

BURIEN 2044

Final EIS



Burien

October 2024 DRAFT



October 18, 2024

Subject: Final Environmental Impact Statement, Burien 2044 Comprehensive Plan Update

Dear Reader:

The City of Burien is conducting a periodic update of its Comprehensive Plan addressing a new 20-year growth target for housing and jobs, a new future land use map and zoning districts, and updated goals and policies that fulfill Burien's vision and requirements in the Growth Management Act, Countywide Planning Policies, and VISION 2050. The proposal also includes adoption of the new Transportation Master Plan and Capital Facilities Plan. Consistency amendments to the Urban Center Plan are proposed. The Ambaum Boulevard Park Plan evaluated in an EIS in 2023 is being incorporated as a subarea plan into the Comprehensive Plan.

The Burien 2044 Comprehensive Plan Update proposes increasing middle housing in low density areas, amending multifamily and mixed-use areas along existing and future transit routes and nodes, and implementing the Urban Center Plan with new zoning regulations. New policies are proposed to undo racially disparate impacts of prior plans and zoning and reduce housing displacement pressures and exclusion. Also, housing targets for all incomes and for emergency housing would be integrated into the land use and housing elements.

The City is considering designating a planned action for the Urban Center consistent with RCW RCW 43.21C.440. A planned action for the Ambaum Boulevard Park Community Plan areas is also proposed based on the associated 2023 EIS.

The alternatives under review in the Final Environmental Impact Statement (Final EIS) include:

- **Alternative 1: No Action**—Continues the current Comprehensive Plan and zoning regulations.
- **Alternative 2: Neighborhood Centers** — Updates the Comprehensive Plan and zoning code to meet new state and regional requirements, and adds greater housing variety, affordability, and capacity including low density, moderate density, and high density housing and mixed use areas. The future land use pattern would focus mixed uses and multifamily in neighborhood centers with primary nodes in Downtown and along transit corridors including Ambaum Boulevard, First Avenue South, and Boulevard Park.
- **Alternative 3: Greater Downtown** — Updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien's new vision for 2044. Alternative 3 Greater Downtown would also increase housing variety, affordability, and capacity including low density, moderate density, and high density housing and mixed use areas. The land use pattern would emphasize investment in the Urban Center and along First Avenue South with potential for high rise buildings. The Northeast Redevelopment Area would be expanded westward for mixed use and northwards with light industrial job opportunities.

- **Preferred Alternative** – The Preferred Alternative blends features of Alternatives 2 and 3. It reflects a Greater Downtown in the Urban Center and along First Avenue, as well as offering mixed-use and multifamily opportunities in corridors and nodes in Ambaum and Boulevard Park as well as other locations. The plan shifted some density from the Ambaum corridor to First Avenue and other locations. It allows for middle housing (townhouses, multiplexes, accessory dwelling units, etc.) in Residential Low areas. It expands Industrial uses like Alternative 3 and other employment opportunities particularly in commercial and mixed-use areas similar to the City's Economic Development Action Plan. It slightly reduces the Urban Center on the north while adding mixed uses to reflect the Creative District adopted by Burien. It also adjusts the mix of multifamily and mixed uses in Sunnydale.

The Final EIS compares and contrasts the alternatives for a range of topics including: natural environment (earth, water resources, plants and animals), air quality, land use patterns, plans & policies, socioeconomics, noise, transportation, public services (police, fire/emergency services, parks, schools), stormwater, water & sewer.

The Final EIS responds to comments on the Draft EIS during a 60-day comment period from January 10 to March 11, 2024. It also shares the Preferred Alternative developed by the Planning Commission.

The key issues facing decision makers include:

- Creation of a growth concept carried forward in plans and regulations that meets the vision and values of Burien and meets state and regional requirements including allocated targets and policies.
- Identification of the infrastructure that improves mobility and resilience, and improve natural drainage with green infrastructure, and add parks and recreation.
- Approval of development regulations that implement the Comprehensive Plan goals and land use plan, resulting in housing for all needs and incomes.
- Approval of Urban Center zoning and a Planned Action Ordinance or Infill Exemption to help incentivize growth while mitigating impacts in the Urban Center.

Please contact Chaney Skadsen, Senior Planner, 206-439-3152, for questions. Thank you for your interest in the Burien 2044 Comprehensive Plan Update.

Sincerely,



Liz Stead
Burien Community Development Director
SEPA Responsible Official

Fact Sheet

Project Title

Burien 2044 Comprehensive Plan Update

Proposed Action & Alternatives

The City of Burien is conducting a periodic update of its Comprehensive Plan addressing a new 20-year growth target for housing and jobs, a new future land use map and zoning districts, and updated goals and policies that fulfill Burien's vision and requirements in the Growth Management Act, Countywide Planning Policies, and VISION 2050. The proposal also includes adoption of the new Transportation Master Plan. Other related initiatives to be addressed include the Parks, Recreation, and Open Space Plan Update and its integration into the Capital Facilities Plan. Consistency amendments to the Urban Center Plan are proposed. The Ambaum Boulevard Park Plan evaluated in an EIS in 2023 is being incorporated as a subarea plan into the Comprehensive Plan.

The Burien 2044 Comprehensive Plan Update proposes increasing middle housing in low density areas, amending multifamily and mixed-use areas along existing and future transit routes and nodes, and implementing the Urban Center Plan with new zoning regulations. New policies are proposed to undo racially disparate impacts of prior plans and zoning and reduce housing displacement pressures and exclusion. Also, housing targets for all incomes and for emergency housing would be integrated into the land use and housing elements. As an incentive to develop housing consistent with the City's Comprehensive Plan and zoning code, the City's multifamily tax exemption code would be updated to meet recent state law amendments and to extend the incentive beyond the Urban Center to all mixed use and multifamily zones.

The City is proposing to designate a planned action for the Urban Center consistent with RCW 43.21C.440.

The alternatives under review in the Final Environmental Impact Statement (Final EIS) include:

- **Alternative 1: No Action**—Continues the current Comprehensive Plan and zoning regulations. The current plan provides capacity for about 6,500 new housing units and about 1,760 new

jobs, less than the Countywide Planning Policy growth targets of 7,500 housing units and 4,770 jobs.

- ▶ **Alternative 2: Neighborhood Centers** — Updates the Comprehensive Plan and zoning code to meet new state and regional requirements, and adds greater housing variety, affordability, and capacity including low density, moderate density, and high-density housing and mixed-use areas. The future land use pattern would focus mixed uses and multifamily in neighborhood centers with primary nodes in Downtown and along transit corridors including Ambaum Boulevard, First Avenue South, and Boulevard Park. Middle housing would be addressed in Residential Low with the widest range of middle housing in proximity to Neighborhood Centers or corridors, and a moderate range of middle housing the balance of single-family residential areas. Jobs would continue to be focused in the Urban Center and in Industrial Areas with a mixed-use expansion west of the Northeast Redevelopment Area. The Alternative would provide capacity for 11,870 new housing units and 2,960 new jobs. The alternative can meet housing growth targets for 2044 but is less than the target for jobs.
- ▶ **Alternative 3: Greater Downtown** — Updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien's new vision for 2044. Alternative 3 Greater Downtown would also increase housing variety, affordability, and capacity including low density, moderate density, and high-density housing and mixed-use areas. The land use pattern would emphasize investment in the Urban Center and along First Avenue South with potential for high rise buildings. The Northeast Redevelopment Area would be expanded westward for mixed use and northwards with light industrial job opportunities. Based on the greater potential building heights, the alternative provides housing capacity range of 11,674 to 14,107 new housing units more than the 2044 target. The alternative provides capacity for 4,770 to 5,115 new jobs and meets 2044 job targets, the only one evaluated in the Draft EIS to do so.
- ▶ **Preferred Alternative** – The Preferred Alternative blends features of Alternatives 2 and 3. It reflects a Greater Downtown in the Urban Center and along First Avenue, as well as offering mixed-use and multifamily opportunities in corridors and nodes in Ambaum and Boulevard Park as well as other locations. The plan shifted some density from the Ambaum corridor to First Avenue and other locations. It allows for middle housing (townhouses, multiplexes, accessory dwelling units, etc.) in Residential Low areas. It expands Industrial uses like Alternative 3 and other employment opportunities particularly in commercial and mixed-use areas similar to the City's Economic Development Action Plan. It slightly reduces the Urban Center on the north while adding mixed uses to reflect the Creative District adopted by Burien. It also adjusts the mix of multifamily and mixed uses in Sunnydale. Based on the greater potential building heights like Alternative 3, the Preferred Alternative provides housing capacity in the range of 11,402 - 14,274 new housing units, more than the 2044 target. The Preferred Alternative also provides capacity for 4,677 - 5,162 new jobs and meets 2044 job targets like Alternative 3.

Proponent & Lead Agency

City of Burien Community Development Department

Location

Burien city limits

Tentative Date of Implementation

December 2024

Responsible SEPA Official

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Required Approvals

The following City of Burien actions would be required to implement the Proposal:

- ▶ Adoption of Comprehensive Plan periodic update with updated and new elements.
- ▶ Adoption of subarea plans for Ambaum Boulevard Park based on a multiyear engagement effort and 2023 EIS
- ▶ Adoption of consistency amendments to the Urban Center Plan
- ▶ Approval of an updated Transportation Master Plan
- ▶ Adoption of Zoning and Development Regulation Amendments.
- ▶ Adoption of a Planned Action ordinance.

- Update and extension of the City's multifamily tax exemption code beyond the Urban Center to all mixed use and multifamily zones.

Prior to City action, the State of Washington Department of Commerce will coordinate state agency review of the legislative proposal. Regional certification of the Comprehensive Plan is required by the Puget Sound Regional Council (PSRC). King County will review the Housing Element with regard to the Countywide Planning Policies consistency.

After City action, the likely permits to be acquired by individual development proposals include but are not limited to land use permits, construction permits, building permits, and right-of-way use permits.

Principal EIS Authors & Contributors

Under the direction of the City of Burien, the consultant team prepared the EIS as follows:

- [BERK Consulting](#) (prime consultant): SEPA documentation; Land Use Patterns; Plans & Policies; Socioeconomics; Public Services
- [MAKERS](#): Aesthetics
- [Kimley Horn](#) Kimley-Horn and Associates, Inc.: Air Quality; Noise.
- [Perteet](#): Natural Environment; Stormwater; Water & Sewer
- [Fehr & Peers](#): Transportation.

Draft EIS Date of Issuance and Comment Period

Issued: January 10, 2024

Comment Period: January 10, 2024 to March 11, 2024

Final EIS Date of Issuance

October 18, 2024

Date of Final Action

Fall 2024

Prior Environmental Review

The City of Burien developed an EIS in association with its Comprehensive Plan in 1997 and addended it through 2003. See the [Comprehensive Plan Appendix 4.5](#).

The City issued the Final EIS for the Ambaum Corridor and Boulevard Park Planned Action in April 2023. See [Draft EIS](#) and [Final EIS](#).

Location of Background Data

You may review the City of Burien website for more information at:

<https://connect.burienwa.gov/projects/comprehensive-plan-update/>. Please see the contact person above if you desire clarification or have questions.

Purchase/Availability of Final EIS

The Final EIS can be downloaded from the City of Burien's website at

<https://connect.burienwa.gov/projects/comprehensive-plan-update/>. A hard copy, compact disk, or thumb drive are available for purchase at cost (see the contact person above to arrange).

Distribution List

Tribes & Federal Agencies

Duwamish Tribe
Muckleshoot Tribe
National Oceanic and Atmospheric
Administration Fisheries, National Marine
Fisheries Service
U.S. Army Corps of Engineers
U.S. Department of Fish & Wildlife Services
U.S. Department of Housing & Urban
Development
U.S. Environmental Protection Agency

State Agencies

Puget Sound Partnership
Washington Department of Corrections
Washington Department of Fish and Wildlife
Washington State Department of Commerce
Washington State Department of Ecology
Washington State Department of Health
Washington State Department of Social and
Health Services
Washington State Department of
Transportation

Service Providers

Burien Police Services
City of Des Moines
City of Normandy Park
City of SeaTac
City of Tukwila
Highline Public Schools
Highline Water District
King County Fire District 2
King County Water District 20
King County Water District 49
Midway Sewer District
North Highline Fire District
Puget Sound Energy
Seattle Department of Construction and
Inspections
Seattle Public Utilities
Southwest Suburban Sewer District
Valley View Sewer District

Cities & Counties

City of Normandy Park
City of SeaTac
City of Seattle
City of Tukwila
King County Department of Natural
Resources
King County Department of Environmental
Services
King County Department of Public Health
King County Metro Transit
Port of Seattle
Puget Sound Clean Air Agency
Puget Sound Regional Council
Sound Transit

Community Organizations & Individuals

Burien Shape Your City Contact List
B-Town Blog
Seattle Times
Seahurst Community Club
Shorewood Community Club
Parsons, Randall and Carol
Spani, Marco
Commenters per Chapter 3 and Appendix E
of this Final EIS (Commenters on Draft EIS,
Planning Commission hearing, and City
Council review and hearing process)

Contents

1	Summary	1-1
1.1	Proposal and Alternatives	1-1
1.2	Study Area	1-3
1.3	SEPA Process	1-4
1.4	Objectives & Alternatives	1-6
1.5	Major Issues to Be Resolved	1-26
1.6	Summary of Impacts & Mitigation Measures	1-27
1.7	Equity & Climate Resiliency	1-65
2	Preferred Alternative Focused Evaluation	2-1
2.1	Natural Environment	2-1
2.2	Plans and Policies	2-6
2.3	Transportation	2-13
2.4	Water and Sewer	2-18
3	Draft EIS Comment Period: Comments and Responses	3-1
4	Clarifications and Corrections	4-1
4.1	Summary	4-1
4.2	Proposal & Alternatives	4-1
4.3	Environment, Impacts, & Mitigation Measures	4-1
5	Acronyms & References	5-1
5.1	Acronyms	5-1
5.2	References	5-4

6 Appendices

6-1

-
- A Preferred Future Land Use and Zoning Maps October 2024
 - B 60-day Comment Period: Marked Comment Letters
 - C Land Capacity Evaluation
 - D Draft Planned Action Ordinances
 - E Comments After DEIS Comment Period

Exhibits

Exhibit 1.2-1. Comprehensive Plan Study Area – City Limits	1-4
Exhibit 1.3-1. EIS Process	1-5
Exhibit 1.3-2. Plan Engagement Process	1-6
Exhibit 1.4-1. Consolidated No Action Comprehensive Plan Map	1-8
Exhibit 1.4-2. Burien Zoning Map	1-9
Exhibit 1.4-3. Alternative 1 Growth Capacity	1-10
Exhibit 1.4-4. Downtown Urban Center Capacity and Assumptions – Alternative 1	1-10
Exhibit 1.4-5. Alternatives 2 and 3 Future Land Use Description	1-10
Exhibit 1.4-6. Alternative 2 Neighborhood Centers – Acres by Designation	1-11
Exhibit 1.4-7. Alternative 2 Neighborhood Centers	1-12
Exhibit 1.4-8. Alternative 2 Growth Capacity	1-12
Exhibit 1.4-9. Downtown Urban Center Capacity and Assumptions – Alternative 2	1-13
Exhibit 1.4-10. Alternative 3 Greater Downtown	1-14
Exhibit 1.4-11. Alternative 3 Greater Downtown Acres	1-15
Exhibit 1.4-12. Alternative 3 Growth Capacity	1-15
Exhibit 1.4-13. Downtown Urban Center	1-16
Exhibit 1.4-14. Downtown Urban Center Capacity and Assumptions – Alternative 3	1-17
Exhibit 1.4-15. Preferred Alternative – Future Land Use Plan	1-18
Exhibit 1.4-16. Preferred Alternative Acres	1-18
Exhibit 1.4-17. Preferred Alternative Growth Capacity	1-19
Exhibit 1.4-18. Preferred Alternative – Proposed Zoning Fall 2024	1-20
Exhibit 1.4-19. Zoning Abbreviations and Definitions: Preferred Alternative (September 2024)*	1-20
Exhibit 1.4-20. Proposed Urban Center Boundaries and relationship to Creative District	1-22
Exhibit 1.4-21. Urban Center Proposed Amended Concept Plan	1-23
Exhibit 1.4-22. Downtown Urban Center Capacity and Assumptions – Alternative 3	1-24

Exhibit 1.4-23. Summary of Alternatives	1-26
Exhibit 1.6-1. Transportation Exhaust Criteria Pollutant Emissions (tons/year)	1-35
Exhibit 1.6-2. GHG Emissions (MTCO ₂ e) compared to existing per capita rate of 3.21	1-36
Exhibit 1.6-3. Targets and Capacity by Alternatives	1-42
Exhibit 1.6-4. Multifamily Units that Could Redevelop (1978 or Older)	1-42
Exhibit 1.6-5. Commercial, Industrial, and Service Spaces on Redevelopable Sites	1-43
Exhibit 1.6-6. Growth Targets	1-43
Exhibit 1.6-7. Affordable Housing Mix and Target Achievement – Chart by Alternative	1-44
Exhibit 1.6-8. Maximum Permissible Noise Level	1-47
Exhibit 1.6-9. Vehicle Miles Travelled by Alternative – Potential for Stormwater Pollutant Loading	1-58
Exhibit 1.6-10. Vacant Land (Acres) and Intensity of Land Use by Alternative	1-59
Exhibit 1.6-11. Redevelopable Land (Acres) and Intensity of Land Use by Alternative	1-59
Exhibit 1.7-1. Summary of Equity & Climate Resiliency Considerations	1-66
Exhibit 2.1-1. Burien Critical Areas	2-2
Exhibit 2.1-2. Shoreline Designations	2-4
Exhibit 2.2-1. GMA Goal Evaluation Matrix	2-7
Exhibit 2.2-2. VISION 2050 Policy Summary evaluation	2-10
Exhibit 2.2-3. Countywide Planning Policy Evaluation Matrix	2-11
Exhibit 2.2-4. Burien Existing Vision Statement	2-12
Exhibit 2.4-1. Growth Comparison by Alternative	2-19
Exhibit 2.4-1. Agencies	3-1
Exhibit 2.4-2. Interest Groups	3-2
Exhibit 2.4-3. Resident Comments, Multiple Areas and Topics	3-3
Exhibit 2.4-4. Residents 132nd Street	3-4
Exhibit 5.2-1. Comments Received after 60-Day Draft EIS Comment Period	6-6

1 Summary

This Chapter 1 Summary describes the Burien 2044 Comprehensive Plan Update land use and growth Alternatives and the environmental evaluation of them. More detailed information on Alternatives is found in Chapter 2 and the full environmental evaluation in Chapter 3.

1.1 Proposal and Alternatives

The City of Burien is conducting a periodic update of its Comprehensive Plan addressing a new 20-year growth target for housing and jobs, a new future land use map and zoning districts, and updated goals and policies that fulfill Burien’s vision and requirements in the Growth Management Act, Countywide Planning Policies, and VISION 2050. The proposal also includes adoption of the new Transportation Master Plan. Other related initiatives to be addressed include the Parks, Recreation, and Open Space Plan Update and its integration into the Capital Facilities Plan.

The Burien 2044 Comprehensive Plan Update proposes increasing middle housing in low density areas, amending multifamily and mixed-use areas along existing and future transit routes and nodes, and implementing the Urban Center Plan with new zoning regulations. New policies are proposed to undo racially disparate impacts of prior plans and zoning and reduce housing displacement pressures and exclusion. Also, housing targets for all incomes and for emergency housing would be integrated into the land use and housing elements.

The City is considering designating an infill exemption or a planned action for the Urban Center consistent with ~~RCW 43.21C.229~~ or RCW 43.21C.440.

~~Three~~ The alternatives under review in the ~~Draft-Final~~ Environmental Impact Statement (~~Draft-Final~~ EIS) include:

- ▶ **Alternative 1: No Action** — Continues the current Comprehensive Plan and zoning regulations. The current plan provides capacity for about 6,500 new housing units and about 1,760 new jobs, less than the Countywide Planning Policy growth targets of 7,500 housing units and 4,770 jobs.
- ▶ **Alternative 2: Neighborhood Centers** — Updates the Comprehensive Plan and zoning code to meet new state and regional requirements, and adds greater housing variety, affordability, and

capacity including low density, moderate density, and high density housing and mixed use areas. The future land use pattern would focus mixed uses and multifamily in neighborhood centers with primary nodes in Downtown and along transit corridors including Ambaum Boulevard, First Avenue South, and Boulevard Park. Middle housing would be addressed in Residential Low with the widest range of middle housing in proximity to Neighborhood Centers or corridors, and a moderate range of middle housing the balance of single-family residential areas. Jobs would continue to be focused in the Urban Center and in Industrial Areas with a mixed use expansion west of the Northeast Redevelopment Area. The Alternative would provide capacity for 11,870 new housing units and 2,960 new jobs. The alternative can meet housing growth targets for 2044 but is less than the target for jobs.

- **Alternative 3: Greater Downtown** — Updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien’s new vision for 2044. Alternative 3 Greater Downtown would also increase housing variety, affordability, and capacity including low density, moderate density, and high density housing and mixed use areas. The land use pattern would emphasize investment in the Urban Center and along First Avenue South with potential for high rise buildings. The Northeast Redevelopment Area would be expanded westward for mixed use and northwards with light industrial job opportunities. Based on the greater potential building heights, the alternative provides housing capacity range of 11,674 to 14,107 new housing units more than the 2044 target. The alternative provides capacity for 4,770 to 5,115 new jobs and meets 2044 job targets, the only one evaluated in the Draft EIS to do so.

Following the Draft EIS the City developed a Preferred Alternative considering comments and the results of the environmental evaluation and blending features of the other alternatives. It is evaluated in this Final EIS.

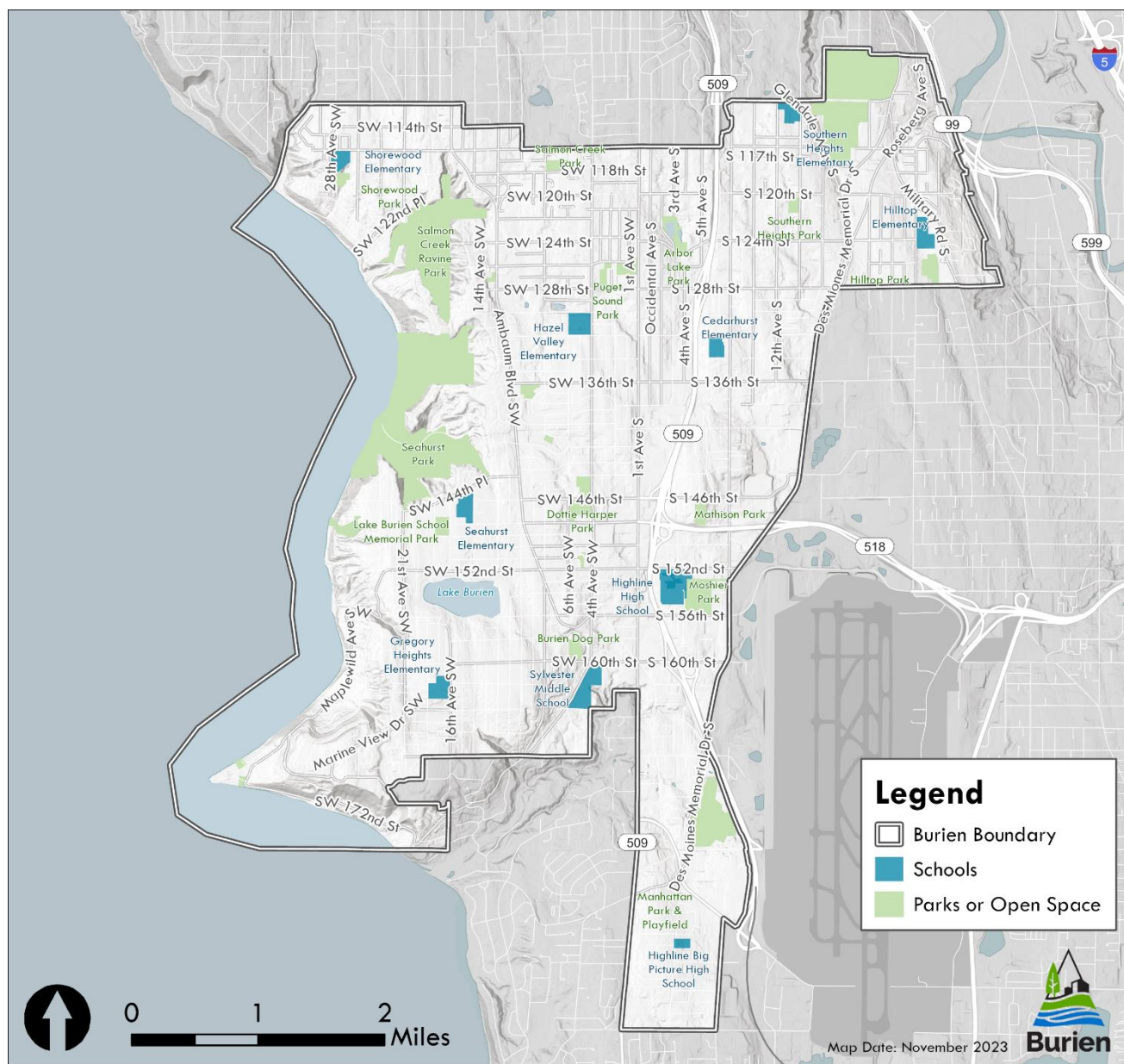
- **Preferred Alternative** – The Preferred Alternative blends features of Alternative 2 and 3. It reflects a Greater Downtown in the Urban Center and along First Avenue, as well as offering mixed use and multifamily opportunities in corridors and nodes in Ambaum and Boulevard Park as well as other locations. The plan shifted some density from the Ambaum corridor to First Avenue and other locations. It allows for middle housing (townhouses, multiplexes, accessory dwelling units, etc.) in Residential Low areas. It expands Industrial uses like Alternative 3 and other employment opportunities particularly in commercial and mixed use areas similar to the City’s Economic Development Action Plan. It slightly reduces the Urban Center on the north while adding mixed uses to reflect the Creative District adopted by Burien. It also adjusts the mix of multifamily and mixed uses in Sunnysdale. Based on the greater potential building heights like Alternative 3, the Preferred Alternative provides housing capacity range of 11,402 - 14,274 new housing units more than the 2044 target. The alternative provides capacity for 4,677 - 5,162 new jobs and meets 2044 job targets like Alternative 3.

1.2 Study Area

The City of Burien is 10.04 square miles in area and located in southwest King County, south of Seattle and White Center. Its western border is the Puget Sound, and its eastern border includes SR 99/Tukwila International Boulevard, and Des Moines Memorial Drive S. The study area for the Comprehensive Plan and EIS consists of the city limits. See [Exhibit 1.2-1](#).

Additional study areas in the city include the Urban Center, Ambaum Corridor and Boulevard Park subareas. See Chapter 2 for additional maps and information.

Exhibit 1.2-1. Comprehensive Plan Study Area – City Limits



Source: City of Burien, King County, BERK 2023.

1.3 SEPA Process

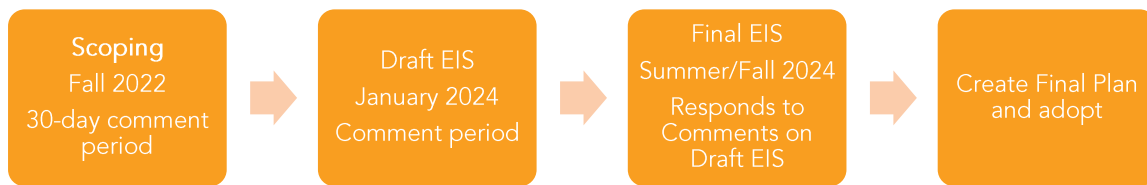
1.3.1 Environmental Review Process

Under the State Environmental Policy Act (SEPA), governments conduct environmental review of actions that could affect the environment. For actions that have the potential for significant impacts,

preparation of an Environmental Impact Statement (EIS) is required. An EIS is a useful tool that provides detailed information to the public, agencies, Native nations, and City decision-makers about the environmental effects of a plan or project before a decision is made.

The EIS process involves the following steps: (1) scoping the contents of the EIS with agencies, Native nations, and the public; (2) preparing a draft EIS with a comment period; (3) responding to comments and developing a preferred alternative in a final EIS; and (4) developing legislation. See [Exhibit 1.3-1](#).

Exhibit 1.3-1. EIS Process



Source: BERK, 2023.

Scoping the EIS occurred in 2022 during the visioning process. The EIS is evaluating the land use alternatives across a range of natural and built environment topics including:

- ▶ Natural Environment – earth, water resources, plants and animals
- ▶ Air Quality
- ▶ Land Use Patterns
- ▶ Plans & Policies
- ▶ Socioeconomics
- ▶ Noise
- ▶ Aesthetics
- ▶ Transportation
- ▶ Public Services
- ▶ Stormwater
- ▶ Water & Sewer

The City ~~has~~ issued the Draft EIS in January 2024. A Final EIS ~~will be~~ issued in ~~late October~~ 2024 and ~~will include~~ responses to public comments received during the Draft EIS comment period. As part of the Final EIS a Preferred Alternative ~~would be~~ studied in the range of the Draft EIS Alternatives. It ~~can mix~~ or and ~~es~~ matches features studied with the Draft EIS Alternatives.

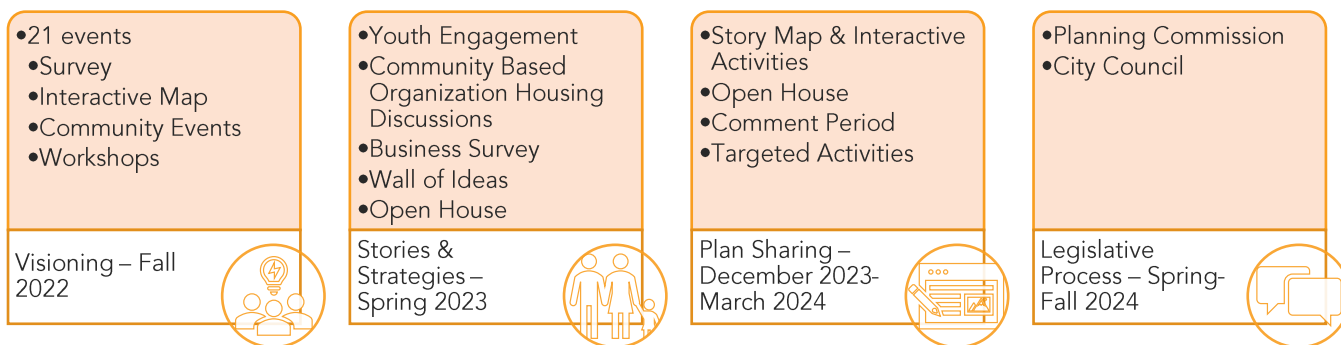
Following the EIS process, the City will consider adoption of the Comprehensive Plan.

1.3.2 Public Comment Opportunities

The City of Burien created a coordinated planning effort called Shape Your City – combining major updates to the Comprehensive Plan, a new Transportation Master Plan, and an update to the Parks, Recreation and Open Space Plan. In addition, Shape Your City coordinates related efforts like the Ambaum and Boulevard Park Community Plan and the Economic Development Action Plan.

There are four phases to the Shape Your City effort: 1) visioning, 2) stories and strategies, 3) plan sharing, and 4) legislative process. See [Exhibit 1.3-2](#). In fall 2022, the City held Visioning activities, and in spring 2023 they held Stories & Strategies events. ~~This~~ An open house, story map, and a Draft EIS is/were part of the Plan Sharing Phase. The legislative process has been ongoing Spring 2024 to Fall 2024. A summary of the engagement is available in Draft EIS Chapter 2 and in the Draft EIS Appendices.

Exhibit 1.3-2. Plan Engagement Process



1.4 Objectives & Alternatives

1.4.1 Objectives

The State Environmental Policy Act (SEPA) requires a statement of proposal objectives and the purpose and need to which the proposal is responding. Alternatives are different means of achieving objectives.

For the purposes of this EIS, the primary objective is to meet the City’s Burien 2044 Vision Statement and the Burien 2044 Values.

Burien 2044 Vision: Burien aims to be a prosperous, equitable, sustainable, resilient, innovative, and safe community where people of diverse backgrounds lead fulfilling lives with friends and family, business and work opportunities, and rich cultural and recreational activities with programs for and by our youth, elders, and all ages. As the city grows, quality of life improves for current and future residents.

The Burien 2044 Comprehensive Plan Update also includes values. Values are core principles or beliefs. They are cross-cutting statements that support multiple elements of the Comprehensive Plan. The Values also serve as SEPA objectives. The Values are listed below and fully shared in Chapter 2.

Values guiding the plan include:

- ▶ Equitable
- ▶ Prosperous
- ▶ Fiscally Responsible
- ▶ Environmentally Sustainable
- ▶ Resilient
- ▶ Safe
- ▶ Innovative

Other process objectives that apply to the studied alternatives include:

- ▶ Comply with Comprehensive Plan periodic review requirements to meet state laws including recent changes to the GMA and to align with the regional growth strategy in the Puget Sound Regional Council (PSRC) VISION 2050.
- ▶ Demonstrate housing and job capacity to accommodate growth targets through 2044 consistent with Countywide Planning Policies.
- ▶ Update and simplify future land use map categories and zoning districts and reflect any new designations such as within urban centers.
- ▶ Reflect the vision in new policies and update policies that are inconsistent, outdated, duplicative, or unclear.
- ▶ Facilitate growth in centers such as through permit streamlining through SEPA planned actions or infill exemptions.

