that Alternatives 2 and 3 appear to negate.

Section 4.1's use of the verb "leverage" makes me uncomfortable. Although perhaps the developers could leverage \$5.5 million to purchase [17345-17347](#) Beach Drive Northeast and give LFP a second park on the Lake...

Regarding pedestrians: people do not like to walk alongside a highway OR share a path with bicyclists. Please provide buffers from both. This especially applies to people walking with children or dogs.

Plan for dogs. "Revitalized" Urban Seattle has many more dogs than children. Kenmore is trending anti-dog...now there's a niche market for Lake Forest Park.

I'll let others quantify the unfairness of local and regional taxpayers footing the bill for increased utility infrastructure, library services, etc.

Thornton Place replaced a parking lot and improved a watershed.

Much of Bothell's downtown 527 development occurred on property left behind by the Northshore School District. The heights there are out of scale, relieved somewhat by the haven that is McMenamin's.

The City of Shoreline is geographically vast enough to provide things to many people. (Who needs a full service post office, right?)

Kenmore is...Kenmore.

This plan could destroy something unique and irreplaceable.

Please don't be hasty. Separate the deadline from the Transit stuff.

And now I must go meet friends at 3rd Place. They do not live in LFP. Town Center draws them there.

Thank you for your consideration.

Laurie Feetham

January 27, 2019

LFP Town Center Redevelopment

To whom it may concern:

My husband and I have lived in the Sheridan Beach neighborhood since we were small children in the 1950s. We are very fond of the city of Lake Forest Park and value the quality of life, serenity and safety that families experience living here. Though many changes have occurred in the past 60+ years (the worst being traffic on 522), none have the potential to impact us as negatively as we believe this proposal will effect our city. We believe that the high density urbanization being proposed will greatly reduce the quality of day to day life here. There will be insoluble gridlock traffic, increased crime & little or no place to park at the mall. We regularly use the 522 bus to go downtown and it can be very crowded or completely full, at present, at peak times. We fear that the extra population will create the inability to ride the bus because it will fill up. Finally, we have had a severe flooding problem from stormwater and raw sewage in the near past, in Sheridan Beach, Lake Forest Park Mall and surrounding properties that was temporarily resolved with the Brightwater sewage treatment plant. The development in land use and an

increase in density of population was a significant contributor to this situation and will only get worse with the proposals. We can only assume that high density and increased use of sewers will impact the system's ability to process it. Please reconsider the proposals. We love Lake Forest Park because it seems like a wooded park. We have talked to many of our neighbors and they are united in opposing the plans as they exist but feel unheard, steamrolled and marginalized. Please don't turn LFP into another Lake City.

Sincerely,

Linda Olson

Bruce Olson

January 29, 2019

URGENT: Comments Opposing 1,500 New Units at Town Center

Dear City Council and Mr. Bennett,

Please note I write this to express my EXTREME CONCERN about the way in which this so-called "process" is unfolding. I attended some of the brainstorming and planning meetings and never heard once numbers like 1,500! For a community of 5,000 homes, increasing by more than 1/5 is irresponsible. Traffic is already an issue and the parking lots are often full at the Town Center. It feels as though all of those initial meetings we all spent so much time attending and participating in were just for show and no one actually listened but were running the meetings to 'say there was a process.'

I am all for growth and development at a responsible rate and was quite excited for the possibilities at Town Center (a community center, childcare center, senior center, new restaurants, etc.), a place where our strong community could gather. What is being proposed now is making our strong community *very upset* and extremely disappointed. There shouldn't be such urgency. PLEASE slow the pace down and run a process where your community gets to VOTE. Isn't that what we should be doing here - giving our real community a VOICE? IN A REAL WAY.

I have lived in Lake Forest Park for nearly all of my life. When I wanted to live in a more developed area as a person not raising kids, with no parking, I lived in Greenlake. I moved back here to raise my family in the community that I so loved growing up in.

Please do not turn our strong, tight-knit, actively engaged community into one that is irate at our local officials and the way things are done TO us rather than WITH us. We need our LOCAL government to do things the RIGHT, HONEST, SMART way.

I appreciate the work you all do and can appreciate it's not possible to make everyone happy all the time. However, I believe it is in the City Council's best interest, and the best interest of our entire community, to halt this hasty decision making and acknowledge that these excessive proposals to rapidly increase growth will do more harm than good to our community.

I would love to have a better understanding of what the rush is and how these decisions were made – all of the opinions I've heard from community members are in stark opposition to this idea.

Thank you for taking the time to read this,

Jenna Hulse
Lake Forest Park Resident 25+ years

January 29, 2019

input on DEIS statement for rezoning of mall - Williams

Mr. Bennett,

Attached is a letter stating our concerns about the proposed rezoning for the Lake Forest Park Mall with our letterhead. For your convenience, I am also pasting it below.

Thank you,

Barb Williams

We are thirty-year residents of Lake Forest Park and live in the Sheridan Beach area. We have strong opposition to both alternative plan 2 and especially plan 3. We appreciate the current livability of our community and love the variety of safe modes of transportation within our community be it to motor vehicles, bicycles, or as pedestrians who frequently move from our home over to the Town Center. We are deeply concerned about the recommendation to build buildings as high as 75 to 85 feet with high population density up to 1500 units of housing.

The original site was a peat bog and the reason Lake Forest Park incorporated was that the mall was developed against the wishes of the surrounding residents. Therefore, LFP was incorporated so we would have better local zoning ability.

It would be our opinion to increase the density would be against the goals of the community for the following reasons.

1. It makes the traffic density increase dramatically and put higher demands on the services of LFP such as parks and open spaces. Meaning, there are very few open spaces available to the public now so how can you increase density to 1500 units?
2. It puts tall visual blight in the middle of the city. Instead of green canopy, we will have blocked sunlight and tall concrete. Instead of Lake Forest Park, we might as well change our name to Lake Cement Park.
3. As stated, the land was previously a bog. Looking at the plans to take away the parking and create below ground parking we think this could cause more water issue such as leaking ground vehicle water into our streams or failure with sump pump issues causing more flooding issues.
4. The parking garage design to attract out of community commuters as a park and ride has a multitude of potential problems with out of control congestion and safety issues our top concern.
5. The intersection of 170th and Bothell Highway will turn into a BIGGER traffic nightmare and safety concern both for cars and pedestrians, not even considering bikes – yikes!
6. Not enough time for both study of these issues and to develop consensus within our community.

PLEASE DO NOT CONSIDER ALTERNATIVE PLAN 2 OR 3!

Sincerely,

Paul and Barbara Williams

<SEE ATTACHED LETTER>

January 29, 2019

Town Center Use Proposals.

Dear Mr. Bennett,

My husband and I have lived in LFP for nearly 14 years and are raising our two boys here, both in the Shoreline School District.

We love it here and love the community. Since we arrived we have felt that Town Center has been underutilized. It is a wonderful space and Third Place Commons adds a great bonus to the community. Adding Mod Pizza and Swirl was great for our kids too.

However, I have serious concerns about overbuilding at Town Center. I have reviewed the proposals. I actually do agree with making some changes to add more mixed use to the space possibly some apartment buildings over store fronts so long as the main character and feel of the area, and LFP, are not at risk. And we don't jeopardize our school system, environment or access to Town Center. IT is our HUB. It is really the core of what makes LFP LFP.

Let's NOT bend to ST3's pressure and completely change the character of LFP. I could live with Proposal 1 and Proposal 2, so long as they account for parking (large enough parking structure/garage etc for both the residents and shoppers and commuters, yet I fear how ugly that will be).

I absolutely despise Proposal 3. Won't look as nice and will be too huge and not fit with the feel of LFP. And adding 1500 families (??6000 people) is a game changer to the community -schools, environment, civic club...).

OF all of them, I prefer Proposal 2, with the varied mixed use structure, and some green space secured (open space provision 2), but am very concerned about building height and still prefer no more than 4 floors of apartments/condos above retail (so 66 feet). (definitely NOT the 85 foot monstrosity).

Impact questions for your team? how will all this extra housing affect our school system, parking, environment, civic club and the attractiveness and community feel of Town Center and LFP in general? Keep our community meeting place with the Commons and don't make it impossible to get there and park in order to go to the Commons.

My kids complain enough about classroom sizes. I really have major concerns about how this development will affect our schools.

THank you for reading.

Julie Mattson

January 29, 2019

Town center

To LFP city official,

The town center needs updating agreed. Our family disapproves is this rushed plan with too many housing units. While I understand housing is an issue there is not a arterial road bypass such as in the newly designed Bothell.

Please stop moving forward with this current plan and do more community research.

- I believe all 3 proposals will negatively impact traffic, density, safety and character of our community, as all 3 proposals have far too many housing units. Coupled with 300+ daily vehicles from ST3, the negative consequences will be high and far-reaching.
 - The consultants implied that 700+ units are necessary to fund redevelopment and the many asks from the community. Not only does this appear to be a gross mischaracterization of what our citizens and task force members asked for, it's short-term thinking that will have significant long-term impact on our community.
 - All 3 of the consultants' proposals appear to be focused on development incentives via revenue generation (short term thinking), versus creating a sustainable, usable, engaging community space for many years into the future. This is not a random development along a busy highway, it's a Town Center which will impact who stays here, and who moves here, for many decades to come. The legacy of the community space we build will shape the economic and cultural future of Lake Forest Park. Making the wrong decisions on traffic and denisty in the short term will create a community far different than the one we have today.
 - The process itself feels terribly rushed; for something so monumental to our community's future I would expect a longer timeline with much more input and discussion.
 - As stated below, I do support redevelopment and modernization of Town Center, including mixed-use development and some level of diversified housing. However, this community deserves a proposal with far fewer units than #1 (700), and with much more of the VISION task force's input included.
- Community member from Sheridan Beach,
Susie Moore

January 30, 2019

Are you really that clueless?

As a lifelong LFP resident, I'm baffled at many of your recent decisions. I don't know what is motivating you all, but I aim to find out. Consider yourselves under forensic scrutiny. I'll be looking to uncover what is motivating you to ignore the people's wishes.

In the meantime, if you don't do the right thing and delay the non-parking garage segment of this fiasco you're trying to ram down our throats, expect two things to happen:

- This will be your last term
- The city will be sued

Having a degree in Urban Studies and working in real estate for the last 30 years, I'm not your average NIMBY. I've been flabbergasted by the council's behavior in many matters as of late and it's got to stop. Either you people are clueless or you stand to gain something from the decisions you're making. We've met growth management requirements and I haven't been able to pull in or out of my driveway for several years without long delays. Do you think adding this much density without increasing infrastructure isn't going to create gridlock and havoc? Or is that in anticipation of some future project where you also stand to benefit?

And if you can't face your citizens in a public forum, why are you on our council?

Sincerely,
CHRIS CLASEN

January 30, 2019

EIS Scoping Comment for Town Center Plan

Dear Steve, Council Members and Elected Officials,

I request to slow down the decision-making process and urgency to file the EIS. Not enough thought or community input has been placed into such a permanent decision.

I'm gravely concerned about:

1. Lyons Creek. Why should industry have more favorable set-backs to precious wetlands than tax-paying citizens? More people will equal more waste, garbage and sewage. This plan can potentially ruin the wildlife and natural habitat. Furthermore, the oil, gas and waste will not only run into the local creeks but will leech into the fragile water tables.
2. Traffic. Congestion on Ballinger Way already backs up to LFP Elementary and Bothell Way backs up from the Town Center to the light in Lake City at 145th. It's next to impossible to get in or out of local driveways during most daylight hours.
3. Entrance/Exits. There are only a handful of ways to access the Mall from either side. Adding more density will make a bad situation worse.

4. Parking. As it is, parking on the street is nearly non-existent.
5. History. If you know the history of the Park you would know that the LFP Town Center was built on a swamp wetlands. That the builder bribed County officials. LFP was formed to stop the very proposals you are proposing. I know, my Grandfather and his friends built the Civic Club. My family (collectively) has lived here 70 years, probably longer than the Council Members combined.
6. Foundation. Because this is a wetland, close to the Lake (which water level was lowered with the dikes/levies), there is no way you can go down in depth. The water table rises above ground level as it is; which is why the city bought the house behind the mall due to flooding. This means the building will have to go up while built on unstable ground. This will be a major eyesore and unstable.
7. Storm Water Runoff: this is a serious problem. All the new drains and attempts to harness the flooding have failed. The water table still floods areas of LFP. A few years ago water flooded over Bothell Way, Homes continue to flood on along Lyons and McAleer Creeks. The sink hole on Ballinger was the fault of the city. How do you honestly think any construction can out-engineer Mother Nature?
8. The Consultants have a terrible track record and the track record of LFP Government in hiring consultants is horrible. I have no faith in the consulting firm. The presentation last year was a disaster.
9. Holding meetings in Leavenworth came across as deceptive.
10. If you need Real Estate, the City Hall should be annexed into a parking garage. As it is, LFP Government took a tax paying establishment and created a giant cost center. LFP has a terrible track record. It's time to break the chain.
11. I request to de-couple the Transit Project, from the Parking Garage, from the Real Estate Project. Too much conflict of interests, too much special interests funds, too much back-scratching. Clean it up.
12. The People: You were voted in by the people, for the people. You are not acting in the best interest of the local citizens.
13. NIBY. This project looks attractive (to you) because most the council members and city officials live away from the congested areas and Town Center; out of touch with reality.
14. Does the city have the water and sewage capacity to manage such a complex?
15. No previous public discussion had been presented anywhere near the scale of your tier 2 & 4 proposals. This is an atrocity.
16. Your own public council (all but the one on the planning committee) was shocked by these recent proposals and voiced their concerns. This is cause for a legal dispute.

I request an immediate halt to the current proposal.

I request to hold off making any decisions. There is no rush now that Sound transit is delayed.

I request the resignation of elected officials who voted yes to this expanded proposal B or C (A is do nothing); these options were initiated behind the backs of its citizens.

I request to fire these consultants who idiotically came up with a number of potential residents based on potential height; not impact, or aesthetics, or needs or wants.

I request to de-couple the Real Estate housing project from the Parking Garage. Too much conflict of interest and special interest monies.

I judge your team, and the consultants lack the experience to negotiate with the property owner for our best interest.

Each board member voting yes should have to live in this new complex for 5 years. Better yet, rent a house near the Town center. Then you will have a clue.

I vote no on any proposals being currently offered.

Extremely disappointed – Shame on you for the mismanagement, self-indulgence, and losing sight of what LFP means to its constituents.

Bryce James

Family has been full-time residents since the late 1940's. Pre-Town Center, pre-Civic Club, pre LFP Gov't, pre any existing Counsel-person.

Feel free to email me with any questions or concerns. I'll liberally share my views!

January 30, 2019

DEIS Comments

Dear Mr. Bennett, Mayor Johnson, and Lake Forest Park City Council Members,

I encourage a conservative and carefully measured approach when considering the three alternatives proposed in the Town Center DEIS. Only Alternative #1--no action--will allow Lake Forest Park to best retain its present character and desirable livability. Alternative #1 won't stop progress, instead it will allow a measured response as city needs dictate--it affords us the time to carefully consider future changes to residential density, traffic congestion, environmental concerns, and community.

After review of the three alternatives outlined in the DEIS, it would seem there is a desire to drastically alter the very character of Lake Forest Park, a character that we as residents hold so dear. Overly tall structures with high residential densities promote neither the "forest" nor "park" portion of our town's name. High residential densities are just going to increase our traffic nightmares. Public transportation is a great idea, and should be supported, but as Lake Forest Park becomes a hub, traffic funneling into and out of our community is only going to make gridlock and back-ups worse than they already are. It's unrealistic to think people will be willing to give up their cars and begin walking along our pedestrian unfriendly roads, without sidewalks, to a transportation center. Taking the bus may become a consideration, but we'll drive our cars to the park and ride--distances, weather, unsafe walkways, and a lack of sidewalks will make sure of that.

I truly do not want to see Lake Forest Park become a visual blight like our neighbors--Lake City Way, Shoreline, Mountlake Terrace, or Kenmore. Lake Forest Park has long established itself as a residential community living within a natural environment. It is impossible to increase residential densities while retaining our urban forests--more people, more growth, increases property values beyond a point where individuals can retain sufficient land to grow large trees. We've already seen this happening as long-time residents sub-divide treed lots, adding a house here or there, sometimes as many as five houses, at the expense of the trees. Without proper foresight, our trees, our forest, and our character will be forever lost to development--uncontrolled growth, undesirable infrastructure, and unnecessary "amenities."

I fully understand the immediate need to make provisions for a park and ride facility in support of Sound Transit's expansion. However, we as citizens and representatives need to fully consider the impact of our decisions. Higher residential densities and taller buildings may mean more revenue, and look glitzy, or they may just add to the number of unoccupied storefronts and "now renting" signs seen in so many "4-over," or "5-over" redevelopments. I ask and encourage all of you I've addressed to please take the most conservative approach (minimum building heights and lower residential densities) when considering the

DEIS and options for future plans. Alternative #1 is that best option. Please be an advocate for the citizens of Lake Forest Park and retain the character and Nature of our community.

Thank you for your time and consideration.

Sincerely,
Greg Friend

January 30, 2019

DRAFT DEIS COMMENTS

First of all, I would like to express my complete puzzlement and dismay at how fast the City Council is trying to rush this process. There is no need to do so. Merlone Geier testified at the January 16th Public Hearing that they are happy with the Town Center as is, and currently have no plans to remodel or further develop the site. Likewise, Sound Transit is not going to even begin the permitting process for the Parking Garage until sometime in 2022. **So....why the rush?**

Secondly, I would note the complete lack of meaningful qualitative analysis in the DEIS of the potential traffic impacts of not only the 300 additional vehicles entering and exiting the Town Center every day to use the Sound Transit garage, but also the 1000+ vehicles that would also be using the Town Center if the Council chooses either Option 2 (1200 new housing units) or Option 3 (1500 new housing units). **Traffic getting into and out of the Town Center is already pretty bad, especially during AM & PM rush hours. Why would the Council choose any option which would increase the traffic around the Town Center even further???** Additional vehicles in and around the Town Center are just going to clog our neighborhoods even further with cars trying to avoid the traffic on 522 and make our streets even less safe.

Thirdly, as was also publicly noted at the January 16th hearing, **Option 2 and Option 3 both completely ignore the work done by the Mayor's Town Center Vision Task Force in 2017/18, which envisioned 300-400 new housing units, not 1200-1500. Please explain!**

Lastly, Options 2 & 3 both would apparently require moving the Commons to the top of the Sound Transit Parking Garage. This would rip the heart out of the Town Center and would be horrible for our community.

Therefore, I strongly suggest that the Council choose Option 1 (no changes), and consign Options 2 & 3 to the rubbish bin, where they belong.

Sincerely,

Matthew Warburg
18 year resident of Sheridan Heights

January 30, 2019

Town Center Redevelopment DEIS

I attended the recent session at City Hall and have also reviewed the plans at the Framers Market.

It is the same story as the trees once again. Sadly our planning department is WAY MORE interested in the needs of the developers, than in the needs of the current citizens. We have chosen to call Lake FOREST Park home because we like the trees and we like it NOT looking like UVillage or Ballard.

Current zoning is MORE THAN ADEQUATE!!

You will destroy this city with traffic and congestion by putting up to 1500 living pods at the Town Center. Why do this???

We have a mother in law apartment and so do many houses in LFP. We can increase housing units with current homes and modest updates to Town Center.

Therese Frare

January 30, 2019

Town Center zoning changes

Dear Mr. Bennett,

I moved to the Sheridan Beach area of Lake Forest Park 3 ½ years ago. One of the great joys of living here has been having a shopping area within walking distance that meets many of our daily needs: groceries, drug store, hardware store, library, really good bookstore, and a variety of restaurants. I probably walk or bike there 2-3 times a week.

I will be very unhappy if a zoning change is made that reduces the commercial space at Town Center or shuts it down completely for any length of time. I have no problem with adding a moderate number of housing units (3-400, not 1500), because I think it is useful to have housing near transit centers, but not if it requires destroying one of the best features of LFP.

Doug Sprugel

January 30, 2019

Please find attached a pdf of the LFP Comment Form.

One thing for sure is we plan to vote out any council member that has sold us out to developers. LFP does not need to be another Seattle, Bothell, Lynnwood or Lake City

Madison J. Batt, PE, SE

<SEE ATTACHED HAND WRITTEN COMMENT FORM>

January 30, 2019

Redevelopment

This will have a huge impact on the character of LFP. Slow down and do it right. Keep some green space within the development.

Keep a sense of openness with views of sky. We have protected the Park for years because we love it.

Don't destroy it in one fell swoop.

From: Eskimo

January 30, 2019

Town Center Redevelopment - John Davis

Steve,

The zoning changes put forth in regards to ignoring the environmental impact (by fast-tracking it) and parking needs of building between 700 and 1500 new units in the Lake Forest Park Town Center is irresponsible and makes me question the motives of the Lake Forest Park City Council. Are you really representing your constituents or the corporate interests that want to move forward on these projects.

The environmental impact of increasing the Lake Forest Park population by 20% to 30% right next to a wetland has to be substantial. This process needs to be slowed down substantially so due diligence can be fully realized.

Secondly, assuming that the new units don't need parking because it is next to a transit hub is downright moronic. What is going to happen, is that a large percentage of new occupants moving into the apartments are going to have cars and will need somewhere to park them. They will be parking them in the communities around the Town Center far and wide. Creating a parking lot for these people, who leave their cars long-term in front our houses.

I get it that the cost of parking spaces is very high for the developer, but it is part of the cost of building a new project in Lake Forest Park. There has to be enough parking for the new development and for the new transit facility going in.

Also, the ability of the Town Center to handle the amount of new flow of cars into the Town Center is nowhere near where it should be to deal with 700 to 1500 new occupants and transit riders coming into Lake Forest Park. I see gridlock and frustration for the residents of Lake Forest Park trying to access the Lake Forest Park Town Center.

There has to be balance between what you see as progress and the needs of the citizens of Lake Forest Park.

Sincerely,

John Murray Davis

January 30, 2019

Comments on Town Center DEIS

Hello Steve. Enclosed please find comments on the Town Center DEIS.

Please include me on your mailing list for any time extensions, schedules, and next steps on responses to comments and new analyses/revisions for the DEI/EIS, since that process is not clear right now.

--

Lorri Bodi

<SEE ATTACHED COMMENT LETTER>

Ms. Bodi also submitted the following additional email correspondence on February 1, 2019:

From: Lorri Bodi [flbodi@gmail.com]

Sent: Friday, February 01, 2019 3:08 PM

To: Stephen Bennett

Cc: tom french; Catherine Stanford; John Wright; Mark Phillips; John Resha; Phillippa M. Kassover; Semra Riddle; Jeff Johnson

Subject: Additional Bodi Comments on Town Center DEIS

Good afternoon. I previously submitted written comments on the Town Center DEIS via email on January 30, 2019. For the public record, I would like to add my support and incorporation by reference of the comments of the Lake Forest Park Stewardship Foundation, Patty Cornaby, and John Hoffman. Their comments are especially compelling regarding:

- overall flaws in the DEIS and DEIS Alternatives, including the absence of a "reasonable range of alternatives"
- inaccurate representation of the No Action Alternative by not reflecting existing-development and using ill-defined hypothetical development under the current code instead,
- primary use of developer proposals to define Alternatives 2 and 3, rather than the community vision for growth and growth management plans,
- misleading and unrealistic assumptions regarding the feasibility and desirability of tall buildings on the site,
- failure to address balance between commercial and residential use on the site, as well as the related issue of community economic impacts

- the lack of concepts or guidelines for meaningful community and open space, and similarly for community commercial parking needs
- the lack of adequate assessment of impacts (and mitigation) for key issues of community, economic, and environmental importance, including traffic impacts, water and sewer infrastructure, etc.
- inadequate consideration of earthquake risk associated with increased density at the site, including soil liquefaction, based on readily available information,
- the need for additional time, public involvement, and revision for the DEIS.

Two additional comments on scope and alternatives for this nonproject DEIS. I have heard public officials/consultants recently indicate that all three of the DEIS alternatives had to be crafted the way they are, and the range of alternatives had to include 700-1500 additional residential units and heights up to 85 feet because of "state law." Speaking as an environmental attorney, this broad defense of the flawed No Action and other Alternatives based on "state law" is wrong, plain and simple. If this is the legal advice being given to the Mayor, Council, and staff, you have not been well-served.

I have also heard public officials/consultants seek to assuage community concerns by indicating that this is just a broad planning document, so all the details need not be addressed, and actual development proposals could and would be scaled back, regulated, and conditioned for lower density and community values. Speaking as an environmental attorney, this is a broad overstatement also bordering on misrepresentation. As a matter of both law and leverage in regulating and guiding new development at the Town Center, the DEIS plays an important role. Again, if this is the legal advice being given, you have not been well-served.

Regards,

Lorri Bodi

January 30, 2019

Lake Forest Park is endangered

My husband and I are unable to attend tonight's meeting concerning the rezoning and overbuilding proposed for our city.

Ray has written this to represent our thoughts.

Please if you go maybe someone could read it or at least share it with other like-minded neighbors.

Thank you,

Onward and upward

Elsa Bouman and Ray Skjelbred

"Lake Forest Park is not a suburb. It is a little city that represents an idea of how to embrace and coexist with the natural world, and today it is an endangered species. If the official human forces of Lake Forest Park move ahead with a proposal to increase density and heights in the heart of Lake Forest Park, the beauty and good values of the city will be destroyed and there can never be a return to the natural and wild values that lake Forest Park has stood for over the last 100 years. Don't do it. You can't save

something by killing it. Something deeper than the price of commercial value and economic explosion is what sustains us. We are on the edge of losing Lake Fores Park forever. Don't do it." - Ray Skjelbred

January 30, 2019

Re: Lake Forest Park is endangered

Hi Elsa, Thanks for writing this, I hope you are ok.. Having witnessed this kind of development crush in several other pristine areas in WA. I learned a couple things. Having folks out spotting endangered birds and critters and documenting them can save some areas, as well as preserving our wetlands, ravines and forests critters. And 2. It takes money to keep things the same for maintaining the green belts, wet lands, and height restrictions.. M

Marty Behnke

January 30, 2019

Following partial EIS review

Hello Steve:

It's very odd that some of us who participated in the Visioning for LFP up at the Elementary School have only now had a chance to give a cursory and partial review of the EIS. While that session was under the previous administration that is no excuse for the exclusion of those of us who had made every effort to present our hopes for our community giving of our time, energy, expertise and historical perspective.

I strongly suggest that some serious change in pace be exercised on this re zoning proposition and development plan to allow a more deliberative and inclusive process.

Thank You,

Tony Angell

January 30, 2019

In regards to the zoning changes related to the LFP Town Center:

As a resident of LFP I am concerned that allowing buildings taller than 5 stories will change the character of the town center and LFP in general, I am concerned by the lack of plans for the increased traffic around the town center that will result from the planned new sound transit parking and I am concerned by the disappearance of the town center commons and lack of

open space/green space should the expansion of the town center result in buildings taller than 5 stories.

Thank you for taking my concerns into consideration as expansion plans are developed.

Regards,
Casey Artim

January 30, 2019

rezoning feedback

Hello Steve,

Thanks for taking feedback on the our city's plan to develop the Town Center area.

Our family was surprised to hear the city was considering these changes and that the plan was not more widely known.

I am a non profit director who serves roughly 1,000 local families annually. The needs I hear expressed by our members have never centered around desiring to live in a city with a higher population density and in fact, their needs would likely be exacerbated by a sudden increase in development.

Please consider taking the time to thoroughly investigate the broader community impact of increased development and an increase in the population density of our city. Examples of investigating the impact of development could be seen in the way the Dale Turner YMCA sought out community feedback before construction of their building and the manner in which the city of Shoreline is seeking buy-in from dozens of community partners as they plan the construction of a new community center near Shoreline City Hall.

On a personal note, my wife and I love walking to the Town Center with our 5 and 3 year old and it would feel like a large detriment to our neighborhood to see it changed in this way. The kind of development our family and our neighbors need are not big construction projects but better amenities for all the young families who are making a home in LFP. e.g. Waterfront access, a community center with a gymnasium, walking trails, parks with children's play equipment, etc...

I understand there can be a natural pride in creating revenue, increasing population and large construction projects, however, I would urge you to thoroughly inquire of the community what our shared definition of a successful city looks like.

Thank you for considering.

--

Keith Nelson.

January 30, 2019

LFP Town Center Comment

Dear Mr. Bennett-

Thank you for sharing the LFP Town Center revitalization EIS and involving the community in the process. My understanding is that this document bookends the range of possibilities for Town Center redevelopment given current code and potential changes to the code and offers an intermediate scenario. With that in mind, here are a few comments:

1. I am glad LFP is moving forward with a revitalization plan (even if this is the 1st step). The Town Center as it is is terribly pedestrian unfriendly, limited in stores/restaurants, and in need of modernization to give it more of a "main street" and less of a strip mall feel. Overall, I like the balance Scenario 2 provides toward this end, and didn't see anything too troubling in the EIS, especially given that these are just planning scenarios.
2. While I like the overall mixed-use approach and value the area as a transit hub, I do worry about parking meeting all the masters: residences, commuters, commercial. I implore those working on this to not underestimate the parking needs. If the code needs to be changed to accommodate a larger parking garage, I am all in favor. That said, trudging from the 4th floor of a parking garage to run a 15 minute errand at Third Place Books will be a burden to shoppers and one unfavorable to businesses we should strive to keep (ahem, Third Place Books). A one-size-fits-all parking solution will not work. LFP is not Fremont or Queen Anne--people will still need to drive and any residential units should have adequate parking for residents and guests. This will still be a predominantly driving-oriented community given the scarcity of commercial and service assets close at hand. In addition, with the proposed ST3 transit activities, commuter parking will also be necessary. In short, don't underestimate parking needs for now and in the future.
3. I am all in favor of some higher density residential housing in LFP. However, I am troubled by the form Bothell is taking: transit infrastructure is not in place and apartment units are sprouting up like tulips. Some measured development, including high density housing would bring added benefit to our community; numerous high rise apartment buildings, some units of which could remain empty, would not. Please see through the dollar signs of increased tax revenue and be logical about housing unit density at Town Center. Alternative 3 goes too far to this end in my mind.
4. Open green space will maintain the feel of LFP even if not generating direct revenue. Please keep this in mind during the redevelopment planning. People live in this city because they like the woodsy feel (and/or they couldn't afford to live closer in to the Seattle city center--let's be honest!). In the Town Center revitalization, green space could serve as a community gathering place (gazebo, amphitheater, town green) as well as keeping the Park in Lake Forest Park. Lyon Creek and Lake Washington will also benefit from less impervious surface or buffered impervious surface--the latter of which could be greatly improved with redesign of road and parking areas.
5. Don't forget the bicycles--this includes commuter bicycle parking, secure bicycle parking for those using the B-G Trail and interested in making a stop for a snack, and those riding to Town Center to accomplish errands. The flow in and out of Town Center is terrible for cyclists as it is. It can only be improved.

Thank you again for the opportunity to provide comments. I am looking forward to seeing this project develop. Change is inevitable and I am optimistic for improvements to LFP Town Center.

Kathryn Sobocinski
Horizon View area

January 30, 2019

Town Center DEIS

Deary Councilpersons,

Please see the attached letter regarding the DEIS <text pasted below>

Dear Lake Forest Park Commissioners,

Our names are Dale and Terri Cote. We live at 17402 44th Ave in Lake Forest Park. Our home is one of many that live along the boarder of our Town Center. Lyon Creek goes through the center of our yard and then alongside the border of the Town Center. We have lived here 26 years. Terri has lived in LFP all of her life.

We recognize that our city has an opportunity to impact the potential re-development of the Town Center. We are not opposed to development – in fact there could be significant improvements that would be a value add to our city. However, we have significant concerns regarding the timeline, density proposed, and the overall DEIS not matching the vision of our city.

This timeline is completely inappropriate - resulting in wild rumors and significant distrust between citizens and our city government. Many believe you have your own agenda and are not interested in what the citizens have brought forward as a vision for LFP, or their comments to date. I was present at the meeting where the DEIS was presented and the citizens there were very upset that you were not present to hear their comments adding to their anger and distrust. We are asking that you separate the zoning for the 300-car garage from the re-zoning of the Town Center. Address the zoning for the garage first. This will allow more appropriate time and a more thoughtful approach to how to best proceed with the overall zoning of the Town Center and provide you time to build trust by listening and responding to comments and concerns. You currently do not have the time to do this correctly.

Dale was a member of the Town Center Task Force in 2005 that resulted in the current zoning regulations. The Task Force did not conclude that the Town Center would be zoned to have 700 units as it is stated in Alternative 1 of the DEIS. Again, many people feel this is an arbitrary number added by you just to increase density. The other problem with Alternative 1 is how it is presented – ‘No Change’. We believe this creates a false choice. No one wants the Town Center to stay exactly how it is, but ‘No Change’ creates that narrative when in fact re-development could happen with current zoning. So that leaves Alternate 2 and Alternative 3 as our (false) choice. We are asking that you present Alternative 1 as ‘Current Zoning’ rather than ‘No Change’.

We have tremendous concerns regarding the height proposed in Alternative 2 and 3. You MUST do a complete light study and the impact to us and our neighbors considering these height regulations. If the result of the study shows that light will not impact our properties, please know that OUR site lines are important. PLEASE consider the setbacks along this side of the property to include a wedding cake approach with any buildings along this side. We do not want to look up to someone’s balcony. The noise also needs to be considered for our homes along this side of the property as it relates to use of the property on the other side of the fence from us and how it may be utilized (playground, service road, etc). We have currently met the Growth Management Act requirements for density. Adding up to 1700 units is a ridiculous amount of density for the Town Center and LFP and does not match with the vision our citizens have provide you. Please consider changes to our Accessory Dwelling Units regulations as a way to increase density. This is a way to spread density outside of the Town Center and still keep the charm and essence of a very unique and beautiful city. 1,700 units in the Town Center would destroy this unique community and cause us to look like Lake City.

We want change. Change that is sensible and matches the uniqueness of our city and surroundings. Please create the time necessary for you to listen, build trust, engage the community, and make thoughtful and creative decisions that will positively impact our city.
Respectfully,

Dale and Terri Cote

February 1, 2019

Lake Forest Park Development

From: Peter Eglick [<mailto:eglick@ewlaw.net>]
Sent: Friday, February 01, 2019 3:46 PM
To: Stephen Bennett <SBennett@ci.lake-forest-park.wa.us>; Stephen Bennett <SBennett@ci.lake-forest-park.wa.us>
Cc: City Council <citycouncil@ci.lake-forest-park.wa.us>
Subject: Town Center DEIS and GMA Comment Letter

Attached please find my comment letter on the Town Center Plan DEIS. **<SEE ATTACHED LETTER>**



Peter J. Eglick

Eglick & Whited PLLC

EWLAW.NET

Phone: 206-441-1069

Address: Suite 3130, 1000 Second Avenue, Seattle, WA 98104

From: Peter Eglick
Sent: Thursday, January 31, 2019 5:46 PM
To: 'Stephen Bennett'
Subject: RE: DEIS Xten Ltr to S. Bennett 012919.docx Town Center DEIS

Steve

Thank you for the response (below) to my DEIS comment period extension letter request (copy attached above). I am writing again to suggest that you reconsider your refusal. The number of comments received in response to a defective and deceptive EIS cannot cure those conditions. Further, there is a limit on how much an FEIS can backfill on a fundamentally defective DEIS without fatally impairing the public review and comment opportunity that a competent DEIS provides.

For one example (among many), the “No Action” alternative in the DEIS is represented as based on the current Code. But, despite repeated inquiries from the public and even internally, you, Otak, Councilmembers have failed to disclose how this alternative was conjured. Instead, it has been suggested the secret sauce recipe will be unveiled later, in the FEIS. Of course, that will be after the opportunity for public comment and after the obligation for the City to respond to DEIS comments will have passed. In contrast, a 15 day extension of the DEIS comment period per WAC 197-11-455 will allow the City time

to explain the bases for the Alternatives and allow the public at least some time to then knowledgeably comment on them.

Viewed in this light, an extension of the DEIS comment period would give the City one last opportunity to do it right.

If the City continues its stonewall, it should be prepared for rejection of a backfill FEIS as too little too late to cure the ongoing subversion of the City's SEPA process -- by the City itself.

Meanwhile, please make sure this communication is included in the DEIS record. And of course, all rights are reserved.

Cheers,

Peter Eglick



Peter J. Eglick

Eglick & Whited PLLC

EWLAW.NET

Phone: 206-441-1069

Address: Suite 3130, 1000 Second Avenue, Seattle, WA 98104

From: Stephen Bennett [<mailto:SBennett@ci.lake-forest-park.wa.us>]

Sent: Wednesday, January 30, 2019 5:55 PM

To: Peter Eglick

Subject: RE: DEIS Xten Ltr to S. Bennett 012919.docx

Mr. Eglick,

The City provided the normal comment period of 30 days for the DEIS. As of today, the City has received 110 written comments and 27 verbal comments at the public hearing. The City believes that the public is better served by moving forward with preparing the responses to the DEIS comments at this time. The City will not be extending the comment period but will be taking full advantage of the 60 days allowed after the close of the comment period (WAC 197-11-460(6)) to issue the FEIS.

Respectfully,

Steve Bennett

Planning Director

City of Lake Forest Park

17425 Ballinger Way NE

Lake Forest Park, WA 98155

206-957-2812

www.cityofflp.com



Disclaimer: This email is considered a public record and may be subject to public disclosure.

January 29, 2019
DEIS Xten Ltr to S. Bennett 012919.docx

Good Afternoon Steve

Attached is a formal request that, as LFP's SEPA responsible official and per WAC 197-11-455(7), you extend the Town Center DEIS comment deadline to February 16. Please provide a response by COB tomorrow. And please ensure that this letter and your response are included in the record of the DEIS.

Thank you,

Peter Eglick

<SEE ATTACHED LETTER>

January 31, 2019

comments of LFP Town Center redevelopment proposals

I have been a resident of Lake Forest Park for almost 19 years. I want to go on record urging the city council to not approve changes to the Municipal Code that would negatively change the character of the city. I am especially concerned about the negative impacts on its natural environment, safety, and quality of life -- impacts that would certainly result from the increase in density being proposed with Alternatives 2 and 3 of the DEIS. As well, my understanding of Alternative 1 as described is that there are likely errors in the calculation of maximum number of units. I am concerned too that this process seems to be rushed, and am unclear as to why the council considers this such an urgent matter. I am in favor of mixed-use redevelopment of the Town Center property, including the addition of some residential units there, but not anywhere near the scale that is being proposed.

Thank you for considering my concerns and those of all LFP residents that have commented on the DEIS.

Shelley Arenas

January 31, 2019

Town Center Redevelopment DEIS

Mr. Bennett,

I was alarmed to find out just today that a draft EIS is proposing redevelopment alternatives that do not serve the needs of this community. I strongly disagree with redevelopment of the Town Center that incorporates high density residential buildings. The Town Center is a community gathering center for surrounding residents that provides local commercial services without having to travel to more distant locations to find these services. The goal of making the center more pedestrian and transit oriented should be for the benefit of surrounding residents and not to bring in more residents to an already crowded location. The proposed redevelopment alternatives will greatly diminish the quality of life that attracted me to move here 27 years ago. The influx of a more transient population will cause our Town Center to lose its identity as a neighborhood gathering place for local residents who have an invested stake in the community and defeat the whole purpose of enhancing an already successful community center. The focus of any improvements needs to be on enhancing pedestrian and transit access for the local neighborhoods which do not have adequate and convenient parking to catch the bus. At a minimum the City needs to slow down the process of redevelopment to make sure that you get it right by making sure you are hearing from locals such as myself who have not been adequately informed about the latest proposals.

Regards,

Gloria Einfeld

January 31, 2019

John Hoffman comments to LFP Town Center Draft EIS

Comments on Building prototypes

In the scenarios, the underground parking located in the lower portion of the site will be very expensive because the water table will require more complicated construction methods and waterproofing of the underground spaces. I would opine that for economic reasons, the parking will be above ground. The number of units calculated in the scenarios will likely be reduced in reality.

The buildings of 7 floor (or more) in the scenarios will be a tough building type to execute. When I was consulting or managing the Sound Transit TOD Program, prototypes of buildings to fit with the 75' or 85' height limits was limited to one structure that was used as a hotel. Even with the height bonus allowed in the Capitol Hill Plan, developers built 5 residential floors over 1 retail floor.

Higher buildings (Despite what Mandi testified) will not be wood framed, but steel studs over a first floor (or 2nd flr) platform of concrete. The increased height will probably require a sprinkler fire suppression system. This extra height will require fire fighting apparatus not currently in use at LFP.

Elevators for the additional height will probably have to be geared, not hydraulic.

Bottom line? These taller buildings will be expensive. Underground parking will be expensive. We worked hard at Sound Transit to find the "sweet spot" for financially feasible building prototypes to develop master plans for the TOD program. The building types described in the LFP DEIS weren't feasible when we were preparing our analysis. Since then, they haven't

gotten any more feasible. MY comment is that any land use analysis that uses 75" or 85" buildings to quantify unit count based on these prototypes is wrong. In fact the entire 3rd scenario can't be built and invalidates any comparative analysis.

Comments on Open Space

I'm extremely disappointed in the consideration of public open space in the schemes. While the text gave lip service to the community desire for public space, the schemes reflect open space as an afterthought. The most positive feature was a "festival street", but that was only an intermittent use.

The scenarios considered building sites as of primary concern and community space was secondary.

Public open space increases property value. (the "Proximity Principle", documented by research at Texas A&M).

Even if the scenarios should be considered for their programmatic data and not considered as a "design", reserving a percentage of the site for community use should be integrated into the statistics for analysis. I cringed at the description of the corner of 522 and 104 as "public space".

The approach to open space planning in all scenarios was what urban designers call "SLOAP" (space left over after planning).

Our community space should not be "left overs"

A permanent public gathering space as a focus of the urban design approach is essential. Ada Louise Huxtable would claim "There is no there, there" in the scenarios. Unfortunately, the land use statistics don't include reserving a central "townsquare". An alternative scenario that included a central square should have been studied for light and shadow impacts and urban design character..

Comments on Economic Analysis

While this is a non-project EIS, the mix and quantities of retail/office/housing in the scenario will impact the tax base of our city and should be evaluated for impacts. Housing usually doesn't pay for municipal services. Office and retail can contribute to our tax base, which is limited in today's land use mix.

Furthermore, Mandi suggested that implementing Scenario 1 could reduce commercial space. Ouch for our tax base.

The mixes of land use studied should include more office and retail than just housing. This is an appropriate level of analysis for a "non-project" EIS. In fact, because of the impact to the fiscal health of the City, this is an essential impact analysis, that needs to be provided in the next stage of the EIS process.

Comments on Garage Character

If the garage is the "critical path" item, what planning has been done to address the design features of the garage?

Insensitively plopping down a 300 stall garage can be a disaster for the ultimate towncenter plan.

The first floor of the garage should not be a blank wall or even an attractive wall, leaving a huge dull block.

The first floor of the garage should be pedestrian active storefronts, at least the facade(s) that face the rest of the site.

Parking floors are 10' high, commercial should be 20'. Store depth should be about 60' from entrance to back wall (about one parking bay).

If located on the edge of the towncenter site, the parking garage can be a buffer from the noise of SR104 and SR522.

If a two or three story garage is the best solution, the use of the "air-rights" over ST's garage should be negotiated during their planning process. Three floor townhouses on top of the garage would provide more units and keep the height to 60'.

These mixed use concepts should be allowed in zoning applicable to the garage. Integrating these mixes will be more expensive for ST, but we're the host city and they are obligated to serve us, provide more ridership (more commuters living on site) and contribute to a successful transit oriented development.

REQUIRING residential and commercial uses with the garage (by adopting zoning requirements to integrate uses) can set the standard for future phases.

A stand alone garage is not what we want.

I propose establishing a Public Facilities Design Review Commission to engage project proponents (such as roadway improvements and parking garages) with an active dialogue with the Partner Agencies. This citizen based review process is similar to the structure and process of the City of Seattle Design Commission, and Mill Creek's Town Center Commission.

Sound Transit uses a "design build" contract format for implementing their facilities. The ST parking garage adjacent to the Angle Lake station was implemented through a design/build contract. It's really bad. A Design Review Committee, using adopted design criteria can avoid a similar project quality

January 31, 2019

LFP Plan

Dear Mr. Bennett,

I didn't know where to find the comment form on line, so I'll just email a few comments to you now. First of all, the traffic on Ballinger is totally unacceptable now, today. And nowhere do we see any plan that includes adding additional lanes to Ballinger to accommodate the vehicles of the new residents living at the Town Center.

So I choose Alternative #1 because it has the least number of proposed units. Parking is also a concern. Hopefully the planners are figuring for each resident to have one or two cars. If there's 300 units, that would be 300 to 600 cars to park on a daily basis. That does not include people shopping or doing business at Town Hall. Our small town with its small arterials cannot handle what you propose in the other Alternatives.

Thank you.

Jan Davis

Sent: Monday, March 18, 2019 12:38 PM
To: Evelyn Jahed <evelyn@ci.lake-forest-park.wa.us>
Subject: Fwd: LFP Towne Center

Hi Evelyn,

It was brought to my attention by Shary Van that my 1/31/19 letter is not in the compilation sent to the planning committee. I just spent the past 90 minutes pouring over the 300 letters, notes, and emails and didn't find it. I can not be sure that anyone except Philipa received my email as she is the only one who responded. I'd really like my letter on record to the city - can you add it for me?

Thanks,

Alicia Buck

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

From: ALICIA BUCK <alleyb17@comcast.net>
To: tfrench@ci.lake-forest-park.wa.us, pkassover@ci.lake-forest-park.wa.us,
jresha@ci.lake-forest-park.wa.us, sriddle@ci.lake-forest-park.wa.us,
cstanford@ci.lake-forest-park.wa.us, jwright@ci.lake-forest-park.wa.us,
jjohnson@ci.lake-forest-park.wa.us
Date: January 31, 2019 at 12:24 AM
Subject: LFP Towne Center

January 31, 2019

To the Mayor, City Council, and Planning Commission of Lake Forest Park:

In the early 1900's my grandmother Dorothy Denny rode a horse from near Roosevelt to a beautiful place located between two creeks. She would meet her grandfather, Reuben Crocker, one of Kenmore's earliest homesteaders and a Civil War Veteran, who would row across the lake near the opening of the Sammamish Slough. They would picnic and sometimes camp where a Native American winter village once stood, near where the Lake Forest Park Town Center is today.

Over fifty years later in 1963 my parents bought a home in the new Longridge development on the south side of Goat Hill (what today is the Horizon View area). My mom shopped at Albertsons, Malmo Nursery, Pay & Save, Rhodes, Hallmark and banked at Seafirst.

I have lived here my whole life. I raised my three children here, and I'm not alone. There are quite a few of us who never left. We stayed because of the location; we stayed because of the schools; we stayed because it's safe; we stayed because it is indeed beautiful; we stayed because of the community. Yes, community. . . for example December 24, 2008. With over a foot of snow on the ground nearly everyone had lost their electricity, and we all convened at the Town Center. The place was packed! We ate, sang carols, did last minute shopping, visited Santa (again), and chatted with our neighbors. This became one of my fondest Christmas memories.

I can tell you unequivocally that we did NOT stay all these years to now stand idly by and watch the heart of our community, our Towne Center, be leveled and replaced by high density residential towers. I almost can not believe that I am having to write a letter to the city planner, the mayor, and the city council to even voice my objections to such a plan.

On page 13 of the Vision Draft, April 2018, I found a definition of "placemaking" which I believe you all need to revisit:

With community-based participation at its center, an effective placemaking process capitalizes on a local community's assets, inspiration, and potential, and results in the creation of quality gathering spaces that contribute to people's health, happiness, and well-being. **Placemaking can be defined as the art of creating common places and spaces of the soul that uplift and help us connect to each other.** REFERENCE: Project for Public Spaces (www.pps.org)

- Please explain how razing The Commons and not providing adequate parking for whatever grocery store or other retail stores there might be will "result in the creation of quality gathering spaces"?
- Please explain how five towers housing 1500 residential units, targeting close to 2500 young professionals without children or cars who want to commute to Downtown Seattle, will be a place "of the soul that will uplift and connect" the current residents?

The community acknowledges that changes must be made. Over the years with various planning commissions and surveys we've made our views known. But they've sadly and inexplicably been ignored.

Each of you now has a say in this lovely, unique space located near McAleer Creek and Lyon Creek, this place that six generations of my family have enjoyed. I'm guessing that in such a hurried process you may not have all the information you need to make an informed, wise decision that will connect our past, present, and future? Please slow down the process for the final EIS adoption and reconnect with your community first.

Sincerely,

Alicia Buck

4619 NE 189th Place

Lake Forest Park, WA 98155

206-931-5675

January 31, 2019

Dear Mr. Bennett,

First I want to thank you for taking the time to read through the many citizen comments that have slammed and jammed your mailbox over the last few days. I am excited about the future of this great city, but I do have concerns about the current push to move forward so rapidly with the current proposed alternatives for the LFP Town Center Development. My first request would be for the city to move forward as needed to meet the ST3 plan for a parking garage, but to decouple the parking garage plan from the larger and more impactful plan that will determine the long term character of our Town Center. Here's hoping that our great city representatives will be willing to separate these two issues so that together after more shared engagement & dialogue, we can make our Town Center's final plan one that we can all not just live with but feel proud of for the long term.

In light of this, I would like to share few of my current recommendations:

1) Of the currently proposed alternatives Alternative 1 would be acceptable but with the following density & 66 ft height restriction: no more than 300-400 living units to enable diversity of age, culture, and income with alternatives in pricing, floor plans and amenities.

2) Ensure public access to indoor and outdoor commons, Lyon Creek nature path, rooftop City park with views and activities open to public: restaurants, picnic/sitting areas, skate board/bike park, playground, pickle ball court, possibly w/partial roof coverage to ward off rain (keep open sides).

3) Focus on GREEN choices: use natural materials and finishes & design green spaces to include gardens (rain & traditional), trees, scrubs; use of green power sources: (solar, etc.& possibly stationary bikes that citizens might ride at various designated stations to produce power for lighting, heating outdoor sitting areas, eating areas, etc.

4) Make spaces adaptable for variable uses (movable walls); create shared work/business rental spaces/offices; Also: reclaim grey water for public landscaping; recycle, compost, minimize waste; install electric vehicle charging stations in garages; etc.

5) Further study to measure longterm impact of present & future increase in traffic/congestion & added building structures so that the final plan protects our precious wetlands, waterways/fish habitats (Lyon Creek & Lake Washington). If the Fire Station is already experiencing issues around land stability, what will adding more to this already sensitive area do to the health of our city. And....what are the short and long term effects of the ongoing & continued increase in traffic & congestion on our already highly compromised air quality, street pollution runoff, fragile and already compromised wetlands, etc.

Let's put our heads together to revive our aging Town Center and improve it so that it becomes a more functional, inclusive, and livable place that helps young people to come, old people to stay, and integrates the realities of our regional growth and future with our local commitment to humanity and nature.

Thank you!! Connie Barnes

January 31, 2019

LFP Town Center EIS Scoping Comment Form

Dear Mr. Bennett,

I'm sure that you have received many, many comments in regards to the scope of the pending redevelopment of LFP Town Center. I'm not sure if you had a choice in the matter, but thank you nonetheless for serving as the Responsible Official for all of this.

I would like offer my input regarding the 3 alternatives being presented. I, like every single neighbor, community member, parent, teacher, civilian of LFP I have spoken with, strongly favors Alternative #1. Development and density are perhaps inevitable, but I feel that this alternative keeps in line with the spirit and community of LFP, not to mention stays within the current zoning.

I feel that that options 2 and 3 vastly outstrip both the capability of existing infrastructure to support - fire, EMS, police, traffic, sewer, and education. I understand that part of this development is going to include the ST# expansion of BRT through LFP out to Woodinville - however that doesn't impact the commuting realities many of us face. It routinely takes 10 minutes in the morning commute time to get from LFP school to the town center on Ballinger. I fail to see how adding 1,700 apartments will not negatively impact this scenario, even with the addition of BRT lines.

Our schools are already overloaded and out of space, and this expansion will far outstrip the Shoreline School districts limited ability for incremental growth. I fear that LFP elementary, Kellogg, and Shorecrest are not equipped, and simply not large enough to handle the sudden massive influx of several thousand people.

LFP has long had a unique community, and long been a much sought after area to live in because of it's uniqueness. While I understand that change is coming, I absolutely do NOT want Alternatives 2 or 3 - without a doubt, they would destroy the community fabric of LFP. There is a distinct reason that so many families have sought out LFP - and that is to avoid the very scenarios that come with the options on the table.

I hope the planning commission, the city council and other leaders will listen to what their constituency is truly saying, respect the community's heartfelt desire, and not cave to develops influence and some misguided notions of what the community 'needs'.

Respectfully,
Duncan Libby

January 31, 2019

Otak conflict of interest, comment summaries and timeline

Dear Mayor Johnson and City Council Members,

In the document "Lake Forest Park Town Center Plan TIMELINE AND COW MEETINGS/DISCUSSION ITEMS" dated January 17, 2019, I am concerned regarding the events listed for Feb. 1, Feb. 4, and Feb. 8:

Feb. 1: Public Comment Period Closes. Otak distributes Interim Summary of DEIS comments to Council & PC.

Feb. 4: Otak delivers Matrix Summary of Comments on DEIS for presentation and discussion in 2/4 joint meeting with COW and Planning Commission; Otak will provide recommendations for final edits to Commission; Otak will provide recommendations for final edits to Town Center Plan, Code Amendments, and Design Standards and Guidelines.

Feb. 4: COW Meeting #4. A portion of this meeting will be a Joint Meeting with Planning Commission to review DEIS Comments Summary.

Feb. 8: Otak delivers to COW for review prior to Feb 11 COW meeting: -Components of Final Environmental Impact Statement with focus on Responses to Comments.

-Final Code Amendments and Design Standards for review

1) I do not understand why it is Otak, who appears to be responsible for the DEIS, who is reading, summarizing and putting on a matrix the comments from the community which are addressed to the Planning Director and may have also cc'd the Mayor and Council Members. I believe that a large number of the letters received are going to be quite critical of the DEIS, and it seems a conflict of interest to have Otak be the ones in charge of reviewing the letters and organizing their contents for presentation. Should it not be our own City staff, planning department, or at least a neutral third party doing this work? (And I don't mean Fehr and Piers.) And if the volume of letters is too much for our staff to handle, doesn't that mean something in itself?

2) Also, that is a remarkable turn around time (unless Otak is working 24/7 through the weekend) to have all the letters compiled by the evening of the first work day after the public comment period closed at midnight. Obviously they could be documenting and compiling the letters as the comments have been coming in, but it seems to not take the efforts of the public very seriously to turn out a report so quickly.

3) Feb. 8 mentions "focus on Responses to Comments." When does the public have a chance to review the citizens' comment letters and the City's responses to the comments before the Feb. 20 meeting?

4) This feels like a rushed timeline and seems to assume full speed ahead for zone and code changes. I believe the citizens of the City do not want a zoning change at this time and in this rushed process. I'm not sure how many letters you will get in the final count, but I urge you now, as Mayor Johnson mentioned at the end of the Jan. 16 hearing, to find a venue for the Feb. 20 meeting that will accommodate a large number of people, and to continue to demonstrate that the entire process is very transparent.

Thank you.

Sincerely,
Barbara Sharkey

RESPONSE: From: Stephen Bennett

Sent: Monday, February 04, 2019 11:37 AM

To: Barbara Sharkey

Subject: RE: Otak conflict of interest, comment summaries and timeline

Ms. Sharkey,

Thank you for your comments on the Draft Environmental Impact Statement for the Town Center Plan. Your email will be made part of the official record of comments on the DEIS. On behalf of the City, I want to let you know that we appreciate your interest and look forward to your continued engagement in this process.

Otak is under contract to the City and City staff will be reviewing Otak's responses in the final EIS prior to its issuance by the City.

Sincerely,

Steve Bennett

Planning Director

City of Lake Forest Park

Ms. Sharkey also submitted the additional email correspondence:

reading comment letters

Dear Mayor Johnson and City Council Members,

As the deadline for the comment period regarding the DEIS approaches at midnight tonight, I was alerted that Monday's COW meeting has been cancelled.

I hope that you will ask Otak to prepare for each of you a copy of all the letters/comments received, neatly bound and easy to read, and that you all find a time (perhaps Monday evening?) when you can sit down together in comfortable chairs some place (Third Place Commons?) and read this document, appreciating the time and effort that went into it from so many citizens.

From samples I have seen, some letters will be short, some long, some very general, and some very specific. But they represent the broad range of people concerned about this rezone issue and the process we are involved in. These letters and comments deserve to be more than dots on a matrix, and I hope you will take the opportunity of an opening in the schedule to read them all. Because they are YOUR lfp, and each one deserves to be read by all of you.

Thank you.

Sincerely,

Barbara Sharkey

January 31, 2019

Dear Mr. Bennett, Mayor Johnson, and City Council,

Following is additional feedback on the Town Center DEIS and process:

I am asking the city and consultants to refrain from referencing the "tenant leases" in the Town Center in any communication, verbal or written, as having any meaning whatsoever with regard to the timing of development. An owner of retail developments in multiple states like MGP has numerous ways to facilitate the end of those leases at any time, such as:

1. Offering premium retail space in exchange in a different retail development, perhaps even in a different state.
2. Offering considerable TI money in a newly developed space in a new Town Center development.
3. A cash payment for the tenants to leave.

The leases are a trivial factor and referencing them is an abuse of many citizen's lack of understanding of commercial real estate by the city council.

Chapter 1.0--Page 1

Please delete the reference to "(MGP)"..."has plans to redevelop areas of the site in phases over the next 15 to 20 years." -- because:

1. There are no known "plans" available to the city.
2. This is non-factual and non-binding. MGP's intentions could change at any time and therefore should not be the basis for any consideration by the city on an issue with long-term impact.
3. The ownership of the property can change at any time so any "plans" of the current property-owner would be irrelevant.

Chapter 1.0--Page 1

Please delete the reference to "As the community grows and changes," "new residents and businesses"--because:

1. This is non-factual. It is not known if the city will grow OR change, if there will be new residents or new businesses. The city could intend for there to be population growth but the population could shrink (if for example there was a natural disaster or epidemic). There is no reason to think the boundaries of the city will "grow."

Chapter 1.0--Page 2

If referring to the work of the VISION Task Force please also invite the members of the VISION Task Force to include statements affirming whether or not they believe the DEIS reflects their work product accurately.

Chapter 1.0--Page 4

Please explain why and how these three alternatives were determined. Why are the heights of alternative 2 and 3 at 75' and 85'? Why not 240' or 1,000' like a "skyscraper"? There should be a robust and rational explanation of this to assure the citizens that these heights were not just "gut feel" or arbitrary. If they are based on economic factors that perhaps do not apply to less-high developments all over the region, please explain them.

Please provide a "heat map" of the area (5 mile radius) to pinpoint all similar developments at 65', 75' and 85' to establish how common these heights are or how unusual they are.

Chapter 1.0--Page 4

Please delete the reference "It is assumed"... "multiple phases"... "15 to 20 years." See above for reason.

Chapter 1.0--Page 4 and Page 5

Please clarify the use of the term "assumes" in the sentences containing "assumes a mix of commercial, office..." What is the basis for these assumptions. Would the "mix" be required or not? The document promises that "detailed descriptions" of the assumptions will be provided in Chapter 2, but in Chapter 2 there is no explanation for the basis for the assumptions.

Chapter 2.0--Page 1

Why was there not an Alternative that maintained heights as they are currently allowed and also adds additional requirements to the developer to achieve the VISION? If the central idea of the DEIS is a quid-pro-quo between the city and the property owners, that is not explained clearly. If the quid-pro-quo centers on the city providing the property owner with new codes in order to increase the value of the property in exchange for city-benefitting requirements that conversely reduce the property's value, the projected increase in value (which can be estimated by a consultant with that expertise) and the value of the benefits afforded back to the city should be evaluated and reported. That is, the quid-pro-quo must be calculated and laid bare to the citizens. For example, if the action by the city will increase property value by \$10 million but the benefits to the city in return are only valued at \$5 million, this must be known and considered.

Chapter 2.0--Page 1

Please delete the reference and consideration of the "assumed" / "anticipated time period"... "is 15 to 20 years" because this is based on non-binding comment by the current property owner and should carry no weight whatsoever. Please delete this from the Table 2.1 notes as well. See above for more about the "15 to 20 years" issue.

Chapter 2.0--Page 3

The description of Alternative 1 makes clear that in this scenario "there would not be amendments to the Town Center planning and land use regulations (Chapter 18.42 of the LFPMC) or accompanying design standards and guidelines to illustrate the desired character and design treatments..." It is not clarified why there is not an Alternative 1.1 which maintains the existing development limits and also establishes new design standards, desired character, and design treatments.

Chapter 2.0--Page 5

Please delete the reference to "15 to 20 years." See above for reason.

Chapter 4.0, Section 4.1--Page 4

Please delete the bottom photo showing the "open market" and "the marketplace" as this structure does not appear to relate to assumptions of Alternative 2 and is significantly lower in height. This photo appears to be misleading.

Additional Requests:

1. CITY COUNCIL ROAD TRIP

Please have the city council tour multiple regional developments together that are 65', 75' and 85' feet tall, as well as over 1,000 dwelling units. Please experience the relative scale of these developments first-hand before making this monumental decision, you owe that to the citizens.

2. Please add to the DEIS photos of information about the height of the current structures in the Town Center for reference.

3. Please do a "balloon test" of the height limits under consideration by putting up helium balloons up at the Town Center on a Saturday at 65', 75' and 85' so the city council and citizens can come see the heights

from different angles and neighboring properties. This is a planning step used on projects with controversial height issues.

Thank you,

Jay Wheatley

January 31, 2019

Town Center DEIS

Mr. Bennett,

We have lived in our current residence in LFP for over 32 years. We are for the measured and responsible development of the Town Center. Therefore, we wholeheartedly support the comments F. Lorraine Bodi addressed to you in her letter of 30 January 2019 on the Town Center DEIS. For all the reasons she expressed the DEIS process for this project should be put on hold and a new DEIS drawn up that accurately reflects the Vision statement, the Comprehensive Plan and Current Code. There appears to be no urgent reason why this cannot be done to avoid a major mistake being made by the city that we all will have to live with.

Beyond Lorri's comments, we would like to know what the impact will be to the city with respect to operating costs as a result of the various alternatives. There is bound to be additional revenues streaming to the city. What will those be and their source? What will be the increase in cost bases for running the city as a result of the various alternatives? Residents need to know this for the purposes of deciding how they feel about supporting a future decisions on this project. The assessment of projected economic health of the area needs to be carefully analyzed to determine if any development can be supported in a sustainable manner.

Sincerely,

Wynn & Carol Harper

January 31, 2019

Development and Density in LFP

I want to weigh in with some comments about what is now unfolding in LFP. I haven't come across anyone in the community that is in favor of more density and development in LFP, and I certainly do not. This smells of influence from money and power plays from political influencers at Sound Transit and Seattle special interests groups. There is nothing about this that seems in line with the culture and community of LFP, nor the vision that you and your predecessors have publicly claimed in the past.

Please demonstrate more candor about those that are actually influencing the proposals and decisions made. The suggestions that these transit proposals originated from the citizens of LFP come across as disingenuous and costs you credibility. If you will actually align with this community and its actual

values you will win much support. If we can remove the money and power pressing the issues then we can retain that which makes this community so special.

I moved to LFP from the Lake City neighborhood years ago to get away from the unending push for density and development, and now it seems that ethic is following me here. I don't know how many 2nd and third generation families I have met, but you can't think the draw that keeps people coming and returning to LFP is a high rise, transit traffic with oversized structures and expanded traffic and traffic lanes.

There is absolutely nothing that mandated high traffic volume on Ballinger. Already we can't establish school zone speeds near Lake Forest Park Elementary because it would slow traffic for commuters, regardless of the evidence kids are safer when care drive next to the school less than 30 MPH during certain times of the day.

Please don't 'pave paradise and put up a parking lot'.

Rob Currah

January 31, 2019

re: LFP Town Center Project

Dear Mr. Bennett,

I recently was informed about the deadline of February 1st to make comments about the Towne Center Plan. I was rather shocked at the time frame. Many of my neighbors are unaware of the urgency that LFP is putting on this Project. We have lived in LFP for 43-44 years and raised our children in this wonderful environment. I do have concerns about the process. Please let me share my thoughts: 1) the need for housing in LFP is obvious for those of us who have lived here.(2) When I refer to process I mean incorporating more input from the community to digest, disagree, make suggestions and have a dialogue. The scope of this project is immense. People's lives will be affected and there are issues of the environment that need to be updated. (3) Finally LFP is a special place for those of us who are lucky enough to live in this community, and have our children attend the Shoreline schools. My recommendation is to delay the February 1st deadline and seek more community input. There is nothing like a compromise which satisfies all parties.

I would be glad to talk to you when you have the time. I appreciate you taking my comments.

Thank you,
Edward Goldenberg.

