

**From:** "Bill Dickerson" <bill@evatree.com>  
**To:** <MunicipalJailSEPA@Seattle.gov>  
**Date:** 1/29/2009 8:20 PM  
**Subject:** NEC EIS Scoping Comments  
**Attachments:** FINAL\_BALNA\_Comments\_January\_27.pdf; NoShorelineJail NEC EIS Scoping Comments.pdf

Diane Sugimura  
Director of Department of Planning and Development  
c/o Andy Ishizaki  
NEC Regional Municipal Jail EIS  
700 5th Avenue, Suite 5200  
P.O. Box 94689  
Seattle, WA 98124-4689

RE: Comments on Scope of North and East Cities Regional Municipal Jail EIS

Dear Ms. Sugimura:

Attached as PDF files are:

- 1) NoShorelineJail.org's comment letter in endorsement of
- 2) Ballinger Neighborhood's Association's (BALNA) official public comment response to the Determination and Significance and Request for Comments on Scope of DEIS, published December 18, 2008.

Sincerely,

Bill Dickerson  
NoShorelineJail.org  
3017 NE 201st PL  
Lake Forest Park, WA 98155  
206-985-0831

January 26, 2009



Diane Sugimura  
Director of Department of Planning and Development  
c/o Andy Ishizaki  
NEC Regional Municipal Jail EIS  
700 5th Avenue, Suite 5200  
P.O. Box 94689  
Seattle, WA 98124-4689



RE: Ballinger Neighborhood Comments on Scope of  
North and East Cities Regional Municipal Jail EIS

Dear Ms. Sugimura:

Attached is Ballinger Neighborhood Association's official public comment response to the Determination of Significance and Request for Comments on Scope of DEIS, published December 18, 2008.

Shoreline, Washington  
Ballinger Neighborhood Association  
is a member of the Council of Neighborhoods  
sponsored by the City of Shoreline

By way of this comment letter, we also request to be made a formal party of record for this proceeding. Please mail all future meeting notices or decisions related to this proposed project to the association at address on the letterhead below. Where appropriate, we have also included data that is pertinent to the DEIS analysis. Please feel free to contact us if you have any questions about the information provided herein.

Ballinger Neighborhood Association (BALNA) is a non-profit organization registered with the State of Washington. BALNA serves neighbors in the northeast corner of the city of Shoreline. We also welcome the participation of our nearby neighbors of Mountlake Terrace and Lake Forest Park, who share common interests in our neighborhood's activities and events. Our mission statement best describes the motives of our organization: *[We exist] solely to benefit citizens of our community. We seek to capture the best of community life. Believing that neighbors need neighbors, we embrace our urban diversity, and all who call Ballinger Neighborhood "home." We connect neighbors who share similar interests and passions by creating opportunities to gather.*

BALNA has focused its effort on helping neighbors to understand the jail selection process and to help neighbors translate their concerns into actions appropriate to the EIS process. Earlier this month, BALNA held two information meetings and a submittal writing workshop. The attached document is the result of the combined efforts of the many citizens who participated in that process. **We strongly urge you to consider these comments in your final determination of the Elements of the Environment to be considered in the Draft EIS phase.**

During the Draft EIS phase, BALNA will continue to gather and quantify detailed information about the neighborhood, to assure that North / East Cities Municipal Jail Planning team is fully informed prior to making its final decision on the suitability of the Aldercrest Annex site. BALNA will also continue to be a conduit of information through continued neighborhood meetings and our website at [www.ballingerneighborhood.org](http://www.ballingerneighborhood.org), which contains links to the North / East Cities Municipal Jail Planning website, research studies on jails across the country, and ongoing commentary from neighbors.

Sincerely,

Londa P. Jacques, Chair  
Ballinger Neighborhood Association

cc: Shoreline City Manager; Shoreline City Council

## Overview

This document summarizes the concerns and recommendations expressed by an overwhelming number of citizens in the Ballinger neighborhood of Shoreline, Washington, as compiled by the Ballinger Neighborhood Association (BALNA). The Shoreline Council of Neighborhoods was chartered in 1996 as a result of the Shoreline City Council's belief in the value of citizen participation through formal neighborhood organizations as an integral part of its service to the community. City Council Resolution 54 established the Council of Neighborhoods with a mission to promote interaction, communication and fellowship within the City of Shoreline.