1.4.2 Alternative 1: No Action

Citywide

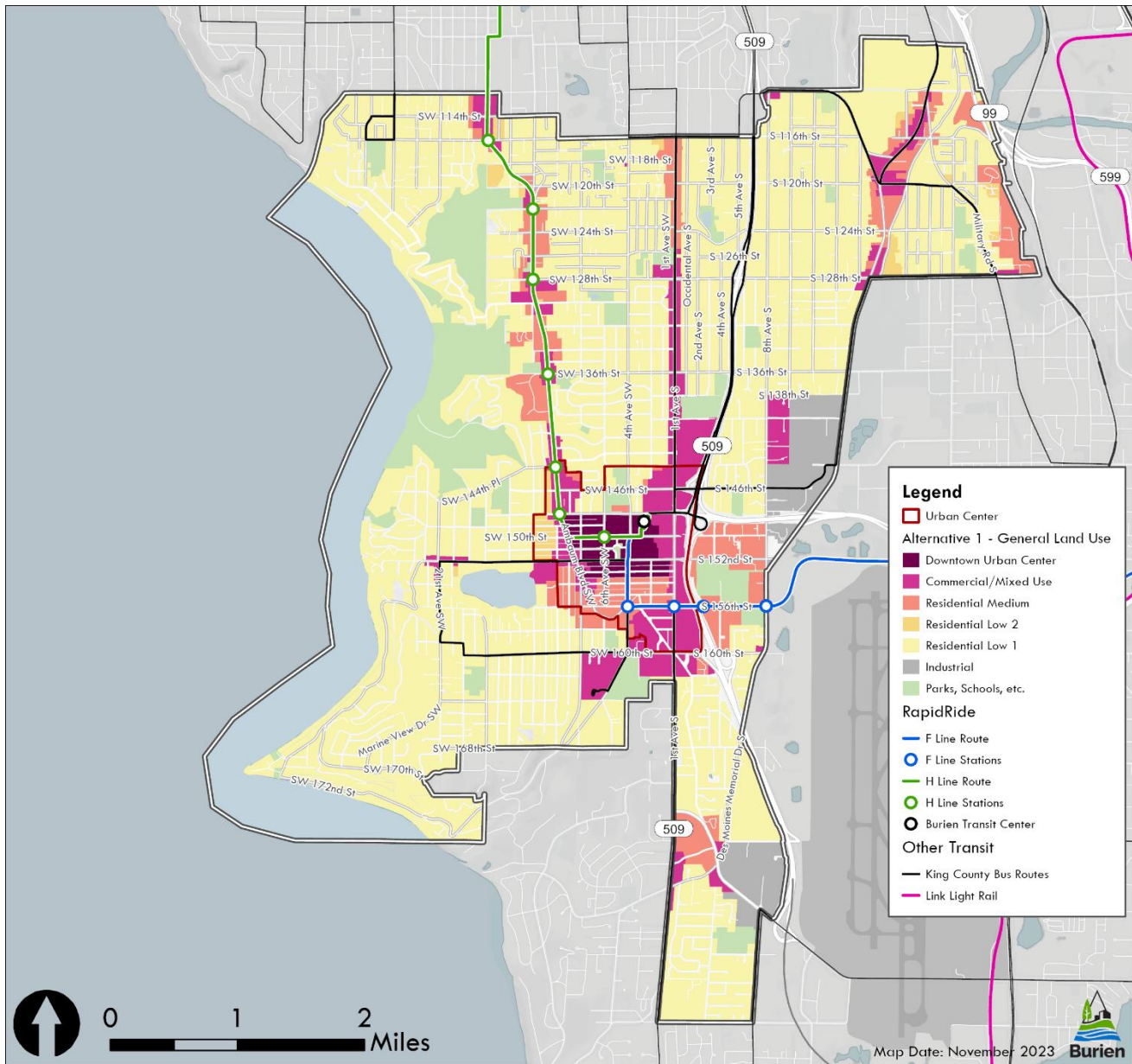
Burien's current Land Use Element promotes developing a sustainable community by:

- ▶ maintaining and enhancing the viability of our neighborhoods, including existing and new housing stock;
- ▶ enhancing the downtown area, including reusing existing structures, facilities, and infrastructure and modifying them according to our current needs and technology;
- ▶ balancing community needs for capital facilities and services with the ability to finance them; and

- locating pedestrian-oriented residential densities and services within proximity to transit services.

The Land Use Element includes a Comprehensive Plan Map and illustrates the planned intensities and major nodes including Downtown, Ambaum Boulevard, First Avenue South, Des Moines Memorial Drive, and the Northeast Redevelopment Area (industrial). To compare to action alternatives, a summary of the categories is shown in [Exhibit 1.4-1](#). More detailed maps are available in [Draft EIS Chapter 2](#).

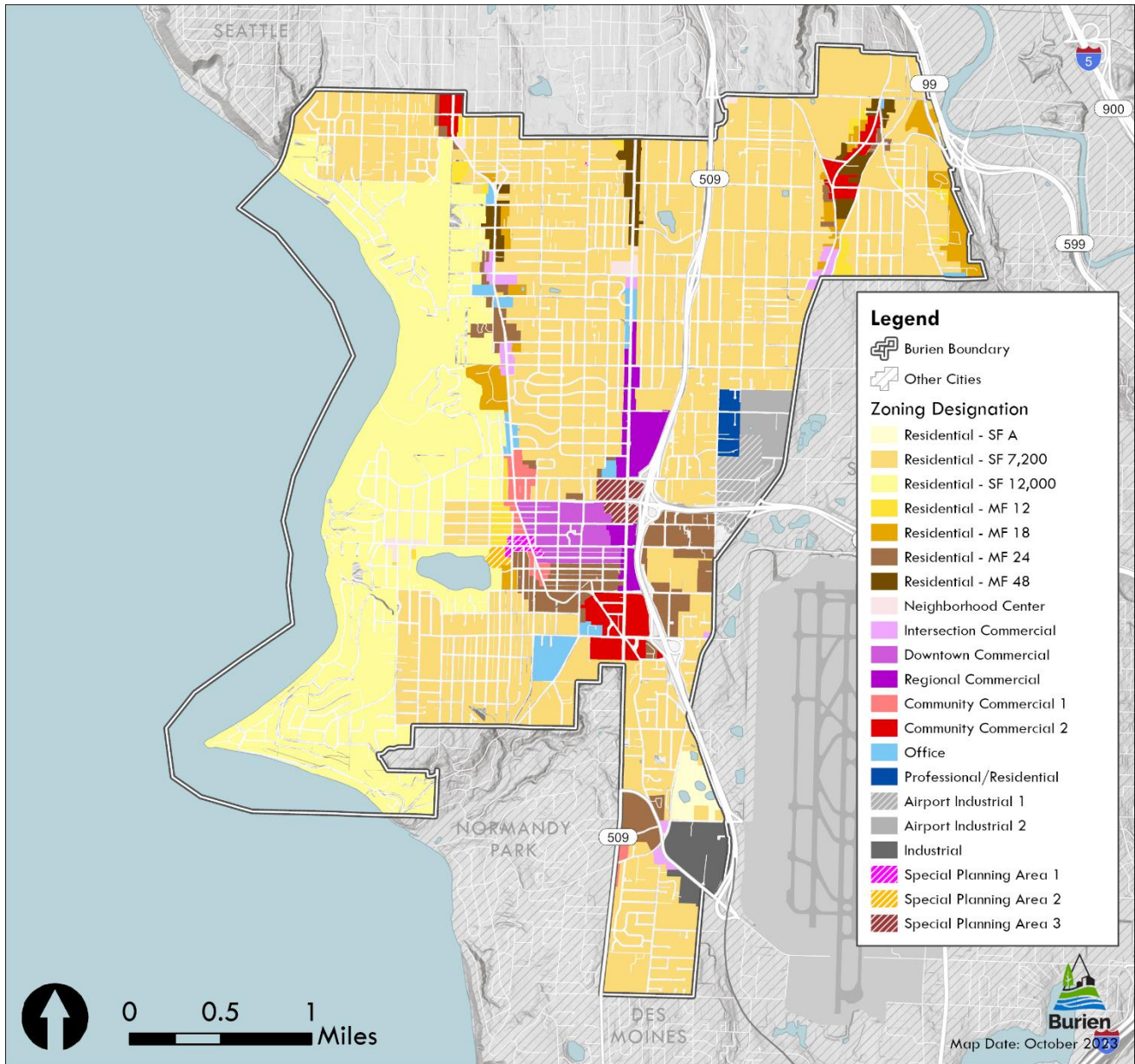
Exhibit 1.4-1. Consolidated No Action Comprehensive Plan Map



Source: BERK, 2023.

Burien implements the Comprehensive Plan with a Zoning Map, similar in its level of detail and number of districts that implement the plan. RS-7200 and RS-12000, single family districts, are the most prevalent. See [Exhibit 1.4-2](#).

Exhibit 1.4-2. Burien Zoning Map



Source: City of Burien, 2020.

Based on the zoning and vacant and redevelopable land, the capacity is about 90% of the housing target whether considering a 2019 parcel base or a 2023 parcel base. The job capacity is well below the target. See [Exhibit 1.4-3](#).

Exhibit 1.4-3. Alternative 1 Growth Capacity

	Target: 2019-2023	Urban Growth Capacity 2019	Capacity Reevaluation 2023/ Assumed for Study in EIS
Housing units	7,500	6,712*	6,499
Jobs	4,770	752	1,760

*Corrects results compared to the King County Urban Growth Capacity Report, 2021.

Source: King County, 2021; BERK 2023.

Subarea Plans

The Burien Urban Center Plan completed in 2019 is part of the Comprehensive Plan as a subarea plan. The Urban Center Plan has identified different character areas. The Urban Center subarea plans recommendations have not been fully implemented in zoning district boundaries or standards. Some of the height assumptions would differ from those adopted in the Comprehensive Plan and zoning. For additional information about the plan, please see Chapter 2.

Alternative 1 proposes the most growth centralized in the Downtown Urban Center of the studied alternatives. See [Exhibit 1.4-4](#).

Exhibit 1.4-4. Downtown Urban Center Capacity and Assumptions – Alternative 1

Residential Capacity	Share of Growth Target	Increase above Existing Dwellings	Employment Capacity	Share of Growth Target
3,232	43%	124%	521	11%

Source: King County, City of Burien, 2019; BERK 2023.

Under Alternative 1, the Ambaum Boulevard Park Community Plan would not be adopted as it has not been completed.

1.4.3 Action Alternatives

Action Alternatives 2 and 3 and the Preferred Alternative update the Future Land Use Map and implementing zoning. The designations are more simplified but similarly focus growth in the Downtown Urban Center and corridors with multifamily and mixed use categories. See [Exhibit 1.4-5](#).

Exhibit 1.4-5. Alternatives 2 and 3 Future Land Use Description

Name	Future Land Use Description
Downtown Urban Center	Burien's most intense mix of commercial and residential development with a focus on jobs, transit orientation, Burien's civic center, arts and culture, and entertainment. Buildings may be a mix of low, mid, and high rise development.
Commercial/Mixed Use	A mix of commercial, mixed-use, and residential buildings, ranging from single-story to midrise development that provides services, jobs, and housing to Burien's residents and are located near transit and/or amenities.

Name	Future Land Use Description
Residential Medium	Primarily multi-story residential buildings, including low-rise and midrise apartments/condominiums, townhouses, and other building types located near transit and/or amenities. Some buildings include small commercial ground floor uses.
Residential Low 2	Primarily moderate-scale middle housing types, including a mix of townhouses, multiplexes, courtyard apartments, and detached houses.
Residential Low 1	Primarily detached houses with some duplexes, cottage clusters, and other low-scale middle housing types.
Industrial	Primarily employment-oriented land uses like warehouses, workshops, manufacturing facilities, processing and distribution, business park and flex-tech, small office or flexible buildings, and auto sales.
Parks & schools	Parks, schools, community centers, trails, open spaces, and other public and quasi-public facilities and properties.

Source: Makers, 2023.

1.4.3.1 Alternative 2: Neighborhood Centers

Citywide

Alternative 2 updates the Comprehensive Plan and zoning code to meet new state and regional requirements and adds greater housing variety, affordability, and capacity including low density, moderate density, and high density housing and mixed use areas. The future land use pattern would focus mixed uses and multifamily in neighborhood centers with primary nodes in Downtown and along transit corridors including Ambaum Boulevard, First Avenue South, and Boulevard Park. Middle housing would be addressed in Residential Low with the widest range of middle housing in proximity to Neighborhood Centers or corridors, and a moderate range of middle housing the balance of single-family residential areas. Jobs would continue to be focused in the Urban Center and in Industrial Areas with a mixed use expansion west of the Northeast Redevelopment Area. See [Exhibit 1.4-7](#).

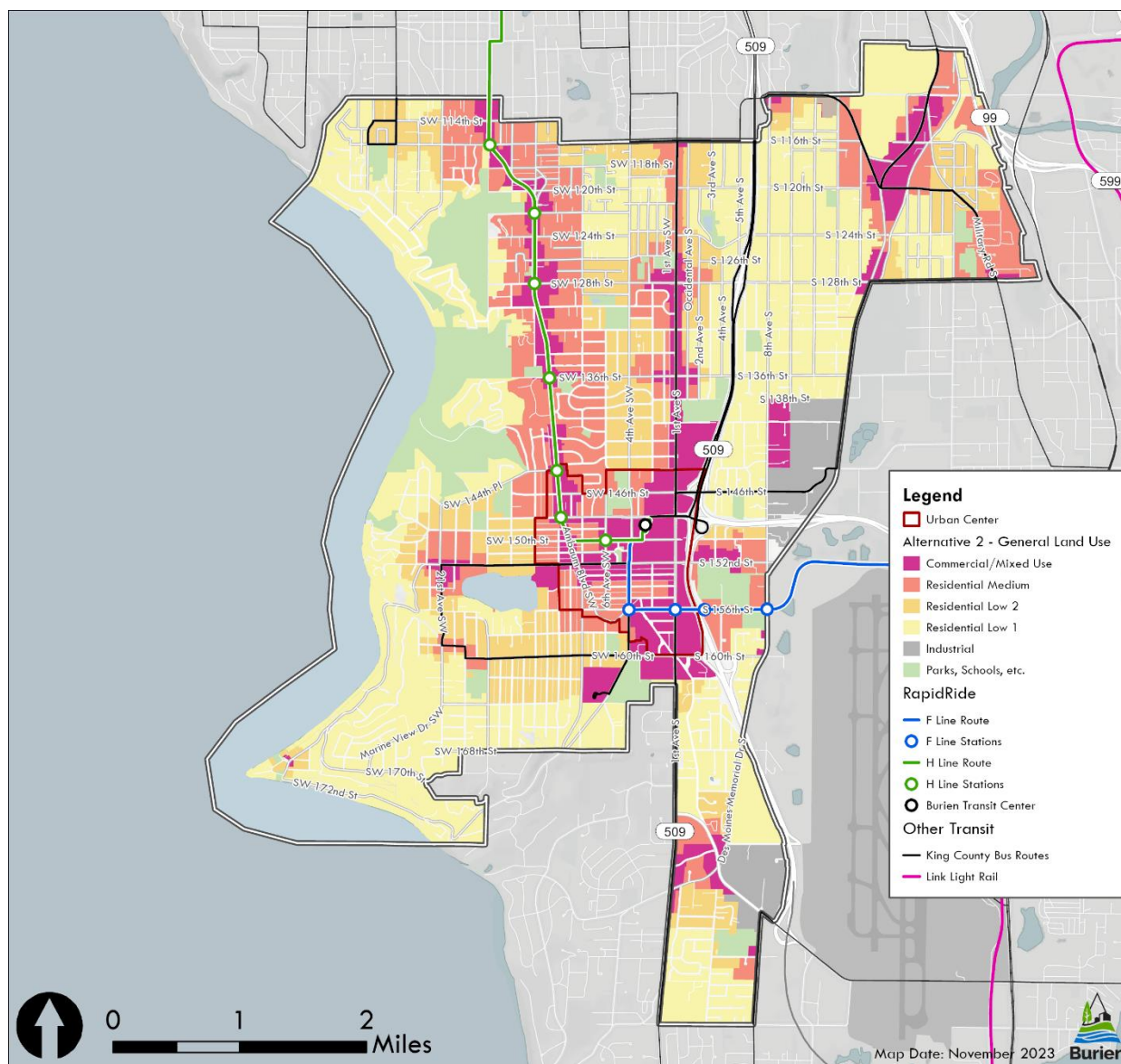
Most of the Alternative 2 Future Land Use Map designations land as Residential Low 1 or 2, which both address single family and attached middle housing types of different intensities. See [Exhibit 1.4-6](#).

Exhibit 1.4-6. Alternative 2 Neighborhood Centers – Acres by Designation

Designation	Acres
Commercial/Mixed Use	592
Industrial	191
Parks, Schools, etc.	531
Residential Low 1	2,222
Residential Low 2	720
Residential Medium	936
Grand Total	5,191

Source: Makers, BERK, 2023

Exhibit 1.4-7. Alternative 2 Neighborhood Centers



Source: Makers, BERK, 2023

With greater intensities in Residential Low areas as well as the center areas, growth capacity is greater. See [Exhibit 1.4-8](#). Alternative 2 has the capability to meet housing growth targets including by income band as further described in Chapter 3. Jobs are greater than Alternative 1 but still below the target.

Exhibit 1.4-8. Alternative 2 Growth Capacity

	Target: 2019-2023	Capacity 2023	Assumed for Study in EIS
Housing units	7,500	11,870	7,500
Jobs	4,770	2,960	2,960

Source: King County, 2021; BERK 2023.

Subarea Plans

Alternative 2 would incorporate the Urban Center Plan as adopted. It would implement the more modest heights in the plan. See [Exhibit 1.4-9](#). Since Alternative 2 also provides other housing opportunities that better meet housing affordability targets, it spreads growth both inside and outside of the Urban Center.

Exhibit 1.4-9. Downtown Urban Center Capacity and Assumptions – Alternative 2

	Capacity	Growth Assumption	Share of Target	Increase above Existing Dwellings
Residential units	2,176	1,375	18%	53%
Employment (jobs)	394	392	8%	Not applicable

Source: BERK 2023.

Other areas of growth outside the Urban Center would be in proportion to redevelopable and vacant land along First Avenue South and Ambaum Boulevard corridors and northeast Burien, including Boulevard Park.

Alternative 2 would incorporate the Final Draft of the Ambaum and Boulevard Park Community Plan¹ except that some of the implementing land use and zoning would match a blend of the preferred alternative modified by staff recommendations that respond to public engagement in Summer 2023. The Final EIS prepared for the Ambaum and Boulevard Park Community Plan evaluates the planning areas in detail and is not repeated in this ~~Draft~~ Final EIS for the Comprehensive Plan.

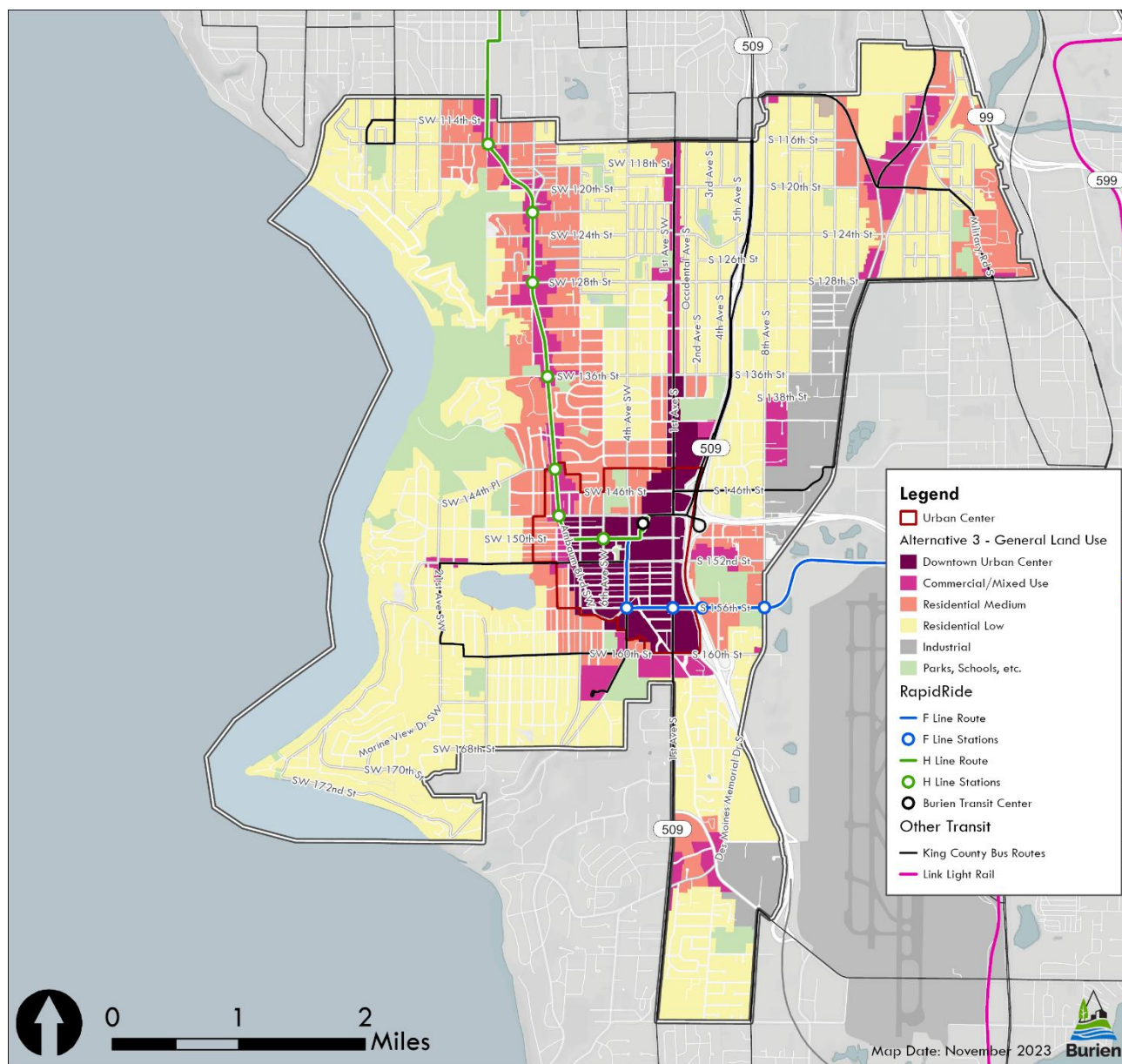
1.4.3.2 Alternative 3: Greater Downtown

Citywide

Alternative 3 updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien’s new vision for 2044. Alternative 3 Greater Downtown would also increase housing variety, affordability, and capacity including low density, moderate density, and high density housing and mixed use areas. The land use pattern would emphasize investment in the Urban Center and beyond along First Avenue South. The Northeast Redevelopment Area would be expanded westward for mixed use and northwards with light industrial job opportunities. See [Exhibit 1.4-10](#).

¹ See: <https://connect.burienwa.gov/final-draft-of-ambaum-and-boulevard-park-plan-published/>.

Exhibit 1.4-10. Alternative 3 Greater Downtown



Source: Makers, BERK, 2023

Alternative 3 Greater Downtown Future Land Use Map designations show primarily Residential Low, which allows a wide range of middle housing types. This alternative also calls out the Downtown Urban Center separate from other Commercial Mixed Use areas. It increases Industrial lands north of the current boundary. See [Exhibit 1.4-11](#).

Exhibit 1.4-11. Alternative 3 Greater Downtown Acres

Designations	Acres
Commercial/Mixed Use	359
Downtown Urban Center	260
Industrial	270
Parks, Schools, etc.	530
Residential Low	2,917
Residential Medium	854
Grand Total	5,191

Source: Makers, BERK, 2023.

With greater intensities in Residential Low areas as well as the Downtown Center and Industrial Areas, growth capacity is greater, and Alternative 3 can meet targets. See [Exhibit 1.4-12](#).

Exhibit 1.4-12. Alternative 3 Growth Capacity

	Target: 2019-2044	Urban Growth Capacity 2023	Assumed for Study in EIS
Housing units	7,500	11,674-14,107*	7,500
Jobs	4,770	4,730-5,115*	4,770

*with high-rise in Downtown Urban Center.

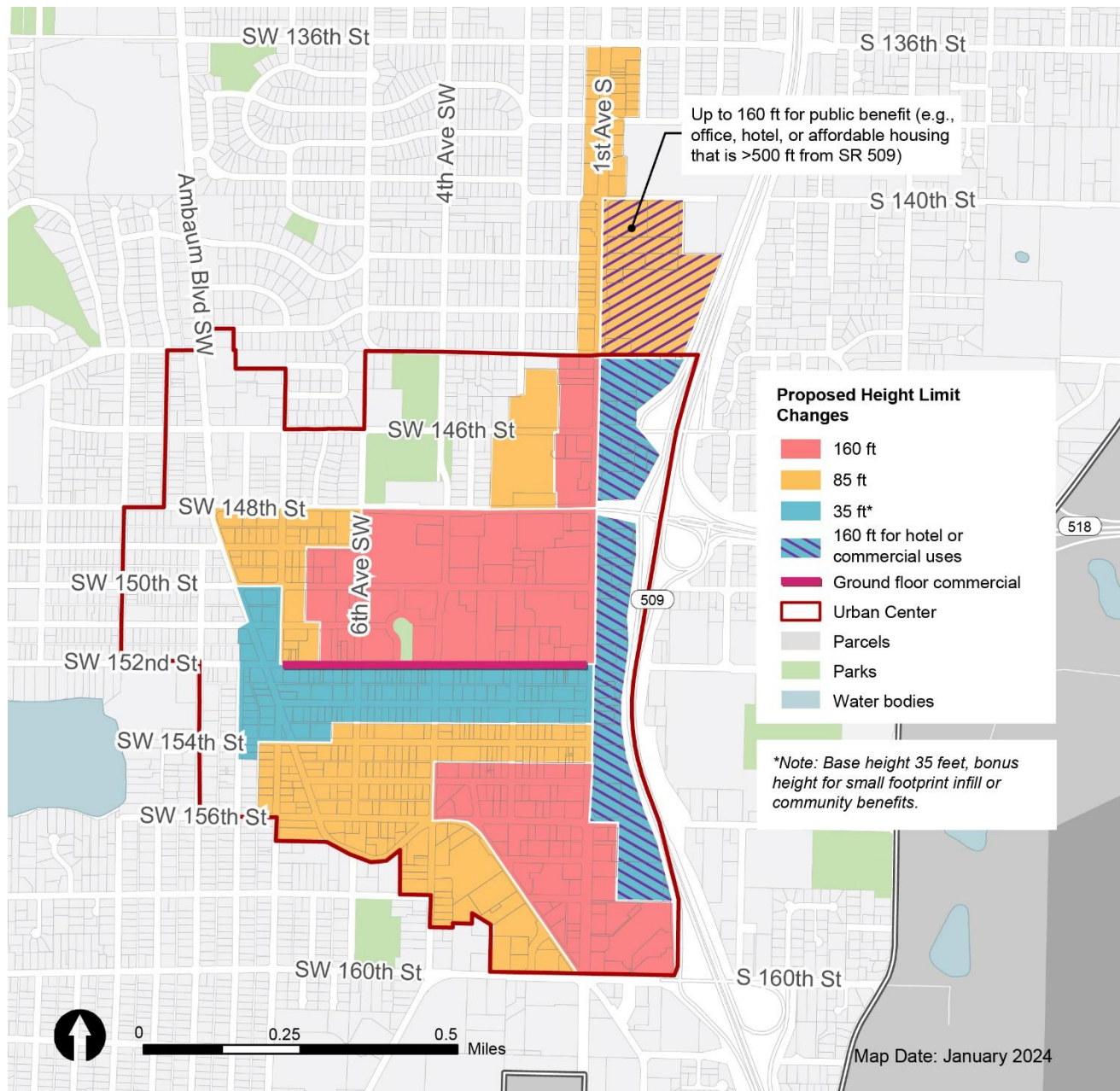
Source: King County, 2021; BERK 2023.

Alternative 3 has the capability to meet housing growth targets including by income band as further described in Chapter 3.

Subarea Plans

Alternative 3 would implement the Urban Center Plan. It proposes a range of heights consistent with existing heights and proposing greater heights above 8 stories that are the current maximum. About 85-160 feet could be allowed along First Avenue South, with some locations linking greater heights to desired units or public benefits. Some heights could be achieved for residential uses as long as they are located more than 500 feet from SR 509 (see [Draft EIS Exhibit 3.6-13](#) in Section 3.6.3. Noise Mitigation Measures). Similar to the Urban Center Plan, areas around 152nd Street outside of the Town Center would remain low to mid-rise to retain a walkable area with vibrant retail. See [Exhibit 1.4-13](#).

Exhibit 1.4-13. Downtown Urban Center



Source: Makers, 2024.

Growth capacity in the Downtown Urban Center is shared below both with heights similar to the current zoning and with the high-rise growth. See [Exhibit 1.4-14](#).

Exhibit 1.4-14. Downtown Urban Center Capacity and Assumptions – Alternative 3

	Capacity	Growth Assumption	Share of Target	Increase above Existing Units
Residential	1,738	1,117	15%	43%
<i>Residential High Rise</i>	3,675	1,954	26%	75%
Employment	317	319	7%	Not applicable
<i>Employment High Rise</i>	622	580	12%	Not applicable

Source: BERK 2023.

Like Alternative 2, Alternative 3 would incorporate the Final Draft of the Ambaum and Boulevard Park Community Plan² except that some of the implementing land use and zoning would match a blend of the preferred alternative modified by staff recommendations that respond to public engagement in Summer 2023. The Final EIS prepared for the Ambaum and Boulevard Park Community Plan evaluates the planning areas in detail and is not repeated in this ~~Draft Final~~ EIS for the Comprehensive Plan.

1.4.3.3 Preferred Alternative

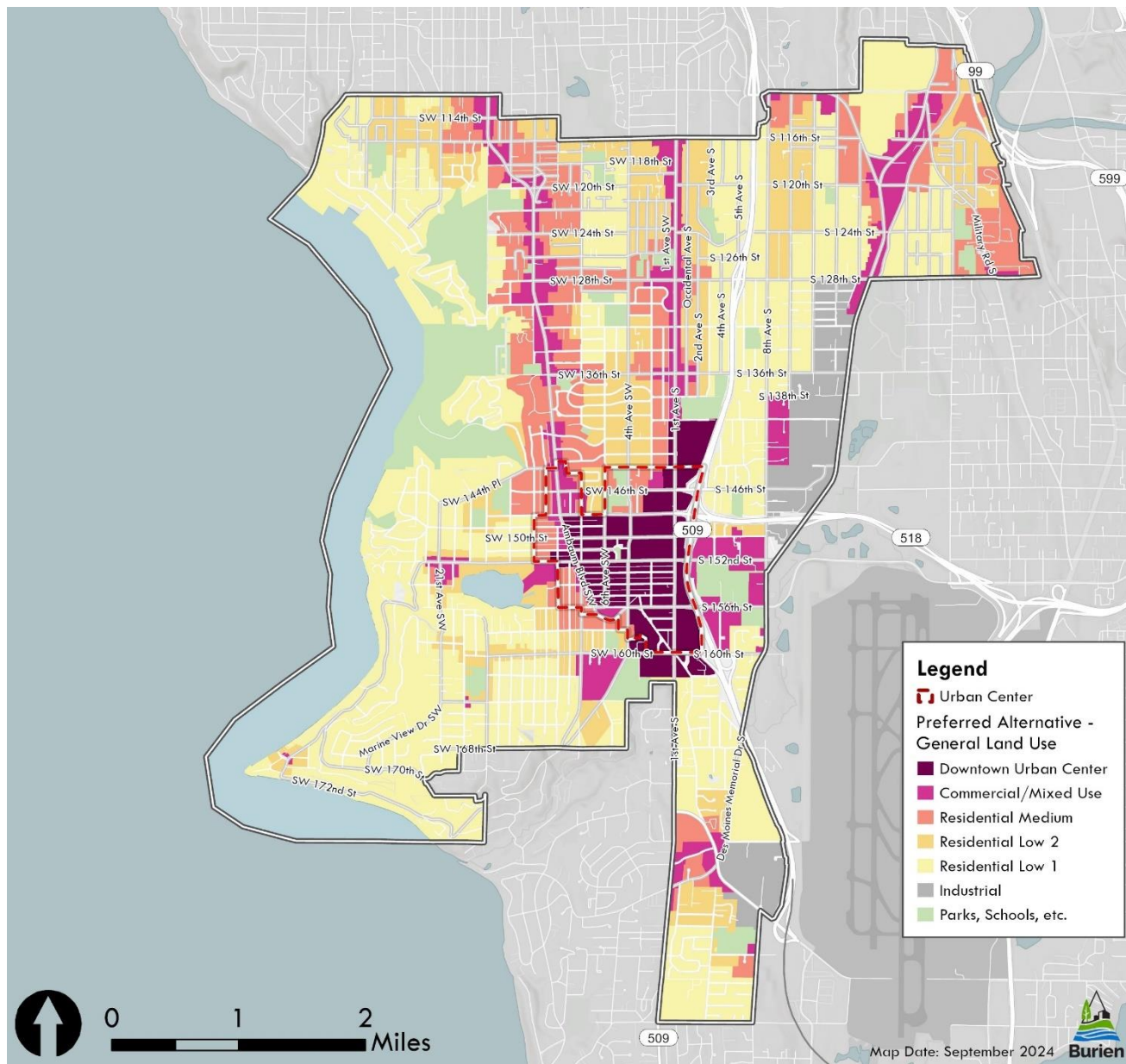
~~As part of the Final EIS a Preferred Alternative would be studied in the range of the Draft EIS Alternatives. It can mix or matches features studied with the Draft EIS Alternatives.~~

Citywide

~~The Preferred Alternative blends features of Alternatives 2 and 3. It reflects a Greater Downtown in the Urban Center and along First Avenue, as well as offering mixed use and multifamily opportunities in corridors and nodes in Ambaum and Boulevard Park as well as other locations. The plan shifted some density from the Ambaum corridor to First Avenue and other locations. It allows for middle housing (townhouses, multiplexes, accessory dwelling units, etc.) in Residential Low areas. It expands Industrial uses like Alternative 3 and other employment opportunities particularly in commercial and mixed use areas similar to the City's Economic Development Action Plan. It slightly reduces the Urban Center area on the north while adding mixed uses to reflect the Creative District adopted by Burien. It also adjusts the mix of multifamily and mixed uses in Sunnydale. Based on the greater potential building heights like Alternative 3, the Preferred Alternative provides housing capacity range of 11,402 - 14,274 new housing units, which is more than the 2044 target. The alternative provides capacity for 4,677 - 5,162 new jobs and meets 2044 job targets like Alternative 3. See [Exhibit 1.4-15](#) and [Exhibit 1.4-16](#).~~

² See: <https://connect.burienwa.gov/final-draft-of-ambaum-and-boulevard-park-plan-published/>.

Exhibit 1.4-15. Preferred Alternative – Future Land Use Plan



Source: Makers, BERK, 2024

Exhibit 1.4-16. Preferred Alternative Acres

Designations	Acres
<u>Commercial/Mixed Use</u>	<u>465</u>
<u>Downtown Urban Center</u>	<u>267</u>
<u>Industrial</u>	<u>270</u>
<u>Parks, Schools, etc.</u>	<u>531</u>
<u>Residential Low 1</u>	<u>2,219</u>

Designations	Acres
Residential Low 2	762
Residential Medium	717
Grand Total	5,230

Source: Makers, BERK, 2023.

With greater intensities in Residential Low areas as well as the Downtown Center and Industrial Areas, growth capacity is greater, and the Preferred Alternative can meet targets. See [Exhibit 1.4-17](#).

Exhibit 1.4-17. Preferred Alternative Growth Capacity

	Target: 2019-2044	Urban Growth Capacity 2023	Assumed for Study in EIS
Housing units	7,500	11,402 - 14,274*	7,500
Jobs	4,770	4,677 - 5,162*	4,770

*with high-rise in Downtown Urban Center.