January 31, 2019

Comments on the DEIS for the Town Center Plan

Steve,

I have reviewed the Draft Environmental Impact Statement for the Town Center Plan and would like to submit my comments as follows:

After reading through the planning history of documents, from the 2005 Framework Design Guide, through the 2016 Comprehensive Plan Update, the 2018 Vision document, and now the 2019 DEIS, as well as having attended the January 16 public hearing, my general impression is how well considered and carefully prepared were all of the the established plans and their subsequent updates. They reflect a respect for the unique natural characteristics of Lake Forest Park, the high ecological sensitivity of the Town Center site, the needs and concerns of our engaged and caring community, and with these things in mind provide a well reasoned plan for change and growth.

I cannot say the same for the DEIS under consideration. The process of producing this document seems to have attempted to establish credibility by going through the motions of "visioning" through many hours of meetings with community members, but the result is an extreme developer oriented (developer driven?) document and a complete departure from current long range planning guidelines as well as from the Vision process which was supposedly initiated to accommodate an ST3 parking garage in coordination with our community's evolving needs and desired uses of our Town Center.

ST3 transit is good and updating the Town Center plan to incorporate and advantage this significant new piece to our Town Center is necessary. Let's make the best of this opportunity to review and update the overall Town Center plan, but the "action" alternatives 2 and 3 presented in the DEIS are not sensible, reasonable, necessary, nor desired. Alternatives 2 and 3 are a rejection of and a complete departure from all previous planning efforts without providing any reasoning or support for doing so.

Alternative 1 which is labeled as "no action" actually refers to planning guidelines in place which do reflect a long history of thoughtful, community developed processes with significant accommodation and incentives for updates and growth. Alternate 1 should be the starting point for developing an updated plan to incorporate ST3 into the Town Center.

DEIS Alternatives 2 and 3 are strikingly discordant with current planning guidelines, the Vision update guidelines, community sentiment, and the unique nature of the site. I have lived in and around Lake Forest Park my whole life, I care for our community, and I am very involved. I can definitely say that my reaction matches that of most of the community: the DEIS went way off track in the sense that all of its effort and content goes toward pushing mysterious alternatives 2 and 3 instead of taking current Town Center growth guidelines and updating them to accommodate the significant ST3 addition and the Vision of the citizens of Lake Forest Park.

Jose and Lydia Vila

January 31, 2019

Comments on the Town Center Plan DEIS January 2019

Dear Director Bennett, the Honorable City Council Members French, Kassover, Phillips, Resha, Riddle, Stanford, and Wright, and the Honorable Mayor Johnson:

Please find attached my comments regarding the Draft Environmental Impact Statement January 2019 for your consideration.

Thank you for the opportunity to provide comments. My contact information has been included in the attachment; please do not hesitate to contact me know if you have any questions about the attachment.

Very truly yours,
Nancy Bradburn-Johnson
LFP Resident

<SEE ATTACHED LETTER>

January 31, 2019

proposed changes to town center

We are extremely concerned with the way this process is being rushed through! We moved to LFP six years ago. One of the draws was the town center. One of is down there almost every day. We meet friends in the commons, Robin writes at Starbucks, we visit the library 1-2 times per week, etc.

We understand the parking garage situation. But why are you rushing through the rest of the decisions? Why not give us more time to involve the entire community?? Why are most of us only hearing all these details now?

Slow this down!!! You need to get way more input from the citizens of this community!!!

Robin & Jay Tzucker

January 31, 2019

comments on Town Center DEIS

Gentlemen,

I have attached my comments for the Town Center Draft EIS.

Thank you for your time.
Brian Johnson

<SEE ATTACHED LETTER>

January 31, 2019

Density

We are writing in protest to the proposed high rise to be developed at Lake Forest Park center. We have spent our lives attempting to protect and serve our city; We have 3 fish weirs on property we own, we have helped develop Two parks for public use with a hefty personal investment both emotionally and financially. We have several pieces of property we have set into open space to preserve the not so tangible "feel"

Of Lake Forest Park. The feel is real and so is the cost and hardworking it takes to get the land. We have 6 homes that we have our employees and their families living in -in LFP.

We so believe in the natural surroundings it's school and it's name Lake Forest Park The view is the trees♥ We do everything within our power to keep the name real.

If you question the impact of the Density this project would create go to north city in shoreline. Our business is there. They have put up high density buildings and the "neighborhoods" surrounding the buildings have been changed forever. The parking is insane, streets designed for a neighborhood are now blocked daily by parked cars. The cars block mailboxes and driveways and some are parked in one spot for days making it impossible for the home owner to park at their own house. The crime rate has increased and the neighborhood "feel" is no longer of a community.. please don't make us look like shoreline.

We are doing our part to save The feeling of Lake Forest Park as a place where you can raise your kids, have wildlife, play outside and have a real community. We are doing our part please do yours and fight this proposal.

Sincerely

John Sims and Laurel Kelly

February 01, 2019

DEIS: Hold The Press!

As 38 year residents of Lake Forest Park, on Lyon Creek, we have read with great interest the current DEIS regarding potential development at our Town Center. We believe we are headed in the wrong direction. This is Lake Forest Park: we are not Kenmore, Bothell, Edmonds or Kirkland. We do not believe the assumptions and projections of the hyper-development DEIS reflect the interests of the existing LFP community.

We are not opposed to thoughtful development consistent with local needs and realities. We are opposed to growth for the sake of growth. There is no need for additional housing beyond what is contemplated by our existing comprehensive plan and Growth Management Act expectations. There are several nearby large housing developments that can accommodate housing needs in our immediate region. Consider too the contemplated Lake Pointe project in Kenmore. There are also better suited LFP housing options to the south on Lake City Way. Given our unique forested and residential history, there is no reason for our creeks, our schools, and our streets and byways to be further burdened by massive housing development at Town Center, simply for the sake of housing development (and potential developer exploitation). Please do not forget the failed visions and hopes for the so-called Southern Gateway Project. We do not have a good track record managing mega projects. We fear that the City and it's consultants are not listening to the community, in an apparent hope to be just like everyone else with big box apartments. Why?

Please reboot. Please reject the looming mistake of the century. Time to go back to the drawing boards.

Jim and Kathy Stoetzer

January 31, 2019

Town Center Vision

Dear Mr. Bennett,

Thank you for allowing the residents of Lake Forest Park the opportunity to share our thoughts regarding the vision of the Town Center.

I completely agree that the our Town Center does need to be upgraded. However I do not agree with the proposals to increase the the population density with apartments.

The vast majority of LFP residents chose to invest in buying homes here because of the unique and small town community that currently exists. The Town Center feels safe and our children feel safe to explore the area. LFP was just ranked as one of the top 15 safest cities in Washington!

I find it astounding that so many residents who grew up here as children return to LFP to live and raise their families. I have never seen such devotion and love for a community!

Some of the proposals that have been presented are not what the majority of the community want and it feels like the City of Lake Forest Park is not listening to the people they serve.

Many of us already feel unsupported on a National level. The City of Lake Forest Park is not I place I would of ever expected to feel the same despair.

Thank you for your time.

Best,
Amanda Royal

January 31, 2019

LFP Town Center Plan (considerations)

Good morning,

My name is Juan Robles and my family and I just purchased a home near Brookside Elementary. It is our dream home; our forever home. We are moving to LFP from North City Shoreline, but our day to day activities are primarily within the LFP community. Spending the afternoon at the Civic club is where you are most likely to find us on a sunny afternoon. Going to third place books, getting a coffee and something sweet from the Honey Bear Bakery, visiting the farmer's market and exploring our beautiful

parks all within our urban retreat is the reason why we have always dreamed of living in this community. This community is also ranked as one of the safest in the country as well as having some of the best schools in the state. I have so much pride and affinity with this community that I am currently in the testing process with the Lake Forest Park Police Department and hope to be soon be in a position where I can serve this community and make a positive impact.

I have deep concerns with the plans laid out for the commons area with regards to adding a proposed 1,500 residential units. Truthfully, even if this were to be cut in half, those numbers still give me trepidation. A plan to support a potential 30% in population would naturally overburden our schools that are already at capacity. This plan simply does not make any logical for feasible sense to me. Another major concern is that LFP is know to have very limited safe walking areas. There are very few places where you can access a sidewalk to encourage people to walk from their residence to the town center or even local parks. This proposition would have a significant impact with traffic and pedestrian safety.

Reference from Wikipedia:

"Lake Forest Park was founded in 1912 by Ole Hanson as one of the Seattle area's first planned communities. Envisioned as a picturesque retreat for professionals, the developers planned roads and lots in strict consideration for natural landmarks. The original prospectus for lot sales declared: ...the strict fiat has gone forth that all the natural beauty must be preserved; that no tree must unwittingly be cut down; that the natural wild flowers must remain; that the streams, the springs, the lake front, the nodding willows, the stately cedar, the majestic fir, the quivering cypress and the homelike maple and all the flora and fauna with which Nature has blessed this lakeshore, must not be defiled by the hand of man."

Lake Forest Park has withstood the test of time. For over 100 years it has stayed true to its core values and that is why we have decided to raise our family here and make this our forever place. Please help us preserve LFP and allow it to be the place it has always been and not the place that it once was.

Please, extend the review period and seek additional community feedback. My sense is that these concerns will resonate with the majority and should be taken into serious consideration.

Thank you for your time and attention to this matter.

Warm regards,
The Robles Family

January 31, 2019

TC DEIS

Steve,

Attached are more comments on the DEIS. Two main comments to summarize:

1) Alternative 1 is not a "no action" alternative. The 2005 Guidelines specifically state that a rezone would have to occur (Step 8: "would like approve a rezone"). This has impacts throughout the entire DEIS as significant impacts are being defined relative to Alternative 1.

2) The quality of analysis would not pass a high school class. I use the analysis of open space as an example but note that faulty reasoning occurs throughout. The DEIS states "All scenarios shown in Table 4.3.9 are above the 2 acres per 1000 existing condition" but this relies on a number of faulty assumptions:

- 1) it includes private open space. Our backyards did not get counted in the PROST open space.
- 2) It includes existing nearby parks yet does not include the population that already uses these parks
- 3) It includes existing rain gardens and open space that did not get counted in the PROST plan, and hence are not comparable.

While I'm concerned about the direct conclusions of this section of the DEIS, I'm more concerned about the lack of rigor, and even intentional bias, that underlie the analysis. This analysis is actually quite simple: 100sf per unit comes out to about 1 acre per 1000 people, or about half of existing conditions. I am struggling to come up with anyway the tortured logic in the analysis is anything but an attempt to mislead - incompetence is not this complicated.

T.J.

1.0-4: The three scenarios considered do not represent "book ended" scenarios, at least for the lower density alternative. Alternative 1 is stated to be based on an outline of a plan submitted approximately 15 years ago which never received approvals nor was negotiated with a special task force, as the guidelines require. Thus, this scenario is akin to a developer's wish list, rather than lower book end.

1.0-4: Alternative 1 – No Action is incorrect. According to the 2005 guidelines:

"Step 8: City Council reviews and acts on the Staff recommendation regarding master plan and development agreement. Council would **likely approve a rezone** subject to the terms and conditions of the Development Agreement." (bolding and fontsize mine)

This indicates that to utilize the 2005 guidelines, a rezone would have to occur. Further, the "likely" indicates that a rezone is not guaranteed. Thus, the action to rezone the Town Center for Alternative 1 is the same action that is required for Alternative 2 and 3. This is not a "no action" scenario. However, there is a simple no action scenario which follows the code:

"18.42.040 Limitations on use.

Every use locating in the TC zone shall be subject to the following further conditions and limitations:

A. Residential uses are not permitted as separate projects; they must be developed in combination with commercial or nonresidential uses as part of a single site development plan. Residential uses may not be developed at a density of greater than seven dwelling units per acre;"

It is important to use a true "no action" scenario. For example, the traffic analysis defines significant impacts relative to the "no action" scenario. Using an "action" scenario, as Alternative 1 is, invalidates the conclusions of the traffic analysis.

2.0-1: "No action" scenario is again inaccurate as significant action consisting of a special task force and city council vote to rezone would be required. 18.42.040 should be used instead.

2.0-1: Action alternatives are not supported by Vision statement. There was no significant community input on density or building heights, much less support for increasing them beyond the 2005 guidelines. Please provide concrete and quantitative information from the Visioning process to support this statement, or remove any increase in height above the 2005 guidelines from consideration.

2.0-1: “Book-ends” is again inaccurate as 18.42.040 provides a much simpler and inarguable lower book end.

2.0-1: An ST3 parking garage should not be assumed in all scenarios. Alternative sites, such as the Chevron Station and Veterinary Hospital, are potential alternatives.

2.0-2: Alt 1 – No Action. The 700 units is not supported by the building sizes drawn in later Figures. GSF is <500,000, insufficient for the 1000sf average unit that the Otak consultant is on record telling the Planning Commission is the average size. This neither represents a low book-end, nor a no-action scenario, nor a physically plausible plan.

Table 2.1: This table needs to define what a dwelling unit is, including the median size and distribution of sizes. It should also specify the gross square footage of residential space. The table should also include the public open space added in each scenario and labeled in Figures 2.1, 2.2 and 2.3.

2.0-3: Alternative 1 – No action is again incorrect. It requires significant action in the form of a special task force and a city council resolution.

2.0-3: “adoption of the 2018 Vision would not occur” is misleading for two reasons: 1) the majority of the Vision is already contained in the 2005 guidelines and 2) the Vision would be used by the special task force and city council to evaluate and negotiate any agreement under the 2005 guidelines.

2.0-4: Why are only greater numbers of units considered, and not lower numbers of units? This results in a biased alternative. If there is uncertainty in the number of units, and the goal is a lower book end, the lowest number of units must be used.

2.0-5: “did not move forward because of the economic recession” is attributing something which cannot be demonstrated. The proposal did not move forward, period. It was never reviewed by a special task force or the city council. If the recession had been the only factor, this should have been built within the past 5 years as property values and housing demand has exceeded pre-recession levels for approximately 5 years now. Therefore, there is no reason to use this as a lower bookend.

2.0-5: Why are “civic and community uses and spaces ... expanded” in Alternative 2 but not specified in Alternative 1. The Guidelines are crystal clear that they can only be used in exchange for public amenities, which are incredibly similar to those outlined in the Vision statement. This presents a biased proposal.

Figures 2.1, 2.2 and 2.3 use different legends. These need to be consistent between all 3 figures for comparison.

Figure 2.1: The buildings are not large enough to accommodate 700 units of 1000sf, as stated by the consultant to the planning commission. Why is there scenario not self-consistent?

Table 4.3.5 needs a new description as it does not make sense.

Table 4.3.6: Drop the decimal place and take a lesson in significant figures.

4.3-55: “Increases in K-12 student population would occur incrementally over time” – how is this determined? The proposed code and guidelines have no statements about how many units can be built in a given time. It is likely that the population increase would be punctuated and would not increase gradually – it is possible that the site could be redeveloped all at once. For the DEIS assumption to be true, specific limits of new units allowed per unit would need to be put in place.

4.3-55: Please provide the specific information that the school district relayed about capacity. As the parent of a 19-20 Kindergarten, we are being told that there is insufficient space at Brookside Elementary for Kindergarten and our child might be placed elsewhere in the district. This suggests that there is not capacity. The DEIS statement is unsupported, unattributed and unverifiable.

4.3-57: The number of things wrong with the Open Space analysis is staggering. First, private open space should not be included in the calculation of PROST acres per 1000 population. My backyard is not included in the PROST acreage, so a private Town Center roof top garden should not be either. Second, the existing PROST acreage within walking distance of Town Center should be assigned solely to the new Town Center residents. The parks are already used by the city population – in fact, it is clear that our community does not have enough open space and is trying to remedy that. Either the existing PROST acreage needs to be removed from the calculation, or the existing population which utilizes them needs to be added in. Third, “if existing rain gardens and open spaces that are likely to be retained” are being included in the open space calculation, these (and all similar features within the city) need to be added to city-wide PROST acreage used for comparison.

4.3-57: “All scenarios shown in Table 4.3.9 are above the 2 acres per 1000 existing conditions”. This is simply not true. For Alternative 1, there would be 2.5 acres of new public open space (100,000sf for 1000 units at 100sf per unit plus 10,000sf for commercial). With a population of 2400 (2.4 people per unit times 1000 units), this is 1 acre per 1000 people, only half of the existing condition. (The amount of open space per 1000 people for Alternative 2 and 3 will also be 1 acre per 1000 residents because the 100sf per unit assumption is the same and the population per unit assumption is the same).

4.3-57: This table is grossly misleading. Let’s follow the logic in this section: 1) LFP has significantly less park/open space than the national average and is working to change that; 2) let’s add up all the somewhat nearby existing open space; 3) then add up new TC open space with the existing open space, which is already inadequate for our population; and 4) include the existing open space but not the existing population, in the acres per people (Table 4.3.9). This grossly misrepresents the open space per new resident. Only the new open space should be included. Or all of the current population which uses these spaces (i.e. the entire city), should be included. This calculation needs to be consistent and not a bait-and-switch.

4.3-58: “All scenarios ... are above the 2 acres per 1000” does not include the population which already uses these areas. This calculation is simply bogus.

Table 4.3.10: Why does this table add up to more than any of the three alternative scenarios? This creates a bias that all of this is achievable with the updated code even though that is not true even under full development of Alternative 3.

4.3-62: Municipal services analysis is insufficient. What is the additional cost to the city per resident and how will this be covered by city revenue from the new residents? Will costs have to be born by existing residents? What about impact fees?

4.3-63: Fire and emergency access analysis is insufficient. Increased traffic, particularly at afternoon peak when traffic backs up at 170th.

4.3-65: Schools “because growth would be expected to occur incrementally”. What is the assumption based on? Redevelopment would almost certainly occur in bursts, which is highlighted in this very document when Alternative 1 is discussed as a first phase of redevelopment. 1500 people, 10% of our population, could be added at once. This is not incremental growth. Specific caps on annual growth should be implemented if the DEIS will not evaluate the impacts of punctuated growth.

4.3-66: What guarantee is there that the development would be gradual? Without specific provisions in the code, this analysis is not sufficient.

4.4-72: “natural gas to the city of Shoreline”. This reveals that the DEIS did not even consider our city, Lake Forest Park. Please actually contact PSE and get something on the record about the availability of service.

4.4-73: Shoreline again.

4.5-88: “transportation impacts of Alternatives 2 and 3 are measured against the transportation conditions of Alternative 1 No Action”. This creates a fundamental flaw in the analysis. Alternative 1 is not “no action.” It requires appointing a special task force and vote from the City Council to rezone the Town Center. This analysis must use a true “no action” scenario which uses the 18,42,040 and the 7 dwelling units per acre stated therein.

Table 4.5.4 – The impact of choosing a ‘significant action’ alternative 1 is that the traffic analysis would find that 4 of the 10 intersections are significantly impacted (i.e. increased delay of >5s). I can only use current conditions (Table 4.5.3), but intersections 2,5,6,9 would all be significantly impacted under Alternative 2. An appropriate Alternative 1 must be used for this analysis to be accurate.

Table 4.5.5 – 7 intersections (2,3,5,6,7,8,9) are significantly impacted compared to the current levels. A “no action” Alternative 1 must be used.

4.5-101: The threshold of significance should not be set by Alternative 1, which is not a “no action”

Solar calculations: The solar calculations of shading need to be improved to study interior public spaces. In particular, the impact of East-West orientation has the potential to shade the entire festival street in Alternative 2 even during the summer solstice, making it a rather unappealing outdoor public space. Specific guidelines need to be developed to ensure reasonable solar exposure to all public areas.

<SEE ATTACHED LETTER>

February 01, 2019

Feedback re Draft Environmental Impact Statement for Town Center rezoning

Dear Mr Bennett,

My family moved to the Seattle area in 2007. Rather than rushing to purchase a home, we took a measured approach to finding the best community for the family. Lake Forest Park was a resounding choice for all that it had to offer: a small town feel within the bigger city of Seattle, great schools, larger plots of land, safety and a sense of community. We moved to Sheridan Heights in 2008 and have been engaged in our community ever since.

With the proposed increase in housing/rezoning of the Town Center, we have concerns

- Does this high density housing fit with the character of Lake Forest Park?
- How will this population increase be supported by the current infrastructure? Ie schools, roads
- How will the environment be impacted by these proposed changes? Fish spawning in local streams, historic flooding in the area, air quality and tree canopy?

I believe that the Town Center can be revitalized and redeveloped, but the citizens of Lake Forest Park do not believe that these proposed alternatives are in the best interest of the community. While the code changes for a parking garage may be needed for ST3, code changes for future redevelopment of the rest of Town Center do not need to be considered under this same time pressure.

The Council should not adopt pro-development code changes for the DEIS

Thank you.

Jasmine Albrecht

February 01, 2019

support for Alternative 1: Lake Forest Park Town Center

I am providing feedback related to the proposed development of Lake Forest Park Town Center. I grew up in Lake Forest Park and am now raising my own family here. It is important to me to balance the needs of the people who live here now with the growing and changing landscape of our area. Our community can benefit from improved transportation partnership and enjoy diversified commercial and residential offerings, but not at the expense of the environment and community that we cherish.

Of the alternatives proposed I support Alternative #1. I am very concerned about the impacts of zoning changes in Alternative #2 and #3 which would:

- create excessive density---our systems and infrastructure including roads, schools and environment cannot handle this influx.
- cause severe problems with access to parking (especially as underground parking is not an option because of wetlands location),
- create congested living situations with no access to playground space for children living in the proposed housing and jeopardizing communal outdoor and congregate space for community members at large.
- significantly worsen already-bad traffic congestion, with negative environmental, safety and quality of life consequences making LFP a less attractive community for current and future residents.

Thank you,

Zoe Reese

February 01, 2019

Town Center

Steve,

As a long time LFP resident, I would hope that the city considers the general very negative public opinion of the asinine idea to build 700 or more units at the current town center.

Having city council members who are looking for nothing but protecting their own interest, and their endorsement, who are the only people who seem to advocate for this idea, seems ridiculous.

Many LFP residents will leave the area, traffic will be a mess, and the outrage will be incredible. I don't know the exact involvement you and your department have, but I hope you will consider not adding residential units in the heart of the city.

Fredrik Andreasson

February 01, 2019

Regarding LFP Center Redevelopment

Steve:

I attended a community meeting this week which addressed the 3 options you are considering for LFP redevelopment. I am against plan #3 adding 1500 people to high density housing. The thought of an 85ft building(s) between the Mall and the Windermere agency is concerning. If the city needs more taxes, I prefer a small option of 400 to 700 people and i would like to see either low income options or some senior housing considered.

Best regards.

Mike Veteransneck

February 01, 2019

DEIS

Submitted for record 2-1-2019

The DEIS decision lacks community process as witnessed by several large public gatherings objecting to the limited exposure of development alternatives two and three. The DEIS deadline should be moved forward to allow public questions and comments.

The City needs to separate the proposed parking garage from the DEIS in order to meet the ST3 requirements and schedule. There is no reason to delay this project provided the height remains within existing code.

Jack Tonkin

February 01, 2019

Proposed Light Rail rapid bus project.

Dear Mr. Bennett,

I heard that the latest proposal will see the entire mall and Third Place Books to be involved in the teardown and rebuild for the Light Rail rapid bus project. I must say that changes a very core area for Lake Forest Park. This corner is truly our gathering place and the heart of the community. Between all the amenities that this corner alone brings to the community. This makes your city a very walk friendly environment. Everything a person could need is right here - the community theater, library, Third Place Book, Honey Bear, Albertsons, Starbucks and even Ross. Please reconsider including the mall area. It is sad enough that the medical building will be gone and we will have to relocate but leave the heart of this town in place.

Thank you for considering my opinion,
Sherry Luckey

February 01, 2019

Town Center Development proposals

Dear Mr. Bennett:

I am responding to the February 1, 2019 deadline for comment on the development proposal coming to the Lake Forest Park Council. After attending a January 30 community meeting to become better informed about the proposal to place housing on the site and increase density in our community, I am requesting that the council pause any action in order to revise the draft environmental statement to address critical issues.

The well understood community vision for this cornerstone property in our city contemplated residential units much less than the maximum use proposed by the consultants to the Council. The lack of parking and supporting structure in the neighborhood for this scope is one example of infrastructure unavailable for the proposed density. Since the water table is an issue to construct additional parking on site, this should be reviewed further as the proposed public transportation will not be provided to the area until 2024. These issues can be reviewed separately and give the council time to review alternatives.

It's obvious that the city should plan to support the density for the population growth in the greater Seattle region and approve a plan in a sustainable way for all the important factors. Placing 1500 units in this constricted area does not consider the burden of sidewalks for 2500 to 3000 pedestrians in our greater community. Our mobile phones provide us great data on how to travel through our city and its clear our road structure through the neighborhoods reaches

capacity quickly. Alternative one can consider needed change and reconsider a number of these issues if the project was scaled to a sustainable size closer to the original vision by our community. This is why more than 50 voters in LFP packed an elementary school music room to lend their voice for a project scale that is beneficial to the property owner and best practice for our city as planning for additional density will be considered over time along these same traffic corridors analyzed by the consultants.

Please take into consideration this shared opinion by the many citizen comments you'll receive. I am grateful for your work, the opportunity to provide written comment on the process, and will be present at the meeting in February to see how you have considered the concerns expressed.

Michael Troyer

February 01, 2019

Future Town Center Redevelopment

Good Morning Steve and the City of Lake Forest Park,

We are writing in opposition to the proposed rezoning of the Town Center that would allow housing to be built where the Town Center currently stands. We are in favor of revamping the Town Center but only to update what we have, community store fronts, areas that bring our current community together. We are NOT in favor of rezoning to allow any housing especially dense housing!!! We love our community because it is just that a community where our children can safely travel by bike or walking to the town center, where we can gather with neighbors and friends, and where we can support locally owned businesses. If it is rezoned that will all disappear. It will no longer be safe for our children to explore their independence, spaces to gather will not be sufficient, and local business could get pushed out or overlooked.

Our schools, our roads can not handle an increase in the amount of new bodies that would come if rezoned and redeveloped. We live here because it is a small community just outside the "Big City" we don't want it to become anything else, which is what would happen if 100's of new housing was developed right in our town center.

Please hear our voices, NO on rezoning for dense housing or redevelopment of any housing!!!

Sincerely,

Brandon & Tiffany Schmitz - registered voters

February 01, 2019

Comments on the DEIS for the Town Center Plan

Dear Mr. Bennett,

I want to share my thoughts regarding the DEIS for the Town Center Plan. I have grave concerns regarding the proposed housing density and the impact on traffic, the environment and the overall quality of life.

Housing density

- All three of the proposed Alternatives (700, 1200 and 1500 residential units) are grossly out of scale for the area and are not in accordance with the community's vision
- Such proposed expansion would lead to as much as a 30% increase in population and concentrated all in one area which is unacceptable
- The size of the buildings would be overwhelming and not fit with the community and environment
- Constructing 200-250 units would provide a more balanced approach, allowing for adequate assessment of impact and need
- Additional housing options throughout the community could be explored and would blend with single family residences

Traffic

- SR522 and SR104 already are at or, many times, over capacity
- The two roads are bottle necks with few or no options to widen
- Residential streets can not handle through traffic avoiding SR522 or SR104
- We need to safeguard pedestrians making their way to Town Center or walking in the neighborhoods
- Access in and out of Town Center is an issue for everyone and in particular for first responders and vehicles supporting infrastructure
- Commuters arriving/leaving the parking garage will compound traffic problems so it is essential to mitigate traffic where we can, i.e., limit the number of residential units

Environment

- The Town Center and surrounding area are on wetlands requiring a cautious, thoughtful approach related to development
- Completion of the Lyon Creek Flood Mitigation Project reduced the risk of flooding. It would be unconscionable to build in such a way as to undo that good work.
 - Having experienced the flood in December 2007 which left 3 feet of water throughout my house, I have absolutely no desire to go through that again!
- Steps need to be taken to limit the amount of impervious pavement and to provide green areas required for drainage
- Balance amount of construction with realistic requirements for parking with open green spaces
- Protect the streams and preserve the tree canopy

Quality of Life

- Preserve what makes LFP a great place to live - nature and community
- Third Place Commons is the heart and soul of the community and needs to remain a central draw, as well as the Farmers Market

- Town Center is more than a transit center or a housing development and has a greater purpose than creating revenue for an owner

Thank you for the opportunity to provide input. May my comments, along with the others you receive, be seriously considered. As the process continues, may it be transparent, truly a collaboration and representative of the community. And may it take the time necessary to do it properly.

Regards,
Carol Parry

February 01, 2019

Comments on Town Center Plan Draft Environmental Impact Statement

Hello Steve,

The comments/thoughts below are from me and my partner Trent Harris.

Please find attached recommendations for **PLAN 2 & PLAN 3**. We thought adjusting the existing drawings would be a more clear way to express what we were thinking. They are a little rough but I think you will get the idea. Basically the lack of green space and parking for the new residents was the main issue for us.

Also we showed the buildings with the corners clipped to reduce the "boxed in" feeling that sometimes happens in these types of developments.

As you will see they *both* put an emphasis on creating **MORE** and **PROMINENT Green Space**.

Currently they do not have a proper park as was emphasized by most participants in the group meetings.

If this requires the remaining buildings to have more stories and the parking garages to have more levels below ground, we are OK with that.

As there are no issues with blocking the view of other residential lots, this should not present a problem and would fulfill a deeply desired component of the redevelopment.

PLAN 1 is not included as it *does not to be enough change for Town Center going into the future.*

Sincerely,

Tony Balquin and Trent Harris

<SEE ATTACHED GRAPHICS>

*Example of
Open Space
Provisions
Alternative 2*



ALTERNATIVE 3 - UNIFORM HEIGHT & FORM



February 01, 2019

Concern regarding the DEIS

Dear Mr. Bennett,

I am gravely concerned about the current DEIS that was reviewed on Jan. 16, 2019. Please take the time to read the letter that I have attached to this email. I have endeavored to keep it succinct because I am certain that you are busy.

Please do not hesitate to contact me if you have any questions.

Thank you.

David Jardine, M.D.

<SEE ATTACHED LETTER>

February 01, 2019

Comments on Town Center Plan Draft Environmental Impact Statement (DEIS)

The process for this DEIS has been deeply flawed.

The process assumes that all impervious surface of the current footprint is automatically vested into new development. This is erroneous, and no justification has been provided.

An Environmental Impact Statement of any kind must not blatantly disregard the impact of 1500 domiciles worth of cars going through the intersection of Bothell Way and Ballinger. Any consultant that suggests this would cause no significant impact is incompetent or worse.

Best available science indicates that tire material is the likely cause of pre-spawn mortality. Development within the current code (so called option 1) will cause significant impact. A thousand families' worth of traffic could easily be enough to kill our salmon runs.

The Council has met and exceeded their obligation to GMA targets.
(Rumor has it that the city profited from the overshoot by selling the excess. And those of us with a longer memory know that the city easily could have qualified for lower targets, had they only touted our environmental gems when the targets were set.)

State law requires this exercise to evaluate "no change" versus a "more extreme" and middle option. The tax dollars spent commissioning this study are lost. But the obligation has been met.

Let's move on.

Jean Reid

February 01, 2019

LFP development plans

Mr. Bennett:

I wish to submit several comments/concerns I have with the development plans.

First, I do not feel that the potential problems of the increased traffic/parking has been fully addressed. With only one major road and one secondary road, (Ballinger Way) traffic will soon become a greater problem than it is at this time. With the increased number of homes and the transit parking there is only guessing as to the increase in auto use/transit use. More time is needed to FULLY study the impact of the options to be considered.

Thank you

Richard Ormseth

February 01, 2019

Comment regarding DEIS

Dear Mr. Bennett, Mayor Johnson, and City Council Members,
Attached you will find my comments regarding the DEIS.

I sincerely hope you will read and consider all the comment letters coming to you. Citizens have taken time and worked hard to put their thoughts on paper regarding this issue, and I hope you will carefully listen to what they are saying, and not just look at dots on a matrix.

Thank you,
Barbara Sharkey

<SEE ATTACHED LETTER>

February 01, 2019

LFP Town Center DEIS comments

Attached please find my comments regarding the Non-Project Impact Statement for the Town Center Plan.

<SEE ATTACHED LETTER>

February 01, 2019

Proposed LFP Development Concerns from Elyot Whitney

To whom it may concern.

I have been a resident of Lake Forest Park for 24 years.

Primarily my family moved to this neighborhood because it was one of the places in the greater Seattle that had not become too densely populated. While I am not necessarily against all development scenarios; the current proposal is concerning to me as it will exacerbate the traffic issues that we are currently experiencing in the area.

While DIES expects that the traffic effect will be minimal, I find it extremely unlikely that this will be the case. Currently public transportation in Seattle is underutilized as this is a driving city and the proposals for efficient connections to downtown will take years to become a viable option for commuters.

Further, as a resident I am appalled by the speed at which this proposal has been up for discussion. This is a perfect example of how large developers try and catch residents and stakeholders off-guard by not allowing adequate time to review the options and voice their preferences. It is something that if the proposal is approved, many will not forget in the future as these issues begin.

I strongly urge that there be another EIS process completed by a third party to validate the original findings are valid and then provide an opportunity for all stakeholders to make an informed decision.

Thank you,
-Elyot

February 01, 2019

DEIS comment letter

We attached our comment to the Town Center Plan DEIS.

Many thanks,
Madalina Dobra

<SEE ATTACHED LETTER>

February 01, 2019

Lake Forest Park Town Center project

Hi Steve,

Living directly across the street from the mall in the Sheridan Beach area, I have a concern with high end magnitude of the proposal. While I'd certainly like to see the mall revamped, green spaces added and have the mall thrive, adding 1500+ neighbors seems a real stretch with our limited infrastructure.

I see LFP as a small, residential neighborhood. Selfishly speaking, I'd like to see our sidewalks on Beach Drive fixed so that I can take my dog for a walk without tripping over cracks, non-existent concrete sidewalks in some areas and at the juncture of Beach/Shore Drive hoping the car coming at me at 25-30 mph sees me since there is no where to dive for cover when there are cars parked down Beach Drive, I and my dog are on a very narrow sidewalk and there is a fence blocking any avenue to safety. I'd like to see those type of things fixed in our small neighborhood before adding more cars and people to the mix.

Truly, it has been bad enough since the toll on 520. Traffic has increased on 522, the exhaust smell in our house during rush hour summer causes me to have headaches and sinus issues and the noise level in our backyard went from acceptable to kind of loud. While I understand growth, potentially 1500 more cars plus the ST3 busses and commuters seems a bit overwhelming when I think of the small neighborhood I bought into 20 years ago.

I have no answers, only a hope that you and the City Council will proceed with caution. I moved to LFP 20 years ago from Seattle and have never regretted it. I don't want LFP to turn into another Seattle. It wouldn't make sense to me to create a state of the art Town Center and living spaces, while directly across the street, I can't even walk down my street with the sidewalks (or lack of) without fear of tripping or being run down. I (now) can't sit in my yard on a warm afternoon and hear over the car noise (yes the poplar trees were a problem, but they did buffer the noise) and instead of enjoying the smells of the season, we get exhaust, both bus and car. I fear 1500+ cars will make our small neighborhood an unpleasant place to live in.

Janine and Scott Barker

February 01, 2019

Letter of citizen support for Town Center mixed-use development

Dear Lake Forest Park City Council members,

I am writing to express my support for mixed-use development at the Town Center for these reasons:

- 1) A wider range of housing sizes and prices means a more diverse community—economically, racially, and younger people and singles as well as families and older folks.

2) As a tour guide in Europe for almost 20 years, I have witnessed firsthand—especially in the Netherlands and Germany—the benefits of contained, denser urban development areas. Neighbors know and watch out for each other, walking/biking/public transit to necessities and amenities less often requires a car, and countryside is preserved.

3) More affordable housing means that many people who provide valuable services to us current residents, and young people just starting their careers, can actually live in this community. Zillow.com says the median home sale price in Lake Forest Park in December was \$698,300. For Shoreline School District employees, who make an average salary of about \$40,000; for a post office staffer who makes \$16 per hour; even for a police officer at an average of \$84,000; a home here is an impossible dream. Service providers like these will be stuck renting rather than owning—which makes for an insecure future--or having to commute from great distances. Let's show that we value, respect, and want to retain these people by making it possible for them to actually live here.

4) More and varied mixed-use development that is sensitively designed makes a community more interesting. I have friends who have lived in Bothell for many years who always left for Bellevue or Seattle to meet friends, to go out to eat, and to shop. But with all the recent mixed-use development in downtown Bothell, now the rest of us want to meet them there!

Thank you for considering my opinions.

Sincerely,

Margaret B. Cassady

February 01, 2019

Draft Environmental Impact Statement

Dear Council Members,

Attached are comments regarding the DEIS

John McGinnis

Mr. McGinnis also sent this email correspondence:

Draft Environmental Impact Statement

City Council Members

Attached is a letter I sent to Stephen Bennett. Having attended several Vision meetings, the DEIS does not represent what we took away from those meetings. I hope you will consider the issues in my letter

John McGinnis

<SEE ATTACHED LETTERS>

February 01, 2019

Proposed Town Center

Dear Council Members,

We have lived at 16732 32nd Ave NE for five years although I was raised here and the property has been in my family for over 60 years.

We moved back to this community because of the forested beauty and tranquility, yet close proximity to Seattle. We specifically moved here because of tight zoning, parks, trees and the commons in the Town Center.

Traffic in LFP is already pretty bad, we can't imagine what 500 to 1500 new apartments would do to this community.

We know things must be renovated and updated but this will make LFP look like every other local community that has added high rise apts. We are opposed to all the plans and feel that other less severe options were not even considered. It would be a shame to ruin such a nice community.

Sincerely, Dana and Dick Sander

February 01, 2019

Comments regarding zoning at the Lake Forest Park Shopping Center

My comments:

- The DEIS did not adequately investigate potential traffic congestion from the 300-car ST3 garage plus residential parking.
- The area is a wetlands and not suitable for high rise development or underground parking.
- McAleer Creek problems resolve flooding problems in Sheridan Beach and if high rise apartments are built, this certainly would complicate matters.
- We have lived in our home on Beach Drive for nearly 40 years and I can tell you that when traffic is re-routed to Beach Dr. and/or Shore Dr., it becomes a nightmare. Especially on Beach Dr. because the street is not as wide as Shore Drive.

Thank you for accepting my comments.

Heather K. Minton

February 01, 2019

DEIS

I've read the DEIS and found it confusing and misleading.

I've also read the letter to you from the Stewardship Foundation and find I am 100% in agreement with what has been listed...such as taking more time, not rushing this, and asking more questions about the density.

It seems as if the thoughts, feelings, concerns of citizens are being asked for then totally discounted as "someone" or Some Group of people are trying to change the entire feel of Lake Forest Park.

From what I've heard in talking with others, this is a model that seems to be springing up in many locations and I have the feeling someone wants to make this a "World Class City" forgetting that we are a small town of about 13,500 people.

I don't believe that proper consideration has been given to trees, traffic, salmon streams, or for that matter the basic character of this amazing city.

We don't need to be an international hub nor do we need to exceed housing standards which would dramatically change our city.

I stand opposed as currently outlined.

Armand W. Micheline
Walter F. Prentiss

44 & 39 years residency here in LFP!

February 01, 2019

Development of TowneCenter

My husband and I are opposed to the current plans for development at the LFP Towne Center. A multistory housing structure will change forever the small town feel of the center and of LFP in general.

Sincerely,

Judy and John Slattery

February 01, 2019

Zoning changes

NOT WITHSTANDING ALL THE OTHER LETTERS YOU'VE GOTTEN THESE PROPOSALS WILL DESTROY THIS TOWN. LFP DOES NOT NEED HIGH RISE IN THIS TOWN. HOW COULD WE MOVE THE NUMBER OF BODIES CREATED?

Robert Collins

February 01, 2019

Impact on community

To whom it may concern-

I'm a resident of Sheridan heights in LFP. I have been reading and hearing about the planned changes to the Lake Forest Park town center. I am concerned what adding 700 to 1500 new residences will do to our community. The impact that this will have on traffic, schools and the overall feel is not likely to be an improvement. One of the reasons LFP is so desirable is because of the neighborhood feel that it has. Making the hub of it more congested and busy is not an improvement.

Please listen to the public and re-consider.

Thank you,

Naomi Halset

February 01, 2019

Town Center DEIS

To Whom it may concern.

I have read the DEIS for this proposed project and I was amazed by how out of scale the proposals are to the community.

As a quiet suburban community of 5000 +/- households, the idea of such large multi family buildings is unbelievable. Everyone agrees that town center needs to be redeveloped and additional housing should be part of the mix.

Ideally the new development should consist of low rise buildings (2-4 stories) with ground floor retail and apartment/condos above, arranged with a village feel, with an emphasis on plazas and open space. . A project like this would be more compatible with the surrounding single family home communities surrounding it.

Sincerely,

Ian Parsons

February 01, 2019

Town Center DEIS

Mr. Bennett

The planning process for the Town Center DEIS is gravely flawed and the proposed options are not adequately described and offer no real "no change" option. The options in the DEIS are different from what the committee that met before it was written recommended.

I recommend the following:

1. Delay the end of the comment period on the DEIS until 3/21/2019. There is no rush. Give more time for people to learn about the options and give their opinion. If there is a need to decide something relative to the 300 car garage, handle that separately. Even that does not seem urgent.
2. Do not rezone without having a master use plan. That leaves too much room for misinterpretation, lawsuits by developers who propose something we do not want, etc.
3. If there is a re-zoning, also layout the development parameters so that it is clear what will be allowed.
4. Include ecological building requirements and site development codes consistent with the values of the community. Make it clear to any developer that any proposal needs to meet clear criteria for the site that includes building to a proper scale for the neighborhood and respecting the physical environment.
5. Consult the LFP 100 Year Plan and make sure what is planned fits with that vision.
6. Do not re-zone now. The current zoning allows enough housing. The densities and heights for all options in the DEIS are too high. The layouts have no aesthetic, human, or natural amenities. There should be a "no-change" option. I favor no change in zoning.

Cheers,

Bill Leon, Ph.D.

February 01, 2019

Comments on DEIS

Dear Mr. Bennett:

I write as a resident and homeowner in Lake Forest Park to comment regarding the Town Center Plan DEIS. Redevelopment of the Town Center would be the most significant change to LFP in its history, and rezoning proposals need to be aligned with the values and needs of LFP's citizens.

I respectfully submit that the process and DEIS are flawed. In the interests of brevity, I am referencing several documents rather than recapitulating the questions, concerns, and arguments set forth therein.

There are significant process issues. Comments that you received recently from LFP resident Jay Wheatley address process issues and problems related thereto. I am in agreement with the other comments in his correspondence as well.

The DEIS diverges significantly from the Town Center Vision Document published in May 2018. Significant deviations are detailed in comments that you received recently as submitted jointly by several individuals (P. Cronin, D. Mitchell, J. Robbins, B. Shilvock, and Julie Wheatley) who served on the Mayor's Task Force for the Vision Document.

The high density development set forth in the three alternatives in the DEIS (housing units with numbers of 700, 1200, and 1500) and height limits are out of scale for Town Center.

Deficiencies in the DEIS are detailed in the comments that you received recently from LFP resident F. Lorraine Bodi.

I believe, for example, that the DEIS is deficient in at least three key areas:

- (1) infrastructure impact (e.g., fire, police, and sewage);
- (2) traffic and parking impact (e.g., traffic attempting to enter and leave Town Center); and
- (3) earthquake safety (e.g., stability of multi-floor structures over wetlands).

In conclusion, it is time to apply the brakes to the current process so that the values and needs of the citizens of LFP, and livability considerations, can be better addressed.

Thank you,
Richard G. Sharkey

February 01, 2019

Code Changes

Hi Steve,

I was alarmed to hear about the proposed changes to the city's development code. I understand the need to change the code for the parking garage required by Sound Transit, but please do not rush the code changes in regards to the redevelopment of the Town Center.

I have lived in LFP for 15 years and I LOVE it here. One of my favorite things about my city is the Town Center. The sense of community it brings is like getting a small town and urban city all in one package. I fear the loss of that sense of community when I see the proposed drawings. LFP is unique. Lets keep it that way. We don't need to turn into another Bothell. thanks for your time.

Katie Hass

February 01, 2019

Town Center Vision

As a 33 year resident of Lake Forest Park I am appalled at what our city council and mayor are trying to railroad through as progress for Lake Forest Park. At the public meetings I have attended it has been

noted, on record, by committee members who participated in the vision process , what is currently being proposed bears nothing to what was put forth in their planning meetings. If the city council and mayor think these three options are so great then put it an official vote of your citizens and let them decide. It seems there are hidden agendas and maybe even conflicts of interest among our elected officials.

And, please let me be clear I haven't misunderstood the intentions of our city council and mayor, you folks our out to destroy our safe and peaceful community.

Susan Strom

February 1, 2019

DEIS comments

Dear Mr Bennett,

After sitting in council chambers listening to the DEIS summary and public comments, I am compelled to strongly encourage you, the city council and the mayor to slow down, listen to the citizens and our feedback and give care to protect our unique ecology and forge commitment to keep this great city from perishing under grandiose plans for the only town center we have. I have well founded concerns our water district cannot handle the burden of hundreds of people accessing the unadulterated water that we now enjoy. I have anxiety that my near impossible dashes across Ballinger Way will soon be replaced w a never-ending stream of angry drivers pissed at the locals for just trying to get out of our driveways. Please try to keep in place current zoning that citizen committees worked hard to establish and please listen to the Vision that the taxpayers have crafted. We really love our city!

Sincerely,

Jodi Waltier Walker

February 01, 2019

URGENT: Please Slow Down!

Dear Mayor Johnson, Mr. Bennett, and City Council,

I moved to Lake Forest Park six years ago, and immediately fell in love with the community. Within less than a year I got involved with the Neighborhood Block Watch program, witnessing passion and commitment from both the Chief of Police and the community at large. By continuing to attend open meetings I saw the same love and concern for our community as the new Strategic Plan and Town Center Vision Document were developed. The Strategic Plan values of **collaboration, equity, accountability, stewardship, integrity and service ethic** resonated. The related community outcome goals of **healthy environment, community vitality, and accountable & engaged government** are pertinent to the reason why I am writing now.

The Town Center DEIS as currently proposed does not appear to be aligned with the recent Strategic Plan or the Town Center Vision Document published in May of 2018 at all. I am asking that you slow down

the process by decoupling the parking garage from the larger plan and focusing on that first, especially as we heard Sound Transit has pushed back their plans for LFP for one year. This would provide more time for open collaboration with your community. Our Third Place Commons and Third Place Books are well known throughout the Seattle area, and as the heart of our community they MUST be preserved in a dedicated and welcoming space. The impact of 700 – 1500 residential units in buildings of 7-8 stories will permanently change the community, creating an area of density in stark contrast to the current feeling of what could essentially be considered our Main Street. It will also rapidly expand the size of our city, dramatically increasing demand on public schools and traffic on our roads. As one person in attendance at a recent community meeting stated, “Lake Forest Park is not a suburb. It is a little city that represents an idea of how to embrace and coexist with the natural world, and today it is an endangered species.” (<https://www.shorelinearenews.com/2019/02/65-brookside-residents-attend-meeting.html>)

I urge you to please slow the process and allow the community more time to reflect on and participate in what will be the reshaping of Lake Forest Park for decades. I understand the need to proceed with the ST3 parking garage. The rest of the plan can and should be postponed to enable enough time for public engagement.

Thank you for taking the time to read this,

Pat Reilly

February 01, 2019

Draft Environmental Impact Statement for Town Center Rezoning

Dear Mr. Bennett and Council Members,

We are writing to voice our opposition to the unnecessarily rapid pace at which the city council is considering the Draft Environmental Impact Statement (DEIS).

We are urging the city council to put the process on hold for at least 90 days to provide more citizen involvement and input to the city council.

Why are we requesting a reasonable delay?

1. The development proposals are dramatic in scope and impact.
2. The possibility of 1200 to 1500 additional residences in a city of approximately 5000 residences is a 24% to 30% increase. This is unprecedented in the City of Lake Forest Park.
3. Such a large and intense increase of development will obviously bring very serious traffic, parking, water quality, air quality, sewage, and other environmental problems simply as a result of the size of the proposed development. The city council should want as much time for public input as possible. Isn't the council here to serve the public?
4. The intensity of the area of the proposed development will only serve to magnify these problems. Just one of the problems was illustrated by the remark "Has anyone noticed how the Starbuck's traffic alone can hold the Center hostage several times a day? " Imagine the impact of 2400 to 3000 additional residents and their cars and bikes. The citizens of Lake forest Park should have ample time to consider these momentous impacts.
5. The spirit, if not the letter, of the Open Meetings Act has not been followed.

6. What little time for consideration by the community that has been allowed has resulted in a lot of negative reaction. Is the City of Lake Forest Park trying to limit or prevent anymore negative reaction by not allowing more time for the citizens to consider the future of their community?
7. There does not seem to be any support for this kind of development, other than from the developers and the city council. Here is the question: Who does the city council represent, the developers or the citizens of Lake Forest Park? Developers have had all the time they want to put together their proposals. Why not give the citizens 90 more days to respond, with a little more publicity regarding what is being proposed?
8. The proposals being considered by the city require and demand better education of the public as to what is being proposed and more opportunity for the citizens to weigh in on the issues raised by the proposals which will dramatically affect their futures.
9. There is no legitimate reason for not slowing down and not considering the DEIS for at least another 90 days.

Sincerely,

Albert G. Lirhus

Margaret J. Lirhus

February 01, 2019

Slow Down! The Future of Town Center - Highest & Best Use

Thank you for taking time to read my comments about the DEIS now under consideration.

Getting right to the point: slow down! I see NO GOOD REASON to tie the Sound Transit parking requirements (which I recognize are on a fast-track) to the much larger question of long-term planning for all the commercial property that will be adjacent to it. Slow down, and recognize that there is no mandate to rush a decision about Town Center.

As far as the question of “how many housing units should we allow?”, that is an important topic that merits significant public discussion over a longer period of time. The property is privately owned, but the community is entitled to a voice about how future development will mesh with our long-term vision.

Furthermore: the right to develop prime real estate has value. Lake Forest Park should plan to negotiate with any developer so that we not only mitigate the social impact, but actually increase the overall livability of our city.

We moved to our Lake Forest Park home 35 years ago, and raised our children here. I’d like to think that generations in the future will also have a community they can be proud of – one that has a sense of scale, and values that are lasting.

Rick Bender

February 01, 2019

Comments on Town Center Plan EIS

Thank you for the opportunity to comment on the Draft EIS for Town Center Plan. I have been a Lake Forest Park resident since 1978. In reviewing the EIS, I believe that the alternatives have been adequately analyzed at a programmatic level, in general. In terms of the alternatives, I support Alternative 3, provided that existing cherished resources such as Third Place Commons are well supported and maintained, and other important considerations (such as those I outline below) are included in the implementation of the plan. I support an alternative that provides increased diversity of housing options, including more affordable housing options. I also believe that additional open spaces are parks are needed, as noted by the low ratio of park acreage to population. Alternative 2 provides an aesthetic that may be more consistent with the visual character that many associate with Lake Forest Park, however, the increased economic benefit associated with the more dense Alternative 3 is needed to fund the associated benefits. The increased traffic associated with Alternative 3 could be offset by the proposed mitigation, and with increased density, increased transit availability should follow. Lake Forest Park needs to increase the overall diversity of its housing, economic base, and population to remain sustainable in the future.

Sincerely,

Molly Adolfson

DEIS for the Town Center - comment submittal

Hi Steve,

The following provides my comments on Draft Environmental Impact Statement (DEIS) for the Town Center Plan. Given the short timeline, and schedule conflicts in my own life, these reflect a high-level review of the document. I am also providing my current thoughts on the process moving forward in light of possible schedule changes by Sound Transit.

1. DEIS Completeness and Organization

a. The published DEIS does not include a references section. On the yourlfp.com website, it states next to "Appendix A - References" that "*We're working on it, check back soon!*". In my view, that is a disqualifying omission for the DEIS. For the clock to start on the public comment period, the public should have the complete DEIS available for review. This must include all of the references that are required to demonstrate the affected environment details as well as impact analysis methods and conclusions have a sound factual basis. In my work as an environmental consultant, we produce State Environmental Policy Act (SEPA) and National Environmental Policy Act (NEPA) documents and always provide in-text citations and/or footnotes, with a full references section. A document would not be provided to any of our clients for review without complete references, let alone for publication.

b. The outline for the DEIS does not appear to follow a fairly standard, recognizable format that clearly identifies all potentially affected resources with numbering to at least the third level (and sometimes fourth) that provides easier way-finding and cross-referencing for readers. The current DEIS groups resources into only five second-level (e.g. 3.1, 3.2, etc.) headers, which makes it more difficult to find, for example, discussion and analysis related to Aesthetics (or "Visual Resources") and Noise, that are commonly higher-level headers than provided in this draft. It would take me much more time than it should to evaluate if all resource topics normally addressed by SEPA are included in the document. By contrast, the SEPA checklist, theoretically a lower level of analysis than an EIS, includes 16 environmental categories clearly called out at the B.1, B.2, B.3, etc. level. Certainly some of these can be

combined in an EIS, but the Town Center draft goes too far. The DEIS for the City of Bothell's downtown redevelopment follows a more common outline/format, as one example: <https://www.bothellwa.gov/DocumentCenter/View/424/Draft-EIS-December-2008-PDF>. I also prefer the Bothell DEIS structure that groups Affected Environment, Impact Analysis, Mitigation Measures, and Significant Unavoidable Adverse Impacts by the primary resource categories all in Chapter 3. This avoids having to flip/scroll through many other topics between, for example affected environment for water, and the associated impact discussion and conclusions for water resources. These are not trivial formatting issues, because it makes it harder for the public to assess if the DEIS has sufficiently addressed potentially significant environmental impacts identified through the scoping process.

c. While attractive in a Vision-type document, the two-column layout in an EIS makes the substantive, technical content harder to follow and review. An EIS is supposed to be straightforward with the information presented as plainly as possible for stakeholders, especially decision-makers, to understand the material. In some places, its very easy to lose track of what section you're in as a reader, especially lacking more detailed numbered headings (e.g. Section 4.3 p.62 - 66, easy to go through and lose track that it is all part of a list of mitigation measures separated into bold subheading categories).

2. Action Alternatives - Associated LFP Code Changes

Before the DEIS was published, we, the Planning Commission, were also working with Otak on reviewing draft Lake Forest Park Municipal Code (LFPMC) revisions and additions. It was always a question in my mind, that I did ask at a joint PC/Council meeting, how we would evaluate proposed action alternatives where the action itself entails the LFPMC revisions/additions *before* we have a complete set of proposed LFPMC revisions/additions (or a proposed *range* of revisions/additions to create more than one action alternative). Table 2.3 in the DEIS is the closest to describing the LFPMC revisions/additions that I see in the document, and regrettably, in my view, demonstrates that we are putting the cart before the horse. There are many "elements" in the table that state they are "To be determined based on outcomes of EIS process" or are otherwise under study in the EIS. It is completely circular to draft an EIS that is supposed to evaluate LFPMC changes and say that many of those changes depend on the EIS. It is true that the *final* set of LFPMC changes would be based on the results of the EIS; however, that requires a complete set of *draft* LFPMC changes to evaluate in the first place. And again, we could figure out specific code changes that have a natural range or set of options in order to then have appropriate action alternatives. In the accelerated timeline, the focus shifted to developing hypothetical redevelopment scenarios which ultimately may or may not be well connected to the suite of LFPMC changes. Stepping back from the time pressure, this makes less sense to me than it ever did.

3. Historical and Cultural Resources

Given that the Town Center site was once a Native American village (Section 3.1, p. 1), and that any redevelopment could require excavation, it may be appropriate to discuss the potential for cultural artifact discoveries. Unless there is evidence anything remaining would have already been removed/destroyed by development of the current Town Center? Perhaps regardless, an inadvertent discovery plan could be included as a mitigation measure for cultural resources, which includes notification requirements for the State Historic Preservation Office (SHPO) and any interested Tribes. Has this been considered by the City? I do see that the SHPO Department of Archaeology and Historic Preservation as well as the Muckleshoot Tribe were included on the DEIS distribution list.

4. Process Timeline

a. It has been brought to my attention that the Sound Transit timeline may have shifted. I am still not clear on the facts, unfortunately having missed the January 16 public hearing, but was told that Sound Transit

may not apply for a local building permit for the parking garage until 2022 or 2023. If that is the case, there is no longer any reasonable justification for the accelerated timeline we've been on for drafting LFPMC changes and conducting SEPA review. With an extended timeline, both the Planning Commission and consultant team could have sufficient time to develop and refine proposed LFPMC changes that could then inform a new or substantially revised DEIS. More time should also be dedicated to public scoping and comments for a second-try SEPA process. For example, a 60-day DEIS public comment period with two public meetings, the first dedicated to presenting the DEIS and answering basic clarification questions, and the second as a more formal public hearing to accept comments after people have had time to review the document in detail.

b. If I've been misinformed and the Sound Transit schedule has not shifted, or by less time, it would still benefit both the City and residents to extend the public comment period on this DEIS to 60 days--starting *after* the Appendix A References are provided--and to extend the time frame for developing the Final EIS. It will take more than one month to sufficiently respond to public comments and revise the document to address substantive questions.

As you know from Planning Commission meetings, I support the general concept of redevelopment at the Town Center. I was pleased with the Vision process and document, and believe there are a variety of positive changes that can be made to the LFPMC to support that long-term Vision. The draft LFPMC changes being worked on by Otak are also going in a positive direction, in my view. The work is simply not done. We've finally come to a point where reality is overwhelming good intentions. I would not want the goals of the Vision to get lost due our inability to complete both the code provisions and associated environmental review in a manner that can be more easily understood by residents and that inspires confidence that their questions, ideas, and concerns have been appropriately considered.

Thank you very much for all of your work and thoughtful consideration of these comments.

Best regards,

Rachael Katz
Member, Lake Forest Park Planning Commission

February 01, 2019

TOWN CENTER REZONING

Dear Mr. Bennett and Council Members,

We are writing to voice our opposition to the unnecessarily fast pace at which the city council is considering the Draft Environmental Impact Statement (DEIS).

We are urging the city council to slow down the process to provide more citizen involvement and input to the city council.

We are concerned and asking for a delay because of these reasons:

-The development proposals are dramatic in scope and impact. Increasing the population of LFP by 24-30% is unprecedented and too rapid of growth without a reasonable amount of time to consider the impact and inform the current residents.

-Such a large and intense increase of development will obviously bring very serious traffic, parking, water quality, air quality, sewage, and other environmental problems simply as a result of the size of the proposed development. It does not appear that the city council is considering the voices, impact and thoughts of the public it says it serves.

-The extreme nature of the proposed development will only serve to magnify these current problems that already exist in LFP. Starbucks' traffic alone can hold the Center hostage several times a day. The impact of 2400 to 3000 additional residents and their cars and bikes would increase the problem to an unmanageable size. The Town Center will not be accessible/usable to residents who do not live in close proximity and walking distance. The citizens of Lake Forest Park should have ample time to consider these momentous impacts.

-The spirit, if not the letter, of the Open Meetings Act has not been followed.

-The little time for consideration by the community that has been allowed has resulted much negative reaction. It appears that the City of Lake Forest Park trying to limit or prevent anymore negative reaction by not allowing more time for the citizens to consider the future of their community.

-We talk to many residents of LFP on a daily & weekly basis. There does not seem to be any support for this kind of development, other than from the developers and the city council. Who does the city council represent, the developers or the citizens of Lake Forest Park? We are frustrated and angered that the answer appears to be the developers. It seems that the council is trying to 'keep up' the our Bothell and Kenmore neighbors and their development rather than preserving the community of Lake Forest Park. Developers have had all the time they want to put together their proposals. The citizens of the city, the individuals who live and raise their families here, deserve more time to learn about and consider the proposed changes.

-The major proposals being considered by the city require and demand better education of the public as to what is being proposed and more opportunity for the citizens to weigh in on the issues raised by the proposals which will dramatically affect their futures.

-Something this extreme and large cannot be rushed and done quietly. There is no legitimate reason for not slowing down and not considering the DEIS for at least another 90 days.

Sincerely,

Hillary & Nathan Bendiksen

The Bendiksens also submitted this email correspondence on February 1, 2019:

TOWN CENTER REZONING

We previously wrote our concerns and frustration with the proposed development of the Town Center. In addition to our previous letter we would like to add our concern about the impact on our already crowded schools. The Shoreline School District has recently remodeled Shorecrest High School with respect to the current city size (not including a 24-30% increase). Kellogg Middle School is currently undergoing a

remodel to include 6th grade (not just 7th & 8th as it has since its opening) in part due to elementary school crowding. The proposed development would surely put an enormous strain on our already crowded schools; a strain so large that the schools would not be able to handle the increase in population.

Please seriously consider not going forward with this development plan. It will have a negative impact on the community and will not make for a better Lake Forest Park.

Sincerely,

Hillary & Nathan Bendiksen

February 01, 2019

Impact of Town Center Rezoning

Dear Mr. Bennett and Council Members,

We are writing to voice our opposition to the unnecessarily rapid pace at which the city council is considering the Draft Environmental Impact Statement (DEIS).

We are urging the city council to put the process on hold for at least 90 days to provide more citizen involvement and input to the city council.

Why are we requesting a reasonable delay?

1. The development proposals are dramatic in scope and impact.
2. The possibility of 1200 to 1500 additional residences in a city of approximately 5000 residences is a 24% to 30% increase. This is unprecedented in the City of Lake Forest Park.
3. Such a large and intense increase of development will obviously bring very serious traffic, parking, water quality, air quality, sewage, and other environmental problems simply as a result of the size of the proposed development. The city council should want as much time for public input as possible. Isn't the council here to serve the public?
4. The intensity of the area of the proposed development will only serve to magnify these problems. Just one of the problems was illustrated by the remark "Has anyone noticed how the Starbuck's traffic alone can hold the Center hostage several times a day?" Imagine the impact of 2400 to 3000 additional residents and their cars and bikes. The citizens of Lake forest Park should have ample time to consider these momentous impacts.
5. The spirit, if not the letter, of the Open Meetings Act has not been followed.
6. What little time for consideration by the community that has been allowed has resulted in a lot of negative reaction. Is the City of Lake Forest Park trying to limit or prevent anymore negative reaction by not allowing more time for the citizens to consider the future of their community?
7. There does not seem to be any support for this kind of development, other than from the developers and the city council. Here is the question: Who does the city council represent, the developers or the citizens of Lake Forest Park? Developers have had all the time they want to

- put together their proposals. Why not give the citizens 90 more days to respond, with a little more publicity regarding what is being proposed?
8. The proposals being considered by the city require and demand better education of the public as to what is being proposed and more opportunity for the citizens to weigh in on the issues raised by the proposals which will dramatically affect their futures.
 9. There is no legitimate reason for not slowing down and not considering the DEIS for at least another 90 days.

Sincerely,

Jim & Ginny Skurski

February 01, 2019

Max Density & Heights

As a resident of Lake Forest Park for more than thirty-five years, I have seen lots of change. I am very aware that The Town Center needs to be revitalized and redeveloped along with added housing. I do however think it deserves much more consideration than the current timeline offers.

The City must act on a short timeline with code changes needed for a parking garage required by Sound Transit 3 -- ***however the code changes for future redevelopment of the rest of the Town Center do not need to be considered under this time pressure.*** The Planning Commission needs more time to properly review and provide recommendations on the DEIS.

The City should separate these two proposals and take more time to carefully consider Town Center redevelopment scenarios. Our community deserves to be heard. Rushing this could leave us with disastrous results.

Sincerely, Charlene Bender

February 01, 2019

Additional Comments to the DEIS

Steve,

These represent my own personal comments and not those related to the Planning Commission. These supplement my earlier comments.

I am concerned that the No Action alternative does not reflect what is allowed under the TC zoning code without variances, bonuses and other assumptions that may not be fully accounted for. With that, I am not sure it provides an adequate baseline in which to study the other two alternatives.

Lastly, I request that you grant additional time for people to submit comments. If possible, I would like to have the PC work completed, and then issue a new DEIS.

Thanks,

Joel R. Paisner

February 01, 2019

Draft Environmental Impact

Steve,

Thanks for the opportunity to provide comment on the draft environmental impact statement for the town center. My wife Julia and I are deeply troubled by the alternatives proposed. We moved to Sheridan Beach for the single family neighborhood and, though we support elements of the vision, would not be willing to trade amenities such as green space and improved walkability at the cost of higher density housing units. It's hard enough to accept the parking to accommodate transit given the increase in traffic in our neighborhood, adding hundred of dense housing units will forever alter the character of Lake Forest Park.

Though we were not closely involved in developing the vision, it's hard to imagine that those who contributed would be willing to achieve it at this cost.

Best regards,

John and Julie Drew

February 01, 2019

Town Center Planning

Dear Mr. Bennett,

Our family has lived within a 10-minute walk of the Town Center for 25 years.

We are writing to express strong opposition to residential development at the Town Center. Why anyone representing, or working for, Lake [Forest Park](#) citizens would want to change the character of our city, and reduce the quality of life for nearby residents, is beyond us.

(Already, traffic on our street is horrible; proposed changes would certainly exacerbate that problem.)

We also ask that you proceed at an appropriate pace, and make decisions with transparency.

Thank you.

Donald and Wendy Caldwell

February 01, 2019

DEIS

Dear Planning Director Bennett,

I wish to express my profound disappointment with the DEIS for the Town Center and the flawed process that it is taking.