We begin with a summary of the critical issues that pertain to this site followed by specific comments on each of the Elements of the Environment that were distributed by the EIS consulting group, beginning with Land and Shoreline Use and Recreation.

The Shoreline Aldercrest Annex site (hereinafter, Shoreline site), also known by residents as the old Kellogg school site, is not an abandoned school. To residents of this neighborhood and many who live some distance away, it is a heavily used recreational site. This is a large green space with a baseball diamond, tennis court and quarter mile track where the infield is used as a soccer field. To live in this neighborhood is to see and hear children and adults playing soccer, baseball, cricket, sledding, flying kites and model airplanes, running track and walking dogs.

Our neighborhood is deeply concerned about the loss of such an important asset to the community. **How could this green space and recreational space ever be replaced?** With schools, churches, a mosque and many residences in the immediate vicinity, green space is a treasure that contributes to the livability and the health of the community. The Shoreline site will be especially negatively impacted since its immediate surroundings are entirely residential in character.

In the following pages, we highlight the issues that the Draft Environmental Impact Statement (DEIS) needs to consider. We have organized them according to the Elements of the Environment sheet that was distributed by the Northeast Cities Municipal Jail planning group (NEC), beginning with Land and Shoreline Use and Recreation because the proposed scoping needs to be expanded to include these dimensions. We call particular attention to expanding the scope in the following areas:

- Residential neighborhoods. The National Institute of Corrections states that jails should not be located in residential areas. Note that the City of Seattle eliminated any residential sites from any consideration in their initial list of 35 sites. The Shoreline site is 95% residential within one-quarter mile of the site as compared to 30% residential at most in any of the other sites. Seventy percent of the Shoreline jail site boundary is directly adjacent to residential property, whereas none of the other locations share a parcel boundary with a residential parcel. The impact on the character of the community must be considered in addition to the impact on residential property values.
- Urban green space. The Shoreline space is an open urban green space that is irreplaceable once eliminated. It was ironically selected as a potential site because it was undeveloped. Beyond the moral reasons to preserve this space, research suggests that housing values will

be negatively impacted (over \$10 million based on rough estimates discussed here) and cannot be mitigated.

- Non-compatibility with surrounding land use. The Shoreline site will be next to two active schools, two religious centers including a Bosnian mosque with several attendees who have expressed concerns that the jail will remind them of experiences in jails and concentration camps during the Bosnian war.
- Recreation. The Shoreline site has served as a de facto neighborhood park for many years and the impact of its elimination must be carefully considered.
- Safety. Because the Shoreline site is in a residential neighborhood, children regularly use the area. Any jail site would need to include mitigation to address these concerns including among other things: the release of inmates in their city of origin, the costs to transport jail residents to/from the facility, increased crime rates in the local area.
- Transportation Costs. The impact of increased traffic that will require expanding existing roadways (including expanding Ballinger Way to a 4-lane road to Bothell), traffic regulation, and the construction of sidewalks throughout the surrounding neighborhood.

The specific factors that should be included in the DEIS are provided on the following sections.

## Land and Shoreline Use

The DEIS analysis will need to reflect the elements that will have a particularly negative impact if the jail is sited within a residential neighborhood. We suggest that the DEIS should conclude that any site that is greater than 25% residential within a 1/4 mile should be removed from further consideration.

In this category, the DEIS needs to consider the following elements:

- The impact on locating a jail next to a residential neighborhood
- The impact of removing urban green space
- The impact of the jail on residential property values within one-quarter mile
- Non-compatibility with surrounding land use

These elements are described in more detail in the following paragraphs.