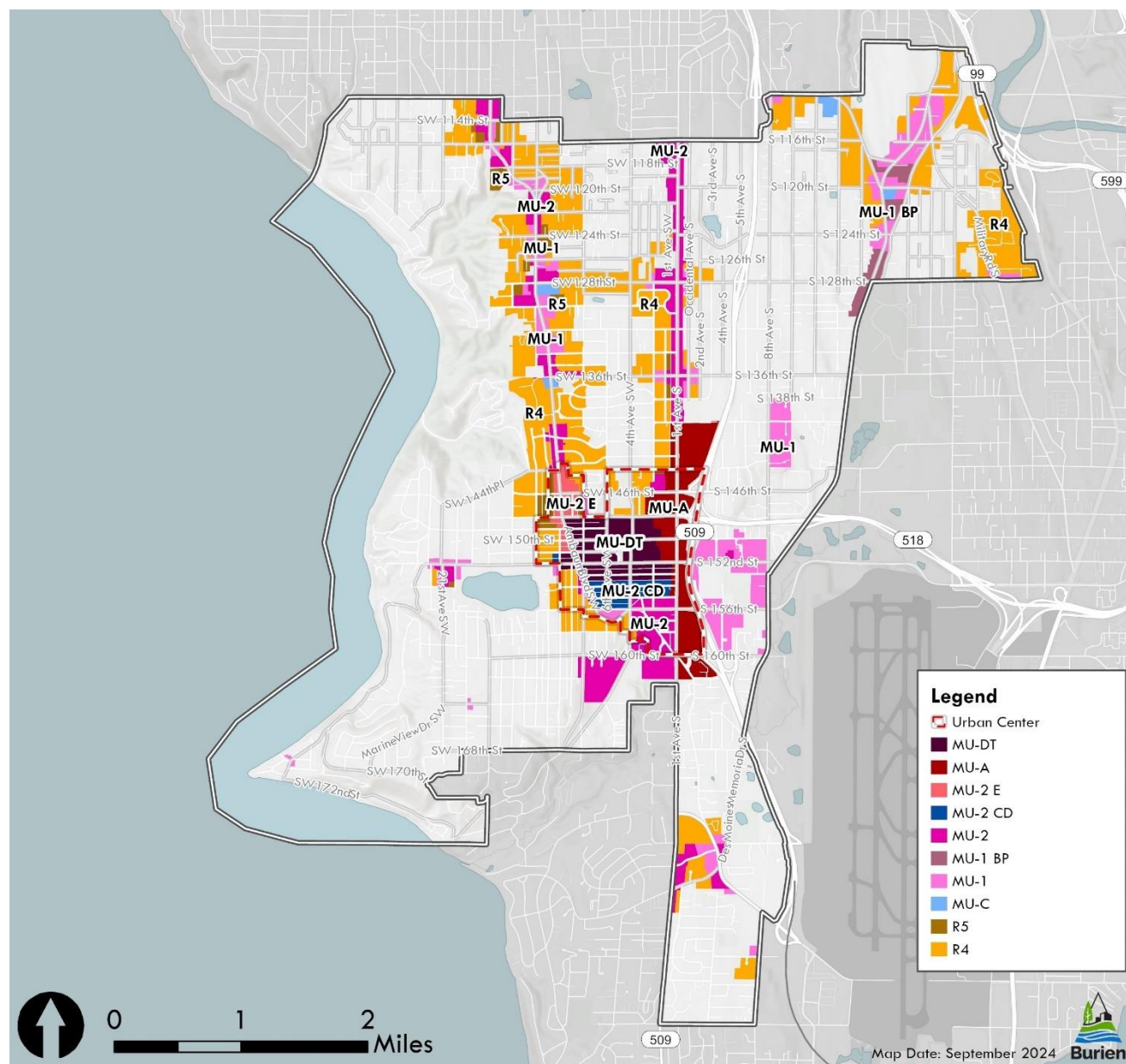
Source: King County, 2021; BERK 2024.

The Preferred Alternative has the capability to meet housing growth targets including by income band as further described in [Appendix C](#).

Zoning

As part of the Periodic Update, the City is required to implement zoning changes that are meant to help it meet its affordable housing targets. The City's current plan/zoning does not fully meet growth targets or address the need for the City to remove barriers to providing affordable housing at all income levels, particularly to address racially disparate impacts. To address the results of the affordability evaluation identified in the Draft Plan and Draft EIS issued in January 2024, the City has developed mixed use and multifamily zoning.

Exhibit 1.4-18. Preferred Alternative – Proposed Zoning Fall 2024



Source: Makers, BERK, 2024

Exhibit 1.4-19. Zoning Abbreviations and Definitions: Preferred Alternative (September 2024)*

Zone Abbreviation	Full Title
 MU-DT	<u>Downtown Mixed Use</u>
 MU-A	<u>Arterial Mixed Use</u>
 MU-2 E	<u>Mixed Use High Employment</u>

Zone Abbreviation	Full Title
 MU-2 CD	<u>Creative District Mixed Use</u>
 MU-2	<u>Mixed Use High</u>
 MU-1 BP	<u>Mixed Use Low Boulevard Park</u>
 MU-1	<u>Mixed Use Low</u>
 MU-C	<u>Community Mixed Use</u>
 R5	<u>Residential 5</u>
 R4	<u>Residential 4</u>

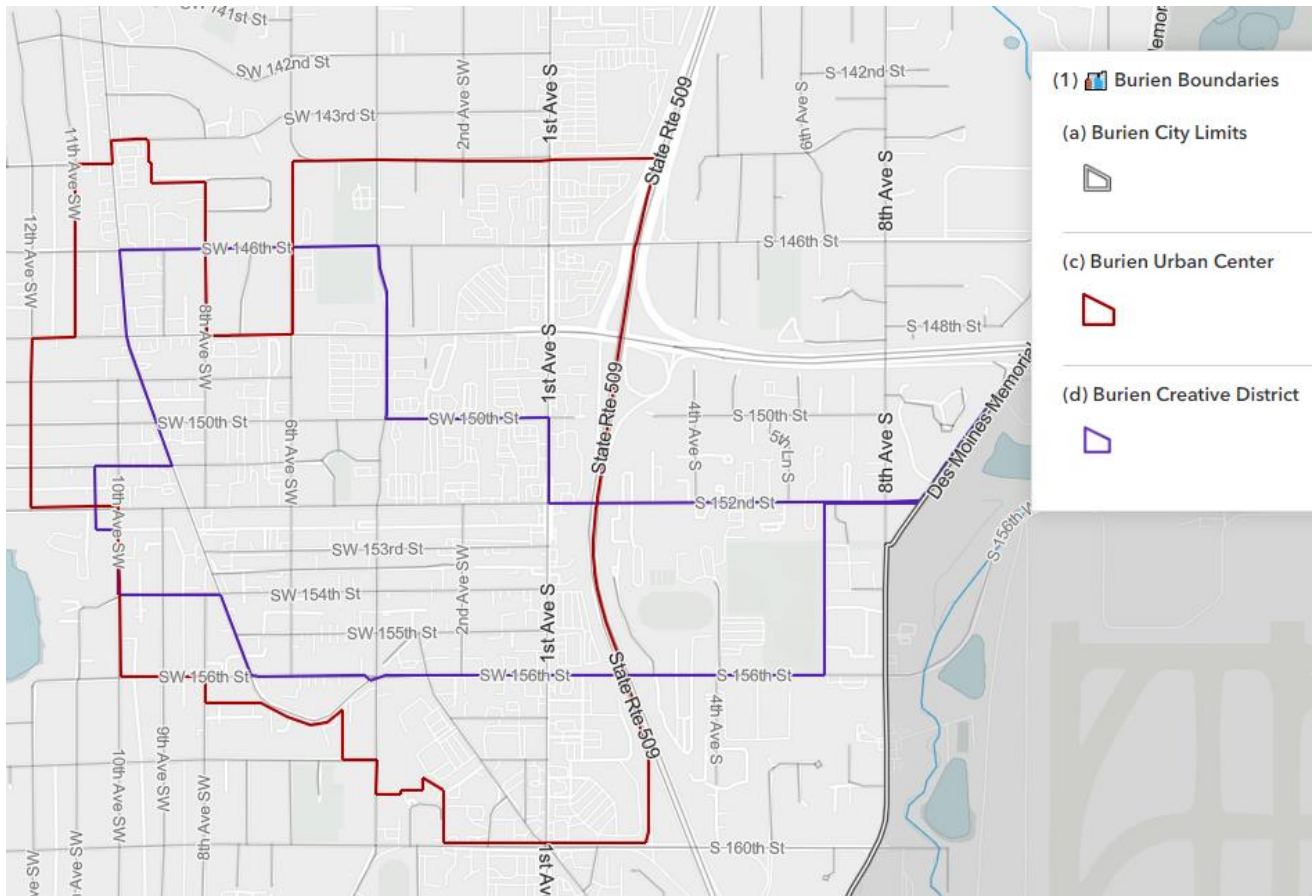
Source: Makers, 2024

A greater range of middle housing types is included Residential Low 2 and a moderate range of middle housing types is included Residential Low 1 in the Future Land Use Map. Zoning standards for middle housing would be developed by mid-2025 to allow for the range of unit types while considered tree canopy, greenspace, and infiltration.

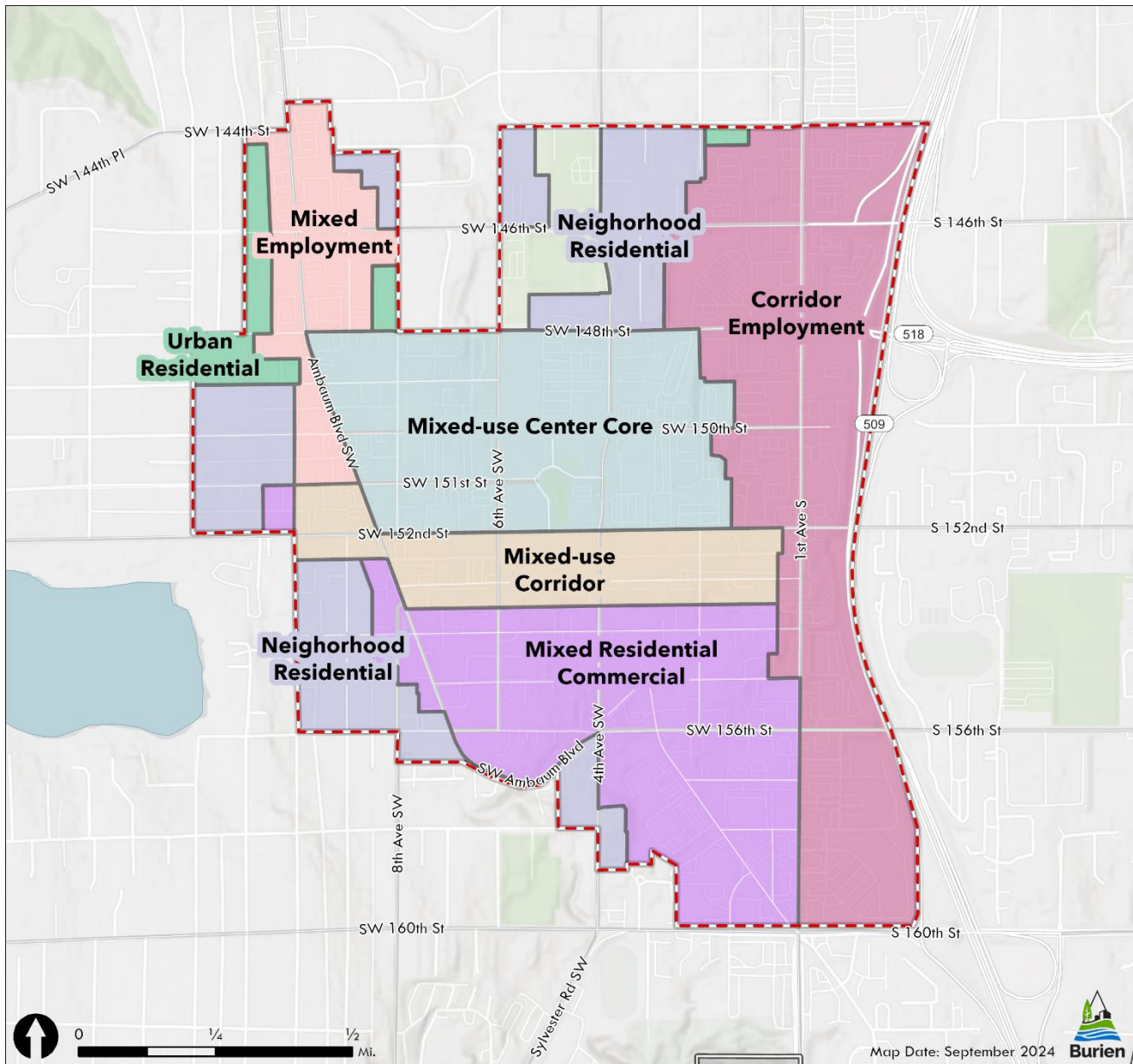
Subarea Plans

The Preferred Alternative would implement the Urban Center Plan, as well as amend its boundaries by 10 acres to avoid a block at SW 146th Street and 7th Avenue SW. The amendments to the Urban Center concept map would be adjusted to match the proposed zoning in the Urban Center better recognizing the Creative District certified by the Washington State Arts Commission.

Exhibit 1.4-20. Proposed Urban Center Boundaries and relationship to Creative District



Source: City of Burien, BERK 2024.

Exhibit 1.4-21. Urban Center Proposed Amended Concept Plan

Source: City of Burien, BERK 2024.

Like Alternative 3, the Preferred Alternative proposes a range of heights consistent with existing heights and proposing greater heights above 8 stories than are the current maximum. About 85-160 feet could be allowed along First Avenue South, with some locations linking greater heights to desired units or public benefits. Some heights could be achieved for residential uses as long as they are located more than 500 feet from SR 509 (see Draft EIS Section 3.6.3. Noise Mitigation Measures). Similar to the Urban Center Plan, areas around 152nd Street outside of the Town Center would remain low to mid-rise to retain a walkable area with vibrant retail.

Growth capacity in the Downtown Urban Center is shared below both with heights similar to the current zoning and with the high-rise growth. See Exhibit 1.4-22.

Exhibit 1.4-22. Downtown Urban Center Capacity and Assumptions – Alternative 3

	<u>Capacity</u>	<u>Growth Assumption</u>	<u>Share of Target</u>	<u>Increase above Existing Units</u>
<u>Residential</u>	<u>2,298</u>	<u>1,513</u>	<u>31%</u>	<u>88%</u>
<u>Residential High Rise</u>	<u>3,204</u>	<u>1,691</u>	<u>43%</u>	<u>123%</u>
<u>Employment</u>	<u>799</u>	<u>799</u>	<u>16%</u>	<u>Not applicable</u>
<u>Employment High Rise</u>	<u>924</u>	<u>856</u>	<u>19%</u>	<u>Not applicable</u>

Source: BERK 2023.

Like other Action Alternatives the Preferred Alternative would incorporate the proposed Ambaum and Boulevard Park Community Plan except that some of the implementing land use and zoning would match a blend of the preferred alternative modified by Planning Commission Alternatives. The Final EIS prepared for the Ambaum and Boulevard Park Community Plan evaluates the planning areas in detail and is not repeated in this Draft EIS for the Comprehensive Plan.

Planned Action

The proposed Housing Element includes a policy supporting removal of environmental barriers:

Housing Policy 4.2-17 Remove barriers to development of affordable and market rate housing. Use creative SEPA tools such as exemption thresholds, infill and mixed-use exemptions, or planned actions to encourage housing and streamline permitting. Ensure that City fees and permitting time are set at reasonable levels so they do not adversely affect the cost of housing.

The Draft EIS identified the potential to facilitate the environmental review process for development in the Urban Center that fits within development limits and mitigation measures for a given area. Similarly the Ambaum Boulevard Park EIS addressed that tool for those neighborhoods.

A planned action provides more detailed environmental analysis during an areawide planning stage rather than at the project permit review stage. Designating a planned action area identifies area-wide impacts and mitigation measures before development occurs, and then streamlines environmental review for future development proposals. Planned actions are development proposals that fall within the scope of the environmental analysis undertaken in support of a planned action ordinance. Planned actions can cover a range of land uses and service or infrastructure investments. (RCW 43.21c.440)

The City adopted a Planned Action for the Northeast Redevelopment Area focused on industrial uses in 2009.³ A similar infill exemption but focused on housing and mixed uses is allowed in the current Urban Center per RCW 43.21c.229.

A planned action is proposed for the Downtown Urban Center and extending in parts of 1st Avenue S. It is based on the Draft EIS Alternatives and the Planning Commission's Preferred Alternative.

A planned action for Ambaum Boulevard Park has been drafted based on the 2023 EIS for that subarea plan area and revised for the public hearing to reflect the Planning Commission's recommendations on the Preferred Alternative future land use plan and zoning.

Multifamily Tax Exemption

The Multifamily Property Tax Exemption (MFTE) program is authorized by Chapter 84.14 RCW which is intended to:

- ▶ Address the lack of desirable, convenient, attractive, and livable market-rate and affordable housing units in many urban centers to meet needs for growth.
- ▶ Add needed residential units can support a mixed-income community and meet corresponding planning goals under the Growth Management Act (RCW 36.70A.020).
- ▶ Promote housing growth in urban centers can help to reduce urban sprawl by reducing the need for residential development in other areas.
- ▶ Encourage new multiple-unit housing development to support economic investment and recovery, and the creation of family-wage jobs, in urban centers.
- ▶ Stimulate the construction of new multifamily housing and the rehabilitation of existing vacant and underutilized buildings for multifamily housing in the designated residential target areas.

The Burien Housing Action Plan recommended an update of the MFTE program to extend it beyond the Downtown along transit routes. The Planning Commission recommended extending the program to Ambaum corridor and Boulevard Park areas as well as other multifamily areas in the city.

1.4.4 Comparison of Alternatives

Exhibit 1.4-23 below compares the alternatives studied in this EIS.

³ The Comprehensive Plan includes a more extended industrial area than zoned. The Preferred Alternative is similar in its extent and intent. For the master plan upon which the 2009 Planned Action is based, see: https://www.burienwa.gov/business/community_development/planning_initiatives/northeast_redevelopment_area.

Exhibit 1.4-23. Summary of Alternatives

Feature	Alternative 1: No Action	Alternative 2 Neighborhood Centers	Alternative 3 Greater Downtown	<u>Preferred Alternative</u>
Updates Comprehensive Plan	No	Yes	Yes	<u>Yes</u>
Incorporate Urban Center Plans	Partial	Yes, as Proposed	Yes, Amended	<u>Yes, Amended</u>
Incorporates Ambaum Boulevard Park Community Plan	No	Yes, Preferred with Staff Recommendations	Yes, Preferred with Staff Recommendations	<u>Yes, Preferred with Staff Recommendations</u>
Update Development Regulations	No	Yes	Yes	<u>Yes</u>
Updates Transportation Master Plan	No	Yes	Yes	<u>Yes</u>
Provides Housing Capacity for Targets	Partial	Yes	Yes	<u>Yes</u>
Provide Capacity for Affordable Housing Targets	Partial	Yes	Yes	<u>Yes</u>
Provide Capacity for Job Targets	Limited	Partial	Yes	<u>Yes</u>
Provides SEPA Facilitation Tools	No	Yes	Yes	<u>Yes</u>

Sources: BERK, 2023.

1.4.5 Future Alternatives

As part of the Final EIS a Preferred Alternative would be studied in the range of the Draft EIS Alternatives. It can mix or match features studied with the Draft EIS Alternatives.

1.5 Major Issues to Be Resolved

The key issues facing decision makers include:

- Creation of a growth concept carried forward in plans and regulations that meets the vision and values of Burien and meets state and regional requirements including allocated targets and policies.

- ▶ Identification of the infrastructure that improves mobility and resilience, and improve natural drainage with green infrastructure, and add parks and recreation.
- ▶ Approval of development regulations that implement the Comprehensive Plan goals and land use plan, resulting in housing for all needs and incomes.
- ▶ Approval of Urban Center zoning and a Planned Action Ordinance or Infill Exemption to help incentivize growth while mitigating impacts in the Urban Center.

1.6 Summary of Impacts & Mitigation Measures

1.6.1 Natural Environment

1.6.1.1 How did we analyze the Natural Environment?

This EIS addresses the natural environment including earth, water, plants and animals. The analysis of the natural environment inventory included City of Burien Critical Areas Map, prior environmental reports, and review of State and federal database information to review and compare the environmental context of Burien to plan alternatives for consideration of significant impacts and potential mitigation measures.

Thresholds of significance include:

Earth

- ▶ Increase risks of a geologic hazard that exposes population to injury or substantial property damage
- ▶ Erosion that is likely to not be contained on future development sites

Water Resources

- ▶ Loss of wetland and stream habitat with a focus on water quality and quantity
- ▶ Reduction in groundwater recharge
- ▶ Reduction in water quality
- ▶ Impact to functions and values that are more than moderate

Plants and Animals

- ▶ Loss of habitat affecting priority species
- ▶ Fragmentation of wildlife corridors
- ▶ Likelihood of jeopardizing a plant or animal population that is not currently vulnerable

All Critical Areas

- ▶ Inconsistency with best available science

1.6.1.2 What impacts did we identify?

Alternative 1: No Action

This alternative Continues the current Comprehensive Plan and zoning regulations. Under this plan, an estimated total housing capacity of 6,499 units would be added within the city. This alternative disperses growth throughout the city, with the most housing provided in the Urban Center.

- ▶ Erosion and Landslide Hazards: Erosion and landslide hazards are minimal for the downtown area, primarily associated with coastal shoreline and bluffs. Any additional development or redevelopment in currently developed areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations.
- ▶ Seismic Hazards: This is primarily associated with coastal areas and south of downtown. Future development would be subject to critical area regulations and the building code to address seismic safety.
- ▶ Shorelines, Streams, Rivers, and Lakes: Moderate residential growth is anticipated within the developed central and west areas of the City. An increase in re-development is not likely to significantly impact surface water areas in the City center through a slight increase in impervious surface within the basins of mapped streams. High growth potential is not indicated for the marine or freshwater (Lake Burien) shorelines. The central area of the city has projected development under current policies and with a high percentage of impervious surface; therefore, new direct impacts to surrounding streams and natural areas would be avoided with more limited redevelopment in this alternative and adherence to stormwater management regulations with redevelopment is likely to have some improvement to existing water quality and flow control conditions. Existing stormwater systems deficient in current treatment and flow control functions may remain in comparison to other options if not re-developed.
- ▶ Wetlands: The moderate residential growth anticipated under Alternative 1 would not impact known wetland areas. Central and eastern areas of the City are already developed with a high percentage of impervious surfaces. Wetland habitat is not assumed to be impacted directly, and water quality is not assumed to not be significantly impacted above existing conditions as re-development provides an increase in water quality protections; therefore, it is unlikely that wetland functions will be significantly impacted by implementation of current codes and policies.
- ▶ Plants: Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as critical areas under development regulations. Any additional development or redevelopment ~~in~~ outside of critical areas is unlikely to be significantly affected by erosion or landslides under the existing critical areas regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are expected to increase tree canopy for urban and other areas of the City.

- ▶ **Animals:** Habitats of national, regional and local importance occur along the Puget Sound shoreline. Corridors such as Salmon Creek, along Puget Sound and along Walker and Miller Creek are primary habitat locations for wildlife. Internal to developed areas of the City, parks and open space areas such as Lake Burien also provide habitat for urban wildlife species. With continued growth in Alternative 1 the frequency and intensity of noise and other pollutants is expected to have further adverse repercussions on wildlife, and implementation of codes and policies to protect and restore habitats is also anticipated to have benefit.

Alternative 2: Neighborhood Centers

Under Alternative 2, low density residential, moderate density residential, and high-density housing and mixed-use areas characterize different portions of the city, with a focus of higher intensity uses around neighborhood centers. Development intensity avoids shoreline where majority of natural environment resources occur. Under Alternative 2, an estimated total housing capacity of 11,870 units, which allows the city to meet its target of 7,500 dwellings by 2044. This alternative primarily increases growth in the distributed neighborhood centers across the city as well as in the Urban Center.

- ▶ **Erosion and Landslide Hazards:** Erosion and landslide hazards are minimal for the downtown area, primarily associated with coastal shoreline and bluffs. Any additional development or redevelopment in currently developed areas is unlikely to be significantly affected by erosion or landslides under the existing critical areas regulations.
- ▶ **Seismic Hazards:** More housing growth of 7,500, about 1,000 more dwellings than Alternative 1, is anticipated in the city under Alternative 2 during the planning period as well as more employment. Future development would be subject to critical area regulations and the building code to address seismic safety.
- ▶ **Shorelines, Streams, Rivers, and Lakes:** Moderate residential growth is anticipated within the developed central and west areas of the City. Residential Low is proposed near marine and freshwater shorelines and is not anticipated to result in high growth potential; shoreline and critical area regulations (including coastal areas and Lake Burien) would apply to any Future Land Use designation and provide for shoreline ecological protection, public access, and preferred uses.—An increase in re-development is not likely to significantly impact surface water areas in the Urban Center through a slight increase in impervious surface within the basins of mapped streams. This alternative up-zones corridors and the Urban Center that has projected development in an area with a high percentage of impervious surface and drainage systems designed to older standards that are not as effective as current standards; therefore, impacts to surrounding streams will be avoided with redevelopment and adherence to stormwater management regulations with for such redevelopment. Additionally, future required adoption by the City of Department of Ecology's 2024 stormwater regulations will provide more comprehensive stormwater management for redevelopment, meaning redevelopment will enhance the condition of receiving bodies of water. Greater maintenance and operational cost for new development stormwater systems is also expected to be an impact of urban re-development.

- ▶ **Wetlands:** The moderate residential growth anticipated under Alternative 2 would not impact known wetlands. Central and eastern areas of the city are already highly developed and have a high percentage of impervious surfaces. Wetland habitat is not assumed to be impacted directly, and water quality would not be significantly impacted as re-development provides an increase in water quality protections; therefore, it is unlikely that wetlands be significantly impacted by the Neighborhood Centers Alternative.
- ▶ **Plants:** Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as Shoreline and critical areas under development regulations. Any additional development or redevelopment in outside of critical areas is unlikely to be significantly affected by erosion or landslides under the existing critical areas regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are intended to increase tree canopy for urban areas and other areas of the City. Redevelopment in Alternative 2 is expected to occur in rezoned areas and to require street tree and other plantings and result in an increase of future tree canopy for redeveloped urban areas in the City.
- ▶ **Animals:** Habitats of national, regional and local importance occur in and along the Puget Sound shoreline. Corridors such as Salmon Creek, along Puget Sound and along Walker and Miller Creek are primary habitat locations for wildlife. Internal to developed areas of the City, parks and open space areas such as Lake Burien also provide habitat for urban wildlife species. With continued growth the frequency and intensity of noise and other pollutants is expected to have further adverse repercussions on wildlife. However, implementation of codes and policies to protect and restore habitats would also have benefit.

Alternative 3: Greater Downtown

Alternative 3 updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien's new vision for 2044. No impacts identified assuming critical areas code and stormwater management regulations are met. Development intensity avoids shoreline where majority of natural environment resources occur.

Under Alternative 3, an estimated total housing capacity of 11,674-14,107 units would be added within the city allowing the target of 7,500 new housing units. This alternative primarily increases growth in the center of city. This alternative would have the most employment growth above Alternatives 1 and 2 and meeting employment growth targets.

- ▶ **Erosion and Landslide Hazards:** Erosion and landslide hazards are minimal for the Urban Center area, primarily associated with coastal shoreline and bluffs. Any additional development or redevelopment in currently developed areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations.
- ▶ **Seismic Hazards:** Mapped hazards are primarily associated with coastal areas and south of downtown. This area of seismic risk occurs in the Five Corners area associated with the Greater Downtown Alternative and would need to be considered for future higher density buildings in that area.

- ▶ Shorelines, Streams, Rivers, and Lakes: Moderate residential growth is anticipated within the developed central and west areas of the City. Residential Low is proposed near marine and freshwater shorelines and is not anticipated to result in high growth potential; shoreline and critical area regulations (including coastal areas and Lake Burien) would apply to any Future Land Use designation and provide for shoreline ecological protection, public access, and preferred uses. An increase in re-development is not likely to significantly impact surface water areas in the City Center through a slight increase in impervious surface within the basins of mapped streams. The central area of the city ~~that~~ has projected development in an area with a high percentage of impervious surface; therefore, impacts to surrounding streams will be avoided with redevelopment and adherence to stormwater management regulations ~~with~~ for such redevelopment. Additionally, future required adoption by the City of Department of Ecology's 2024 stormwater regulations will provide more comprehensive stormwater management for redevelopment, meaning redevelopment will enhance the condition of receiving bodies of water. Greater maintenance and operational cost for new development stormwater systems is expected to be an impact of urban re-development.
- ▶ Wetlands: The moderate residential growth anticipated under Alternative 3 would not impact known wetlands. Central and eastern areas of the city are already highly developed and is mostly impervious surfaces. Wetland habitat is not assumed to be impacted directly, and water quality would not be significantly impacted as re-development provides an increase in water quality protections to an area with a high percentage of existing impervious surfaces; therefore, it is unlikely that wetlands be significantly impacted by redevelopment outside of critical areas.
- ▶ Plants: Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as Critical Areas under development regulations. Any additional development or redevelopment ~~in~~ outside of Critical Areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are expected to increase tree canopy for urban and other areas of the City. Redevelopment in Alternative 3 is expected to occur in mostly downtown and urban up-zoned areas and to require street tree and other plantings and result in some increase of future tree canopy for redeveloped urban areas in the City.
- ▶ Animals: habitats of national, regional and local importance occur along the Puget Sound shoreline. Corridors such as Salmon Creek, along Puget Sound and along Walker and Miller Creek are primary habitat locations for wildlife. Internal to developed areas of the City, parks and open space areas such as Lake Burien also provide habitat for urban wildlife species. With continued growth the frequency and intensity of noise and other pollutants is expected to have further adverse repercussions on wildlife. However, implementation of codes and policies to protect and restore habitats would also have benefit.

Preferred Alternative

Like Alternatives 2 and 3 the Preferred Alternative updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien's new vision for 2044. No

impacts are identified assuming critical areas code and stormwater management regulations are met. Development intensity avoids shoreline where majority of natural environment resources occur.

Under the Preferred Alternative an estimated total housing capacity of 11,402 - 14,274 units would be added within the city allowing the target of 7,500 new housing units. This alternative primarily increases growth in the center of city like Alternative 3 as well as within nodes and corridors like Alternative 2. This alternative would meet employment growth targets like Alternative 3.

- ▶ Erosion and Landslide Hazards: Erosion and landslide hazards are minimal for the Urban Center area, primarily associated with coastal shoreline and bluffs. Any additional development or redevelopment in currently developed areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations.
- ▶ Seismic Hazards: Mapped hazards are primarily associated with coastal areas and south of downtown. This area of seismic risk occurs in the Five Corners area associated with the Greater Downtown Alternative and would need to be considered for future higher density buildings in that area.
- ▶ Shorelines, Streams, Rivers, and Lakes: Moderate residential growth is anticipated within the developed central area of the City as well as surrounding developed corridors. With two small pockets of Commercial/Mixed Use around Lake Burien, mostly Residential Low is proposed near marine and freshwater shorelines and these designations overall are not anticipated to result in high growth potential. Shoreline and critical area regulations (including coastal areas and Lake Burien) would apply to any Future Land Use designation and provide for shoreline and habitat ecological protection, public access, and preferred uses. An increase in re-development is not likely to significantly impact surface water areas in the City Center through a slight increase in impervious surface within the basins of mapped streams. The corridors and the central area of the city have projected development in an area with a high percentage of impervious surface; therefore, impacts to surrounding streams will be avoided with redevelopment and adherence to stormwater management regulations. Additionally, future required adoption by the City of Department of Ecology's 2024 stormwater regulations will provide more comprehensive stormwater management for redevelopment, meaning redevelopment will enhance the condition of receiving bodies of water. Greater maintenance and operational cost for new development stormwater systems is expected to be an impact of urban re-development.
- ▶ Wetlands: The moderate residential growth anticipated under the Preferred Alternative would not impact known wetlands. Central and eastern areas of the city are already highly developed and is mostly impervious surfaces. Wetland habitat is not assumed to be impacted directly, and water quality would not be significantly impacted as re-development provides an increase in water quality protections to an area with a high percentage of existing impervious surfaces; therefore, it is unlikely that wetlands be significantly impacted by redevelopment outside of critical areas.
- ▶ Plants: Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as Shoreline and Critical Areas under development regulations. Any additional development or redevelopment in outside of Critical

Areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are expected to increase tree canopy for urban and other areas of the City. Redevelopment in the Preferred Alternative is expected to occur in mostly downtown and urban up-zoned areas and to require street tree and other plantings and result in some increase of future tree canopy for redeveloped urban areas in the City.

- ▶ Animals: habitats of national, regional and local importance occur along the Puget Sound shoreline. Corridors such as Salmon Creek, along Puget Sound and along Walker and Miller Creek are primary habitat locations for wildlife. Internal to developed areas of the City, parks and open space areas such as Lake Burien also provide habitat for urban wildlife species. With continued growth the frequency and intensity of noise and other pollutants is expected to have further adverse repercussions on wildlife. However, implementation of codes and policies to protect and restore habitats would also have benefit.

1.6.1.3 What is different between the alternatives?

- ▶ Alternative 1: No Action—Continues the current Comprehensive Plan and zoning regulations. No significant impacts identified assuming critical areas and stormwater management regulations are met but improvements to existing stormwater and tree canopy deficiencies may have less improvement in this option in comparison to Alternatives 2 and 3 with redevelopment.
- ▶ Alternative 2: Neighborhood Centers — Updates the Comprehensive Plan and zoning code to meet new state and regional requirements, and adds greater housing variety, affordability, and capacity including low density, moderate density, and high-density housing and mixed-use areas. No significant impacts identified assuming critical areas code and stormwater management regulations are met. Development intensity avoids shorelines and bluffs where majority of natural environment resources occur. Rezoning of the central area of the city may lead to redevelopment and improvement in stormwater management and tree canopy with redeveloped parcels.
- ▶ Alternative 3: Greater Downtown — Updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien’s new vision for 2044. No significant impacts identified assuming critical areas code and stormwater management regulations are met. Development intensity avoids shoreline where majority of natural environment resources occur. Downtown focused development avoids shorelines and bluffs where majority of natural environment resources occur. Rezoning of the central area of the city may lead to redevelopment and improvement in stormwater management and tree canopy with redeveloped parcels.
- ▶ Preferred Alternative - Updates the Comprehensive Plan and zoning code to meet state and regional policies and requirements and Burien’s new vision for 2044. No significant impacts identified assuming critical areas code and stormwater management regulations are met. Development intensity avoids shoreline where majority of natural environment resources occur. Downtown focused development avoids shorelines and bluffs where majority of natural

environment resources occur. Balanced rezoning of both the central area of the city as well as along corridors and neighborhood nodes may lead to redevelopment and improvement in stormwater management and tree canopy with redeveloped parcels.

1.6.1.4 What are some solutions or mitigation for impacts?

Mitigation for natural environment impacts would need to meet resource specific requirements. These requirements are detailed in the Burien Zoning Code to meet state and regional policies and requirements.

1.6.1.5 With mitigation, what is the ultimate outcome?

With adherence to avoidance of impact, minimization of impacts, and mitigation for impacts, the ultimate outcome is no net loss of ecological function.

1.6.2 Air Quality

1.6.2.1 How did we analyze Air Quality?

Consistent with the above descriptions, the thresholds of significance utilized in this impact analysis include:

- ▶ Air Pollution: Growth focused in areas with high exposure to air pollution.
- ▶ Per Capita greenhouse gas (GHG) emissions: Increase in GHG emissions on a per capita basis.
- ▶ Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.