I am strongly opposed to Alternatives 2 and 3 and find that Alternative 1 does not represent the “status quo” and is thus deceptive.

I am concerned that the DEIS does not take into consideration the Town Center Vision Task Force and does not reflect the culture, character and vision of the city’s inhabitants. I believe that the process is unnecessarily rushed and is not reflecting best practice in terms of planning practice and participation.

Alternatives 2 and 3 would surely irreparably harm the character of our town, bring only more congestion to our immediate streets and intersections, hamper emergency response, and only set back the recovery of our urban streams, salmon and greater Puget Sound region.

Looking at Alternatives 2 and 3, I really don’t see how they are different from South Lake Union or the planned redesign of Northgate. I truly believe that the average local citizen could be easily fooled into thinking that these were designs from random blocks in South Lake Union. It's uninspiring and we deserve something exceptional for this special city. Lake Forest Park should be something different. It should be a model for our region! I would like visitors and fellow residents to enter LFP and have no doubt that they are in Lake Forest Park.

If we were to plan a Town Center with the goal of putting us in competition for a regional or national award for having a sustainable urban core and buildings, what would that look like? Let’s do that! Let’s strive for something better and let’s get a plan that reflect the character of Lake Forest Park.

This DEIS process should be scrapped and we should find the time, creativity and ambition to find alternative that push the envelope in terms of sustainability and green design. Please shelve this flawed and hasty process and look to the Town Center Vision Task Force and the local people for charting the way forward. If we need inspiration, we can find urban planner and green architects to help us develop something really outstanding.

Our name is Lake Forest Park, not Urban Tower Cluster.

I am also very concerned about the idea of building the parking garage for regional commuters. We have very little urban space in LFP. Dedicating a large percentage of our town center as a parking garage for commuters from surrounding municipalities is likewise uninspired and not a good use of our very limited commercial/urban space. Let's do our part and make it easier for LFP residents to commute by bus, bike, but let's not become a regional park and ride lot just because there is money to do it!

Whatever redevelopment occurs at the Town Centre will be here for decades and probably be here long after all of us are gone. Let's leave a legacy of something exceptional! There should therefore be no false rush to approve the DEIS and code changes. Let's take our time and do this right.

Thank you.

Steven Price
Lake Forest Park resident

February 01, 2019

LFP Town Center (DEIS) Plan Feedback

Hello Steve,

I am a 12 year resident of LFP and have a daughter at school at LFP Elementary. Our family enjoys using the local town center businesses and access to library, burke gilman – restaurants and shopping. I know my daughter is getting to the age where she'll want to be more independent and explore the town center as a fun "hang out" area with her friends. I am writing to send along my concerns about the city converting this space into a completely different space with too many people and high rise structures. This is not the way I want our community to grow, and frankly, we have many many needs when it comes to safer sidewalks (or adding sidewalks period) and easy access to and from the town center area from where we live, as well as access to rapid transit in the future. I commute almost daily, and right now am driving, but look forward to the time when I can use the light rail to avoid the commute. I would envision either going to the MLT park and ride or to the town center to use the BRT. I am hoping my daughter will also have the ability to do this. After reading through the DEIS, I'm not sure what the benefits are to the residents of LFP for either Alternative 2 or 3.

I believe Alternative 1 in the is the best option for the future of LFP, our community and the people living and raising families here.

Thank you,
Lisa Reeves

February 01, 2019

City resoning plan

Dear Steve,

After reading the letter of January 31 to you from the Stewardship Foundation regarding the rezone plan, I am shocked at the depth of malfeasance on the part of the City Council. They have shown a thorough disregard of open government principles, the environment, and the intelligence and expressed desires of the citizens of Lake Forest Park. The Council needs to attend to the information in the letter, and the first step is to stop the forward motion of this plan and open the city's government to daylight and to the legitimate concerns of the people they were elected to serve.

Please add my comments to those you receive concerning this matter.

Sincerely,

Julie Hungar

February 01, 2019

LFP Town Center

Mr. Bennett,

As citizens of LFP since 1976, we have a vested interest in the future of our city. The plans for 250-1000 housing units at the Town Center is appalling. And the fact that Sound Transit is in the mix makes it exponentially worse. If this little city has a soul it is the center. It's where we shop, meet, and mingle. What happens to all the great stores and shops?

Look, we aren't naive. It's about the money. It's always about the money. We moved here years ago to get away from Seattle and high density. Single family homes are one of the reasons we have a stable community—and a big reason for LFP's tax base. It's not cheap to live here, but the trade-off is worth it.

Bottom line: We want a Town Center as a community hub, not as just another area filled with "affordable" (yeah, right) apartments with some token retail thrown in. We have not spoken to one person in favor of these plans. Apparently the city council and area "leaders" aren't listening. Good luck with that.

Mike and Mary Archer

February 01, 2019

DEIS

To: Steve Bennett, Director of LFP Planning Department
From: Gayle Sparks, LFP 98155
Date: 2/1/2019

These are my concerns with the DEIS:

1. Great increase in building height and housing density at Town Center

2. Great increase in traffic with parking garage plus housing at and around Town Center
3. The possible loss of Third Place Books' physical and community character. I am totally against putting it on top of some parking garage.
4. Extreme change to Previous Visioning Documents developed by LFP citizens before 2018

February 01, 2019

Town Center Rezoning Public Comment

Mr. Bennett,

I am writing today to express my concern regarding the proposed addition of hundreds of new apartments to be located at the Lake Forest Park Town Center.

I have been a resident of Lake Forest Park for 16 years. Prior to that, I was a business owner with a storefront located at the Town Center. I have been a part of the Lake Forest Park community for over 25 years.

Let me start by stating that I understand that growth is part of any community. The addition of residential housing at the Town Center makes sense in many ways, especially for seniors. Unfortunately, the growth being considered at this time is far more than our infrastructure could possibly support. As a homeowner located at 165th and Bothell Way, I am uniquely aware of the impact our neighborhoods have already experienced due to the extreme increase in traffic. There was a time that I could actually enjoy sitting in my backyard. Since the toll bridge became active, there is no time during waking hours that I have peace and quiet in my own home. Heavy traffic noise commonly starts as early as 4:30 with large trucks. A steady stream of cars are lined up 165th for hours each day trying to avoid the Bothell Way traffic. I cannot imagine what adding hundreds of new commuters coming out of the heart of Lake Forest Park would do to our already congested streets.

I strongly encourage you and our council members to scale back on this plan for the future of our community. There will be no going back.

Sincerely,
Cheryl Waite

February 01, 2019

Non-project EIS scoping comment form

To whom it may concern,

Bottom line, Alternative Number One.

Several reasons, not the least of which is the increased traffic congestion, the excess of dwelling units being considered, the potential height and density of the buildings, and did we mention the absolutely NEGATIVE effect of traffic.

Oh yes, we have been residents here for 40 years, how long have those that are going to change code lived here? The aesthetics of living in LFP trump this absurd potential for an overbuilt area in our small Town Center. Seems to us very few residents want the dramatic changes that COULD occur should you try to move forward with any of these alternatives, even Alternative One would allow for potential development that will forever change the complexion of our city.

We drove by Houghton today. If that's what you have in mind for LFP, we think that's just the wrong way to go. NO on Alternatives 2 and 3.

Don't have time to write more, seems you are rushing us and this process. Pull back and re access.

Barbara & Ted Husted

February 01, 2019

Town Center Plan DEIS

Dear Mr. Bennett and City Council Members,

I am writing this letter on behalf of my family and myself regarding the Town Center Plan DEIS and timetable for consideration and adoption of code changes related to development at this site. I am a board member of the Lake Forest Park Stewardship Foundation, but this letter represents my family's viewpoints and not necessarily those of the Foundation. I have read the DEIS (although there was not enough time allotted to digest it completely), discussed the DEIS with a number of LFP residents, and have many concerns. However, I'll limit the scope of this letter to address what I think are the most important issues.

First, I feel that the City of Lake Forest Park needs to slow down this process. I attended a community meeting regarding the DEIS and proposed development options for the Town Center on Wednesday, January 30th. I was astounded by the number of LFP residents, including neighbors of the Town Center, who had not heard about DEIS until an email was circulated on ~January 28th. Considering this, the huge number of people who attended the recent meetings regarding this topic, the revised timeline for the Sound Transit-funded parking garage, and the length and density of the DEIS, please consider extending the DEIS comment period for another two months to allow all LFP residents to weigh in. We cannot afford to disenfranchise our citizens, especially when there are no compelling reasons to rush this important project, especially at this early stage.

Second, the DEIS lists a 'no change' scenario that involves significant added density. The DEIS lacks an informed, data-driven comparison of options 1, 2, and 3 with current conditions, which are truly indicative of no change. This information is needed to make an informed decision about this massive

development project. Please include a true no change option in a revised DEIS and give LFP citizens adequate time to consider and respond to this new DEIS.

Third, the impact of the proposed development options on the quality of life of LFP residents must be more carefully and seriously considered. You have likely received a number of comments like, 'I don't like option 3' or 'I vote for option 1'. After talking to numerous homeowners and voters in the area, I am convinced such remarks arise from the incredibly short comment period, the length of the DEIS, and the simple fact that it is harder to articulate sentiments about quality of life, because they are not as easily measured or modeled as, for example, an increase in the delay at a stoplight. People live in Lake Forest Park because they value the lake, the trees, and the parks. Even 1200 new units means many new residents, and they will need access to green space. The DEIS does not adequately address the impact of these new residents on our current limited green space, on our parks, or on the lakeshore, etc. Simply put, they'll need more than a festival street and rooftop gardens. Adding these residents without a comprehensive city-wide green space plan will lower the quality of life of LFP residents. These 'cultural services' are in fact a category of 'ecosystem services', which can be measured and must be considered. Please formulate a new DEIS that carefully considers quality of life measures related to the development options, including impacts to per capita, city-wide green space and how a reduction in this green space could affect the health and well-being of LFP residents.

My family and I are not anti-development. We favor smart development that takes into account input from local residents. That a majority of people who were on the Mayor's Town Center Vision Task Force do not feel that the DEIS adequately integrates their ideas is both telling and disappointing. City Council Members should represent their constituents. Please listen to them and slow down this process to allow for thoughtful consideration of all development options, including a true 'no change' option, especially as they relate to city-wide green space availability and quality of life.

Sincerely,
Doug, Kim, Eilidh (11), and Delphinia (8) Wacker

February 01, 2019

Comments submitted for LFP Town Cntr DEIS

Dear Mr. Bennett, Please see attached comments for LFP Town Cntr DEIS and below.

-Melanie Paquin

January 31, 2019

Dear Mr. Bennett,

The following comments are in response to the DEIS Draft Environmental Impact Statement (DEIS) of the Town Center Plan document under public review. The Alternative 1 plan is for **up to 700 units**, however Figure 2.1 depicting the multi-family use apartments is not sufficient to allow for **700**

units of 1,000 sq ft. At a minimum, a site map and floorplans for the units should be included to clearly show the number of units the project would include. Additionally, your projection of K-12 increase that was estimated does not include 1 child per household. Why not? Are these to be luxury apartments that families with children could not afford? This needs better explanation. Although this document states that "...average household size has been trending down in the region and nationally, and it is typically smaller for multi-family dwellings" Seattle and the Seattle area is unique, experiencing the fastest increase of housing prices in the nation within the past year, so why not use what the average household size of a 1,000 sq ft unit currently holds in Seattle? One of us lived in San Francisco and watched as housing prices went up the number of individuals per household for units or multi-family dwellings went up. Where are these relevant numbers for 1) the footprint needed at Town Center to hold up to 700 units and 2) the average household renting an apartment in Seattle.

The traffic analysis is likely flawed with the conclusion that a 5 sec increase commute time would result from the proposed development as anyone who has driven to Bothell over that past 7 years can attest. How was this traffic analysis conducted? More and more people are commuting from Bothell, Woodenville, etc. and travel through Lake Forest Park. Therefore an increase in congestion from a 700 unit housing project in Lake Forest Park is likely to significantly increase the traffic through Bothell Way NE/Lake City Way NE. What would be required for a plausible estimate of traffic? Traffic congestion would need to be calculated using a plausible scenario in a draft DEIS (i.e. no significant increase in mass transit use is one scenario given the demand for larger SUVs, currently).

The open space mitigation scenarios should not include green roofs as this is not accessible land (fly in?) nor are existing parks in the vicinity of Town Center given that the average width of any open space is at most 75 feet. How would our greenbelt and existing parks absorb an additional 700 people (this is a minimum)? This plan was not thorough enough to make a reasonable determination of the impact.

In summary, the DEIS is not specific enough in Alternative 1, 2, or 3 and errors in calculations of square footage are apparent, therefore there needs to be true transparency in the footprint of the proposals based on the number of occupants (a maximum scenario) and the amount of open space required to protect our already concreted stream at Town Center and under Bothell Way NE. Please present a more accurate depiction of what the development will look like so that residents like ourselves can actually know what Town Center will look like under different plans. As of now the lack of consistency between the tables of calculations and the rendering of the plans is misleading and inaccurate.

Sincerely,
Melanie Paquin & Brad Hanson

<SEE SEPARATE LETTER ATTACHMENT>

February 01, 2019

The plans for the town center

Dear Mr. Bennett:

I am writing to voice both concern and opposition to the current plans for the Town Center. I won't go into great detail, but will make my points in short bullets.

1. Growth should be modest and in scale with the neighborhood and community. My understanding is that upwards of 1,500 housing units are planned in a multi-story structure. This is entirely out of scale with Lake Forest Park. Indeed, if built, it would be a monstrosity, would change LFP, and not for the better.
2. The process should be orderly. There is a feeling, and indeed evidence, that the process is being pushed through in a rushed fashion, and that much of the design is already "frozen in". In my experience, a rushed process is a symptom of a project that would be rejected if the process were orderly.
3. Listen to the people. There is significant opposition to a project of this scale. People understand that some growth is inevitable (and beneficial), but there is insufficient time and space dedicated to public input in a format that the council will actually listen to the people. You have undoubtedly heard about one council member who was dismissive of the comments of a standing room only group of citizens, and who didn't even read the comments.
4. Zoning is for a reason. I understand that the city is considering zoning changes that will allow this project to go forward at the proposed scale. Zoning is there for a reason, to give citizens assurance that precisely this type of development cannot occur.
Up-zoning to allow a single project to go forward that is being pushed by special interests in antithetical to the purpose of having zoning.
5. Uncouple from ST3. I'm sure that the owner of the Town Center senses an opportunity to push through a large project by linking it in time and spirit to ST3. Redevelopment of Town Center to increase profits is of course an owner's prerogative but it should be uncoupled from ST3, be assessed on its merits, and be allowed within the limits of existing zoning laws.

Yours

G. M. Homsy (Bud Homsy)

February 01, 2019

Lake Forest Park mall

Steve, I am sending you this email today because I am very concerned about the development of the Lake Forest Park Mall. I'm concerned that the city will allow the owner to develop it in such a way that will have an adverse effect on our community. A community that we've all come to love and want to protect.

From what I understand, the city has the ability to limit the over development of the mall, ie. zoning regulations, etc.

I understand Sound Transit will be building a parking facility as well.

I haven't a problem with someone trying to make money, I am concerned that you and the council might allow the owners of the mall to create a very congested, unrecognizable mall.

Growth in the greater Seattle area is happening and will continue, we don't have to let it ruin at community.

I hope you and the council have our hearts and wishes for front in your thoughts regarding the decisions you will be making in the future, decisions that that will have a big impact on those that live here.

Thank you for your time.

Robert Graves

Nancy and Robert Graves also submitted the following email correspondence:

Lake Forest Park mall

Mr Mayor, Steve and Council,

We are sending you this email today because we are am very concerned about the development of the Lake Forest Park Mall. We are concerned that the city will allow the owner to develop it in such a way that will have an adverse effect on our community. A community that we've all come to love and want to protect.

From what we understand, the city has the ability to limit the over development of the mall, ie. zoning regulations, etc.

We understand Sound Transit will be building a parking facility as well.

We haven't a problem with someone trying to make money, we are concerned that you and the council might allow the owners of the mall to create a very congested, unrecognizable mall.

Growth in the greater Seattle area is happening and will continue, we don't have to let it ruin at community.

We hope you and the council have our hearts and wishes for front in your thoughts regarding the decisions you will be making in the future, decisions that that will have a big impact on those that live here.

Thank you for your time.

Robert and Nancy Graves

February 01, 2019

LFP Town Center Vision Comment

To Whom It May Concern:

My husband and I attended the DEIS Public Hearing on January 16, 2019 and we were shocked to see and hear what was being presented. Let me start by saying that our family has had a house in Lake Forest Park for almost 60 years. My brothers and I were young children when our parents moved into their home in the neighborhood in 1961. Eventually my husband and I bought my parents' home from them, so we are back in the neighborhood and the house remains in the family. Our children hope to inherit the home and get to live in LFP again as well. We love the area for many reasons, including the trees, the charm of a small community, the walk-able streets and minimal traffic. Even visitors comment about the beauty and livability of Lake Forest Park. I can say, unequivocally, that this sentiment is shared because Lake Forest Park has maintained a manageable density and preserved the presence of trees, streams and relatively quiet streets. The Town Center has been the heart of the whole community, especially since the addition of Third Place Books, reflecting most of these attributes.

I adamantly oppose Alternative II and III in the DEIS. Alternative I has possibility, even though it is described as "This alternative would assume some new development at the Town Center site, but such development would not be in accordance with the VISION and changes in planning and land use regulations proposed under the action alternatives." in the Scope of EIS. The 'action' alternatives, being Alternatives II and III, are not in accordance with the VISION as I have come to understand it, after attending several public outreach sessions. The 'action' alternatives do contain aspects of the VISION, but in a sort of hideous, nightmarish way. Where before we imagined a balance of communal spaces, greenery, commercial businesses and housing, we are presented with housing of up to 1,500 units. Instead of sunlight and open spaces, the Town Center footprint would be filled with buildings that are taller than I thought we had ever discussed, and that would block out almost any sunlight. There would be very little communal space (possible a roof top, seriously) and I can't even imagine the jam of cars coming and going. I don't think any of our household would visit the TC much at all anymore and we generally each make at least two trips a week for one reason or another. These alternatives do not result in expanded civic and community uses, quite the opposite, unless you happen to live at the TC. In fact, it is even stated in the Scope of EIS that Alternative III would support the proposed Vision "encouraging housing affordability, open space, amenities, and other elements, but would assume that amenities would be focused more toward the private use of residents at the Town Center." Focused more toward the use of private residents at the Town Center! Not toward the use of the community members, those of us who actually live in LFP? This is definitely not any part of the VISION as supported by the LFP community members.

Council members, please don't rush this decision. We need more time to get this right. And, please don't sacrifice so much of what we value and love about living here for any reason.

Sincerely,

Michelle Newman

February 01, 2019

Lake Forest Park Town Center

Hello,

I am writing in regards to the proposed development to the town center. While I do think there is room for improvement and modernization I am concerned with the 2 larger proposals of additional housing. I also support my fellow citizens who feel that community needs more time to review the proposals and become better informed.

Thank you.
Razi Leptich

February 01, 2019

Changes at LFP Town Center

LFP Planning Department and City Council,

While we do understand more residents would increase the tax base of our city, 700 units is far and away too large for our sleepy little town. We purchased our family home in LFP more than 15 years ago so that we could have an enjoyable and beautiful neighborhood to raise our young family. The proposals as they are currently being considered are extreme! We envision this new Town Center (with too many living units), extra buses, more traffic, more parking, etc. to be akin to Northgate Mall. No thank you!

This process is being rushed and full disclosure seems to be being hidden from LFP residents. This process lacks transparency, which is of grave concern. The planning and development needs to be slowed down to ensure the development is feasible, and sustainable – and that all citizens have a true opportunity to be “in the know” about plans so that they may comment and be a part of the plans that will change our homes forever. As citizens of LFP we bought our home for some very specific reasons and the plans appear to be slated to strip our reasons for homeownership in LFP away! We feel we are being strong-armed. More time and transparency is needed and warranted.

We request a response to this correspondence.

Thank you for your time,

Janelle Hall
John Hall

February 01, 2019
Town Center Development

City Council,

I have not had opportunity to attend the community meetings to express my concerns so I am sending this email in order that these concerns can be included with those of other residents. I have lived in Lake Forest Park for 29 years and am currently raising my two children here. We choose Lake Forest Park for its community and appreciation of nature.

This development of the Town Center is one in which everyone in LFP has a stake. I will respond using the three question format asked of residents:

1. What elements are important to me?

- low building height so avoid a 'wall effect' along Ballinger
- minimum number of residential units
- similar mix of retail/commercial that exists now available to everyone
- a town center which is not overwhelmed by building height

2. Potential Impacts

- traffic gridlock due to the proposed 1200+ residential units
 - Most people will continue driving cars
- building heights that create a wall effect even when the height is varied
- alternative #2. #3 unacceptable
- overflow parking into neighborhoods should be avoided
- building heights in alternatives #2 and #3 are more suitable for cities with a larger commercial business base; ie: Lynnwood. The number of residents will be too concentrated for the space of the Town Center

3. Mitigation measures

- bridge over 522 due to the expected increased traffic
 - prevents vehicle -pedestrian collisions
 - sufficient parking
 - the current town center lot is already full of cars on a daily basis.
- Adding residential units will only exacerbate the crowding and traffic problems.

Thank you

Jim Kelly

February 01, 2019

Comments: Non-project EIS Scoping for the Town Center Plan

Dear Mr. Bennett,

As a 32 year resident of Lake Forest Park, I would like to submit my comments on the Non-project EIS Scoping for the Town Center Plan.

I prefer Alternative #1 Conceptual Planning Scenario. If the figures are correct, it allows for a reasonable number of apartments and requisite parking places, while keeping within current

zoning restrictions. The appeal of Lake Forest Park as a beautiful and unique city and community should be preserved as much as possible. Alternatives #2 and #3 are way too large. The huge increase in population and necessary parking and resulting traffic are completely avoidable. We already struggle with too much traffic at the convergence of Ballinger Way and Bothell Way.

We can have thoughtful, modest growth, as envisioned by the various focus groups over the years - but the imposing buildings and density required in plans 2 and 3 are way too massive. So many cities have lost their unique character when these giant apartment projects have been built in their core space. Our city council should be our first line of defense against this type of over development.

Thank you for your consideration.

Katharine Hatch

February 01, 2019

town center rezone

Please do not support the rezone of the town center. The proposed development would have great negative impacts on our community, traffic, environment, safety, schools, accessibility and overall neighborhood.

Please do not rezone the area. There has not nearly been enough public notice or time for education. There has not been enough consideration to the impacts of this proposed plan.

Thank you.

Susan Miller

February 01, 2019

DEIS comments L Pedigo

Please find my attached PDF for public comments related to Town Center DEIS.

Thank you

Lisa Pedigo

<SEE ATTACHED LETTER>

February 01, 2019

LFP Towne Center Development

Dear Mr. Bennett,

I am writing to you as a resident of Lake Forest Park for the past 23 years. During that time I have lived on Ballinger Way, and now am in Sheridan Heights. I have witnessed an alarming increase in traffic and congestion on Ballinger Way, Bothell Way, and through the neighborhood back-streets of Sheridan Heights and other areas in LFP. The traffic on Ballinger Way over the 19 years we lived in that location deteriorated considerably, to the point it was difficult to enter or leave our property at certain times of the day. Hence, it is with concern that I learned of the plans for the possible addition of up to 1500 living units located at Towne Center. Despite the plans for the parking garage and the assumption that many of those people will use transit, it is hard to imagine that the current traffic issues will be improved.

Proportionally, development to the full scale of what is on the table seems beyond what is reasonable for the location and space available. It is unclear to me that this level of expansion is truly consistent with the vision for the LFP community or wise in terms of our environment and the quality of that for all who choose to reside in LFP.

In and of itself, development of the center is not necessarily negative, but in my view expansion of any level needs to be supported by further environmental studies, at least a second DEIS. The current DEIS minimizes the impact on traffic and congestion. It has been stated that younger generations will choose not to own vehicles, that everything will be local and accessible. It is hard to imagine that employment for the additional population will be available within the LFP footprint. It is unknown whether transit from LFP to the 145th light rail station will be an attractive option or if having to transfer will move people back into vehicles to make daily commutes to work in Seattle or other areas. In a society that is largely inactive, it is also questionable to suggest that biking or walking to work will be a substantial or practical choice for the majority to reach work destinations.

Beyond the traffic I have other concerns in regard to such things as the handling of additional "gray water", sewage treatment and the effect expansion will have on our streams that have only in recent years seen the presence of salmon.

The proposal and process seems to be on fast forward. In the end this does not serve LFP well in terms of long-term development, nor will it result in a thoughtful plan for creating a LFP that maintains unique characteristics and a sense of community that is rare within the greater Seattle area.

The development process needs to be delayed and further data on environmental impact collected to make a reasoned decision on the future of LFP.

JoAnne D. Whitney

February 01, 2019

The Lake Forest Park Project

Hello,

Not sure what kind of input from citizens is taken into account. I would like to see condos instead of apartments developed. A lot of us long time LFP residents would like to downsize, but to where? Plus owners are more invested in their cities than renters.

Thanks for listening.

- Lanell

Lanell Aoki

February 01, 2019

DEIS Comments for the Lake Forest Park Town Center

Dear Mr. Bennett,

I want to express my opinions regarding the DEIS for the Lake Forest Park Town Center Plan. I have serious concerns about the proposed housing density and the impact on traffic, the environment and the overall quality of life.

In terms of four specific areas, my thoughts are:

Housing density

- All three of the proposed Alternatives (700, 1200 and 1500 residential units) are grossly out of scale for the area and are not in accordance with the community's vision
- Such proposed expansion would lead to as much as a 30% increase in population and concentrated all in one area which is unacceptable
- The size of the buildings would be overwhelming and not fit with the community and environment
- Constructing 200-250 units would provide a more balanced approach, allowing for adequate assessment of impact and need
- Additional housing options throughout the community could be explored and would blend with single family residences

Traffic

- SR522 and SR104 already are at or, many times, over capacity
- The two roads are bottle necks with few or no options to widen
- Residential streets can not handle through traffic avoiding SR522 or SR104

- We need to safeguard pedestrians making their way to Town Center or walking in the neighborhoods
- Access in and out of Town Center is an issue for everyone and in particular for first responders and vehicles supporting infrastructure
- Commuters arriving/leaving the parking garage will compound traffic problems so it is essential to mitigate traffic where we can, i.e., limit the number of residential units

Environment

- The Town Center and surrounding area are on wetlands requiring a cautious, thoughtful approach related to development
- Completion of the Lyon Creek Flood Mitigation Project reduced the risk of flooding. It would be unconscionable to build in such a way as to undo that good work.
- Steps need to be taken to limit the amount of impervious pavement and to provide green areas required for drainage
- Balance amount of construction with realistic requirements for parking with open green spaces
- Protect the streams and preserve the tree canopy

Quality of Life

- Preserve what makes LFP a great place to live - nature and community
- Third Place Commons is the heart and soul of the community and needs to remain a central draw, as well as the Farmers Market
- Our Town Center is more than a transit center or a housing development and has a greater purpose than creating revenue for an owner

Thank you for the opportunity to provide input. May these comments, along with the others you receive, be very seriously considered. As the process continues, may it be transparent, truly a collaboration and representative of the community. And may it take the time necessary to do it properly; it is worth it.

Best,

Martha Dimmers

Lake Forest Park, WA Resident

February 01, 2019

Comments to Town Center DEIS

Dear Director Bennett,

Attached, please find some comments I prepared regarding the DEIS for a re-zone of the Town Center which the city published.

regards,
---andy

Capt. Andrew Reay-Ellers

<SEE ATTACHED LETTER>

February 01, 2019

DRAFT Environmental Impact Statement (DEIS).

Regarding the DRAFT Environmental Impact Statement (DEIS).

I do not want the town center to be developed in a way they will include new residential housing at all.

I DO NOT think it is needed.

I want the city to further pursue and encourage developing rules and regulations for ADUs (accessory dwelling units) which LFP has already created guidelines for to meet housing needs and to absorb the appropriate amount of growth expected as a result of growing families and aging parents as well as to meet the need for affordable housing for students etc.

I want the city to pursue this concept and make LFP the model city that evolved in an economical and organic way that met the needs of a divers population through a well thought out ADU culture. There have been some great proposals on this by LFP citizens and I want you to research and implement them.

We are unique and I want to evolve in that way.

Our streets and infrastructure are maxed out and will be further pressured by the nearby developments around us. We don't need more high density residential structures at the town center. We need a town center that will serve the neighborhoods of Lake Forest Park that are now growing at an appropriate rate as it is.

Neighborhoods of Lake Forest Park will grow at a rate that's appropriate for the GMA without excessive development influence.

We need a town center that will serve us. We don't need the extra housing at the town center.

I want the town center to be more of an open, breathing space with large set backs of at least 60ft or more with ample parking that encourages shopping and entertainment that will attract and allow space for people of neighboring cities to come and mingle with us.

I would rather see a few more office spaces and more local employment opportunities than more housing. We don't need more housing there.

We need a town center that will serve our community.

I don't want an over congested town center that will be more of a hindrance than an asset to the people that live here. I want this city to retain it's connective neighborly culture.

I think over developing the town center with residential housing will permanently alter the character of Lake Forest Park and will be forever remembered as a mistake.

Thomas K Hoffman

February 01, 2019

DEIS Town Center

Dear Mr. Bennett and City Council,

As residents of Lake Forest Park for 58 years living on Lyon Creek, we are providing public comments regarding the Town Center Plan DEIS, published January 2nd, 2019.

We are not adverse to change and development. We were looking forward to what the possibilities would be that would capture our LFP environmental culture and move forward to build housing for Seniors and those who cannot afford a house, or want a house.

However, what we have slowly begun to learn - thanks to community organizing efforts to educate the citizens of LFP- is that the city DEIS proposals ignore what I believe to be beneficial to our community and environment and give advantages to the developers who are interested in our community for profit.

We are writing to ask you to simply **stop taking action** for now and **answer the questions and concerns of our LFP community** who have disagreements with the DEIS, and to do so **in an open transparent forum where we can hear answers** from our elected officials, planner, Merlyn Gier, and OTAC.

In this way, we as a community can find a solution that will work, and allow us to feel like we can have confidence in our government instead of operating out of confusion, frustration, and mistrust.

In case you don't know the history as to why the City of LFP exists in the first place, I am sending it here.

"For 50 years the all-resident status remained intact for the entire acreage originally platted as "Lake Forest Park." In 1961 this situation changed. Between 1956 and 1961 **a land-use controversy** between King County and Park residents became one of the most resisted land-use changes in the Greater Seattle area.

This resistance stemmed from the residents' desire to protect the community's valued all-residential character laid down by covenant since 1910 and vigilantly guarded by successive groups of community leaders. **At issue: commercial zoning for Block 14, Lake Forest Park Addition, to permit a new owner to establish a shopping complex on the block's 24-acre natural marsh near the Bothell Way entrance to the Park.**" (Growing Up With Lake Forest Park Vol. II, pg., 14.)

Eventually King County going against the residents of Lake Forest Park allowed the development of the Town Center and covered the natural marsh, and showed them plans that looked quite different from what the residents ended up getting. This is when the residents decided to incorporate and develop their own city so as not to be misrepresented by entities with a purpose not reflective of the community.

It is needless to say quite sad, that the city that we formed to represent us has now become what feels like our nemesis.

Stop your action, answer our questions, work with us and represent our community.

Sincerely,

Sadie Yamasaki
Sally Yamasaki
Lina Benson
Lara Benson

February 01, 2019

Town Center development comments

Dear Sirs,

I would like to present some comments on the proposed Lake Forest Park Town Center redevelopment, as outlined in the January 2019 Draft EIS. We have owned a home in LFP for over 30 years, having moved here to raise a family and enjoy the vibrant local community. The Town Center has always been the focal point of commercial activity and civic engagement. The massive and relatively sudden changes outlined in the DEIS threaten to undermine, if not destroy outright, the character that makes LFP a great place to live. The city could very quickly go from a distinctive, welcoming community to merely a residential zone of Seattle. A place where people sleep and store their belongings, but otherwise **work and relax** at the other end of the transit line. The Town Center will change from a resource enjoyed by all of LFP, to a place effectively exclusive to its residents. And that will be the end of Lake Forest Park as a real community, and make it just another generic place.

I have some specific concerns about the impacts of the 3 alternatives on the existing infrastructure and quality of life in LFP, and the speed with which they would be implemented.

In particular, on Page 10: "Given existing long-term lease agreements at the Town Center, it is anticipated that redevelopment would occur incrementally over time, in multiple phases (with anticipated completion of all phases by 15 to 20 years or longer)." Given the current housing shortage in the Seattle Metro area, I expect the **residential** portion to happen very, very quickly. Once planning approval is given, the apartment buildings could be built and occupied in a year or less. This will maximize the financial return to the developer, who needs to get the units in production before any potential drop-off in regional housing demand. The commercial development (and adding the proposed amenities) could take many additional years.

Additionally, the demographics of the most likely tenants are young, mobile professionals who tend to stay for 1-3 years, then move on to another city. These people do need housing, but they don't generally become active in the community. Let's not sacrifice what we do have just to grow population numbers.

- Parking

This is probably going to be the single biggest immediate impact. The current parking lot runs near capacity, serving mostly the retail outlets. When the Farmer's Market is open, parking becomes problematic and we avoid the mall at those times. We walk to the stores in good weather or when we are planning few purchases, but it's not practical to carry large items or bags of groceries long distances.

Adding hundreds of new housing units in this limited area is going to overwhelm the remaining parking spaces, as well as the neighbouring streets. You can not assume that the new residents will not bring one or more cars with them. In other cities that have tried to permit apartments with no parking, the residents

brought their cars anyway. They then consumed every available on-street space in the surrounding neighborhoods, denying access to the existing homeowners. This will happen here, unless steps are taken at the outset to prevent it.

The lack of parking will, for the most part, deny access to the stores, planned open spaces and amenities for the majority of LFP residents. Unless you live within a block or two of the center, you will not be able to reliably park. The older people who live more than a few blocks away depend on their cars to get to the stores, and carry their purchases home. For that matter I don't see **anyone** throwing bags of heavy groceries on their bikes and pedaling up to Horizon View or the Grace Cole area. This problem will reduce the Town Center from a resource for the entire community, to an exclusive perk for the residents of the complex.

As per Page 88: "Parking—The multifamily housing units assumed to be built in the northern section of the Town Center site would eliminate some of the existing surface parking under Alternative 1. However, it is anticipated that developers would maintain or build adequate supply for their new needs and in consultation with City permitting requirements. Because it is expected that developers would continue to provide parking supply as dictated by market need, no adverse parking effects are expected under Alternative 1." Note: "anticipated", "expected" - but not **required**.

Any developer has a fiduciary obligation to obtain the maximum return on their investment. Housing units generate income, parking spaces for those units do not. They're overhead, and if the developer can simply not provide any, they won't. Given the former wetlands nature of the property, it's going to be very expensive to build below-grade parking, so I don't expect that to happen voluntarily. In the absence of an LFP legal requirement to provide dedicated parking, the housing operator will simply divert their tenants to the available mall parking, and the surrounding streets. Thus denying Town Center access to the rest of LFP residents who live beyond walking distance.

- Financial

The DEIS does not directly address the financial impacts to the city from the loss of commercial space at the Town Center, the loss of property tax revenue from the MFTE, and the mitigation and remediation expenses that will inevitably result from the redevelopment. It has to be assumed that property taxes on the surrounding single-family residences will be increased to offset the impacts of the development. This will price the most vulnerable property owners out of the city, and accelerate the urbanization and densification of the area.

- Schools

Whoever prepared this section (Page 43) hasn't looked at a map of the area: To wit:

"If there were students within the Town Center planning area in the future, they would presumably attend Lake Forest Park Elementary due to its proximity, as well as Kellogg Middle School, and Shorecrest High School"

Brookside Elementary is actually much closer to the Town Center than LFP Elementary, and would presumably feel the brunt of the effects. And yet it's ignored completely in the report, which tells me that this section was not well researched. It's not possible to accurately forecast the number of students who will want to attend the schools, but there will be an impact. Class sizes will increase, as will bus ridership. The Shoreline Transportation office is already near capacity, with bus runs canceled or delayed due to staffing shortages.

Since apartment complexes are built and occupied much faster than single-family housing, there is the possibility of a flood of new students moving into the district over a summer, then descending on a school system unprepared for the numbers.

- Retail

There are a number of existing retail outlets in the Town Center that are important resources for the community. Specifically, Albertson's (the only grocery store in LFP), Ross, Rite-Aid, Ace Hardware, Third-Place Books, Mud Bay, and the food outlets. These provide ready access to goods and services within walking distance (or a short drive) of much of LFP.

Alternative 1 preserves most of these businesses (and their jobs), and hopefully without too much attrition.

Alternative 2 essentially eliminates the commercial core of LFP. Yes, there is a small amount of retail space set aside in tiny spaces, but these can only be filled by small specialty shops. We would almost certainly lose Albertson's, Ross, Rite-Aid, and Ace due to the size constraints of the retail space. The summer Farmer's Market is a poor substitute for a local grocery store, as are the convenience stores mentioned in the DEIS.

Alternative 3, while increasing the **total** amount of commercial space, suffers from the same size problem as Alternative 2. This is a community where people live every day – we don't need a dozen tiny boutiques, like some of the tourist-heavy areas such as downtown Edmonds. The large retailers servicing the community require a certain amount of square footage to be viable, and I don't see that in either of these alternatives.

The end result of #2 or #3 will be more people getting in their cars and driving to Kenmore or Mountlake Terrace for their everyday shopping. Add to that the additional residents from this project who will **also** need to travel outside the city for groceries, clothing and the like, and your traffic problems just got worse.

- Communications

Professionally, I am a Senior Engineer at Sprint. I've been in the Telecommunications industry in the greater Seattle area for nearly 40 years. The Internet infrastructure in Lake Forest Park is pitiful compared to comparable communities, and roughly 10 years behind current practices. The DEIS references the Communications impacts in Chapter 3.4, and makes some incorrect assumptions.

Comcast has a virtual monopoly on broadband Internet delivery within the city, both residential and commercial. This is apparently due to a franchise agreement with the city making them the sole cable provider. Thus LFP residents and businesses are charged higher rates and see poorer service than neighboring communities, such as Brier. There, Comcast has to compete with Frontier for residential service, so their residents pay much less than we do, and get vastly better service.

CenturyLink maintains a token DSL service in LFP. It doesn't meet the requirements of even minimal broadband, and they have stated to me that the offering will never be improved. They keep it as a competitive weapon to prevent Frontier from delivering high-speed fiber broadband to LFP (again, leveraging a city-provided franchise).

Verizon **might** deliver some form of fiber Internet to the Town Center (only), but given their history of non-deployment in cities across the country, I wouldn't count on it. This of course, will do nothing for the majority of residents in the city outside of the Center.

The DEIS also references this: "Sprint-Nextel facilities exist along the Burke Gilman Trail, which runs parallel to and on the south side of Bothell Way NE directly adjacent to the Town Center." (3.4, pg.57) This fiber is part of the SprintLink national backbone. It can not, and will not ever, provide local Internet to LFP. There simply aren't the facilities to provide such services, and Sprint is unlikely to spend the millions of dollars to do so. Their consumer focus is *wireless*, after all, so why is this even listed as a resource in the DEIS? In other words: just because Delta Airlines flies over LFP at 30,000 feet, doesn't mean they are going to start landing here.

Given the technical nature of providing telecommunications services, and the propensity of providers to promise services that they have no intention of delivering, I expect some token offerings for the new residential development only. The rest of LFP will continue to languish with sub-standard communications services, enforced by City franchises, until some disruptive technology emerges.

In summary, I would urge the City Council and Planning department to slow down the rezoning process, and give time for the community to adapt to the changes. Sound Transit has indicated that they will not start the permit process for the Park&Ride garage for at least 3 years, so there's no immediate urgency. Of the proposals, Alternative #1 retains most of what makes the community livable. The other plans essentially gut the heart of LFP, and end community-wide engagement as we know it today.

Thank You

Mark Anacker

February 01, 2019

Development of Lake Forest Park Town Center

Dear Lake Forest Park City Council members and City Planner Steve Bennett,

I am a resident of Lake Forest Park living at 3325 NE 181st St. We moved here in 2012, and chose Lake Forest Park for the tight community feel, complete with a central town center which attracts residents to interact and relax together, and the natural forested avenues of the residential streets. These attractions and the community make Lake Forest Park a unique and desirable place to live.

I have been following the Lake Forest Park Town Center development possibilities and am very concerned at the fast rate that plans are being made. I know that I am not alone in these thoughts. There is much confusion and misunderstanding about how the development will proceed. The different proposals that are being considered and their impacts on the space and the town residents have been presented very rapidly and without time for residents to have opportunities to understand what each entails, the different zoning possibilities, and the outcomes of these decisions. I worry that the haste to build without adequately thinking through possibilities will serve us poorly in the future and could fragment our beloved community.

I write to respectfully request that you please slow this process, and put a freeze on decision making while we, as a community, catch up on the possibilities being presented and their impacts. There is great need for opportunities for the community to ask questions of the council and the planning department for clarification of the development of our town center. I would like to make sure our town center reflects the needs and desires of the people who live in Lake Forest Park, rather than moving in ways that may remove the community feel and will be regretted later.

Thank you for considering this request.

Sincerely, a concerned citizen,

Dana Campbell

February 01, 2019

Town Center Rezoning

Mr. Bennett,

I've read the comments and materials provided through NextDoor and wanted to add my voice for option 1 if one must be chosen.

I've lived in LFP since 1990 and loved every moment and interaction with my neighbor, Town Center businesses, and with City Hall. I've volunteered to help in several community events and clean-up campaigns.

I know that Sound Transit's plans for red bus lanes on 522, includes building a multi story structure (the last time I saw their plan it was in the area of Bank of America and possibly City Hall. Our elected leaders I believe needs to approve a location for such a structure by a date set by Sound Transit. Why not make this decision first?

This would allow more time for us residents to have a chance to learn more about why City Hall believes the addition of high rise, density is a wise choice for the future of this great City. I don't recall receiving any educational materials in the mail from the City giving me information about these changes in zoning which drastically changes our single home dwelling attraction with some small apartment complexes. I'm aware of existing tall buildings on SR522 at the South end of the City were already here when I moved here 29 years ago.

I know that many if not all malls in the North end of Puget Sound are struggling financially forcing them to rethink business models. So when the land was purchased from the City by a developer, I was expecting changes. However, the proposed plans have removed most of the small businesses that I use weekly. This is forcing me to drive (since there is minimal and infrequent bus services - I just received notice of the metro community bus plans) to other cities and take a lot more time and use more gas every day!

My plans were to age in place this beautiful city, but the City planners and leaders apparently are seeking to completely change to a higher density urban area than keep us a suburb.

I hope it is not too late, to add my voice of moderation. Seven story buildings like the ones across from Kenmore City Hall, are nicely done, but they are on a much larger footprint and in fact they added good eating places. Your plan eliminates all of the places I walk to for a nice variety of meals.

Thank you for your consideration,

Jeanne Semura

February 01, 2019

Town Center development

My husband and I have lived in Lake Forest Park for 33 years. We use the Town Center in many ways. Love the bird store, our library, Ace Hardware, the honey bear bakery, we also have a membership to Planet Fitness. What we mostly appreciate though, is Third Place Books which I consider the heart of our LFP community. This is the biggest and nicest addition to our community. When Third Place Books arrived, it changed our community from nothing to a wonderful place to live in. What a treat to browse the book store, shop for a good read, here we can enjoy live music, listen to visiting authors or just have a cup of coffee and chat with neighbors who also frequent the store. This is an important and lovely meeting place for all of us in the surrounding area, and I am very afraid of losing this place, or ending up with something not as lovely and inviting after a remodel of the Town Center. I can not imagine it moving to the top floor of a many story parking garage and at the same time being able to transfer its welcoming warmth. Or even worse, lose Third Place for good? I have always said: If Third Place Books goes away, I will move too.

I am also very concerned about the plans of adding lots of new housing units on the Town Center area. I understand the need for some housing, but the numbers of new apartments are frightfully large, especially in option 2 and 3.

We were told, at the community meeting we attended, that the plans are not set, and that the plans we were shown were just sketches of what it might end up looking like. Why not take some time and figure out what these 3 options really will be like before a vote is taken? So we know what the reality will be in each option.

Everything seems to be happening very fast, why not slow down and really think through what our town center should be like, because once a change is made, that's it, we will be stuck with it for the future.

The town Center could use some updating, and some affordable housing units would be a great addition, but when it is talk about a complete change and perhaps over a thousand new apartment units, it feels to me like all of the sudden we will be living in a community we no longer know, a community that could change so drastically that I will no longer feel at home here.

And where are the green spaces in these plans? What we saw from plans at meeting, a strip by Lake city Way is what was called the open green space.

If we as home owners in LFP want to take down a tree on our property, we have to get a permit, and also replace the tree we take out, with a new tree planted in its place. Should not our Town Center be representative of LFP regulations? Should we not plan for large open green spaces and plant trees? We have a chance to develop something that reflect our city of LFP, something we will cherish and love in the future too. Something we will be proud of. Not masses of tall apartment complexes, with little or no green space or park areas, and way too many people with way too many cars added to the community.

The traffic in the area of the Town Center is already a challenge. The potential of a couple of thousand people moving in to the Town Center area, with their cars, is going to add much frustration and grid lock. I can't believe we were told the traffic impact was not going to be much worse than it now is. How can that be explained.? How can all these people move in and it not impacting the traffic situation?

I have so many concerns, here I am just listing a few.

At least.... Please, slow down. We need more dialogue about this. More information. More input and studies on the environmental impact these plans may have. (water, stream, traffic in the immediate area of the Town Center and on our smaller neighborhood streets that are already seeing much more traffic as people try to find alternate routes to and from where they are going)

Lets design something thoughtful , something that can encompass both growth (some affordable housing apartments..... and not as many as suggested in plan 2 or 3) a green space / park area we can be proud of and that reflect our city's name Lake, Forest, Park.

A welcoming City Center... somewhere we still want to visit and meet our neighbors without struggling through traffic just to get there.

A City Center that will be known for being different and unique.

Please slow down and do not jump into these plans.

We want to live in a community where we thrive. And where we feel we fit in.

Sincerely,

Eva Isaksen

16726 32 Ave NE

Lake Forest Park, WA 98155

PS. I am from Norway. My hometown Bodø in Northern Norway is going through a lot of changes. It is growing and expanding very fast. (ca 17 000 people there when I grew up there, now there are 50 000 people and the numbers are growing.) Although I spend some weeks there at least once a year, every time I go there, I am amazed by changes done since last visits. A city that is growing and changing fast. Not all changes are to my liking, but I am impressed by the focus on not only on the practical side of growing , like adding housing and apartments within the city (carefully placed where it makes sense), adding good bus service, grocery stores close to each community, low income housing mixed in with much more expensive and luxurious homes, always many parks, play grounds etc, but also the visual beauty of the buildings. There are always architect contests (architects from all over the world submit) when it comes to designing new public buildings, community centers and apartment buildings and the focus is always on use and how it all fits together in the best way for the people that live there and will be using the areas.

The new library that was recently built, is one of several focus points and meeting places in the city. A building that has won many international prizes for its innovating design, but also for its well thought out space and placement. it has become a center for the citizens and is very much loved and used.

There are book readings, free music concerts, visiting artist and exhibitions in the gallery connected to the library, a wonderful cafe always full of people. Arranged discussions on different topics, etc etc.

And now one of the focal points and centers in the city. A very alive building.

In many ways it reminds me of the role Third Place plays for our LFP community. I would love to see our new Town Center have this as its focal point and then design the rest around the community center. Not just move the community center to the top floor of a garage, like an after thought.

Let's be creative, find good architectural solutions that addresses the issues the citizens of LFP are raising. Work with the citizens and listen to them. Do not dismiss the results they arrive at after working seriously on coming up with a community plan that is a good fit.

February 01, 2019

Town Center and DEIS - Please Slow Down

Dear Mr. Bennett and Lake Forest Park City Council,

My husband and I are writing to express our concerns regarding the proposed changes to the town center. This is a difficult letter to write because there is so much emotion built up behind it. The bottom line is that we are against the huge changes being considered for the town center region. While we understand the need for increased housing and parking options in the greater Seattle area, we feel strongly that the direction this is headed is wrong on so many levels.

My husband moved to the area in 1962. Twenty years ago we moved into his childhood home. Through the years we have seen incredible changes, both good and bad. With increased population comes all sorts of issues. Our main concerns include the environment, traffic, emergency services, and a loss of a sense of community.

My husband grew up in the woods - Sheridan Hills was a forest in the 60's. As you well know, the center once was a wild wetland. As a child, my husband used to find several varieties of salamanders (including the Pacific Northwest Giant Salamander!), snakes, toads, frogs just to name a few special friends all throughout the region surrounding the center. Now, they're all gone. Now, we're a city. Trees are regularly taken down all around us despite seemingly strict regulations. In fact, we have two landmark trees right next door slated to be taken out despite the fact that the local ospreys hang out there during the summers - I hope the trees are diseased and it's not simply for a better view. We are deeply troubled by these negative effects on the environment. While the plan addresses the environment, is it enough? Could it be better?

We have also seen a dramatic change in traffic and road rage in front of our home. Once a nice country-like road, it is now apparently considered a main arterial. We often experience impatient and dangerous driving with the increased traffic, especially when those of us with hidden driveways try to pull into our homes. Walking is also dangerous. A few years ago, I reported a near-miss while I was in the crosswalk with an elderly dog who couldn't react or maneuver quickly. A fast distracted driver came flying around the corner just south of NE 169th St heading north on 37th Ave NE. I was simply told I needed to be more careful. The root of the problem was disregarded. We have expressed our concerns several times through the years. We have urged those in charge to help us out with a stop sign at the intersection of 37th Ave NE and NE 169th St only to be told no. We expect traffic, near-misses, and rudeness to only get

worse with the proposed plans at the center as this extra traffic filters out into the neighborhoods. If it's already dangerous and we're not getting assistance with this matter now then how will it be once this project goes through?

Meanwhile, we have to deal with neighbors who don't respect the public right-of-way. They claim the street parking as their own which only adds to the dangerous road conditions. Plus, it puts a strain on the surrounding homes that don't have adequate parking available. We anticipate this will also become worse with more people in the area.

Another troubling concern is the emergency service situation. We worry our services will be stretched and unable to keep up with the overwhelming growth. And now there's a possible rezoning for the fire station?

How about our home and property values? Property taxes? We're already financially at our limit. Will we be able to stay here?

And how about our community? Will we lose our sense of compassion, community, oneness with those around us?

There are still too many questions, too many concerns, too much at risk. Please slow down. Please do not allow a huge multi-story complex to take over Lake Forest Park. We accept that change will happen. But, please do not allow over 1000 housing units towering 85 feet high to become the focus of Lake Forest Park. When this journey began, I recall a number much, much lower. This huge number is just too much. Let's revisit the original options that had unit numbers closer to 300. Ideally, we would love to see the center remain as is with perhaps a few updates and minor additions. But, if we allow anything, it should be a project a little less ambitious, more manageable, and safer for the residents.

Lastly, I urge you to read comments on Nextdoor.com. This is affecting the entire area. So many people are worried for the future. Please slow down and help the community. We're the ones who will have to live with this.

Thank you,

Sara and Michel Jolivet

February 01, 2019

DEIS Comment Letter

Dear Mayor Johnson, Steve Bennett, members of the City Council and Planning Commission of Lake Forest Park:

We request that the following comments become a part of the public record, in their entirety.

Our names are Bart Shilvock and Randi Sibonga, and we are 25-year members of the Lake Forest Park community who moved here to raise our family. Both of us are deeply invested in our safe, highly-livable community and its natural environment and we've tried to be engaged and supportive civic participants; as such Randi is a current board member of the Stewardship Foundation and Bart is a member of the Mayor's appointed 2018 Vision Task Force. Bart was one of five Task Force member signers on a letter as part of this process that outlined in detail why and where we felt that the DEIS failed to reflect the Vision document, and the citizen involvement that led to its creation.

Our house is located just west of the Town Center (TC), with Lyon Creek running through the middle of our property. Any significant redevelopment of the mall will likely impact our property in myriad ways because of its proximity, but we've anticipated that inevitability and can embrace the City's purported vision of a more vibrant, pedestrian-friendly Center, with greater diversity of shops and restaurants and quick access to transit. Once we read the City's DEIS, however, evidence of thoughtful, responsible and citizen-responsive plans for development never materialized.

What's clear from the DEIS's representation of the three "options" for the TC development is its preference and promotion of highly aggressive code allowances for building heights and density. These standards are grossly out of step with requirements for density under growth management regulations and policies. They are a clear departure from current and previous task force recommendations. They do not reflect clear and consistent input from the community throughout this process.

The DEIS presents citizens with three alternatives that are really false choices. Citizens have to provide input based on a range of alternatives that build on a flawed low range, making valid comparisons impossible. A true low range would be a number within the existing code, that complied with true growth management targets, community needs and desires, and consistency with what past detailed studies have targeted. All 3 alternatives greatly exceed housing requirements for the entire city of Lake Forest Park for the next 20 years, per King County. In fact, the City adopted standards in 2016 that require 551 units by 2035. What is the basis for this wildly excessive number then, just a few years later? Any number of citizens have asked where the "700" number in Alternative 1 was derived. The standard response has been that the calculation will be explained to us in the comments for the Final EIS. That is not an acceptable answer. At that point, it is too late. What is being hidden and why?

We know that citizens are so perplexed by the City's lack of explanation that requests for supporting documentation for this calculation are being made out of concern and frustration. As citizens, we are (in numbers that are growing every day) frustrated with a process that seems to make it as difficult as possible to provide meaningful input that our City Council will actively consider. We have been faced with lack of time, limited transparency, open forums held in the woefully inadequate Council chambers (followed by comments from Deputy Mayor who was not present, that it is only 25 or 30 activist citizens that are opposed), cancelled meetings, agendas are not being provided in advance for the meetings that are held, a Council retreat that would have afforded the public an opportunity for additional insight was canceled without explanation, and now we are faced with a stubborn refusal to deviate from a timeline that everyone knows is reckless and unnecessary. Today we learned that the COW meeting on February 4 was cancelled without explanation. We are being closed out of the process.

Because of the lightning speed at which the City seeks their implementation (approximately one month from the end of the public comment period to final approval of code revisions), we are left with more compelling questions than answers about the framework the City wants to put in place for the center of our community. The Council would be irresponsible to stick to a plan for the entire site that is built around an old Sound Transit schedule for code decisions on the parking garage – a schedule we were told at the latest COW meeting has been delayed by at least a year. Adequate studies have not been done in areas such as traffic, noise, groundwater, surface water management, parking, canopy, and other environmental issues as have been identified by the Stewardship Foundation. There is no reason that code revisions for the rest of the site could not be delayed, while moving forward on the parking garage code changes. To push all the Town Center code changes through without: data-driven studies and analyses; time to process and consider substantial citizen input; time to fully consider input from the Planning Commission, calls into question what the agenda is and whether the Council is looking after the best interests of the citizens they were elected to represent, or the developer they seem to want to give as much flexibility to as possible. The consultant has written that under a more normal process, this would take months to do. What makes this process different? Getting ahead of a Sound Transit schedule is a red herring. It cannot be the real reason.

Here are the major reasons why we are troubled by the standards for building height and density as represented in the DEIS:

1. **They do not comport with growth management requirements and policies for LFP or our region:** The King County Countywide Planning Policies set targets for housing units growth for communities in the county. The target for Lake Fake Forest Park of adding 551 units by 2035...are now likely outdated.” (Chapter 4.0, page 18). We have added housing stock since that time, most notably at the southern gateway and yet we are expected to accept that the “likely outdated” target has now jumped by a factor of three to 1500 units or more in a community that had an average annual growth rate of .075% between 2010 and 2016? (Chapter 3, Page 14).?
2. **The City seems to be “bonusing” the developer with higher density, reduced set-backs, uniform/grid construction options and less usable public space with no assurance of enhancements for the public good. We are left to wonder if proposed code allowances for height and the commensurate bloated number of housing units are driven by Merlone Geier’s response to their shareholders more than the City’s response to a long and thorough process of community input.**
3. **Impacts to our natural environment, traffic circulation and services have not been fully studied, nor have mitigating efforts been even minimally explored.**
4. **Citizens’ visioning for the development and current code restrictions on height and density are not reflected. The concerns that citizens had for too much height and density was clearly expressed throughout the process by an overwhelming majority of people.**
5. **Clearly expressed was a need for usable open space, building of varied heights, concerns about a canyon affect for neighboring homes, “diversity of outdoor experiences, ability to walk through the town center separated from traffic, consideration of the history of wet conditions and high water table, planting of trees and landscaping throughout the Town**

Center, “requiring a redevelopment master plan”, and other key elements from nearly every goal None of these have been addressed in a meaningful way in any of the DEIS alternatives. No objective person could look at these options and say that they address citizen input adequately. They also create huge risk for the project, especially with regard to water conditions. A worst-case scenario for Lake Forest Park citizens could result in massive apartments on areas that are buildable with water issues in other areas that are too risky or costly for the developer to mitigate, leaving us with a dense housing development instead of a town center that serves all of Lake Forest Park and neighboring communities.

As neighbors to the mall, we want to emphasize that Policy TC-19-2 of the Town Center Vision document has not been addressed:

“New development should be located and designed to blend harmoniously with the surrounding neighborhoods. Special care should be taken to transition between higher intensity commercial or mixed use buildings adjacent to low-density single-family residences.”

No consideration has been given to a “wedding-cake” tiered construction as was documented in Town Center studies of 2005-06 and has been brought up consistently throughout this process. There are not clear definitions of setbacks that would offer some protection, and there has been discussion of a road along the west side of the property. Some shadowing impact has been studied, but the current plans do not ensure sufficient shadowing and noise protection for the existing neighborhood. Further consideration needs to be given to the shadowing impact of 7-story buildings within the site itself, as there is also the importance of usable open space not enveloped by tall, dense buildings.

We strongly believe that putting a full package before the City Council in February of this year is unnecessary and puts the City, and its citizens (taxpayers) and potential risk in a number of areas. This could be addressed by focusing for now on code amendments re: the parking garage only. That would allow the process additional time needed to adequately process and incorporate citizen feedback, and to do the additional studies and analyses necessary to put in place a solid plan for success. To do otherwise at this point incurs risk to the City, to taxpayers, and to the likelihood of a successfully completed project.

Rushing to start and complete the most critical phase in a month on a project that will take twenty years to build, and will define and shape our community for the next fifty years makes absolutely no sense. We must end up with a project that meets the current and future needs of our the citizens and is a reflection of so many who shaped the project and the values we hold in high regard as a community.

Sincerely,

Randi Sibonga

Bart Shilvock

Ms. Sibonga also submitted this separate email correspondence:

Subject: Please know these things to be true...

Good evening, Mayor Johnson,

For unknown reasons, there is clearly a movement among members of the City Council to revamp the Town Center code structure to allow for unfathomable levels of density and height. This movement is being undertaken on a rapid track, without sufficient study or analysis of the potential significant and irreparable impacts to the natural environment and the well-being of our community. There is no apparent emergency or urgency. We are all left with a bad taste in our mouths and a sense that there **MUST** be another agenda at work; one that does not put the best interests of the City and residents of LFP first.

Please read each and every comment submitted by your constituency. These letters were written by people who care deeply about the future of our City, just as you do. And as you oversee and participate in discussions about how to proceed next, I want you to know these things to be true:

1. Not a single neighbor that I have spoken with about the TC development is opposed to redevelopment of the site or adding housing there. Regardless of efforts to portray those who have spoken out against the DEIS as unreasonable NIMBYs or people resistant to change, this is simply not factual.

2. Many of us are losing faith and trust in our city government. This is a harsh reality but I believe that you are a person of integrity who would not want this to happen on your watch. I have been a civil rights attorney for many decades and I firmly believe that the public process must be open and fair; one in which every citizen has access to full and accurate information about civic matters that impact them and meaningful opportunities for her or his voice to be heard. For so many reasons (from cancelled public meetings to unanswered questions about the DEIS, to a timeline that has no reasonable basis), the process underlying the DEIS and eventual code revisions has failed to provide the residents of LFP with these fundamental guarantees.

3. The most important resource in our beautiful city is our natural environment. Those of us who have read the DEIS do not believe that it properly addresses significant impacts to our streams, animal habitat and tree cover and it is essential that the DEIS be substantially revised and expanded prior to any further actions. This is a resource that we can potentially never recover. We are fortunate to live among many biologists and environmental scientists in our community. I serve on the LFP Stewardship Foundation with several of these highly knowledgeable and committed citizens and know that they have raised grave concerns in their letters to you and Steve Bennett about the DEIS's major flaws and deficiencies. I am aware that you are a life-long resident of our City who remembers fishing in our creeks as a child. Without a doubt, LFP's natural environment is precious to you. I sincerely hope that your love for our community and its natural beauty informs your decisions regarding the Town Center in a profound and abiding manner.

Please include my above-stated comments as a matter of record.

With kind regards,
Randi

Ms. Randi Maya Sibonga

February 01, 2019

Comments on Town Center Plan Draft Environmental Impact Statement (DEIS)

Dear Lake Forest Park Public Officials:

My wife and I are lifelong residents of Lake Forest Park. We were both raised here from the time we were born, and as adults have chosen to buy a home and live here. We chose to remain here as adults because we love the town as it has been and as it is today. While we understand that growth and change is inevitable, the three alternatives presented in the City's DEIS are grossly out of scale with what this community can or should allow in terms of development. We strongly oppose all three alternatives presented in the current DEIS. Further, the public engagement process and the speed at which it is occurring is irresponsible given the magnitude of impact these decisions could have on our community. We ask that a revised DEIS be prepared and recirculated for public review and comment before a final EIS and decision.

Much work has been done by previous citizen groups and LFP public servants to guide growth in our city. This work, epitomized by the Lake Forest Park Vision Document and the Lake Forest Park Comprehensive Plan, should be the foundation for any new plan. It is our understanding that the Vision and the Comprehensive Plan contained growth projections ranging from 400 – 551 additional housing units, across the city. These numbers seem like the maximum feasible growth in a city of 5,000 existing households (~10%) looking to maintain their community's character, especially if all growth is to be concentrated on the Town Center property. We ask that a revised DEIS be drafted to include alternatives with housing unit growth in the 400 – 551 range, consistent with the Vision and Comprehensive Plan. We would also like to see alternatives with a greater proportion of the Town Center redevelopment dedicated to retail, commercial, and open space than is allowed for in any of the three alternatives in the current DEIS.

This DEIS, or future revised drafts, should address in much greater detail the impacts and associated mitigation measures for the three alternatives. In particular: traffic, schools, shading of neighboring properties and streams, utilities infrastructure (power, water, sewer, stormwater, etc), and environment.

Finally, the City should slow down and pursue a more proactive community education and outreach effort before approving any DEIS. More public input and consideration, including a new and/or revised DEIS, and a longer schedule before adoption of a final EIS are what we would like to see.

Sincerely,

Kyle R. Victor
Chelsea M. Victor

February 01, 2019

DEIS Comments

Dear City Council and Planning Commission,

As a long time resident of Lake Forest Park, I would like to provide input on the DEIS. We have lived here since 1995 and seen various businesses come and go at the Town Center. When Third Place Books and the Commons were developed, it made a huge impact in terms of providing a real community center for LFP. The rest of the Town Center could definitely use some upgrades and incorporating some housing makes a lot of sense. Concerns are as follows:

1. Process. While welcoming the idea of improving the town center and adding housing, the process seems rushed. The three alternatives proposed allow for drastic increase in number of housing yet traffic and parking are not indicated to be of any concern. Infrastructure does not seem to have been addressed yet. Further study seems warranted here before committing to such a huge development.

2. Number of housing units. Even the lowest number (700) is too excessive for this small of an area. I understand that at one time, the proposed/allowed number was lower. Are there other areas where housing density can be added in addition to the Town Center?

3. Parking. The current lot is close to being full at times. Where will these thousands of new residents park? While it is a nice idea to think new residents in the Town Center would not have cars, this seems wildly unrealistic. If they are going to park on the side streets, this will have a significant negative impact on the neighbors who won't have street parking in front of their homes for visitors, etc. Will the town center still be a welcoming place for current residents (who are not within walking distance) to shop, work out at the gym, go to the library if we aren't able to park or have to pay to park? If current residents have to go elsewhere, this will be a loss of sales tax revenue for LFP and a loss of the community we gained with Third Place Books development.

4. Traffic. The two traffic lights in and out of the town center are already backed up during busy traffic times. We have to sit through multiple lights at times. It's a gridlock both at the four way stop by Ace Hardware and by Starbucks when those lights are red. Incorporating both the 300+ commuter cars and 1000's of new residents seems impossible.

5. Green space. Including planter strips in front of buildings and streets is a sad representation of green space in a community known for its trees. The 3 designs (understand they are not final) lacked any sort of creativity in terms of providing an area representative of Lake Forest Park.

6. Infrastructure. Before committing to such large developments, more consideration should be given to the impact on utilities, water, sewage, fire protection service, etc. Have impact fees been considered to offset the increased burden on LFP resources as well as to support insuring we are developing a strong community setting that includes green space and places for community gatherings and events?