**The impact on locating a jail next to a residential neighborhood.** Locating a jail next to a residential site should remove the Shoreline site from further consideration. The National Institute of Corrections states in their jail design guidance:

*It is important that the jail be located in appropriate surroundings... The best locations are in government, light*

*industrial or commercial areas. In general, the jail should not be near a school, a housing area, a church, or a recreation area.*<sup>1</sup>

Even the City of Seattle applied this guidance in their site selection criteria:

*Seattle initially reviewed 35 potential sites for a low-rise municipal jail. The list included sites that were: Not located in residential zones; Had easy access to arterials; and Already several acres in size or could be assembled from adjacent properties.*<sup>2</sup>

Note that these were the criteria to select sites for the City of Seattle's initial list! It is unconscionable to eliminate as a matter of policy all residential neighborhoods within Seattle (who will provide the majority of the misdemeanants), but locate a jail in a residential zone in one of the surrounding cities. The Shoreline site should be dropped from the list for this reason alone.

The DEIS analysis should collect data on the number children that live within ¼, ½ and 1 mile of each site. At the Shoreline site, this analysis must span portions of Shoreline, Lake Forest Park, and Mountlake Terrace.

**The impact of removing urban green space.** Any DEIS should consider the potential removal of urban green space as one of their primary considerations. The DEIS must consider the removal of urban green space as a critical factor (particularly when the green space is within a residential neighborhood).

A review of research over the past two decades estimates that residential properties abutting or fronting passive parks and green space benefit from a 20% increase in property values.<sup>3</sup> Therefore, replacing the green space with a jail facility would decrease residential property values by at least the same proportion, in addition to further reductions associated with the jail itself. A study of the impact of urban green space of Portland, OR parks suggested that property values were significantly impacted up to 1500 feet (approximately ¼ mile) from the park.<sup>4</sup> A study completed by the Office of Planning in Seattle, Washington, for the 12-mile Burke-Gilman trail revealed that property adjacent to the trail sells for an average of 6 percent more than otherwise comparable properties.<sup>5</sup>

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<sup>1</sup>National Institute of Corrections. (1998). *Jail design guide: A resource for small and medium-sized jails*. U.S. Department of Justice, p. 3-8.. Downloaded from: <http://nicic.gov/Library/015061>

<sup>2</sup>City of Seattle Municipal Jail Planning Project – Site Selection. Downloaded from <http://www.seattle.gov/MUNICIPALJAIL/SiteSelection.htm>.

<sup>3</sup>Crompton, John L. (2005). The impact of parks on property values: Empirical evidence from the past two decades in the United States. *Managing Leisure*, 10, 203-28. See also Crompton, John L. (2004). *The Proximate Principle: The Impact of Parks, Open Space and Water Features on Residential Property Values and the Property Tax Base (2nd ed.)*. National Recreation and Park Association.

<sup>4</sup>Bolitzer, B., & Netusil, N.R. (2000). The impact of open spaces on property values in Portland, Oregon. *Journal of Environmental Management*, 59, 185-193.

<sup>5</sup>Seattle Office for Planning (May 1987). Evaluation of Burke-Gilman Trail's Effect on Property Values and Crime. Seattle, WA: Seattle Office for Planning.

For example, the following table provides a rough estimate of the impact on residential housing if the current urban green space is replaced by a jail. This is a *conservative* estimate and doesn't include the impact to apartments, church, school, or other housing land values. The DEIS analysis needs to accurately quantify all of these numbers and factor the cost into their siting decision. It is important to note that these costs cannot be mitigated.

Residence Type	# of Residences (rough estimates)	Decrease in Value with Removal of Urban Green Space	Average Housing Price (estimated <sup>6</sup> )	Estimated Impact on Housing Values
Single family homes within proposed jail block	50	20%	\$340,000	-\$3.4 Million
Single family homes within 1/4 mile of the urban green space	350	5%	\$340,000	-\$6 Million

Furthermore, the City of Shoreline already has a significantly lower percentage of park space compared to other cities. A common measure of the level of service provided by parks is “number of park acres per 1,000 residents”. As the table below demonstrates, Shoreline ranks dead last among these northwest cities of similar size. The jail would eliminate urban green space that can never be recovered.