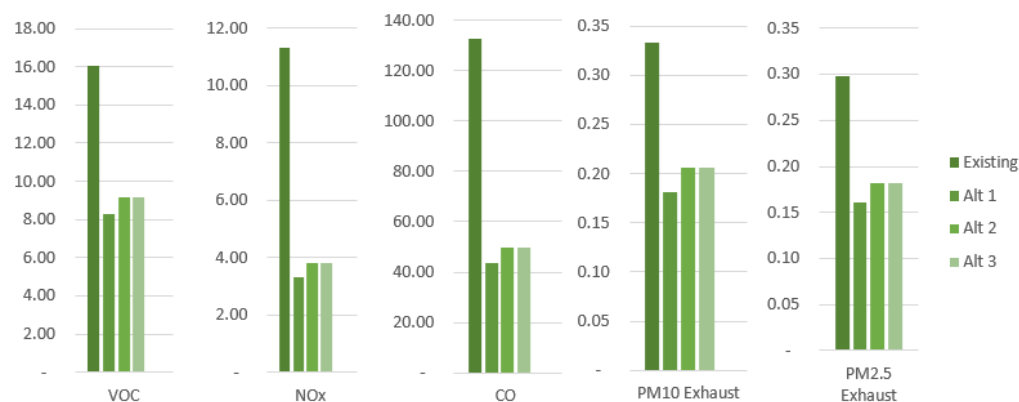
1.6.2.2 What impacts did we identify?

Construction Related Emissions: Future growth under any alternative would result in development of middle housing in low density areas and multifamily and mixed uses along existing and future transit routes and nodes. Most development projects in the city would entail demolition and removal of existing structures or parking lots, excavation and site preparation, and construction of new buildings. Fugitive dust emissions are typically generated during construction phases. Activities that generate dust include building and parking lot demolition, excavation, and equipment movement across unpaved construction sites. Criteria air pollutants would be emitted during construction activities from demolition and construction equipment, much of it diesel-powered, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites.

Because of the combination of regulatory improvements and the Climate Action Plan strategies for a circular economy and King County recycling and diversion requirements, construction related GHG emissions associated with all alternatives would result in minor adverse climate impacts.

Operations Emissions – On-Road Transportation: Transportation-related air pollutant emissions under existing conditions and each of the three alternatives are presented in [Exhibit 1.6-1](#). As can be seen, regional emissions of VOC, CO, and NO_x under Alternatives 2 and 3 would be substantially less compared to existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition would outweigh the projected increase in vehicle miles travelled (VMT). This would result in a beneficial future air quality outcome. As indicated in [Exhibit 1.6-1](#) transportation emissions from Alternatives 2 and 3 would be slightly higher than those from Alternative 1, mostly because reductions in transportation emissions (from existing background conditions) realized from implementation of Alternatives 2 and 3 would be slightly less than those of Alternative 1. Since the transportation review finds that the Preferred Alternative would yield the impacts previously identified for Alternative 3, the expected criteria pollutant emissions are anticipated to be similar to Alternative 3.

Exhibit 1.6-1. Transportation Exhaust Criteria Pollutant Emissions (tons/year)



Source: Kimley Horn, 2023.

Operations – Indirect Effects: Living near airports and roadways may increase exposure to hazardous air pollutants (HAPs) and toxic air pollutants (TAPs) such as ultrafine particles. Under all three Draft EIS alternatives and the Preferred Alternative, increased growth is projected along high-traveled roadways and within the Sea-Tac Airport flight path, resulting in equal concerns regarding the exposure of more persons to HAPs and TAPs. Neither the City nor the State regulates emissions from vehicles and aircraft. Without EPA action to significantly improve vehicle and aircraft emissions, the City is limited to siting considerations and implementation of development standards to limit the exposure of future populations to increased levels of HAPs and TAPs.

1.6.2.3 What is different between the alternatives?

Changes in operational GHG emissions associated with growth under the alternatives would result from increases in vehicle miles traveled (VMT) and improvements to the vehicle fleet, electrical and natural gas usage, and solid waste generation.

Alternative 1: The transportation emissions would be the lowest among any of the three alternatives, resulting in the greatest reductions in emissions compared to existing emissions. This is largely as the result of Alternative 1 having the lowest VMT compared to other alternatives which reflects the lowest overall housing growth target and the concentration of that growth and lowest overall employment growth.

Alternative 2: The transportation emissions reductions from existing emissions due to implementation of Alternative 2 is assumed to be the same as Alternative 3 and would be lower than Alternative 1, which reflects the highest overall housing growth target. Reflecting the highest overall housing growth target, the building and waste emissions associated with Alternative 2 would be higher than Alternative 1.

Alternative 3: Regional emissions of VOC, CO, and NO_x under Alternative 3 would be substantially less compared to existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition would outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. Transportation emissions from Alternative 3 would be slightly higher than those from Alternative 1, mostly due to the highest housing and employment growth targets. The Preferred Alternative is consistent with Alternative 3 in that it meets employment growth targets as well as housing targets; GHG emissions are likely anticipated to be the same under the Preferred Alternative as for Alternative 3.

The alternatives would decrease per capita GHG rates compared to existing per capita rates. See [Exhibit 1.6-2](#).

Exhibit 1.6-2. GHG Emissions (MTCO₂e) compared to existing per capita rate of 3.21

	Alternative 1	Alternative 2	Alternative 3 / Preferred
Transportation	-3,870	-3,067	-3,067
Energy	3,178	4,622	5,862
Waste	2,330	2,811	3,048
Total Alternative	1,638	4,366	5,842
Population Growth Estimate	15,988	18,450	18,450
Per Capita GHG Emissions	0.10	0.24	0.32

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.46 persons per household
Source: Kimley-Horn, 2023

1.6.2.4 What are some solutions or mitigation for impacts?

Although mitigation strategies are not required due to a lack of significant adverse impact findings, to address the potential exposure of residences and other sensitive land uses to air toxic risk areas, discussion of potential mitigation measures is included below.

- ▶ Replacing fossil-fueled vehicles with ones powered by renewable or cleaner sources of energy (electric, hydrogen, etc.) would result in reductions in CO, NOx, and VOCs.
- ▶ Building energy emissions are a large source of GHG emissions. Decarbonization of buildings by eliminating the combustion of natural gas and other fossil fuels would reduce residential and commercial building emissions (CARB, 2022). All-electric space and water heating is required by the 2022 Washington Energy Code. However, all-electric cooking appliances has not been required. Combined with increasing energy efficiency, building electrification in new buildings would reduce building-related emissions.

On-road and aviation activity are main sources of pollutant emissions. The following strategies can reduce the potential levels of air toxics:

- ▶ Where the City has authority to do so, the designation of truck routes serving industrial and manufacturing areas away from residential areas would increase buffer areas between some residential neighborhoods and roadways highly travelled by diesel trucks.
- ▶ Preserve and enhance natural landscapes and tree canopies to minimize air pollution impacts and heat exposure. Promote the use of drought tolerant and native species in landscaped areas.
- ▶ Add denser tree canopy near high-volume roadways and industrial areas, specifically a double-row of long-needle conifers allowing no line-of-sight.
- ▶ Incorporate standards for more frequent street sweeping to reduce roadway dust associated with increased VMT on high-traveled roadways within 1,000 feet of residential uses.
- ▶ Consider zoning standards that identify location, building, and site design provisions that support reduced exposure to potential air toxics such as screening through architectural features, buffer land uses, etc.

The City could adopt new development standards that require or incentivize enhanced air filtering and circulation to address transportation-generated (on-road and aircraft) particulates for residences and other sensitive uses (e.g., schools, daycare, hospitals, etc.).

1.6.2.5 With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to air quality and GHG emissions are anticipated. Through mitigation implementation, local and state climate actions, and expected continued regulatory changes, the alternatives may result in lower GHG emissions on a per capita basis compared to existing conditions. The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each alternative would generate GHG emissions from growth and development within the city, the benefit of channeling development to targeted

areas that might otherwise occur in peripheral areas of the city or region could serve to offset these impacts.

1.6.3 Land Use Patterns

1.6.3.1 How did we analyze Land Use Patterns?

This section reviews the potential change in activity levels in areas of change. It is based on land use information from assessor data, aerials, future land use and zoning maps, and field reviews of conditions.

Thresholds of significance utilized in this land use and socioeconomic impact analysis include:

- ▶ Change to land use patterns or development intensities that preclude reasonable transitions between areas of less intensive zoning and more intensive zoning.
- ▶ Differences in activity levels at boundaries of uses likely to result in incompatibilities.
- ▶ Impacts to designated shorelines.

In addition, each alternative is evaluated using equity and climate resilience performance measures:

- ▶ Land use patterns that promote healthy, active lifestyles with affordable and convenient places to live, work and play.
- ▶ Reduced hazard exposure for those socially vulnerable.

1.6.3.2 What impacts did we identify?

Under all alternatives no changes to the shoreline environment designations would be made. The City would address the shorelines under the next SMP periodic update.

1.6.3.3 What is different between the alternatives?

Land Use Patterns: Alternative 1 continues a land use pattern focused on Residential Low densities. Alternative 2 and the Preferred Alternative plans for more Commercial Mixed Use and varied Residential Low 1 and 2 densities, as well as Residential Medium uses. Alternative 3 has the most varied housing and a mix of Commercial, Downtown, and Industrial lands. Alternative 3 and the Preferred Alternative would have the greatest development intensities particularly in Downtown Urban Center and Industrial areas. These areas of greater intensity could have a potential for incompatibilities at transition areas unless urban design, landscaping, and amenities are provided.

Activity Levels: Higher activity levels by population and jobs can create more economic activity in the community and support goals for prosperity. Activity levels created by population and jobs including demand for services and infrastructure would likely vary under the alternative. Alternative 3 and the Preferred Alternative would have the greatest activity levels for housing and jobs, Alternative 2 would meet housing targets but have less activity levels associated with jobs.

Alternative 1 does not meet growth targets and would have the lowest activity levels. Alternative 2 would distribute more activity at nodes throughout Burien with small retail opportunities, whereas Alternative 3 would concentrate activity in the Downtown and First Avenue South Corridor as well as in Ambaum Boulevard Corridor and Boulevard Park. The Preferred Alternative would blend the concepts of nodes, corridors, and a Greater Downtown. Growth at target levels is planned similar to Alternative 3.

Equity and Climate Resilience: Under all alternatives the City would implement its Climate Action Plan to reduce greenhouse gas emissions and to increase public information about climate change. Action Alternatives include new and updated goals and policies in a Climate Element and promote greater resilience of the community and development. The action alternatives add strategies to address heat exposure such as trees and greenery in rights of way focused in areas of vulnerability and heat islands. Additional policies addressing adaptation, enhancement, and sea level rise are also proposed under action alternatives.

1.6.3.4 What are some solutions or mitigation for impacts?

Mitigation consists of updated Comprehensive Plan policies, and Title 19 standards such as landscaping, tree protection, recreation space, signage, Urban Center street frontage improvements for pedestrians, and others. See Socioeconomics and Aesthetics for other mitigation measures.

1.6.3.5 With mitigation, what is the ultimate outcome?

Under all alternatives, additional employment growth would occur across the city in commercial, mixed use, and industrial areas as well as in home-based businesses and service-oriented jobs in residential areas. More housing and mixed uses would occur in the Urban Center under all alternatives especially Alternative 1 whereas Alternatives 2 and 3 would also provide for growth along other corridors and nodes such as First Avenue South, Ambaum Boulevard, and Boulevard Park. The Preferred Alternative proposes housing and mixed uses in nodes, corridors and the Greater Downtown, blending concepts from the other studied alternatives. More middle housing types would occur under Alternatives 2 and 3 and the Preferred Alternative in Residential Low areas.

There would be a generalized increase in building height and bulk and development intensity over time, as well as the gradual conversion of low-intensity uses to higher-intensity development patterns. This transition would be unavoidable, but it is not significant and adverse since this is an expected characteristic of the City's designated a Core City and helps fulfill Countywide Planning Policies and VISION 2050 strategies for focusing growth in centers and where transit service exists or could be added

1.6.4 Plans & Policies

1.6.4.1 How did we analyze Plans & Policies?

This section describes pertinent plans, policies, and regulations that guide or inform the proposal. Plans and policies evaluated in this section include the Growth Management Act (GMA), Puget Sound Regional Council's (PSRC) VISION 2050, and the King County Countywide Planning Policies (CPPs). A finding of inconsistency or contradiction with plans and policies would be considered to result in a significant adverse impact.

1.6.4.2 What impacts did we identify? What is different between the alternatives?

Alternative 1 No Action would maintain the current Comprehensive Plan, and elements would not be updated to meet newer state and regional requirements under GMA, VISION 2050, or the King County Countywide Planning Policies. Alternative 1 would not be consistent with new State requirements or regional plans.

Alternative 2 would meet most state and regional requirements, particularly regarding housing targets, except for capacity to meet jobs targets. Alternative 3 and the Preferred Alternative would propose policies that are compatible with state and regional plans.

The Preferred Alternative provides for updates to the Urban Center Plan to be consistent with the proposed Future Land Use plan and zoning designations and continues to meet VISION 2050.

The action alternatives would adopt a new Comprehensive Plan with a new growth strategy. The new Housing Element also incorporates the newest requirements to address racially disparate impacts in housing and provide opportunities for housing under a range of income categories per GMA amendments and recent legislation requiring more flexible standards for middle housing and accessory dwelling units.

In addition, the action alternatives include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change.

1.6.4.3 What are some solutions or mitigation for impacts?

As required by GMA, the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption. As of the Final EIS the City had received state and regional review.

Alternative 1 could be amended with features of Alternatives 2 or 3 to further implement housing element requirements for middle housing and affordability requirements.

1.6.4.4 With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts are anticipated. Inconsistencies with new regional plans and state requirements such as and the regional growth strategy under Alternative 1 can be avoided through amendments to the Comprehensive Plan as proposed by Alternatives 2 and 3.

1.6.5 Socioeconomics

1.6.5.1 How did we analyze Socioeconomics?

The EIS addresses the ability of alternatives to meet the City's growth allocations; each alternative's effects on affordable housing conditions, economic development strategies, and job mix; and the potential for displacement. Information is developed from US Census, State Office of Financial Management, and Department of Commerce sources and methods. It also references the City's Housing Action Plan and Countywide Planning Policies.

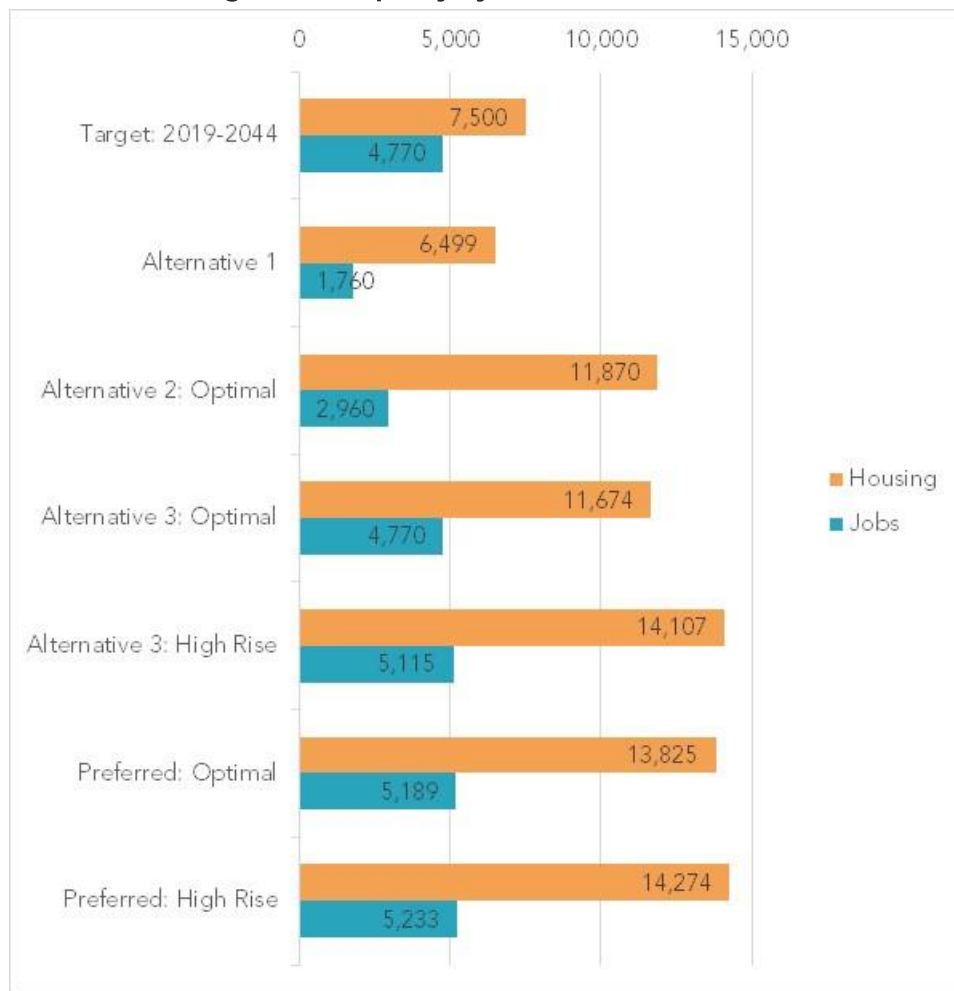
Thresholds of significance include:

- ▶ Inability to provide sufficient buildable land capacity for housing and jobs.
- ▶ Rate of potential economic displacement.
- ▶ Insufficient production of necessary affordable units.

1.6.5.2 What impacts did we identify? What is different between the alternatives?

All alternatives provide capacity for new housing. Alternatives 2 and 3 reach housing targets and Alternative 1 does not. All alternatives provide some capacity for jobs with only Alternative 3 fully meeting the target. See [Exhibit 1.6-3](#).

Exhibit 1.6-3. Targets and Capacity by Alternatives



Source: King County 2019; BERK 2023.

Single-family homes designated for more intensive uses could be redeveloped. Alternative 1 could result in the conversion of 227 dwellings with greater conversion under Alternatives 2 and 3 of 469 to 489 dwellings. The Preferred Alternative would have a potential for conversion closer to Alternative 1 at 224 units.

Older multifamily buildings in multifamily, mixed use, or industrial designations may be more likely to change to more intense commercial, residential, or mixed uses. The potential for displacement is ~~123-133~~ 144 dwellings. See [Exhibit 1.6-4](#).

Exhibit 1.6-4. Multifamily Units that Could Redevelop (1978 or Older)

Future Land Use Designation	Alt 1	Alt 2	Alt 3	<u>Preferred</u>
Commercial/Mixed Use	61	81	71	<u>92</u>
Downtown Urban Center	4	3	36	<u>14</u>
Industrial	3		3	<u>3</u>

Future Land Use Designation	Alt 1	Alt 2	Alt 3	<u>Preferred</u>
Residential Medium	55	49	24	<u>25</u>
Grand Total	123	133	134	<u>144</u>

Source: King County Assessor, BERK 2023.

Burien has about 6.6 million square feet of commercial, service, or industrial space. Under all alternatives about 1.6 million square feet of commercial space is located on redevelopable sites. Alternatives 1 and 3 have the least amount of commercial space in residential areas (Residential Medium) and Alternative 2 the most. In Residential Medium areas, existing commercial space could be redeveloped in favor of residential uses. Existing businesses could remain or be incorporated into newer developments, or be displaced. See [Exhibit 1.6-5](#).

Exhibit 1.6-5. Commercial, Industrial, and Service Spaces on Redevelopable Sites

Space Located on	Alternative 1	Alternative 2	Alternative 3	<u>Preferred</u>
Commercial/Mixed Use	614,059	1,173,924	349,764	<u>421,086</u>
Downtown Urban Center	871,680		1,157,384	<u>1,118,535</u>
Industrial	13,498	13,498	13,498	<u>13,498</u>
Residential Low 1	7,738	1,520	7,738	<u>1,520</u>
Residential Low 2	4,777	3,270		<u>6,218</u>
Residential Medium	54,080	373,620	37,448	<u>4,975</u>
Total	1,565,832	1,565,832	1,565,832	<u>1,565,832</u>

Source: King County 2019; BERK 2023.

Consistent with Countywide Planning Policies, Burien's Comprehensive Plan is to provide housing types that meet a full range of household incomes. See [Exhibit 1.6-6](#).

Exhibit 1.6-6. Growth Targets

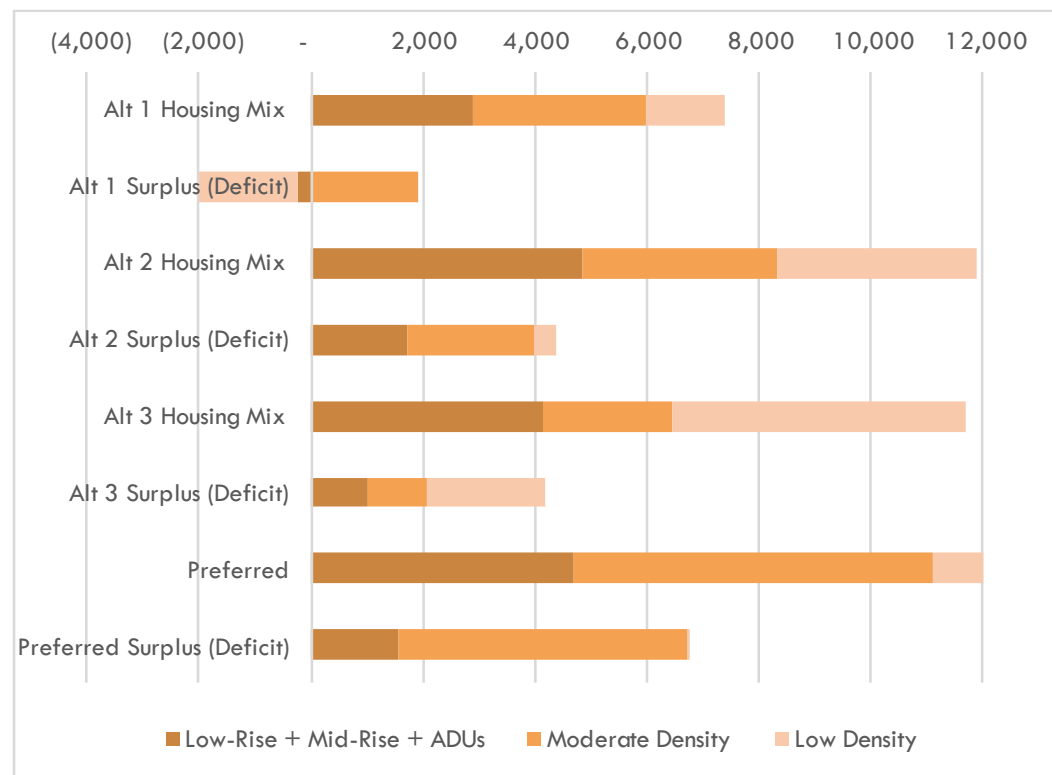
Target Type	Target Number
Housing 2019-2044	7,500
Income Level 2019-2044 Breakdown	
0-30% PSH*	759
0-30% Other	1,444
30-50%	524
50-80%	407
80-100%	574
100-120%	650
120%+	3,142
Emergency housing and shelter beds 2019-2044	1,443

*Permanent Supportive Housing

Source: King County, 2021

Alternative 1 provides housing in each income category but does not provide sufficient housing types that are affordable to low incomes or high incomes. Based on more recent trends for accessory dwelling units (ADUs) in Burien and recent legislation Alternative 1 could reverse the low income gap. Alternatives 2 and 3 and the Preferred Alternative provide sufficient housing types at all income levels. See [Exhibit 1.6-7](#).

Exhibit 1.6-7. Affordable Housing Mix and Target Achievement – Chart by Alternative



Source: BERK 2024⁴³.

To address GMA requirements to provide capacity in regulations for emergency and permanent supportive housing, the City must allow permanent supportive housing and transitional housing in all zones that allow residential development and hotels. Under all alternatives, the City would need to evaluate and update its zoning code, for existing or new zones that implement alternatives. This may mean updating current similar use definitions and providing reasonable standards per State laws and guidelines.

1.6.5.3 What are some solutions or mitigation for impacts?

- ▶ With a Preferred Alternative, the City should amend its zoning code to implement the selected land use alternative and to comply with State laws (e.g., HB 1220 and HB 1110) to allow for a range of housing types at all income levels and to address emergency and permanent supportive housing. The Preferred Alternative proposes updates to mixed use and multifamily

zones, as well as emergency and transitional housing in 2024. Consistent with state requirements, the City plans to address HB 1110 zoning in 2025.

- ▶ The Burien Zoning Code provides opportunities for housing and business establishment, and existing building expansions.
- ▶ The Burien Building and Property Maintenance Code provides for quality structures to protect tenant health and safety, consistent with the Washington State Landlord Tenant Act.
- ▶ The Burien Economic Development Department provides a range of services including business assistance, site selection assistance, business development attraction, tourism promotion, and community events. Examples of responsiveness to small business needs, the City has a Shop Local Burien website. It has also piloted a food truck program.
- ▶ The City is developing an Economic Development Action Plan. This can be folded into the Comprehensive Plan Economic Development Element strategies.
- ▶ To avoid, reduce, or minimize displacement impacts, and to create vibrant business districts and support community investments, following are other potential mitigation measures:
 - Reducing Business Space and Parking Requirements
 - Facilitating community land trust work for commercial and residential affordability
 - Setting up a public development authorities (PDAs) or other mechanism for supporting businesses
 - First right to return for residential tenants or businesses
 - Tenant relocation assistance
 - Community benefit agreements

1.6.5.4 With mitigation, what is the ultimate outcome?

Under all alternatives, additional growth would occur in the city. All alternatives could see some risk of displacement of existing residents or businesses; this risk would be higher under Alternatives 2 and 3 or the Preferred Alternative but so would the capacity for relocation in new housing units. Alternatives 2 and 3 would increase substantially the capacity for housing that could better meet demand at all affordability levels. Increasing affordable housing programs and incentives for providing units affordable to diverse income groups and to investment in affordable housing development could offset affordability pressures.

Measures to encourage and retain small businesses would also help avoid displacement and create a more vibrant urban hub. The capacity of alternatives together with mitigation measures encouraging and requiring affordable housing and a variety of employment space should avoid significant adverse impacts.

1.6.6 Noise

1.6.6.1 How did we analyze Noise?

Noise experts have evaluated the alternatives land use and growth proposals in proximity to noise sources (airport and high volume roads) and evaluated potential traffic volumes in a noise model. Thresholds of significance utilized in this impact analysis include:

- ▶ The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.⁴
- ▶ Expose new noise-sensitive receivers to noise levels in excess of the following noise standards established in Burien Comprehensive Plan Policies NP 1.3 and/or PRO 4.4:
 - 60 dBA L_{dn} for golf courses, ball fields, outdoor spectator sports areas, amusement areas, riding stables, nature trails, wildlife refuges, auditoriums
 - 55 dB L_{dn} for residential uses and park, recreation and open space areas
 - 50 dBA L_{dn} for outdoor amphitheaters and music shells
- ▶ Short-term construction activities occurring outside of the exempt hours of BMC Section 9.105.410.
- ▶ Future commercial or light industrial uses that use stationary mechanical equipment, outdoor loading docks, or outdoor material storage areas that generate noise in excess of the noise limits established in Washington State Administrative Code (WAC) Section 173-60-040.

1.6.6.2 What impacts did we identify?

Development within Downtown and other commercial/mixed-use areas could require the use of heavy construction equipment (including pile drivers) within 50 feet of other buildings that could be occupied by residents or other sensitive receptors. However, construction would be limited to the hours established in BMC Section 9.105.410 in acknowledgement that construction activities are a standard procedure in a developing city. Therefore, construction noise is identified as a less than significant impact.

New sensitive receptors (e.g., residential uses) could be located within transportation noise contours above the City's residential noise standard of 55 dBA L_{dn} due to proximity to roadway and airport noise sources. Consequently, if residences or other noise-sensitive land uses are located in close proximity to major roadways, highways, airports, or noise-generating industrial operations, additional insulation, window treatments, or noise abatement features may be warranted to reduce interior noise levels to acceptable levels. On the other hand, if active industrial development is proposed adjacent to noise-sensitive land uses, noise compatibility problems could also arise. The potential for future or current sensitive receivers to experience roadway noise or stationary noise from industrial or other noise-generating developments would be a potential moderate noise impact and mitigation measures could be considered.

⁴ The WSDOT guidance states that a predicted future traffic noise level of 10 dBA or more above existing noise levels constitutes a substantial increase.

Traffic noise levels for all alternatives would increase by less than 4.1 dBA along all roadway segments modeled roadways. Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference, and a 5-dBA change is clearly perceptible and is typically considered substantial. Consequently, an increase of less than 4.1 dBA would be considered a minor impact on environmental noise. While the traffic noise impacts would not be discernible from background noise levels, the proposed alternatives are anticipated to result in a cumulative noise increase from stationary sources (e.g., mechanical equipment, parking lot noise, conversations, etc.) due to the increased density, scale, and nature of development associated with these alternatives. Alternatives 1 and 3 would result in traffic noise increases ranging from 0.2 dBA L_{dn} to 4.1 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. Alternative 2 has growth in the range of Alternatives 1 and 3 and is anticipated to have similar impacts. The Preferred Alternative has growth similar to Alternative 3 and transportation evaluations show similar results; thus, noise effects are anticipated to be the same.

Noise increases from the alternatives could worsen noise levels in some areas that experience high noise levels under existing conditions that are considered healthy for residential and other sensitive uses. However, noise levels from stationary sources would be required to comply with the exterior sound level limits outlined in WAC Section 173-60-040; see [Exhibit 1.6-8](#). Maximum Permissible Noise Level. Following compliance with the WAC noise standards, stationary noise source impacts from all alternatives would not be significant.

Exhibit 1.6-8. Maximum Permissible Noise Level

Source of Noise	EDNA Receiver of Noise (Maximum Allowable Sound Level in dBA Leq)		
	Residential	Commercial	Industrial
Class A Residential	55	57	60
Class B Commercial	57	60	65
Class C Industrial	60	65	70

Source: WAC Chapter 173-60, 2023.

1.6.6.3 What is different between the alternatives?

Alternative 3 and the Preferred Alternative would result in expanded light industrial development within the Northeast Redevelopment Area. Allowed industrial uses would include warehouses, workshops, manufacturing facilities, processing and distribution, business park and flex-tech, small office or flexible buildings, and auto sales. Noise sources from industrial uses can include truck movements and deliveries, loading/unloading activities, and the use of mechanical equipment or machinery (e.g., mechanical lifts, power tools, forklifts, yard trucks, exhaust fans etc.). Noise generated by these sources varies widely and is often intermittent but can generate high noise levels when close to the source for some activities. New industrial development from Alternative 3 or the Preferred Alternative could be located near existing residential uses along S 128th Street, 10th Street, and 12th Avenue S. Similar to the impact discussion above for all alternatives, land use

compatibility and/or noise pollution issues could arise due to the proximity of new industrial development to residential uses. However, industrial operations would be required to comply with the WAC's maximum permissible noise levels (see [Exhibit 1.6-8](#). Maximum Permissible Noise Level) and the provisions of BMC Section 19.15.070.1.A.ii.f prohibiting excessive noise at neighboring properties for land uses located within the City's Airport Industrial Area. Nonetheless, the potential for noise pollution and/or land use compatibility conflicts from expanded industrial development in Alternative 3 or the Preferred Alternative is considered a potential moderate adverse impact. Implementation of mitigation measures would reduce noise impacts from industrial uses to a less than significant level.

1.6.6.4 What are some solutions or mitigation for impacts?

The City of Burien and WAC noise regulations establish exterior sound level limits for various land uses varying depending on the noise source and receiving land use (see Burien Comprehensive Plan Policies NP 1.3 and PRO 4.4, and the WAC noise standards in [Exhibit 1.6-8](#). Maximum Permissible Noise Level). These limits are intended to result in acceptably low interior noise levels for residences and other sensitive noise receptors. City noise regulations also address construction noise, limiting the times during the day when construction noise can occur. New development within the City's designated airport noise reduction areas would also be required to comply with the minimum noise insulation requirements as established in BMC Section 15.12.080.

Although mitigation measures are not required due to a lack of significant adverse impact findings, to reduce the potential for exposure of residences and other noise-sensitive land uses to noise pollution, and to further implement new regional policies in VISION 2050 and Countywide Planning Policies,⁵ the Burien 2044 Comprehensive Plan Update could consider adoption of a policy that recommends residences and other noise-sensitive land uses (i.e., schools, day care) be separated from highways, high-traveled roadways, and commercial/industrial facilities where exterior noise environments exceed the City's 55 dBA L_{dn} noise standard. If sensitive land uses are proposed in such areas, a policy addressing the need for additional mitigation strategies could be considered to achieve an interior noise performance standard of 45 dBA L_{dn} . The types of implementation measures that could help to accomplish this include:

- ▶ Coordination with WSDOT on sound wall construction where major highways pass through residential areas.
- ▶ Establish noise and land use compatibility guidelines for each land use type in the City.⁶ This could include a range of noise levels for Clearly Acceptable, Normally Acceptable, Conditionally Acceptable, Normally Unacceptable, and Clearly Unacceptable standards by land use.
- ▶ Require noise studies/mitigation for all development where the projected exterior noise levels exceed the City's allowable noise standards, to the extent feasible.

⁵ Countywide Planning Policies include: EN-25 Prevent, mitigate, and remediate harmful environmental pollutants and hazards, including light, air, noise, soil, and structural hazards, where they have contributed to racialized health or environmental disparities, and increase environmental resiliency in frontline communities.

⁶ See example: Noise/Land Use Compatibility guidelines, see PDF page 9: https://opr.ca.gov/docs/OPR_Appendix_D_final.pdf.

- ▶ Adopt policies or municipal code provisions to ensure interior noise levels for all buildings/land use types are within acceptable standards.
- ▶ Adopt goals or policies with site planning/design techniques to help guide land use planning decisions and encourage proper design for future developments. Such techniques may include, but are not limited to, the following:
 - Increase the distance from the road to the extent feasible.
 - Place noise compatible land uses such as landscaping areas, maintenance facilities, and utility areas between the road and the residences or noise-sensitive uses.
- ▶ Use buildings or berms as noise shields by locating them parallel to the road. (Note, this is an effective strategy for ~~roads, but roads~~ but is ineffective from aircraft noise.) Soundproof the building if it contains residences.
 - Locate residences in topographically low points that are naturally low noise pockets if they exist.
 - Orient the residences—and spaces within the building that benefit from quieter volumes (bedrooms and living rooms)—away from the noise.
 - Use cluster and planned unit development techniques to accomplish combinations of the above. However, these techniques have limited to no effect on noise originating from aircraft overhead.

1.6.6.5 With mitigation, what is the ultimate outcome?

Under all studied alternatives, increased residential and employment growth could result in increased traffic volumes, though the resulting noise increases are not anticipated to exceed 5 dBA, the threshold of change that is clearly perceptible, nor the substantial increase standard of 10 dBA established by WSDOT. The location of noise sensitive receivers (e.g., residential uses) near traffic, airports, or commercial/industrial noise sources could occur under all alternatives, particularly Alternatives 2 and 3 and the Preferred Alternative. Implementation of residential noise mitigation described in the previous subsection should adequately reduce noise experienced by noise-sensitive receivers. With the application of mitigation measures described above, no significant unavoidable adverse noise impacts would occur under any of the alternatives.

1.6.7 Aesthetics

1.6.7.1 How did we analyze Aesthetics?

The aesthetics evaluation uses mapped comparisons of proposed height limits to identify locations where new transitions in scale may occur between zones, as well as places where shadows may impact public spaces. For social wellbeing, the analysis considers changes to the built environment that may inhibit or enhance people's ability to use active transportation, build trust amongst neighbors, interact spontaneously, and gather in culturally relevant spaces. Where differences are noted, the study qualitatively analyzes potential impacts.