7. LFP Community. Please don't consider placing a commons area on top of a garage. This is the opposite of creating a vibrant LFP community space and would surely kill what we have now.

Sincerely,

Laurie Hildahl

February 01, 2019

LFP Town Center DEIS - comments

Steve, attached are my comments on the DEIS.

I am sorry to say that having written an EIS for a multi-million dollar environmental project for a large paper mill, I find this document to be appreciative of city and community values, generous in its assumptions, and lacking in thorough analysis of environmental impacts.

All the best,
Tyson Greer

<SEE ATTACHED LETTER>

February 01, 2019

Letter From Ethan Robertson RE Town Center Development

"Dear Mr. Bennett and City Council,

My mom goes to a lot of meetings. Some of them are at our house and I listen in from our loft. Sometimes I play legos or read books during the meetings. The last meeting was about our neighborhood. I love our town. My favorite things are Third Place Books, being able to ride my bike around the neighborhood, and I like that there is more nature here. My family loves trees. Please don't let there be less nature.

I am really looking forward to going to the Town Center when I am older to hang out with my friends. I'm seven years old, so it's gonna be a while before I get to hang out down there. But, my brother is nine, so it's gonna be sooner for him. I see big kids doing that all the time. Have you met my mom? She's a little crazy, but I know she loves me. So I don't think she would let us go if it were a big traffic jam all the time with tons of people. Plus, why would we go if there was no more Third Place or other stores we like? Are you going to make any places for big kids to hang out?

I am wondering what are you planning to have it look like? I hope that it has lots of room to walk and ride my bike. I hope it could have a bigger library with even more books and stuff to do. I am dreaming of a skate park and a robotics center where we can build and fix things.

I also want to ask if you're really going to take down the town center soon? Please do not. I really love the way it is right now.

It's kind of hard for my to think about the future. I'm glad that there are smart people working on this project. Please think of me and my friends and my brother when you are picking out what to do.

Sincerely,

Ethan Robertson"
Resident since 2011

February 01, 2019

Lake Forest Park Town Center improvement plan DEIS.

Dear Lake Forest Park Public Officials,

Please consider to give more time for the public to give comment on this project.
I wonder that the Sound Transit proposals are the driving force the current timetable for expedited review and decisions.

Can you separate these two issues?

Thank you for your consideration,

Irwan Budihardjo

February 01, 2019

Comments on DEIS

Greetings Mr. Bennett and Council members,

Please see my attached comments on the DEIS.

Thank You,
David Gelgisser

<SEE ATTACHED LETTER>

February 01, 2019

Letter RE Town Center Development

Dear Mr. Bennett and City Council:

As you know from your many attempts to 'ask the community for input on our dreams and visions for the Town Center', we are a people who yearn for opportunities to safely walk and bike in our neighborhoods, for nature preservation and improvement, and for authentic community-building spaces.

When you say you want to 'improve the developmental prospects' of our town center, you make us very nervous. We want you to focus on creating code that exceed our current quality of life. We're not looking for green space and open space in buffers along the edges, rooftop gardens, or festival streets that mainly act as parking or for traffic adding up to 3.9 acres. We're looking for actual, authentic gathering spaces.

We are strongly opposed to zoning that permits more than 500 new residential units at the town center or anywhere in LFP. Even this number seems outrageous when considering the impact of parking space that would be used, traffic increases, and environmental impacts. We do not see the visioning work of our residents and committees in the three options proposed by your consultants. We see a blatant disregard for that citizen work and a bulldozing tactic to develop this space with little regard to the sustainable town design we've made clear that we want here.

We don't want less. We want more. We want to work together. We want to know that our elected officers and the consultants that WE hired aren't giving us lip service when they ask what we want but that they work toward creating a purpose-built community at every opportunity. Please bend over backwards for the people, not for the developer.

Sincerely,

Melissa and Joseph Robertson

February 01, 2019

LFP town center rezoning

Mr. Bennett,

I am writing to object the rezoning of LFP town center. Town center has been a community center of residents go to place for years. We need open space not high rise towers of apartment building and shopping mall. There are plenty of those in Seattle and that's why we choose to live in LFP.

The traffic in that corner of 104 and 522 has been congestion everyday during rush hours. It backs up for miles. We do not need more people and more cars in LFP. Have you tried to turn left from 178th Street to Ballenger way? I told my kids that's "Mission Impossible".

My children are in Shoreline school district. There are 28 children in one class. Yes, one teacher has to take care of 28 students and there are always transfer new student coming in every few months. Kindergarten has a certain number cap so lots of school has to do a lottery to get into boundary school. If unlucky, a 5 years old kid has to go to overflow kindergarten in Meridian Park. The bus ride from LFP to

Meridian Park school is 40 minutes one way. Imagine a little kid has to get up extra 40 minutes earlier just because his home school is over populated and he unfortunately didn't get the lucky draw!

Please do not proceed with rezoning the LFP Town Center.

Thanks Vivian Maturi

February 01, 2019

DEIS comments

As a resident and landowner in LFP our family strongly opposes the DEIS.

MORE time is needed for understanding and commentary.

Any zoning action should be Minimal guided by earlier 2015 expansion plans. Defined building plans must still pass a rigorous environmental review.

The hydrology of the area is complicated and disturbance could cause major problems in the 2 mile radius. Problems that cannot be easily reversed.

Extreme growth beyond requirement violates property rights of landowners. Violates protection of zoning.....while it provides windfall to mall owner.

Track the money!!! Propose a review to disclose inappropriate influence in alternatives.

The zoning is for the benefit of private equity investors. It does not address concerns of LFP residents and the impact to the Bothell Way transportation routes. The impact on neighborhoods by noise and extreme density.

How will this small community provide the needs for education, libraries, parks, medical care facilities. 1500 new residences will need water. Will need fire protection and safety. Will need open space.

Oppose passing DEIS.

Favor LFP to take legal action with special task force for investigation and tracking of negotiations made without openness to citizenry. Clearly the input of participating residents has been silenced.

RuthAnn Hodel

Lake Forest Park Resident since 1999

February 01, 2019

Town Center Plan

Mr. Bennett, Mayor Johnson, and Council Members,

I am writing as a citizen concerned about recent proposed changes regarding the Town Center Plan.

The founder of Lake Forest Park, Ole Hanson, put these words in the original prospectus, in 1912:

“the strict fiat has gone forth that all the natural beauty must be preserved; that no tree must unwittingly be cut down; that the natural wild flowers must remain; that the streams, the springs, the lake front, the nodding willows, the stately cedar, the majestic fir, the quivering cypress and the homelike maple and all the flora and fauna with which Nature has blessed this lakeshore, must not be defiled by the hand of man.”

The authorities, elected and non-elected, chose to violate that mandate about 60 years ago when they permitted the construction of a behemoth on Bothell Way.

The Town Center is at the heart of Lake Forest Park. I mean that both figuratively and literally. The very existence of the City of Lake Forest Park springs from the creation of this large commercial center in a then sleepy bedroom community.

The large scale of this project, and it's utterly incongruous placement, led the locals to rise up and incorporate. The driving force behind the creation of our city was to fight any attempt to have something like this ever happen again.

We are a small city that is unique in many ways. We are a non-commercial community. More than 95% of our city is zoned as low density residential. We like it that way. We moved here because of the character of the community. We don't want high density development.

I am not naive. I am not uninformed. I realize that we have to meet the housing requirements of the growth management act. We have already surpassed our 2035 goal! We have added hundreds of units in the South Gateway project. What drives you to add more? What makes you think some more is insufficient? Where on earth did you find the chutzpah to plan for up to 1500 units? This is not South Lake Union. There is no place for a tower crane in a place designed for towering firs, cedars, and spruces.

I stand with the late Mr. Hanson and all of those who fought the first desecration of our bedroom community. I stand with the heroes who opposed the original development. I stand forever opposed to the aggressive overreach of the planning department. I stand ready to commit to forceful resistance in the public square, and the courthouse, if necessary.

Stop this obscene project before it starts. Learn something about the community that you “serve”. Rethink the latest planning folly, and corporate land grab. My taxes should be spent to promote the needs of my fellow citizens, future residents, and not developers. When will the planning department learn that we want to save what remains of our town?

We deserve better.

Regards,

Gregg Ubelhart

February 01, 2019

Town Center Plan

Dear Mr Bennett Mr. Mayor and Council Members,

I am very concerned about the future density and over population of the Lake Forest Park Town Center. You may not know, but Lake Forest Park is a very special place. It's not like any neighborhood in Seattle, Bothell or our neighbors, Kenmore. We are special. Our city is green. We have beautiful Lake Washington, streams, creeks and forests floors... Many of us live on large parcels of land, allowing for open space and fresh air. Our town has resident eagles, various hawks, deer, owls, osprey and flying squirrels. We have a healthy ecosystem that you don't see in most cities. Just 6 miles north of the Seattle and BOOM You're in a dreamy forest on the shores of Lake Washington in this utopian city with a deep water aquifer. We are very lucky people to live here. I hope you understand.

I fell in love with Third Place Commons, in fact, the reason we moved here was because of the diversity and culture that it brought to this community. I would be devastated if it were gone. Third Place commons holds the HEART of Lake Forest Park.

One of the city's plan for 1500 units is too much. With the amount of people and cars to be added to LFP, our city will never be the same. Our streams will never be the same. Adding 3000 or more cars to this area will create traffic gridlock that we have never seen before.

I am urging you to please consider the smaller plan that treads gently on our environment yet allows growth, sunlight and beauty into to our city.

I look forward to seeing the council choose wisely for our collective future.
Thank you for your consideration,

Brandi Weill

February 01, 2019

LFP planning

Hello Mr. Bennett,

I appreciate the time and effort you and others have put into the EIS. I have a few comments regarding the Town Center redevelopment:

- I am happy about the potential redevelopment of the Town Center.
- In my opinion the Town Center has several limitations, most notably:
 - Poor pedestrian accessibility,
 - Too few bike storage areas,

- Limited patio areas,
- Lack of a main street feel due to the few stores and restaurants.
- Limited or poorly designed parking.
- In general, I like the balance Scenario 2, but am concerned that the amount of parking is not realistic given all of the potential users (building tenants, commuters, shoppers). No one wants a large parking structure for esthetic reasons and because that is land that could be used to generate revenue if in some other form (e.g., business), but having people parking in residential areas because of lack of available parking is not what anyone wants. I support changes to the code that support a large parking structure that accommodate all users.
- Please keep in mind that the proposed ST3 will be a large incentive for commuters to use the parking structure and thus sufficient parking (i.e. built population predicated several decades from now) should be provided to maintain the desire to use public transit for those that can. Assuming that any parking structure will have dedicated zones for commuters, residents, and shoppers, is there plan for an increase in the policing of those zones to ensure people are using them as designed (e.g., I would like us to avoid the scenarios in which residents with guests park in commuter spaces and/or commuters monopolize parking dedicated to shopping).
- Third Place Books is a hub for the community and I hope the future plans ensures that this remains the case. The library is another wonderful gathering space that I'd like to have a larger footprint in any future development (like the shoreline library on the corner of 5th ave NE and 175th).
- Although I am all in favor of some higher density residential housing in LFP, numerous high rise apartment buildings that remain partially empty is not desirable. Scenario three is too big and has too many units for my comfort.
- Like many in LFP I appreciate, and put a high value, on the green space and our well treed neighborhoods. In this sense I hope LFP town center mirrors its surrounding neighborhoods. More green space would benefit Lyon Creek and Lake Washington and the conservation and recovery of species such as salmon.

Thank you for this opportunity to provide comments. I am excited about this project and the improvements to LFP Town Center.

Paul Chittaro

February 01, 2019

Towne Center Plan DEIS

Dear Mr. Bennett,

I am writing to you to express my concerns about the plans I heard for development of the Towne Center. As a 27 year resident of LFP, one of the reasons I moved here is because of the quality of life in this town. I enjoy that it feels like a small town and is not overbuilt. It has a neighborhood feel and not overly congested, although getting a bit worse all the time.

I only recently heard about the proposal to develop the Towne Center to add at least 700 and up to 1500 housing units onto this relatively small area of land, which means at least 3,000 more residents all in that one area. I believe the impact of that would be very detrimental, and would significantly decrease the quality of life in our town, especially at the Towne Center. The proposals are in effect turning our Towne Center into a glorified apartment complex with a token area for the public. The open space feeling of the

area would be lost and replaced mostly with buildings with only a small area of open space. I think this would completely change the character of the center of our community for the worse. The other folks in my neighborhood have been almost universally opposed to this plan. And many of them, like myself, have not even heard of the development plans until just now. I am certain that if you took a poll of the folks who live in LFP you would find the vast majority would be very strongly opposed to this plan. As I recall, the community was asked for their input as to the vision for the Towne Center early last year. It appears that the comments made by the community were completely ignored in this proposal. Why? That should be the guiding principles, not tossed aside as it appears to have been.

I understand that the City of LFP needs to add 551 housing units by 2035, and that some of those have already been built at the 145th and Lake City Way area. That would leave probably less than 200 left to build.

Even if they need to add an additional 551 units, the requirement is that they need to be added anywhere in LFP. The land area of the Towne Center is about 1 % of the area of LFP, and I see no reason why all of the new units need to be added to this one tiny area. I also don't see comments about the affect of adding that many units into so small an area on the already bad traffic congestion, in addition to adding a Sound Transit Parking garage to this area, which already adds traffic. How will all this traffic be handled? Wouldn't it make far more sense to spread that housing out though out several areas of LFP to minimize the congestion at the Towne Center?

I am not opposed to adding some housing units there, perhaps no more than 200 units. But it needs to incorporate the original vision of those of us who live here. We want the Towne Center to be an attractive, appealing place that the community is proud of, and that will continue draw new residents to our city.

Sincerely,

Jeffrey Gelgisser

February 01, 2019

Comments on Lake Forest Park Town Center Proposals

Dear Lake Forest Park Public Officials,

I would like to share my concerns regarding the three plans that were proposed for the Lake Forest Park Town Center at the meeting on Jan 16, 2019. I had heard that the council was exploring options for improving the Town Center that included some possible mixed use. Given the character of our city, I expected this to be no more than 100 housing units that might be up to three stories in height. I was completely shocked when I saw the three plans. Even the minimum plan #1 for adding up to 700 housing units is much too dense for this small area. What is driving this need to cram affordable housing into a space that is only 1% of the City of Lake Forest Park? At this meeting several people who worked on the Vision Task Committee expressed shock and dismay that their recommendations were not part of the proposals. I hope that this does not mean that the Lake Forest park Council has already made their decisions and these efforts to involve the community and ask for public opinion are just a "feel good" tactic.

The plans presented by the consultants seemed poorly considered. The amount of parking space proposed would be woefully lacking for residents and shoppers. The assertion that any of these plans would not impact traffic in this area is hard to believe. I visit the Lake Forest Town Center often to spend time at Third Place Books, to have coffee, work out in the gym, or just see people. The idea of filling this space with tall buildings and so many people would be a nightmare. How could you think that our community would want to cram almost 30% more housing units into one small part of this city? Why do we feel the need to add significantly more housing that was mandated by the King County Growth Management Act? The Vision Task Force members indicated that an increase of approximately 400 units at the town Center was considered. Why was that number not one of the proposed options for consideration?

I have been a resident in Sheridan Heights for 30 years. This was a wonderful community to raise our three children. When we first moved in, our area was part of unincorporated King County. My husband and I became involved when they initially tried to make our area part of the City of Shoreline. We spent countless hours canvassing the neighborhood with petitions and making phone calls. We were able to help stall this process so that our community had the opportunity to vote for the city our area would join. I was strongly in favor of being a part of the City of Lake Forest Park because it seemed to be much more in line with our community. We have always found Lake Forest Park to be charming with its extensive canopy of trees, the small size, low growth, and the lack of sprawling developments. I now feel deeply worried and betrayed for my trust in this city.

I have talked to many of my neighbors. Every one of them is completely opposed to the three plans presented. A more accurate way to express sentiments would be to say that they are appalled and think this would ruin the city. You need to slow down this process, and come up with a much better plan. I would like to be able to trust our elected officials to protect the charm of our lovely city and the wishes of the community instead of promoting the interests of the developers. I would agree that the Lake Forest Park Town Center is underutilized and could use improvements. If it is necessary, only bring in a small number of housing units (100 to 200 at most). Do not bring in buildings over three stories in height. Keep the mall, the Third Place Books (where it is and not on top of the parking structure), the library, the restaurants and our farmers market.

PLEASE DO NOT RUIN OUR COMMUNITY BY DESTROYING OUR TOWN CENTER AND CREATING A MASS PLANNED HOUSING STRUCTURE IN THE HEART OF OUR CITY.

Thank you,

Lee Jardine

February 01, 2019

Town center

The process for approval of development at town center is accelerating way too fast to consider the impacts (positive or grossly negative) to the long standing residents of LFP.

There are many concerns with the weight of proposals at this time and no answers available. The current proposals support outside investors and do not take into account the LFP community and its needs. The same community that just made top 15 safest cities..... can we keep that with this plan?

Will the development:

- *offer civic recreation opportunities that don't have to be shared with other local parks and recreation?
- *maintain common meeting space like third place commons offers for socialization, work, families?
- *support significant increased demand in public resources including fire, police, sewer, water, traffic?
- *meet current and future demands for parking to access rapid transit plans?
- * protect from negative environmental impacts of huge building and solid structures in wetlands and active salmon creek bed areas?

Please work with your long-standing residents and landowners who live, work and love lake forest park, to maintain this safe and wonderful community. Do not allow money to corrupt with greed and force a plan not fit for the area.

Susan Collins
Resident of LFP since, 1999
And homeowner

February 01, 2019

February 01, 2019

Town Center DEIS

Dear Mr. Bennett,

Please find attached my comments regarding the Town Center DEIS. Please make it part of the public record.

Best wishes,

Jeff

Dr. Jeffrey S. Jensen

<SEE ATTACHED LETTER>

February 01, 2019

Town center zoning changes

Good evening,

I wanted to express my concerns with the proposals for development of the Lake Forest Park town center. My family has lived here for just a year-and-a-half now and couldn't be happier with the neighborhood and community we've found. We've gotten to know neighbors and friends faster than any place we've lived thus far and enjoy being within walking distance of Brookside Elementary, Pepitas Preschool, and the town center.

That being said, these new plans are really going to affect our family. My biggest concern is for the safety of my children. I have two boys who attend Brookside Elementary and have recently started walking to school together by themselves. They have gained great responsibility and confidence in being able to do that. I also have a son who attends Pepitas Preschool and we get to walk together to his class. So much new housing will bring in a lot of new traffic and I worry that it would no longer be safe for my older boys to walk by themselves, or even for my younger son and I to walk to preschool. Brookside Boulevard doesn't get very busy right now, but there is already trouble with drivers speeding on that road. 178th can be somewhat busy already, and with the way the crossing guards are instructed to cross kids, my boys have to cross it twice to and from school. I can only imagine the potential for accidents.

The playground at Eagle Scout Park is geared toward preschool aged kids and younger and would be right in the middle of that traffic as well. That would make it an unappealing place to go play. How unfortunate to have a neighborhood playground that I can walk to in five minutes, yet feel that it's not safe enough for my kids.

Another consideration for my family is my husband's commute to work. He drives down to Bellevue and it's a fairly reasonable drive. We place a high value on our time together as a family, which is why location was on the top of our list when looking for a place to live. Sure, we could have had a bigger house in move-in ready condition if we had chosen to live farther north, but the time saved on the drive is worth more to us. That extra traffic will steal my time with my husband and my kids' time with their dad.

I implore you to please hold off on this new zoning until plans that would better suit the lives and character of this community can be agreed on.

Sincerely,
Heather Brewer

February 01, 2019
Town center scenarios

Dear Mr. Bennett. I am writing to say I prefer the scenario 1 at this point. I feel the other options will cause too much congestion at the town center. I prefer to have housing spread out all over the city rather than being concentrated along arterials. Re-visiting ADU requirements would help. I think the process was confusing for many people, and the City needs to back up and explain what is involved with the DEIS, and what the impacts are of our decisions. I am still unclear if what we decide here now could lead to the City Council voting to change the

allowable building heights in the near future, or if there would first be a chance for public comment. But my main concern is congestion and also that we have a site with a mix of businesses, open space, housing, restaurants, etc., and that it not become primarily housing. Hopefully we can reset the process, and have more time for input from the planning commission and the public.

Regards,

Carol Worthen

February 01, 2019

DEIS support Alternative 1

Greetings,

Regarding the rezoning of the town center area, please give priority to Alternative 1.

As well, please give priority to as few dwellings as possible.

I ask this in the spirit of keeping traffic flows to a minimum throughout the town center area and surround.

I am convinced this is the most responsible way to move forward with (re)zoning the town center.

Thank you for respecting my feedback.

Sincerely,

Suzanne Withers

February 01, 2019

Town Center redevelopment project

Dear Mayor and City Council Members:

Thanks for allowing me to comment on the proposed redevelopment project at Town Center.

I'm writing to urge you to slow down in your rush toward a high rise retail/residence structures. Take time at the very least, for a careful study of the site by geotechnical engineers, to determine the suitability of the soils on which Town Center is built, and the likelihood of the ground giving way in an earthquake.

Search and you can find Lake Forest Park citizens who recall when the site of the current Town Center was a forested swamp. In the intervening decades it's been filled with excavated earth from the hundreds of cellar holes and building lots lots graded throughout the community.

The authors of your DEIS seem to view any earthquake hazard at the site as a minor impediment. One that the project's developers will somehow overcome, although the document does not say how.

I've scoured your DEIS on the redevelopment project and failed to find any reference to the earthquake hazard that invariably travels with high rise development on fill dirt. Especially on a

shoreline. Where a shallow water table creates ideal conditions for soil liquefaction. In a region threatened by the Cascadia subduction zone.

A 2017 study at the University of Washington simulated the dimensions of the disaster that will occur when the Juan de Fuca Oceanic Plate slips farther beneath the North American Plate. The study assumes an earthquake of magnitude 9. Hundreds of times greater than the magnitude 6.8 Nisqually quake our region experienced in 2001.

“It could happen any day,” according to Erin Wirth, the lead researcher on the UW study.

Try to envision the scene. Clusters of seven-story towers, housing a mix of residential and retail, brought down by an earthquake during a rush hour gridlock that has itself been magnified by deliberate decisions to densify the a city that lacks the money to enlarge and maintain the desired escape routes.

No one can calculate the loss.

We can't do much about it, other than wait for it to happen and pray that we and our loved ones are in a strong low-rise structure when it hits.

Actually, there is something you can do about it. You can take your time.

What, after all, is driving this urgency for quick approval of the most controversial changes ever proposed in your city? The much heralded transit station and parking garage now look to be years further from reality than they first appeared. Sound Transit has let it be known that it won't seek permits for their project for another four or five years.

Meanwhile there is no specific redevelopment proposal from Town Center's primary landowner; the DEIS says the site will be redeveloped in phases over the next 15 to twenty years.

Were you truly in too great a time bind even to allow the City Planning Commission to critique the DEIS and recommend changes? Seems to me you owe your citizenry a detailed explanation of that procedural lapse.

Surely there's time for the experts to examine the earthquake risk, and yourselves to consider the hubris involved in approving a project of this nature and scale on land that may turn to jelly in minutes.

Sincerely,

Bob and Dee Simmons

February 01, 2019

DEIS commentary.

As a LFP resident and registered voters, our family strongly believes the council representations should be to its citizens.

We favor the least extensive code changes and no building construction without rigorous environmental impact. The hydrology of the mall land could create extreme water and earth shifting issues and obliterate environmental protections.

Why is the council providing a windfall to private equity investors. Their high ROI is not our concern.

The council has let residents put in hours of planning work, only to propose approval of extreme code changes. Changes allowing for building heights not even disc Designs not of landowner but what developers may want to propose.

Proposing to change to building heights and land coverage never anticipated by residents.

Delay your vote.

RA Hodel

February 01, 2019

Town Center Zoning changes- opinion

Hi,

My husband and I are both opposed to changing the Town center. It will change the whole feel and charm of LFP.

Where in the world would all those people park if there were 1500 units added? No one would want to go to the town center because the parking would be taken up by all the people living there. Also, there would be lots of people who would park their cars in Sheridan Beach. There are lots of kids who bike and scooter around the neighborhood. This is not safe for them. Also, it could hurt the value of our houses.

I realize that the garage for commuters is a foregone conclusion. Showing the mock up pictures of what the Town center could look like might be appealing to some. However, has everyone really thought through the impact of adding so many housing units and the height of the building. Our great community center would look like every other neighborhood that is changing in Seattle. Do we want to be another Ballard? The answer is no thank you.

We sincerely hope that the residents in this great unique community will actually be heard and our comments be seriously taken into consideration. Not everything should be about the almighty buck. Large companies like the owners of the Town center often just think about profits, not how the changes impact people.

Sincerely,
Alex and John Davis

February 01, 2019

Town Center Development
Dear Councilwoman Kassover,

Our family has lived within a 10-minute walk of the Town Center for 25 years.

We are writing to express strong opposition to residential development at the Town Center. Why anyone representing Lake [Forest Park](#) citizens would want to change the character of our city, and reduce the quality of life for nearby residents, is beyond us.

(Already, traffic on our street is horrible - proposed changes would certainly exacerbate that problem.)

Please oppose the construction of housing units at the Town Center. We also ask that you proceed at an appropriate pace, and make decisions with transparency.

Thank you.

Donald and Wendy Caldwell

February 01, 2019

DEIS comments

Mr. Bennett,
Please find attached comments to the proposal for rezoning the town center.
Sincerely,
David Hammond

<SEE ATTACHED LETTER>

EARLIER EMAILS FROM PETER EGLICK

From: Peter Eglick
Sent: Monday, January 7, 2019 1:49 PM
To: 'SBennett@ci.lake-forest-park.wa.us'; 'sbennett@ci.lake-forest-park.wa.us'
Subject: RE: Town Center DEIS

Greetings Steve

As a resident of LFP nearby to Town Center where I often can be found, a quick look at the Town Center DEIS raised a couple of questions: 1. Is there no specific mention in the DEIS of what numerical **Type** (as that term of art is used in the LFPMC) of decision the City will be making based on the Town Center EIS? 2. There also seems to be no mention of the path for appeal of the adequacy EIS once the decision **TYPE** is established.

Can you please enlighten on these points ?

Thank you,



Peter J. Eglick
Eglick & Whited PLLC
EWLAW.NET
Phone: 206-441-1069

Address: Suite 3130, 1000 Second Avenue, Seattle, WA 98104

From: Peter Eglick [<mailto:eglick@ewlaw.net>]
Sent: Thursday, January 10, 2019 11:08 AM
To: Stephen Bennett <SBennett@ci.lake-forest-park.wa.us>
Subject: RE: Town Center DEIS

Thank you Steve.

I did not see them with the DEIS material. If I did not overlook them, why weren't they included with the DEIS (and why not on the DEIS web page) when the DEIS was issued?

Also, how is this all going to work. When will the FEIS be issued, including review and responses to all public comments, and when will the Planning Commission actually have the EIS in hand ?

Also, where can the public obtain the technical appendices to the DEIS?



Peter J. Eglick

Eglick & Whited PLLC

EWLAW.NET

Phone: 206-441-1069

Address: Suite 3130, 1000 Second Avenue, Seattle, WA 98104

This e-mail is for the sole use of the intended recipient(s). It contains information that is confidential and/or legally privileged. If you believe that it has been sent to you in error, please notify the sender by reply e-mail and delete the message. Any disclosure, copying, distribution or use of this information by someone other than the intended recipient is prohibited.

From: Stephen Bennett [<mailto:SBennett@ci.lake-forest-park.wa.us>]
Sent: Thursday, January 10, 2019 10:57 AM
To: Peter Eglick
Subject: RE: Town Center DEIS

Peter,

The latest drafts of the code update and the design guidelines are on the Planning Commission page of the City website. Here are links to the commission agenda packets that contain those drafts. We'll have updated drafts by the time of the DEIS hearing on the 16th.

Draft code updates:

<https://www.cityofflp.com/Archive.aspx?ADID=1733>

Draft design guidelines:

<https://www.cityofflp.com/Archive.aspx?ADID=1747>

Steve Bennett

Planning Director

City of Lake Forest Park

17425 Ballinger Way NE
Lake Forest Park, WA 98155
206-957-2812
www.cityofflp.com



Disclaimer: This email is considered a public record and may be subject to public disclosure.

From: Peter Eglick [<mailto:eglick@ewlaw.net>]
Sent: Wednesday, January 09, 2019 4:37 PM
To: Stephen Bennett <SBennett@ci.lake-forest-park.wa.us>
Subject: RE: Town Center DEIS

Thank you Steve for your response.

I can't find online the actual legislation that is apparently being proposed and that is apparently somehow the subject of the DEIS. Can you point me in the right direction where I and my fellow LFP residents can find the proposed legislation as we read the DEIS.

Thank you,

Peter



Peter J. Eglick

Eglick & Whited PLLC

EWLAW.NET

Phone: 206-441-1069

Address: Suite 3130, 1000 Second Avenue, Seattle, WA 98104

This e-mail is for the sole use of the intended recipient(s). It contains information that is confidential and/or legally privileged. If you believe that it has been sent to you in error, please notify the sender by reply e-mail and delete the message. Any disclosure, copying, distribution or use of this information by someone other than the intended recipient is prohibited.

From: Stephen Bennett [<mailto:SBennett@ci.lake-forest-park.wa.us>]
Sent: Wednesday, January 09, 2019 2:04 PM
To: Peter Eglick
Subject: RE: Town Center DEIS

Peter,

A decision on the sufficiency of an EIS related to any nonproject action is a Type IV decision according to LFPMC 16.26.030(D)(5) (code excerpt included below).

There is no administrative appeal provided for in the LFPMC, but it is the City's opinion that an appeal would be filed with Growth Management Hearings Board.

16.26.030 Classification of decisions.

...

D. Type IV – Legislative Nonproject Decisions Made by the City Council.

1. Amendments to the text of the land use code or comprehensive plan;
2. Amendments to the comprehensive plan map;
3. Site-specific or project-specific proposals affecting the comprehensive plan;
4. Amendments to the zoning map (rezones) on a city-wide or area-wide basis, or multiple site nonproject rezones; and
5. A decision on the sufficiency of an EIS related to any nonproject action.

Hope this response addresses your questions. Let me know if it hasn't.

Steve

Steve Bennett
Planning Director
City of Lake Forest Park

**ATTACHED: LETTERS AND COMMENT FORMS RECEIVED
ON THE LAKE FOREST PARK TOWN CENTER PLAN
DRAFT ENVIRONMENTAL IMPACT STATEMENT
*(Not in chronological order)***

January 30, 2019

VIA EMAIL AND U.S. MAIL

Mr. Steve Bennett, Planning and Building Director
City of Lake Forest Park
17425 Ballinger Way NE
Lake Forest Park, WA 98155

Dear Mr. Bennett:

This firm represents Merlone Geier Partners (“Merlone Geier”), which owns and operates the Lake Forest Park Town Center, in Lake Forest Park, WA. Merlone Geier respectfully submits the following comments in response to the City of Lake Forest Park’s (“City’s”) issuance of the *Lake Forest Park Town Center Draft Environmental Impact Statement* (“DEIS”).¹

Merlone Geier appreciates the City’s comprehensive effort to study the potential environmental impacts of a new Town Center Subarea Plan and related regulations and guidelines.

I. Overview of Comments

There are a number of important Washington State Environmental Policy Act (“SEPA”) principles that apply to the analysis and consideration of a subarea land use plan. The State SEPA Rules (Chapter 197-11 WAC) provide that non-project EISs, like this one, should be limited to a general discussion of the impacts of alternative proposals for potential land use designations and development patterns. The City is *not* required to examine all conceivable policies, use designations, or implementation measures associated with potential redevelopment under the proposed subarea plan. *See* WAC 197-11-442; *Cascade Bicycle Club v. Puget Sound Regional Council*, 175 Wn. App. 494 (2013).

It is also the case that an Environmental Impact Statement (“EIS”) need not mitigate for each and every potential environmental impact. The purpose of an EIS is to identify, disclose and analyze only the *probable significant adverse environmental impacts* of a proposal. The term “significant,” as defined in SEPA, means “a reasonable likelihood of more than a moderate adverse environmental impact.” WAC 197-11-794(1). For example, not every shadow cast by a Town Center building nor private view of potential Town Center development constitutes a significant adverse environmental impact warranting mitigation under SEPA.

¹ Merlone Geier incorporates, by reference, its prior written comments submitted to the City during this planning effort. These include comments submitted in reference to the City’s Visioning process, proposed design guidelines and standards, proposed amendments to the LFPMC, Town Center Plan and EIS Scoping Notice.

Despite some suggestion in the DEIS, Merlone Geier does not have definitive plans to redevelop the Town Center. We are participating in this public process with an eye towards how our investment would be impacted. A decision to move forward with any redevelopment project depends upon market conditions, the local regulatory environment, and the risk tolerance of owners and investors. If any one of these factors are askew, there may be no change to existing developed conditions at the Town Center for many years to come.

Merlone Geier supports many of the urban planning and urban design elements contained in the City's 2018 Vision, but there is a long list of amenities desired by various stakeholders. It should be observed that the Town Center is a site constrained by its existing condition, particularly when one takes into account existing lease obligations with their associated loading and parking requirements, building setbacks, the presence of Lyon Creek along the western border, separate owners on all three corners of the property, traffic circulation, and of course, two major adjacent highways. The City's Subarea Plan, Design Standards and Municipal Code must recognize these constraints in order for the site to remain economically viable.

It is unlikely in any given redevelopment scenario that Merlone Geier can or should be asked to deliver the full range of amenities desired in the City's Vision. And in the case of the SEPA, the City cannot require specific Vision elements as mitigating conditions unless there is a specific significant adverse environmental impact identified and the requested mitigation is reasonable. To that end, we welcome a discussion about possible zoning incentives designed to help achieve the City's Vision. There is some discussion of this topic in the DEIS, but given the lack of specificity, there is no accompanying disclosure or analysis of potential environmental impacts. It follows that if any incentives are, in fact, developed, they may need to be more specifically analyzed in the Final Environmental Impact Statement ("FEIS").

II. EIS Requirements for Non-project Actions

The City has issued the DEIS as a means of soliciting input on its analysis of a range of proposed alternatives and probable significant environmental impacts associated with adoption of Town Center Plan, amendments to the Lake Forest Park Municipal Code ("LFPMC" or "Code") and new design standards and guidelines to support implementing the plan. As the City is aware, SEPA limits the scope of environmental review to impacts that are both "probable" and "significant." *See* RCW 43.21C.031. This is important to recognize as the City reviews and responds to public comments in the FEIS.

The City has greater flexibility in preparing EISs on non-project proposals such as this because there is less detailed information available on environmental impacts and specific project proposals. *See* WAC 197-11-442(1). Notwithstanding, SEPA provides that any future development application located within the subarea may incorporate, by reference, or adopt this non-project EIS in fulfillment of future environmental review.

III. Specific Comments on the DEIS

Chapter 2.0: Description of Alternatives

A. Alternative 1: “No Action Alternative”

- The City has elected to define the “No Action Alternative” to assume a certain level of development activity that lies between no change to existing development conditions and a level of development that maximizes existing zoning. It is Merlone Geier’s view that the No Action Alternative includes the potential for 225,000 sf of retail and office uses on the Town Center property (this does not include Windermere, Starbucks, City Hall, Gas Station and Fire Station). This number (225,000 sq. ft.) is greater than the City’s assumed square footage under Alternative 1. Therefore, the City should clearly specify that the analysis of any probable significant environmental impacts of maintaining existing zoning, i.e., sometimes referred to in SEPA as “the worst case,” is captured both under the analysis provided for Alternatives 1 and Alternative 3 (which assumes at least 225,000 sq. ft. of retail and office use).
- Contrary to the City’s statement in Chapter 2.0, page 3, Merlone Geier s does not believe the No Action Alternative precludes voluntary compliance with elements of the City’s Vision (2018). The City may wish to revisit this assumption in the FEIS.
- While the existing LFPMP may not refer to transit-oriented development specifically, development at the Town Center under the existing LFPMP may include residential densities that complement the anticipated presence of Sound Transit ST3 elements, including a station pair in SR 522/NE Bothell Way at the Town Center and a park-and-ride parking structure.

B. Alternative 2: “Varied Height and Form”

- The Description of Alternative 2 distinguishes itself from Alternative 3 by stating that “new buildings of varied heights and form are assumed with a mix of land uses,” in contrast to Alternative 3, where it is assumed that “new buildings would be more uniform in height and form...” It should be stated that while the impacts of height, bulk and scale may be assumed to be greater under Alternative 3 in one or more areas of the site, Alternative 3 may also be characterized by buildings of varied height and form. A monolithic development pattern is not inevitable under Alternative 3, as the DEIS appears to suggest.
- The Description of Alternative 2 states that “updated LFPMP provisions would address housing affordability consistent with adopted plans and policies.” This Non-project EIS should not be the focal point for analyzing or evaluating options for increasing housing affordability in the City, nor should such policy decisions be limited in their implementation to the Town Center. There is no suggestion in the DEIS that policy choices regarding housing affordability would result in probable significant adverse environmental impacts. This should be clearly stated in the FEIS.

C. Alternative 3: “Uniform Height and Form”

- As noted above, the general description of this alternative should note that, despite its title, building form may include varied heights even though permitted building height would be greater.

- It is not clear how the additional 200 parking spaces for Commercial, City /Public Use would be constructed on the site, i.e., whether that additional parking capacity would be realized through an increase overall height of the garage or be accommodated below grade.
- Table 2.1 – Please revise footnote 2 of the table to reflect that “[m]edical/dental office uses may be displaced by the siting of a new building and parking structure.” It is not certain that this will occur, and, if so, whether the affected businesses will, in fact, re-locate on-site.
- Table 2.3 – Maximum Floor-to-Floor Heights: While the DEIS contemplates a maximum ground floor height of twenty (20) feet, the City has not provided a supporting rationale for this standard.
- Table 2.3 – Floor Heights: The table includes the following statement: “The EIS analyzes the potential for second levels of podium buildings to be designed to look like the levels above rather than the ground level and to be setback from first levels per EIS analysis- see Chapter 4.” The EIS should not assume upper level building setbacks and should analyze, instead, a worst case scenario where there are no upper level setbacks. Despite the reference to Chapter 4, it is not apparent where this condition is discussed or analyzed in that chapter.

Chapter 3.0: Affected Environment

- It is not clear whether Chapter 3.0, entitled, “Affected Environment,” is also meant to include a discussion of mitigation measures as the header on page 23 suggests (“Analysis and Mitigation”). It appears that analysis and mitigation is addressed solely in Chapter 4.
- **Section 3.1** - The specific reference to tenants that may have “long-term lease agreements” should be deleted in the FEIS.
- **Section 3.1** - The discussion of the Lyon Creek Flood Mitigation Project on page 9 should include a reference to joint cooperation with Merlone Geier to accomplish the referenced improvements.
- **Section 3.1** – Figure 3.1.3 should specify the different property owners of the parcels displayed on the map.
- **Section 3.1** - Table 3.1.4 - The reference to Merlone Geier Partners as the “Source” of population, household and income data should be removed and replaced with “ESRI, 2018.”
- **Section 3.1** – Open Space- The DEIS should acknowledge that the desirability of creating a significant amount of public open space on the Town Center property must be balanced against the fact that this site is the only significant commercial core in the City. Merlone Geier believes an appropriate standard for public open space, and one that is seen elsewhere in the market, should be equivalent to 1% of the sum of total building area and total site area, rather than being based on ratio of sq. ft./dwelling unit.
- **Section 3.1, Page 20** – The statement “MGP has been making improvements to the shopping center and has plans to redevelop the site in phases over the 15-20 years” should be re-worded to reflect Merlone Geier’s actual position. Suggested language: “The EIS is a planning level analysis of what might occur at the Town Center using a 20-year planning horizon. Merlone Geier has no definitive plan to redevelop the shopping center at this time.”

- **Section 3.5 – Pages 74-75:** Level of Service Standards and Significant Impact Thresholds - Please provide more information regarding the LOS standards (e.g. adopted City standards or WSDOT standards) used to evaluate existing conditions as well as the project impacts. In particular, provide more information about how LOS standards are applied to side-street approaches on WSDOT-controlled highways (SR 104 and SR 522), how those standards may vary depending on traffic control (signal versus unsignalized approaches); and what may occur if intersections are operating below those standards.
- **Section 3.5 – Page 76:** The DEIS states, incorrectly, that no shared parking agreements exist on the Town Center site. There is a shared parking agreement between Merlone Geier and the City, Merlone Geier and the Starbucks parcel, and Merlone Geier and the Windermere parcel. There are also shared parking provisions in existing leases. Consequently, we suggest deleting the sentence that reads, “While there are no formal shared parking agreements at Town Center, there is a general informal pattern of sharing parking across the site to accommodate periods of heavy use (such as for Farmers Market and special events).”

Chapter 4.0: Analysis and Mitigation

- **Section 4.1** - The discussion of building heights is confusing as it utilizes different terms to discuss the same height condition. For example, a 75’ building height is described in Section 4.1 in reference to the “base roofline,” while the same height dimension is referred to as “Top Floor Height” in Figure 4.1.1. Also, the construction type noted in this figure should be Type V, not Type IIIA.
- **Section 4.1** - Several of the images of representative projects offered in Section 4.1 to depict a maximum height limit of 75’ to the base roofline do not appear to accurately depict that condition and should be removed in the FEIS.
- **Section 4 - - Table 4.1.2** – Employees at Town Center: The DEIS states that there are 585 employees in the Town Center Planning Area. A recent survey by Merlone Geier indicated 200-220 employees (not including the City, Starbucks or Windermere). The FEIS should reflect the accurate employee count. Any analysis for traffic, mitigation or parking should break-out the employee assumptions for the various uses within the Planning Area.
- **Section 4.1 - Page 5:** There is a reference to both 400 and 500 parking spaces in the parking structure. It is not apparent how this amount of parking works for retail, residential and civic uses in the structure. Specific parking ratios that the City is solving for should be provided in the FEIS.
- **Section 4.1** - Although the DEIS states (at page 7) that with “implementation of Alternatives 2 or 3 there would be the potential to require and incentivize public and private open space, Lyon Creek setbacks and enhanced plantings, and a variety of public gathering spaces....,” not enough detail is available to provide meaningful commentary on the relative feasibility or desirability of such requirements or incentives from an owner’s or developer’s standpoint. Nor is there sufficient information available to assess any probable significant adverse impacts that may occur as a result of implementation of any such incentives or that would trigger these projects as mitigation. This should be clarified in the FEIS.

- **Section 4.1** of the DEIS discusses housing affordability at length. This Non-project EIS should not be the focal point for analyzing or evaluating options for increasing housing affordability or adopting a multi-family tax exemption program in the City, nor should such policy decisions only be limited to a small sub-area of the City. There is no suggestion in the DEIS that policy choices regarding housing affordability would affect or result in probable significant adverse environmental impacts. This should be clarified in any subsequent discussion of this topic in the FEIS. It follows that the lack of a finding of a significant adverse environmental impact does not support imposition of mitigation measures for affordable housing, as presently stated in Section 4.1 of the DEIS at p. 20. (See discussion of mitigation in next bullet).
- SEPA dictates that mitigation measures must be reasonable and capable of being accomplished. Applicants may be required to implement mitigation measures only to the extent attributable to the identified adverse impacts of a proposal. See WAC 197-11-660. However, the EIS is not required to include a specific remedy for every environmental impact and the City should refrain from attempting to do so. See *Residents Opposed to Kittitas Turbines v. State Energy Facility Site Evaluation Council*, 165 Wn.2d 275 (2008).
- **Section 4.1.-** MFTE (Chapter 84.14.020 RCW) While the DEIS correctly states that the multi-family tax exemption is available under state law for 12 years where 20% of units in multi-family buildings are affordable to low and moderate-income households, the discussion fails to address the fact that the statute also provides that the MFTE tax exemption is also available for eight successive years in circumstances where the 20% requirement is not met. This should be clarified in the FEIS.
- **Section 4.1** – Although not clearly stated, the analysis of potential shading impacts along the west side of the property, including the Sun/Shade Study in Figures 4.1.6a Alternative 1, Figure 4.1.6b Alternative 2 and 4.1.6c Alternative 3, leads to the conclusion that no significant adverse environmental impacts will occur in light of existing conditions, i.e., existing mature trees that already partially block direct sunlight during select times of the year. The FEIS should clearly state these findings. Further, it is not clear in the DEIS what the assumed setback was for the Sun/Shade Study. There is no basis for considering both increased setbacks and upper level setbacks to address the modeled conditions.
- The FEIS should include an adequate discussion of potential greenhouse gas emissions and impacts on climate change.
- The FEIS should include an adequate discussion of cumulative environmental impacts, as required under WAC 197-11-060(4)(d)-(e); See also, RCW 36.70A.130(2)(a)(i)(cumulative impact discussion applicable to Subarea Plans).
- **Section 4.5 – Page 78: Assumed background transportation improvements** – Please provide additional information about the two transportation improvement projects listed on page 78 (signal at SR 104 / NE 178th St and additional southbound left-turn at SR 522 / NE 170th St). Since they are described as “background mitigation measures,” please include information about the projects and impacts for which they are considered mitigation and an approximate timeline for implementation. Also include details about funding for these projects, as available.

- **Section 4.5 – Page 79: Town Center Area Plan Trip Generation** – Please acknowledge that the trip generation estimates and methods applied in the EIS using the referenced “*Main Street Trip Generation Tool*” likely result in conservatively high estimates of external vehicular traffic. Also note that project-level analyses will most likely be prepared using the most current methods and accepted procedures outlined by the Institute of Transportation Engineers (ITE) in its *Trip Generation Manual* and its companion *Trip Generation Handbook*, (current versions published in September 2017 provide guidance for estimating trips within mixed-use developments), and that this standard method will likely result in lower external vehicular trip estimates compared to those in the EIS.
- **Section 4.5 – Page 80 & Table 4.5.2: Park-and-ride trip generation** – Provide additional detail and/or clarifications related to the trip estimates associated with the planned Sound Transit park-and-ride component (commuter parking structure) of the Town Center Plan. Some inbound trips associated with transit passenger pick-up and reverse-commute trips would be expected. It is not clear how or why the “*analysis assumes this use under the Town center land use trips.*” Rates from ITE’s *Trip Generation Manual* for Park-and-ride Lot with Bus or Light Rail Service (LU 090) may be appropriate for comparison.
- **Section 4.5 – Page 80: Trip Generation Allocations** – To enhance future utility of the EIS and to facilitate comparisons for subsequent project-level analyses, it would be beneficial to provide information about trip generation contributions from the major Town Center constituencies including the City Hall/municipal element, Starbucks drive-thru element, Sound Transit park-and-ride element, and private commercial/residential element.
- **Section 4.5 – Page 81: LOS Standards** – See comment above and note this section also lists standards for “Auto and Freight” as well as “Transit.” Please provide more information regarding the LOS standards (e.g. adopted City standards or WSDOT standards) used to evaluate project impacts.
- **Section 4.5 – Page 85 and Table 4.5.3: Options for improving SR 104 / 175th Intersection Operations** – Although the overall intersection LOS is forecast at LOS C, the document notes queuing and delay issues and refers to slight improvements due to signal optimization. The LOS calculations indicate the east and west approaches would operate at LOS F with high delays for all three alternatives. Since the detailed LOS analyses show LOS F conditions with high levels of delay for the Town Center egress approach, please provide additional information about how operations for this intersection, particularly egress from the site can be improved. Egress from the site is important to the City Hall/municipal component, future park-and-ride element, and the private commercial and future residential component.
- **Section 4.5 – Page 85-86 and Table 4.5.3: SR 104 / NE 178th St Intersection** – Consider clarifications to Table 4.5.3 and/or its footnotes related to the assumed traffic control since it changes between the existing (unsignalized) and Alternative 1 (signalized) conditions.
- **Section 4.5 – Page 85-86 and Table 4.5.3: SR 522 / NE 170th St Operations** – Please provide more explanation for the reasons causing degradation of this intersection between the existing

(LOS A) and Alternative 1 (LOS D) conditions. Since the LOS calculations indicate increases of only 20 more trips northbound and only 15 more trips southbound on the NE 170th Street approach, much of the degradation may be due to growth in background traffic not generated by the Town Center. If so, please acknowledge that and that it may influence how mitigation responsibility and funding are determined.

- **Section 4.5 – Page 88: Thresholds of Significance** – Please provide more information and/or sources for the thresholds and standards identified to determine whether impacts are considered significant for both the auto/freight and transit categories.
- **Section 4.5 – Page 93 and Table 4.5.4: SR 522 / NE 170th Street Intersection Operations** – See comment above and provide information about contributing causes for increases in delay. Since increases in delay projected with Alternative 1 appear to be larger than for either Alternative 2 or 3, it is not clear what proportion of responsibility should be allocated to the Town Center (versus general increases in background through traffic on SR 522).
- **Section 4.5 – Page 95: Mitigation Measures** – See comment above. Clarify whether planned improvements at the SR 104 / NE 178th Street and SR 522 / NE 170th Street intersections are mitigation or are assumed background transportation improvements.
- **Section 4.5 – Page 97: Mitigation Measures** – Some of the items listed may be reasonable elements to include and or incorporate into the plan, but may not be mitigation for any specific significant adverse impacts. Consider modifying the description to separate incorporated plan elements from mitigation requirements.

Please provide more information about the proposed shared-use path loop around the perimeter of the Town Center. Indicate how or why it is listed as a mitigation measure and for what potential significant impact it is mitigating, if any. Please indicate how this path would be implemented and how it would relate to existing public right-of-way network versus private property in the plan study area.

Also, clarify what is intended with the item that states the plan “*would recognize the potential benefits of a grade separated crossing at Bothell Way...*” The conclusions on page 92 state that “*no significant pedestrian impacts are expected under Alternative 3.*”

Provide more detail about the items described under the “All Modes” heading. Specifically, what is envisioned by “*a variety of other required and recommended provisions to improve bicycle mobility and access to transit*” and how this might relate to a specific impact, since none were identified previously. The conclusions on page 92 state that “*no significant bicycle impacts are expected under Alternative 3.*”

- **Section 4.5 – Page 101: Summary of Impacts and Related Mitigation** – The mitigation identified for the SR 522 / NE 170th Street intersection would also likely benefit the pedestrian crossing and safety at this location. However, since much of the added delay at this intersection appears to occur under the No Action alternative, more detail about responsibility for the

Mr. Steve Bennett
January 30, 2019
Page 9

degradation and improvements would be beneficial. Consider providing additional information about the physical constraints to the identified improvements (such as the trail crossing and proximity of utilities).

Merlone Geier Partners appreciates the opportunity to comment on the DEIS. Please contact Jamas Gwilliam at (858) 259-9909, or the undersigned, if you have any questions regarding these comments.

Yours Truly,

FOSTER PEPPER PLLC



Joseph A. Brogan
Attorneys for Merlone Geier Partners

cc: Jamas Gwilliam, Merlone Geier Partners



To whom it may concern

I recently became aware of the suggested population additions proposed for the Lake Forest Park community, and the extension of the Shopping Center. These two issues raise big questions in my mind.

A: Increasing the population of Lake Forest Park Shopping Center. It seems that with the 520 bridge across the lake now having a toll requirement, there has been a significant increase in traffic coming around the top of Lake Washington. This traffic comes through Kenmore then South along Lake City Way (which used to be called Bothell Way). Some of this traffic travels through Lake Forest Park past schools to get to the West side. One must take into consideration the fact that this traffic will now mingle with new traffic from within Lake forest Park. We have school children walking along these roads. And do not forget that Lake forest Park residents do a lot of exercise walking along these roads themselves. . Is this what we want for the future?

Most of the roads in Lake Forest Park do not have sidewalks. Thus with this increase in traffic there will be a need for sidewalks – for safety. If built, who will pay for these ? Additionally, if sidewalks are needed, will this require strips of land be taken from the lot owners to allow room for both the road, and the sidewalk ? At whose cost ?

B: Multi-story buildings in the Lake forest Park Center. This center was built on wetlands as I recall. Concern here is that unless bedrock is close to the surface below the shopping center, the existing ground may not support the weight of these proposed new high rise buildings. Resulting in building settlement among other things.

Then of course there is the need for parking for these new Center residents. And again ground support concerns come into play for any proposed parking building.

C: Wet Land construction: To find the space for the new parking building which will be built in the Lake Forest Park Shopping Center, another Council requirement may have to be scrapped – building on or near existing wetlands. And this issue may be very easily discarded by the fact that the Shopping Center was built on a large wetland. And once again, if these wet land requirements are scrapped, why did we have them in the first place ?

D: Proposed Rapid Transit System: While this Transit System may very well allow residents – and non-residents= to leave their vehicles and ride the train, this alone will increase the number of vehicles parked in the Center. Will this not propose a lack of available parking spots for residents coming to shop ?

I am not against adding to the population of Lake forest Park shopping Center. It seems a reasonable thing to do. But be reasonable and go slowly, otherwise Lake Forest Park can easily lose the charm it now has. Suggesting an overpowering number of new residents for the Lake Forest Park Shopping Center is not a reasonable and rational request at this point.

Paul and Barbara Williams



16749 Shore Dr. NE
Lake Forest Park, WA 98155
Cell: 206-713-7515, Home: 206 361-6266

bandpwilliams@comcast.net

1/29/2019

Steve Bennett
Director, Department of Planning and Building
City of Lake Forest Park City Hall
17425 Ballinger Way NE
Lake Forest Park, WA 98155

Dear Mr. Bennett,

We are thirty-year residents of Lake Forest Park and live in the Sheridan Beach area. We have strong opposition to both alternative plan 2 and especially plan 3. We appreciate the current livability of our community and love the variety of safe modes of transportation within our community be it motor vehicles, bicycles, or as pedestrians who frequently move from our home over to the Town Center. We are deeply concerned about the recommendation to build buildings as high as 75 to 85 feet with high population density up to 1500 units of housing.

The original site was a peat bog and the reason Lake Forest Park incorporated was because the mall was developed against the wishes of the surrounding residents. Therefore, LFP was incorporated so we would have better local zoning ability.

It would be our opinion to increase the density would be against the goals of the community for the following reasons.



1. It makes the traffic density increase dramatically and put higher demands on the services of LFP such as parks and open spaces. Meaning, there are very few opens spaces available to the public now so how can you increase density to 1500 units?
2. It puts tall visual blight in the middle of the city. Instead of green canopy we will have blocked sunlight and tall concrete. Instead of Lake Forest Park we might as well change our name to Lake Cement Park.
3. As stated, the land was previously a bog. Looking at the plans to take away the parking and create below ground parking we think this could cause more water issue such as leaking ground vehicle water into our streams or failure with sump pump issues causing more flooding issues.
4. The parking garage design to attract out of community commuters as a park and ride has a multitude of potential problems with out of control congestion and safety issues our top concern.
5. The intersection of 170th and Bothell Highway will turn into a BIGGER traffic nightmare and safety concern both for cars and pedestrians, not even considering bikes – yikes!
6. Not enough time for both study of these issues and to develop consensus within our community.

PLEASE DO NOT CONSIDER ALTERNATIVE PLAN 2 OR 3!

Sincerely,

Paul and Barbara Williams



LAKE FOREST PARK TOWN CENTER PLAN
NON-PROJECT EIS SCOPING COMMENT FORM



Please use this form to comment on the range of alternatives and elements proposed for analysis in the Non-Project Environmental Impact Statement (EIS) for the Town Center Plan

Provide input on the elements listed for analysis in the EIS (box below). Which elements are most important to you and why?

Are there other elements that should be analyzed? PROJECT NEEDS TO SLOW DOWN - MORE TIME

1] 3] NEEDED FOR PROPER REVIEW. 2] TRAFFIC ISSUES ARE A CONCERN AS FIRST ZONING SHOULD NOT CHANGE. MAX # OF APARTMENTS SHOULD BE 350 AS 5] ALT ONE ~~SHOULD~~ SHOULD BE REDUCED TO 350 BUT 243 ARE NOT ACCEPTABLE

EIS ANALYSIS ELEMENTS:

- » Town Center Environment and Natural Features
 - » Lyon Creek
 - » Existing Trees and Vegetation
 - » Stormwater runoff
 - » Water quality
- » Consistency with Adopted Plans/Policies
- » Planning and Development Land Use Regulations
 - » Transportation and Parking (Traffic Circulation; Access by All Modes)
 - » Public Services (Police, Fire, Schools, Community Services)
 - » Utilities (Water, Sewer, Stormwater Management Facilities, Energy)

What potential impacts are you most concerned about with the possibility of Town Center redevelopment in the future? INCREASED TRAFFIC IS NOT ACCEPTABLE. OBSTRUCTION OF WETLANDS IS NOT ACCEPTABLE.

What mitigation measures should be considered to address these potential impacts?

Limit Development to 350 UNITS.

Any other comments? The process that the LFP city council has taken to get us to this point needs to be explained. We are concerned that some of the city council members do not have the community preservation as the number one reason they were elected.

1/31/2019
David Jardine
16276 38th Ave NE
Lake Forest Park, WA 98155

Steve Bennett
sbennett@ci.lake-forest-park.wa.us
Planning and Building Director
Lake Forest Park, WA

Dear Mr. Bennett,

I have been a LFP resident for over 30 years. I recently attended two meetings related to the Town Center Vision Project: the January 16, 2019 unveiling of the Draft Environmental Impact Statement and the Committee of the Whole Meeting on January 28, 2019. I have significant concerns about proposals in the DEIS. Although three proposals have been put forward, none are satisfactory, so the LFP citizenry does not have a meaningful choice.

Although much the DEIS discusses aesthetics and space utilization, the core assumption driving the DEIS proposals is that a large quantity of multifamily housing (up to 1500 units) will be placed on the site of the current LFP Town Center. At the January 16 meeting there was strong and nearly universal opposition to the amount of housing that was proposed for the LFP Town Center.

Given the current housing distribution within the city of LFP, the proposed housing density is vastly out of character. The LFP Town Center is 20.49 acres in size, representing less than 1% of the land area in LFP (Chapter 3, page 1, DEIS). Currently there are 5340 households in the city of LFP (Chapter 3, page 14, DEIS). The authors of the DEIS proposed to put up to 1500 new housing units on the site of the LFP Town Center (Chapter 2, page 2, DEIS). If this takes place, the housing stock of city of LFP will be expanded by more than 28% and this expansion will entirely be placed on less than 1% of the land area.

Plans regarding such dense development should be specific and detailed. Unfortunately, the DEIS is weak on specifics, frequently stating that in future revisions of the LFP municipal code, the developer will be “incentivized” to provide amenities. The DEIS authors advocate form-based zoning rather than prescriptive zoning because it gives the developers freedom to create structures that the authors claim will work well for the community. Nevertheless, some specifics would be reassuring. For example, the current zoning regulations (Proposal 1) set aside 15,000 square feet for open space. This represents only 1.7% of the total space occupied by the LFP Town Center. While this hardly seems adequate, Proposals 2 and 3, which permit substantially greater housing density, make *no recommendations* regarding open-space. Instead, the authors indicate that at some point in the future, “Updated regulations would clarify expectations related to the amount of open space required and the ways that it could be provided with new redevelopment” (Chapter 4, page 7). This is not at all reassuring, given the proposed concentration of housing units.

In the interests of brevity, I have elected not to critique issues such as building height, traffic flow, parking, and numerous other concerns. The subject of housing density must be settled before answers to these issues can be derived.

It is not clear why our City Council would propose to develop so many new housing units. The King County Growth Management Act mandates that LFP must provide a total of 475 new housing units by 2031 (Page D15, Technical Appendix D, Urban Growth Targets and the Urban Growth Area, <https://www.kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional->

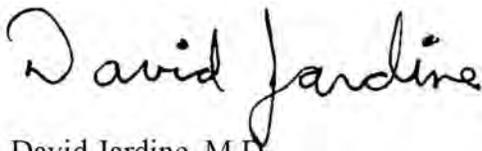
planning/2016CompPlanUpdate/2016Adopted-KCCP/Appendix-D-TargetsUGA-2016KCCP-ADO-112216.ashx?la=en). The housing development at 145th St. and Bothell Way has already provided a substantial number of the mandated units, so the Growth Management Act cannot be the factor motivating the DEIS proposals. Why has our City Council put forward a proposal to build more than three times the number of housing units mandated by the King County Growth Management Act? Why have they chosen to place all these units in one small location? The current effort appears to be the antithesis of community friendly planned growth. Instead, it more closely resembles a generous gift to the developers. All three of the DEIS proposals provide the developers with our consent to turn the Town Center into a high-density apartment complex with little regard for the interests of the community.

It is unfortunate that no City Council members attended the January 16 unveiling of the DEIS. They would have witnessed the anger and passionate sentiments expressed by the overflow crowd. Four members of the Vision Committee (the group charged with developing a vision that was to provide the template for the DEIS) spoke at this meeting. Each person was critical of the DEIS proposals and appeared distressed that the DEIS did not reflect the input or direction from the Vision Committee. Taken together with the issues noted above, these observations indicate that the current process is seriously flawed and should be suspended. New proposals that set forth a more modest quantity of housing should be created. If City Council members really believe that such high population density represents the character and aesthetics of LFP, I would encourage them to meet with their constituents. If these concerns are ignored, and the City Council members put the developer's interests before those of the community, it will undoubtedly become an issue during the next elections.

Summary of Selected DEIS Concerns

- The three DEIS proposals advocate the building of between 500 and 1500 multifamily dwellings at the current LFP Town Center site.
- Currently there are 5340 households in the city of LFP. The DEIS proposals could increase the total housing stock in the city of LFP by over 28%.
- These housing units would be placed at the current LFP Town Center, which represents less than 1% of the land area of LFP, creating an extremely dense population center.
- The King County Growth Management Act requires only 475 new housing units in LFP by 2031, far less than is advocated in the DEIS. Why does the DEIS propose a much larger number of housing units? Does this serve the developers interest or the community interest?
- The DEIS is very weak on zoning specifics. For example, Proposal 1 of the DEIS sets aside only 1.7% of the LFP Town Center for open space. Proposals 2 and 3 do not specify how much open-space should be reserved. Many other issues are similarly vague.
- The DEIS appears to strongly favor developer interests over community well-being.

Sincerely yours,



David Jardine, M.D.
16276 38 Avenue Northeast
Lake Forest Park, WA 98155

F. Lorraine Bodi
Attorney
16541 41st Avenue NE
Lake Forest Park WA 98155
flbodi@gmail.com/206.683.3011

January 30, 2019

Steve Bennett, Director
Lake Forest Park Planning and Building Department
17425 Ballinger Way NE
Lake Forest Park WA 98155
Via email SBennett@ci.lake-forest-park.wa.us

Re: Comments on Town Center Plan Draft Environmental Impact Statement (DEIS)

Dear Lake Forest Park Public Officials:

I am a longtime resident of Lake Forest Park, an environmental lawyer, and previous federal executive manager (over seven years) responsible for numerous environmental impact statements, assessments, and public processes. Enclosed please find detailed comments, requests for revision and new information, and public process improvement proposals for the Lake Forest Park Town Center Plan DEIS and related amendments to the Lake Forest Park Municipal Code (LFPMC). Copies are also being provided to the Mayor and City Council for their review and consideration.

Overall, for the reasons described below, the DEIS is inadequate, incomplete, and misleading about key issues, impacts and features. The alternatives, the heart of the DEIS, are skewed toward dramatic increases in density and traffic, and away from the community's values and needs. A revised DEIS should be prepared and recirculated for public review and comment before a final EIS and decision. If Sound Transit proposals are driving the current timetable for expedited review and decisions, as it appears, those proposals should be addressed separately under the current code and review processes.¹

¹ Disclosure at the January 28 Council Committee of the Whole that Sound Transit will not even apply for parking garage permits until 2022, with 2023 and later as distinct possibilities, suggests that bifurcation is unnecessary: the matters as a whole can proceed on a schedule more conducive to public input and without undue haste.

Purpose and Need: The purpose of the DEIS -- “to guide redevelopment of a vibrant, attractive, transit- and pedestrian-oriented Town Center, consistent with the community’s vision, through the year 2035 “– is critical for the future of the LFP community. The need to plan for and guide future changes and increased development at the Town Center site is undisputed, including enhanced commercial development, increased residential development, service infrastructure, provision of community amenities, and accommodation of pedestrians, vehicle, and public transit. But the foundation and guiding criteria for the new plan and DEIS alternatives should be consistency with the community’s vision, as stated. This is where the DEIS falls seriously short. It is less a document describing alternatives and impacts to meet the community’s vision and much more a document to sidestep and mischaracterize the community’s vision in favor of dramatically greater residential development.

Inconsistency with the Lake Forest Park Vision Framework: The DEIS should use the elements of Lake Forest Park Vision Document as the underlying framework and criteria for describing, evaluating and ranking the DEIS alternatives. The Vision was prepared through broad-based community involvement and represents a strong consensus on our community values and needs. The Vision does not seek to curtail additional density and development, but to guide it, both in magnitude and quality.

The DEIS professes to apply the Vision as a centerpiece, but this is lip service only, lacking accuracy, transparency and full disclosure. The DEIS implies a community vision in support of alternatives that would increase density by 700-1500 units, all located at the Town Center itself. In contrast, Vision Task Force members indicate that an increase of approximately 400 units at the Town Center was what was previously discussed and contemplated. For more details on this topic, I incorporate by reference the comments of the Vision Task Force Members to Steve Bennett dated January 24, 2019, describing critical issues where the DEIS completely diverges from the Vision Document.