City	Population	City Area (sq miles)	Parks & Open space (acres)	Park acres per 1,000 people	Acres of Parks per total city acres
Shoreline	53,025	11.7	363.2	6.8	4.9%
Renton	78,780	22.3	732	9.3	5.1%
Tacoma	193,556	62.6	1792	9.3	4.5%
Kirkland	45,054	11	458	10.2	6.5%
Seattle	594,210	142.5	6200	10.4	6.8%
Everett	91,488	32.5	1600	17.5	7.7%
Spokane	198,081	58.5	3500	17.7	9.3%
Bellevue	117,000	33.9	2343	20.0	10.8%
Redmond	51,530	16.6	1133	22.0	10.7%
Bellingham	75,150	31.7	2718.1	36.2	13.4%
Issaquah	11,982	8.4	1160	96.8	21.6%

<sup>6</sup> Estimate from Zillow.com on 1/17/09

**The impact of the jail on residential property values within one-quarter mile.** The NEC has repeatedly cited the 1987 FAU-FIU Government Center of the Florida International University as evidence that jails do not decrease surrounding property values. The DEIS team cannot rely on this study. The document itself is not a study, but rather a synopsis of a study that provides insufficient detail to evaluate the merits of the conclusions. However, we note that the sites evaluated in the study were located “within one to two miles of residential areas”<sup>7</sup>. From all indications, none were located right in the midst of residential parcels. In addition, the study compared impacts to property values within ‘target’ and ‘control’ sites, described as follows:

*For each facility, the study defined a target area and a control area. The target area was defined by a circle, several miles in diameter, drawn using the facility as its center. The control area had comparable demographic features with one exception: no correctional facility [emphasis added].*

And,

*Realtors were asked to compare sales activity, property values, and buyer concerns within a three-mile radius of the correctional facility with those from an area located farther from the facility [emphasis added].*

Clearly, this study provides little insight into how a facility located in the heart of a residential neighborhood would affect the property values of adjoining single- and multi-family homes, as well as other residences within a short distance of the site.

The DEIS needs to investigate the impact on residential property values on jails that are sited within existing residential neighborhoods. Jail siting studies have only looked at the impact on housing values on non-residential sites or locating correctional facilities in small, declining, rural towns.

**Non-compatibility with surrounding land use.** The DEIS must include the project’s compatibility with surrounding land use and consistency with existing city comprehensive plans and regulations. The Shoreline site at 2545 NE 200th is currently zoned low density, single family residential (R6), contains an unused school facility, and sits squarely within an area zoned residential. Seventy percent of the Shoreline jail site boundary is directly adjacent to residential property with plans to put more houses on a property adjacent to the Shoreline jail site (reference Short Plat #SHSP2008-05/201746 subdivision of one parcel into three at 2902 NE 196th Street).

There are two active schools across the street from the proposed site – one public and one private school and another public elementary school just one mile away.

The presence of a jail would likely trigger a need for associated businesses, such as bail bondsmen. This would represent a drastic, negative change in the business environment of the

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<sup>7</sup> The study summarized at: [http://www.seattle.gov/municipaljail/docs/DOJ\\_study\\_010591.pdf](http://www.seattle.gov/municipaljail/docs/DOJ_study_010591.pdf)

Ballinger Neighborhood. The DEIS must analyze the impacts to the commercial character of the Ballinger Way business district.

The DEIS must study the impact of the large jail facility to the surrounding community and the impact to the character of the neighborhood. It is important the facility fits into the city's plans such that the public accepts the facility and future planning issues regarding the facility and surrounding areas are avoided.

## Recreation

**The Shoreline site is a heavily used recreational site.** This is a large green space with a baseball diamond, tennis court, quarter mile track and soccer field. The space is used both informally by children and adults playing soccer, baseball, cricket, sledding, flying kites, model airplanes, running track and walking dogs, and formally by organized sports groups for soccer, baseball, and basketball. For example, the Shorelake Soccer Club uses the fields for several different age groups with roughly 8 game times per weekend and 2 active fields per time slot. This amounts to 16 games per weekend, with an average of 10 players per team and 2 teams per game, for a total of approximately 320 children per weekend served by these fields.

The facilities are also used informally by people in the neighborhood, especially children. During the recent snowstorm, the park was used from 5 am to 11 pm for sledding by up to 50 people at a time. During the summer, the track and field are regularly used for recreation and exercise. Alternative sites for these activities are located beyond the neighborhood. The nearest site in Shoreline with similar amenities is 40 blocks away.