Thresholds of significance include:

- ▶ Transitions in scale. Height of development, location of roads, and landscaping abutting surrounding neighborhoods creating an appropriate transition to areas of greater or lower density.
- ▶ Shadows on public space. The potential for future development to cause shadows on public open spaces that could hinder public use and enjoyment of the space.
- ▶ Social wellbeing. Inconsistency of development with commercial and residential design goals for vibrancy, livability, and social wellbeing, especially related to spaces that support community and relationship building.

1.6.7.2 What impacts did we identify?

Transitions in scale

In all alternatives, there are some places where zones of differing intensities abut each other without a street or natural area to provide a buffer between them. However, in most cases, new and expanded Residential Medium and/or Residential Low 2 areas provide a stepping down in intensity between Downtown Urban Center and Commercial/Mixed Use areas to Residential Low or Residential Low 1 areas. In addition, the Residential Low designations include middle housing allowances, which can more evenly spread the distribution of scale transition impacts. In Alternative 3 or the Preferred Alternative, development in the expanded NERA area may have broader and potentially taller buildings than the existing and nearby low density residential buildings.

Shadows on public spaces

In most cases, proposed height limits adjacent to public parks remain the same across the alternatives and/or increases in height would not be noticeable due to tall evergreen trees already shading the park. However, some shadow impacts to parks are expected, notably to Puget Sound Park and minor to modest impacts to several others, including Town Square Park downtown. In addition, increased heights around future pedestrian-oriented streets may increase shadows on public sidewalks, especially SW 152nd St downtown, though most of these streets would be shadowed by shorter development allowed under Alternative 1 No Action, as well.

Social wellbeing

Positive and negative impacts to social wellbeing from potential changes to the built environment include the following:

- ▶ **Active living and general human experience.** Redevelopment would likely improve the mix of uses and building to street relationships in both study areas, making the street level experience more welcoming and comfortable to people on foot, wheel, or bicycle.
- ▶ **Commercial and cultural space design.** With redevelopment under any alternative, without ground floor commercial requirements or incentives, it is possible new commercial space, especially downtown and along Ambaum Blvd, would not be included or designed to support the same types of culturally relevant uses and businesses.

- **Residential design for social interaction.** If redevelopment occurs without development and design standards to encourage quality design, building and site design may miss an opportunity to improve 1) the range of home types available to support people staying in the community over their lifetime and 2) social interactions, e.g., home to sidewalk transitions for chance interactions and comfortable public space, shared open space amongst neighbors, and shared internal spaces in multifamily buildings.

1.6.7.3 What is different between the alternatives?

Transitions in scale

In general, taller buildings are expected in larger areas in the action alternatives than in Alternative 1 No Action. In the action alternatives, there are some new places where zones of differing intensities abut each other. The arrangement of zones generally stepping scales from greater to lesser intensity happens over a larger area in Alternative 2 than Alternative 3, distributing scale transition impacts throughout the city. The Preferred Alternative likewise provides for nodes and corridors to be more intense similar to Alternative 2. Alternative 3 and the Preferred Alternative expands Downtown Urban Center zoning, creating a more intense transition around the Urban Center boundary and around 1st Ave north of downtown. Alternative 3 and the Preferred Alternative also expands the NERA area northward, allowing light industrial building types in a predominately low density residential area.

Shadows on public space

Differences in potential shadow impacts across alternatives include:

1. Puget Sound Park along 1st Ave would have modest shadow impacts from Alternative 1 development, more impacts from Alternative 2, and the most impacts from Alternative 3
2. Town Square Park and SW 152nd St downtown could have modest shadow impacts from Alternative 1 and 2, and potentially great impacts from Alternative 3
3. Parks in the Ambaum and Boulevard Park areas would see modest shadow impacts in the Action Alternatives as described in the Ambaum and Boulevard DEIS.

Social wellbeing

Alternative 1 has modest benefits for social wellbeing—development under current zoning and development standards would likely improve the human experience. Alternative 2 spreads active living benefits to more places in the city, while Alternative 3 focuses these benefits downtown. The Preferred Alternative blends active living concepts with a greater downtown, like both Alternatives 2 and 3.

1.6.7.4 What are some solutions or mitigation for impacts?

Transitions in scale

Existing development standards address transitions between zones but may limit desirable redevelopment. Proposed future transition standards would mitigate transitions in scale with height and upper story step back requirements while balancing development feasibility and goals for better connected mutually beneficial adjacent uses. Light industrial development and design standards tailored to residential areas in transition could mitigate aesthetic impacts both within the expanded NERA area and at its borders.

Shadows on public spaces

Burien may identify especially important future public spaces, such as plazas along pedestrian-oriented streets, and consider requiring afternoon solar access.

Social wellbeing

The incorporated plan features include policies and zoning and development code concepts to support livability, vibrancy, community health, and social wellbeing, such as business anti-displacement measures and middle housing design standards.

1.6.7.5 With mitigation, what is the ultimate outcome?

There are no significant unavoidable adverse impacts to transitions in scale, shadows on public space, or social wellbeing. Over time, Burien would be more likely to redevelop with positive design characteristics for vibrant, sociable neighborhoods that support active living under Alternative 2 or 3 or the Preferred Alternative.

1.6.8 Transportation

1.6.8.1 How did we analyze Transportation?

Existing transportation conditions in the City of Burien are documented based on site reconnaissance and spatial information regarding the location of roads, sidewalks, bike lanes, and transit facilities. Future transportation conditions under two alternatives are quantitatively evaluated with the Puget Sound Regional Council (PSRC) travel demand model updated to reflect 2044 conditions.

Two land use scenarios are analyzed in the DEIS: Alternative 1 No Action, which assumes the City's current land use policies and growth trends for the future, and Alternative 3, which meets the total housing growth and affordable housing targets as well as the job targets for 2044. Alternative 2 focuses on mixed uses and multifamily in neighborhood centers, spreading housing growth around

the city. As Alternative 3 provides a bookend of the highest growth (and therefore most intense travel activity) scenario, Alternative 2 was not quantitatively analyzed. The transportation system performance of Alternative 2 is expected to fall between the performance of the No Action Alternative and Alternative 3.

Similar to Alternative 2, the Preferred Alternative is expected to fall between the performance of the No Action Alternative and Alternative 3. The travel demand model was run with the Preferred Alternative land use to review volumes at locations where LOS results were different between Alternative 1 No Action and Alternative 3. Then, a review of anticipated growth and volumes was conducted to identify the alternative more closely matching the conditions anticipated under the Preferred Alternative. This approach was used to identify the expected intersection level of service with the Preferred Alternative and any associated impacts. The Final Environmental Impact Statement (FEIS) will evaluate the City's preferred alternative and may include additional travel demand modeling.

The pedestrian and bicycle networks are proposed to be the same under each land use scenario, including the Preferred Alternative.

1.6.8.2 What impacts did we identify?

Traffic Operations: Impacts on traffic operations are identified in both Alternative 1 No Action, and Alternative 3, and are also expected to occur under Alternative 2 the Preferred Alternative. Six intersections are expected to perform below the City's standards in future alternatives, including:

- ▶ 8th Avenue S and S 112th Street
- ▶ 6th Avenue SW and SW 148th Street
- ▶ 1st Avenue S and SW 148th Street
- ▶ Des Moines Memorial Drive S and SR 518 off Ramp
- ▶ 1st Avenue S and SW 128th Street
- ▶ 24th Avenue S and S 116th Street

All six intersections are identified with as having significant impacts under Alternative 1, but Per the thresholds of significance defined for action alternatives which evaluate performance relative to the No Action condition, only the four intersections in bold are identified with significant impacts under Alternative 3 would be significantly impacted with the Preferred Alternative. Mitigations are identified for each impact.

Impacts are not identified in mode share, Vehicle Miles Traveled (VMT) per capita, state facilities, and transit ridership on major routes and corridors.

Parking: For each alternative, it is anticipated that developers would maintain or build adequate supply for their new needs and comply with city parking requirements. Despite the new supply of off-street parking spaces in all alternatives, it is likely that demand for on-street parking would also increase because many visitors prefer the convenience of an on-street space. However, given the

existing availability of on-street spaces within the city, the increase in demand for on-street parking is not expected to be substantial enough to cause a significant adverse impact to on-street parking.

Safety: Traffic volumes in Burien are projected to increase by 2044. With higher volumes, there is potential for an increased number of collisions. However, there is no indication that collision rates at intersections or along segments would increase significantly. The City would continue its current monitoring programs to identify locations that would benefit from safety improvements and implement measures that address those concerns as they arise. Therefore, no significant safety impacts are identified for the alternatives.

1.6.8.3 What is different between the alternatives?

Traffic Growth: After applying the land use growth expected for Alternative 1, the PSRC model generated estimated future traffic volumes along major roadways throughout Burien. The PSRC model estimated that overall traffic volumes in the city would increase by approximately 25% in Alternative 1 compared to existing conditions. Under Alternative 3, the PSRC model estimated that the overall traffic volume would increase by approximately 27%. Under Alternative 1, impacts were identified at six intersections. Under Alternative 3, impacts were identified at four of the six intersections as the four would experience increased delay of at least 5 seconds more than in Alternative 1. Total traffic volumes for the Preferred Alternative are anticipated to be between Alternative 1 and Alternative 3. Intersection level of service impacts for the Preferred Alternative are consistent with Alternative 3.

Transit Operations: All alternatives would create demand for transit. Under ~~both all~~ action alternatives, the additional multifamily residential capacity would provide further opportunities for transit-oriented development and transit ridership. ~~Under Similar to Alternative 3, Alternative 3 the Preferred Alternative, included~~ increased density in the Urban Center and beyond along 1st Avenue South, ~~which~~ would leverage capacity at Burien Transit Center. As transit trips increase, King County Metro (KCM) could consider potential service changes through its Biennial Budget and Capital Improvement Program (CIP), 10-Year Business Plan, and long-range Metro Connects plan.

1.6.8.4 What are some solutions or mitigation for impacts?

This EIS identified four mitigation strategies. The four mitigation solutions include:

- ▶ Installing new signals at the following intersections: 8th Avenue S and S 112th Street, ~~and, Des Moines Memorial Drive S and SR 518 off Ramp, and 8th Avenue S and S 112th Street.~~
- ▶ The Alternative 1 impact at the 6th Avenue SW and SW 148th Street intersection could also be mitigated by installing a new signal. – Note that the Preferred Alternative would not trigger a new impact relative to the Alternative 1 condition, but this strategy would be needed to meet the City's intersection LOS standard with any future year alternative.
- ▶ Modifying intersection signal timing plans at 1st Avenue S and SW 148th Street – Note that the Preferred Alternative would not trigger a new impact relative to the Alternative 1 condition, but this strategy would be needed to meet the City's intersection LOS standard with any future year alternative.

- ▶ Adding a right turn pocket- at 1st Ave S and SW 128th Street.
- ▶ Installing a roundabout at the intersection of 24th Avenue S and S 116th Street.

In addition to these improvements, the City has regulations meant to manage system capacity. The City manages a Commute Trip Reduction (CTR) program which applies to employers with 100 or more full-time employees at a single worksite.

In addition to the CTR program, the City could also consider other programmatic measures, such as Transportation System Management and Operations (TSMO), which can improve safety and provide flexibility to address changing conditions, and additional Transportation Demand Management (TDM) strategies, which can help reduce congestion by reducing demand for automobile travel and encouraging travel by other modes. Additional investment in pedestrian and bicycle infrastructure can also help shift mode choice to active modes as people explore better connectivity and access to nearby destinations.

The City could also develop and adopt a multimodal level of service and concurrency program consistent with state and regional laws and plans in the Transportation Master Plan (TMP).

1.6.8.5 With mitigation, what is the ultimate outcome?

Significant unavoidable adverse impacts were not identified under any of the studied alternatives. The mitigation strategies should address traffic operations at intersections generating impacts and satisfy the City's Level of Service (LOS) standards.

1.6.9 Public Services

1.6.9.1 How did we analyze Public Services?

This section addresses the potential impacts on public services associated with each alternative including police, fire/emergency medical, schools, and parks and recreation. It relies on system plans, published data, level of service policies, and annual reports from the agencies that provide the services. External agencies provide police, fire, and education services in the City of Burien. The King County Sheriff's Office (KCSO) provide police services, King County Fire District #2 provides fire services for the City of Burien and parts of unincorporated King County near Burien city limits, and Highline School District is the provider of public education in Burien. Parks services are provided citywide by the City of Burien Parks, Recreation and Cultural Services (PaRCS) department. Other recreation facilities that are available to the community include public schools (when not in session and according to school rules) and public street ends.

Impacts of the alternatives are considered significant if they:

- ▶ Increase demand for police or fire and emergency services that cannot be accommodated through regular planning and staffing processes.

- ▶ Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.
- ▶ Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.

1.6.9.2 What impacts did we identify?

Under all studied alternatives, increased housing and employment in Burien over the 2019-2044 period would increase demand for public services including police and fire emergency services, schools, and parks. Alternative 1 would have less growth and less demand and Alternative 3 would have the greater demand matching growth targets. Alternative 2 would have demand in the range of the two alternatives with similar housing as Alternative 3 but lesser jobs.

1.6.9.3 What is different between the alternatives?

Growth in housing and jobs is expected to occur incrementally under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase the potential demand for police services. Based on population growth assumed under Alternative 1, BPD would add 14 officers FTEs to their current staff over the next 20 years to maintain current staffing levels of service (0.88 officers per 1,000 population). Under Alternatives 2 and 3 and the Preferred Alternative housing and population would grow like the planned growth targets in Countywide Planning Policies adding essentially 1,000 more dwellings than Alternative 1 and resulting in a need for 18 officers.

An increase in number of households and population may result in an increase in the number of calls for fire and/or emergency medical services (EMS) service under all alternatives. To maintain the current level of service of 1,911 housing units per staff and 5,255 housing units per fire station apparatus the department would need to add 3.4 FTE positions per shift and 1.2 apparatus (rounded to 2) under Alternative 1. This demand would increase under Alternatives 2 and 3 and the Preferred Alternative a need for 4 FTE positions per shift and 1.4 apparatus (rounded to 2).

Growth in housing and student enrollment is expected to occur incrementally under all alternatives. Student generation rates were calculated in the 2018 Capital Facility Plan based on existing residential developments. Using those rates, it is anticipated the growth alternatives would potentially generate 1,410-1,640 students.

To meet alternative growth levels and maintain the current parks LOS of 3.0 acres per thousand active recreation areas, the City would need to add 15.3 acres under action alternatives or 7.7 under the No Action Alternative. The Preferred Alternative incorporates an updated PROS Plan and LOS: Maintain current developed total park acreage of 5.61 acres per 1,000 population. The 2024 PROS Plan assumes nearly 8,000 new people by 2030 and a need for 47 acres. By 2044, about 107 acres would be needed for nearly 19,000 people. All Action Alternatives assume the same growth target and would have the same new demand for parks as the Preferred Alternative.

Urban Center

The growth of the alternatives is spread in different ways to the Urban Center as documented in the Land Use Patterns section, and thus differ in impacts to services in the Urban Center.

Of the studied alternatives, Alternative 1 would experience the greatest residential growth in the Downtown Urban Center, about half of the citywide growth target. The emphasis of demand for public services could be focused there. Police and fire stations are located downtown and access to services would not be significant; the demand for staffing and operations could increase by each alternative as described above. There could be greater use of the Urban Center parks and recreation facilities and need for more maintenance over time. Schools serving the Urban Center could see more demand than other schools.

Under Alternative 2, the capacity for growth is moderate in the Downtown Urban Center; more growth is distributed to other neighborhoods with Residential Medium or Residential Low designations. Thus, impacts to facilities in the Urban Center could be less than for Alternative 1 and greater elsewhere in the city.

Within the Urban Center and along First Avenue South, more opportunities for high-rise development are provided under Alternative 3 including mixed use and hotel or other commercial uses. With high-rise development assumptions, the capacity for housing in the Urban Center would be greater than Alternative 2 and approaching Alternative 1. Thus, under Alternative 3 there could be a greater demand for police protection, schools, and parks serving the Urban Center compared with Alternative 2 and similar to Alternative 1. There could also be a greater need for apparatus capable of serving high-rise construction under Alternative 3 compared to other alternatives.

The Preferred Alternative is similar to Alternative 3 in intensity and uses as Alternative 3.

1.6.9.4 What are some solutions or mitigation for impacts?

Mitigation measures include application of the City level of service standards, adequate facilities code, onsite recreation standards, and building and fire codes.

Additionally, under Alternatives 2 and 3 and the Preferred Alternative, the City would update the Capital Facilities Plan and PROS Plan guiding investments and maintaining levels of service.

Additional mitigation measures could include:

- ▶ The City could consider addressing police, schools, and parks and recreation in Chapter 19.70 Adequacy of Public Facilities and Services.
- ▶ The City could consider adopting impact fees for parks, schools, or fire protection under RCW 82.02.

1.6.9.5 With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to public services are anticipated under any of the three potential growth alternatives. With regular coordination and capital facility plan updates, and application of codes for adequate facilities and other standards, impacts can be addressed.

1.6.10 Stormwater

1.6.10.1 How did we analyze Stormwater?

EIS authors included consulting engineers who reviewed the City’s stormwater plans and rules and considered the proposed alternatives and likely effects on stormwater. In addition to characterizing the city’s watersheds, the constructed stormwater system is described. The effect of growth on the system by alternatives is evaluated. Thresholds of significance utilized in this impact analysis include:

- ▶ Reduction in water quality or increase in surface runoff.
- ▶ Needed area for stormwater improvements
- ▶ Changes in existing deficits
- ▶ Number of acres of pollution generating impervious surface.

An impact is defined if the alternative would increase or decrease these metrics compared to the existing conditions. Where impacts are anticipated, mitigation measures are proposed.

1.6.10.2 What impacts did we identify?

~~All three alternatives~~ The Preferred Alternative would generally increase the pollutant load in stormwater since increased density and redevelopment would increase traffic; this action alternatives plan for plans for growth at target levels, which are greater than the No Action Alternative 1. VMT per capita would be reduced, however. See Exhibit 1.6-9. The transportation analysis has identified a similar set of results as Alternative 3.

Exhibit 1.6-9. Vehicle Miles Travelled by Alternative – Potential for Stormwater Pollutant Loading

Metric	2022 Existing	2044 Alternative 1	2044 Alternative 3
Total Vehicle Miles Traveled (VMT)	824,000	821,000	862,000
VMT per Capita	14.0	11.3	11.3

Source: Fehr & Peers 2023

New development and redevelopment would happen under all ~~three alternatives~~, including the Preferred Alternative. There is low potential for new development on currently

undeveloped/unimpacted land since the majority of Burien has previously been developed or undeveloped lands are protected through a variety of means, such as parks or shoreline setbacks.

Also, redevelopment, while it would generally require tree planting, often removes more mature existing trees, so at least immediately and possibly for many years after development, tree canopy is smaller which can cause higher peak flows to the stormwater system and receiving water bodies.

Under current zoning, impervious surfaces could be increased to moderate or high levels. Similar impervious surface standards are anticipated under action alternatives. Alternatives 2 and 3 and the Preferred Alternative would increase mixed use and industrial development (high intensity) compared to Alternative 1. See [Exhibit 1.6-10](#) and [Exhibit 1.6-11](#).

The Preferred Alternative allows for increased density (Residential Medium) along SW 129th Street, which flows into the known flooding area called the Hermes Depression. The Hermes Depression lies along the north side of S 130th Street between 8th Ave SW and 4th Ave SW. Stormwater from the Hermes Depression is pumped to an open channel/piped stormwater conveyance system that discharges to Miller Creek (Miller-Walker Basin Stormwater Retrofit Project). It also serves as an aquifer recharge area, which may be sensitive to stormwater contaminants. Stormwater regulations would require redevelopment to mitigate impacts to storm water runoff and downstream resources, and therefore no adverse impacts to the Hermes subbasin are likely. It is likely that localized flooding in the area as well as water quality would improve with required stormwater mitigation.

Exhibit 1.6-10. Vacant Land (Acres) and Intensity of Land Use by Alternative

Land Use Intensity	Alt 1	Alt 2	Alt 3	<u>Preferred</u>
High (Commercial Mixed Use, Downtown, Industrial)	82	120	128	<u>116</u>
Moderate (Residential Low and Medium)	199	161	154	<u>124</u>
Low (Parks, Schools)	8	7	7	<u>7</u>

Source: BERK 2023.

Exhibit 1.6-11. Redevelopable Land (Acres) and Intensity of Land Use by Alternative

Redevelopable Land	Alt 1	Alt 2	Alt 3	<u>Preferred</u>
High (Commercial Mixed Use, Downtown, Industrial)	205	305	328	<u>357</u>
Moderate (Residential Low and Medium)	588	488	465	<u>312</u>
Low (Parks, Schools)	1	1	1	<u>1</u>

Source: BERK 2023.

1.6.10.3 What are some solutions or mitigation for impacts?

In addition, to the City's stormwater regulations and 2020 plan, the City can implement the following strategies:

- ▶ The Public Works Department could assess a larger area that incorporates the increased density areas for planned regional facilities. This could lead to a larger area receiving stormwater improvements sooner than would otherwise occur.
- ▶ Increased stormwater mitigation measures could be used as a requirement for allowing higher development, thus increasing stormwater mitigation.
- ▶ The City could build understanding of forthcoming updated minimum requirements and decide on mechanisms and timing for adopting a forthcoming updated King County Surface Water Design Manual, in anticipation of required adoption of Department of Ecology's 2024 Stormwater Management Manual for Western Washington. Because stormwater management required by these updates is more comprehensive than existing regulations, building understanding within the City's permitting staff as well as with developers on the upcoming regulatory changes would help to smooth the transition, allowing growth to continue while providing enhanced protection of the City's stormwater.
- ▶ Mitigation measures for the Downtown Urban Center are included in the 2023 Draft Stormwater Plan. These include:
 - Short-term: Stormwater retrofit projects including Dottie Harper Park Water Quality and Flow Control Retrofit, Water Quality Retrofits for Alleys between SW 152nd Street and SW 153rd Street and Ambaum Regional Pond Water Quality Retrofit.
 - Long-term: includes additional retrofit projects along streets in the downtown area, stormwater tree planters along sidewalks, permeable pavements for transportation and park projects, and below ground facilities in parking lots and alleys and sidewalks.
- ▶ Mitigation measures from Proposed Final Ambaum Boulevard Park Community Plan and Final EIS include:
 - The City could consider trenchless technologies, such as Cured in Place Pipe (CIPP), slip line, and slip line spot repair to more cost effectively extend the life of existing, deteriorating storm pipe infrastructure.
 - Include flooding issues in the notice on title for affected properties. This would alert potential property owners of the flooding issues as a fair warning that they should have a hydrologist and/or civil engineer involved in any redevelopment decision-making.
 - Additionally, the City should consider promoting Low Impact Development above and beyond current requirements to address upstream properties and impacts on the properties flooding downstream from redevelopment in Boulevard Park. Examine incorporation of tree plantings as a developer requirement or an incentivized item, not only due to their community benefits, but as a supplemental water quality measure above and beyond required water quality mitigation.

- The City should consider updating their design standards, developer requirements, and municipal code to maximize landscape width to support larger tree growth and space for other stormwater BMPs.
- Requirements for “smart” irrigation systems and native planting pallets.
- A system-wide hydrologic analysis of the existing storm drain system could help pinpoint areas in the system that are currently over capacity or that would become capacity-constrained based on each alternative. This analysis could help the City prioritize which stormwater infrastructure improvements should occur first.
- There may be opportunities to complete reconstruction or retrofit of existing stormwater facilities to provide improved flow control and water quality for both existing uses and future development or redevelopment. There are significant opportunities for improved flow control and water quality treatment. Providing flow control when it is not required per the current standards would improve downstream flooding and erosion. Providing enhanced water quality treatment when it is not required would provide improvements to salmonid habitats.
- The City could consider the idea of having a developer pay a fee into a Stormwater Improvements Plan. For example, when a developer or homeowner wishes to add additional floors to an existing dwelling.
- Implement an incentive program for developers to provide zero-net impervious area change with additional incentives for implementation of LID above and beyond minimum requirements, particularly for developments within the sensitive Miller-Walker Creek basin.

From the Proposed Final Ambaum Boulevard Park Community Plan: To address the existing flooding issues at 142nd Street depression, it is recommended that the City prioritizes Study 1 and 2 from the City of Burien 2020 Storm Drainage Master Plan Update. These studies are summarized here:

- ▶ A geotechnical investigation to confirm infiltration capacity of two detention ponds on 142nd Street that currently overflows and floods public right of way and adjacent private property during large storm events. Some potential solutions include a pumped outlet, high flow bypass, or a retrofit of the existing detention ponds.
- ▶ A study to prioritize feasible locations for providing water quality treatment and creating green spaces with dispersed bioretention facilities in the Chelsea Park Neighborhood.

It is recommended that the City adopt the recommendations from the Miller/Walker Creek Basin Study to further address existing issues. In summary this includes:

- ▶ Improve habitat protection and improvements by implementing conservation easements.
- ▶ An ongoing basin monitoring program should be initiated that would allow for trend analysis of flow, water quality and habitat data.
- ▶ The City should provide additional detention facilities to reduce high flows and reduce erosion. Three detention projects could be pursued to achieve this needed detention.

- ▶ Water quality retrofits for existing development (e.g., coating of guardrails, neighborhood treatment facilities) should be evaluated by the City.
- ▶ Restoration efforts should focus on changes in stream structure. Specifically on re-establishment of finer-grained gravels in the stream bed. Restoration could be provided through the addition of large woody debris and improvements to riparian areas, including invasive plant removal.

The Ambaum Corridor and Boulevard Park Community Plan is currently under development. Suggested plan features to be incorporated as mitigation measures for stormwater include:

- ▶ There may be opportunities within older neighborhoods in the study areas that currently have no flow control or water quality treatment systems to implement retrofit systems to detain and/or treat runoff before it is released into creeks, especially within the Miller/Walker Creek basin. These systems could be located within planter areas or unimproved roadside shoulders and ditches, and could include shallow bioretention cells, infiltration trenches, or proprietary treatment BMPs for water pollution, such as Filterrras or Modular Wetlands.
- ▶ The City could consider applying for retrofit project grants offered by the Washington State Department of Ecology to partially fund these upgrades.
- ▶ The City should adopt into the municipal code a preference for stormwater BMPs that utilize trees (such as Silva Cells) before other water quality BMPs. This can be integrated into permit review.
- ▶ The City could evaluate options and feasibility for a regional stormwater facility for areas lacking in existing stormwater infrastructure, including consideration of regional facilities proposed in the recommendations in the Boulevard Park Flood Reduction study.
- ▶ The City should require that parcels that have historically experienced flooding or are within the 25-year flood areas from the Boulevard Park Flooding Reduction Project study by Otak conduct a site assessment for features that meet the definition of a stream wetland, or other critical area per BMC 19.40. This should include at a minimum a survey and if a stream, wetland, or other critical area is found, appropriate classification designations as required. This survey should be required when redevelopment is proposed and should be the responsibility of the property owner, if not preceded by a City survey and classification or study. Redevelopment would then need to apply appropriate mitigation measures for stream, wetlands, or other critical areas.

1.6.10.4 With mitigation, what is the ultimate outcome?

Although pollutant loads would increase under all alternatives, all new development and redevelopment must comply with current stormwater regulations to be approved. No significant unavoidable adverse impacts to stormwater are anticipated.

1.6.11 Water & Sewer

1.6.11.1 How did we analyze Water & Sewer?

EIS authors reviewed special district and service provider utility plans and corresponded with providers.

1.6.11.2 What impacts did we identify?

With new development and redevelopment expected to occur in all three alternatives as well as the Preferred Alternative, there are areas in which additional utility capacity would be required to accommodate new development.

The cost of utility upgrades is a significant unavoidable impact identified in all alternatives. Developers are responsible for the costs to design and construct improvements to local infrastructure due to increased demand. However, even if they can be lowered, these costs financially impact not only developers, but utility districts, and homeowners (either directly or through rate increases).

Water

All three alternatives as well as the Preferred Alternative would require Utility Districts to update their system technical models and planning documents. Only Highline Water District would need to update in the No Action alternative. Cast iron pipes continue to lower capacity and pressure, and raises the cost of construction for development nearby.

Sewer

Southwest Suburban Sewer District (SWSSD) and Midway Sewer would need to update their system technical models and planning documents for anticipated growth in all alternatives. Again, updates for the No Action alternative would be relatively minor. For all alternatives since anticipated growth exceeds previous 2019 planning efforts, capacity issues forecasted for SWSSD would need to be addressed sooner than the planned 2031 date. In particular, the Miller Creek WWTP would be impacted by growth in all alternatives, and is estimated to require \$51.5 million in updates.

1.6.11.3 What is different between the alternatives?

The Preferred Alternative as well as Alternatives 2 and 3 increase demand for water and sewer over Alternative 1 No Action due to increased housing and jobs. The Preferred Alternative as well as Alternatives 2 and 3 also both alter all single-family residential housing types to include some level of middle housing. What this means for utilities is that the level of demand on utilities for the traditional “residential” type of land use designation would increase, but the severity of that

increase is undetermined since this type of housing can vary greatly in actual density and therefore utility use.

Existing fire flow issues and deficient water infrastructure in the Des Moines Memorial Drive/S Normandy Rd neighborhood center included in ~~both Alternatives 2, and 3,~~ the Preferred would require updating to accommodate growth. This neighborhood is part of a large unsewered area within SWSSD, so proposed development would require extensive sewer extensions to the area, which is not currently a planned CIP project.

With growth focused on multiple widespread neighborhood centers in Alternative 2, more local utility upgrades are required for both water and sewer. More unsewered areas would need to be addressed to provide connections for development. However, in Alternative 3, most of the growth is concentrated in the largely developed Downtown Urban Center. Overall, this alternative requires less localized infrastructure upgrades since much of the infrastructure is already present and designed for higher capacities than single-family residential density. However, there are major impacts that this concentrated growth would have on the Miller Creek WWTP. Alternative 3 growth would require SWSSD to add system capacity potentially sooner than feasible. If capacity expansion is not achieved for Alternative 3, more frequent overflows untreated of wastewater into Miller Creek is expected sooner than 2031 and would occur frequently by 2031.

The Preferred Alternative provides a middle-ground alternative, providing more concentrated growth than Alternative 2 with a Downtown Urban Center proposed, but more widespread growth than Alternative 3 with Commercial/Mixed Use and Residential Medium proposed along corridors and at neighborhood nodes. This means that both localized improvements would be needed within areas proposed for denser residential land use types, and also there are major impacts that this concentrated growth would have on the Miller Creek WWTP. Preferred Alternative growth would require SWSSD to add system capacity potentially sooner than feasible. If capacity expansion is not achieved for Alternative 3, more frequent overflows untreated of wastewater into Miller Creek is expected sooner than 2031 and would occur frequently by 2031.

1.6.11.4 What are some solutions or mitigation for impacts?

The following list highlights some of the proposed mitigation measures:

- ▶ Plan elements:
 - Consider partnering with utility districts to develop tax increment financing (see RCW 39.114) to fund water and sewer improvements.
 - Partner with the utility districts to assist in promoting and facilitating latecomers' agreements.
 - Pair water and sewer utility updates with street improvements.
 - Support conversion from septic to sewer system
- ▶ Additional elements for incorporation into the Plan:
 - Educate property owners in unsewered areas about Utility Local Improvement Districts

- Partner with utility districts to consider important utility projects during development and updates of the transportation improvement plan.
 - Add coordination with utilities as part of the Complete Street Policy (BMC 12.45.010)
 - Partner with Districts through funding to accelerate studies necessary for system updates to accommodate additional growth
- Adopted measures from the Ambaum/Boulevard Park Subarea Plan and EIS
- Additional measures utility districts may consider:
- Prioritize projects that serve areas of future growth
 - Consider cost-saving pipe rehabilitation technologies, including trenchless construction methods
 - Integrate future growth projections into system technical models

All redevelopment or new development in each study area are subject to Burien Municipal Code, Chapter 13.05 Sewage Disposal Systems Code and Chapter 19.70 Adequacy of Public Facilities and Services.

1.6.11.5 With mitigation, what is the ultimate outcome?

Development would construct and pay for upgrades to aging infrastructure and extensions to utility systems to unserved areas, providing for system longevity. However, sewer improvements especially would financially impact utility districts and homeowners (either directly with connection costs or through rate increases to fund system improvements).

1.7 Equity & Climate Resiliency

The City has adopted an Equity Element of its Comprehensive Plan and identifies a practice of evaluating its plans and practices for equitable outcomes and community engagement. Additionally, state GMA goals and requirements, and regional policies in VISION 2050 and Countywide Planning Policies promote long-range planning considering environmental justice, reducing climate vulnerability, and addressing the needs of overburdened communities. [Exhibit 1.7-1](#) below summarizes equity and climate considerations of the studied alternatives. These considerations are reflected in the Burien 2044 Comprehensive Plan Update elements, especially Housing, Climate Change and Resilience, and Community Health and Wellbeing.