Because the DEIS alternatives fail to accurately reflect the community Vision Document, the DEIS alternatives and their analyses are seriously flawed and must be redone and circulated to the public in a new DEIS.

Inconsistency with the Lake Forest Park Comprehensive Plan: Similarly, the DEIS is wholly inadequate in addressing the Lake Forest Park Comprehensive Plan, adopted by the Council in 2016 and designed to guide planning and decision making until 2035. The Plan identifies a growth target of 551 new housing units across the entire city, not just the Town Center, and covers the same period as the DEIS. Yet the DEIS treats the Plan targets as irrelevant, proposing only alternative ranging from 700

to 1500 new housing units, located at the Town Center alone. Alternatives 2 and 3 more than double this target at the Town Center location alone, unreasonable expectations for the next 20 years. Proposing 700-1500 new residential units in a community of about 5000 households seems drastically out of scale. Instead of supporting the community's vision, the DEIS supports windfall profits to the Town Center owners through unnecessary upzoning. Why not wait until the current growth targets are close to being achieved to increase them?

Because the DEIS alternatives fail to accurately reflect the 2016 Comprehensive Plan, and do not even include an Alternative reflecting an allocation of the 551 units in the Plan to the Town Center site, the alternatives and their analyses are seriously flawed and must be redone and circulated to the public in a new DEIS.

Inconsistency with the Current Code: The current code provisions for the Town Center call for 150-250 new residential units in the Town Center, density of up to 7 dwelling units per acre, and max height of 4 over 1 in Northern section of the site, and 3 over 1 with peaked roofs in Southern section, assumed to be 45-foot max height. This is much less density than provided in even the No Action Alternative, which purports to reflect existing conditions.

Once again, proposing 700-1500 new residential units in a community of about 5000 households seems drastically out of scale. Instead of supporting the community's vision, the DEIS supports windfall profits to the Town Center owners through unnecessary upzoning. Why not wait until the current code targets are close to being achieved to increase them?

Because the DEIS alternatives fail to accurately reflect the amount of development under the current code, and do not even include an Alternative reflecting 150-250 units at Town Center site, the DEIS alternatives and their analyses are seriously flawed and must be redone and circulated to the public in a new DEIS.

Insufficient Evaluation of Traffic and Parking Impacts: Traffic, resident parking, and infrastructure impacts of all 3 alternatives are unaddressed or downplayed, but will have major impact of our community and quality of life. The DEIS should analyze how the redevelopment will be conditioned and restricted to manage these impacts.

The separate traffic and parking analysis performed for the DEIS suffers from obvious and major flaws related to its slanted design and implementation. At the recent public meeting, the traffic consultant indicated that the analyses assumed increased traffic and parking would not occur because increased residential traffic and parking from new housing would be offset by a decrease in commercial traffic and

parking. Because the Plan anticipates continued active commercial and community use of the Town Center site, this assumption is seriously flawed. In addition, the study ignores even existing traffic and parking impacts and pressures, let alone new impacts. It is abundantly clear to any resident of LFP that congestion on Bothell Way generally, at the Town Center site, and at the Ballinger intersection is already resulting in significant cut through traffic on numerous residential streets, an issue that will be exacerbated with increased density. There is a critical public safety element that should be included in the evaluation as well, in coordination with the Fire Station, since fire trucks are already delayed and impeded in getting out onto Bothell Way. The DEIS should acknowledge and assess these increased traffic and parking pressures more honestly and propose how they will be addressed.

Insufficient Consideration of Open Space, Community Space, and Infrastructure Impacts and Mitigation: Public space and infrastructure issues are not discussed forthrightly or meaningfully in the DEIS. Impacts and mitigation are not treated as discrete topics, making it difficult to assess what mitigation will be considered to address specific impacts. The community deserves to know what specific mitigation is being considering and committed to address the significant impacts associated with implementation of the Plan alternatives.

Sidewalks, parking areas, and other access points should not be considered community open space. Outdoor open space and green space areas should be described and expressly identified and analyzed as mitigation actions for increased development in the DEIS. Plaza seating and meeting areas and a playground would be desirable. Continued space for the Farmers Market should also be identified. Community meeting space should be considered in a location that is not the rooftop of a parking garage. Who will want to go climb up to the top of a parking area (or even a building) just to site there without the kinds of access and amenities that the common space has now?

Little consideration is focused on impacts to water, utility, school and other infrastructure issues. This evaluation in the DEIS should be expanded, in coordination with the utility providers and the school district. In addition to clarifying impacts, how will impacts to utilities, water resources, and schools be mitigated?

Impact fees linked to increased development as mitigation should be considered and discussed as a means to support open space, community space, and infrastructure impacts.

DEIS Evaluation Criteria and Matrix Ranking: Based on my environment assessment experience, here is an effective recommended approach for improved and more accurate consideration of alternatives in relation to community vision and values, as well as environmental impacts generally. A matrix and narrative should be prepared displaying primary evaluation criteria drawn from key elements of the Vision Document, the Comprehensive Plan, the current code, and any other major issues flagged by the community.

Each of the alternatives should be ranked against these criteria compared to current “on the ground” conditions (not maximum allowable under current plans and code), using a good-fair-poor and/or red-yellow-green designation. Ranking criteria should include Housing Density under the current Plan and code, Housing Type and Height, Open Space features, Native Vegetation, Sustainability, Transitions from High Density to Single Family Residential Area, Traffic and Traffic Congestion, Pedestrian Improvements, Commercial Amenities for the Community, Availability of Free Community Parking, Community Meeting Indoor and Outdoor Space, etc. A separate section of the matrix should briefly describe mitigation approaches.

A matrixed approach with clear criteria will be transparent and a valuable disclosure and communication tool. It will also help to demonstrate and document that critical community values and needs tend to favor a revised Alternative 1 (with 150-250, rather than 700 residential units, more accurately reflecting existing plans and documents). In contrast, the matrixed approach will help evaluate and document the far more negative consequences on community values and needs of Alternatives 2 and 3. A revised Alternative 1 can allow for increased development at the Town Center, better managed for preservation of open space, community space, pedestrian use, resident parking, traffic management, etc. Alternatives 2 and 3 are too high, too dense, too hostile to open space, community space, resident parking and traffic, and environmental protection. They simply don’t reflect the vibrant community we want for the future LFP.

Revised Alternative 1 and Preferred Alternative: The current description of Alternative 1 purports to reflect existing condition, but actually reflects a maximum potential build out under existing Plans, code, and discretionary “urban guidelines.” Alternative 1 should be divided into three subsections, the first (Alternative 1A) reflecting current condition as they exist on the ground, which should be the environmental baseline against which environmental impacts are evaluated and assessed. The second (Alternative 1B) should address impacts associated with increased development allowed under the current Plan and code, without applying any

increases associated with discretion under the urban guidelines. Alternative 1C can focus on the elements of Alternative 1 in the January DEIS, which contemplates maximum build out, density, etc. under current law, regulations, and policies.

A revised DEIS should also include this modified Alternative 1 as the preferred alternative, to demonstrate our public officials' support for community values and vision rather than a future with dramatic increases in density. Upon full build out of Alternative 1 a decade or more in the future, the City can always reevaluate its Town Center Plan based on specific development experience and community values and needs at that time. Why commit to such greater development now when even the current Vision, Plan, and code have not been fully developed? Why commit to such greater development now, providing a windfall to the Town Center owners, in advance of a specific proposal for increased development?

A better approach would be to use these three Alternatives (1A, 1B, 1C) as the centerpiece of a redone DEIS, designating them as new Alternatives 1, 2, and 3. This would allow consideration of as many as 700 new residential units, certainly reasonable in a community of about 5000 households and certainly generous in light of a 20-year growth management target of 551 units for all of the City. Current Alternatives 2 and 3 would be dropped from consideration at this time.

Public Process: The schedule between the DEIS and final adoption is unreasonable, perhaps indicating that decisions have already been made by the City, before full evaluation of impacts and public comment. Moreover, the truncated schedule allows little consideration of public comments or debate, or incorporation of significant changes for the final EIS. In decades of environmental work, I have never before seen such a major DEIS covering plans over a 20-year horizon with such a short and perfunctory schedule for DEIS comments and final EIS adoption. If Sound Transit parking garage proposals are driving the current timetable for expedited review and decisions, those proposals should be addressed separately under the current code and review processes.

At the very least, additional opportunity for public input and consideration, including a new or revised DEIS, and a longer schedule before adoption of a final EIS are essential.

In closing, I'd like to encourage our public officials to act in support of growth and guidelines that are consistent with our existing plans and community vision. The DEIS and the Council should not elevate (literally) maximum development over community values and needs – without even a proposal for redevelopment of the

Town Center site on the table. Instead they should represent our community to the max, and adopt a new more thorough and transparent DEIS -- with full support for a revised Alternative 1 as the preferred alternative.

Sincerely,

A handwritten signature in blue ink that reads "F. Lorraine Bodi". The signature is written in a cursive style.

F. Lorraine Bodi

cc: Mayor and City Council Members

My thoughts on Development of Town Center

I attended the open Meeting last week and I was also a participant in the Community Planning meetings several years ago when we came together for a number of sessions to determine what the general population felt regarding redevelopment of Town Center. At that time the consensus was there should be some limited apartment space incorporated into the commercial center. We considered this to be apartments for retired people, generally, who no longer wished to have responsibility for property upkeep and who wanted to be near shopping facilities and to have bus access. The space could also include affordable, but comfortably sized apartments for working residents. The buildings were not visualized to rise more than 4 stories, so we were not looking for a large amount of housing.

The current roofline above the Third Place section is quite pleasant. No flat roofs, Please!

I don't think buildings could be built covering the majority of current parking areas, as is proposed in two of the City's proposed plans. This is all built over a wetland! Are there restrictions against buildings over a large wetland?

3rd Place Commons should remain where it is. Will not 3rd Place Books also be a tenant after redevelopment? It is a very compatible co-existence. The location of the Commons is convenient to access and its location also exposes patrons to commercial businesses in the mall. Please do not place the Commons on top of a parking garage! I consider that suggestion totally unacceptable!

I can visualize three locations for parking garages, which would not exceed three stories and would not be too distracting. One would be north of the north wing of the mall structure. Another parking garage might work in the eastern end of the south lot, and a third could be north of City Hall and the Professional building. All should blend in with the chosen roof style. A considerable amount of surface parking could still be available. This should accommodate the additional need for bus riders and car-poolers, and eliminate the need for parking in neighborhoods, as is now the custom. This is presuming that Kenmore, Bothell and other towns are also increasing their parking facilities.

I feel there should be a significant "green space" along the mall side of Lyon Creek as it flows parallel to Bothell Way. It should be at least as wide as the traffic lane there plus two rows of parked cars, should be vegetated with a considerable

number of trees and attractive plantings. Native plants should be predominant. It should have a pleasant foot path for its entire length.

The idea of a "green space" adjacent to the south side of the commercial east wing of the business mall, possibly accessible as a space for the Farmers' Market sounds quite do-able and pleasant. The idea of some added vegetation surrounding this space, which would be a street at other times, would help soften this area.

As a long-time resident who loves Lake Forest Park, I do not want to see our mall covered with parking garages, and it is not necessary. I wish to see our primary buildings and to feel it is still Lake Forest Park!

Thank you for considering my comments.

Sincerely
Mamie Bolender

Nancy Bradburn-Johnson
19307 - 37th Avenue N.E.
Lake Forest Park, WA 98133
206 367 2854 Bnj4@aol.com

January 31, 2019

Delivered by E-mail

Re Comments on the Town Center Plan Draft Environmental Impact Statement (DEIS)
January, 2019

Dear Planning Director Bennett, Lake Forest Park City Council Members, and Mayor Johnson:

Thank you for the opportunity to comment on the Lake Forest Park Draft Environmental Impact Statement (DEIS) which was issued in January, 2019. My general comments are followed by some of my specific comments and questions about the DEIS and the relationship between the DEIS and the City of Lake Forest Park. The DEIS is a dense document which raises many questions.

My husband and I have lived in Lake Forest Park since November, 1985. We moved to LFP from Lynnwood because of the excellent school district, the large treed lots, the lovely neighborhoods, the community's environmental concern, and the availability of a large house that included a mother-in-law apartment for my recently widowed mother.

General Comments on Town Center Plan Draft Environmental Impact Statement (DEIS)
January 2019

1) Proposed Housing Changes Are Harmful to Current Nature of Town Center. The large number of housing units proposed, which the DEIS states is between 700 and 1500, will materially change the nature of the Town Center, which the DEIS accurately states is the "Heart of the Community," from a shopping, retail, and gathering center to a dense housing complex with fewer shops and a gathering space (The Commons), which is highly valued by the residents, that may end up banished to the proposed park-and-ride garage, away from eateries, the bookstore, and retail.

2) Proposed Changes Create a Poor Legacy. The densities proposed in all three Alternatives, will increase the population of Lake Forest Park, and as a consequence, will impact the character of the community, which is now predominantly single family homes. The sheer number of proposed housing units, even at 1,000, predictably will increase the need for services, will result in the emotional detachment of the unit dwellers in the good of our community, and potentially negatively affect the outcomes of school levies as well as create an impact on the enjoyment and frequent access of the Town Center by families. The proposed redevelopment will create a poor legacy for our town.

3) Proposed Parking Garage Is A Bad Idea. Does LFP really need a commuters' park-and-ride in our town? There is no research to show that LFP residents will use the garage. The SP3

garage for a *minimum* of 300 cars will create a commuter culture at the Town Center which does not exist currently and will only compound the cut-through driving issues which currently exist in LFP. In addition, the traffic issues which currently exist on SR 104 and SR 522 will be compounded. Given the proposed location of the garage, it is not likely that the garage will generate retail sales, as given the proposed placement to the retail shops, people are not going to be venturing out to shop in the Town Center, especially since the number of shops may be reduced. The DEIS has not adequately addressed the increased need for security or City law enforcement, nor has it discussed the impact should the 300 spaces be inadequate, which is easily foreseeable. And the DEIS does not address at all the issues of additional pollution created by the 300 commuters attracted by this parking structure.

4) DEIS Flawed and Process is Unreasonably Rushed. The value of the DEIS to the City Counsel Members and Mayor in making an informed decision seems questionable. To simplify my comments, see, letter dated January 30, 2019 from F. Lorraine Bodi, Attorney, to Steve Bennett, Director Re Comments on Town Center Plan Draft Environmental Impact Statement (DEIS), which is incorporated by reference as though fully set forth. The process for adoption and code changes seems unnecessarily rushed and disconnected from the views of the majority of the residents in LFP. The combination may very well open the City up to legal challenges.

5) LFP May Be Missing Opportunities. The DEIS itself does not contain any information about impact fees, impact fee credits, or development fees which could be an important consideration regarding the City of Lake Forest Park's budget. If necessary, the City might want to invite speakers from the City of Bothell or the City of Kenmore in to help in understanding how these fees could be of use. It also seems that the City may be losing an important strategic advantage by proceeding in a way that will grant Merlone Geier Development an immediate windfall through code changes.

Specific Comments on Town Center Plan Draft Environmental Impact Statement (DEIS) January 2019

The comments below follow the order of each of the four chapters and page numbers for each of those chapters.

1. Fact Sheet Description of Proposal and Alternatives Page 1: "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, through the year 2035." Does the emphasis in the DEIS on "transit- and pedestrian-oriented Town Center" mean that the Center role as the heart of Lake Forest Park, as a day-to-day gathering place for LFP residents to shop, eat, father, and enjoy the Commons, is being replaced? (See page also Chapter 1.0, page 1 which recognizes that "[t]he Town Center has long served as the heart of the Lake Forest Park community....")

2. Chapter 1.0 Page 1: As I understand it, ST3 has “identified Town Center as the representative project location for a new park-and-ride structure with space for a *minimum* of 300 vehicles.” (yourlakeforestpark.com “What is Town Center Vision”) What is the maximum number of vehicles for the new park-and-ride structure at Town Center? What benefits will the City of Lake Forest Park receive if the garage is located in our town?
3. What public amenities, if any, would be lost with adoption of each Alternative (1,2, and 3)?
4. Chapter 1.0 Page 2: Why does the DEIS veer away from the Vision Task Force report regarding the number of housing units envisioned?
5. Chapter 1.0, Sec. 1.1 Page 4 Dates/Steps in Process: Why has the City Council proposed such a short turnaround between the Public hearing on the DEIS on January 16, 2019 for the EIS finalization in February 2019 with anticipated Adoption of the Town Center Plan and code changes to be considered by the Council as soon as 2/20/19?
6. Chapter 1.0, Page 4 Summary of Alternatives: It appears that the majority of the LFP residents do not favor Alternatives 2 and 3. Could you explain what is meant by the phrase “development intensities and related impacts analyzed in the DEIS alternative” means, in plain English?
7. Chapter 1.0, Page 5 Summary of Impact Analysis: “each phase of redevelopment would need to include more detailed project-level analysis to determine the level of improvements that would be required to accommodate the project...” Could you explain what is meant by this phrase, in plain English, and provide us with examples and a range of anticipated costs?
8. Chapter 1.0, Page 5 Summary of Impact Analysis: “The analysis of potential effects found that with implementation of proposed and recommended mitigation measures, significant unavoidable adverse impacts would not be anticipated under any of the alternatives.” How will the proposed and recommended mitigation measures be monitored during development to ensure compliance? What is the City of LFP’s role in monitoring? Will there be a cost to the City of LFP for such monitoring efforts? Chapter 4.0, Section 4.3, page 66 also states that because of the slow incremental development no significant unavoidable adverse impacts would be anticipated, but this does not seem to answer how these adverse impacts would actually be mitigated; please explain.
9. Chapter 2.0 Page 1: Redevelopment assumptions associated with each of the three alternatives are further described in Table 2.1. What are the assumptions based on? For example, what if the assumption that 300 commuter spaces is not valid and ST3 decides to include more spaces? What happens to Commercial, City/Public Use under

Alternative 1—is such use lost if the garage is built; if so how will that change the nature of the Town Center as the heart of the community?

10. Chapter 2.0, page 3: What is the assumption based on that “some form of shared use agreement” could be reached with Sound Transit for “off-hours use of the commuter park and ride garage spaces”? And what are the alternatives if no agreement can be reached?
11. Chapter 2.0, Page 3: It appears that only one potential approach under Alternative 1 is given but the “potential approach” does not accurately describe or summarize the work of the vision statement, which was to be used to guide future redevelopment and help ensure that it is designed to best serve the needs of LFP citizens now and in the future, “resulting in an enduring, people oriented Town Center that is consistent with the community’s values.” (See, Vision Document Final Draft, http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/vision_document_final_draft_lo-res_.pdf, Page 1.)
12. Chapter 2.0 Pages 4-6: What is the basis for the housing unit numbers? What is the anticipated square footage of the units in each alternative? What is the character of the proposed housing units: apartments or condominiums?
13. Chapter 3.0, Section 3.1 Pages 14-19 Town Center Character and Land Uses: The facts and figures are helpful, but don’t seem to acknowledge and emphasize the small town nature of the LFP community, and the majority of the residents’ wishes to keep the small town character of the Town Center.
14. Chapter 3.0, Section 3.1 Page 20: Sound Transit ST3 Bus Rapid Transit System: “The BRT would provide fast, reliable, frequent transit service in LFP and other communities along the corridor.” Does the City of LFP know what is meant by frequent transit service to LFP? So far only the 522 and the 308 travel along 522 near the Town Center, and both are commuter oriented, so they are not available all day, e.g. for a quick trip downtown and back.
15. Chapter 3.0, Section 3.2 Page 24: Who will be responsible for paying for the initial landscaping and for the maintenance of the landscaping? If the City of LFP is responsible, what will be the cost? What is the current the City of LFP budget for landscaping costs?
16. Given LFP’s commitment to the environment, do any of the Alternatives include buildings which will be certified as “green” buildings? If so, does this change any of the analysis for the DEIS?

17. Chapter 3.0, Section 3.2 Page 27: what will be the cost to map all of the on-site storm water facilities at the Town Center, and will such mapping be paid for by the City of LFP? If not, who will pay?
18. Chapter 3.0, Section 3.2 Page 28: It appears that the most current mapped depiction of the community's tree canopy was published in 2010. This depiction seems outdated, especially given the development in the past 9 years; is a more current assessment of the tree canopy planned?
19. Chapter 3.0, Section 3.3 Page 39: The LFP Police Department is currently understaffed; the DEIS states that with the proposed housing unit development the population of LFP will increase between 11 percent to 27 percent (see DEIS, Chapter 4.0, Section 4.3 page 49). How will the police department under-staffing be addressed? What revenues will be made available to increase the police force?
20. Chapter 4.0, Section 4.3 Page 66: I would like to see a local post office at Town Center; the Town Center did have one for many years at Sandy's Hallmark.
21. Chapter 4.0, Section 4.5 Significant Unavoidable Adverse Impacts Page 102: Please explain how the currently unmanageable heavy traffic at peak commuter times can be mitigated and who is designated as responsible for the mitigation?
22. Has Sound Transit actually announced that LFP has been chosen as a final transit site? Aside from potential funding, is there any reason why LFP would want an influx of commuters at LFP Town Center? Could you please set out the analysis, including costs and benefits, used to determine whether the STP3 parking garage is desirable in this community?
23. Could the Council separate the ST3 proposal from the redevelopment proposal to allow more time for consideration of the redevelopment? What are the reasons considered by the council to combine both proposals, and what are the consequences? What are the reasons which were considered to separate the proposals, and again, what are the consequences of separation?
24. What are the projected revenues, including usage fees and development fees, for the City of LFP for each proposal (Alternatives 1, 2, and 3)? Please provide a general breakdown of revenue sources and amounts for each Alternative.
25. What are the projected costs for adopting each Alternative, including improvement or upgrades of infrastructure (e.g., roads, signage, sidewalks, etc.), services (such as electricity, water delivery), law enforcement services, etc.?
26. How is the traffic going to be handled into and out of the Town Center for each proposal? During heavy or even moderate traffic now, there is currently insufficient

road space. How will medical, police or fire equipment access into the Town Center be impacted? How will medical, police or fire equipment access be impacted by the increased traffic leaving Town Center? Is a plan in place, or projected to be worked on, to deal with the traffic bottlenecks into and out of the Town Center?

27. Has any consideration been given to the type of housing unit proposed and the consequences—it is not clear whether these units are proposed as apartments or as condos? Apartment dwellers have no long-term vested interest in the community and as such are not likely to approve school levies for example. It appears that most of these housing units are designed for 2.1-2.4 tenants, which is not in keeping with the family-oriented nature of the LFP community.
28. Chapter 4.0, Section 4.3 Page 50: The DEIS recommends that specific analysis will be needed as part of the City's cyclical capital planning, operational, and budgeting process. How much will this specific analysis cost? All of the Alternatives will result in a significant increase in LFP population (between 11 percent and 27 per cent), has the Council given any thought to transitioning to full-time Council members? Has the Council considered payment for Council member positions, and if so, what is the proposed cost?
29. Chapter 4.0, Section 4.2 Pages 42 and 46: What would be the range of costs for a geotechnical analysis, which is needed to inform development "given the potential for shallow groundwater conditions" and for geotechnical analysis/reports required for each proposed phase of redevelopment and proposed construction? Who pays for these geotechnical analyses?
30. How much has been spent by the City of Lake Forest Park in real dollars on the consultants (Otak) for this DEIS from inception to date?
31. Chapter 4.0, Section 4.1 Page 21: Can you please explain how the conclusion was reached that there would be no Significant Unavoidable Adverse Impacts because of architectural treatment, building articulation and setback and screening for Alternatives 2 and 3?
32. Chapter 4.0, Section 4.1 pages 9 -10: Why do the proposals place the Commons on the "upper levels of the commuter park-and-ride garage" and away from the eateries (see chapter 3.0, Section 3.3 page 13), retail space (Chapter 3.0, Section 3.3, page 11) and the bookstore which the Commons enjoys a collaborative relationship with (Chapter 3.0, Section 3.1, page 7) where it is now located? It appears that such placement would require use of an elevator which impacts the easy ingress and egress that the Commons currently enjoys? Will SP3 allow any use of the garage and if so, will ST3 charge for such use?

33. Who is responsible for maintenance, security, and improvements to the ST3 garage? If LFP is responsible for costs, please provide a breakdown of estimated annual costs and what those costs will be.
34. Chapter 4.0, Section 4.2 Page 56: It appears that balconies and patios count as “open space” but usually such spaces are accessible only by the owners/dwellers, not to the community at large. Please address how much “open space” is available to community access in square feet and how much of the proposed “open space” is accessible only to individual dwellers or to retail shop customers?
35. Chapter 4.0, Section 4.5 page 81: It is unclear whether the SP3 garage will be all above-ground. Is any part of the SP3 garage to be underground? If so, what are the environmental impacts and the costs?
36. Chapter 4.0, Section 4.5 Beginning at Page 81: There is no discussion about the impact on cut-thru traffic or the impact (environmental, economic, etc.) created by commuters coming to the community to park if ST3 is built. Is the City convinced that commuter parking benefits the community or the Town Center in any significant way? What are the disadvantages or costs associated with locating the garage in LFP? Couldn't the space that would be taken by the garage be better utilized to fit with the community's values and stated preferences?
37. Will there be a residency requirement to apply for a housing unit, as there is in Redmond?
38. Why is density being pushed in LFP—LFP originated as a planned community with single family housing and large lots. Can you address what information the Council or consultants have received that leads to the conclusion that LFP residents would be interested in this proposed change in character?
39. How do any of the Alternatives improve the quality of life for the average LFP resident?
40. The DEIS does not address what kinds of amenities are being discussed. What kinds of amenities will be provided? How does LFP plan to hold the developer(s) to include these amenities; are impact fee credits being discussed?
41. Are use fees, impact fees, impact fee credits, or development fees for the city being proposed; no mention seemed to be made of them in the DEIS?
42. The Merlone Geier website (MerloneGeier.com) states that Merlone Geier actively manages the acquisition, development, redevelopment and ownership of retail and retail-driven mixed use properties, and includes significant physical redevelopment. The Merlone Geier website also states that the company is “always looking for the next great opportunity.” The Company also owns Northgate, which is now in the midst of a huge redevelopment. Yet the representative for Merlone Geier stated at the public

Letter to Director Bennett, et al.
Comments re LFP DEIS January 2019
January 31, 2019
Page 8

meeting on January 16, 2019 that the LFP Town Center was a “perfectly good retail center from their perspective” and that MG did not have a plan to develop. What is the City Counsel’s position as a whole about Merlone Geier?

43. Will the content of the DEIS comments letters and emails be made available for review?

44. The DEIS seems to contain little analysis of the park-and-ride structure. When will this structure’s impact be studied? How does the installation of the ST3 parking garage improve safety as seems to be required under LFPMC 12.35.030 given the increased traffic?

In closing, I would also like to thank both Mayor Johnson for attending the Public Hearing on January 16, 2019 and Council Member Mark Phillips for attending the public meeting on January 30, 2019, and listening to the community’s concerns and feelings. Your presence was keenly noted by many attendees at both events.

Thank you for your consideration and hard work. Please feel free to contact me if you have any questions about my comments.

Very truly yours,



Nancy Bradburn-Johnson

Brian L. Johnson

19307 37th Avenue NE
Lake Forest Park WA 98155
(206) 367-2854 / bnj4@comcast.net

Re. Comments on the Town Center DEIS

Dear Mayor Johnson, City Council and Planning Commission Members,

As a member of the Lake Forest Park community for over thirty years, I have to express my dismay and concern at what appears to be another attempt by city officials, in less than a year, to rush through a proposal to greatly increase housing density well above what this community needs or wants, this time in the guise of improving the Lake Forest Park Town Center.

In lieu of writing a long, drawn out letter outlining my own concerns regarding the three options outlined in the current DEIS, I would instead refer you all to Lorraine Bodi's comments in her response emailed to Director Steve Bennett, dated January 30, 2019. Her response points out the inconsistencies, inadequacies of the current DEIS and its disconnect from the values and vision of this community. She makes a valid case for slowing this whole process down and drafting a Revised DEIS more consistent with the current community values and vision, the LFP Comprehensive Plan, and current codes for the Town Center.

I agree with her suggestion to scrap Plans 2 and 3 of the current DEIS and using Plan 1 exclusively, providing three (or more) options for increasing development within that framework from a baseline of what is there now to a maximum build out allowed with current codes, laws and policies.

Finally, again, let's slow this process down. There is no need to rush. It was pointed out during the last Council Committee of the Whole meeting on January 28th that Sound Transit has decided to wait at least until 2022 to even apply for permitting for their parking garage, with 2023 or later being possible as well. So, if this whole planning process for the Town Center redevelopment is tied to Sound Transit's schedule, why the urgency?? If it isn't, again, why the haste??

Lake Forest Park has a thriving and passionate community with a true self awareness as reflected in the Town Center Vision Plan. This community is actively trying to reach out to you, the city officials, to help us realize that vision. As I see it, as a member of the LFP community, it is our responsibility to let you know what it is we would like to have and achieve. It is your responsibility as our elected officials to let us know what we can afford. Once that is established, we work together to achieve what is possible. To do that requires trust, openness, communication, cooperation and compromise. Let's work together and do it right, for the current and future generations.

Sincerely,



Brian L. Johnson

To:
Steve Bennett
Director, Department of Planning and Building
City of Lake Forest Park City Hall
17425 Ballinger Way NE, Lake Forest Park, WA 98155
Email: steve@cityoflfp.com <steve@cityoflfp.com>

Cc:
Mayor Jeff Johnson, and the Lake Forest Park City Councilmembers

From:
Andrew Reay-Ellers
3569 NE 182nd Street, Lake Forest Park, WA 98155
Email: capt_reayellers@yahoo.com

Re:
Comments to Town Center Plan DEIS

Date:
1 February 2019

Dear Director Bennett,

I have attended a number of the meetings (informational, visioning, etc.) regarding the potential re-zoning of the LFP Town Center, and been submitting comments and feedback in various forms throughout the process. I have read through the DEIS which has been prepared. I while I generally support extensive redevelopment of the site, I would suggest that the plans consider --or in some cases, not overlook-- a few addition details, which I will list below.

In general, the site as it currently stands must be considered as a blight. No doubt there are parts of it which are “punching above their weight” --especially the bookstore & Third Place Commons-- but for the size of the land it occupies, it poorly serves the community and the environment. Acres of asphalt, an under-performing strip mall, no housing on site, and all of it designed for vehicles, NOT humans in a park-like community.... This type of development was created in another age, and has contributed to effects of urban sprawl; which in turn causes massive environmental degradation, not the least of which is climate change. It is difficult to imagine that any “environmental impacts” caused by the re-zoning of the properties (and thus allowing redevelopment) which could be much more negative than the status quo.

All of this is why I strongly support zoning changes which will encourage as much residential housing as possible; as full an integration with the area transit systems as can be achieved; and the inclusion and restoration of natural elements to the site.

A few thoughts:

1.) Area Included

The western boundary of the area to be re-zoned should be moved to 44th Ave NE. As it is, the properties which currently make up the “town center” will be encumbered by the shape, size, and layout of the current boundary lines in their ability to redevelop in smart and effective ways --and they will be limited in the capacity to incorporate features the community desires such as open space, public venues, and variety. Extending the “Town Center Zone” to 44th would allow direct access from the community into the site, would give greater latitude for the developer to incorporate natural features like Lyon Creek, and would introduce greater flexibility in the type and arrangements of structures to be built.

Likewise, the properties along the eastern side of 44th are surely going to be negatively impacted by multi-story buildings going up just beyond their back lot lines, so it is only fair and justified that they be given the chance to realize increases (rather than decreases) in property value. The nearby neighbors would be loath to see commercial development allowed along 44th --bordering into their neighborhood-- so perhaps re-zone this strip as a transition-zone of mid-rise, residential-only uses.

2.) Topography

While DEIS mentions the topography of the area (see DEIS figure 3.2.1), the plans and alternatives listed in the DEIS fail to adequately recognize and appreciate the elevation change which happens across the breadth of the site. The front door of the Windemere Real Estate Office, at the north end of the site, is approximately twenty-five feet (two stories!) higher than the front door of Starbucks at the south end of the site. The eighty-five foot buildings mentioned as being potentially allowed in DEIS Alternative #3, while seeming potentially acceptable in the lower, southern property -- would tower significantly higher in the north end.

Perhaps the eventual zoning could either require all structures on the entire site conform to the base-plane elevation of the southern corner (approximately the grade height of SR 522 at the intersection with Brookside Blvd), OR the zoned heights allowed could be different in different areas of the site.

3.) Open Space “Carrots”

Throughout the visioning process, the community made it abundantly clear that there is a strong desire to incorporate open spaces and natural elements on the site. These features could be encouraged through incorporating defined trade-offs in new zoning rules. The building heights allowed could be limited to those suggested by Alternative #2, BUT rules could be included which allow the higher building heights suggested in Alternative #3 *in exchange for* valuable and desirable features like additional open space, public amenities, etc. These trade-off could even allow for these features to be in areas immediately adjacent to the town center -- properties not zoned for development, but totally appropriate for nearby pocket-parks, conservation areas, etc.

4.) Incorporate Transit

The zoning should also offer incentives to developers to incorporate strong connections to, and support of, the coming BRT line. Rather than simply being something a development on the site has to put up with, the property owners and developers should be rewarded for making the transit infrastructure an integral part of the site. This might include (but should not be limited to) an actual, weather-protected station, dedicated walking and biking routes in and out of the station, helping to support and/or fund a pedestrian bridge, etc. The incentives, as mentioned in #3 above, could include allowing greater building heights, but also more flexible parking requirements (since good transit connections should somewhat obviate it's need), etc.

5.) Rise Above

One issue which was raised at every meeting I've attended is the desire to "bridge over" of the 522 corridor so pedestrians, bicycles, etc. have a safer and more direct route to the lake and the Burke-Gilman trail. With the coming of the Sound Transit bus-rapid-transit line, which will have significant transit stops on BOTH sides of SR 522, the need for a safe, obvious, high-capacity grade-separated connection across this state highway becomes even more necessary.

It is noticeable that the Third Place Commons -- currently by far the site's largest, and best-visited gathering place (AND the entire northern "upper" parking lot and plaza) is at the same elevation ("altitude") of a pedestrian bridge across Route 522. The city should use everything in its power --incentives, zoning, building allowances, etc.-- to encourage the "new" town center to have it's principle public spaces and commercial retail services at this raised level, so that when pedestrian access is designed and built across the highway corridor, it aligns in elevation with the core uses of the site. At the very least, the build types should allow mixed-use/commercial on the second story of all buildings -- currently this is only envisioned under the scenario of Alternative #3 (see DEIS figure 4.1.1).

In Closing, let me just repeat that I support changing LFP's zoning regulations to allow for a significant redevelopment of the entire Town Center Site. I believe this will be good for our city, the broader area, and the environment of our planet.

But as large as the properties are, they are still relatively constrained by their size and shape. If adequate growth AND significant public features are to be accommodated, there needs to be an attention to details in planning and design. The "smart design" necessary can be encouraged and fostered by the city zoning and planning rules -- so it is of paramount importance we take this opportunity to get as much as possible for the community out of this process, and to encourage developments which will serve as assets to the city and citizenry.

Regards,



To: Steve Bennett, Director of Planning and Building
City of Lake Forest Park City Hall
17425 Ballinger Way NE, LFP WA 98155
DEIS Impact Analysis- Missing/Incomplete or Inaccurate Items

Archeological review is not mentioned- The Merlon Geier property and surrounding areas were important seasonal grounds of native people for water and food gathering. “Unsuitable soils for development may be removed from site and replaced with suitable soils supportive to the development activities of each phase” page 43. **Native tribal representation should be present on site** when ‘unsuitable soils’ re: native soils are removed. Significant archeological sites in the Northwest have frequently been exposed during excavations. It has been my understanding that the lower mall area was lightly covered due to concerns in the early 1960’s of the area being an important site of early habitation.

Shallow aquifer protections/monitoring missing- Page 42, “Given the potential for shallow groundwater conditions, geotechnical analysis would be required to inform future development and construction methods to minimize impacts...” Given our reliance on the aquifer to provide drinking water and it’s impact to fish habitat as it flows into Lake Washington, any detrimental impact to either water quality or quantity that a aquifer breach might cause is not tenable. **Monitoring wells** should be installed during and remain after project to allow constant monitoring of the aquifer.

Surface water management Rain Garden Inaccuracy- Page 28 “The rain garden helps to protect Lyon Creek as it *cleans stormwater runoff* from a portion of the parking lot between Bank of America and City Hall.” Rain gardens remove some petrochemicals and can improve bacterial counts but there are a host of dangerous chemicals that rain gardens have no ability to filter. **The statement that the rain gardens “clean stormwater runoff” isn’t factual.** Just one example, fire foam chemicals (polyflouroalkyl substances (PFAS)) run into wetlands, slowly sink into aquifers then travel and destroy drinking water wells over miles. Natural filtration will NOT clean out many carcinogenic and toxic chemicals. Parking lots are primary host to these chemicals. Your statement is an exaggeration and inaccurate.

Missing Geological Information- Page 42 “Given that there are no identified geologic hazard areas...” Puget Sound liquefaction maps indicate the Mall area specifically shows a “**high likelihood of significant liquefaction**” and flooding at the time of a significant earthquake. This mapping and data is missing. Multiple sources: King County Flood Control District, MangoMap.com

Missing City Sewer Comp Plan and Impacts to sewer system- Page 67, “In the absence of a comprehensive plan for the LFP Sewer Department..” Exactly how does the City of Lake Forest Park evaluate impact of a large addition to its sewer system if city staff has never done a Comprehensive Plan of the current sewer system? The EIS requires data regarding current condition of the City’s sewer system and vulnerabilities, and plans to improve the system. **In other words, can the City system handle human waste from 1500 additional toilets? And why isn’t this information included for public review?**

Open Space including private use areas of development- Page 56. Town Center development was proposed to us as primarily a community space development while keeping the “character of our community” and providing additional housing. Private roof top decks and access areas for residents are not open spaces and as I’ve seen in a Bothell new development seldom used by the apartment residents anyway. In reality it should be designated “wasted space”. In the DEIS proposed alternatives City residents are relegated to “in between spaces” such as streets, roof tops and parklets. None of these are “keeping with the character of the surrounding community” Page 2.

Unit numbers are exaggerated – Assurances of square footage of the proposed units by city staff do not allow your unit numbers and indicate your drawings are not accurate.

Dear Lake Forest Park Commissioners,

Our names are Dale and Terri Cote. We live at 17402 44th Ave in Lake Forest Park. Our home is one of many that live along the boarder of our Town Center. Lyon Creek goes through the center of our yard and then alongside the border of the Town Center. We have lived here 26 years. Terri has lived in LFP all of her life.

We recognize that our city has an opportunity to impact the potential re-development of the Town Center. We are not opposed to development – in fact there could be significant improvements that would be a value add to our city. However, we have significant concerns regarding the timeline, density proposed, and the overall DEIS not matching the vision of our city.

This timeline is completely inappropriate - resulting in wild rumors and significant distrust between citizens and our city government. Many believe you have your own agenda and are not interested in what the citizens have brought forward as a vision for LFP, or their comments to date. I was present at the meeting where the DEIS was presented and the citizens there were very upset that you were not present to hear their comments adding to their anger and distrust. We are asking that you separate the zoning for the 300-car garage from the re-zoning of the Town Center. Address the zoning for the garage first. This will allow more appropriate time and a more thoughtful approach to how to best proceed with the overall zoning of the Town Center and provide you time to build trust by listening and responding to comments and concerns. You currently do not have the time to do this correctly.

Dale was a member of the Town Center Task Force in 2005 that resulted in the current zoning regulations. The Task Force did not conclude that the Town Center would be zoned to have 700 units as it is stated in Alternative 1 of the DEIS. Again, many people feel this is an arbitrary number added by you just to increase density. The other problem with Alternative 1 is how it is presented – ‘No Change’. We believe this creates a false choice. No one wants the Town Center to stay exactly how it is, but ‘No Change’ creates that narrative when in fact re-development could happen with current zoning. So that leaves Alternate 2 and Alternative 3 as our (false) choice. We are asking that you present Alternative 1 as ‘Current Zoning’ rather than ‘No Change’.

We have tremendous concerns regarding the height proposed in Alternative 2 and 3. You MUST do a complete light study and the impact to us and our neighbors considering these height regulations. If the result of the study shows that light will not impact our properties, please know that OUR site lines are important. PLEASE consider the setbacks along this side of the property to include a wedding cake approach with any buildings along this side. We do not want to look up to someone’s balcony. The noise also needs to be considered for our homes along this side of the property as it relates to use of the property on the other side of the fence from us and how it may be utilized (playground, service road, etc). We have currently met the Growth Management Act requirements for density. Adding up to 1700 units is a ridiculous amount of density for the Town Center and LFP and does not match with the vision our citizens have provide you. Please consider changes to our Accessory Dwelling Units regulations as a way to increase density. This is a way to spread density outside of the Town Center and still keep the charm and essence of a very unique and beautiful city. 1,700 units in the Town Center would destroy this unique community and cause us to look like Lake City.

We want change. Change that is sensible and matches the uniqueness of our city and surroundings. Please create the time necessary for you to listen, build trust, engage the community, and make thoughtful and creative decisions that will positively impact our city.

Respectfully,

Dale and Terri Cote

(206) 361-5592



STEPHEN BENNETT
PLANNING AND BUILDING DIRECTOR

JAN, 31, 2019

TOWN CENTER REZONING

I HAVE BEEN TO TWO NEIGHBORHOOD MEETINGS IN THE LAST TWO WEEKS CONCERNING THIS PROJECT AND I BELIEVE THE CONSENSUS IS GENERALLY AS FOLLOWS:

1. THE FINAL INPUT PHASE OF THIS PROPOSAL IS BEING RUSHED BY THE CITY. WE BELIEVE THE FINAL EIS SHOULD BE DELAYED AT LEAST 60 DAYS TO GIVE MORE TIME FOR COMMENT BY THOSE MOST AFFECTED BY THE PROJECT.
2. THE GENERAL FEELING IS THAT ANY RESIDENTIAL UNITS IN THE SHOPPING MALL WILL HAVE AN IMMEDIATE NEGATIVE IMPACT ON THE ENTIRE AREA. THIS IS ESPECIALLY TRUE WITH PROPOSED HIGH RISE TOWERS. NO ONE MOVED TO THIS AREA EXPECTING ANY TYPE OF DEVELOPMENT LIKE THIS WHEN THIS HAS BEEN A SHOPPING CENTER FOR MANY DECADES !!!!
3. BECAUSE OF THESE FEELINGS WE BELIEVE THE PRESENT ZONING FOR MIXED USE WITH UP TO 1,000. UNITS SHOULD BE CHANGED IMMEDIATELY BACK TO COMMERCIAL/RETAIL WITH NO RESIDENTIAL PERMITTED. FAILURE TO DO THIS WILL POTENTIALLY CHANGE THE CHARACTER OF THIS ENTIRE AREA WITH MUCH INCREASED TRAFFIC/POLLUTION AND MANY OTHER NEGATIVE IMPACTS.
4. RESIDENTS ARE THOROUGHLY DISGUSTED AND FEEL THE COUNCIL HAS BEEN "HIDING OUT" SINCE NONE OF THEM WERE AT THE JAN. 16th MEETING AND ONE MEMBER ACTUALLY MADE AN APPEARANCE AT THE JAN. 30 MEETING.

THE TOPIC OF "RE-CALL" WAS BROUGHT UP BY SEVERAL RESIDENTS !!!!

REGARDS,



ROBERT DAVIS

(BOB486141@GMAIL.COM)

(206) 362-7617



Peter J. Eglick
eglick@ewlaw.net

February 1, 2019

Transmitted via first-class U.S. mail and email to SBennett@ci.lake-forest-park.wa.us

Steve Bennett, Director
Lake Forest Park Planning and Building Department
17425 Ballinger Way NE
Lake Forest Park, WA 98155

Re: Comments on Town Center Plan DEIS and Pursuant to the GMA

Dear Mr. Bennett:

Glossy, Expensive Failure: As you know I am a citizen of Lake Forest Park (“LFP”, “City”), residing in Sheridan Beach. I and many others have been struggling to keep up with the barrage of publications, plans, meetings and hearings thrown at us recently. This letter comments on the Draft Environmental Impact Statement (“DEIS”) published by the City on January 2, 2019. The content of this letter should also be included as citizen comment in the City’s Growth Management Act (“GMA”) record for the proposal.¹ These comments are informed by my over 40 years of experience with NEPA² and SEPA and as an attorney who has advised clients, including municipalities, on matters pertaining to land use and environmental law.

Based on that experience, the DEIS can only be described as a glossy, expensive failure to satisfy SEPA’s basic requirements. The issuance of this document as suitable for public comment reflects poorly on the City and is a disservice to Lake Forest Park citizens.

¹ This letter also incorporates by reference other critical citizen comments in the record. See Buck v. City of Shoreline, 2012 Wash. App. LEXIS 789 (2012).

² Pub. Util. Dist. No. 1 v. Hearings Bd., 137 Wash. App. 150, 158, 151 P.3d 1067 (2007) (“The National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. §§ 4321-4370f is substantially similar to SEPA; Washington courts may look to federal case law for SEPA interpretation.”).

The DEIS fails to fulfill its mandated function: “An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.” WAC 197-11-400(2). “The EIS process enables government agencies and interested citizens to review and comment on proposed government actions” WAC 197-11-400(4).

The Washington Court of Appeals has explained the importance of full consideration of environmental factors even for nonproject review:

[O]ur courts have recognized that environmental review can be required even when the government has not made a definite proposal for actual development of the property at issue. In *King County v. Washington State Boundary Review Board* (Black Diamond), the court held that the city's annexation decision was subject to SEPA requirements even though there was no definite proposal for actual development of the annexed property, recognizing that “[t]he absence of specific development plans should not be conclusive of whether an adverse environmental impact is likely.” As the court explained:

One of SEPA's purposes is to provide consideration of environmental factors at the earliest possible stage to allow decisions to be based on complete disclosure of environmental consequences. ... Even if adverse environmental effects are discovered later, the inertia generated by the initial government decisions (made without environmental impact statements) may carry the project forward regardless. When government decisions may have such snowballing effect, decisionmakers need to be apprised of the environmental consequences before the project picks up momentum, not after.

Magnolia Neighborhood Planning Council v. City of Seattle, 155 Wash. App. 305, 316-17, 230 P.3d 190 (2010) (footnotes omitted).

However, particularly in light of the above, the Town Center DEIS does not perform its purpose under SEPA. It is neither impartial, nor informative, nor complete as SEPA requires.³

Lack of Disclosure Concerning GMA and Code Amendments: The DEIS suffers from a striking deficiency in its failure to disclose its procedural and legal context.

³ The DEIS also contains careless proofing errors. See, e.g., page 1 (“**Date Draft Issued:** January 2, 2018” [sic]), section 4.1-page 18 (“need for approximately 220 affordable housing based on 2015 analysis”[sic], “these estimates are likely now likely outdated” [sic]). These errors do not affect the merits, but they are suggestive of carelessness and haste attendant to DEIS publication.

For example, DEIS Appendix E “Description of the Proposal” discloses that the proposal before the City is for adoption of a GMA Comprehensive Plan “subarea plan”:

The City of Lake Forest Park proposes to prepare and adopt a Town Center Plan as a subarea plan and supporting amendments to Title 18—Planning and Land Use. ...

The reference to a subarea plan has particular significance under the GMA: “A comprehensive plan may include, where appropriate, subarea plans, each of which is consistent with the comprehensive plan.” RCW 36.70A.080 (2) (emphasis added).

However, the DEIS fails to examine consistency meaningfully, substituting generalities for genuine analysis. Nor does it address, even without regard to the subarea plan context, the basic questions applicable to a potential Comprehensive Plan addition or amendment. For example, the City has published⁴ for mandatory use by its citizens a list of criteria derived from GMA requirements, as reflected in the following excerpt:

A. All amendments to the Comprehensive Plan will be evaluated using the following criteria. Explain how your application is consistent, conflicts with, or relates to these criteria. ***Applications must include a thorough response to the following criteria:***

1. The proposed amendment is supported by or consistent with the goals, policies and objectives of the various elements of the Comprehensive Plan
2. Circumstances related to the proposed amendment and/or the area in which it is located have changed sufficiently since the adoption of the Comprehensive Plan.
3. The assumptions upon which the Comprehensive Plan is based are no longer valid, or new information is available which was not considered since the adoption of the Comprehensive Plan

*

*

*

The DEIS fails to coherently address these questions. Are Town Center Plan Alternatives consistent with the City’s Comprehensive Plan? The DEIS makes several references to the Comprehensive Plan, but provides no information or analysis concerning consistency with its specific provisions.

For example, as several DEIS comments have already pointed out, the Comprehensive Plan adopted by City Council on Jan. 14, 2016, specifies a growth allocation for LFP of 551 housing units, city-wide, for the entire twenty year time period of 2015-2035.⁵ The DEIS glosses over

⁴ <https://www.cityoflfp.com/Search?searchPhrase=comprehensive%20plan> (emphasis in original).

⁵ See LFP Comprehensive Plan at 42 (“Adopted and ratified in 2013, the King County Countywide Planning Policies (CPPs) provide a countywide vision and serve as a framework for each jurisdiction to develop its own

this inconsistency rather than analyzing it and its associated impacts. It fails to address implications of its alternatives vis a vis the Comprehensive Plan. Yet, these alternatives could effectively establish a residential city-within-a-city at Town Center, characterized by tripling of all of the housing units projected for the entire city over two decades. Is the assumption that growth elsewhere in the City has not or will not occur -- or that growth will cumulatively occur at Town Center and elsewhere? And what are the implications and impacts if that occurs?

Another example concerns the following Comprehensive Plan prescription for a “Mixed Use Town Center:”

Development in the town center category shall continue to be pedestrian oriented. A diversity of housing, business, commercial, civic, recreation and employment opportunities that complement the primary commercial use should be encouraged. It is not the intent of the City to mandate or require that housing be included in any development proposals concerning the Town Center, but rather to encourage it as an option.

Comprehensive Plan, Vol. 1 at 21 (emphasis added). The DEIS does not acknowledge this facet of the Comprehensive Plan or address how it squares, if it does, with each of the DEIS alternatives. Such an examination must occur for all relevant Comprehensive Plan provisions.

What amendments are proposed? The DEIS variously refers to Code amendments, adoption of “guidelines”, and the like. But no exemplars are provided, leaving the public without the means to comment. The text of the proposed amendments are apparently known to some in City government and the DEIS consultants. They may even be found somewhere in City materials not included in the DEIS. But in the absence of more specific information in the DEIS, it is impossible for the public to comment knowledgeably on what has been proposed.

Misrepresentation of Vision: For nonproject proposals, “agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC [197-11-060\(3\)](#)).” WAC 197-11-442(2) The DEIS repeatedly states that the City’s objective is to adopt a Town Center Plan that “would integrate the Vision as its foundation...” DEIS Section 3.1 at 19 (emphasis added). But the DEIS distorts and misrepresents the Vision, presenting a top-down consultant and Council version, not the genuine article. As stated in the January 24, 2019 DEIS comment letter submitted by the citizens appointed by the City to originate the Vision:

“[T]he DEIS under review diverges quite significantly from the Vision Document in terms of goals and priorities. We believe that the DEIS does not accurately reflect the wishes and opinions of the hundreds of citizens of Lake Forest Park who contributed to

comprehensive plan. As updated from the CPPs, the Lake Forest Park growth targets are 551 housing units and 244 jobs by 2035.”)

the Vision Document by participating in the community outreach programs which were the original source of the core goals and priorities expressed in the Vision Document.

We are concerned that the following issues in the DEIS represent significant deviations from the Vision Document: ...

What this means is that the DEIS fails in its fundamental purpose. It misrepresents the Vision, and consequently presents a false objective and skewed alternatives analysis. This cannot be cured by corrections in an FEIS. The public is entitled to comment on a DEIS that accurately presents the Vision and within it accurately analyzes alternatives, impacts, and mitigation. Simply acknowledging in an FEIS that the DEIS on which the public was asked to comment was skewed does not cure the subversion of the SEPA process.

Misleading alternatives: The DEIS presentation of alternatives is also skewed in important respects. For example, the “No Action” alternative is described as follows:

Alternative 1—No Action assumes redevelopment would occur in alignment with the current adopted planning and land use provisions applicable to Town Center in the LFPMC. Under current regulations, if bonus heights are applied, a building height of approximately 60 to 66 feet to the base roofline could be developed, typically referred to as 4 over 1 construction. Other buildings with lower heights may also be constructed, and redevelopment would occur incrementally in multiple phases over time.

DEIS Section 4.1 p. 2. However, the LFP Code sets a Town Center height limit as follows:

18.42.060 Building height.

The maximum building height limit in the TC zone is not to exceed 30 feet; except that a mixed-use building including residential units may be constructed to a height of no more than 40 feet. (Ord. 773 § 3, 1999)

There are Code provisions that might in some circumstances allow for more development at the City’s discretion, including through reference to the amorphous 2005 Town Center Guidelines. See, e.g., LFPMC 18.42.140, 150. However, the DEIS presents its Alternative 1 as a baseline, effectively shifting the framework of the discussion from very high density (Alternative 1 at 700

to 1000 residential units⁶) to even higher density (at 1200 residential units⁷) to extremely high density (at 1500 residential units⁸), when the actual undisclosed baseline is considerably more moderate per Code section 18.42.060.

Councilmembers and others in City government have lectured the public that criticism of the DEIS alternatives distortion is born of ignorance about the DEIS process. For example, one such Councilmember justification has been:

The Draft Environmental Impact Statement is not a plan nor does it represent what developers might propose. The state law requires this exercise for us as a council to evaluate the impacts of “no change” from the current code, as well as a more extreme and middle option.

However, this is no response when the City’s DEIS inflates the “no change” scenario – which the state law does not require.

A recent statement by the LFP Planning Director is equally ill-founded. As the City’s SEPA Responsible Official, who is supposed to supervise preparation of the DEIS, he recently chided:

The City is not well served by asking the consultant to analyze the impacts of only a modest amount of development under Alternative 1.”⁹

This is not an innocuous statement. Nor is it correct.¹⁰ Of course a DEIS considers a range of alternatives. But when the objective is clear -- here examining changes that are true to the Vision -- injecting an inflated baseline skews SEPA “no action” alternative review and defeats the public comment and DEIS-to-FEIS progression. If the Planning Director does not favor an honest no action alternative, and would like to also include an (unlikely) “no action” alternative that assumes unrealistic maximization of every hypothetical bonus and benefit under current Code, that can occur. But, deceptive labelling of a steroidal hypothetical alternative as “no action” is a disservice to the public and the process.

It’s not enough to just acknowledge this in an FEIS. That would mean that the public had no opportunity to comment on DEIS analysis of legitimate alternatives consistent with the Vision. In other words, SEPA is not satisfied by circulating a DEIS with palpably false alternatives and

⁶ See, e.g., DEIS sec. 4.3 at 49.

⁷ See, e.g., DEIS sec. 4.3 at 49.

⁸ See, e.g., DEIS sec 4.3 at 50.

⁹ Email from Planning Director Stephen Bennett, January 18, 2018.

¹⁰ Both the Planning Director and the Otak DEIS consultant have refused to explain -- until after the DEIS comment period closes -- the origin of the DEIS’ peculiar “no action” alternative. *Id.* The Planning Director has also refused requests to extend the comment period to allow citizens to better address this and other issues despite his authority to grant such an extension under WAC 197-11-455(7).

then issuing a backfill mea culpa in the FEIS. Such backfilling defeats public participation, fatally impairing the public review and comment opportunity that a competent DEIS provides. The DEIS itself must be reworked and the recirculated for public comment.

Flawed DEIS Traffic Analysis: The DEIS utilizes Synchro software modeling to analyze existing traffic conditions in the area and anticipated traffic impacts. DEIS Section 4.5 at 81. Synchro analysis is relatively simple and is therefore often used, particularly because the cost of Synchro analysis is less than other software methods. Synchro is basically a static tool: volume, channelization and signal timings are input and a number results, but Synchro cannot replicate real world existing conditions in oversaturated situations. When there is not much congestion and when study intersections are relatively isolated, Synchro can be a competent tool. The DEIS does not -- but should -- explain how and why the decision was made to rely on Synchro, which does not capture delay well in closely-spaced situations such as the Town Center study area.¹¹

As a result of its severe limitations, the Synchro model in circumstances present at Town Center can report LOS grades that are entirely out of touch with reality. Some ground-truthing is therefore necessary if Synchro is used. However, the DEIS is silent on whether results obtained with Synchro were checked against real world situations at relevant intersections?¹²

Further, the DEIS touts its use of Synchro with a reduced trip generation profile based on “Mainstreet USA.” DEIS Section 4.5 at 78-79. However, the DEIS text does not disclose what differences, if any, there are between generally accepted ITE Trip Generation analysis and the MainStreet results. In a similar vein, while the DEIS states generally that the values it uses are not the same as but are “consistent with” forecasts using for example the PSRC model, it should but does not provide an actual comparison.¹³

To realistically analyze existing and anticipated traffic conditions in an area such as Town Center, a different model such as VISSIM, more robust and sophisticated, must be used. VISSIM is a micro simulation model that more accurately assesses existing conditions and anticipated impacts when there are closely spaced intersections and oversaturated conditions. VISSIM is a simulation tool: it takes into account every vehicle entering the study area, acceleration, braking,

¹¹ Synchro does not take into account queues spilling from one intersection to another nor does it effectively account for inadequate turn pocket length potentially resulting in spill back onto the mainline.

¹² According to the May 2017 Washington State Department of Transportation (WSDOT) Traffic Analysis Guidebook, “Synchro is not recommended for ... oversaturated conditions.” Even in situations where Synchro is an appropriate tool (which is not the case here), WSDOT still “recommends that SimTraffic be considered for use as an error check/validation tool for a Synchro model. . .” SimTraffic is a “very basic microsimulation model, which is part of the Synchro Studio Package.” There is no indication that SimTraffic was used in preparation of the DEIS.

¹³ The DEIS also acknowledges that in its traffic operations analysis “signal timings and coordination were optimized to maximize the efficiency of the system...” apparently thereby using hypothetical optimistic projections to minimize impacts. DEIS Section 4.5 at 81.

and driver behavior characteristics. While Synchro should not be used for oversaturated conditions because it does not provide an accurate assessment when there are closely spaced intersections and queues¹⁴ spilling back, VISSIM does provide an accurate assessment in such circumstances.

The DEIS actually acknowledges, with regard to queuing in particular, the limitations of the Synchro model it relies upon:

As described above, the traffic operations analysis performed uses isolated intersection analysis, as measured by the Synchro 10 software. This analysis measures queuing for each intersection independently and does not capture how queues may impact adjacent

intersections. Delays from peak period queuing can affect operations along the state routes and on the Town Center site. For example, at SR 522/SR 104, queues up to 1,300 feet in the eastbound direction and 400 feet in the southbound direction were observed, which affect upstream vehicle operations at SR 522/NE 170th Street and SR 104/NE 175th Street respectively. Given this condition, vehicle operations on SR 522 may be more congested at times than model results show in Table 3.5.3.

DEIS Section 3.5 at 76. And the DEIS states, for example, that vehicle operations “may be more congested at times” than it discloses. But the DEIS does not provide a credible explanation of why the City failed to make the effort to obtain more accurate information.¹⁵ The VISSIM model is more labor intensive and expensive to run than the Synchro model, requiring significant data collection and calibration to replicate/simulate the existing conditions. However, this is no excuse on a crucial issue, especially when the City is said to have already spent over

¹⁴ When assessing traffic impacts it is important to know the length of the queue.

¹⁵ At one point, the DEIS shirks queuing analysis saying that when specific projects are proposed -- after a Town Center Plan has long since been adopted -- review “may include additional traffic and queuing analysis.” DEIS Section 4.5 at 94 (emphasis added). This deferral of a key factor in traffic analysis would mask impacts that can and should be disclosed at the nonproject stage. “The SEPA process shall be integrated with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to seek to resolve potential problems.” WAC 197-11-055(1) (emphasis added).

\$600,000.00 on consultants, and consultants to interface with the consultants, and consultants to chat about what other consultants' non-scientific "outreach" has turned up.

The failure to include an analysis based on VISSIM, or another comparably refined and accurate modelling tool and to realistically assess both existing conditions and anticipated traffic at one of the City's most critical locations, is significant. A DEIS (and City Council) more focused on downstream design issues and other matters should instead be drilling down to obtain the data necessary for the fundamental question of traffic functionality.

Town Center Internal Level of Service Ignored: As a result of its disclosure and analytical shortcomings, the DEIS understates level of service at key external intersections. Further, even where significant level of service problems are disclosed, the DEIS glosses over what should be a hard look and discussion of mitigation.

Lack of rigor in the DEIS analysis of external site traffic impacts is matched by failure to take a hard look at internal circulation issues. The DEIS states that all internal Town Center streets "may continue to be privately owned and maintained." DEIS Section 4.5 at 95. It presents a jumble of aspirational what ifs concerning internal circulation such as "so-called "festival streets" and pedestrian and bicycle amenities. But it does not analyze for the public or decision makers¹⁶ obvious issues concerning internal circulation and access from and to Town Center.

One threshold question, left unaddressed, is whether internal streets should be private given their critical connections with the outside world and the City's regulatory authority to require public streets as a condition of development.

The DEIS sidesteps another key question as well: what happens to internal circulation, and egress from Town Center in the PM Peak Hour when vehicles exit the Sound Transit parking garage? The level of service at key external intersections is disclosed to some extent, as noted previously. But what happens internally on the Town Center site itself under the Alternatives? For example, will Town Center choke on its own traffic as queues of cars trying to leave form? And will Town Center still be the town center -- a community focal point -- if cars cannot readily access or egress during peak periods?

The DEIS assumes only 125 PM peak hour trips exiting from the Sound Transit parking garage. DEIS Section 4.5 at 79. However, no justification is presented for this assumption other than a vague reference to "typical transit travel patterns in the Puget Sound region." *Id.* There is no disclosure of those patterns or analysis of whether and how the distinct Town Center situation supposedly aligns with them. Further, the PM peak hour parking garage trip generation estimate

¹⁶ The existence of an internal street system is acknowledged in passing. E.g., DEIS Section 4.5 at 80, 88, and 89. But impacts on internal circulation and access/egress are not analyzed to inform a City decision on adopting a Town Center Plan. DEIS acknowledgement of the issue is limited to just that – bare acknowledgement. See, e.g., DEIS Section 4.5 at 89 ("The eastbound queue exiting the Town Center at NE 175th Street is expected to be longer than in Alternative 1, which would affect operations at internal intersections in the Town Center site").

assumes a 300 car garage. However, the DEIS repeatedly notes that the Sound Transit garage will be for a “minimum of 300 vehicles.” DEIS Section 1.0 at 1; Section 3.1 at 20 (emphasis added). Why has the minimum been treated as a maximum in the DEIS analysis, thereby reducing recognition of the potential impact of garage trips, especially during the PM peak?

If maintenance and enhancement of Town Center as a community focal point is an overarching goal of a Town Center Plan then the issues noted above should have been the subject of real analysis in the DEIS. Their diminution raises the question of what is the actual purpose of the Town Center planning process. Is it to satisfy the current owner’s development, profit, or resale goals? Is it to accommodate Sound Transit? Is it to have Town Center serve regional over municipal purposes? Is it to create a faux “downtown” enclave to satisfy various planning and politician fantasies? Or is it to improve on Town Center as the community’s vital center?

On the Merits: “It became necessary to destroy the town [center] to save it”¹⁷ is emblematic of stubborn government folly. The City is in jeopardy of having this quote become its new motto.

Conclusion: The DEIS should be rewritten and then recirculated for public comment. The Planning Director and the EIS consultant should be given clear written instructions to add required SEPA and GMA information and analysis.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Eglick', written in a cursive style.

Peter J. Eglick

¹⁷ https://en.wikiquote.org/wiki/Vietnam_War#B

Brian L. Johnson

19307 37th Avenue NE
Lake Forest Park WA 98155
(206) 367-2854 / bnj4@comcast.net

Re. Comments on the Town Center DEIS

Dear Mayor Johnson, City Council and Planning Commission Members,

As a member of the Lake Forest Park community for over thirty years, I have to express my dismay and concern at what appears to be another attempt by city officials, in less than a year, to rush through a proposal to greatly increase housing density well above what this community needs or wants, this time in the guise of improving the Lake Forest Park Town Center.

In lieu of writing a long, drawn out letter outlining my own concerns regarding the three options outlined in the current DEIS, I would instead refer you all to Lorraine Bodi's comments in her response emailed to Director Steve Bennett, dated January 30, 2019. Her response points out the inconsistencies, inadequacies of the current DEIS and its disconnect from the values and vision of this community. She makes a valid case for slowing this whole process down and drafting a Revised DEIS more consistent with the current community values and vision, the LFP Comprehensive Plan, and current codes for the Town Center.

I agree with her suggestion to scrap Plans 2 and 3 of the current DEIS and using Plan 1 exclusively, providing three (or more) options for increasing development within that framework from a baseline of what is there now to a maximum build out allowed with current codes, laws and policies.