The DEIS evaluation needs to consider the **positive** impact of the current space. The recreational facilities at the Shoreline site help to build a healthy neighborhood and healthy kids.

## Earth

In addition to the existing elements identified (geology, soils, topography, unique physical features, erosion), the DEIS must study the geology and soil in the area and specifically any erosion caused by increased storm water run-off due to **diminished pervious area** when a large facility with a parking lot is constructed in an area previously an open space.

As noted in the previous section, the jail would replace urban green space, with a direct impact on land. This would not be consistent with Shoreline's sustainability plan.

## Air

Since the NEC Municipal Jail Project is planning to build a very large facility (255,000 sq. ft. with parking for 200 cars), the increased emissions from the traffic must be studied. Countless cars, diesel trucks, buses, vendors, attorneys, inmates' families, etc., would be coming and going throughout the day. The DEIS must reflect the particularly significant **impact this will have on residents who live** nearby the facility.

The DEIS analysis needs to consider the **impact on residents during construction** of the facility. This is particularly a concern at the Shoreline site where over 300 residential houses are within ¼ mile of the site.

## Water

The movement of water in the area must be studied as part of the DEIS. The study should include both **ground water and surface water movement** with mitigations for flooding. At the Shoreline site, there have been floods near 25th Ave NE between 195th and 200th. The lower south-west corner of the site is a low point where water tends to collect. The ground area surrounding the tennis court and the left field of the baseball field is wet from October to May with underground springs and a high water table in the immediate area of the proposed site.

The DEIS must include the **percent of impervious surfaces** that would be *added* and study the impact to the area from that addition. At the Shoreline site, the lower two thirds of the property is grass (pervious). Addition of impervious surfaces to the Shoreline site must be studied for an impact to the Lyon Creek watershed.

In addition, identification of **natural creeks** flowing at or near the study site must be included in the DEIS for purposes of fish and wildlife habitat AND for purposes of identifying/mitigating any increased transportation-related pollution due to an addition of a large facility. Such effluent (such as oil, gasoline, brake lining, etc.) would damage down-stream fish and wildlife. The higher stream flows and pollutants will directly impact Lake Forest Park which is downstream and needs to be mitigated. Very near the Shoreline site, Ballinger Creek flows and empties into Lyon Creek - a salmon-bearing creek. What will be the increase in street and building structure water run-off and its impact to down-stream wildlife?

## Plants & Animals

As an addition to “Plants and Animals” topics, the DEIS must include the impact to **existing trees** with respect to the preservation of any large/older trees growing in the area. At the Shoreline site, there is a strip of green space along the east and south sides of the property which contains large fir and cedar trees. Trees improve the site aesthetics, provide habitat for wildlife, stabilize top-soil, and absorb greenhouse gases such as CO<sub>2</sub> from the air.

In addition to the potential for damaging salmon habitat noted above, other wildlife species in the immediate vicinity include coyotes, hawks, raccoons and blue heron.

## Energy & Natural Resources

The DEIS must include the study of the jail facilities **consumption of natural gas or electricity, or any other fuel sources**. What is the impact to the available energy sources? Is there a potential for the facility to use solar energy?

## Environmental Health

**Noise created by service trucks and cars** in and out of the facility 24 hours per day must be studied for impact to neighboring homes and on the two schools adjacent to the property. Mitigation for the noise due to increase in traffic on the streets must be included and not limited to designating certain streets for jail traffic to use during certain times of the day – particularly for keeping the area quiet for adjacent residential areas.

The DEIS must consider possible risks of **explosion** from bomb threats.

Potential releases to the environment affecting public health which include **infectious diseases**. DEIS *must* include an analysis of the risks for the spread of infectious disease because of the number of people that are housed in the facility in close proximity with one another and in close proximity to a densely populated community surrounding the jail. Outbreaks of such infectious diseases as invasive pneumococcal organisms, methicillin-resistant staphylococcus aureus, and tuberculosis have occurred in such jails as Multnomah County Oregon (2008), Monroe County Pennsylvania (2008), Los Angeles County California (2003/4), and Seminole County Florida (1999).