Exhibit 1.7-1. Summary of Equity & Climate Resiliency Considerations

Topic	Equity & Resiliency Considerations
Natural Environment: Earth	Geological hazards may increase in significance as population increases and marginal areas are proposed for development. Geologic hazards would be exacerbated by climate change. Climate change would result in increased size and frequency of stream flood events during the winter months and would result in geomorphic changes to the streambanks and floodplains. The loss of standing vegetation due to climate change due to hotter, drier, summers has implications for maintaining slope stability.
Natural Environment: Water Resources	Vulnerability of water resources in the city is expected to increase as the community grows. Landscape-scale changes associated with urbanization also tend to impact natural systems that receive runoff from new impervious surface areas. Climate change is expected to exacerbate urban stressors as projected changes including more extreme precipitation events in the wet season and greater winter flooding further disrupt natural cycles. The protection of streams, lakes, wetlands, and associated buffers are existing measures to protect these important and vulnerable resources. As climate change and urbanization further strains the City's water resources, pairing critical area protections with stormwater management improvements is an appropriate multi-pronged approach. To support resilient strategies, the City can continue to plan improvements, analyze projected needs, assess capital improvement project costs and priorities. Additionally, the City has an opportunity to demonstrate stewardship on City-owned properties and provide ongoing public education.
Natural Environment: Plants & Animals	Overall, the vulnerability and opportunities for plant and animal populations in the city are expected to increase as the city grows. Strategic planning can reduce vulnerabilities and increase plant and animal resilience. Enforcing critical area buffer and tree retention regulations, incentivizing voluntary restoration projects, and demonstrating stewardship on City-owned properties improves the resilience of plant and animal assets in the City would all have a beneficial effect in protecting and restoring plant and animal habitat and urban tree canopy. Additionally, the City's focus on incorporating climate change models into long-term planning is key to establishing best management practices (BMPs) to preserve and protect vulnerable plant and animal populations.
Air Quality	Meeting targets can help the City balance housing and jobs and enhance equity for low- and moderate-income households by providing more affordable housing choices as well as connected multimodal travel options. Future growth and development patterns under Comprehensive Plan growth strategies would affect future residences' (or other "sensitive receptors") relationships to mobile and stationary sources of air toxics and particulate matter PM_{2.5}. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to major sources of these pollutants, the emissions from these sources, and the density of future sensitive development. Under any alternative, adding more housing and residential population would expose more persons to modest levels of air emissions along high-volume roadways including First Avenue.
Land Use Patterns	Alternatives can promote active lifestyles by connecting residential areas with parks, schools, trails, and services or convenient access to transit and other employment and shopping destinations. Alternative 1 promotes the most growth in the Downtown Urban Center where there are existing services and amenities whereas Alternatives 2 and 3 <u>and the Preferred Alternative</u> promote more distributed growth in the Residential Medium along corridors and Residential Low neighborhoods with middle housing where there is variable access to parks and services. Alternative 1 would continue the 2018 Parks, Recreation, and Open Space Plan while Alternatives 2 and 3 <u>and the Preferred Alternative</u> would implement the new 2024 PROS Plan with a greater focus on equitable distribution of parks and trail infrastructure and services. Burien has areas of greater vulnerability due to extreme precipitation, sea level rise, and extreme heat. Areas with greater exposure include the marine shorelines and central Burien. Under all alternatives the City would implement its Climate Action Plan to reduce greenhouse gas emissions and to increase public information about climate change. Action aAlternatives include new and updated goals and policies in a Climate Element and promote greater resilience of the community and development. The action alternatives add strategies to address heat exposure such as trees and

Topic	Equity & Resiliency Considerations
	greenery in rights of way focused in areas of vulnerability and heat islands. Additional policies addressing adaptation, enhancement, and sea level rise are also proposed under action alternatives.
Plans and Policies	The action alternatives would adopt a new Comprehensive Plan with a new growth strategy. The new Housing Element also incorporates the newest requirements to address racially disparate impacts in housing and provide opportunities for housing under a range of income categories per GMA amendments and recent legislation requiring more flexible standards for middle housing and accessory dwelling units. In addition, the action alternatives include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change.
Socioeconomics	A climate-exacerbated risk is the potential for housing stock damage and loss, and resulting displacement of households, especially those with preexisting health conditions and limited resources. In Burien areas with the potential for housing loss include areas subject to sea level rise or increased risk of landslides due to extreme precipitation. Areas with more vulnerable populations include Inglesea and Boulevard Park. Action alternatives include an updated Housing Element, which must be amended to meet recent State requirements to provide housing for all income levels, and to remove racially disparate impacts that impede access to housing including ownership housing. The City is also evaluating middle housing opportunities to promote more housing types in single family zones. This could help increase housing supply and improve housing quality. Draft Climate Element policies also address adaptation of roads, trails, and structures along the marine shoreline, including shoreline environmental enhancement.
Noise	Portions of Burien located along major roadways and highways, and adjacent to SeaTac or King County International Airport, are exposed to relatively high noise levels. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to major sources of noise and the density of future sensitive development. Measures such as setbacks for residential and other sensitive land uses from major highways and traffic corridors are effective. Other methods to protect sensitive land uses from being exposed to substantial transportation noise levels include noise abatement and insulation requirements for new sensitive uses, and site design measures to block or obstruct transportation noise sources from residences.
Aesthetics	Growth in the form of taller buildings can increase access to scenic views of Puget Sound, Lake Burien, Olympic Mountains, and Vashon Island. Under all alternatives, buildings shadows would likely increase throughout the city due to development at greater intensities than exists today. This can increase shade and mitigate urban heat, affect solar access trees, affect solar access (hinder or provide new opportunities), <u>and</u> affect community gardens. The positive equity impacts of the greater housing supply outweigh negative impacts from increased shadows. A physical environment that supports active living (i.e., compact and complete communities with transit and amenities nearby), as well as visual and physical access to nature, improve chances at physical and mental health and wellbeing. With redevelopment under any alternative, new residential building types design would impact sociability, potentially inequitably. The action alternatives in particular have an opportunity to improve 1) the range of home types available to support people staying in the community over their lifetime and 2) the design to support social interactions, e.g., home to sidewalk transitions for chance interactions and comfortable public space, shared open space amongst neighbors, shared internal spaces in multifamily buildings including point access. Affordable commercial space, hosting a wide range of beloved local businesses (e.g., hair salons, groceries, bakeries), is found throughout the city and especially along Ambaum and downtown. With redevelopment under any alternative, without ground floor commercial requirements or incentives, it is possible new commercial space would not be included or designed to support the same types of uses and businesses. Concentrated redevelopment in transit corridors and downtown could disrupt

Topic	Equity & Resiliency Considerations
	existing cultural anchors and replace the older building stock that has supported vulnerable populations.
Transportation	Considering equity, intersections that are expected to perform below the City's standard in Alternatives 1 and 3 (the bookends including Alternative 2) could have impacts on people of color, households with limited vehicle access, and households below the poverty line. Mitigation measures are proposed to address intersections that perform below levels of service. The TMP could prioritize the improvements, as well as add multimodal opportunities. The City's Climate Vulnerability Assessment also identifies areas with heat islands that could benefit from additional tree canopy in rights of way. The action alternatives promote new policies to prioritize tree canopy and cool corridors to address populations more exposed and sensitive to extreme heat.
Public Services	Burien Police Department and Fire District 2 could continue and expand outreach and services to underserved areas and continue to build trust. Resilience to problems exacerbated by climate change could encumber police and fire/emergency service access to parts of the city due to extreme precipitation, flooding, sea level rise, and landslides. Response times may be affected by climate-exacerbated natural hazards. As police officers often work outdoors, police service may be affected by extreme heat. These considerations are expected to be similar across alternatives. Targeting fire prevention outreach in areas with older housing units is vital to alleviating fire safety inequity. Each growth alternative would result in an increase in the number of multi-family units and may require additional staff to adequately provide fire prevention services to the growing population. Highline Public Schools identify equity as a priority of their strategic plan and have enacted a number of policies to reach its goal of disrupting institutional biases and inequitable practices. Highline Public Schools has outlined procedures and policies to ensure a safe, educationally enriching, and equitable space for students, staff, and teachers of all identities. Investments in green infrastructure (urban forest canopy increases, new or enhanced parks, low impact stormwater improvements) especially where there are overburdened communities, such as in First Avenue and Downtown could reduce impervious surfaces and add tree canopy and greenery. The 2024 PROS Update is identifying gaps and opportunities in parks access.
Stormwater	Redevelopment and new development are typically more focused around urban centers, commercial zones and areas with higher and/or changes in building height allowances that attract investment in property and construction of new structures. This investment is the most frequent opportunity and a significant source of stormwater improvements since these redevelopment/developments would trigger stormwater system and facility improvements for the project area. The City can address underserved areas by using capital improvement dollars to focus more heavily on areas that are less likely to redevelop and by sizing new stormwater facility with the predicted increased flow rates anticipated due to climate change.
Water & Sewer	For septic areas that are developed, developers are responsible for the costs to design and construct improvements to local infrastructure due to increased demand. Once the sewer mainlines are constructed, they become available for other properties to connect. It is standard for the property owner of an unsewered property to be required to pay to connect into the sewer main. This cost is in the order-of-magnitude of tens of thousands of dollars and is often a burden for property owners who are financially disadvantaged. This is a consideration in the Boulevard Park area within the Valley View Special District area. Additionally, costly major system improvements that would need to be accelerated, such as updating wastewater treatment plants may require additional funding sources to make accelerating those projects feasible. One of the main funding mechanisms that utility districts use to obtain funding for improvements is through their use fees. Raising those rates to pay for improvements would also impact disadvantaged homeowners who do not redevelop their properties.

2 Preferred Alternative Focused Evaluation

The Draft EIS provides a comprehensive description of the affected environment and impacts analysis and should be consulted for context. Chapter 1 provides an evaluation of all alternatives including the Preferred Alternative for all topics addressed in the Draft EIS. This Final EIS Chapter focuses on selected topics that provide additional perspective for the Preferred Alternative regarding the Natural Environment, Plans and Policies, Transportation, and Water and Sewer.

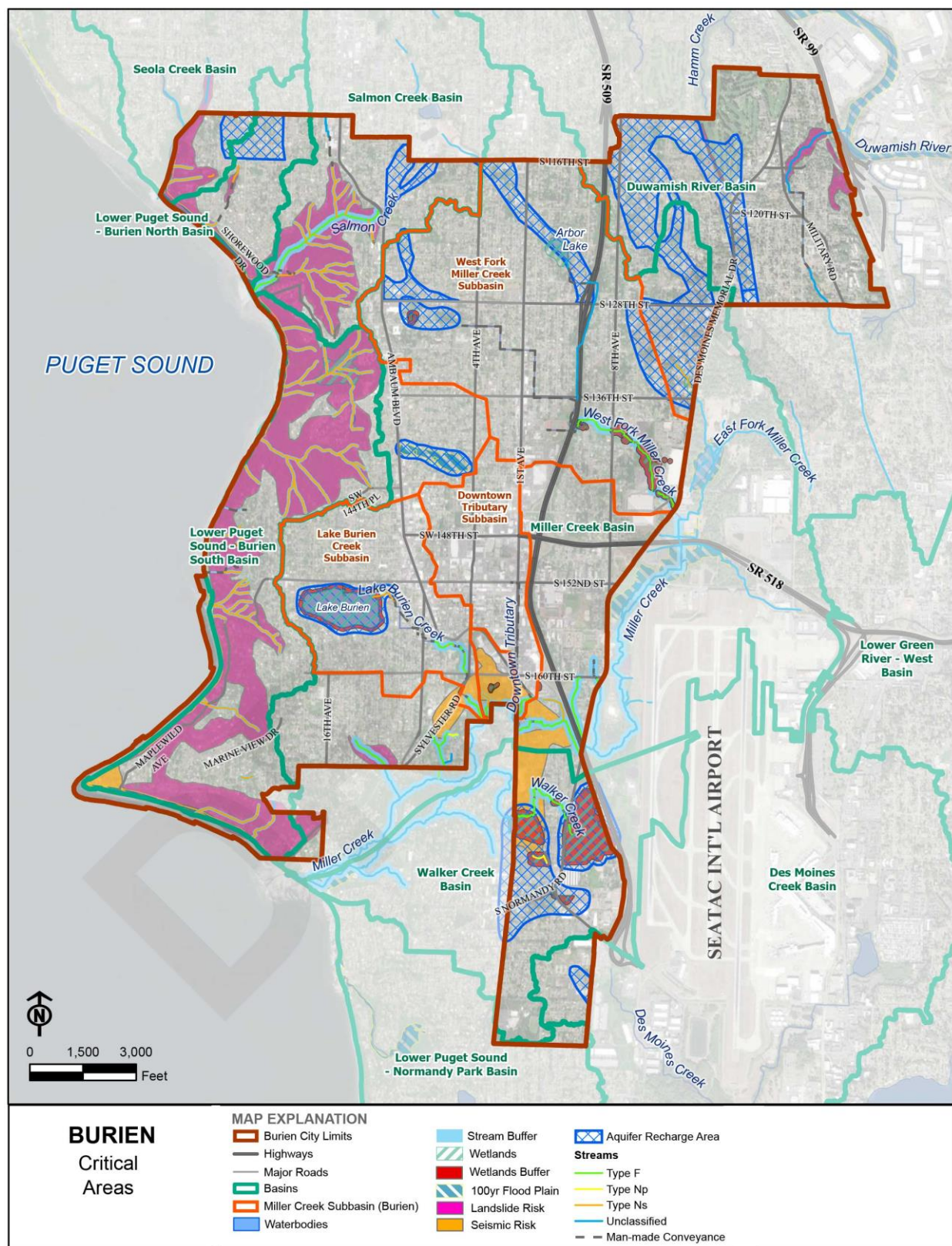
2.1 Natural Environment

2.1.1 Critical Areas and Shorelines Overview

As described in the Draft EIS, Burien residents enjoy five miles of Puget Sound shoreline, steeply wooded slopes, salmon-bearing streams, and wetlands. These provide ecosystem benefits. Burien also contains hazardous area prone to landslides and flooding. Development is managed with policies and regulations to avoid or mitigate impacts to regulated critical areas. Natural Environment resources for Burien are primarily associated with coastal shoreline areas and critical areas. Critical areas provide a variety of valuable and beneficial biological and physical functions that benefit the city and its residents, and/or may pose a threat to human safety or to public and private property. Critical areas include fish and wildlife habitat conservation areas, wetlands, critical aquifer recharge areas, flood hazard areas, and geologically hazardous areas. Exhibit 2.1-1 highlights critical areas and drainage basins.

In addition to coastal shoreline, Natural Environment resources for Burien include Lake Burien, the only lake within the City, designated as a wetland with a Shoreline Residential designation. Though this lake is a water of the State, it is encompassed by private residences. Lake Burien lies within the Lake Burien Creek Subbasin, and seasonally drains east to Lake Burien Creek, which is a tributary to Miller Creek.

Exhibit 2.1-1. Burien Critical Areas



Source: City of Burien Stormwater Management Action Plan, 2023

As described in the Draft EIS under Section 3.6, Land Use Patterns, shorelines of the state include lakes over 20 acres like Lake Burien and all marine shorelines including along Burien's Puget Sound coast. Shoreline Master Programs (SMPs) required by the Shoreline Management Act (SMA) set forth goals and regulations for the shorelines to allow for preferred shoreline uses, public access, and environmental protection.

Through its SMP, Burien has designated shorelands as shoreline residential along lakeside and marine residential lands, and urban conservancy along public parklands along the marine shoreline. Waters are designated "aquatic." See Exhibit 2.1-2.

Management policies and regulations for the shoreline residential designation address protection for riparian buffers, shoreline stabilization, vegetation conservation, critical area protection, and water quality while allowing for single-family or multifamily residential development. (BMC 20.25.020)

Management policies and regulations for the urban conservancy designation focus on public access, recreation, water oriented uses, and uses that preserve or restore the natural character of the shoreline area. (BMC 20.25.015)

Under either designation, SMP standards ensure that new development does not result in a net loss of shoreline ecological functions.

Exhibit 2.1-2. Shoreline Designations



Source: City of Burien, 2013.

2.1.2 Thresholds of Significance

The analysis of the natural environment inventory included City of Burien Critical Areas Map, prior environmental reports, and review of State and federal database information to review and compare the environmental context of Burien to plan alternatives for consideration of significant impacts and potential mitigation measures. Thresholds of Significance are listed in section 1.6.1 but for all critical areas generally include identifying impacts where inconsistent with best available science.

2.1.3 Impacts of Preferred Alternative

Impacts Common to All Alternatives identified in the Draft EIS apply to the Preferred Alternative, as the Preferred Alternative blends the land uses proposed in Alternatives 2 and 3.

Under the Preferred Alternative, low density residential, moderate density residential, and high-density housing and mixed-use areas characterize different portions of the city, with a blend of higher intensity uses around neighborhood centers as well as significantly higher intensity around the Urban Center. Development intensity avoids shoreline where majority of natural environment resources occur.

Under the Preferred Alternative, an estimated total housing capacity of 11,402 – 14,274 units allows the city to meet its target of 7,500 dwellings by 2044. This capacity supports the housing target of 7,500 by 2044. This alternative primarily increases growth in the Urban Center, and along First Avenue South, as well as Ambaum Boulevard Park and Boulevard Park with Commercial/Mixed Use at neighborhood nodes along those corridors.

- ▶ **Erosion and Landslide Hazards:** Erosion and landslide hazards are minimal for the Urban Center area, primarily associated with coastal shoreline and bluffs. Any additional development or redevelopment in currently developed areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations.
- ▶ **Seismic Hazards:** Mapped hazards are primarily associated with coastal areas and south of downtown. This area of seismic risk occurs in the Five Corners area associated with the Greater Downtown Alternative and would need to be considered for future higher density buildings in that area.
- ▶ **Shorelines, Streams, Rivers, and Lakes:** Moderate residential growth is anticipated within the developed central area of the City as well as surrounding developed corridors. With two small pockets of Commercial/Mixed Use around Lake Burien, mostly Residential Low is proposed near marine and freshwater shorelines and these designations overall are not anticipated to result in high growth potential. Shoreline and critical area regulations (including coastal areas and Lake Burien) would apply to any Future Land Use designation and provide for shoreline and habitat ecological protection, public access, and preferred uses. An increase in re-development is not likely to significantly impact surface water areas in the City Center through a slight increase in impervious surface within the basins of mapped streams. The corridors and the central area of

the city have projected development in an area with a high percentage of impervious surface; therefore, impacts to surrounding streams will be avoided with redevelopment and adherence to stormwater management regulations. Additionally, future required adoption by the City of Department of Ecology's 2024 stormwater regulations will provide more comprehensive stormwater management for redevelopment, meaning redevelopment will enhance the condition of receiving bodies of water. Greater maintenance and operational cost for new development stormwater systems is expected to be an impact of urban re-development.

- ▶ **Wetlands:** The moderate residential growth anticipated under the Preferred Alternative would not impact known wetlands. Central and eastern areas of the city are already highly developed and is mostly impervious surfaces. Wetland habitat is not assumed to be impacted directly, and water quality would not be significantly impacted as re-development provides an increase in water quality protections to an area with a high percentage of existing impervious surfaces; therefore, it is unlikely that wetlands be significantly impacted by redevelopment outside of critical areas.
- ▶ **Plants:** Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as Shoreline and Critical Areas under development regulations. Any additional development or redevelopment in outside of Critical Areas is unlikely to be significantly affected by erosion or landslides under the existing Critical Areas Regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are expected to increase tree canopy for urban and other areas of the City. Redevelopment in the Preferred Alternative is expected to occur in mostly downtown and urban up-zoned areas and to require street tree and other plantings and result in some increase of future tree canopy for redeveloped urban areas in the City.
- ▶ **Animals:** habitats of national, regional and local importance occur along the Puget Sound shoreline. Corridors such as Salmon Creek, along Puget Sound and along Walker and Miller Creek are primary habitat locations for wildlife. Internal to developed areas of the City, parks and open space areas such as Lake Burien also provide habitat for urban wildlife species. With continued growth the frequency and intensity of noise and other pollutants is expected to have further adverse repercussions on wildlife. However, implementation of codes and policies to protect and restore habitats would also have benefit.

2.2 Plans and Policies

2.2.1 Thresholds of Significance

The Growth Management Act (GMA), Puget Sound Regional Council's (PSRC) VISION 2050, and the King County Countywide Planning Policies (CPPs) establish a regulatory or policy framework with which comprehensive plans must be consistent. In addition, policy guidance established by the

City's current Comprehensive Plan provides a basis for evaluating change and potential impacts associated with the proposal.

According to WAC 365-196-210(8), consistency mean " "that no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system." For the purposes of this analysis, consistency means that the alternative can occur and be implemented together with the selected goal or policy without contradiction. Inconsistency or contradiction with plans and policies would be considered to result in a significant adverse impact.

2.2.2 Evaluation of Preferred Alternative

This section evaluates the alternatives with respect to consistency with state, regional, and local goals and requirements. The Preferred Alternative is similar to the Draft EIS studied alternatives, particularly Alternative 3 in its ability to meet both housing and job targets. It meets Urban Center activity units. It blends the land use patterns of Alternatives 2 and 3.

Growth Management Act

All alternatives are consistent with the intent of the GMA goals though Alternatives 2 and 3 and Preferred Alternative carry forward more recent GMA requirements for fair share affordable and special needs housing compared to Alternative 1. However, each of the studied alternatives would have specific impacts that must be considered at the city level. An initial discussion of the GMA goals and consistency of the alternatives can be seen in [Exhibit 2.2-1](#) below.

Exhibit 2.2-1. GMA Goal Evaluation Matrix

GMA Goal	Discussion
Encourage growth in urban areas	All alternatives focus growth in urban areas. Alternative 1 (No Action) plans for 6,499 total households based on growth capacity estimates. Action alternatives provide higher growth throughout the City with capacity for 11,870 households under Alternative 2 and 11,674 to 14,107 households under Alternative 3 by 2044 and 11,402 - 14,274 households with the Preferred Alternative. Alternatives 2 and 3 and the Preferred Alternative have capacity to plan for 7,500 housing growth targets.
Reduce sprawl	All alternatives contribute to the goal of reducing sprawl. Alternative 1 would accommodate the least amount of growth throughout the city, and the growth is more focused in the Urban Center. Alternative 2 focuses growth in the most nodes typically along corridors. Alternative 3 focuses growth in the Urban Center as well as corridors and community plan areas. Alternatives 2 and 3 focus greater housing growth consistent with 2044 targets. Only Alternative 3 provides for sufficient employment growth to meet targets.
Protect rural character	By reducing sprawl, as discussed above, all the studied alternatives would help to protect rural character in other areas of the county.

GMA Goal	Discussion
Plan for and accommodate housing that is affordable, at different densities, and preserve housing stock	All studied alternatives provide for a variety of housing, with Alternatives 2 and 3 and the Preferred Alternative providing for the greatest supply. Alternatives 2 and 3 and the Preferred Alternative provide greater variety in housing types and meet affordability targets. There may be potential for displacement but a greater capacity for housing, and strategies intended to minimize displacement. Alternative 1 would be less consistent with this goal since it cannot fully address newer Housing Element requirements for affordable and special needs housing and addressing racially disparate impacts regarding housing opportunities.
Encourage an efficient multimodal transportation system	The Action Alternatives include an updated TMP addressing multimodal transportation in the City. Alternative 1 (No Action) would retain the current TMP from 2012. The City is planning for growth around higher frequency transit (e.g., Urban Center and Ambaum Boulevard). All studied alternatives would need to provide greater transportation access to support residential and employment growth. This could include pedestrian and bicycle improvements.
Promote economic development	All studied alternatives would provide employment opportunities. Only Alternative 3 and the Preferred Alternative provide sufficient capacity to meet employment targets. It fulfills the NERA special planning area in the current Comprehensive Plan. It also increases capacity for employment in the Urban Center and First Avenue South corridor. Alternatives 2 and 3 and the Preferred Alternative provide new policies to reduce business displacement. This could include maintaining low rise retail in the Urban Center near the Town Center, and promoting business hubs, or new mixed use retail of variable sizes to avoid displacement of small businesses.
Recognize property rights	None of the studied alternatives would restrict or constrain reasonable use of property. All private land has a primary allowed residential or employment use.
Ensure timely and fair permit procedures	All studied alternatives are consistent with the goal of timely and fair permit procedures. It is anticipated that the City would continue to process permits consistent with its adopted code. In addition, action alternatives would implement a planned action or infill exemptions for Downtown that would streamline the review of projects that are consistent with the preferred growth alternative.
Protect agricultural, forest, and mineral lands	To the extent that the action alternatives provide increased capacity for future growth, they may help to reduce pressure for future growth that could impact agricultural, forest, and mineral lands elsewhere in the county.
Retain and enhance open space and support recreation opportunities	Under each of the studied alternatives, the City would need to address park and trail acreage, capacity, and facility maintenance. All alternatives would be served by a new Parks, Recreation, and Open Space (PROS) Plan adopted by spring 2024. Alternatives 2 and 3 and the Preferred Alternative anticipate growth in nodes and corridors that would improve connectivity to parks and amenities. See Section 3.9 Public Services.
Protect the environment	All studied alternatives would prioritize opportunities for conservation of wetland, stream, and buffer areas within the City per adopted policies; Alternatives 2 and 3 and the Preferred Alternative propose updates to policies

GMA Goal	Discussion
	and regulations to address natural environment protection and climate element. See Section 3.1 for additional descriptions of these features.
Ensure adequate public facilities and services	Increased growth would result in greater demand for public facilities and utilities. See evaluations in Section 3.9 Public Services. Regular service and capital planning would allow the City to set levels of service and ensure adequate facilities and services.
Foster citizen participation	Each of the studied alternatives allow for public participation. The action alternatives have been developed through an inclusive public outreach process that has included surveys, interviews, public meetings, online workshops, opportunities for written comment, and targeted engagement to meet equity goals. See Draft EIS Chapter 2 for more discussion.
Encourage historic preservation	Future development in the City would comply with state and federal requirements for protection of historic and archaeological sites.
Reduce Greenhouse Gases and promote Climate Resiliency	Action alternatives intend to implement the Climate Action Plan and Climate Vulnerability assessment with the newly required Climate Change and Resiliency Element.
Promote Shoreline Uses per Shoreline Management Act	The alternatives do not amend the Shoreline Master Program, which is due for a periodic update on an alternative cycle. All alternatives would be subject to the goals, policies, and regulations of Title 20, Shoreline Master Program. Shoreline environment designations are largely Shoreline Residential along Lake Burien and the marine shoreline, except where there are parklands which are considered Urban Conservancy. The Shoreline Residential designation policies (BMC 20.25.020) include: (a) Residential and accessory uses, recreation facilities and public access shall be the preferred uses. (b) Multifamily and multi-lot residential and recreational developments should provide public access and joint use for community recreational facilities. (c) Water-oriented recreational uses should be allowed. (d) Any new development or redevelopment should utilize low-impact development techniques where feasible. (e) Standards for building setbacks, lot coverage limitations, riparian buffers, shoreline stabilization, vegetation conservation, critical area protection, and water quality shall be set to assure no net loss of shoreline ecological functions. (f) Public access and public recreation objectives should be implemented if feasible and wherever any significant ecological impacts can be mitigated. The Residential Low (1 or 2) designations applied along the marine and lake shorelines under all action alternatives would allow for a range of middle and moderate density housing types per GMA but such uses will need to comply with SMP policies and regulations for building size, location, water quality, critical areas and other regulations to ensure no net loss of shoreline ecological function. The SMP allows for residential single family and multifamily uses per BMC 20.30.001.

Source: BERK, 2024.

VISION 2050 Regional Growth Strategy

Each alternative is compared to VISION 2050 policies in [Exhibit 2.2-2](#).

Exhibit 2.2-2. VISION 2050 Policy Summary evaluation

Policy	Discussion								
MPP-DP-1 Develop high-quality, compact urban communities throughout the region's urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use.	All studied alternatives provide for compact growth. All alternatives provide for mixed uses and a mix of housing types. Action Alternatives incorporate an updated TMP.								
MPP-DP-2 Reduce disparities in access to opportunity for the region's residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.	Through Burien 2044 update process, the City is conducting inclusive community planning including targeted engagement with businesses.								
MPP-DP-3 Enhance existing neighborhoods to provide a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and sufficient public spaces.	All alternatives promote a connected transportation network with all modes, but action alternatives would update the TMP.								
MPP-DP-9 Support urban design, historic preservation, and arts to enhance quality of life, support local culture, improve the natural and human-made environments, promote health and well-being, contribute to a prosperous economy, and increase the region's resiliency in adapting to changes or adverse events.	All alternatives support historic and cultural resources. Action alternatives would update cultural resources policies in the Land Use Element.								
MPP-DP-11 Identify and create opportunities to develop parks, civic places (including schools) and public spaces, especially in or adjacent to centers.	All alternatives would benefit from the updated PROS Plan due in spring 2044. Alternative 2 would create more centers around access to parks, schools, and other services and businesses. Alternative 3 would focus more growth in the "greater Downtown" as well as fewer nodes in Ambaum and Boulevard Park. The Preferred Alternative blends features of both alternatives.								
MPP-RGS-9 Focus a significant share of population and employment growth in designated regional growth centers.	Alternatives 1 and 3 focus more growth capacity in the Urban Center compared with Alternative 2. Alternatives 1 and 3 have planned capacity for activity units required. Alternative 2 would have lower heights proposed by the Urban Center Plan, lower than current zoning. The Preferred Alternative has a slightly smaller Urban Center boundary (less 10 acres) but a development pattern more similar to Alternative 3 with greater height and intensity. It can meet the required 45 activity units per acre.								
<table> <tr> <td>Existing Activity Units</td><td>28</td></tr> <tr> <td>Target Activity Units</td><td>45</td></tr> <tr> <td>Alternative 1</td><td>45</td></tr> <tr> <td>Alternative 2</td><td>40</td></tr> </table>		Existing Activity Units	28	Target Activity Units	45	Alternative 1	45	Alternative 2	40
Existing Activity Units	28								
Target Activity Units	45								
Alternative 1	45								
Alternative 2	40								

Policy	Discussion
	Alternative 3 37
	Alternative 3 High Rise 47
	Preferred Alternative 45
MPP-RGS-12 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.	Alternatives 2 and 3 and the Preferred Alternative achieve growth focused around high-capacity transit particularly in the Ambaum Corridor. Alternatives 1 and 3 propose growth around the transit center in the Urban Center.

King County Countywide Planning Policies

All action alternatives are consistent with the King County CPPs goals described below. To the extent that the CPPs emphasize compact centers-focused growth pattern, Alternatives 2 and 3 and provide the most housing capacity and amenities package to support this type of growth compared to Alternative 1 (No Action). See [Exhibit 2.2-3](#) for a summary of the consistency of the proposal and alternatives with pertinent King County CPP goals.

Exhibit 2.2-3. Countywide Planning Policy Evaluation Matrix

King County CPPs	Discussion
Environment Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.	Each of the studied alternatives would impact the natural environment. However, Burien continues to expand upon plans for parks, trails, and conservation of natural areas. In addition, action alternatives propose adjustments to policies and regulations for the City's critical areas and climate resilience.
Development Pattern Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently and that protects Rural and Resource Lands.	All studied alternatives would focus future growth into centers and help protect rural and resource lands elsewhere in the county. Alternatives 2 and 3 and the Preferred Alternative provide sufficient capacity for housing, and Alternative 3 provides sufficient capacity for jobs.
Urban Growth Area Goal Statement: The Urban Growth Area boundary is stable and capacity within it shall increase over time to accommodate growth consistent with the Regional Growth Strategy and growth targets through land use patterns and practices that create vibrant, equitable, and sustainable communities.	Consistent with the Regional Growth Strategy goal, all alternatives would accommodate growth in an urban area. Alternative 1 would not meet growth targets for either housing or jobs by 2044. Alternative 2 would meet housing targets but not jobs targets. Alternative 3 and the Preferred Alternative meet both housing and job targets.
Centers Goal Statement: King County grows in a manner that reinforces and expands upon a system of existing and planned high-capacity transit in central places within which concentrated residential communities and economic activities can flourish.	All studied alternatives provide for concentrated mix of residential and commercial uses. In addition, Alternatives 2 and 3 and the Preferred Alternative propose housing growth especially in nodes and corridors such as Ambaum Boulevard.
Rural Area Goal Statement: The Rural Area geography is stable and the level and pattern of growth within it provide for a variety of landscapes and open space lands, maintains diverse low-density communities, and supports rural economic activities based on sustainable stewardship of the land.	By reducing sprawl, as discussed above, all the studied alternatives would help to protect rural character in areas outside of the city.

King County CPPs	Discussion
Resource Lands Goal Statement: Resources Lands are valuable long-term assets of King County and are renowned for their productivity and sustainable management.	To the extent that the action alternatives provide increased capacity for future growth, they may help to reduce pressure for future growth that could impact agricultural, forest, and mineral lands.
Housing Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.	All studied alternatives would provide for a combination of mixed use development, smaller scale residential development, and accessory dwelling units and missing middle housing. Alternatives 2 and 3 and the Preferred Alternative would implement goals included in the Housing Action Plan and promote more missing middle housing. Alternative 1 would not implement new legislative requirements regarding housing affordability.
Economy Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.	All studied alternatives would provide employment opportunities. Only Alternative 3 and the Preferred Alternative meet jobs targets.
Transportation Overarching Goal: The region is well served by an integrated, multi-modal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.	All action alternatives seek to maximize the benefits of more frequent bus transit by locating housing, employment, and amenities near stations and stops. All action alternatives would provide greater residential development within a 10-minute walking distance and include pedestrian and bicycle improvements for improvement multimodal access. Alternative 1 would focus less growth around transit areas along Ambaum Corridor.
Public Facilities and Services Overarching Goal: County residents in both Urban and Rural Areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.	The action alternatives would enhance access to the region, help to protect the environment through increased opportunities for multimodal travel, and help to implement the Regional Growth Strategy as discussed above.

Burien Comprehensive Plan

All studied alternatives meet the intent of the Burien Comprehensive Plan policies. Alternatives 2 and 3 and the Preferred Alternative update the plan to meet local community needs for housing at all income levels, and update economic development policies and strategies. See [Exhibit 2.2-4](#).

Exhibit 2.2-4. Burien Existing Vision Statement

Vision Element	Discussion
Community members envision the City of Burien as:	
....a friendly community with well-established neighborhoods and a small town atmosphere.	All alternatives plan for the full extent of the community. All alternatives propose to grow to meet community needs for housing that is affordable at all income levels. Alternatives 2 and 3 and the Preferred Alternative would remove barriers to achieving home ownership and rental housing by removing references to size characteristics.
....a culturally diverse, safety-conscious, crime free, and people-oriented community.	Engagement for Burien 2044 has identified community support for a diverse multicultural community. Alternatives 2 and 3 and the Preferred Alternative

Vision Element	Discussion
	propose to remove barriers to attaining housing. Alternatives 2 and 3 and the Preferred Alternative propose updating policies for human services. Alternatives 2 and 3 and the Preferred Alternative update capital facilities and public services policies.
....a community that has established programs serving people of all ages.	See above.
....a community with an open, responsive, local government with active, informed citizens.	See above.
....a community with natural open spaces, neighborhood parks, paths, and trails.	All alternatives continue protection for critical areas. All alternatives would be served by an updated PROS Plan in spring 2044.
....a community that has preserved and enhanced its historic and natural features, habitat areas, and air and water quality.	All alternatives continue policies to protect cultural resources. Action alternatives propose new policies to promote environmental justice and increase climate resilience.
....a community with a local and regional transportation system that integrates cars, pedestrians, bicycles, and transit.	Action alternatives incorporate an updated TMP into the Comprehensive Plan.
....a community with a thriving, attractive, and customer-friendly city center and business areas.	All alternatives include Economic Development policies and strategies. Action alternatives would update the policies. Alternative 3 and the Preferred Alternative are the only alternatives that meet employment targets.
....a community with land use patterns that bring together individual, business and community goals.	All alternatives provide a land use pattern. It would be updated under action alternatives and better meet housing targets under Alternatives 2 and 3 and the Preferred Alternative.
....a model community with excellent police and fire services, outstanding schools, and quality community services and facilities.	Alternatives 2 and 3 and the Preferred Alternative update capital facilities and public services policies.

2.3 Transportation

This section presents a multimodal transportation evaluation of the potential impacts that may result from enacting the proposed zoning and transportation network changes in the City of Burien by adopting the Preferred Alternative. The transportation evaluation identifies significant impacts that could occur for auto, freight, and transit. Evaluations are conducted on both city and state facilities. Safety and parking impacts are also considered. Potential capital and programmatic mitigation measures are identified to address significant impacts, if any exist, of the Preferred Alternative.

2.3.1 Thresholds of Significance

The transportation thresholds of significance for the Preferred Alternative are consistent with the thresholds used to analyze action alternatives in the DEIS.

A significant impact to transportation under the Preferred Alternative is identified if the alternative:

- ▶ Would cause a study intersection that operated acceptably under Alternative 1 No Action to fall below its LOS standard or would cause an increase in delay of at least 5 seconds at a study intersection already expected to operate below its LOS standard under Alternative 1 No Action.
- ▶ Would cause a state facility that operated acceptable under Alternative 1 No Action to fall below its LOS standard or would cause an increase in vehicle-to-capacity ratio of at least 0.05 on a state facility already expected to operate below its LOS standard under Alternative 1 No Action.
- ▶ Would result in a lower likelihood of meeting the transit amenity and service goals than Alternative 1 No Action.
- ▶ Would result in a lower likelihood of meeting the pedestrian and bicycle goals than Alternative 1 No Action.
- ▶ Result in on-street parking demand substantially exceeding supply beyond the level anticipated under Alternative 1 No Action.
- ▶ Would result in a substantive increase to the number of collisions along a study segment or at a study intersection compared to Alternative 1 No Action.