Finally, again, let's slow this process down. There is no need to rush. It was pointed out during the last Council Committee of the Whole meeting on January 28th that Sound Transit has decided to wait at least until 2022 to even apply for permitting for their parking garage, with 2023 or later being possible as well. So, if this whole planning process for the Town Center redevelopment is tied to Sound Transit's schedule, why the urgency?? If it isn't, again, why the haste??

Lake Forest Park has a thriving and passionate community with a true self awareness as reflected in the Town Center Vision Plan. This community is actively trying to reach out to you, the city officials, to help us realize that vision. As I see it, as a member of the LFP community, it is our responsibility to let you know what it is we would like to have and achieve. It is your responsibility as our elected officials to let us know what we can afford. Once that is established, we work together to achieve what is possible. To do that requires trust, openness, communication, cooperation and compromise. Let's work together and do it right, for the current and future generations.

Sincerely,



Brian L. Johnson

Dear Mayor Johnson, Steve Bennett, members of the City Council and Planning Commission of Lake Forest Park:

We request that the following comments become a part of the public record, in their entirety.

Our names are Bart Shilvock and Randi Sibonga, and we are 25-year members of the Lake Forest Park community who moved here to raise our family. Both of us are deeply invested in our safe, highly-livable community and its natural environment and we've tried to be engaged and supportive civic participants; as such Randi is a current board member of the Stewardship Foundation and Bart is a member of the Mayor's appointed 2018 Vision Task Force. Bart was one of five Task Force member signers on a letter as part of this process that outlined in detail why and where we felt that the DEIS failed to reflect the Vision document, and the citizen involvement that led to its creation.

Our house is located just west of the Town Center (TC), with Lyon Creek running through the middle of our property. Any significant redevelopment of the mall will likely impact our property in myriad ways because of its proximity, but we've anticipated that inevitability and can embrace the City's purported vision of a more vibrant, pedestrian-friendly Center, with greater diversity of shops and restaurants and quick access to transit. Once we read the City's DEIS, however, evidence of thoughtful, responsible and citizen-responsive plans for development never materialized.

What's clear from the DEIS's representation of the three "options" for the TC development is its preference and promotion of highly aggressive code allowances for building heights and density. These standards are grossly out of step with requirements for density under growth management regulations and policies. They are a clear departure from current and previous task force recommendations. They do not reflect clear and consistent input from the community throughout this process.

The DEIS presents citizens with three alternatives that are really false choices. Citizens have to provide input based on a range of alternatives that build on a flawed low range, making valid comparisons impossible. A true low range would be a number within the existing code, that complied with true growth

management targets, community needs and desires, and consistency with what past detailed studies have targeted. All 3 alternatives greatly exceed housing requirements for the entire city of Lake Forest Park for the next 20 years, per King County. In fact, the City adopted standards in 2016 that require 551 units by 2035. What is the basis for this wildly excessive number then, just a few years later? Any number of citizens have asked where the “700” number in Alternative 1 was derived. The standard response has been that the calculation will be explained to us in the comments for the Final EIS. That is not an acceptable answer. At that point, it is too late. What is being hidden and why?

We know that citizens are so perplexed by the City’s lack of explanation that requests for supporting documentation for this calculation are being made out of concern and frustration. As citizens, we are (in numbers that are growing every day) frustrated with a process that seems to make it as difficult as possible to provide meaningful input that our City Council will actively consider. We have been faced with lack of time, limited transparency, open forums held in the woefully inadequate Council chambers (followed by comments from Deputy Mayor who was not present, that it is only 25 or 30 activist citizens that are opposed), cancelled meetings, agendas are not being provided in advance for the meetings that are held, a Council retreat that would have afforded the public an opportunity for additional insight was canceled without explanation, and now we are faced with a stubborn refusal to deviate from a timeline that everyone knows is reckless and unnecessary. Today we learned that the COW meeting on February 4 was cancelled without explanation. We are being closed out of the process.

Because of the lightning speed at which the City seeks their implementation (approximately one month from the end of the public comment period to final approval of code revisions), we are left with more compelling questions than answers about the frame-work the City wants to put in place for the center of our community. The Council would be irresponsible to stick to a plan for the entire site that is built around an old Sound Transit schedule for code decisions on the parking garage – a schedule we were told at the latest COW meeting has been delayed by at least a year. Adequate studies have not been done in areas such as traffic, noise, groundwater, surface water management, parking, canopy, and other environmental issues as have been identified by

the Stewardship Foundation. There is no reason that code revisions for the rest of the site could not be delayed, while moving forward on the parking garage code changes. To push all the Town Center code changes through without: data-driven studies and analyses; time to process and consider substantial citizen input; time to fully consider input from the Planning Commission, calls into question what the agenda is and whether the Council is looking after the best interests of the citizens they were elected to represent, or the developer they seem to want to give as much flexibility to as possible. The consultant has written that under a more normal process, this would take months to do. What makes this process different? Getting ahead of a Sound Transit schedule is a red herring. It cannot be the real reason.

Here are the major reasons why we are troubled by the standards for building height and density as represented in the DEIS:

1. **They do not comport with growth management requirements and policies for LFP or our region:** The King County Countywide Planning Policies set targets for housing units growth for communities in the country. The target for Lake Fake Forest Park of adding 551 units by 2035...are now likely outdated.” (Chapter 4.0, page 18). We have added housing stock since that time, most notably at the southern gateway and yet we are expected to accept that the “likely outdated” target has now jumped by a factor of three to 1500 units or more in a community that had an average annual growth rate of .075% between 2010 and 2016? (Chapter 3, Page 14).?
2. **The City seems to be “bonusing” the developer with higher density, reduced set-backs, uniform/grid construction options and less usable public space with no assurance of enhancements for the public good. We are left to wonder if proposed code allowances for height and the commensurate bloated number of housing units are driven by Merlone Geier’s response to their shareholders more than the City’s response to a long and thorough process of community input.**

3. **Impacts to our natural environment, traffic circulation and services have not been fully studied, nor have mitigating efforts been even minimally explored.**
4. **Citizens' visioning for the development and current code restrictions on height and density are not reflected. The concerns that citizens had for too much height and density was clearly expressed throughout the process by an overwhelming majority of people.**
5. **Clearly expressed was a need for usable open space, building of varied heights, concerns about a canyon affect for neighboring homes, "diversity of outdoor experiences, ability to walk through the town center separated from traffic, consideration of the history of wet conditions and high water table, planting of trees and landscaping throughout the Town Center, "requiring a redevelopment master plan", and other key elements from nearly every goal** None of these have been addressed in a meaningful way in any of the DEIS alternatives. No objective person could look at these options and say that they address citizen input adequately. They also create huge risk for the project, especially with regard to water conditions. A worst-case scenario for Lake Forest Park citizens could result in massive apartments on areas that are buildable with water issues in other areas that are too risky or costly for the developer to mitigate, leaving us with a dense housing development instead of a town center that serves all of Lake Forest Park and neighboring communities.

As neighbors to the mall, we want to emphasize that Policy TC-19-2 of the Town Center Vision document has not been addressed:

"New development should be located and designed to blend harmoniously with the surrounding neighborhoods. Special care should be taken to transition between higher intensity commercial or mixed use buildings adjacent to low-density single-family residences."

No consideration has been given to a “wedding-cake” tiered construction as was documented in Town Center studies of 2005-06 and has been brought up consistently throughout this process. There are not clear definitions of setbacks that would offer some protection, and there has been discussion of a road along the west side of the property. Some shadowing impact has been studied, but the current plans do not ensure sufficient shadowing and noise protection for the existing neighborhood. Further consideration needs to be given to the shadowing impact of 7-story buildings within the site itself, as there is also the importance of usable open space not enveloped by tall, dense buildings.

We strongly believe that putting a full package before the City Council in February of this year is unnecessary and puts the City, and its citizens (taxpayers) and potential risk in a number of areas. This could be addressed by focusing for now on code amendments re: the parking garage only. That would allow the process additional time needed to adequately process and incorporate citizen feedback, and to do the additional studies and analyses necessary to put in place a solid plan for success. To do otherwise at this point incurs risk to the City, to taxpayers, and to the likelihood of a successfully completed project.

Rushing to start and complete the most critical phase in a month on a project that will take twenty years to build, and will define and shape our community for the next fifty years makes absolutely no sense. We must end up with a project that meets the current and future needs of our the citizens and is a reflection of so many who shaped the project and the values we hold in high regard as a community.

Sincerely,

Randi Sibonga

Bart Shilvock

Dear Steve, the Mayor and City Council of Lake Forest Park,

We are writing to express comments on the Town Center Draft Environmental Impact Statement (DEIS). We've been residents of Lake Forest Park for 13 years. We are raising 2 kids here and we use a lot the Town Center/Mall area facilities. We deeply care about how our community looks, what facilities are offered, the schools, the safety and the environment of Lake Forest Park.

We **are concerned** that DEIS **DOES NOT** represent the views of those hundreds of citizens who participated in the visioning process. Even the supposed lowest level of development (Alternative 1) **would allow hundreds more housing** units than what we've heard discussing in the visioning meetings. We participated to these visioning workshops and we are shocked and very sad to see that our comments were **twisted** into this **RECKLESS PROPOSAL**. The participants were mainly happy with the facilities at the Town Center. However, they would like to see improvements if they are **asked to DREAM BIG**. These workshops started with the question: "IF the Town Center is re-developed, what would you like to see?" We were instructed to be crazy, dream big, unleash all our ideas. Naturally, all fantasies and desires were expressed: plazas, green-space, great retail...etc. Nobody said or dreamed to see 1,500 housing added at the town center, not even 700 housing (as stated in Alternative 1).

Sadly, the city/consultants used the citizens' dreams to propose a revision of the city codes and actually make the public space even smaller (see Alternative 2 and 3), less green-space, less retail, less plazas.... This feels **very manipulative** to us, nobody asked for thousands of added houses. The citizens dream for MORE PUBLIC OPEN SPACE, more green space, more places to gather as a community, THIS IS VERY DIFFERENT.

The city/consultants seem to be pretending that citizens are demanding an improved Town Center because they don't like what they have. That's not what happened at those workshops or the truth. This has been driven by ST3. And, the city/consultants see this as an opportunity to realize/push their agenda, to urbanize and increase the population density in the heart of Lake Forest Park. They have used the public opinion expressed in the meetings to move toward exactly what the city/consultants have wanted for a long time. They created the image that they are on the citizens' side and listen to their opinions to make Lake Forest Park better for us and for the future of our kids. We are astounded by how these meetings manipulated people to make comments and suggestions. And we are very sad to see that our tax money for which we work so hard are spent on workshops that have this outcome.

Why is the process So Fast?

- The city is not allowing the citizens adequate time to discuss, consider, organize, and respond to the DEIS. **FIRST, the city should carefully consider how ST3 changes will affect LFP environment and the citizens' safety and after that to plot a vision on how to improve the Town Center to better fit the new needs created**. Assuming this fast speed on the urgency of ST3 is totally unnecessary. Sound Transit is not in any rush to make property acquisitions in the coming months or even in year 2019. Sound Transit can take MGP property for the parking garage using the authority it has and the city can work with Sound Transit to execute that requirement without changes to the city codes. The development of the parking garage should not be linked to any other development of the mall.

Moreover, at the hearing meeting on 1/16/2019, the MGP mall manager said that they have no desire to remodel at this time and that MGP is perfectly happy with how the mall is now.

MAJOR CONCERS:

- **Are all these Alternatives adequate to be proposed on a wet land that raised so many environmental questions at the time when the city mall/town center was initially built/developed? Please look at those reports and to the public comments at that time!!!**

This rushed report is not properly addressing the impacts to the natural environment, air quality, open space, tree canopy, streams...

- **We can't imagine how the sun/natural light can get over/around any open plaza that citizens dreamed about, with these tall buildings being around that small space.** *We ask you where will you create these beautiful public open spaces that you put on the cover of DEIS around so many tall buildings with so many apartments that are presented in Alternative 2 and 3?* How those green areas will survive around those tall concrete buildings? We went to Kenmore and walked around the new apartment building complex across the street from the City Hall. Please visit that new complex; it is a concrete heaven, no green space, no natural light can get in between these buildings. We felt suffocated and without fresh air there. Moreover, those buildings are shorter in height than what you propose in DEIS.
- **How will infrastructure, schools, roads support the traffic of ST3 parking garage with 300 stalls and 1,500 new houses in such a small area?** We are very concerned how fire trucks and police will come out of or get in that dense area in case of an emergency. We are concerned about the space in schools to accommodate extra kids from 1,500 apartments. We don't want to see our kids in portables in schools. There are currently around 2,900 families in the 1 mile radius from LFP Town Center. **You propose to double that density within this 1 mile and expect the infrastructure and environment to support all that?**
- **There will be many public amenities lost under this proposed density.** A public area on top of the ST3 garage is disconnected from the whole mall area. We love the current common area and how this is connected with the library, Third Place Books, restaurants, Ross, Albertsons... We love how the mall looks now. Our kids love the current facilities. **We are definitely against Alternative 2 or 3.**

MAIN CONCLUSION:

We think that the Town Center could be revitalized and redeveloped, with SOME added housing (allowed by the current code) if MGP asks for this. However, the currently proposed alternatives are not what most citizens want. **The Council should not adopt pro-development code changes based on this flawed DEIS.** If MGP wants to do a remodel in connection with ST3 we need first to hear what they plan to do and after that to use the taxpayer money to make public hearings and workshops. So, please city representatives don't push your own agenda by manipulating people views and comments!!!!

Nobody is asking the city for changes to the current code. MGP does not seem to be asking. The citizens didn't rise up and ask for changes, suddenly. **The city is pursuing this unilaterally, and at a reckless pace.**

We respectfully ask the city to separate ST3 garage development from any other changes that might or might not be needed at the Town Center. We urge the city to exercise due diligence when approves the ST3 garage and look to the environmental impact and the safety of our community.

Dear Mayor and city council you live here, too. Bad decisions will affect all of us including you. Please do not act recklessly on the desire to urbanize and increase density within the 1 mile radius around Town Center....

Thank you for your consideration,

Madalina and Adrian Dobra

TO: Steve Bennett, Planning and Building Director
City of Lake Forest Park

FROM: Paul Cronin
Doug Mitchell
Jean Robbins
Bart Shilvock
Julie Wheatley

DATE: Jan. 24 2019

SUBJ: Comments on DEIS for the Town Center Plan

We, the undersigned, would like to provide this formal comment letter on the Draft Environmental Impact Statement for the Town Center Plan, dated Jan. 2, 2019. All of the signers of this letter served on the Mayor's Task Force for the Town Center Vision Document, which was published in May 2018.

First, we would like to reiterate our appreciation for the work of Mandi Roberts and her team at Otak for their work on the Vision Document. We were all pleased with both the process that led to the document and the Vision Document itself.

However, we feel that the DEIS under review diverges quite significantly from the Vision Document in terms of goals and priorities. We believe that the DEIS does not accurately reflect the wishes and opinions of the hundreds of citizens of Lake Forest Park who contributed to the Vision Document by participating in the community outreach programs which were the original source of the core goals and priorities expressed in the Vision Document. This belief was reinforced by the near-unanimous negative response to the content of the DEIS and the accelerated timeline for approval expressed during the January 15, 2019 LFP Public Hearing.

Critical issues in which the DEIS diverges from the Vision Document

We are concerned that the following issues in the DEIS represent significant deviations from the Vision Document:

- **Housing**

The numbers of housing units in all three alternatives in the DEIS (700, 1200, and 1500) are quite surprising to us. There was nothing in the Vision Document that suggested any numbers approaching such high density development, and none of us recall seeing, reading, or hearing anything in any of the public outreach meetings or in the meetings of the Vision Task Force which would have suggested such numbers.

The Vision Document did address housing in the section entitled "Mixed Use Redevelopment", on page 39. The sole stated goal for this section is:

GOAL TC-17. Encourage a pedestrian-friendly mix of commercial, recreational, civic, and residential uses in the Town Center.

Policies stated to achieve this goal included:

POLICY TC-17.1. Adopt development regulations that encourage a variety and mix of housing types for the entire community. Special attention should be paid to seniors, young families, and workforce housing. Expand housing choices and encourage the development of affordable housing options integrated with market rate housing.

POLICY TC-17.3. Create a program of development incentives to encourage the provision of senior living and affordable housing units.

This goal and these policies do not constitute endorsement of development of 1500 housing units. We strongly believe that a proposal that even considers 1200 or 1500 housing units at Town Center is profoundly at odds with both the goals and policies in the Vision Document. We also believe that such a proposal fails to acknowledge the opinions and desires of the citizens who participated in the outreach events which were the basis of the Vision Document.

- **Open Space**

Page 39 of the Vision Document, entitled “Town Center Character” deals with open spaces in the proposed Town Center. For example:

POLICY TC-18.1. The design of infrastructure such as public and private streets, utilities, sidewalks, trails, and open spaces should consider the sequential visual experience upon entering the site and passing through the site.

POLICY TC-18.4. Development should include interconnected parks, plazas, trails, and open spaces throughout the Town Center.

POLICY TC-18.5. Update, expand, and adopt Town Center specific development standards and design guidelines consistent with this vision and that, at a minimum, address the following:

- Creating a network and hierarchy of interconnected open spaces throughout the Town Center.

Examination of Alternatives 2 and 3 in the DEIS reveals nowhere near the prioritization of functional indoor and outdoor open space that is expressed in the Vision Document. Indeed, a look at Figures 2.2 and 2.3 of the DEIS (Chap. 2, pages 16, 17) shows very little open space at all, unless you count driveways and sidewalks, which – we assure the readers of this comment letter – was not the intent of the Vision Document.

- **Transition from High-Density Development to Single Family Residences**

Policy TC-18.5, on Chap. 4, pages 39-40 of the Vision Document, discusses development standards and guidelines which, among other things, include:

Providing for transitions between higher-density commercial and residential uses and low-density established neighborhoods

The impetus for that policy was because of the impact of both shadowing and noise on the surrounding neighborhood. Note that the DEIS makes no reference at all to any noise analysis; we believe that this is a deficiency, and needs to be addressed in the Final EIS.

Please refer to the drawings on Chap. 4, pages 30 through 32 of the DEIS. These clearly show no transition at all (e.g. “wedding cake” tiered construction to address issues of shadowing and noise) between buildings of 6 or 7 stories and the single family residences on 44th Ave. NE, to the west of the project site. This is unacceptable.

- **Native Vegetation**

Page 30 of the Vision Document states this goal:

GOAL TC-8. Incorporate Lyon Creek, scenic views, and other natural features within and adjacent to the site as public amenities and protect them as environmental resources.

Which is to be implemented by, among others, this policy:

POLICY TC-8.1. Development should emphasize the scenic, forested setting of Lake Forest Park, and should protect mature or native vegetation wherever possible.

Although the DEIS does contain this reference to native plants, on Chap. 4, page 160:

Increasing the tree canopy and the use of native plants across the site as part of new landscaping should be encouraged.

It is difficult to see where exactly the tree canopy could be increased in the DEIS drawings showing Alternatives 2 and 3. Those alternatives show almost the entire site being covered with buildings, or roads, or sidewalks. Where would the native tree canopy be located? This is blatant disregard for the desires expressed by the hundreds of citizens who participated in the development of the Vision Document. Alternatives 2 and 3 are not acceptable.

- **Sustainability**

Page 17 of the Vision Document discusses Sustainability. According to public outreach, this means:

- A community that cares about the environment—placing an emphasis on preservation, enhancement, and beautification
- A setting that represents the name of our community “Lake Forest Park”

Some aspects of the “Vision for the Future” in the context of Sustainability are (also from page 17):

- More trees – expand the tree canopy at Town Center
- Native plantings and rain gardens

None of these expressions of the Vision for the Future for sustainability are present in any of the Alternatives in the DEIS. Alternatives 2 and 3, in particular, provide for little or no more tree canopy at Town Center than there already is. There is no mention of rain gardens the DEIS outside of a references to an existing projects on Chap. 3, page 28-29.

Conflict with the 2015 Lake Forest Park Comprehensive Plan

The Comprehensive plan is the “basis for the City’s regulations, and guides future decision-making” (LFP 2015 Comprehensive Plan, page 5). The most recent version of the Comp Plan, which was written in 2015 and adopted by City Council on Jan. 14, 2016, specifies a growth target of 551 housing units, city-wide, over the time period of 2015-2035 (Comp Plan, page 103). The developments proposed in the DEIS specify 700, 1200, and 1500 housing units in Town Center alone for the three Alternatives. Like the Comp Plan, the DEIS is intended to cover a period of up to 20 years (DEIS, Chap. 2, page 1). The numbers in the DEIS and in the Comp Plan are seriously divergent. There is simply no justification given in the DEIS for overriding the housing targets specified in the Comp Plan. The Comp Plan is official City Policy as specified by RCW 36.70A.070. The housing targets in the DEIS are in violation of the 2015 Comprehensive Plan and give citizens a false choice in terms of real low, medium, and high alternatives that align with community needs based on real King County studies, not enhancing a business case for a developer.

Additional Concerns

- 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. Page 4 of the Vision Document states that “Groundwater levels are shallow in some portions of the site (approximately four to twelve feet below the surface)”. This will certainly have a significant impact on what kind of construction would be feasible on the site, particularly if some parking would be built underground (DEIS, Chap. 2 page 9; Chap. 2 page 14). The DEIS should discuss this problem in more detail and it needs to be analyzed before a Final EIS is signed. DEIS Chap. 4, page 42 acknowledges the potential for shallow groundwater, but the entire plan for parking (and perhaps later commercial development) falls apart if groundwater issues are too costly or technically challenging for the developer to mitigate. This is a significant risk that has not been addressed.
- The number of levels (floors) for Alternatives 2 and 3 is not specified anywhere in the DEIS. The DEIS says that Alternative 1 has up to five levels (DEIS Chap. 2 page 7). The heights, in feet, for Alternative 2 and 3 are given on Chap. 2 page 10, but no number of levels is specified for these Alternatives. In the interest of clarity and transparency, the number of levels should be clearly stated for all Alternatives, as well as the maximum height from the floor of the top floor to the top of the structure.
- Assurance was given by Otak at the public hearing on Jan. 16 that traffic studies have shown that none of the Alternatives in the DEIS would have a significant impact on the traffic at the intersection of Routes 104 and 522. The DEIS claims this as well, in Table 4.5.3 (Chap. 4 page 85) and Table 4.5.5 (Chap. 4 page 93). Frankly, these claims strain credibility. For the record, none of the authors of this

comment letter believe these claims. We believe that anyone who has attempted to go north on Bothell Way from anywhere in Town Center at 5:00PM would agree that adding several hundred parking spaces and up to 1500 additional housing units to Town Center would cause traffic to be negatively impacted. The claim of “less traffic congestion on highways and arterials and environmental benefits such as...” (DEIS Chap. 4, page 19) is pure marketing, and not based on analysis or grounding in reality.

- 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 (page 19). Why was this number of units not used as one of the Alternatives in the DEIS? And more importantly, where exactly did the numbers 700, 1200, and 1500 housing units (for Alternatives 1, 2, and 3) come from? The DEIS fails to adequately describe the methodology used derive and justify these numbers. As far as most of the citizens of LFP are concerned, these numbers were pure fabrications. They certainly had no basis in either the Vision Document or the 2005 Town Center study. The DEIS should have an extensive detailed discussion as to how these housing unit numbers were derived.

Recommendations

We make the following recommendations for revising the DEIS.

- The alternatives presented in the DEIS should contain reasonable housing numbers. Certainly the housing numbers should not exceed the housing target in the 2015 Comp Plan (551) without rigorous justification.
- The timeline for the process involved in the EIS and the City code updates resulting from its adoption is currently unreasonably rushed. We are trying to push code changes through in a month for a project the City Council claims will take 15-20 years to develop, and we know will impact our community for 50 years or more. To proceed in this way brings significant risk to realizing the Vision of the community.
- We understand that the Planning Commission has been prevented from providing formal input into the review of the DEIS. This is unreasonable, unwise, unnecessary, and likely something that could be challenged legally. “As citizen representatives, commissioners recommend programs and policies according to needs and values of the community. The Planning Commission is required by law and is governed by state statute and city ordinance.” (from City of LFP website). Nowhere in the state statute or city ordinance does it say they can be left out of the process at the decision of the City Council or Mayor to comply with a tight Sound Transit 3 schedule. The Planning Commission is well qualified to review this document and needs to be a part of the process to provide written comments and to represent the citizens. Indeed, the Vision Document specifies that the Planning Commission was to be included in the discussion and review process (page 44).
- We understand that there is urgency in getting regulations in place to accommodate the coming ST3 parking garage in a way that is acceptable to the community. However, there is no such urgency associated with the redevelopment of the rest of Town Center. The property owner, Merlone Geier, has not expressed any plans to even study redevelopment, at least not publicly. We recommend that the City separate the study of code changes for the ST3 parking garage from all matters related to the

rest of Town Center redevelopment. This would allow for proper analysis and review of an updated DEIS. The public accepts and supports the concept of a parking garage paid for by Sound Transit. The location seems to be identified. Focus on this aspect, take pressure off of yourselves and the consultant, and spend the necessary time to study real alternatives in the level of detail and openness that will help ensure that what will be built represents community needs, interests, and values well into this century.

Thank you for your attention.

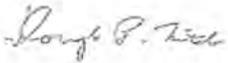


Paul Cronin

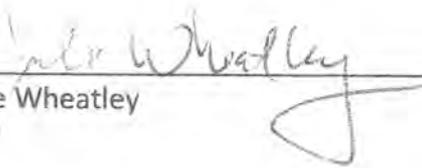


Bart Shilvock

Jean Robbins (As approved by telephone authorization)



Doug Mitchell



Julie Wheatley

Documents referenced in this letter:

- “Draft Environmental Impact Statement for the Town Center Plan”
Issued Jan. 2 2019
http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/full_town_center_plan_deis_january_2nd.pdf
- “Lake Forest Town Center: The Vision”
Issued May 21 2018
http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/vision_document_final_draft.pdf
- “Lake Forest Park 2015 Comprehensive Plan Update”
Adopted Jan. 14 2015
<https://www.cityoffp.com/160/Lake-Forest-Park-Comprehensive-Plan>
- “Sustaining a Livable Lake Forest Park: The Future of Town Center”
Published Oct. 18, 2004
<http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/sustaining-livable-lfp-town-center-report.pdf>

1.0-4: The three scenarios considered do not represent “book ended” scenarios, at least for the lower density alternative. Alternative 1 is stated to be based on an outline of a plan submitted approximately 15 years ago which never received approvals nor was negotiated with a special task force, as the guidelines require. Thus, this scenario is akin to a developer’s wish list, rather than lower book end.

1.0-4: Alternative 1 – No Action is incorrect. According to the 2005 guidelines:

“Step 8: City Council reviews and acts on the Staff recommendation regarding master plan and development agreement. Council would **likely approve a rezone** subject to the terms and conditions of the Development Agreement.” (bolding and fontsize mine)

This indicates that to utilize the 2005 guidelines, a rezone would have to occur. Further, the “likely” indicates that a rezone is not guaranteed. Thus, the action to rezone the Town Center for Alternative 1 is the same action that is required for Alternative 2 and 3. This is not a “no action” scenario. However, there is a simple no action scenario which follows the code:

“18.42.040 Limitations on use.

Every use locating in the TC zone shall be subject to the following further conditions and limitations:

A. Residential uses are not permitted as separate projects; they must be developed in combination with commercial or nonresidential uses as part of a single site development plan. Residential uses may not be developed at a density of greater than seven dwelling units per acre;”

It is important to use a true “no action” scenario. For example, the traffic analysis defines significant impacts relative to the “no action” scenario. Using an “action” scenario, as Alternative 1 is, invalidates the conclusions of the traffic analysis.

2.0-1: “No action” scenario is again inaccurate as significant action consisting of a special task force and city council vote to rezone would be required. 18.42.040 should be used instead.

2.0-1: Action alternatives are not supported by Vision statement. There was no significant community input on density or building heights, much less support for increasing them beyond the 2005 guidelines. Please provide concrete and quantitative information from the Visioning process to support this statement, or remove any increase in height above the 2005 guidelines from consideration.

2.0-1: “Book-ends” is again inaccurate as 18.42.040 provides a much simpler and inarguable lower book end.

2.0-1: An ST3 parking garage should not be assumed in all scenarios. Alternative sites, such as the Chevron Station and Veterinary Hospital, are potential alternatives.

2.0-2: Alt 1 – No Action. The 700 units is not supported by the building sizes drawn in later Figures. GSF is <500,000, insufficient for the 1000sf average unit that the Otak consultant is on record telling the

Planning Commission is the average size. This neither represents a low book-end, nor a no-action scenario, nor a physically plausible plan.

Table 2.1: This table needs to define what a dwelling unit is, including the median size and distribution of sizes. It should also specify the gross square footage of residential space. The table should also include the public open space added in each scenario and labeled in Figures 2.1, 2.2 and 2.3.

2.0-3: Alternative 1 – No action is again incorrect. It requires significant action in the form of a special task force and a city council resolution.

2.0-3: “adoption of the 2018 Vision would not occur” is misleading for two reasons: 1) the majority of the Vision is already contained in the 2005 guidelines and 2) the Vision would be used by the special task force and city council to evaluate and negotiate any agreement under the 2005 guidelines.

2.0-4: Why are only greater numbers of units considered, and not lower numbers of units? This results in a biased alternative. If there is uncertainty in the number of units, and the goal is a lower book end, the lowest number of units must be used.

2.0-5: “did not move forward because of the economic recession” is attributing something which cannot be demonstrated. The proposal did not move forward, period. It was never reviewed by a special task force or the city council. If the recession had been the only factor, this should have been built within the past 5 years as property values and housing demand has exceeded pre-recession levels for approximately 5 years now. Therefore, there is no reason to use this as a lower bookend.

2.0-5: Why are “civic and community uses and spaces ... expanded” in Alternative 2 but not specified in Alternative 1. The Guidelines are crystal clear that they can only be used in exchange for public amenities, which are incredibly similar to those outlined in the Vision statement. This presents a biased proposal.

Figures 2.1, 2.2 and 2.3 use different legends. These need to be consistent between all 3 figures for comparison.

Figure 2.1: The buildings are not large enough to accommodate 700 units of 1000sf, as stated by the consultant to the planning commission. Why is there scenario not self-consistent?

Table 4.3.5 needs a new description as it does not make sense.

Table 4.3.6: Drop the decimal place and take a lesson in significant figures.

4.3-55: “Increases in K-12 student population would occur incrementally over time” – how is this determined? The proposed code and guidelines have no statements about how many units can be built in a given time. It is likely that the population increase would be punctuated and would not increase gradually – it is possible that the site could be redeveloped all at once. For the DEIS assumption to be true, specific limits of new units allowed per unit would need to be put in place.

4.3-55: Please provide the specific information that the school district relayed about capacity. As the parent of a 19-20 Kindergarten, we are being told that there is insufficient space at Brookside Elementary for Kindergarten and our child might be placed elsewhere in the district. This suggests that there is not capacity. The DEIS statement is unsupported, unattributed and unverifiable.

4.3-57: The number of things wrong with the Open Space analysis is staggering. First, private open space should not be included in the calculation of PROST acres per 1000 population. My backyard is not included in the PROST acreage, so a private Town Center roof top garden should not be either. Second, the existing PROST acreage within walking distance of Town Center should be assigned solely to the new Town Center residents. The parks are already used by the city population – in fact, it is clear that our community does not have enough open space and is trying to remedy that. Either the existing PROST acreage needs to be removed from the calculation, or the existing population which utilizes them needs to be added in. Third, “if existing rain gardens and open spaces that are likely to be retained” are being included in the open space calculation, these (and all similar features within the city) need to be added to city-wide PROST acreage used for comparison.

4.3-57: “All scenarios shown in Table 4.3.9 are above the 2 acres per 1000 existing conditions”. This is simply not true. For Alternative 1, there would be 2.5 acres of new public open space (100,000sf for 1000 units at 100sf per unit plus 10,000sf for commercial). With a population of 2400 (2.4 people per unit times 1000 units), this is 1 acre per 1000 people, only half of the existing condition. (The amount of open space per 1000 people for Alternative 2 and 3 will also be 1 acre per 1000 residents because the 100sf per unit assumption is the same and the population per unit assumption is the same).

4.3-57: This table is grossly misleading. Let’s follow the logic in this section: 1) LFP has significantly less park/open space than the national average and is working to change that; 2) let’s add up all the somewhat nearby existing open space; 3) then add up new TC open space with the existing open space, which is already inadequate for our population; and 4) include the existing open space but not the existing population, in the acres per people (Table 4.3.9). This grossly misrepresents the open space per new resident. Only the new open space should be included. Or all of the current population which uses these spaces (i.e. the entire city), should be included. This calculation needs to be consistent and not a bait-and-switch.

4.3-58: “All scenarios ... are above the 2 acres per 1000” does not include the population which already uses these areas. This calculation is simply bogus.

Table 4.3.10: Why does this table add up to more than any of the three alternative scenarios? This creates a bias that all of this is achievable with the updated code even though that is not true even under full development of Alternative 3.

4.3-62: Municipal services analysis is insufficient. What is the additional cost to the city per resident and how will this be covered by city revenue from the new residents? Will costs have to be born by existing residents? What about impact fees?

4.3-63: Fire and emergency access analysis is insufficient. Increased traffic, particularly at afternoon peak when traffic backs up at 170th.

4.3-65: Schools “because growth would be expected to occur incrementally”. What is the assumption based on? Redevelopment would almost certainly occur in bursts, which is highlighted in this very document when Alternative 1 is discussed as a first phase of redevelopment. 1500 people, 10% of our population, could be added at once. This is not incremental growth. Specific caps on annual growth should be implemented if the DEIS will not evaluate the impacts of punctuated growth.

4.3-66: What guarantee is there that the development would be gradual? Without specific provisions in the code, this analysis is not sufficient.

4.4-72: "natural gas to the city of Shoreline". This reveals that the DEIS did not even consider our city, Lake Forest Park. Please actually contact PSE and get something on the record about the availability of service.

4.4-73: Shoreline again.

4.5-88: "transportation impacts of Alternatives 2 and 3 are measured against the transportation conditions of Alternative 1 No Action". This creates a fundamental flaw in the analysis. Alternative 1 is not "no action." It requires appointing a special task force and vote from the City Council to rezone the Town Center. This analysis must use a true "no action" scenario which uses the 18.42.040 and the 7 dwelling units per acre stated therein.

Table 4.5.4 – The impact of choosing a 'significant action' alternative 1 is that the traffic analysis would find that 4 of the 10 intersections are significantly impacted (i.e. increased delay of >5s). I can only use current conditions (Table 4.5.3), but intersections 2,5,6,9 would all be significantly impacted under Alternative 2. An appropriate Alternative 1 must be used for this analysis to be accurate.

Table 4.5.5 – 7 intersections (2,3,5,6,7,8,9) are significantly impacted compared to the current levels. A "no action" Alternative 1 must be used.

4.5-101: The threshold of significance should not be set by Alternative 1, which is not a "no action"

Solar calculations: The solar calculations of shading need to be improved to study interior public spaces. In particular, the impact of East-West orientation has the potential to shade the entire festival street in Alternative 2 even during the summer solstice, making it a rather unappealing outdoor public space. Specific guidelines need to be developed to ensure reasonable solar exposure to all public areas.

January 31, 2019

Dear Mr. Bennett,

The following comments are in response to the DEIS Draft Environmental Impact Statement (DEIS) of the Town Center Plan document under public review. The Alternative 1 plan is for **up to 700 units**, however Figure 2.1 depicting the multi-family use apartments is not sufficient to allow for **700 units of 1,000 sq ft**. At a minimum, a site map and floorplans for the units should be included to clearly show the number of units the project would include. Additionally, your projection of K-12 increase that was estimated does not include 1 child per household. Why not? Are these to be luxury apartments that families with children could not afford? This needs better explanation. Although this document states that "...average household size has been trending down in the region and nationally, and it is typically smaller for multi-family dwellings" Seattle and the Seattle area is unique, experiencing the fastest increase of housing prices in the nation within the past year, so why not use what the average household size of a 1,000 sq ft unit currently holds in Seattle? One of us lived in San Francisco and watched as housing prices went up the number of individuals per household for units or multi-family dwellings went up. Where are these relevant numbers for 1) the footprint needed at Town Center to hold up to 700 units and 2) the average household renting an apartment in Seattle.

The traffic analysis is likely flawed with the conclusion that a 5 sec increase commute time would result from the proposed development as anyone who has driven to Bothell over that past 7 years can attest. How was this traffic analysis conducted? More and more people are commuting from Bothell, Woodenville, etc. and travel through Lake Forest Park. Therefore an increase in congestion from a 700 unit housing project in Lake Forest Park is likely to significantly increase the traffic through Bothell Way NE/Lake City Way NE. What would be required for a plausible estimate of traffic? Traffic congestion would need to be calculated using a plausible scenario in a draft DEIS (i.e. no significant increase in mass transit use is one scenario given the demand for larger SUVs, currently).

The open space mitigation scenarios should not include green roofs as this is not accessible land (fly in?) nor are existing parks in the vicinity of Town Center given that the average width of any open space is at most 75 feet. How would our greenbelt and existing parks absorb an additional 700 people (this is a minimum)? This plan was not thorough enough to make a reasonable determination of the impact.

In summary, the DEIS is not specific enough in Alternative 1, 2, or 3 and errors in calculations of square footage are apparent, therefore there needs to be true transparency in the footprint of the proposals based on the number of occupants (a maximum scenario) and the amount of open space required to protect our already concreted stream at Town Center and under Bothell Way NE. Please present a more accurate depiction of what the development will look like so that residents like ourselves can actually know what Town Center will look like under different plans. As of now the lack of consistency between the tables of calculations and the rendering of the plans is misleading and inaccurate.

Sincerely,

Melanie Paquin & Brad Hanson

14508 Edgewater Lane NE

Lake Forest Park, WA 98155

(206)985-4245

To: Steve Bennett, Planning & Building Director, sbennett@ci.lake-forest-park.wa.us
 From: Tyson Greer
 Date: February 1, 2019
 Re: LFP Town Center DEIS

I appreciate the opportunity to comment on the Draft EIS and wish I had more positive things to say about the document. I concur with and support all the comments submitted by the Lake Forest Park Stewardship Foundation and the LFP Vision Team.

First, I raise and answer two questions, then will limit my additional comments to a few high points.

Summary: Alternatives 2 and 3 are not acceptable. Overall, I find the DEIS engages too often in magical thinking.

1. What is the need for this growth?

- a. The City has met its Growth Management Act targets.

2. What is the need for speed?

- a. The Planning Commission, wherein lies extensive expertise, has not been sufficiently involved; the time frame for public comment is too short given the complexity of the project. ST3 has not confirmed placement of a Park & Ride at the Town Center location, nor is likely to do so in the next six months. I respectfully recommend that the process be slowed, and the Planning Commission be given adequate time to consider alternatives.
- b. Analysis is incomplete. To cite just two examples, perhaps not even the most important ones:
 - i. Pages 55-56, re Open Space: “The actual adopted standards in the future may vary from those referenced in this analysis.... Based on further analysis and public comments, the City may.... Develop a different set of standards that may require **more or less open space.**”
 - ii. Page 68: “A cursory calculation of source water required for consumptive needs was conducted.” In the next 20-30 years, experts generally agree that (a) our NW climate will get drier (b) water will become a scarcer resource. We must not underestimate the impacts of these natural trends, and plan accordingly.

3. Increased population: impacts safety, increases pollution

- a. The city does not have the infrastructure to provide additional services: police, fire, sanitation, schools, city staff, etc.
- b. Adding between 2,520 to 3600 people would definitely impact traffic, unless new residents are equipped with wings. The traffic study is out of touch with reality.
 - i. Already the Northshore Fire vehicles experience traffic backups that slow their response time. Currently 80.5% of LFP residents use their CARS to get to work; 8.6% rely on public transit. It is unrealistic to think that even as few as 1,000 new vehicles would not impact traffic. Count also the increased number of

employees (“up to 800 FTEs”) who will most likely drive to Town Center and need to park.

- ii. It appears that the use of the proposed new parking structure is double-counted: 300 (or 500) spaces for a park and ride, which will likely serve Kenmore residents as well as LFP, and spaces for new Town Center residents to park, plus Sheridan Heights/Beach/etc residents who used to take the 522 bus downtown.
- iii. Increased traffic means more cars, trucks, and buses, idling on the two state highways that bisect our city, and therefore increasing air pollution, which leads to negative health effects.

4. Chapter 3.0 Affected Environment:

- c. **Section 3.1 – Town Center Character and Land Uses:** The “grid-like, urban block pattern of development” is a violation of the character of our city--“the town among the trees” as even members of the Planning Department have described it. There is a disconnect between the stated goals and proposed implementation: Trees planted at intervals along a street do not represent a “natural area” or “habitat.”
- d. **Section 3.2 – Surface Water and Natural Conditions:** The “heat island” effect will negatively affect climate change and increase the threat to salmon. Twenty-five years of LFP StreamKeeper testing documents temperatures in McAleer and Lyon creeks. The removal of trees along the stream portion that parallels Bothell Way is experiencing temperature increases that threaten viability of salmon. The DEIS does not definitely commit to increasing canopy coverage that could reduce this threat.

5. Chapter 4.0, Section 4.1

- e. **“Significant unavoidable adverse impacts”:** This DEIS concludes that although Alt 3 “would be more likely to affect views, aesthetics, and character perceivable to adjacent residents than Alt 2 or Alt 1... with implementation of effective mitigation measures, no significant unavoidable adverse impacts would be anticipated related to land use and character.”
 - i. The author of this section must not have read the rest of the DEIS – e.g. Figure 4.1.5c “uniform height and form” shows massive blocks of buildings. No aesthetic mitigation can screen these blocks.
- f. **Alternatives Analysis, re “natural environment”:**
 - i. While this section acknowledges that the amended planning and land use regs “would help to encourage and incentivize the provision of additional open space, trees, landscaping, pervious pavements, and other low impact development treatments...” – the plans as shown do not carry through this dream. There are no groves of trees, no real open space, creek enhancements, etc.

- ii. The statement: “Increasing the tree canopy and the use of native plants... should be encouraged” is weak and ignores areas of the Tree code that call for prioritizing tree-related land use decisions, such as groves.
- iii. “No significant unavoidable adverse impacts...” is just not factual.

Thank you,

Tyson Greer,

LFP resident
16118 41st avenue ne
Lake Forest Park, WA 98155

January 30, 2019

Steve Bennett
Planning Department
City of Lake Forest Park
17425 Ballinger Way NE
Lake Forest Park, WA 98155

RE: Non-Project Environmental Impact Statement for the Town Center Plan

I am writing to express my concerns regarding the DEIS Town Center proposal. The current Town Center, its design, its scale and spatial quality, separate it from the surrounding community. While the heavy vegetation and undulating topography enhance the surrounding residential environment, the center “sits on” the landscape rather than being part of it.

The proposed alternatives, with building heights of 60 to 85 feet do nothing to address the scale and spatial quality and only exacerbate the differences between the center and the community. They do nothing to better integrate the Town Center into the character of Lake Forest Park. The proposed heights, in each alternative, are simply too high. The potential number of housing units, generated by these building heights, is excessive. If 1500 units were to be built, as is a possibility under alternative 3, it would add to the “out-of-scale” nature of the town center as well as creating pressure on traffic, water and sewer service and drainage in and from the site. A cap of fewer than 600 dwelling units should be included in any agreement to redevelop the center.

Ingress and egress from the Town Center have always been challenging. I do not see that any of the alternatives improve on the current configuration. With the addition of a parking garage and possible new housing units traffic will be an increasing problem.

I understand that four of the five members of the citizens group that worked on the “vision” for the center project have objected to alternatives 1, 2, and 3 as not representing their recommendations. And therefore they do not support any of the alternatives. I support them in their objections.

Apparently, Sound Transit has informed the city that they are not ready to move ahead with the parking facility to be located within the city. With this delay, the opportunity to slow the process of the approval of the DEIS and the EIS should be taken and more time allowed to address concerns voiced by residents of the city. If there is no delay in the ST3 parking decision, the two issues (parking garage and center redevelopment) should be separated and more time given to discuss center redevelopment concerns.

Thank you for considering my comments.

Sincerely,

Ned Lawson
3557 NE 180th Street
Lake Forest Park, WA 98155



Peter J. Eglick
eglick@ewlaw.net

February 1, 2019

Transmitted via first-class U.S. mail and email to SBennett@ci.lake-forest-park.wa.us

Steve Bennett, Director
Lake Forest Park Planning and Building Department
17425 Ballinger Way NE
Lake Forest Park, WA 98155

Re: Comments on Town Center Plan DEIS and Pursuant to the GMA

Dear Mr. Bennett:

Glossy, Expensive Failure: As you know I am a citizen of Lake Forest Park (“LFP”, “City”), residing in Sheridan Beach. I and many others have been struggling to keep up with the barrage of publications, plans, meetings and hearings thrown at us recently. This letter comments on the Draft Environmental Impact Statement (“DEIS”) published by the City on January 2, 2019. The content of this letter should also be included as citizen comment in the City’s Growth Management Act (“GMA”) record for the proposal.¹ These comments are informed by my over 40 years of experience with NEPA² and SEPA and as an attorney who has advised clients, including municipalities, on matters pertaining to land use and environmental law.

Based on that experience, the DEIS can only be described as a glossy, expensive failure to satisfy SEPA’s basic requirements. The issuance of this document as suitable for public comment reflects poorly on the City and is a disservice to Lake Forest Park citizens.

¹ This letter also incorporates by reference other critical citizen comments in the record. See Buck v. City of Shoreline, 2012 Wash. App. LEXIS 789 (2012).

² Pub. Util. Dist. No. 1 v. Hearings Bd., 137 Wash. App. 150, 158, 151 P.3d 1067 (2007) (“The National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. §§ 4321-4370f is substantially similar to SEPA; Washington courts may look to federal case law for SEPA interpretation.”).

The DEIS fails to fulfill its mandated function: “An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.” WAC 197-11-400(2). “The EIS process enables government agencies and interested citizens to review and comment on proposed government actions” WAC 197-11-400(4).

The Washington Court of Appeals has explained the importance of full consideration of environmental factors even for nonproject review:

[O]ur courts have recognized that environmental review can be required even when the government has not made a definite proposal for actual development of the property at issue. In *King County v. Washington State Boundary Review Board* (Black Diamond), the court held that the city's annexation decision was subject to SEPA requirements even though there was no definite proposal for actual development of the annexed property, recognizing that “[t]he absence of specific development plans should not be conclusive of whether an adverse environmental impact is likely.” As the court explained:

One of SEPA's purposes is to provide consideration of environmental factors at the earliest possible stage to allow decisions to be based on complete disclosure of environmental consequences. ... Even if adverse environmental effects are discovered later, the inertia generated by the initial government decisions (made without environmental impact statements) may carry the project forward regardless. When government decisions may have such snowballing effect, decisionmakers need to be apprised of the environmental consequences before the project picks up momentum, not after.

Magnolia Neighborhood Planning Council v. City of Seattle, 155 Wash. App. 305, 316-17, 230 P.3d 190 (2010) (footnotes omitted).

However, particularly in light of the above, the Town Center DEIS does not perform its purpose under SEPA. It is neither impartial, nor informative, nor complete as SEPA requires.³

Lack of Disclosure Concerning GMA and Code Amendments: The DEIS suffers from a striking deficiency in its failure to disclose its procedural and legal context.

³ The DEIS also contains careless proofing errors. See, e.g., page 1 (“**Date Draft Issued:** January 2, 2018” [sic]), section 4.1-page 18 (“need for approximately 220 affordable housing based on 2015 analysis”[sic], “these estimates are likely now likely outdated” [sic]). These errors do not affect the merits, but they are suggestive of carelessness and haste attendant to DEIS publication.

For example, DEIS Appendix E “Description of the Proposal” discloses that the proposal before the City is for adoption of a GMA Comprehensive Plan “subarea plan”:

The City of Lake Forest Park proposes to prepare and adopt a Town Center Plan as a subarea plan and supporting amendments to Title 18—Planning and Land Use. ...

The reference to a subarea plan has particular significance under the GMA: “A comprehensive plan may include, where appropriate, subarea plans, each of which is consistent with the comprehensive plan.” RCW 36.70A.080 (2) (emphasis added).

However, the DEIS fails to examine consistency meaningfully, substituting generalities for genuine analysis. Nor does it address, even without regard to the subarea plan context, the basic questions applicable to a potential Comprehensive Plan addition or amendment. For example, the City has published⁴ for mandatory use by its citizens a list of criteria derived from GMA requirements, as reflected in the following excerpt:

A. All amendments to the Comprehensive Plan will be evaluated using the following criteria. Explain how your application is consistent, conflicts with, or relates to these criteria. ***Applications must include a thorough response to the following criteria:***

1. The proposed amendment is supported by or consistent with the goals, policies and objectives of the various elements of the Comprehensive Plan
2. Circumstances related to the proposed amendment and/or the area in which it is located have changed sufficiently since the adoption of the Comprehensive Plan.
3. The assumptions upon which the Comprehensive Plan is based are no longer valid, or new information is available which was not considered since the adoption of the Comprehensive Plan

*

*

*

The DEIS fails to coherently address these questions. Are Town Center Plan Alternatives consistent with the City’s Comprehensive Plan? The DEIS makes several references to the Comprehensive Plan, but provides no information or analysis concerning consistency with its specific provisions.

For example, as several DEIS comments have already pointed out, the Comprehensive Plan adopted by City Council on Jan. 14, 2016, specifies a growth allocation for LFP of 551 housing units, city-wide, for the entire twenty year time period of 2015-2035.⁵ The DEIS glosses over

⁴ <https://www.cityofflp.com/Search?searchPhrase=comprehensive%20plan> (emphasis in original).

⁵ See LFP Comprehensive Plan at 42 (“Adopted and ratified in 2013, the King County Countywide Planning Policies (CPPs) provide a countywide vision and serve as a framework for each jurisdiction to develop its own

this inconsistency rather than analyzing it and its associated impacts. It fails to address implications of its alternatives vis a vis the Comprehensive Plan. Yet, these alternatives could effectively establish a residential city-within-a-city at Town Center, characterized by tripling of all of the housing units projected for the entire city over two decades. Is the assumption that growth elsewhere in the City has not or will not occur -- or that growth will cumulatively occur at Town Center and elsewhere? And what are the implications and impacts if that occurs?

Another example concerns the following Comprehensive Plan prescription for a “Mixed Use Town Center:”

Development in the town center category shall continue to be pedestrian oriented. A diversity of housing, business, commercial, civic, recreation and employment opportunities that complement the primary commercial use should be encouraged. It is not the intent of the City to mandate or require that housing be included in any development proposals concerning the Town Center, but rather to encourage it as an option.

Comprehensive Plan, Vol. 1 at 21 (emphasis added). The DEIS does not acknowledge this facet of the Comprehensive Plan or address how it squares, if it does, with each of the DEIS alternatives. Such an examination must occur for all relevant Comprehensive Plan provisions.

What amendments are proposed? The DEIS variously refers to Code amendments, adoption of “guidelines”, and the like. But no exemplars are provided, leaving the public without the means to comment. The text of the proposed amendments are apparently known to some in City government and the DEIS consultants. They may even be found somewhere in City materials not included in the DEIS. But in the absence of more specific information in the DEIS, it is impossible for the public to comment knowledgeably on what has been proposed.

Misrepresentation of Vision: For nonproject proposals, “agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC [197-11-060\(3\)](#)).” WAC 197-11-442(2) The DEIS repeatedly states that the City’s objective is to adopt a Town Center Plan that “would integrate the Vision as its foundation...” DEIS Section 3.1 at 19 (emphasis added). But the DEIS distorts and misrepresents the Vision, presenting a top-down consultant and Council version, not the genuine article. As stated in the January 24, 2019 DEIS comment letter submitted by the citizens appointed by the City to originate the Vision:

“[T]he DEIS under review diverges quite significantly from the Vision Document in terms of goals and priorities. We believe that the DEIS does not accurately reflect the wishes and opinions of the hundreds of citizens of Lake Forest Park who contributed to

comprehensive plan. As updated from the CPPs, the Lake Forest Park growth targets are 551 housing units and 244 jobs by 2035.”)

the Vision Document by participating in the community outreach programs which were the original source of the core goals and priorities expressed in the Vision Document.

We are concerned that the following issues in the DEIS represent significant deviations from the Vision Document: ...

What this means is that the DEIS fails in its fundamental purpose. It misrepresents the Vision, and consequently presents a false objective and skewed alternatives analysis. This cannot be cured by corrections in an FEIS. The public is entitled to comment on a DEIS that accurately presents the Vision and within it accurately analyzes alternatives, impacts, and mitigation. Simply acknowledging in an FEIS that the DEIS on which the public was asked to comment was skewed does not cure the subversion of the SEPA process.

Misleading alternatives: The DEIS presentation of alternatives is also skewed in important respects. For example, the “No Action” alternative is described as follows:

Alternative 1—No Action assumes redevelopment would occur in alignment with the current adopted planning and land use provisions applicable to Town Center in the LFPMC. Under current regulations, if bonus heights are applied, a building height of approximately 60 to 66 feet to the base roofline could be developed, typically referred to as 4 over 1 construction. Other buildings with lower heights may also be constructed, and redevelopment would occur incrementally in multiple phases over time.

DEIS Section 4.1 p. 2. However, the LFP Code sets a Town Center height limit as follows:

18.42.060 Building height.

The maximum building height limit in the TC zone is not to exceed 30 feet; except that a mixed-use building including residential units may be constructed to a height of no more than 40 feet. (Ord. 773 § 3, 1999)

There are Code provisions that might in some circumstances allow for more development at the City’s discretion, including through reference to the amorphous 2005 Town Center Guidelines. See, e.g., LFPMC 18.42.140, 150. However, the DEIS presents its Alternative 1 as a baseline, effectively shifting the framework of the discussion from very high density (Alternative 1 at 700

to 1000 residential units⁶) to even higher density (at 1200 residential units⁷) to extremely high density (at 1500 residential units⁸), when the actual undisclosed baseline is considerably more moderate per Code section 18.42.060.

Councilmembers and others in City government have lectured the public that criticism of the DEIS alternatives distortion is born of ignorance about the DEIS process. For example, one such Councilmember justification has been:

The Draft Environmental Impact Statement is not a plan nor does it represent what developers might propose. The state law requires this exercise for us as a council to evaluate the impacts of “no change” from the current code, as well as a more extreme and middle option.

However, this is no response when the City’s DEIS inflates the “no change” scenario – which the state law does not require.

A recent statement by the LFP Planning Director is equally ill-founded. As the City’s SEPA Responsible Official, who is supposed to supervise preparation of the DEIS, he recently chided:

The City is not well served by asking the consultant to analyze the impacts of only a modest amount of development under Alternative 1.”⁹

This is not an innocuous statement. Nor is it correct.¹⁰ Of course a DEIS considers a range of alternatives. But when the objective is clear -- here examining changes that are true to the Vision -- injecting an inflated baseline skews SEPA “no action” alternative review and defeats the public comment and DEIS-to-FEIS progression. If the Planning Director does not favor an honest no action alternative, and would like to also include an (unlikely) “no action” alternative that assumes unrealistic maximization of every hypothetical bonus and benefit under current Code, that can occur. But, deceptive labelling of a steroidal hypothetical alternative as “no action” is a disservice to the public and the process.

It’s not enough to just acknowledge this in an FEIS. That would mean that the public had no opportunity to comment on DEIS analysis of legitimate alternatives consistent with the Vision. In other words, SEPA is not satisfied by circulating a DEIS with palpably false alternatives and

⁶ See, e.g., DEIS sec. 4.3 at 49.

⁷ See, e.g., DEIS sec. 4.3 at 49.

⁸ See, e.g., DEIS sec 4.3 at 50.

⁹ Email from Planning Director Stephen Bennett, January 18, 2018.

¹⁰ Both the Planning Director and the Otak DEIS consultant have refused to explain -- until after the DEIS comment period closes -- the origin of the DEIS’ peculiar “no action” alternative. *Id.* The Planning Director has also refused requests to extend the comment period to allow citizens to better address this and other issues despite his authority to grant such an extension under WAC 197-11-455(7).

then issuing a backfill mea culpa in the FEIS. Such backfilling defeats public participation, fatally impairing the public review and comment opportunity that a competent DEIS provides. The DEIS itself must be reworked and the recirculated for public comment.

Flawed DEIS Traffic Analysis: The DEIS utilizes Synchro software modeling to analyze existing traffic conditions in the area and anticipated traffic impacts. DEIS Section 4.5 at 81. Synchro analysis is relatively simple and is therefore often used, particularly because the cost of Synchro analysis is less than other software methods. Synchro is basically a static tool: volume, channelization and signal timings are input and a number results, but Synchro cannot replicate real world existing conditions in oversaturated situations. When there is not much congestion and when study intersections are relatively isolated, Synchro can be a competent tool. The DEIS does not -- but should -- explain how and why the decision was made to rely on Synchro, which does not capture delay well in closely-spaced situations such as the Town Center study area.¹¹

As a result of its severe limitations, the Synchro model in circumstances present at Town Center can report LOS grades that are entirely out of touch with reality. Some ground-truthing is therefore necessary if Synchro is used. However, the DEIS is silent on whether results obtained with Synchro were checked against real world situations at relevant intersections?¹²

Further, the DEIS touts its use of Synchro with a reduced trip generation profile based on “Mainstreet USA.” DEIS Section 4.5 at 78-79. However, the DEIS text does not disclose what differences, if any, there are between generally accepted ITE Trip Generation analysis and the MainStreet results. In a similar vein, while the DEIS states generally that the values it uses are not the same as but are “consistent with” forecasts using for example the PSRC model, it should but does not provide an actual comparison.¹³

To realistically analyze existing and anticipated traffic conditions in an area such as Town Center, a different model such as VISSIM, more robust and sophisticated, must be used. VISSIM is a micro simulation model that more accurately assesses existing conditions and anticipated impacts when there are closely spaced intersections and oversaturated conditions. VISSIM is a simulation tool: it takes into account every vehicle entering the study area, acceleration, braking,

¹¹ Synchro does not take into account queues spilling from one intersection to another nor does it effectively account for inadequate turn pocket length potentially resulting in spill back onto the mainline.

¹² According to the May 2017 Washington State Department of Transportation (WSDOT) Traffic Analysis Guidebook, “Synchro is not recommended for ... oversaturated conditions.” Even in situations where Synchro is an appropriate tool (which is not the case here), WSDOT still “recommends that SimTraffic be considered for use as an error check/validation tool for a Synchro model. . .” SimTraffic is a “very basic microsimulation model, which is part of the Synchro Studio Package.” There is no indication that SimTraffic was used in preparation of the DEIS.

¹³ The DEIS also acknowledges that in its traffic operations analysis “signal timings and coordination were optimized to maximize the efficiency of the system...” apparently thereby using hypothetical optimistic projections to minimize impacts. DEIS Section 4.5 at 81.

and driver behavior characteristics. While Synchro should not be used for oversaturated conditions because it does not provide an accurate assessment when there are closely spaced intersections and queues¹⁴ spilling back, VISSIM does provide an accurate assessment in such circumstances.

The DEIS actually acknowledges, with regard to queuing in particular, the limitations of the Synchro model it relies upon:

As described above, the traffic operations analysis performed uses isolated intersection analysis, as measured by the Synchro 10 software. This analysis measures queuing for each intersection independently and does not capture how queues may impact adjacent

intersections. Delays from peak period queuing can affect operations along the state routes and on the Town Center site. For example, at SR 522/SR 104, queues up to 1,300 feet in the eastbound direction and 400 feet in the southbound direction were observed, which affect upstream vehicle operations at SR 522/NE 170th Street and SR 104/NE 175th Street respectively. Given this condition, vehicle operations on SR 522 may be more congested at times than model results show in Table 3.5.3.

DEIS Section 3.5 at 76. And the DEIS states, for example, that vehicle operations “may be more congested at times” than it discloses. But the DEIS does not provide a credible explanation of why the City failed to make the effort to obtain more accurate information.¹⁵ The VISSIM model is more labor intensive and expensive to run than the Synchro model, requiring significant data collection and calibration to replicate/simulate the existing conditions. However, this is no excuse on a crucial issue, especially when the City is said to have already spent over

¹⁴ When assessing traffic impacts it is important to know the length of the queue.

¹⁵ At one point, the DEIS shirks queuing analysis saying that when specific projects are proposed -- after a Town Center Plan has long since been adopted -- review “may include additional traffic and queuing analysis.” DEIS Section 4.5 at 94 (emphasis added). This deferral of a key factor in traffic analysis would mask impacts that can and should be disclosed at the nonproject stage. “The SEPA process shall be integrated with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to seek to resolve potential problems.” WAC 197-11-055(1) (emphasis added).

\$600,000.00 on consultants, and consultants to interface with the consultants, and consultants to chat about what other consultants' non-scientific "outreach" has turned up.

The failure to include an analysis based on VISSIM, or another comparably refined and accurate modelling tool and to realistically assess both existing conditions and anticipated traffic at one of the City's most critical locations, is significant. A DEIS (and City Council) more focused on downstream design issues and other matters should instead be drilling down to obtain the data necessary for the fundamental question of traffic functionality.

Town Center Internal Level of Service Ignored: As a result of its disclosure and analytical shortcomings, the DEIS understates level of service at key external intersections. Further, even where significant level of service problems are disclosed, the DEIS glosses over what should be a hard look and discussion of mitigation.

Lack of rigor in the DEIS analysis of external site traffic impacts is matched by failure to take a hard look at internal circulation issues. The DEIS states that all internal Town Center streets "may continue to be privately owned and maintained." DEIS Section 4.5 at 95. It presents a jumble of aspirational what ifs concerning internal circulation such as "so-called "festival streets" and pedestrian and bicycle amenities. But it does not analyze for the public or decision makers¹⁶ obvious issues concerning internal circulation and access from and to Town Center.

One threshold question, left unaddressed, is whether internal streets should be private given their critical connections with the outside world and the City's regulatory authority to require public streets as a condition of development.

The DEIS sidesteps another key question as well: what happens to internal circulation, and egress from Town Center in the PM Peak Hour when vehicles exit the Sound Transit parking garage? The level of service at key external intersections is disclosed to some extent, as noted previously. But what happens internally on the Town Center site itself under the Alternatives? For example, will Town Center choke on its own traffic as queues of cars trying to leave form? And will Town Center still be the town center -- a community focal point -- if cars cannot readily access or egress during peak periods?

The DEIS assumes only 125 PM peak hour trips exiting from the Sound Transit parking garage. DEIS Section 4.5 at 79. However, no justification is presented for this assumption other than a vague reference to "typical transit travel patterns in the Puget Sound region." *Id.* There is no disclosure of those patterns or analysis of whether and how the distinct Town Center situation supposedly aligns with them. Further, the PM peak hour parking garage trip generation estimate

¹⁶ The existence of an internal street system is acknowledged in passing. E.g., DEIS Section 4.5 at 80, 88, and 89. But impacts on internal circulation and access/egress are not analyzed to inform a City decision on adopting a Town Center Plan. DEIS acknowledgement of the issue is limited to just that – bare acknowledgement. See, e.g., DEIS Section 4.5 at 89 ("The eastbound queue exiting the Town Center at NE 175th Street is expected to be longer than in Alternative 1, which would affect operations at internal intersections in the Town Center site").

assumes a 300 car garage. However, the DEIS repeatedly notes that the Sound Transit garage will be for a “minimum of 300 vehicles.” DEIS Section 1.0 at 1; Section 3.1 at 20 (emphasis added). Why has the minimum been treated as a maximum in the DEIS analysis, thereby reducing recognition of the potential impact of garage trips, especially during the PM peak?

If maintenance and enhancement of Town Center as a community focal point is an overarching goal of a Town Center Plan then the issues noted above should have been the subject of real analysis in the DEIS. Their diminution raises the question of what is the actual purpose of the Town Center planning process. Is it to satisfy the current owner’s development, profit, or resale goals? Is it to accommodate Sound Transit? Is it to have Town Center serve regional over municipal purposes? Is it to create a faux “downtown” enclave to satisfy various planning and politician fantasies? Or is it to improve on Town Center as the community’s vital center?

On the Merits: “It became necessary to destroy the town [center] to save it”¹⁷ is emblematic of stubborn government folly. The City is in jeopardy of having this quote become its new motto.

Conclusion: The DEIS should be rewritten and then recirculated for public comment. The Planning Director and the EIS consultant should be given clear written instructions to add required SEPA and GMA information and analysis.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Eglick', written in a cursive style.

Peter J. Eglick

¹⁷ https://en.wikiquote.org/wiki/Vietnam_War#B



Peter J. Eglick
eglick@ewlaw.net

January 29, 2019

Transmitted via email to SBennett@ci.lake-forest-park.wa.us

Steve Bennett, Director
Lake Forest Park Planning and Building Department
Lake Forest Park, WA

Re: WAC 197-11- 455(7) Request for Comment Extension on Town Center DEIS

Dear Mr. Bennett:

As you know I am a citizen of Lake Forest Park, residing in Sheridan Beach. I and many others have been struggling to keep up with the barrage of publications, plans, meetings and hearings thrown at us recently. This letter concerns the Town Center Plan and the DEIS published by the City on January 2, 2019.¹

The DEIS was issued with a comment deadline of February 1, 2019. It has been accompanied by an unusually hasty schedule for review, response to comments, and publication of an FEIS, with a Council decision targeted to occur before the end of February.