## Population & Housing

In addition to the impacts to residents identified under the heading of *Land and Shoreline Use*, impacts to the surrounding population with regard to the immediate neighborhood's social character must be addressed.

There are two religious centers near the Shoreline site: the Jehovah's Witness Hall, located just one block away, and a newly built mosque for the Bosnian community across the street. The Bosnian community includes several people who were in concentration camps and jails during the war in Bosnia. They have expressed concerns that the jail across the street will remind them of that war, and what they went through in those camps and jails.

For many residents near the proposed site, 25<sup>th</sup> Ave NE is a primary route for entering and leaving the neighborhood by car and afoot to access shopping and the freeway. A jail is not a suitable entrance to a community.

Directly adjacent to the park, Ballinger Homes, a King County Housing Authority subsidized housing facility, houses families living in one-to five-bedroom units. Onsite, more than 100 children are enrolled in mentoring and English classes, preschool and other educational activities. Represented among these children are 15 primary language groups with families from Europe, East Asia, South Asia, Middle East and Africa. Mentors report that children have already expressed concern about the proposed jail. The distance from the fence at Ballinger Homes to the fence of the school property is less than 250 paces.

The jail would be sited directly across the street from Brugger's Bog Park, which serves as the only Shoreline improved park in Ballinger Neighborhood for passive recreational use, including picnicking, and playground equipment for younger children. Parents with young children bring their toddlers here to play. Teens from nearby Ballinger Homes and other nearby residences, including some "at-risk" youth, use the park regularly as a hang out. Due to its proximity to the

jail site, this park would likely evolve into a passive-use recreational space adjunct to the jail site, frequented by jail staff and visitors. Its social paths, currently shortcuts neighbors use to access shopping and bus transportation along Ballinger Way, would also be heavily used by staff and visitors to the jail. In short, the character of the neighborhood park would be lost to the neighborhood.

Furthermore, due to 24/7 jail operations, the park, which is heavily wooded in some areas, has the potential for harboring illicit activity, such as drug deals or temporary sleeping areas for homeless released misdemeanants, especially after dusk, when the park is closed to the public. The potential for interaction of at-risk youth and illicit activity is high.

## Light & Glare

Because this is a facility that operates 24 hours, 7 days/week, DEIS must include **impact to neighboring homes** particularly homes immediately adjacent to the site property line. The DEIS should include such mitigation as 100 ft or more of buffer around the facility, planting of tall trees as a buffer, fences or walls, elimination of windows on the sides of the facility that face adjacent homes or other such building design aspects.

## Aesthetics

The DEIS must include the proposed structure's height and the impact of the structure to the area's aesthetics. The Shoreline site is currently open space and is used as a park. All surrounding homes will have a **territorial view of the proposed site** including residents farther away at higher elevations. The DEIS must include mitigation actions for this territorial view with respect to the facility's architecture. The DEIS analysis needs to include the **aesthetic impact on houses in Shoreline and Lake Forest Park** that currently look downward on the proposed site.

## Historic & Cultural Preservation

The DEIS must include a report on any historic landmarks or cultural importance that must be preserved and include mitigations to any impact to these landmarks. The Ballinger neighborhood represents a diverse group of neighbors, more so than most neighborhoods. The Ballinger Homes apartments include several residents from other countries and the proposed site is adjacent to a mosque under construction.

## Agricultural Crops

The Ballinger Neighborhood Association has been exploring the potential for a portion of the site to serve as a P-patch.

## Transportation

The DEIS must include a study of the **costs of transportation, community services, and amenities** for the people working at the facility, for the people living in the facility, and for the people visiting the facility.

The DEIS must include a study of **the number and length of vehicular trips required** by the police to transport inmates to and from public services not provided at the jail facility. Since Seattle will have the majority of bed space usage, the distance from downtown Seattle must be studied by the DEIS to minimize transportation cost and time when police need to book people into the jail or move people from one place to another. The DEIS should calculate the cost to transport prisoners to the facility.

Because the Shoreline site is a residential neighborhood, for safety reasons, **inmates should be released in their city of origin**. The DEIS evaluators should also include costs the cost of transportation from the city back to their home city.