2.3.2 Impacts of Preferred Alternative

2.3.2.1 Impacts Common to All Alternatives

The impacts identified as common to all alternatives in the DEIS also apply to the Preferred Alternative:

- **Pedestrian and Bicycle** – As stated in the DEIS.
- **Parking** – As stated in the DEIS.
- **Safety** – As stated in the DEIS.
- **Mode Share** - The mode share of vehicle trips, including both single occupancy vehicle (SOV) trips and high occupancy vehicle (HOV) trips would decrease while the mode share of using transit, biking, and walking would increase in both Alternative 1 No Action and Alternative 3, compared to 2022 existing conditions. The share of each mode in Alternative 1 No Action and Alternative 3 are the same. Because neither Alternative 1 No Action nor Alternative 3 (which serve as the bookends for all action alternatives) would result in

significant impacts to mode share, the Preferred Alternative is not expected to result in a significant impact to mode share.

- **VMT** – VMT per capita is expected to decrease in the future alternatives relative to existing conditions. The daily VMT per capita generated under existing land use conditions is 14.0 miles per person while in both Alternative 1 No Action and Alternative 3, the number is expected to decrease to 11.3 miles per person as more people choose to use transit, bike, or walk instead of driving and trips decrease in length with complementary land uses closer to one another. Because neither Alternative 1 No Action nor Alternative 3 (which serve as the bookends for all action alternatives) would result in significant impacts to mode share, the Preferred Alternative is not expected to result in a significant impact to mode share
- **State Facilities** - The two state facilities in the study area, State Routes 509 and 518, are both expected to meet WSDOT's LOS D standard in Alternative 1 No Action and Alternative 3 and therefore no impacts to state facilities are expected with those alternatives. Because neither Alternative 1 No Action nor Alternative 3 (which serve as the bookends for all action alternatives) would result in significant impacts to mode share, the Preferred Alternative is not expected to result in a significant impact to state facilities.
- **Transit Ridership** - Transit trips on major routes are expected to increase under the Preferred Alternative compared to both 2022 existing conditions and Alternative 1 No Action. Ridership on Route 120 (H Line), F Line, and Route 560 are expected to increase by no more than Alternative 3, which was anticipated to increase 58% from the 2022 existing conditions or by 1.4% from the Alternative 1 No Action.

2.3.2.2 Impacts of the Preferred Alternative

This section discusses potential mitigation measures targeting intersections that are expected to perform below the City's standard in both alternatives, which affect auto, freight, and transit as users of the vehicle roadway system.

The same six intersections that would perform below the City's standards under Alternative 1 and Alternative 3 are also anticipated to perform below the City's standards under the Preferred Alternative. The DEIS identified four intersections that would have delays at least 5 seconds higher with Alternative 3 compared to Alternative 1 No Action, constituting a significant impact. The Preferred Alternative is expected to yield similar growth levels at those locations and therefore is also expected to result in significant impacts at those locations. Those intersections include:

- ▶ 8th Avenue S and S 112th Street
- ▶ Des Moines Memorial Drive S and SR 518 off Ramp
- ▶ 1st Avenue S and SW 128th Street
- ▶ 24th Avenue S and S 116th Street

Near the two intersections that would not meet the LOS standard with Alternative 1 No Action but would not constitute significant impacts with Alternative 3, traffic volumes are expected to lower

than Alternative 1. Therefore, those two intersections are not expected to be significantly impacted by the Preferred Alternative. Those intersections include:

- ▶ 6th Avenue SW and SW 148th Street
- ▶ 1st Avenue S and SW 148th Street

Consistent with Alternative 3, the Preferred Alternative would result in the six intersections noted above operating at LOS F, although two of these locations would have delays slightly lower than Alternative 1 No Action.

2.3.2.3 Summary of Mitigation Measures

The mitigations identified under Alternative 3 would also apply to the Preferred Alternative, including:

- **Incorporated plan features** – The City could incorporate any mitigation projects, including those in the most recent TIP, and advance policies proposed in the Transportation Element of the Comprehensive Plan.
- **Regulations and Commitments** – The City could continue the City’s Commute Trip Reduction (CTR) program and consider other programmatic measures such as Transportation System Management and Operations (TSMO) strategies and additional Transportation Demand Management (TDM) strategies.

In addition to programmatic strategies, the City could pursue capital investments to address significant impacts to traffic operations.

Construct New Signals

Under the Preferred Alternative, the all-way-stop intersection at 8th Avenue S and S 112th Street and the two-way-stop intersection at Des Moines Memorial Dr S and State Route 518 off Ramp are expected to perform at LOS F (below the City’s standard of LOS D). The City could install signals to address the congestion and reduce delays.

The poor operations at the 6th Avenue SW and SW 148th Street intersection could also be addressed by installing a new signal. This strategy aligns with Burien’s 2022-2027 TIP project No.12.0, which commits to add a new signal with a protected left turn⁷. Specific implementation of this improvement is currently under design. Note that the Preferred Alternative would not trigger a new impact relative to the Alternative 1 condition, but this strategy would be needed to meet the City’s intersection LOS standard with any future year alternative.

⁷ See: https://cdnsnm5-hosted.civiclive.com/UserFiles/Servers/Server_11045935/File/Residents/Public%20Works/Master%20and%20Facility%20Plans/TIP%202022-2027.pdf.

Signal Timing Modifications to Address Delay

To address delays related to congestion at multiple intersections, the City could explore signal timing modifications. The signalized intersection at 1st Avenue S and SW 148th Street is expected to perform at LOS F with the Preferred Alternative. Note that the Preferred Alternative would not trigger a new impact relative to the Alternative 1 condition, but this strategy would be needed to meet the City's intersection LOS standard with any future year alternative.

Intersection Channelization Improvements to Address Delay

The intersection at 1st Avenue S and SW 128th Street is expected to operate at LOS F in the Preferred Alternative (below the City's standard of LOS D). Under the Preferred Alternative, higher volumes of westbound traffic are anticipated to turn right. The City could address this issue by adding a westbound right-turn pocket on SW 128th Street to reduce delay. Adding the right-turn pocket in the Alternative 3 Synchro 11 model indicates the intersection would operate at LOS E with a delay of less than 60 seconds. This is anticipated to be the case under the Preferred Alternative as well, because the growth in volumes at this location are anticipated to be no higher than Alternative 3. While it is not meeting the City's standard of LOS D with a threshold of 55 seconds, programmatic mitigation measures could further reduce the demand, and therefore delay, to meet the City's standard. The City's TIP includes this location for reconstruction, which could reduce the delay and improve LOS to meet the standard.

Install Roundabout

A roundabout is anticipated to address the impact at the intersection of 24th Avenue S and S 116th Street. With the current configuration, the intersection is expected to perform at LOS E and LOS F respectively under Alternative 1 No Action and Alternative 3. Because volumes with the Preferred Alternative are anticipated to be no higher than Alternative 3 at this location, the intersection is likely to perform at LOS F under the Preferred Alternative. This mitigation strategy has been incorporated with the City's 2024-2029 TIP project No.21.

Multimodal and Active Transportation Improvements

To meet GMA requirements to address recent legislation (HB 1181; RCW 36.70a.070(6)) and regional plans (VISION 2050) the City could develop a non-motorized level of service and concurrency system. A multimodal system is addressed in the TMP, integrated into the Comprehensive Plan, and is anticipated to be addressed in implementing code amendments as appropriate.

2.3.2.4 Significant and Unavoidable Adverse Impacts

Significant impacts were identified for traffic operations, freight, and transit under the Preferred Alternative. Under this alternative, six intersections are not expected to meet the City's LOS standard, four of which exceed the City's threshold of significance and are identified as an impact.

The EIS identifies mitigation strategies to address the delays related to traffic congestion at these locations; therefore, no significant unavoidable adverse impacts to the transportation system are expected.

2.4 Water and Sewer

The Preferred Alternative provides a middle-ground alternative, providing more concentrated growth than Alternative 2 with a Downtown Urban Center proposed, but more widespread growth than Alternative 3 with Commercial/Mixed Use and Residential Medium proposed along corridors and at neighborhood nodes. This means that both localized improvements would be needed within areas proposed for denser residential land use types, and also there are major impacts that this concentrated growth would have on the Miller Creek WWTP. Preferred Alternative growth would require SWSSD to add system capacity potentially sooner than feasible. If capacity expansion is not achieved for the Preferred Alternative, more frequent overflows untreated of wastewater into Miller Creek is expected sooner than 2031 and would occur frequently by 2031.

Areas where potential growth is highest compared to the No Action alternative are:

- ▶ The central Downtown Urban Center area extending south to SW 162th St in some locations (beyond the SW 160th St limit in Alternative 3) and north to 148th in most locations. This area is loosely bounded by Ambaum Blvd SW to the west and SR-509 to the east. (increased jobs and housing).
- ▶ The extension of the Downtown Urban Center area along 1st Avenue S up from the core area to S 140th St. (reduced from the SW 136th St. limit in Alternative 3) (increased jobs and housing).
- ▶ The expanded industrial area from S 138th St north to S 128th St expanded west from Des Moines Memorial Drive S provides potential for increased jobs, same as Alternative 3.
- ▶ Des Moines Memorial Drive S and S Normandy Rd nodes (same as Alternative 2) (increased jobs and housing).
- ▶ 1st Ave nodes at SW 128th St and SW 136th St with Commercial/Mixed Use along the 1st Ave S corridor (increased jobs and housing).
- ▶ 21st Avenue SW and S 152nd St node (reduced from Alternative 2, but increased from Alternative 3) (increased jobs and housing).

Additionally, housing is expected to increase under the Preferred Alternative compared to Alternative 1 throughout the city given the addition of middle housing types. Refer to the Preferred Alternative land use map for more details on various middle housing types.

Updated growth projections including the Preferred Alternative summarized for comparison in the chart below.

Exhibit 2.4-1. Growth Comparison by Alternative

	Target		Capacity				
	2019-2044	Alternative 1: No Action	Alternative 2: Optimal	Alternative 3: Optimal	Alternative 3: High Rise	Preferred: Mid	Preferred: High Rise
Housing	7,500	6,499	11,870	11,674	14,107	11,402	14,274
Jobs	4,770	1,760	2,960	4,770	5,115	4,764	5,233

Impacts on water and sewer for the Preferred Alternative are captured in the impacts identified both Alternative 2 and Alternative 3, combined. Districts could update District system models on an order-of-magnitude level based on these growth projections to verify proposed major system capacity improvements.

The City should share detailed updated zoning with Districts, once proposed.

Regular cycle capital facilities improvement, budgeting, and operational planning by the sewer and water Districts are anticipated to address increases and other changes in demand for wastewater and water services, including the need for improvements to local collection systems and facilities for the Preferred Alternative once comprehensive updated zoning is proposed.

All redevelopment or new development in each study area are subject to Burien Municipal Code, Chapter 13.05 Sewage Disposal Systems Code and Chapter 19.70 Adequacy of Public Facilities and Services.

3 Draft EIS Comment Period: Comments and Responses

The City received approximately 24 comments listed during the Draft EIS comment period January 10, 2024 to March 11, 2024. The responses are sorted by agency, interest groups, residents and a particular location at 132nd Street. See [Exhibit 2.4-1](#) to [Exhibit 2.4-4](#).

Marked comment letters are included in the appendices. In the matrices below, comments are summarized and responses are provided for each comment. Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to County decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response. See [Appendix E](#) for responses to comments that post-date the Draft EIS and relate Agency review comments and Planning Commission hearing process and City Council review and hearing process.

Exhibit 2.4-1. Agencies

Agency	Comment Summary	Response
Washington Department of Fish & Wildlife	Suggest Policy Amendments & Additions Multiple Elements.	Comment noted. The Preferred Alternative includes several policy amendments responding to the Department's comments.
Washington Department of Transportation	Prefer Alternative 3 (Land Use & Transit). Promote Ped/Bike network and active transportation.	Comment noted. The Preferred Alternative blends Alternatives 2 and 3. It includes the updated Transportation Master Plan (TMP) including active transportation investments.
Puget Sound Regional Council	Meet Growth Targets (Alt 3). Address Vision 2050 Statement, Tribal Treaty Rights. Provide TMP. Incorporate PROS Plan. Ensure consistency with Urban Center requirements.	Comment noted. The Preferred Alternative meets growth targets. It adds a statement regarding VISION 2050 and a section on Tribal Treaty rights. It incorporates by reference the TMP and PROS Plan. The TMP has been provided to PSRC and reviewed. The Preferred Alternative updates the transportation policies in response to PSRC review. The Urban Center plan meets the VISION

Agency	Comment Summary	Response
		2050 Activity Units of 45 (at 45.1) considering housing and jobs in the urban center.
King County Metro	Address how mode share changes were determined. Prefer Alternatives (2 or 3) where they lead to more ped/bike improvements.	Mode share is provided based on the regional travel demand model. The travel demand model takes into consideration land use and network changes to identify mode choice for each alternative. The Preferred Alternative blends Alternatives 2 and 3. It includes the updated Transportation Master Plan (TMP) including active transportation investments.
Water District 49	Need more detail proposed zoning to be able to comment.	Growth projections for each Alternative are provided in Section 2.3 of the EIS, but full City-wide zoning has yet to be proposed. The City sharing this with Districts once proposed is recommended in the Final EIS.

Exhibit 2.4-2. Interest Groups

Organization	Comment Summary	Response
Futurewise	► Provide land capacity and data in technical appendix and share it. ► Support Alternatives 2 and 3 – sufficient capacity with optimal densities. ► Include policies and regulations that make optimal densities likely to be constructed. Recommend setting minimum densities near transit. ► Address capacity for emergency and permanent supportive housing and provide it.	The City shared the land capacity data with Commerce and it is also provided as an appendix to this Final EIS. The Preferred Alternative blends Alternatives 2 and 3. At midpoint and optimal densities the City can meet growth targets. Additional policies have been added to the Housing Element in response to agency and public comments. The City is preparing mixed use and multifamily zoning amendments meant to incentivize growth at desired densities.
Millholin, William, nwpermit.com	► 4 dwelling units should be the minimum allowance within the RM-12 Zone (Low-Med Density) and Urban Center-Multifamily Zoned Lots. Evaluate Maximum Lot Coverage. ► Middle-housing should be made more sparse and focused around neighborhood hubs. ► HB 1110 – most will develop 3 larger units – adopt “standard plans” pre-approved.	With action alternatives and particularly the Preferred Alternative, the City is providing more flexibility in its Future Land Use Map and implementing zoning for Commercial/Mixed Use and Residential Medium areas for multifamily areas, and Residential Low 1 and 2 areas for middle housing.
Rakow, Jeff, Developer, Snowball Investments	► Density: Consider how higher density could mean longer time for development. ► Parking and Street Grid Connections: Make flexible. ► Retail: Limit retail requirements. ► Affordable Housing: Avoid transferring costs to developers like other cities.	The comments are noted and forwarded to City decision makers. The City is providing more flexibility in its Future Land Use Map and implementing zoning for Commercial/Mixed Use and Residential Medium areas for multifamily areas, and Residential Low 1 and 2 areas for middle housing. These broad changes (mirrored throughout the region in other cities) to increase capacity avoid singling out any one neighborhood for density

Organization	Comment Summary	Response
		increases. Proposed codes address adjusted parking standards and standards for creating through-block connections. Mixed use areas identify targeted retail requirements with priorities at nodes. Incentives for affordable housing include MFTE and greater building height or other flexibility. The City is providing more flexible zoning and incentives to achieve greater affordability to meet affordability requirements.

Exhibit 2.4-3. Resident Comments, Multiple Areas and Topics

Resident	Comment Summary	Response
Bailey, Elizabeth	If 8th Ave SW is made into a connector between White Center and Burien, consider allowing electric golf carts with a slow speed and weight restriction on vehicle size to use the laneway.	The comments are noted and forwarded to City decision makers.
Brungger, Mike	Favor land use Alternative 2 or some combination of 2 & 3. Prefer being zoned low residential 2 (8 th Ave S & S 112 th St), which it is not present in Alternative 3. Like idea of more middle housing types to mixed commercial/residential uses.	The comments are noted and forwarded to City decision makers. The Preferred Alternative blends Alternatives 2 and 3. At 8 th and 112 th the proposal is for Commercial/Mixed Use at the intersection and beyond is proposed Residential Medium and RL 2.
Frothingham, Neale	Go big and be bold. Provide more supply, pursue radical upzoning. 8 th Avenue S can take more traffic volumes, and is close to transit. Do a systematic review of all regulations.	The comments are noted and forwarded to City decision makers. The Preferred Alternative blends Alternatives 2 and 3. At 8 th and 112 th the proposal is for Commercial/Mixed Use at the intersection and beyond is proposed Residential Medium and RL 2. To address adequate provisions for housing, the City is addressing updated zoning, first with mixed use and multifamily zones.
Halpin, Joshua	Upzone under flight pattern, aviation will get cleaner and soundproofing better. Burien should get a light-rail station.	The comments are noted and forwarded to City decision makers. The Preferred Alternative considers opportunities for new housing as well as air and noise mitigation options. As the airport operations improve the City can revisit designations and zoning.
Pasek, JoAnn	Concern about change from single family home to Urban Center. Make more equitable zoning changes elsewhere, e.g., Lake Burien.	The comments are noted and forwarded to City decision makers. The Preferred Alternative makes an adjustment to the Urban Center Boundary to remove a bloc around S 146 th Street and 7 th Avenue SW. The Preferred Alternative shows Residential Low 2 on the north side of Lake Burien similar to Alternative 2.

Exhibit 2.4-4. Residents 132nd Street

Resident	Comments	Response
Allan, Cori Feeney, Kari Giblin, Jessica Gunning, Isabella Gunning, Lily Gunning, Steven Pippenger, Flora Polo Nunez, Alejandro Searle, Dominic Versteeg Gunning, Lynn Yugen Lewis, Michele	Concerned about mid-rise heights (above 3-4 stories). Change building heights to align with the map that was presented in the planning commission meeting on June 14, 2023. Concern about shading, congestion, limited transit, lack parks, tree removal Move density to 1st avenue.	The comments are noted and forwarded to City decision makers. The Preferred Alternative reflects the requested change to designations to achieve requested heights. The Preferred Alternative does adjust density between the Ambaum Corridor and 1 st Avenue S.

4 Clarifications and Corrections

4.1 Summary

See Chapter 1 of this Final EIS which addresses the Preferred Alternative and identifies updates in track changes.

4.2 Proposal & Alternatives

No changes.

4.3 Environment, Impacts, & Mitigation Measures

4.3.1 Natural Environment

Draft EIS page 3-2, second paragraph, add and identify "... Lake Burien as a freshwater shoreline in Burien".

Burien residents enjoy Lake Burien as a freshwater shoreline in Burien and five miles of Puget Sound shoreline, steeply wooded slopes, salmon-bearing streams, and wetlands. These provide ecosystem benefits. Burien also contains hazardous area prone to landslides and flooding. Development is managed with policies and regulations to avoid or mitigate impacts to regulated critical areas. Natural Environment resources for Burien are primarily associated with coastal shoreline areas and critical areas.

Draft EIS page 3-18, Alternative 2: Neighborhood Centers, bullet regarding shorelines is amended as follows:

- Shorelines, Streams, Rivers, and Lakes: Moderate residential growth is anticipated within the developed central and west areas of the City. Residential Low is proposed near marine and freshwater shorelines and is not anticipated to result in high growth potential; shoreline and critical area regulations (including coastal areas and Lake Burien) would apply to any Future Land Use designation and provide for shoreline ecological protection, public access, and preferred uses. An increase in re-development is not likely to significantly impact surface water areas in the Urban Center through a slight increase in impervious surface within the basins of mapped streams. This alternative up-zones corridors and the Urban Center that has projected development in an area with a high percentage of impervious surface and drainage systems designed to older standards that are not as effective as current standards; therefore, impacts to surrounding streams will be avoided with redevelopment and adherence to stormwater management regulations ~~for such with~~ redevelopment. Additionally, future required adoption by the City of Department of Ecology's 2024 stormwater regulations will provide more comprehensive stormwater management for redevelopment, meaning redevelopment will enhance the condition of receiving bodies of water. Greater maintenance and operational cost for new development stormwater systems is also expected to be an impact of urban re-development.

Draft EIS page 3-19, Alternative 3: Greater Downtown, bullet regarding shorelines is amended as follows:

- Shorelines, Streams, Rivers, and Lakes: High rise and mid-rise residential in the Urban Center and greater downtown and moderate residential growth in Residential Low areas elsewhere are anticipated within the developed central and east areas of the city. Residential Low is proposed near marine and freshwater shorelines and is not anticipated to result in high growth potential; shoreline and critical area regulations (including coastal areas and Lake Burien) would apply to any Future Land Use designation and provide for shoreline ecological protection, public access, and preferred uses. An increase in re-development is not likely to significantly impact surface water areas in the Urban Center through a slight increase in impervious surface within the basins of mapped streams. The central area of the city already contains a high percentage of impervious surface; therefore, impacts to surrounding streams will be avoided with redevelopment and adherence to stormwater management regulations ~~with for such~~ redevelopment. Additionally, future required adoption by the City of Department of Ecology's 2024 stormwater regulations will provide more comprehensive stormwater management for redevelopment, meaning redevelopment will enhance the condition of receiving bodies of water. Greater maintenance and operational cost for new development stormwater systems is expected to be an impact of urban re-development.

Draft EIS page 3-28, Alternative 2: Neighborhood Centers, bullet regarding plants is amended as follows:

- Plants: Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as Shoreline and critical areas under development regulations. Any additional development or redevelopment in outside of critical areas is unlikely to be significantly affected by erosion or landslides under the existing critical areas regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are intended to increase tree canopy for urban areas and other areas of the City. Redevelopment in Alternative 2 is expected to occur in rezoned areas and to require street tree and other plantings and result in an increase of future tree canopy for redeveloped urban areas in the city.

Draft EIS page 3-29, Alternative 3: Greater Downtown, bullet regarding plants is amended as follows:

- Plants: Erosion and landslide hazards are associated with remaining forested canopy areas for coastal shoreline and bluffs. These areas are regulated as Shoreline and critical areas under development regulations. Any additional development or redevelopment in outside of critical areas is unlikely to be significantly affected by erosion or landslides under the existing critical areas regulations. Existing tree canopy within and surrounding other critical areas, such as Lake Burien, is unlikely to be significantly affected by growth due to critical area regulations. City code and policy initiatives are intended to increase tree canopy for urban areas and other areas of the City. Redevelopment in Alternative 3 is expected to occur in rezoned areas and to require street tree and other plantings and result in an increase of future tree canopy for redeveloped urban areas in the city.

4.3.2 Air Quality

No changes.

4.3.3 Land Use Patterns

No changes.

4.3.4 Plans and Policies

Amend section 3.4.1, Affected Environment, Washington State Growth Management Act (GMA)

The Washington State GMA was adopted in 1990 in response to concerns over uncoordinated growth and its impacts on communities and the environment. The GMA includes ~~13~~15 planning goals to help guide its implementation. These goals address the following: 1) encouraging growth in urban areas, 2) reducing sprawl, 3) encouraging multimodal

transportation systems, 4) encouraging a variety of housing types, including affordable housing, 5) encouraging economic development, 6) recognizing property rights, 7) ensuring timely and fair permitting processes, 8) protecting agricultural, forest and mineral lands, 9) retaining and enhancing open space and supporting recreation opportunities, 10) protecting the environment, 11) encouraging citizen involvement in planning processes, 12) ensuring adequate public facilities and services, 13) encouraging historic preservation, 14) reduce greenhouse gases and promote climate resiliency, and 15) promote shoreline uses per Shoreline Management Act.

4.3.5 Socioeconomics

Amend Section 3.5.1.4, Economic Development, as follows:

Burien has a total of ~~11,678~~12,700 jobs as of 2022, with the services sector accounting for over half of total employment with 6,097 jobs. Burien employment growth has been steady since 2014, with no significant increase or decrease until 2021 when Burien saw the greatest decrease in employment growth, netting a negative 6.55%. See [Exhibit 3.5-11](#).

4.3.6 Noise

No changes.

4.3.7 Aesthetics

No changes.

4.3.8 Transportation

Amend Section 1.6.82, What impacts did we identify?, as follows:

- ▶ **8th Avenue S and S 112th Street**
- ▶ 6th Avenue SW and SW 148th Street
- ▶ 1st Avenue S and SW 148th Street
- ▶ **Des Moines Memorial Drive S and SR 518 off Ramp**
- ▶ **1st Avenue S and SW 128th Street**
- ▶ **24th Avenue S and S 116th Street**

All six intersections are identified with significant impacts under Alternative 1, but only the four intersections in **bold** are identified with significant impacts under Alternative 3. Mitigations are identified for each impact.

Amend Section 1.6.84, What are some solutions or mitigation for impacts?, as follows:

This EIS identified four mitigation strategies. The four mitigation solutions include:

- ▶ Installing new signals at the following intersections: 8th Avenue S and S 112th Street, Des Moines Memorial Drive S and SR 518 off Ramp, and 6th Avenue SW and SW 148th Street.
~~8th Avenue S and S 112th Street~~
- ▶ Modifying intersection signal timing plans at 1st Avenue S and SW 148th Street.
- ▶ Adding a right turn pocket at 1st Ave S and SW 128th Street.
- ▶ Installing a roundabout at the intersection of 24th Avenue S and S 116th Street.

4.3.9 Public Services

Amend, 3.9.3.2, Regulations & Commitments, Fire and Emergency Medical Service

Pursuant to Burien Municipal Code Chapter 15.20.200, Burien has adopted all standards of the 2018 International Fire code as well as the Washington State Building Code.

Commitments include the following:

- ▶ Fire-flow requirements for buildings
- ▶ Fire hydrant locations and distribution
- ▶ Fire apparatus access roads
- ▶ Hazardous materials Management Plans and Inventory Statements
- ▶ High-Rise Buildings and Automatic Sprinkler Systems

4.3.10 Stormwater

Amend Section 3.1.10, pages 3-227 and 3-228, to address conditions post 2020 in stormwater:

As of 2020, ~~The~~ City of Burien stormwater system services approximately ten square miles with 112 miles of storm drain and approximately 6,000 drainage structures publicly maintained. The City storm system includes seven drainage basins, which receive flow from outside the city limits. Eleven deficient areas within the stormwater system were identified in the 2020 Storm Drainage Master Plan and identified for small works or capital improvement projects and are located on in [Exhibit 3.10-3](#) and listed in [Exhibit 3.10-4](#). Along with the ~~12~~twelve deficient areas, much of the infrastructure the City obtained from King County during past incorporations has reached or exceeded its design life and requires replacement.

A complete inventory of existing stormwater infrastructure (as of September 2019) is listed in [Exhibit 3.10-1](#) and depicted in [Exhibit 3.10-2](#). The City has made significant investments

in assets since 2020 and has an online interactive map where the data is updated as needed.

The seven drainage basins within City limits include Miller Creek, Lower Puget Sound - South, Duwamish River, Salmon Creek, Lower Puget Sound - North, Seola Creek, and Des Moines Creek drainage basins (listed in order from largest to smallest). A significant amount of flow from these basins originates outside city limits and drains into city limits. See **Exhibit 3.10-3**.

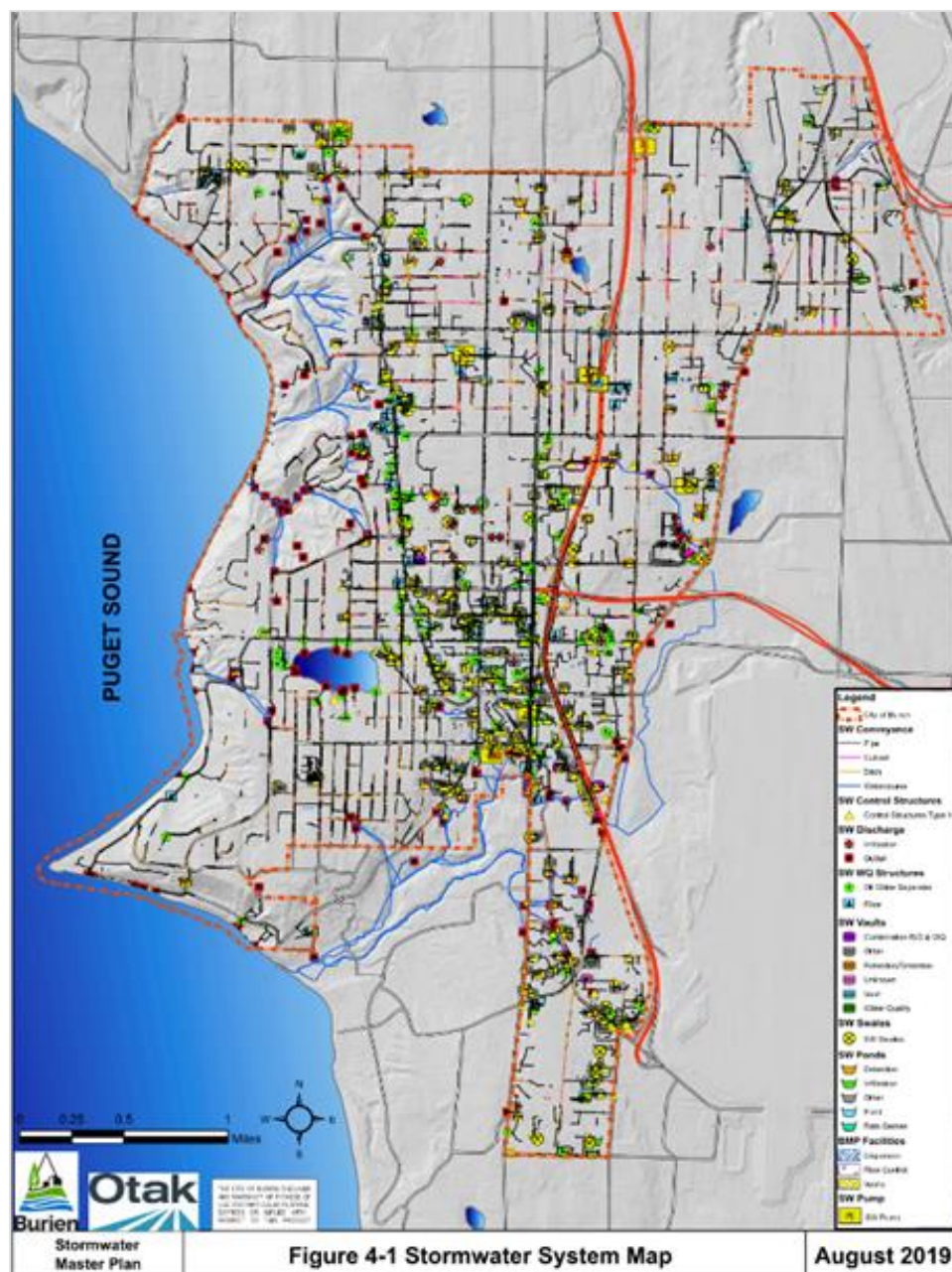
Exhibit 3.10-1. Existing Stormwater Inventory Summary

Type	Right-Of-Way	Parks	City Owned Property	Private Property	Total in City
Stormwater Ponds	0	2	13	47	62
Control Structures	71	4	12	256	343
Water Quality Structures	25	1	4	151	181
Vaults	32	1	4	187	224
Pump Stations	2	0	1	10	13
Catchments (catch basins, yard drains, manholes etc.)	6,176	155	155	4,176	10,662
Discharge Points (Outfalls, Infiltration)	41	27	30	107	205
Culvert (ft)	35,188	448	515	3,113	39,263
Ditch (ft)	115,026	2,005	2,337	21,459	14,082
Pipe (ft)	502,135	14,007	17,117	226,413	859,673
Swale (ft)	331	85	444	2,241	3,101
Other (ft)	4,469	979	1,083	10,370	17,502

Note: See the City's stormwater map online for current information: <https://ogtx.burienwa.gov/ExternalViewer/index.html?viewer=Stormwater>.

Source: 2020 Burien Stormwater Master Plan Update

Exhibit 3.10-2. Burien Stormwater System Map



Note: See the City's stormwater map online for current information:
<https://ogtx.burienwa.gov/ExternalViewer/index.html?viewer=Stormwater>.
 Source: 2020 Burien Stormwater Master Plan Update

4.3.11 Water & Sewer

No changes.

5 Acronyms & References

5.1 Acronyms

AADT	Annual Average Daily Traffic
ADA	Americans with Disabilities Act
AIAN	American Indian and Alaskan Native
AWSC	All-way stop control
BMC	Burien Municipal Code
BMPs	Best Management Practices
CARA	Critical Aquifer Recharge Area
CBGs	Census Block Groups
CCA	Climate Commitment Act
CIP	Capital Improvement Program
CIPP	Cured in Place Pipe
CLT	Community Land Trust
CO	Carbon Monoxide
CPPs	King Countywide Planning Policies
CTR	Commute Trip Reduction
CWA	Clean Water Act
dB	Decibel
dBA	A-weighted Sound Level
DNL	day-night average sound level
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EPA	U.S. Environmental Protection Agency
est	estimated
ETC	Employee Transportation Coordinator
FGTS	Freight and Goods Transportation System
FHWA	Federal Highway Administration
GHG	Greenhouse Gas
GMA	Growth Management Act
HAPs	Hazardous Air Pollutants

HCM	Highway Capacity Manual
HUD	U.S. Department of Housing and Urban Development
KCFD #2	King County Fire District #2
KCM	King County Metro
KCSO	King County Sheriff's Office
KCSPPM	King County Stormwater Pollution Prevention Manual
KCSWDM	King County Surface Water Design Manual
lbs	pounds
Ldn	Day-Night Average Sound Level
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent Noise Level
Lmax	Maximum Noise Level
LOS	Level of Service
MGD	Million Gallons Per Day
MSATs	mobile source air toxics
MPH	Miles per Hour
MSATs	Mobile Source Air Toxics
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Protection Act
NHOPI	Native Hawaiian or Pacific Islander
NOx	oxides of nitrogen
NO2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O3	ozone
PaRCS	Burien Parks, Recreation & Cultural Services Department
Pb	lead
PHS	Priority Habitats and Species
PSCAA	Puget Sound Clean Air Agency
PM	Particulate Matter
PM2.5	Particles that are less than or equal to 2.5 microns in diameter
PM10	Particles equal to or less than 10 microns in diameter
PRM	permittee-responsible mitigation
PSRC	Puget Sound Regional Council
RCW	Revised Code of Washington
ROGs	reactive organic gases
SIP	State Implementation Plan
SMA	Shoreline Management Act
SMP	Shoreline Master Program
SOV	Single Occupancy Vehicle
SPPM	City of Burien Stormwater Pollution Prevention Manual
SR	State Route
ST	Sound Transit
SWMP	Stormwater Management Program

Ch.5 Acronyms & References

SWSSD	Southwest Suburban Sewer District
TDM	Travel Demand Management
TAPs	Toxic Air Pollutants
TCP	Transportation Conformity Plan
TSMO	Transportation Systems Management and Operations
TWSC	Two-way stop control
ULID	Utility Local Improvement District
USGS	U.S. Geological Survey
V/C	Volume to Capacity
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WNHP	Washington Natural Heritage Program
WQ	Water Quality
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation

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See also Stormwater.

