

To The Burien Planning Commission
To The Burien City Council
From-Chestine Edgar
Re-SMP-Errors in the 4 Technical Documents/Appendices-Errors in the Comprehensive
Plan, Conflict with the Zoning Ordinance
March 13, 2010

I have presented to you on the errors in the four technical documents that make up the baseline for the Shoreline Master Plan (SMP). I have requested on a number of occasions that these documents be corrected and reworked so that the Burien SMP can reflect the Best Available Science or at least current, accurate science about Lake Burien. As of this writing date, this still has not been done. Each time I review the City Planning Department matrix about my SMP concerns, I barely can figure out which comments were mine, whether the Planning Commission is going to even be allowed to consider them, and if they are going to be considered or how the wording will be corrected.

Below is another example of inconsistencies between: the SMP technical documents and the Comprehensive Plan, and between the Comprehensive Plan and parts of itself-policies and map. These need correction.

The Shoreline Inventory and the **Shoreline Analysis and Characterization** documents correctly identify Lake Burien as a Low Density Residential Zone/Area which are based on pages 2-8, 2-9, 2-10 of the Comprehensive Plan. The **Cumulative Impacts Analysis** identifies Lake Burien as a Moderate Density Residential Zone based on the map shown in the Comprehensive Plan. *However, the Comprehensive Plan appears to be in conflict with itself.* The Comprehensive Plan Policies, starting on page 2-1, state that Lake Burien can have development at the Low Density Residential level. The map contained in the Plan implies that development can occur at the level of Moderate Density. Moderate Density development is incorrect for Lake Burien because it is a sensitive/critical area. The map needs to be corrected now for Lake Burien and at a later time the issue of lot size and zoning code for Lake Burien needs to be revisited by the Planning Commission.

However, the **Cumulative Impact Analysis** needs to show that Lake Burien is Low Density Residential Area and a Class 2 Wetland in the body of the document. In some way Grette/ Reid Middleton needs to attempt to do an analysis of how the lot size for Moderate Density Residential zoning development area will affect an area that is really a Low Density Residential zoning area. The impact is significant to a critical area like Lake Burien which is both a wetland and aquifer recharge area. Please remember, that I presented both the Planning Commission and The City Council with tables about lot size and allowable impervious surface permitted under city codes. Those tables numerically represent what could be the future potential impact on Lake Burien by allowing moderate density development on what is now a very, low density, critical area. It is a significant environmental impact and will cause net loss to Lake Burien. The SMP is supposed keep that from happening.

CFT: 03/22/10

Additionally, the error in the wetland classification for Lake Burien needs to be addressed by Grette/Reid Middleton. They need to make a recommendation for a different buffer than currently appears in the flawed analysis in the Cumulative Impacts Analysis.

Until the sections on Lake Burien are corrected in all four of the Technical Documents and the analysis on Lake Burien is redone, nothing regarding Lake Burien in the SMP should be considered to be valid or applicable.

P.S. It is important to note that the Zoning Ordinance is also in conflict with the policies of the Comprehensive Plan. The Zoning Ordinance allows Moderate Density Residential development (due to lot size) on Low Density Residential critical area lands.