As an addition to “Transportation” element, the DEIS must identify existing **school bus routes in the area**, pick-up and drop-off points. 25th Avenue NE is a major road for the Shoreline Public Schools bus routes that serve Lake Forest Park Elementary, Kellogg Middle School and Shorecrest High School. The DEIS must study the impact to such existing educational transportation routes and the safety of school-age children at the pick-up/drop-off locations.

The DEIS must include a study of **existing roads for adequate traffic capacity**. In the Shoreline site, NE 200<sup>th</sup> St. and 25<sup>th</sup> Avenue NE streets are small residential streets. Ballinger Way is a two-lane street. Mitigation for increases in traffic from the activities of a large jail facility must be studied and not limited to using eminent domain to widen small streets to meet traffic demands. **The costs to increase Ballinger Way to a four-lane road to Bothell Way NE should be included**. Even if government employees do not use this route, people visiting the facility and working in the facility will be using it.

One of the streets bordering the Shoreline site, 25th Ave. NE, is used heavily by WSDOT dump trucks & other road service vehicles, Asplundh Tree Service, and many government agencies who use the fueling station at the King County shop. The DEIS should study how the proposed jail entrance will impede their ability to function.

Currently, the safest pedestrian access to Metro bus stop on Ballinger Way requires crossing the street and walking through Brugger's Bog Park. Added pedestrian traffic to this intersection and the fact that 25th Ave NE is used as a commercial truck route despite being a residential street is already a safety hazard. Any additional impacts due to the jail will need to be mitigated.

Because of the number of children living next to the Shoreline site, **sidewalks will need to be built along all streets within a quarter mile** of the site to protect children and pedestrians. For example, school bus routes travel through the neighborhood picking up children along 25th and 30th streets for Shorecrest High School and Lake Forest Park Elementary. Sidewalks will also need to be built from Ballinger Way to Bothell Way NE, and on 205th St. from Ballinger Way to 30th St. to protect pedestrians from increased traffic.

The increased traffic and safety concerns will require **streetlights** on all streets between 205<sup>th</sup> St. and 195<sup>th</sup> St., and between 25<sup>th</sup> St. and 30<sup>th</sup> St.

## **Public Services & Utilities**

The DEIS must include a study of the demands and impacts on the following public services:

**Fire Stations & First-Response Services** – at the Shoreline site, the closest fire station is 2.2 miles away (Northshore Fire District Station #57 in Lake Forest Park). The DEIS *must* include needs of the jail facility for a fire station with a first-response truck within 1 mile of the facility. Because this is a LARGE facility housing potentially 600-700 people with 200 employees, the demands on the area for these services must be mitigated.

**Police** – At the Shoreline site, there are no Police stations nearby. The DEIS must study the need for adding a police station at or near the facility. DEIS must include a study of community safety with respect to the jail facility.

**Schools nearby** – The DEIS must identify schools in the vicinity of the proposed site and study the impact to these institutions. At the Shoreline site there is an active elementary school immediately across the street.

**Parks** – The **DEIS** must identify nearby parks and recreational areas and study the impact to these areas. At the Shoreline site, Bruggers Bog Park is across the street and the proposed Shoreline site is currently used as a recreational area.

**Courthouses or government services** – at the Shoreline site there are no governmental services nearby. The DEIS must identify the jail's need for nearby governmental services – namely a courthouse or other state or county facilities.

**Storm water services** must be included in the DEIS study. At the Shoreline site, current storm water drainage is barely adequate for the water run-off particularly in the corner of 195th and Ballinger Way AND at various points along Ballinger Creek. On several occasions, the City of Shoreline has attempted to fix the cause of flooding in the area of 25th Ave. NE between 200th and 195<sup>th</sup>.

**Services for removal of sewage and waste material** for the jail facility. The DEIS must study the volume of sewage and amount of solid waste that must be carried away by the public utilities. The DEIS study must include an analysis of the required feet of pipe and sewage pump stations to be added or expanded at the site to meet the jail facility needs.