The DEIS has already been the subject of considerable consternation in the community. For example, participants in the Town Center Vision process have explained, convincingly, that the DEIS misrepresents the Vision.

There has meanwhile been no credible explanation for the haste with which the Town Center Plan review is being conducted. Further, at its January 29, 2019 Committee of the Whole meeting, the Council was advised of information that Sound Transit will not apply for its proposed Town Center commuter parking garage until 2022 – and perhaps even much later than that.

¹ The DEIS was itself apparently issued in haste and is riddled with proofing errors, including on page 1 where it states: “**Date Draft Issued:** January 2, 2018” [sic].

EGLICK & WHITED PLLC

January 29, 2019

Page 2 of 2

In light of the above and the importance of making sure the Council and its citizens are fully informed concerning the Town Center Plan, this letter is to request pursuant to WAC 197-11-455(7) that you as the City's SEPA Responsible Official extend the DEIS comment deadline from February 1 to February 16.

Please advise.

Sincerely,

A handwritten signature in black ink, appearing to read "PJ Eglick", is centered below the word "Sincerely,".

Peter J. Eglick

b a s i s

DESIGN GROUP

To the Mayor, City Council, and Planning Commission of Lake Forest Park:

Several years ago the city of Lake Forest Park and its citizens went through a lengthy and costly process of studies and community meetings and endless discussion at City Council on the future plans for the Town Center resulting in what is now called Alternative 1. **My first question is why are we bothering with Alternatives 2 and 3 in the first place when I thought we already had a plan?**

I suspect that the new owners (Merlone Geier) weren't happy with that plan and want to redevelop the Town Center with an eye to maximizing their profits at the expense of all the residents of Lake Forest Park. I've read the DEIS and it's pretty clear to me that it was drafted to extol the supposed benefits of Alternatives 2 and 3 and downgrade any benefits of Alternative 1 while dismissing most of the negative effects if not just ignoring them altogether.

Let's take parking for example. Right now there are 952 parking spaces available and the DEIS admits that both lots are often at capacity during the day. It also states that about 80.5% of residents drive to work (meaning they own at least one car). Our current plan mandates **1.5 parking spaces per unit** so if Merlone Geier wants to add 700 units it is my understanding that **they need to provide 1050 parking spaces**. Alternatives 2 and 3 both give us a 300-car garage for commuters (not residents) and either a paltry 100 or 200 commercial spaces. As far as the residents of the 1500 apartments are concerned they get "**Alternative off-street parking ratios and feasibility of shared parking to be considered.**" If 80% of the residents of the 1500 apartments commute by car (**by your own estimates**) that's over **1200 cars that need parking**. And if we already fill up the 952 parking spaces on a regular basis how can you think 100-200 spaces for the commercial tenants will cut it? I can walk to the Town Center from my house and I often do, but if I'm going to buy a few bags of groceries at Albertson's I'm sure as hell going to take my car. I'll bet all of the businesses in Town Center will be reconsidering their leases if you decimate the parking this way. By the way, I was present for several

b a s i s

DESIGN GROUP

of the meetings and read the original documents that resulted in "Alternative 1" and I don't recall 700 apartments being allowed; I thought it was more like 400, and certainly not 1000 with special bonuses applied.

My second question: Since we have already added hundreds of new residences via the Southern Gateway project and are well on our way to satisfy the Growth Management Act, how can the addition of 700, 1000, or (Lord help us) 1500 units possibly be seen as an **"Improvement"** in anyone's quality of life with the sole exception of Merlone Geier?

I also noticed an absence of impact fees to be levied upon Merlone Geier for the changes in zoning and codes that they have obviously asked for. Is this off the table? It seems pretty common elsewhere. You have an opportunity to generate some extra revenue for our city and as far as I can see you're giving away the farm. Merlone Geier bought this property fully aware of the current ordinances and zoning limits and it must have penciled out or they wouldn't have gone through with it. **Question number three: Maybe you'd rather the citizens of LFP pony up the additional money to pay for all the new demands placed upon our water supply, police dept., fire dept., schools, sewer system, etc.?** I noticed that raising the excise tax for real estate sales is in the works. Why not sales tax, too? What other taxes do you have in mind to pay for the increases in services? I see you also plan a potential **50% expansion of City Hall (with 50% more employees and pensions no doubt)**. Ka-ching, ka-ching.

Simply put this "Vision" as you like to characterize it really serves only one purpose: to allow Merlone Geier to do what they damned well please, guarantee a great return on their investment, and to hell with the quality of life for the people who already live here. I really don't understand how anyone on the City Council (who I assume live here) have the gall to foist this kind of sellout on your own neighbors and friends.

Sincerely,

Stephen Flume, resident since 1995

LAKE FOREST PARK TOWN CENTER PLAN
DRAFT EIS COMMENT FORM



RECEIVED
JAN 28 2019
CITY OF LAKE FOREST, WA

Please use this form to comment on the **Non-Project**
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

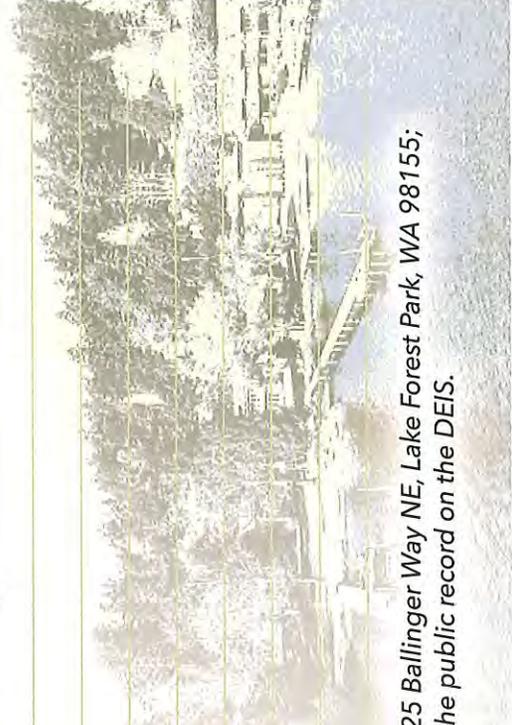
Dear Steve Bennett, I attended the packed meeting on the 16th. I am gravely concerned over what would be unrestrained and irresponsible, runaway development with no consideration of the consequences and the inevitable loss of LFP's distinctive and exceptional character.

I vote no on all the options. Option one is action proposes too many apartments, we understand that more residents bring more automobiles and more use of our water and sewer utilities! Adding a small number of apartments is one thing but option one is too much.

Our area in Sheridan Heights is already in need of traffic calming. Please do not allow this plan to go forward. I feel the Village has spoken very clearly. It was disappointing that one city council member was present.

Law J. Giviss - 16420-38th ave NE, LFP
g.e.l.g@comcast.net

P.S. in Traffic Calming, has anyone suggested making the 39th + 38th Ave NE intersection with Boshell way and Exit Only?



LAKE FOREST PARK TOWN CENTER PLAN
NON-PROJECT EIS SCOPING COMMENT FORM



Please use this form to comment on the range of alternatives and elements proposed for analysis in the Non-Project Environmental Impact Statement (EIS) for the Town Center Plan

Provide input on the elements listed for analysis in the EIS (box below). Which elements are most important to you and why? Are there other elements that should be analyzed?

This community's natural features, the proposed increased housing in LFP Center would affect all of the EIS elements.

- EIS ANALYSIS ELEMENTS:**
- » Town Center Environment and Natural Features
 - » Lyon Creek
 - » Existing Trees and Vegetation
 - » Stormwater runoff
 - » Water quality
 - » Consistency with Adopted Plans/Policies
 - » Planning and Development Land Use Regulations
 - » Transportation and Parking (Traffic Circulation; Access by All Modes)
 - » Public Services (Police, Fire, Schools, Community Services)
 - » Utilities (Water, Sewer, Stormwater Management Facilities, Energy)

What potential impacts are you most concerned about with the possibility of Town Center redevelopment in the future? *The density of people in the center is inconsistent with healthy living. It will affect all of EIS elements. There will be an imbalance in the EIS elements.*

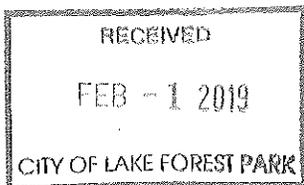
What mitigation measures should be considered to address these potential impacts? *More density of the proposed AT 1, 2, and 3*

Any other comments? *Building department AT 1, 2 or 3 will put stresses on public service department and the environment*

Submit your comments at this public meeting or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155; sbennett@ci.lake-forest-park.wa.us. You may also provide comments online at www.yourlfp.com -check out the Get Involved page and other information about the Town Center Plan and providing your comments on scoping.

Edward E. Goldenberg, Ph.D

5306 N.E. 201st Place
Seattle, WA 98155-1822



Steve Bennett
17425 Ballinger Way NE
Lake Forest Park, Wa 9815



Council Members,

I am a 50 year resident of Lake Forest Park. I was raised here and my husband and I have decided to raise our children here as well. We are avid walkers and bike riders of Lake Forest Park streets. We live here and choose to STAY here because of the wonderful sense of community and knowing our neighbors.

We are writing to ask that you **slow down and reassess your development plans** for the Town Center. We understand that there was a task force of community members who put in a lot of time to let you know what Lake Forest Park residents would like to see at our Town Center. It seems that this has fallen on deaf ears. To add as many dwelling units as Alternative 2 and 3 provides seems like a gross overreach which will negatively impact current residents. As walkers, we have noticed the speeders and the people using 178th as a through way commuting to and from work. With this many residents added, density will be outrageous and we will lose the feel of why people choose to come here and why we have so many 2nd or 3rd generation families choosing to stay here. What other kind of growth does this lead to?

We understand that change does need to happen and growth is imminent, but at this rate??? It is too much. Please slow down and reevaluate this. The elevated traffic and impact on parking at the Town Center and adjacent communities will be too great. I work in Shoreline and have seen, firsthand, the parking problems the residents are having because of the addition of many multiple story dwellings such as Arabella and Polaris. Even if parking is provided, residents don't want to pay for the space and choose to find street parking. I see this as being a big problem if you proceed in the direction of high density housing at LFP Town Center.

Again, **please reexamine the impact on congestion, traffic, safety and parking.**

Thank you for your time.

Tania and Erik Halvorson
17046 35th Ave NE
Lake Forest Park

David Hammond
3015 NE 181st ST
Lake Forest Park, WA 98155

January 31, 2019

Dear Mr. Bennett:

Please note the following comments on the Town Center Plan DEIS, published January 2nd, 2019. I respectfully request that this letter be included in the public record. The DEIS is flawed and insufficient, and should not be used by the Council as the basis for decision-making, for the following reasons:

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 I 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.

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. I 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 tenet 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.**”*

Based on these factors, 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 I 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 on 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. Residents 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 people 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, there appears to be 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.*" 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.

I strongly urge 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,

A handwritten signature in black ink, appearing to read "David A. Hammond". The signature is written in a cursive, flowing style.

David A. Hammond

cc: Mayor Jeff Johnson and City Council



4525 NE 201 Place
Lake Forest Park, WA 98155
January 17, 2019

Steve Bennett, Director
Department of Planning and Building
City of Lake Forest Park City Hall
17425 Ballinger Way NE,
Lake Forest Park, WA 98155

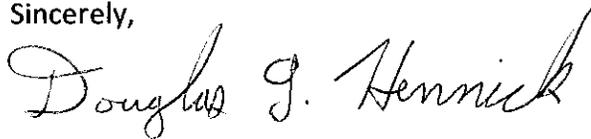
Dear Mr. Bennett:

My comment on the Draft Environmental Impact Statement (DEIS) for the redevelopment of Town Center is that either Alternative 2 or Alternative 3 would cause very substantial environmental impacts to the City, requiring codes that would demand very substantial mitigation. My thoughts on the issue include the following.

1. The "Heat Island Effect" of urban development is mentioned in the draft EIS only once, almost in passing. And yet increasing heat in our city is a major concern, and the concern will get more intense as the climate continues to change in the ways that are presently predictable. City code for this project should require the fullest possible techniques for minimizing heat island effect. The requirement should not merely be to mitigate for increases over the present impacts of the site, but rather to correct for heating on that site above the heating effect that mature forest on that site would cause. That is, redevelopment should be required to correct for past impacts of the site as well as future impacts. Minimum mitigation for this should include well irrigated full green roofs on all buildings, and as much "living wall" as possible on the sides of buildings. This living wall should extend to as high an elevation as possible within engineering constraints. The soil on the green roofs should be an engineered mix at least 12-inches deep, designed to absorb most rain events, and designed to allow cultivation of vegetable crops, berry crops, or grass lawns. Water that cannot be absorbed by the engineered soil mix during rain events, plus other stormwater from the entire site, should be saved in vaults for irrigating the green roofs and living walls during dry spells.
2. Lake Forest Park presently has far less park acreage per resident than most cities that are pleasantly livable, and we have far less than the amount known to be needed for comfortable human wellness. The large number of apartments proposed in the second and third alternatives would greatly increase the problem of too many people for the available park acreage in our city. City code must be changed to require that either of these alternatives would create substantial new park land both onsite and offsite. The onsite new park acreage could be the green roofs described above, if they are open for easy public access. Some of the public use of this "open space" could be strolling paths between commercial vegetable and berry growing operations, or between pea patch

gardens. But offsite park creation is also needed. Our city's present situation, where most residents are denied good access to Lake Washington, is unfair in two ways. These unfairness problems should be corrected during Town Center redevelopment to mitigate for the impacts of the large number of additional city residents housed on site. The first pertinent existing unfairness in this city is caused by requiring all city residents to pay for water pollution control in watersheds that drain to Lake Washington, while only the owners of lakeside property or members of restricted clubs can fully enjoy the benefits of that large pollution control effort. The second existing unfairness is the act of denying most of our children the opportunity to swim in Lake Washington. For mitigating the impacts of the proposed large population increase, City code should be changed to require creation of a major waterfront park where all residents of the city can have easy access to Lake Washington for swimming, wading, relaxing on shore, and launching non-motorized boats by hand. An aquarium displaying all the fish species in Lake Washington and its watershed might be a feasible ancillary feature of this park that would draw additional visitors to our city's commercial district. Presently surveys show that lake access and investments by the City in lakefront property are very important issues for the residents of Lake Forest Park. The addition of thousands more residents hopelessly wishing for lake access, but denied by nearly continuous private ownership of the lakeshore, would be an act of increased unfairness. Our city residents deserve good lake access within walking distance of Town Center, and mitigation for the impacts of Alternative 2 or Alternative 3 should be the method by which that lake access is achieved for all the residents of our city. City code should be changed to facilitate condemnation of property required to create a good lakefront park. Then the City and the developers should form a partnership in which the City purchases land required for a major new park on the waterfront, with money provided by the developers. After acquisition, the City and its volunteer organizations could apply for grants to develop the park.

Sincerely,

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

Douglas G. Hennick

Re: Comments on Town Center Plan Draft Environmental Impact Statement (DEIS)

Greetings Lake Forest Park Council Members,

I am a life-long resident of Lake Forest Park, having lived here since 1992. Despite being an active member of the community, and a frequent visitor to the Town Center, I only recently became aware of the city's intention to redevelop the center. When I read the DEIS, I was shocked by the number of housing units presented in the three development options. I am in favor of multi-use development at Town Center, and the addition of residential units. I believe LFP should share some of the burden in the growth of this region, but not on the scale presented in the DEIS. To be clear, I am fully aware that the development "options" in the DEIS are scenarios created for impact analysis, and are not proposals. Regardless, I'm concerned by the DEIS for the following reasons:

1. It has received near unanimous condemnation from the members of the Town Center VISION task force.
2. In every scenario, the number of housing units far exceeds the targets set in the LFP comprehensive plan.
3. There is no clear argument to explain why the existing building codes need to change at all.

When I was at the January 16th public hearing, there were several members of the Town Center VISION task force who spoke negatively of the scenarios presented in the DEIS. They stated that the number of units in the scenarios were far beyond anything they considered acceptable, and that the DEIS was not representative of the "VISION". Well, if the DEIS was intended to present scenarios that achieve the VISION, why is it receiving harsh criticism from the people who created the VISION? That is very concerning to me.

The LFP comprehensive plan sets a target of 551 new housing units by 2035, to keep pace with growth in this region. That target covers the housing stock of the entire city, not just town center. Why does the DEIS scenarios target 700-1500 units? If the target of an additional 551 units is for the entirety of LFP, why is this proposal trying to put all of that in the Town Center, which is only about 1% of the total area of LFP? I understand the importance of increasing density near the bus line. That's why I support some residential at town center, but the magnitudes presented in this DEIS are way off.

The DEIS does not present a clear argument to explain why we even need to change the city code. It states that the 2005 design guidelines already allow the city to create code exemptions for a developer, in exchange for certain amenities. It then goes on to provide scenarios with 1200 and 1500 new units, which are only feasible via revisions to the code. Well, if the community is overwhelmingly against development of that magnitude, then why do we need to change the code in the first place? We already have the guidelines that give the developer more flexibility. If the argument is "the new code sets precedent for future development", I'll counter with "the act of building any multi-use structures at town center create precedent for future development." If the argument is "the code changes are

required to satisfy the current VISION”, I counter with “ask the members of the VISION task force if they agree with that statement.”

Thank you for taking my comments.

David Gelgisser
16254 37th Ave NE
Lake Forest Park, WA
(206) 718 8627

To: Steve Bennett, LFP Planning Director

Re: DEIS regarding Town Center Zoning and Development

Dear Mr. Bennett:

My objections to the DEIS presented at the hearing January 16, 2019, include the following:

-After learning more about this entire process, it appears that a gigantic “bait and switch” has been fostered upon the citizens of Lake Forest Park. Having been asked to “dream big” if changes were to be made to the mall, the citizens now find those very dreams being used to justify turning Town Center into a *developer’s* dream residential apartment/condo complex, with little thought given to how this would change the very nature of the Town Center as the heart of our city.

-The forced choice between the number of residential units (700, 1200, or 1500) does not reflect the wishes of the community as expressed in previous meetings and confirmed by many who spoke at the hearing. My memory of the earliest discussions about mall renovation, even before the Vision process, was two levels of residential over the current retail, for about 200 units. The numbers 700, 1200, and 1500 have been apparently pulled from some unknown place to represent a model of big, bigger, biggest, as they have no basis in previous plan documents, where the numbers 200, 220, 400, or “two floors of residential over retail” were mentioned.

-The current timeline (comments by Feb. 1 and Council decision on Feb. 20) is too fast for adequate study of and response to the DEIS in a measured and careful manner. A member of the Planning Commission said his group would not even have time to review and respond. Citizens have jobs, families, and other responsibilities. Even for those familiar with Environmental Impact Statements, it requires significant time to carefully read, research, and respond to this draft, and it is that much harder for citizens without that expertise to absorb the document and appendices.

-Is the DEIS being rushed because of the ST3 timeline regarding placement of the 300 car garage? That project has slowed down, and could be a separate discussion of its own.

-The potential heights of 75- and 85-foot buildings are out of proportion to anything currently in Lake Forest Park, or even along Lake City Way approaching LFP. Buildings of this height would literally block out the low arc of the sun through the late fall, winter, and early spring months, and the buildings themselves would put the other buildings in shadows year round. As one speaker at the hearing mentioned, even in urban Seattle by the UW light rail development, buildings are only 4 or 5 stories.

-While ST3 will probably agree to multi-use of their garage during non-commuter hours, suggesting that the structure be used for daily multi-use (open space (roof top garden), library, the Commons) does not make sense. If we do have a commuter garage, it should be saved for bus commuters and thus open up retail parking spaces...the very issue we are dealing with now.

-The potential effect of the increased number of cars on neighborhood access to the mall was not adequately addressed. There's going to be an increase in traffic at all the intersections around the mall, even with just the 300 garage vehicles trying enter and exit in a narrow window of time in the morning and evening; add to that residential vehicles and it will be gridlock that could also affect the ability of police, fire and EMT vehicles to exit from their bases. Even with their own fire signal at Brookside Ave. and Bothell Way, fire equipment may still have a tough time getting out of their own driveway, as that connector street between Brookside and 170th backs up daily, and the fire trucks require a large turn radius.

-Being able to park near retail, without having to use a parking garage or park underground, is a huge benefit to our mall now. It was not clear where parking for the first story retail stores would be.

-The current mall was built on a wetlands amid much controversy. The area is low-lying and receives run off through both McAleer and Lyon Creeks as well as underground springs that run all through Lake Forest Park as water from higher elevations on three sides makes its way to Lake Washington. Page 25 of the DEIS notes that "shallow ground water conditions are known to exist in the Town Center planning area..." as it describes the compacted glacial till of our area. And then it fails to follow up on those concerns. Whispering Willow Park has a boardwalk, not a footpath, for a reason. The entire area is a wetlands.

-The increased density of any of these residential choices, especially 1200 or 1500 new units in our small city of 5202 households, is out of proportion to even what the Growth Management Act might encourage.

-I do not believe our aging infrastructure can support the water and sewer needs for this many new units. A low-flush toilet requires 1.6 gallons of water a day; at 5 flushes per day times 1500 units, that's minimally 12,000 gallons of clean water and then sewage that needs to enter and exit the Town Center per day, or 4,320,000 gallons of clean water in and sewage out per year, *just for toilets*. Average water use per unit was estimated at 150 gallons per day.

I urge that this DEIS be rejected outright and started over, or at least that the process is slowed down to give more citizens a chance to thoroughly study the document. From the comments at the hearing on January 16, 2019, and reviewing the Vision Document myself, I do not think the DEIS adequately reflects the wishes of LFP's citizens, and it certainly does not reflect my own.

Letters submitted by Jay Wheatley, Lorri Bodi, and the five citizens who served on the Mayor's Task Force, as well as others I'm sure you have and will be receiving, expertly point out more specific flaws in this DEIS.

Sincerely,

Barbara Sharkey
16525 Shore Dr. N.E.
Lake Forest Park
2.1.19



Lake Forest Park Water District
4029 N.E. 178th St. Lake Forest Park, WA 98155
P: (206) 365-3211 F: (206)365-3357
WWW.LFPWD.ORG OFFICE@LFPWD.ORG

Commissioners:
Eli Zehner
David A. Hammond
William F. Donahue

January 30, 2019

City of Lake Forest Park
Stephen Bennet, Planning and Building Director
17425 Ballinger Way NE
Lake Forest Park, WA 98155



RE: Agency Comments on Town Center Environmental Impact Statement

Dear Stephen,

Thank you for the opportunity to comment on the Town Center Plan Draft Environmental Impact Statement. The District understands how important the Town Center is to the identity of Lake Forest Park.

Lake Forest Park Water District staff and Mundall Engineering have reviewed the DEIS and as you are probably aware, an engineering review of water impacts from re-zoning was provided to Otak and therefore the City as part of the DEIS preparation. It has been included here for your convenience.

We hope that the City will find the attached comments useful and will consider the alternative language where applicable.

Lake Forest Park Water District looks forward to working with Town Center ownership, the City of Lake Forest Park and Northshore Fire Department to ensure adequate domestic water and fire protection needs for any future development of the Town Center.

Regards,

Alan Kerley

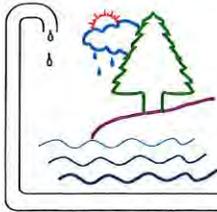
General Manager

Lake Forest Park Water District

Good Water, Naturally

p: 206-365-3211 f: 206-367-3357
a: 4029 NE 178th St., Lake Forest Park, WA 98155
w: www.lfpwd.org e: alan@lfpwd.org

Item	Ref. DEIS	Quote from Town Center Plan Draft Environmental Impact Statement (DEIS)	Comment by Lake Forest Park Water District
1	Chap. 1, P.5	Based on the analysis in this EIS, Lake Forest Park Water District may need to explore interties with other districts to provide adequate service. The feasibility of this and related costs need to be further studied.	LFPWD commissioned an engineering review of water impacts from re-zoning which was provided to Otak as part of the DEIS preparation. There is no indication from this review that "interties with other districts" are required to provide adequate service. The following is suggested alternate language: "Based on the analysis in this EIS, Lake Forest Park Water District may need to consider another physical intertie with SPU if required fire flow is higher than 3,500GPM."
2	Sect. 3.4, P.56	There is a point of supply from the northernmost of the two mains at the northernmost Town Center driveway, which has a static pressure of 75 psi.	Should read: "There is a point of supply from the northernmost of the two mains at the northernmost Town Center driveway, which has a static pressure of 105 psi at the meter. "
3	Sect. 3.4, P.56	The other point of supply for the Town Center is at the intersection of Ballinger Way NE and NE 175th Street. It is supplied by the southernmost 12-inch ductile iron water main along Ballinger Way NE and has a static pressure of 75 psi.	Should read: "The other point of supply for the Town Center is at the intersection of Ballinger Way NE and NE 175th Street. It is supplied by the southernmost 12-inch ductile iron water main along Ballinger Way NE and has a static pressure of 105 psi at the meter. "
4	Sect. 4.4, P.67	In the absence of a comprehensive plan for the Lake Forest Park Sewer Department the comprehensive plan for the nearby Northshore Utility District (NUD) was referenced in this analysis due to its close proximity and similar characteristics of the customers served.	Please provide LFPWD with a copy of the Sewer Comprehensive Plan when completed.
5	Chap. 4 various	Various references to Low Zone water HGL 292 feet	There are a total of six references to HGL Low Zone = 292 feet which were taken from the December 2018 report by Mundall Engineering. Please edit these so HGL Low Zone = 294 feet (NAVD88 datum).



MUNDALL ENGINEERING & CONSULTING

P.O. Box 56
Lytton, B.C. V0K 1Z0
Bus. (800) - 313 - 9705
FAX (250) - 455 - 2276

P.O. Box 799
Sumas, WA 98295
Cellular (360)-319-1285
FAX (360)-599-3394
E-Mail dan@mundall.com

WATER RESOURCES WASTEWATER CIVIL AGRICULTURAL

December 6, 2018

Attn: Alan Kerley, General Manager
Lake Forest Park Water District
4029 NE 178th Street
Lake Forest Park, WA 98155

RE: **Impacts Resulting from Land Use Changes – LFP Town Center Site**

Dear Alan,

Further to email communication and telephone discussions with Lori McFarland and Adam Isaacson of Otak, we conducted a brief review of probable impacts resulting from several growth scenarios that are being considered for the Town Center site.

It is understood that Otak wishes to gain an idea of what type of infrastructure improvements the District might be required to make to accommodate the contemplated changes in land use. After considering their request, and the timeframe for the current study, it is agreed that a detailed examination of these impacts is not attainable presently, so a decision was made to prepare a qualitative assessment of the types of impacts that are expected and defer detailed hydraulic modeling to a later stage. In particular, analysis focused on the largest development "Alt. 3" which includes 1,500 multi-family residential units and some commercial upsizing.

Our review shows that while the contemplated land use scenarios might greatly increase customer count the District infrastructure and water rights are largely capable of supporting the demands. Additional extended period simulation hydraulic modeling is recommended to confirm these assumptions. Serious consideration should be given to water quality impacts and the possible need for another well to offset reliance on McKinnon DW#3 which has nuisance iron levels.

I hope you find this helpful and that Otak can proceed with a better understanding of possible impacts to LFPWD.

Best Regards,

Dan Mundall, MSCE, PE



DATE: / /

01/25/2020

Evaluation of Land Use Possibilities - Town Center Subarea Plan

Impacts to Water Supply

Lake Forest Park Water District

I. Introduction

Otak Consultants are assisting the City of Lake Forest Park in evaluating environmental impacts of various land use alternatives being considered for the Lake Forest Park Town Center. These alternatives may place increased demands on the provisioning of water for domestic and commercial use and also fire suppression needs. Therefore Otak have approached the municipal water provider - Lake Forest Park Water District (LFPWD) and asked for help in identifying the nature of impacts that might be expected with various land use scenarios being contemplated in their study.

“Lake Forest Park Water District strives to provide high quality water, sourced from our local aquifer, at the lowest reasonable cost, while investing in our infrastructure and maintaining the highest level of customer service.”

In particular, the kinds of questions asked are:

- **Adequacy of Water Source & Supply** - Does the District have adequate source & supply water to provide for the land use scenarios?
- **Adequacy of Storage** - Will more water storage be required for peak usage and fire suppression needs?
- **Adequacy of Distribution System** - are new, bigger mains required?
- **Water Quality Impacts** – What impacts might be considered?
- **Other Considerations**



The design and operation of water systems such as LFPWD is primarily regulated by State law through the Washington State Department of Health – Drinking Water (WSDOH). These design standards are delineated in their [Water System Design Manual](#) and other publications. Additionally, LFPWD has adopted design and construction standards in its [Comprehensive Water System Plan 2015](#) that establish more specific requirements unique to the District. Fire requirements for large buildings is estimated by Insurers Services Office (ISO) based on size and construction type and these are usually developed in cooperation with the building architect at a more advanced stage of the project.

II. Adequacy of Water Source and Supply System

LFPWD is unusual among Class A municipal water providers in King County because it supplies nearly all water from its own groundwater sources and it does not normally treat its water. The District has two well fields, McKinnon Creek and Horizon View with a total of 6 deep wells and 8 shallow artesian wells. District water rights were recently pooled with Washington Department of Ecology to allow withdrawal from any of the wells, subject to operational capacity.



There are some variations in water quality between wells. McKinnon Well #3 (and Well #4 which is not connected presently) has high iron content, so water from this source is blended in controlled amounts during periods of peak demand to avoid nuisance water complaints.

The District presently has total groundwater right allocation of 973GPM. Additionally the District recently signed a 50 year agreement with Seattle Public Utilities which provides up to 3,500GPM (duration up to one week) for emergency use from the Tolt pipeline. The current physical capacity of the SPU-Tolt intertie is limited to 2,100GPM but the District is able to construct another intertie under the same agreement if needed. There are special concerns with blending and this water is only available for emergency and fire suppression needs and not for routine domestic demand.

A cursory calculation of source water required for consumptive needs follows, considering the largest development scenario “**Alt 3 – Uniform Form and Height**”:

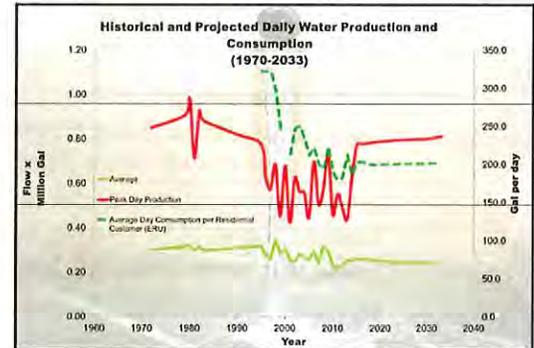
Average Day Demand:

- Assume expected additional 1,500 Multi-Family Dwellings (MFD), ignore non-residential developments as the demands are small compared with residential
- Recorded SFD Average demand is about 200GPD in LFPWD.
- Assume 1MFD = 0.75(ERU) Single Family Dwelling (SFD) based on various sources
- ERU Avg. Day due to Alt 3 = $1500 \times 0.75 = 1,125$ count
- Average demand per MFD unit = $200\text{GPD} \times 0.75 = 150\text{GPD}$ per unit
- Average demand proposed Alt 3 = $150 \times 1500 = 225,000\text{GPD}$
- **Average system demand = $225,000 + 254,000\text{GPD} = 479,000\text{GPD}$ – no issue with source capacity to supply average day for Scenario 3.**
- ERU system count = $1279 + 1,125 = 2,404$

Maximum Day Demand:

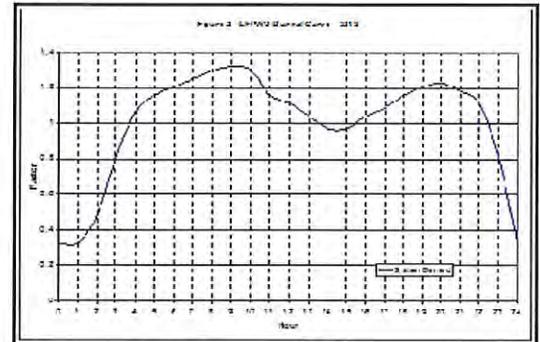
- Assume peaking factor 1.25 for Max Day for MFD (based on Water Research Fdn. 2018)
- Est. Max. Day Demand Alt 3 = $1.25 \times 150 \times 1500 = 281,250\text{GPD}$ (195GPM)
- Current (2020) Max. Day System = 550GPM
- **Scenario Alt 3 Max. Day System = $550+195\text{GPM} = 745\text{GPM} < 973\text{GPM}$ water right.**

Therefore water rights appear adequate to supply Max. Day Demand with the proposed alternative.



Peak Hour Demand:

Peak Hour periods are usually morning and evening. Various ways of estimating Peak Hour for a given system. Generally as the size of the system increases the peaking factor diminishes. In this instance we make a conservative calculation by adding the peak hour demand of Alt. 3 to the existing Peak Hour established in the District's Comprehensive Plan. For a simplified approach we will use a WSDOH formula for peak hour flow. (ref. Eq. 5-3, Table 5-1 of Water System Design Manual 2009)



$$\text{PHD} = (\text{MDD}/1440)[\text{CN} + \text{F}] + 18, \text{ assume } \text{C}=1.6, \text{ F}=225, \text{ MDD}=150\text{GPD}/\text{MFD}, \text{ N}=1500$$

$$\text{PHD}=360\text{GPM} + 784\text{GPM} (\text{current system } 2020) = 1,144\text{GPM}$$

Test for source water rights $1,144\text{GPM} > 973\text{GPM}$ so **additional equalizing storage may be necessary to meet peak hour demands of Alt 3 based on water rights.**
This should be further evaluated by hydraulic modeling.

Fire Demand:

Capacity for fire suppression in commercial structures is the dominant demand in the LFPWD network. Fortunately the District has an emergency intertie agreement with Seattle Public Utilities (SPU) which offers ample capacity to support the District's existing fire suppression need of 3,500GPM for 3 hours. However there are limitations to this capacity:

1. Presently the District is completing design and permitting for a zone pressure reducing valve that will admit this water from the "Horizon View" 550HGL zone to the "Low Zone 292HGL. Without this zone intertie water is restricted from reaching the Low Zone in adequate quantity for commercial fire suppression needs.
2. There are sections of the transmission main which limit the capacity of the intertie to a maximum of 2,100GPM. In consideration of possible future increases in fire capacity the District has identified a location where an additional intertie with the SPU-Tolt system could be constructed to provide greater capacity and reliability. This intertie would be covered as an additional withdrawal point under the existing emergency intertie agreement with Seattle and would require about 1,600 feet of transmission main to the McKinnon Creek wellfield.

III. Adequacy of Storage

The District has a total of 4 reservoirs serving three pressure zones. Most of the distribution storage in the system was constructed in the 1960's. The addition of additional demand will place increased burden on the reservoirs and this should be examined for adequacy to meet various demand scenarios. LFPWD has additional source/supply capacity through an intertie with SPU-Tolt but this is only valid for emergency scenarios such as fire.



1. **Equalizing Storage** is required to accommodate times when peak capacity exceeds source capacity.

Adequacy due to Water Rights limitations:

Without hydraulic modeling we can conservatively estimate equalizing storage required due to water rights using Equation 9-1 in the WSDOH System Design Manual

$$ES = (PHD - Q_s)(150\text{min})$$

Given PHD = 1,144 and water rights capacity = 973GPM

$$ES = (1,144 - 973\text{Gal/min})(150\text{min}) = 25,650\text{Gal}$$

It is likely that the existing "Low Zone" 292 Reservoir may accommodate this need.

However this should be subjected to hydraulic modeling with the actual diurnal curve expected in the LFPWD network (see Diurnal curve graph on previous page).

Adequacy due to water quality considerations:

Water from McKinnon Deep well #3 contains high iron. If this well is blended at more than 25% there will be complaints from customers. Assuming this well is off and the District relied on other wells we have roughly 625GPM available for consumptive use:

$$ES = (1,144 - 625\text{Gal/min})(150\text{min}) = 77,850\text{Gal}$$

Storage may still be adequate in the "Low Zone" 292 reservoir to cover this need although this should be hydraulically modeled to confirm adequacy.

2. **Standby Storage** is required in WSDOH design standards to allow for unexpected limitations in the source & supply system such as power outage or pump failure.
 - WSDOH standby storage Eq. 9-3 in the Design Manual assumes the largest source is out of service and does not include emergency sources:
Standby Storage SB(system with Alt 3) = $2 \times 200 \times 2404 - 1440(600) = 97,600\text{Gal}$ may be adequate with existing system storage although water quality issues must also be considered for this scenario. Note that this would require heavy dependence on McKinnon Well#3 which would be contributing about 1/3 of total supply. The increased iron level would certainly produce customer complaints.

IV. Adequacy of Distribution System

Water distribution networks in the size range of LFPWD are dominated in design by fire protection vs. peak consumptive use. Most of the transmission and distribution network between the Low Zone reservoir and the LFP Towne Center has already been upgraded to 12” main which is adequate for the anticipated future. However there are a few sections which have been identified in the District’s Comprehensive Plan as needing upgrade:



1. Project #SS1 - Low Reservoir to McKinnon Creek transmission main 90 feet will be upgraded in 2019 as part of the District’s ongoing McKinnon Creek Pumphouse project.
2. Project #D10 - Ballinger Way near north entrance to LFP Town Center to 175th Street – 520ft 12” ductile iron is identified in the Comprehensive plan but not funded yet.
3. Project #D5 – 175th Street between Ballinger and 47th Ave. NE 469ft 8” ductile iron. The District is seeking funding for this project at present.

If the proposed project will result in larger demand than 3,500GPM for 3 hours then additional hydraulic modeling should be carried out to assure adequate fire suppression capacity. Obviously this is something that will be dependent on proposed building design.

V. Water Quality Impacts

As identified in other sections of this memo, water quality needs to be considered in placing increased peak demands on the system. Depending on the size of development the District should consider developing a new well under existing water rights to replace the capacity offered by McKinnon DW#3 and DW#4 which does not have the nuisance iron problem otherwise there will likely be increased complaints during peak months of the year with increased reliance on McKinnon DW#3 as a result of the contemplated development.

VI. Other Considerations

1. Presently water is supplied to the LFP Towne Center at the Hydraulic Grade Line (HGL) of the “Low Zone” which is 292feet. This is reduced in pressure by two pressure reducing valve stations owned and operated by the Town Center. Consideration should be given to bypassing these PRV vaults for the proposed development.
2. With increased demands on the District’s Low Zone 292HGL consideration should be made as to the adequacy of the Districts current infrastructure for seismic requirements and standby storage in the event of failure or servicing needs in the Low Zone reservoir.
3. Any of the proposed development scenarios will push the District’s customer count past a threshold customer count for mandated security standards imposed by the Department of Homeland Security.

VII. Summary Conclusions and Recommendations

Impact to the LFPWD water system from the proposed land use scenarios was examined for the maximum impact scenario of 1,500 multi-family units presented in "Alt. 3". While the impact of the other scenarios may differ slightly these differences will be best considered with actual extended period simulation hydraulic modeling of the system.

A brief analysis of the District's system shows that:

1. Water Rights Capacity appears adequate to support the contemplated land uses in conjunction with existing intertie with SPU which provides for capacity for emergency fire suppression needs.
2. Some equalizing storage may be needed in the "Low Zone" HGL292ft although this would be most likely if fire suppression needs increased from the present 3,500GPM for 3hours. The additional demand due to the multi-family dwellings may not trigger the need for additional storage. Hydraulic modeling is needed to confirm this.
3. The existing transmission and distribution network appears to be mostly adequate although a few minor upgrades should be completed including a short section of 12" main on Ballinger in front of the Town Center and a short section of 8" main on 175th opposite the Town Center. One of these is being addressed with the McKinnon Creek pumping station currently under design.
4. Water quality needs to be considered to avoid increased reliance on McKinnon DW#3 and consequent increase in customer complaints.
5. Adequacy of the system should be considered in light of Federal Dept. Homeland Security requirements which are triggered once the District's customer count crosses the DHS threshold of 1,000 customers.

Dan Mundall, P.E.

From: Stephen Mundall <GIS@lfpwd.org>
Sent: Tuesday, November 13, 2018 12:24 PM
To: Alan Kerley; Dan Mundall
Subject: Fwd: Lake Forest Park Town Center
Attachments: Table from EIS Assumptions_Town Center Plan_November 9 2018 REV by Otak.pdf

----- Forwarded Message -----

Subject: Lake Forest Park Town Center
Date: Fri, 9 Nov 2018 21:50:45 +0000
From: Adam Isaacson <Adam.Isaacson@otak.com>
To: Stephen Mundall <GIS@lfpwd.org>

Hey Stephen,

Today I received a summary of the different scenarios for upzoning of the Town Center site that are to be considered for our EIS report. I've included a table in the attachment. You will see 4 scenario columns (Existing, Alt 1 – No Action, Alt 2 – Varied Form and Height, and Alt 3 – Uniform Form and Height). Can you take a look and provide some feedback regarding what the implications of each of the scenarios would be on the LFPWD facilities – capacity, water rights, distribution, planned future improvements, etc.? Your feedback will assist me with the Analysis and Mitigation portion of the EIS. Thank you for your continued support and for your time.

Regards,



Adam Isaacson | Civil Design Engineer, P.E.

11241 Willows Road NE, Suite 200 | Redmond, WA 98052
Direct: 425.739.7955 | Cell: 206.713.5613 | Main: 425.822.4446
www.otak.com

DESCRIPTION OF ALTERNATIVES & ASSUMPTIONS

Town Center Subarea Plan Non-Project EIS

PRELIMINARY DRAFT—November 9, 2018



Land Use	Scenarios			
	Existing	Alt 1 - No Action	Alt 2 – Varied Form and Height	Alt 3 –Uniform Form and Height
Non-Residential (SF)				
Commercial	180,000	154,000	125,000	200,000
Medical/Dental	24,000	0	25,000	50,000
Bank	10,000	10,000	0	0
City Hall	20,000	20,000	32,000***	32,000***
New Civic/Community Space	0	0	20,000	20,000
Windemere Real Est. Office	16,000	16,000	16,000	16,000
Starbucks Coffee	2,500	2,500	2,500	2,500
Arco Gas Station	10 pumps	10 pumps	10 pumps	10 pumps
Lake Forest Bar and Grill	10,000	0	0	0
New Retail/Commercial Space	0	24,000	see above	see above
Housing (Units)				
Multi-family	0	Up to 700	Up to 1,200	Up to 1,500
Parking (Spaces)				
Town Center Commercial/Office, City Hall, and Other Owners	952	-93* -336** +64 for retail on street and off street NET = 587 commercial/office demand @ 4/1000 GSF=906 would need +319 spaces in structure or surface	280 on street/surface 460 below grade/structured commercial/office demand @ 4/1000 GSF=842 740 above+100 below	360 on street/surface 600 below grade/structured commercial/office demand @ 4/1000 GSF=1,154 960 above +200 below
Sound Transit Park and Ride Structure/Shared Structure	0	+300 Total = 300	+300 (shared) +100 retail/ City use Total = 400	+300 (shared) +200 retail/ City use Total = 500
Parking for New MF Housing Units (assumes a 1.05/unit ratio slightly above King County right sized parking model calculations); these would be located below grade or at grade in structure; also could be some surface				

* Displaced by new parking structure some to the south and all to the north of existing medical office building

** Displaced by new MF housing/retail – all in the northern area of Town Center site

*** Assumes 12,000 GSF expansion of City Hall; two levels at approx. 6,000 GSF each; assumes additional civic/community space which could be frontage to parking structure of 20,000 GSF and/or combination thereof

Lisa Pedigo
18464 40th Place NE
Lake Forest Park, WA 98155
206 261-6466
lpedigo@comcast.net
01Feb19

Steve Bennett
Director, Building and Planning Department
City of Lake Forest Park
17425 Ballinger Way NE
Lake Forest Park, WA 98155
Submitted via Email: SBennett@ci.lake-forest-park.wa.us

Mr. Bennett,

The purpose of this letter is to provide public comment/questions regarding the DEIS for Lake Forest Park Town Center Plan.

Why was the period of comment for this DEIS restricted to January 2019? This does not seem to be an adequate period for comments. Why spend a year getting community input and then rush the comments period to less than a month? If this is the road map to begin a potential 15 to 20-year redevelopment process, why is the city rushing this project? Could code revisions for ST3 implementation be fast tracked and the rest of the Town Center code changes occur at a pace that allows greater citizen review and input?

How were the site housing densities determined for the alternatives? My understanding is that LFP requirements to conform to the growth management plan were for 551 additional units to be met by the year 2035. Alternative 1 starts at 700 units and Alternative 2 and 3 are scoped for even higher housing densities. This would seem to favor developers needs without specific requirements for them to comply with the citizen feedback from the visioning process. Alternative 3 grids the property and creates little open community space. It would become a canyon like atmosphere that is not consistent with resident visioning requests or community character.

How are the goals and policies published in the vision document reflected in the alternatives presented in the DEIS? I realize these are hypothetical scenarios presented in the draft however this DEIS seems to suggest that Alternatives 2 and 3 are the only likely path to achieve the amenities that residents desire. I wonder if this is a fair presentation of the three potential choices. There was little discussion about Alternative 1 in the DEIS.

Impacts to traffic.

The addition of the ST3 garage in combination with high housing densities are not adequately addressed in the DEIS. According to Table 4.5.2 *PM Peak Hour Vehicle Trips Generated by Alternatives* the difference in total vehicle trips from existing total trips is only 185 for Alternative 1, 235 for Alternative 2 and 720 for Alternative 3. Is it realistic to believe that adding 700, 1200 or 1,500 housing units would create such small increases in total trips at peak hours? What is the margin of error for these predictions? Are the models used to generate these numbers appropriate? Are the inputs and assumptions used to generate the estimates correct and accurate? How will parking and cut-through traffic in the surrounding neighborhood be addressed?

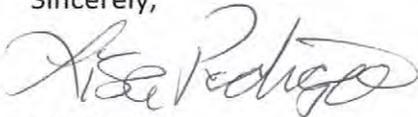
Water quality impacts

I am concerned that there will be damaging effects to Lyon Creek unless adequate buffering and stormwater retention are required and enforced. How will the progress made with the flood mitigation on the creek be protected and strengthened? Pressure on salmon stocks will only increase with higher density and accelerating climate change. We can not afford to make mistakes conserving this resource.

Town Center Future

I am not opposed to redevelopment of the Town Center. I believe the right kind of development would enhance our city and solve some of the problems of aging in place, affordable housing while maintaining the qualities residents hold dear. This is the center of our community, we have no alternate combination commercial and community space within our boundaries. Because of its importance, I urge you to carefully consider revising this DEIS. Please listen to the voice of the community when considering code changes related to this development.

Sincerely,



Lisa Pedigo

cc Mayor Johnson and City Council

January 24, 2019

STEPHEN BENNETT, Director
LFP Planning & Building Department

SUBJECT: Comments on the DEIS

Dear Sir:

My comments to you are as a long time resident of LFP. We are located on Ballinger Way directly across from the Town Center, have been here since 1970 and have seen many changes, mostly good.

We enjoy the convenience of banking, doctors, groceries, drug store, hardware and others including the Commons. Most times we walk to the center but many trips require a car. Some stops are made both coming and going to places outside the area. However, most other people in the community need transportation to access the center.

The apparent future plan is to “**transform Town Center from an automobile-oriented place**” by replacing parking (952 spaces) with buildings. As in most multi-residential buildings, underground parking will likely be reserved for tenants. The parking garage alternate 1 shows no parking except commuter: alternate 2 shows 100 spaces and alternate 3 shows 200 spaces for city and retail use. The City presently requires 45 spaces and it can be assumed that employees at the center will use the rest. As I read the projected impacts of the DEIS it becomes clear that the long term future of the center rest with the actions taken by MGP Investment Co and will ultimately be for the convenience of onsite tenants and not for the community as a whole.

There is one area of greater concern that the DEIS does not adequately address and that is the impact to 905 households connected to the LFP Water District. In Chapter 4.0 Section 4.4 Page 68 it states “**A detailed examination of the types of impacts to LFPWD infrastructure is not presently attainable**”. How can you accept an EIS that says projected impacts are not attainable??? There is also the issue of the DHS requirements. At present LFPWD’s 905 customers fall barely short of the DHS threshold of 1000 to trigger compliance with DHS requirements regarding adequacy of the system. The DEIS references an outside consultant for preparation but no apparent input regarding future impacts from our Water District on these issues.

As customers of the LFPWD we enjoy chemical free artesian water and we must object if conditions requiring changes are to include blending from outside sources. Since over 80% of LFP is presently served by outside water service it stand that if developers are to add 700 -1500 households then the City should require them to furnish water from outside sources as opined in Chapter 4,0 Section 4.4 page 74.

Sincerely,

John & Lynn McGinnis
17544 Ballinger Way NE
Lake Forest Park, WA 98155

jhmcginnis@msn.com

31 January 2019

Phillippa M Kassover
Council Member
City of Lake Forest Park

Subject: Draft Environmental Impact Statement

Dear Council Members,

Thank you for responding to my concerns re: the DEIS. However, after meeting with my neighbors and discussing their concerns it has become apparent that the citizens of LFP need more time to fully review and understand the impacts of this DEIS and the effects it will have on the center over the next several decades.

Since Sound Transit has delayed the parking garage issue for at least a year or more it would behoove the council to not rush this process. If there truly is a need to rush this through without a complete review you must make it known to the citizens.

Several of my neighbors, who have years of experience in preparing and evaluating Environment Impact Statements, have expressed concerns that it is misleading regarding impacts and proposed features. For example, it completely ignores the LFP Comprehensive Plan for growth targets. It triples the plan for the entire city and places it just in the town center.

These changes to the center are too important to rush through and will have an effect for decades to come. We request that you extend the comment time and keep in mind the Vision Framework Document and the Comprehensive Plan.

Sincerely,

John McGinnis
17544 Ballinger Way NE
Lake Forest Park

jhmcginnis@msn.com



STEPHEN BENNETT, Director
LFP Planning & Building Department

SUBJECT: Comments on the DEIS

Dear Sir:

My comments to you are as a long time resident of LFP. We are located on Ballinger Way directly across from the Town Center, have been here since 1970 and have seen many changes, mostly good.

We enjoy the convenience of banking, doctors, groceries, drug store, hardware and others including the Commons. Most times we walk to the center but many trips require a car. Some stops are made both coming and going to places outside the area. However, most other people in the community need transportation to access the center.

The apparent future plan is to “**transform Town Center from an automobile-oriented place**” by replacing parking (952 spaces) with buildings. As in most multi-residential buildings, underground parking will likely be reserved for tenants. The parking garage alternate 1 shows no parking except commuter; alternate 2 shows 100 spaces and alternate 3 shows 200 spaces for city and retail use. The City presently requires 45 spaces and it can be assumed that employees at the center will use the rest. As I read the projected impacts of the DEIS it becomes clear that the long term future of the center rest with the actions taken by MGP Investment Co and will ultimately be for the convenience of onsite tenants and not for the community as a whole.

There is one area of greater concern that the DEIS does not adequately address and that is the impact to 905 households connected to the LFP Water District. In Chapter 4.0 Section 4.4 Page 68 it states “**A detailed examination of the types of impacts to LFPWD infrastructure is not presently attainable**”. How can you accept an EIS that says projected impacts are not attainable??? There is also the issue of the DHS requirements. At present LFPWD’s 905 customers fall barely short of the DHS threshold of 1000 to trigger compliance with DHS requirements regarding adequacy of the system. The DEIS references an outside consultant for preparation but no apparent input regarding future impacts from our Water District on these issues.

As customers of the LFPWD we enjoy chemical free artesian water and we must object if conditions requiring changes are to include blending from outside sources. Since over 80% of LFP is presently served by outside water service it stand that if developers are to add 700 -1500 households then the City should require them to furnish water from outside sources as opined in Chapter 4,0 Section 4.4 page 74.

Sincerely,

A handwritten signature in cursive script, appearing to read "John & Lynn McGinnis".

John & Lynn McGinnis
17544 Ballinger Way NE
Lake Forest Park, WA 98155

jhmcginnis@msn.com

January 16, 2019

Councilmember Phillippa Kassover
Lake Forest Park Hall
17425 Ballinger Way NE
Lake Forest Park, WA 98155

Dear Councilmember Kassover,

I am writing on behalf of myself and my wife, Marilyn McGuire. Marilyn and I moved to Lake Forest Park in 1998 for three reasons: (1) to be near the city, yet in a distinctly non-urban environment; (2) to live in a forest with the presence of water and wildlife; and (3) to have a gathering place nearby that held the promise of a vibrant community center.

The Lake Forest Town Center is a development project gone wrong that the City and the community have made the very best of, in spite of having little or no control. It was awkwardly settled on a wetland and in a bottle neck that was destined to be a hot mess of issues as the region became more densely populated.

We participated in the 2005 re-visioning of the Town Center. We had come to appreciate the size and relative intimacy of what we can claim as the center of our community. It has the scale of a small town, and holds the promise of a unique community center. Back in 2005, the community imagined how much better it could be. Sadly, that vision was still born.

Now we are at it again, but this time in the eye of a hurricane with the converging interests of the City, Merlone Geier, Sound Transit and Lake Forest Park residents. There is much that we risk in this headlong rush to make the most consequential decisions that our community has ever faced. And we can feel the palpable push of money in the process.

In the flood of the issues that spill forth from the process to shape a new vision, there are two things that rise to the surface for us:

1. **Protecting space that serves the purpose of our Third Place Commons and its adjacent spaces.** This is the heart of our community; it is the center of the Center and a wellspring for our quality of life. Wandering the maze of the 3 alternatives, I am deeply unsettled that this vital community resource may not have a proper place in the ultimate redevelopment plan. I am haunted by a vision that the center of our community will be swallowed by a housing development and a transit center while leaving the City with greater density than its infrastructure can handle.
2. **The speed of this process.** The pace has been measured and steady for some time but the acceleration of late with public comments closing in two weeks and new code in place in less than a month is alarming, given what is at stake. This is a time for City leadership to be forceful in resisting a pace that is driven by the influence and momentum of money.

We know from last year's public process that the community wants an improved Town Center. The wish list is extra-long with competing interests and oversized ambition for the available real estate. If we, as LFP residents, had a vote it would be for a fourth alternative: the 2005 vision and its framework for redevelopment. It's the right scale with less than half the number of housing units than are proposed for Alternative One.

Please slow down the process! We need to buy the time for more deliberative assessment of the data. Some have suggested a focus on zoning and code for the parking garage alone and setting a different timeline for what will be a better outcome overall. We urge you to seriously consider that limited objective for the short term and take more time for all the rest.

Sincerely,

Ben Moore and Marilyn McGuire
17049 Brookside Boulevard NE

Dear Lake Forest Park Commissioners,

Our names are Dale and Terri Cote. We live at 17402 44th Ave in Lake Forest Park. Our home is one of many that live along the boarder of our Town Center. Lyon Creek goes through the center of our yard and then alongside the border of the Town Center. We have lived here 26 years. Terri has lived in LFP all of her life.

We recognize that our city has an opportunity to impact the potential re-development of the Town Center. We are not opposed to development – in fact there could be significant improvements that would be a value add to our city. However, we have significant concerns regarding the timeline, density proposed, and the overall DEIS not matching the vision of our city.

This timeline is completely inappropriate - resulting in wild rumors and significant distrust between citizens and our city government. Many believe you have your own agenda and are not interested in what the citizens have brought forward as a vision for LFP, or their comments to date. I was present at the meeting where the DEIS was presented and the citizens there were very upset that you were not present to hear their comments adding to their anger and distrust. We are asking that you separate the zoning for the 300-car garage from the re-zoning of the Town Center. Address the zoning for the garage first. This will allow more appropriate time and a more thoughtful approach to how to best proceed with the overall zoning of the Town Center and provide you time to build trust by listening and responding to comments and concerns. You currently do not have the time to do this correctly.

Dale was a member of the Town Center Task Force in 2005 that resulted in the current zoning regulations. The Task Force did not conclude that the Town Center would be zoned to have 700 units as it is stated in Alternative 1 of the DEIS. Again, many people feel this is an arbitrary number added by you just to increase density. The other problem with Alternative 1 is how it is presented – ‘No Change’. We believe this creates a false choice. No one wants the Town Center to stay exactly how it is, but ‘No Change’ creates that narrative when in fact re-development could happen with current zoning. So that leaves Alternate 2 and Alternative 3 as our (false) choice. We are asking that you present Alternative 1 as ‘Current Zoning’ rather than ‘No Change’.

We have tremendous concerns regarding the height proposed in Alternative 2 and 3. You MUST do a complete light study and the impact to us and our neighbors considering these height regulations. If the result of the study shows that light will not impact our properties, please know that OUR site lines are important. PLEASE consider the setbacks along this side of the property to include a wedding cake approach with any buildings along this side. We do not want to look up to someone’s balcony. The noise also needs to be considered for our homes along this side of the property as it relates to use of the property on the other side of the fence from us and how it may be utilized (playground, service road, etc). We have currently met the Growth Management Act requirements for density. Adding up to 1700 units is a ridiculous amount of density for the Town Center and LFP and does not match with the vision our citizens have provide you. Please consider changes to our Accessory Dwelling Units regulations as a way to increase density. This is a way to spread density outside of the Town Center and still keep the charm and essence of a very unique and beautiful city. 1,700 units in the Town Center would destroy this unique community and cause us to look like Lake City.

We want change. Change that is sensible and matches the uniqueness of our city and surroundings. Please create the time necessary for you to listen, build trust, engage the community, and make thoughtful and creative decisions that will positively impact our city.

Respectfully,

Dale and Terri Cote

(206) 361-5592



Peter J. Eglick
eglick@ewlaw.net

February 1, 2019

Transmitted via first-class U.S. mail and email to SBennett@ci.lake-forest-park.wa.us

Steve Bennett, Director
Lake Forest Park Planning and Building Department
17425 Ballinger Way NE
Lake Forest Park, WA 98155

Re: Comments on Town Center Plan DEIS and Pursuant to the GMA

Dear Mr. Bennett:

Glossy, Expensive Failure: As you know I am a citizen of Lake Forest Park (“LFP”, “City”), residing in Sheridan Beach. I and many others have been struggling to keep up with the barrage of publications, plans, meetings and hearings thrown at us recently. This letter comments on the Draft Environmental Impact Statement (“DEIS”) published by the City on January 2, 2019. The content of this letter should also be included as citizen comment in the City’s Growth Management Act (“GMA”) record for the proposal.¹ These comments are informed by my over 40 years of experience with NEPA² and SEPA and as an attorney who has advised clients, including municipalities, on matters pertaining to land use and environmental law.

Based on that experience, the DEIS can only be described as a glossy, expensive failure to satisfy SEPA’s basic requirements. The issuance of this document as suitable for public comment reflects poorly on the City and is a disservice to Lake Forest Park citizens.

¹ This letter also incorporates by reference other critical citizen comments in the record. See Buck v. City of Shoreline, 2012 Wash. App. LEXIS 789 (2012).

² Pub. Util. Dist. No. 1 v. Hearings Bd., 137 Wash. App. 150, 158, 151 P.3d 1067 (2007) (“The National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. §§ 4321-4370f is substantially similar to SEPA; Washington courts may look to federal case law for SEPA interpretation.”).

The DEIS fails to fulfill its mandated function: “An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.” WAC 197-11-400(2). “The EIS process enables government agencies and interested citizens to review and comment on proposed government actions” WAC 197-11-400(4).

The Washington Court of Appeals has explained the importance of full consideration of environmental factors even for nonproject review:

[O]ur courts have recognized that environmental review can be required even when the government has not made a definite proposal for actual development of the property at issue. In *King County v. Washington State Boundary Review Board* (Black Diamond), the court held that the city's annexation decision was subject to SEPA requirements even though there was no definite proposal for actual development of the annexed property, recognizing that “[t]he absence of specific development plans should not be conclusive of whether an adverse environmental impact is likely.” As the court explained:

One of SEPA's purposes is to provide consideration of environmental factors at the earliest possible stage to allow decisions to be based on complete disclosure of environmental consequences. ... Even if adverse environmental effects are discovered later, the inertia generated by the initial government decisions (made without environmental impact statements) may carry the project forward regardless. When government decisions may have such snowballing effect, decisionmakers need to be apprised of the environmental consequences before the project picks up momentum, not after.

Magnolia Neighborhood Planning Council v. City of Seattle, 155 Wash. App. 305, 316-17, 230 P.3d 190 (2010) (footnotes omitted).

However, particularly in light of the above, the Town Center DEIS does not perform its purpose under SEPA. It is neither impartial, nor informative, nor complete as SEPA requires.³

Lack of Disclosure Concerning GMA and Code Amendments: The DEIS suffers from a striking deficiency in its failure to disclose its procedural and legal context.

³ The DEIS also contains careless proofing errors. See, e.g., page 1 (“**Date Draft Issued:** January 2, 2018” [sic]), section 4.1-page 18 (“need for approximately 220 affordable housing based on 2015 analysis”[sic], “these estimates are likely now likely outdated” [sic]). These errors do not affect the merits, but they are suggestive of carelessness and haste attendant to DEIS publication.

For example, DEIS Appendix E “Description of the Proposal” discloses that the proposal before the City is for adoption of a GMA Comprehensive Plan “subarea plan”:

The City of Lake Forest Park proposes to prepare and adopt a Town Center Plan as a subarea plan and supporting amendments to Title 18—Planning and Land Use. ...

The reference to a subarea plan has particular significance under the GMA: “A comprehensive plan may include, where appropriate, subarea plans, each of which is consistent with the comprehensive plan.” RCW 36.70A.080 (2) (emphasis added).

However, the DEIS fails to examine consistency meaningfully, substituting generalities for genuine analysis. Nor does it address, even without regard to the subarea plan context, the basic questions applicable to a potential Comprehensive Plan addition or amendment. For example, the City has published⁴ for mandatory use by its citizens a list of criteria derived from GMA requirements, as reflected in the following excerpt:

A. All amendments to the Comprehensive Plan will be evaluated using the following criteria. Explain how your application is consistent, conflicts with, or relates to these criteria. ***Applications must include a thorough response to the following criteria:***

1. The proposed amendment is supported by or consistent with the goals, policies and objectives of the various elements of the Comprehensive Plan
2. Circumstances related to the proposed amendment and/or the area in which it is located have changed sufficiently since the adoption of the Comprehensive Plan.
3. The assumptions upon which the Comprehensive Plan is based are no longer valid, or new information is available which was not considered since the adoption of the Comprehensive Plan

*

*

*

The DEIS fails to coherently address these questions. Are Town Center Plan Alternatives consistent with the City’s Comprehensive Plan? The DEIS makes several references to the Comprehensive Plan, but provides no information or analysis concerning consistency with its specific provisions.

For example, as several DEIS comments have already pointed out, the Comprehensive Plan adopted by City Council on Jan. 14, 2016, specifies a growth allocation for LFP of 551 housing units, city-wide, for the entire twenty year time period of 2015-2035.⁵ The DEIS glosses over

⁴ <https://www.cityofflp.com/Search?searchPhrase=comprehensive%20plan> (emphasis in original).

⁵ See LFP Comprehensive Plan at 42 (“Adopted and ratified in 2013, the King County Countywide Planning Policies (CPPs) provide a countywide vision and serve as a framework for each jurisdiction to develop its own

this inconsistency rather than analyzing it and its associated impacts. It fails to address implications of its alternatives vis a vis the Comprehensive Plan. Yet, these alternatives could effectively establish a residential city-within-a-city at Town Center, characterized by tripling of all of the housing units projected for the entire city over two decades. Is the assumption that growth elsewhere in the City has not or will not occur -- or that growth will cumulatively occur at Town Center and elsewhere? And what are the implications and impacts if that occurs?

Another example concerns the following Comprehensive Plan prescription for a “Mixed Use Town Center:”

Development in the town center category shall continue to be pedestrian oriented. A diversity of housing, business, commercial, civic, recreation and employment opportunities that complement the primary commercial use should be encouraged. It is not the intent of the City to mandate or require that housing be included in any development proposals concerning the Town Center, but rather to encourage it as an option.

Comprehensive Plan, Vol. 1 at 21 (emphasis added). The DEIS does not acknowledge this facet of the Comprehensive Plan or address how it squares, if it does, with each of the DEIS alternatives. Such an examination must occur for all relevant Comprehensive Plan provisions.

What amendments are proposed? The DEIS variously refers to Code amendments, adoption of “guidelines”, and the like. But no exemplars are provided, leaving the public without the means to comment. The text of the proposed amendments are apparently known to some in City government and the DEIS consultants. They may even be found somewhere in City materials not included in the DEIS. But in the absence of more specific information in the DEIS, it is impossible for the public to comment knowledgeably on what has been proposed.

Misrepresentation of Vision: For nonproject proposals, “agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC [197-11-060\(3\)](#)).” WAC 197-11-442(2) The DEIS repeatedly states that the City’s objective is to adopt a Town Center Plan that “would integrate the Vision as its foundation...” DEIS Section 3.1 at 19 (emphasis added). But the DEIS distorts and misrepresents the Vision, presenting a top-down consultant and Council version, not the genuine article. As stated in the January 24, 2019 DEIS comment letter submitted by the citizens appointed by the City to originate the Vision:

“[T]he DEIS under review diverges quite significantly from the Vision Document in terms of goals and priorities. We believe that the DEIS does not accurately reflect the wishes and opinions of the hundreds of citizens of Lake Forest Park who contributed to

comprehensive plan. As updated from the CPPs, the Lake Forest Park growth targets are 551 housing units and 244 jobs by 2035.”)

the Vision Document by participating in the community outreach programs which were the original source of the core goals and priorities expressed in the Vision Document.