## **Additional Factors**

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### **Demolition of existing building and Construction Phase**

Impact during the demolition and construction phase must be included in the DEIS. In particular the following items must be included in the study:

- Site clearance and preparation

- Plant operation, movement of men and materials on and off site, pilings, drilling, digging
- Waste disposal - spoil, debris, surplus material
- Site effluents and run off
- Air emissions from vehicles and machines
- Emissions of heat, noise, light
- Temporary occupation of and access to worksites
- Temporary storage

In addition to the above the DEIS must **identify any existing structures that must be demolished** and handle any **asbestos or toxic materials** that could endanger the surrounding environment if not contained properly.

## **Safety**

The EIS evaluation should also consider safety issues and costs to mitigate them. Critical issues include:

- **The release of misdemeanants in their city of origin.** As noted above, because the Shoreline site is a residential neighborhood, all misdemeanants should be released in the city of origin, not in the neighborhood. We have special concerns over children's safety.
- **Increased crime rates.** The EIS evaluation should assess if crime rates are likely to increase in the vicinity of a jail facility with special consideration for the impact on a residential neighborhood. This should include the impact of an increase in ancillary businesses that could negatively impact the neighborhood as a result of large facility, crimes committed by associates of inmates who may be waiting in the neighborhood for the inmate's release, and the unlikely but substantial impact of jail escapes into a residential neighborhood.



William Dickerson ▪ 3017 NE 201<sup>st</sup> PL, Lake Forest Park, WA 98155 ▪ 206-985-0831

January 29, 2009

Diane Sugimura  
Director of Department of Planning and Development  
c/o Andy Ishizaki  
NEC Regional Municipal Jail EIS  
700 5th Avenue, Suite 5200  
P.O. Box 94689  
Seattle, WA 98124-4689

RE: Comments on Scope of North and East Cities Regional Municipal Jail EIS

Dear Ms. Sugimura:

Attached are the Ballinger Neighborhood's Association's (BALNA) official public comment response to the Determination and Significance and Request for Comments on Scope of DEIS, published December 18, 2008.

**NoShorelineJail.org fully endorses and supports the attached BALNA EIS scoping comments.** Several of our members helped contribute and draft to the BALNA comments. In order to lessen your work, we have chosen to simply endorse the BALNA comments rather than craft a very similar statement.

By way of this comment letter, NoShorelineJail.org also requests to be made a formal party of legal record for this proceeding. Please mail all future meeting notices or decisions related to this proposed project to the address on the letterhead above. Please feel free to contact us if you have any questions.

As residents of the community living in the vicinity of the proposed municipal jail site at 2545 NE 200<sup>th</sup> ST in Shoreline, we respectfully submit this letter consisting of comments to the NEC Municipal Jail Environmental Impact Statement (EIS) Scoping. We, the residents, firmly oppose the selection of the Shoreline site, or any other residential area, as a viable alternative for a jail. We are in agreement with The National Institute for Corrections, The City of Seattle, The Shoreline School District and The City of Lake Forest Park that a locating a jail in a highly residential neighborhood is inappropriate use.

We request a two-week extension to the Draft EIS Scoping Comment deadline. Many of our neighbors have not been informed of the possibility of a jail at the Shoreline site due to: 1) public meetings being held during the holiday season and during snow days, 2) language barriers of nearby residents, 3) the Land Use signage on the Shoreline site has been down for approximately two weeks, and 4) failure to notify, in writing, residents within 500 feet of the Shoreline site (see Shoreline Municipal Code, SMC 20.30.180)

“20.30.180 Public notice of public hearing.

Notice of the time and place of an open record hearing shall be made available to the public by the Department no less than 14 days prior to the hearing, through use of these methods:

Mail. Mailing to owners of real property located within 500 feet of the subject property;”

We believe these are sufficient grounds for a reasonable extension of the comment period.

Although many of the EIS topics have mitigations to solve issues with the properties sited for the jail, there are aspects of the Shoreline site which have *no* mitigations at all. We strongly suggest that the Shoreline site be removed from the list of possible jail sites immediately. It is not a reasonable alternative for the jail.

Sincerely



William R. Dickerson  
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Lake Forest Park, WA 98155  
206-985-0831



Eva S. Blum  
3017 NE 201<sup>st</sup> PL  
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