We are concerned that the following issues in the DEIS represent significant deviations from the Vision Document: ...

What this means is that the DEIS fails in its fundamental purpose. It misrepresents the Vision, and consequently presents a false objective and skewed alternatives analysis. This cannot be cured by corrections in an FEIS. The public is entitled to comment on a DEIS that accurately presents the Vision and within it accurately analyzes alternatives, impacts, and mitigation. Simply acknowledging in an FEIS that the DEIS on which the public was asked to comment was skewed does not cure the subversion of the SEPA process.

Misleading alternatives: The DEIS presentation of alternatives is also skewed in important respects. For example, the “No Action” alternative is described as follows:

Alternative 1—No Action assumes redevelopment would occur in alignment with the current adopted planning and land use provisions applicable to Town Center in the LFPMC. Under current regulations, if bonus heights are applied, a building height of approximately 60 to 66 feet to the base roofline could be developed, typically referred to as 4 over 1 construction. Other buildings with lower heights may also be constructed, and redevelopment would occur incrementally in multiple phases over time.

DEIS Section 4.1 p. 2. However, the LFP Code sets a Town Center height limit as follows:

18.42.060 Building height.

The maximum building height limit in the TC zone is not to exceed 30 feet; except that a mixed-use building including residential units may be constructed to a height of no more than 40 feet. (Ord. 773 § 3, 1999)

There are Code provisions that might in some circumstances allow for more development at the City’s discretion, including through reference to the amorphous 2005 Town Center Guidelines. See, e.g., LFPMC 18.42.140, 150. However, the DEIS presents its Alternative 1 as a baseline, effectively shifting the framework of the discussion from very high density (Alternative 1 at 700

to 1000 residential units⁶) to even higher density (at 1200 residential units⁷) to extremely high density (at 1500 residential units⁸), when the actual undisclosed baseline is considerably more moderate per Code section 18.42.060.

Councilmembers and others in City government have lectured the public that criticism of the DEIS alternatives distortion is born of ignorance about the DEIS process. For example, one such Councilmember justification has been:

The Draft Environmental Impact Statement is not a plan nor does it represent what developers might propose. The state law requires this exercise for us as a council to evaluate the impacts of “no change” from the current code, as well as a more extreme and middle option.

However, this is no response when the City’s DEIS inflates the “no change” scenario – which the state law does not require.

A recent statement by the LFP Planning Director is equally ill-founded. As the City’s SEPA Responsible Official, who is supposed to supervise preparation of the DEIS, he recently chided:

The City is not well served by asking the consultant to analyze the impacts of only a modest amount of development under Alternative 1.”⁹

This is not an innocuous statement. Nor is it correct.¹⁰ Of course a DEIS considers a range of alternatives. But when the objective is clear -- here examining changes that are true to the Vision -- injecting an inflated baseline skews SEPA “no action” alternative review and defeats the public comment and DEIS-to-FEIS progression. If the Planning Director does not favor an honest no action alternative, and would like to also include an (unlikely) “no action” alternative that assumes unrealistic maximization of every hypothetical bonus and benefit under current Code, that can occur. But, deceptive labelling of a steroidal hypothetical alternative as “no action” is a disservice to the public and the process.

It’s not enough to just acknowledge this in an FEIS. That would mean that the public had no opportunity to comment on DEIS analysis of legitimate alternatives consistent with the Vision. In other words, SEPA is not satisfied by circulating a DEIS with palpably false alternatives and

⁶ See, e.g., DEIS sec. 4.3 at 49.

⁷ See, e.g., DEIS sec. 4.3 at 49.

⁸ See, e.g., DEIS sec 4.3 at 50.

⁹ Email from Planning Director Stephen Bennett, January 18, 2018.

¹⁰ Both the Planning Director and the Otak DEIS consultant have refused to explain -- until after the DEIS comment period closes -- the origin of the DEIS’ peculiar “no action” alternative. *Id.* The Planning Director has also refused requests to extend the comment period to allow citizens to better address this and other issues despite his authority to grant such an extension under WAC 197-11-455(7).

then issuing a backfill mea culpa in the FEIS. Such backfilling defeats public participation, fatally impairing the public review and comment opportunity that a competent DEIS provides. The DEIS itself must be reworked and the recirculated for public comment.

Flawed DEIS Traffic Analysis: The DEIS utilizes Synchro software modeling to analyze existing traffic conditions in the area and anticipated traffic impacts. DEIS Section 4.5 at 81. Synchro analysis is relatively simple and is therefore often used, particularly because the cost of Synchro analysis is less than other software methods. Synchro is basically a static tool: volume, channelization and signal timings are input and a number results, but Synchro cannot replicate real world existing conditions in oversaturated situations. When there is not much congestion and when study intersections are relatively isolated, Synchro can be a competent tool. The DEIS does not -- but should -- explain how and why the decision was made to rely on Synchro, which does not capture delay well in closely-spaced situations such as the Town Center study area.¹¹

As a result of its severe limitations, the Synchro model in circumstances present at Town Center can report LOS grades that are entirely out of touch with reality. Some ground-truthing is therefore necessary if Synchro is used. However, the DEIS is silent on whether results obtained with Synchro were checked against real world situations at relevant intersections?¹²

Further, the DEIS touts its use of Synchro with a reduced trip generation profile based on “Mainstreet USA.” DEIS Section 4.5 at 78-79. However, the DEIS text does not disclose what differences, if any, there are between generally accepted ITE Trip Generation analysis and the MainStreet results. In a similar vein, while the DEIS states generally that the values it uses are not the same as but are “consistent with” forecasts using for example the PSRC model, it should but does not provide an actual comparison.¹³

To realistically analyze existing and anticipated traffic conditions in an area such as Town Center, a different model such as VISSIM, more robust and sophisticated, must be used. VISSIM is a micro simulation model that more accurately assesses existing conditions and anticipated impacts when there are closely spaced intersections and oversaturated conditions. VISSIM is a simulation tool: it takes into account every vehicle entering the study area, acceleration, braking,

¹¹ Synchro does not take into account queues spilling from one intersection to another nor does it effectively account for inadequate turn pocket length potentially resulting in spill back onto the mainline.

¹² According to the May 2017 Washington State Department of Transportation (WSDOT) Traffic Analysis Guidebook, “Synchro is not recommended for ... oversaturated conditions.” Even in situations where Synchro is an appropriate tool (which is not the case here), WSDOT still “recommends that SimTraffic be considered for use as an error check/validation tool for a Synchro model. . .” SimTraffic is a “very basic microsimulation model, which is part of the Synchro Studio Package.” There is no indication that SimTraffic was used in preparation of the DEIS.

¹³ The DEIS also acknowledges that in its traffic operations analysis “signal timings and coordination were optimized to maximize the efficiency of the system...” apparently thereby using hypothetical optimistic projections to minimize impacts. DEIS Section 4.5 at 81.

and driver behavior characteristics. While Synchro should not be used for oversaturated conditions because it does not provide an accurate assessment when there are closely spaced intersections and queues¹⁴ spilling back, VISSIM does provide an accurate assessment in such circumstances.

The DEIS actually acknowledges, with regard to queuing in particular, the limitations of the Synchro model it relies upon:

As described above, the traffic operations analysis performed uses isolated intersection analysis, as measured by the Synchro 10 software. This analysis measures queuing for each intersection independently and does not capture how queues may impact adjacent

intersections. Delays from peak period queuing can affect operations along the state routes and on the Town Center site. For example, at SR 522/SR 104, queues up to 1,300 feet in the eastbound direction and 400 feet in the southbound direction were observed, which affect upstream vehicle operations at SR 522/NE 170th Street and SR 104/NE 175th Street respectively. Given this condition, vehicle operations on SR 522 may be more congested at times than model results show in Table 3.5.3.

DEIS Section 3.5 at 76. And the DEIS states, for example, that vehicle operations “may be more congested at times” than it discloses. But the DEIS does not provide a credible explanation of why the City failed to make the effort to obtain more accurate information.¹⁵ The VISSIM model is more labor intensive and expensive to run than the Synchro model, requiring significant data collection and calibration to replicate/simulate the existing conditions. However, this is no excuse on a crucial issue, especially when the City is said to have already spent over

¹⁴ When assessing traffic impacts it is important to know the length of the queue.

¹⁵ At one point, the DEIS shirks queuing analysis saying that when specific projects are proposed -- after a Town Center Plan has long since been adopted -- review “may include additional traffic and queuing analysis.” DEIS Section 4.5 at 94 (emphasis added). This deferral of a key factor in traffic analysis would mask impacts that can and should be disclosed at the nonproject stage. “The SEPA process shall be integrated with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to seek to resolve potential problems.” WAC 197-11-055(1) (emphasis added).

\$600,000.00 on consultants, and consultants to interface with the consultants, and consultants to chat about what other consultants' non-scientific "outreach" has turned up.

The failure to include an analysis based on VISSIM, or another comparably refined and accurate modelling tool and to realistically assess both existing conditions and anticipated traffic at one of the City's most critical locations, is significant. A DEIS (and City Council) more focused on downstream design issues and other matters should instead be drilling down to obtain the data necessary for the fundamental question of traffic functionality.

Town Center Internal Level of Service Ignored: As a result of its disclosure and analytical shortcomings, the DEIS understates level of service at key external intersections. Further, even where significant level of service problems are disclosed, the DEIS glosses over what should be a hard look and discussion of mitigation.

Lack of rigor in the DEIS analysis of external site traffic impacts is matched by failure to take a hard look at internal circulation issues. The DEIS states that all internal Town Center streets "may continue to be privately owned and maintained." DEIS Section 4.5 at 95. It presents a jumble of aspirational what ifs concerning internal circulation such as "so-called "festival streets" and pedestrian and bicycle amenities. But it does not analyze for the public or decision makers¹⁶ obvious issues concerning internal circulation and access from and to Town Center.

One threshold question, left unaddressed, is whether internal streets should be private given their critical connections with the outside world and the City's regulatory authority to require public streets as a condition of development.

The DEIS sidesteps another key question as well: what happens to internal circulation, and egress from Town Center in the PM Peak Hour when vehicles exit the Sound Transit parking garage? The level of service at key external intersections is disclosed to some extent, as noted previously. But what happens internally on the Town Center site itself under the Alternatives? For example, will Town Center choke on its own traffic as queues of cars trying to leave form? And will Town Center still be the town center -- a community focal point -- if cars cannot readily access or egress during peak periods?

The DEIS assumes only 125 PM peak hour trips exiting from the Sound Transit parking garage. DEIS Section 4.5 at 79. However, no justification is presented for this assumption other than a vague reference to "typical transit travel patterns in the Puget Sound region." *Id.* There is no disclosure of those patterns or analysis of whether and how the distinct Town Center situation supposedly aligns with them. Further, the PM peak hour parking garage trip generation estimate

¹⁶ The existence of an internal street system is acknowledged in passing. E.g., DEIS Section 4.5 at 80, 88, and 89. But impacts on internal circulation and access/egress are not analyzed to inform a City decision on adopting a Town Center Plan. DEIS acknowledgement of the issue is limited to just that – bare acknowledgement. See, e.g., DEIS Section 4.5 at 89 ("The eastbound queue exiting the Town Center at NE 175th Street is expected to be longer than in Alternative 1, which would affect operations at internal intersections in the Town Center site").

assumes a 300 car garage. However, the DEIS repeatedly notes that the Sound Transit garage will be for a “minimum of 300 vehicles.” DEIS Section 1.0 at 1; Section 3.1 at 20 (emphasis added). Why has the minimum been treated as a maximum in the DEIS analysis, thereby reducing recognition of the potential impact of garage trips, especially during the PM peak?

If maintenance and enhancement of Town Center as a community focal point is an overarching goal of a Town Center Plan then the issues noted above should have been the subject of real analysis in the DEIS. Their diminution raises the question of what is the actual purpose of the Town Center planning process. Is it to satisfy the current owner’s development, profit, or resale goals? Is it to accommodate Sound Transit? Is it to have Town Center serve regional over municipal purposes? Is it to create a faux “downtown” enclave to satisfy various planning and politician fantasies? Or is it to improve on Town Center as the community’s vital center?

On the Merits: “It became necessary to destroy the town [center] to save it”¹⁷ is emblematic of stubborn government folly. The City is in jeopardy of having this quote become its new motto.

Conclusion: The DEIS should be rewritten and then recirculated for public comment. The Planning Director and the EIS consultant should be given clear written instructions to add required SEPA and GMA information and analysis.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Eglick', written in a cursive style.

Peter J. Eglick

¹⁷ https://en.wikiquote.org/wiki/Vietnam_War#B

Steve Bennett, Planning & Building Director
City of Lake Forest Park, City Hall
17425 Ballinger Way NE
Lake Forest Park, WA 98155

RE: Town Center Plan DEIS

Dear Mr. Bennett and Members of the Lake Forest Park City Council,

I am writing you today as someone who has grown up in the area, as a Lake Forest Park resident since 2012, as someone who was drawn to this neighborhood because of its natural beauty, and as a fish biologist at the University of Washington, Bothell. I have read the DEIS and welcome this opportunity to share my thoughts on this potentially very impactful development. Cities throughout the area are updating their town centers and commercial areas, and it makes sense that Lake Forest Park and Merlone Geier would seek to do the same. What makes Lake Forest Park different, and reflects its unique character, is that it retains environmental features and potential far beyond what is typical for this area. This natural bounty is no accident – it was born in Ole Hanson’s vision that “all the *natural beauty* must be preserved” and has been carefully nurtured through the decades by the painstaking effort, stewardship, and foresight of the citizens and leaders of Lake Forest Park. The DEIS, while describing itself as “consistent with the community’s vision,” reflects none of this. I’m sure you will hear from many citizens about density, and traffic, and process, and community disruption, and degradation of our quality of life. All of these are important. Given my particular areas of interest and expertise, I will focus on water and riparian zones.

It’s difficult to critique the three proposed developments for their impacts on stream health because there is no plan to critique. Instead, the section on Analysis and Mitigation (Chapter 4) relies on:

- 1) **Lack of specificity given that this is not a project specific IES.** There are vague references to and recommendations for “best practices” and “green building practices.” Where will these be? Will they be effective? Will they even be implemented? We can’t know because the plans have not been made, and yet we are being asked to consider code changes to allow development anyway.
- 2) **An unwarranted belief that adherence to applicable building codes and requirements eliminates negative impacts.** E.g. “Since development under any alternative must comply with stormwater management requirements, not significant difference in stormwater flow, volumes, or quality would be expected ... “ (p. 44). “Compliance with the City’s Municipal Code requirements and development standards, as well as other applicable regulations, would provide protection against potential environmental impacts.” (p. 45). At best it may be said that adhering to requirements is better than ignoring them, but nobody familiar with urban water ecology would mistake following the rules with preventing harm.
- 3) **The false implication that increased development is a pathway, or even a requirement, for environmental preservation and enhancement.** The Analysis

and Mitigation chapter is riddled with phrases like “... as the extent of redevelopment of the site increases, the potential for beneficial improvements to natural elements also could increase.” Leaving aside the ominous “could,” this line of reasoning is exactly backwards for a community in which “the forests, wetlands, streams, and wildlife of Lake Forest Park provide the highly valued, desirable character, lifestyle, and ecology that draw residents to this community.” (LFP PROS-T). Vague suggestions of environmental protection and mitigation should NOT be a reward we accept for changing code to meet the needs of developers. We, as a community, should be using code to make sure the developers meet our needs first.

Because there is not real plan to critique, I would like to pose a set of questions I hope will articulate a vision for what a revitalized LFP Town Center consistent with community values could be.

- **What if, instead of filling nearly the entire site with parking lots and tall buildings, we reserved a substantial central area as a green space?** The benefits of green space, particularly trees, for human and stream health is well-documented and would set our LFP from the many other renovated centers in our area.
- **What if we moved Lyon Creek so it passed through this green space?** The DEIS describes Lyon Creek as a “defining characteristic of the Town Center planning area.” (p. 9). Why is it relegated to the edge of the site, cut off from the remainder of the development?
- **What if Lyon Creek had a restored riparian area, partly “wild” and partly suitable for pathways, picnic tables, and other activities that would make Town Center a destination?** The DEIS suggests increased setback and restoration are an opportunity provided by dense redevelopment. Let’s turn that reasoning around – we should have riparian restoration because it serves the community interest, and insist that development be limited to a point that respects that community value.
- **What if green infrastructure, e.g. for regulating water runoff and quality, was mandated at the beginning of the project?** Green retrofitting is both difficult and expensive.
- **What if Lyon Creek restoration allowed it to support viable runs of salmon?** Is there any more iconic symbol of regional and community values than that? Is there any other Town Center that could boast such an attraction? Both Lyon and McAleer Creeks had returns of spawning adult coho this year, and the newly restored Whispering Willow Park section of Lyon Creek support juvenile coho. (Videos of both can be seen on the Lake Forest Park Stewardship Foundation website).
- **What if our central green space contained a gazebo for public events, environmental education, and recognition of the areas aboriginal and more recent history?** What an opportunity for community engagement and education this would be.

There will always be pressures to maximize short-term interests and profit over the long-term welfare of the community, but I believe Lake Forest Park can do better. In this vein, I will close with one final and hopeful question:

- **What if, rather prioritizing short-term commercial interests, your legacy as a community representative was to bequeath to our children a Lake Forest Park that remains one of the Seattle area's last great places?**

Thank you for considering this input, and for your service to our community.

Sincerely,

Jeffrey S. Jensen

3325 NE 181st St.
Lake Forest Park, WA 98155

Dear Mr. Bennett,

January 31, 2019

First I want to thank you for taking the time to read through the many citizen comments that have slammed and jammed your mailbox over the last few days. I am excited about the future of this great city, but I do have concerns about the current push to move forward so rapidly with the current proposed alternatives for the LFP Town Center Development. My first request would be for the city to move forward as needed to meet the ST3 plan for a parking garage, but to decouple the parking garage plan from the larger and more impactful plan that will determine the long term character of our Town Center. Here's hoping that our great city representatives will be willing to separate these two issues so that together after more shared engagement & dialogue, we can make our Town Center's final plan one that we can all not just live with but feel proud of for the long term. In light of this, I would like to share few of my current recommendations:

- 1) Of the currently proposed alternatives Alternative 1 would be acceptable but with the following density & 66 ft height restriction: no more than 300-400 living units to enable diversity of age, culture, and income with alternatives in pricing, floor plans and amenities.
- 2) Ensure public access to indoor and outdoor commons, Lyon Creek nature path, rooftop City park with views and activities open to public: restaurants, picnic/sitting areas, skate board/bike park, playground, pickle ball court, possibly w/partial roof coverage to ward off rain (keep open sides).
- 3) Focus on GREEN choices: use natural materials and finishes & design green spaces to include gardens (rain & traditional), trees, scrubs; use of green power sources: (solar, etc.& possibly stationary bikes that citizens might ride at various designated stations to produce power for lighting, heating outdoor sitting areas, eating areas, etc.
- 4) Make spaces adaptable for variable uses (movable walls); create shared work/business rental spaces/offices; Also: reclaim grey water for public landscaping; recycle, compost, minimize waste; install electric vehicle charging stations in garages; etc.
- 5) Further study to measure longterm impact of present & future increase in traffic/congestion & added building structures so that the final plan protects our precious wetlands, waterways/fish habitats (Lyon Creek & Lake Washington). If the Fire Station is already experiencing issues around land stability, what will adding more to this already sensitive area do to the health of our city. And....what are the short and long term effects of the ongoing & continued increase in traffic & congestion on our already highly compromised air quality, street pollution runoff, fragile and already compromised wetlands, etc.

Let's put our heads together to revive our aging Town Center and improve it so that it becomes a more functional, inclusive, and livable place that helps young people to come,

old people to stay, and integrates the realities of our regional growth and future with our local commitment to humanity and nature.

Thank you!! Connie Barnes
18215 Ballinger Way NE

RECEIVED

FEB - 1 2019

CITY OF LAKE FOREST PARK

Dear Mayor and City Council Members,

It saddens to me hear all of the negative talk around the way the city officials have handled the planning and development of the Town Center and it's zoning. Several Lake Forest Park residents volunteered countless hours of their time to take part in the planning process for the Town Center. These residents felt that they came up with a great plan in Alternative 1 (which has even been altered from its original numbers) and thought that the process was over only to find out that there are 2 more alternatives on the table? Seems like the council had their own ideas on what they wanted to see and did not take into consideration what the task force came up with.

I was born and raised in Lake Forest Park (50 years) and am raising my own family here with my husband. We love everything that the LFP area has to offer. We are avid walkers to/from the Town Center and surrounding neighborhoods. I understand that change is inevitable and would like to see the Town Center get a facelift but not to the detriment of the current residents of LFP.

I **URGE** you to reevaluate the following:

- 1) **Impact on Traffic:** - 178th is already used as a cut through for people getting to/from work by people who don't live in our community. The traffic has indeed increased in the last 5 years as I used to be able to pull out of my street onto 178th very easily but now have to wait anywhere from 3-6 minutes for a big enough gap to pull into.
- 2) **Parking** - With the addition of these new units there will indeed be an impact on the parking at the Town Center and I believe that there needs to be additional time spent reevaluating the effects that this will have. The current evaluation is not good enough in my opinion.
- 2) **Safety** - Being an avid walker, I fear for my safety and the safety of all our LFP residents who walk to/from the Town Center and in/around our LFP neighborhood. The type of growth that these alternatives are proposing will surely impact safety in the LFP community.

Please slow down and reexamine these issues so that the LFP community can feel good about the changes to come.

Thank you!

Tamara and Pete Tikalsky
17200 35th Ave NE, LFP

1.0-4: The three scenarios considered do not represent “book ended” scenarios, at least for the lower density alternative. Alternative 1 is stated to be based on an outline of a plan submitted approximately 15 years ago which never received approvals nor was negotiated with a special task force, as the guidelines require. Thus, this scenario is akin to a developer’s wish list, rather than lower book end.

1.0-4: Alternative 1 – No Action is incorrect. According to the 2005 guidelines:

“Step 8: City Council reviews and acts on the Staff recommendation regarding master plan and development agreement. Council would **likely approve a rezone** subject to the terms and conditions of the Development Agreement.” (bolding and fontsize mine)

This indicates that to utilize the 2005 guidelines, a rezone would have to occur. Further, the “likely” indicates that a rezone is not guaranteed. Thus, the action to rezone the Town Center for Alternative 1 is the same action that is required for Alternative 2 and 3. This is not a “no action” scenario. However, there is a simple no action scenario which follows the code:

“18.42.040 Limitations on use.

Every use locating in the TC zone shall be subject to the following further conditions and limitations:

A. Residential uses are not permitted as separate projects; they must be developed in combination with commercial or nonresidential uses as part of a single site development plan. Residential uses may not be developed at a density of greater than seven dwelling units per acre;”

It is important to use a true “no action” scenario. For example, the traffic analysis defines significant impacts relative to the “no action” scenario. Using an “action” scenario, as Alternative 1 is, invalidates the conclusions of the traffic analysis.

2.0-1: “No action” scenario is again inaccurate as significant action consisting of a special task force and city council vote to rezone would be required. 18.42.040 should be used instead.

2.0-1: Action alternatives are not supported by Vision statement. There was no significant community input on density or building heights, much less support for increasing them beyond the 2005 guidelines. Please provide concrete and quantitative information from the Visioning process to support this statement, or remove any increase in height above the 2005 guidelines from consideration.

2.0-1: “Book-ends” is again inaccurate as 18.42.040 provides a much simpler and inarguable lower book end.

2.0-1: An ST3 parking garage should not be assumed in all scenarios. Alternative sites, such as the Chevron Station and Veterinary Hospital, are potential alternatives.

2.0-2: Alt 1 – No Action. The 700 units is not supported by the building sizes drawn in later Figures. GSF is <500,000, insufficient for the 1000sf average unit that the Otak consultant is on record telling the

Planning Commission is the average size. This neither represents a low book-end, nor a no-action scenario, nor a physically plausible plan.

Table 2.1: This table needs to define what a dwelling unit is, including the median size and distribution of sizes. It should also specify the gross square footage of residential space. The table should also include the public open space added in each scenario and labeled in Figures 2.1, 2.2 and 2.3.

2.0-3: Alternative 1 – No action is again incorrect. It requires significant action in the form of a special task force and a city council resolution.

2.0-3: “adoption of the 2018 Vision would not occur” is misleading for two reasons: 1) the majority of the Vision is already contained in the 2005 guidelines and 2) the Vision would be used by the special task force and city council to evaluate and negotiate any agreement under the 2005 guidelines.

2.0-4: Why are only greater numbers of units considered, and not lower numbers of units? This results in a biased alternative. If there is uncertainty in the number of units, and the goal is a lower book end, the lowest number of units must be used.

2.0-5: “did not move forward because of the economic recession” is attributing something which cannot be demonstrated. The proposal did not move forward, period. It was never reviewed by a special task force or the city council. If the recession had been the only factor, this should have been built within the past 5 years as property values and housing demand has exceeded pre-recession levels for approximately 5 years now. Therefore, there is no reason to use this as a lower bookend.

2.0-5: Why are “civic and community uses and spaces ... expanded” in Alternative 2 but not specified in Alternative 1. The Guidelines are crystal clear that they can only be used in exchange for public amenities, which are incredibly similar to those outlined in the Vision statement. This presents a biased proposal.

Figures 2.1, 2.2 and 2.3 use different legends. These need to be consistent between all 3 figures for comparison.

Figure 2.1: The buildings are not large enough to accommodate 700 units of 1000sf, as stated by the consultant to the planning commission. Why is there scenario not self-consistent?

Table 4.3.5 needs a new description as it does not make sense.

Table 4.3.6: Drop the decimal place and take a lesson in significant figures.

4.3-55: “Increases in K-12 student population would occur incrementally over time” – how is this determined? The proposed code and guidelines have no statements about how many units can be built in a given time. It is likely that the population increase would be punctuated and would not increase gradually – it is possible that the site could be redeveloped all at once. For the DEIS assumption to be true, specific limits of new units allowed per unit would need to be put in place.

4.3-55: Please provide the specific information that the school district relayed about capacity. As the parent of a 19-20 Kindergarten, we are being told that there is insufficient space at Brookside Elementary for Kindergarten and our child might be placed elsewhere in the district. This suggests that there is not capacity. The DEIS statement is unsupported, unattributed and unverifiable.

4.3-57: The number of things wrong with the Open Space analysis is staggering. First, private open space should not be included in the calculation of PROST acres per 1000 population. My backyard is not included in the PROST acreage, so a private Town Center roof top garden should not be either. Second, the existing PROST acreage within walking distance of Town Center should be assigned solely to the new Town Center residents. The parks are already used by the city population – in fact, it is clear that our community does not have enough open space and is trying to remedy that. Either the existing PROST acreage needs to be removed from the calculation, or the existing population which utilizes them needs to be added in. Third, “if existing rain gardens and open spaces that are likely to be retained” are being included in the open space calculation, these (and all similar features within the city) need to be added to city-wide PROST acreage used for comparison.

4.3-57: “All scenarios shown in Table 4.3.9 are above the 2 acres per 1000 existing conditions”. This is simply not true. For Alternative 1, there would be 2.5 acres of new public open space (100,000sf for 1000 units at 100sf per unit plus 10,000sf for commercial). With a population of 2400 (2.4 people per unit times 1000 units), this is 1 acre per 1000 people, only half of the existing condition. (The amount of open space per 1000 people for Alternative 2 and 3 will also be 1 acre per 1000 residents because the 100sf per unit assumption is the same and the population per unit assumption is the same).

4.3-57: This table is grossly misleading. Let’s follow the logic in this section: 1) LFP has significantly less park/open space than the national average and is working to change that; 2) let’s add up all the somewhat nearby existing open space; 3) then add up new TC open space with the existing open space, which is already inadequate for our population; and 4) include the existing open space but not the existing population, in the acres per people (Table 4.3.9). This grossly misrepresents the open space per new resident. Only the new open space should be included. Or all of the current population which uses these spaces (i.e. the entire city), should be included. This calculation needs to be consistent and not a bait-and-switch.

4.3-58: “All scenarios ... are above the 2 acres per 1000” does not include the population which already uses these areas. This calculation is simply bogus.

Table 4.3.10: Why does this table add up to more than any of the three alternative scenarios? This creates a bias that all of this is achievable with the updated code even though that is not true even under full development of Alternative 3.

4.3-62: Municipal services analysis is insufficient. What is the additional cost to the city per resident and how will this be covered by city revenue from the new residents? Will costs have to be born by existing residents? What about impact fees?

4.3-63: Fire and emergency access analysis is insufficient. Increased traffic, particularly at afternoon peak when traffic backs up at 170th.

4.3-65: Schools “because growth would be expected to occur incrementally”. What is the assumption based on? Redevelopment would almost certainly occur in bursts, which is highlighted in this very document when Alternative 1 is discussed as a first phase of redevelopment. 1500 people, 10% of our population, could be added at once. This is not incremental growth. Specific caps on annual growth should be implemented if the DEIS will not evaluate the impacts of punctuated growth.

4.3-66: What guarantee is there that the development would be gradual? Without specific provisions in the code, this analysis is not sufficient.

4.4-72: "natural gas to the city of Shoreline". This reveals that the DEIS did not even consider our city, Lake Forest Park. Please actually contact PSE and get something on the record about the availability of service.

4.4-73: Shoreline again.

4.5-88: "transportation impacts of Alternatives 2 and 3 are measured against the transportation conditions of Alternative 1 No Action". This creates a fundamental flaw in the analysis. Alternative 1 is not "no action." It requires appointing a special task force and vote from the City Council to rezone the Town Center. This analysis must use a true "no action" scenario which uses the 18.42.040 and the 7 dwelling units per acre stated therein.

Table 4.5.4 – The impact of choosing a 'significant action' alternative 1 is that the traffic analysis would find that 4 of the 10 intersections are significantly impacted (i.e. increased delay of >5s). I can only use current conditions (Table 4.5.3), but intersections 2,5,6,9 would all be significantly impacted under Alternative 2. An appropriate Alternative 1 must be used for this analysis to be accurate.

Table 4.5.5 – 7 intersections (2,3,5,6,7,8,9) are significantly impacted compared to the current levels. A "no action" Alternative 1 must be used.

4.5-101: The threshold of significance should not be set by Alternative 1, which is not a "no action"

Solar calculations: The solar calculations of shading need to be improved to study interior public spaces. In particular, the impact of East-West orientation has the potential to shade the entire festival street in Alternative 2 even during the summer solstice, making it a rather unappealing outdoor public space. Specific guidelines need to be developed to ensure reasonable solar exposure to all public areas.

Town Center Rezoning

The city of Lake Forest Park along with the community's environmental health and upholding standard for prospective growth is the glue that holds our neighbors to our neighborhoods. Our population is already pushing our roads to their limits as well as classroom capacity. I believe that by replacing the Lake Forest Park Town Center with an upward reach of 1,500 housing units, many community members of Lake Forest Park would lose their interest in their admiration for this city and look elsewhere for a community less infested by over-population.

Lake Forest Park's infrastructure is sustainable to accommodate our current citizens. Our community thrives off educational standards, the ability to accommodate growing employment as well as product consumption and engagement with our local woodlands. I am worried that with the addition of 1,000+ members to our city's population, the current community will lose intrinsic value for Lake Forest Park and will solely enjoy their homes rather than the wholesome community brought together by the Town Center that is thoroughly shared today.

The Town Center has been the hub for community gatherings for multiple decades, and the people of Lake Forest Park will be devastated if the space we have loved and valued for so long is transferred into high-rise apartment housing as well as transit Park & Ride. It will create an abundance of negativity toward our city council if you forget to include the generations who have worked very hard to not only purchase but sustain their home as well as continue their civil engagement. The approval of this Rezoning would decrease our vibrance as a unique, distinctive location that very few towns in North-Western Washington have the ability to offer.

Questions:

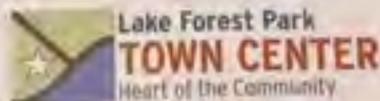
- Do we have employment available to accommodate the increased waste production?
- Before this proposition is to become reality, shouldn't we; 1) Expand our road ways to accommodate the congestive traffic. 2) Refurbish our local vegetation that is both growing and becoming outdated to diminish the risk of injury or death caused from crashing debris. 3) Set up cameras on highly traveled residential streets that are consistently used as short-cuts to speed through as connections to main roads. (EXAMPLE- 44TH AVE & 180TH/NE PERKINS WAY)

Conversely,

Jack Neffner

jneffner@gmail.com
206-883-6188

LAKE FOREST PARK TOWN CENTER PLAN
DRAFT EIS COMMENT FORM



Please use this form to comment on the Non-Project
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

I have several comments on the Draft EIS, in no particular order:

→ ~~My~~ I have lived in Lake Forest Park for 2 years, my husband grew up here. We have three children and are planning on staying in LFP for decades. We live very close to the Town Center thus will be directly impacted by development here.

→ I am not anti-development, and definitely feel the Town Center can use some updating and improvement.

→ The way the three options was presented made me feel that the target audience was the developer (i.e., subtext presented as "we have to offer these concessions to the developer, or else they won't be interested in the project"). This is disingenuous. Yes, obviously, a developer is going to want the most "bang for their buck" which likely translates to Option 3/ more housing. This, however, is nowhere near what the people of LFP stated they wanted. ~~The Council would~~ do well to remember they work for the people of LFP, not Merlone-Geier. ~~The~~

Your comments at this public hearing or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155
lcl.lake-forest-park.wa.us. Oral comments recorded at tonight's meeting will also be part of the public record on the DEIS

→ given the above, my preference is for Option 1, which allows for

significant change, development, and growth within existing code as written.

↳ Relatedly, I agree with the comments that calling Option 1 "no change" is misleading. Option 1 should be called "Utilizing Existing Code" or something similar.

→ Transparency is key, with a major change like this, you need to allow appropriate time for analysis, public comment, and debate. Rushing this process risks loss of trust from your community/constituents.

Thank you.

RECEIVED

JAN 18 2019

CITY OF LAKE FOREST PARK

To Planning dept.

From Tom Corbett, 17500 Birch Dr. NE, Lake Forest Park

206-356-2571

I want to be on record strongly supporting option 3 for Lake Forest Park commons development. L.F.P. needs to get ahead of the curve for adding affordable housing. We cannot continue our path toward a quiet retirement community. I would hope that the majority of people living in the new units would be car-free and take advantage of the terrific mass-transit solutions we have today, and in the future. Move express busses along #372 to U.W. Light Rail and #522 to nearest ~~park and ride~~ ~~train~~ Link Light Rail stations, and toward Canyon Park jobs. This will help us fight climate change rather than just giving lip service.

Once a decision is made, our schools and parks will have time to adjust to the growth needs before development actually happens. They will not prepare for growth if we leave the commons 96-15 with option 1. I have no vested interest in the development other than the desire for my kids to be able to live here, and ~~the~~ my desire to see a mix of ages in LFP rather than a retirement community.

Thanks, and best wishes!

Tom Corbett
Tom Corbett

LAKE FOREST PARK TOWN CENTER PLAN
DRAFT EIS COMMENT FORM



Please use this form to comment on the **Non-Project** Draft Environmental Impact Statement (DEIS) for the Town Center Plan

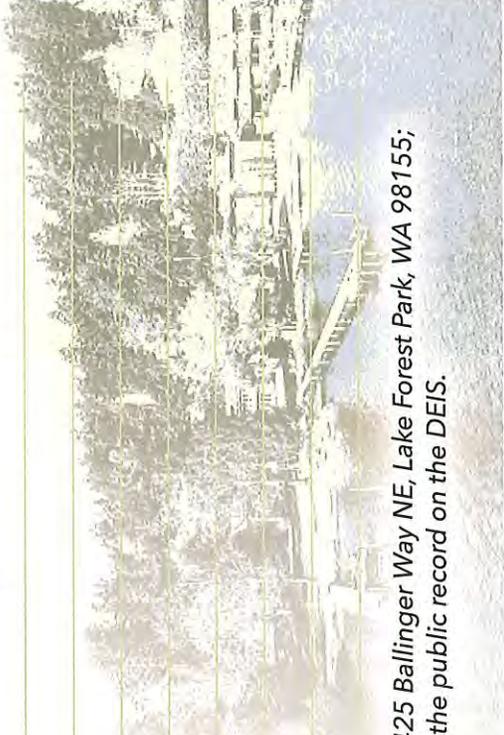
Dear Steve Bennett, I attended the packed meeting on the 16th. I am gravely concerned over what would be unrestrained and irresponsible, runaway development with no consideration of the consequences and the inevitable loss of LFP's distinctive and exceptional character.

I vote no on all the options. Option one is no action proposes too many apartments, we understand that more residents bring more automobiles and more use of our water and sewer utilities! Adding a small number of apartments is one thing but option one is too much.

Our area in Sheridan Heights is already in need of traffic calming, please do not allow this plan to go forward. I feel the Village has spoken very clearly, it was disappointing that one city council member was present.

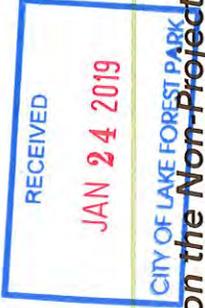
Law J. Giviss - 16420-38th ave NE, LFP
g.l.g@comcast.net

P.S. in Traffic Calming, has anyone suggested making the 39th + 38th Ave NE intersection with Boshell way and Exit Only?



DRAFT EIS COMMENT FORM

1/2



Please use this form to comment on the Non-Project

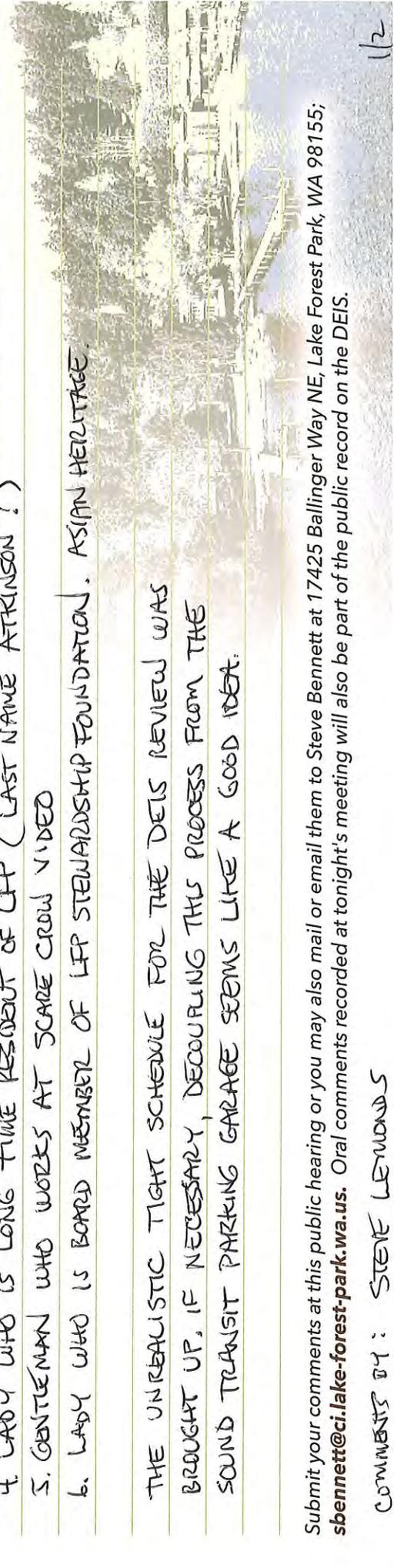
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

IN MY OPINION, THE COMMENTS MADE BY THE THREE MEMBERS OF THE TOWN CENTER VISION COMMITTEE WERE PARTICULARLY SPOT ON. THE GIST OF THOSE COMMENTS WERE THAT THE THREE DEIS ALTERNATIVES WERE NOT IN KEEPING WITH THE VISION TASK FORCE POLICIES AND GOALS. THE COMMENTS WERE PRETTY MUCH DIRECTED TOWARD ALTERNATE 1. I DON'T BELIEVE ALTERNATES 2 AND 3 HAD ANY POSITIVE COMMENTS. I SEEM TO REMEMBER THE PHRASE "BACK TO THE DRAWING BOARD" AND "WORK WITHIN EXISTING CODES" MENTIONED MORE THAN ONCE. UP TO TOO RESIDENTIAL / MULTI-FAMILY HOUSING UNITS (SCENARIO FOR ALTERNATIVE 1) WAS MENTIONED AS BEING MUCH HIGHER THAN THE 400 MAXIMUM UNITS FROM THE VISION GOALS. ALTERNATIVE 1, WITH 60-66 FT TOP FLOOR HEIGHT, SEEMS HIGH TO ME. CAN A LIMIT OF RESIDENTIAL STORIES ABOVE THE BUSINESSES BE KEPT AT THREE?

OTHER SPEAKERS ^{WHO} ~~THAT~~ MADE GOOD COMMENTS WERE AS FOLLOWS:

1. JULIAN ANDERSON ^{AZ}
2. ENVIRONMENTAL ATTORNEY
3. LADY WHO HAD TO MENTALLY DISOBE AUDIENCE MEMBERS TO DEAL WITH HER NERVOUSNESS WHEN SPEAKING
4. LADY WHO IS LONG TIME RESIDENT OF LFP (LAST NAME ATKINSON?)
5. GENTLEMAN WHO WORKS AT SCARE CROW VIDEO
6. LADY WHO IS BOARD MEMBER OF LFP STEWARDSHIP FOUNDATION. ASIAN HERITAGE.

THE UNREALISTIC TIGHT SCHEDULE FOR THE DEIS REVIEW WAS BROUGHT UP, IF NECESSARY, DECOUPLING THIS PROCESS FROM THE SOUND TRANSIT PARKING GARAGE SEEMS LIKE A GOOD IDEA.



Submit your comments at this public hearing or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155; sbennett@ci.lake-forest-park.wa.us. Oral comments recorded at tonight's meeting will also be part of the public record on the DEIS.

COMMENTS BY: STEVE LETOMAS



Please use this form to comment on the Non-Project
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

THE PLANNING CONSULTANT MENTIONED THAT THE TOTEM LAKE TOWN CENTER WOULD BE ^{#2} A GOOD COMPARISON FOR THE LFP TOWN CENTER. I'M NOT SURE THAT IS THE CASE. THE TOTEM LAKE TOWN CENTER DOESN'T SEEM TO BE THE GATHERING PLACE FOR A SURROUNDING COMMUNITY LIKE LFP - NO THIRD PLACE BOOKS, GROCERY STORE, LIBRARY, BAKERY, HARDWARE, FARMER'S MARKET SPACE, REAR ESTATE, BAR & GRILL, CITY HALL, ENVIRONMENTAL COMPONENTS (MCALEER AND LYON CREEKS), PEDS, AND MULTIMODAL CONNECTIVITY. THE VISION DOCUMENT HAS PHOTOS OF TOWN CENTER REDEVELOPMENTS IN ATLANTA, DOWNTOWN BOTHELL WASHINGTON PARK (NEW YORK CITY), BOULDER CO ^{#2} UNIVERSITY VILLAGE, GLENWOOD OR, AND MILL CREEK WA THAT ARE MORE COMPARABLE TO THE LFP ~~TO~~ TOWN CENTER CHARACTER.

RETRAINING AND INCORPORATING THIRD PLACE BOOKS AS A GATHERING PLACE NEEDS MUCH MORE PLANNING. SEVERAL COMMENTS STATED THAT IT WOULD BE LOCATED ON TOP OF A PARKING GARAGE, I CAN REMEMBER LISTENING TO CHRISTOPHER KIMBALL (AMERICA'S TEST KITCHEN) SPEAK A FEW YEARS AGO IN THIRD PLACE BOOKS. I DON'T THINK HE'D WANT TO TALK FROM THE TOP OF A PARKING GARAGE.

THE OPEN SPACE AREA NEEDS MORE PLANNING. ONE SPEAKER RECOMMENDED THINKING OUTSIDE THE BOX BY CONSIDERING WHAT MANY EUROPEAN TOWNS DO BY HAVING A CENTRAL TOWN SQUARE.

THE TRANSPORTATION ANALYSIS NEEDS TO BE EXPANDED BEYOND THE SIX INTERSECTIONS. AS SOMEONE MENTIONED, WHAT ABOUT BACK-UPS INTO NEIGHBORHOODS BY VEHICLES USING THE BACK ROADS? I'VE HEARD A ROUNDABOUT IS A POSSIBILITY AT ONE INTERSECTION THAT INCLUDES SR 104. WAS THAT MODELED?

Submit your comments at this public hearing or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155; sbennett@ci.lake-forest-park.wa.us. Oral comments recorded at tonight's meeting will also be part of the public record on the DEIS.

THANK YOU FOR ALLOWING ME TO COMMENT;

STEVE LEMMONS

19010 34th AVE NE

LAKE FOREST PARK, WA 98155

LAKE FOREST PARK TOWN CENTER PLAN
NON-PROJECT EIS SCOPING COMMENT FORM



Please use this form to comment on the range of alternatives and elements proposed for analysis in the Non-Project Environmental Impact Statement (EIS) for the Town Center Plan

Provide input on the elements listed for analysis in the EIS (box below). Which elements are most important to you and why?

Are there other elements that should be analyzed? PROJECT NEEDS TO SLOW DOWN - MORE TIME

1] 3] NEED FOR POWER REVIEW. 2] TRAFFIC ISSUES ARE A CONCERN AS FIRST ZONING SHOULD NOT CHANGE. MAX # OF APARTMENTS SHOULD BE 350 AS 5] ALT ONE ~~SHOULD~~ SHOULD BE REDUCED TO 350 BUT 243 ARE NOT ACCEPTABLE

EIS ANALYSIS ELEMENTS:

- » Town Center Environment and Natural Features
 - » Lyon Creek
 - » Existing Trees and Vegetation
 - » Stormwater runoff
 - » Water quality
- » Consistency with Adopted Plans/Policies
- » Planning and Development Land Use Regulations
 - » Transportation and Parking (Traffic Circulation; Access by All Modes)
 - » Public Services (Police, Fire, Schools, Community Services)
 - » Utilities (Water, Sewer, Stormwater Management Facilities, Energy)

What potential impacts are you most concerned about with the possibility of Town Center redevelopment in the future? INCREASED TRAFFIC IS NOT ACCEPTABLE. OBSTRUCTION OF WETLANDS IS NOT ACCEPTABLE.

What mitigation measures should be considered to address these potential impacts?

Limit Development to 350 UNITS.

Any other comments? The process that the LFP city council has taken to get us to this point needs to be explained. We are concerned that some of the city council members do not have the community preservation as the number one reason they were elected.

Submit your comments at this public meeting or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155; sbennett@ci.lake-forest-park.wa.us. You may also provide comments online at www.yourlfp.com -check out the Get Involved page and other information about the Town Center Plan and providing your comments on scoping.

NON-PROJECT EIS SCOPING COMMENT FORM

Please use this form to comment on the range of alternatives and elements proposed for analysis in the Non-Project Environmental Impact Statement (EIS) for the Town Center Plan

Provide input on the elements listed for analysis in the EIS (box below). Which elements are most important to you and why? Are there other elements that should be analyzed?

and the zoning should not change. Our Town Center cannot handle parking and traffic for anything larger than #1. I believe there could be a smaller minimum of apartments - 300 apartments

EIS ANALYSIS ELEMENTS:

- Town Center Environment and Natural Features
 - Lyon Creek
 - Existing Trees and Vegetation
 - Stormwater runoff
 - Water quality
- Consistency with Adopted Plans/Policies
- Planning and Development Land Use Regulations
- Transportation and Parking (Traffic Circulation, Access by All Modes)
- Public Services (Police, Fire, Schools, Community Services)
- Utilities (Water, Sewer, Stormwater Management Facilities, Energy)

What potential impacts are you most concerned about with the possibility of Town Center redevelopment in the future?

Parking for a development with 1200 apartments. Where would they park and would it spill into the surrounding neighborhood?

What mitigation measures should be considered to address these potential impacts?

It would be good to have more green space for the people in the apartments and the community. More apartments means very little green space.
 Any other comments? Traffic near the Center is already backed up during peak periods. It does not seem feasible to add a high density proposal that traffic would not be a big impact.

LAKE FOREST PARK TOWN CENTER PLAN
DRAFT EIS COMMENT FORM



Please use this form to comment on the Non-Project
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

ALTERNATIVE 1 - CURRENT ZONING IS SUFFICIENT!

JUST CAN'T BELIEVE WE ARE HERE AGAIN - JUST
LIKE ~~THE~~ WITH THE TREES!! DO YOU CARE MORE ABOUT
DENIGRERS? OBVIOUSLY YES. HOW ABOUT WORKING FOR THE RESIDENTS?

THIS IS LAKE FOREST PARK.

GET WITH THE REASON WHY WE LIVE HERE!

- STOP + LISTEN -

- THOSE FRACK: 46TH AVENUE: LFP



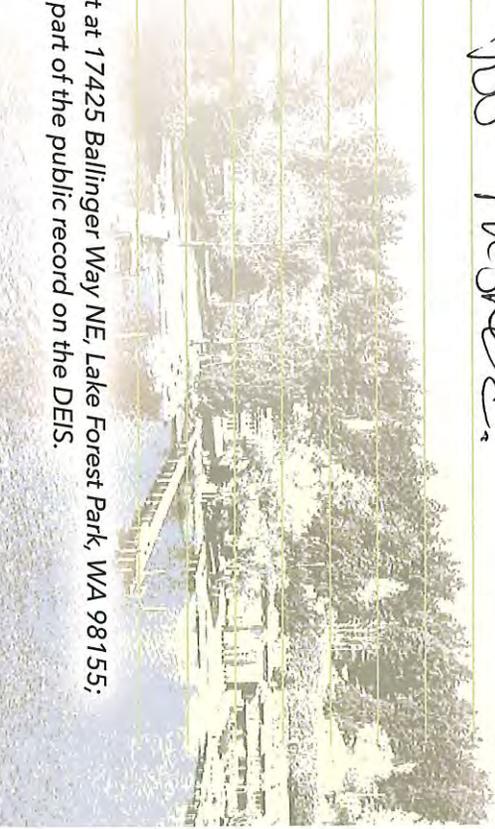
Submit your comments at this public hearing or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155;
sbennett@ci.lake-forest-park.wa.us. Oral comments recorded at tonight's meeting will also be part of the public record on the DEIS.

DRAFT EIS COMMENT FORM

Please use this form to comment on the Non-Project
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

I'm very concerned that the DEIS statement does not reflect what the visioning project by our citizens wanted. The traffic, effect on infrastructure, would be more than this area can sustain.

The Town Center should be a place where our community can gather and horsing is secondary. The process is way too rushed. I am opposed.



LAKE FOREST PARK TOWN CENTER PLAN DRAFT EIS COMMENT FORM



Please use this form to comment on the Non-Project
Draft Environmental Impact Statement (DEIS) for the Town Center Plan

I suggest you remember this a TOWN center. Notes
"development" for maximum housing.

I like the Alternatives with the proviso
that you continue to emphasize different heights, shapes
of buildings incorporated in building design,
and exposing of underlying natural features, use of solar energy etc

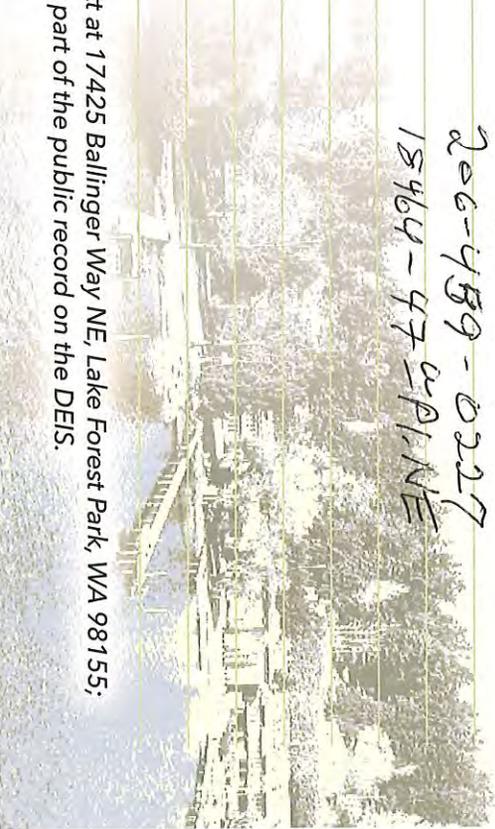
I suggest you ASK what is the actual INTENTIONAL
of this plan? So that you reflect the purpose
of this piece of land in the decision. I believe
the intention should be that it is the center, commons
of LFP a town of 13000 people.

Ann Staller

206-459-0227

15464-47 2P1/NE

Submit your comments at this public hearing or you may also mail or email them to Steve Bennett at 17425 Ballinger Way NE, Lake Forest Park, WA 98155;
sbennett@ci.lake-forest-park.wa.us. Oral comments recorded at tonight's meeting will also be part of the public record on the DEIS.



TO: Steve Bennett, Planning and Building Director
City of Lake Forest Park

FROM: Paul Cronin
Doug Mitchell
Jean Robbins
Bart Shilvock
Julie Wheatley

DATE: Jan. 24 2019

SUBJ: Comments on DEIS for the Town Center Plan



We, the undersigned, would like to provide this formal comment letter on the Draft Environmental Impact Statement for the Town Center Plan, dated Jan. 2, 2019. All of the signers of this letter served on the Mayor's Task Force for the Town Center Vision Document, which was published in May 2018.

First, we would like to reiterate our appreciation for the work of Mandi Roberts and her team at Otak for their work on the Vision Document. We were all pleased with both the process that led to the document and the Vision Document itself.

However, we feel that the DEIS under review diverges quite significantly from the Vision Document in terms of goals and priorities. We believe that the DEIS does not accurately reflect the wishes and opinions of the hundreds of citizens of Lake Forest Park who contributed to the Vision Document by participating in the community outreach programs which were the original source of the core goals and priorities expressed in the Vision Document. This belief was reinforced by the near-unanimous negative response to the content of the DEIS and the accelerated timeline for approval expressed during the January 15, 2019 LFP Public Hearing.

Critical issues in which the DEIS diverges from the Vision Document

We are concerned that the following issues in the DEIS represent significant deviations from the Vision Document:

- **Housing**

The numbers of housing units in all three alternatives in the DEIS (700, 1200, and 1500) are quite surprising to us. There was nothing in the Vision Document that suggested any numbers approaching such high density development, and none of us recall seeing, reading, or hearing anything in any of the public outreach meetings or in the meetings of the Vision Task Force which would have suggested such numbers.

The Vision Document did address housing in the section entitled "Mixed Use Redevelopment", on page 39. The sole stated goal for this section is:

GOAL TC-17. Encourage a pedestrian-friendly mix of commercial, recreational, civic, and residential uses in the Town Center.

Policies stated to achieve this goal included:

POLICY TC-17.1. Adopt development regulations that encourage a variety and mix of housing types for the entire community. Special attention should be paid to seniors, young families, and workforce housing. Expand housing choices and encourage the development of affordable housing options integrated with market rate housing.

POLICY TC-17.3. Create a program of development incentives to encourage the provision of senior living and affordable housing units.

This goal and these policies do not constitute endorsement of development of 1500 housing units. We strongly believe that a proposal that even considers 1200 or 1500 housing units at Town Center is profoundly at odds with both the goals and policies in the Vision Document. We also believe that such a proposal fails to acknowledge the opinions and desires of the citizens who participated in the outreach events which were the basis of the Vision Document.

- **Open Space**

Page 39 of the Vision Document, entitled “Town Center Character” deals with open spaces in the proposed Town Center. For example:

POLICY TC-18.1. The design of infrastructure such as public and private streets, utilities, sidewalks, trails, and open spaces should consider the sequential visual experience upon entering the site and passing through the site.

POLICY TC-18.4. Development should include interconnected parks, plazas, trails, and open spaces throughout the Town Center.

POLICY TC-18.5. Update, expand, and adopt Town Center specific development standards and design guidelines consistent with this vision and that, at a minimum, address the following:

- Creating a network and hierarchy of interconnected open spaces throughout the Town Center.

Examination of Alternatives 2 and 3 in the DEIS reveals nowhere near the prioritization of functional indoor and outdoor open space that is expressed in the Vision Document. Indeed, a look at Figures 2.2 and 2.3 of the DEIS (Chap. 2, pages 16, 17) shows very little open space at all, unless you count driveways and sidewalks, which – we assure the readers of this comment letter – was not the intent of the Vision Document.

- **Transition from High-Density Development to Single Family Residences**

Policy TC-18.5, on Chap. 4, pages 39-40 of the Vision Document, discusses development standards and guidelines which, among other things, include:

Providing for transitions between higher-density commercial and residential uses and low-density established neighborhoods

The impetus for that policy was because of the impact of both shadowing and noise on the surrounding neighborhood. Note that the DEIS makes no reference at all to any noise analysis; we believe that this is a deficiency, and needs to be addressed in the Final EIS.

Please refer to the drawings on Chap. 4, pages 30 through 32 of the DEIS. These clearly show no transition at all (e.g. “wedding cake” tiered construction to address issues of shadowing and noise) between buildings of 6 or 7 stories and the single family residences on 44th Ave. NE, to the west of the project site. This is unacceptable.

- **Native Vegetation**

Page 30 of the Vision Document states this goal:

GOAL TC-8. Incorporate Lyon Creek, scenic views, and other natural features within and adjacent to the site as public amenities and protect them as environmental resources.

Which is to be implemented by, among others, this policy:

POLICY TC-8.1. Development should emphasize the scenic, forested setting of Lake Forest Park, and should protect mature or native vegetation wherever possible.

Although the DEIS does contain this reference to native plants, on Chap. 4, page 160:

Increasing the tree canopy and the use of native plants across the site as part of new landscaping should be encouraged.

It is difficult to see where exactly the tree canopy could be increased in the DEIS drawings showing Alternatives 2 and 3. Those alternatives show almost the entire site being covered with buildings, or roads, or sidewalks. Where would the native tree canopy be located? This is blatant disregard for the desires expressed by the hundreds of citizens who participated in the development of the Vision Document. Alternatives 2 and 3 are not acceptable.

- **Sustainability**

Page 17 of the Vision Document discusses Sustainability. According to public outreach, this means:

- A community that cares about the environment—placing an emphasis on preservation, enhancement, and beautification
- A setting that represents the name of our community “Lake Forest Park”

Some aspects of the “Vision for the Future” in the context of Sustainability are (also from page 17):

- More trees – expand the tree canopy at Town Center
- Native plantings and rain gardens

None of these expressions of the Vision for the Future for sustainability are present in any of the Alternatives in the DEIS. Alternatives 2 and 3, in particular, provide for little or no more tree canopy at Town Center than there already is. There is no mention of rain gardens the DEIS outside of a references to an existing projects on Chap. 3, page 28-29.

Conflict with the 2015 Lake Forest Park Comprehensive Plan

The Comprehensive plan is the “basis for the City’s regulations, and guides future decision-making” (LFP 2015 Comprehensive Plan, page 5). The most recent version of the Comp Plan, which was written in 2015 and adopted by City Council on Jan. 14, 2016, specifies a growth target of 551 housing units, city-wide, over the time period of 2015-2035 (Comp Plan, page 103). The developments proposed in the DEIS specify 700, 1200, and 1500 housing units in Town Center alone for the three Alternatives. Like the Comp Plan, the DEIS is intended to cover a period of up to 20 years (DEIS, Chap. 2, page 1). The numbers in the DEIS and in the Comp Plan are seriously divergent. There is simply no justification given in the DEIS for overriding the housing targets specified in the Comp Plan. The Comp Plan is official City Policy as specified by RCW 36.70A.070. The housing targets in the DEIS are in violation of the 2015 Comprehensive Plan and give citizens a false choice in terms of real low, medium, and high alternatives that align with community needs based on real King County studies, not enhancing a business case for a developer.

Additional Concerns

- 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. Page 4 of the Vision Document states that “Groundwater levels are shallow in some portions of the site (approximately four to twelve feet below the surface)”. This will certainly have a significant impact on what kind of construction would be feasible on the site, particularly if some parking would be built underground (DEIS, Chap. 2 page 9; Chap. 2 page 14). The DEIS should discuss this problem in more detail and it needs to be analyzed before a Final EIS is signed. DEIS Chap. 4, page 42 acknowledges the potential for shallow groundwater, but the entire plan for parking (and perhaps later commercial development) falls apart if groundwater issues are too costly or technically challenging for the developer to mitigate. This is a significant risk that has not been addressed.
- The number of levels (floors) for Alternatives 2 and 3 is not specified anywhere in the DEIS. The DEIS says that Alternative 1 has up to five levels (DEIS Chap. 2 page 7). The heights, in feet, for Alternative 2 and 3 are given on Chap. 2 page 10, but no number of levels is specified for these Alternatives. In the interest of clarity and transparency, the number of levels should be clearly stated for all Alternatives, as well as the maximum height from the floor of the top floor to the top of the structure.
- Assurance was given by Otak at the public hearing on Jan. 16 that traffic studies have shown that none of the Alternatives in the DEIS would have a significant impact on the traffic at the intersection of Routes 104 and 522. The DEIS claims this as well, in Table 4.5.3 (Chap. 4 page 85) and Table 4.5.5 (Chap. 4 page 93). Frankly, these claims strain credibility. For the record, none of the authors of this

comment letter believe these claims. We believe that anyone who has attempted to go north on Bothell Way from anywhere in Town Center at 5:00PM would agree that adding several hundred parking spaces and up to 1500 additional housing units to Town Center would cause traffic to be negatively impacted. The claim of “less traffic congestion on highways and arterials and environmental benefits such as...” (DEIS Chap. 4, page 19) is pure marketing, and not based on analysis or grounding in reality.

- 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 (page 19). Why was this number of units not used as one of the Alternatives in the DEIS? And more importantly, where exactly did the numbers 700, 1200, and 1500 housing units (for Alternatives 1, 2, and 3) come from? The DEIS fails to adequately describe the methodology used derive and justify these numbers. As far as most of the citizens of LFP are concerned, these numbers were pure fabrications. They certainly had no basis in either the Vision Document or the 2005 Town Center study. The DEIS should have an extensive detailed discussion as to how these housing unit numbers were derived.

Recommendations

We make the following recommendations for revising the DEIS.

- The alternatives presented in the DEIS should contain reasonable housing numbers. Certainly the housing numbers should not exceed the housing target in the 2015 Comp Plan (551) without rigorous justification.
- The timeline for the process involved in the EIS and the City code updates resulting from its adoption is currently unreasonably rushed. We are trying to push code changes through in a month for a project the City Council claims will take 15-20 years to develop, and we know will impact our community for 50 years or more. To proceed in this way brings significant risk to realizing the Vision of the community.
- We understand that the Planning Commission has been prevented from providing formal input into the review of the DEIS. This is unreasonable, unwise, unnecessary, and likely something that could be challenged legally. “As citizen representatives, commissioners recommend programs and policies according to needs and values of the community. The Planning Commission is required by law and is governed by state statute and city ordinance.” (from City of LFP website). Nowhere in the state statute or city ordinance does it say they can be left out of the process at the decision of the City Council or Mayor to comply with a tight Sound Transit 3 schedule. The Planning Commission is well qualified to review this document and needs to be a part of the process to provide written comments and to represent the citizens. Indeed, the Vision Document specifies that the Planning Commission was to be included in the discussion and review process (page 44).
- We understand that there is urgency in getting regulations in place to accommodate the coming ST3 parking garage in a way that is acceptable to the community. However, there is no such urgency associated with the redevelopment of the rest of Town Center. The property owner, Merlone Geier, has not expressed any plans to even study redevelopment, at least not publicly. We recommend that the City separate the study of code changes for the ST3 parking garage from all matters related to the

rest of Town Center redevelopment. This would allow for proper analysis and review of an updated DEIS. The public accepts and supports the concept of a parking garage paid for by Sound Transit. The location seems to be identified. Focus on this aspect, take pressure off of yourselves and the consultant, and spend the necessary time to study real alternatives in the level of detail and openness that will help ensure that what will be built represents community needs, interests, and values well into this century.

Thank you for your attention.

Paul Cronin

Doug Mitchell

Bart Shilcock

Julie Wheatley

Jean Robbins (As approved by telephone authorization)

Documents referenced in this letter:

- “Draft Environmental Impact Statement for the Town Center Plan”
Issued Jan. 2 2019
http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/full_town_center_plan_deis_january_2nd.pdf
- “Lake Forest Town Center: The Vision”
Issued May 21 2018
http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/vision_document_final_draft.pdf
- “Lake Forest Park 2015 Comprehensive Plan Update”
Adopted Jan. 14 2015
<https://www.cityofflp.com/160/Lake-Forest-Park-Comprehensive-Plan>
- “Sustaining a Livable Lake Forest Park: The Future of Town Center”
Published Oct. 18, 2004
<http://www.yourlakeforestpark.com/uploads/1/1/5/5/115517941/sustaining-livable-lfp-town-center-report.pdf>