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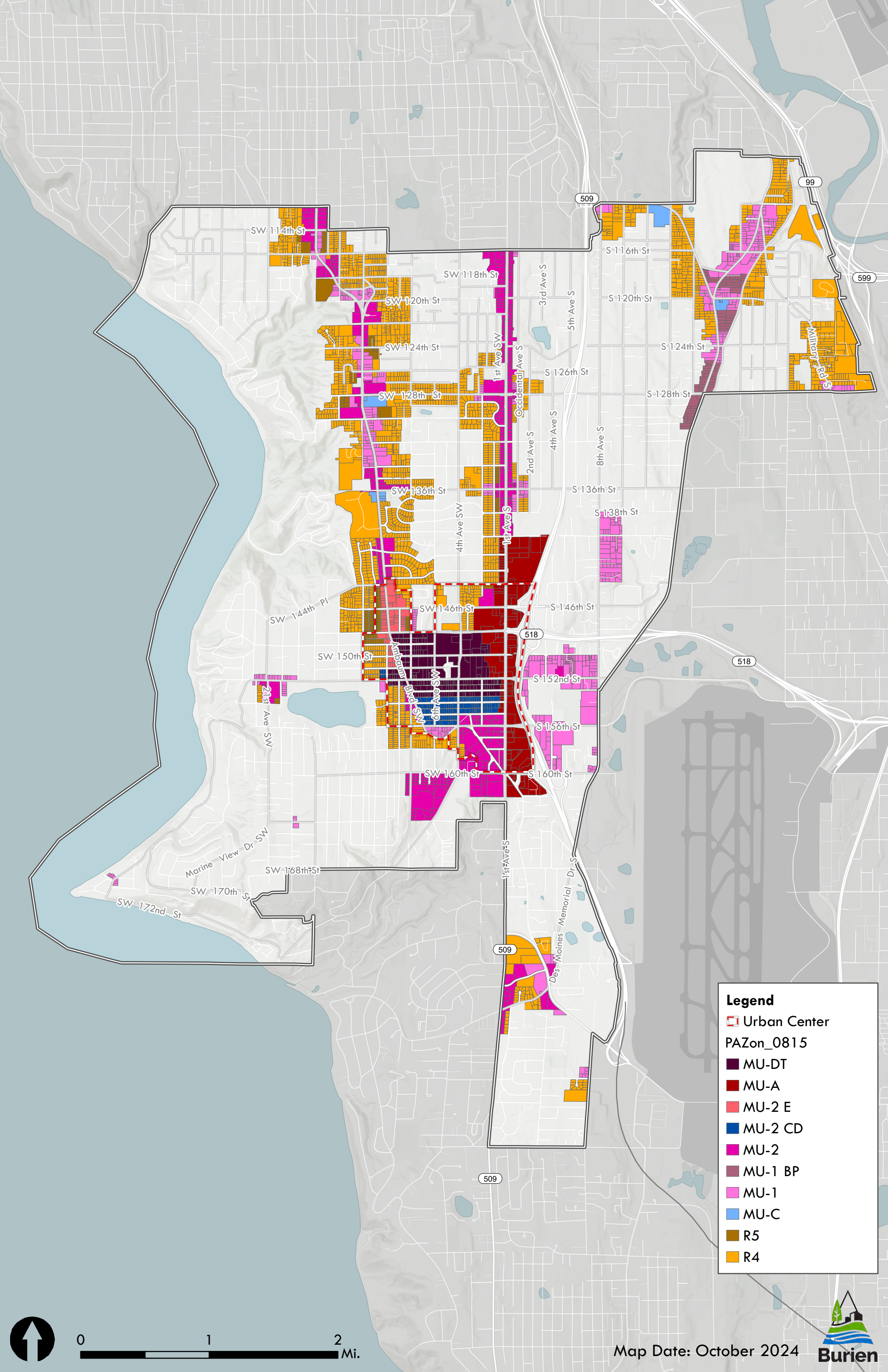
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6 Appendices

- A Preferred Future Land Use and Zoning Maps October 2024
- B Marked Comment Letters
- C Land Capacity Evaluation
- D Draft Planned Action Ordinances
- E Comments After DEIS Comment Period

A Preferred Future Land Use and Zoning Maps October 2024



Legend

- Urban Center
- PAZon_0815
- MU-DT
- MU-A
- MU-2 E
- MU-2 CD
- MU-2
- MU-1 BP
- MU-1
- MU-C
- R5
- R4

B 60-day Comment Period: Marked Comment Letters

Table of Contents

1_WDFW Comp Plan Comments Email and Comments_2023_0123	2
2_WSDOT_2024.03.11	11
3_PSRC_2024.02.27	13
4_King County Metro_2024_0124	17
5_Water District 49_2024_0311	20
6_Futurewise Cover Email and Letter_2024_0307	22
1_Futurewise Cover Email	22
2_3-7-2024 FW Comments on Burien 2024 Comp Plan Periodic Review Affordable Housing Focus	24
7_Millhollin_William_NWPERMIT_2024_0112	28
8_Millholin_Email_Cover_and_Letter_2024_0124	30
1_Millholin_Email_Cover_2024_0124	30
2_Millholin_Email - Public Comment - Draft 2044 Comprehensive Plan	38
9_Rackow_Jeff_2024_0301	40
10_Allan_Cori_2024_0310	44
11_Bailey_Elizabeth_2024_0209	46
12_Brunngger_Mike_2024_0117	48
13_Feeney_Kari_2024_0309	49
14_Frothingham_Neale_2024_0306	51
15_Giblin_Jessica_2024_0310	54
16_Gunning_Isabella_2024_0309	55
17_Gunning_Steven_2024_0309	56
18_Halpin_Josh_2024_0310	57
19_Pasek_Joann_2024_0122	59
20_Pasek_Joann_2024_0307	61
21_Pippenger_Flora_2024_0310	62
22_Polo Nunez_Alejandro_2024_0310	64
23_Searle_Dominic_2024_0305	66
24_Versteeg Gunning_Lynn_2024_0309	68
25_Yugen Lewis_Michele_2024_0305	69
26_Gunning_Lily_2024_0309	72

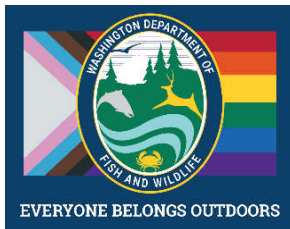
From: Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>
Sent: Tuesday, January 23, 2024 4:17 PM
To: Douglas, Julian K (DFW); Amanda McIntire; Alex Hunt
Cc: Berejikian, Marian (DFW); Vanegas, Ted (COM); Whittaker, Kara A (DFW)
Subject: RE: WDFW GMA Assistance
Attachments: WDFW Comp Plan Comments.pdf

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Hi Amanda and Alex,

I wanted to provide you with WDFW's comments regarding the most recent draft of Burien's Comprehensive Plan. We appreciate the extensive effort Burien has taken to incorporate key environmental aspects in this version of the plan. Please don't hesitate to reach out if you have any comments or questions.

All the best,



Morgan Krueger (she/her)
Regional Land Use Planner, Habitat Division
Washington Dept. of Fish and Wildlife
Region 4
Morgan.Krueger@dfw.wa.gov
206-707-5434

From: Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>
Sent: Thursday, December 7, 2023 8:42 AM
To: Amanda McIntire <AmandaMc@burienwa.gov>; Alex Hunt <AlexH@burienwa.gov>
Cc: Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>; Whittaker, Kara A (DFW) <Kara.Whittaker@dfw.wa.gov>; Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>
Subject: RE: WDFW GMA Assistance

Hi Amanda,

Thank you for the update. I'll be sure to check the website in the coming weeks and I look forward to reviewing the draft plan when it's available. WDFW appreciates the opportunity to review and provide feedback on these important aspects of Burien's future plans. Thanks,

Julian Douglas
Habitat Biologist
Washington Department of Fish and Wildlife
Mobile: 206-584-9808 | Email: Julian.Douglas@dfw.wa.gov

From: Amanda McIntire <AmandaMc@burienwa.gov>
Sent: Wednesday, December 6, 2023 4:39 PM

To: Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>; Alex Hunt <AlexH@burienwa.gov>
Cc: Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>; Whittaker, Kara A (DFW) <Kara.Whittaker@dfw.wa.gov>; Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>
Subject: RE: WDFW GMA Assistance

External Email

Good Afternoon Julian,

Thank you for reaching out! I apologize I did not reach back out sooner.

I did want to let you know that Alex Hunt, our Senior Long Range Planner, has provided me with the materials that were shared in a previous meeting. Currently, we are focusing our long range efforts on the Comprehensive Plan. We will be publishing the draft Comprehensive Plan in the next few weeks if you would like to review; that document will be accessible on Burien's website [here](#) when it is posted. If you have any questions regarding accessing the documents, or about the plans, please do not hesitate to reach out.

We plan on taking a look at the critical area ordinance update next year, and would very much appreciate your comments, insight, and ideas. When we begin the process, we will make sure to reach out and set up a meeting to discuss.

Best,
Amanda McIntire (she/her)
Assistant Planner

City of Burien
(206) 248-5519 Office
(206) 507-2674 City Cell
AmandaMc@burienwa.gov
Burienwa.gov

We are currently experiencing delays in permit processing. We apologize for any inconvenience and appreciate your patience as we transition to our new permit system!

Permit Counter Hours

The Permit Center provides permitting customer service in-person, over the phone, and through email.

In-person service - 9am-Noon Monday- Thursday | Telephone and Email service 9am-4pm Monday-Thursday | Closed Daily - Noon-1pm (M-Th)
No In-Person service on Fridays (including email, phone calls, and accepting payments)

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From: Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>
Sent: Tuesday, December 5, 2023 1:27 PM
To: Amanda McIntire <AmandaMc@burienwa.gov>; Alex Hunt <AlexH@burienwa.gov>
Cc: Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>; Whittaker, Kara A (DFW) <Kara.Whittaker@dfw.wa.gov>; Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>
Subject: RE: WDFW GMA Assistance

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Hi Amanda and Alex,

I hope everything is going well and you're able to stay dry through all this rain! Unfortunately I'm unable to attend the Open House tomorrow to discuss the Comp Plan Update. Since a bit of time has passed since our last email, I wanted to check on a couple of items:

1. Does Burien have a draft prepared for any sections of the Comp Plan Update that we can review? If so, please let me know where I can find any of those documents, and if you have a date that you'd like to receive comments by.
2. When does Burien plan to work on an update to the Critical Areas Ordinance? If this is something the City intends to review in the near future, we'd very much appreciate an opportunity to comment and provide some ideas.

Thank you,

Julian Douglas
Habitat Biologist

Washington Department of Fish and Wildlife

Mobile: 206-584-9808 | Email: Julian.Douglas@dfw.wa.gov

From: Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>

Sent: Thursday, October 5, 2023 10:20 AM

To: Amanda McIntire <AmandaMc@burienwa.gov>

Cc: Alex Hunt <AlexH@burienwa.gov>; Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>; Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>

Subject: RE: WDFW GMA Assistance

Hi Amanda,

Sorry for the late response. It looks like I was not on the list of recipients for the previous email below. No matter! Thank you so much for taking the time to reach back out to us. We would be happy to set something up again. We met with Alex Hunt and Susan McLain back on July 7th to go over WDFW best available science information, but would be happy to set something up to bring you into the conversation. At the last meeting, the notes provided to me (I did not attend) state that the city was not planning to update their CAO anytime soon. Has this changed? Thanks in advance for the clarification!

All the best,



Morgan Krueger (she/her)
Regional Land Use Planner, Habitat Division
Washington Dept. of Fish and Wildlife
Region 4

Morgan.Krueger@dfw.wa.gov
206-707-5434

From: Amanda McIntire <AmandaMc@burienwa.gov>
Sent: Friday, September 15, 2023 8:47 AM
To: Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>
Cc: Alex Hunt <AlexH@burienwa.gov>
Subject: RE: WDFW GMA Assistance

External Email

Good Morning Morgan,

Thank you for reaching out with the opportunity to learn more about the best available science for the protection of fish and wildlife.

I would love to coordinate a time to connect, and gain a basic understanding of any updates, as well as learn about the science behind the protections. I am assisting with the initial scoping of the CAO update, and have included our long range planner, Alex Hunt, in this email.

Do you have specific days/times that you would be available to meet? I would be very interested in a presentation in order to gain understanding in the next steps.

Best,
Amanda McIntire (she/her)
Assistant Planner

City of Burien
(206) 248-5519 Office
(206) 507-2674 City Cell
AmandaMc@burienwa.gov
Burienwa.gov

Permit Counter Hours

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No In-Person service on Fridays (including email, phone calls, and accepting payments)

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From: Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>
Sent: Thursday, September 14, 2023 12:22 PM
To: Public - Planning <planning@burienwa.gov>
Cc: Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>
Subject: WDFW GMA Assistance

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Hi Susan,

I wanted to reach out to you and provide a couple great resources WDFW has recently updated, which you can find attached to this email. We are committed in meeting your planning needs as deadlines quickly approach for code amendments, Comprehensive Plan updates, and more. Our duty is to provide Best Available Science resources, but we feel if we just stopped there, we would not be doing our job. **Please reach out to the *updated* point of contact** listed on the attached letter with any questions, concerns, or just to chat. We would be more than happy to set up a time to meet your planning team, give a presentation, go through our science, or all the above to better meet your specific planning needs.

We look forward to hearing from you soon,



Morgan Krueger (she/her)

Land Use Environmental Planner, Habitat Division
Washington Dept. of Fish and Wildlife
Region 4

Morgan.Krueger@dfw.wa.gov

206-707-5434



State of Washington

Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

January 23, 2024

City of Burien
Amanda McIntire, Assistant Planner
(206)-248-5519
AmandaMc@burienwa.gov

Dear Amanda McIntire,

On behalf of the Washington State Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on the early draft of Burien's Comprehensive Plan, as part of the Periodic Update review period. We provide our comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local governments. Specific comments on the draft Comprehensive Plan are provided in the following table.

We encourage you to reference the newly published [Sound Choices checklist](#) from Department of Natural Resources as you update your Comprehensive Plan. This checklist can help guide your update with watershed-wide protection in mind.

Table 1. Recommended changes to draft Comprehensive Plan language.

Policy Number	Policy Language	WDFW Comment
Land Use Policy 2.1-7	Encourage redevelopment and development of underutilized and vacant land to be compatible with the envisioned scale and design of surrounding development and/or considered for open spaces designed and sited to connect habitat, walking trails, and outdoor recreation throughout the city. (Pol. LU 1.6)	WDFW suggests incorporating tactics for creating open space and open space corridors (WAC 365-196-335) for the many benefits they provide to people and wildlife.
Land Use Policy 2.3-2	Prepare the Urban Center for development readiness through specific guidelines and updated environmental review, which shall incentivize Low Impact Development, roof gardens, and other green infrastructure tactics. (Pol. UC. 2)	We suggest stating actionable items that will achieve the 'green and healthy' goals within this comprehensive plan.
Land Use Policy 2.6-3	Ensure that sidewalks, paths, through-block connections, and trails, are furnished, when	Vegetation cools pedestrian areas where impervious surfaces increase heat island effects, while also providing habitat for birds and other wildlife species.

	appropriate and needed, with lighting, seating, landscaping, trash receptables, bike racks, railings, and all ages and abilities access to encourage people walking/rolling/biking. Amenities such as sculptures, planters, shade producing vegetation , and water features should be provided to encourage human activity in focal points.	
Land Use Policy 2.6-5	Integrate appropriate street tree species and other vegetation in planting strips and other landscaped right of way areas. Prioritize linking these areas for human and wildlife use. Provide adequate rooting space to limit damage to street infrastructure.	Planning for linkages within vegetated strips, or habitat corridors, provides benefits to both wildlife and people (WAC 365-196-335).
Community Health and Well Being Policy 7.1-4	To provide access to greenery, cooling benefits, and enhanced community identity and natural beauty, promote the retention and maintenance of exceptional and/or significant trees and ensure that removed trees are appropriately replaced. Encourage the use of native, hardy, and climate-ready vegetation in streets, landscaping, and buffer areas with development, and ensure all landscaping plans use best available science.	It is important for the longevity of landscaping to use best available science to determine the correct species, age class, replacement ratio, etc., to be used. With respect to removed trees we recommend defining or providing guidance for the interpretation of "appropriately replaced."
Community Health and Well Being Policy 7.7-1	Link increased intensity of development with increased people-oriented design, such as ground floor building design for human interest, through-block connections at a human scale, public spaces, view creation, street trees, rooftop gardens , and sunlight and shade considerations with a changing climate. (New)	Adding incentives for green spaces, on or above the ground, results in benefits to the environment and people.
Sustainability and Natural Environment Policy 8.2-4	Consider the impacts of new development on water quality as part of its environmental review process and require, where appropriate, Low Impact Design and any mitigation measures. (Amended Pol. EV 2.4)	It is important to include policies that call-out LID, as this is suggested as the preferred, and one day most commonly used, approach for site development.

Sustainability and Natural Environment New Policy, Goal 8.1	Suggested Policy: Integrate information from local watershed planning processes, salmon recovery plans, climate change plans, ecosystem recovery plans, and relevant tribal plans to identify important habitats and species of local and tribal importance.	We suggest aligning local planning with information that is presently available across adjacent jurisdictions. Protecting and restoring environmental processes and ecological functions requires watershed-wide planning.
Sustainability and Natural Environment Policy 8.4-3	Protect, conserve, and enhance fish and wildlife habitat, including: Additional suggestion g. The Washington Department of Fish and Wildlife Priority Habitats and Species list and mapping resources	We suggest including this additional source. The Washington Administrative Code refers to PHS in sections dealing with Critical Area Ordinances, Shoreline Master Programs, and the Essential Facilities Siting Evaluation Council. The state supreme court has held that PHS is a valid source of best available science for the Growth Management Act.
Sustainability and Natural Environment New Policy, Goal 8.4	Suggested Policy: Whenever possible, replace culverts with bridges wide enough to permit movement of terrestrial wildlife species to restore habitat connectivity.	Finding opportunities to connect wildlife habitat in the built environment is often challenging. Innovative design, such as bridges wide enough for wildlife to pass beneath, is an instrumental tool in accomplishing this goal.
Climate Change and Resiliency Policy 9.14-3	Incorporate hydrologic climate impacts into design of water-crossing structures (culverts and bridges).	We suggest using materials, such as WDFW's Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report , in achieving this goal.
Climate Change and Resiliency New Policy, Goal 9.17	Suggested Policy: Continue to support the goals of no net loss of wetland functions and values in the face of climate change. Acquisition, enhancement, regulations, and incentive programs shall be used independently or in combination with one another to protect and enhance wetlands functions and values.	We suggest this addition in anticipation for drier environmental conditions. Wetland ecological values and functions are extremely important in combating climate related stressors. Some benefits include the attenuation, impoundment, and recharge of water sources.
Climate Change and Resiliency New Policy, Goal 9.15	Suggested Policy: Policy 9.15-1 In areas subject to coastal flooding, increase resilience and reduce risk through: (6) Prohibit new development within shoreline areas that would require hard-armoring infrastructure, taking into consideration future climate change factors such as sea-level rise	Climate change related factors increase storm frequency and intensity, king tides, wind driven waves, and sea level rise, which should all be considered when siting development along shorelines. Installing new hard armoring should be avoided (Senate Bill 5273 , WAC 173-26-231). A resource that should be considered in this policy section is the Shore Friendly Program in King County , which provides funding opportunities and guidance for homeowners looking to protect their shorelines from erosion. This policy section may also need to specify the requirements to perform an

	and an increase in storm surge capacity and frequency.	alternatives analysis for all shoreline protection projects (WAC 220-660-370).
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We appreciate the efforts Burien is undertaking to protect and improve habitat and ecosystem conditions throughout their jurisdiction during this Periodic Update process. We look forward to continuing to work with you during the review and implementation of the city's updated Comprehensive Plan and Critical Areas Ordinance.

If you have any questions, please call me at (206)-707-5434.

Sincerely,

Morgan Krueger
Regional Land Use Planner, WDFW Region 4

CC:

Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)

Marian Berejikian, Environmental Planner (Marian.Berejikian@dfw.wa.gov)

Stewart Reinbold, Assistant Regional Habitat Program Manager (Stewart.Reinbold@dfw.wa.gov)

Julian Douglas, Habitat Biologist (Julian.Douglas@dfw.wa.gov)

Region 4 Southern District Planning Inbox, R4SPlanning@dfw.wa.gov

Keri Sallee, Washington Department of Commerce (keri.sallee@commerce.wa.gov)



Management of Mobility Division
2901 3rd Avenue, Suite 500
Seattle, WA 98121-3014
206-464-1211 / FAX: 206-464-1189
TTY: 1-800-833-6388
www.wsdot.wa.gov

March 11, 2024

400 SW 152nd St
Suite 300
Burien, WA 98166

Dear Mr. Hunt,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the City of Burien's draft 2024 Comprehensive Plan and the accompanying draft Environmental Impact Statement (EIS) and project list. WSDOT offers the following comments in support of the city's planning efforts.

EIS Alternatives

WSDOT recognizes the importance of coordinated land use and transportation strategies to effectively manage demand and provide travel options for Puget Sound residents. We are pleased to see that the city is evaluating several alternatives. We are particularly interested in the city's Alternative 3 because it promotes a land use pattern that provides for greater housing and employment opportunities within the city of Burien and within walking distance to regional transit. It is WSDOT's belief that such a policy advances our shared goal of providing the public with a safe, sustainable and integrated multimodal transportation system that meet the travel challenges of today and the growing demands of tomorrow.

Page 22 of the draft EIS notes that Alternative 3 is the only one which accommodates projected employment growth, with the other alternatives falling short. WSDOT appreciates the city's attention to detail in this matter. Jobs/housing balance is a key land use goal, and addressing mismatch in capacity and need to accommodate growth is a key step toward achieving it.

Comprehensive Plan

WSDOT appreciates the city's consideration of all travel modes in its transportation element. Promoting alternatives to single occupancy vehicle travel reduces demand on the transportation system and helps the city and the state achieve our shared goals of VMT and greenhouse gas reduction. The inclusive public outreach conducted by the city to generate the city's transportation priorities is also invaluable for both the city and WSDOT's Complete Streets efforts to build a complete bike and pedestrian network across city and state facilities. As projects move forward, WSDOT encourages the city to design its facilities—where appropriate—in keeping with state standards, specifically to a Level of Traffic Stress (LTS) 2 or better. For more information, see the WSDOT design manual, specifically [Chapters 1510 – Pedestrian Facilities](#), [1515 – Shared-Use Paths](#), and [1520 – Bicycle Facilities](#).

In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. The bill directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. More information, including staff contacts, can be found on WSDOT's [Complete Streets](#) webpage.

WSDOT encourages local agencies to use their comprehensive plans as an opportunity to conduct inclusive community outreach and identify locations where state facilities present a barrier to nonmotorized connectivity. This includes highways like State Route 509 and State Route 518 in Burien. WSDOT encourages the City of

Burien to consider how these facilities might fit into its broader active transportation network and overall multimodal investment goals.

WSDOT Planning Resources

WSDOT's comprehensive planning resources for local agencies can be found on our [Land Use and Transportation Guidance](#) page. This includes a wealth of information on how WSDOT reviews local agency plans, our land use and transportation goals, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance.

WSDOT's [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

Further Engagement & Coordination

WSDOT appreciates being included in the City of Burien's planning process. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your work updating your plans.

Thank you again for the opportunity to review the Burien 2024 Comprehensive Plan. We look forward to our continuing productive partnership.

Sincerely,

Jeff Storrar, Policy Manager
WSDOT's Management of Mobility Division

CC:

Matthew Kenna, WSDOT
Zack Howard, WSDOT
April Delchamps, WSDOT



Puget Sound Regional Council

Letter 3

1201 Third Avenue, Suite 500 Seattle, WA 98101-3055 | psrc.org | 206-464-7090

February 27, 2024

Jeffrey Watson, Interim Community Development Director
City of Burien
400 SW 152nd Street
Burien, WA 98166

Subject: PSRC Comments on City of Burien Draft Comprehensive Plan

Dear Mr. Watson,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Burien draft comprehensive plan. We appreciate that the city has invested a substantial amount of time and effort in developing the draft plan and appreciate the chance to review while in draft form. This timely collaboration provides an opportunity to review plan elements for the 2024 comprehensive plan and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

We suggest the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act. Overall, we found few things to comment on. Importantly, though, we encourage the city to work towards a final draft that uses land use assumptions and capacity figures that are consistent with the city's adopted growth targets and to update the Burien Urban Center Subarea Plan to reflect the updated targets and [PSRC's regional centers framework](#). We will look forward to continuing to work with you as you prepare the transportation master plan.

We reviewed the draft plan using the PSRC Plan Review Consistency Tool. Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right:

Plan Review Consistency Tool	PSRC Comment on Burien's Draft Plan
Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy) Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)	The final land use assumptions should be consistent with countywide growth targets and zoned capacity must be sufficient to accommodate targets. Alternatives 1 and 2, as stated in the DSEIS, do not provide consistent land use assumptions or adequate zoned development capacity for accommodating employment growth targets.
Include a statement about how the plan relates to countywide planning policies, VISION 2050, and planning requirements of the Growth Management Act.	While the city acknowledges the Growth Management Act and refers to the countywide planning policies and VISION 2050 in the Housing Element, the city should include additional discussion of how the full plan is consistent with VISION 2050 and the countywide planning policies.
Identify open space, trail, and park resources and needs, and develop programs for protecting and enhancing these areas (MPP-En-11-12, En-15, En Action-4)	Forthcoming Parks, Recreation, and Open Space Element should identify open space, trails, and park resources and needs, and develop programs for these areas.
Address rising sea water rise by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain (MPP-CC-10)	The city should consider siting and planning for essential public services away from the flood plain, if applicable. King County's iMap tool provides further information on the 500-year flood plain.

Plan Review Consistency Tool	PSRC Comment on Burien's Draft Plan
Preserve historic, visual, and cultural resources and consider potential impacts to culturally significant sites and tribal treaty fishing, hunting, and gathering grounds (MPP-DP-8)	The city should describe and include policies on tribal treaty rights. PSRC's Coordination with Tribes resource provides more information on this topic.
Various Transportation Requirements See PSRC Transportation Element Guidance	Many of the requirements for the transportation element will be included in the forthcoming Transportation Master Plan. PSRC staff will review a draft of this plan for consistency when available and the plan should be fully incorporated by reference as part of the comprehensive plan.
Jurisdictions with regional centers. Support the update of regional center subarea plans to be consistent with revised Center Plan Tools (DP-Action-8)	Please review and update the Urban Center Subarea Plan as needed to ensure consistency with the Regional Growth Center Consistency Tool . In 2025 PSRC will be monitoring individual centers and looking for consistency with VISION 2050.
Include growth targets for designated regional growth centers and manufacturing/industrial centers (MPP-RGS-2)	Once the city determines land use assumptions, the urban center subarea plan should be updated with growth targets consistent with regional center guidelines.

PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the adoption process. If you have any questions or need additional information, please contact me at mmoore@psrc.org or 206-464-6171.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maggie Moore', with a long horizontal flourish extending to the right.

Maggie Moore, Growth Management
Puget Sound Regional Council

cc: Review Team, Growth Management Services, Department of Commerce

From: Markwell, Thi <tmarkwell@kingcounty.gov>
Sent: Wednesday, January 24, 2024 4:48 PM
To: Alex Hunt
Subject: Fw: Draft Environmental Impact Statement-Burien 2044 Comprehensive Plan Update
Attachments: Comp Plan Notice of Avail DEIS_2023_Signed_01-05-2024.pdf

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Hi Alex,

King County Metro has received your draft plan update dated January 10, 2024 and has the following comment/request from our Park and Ride group:

Question: On pg 3-198, how was mode share changes determined for the alternatives? Are the changes just based on anticipated population/employment growth in the area with building out of planned mode infrastructure that would benefit transit/active transportation?

From a connecting to transit/active transportation standpoint, it sounds like all alternatives will plan for some kind of ped/bike improvements. The EIS does mention that Alternatives 2 and 3 would require revisiting the bicycle and pedestrian parts of the Transportation Master Plan to accommodate the greater projected growth from those 2 options, which I'm interpreting as potentially more improvements being planned for. So my group would lean toward Alts 2/3 with no strong preference toward either, although 2's focus on neighborhood development could close more access gaps than a focus on downtown.

=====

Thank you and have a great day.



Thi Markwell (She/Her)
Transit Environmental Planner II
Transit Real Estate and Environmental (TREE)
P 206-263-2659
tmarkwell@kingcounty.gov



From: Chung, Lawrence <lchung@kingcounty.gov>
Sent: Friday, January 12, 2024 9:13 AM
To: Markwell, Thi <tmarkwell@kingcounty.gov>
Subject: OAP: Draft Environmental Impact Statement-Burien 2044 Comprehensive Plan Update

From: Greene, John <jgreene@kingcounty.gov>
Sent: Friday, January 12, 2024 8:11 AM
To: Chung, Lawrence <lachung@kingcounty.gov>
Subject: FW: Draft Environmental Impact Statement-Burien 2044 Comprehensive Plan Update

From: McClellan, Tessa <tmcclellan@kingcounty.gov>
Sent: Thursday, January 11, 2024 5:20 PM
To: Greene, John <jgreene@kingcounty.gov>
Cc: Alex Hunt <AlexH@burienwa.gov>
Subject: FW: Draft Environmental Impact Statement-Burien 2044 Comprehensive Plan Update

Hi,
Thanks. I'm not the correct contact but I'm forwarding to John Greene in case he is.

Thanks,
Tessa

From: Alex Hunt <AlexH@burienwa.gov>
Sent: Wednesday, January 10, 2024 4:42 PM
To: McClellan, Tessa <tmcclellan@kingcounty.gov>
Subject: FW: Draft Environmental Impact Statement-Burien 2044 Comprehensive Plan Update

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Hi Tessa,

See the below email on the publication of Burien's draft Comprehensive Plan and Draft EIS. Please let me know if you are not the correct contact at King County Metro to receive SEPA notices.

Thanks and have a great day,

Alex Hunt (he/him)
Senior Planner

City of Burien
(206) 439-3152 office
AlexH@burienwa.gov
Burienwa.gov

From: Alex Hunt
Sent: Wednesday, January 10, 2024 9:58 AM
To: DL - SEPA Public Notice <SEPAPublicNotice@burienwa.gov>; Bonnie Shorin - NOAA Federal <bonnie.shorin@noaa.gov>; samantha.m.stanford@usace.army.mil; chu.rebecca@epa.gov; brian.sturdivant@hud.gov; info@psp.wa.gov; darin.klein@doc1.wa.gov; Growth Management Services Review Team SEPA <reviewteam@commerce.wa.gov>; Dept. of Ecology SEPA <SEPAregister@ecy.wa.gov>; larry.covey@dshs.wa.gov; sepa.reviewteam@doh.wa.gov; Douglas, Julian K (DFW) <Julian.Douglas@dfw.wa.gov>

Cc: Jeffrey Watson <JeffreyW@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>
Subject: Draft Environmental Impact Statement-Burien 2044 Comprehensive Plan Update

Hello,

Please see the attached SEPA Notice of Availability of Draft Environmental Impact Statement for the Burien 2044 Comprehensive Plan Update.

[The folder linked here](#) contains the following documents:

- Notice of Availability-Draft EIS
- Draft Environmental Impact Statement and Appendices
- Draft Burien 2044 Comprehensive Plan

Please feel free to contact me with any questions.

Thank you,

Alex Hunt (he/him)
Senior Planner

City of Burien
(206) 439-3152 office
AlexH@burienwa.gov
Burienwa.gov

From: Kathryn Adams-Lee
Sent: Tuesday, March 12, 2024 9:08 AM
To: Alex Hunt
Subject: FW: Burien 2044 Comprehensive Plan Update Draft EIS Comments

See below from Public Planning email

Keri Adams-Lee
Planner (she/her)

City of Burien
206-812-7575 office
206-507-2540 cell
KathrynA@burienwa.gov
burienwa.gov

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Telephone and Email Service: 9:00 a.m.-4:00 p.m. Monday-Thursday

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From: Jorgan Peadon <jorganp@wd49.org>
Sent: Monday, March 11, 2024 4:30 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Burien 2044 Comprehensive Plan Update Draft EIS Comments

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Good evening,

Water District No. 49 is still reviewing Draft EIS material provided in January. The amount of information provided from Burien is incomplete at this time to provide concrete detail about the potential ability or inability to support the three growth options.

Specifically, due to the potential zoning changes and subsequent fire flow requirement potentially changed and mandated by the Fire Marshal, Water District No. 49 cannot provide specific comment until more information is

known. The 2019 Water System Plan referenced in much of the document provided by the City of Burien was based on current zoning and flow requirements. We do not have enough information to make any educated comments currently.

Jorgan Peadon

General Manager
Water District No. 49
206.242.8535 office 206.888.7604 mbl.

jorganp@wd49.org

King County Water District No.49

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From: Amanda McIntire
Sent: Thursday, March 7, 2024 3:34 PM
To: Alex Hunt
Subject: FW: Comments on Burien 2024 Our Comprehensive Plan update
Attachments: 3-7-2024 FW Comments on Burien 2024 Comp Plan Periodic Review Affordable Housing Focus.pdf

Good Afternoon,

Please see the attached comments from Future wise on the Comp plan 😊

Best,
Amanda McIntire (she/her)
Assistant Planner

City of Burien
(206) 248-5519 Office
(206) 507-2674 City Cell
AmandaMc@burienwa.gov
Burienwa.gov

We are currently experiencing delays in permit processing. We apologize for any inconvenience and appreciate your patience as we transition to our new permit system!

Permit Counter Hours

The Permit Center provides permitting customer service in-person, over the phone, and through email.

In-person service - 9am-Noon Monday- Thursday | Telephone and Email service 9am-4pm Monday-Thursday | Closed Daily - Noon-1pm (M-Th)

No In-Person service on Fridays (including email, phone calls, and accepting payments)

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From: Tim Trohimovich <Tim@futurewise.org>
Sent: Thursday, March 7, 2024 3:06 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Comments on Burien 2024 Our Comprehensive Plan update

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Dear Staff:

Enclosed please find Futurewise's Comments on the Burien 2024 Our Comprehensive Plan update. Please contact me if you need anything else.

Thank you for considering our comments.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



Futurewise

1201 3rd Ave #2200, Seattle, WA 98101

(206) 343-0681

tim@futurewise.org

futurewise.org

connect: [!\[\]\(05be7c7a8995decd503647c99211f7c2_img.jpg\)](#) [!\[\]\(16cd6e1a39784ecf52b4db09f4865f40_img.jpg\)](#)



1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
futurewise.org

March 7, 2024

Alex Hunt, Senior Planner
City of Burien Community Development
400 SW 152nd St, Suite 300
Burien, Washington 98166

Dear Senior Planner Hunt:

Subject: Comments on the Burien 2024 Our Comprehensive Plan update Jan. 2024
Sent via email to: planning@burienwa.gov

Thank you for the opportunity to comment on the *Burien 2024 Our Comprehensive Plan* update. The updates represent a significant opportunity to improve comprehensive plans and development regulations for housing and affordable housing. Overall, we support the comprehensive plan update. We discuss certain Growth Management Act (GMA) requirements below.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, that protect our most valuable farmlands, forests, and water resources, and encourage growth in urban growth areas to prevent poorly planned sprawl. Futurewise has members across Washington State including the City of Burien.

RCW 36.70A.070(2)(c) requires Burien's housing element to identify "sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing" The State of Washington Department of Commerce has documented that low- and mid-rise wood frame housing types are needed to provide housing affordable to families and individuals with incomes between 0 to 80 percent of the adjusted median income when subsidies are available.¹ These housing types also

¹ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Feb. 7, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d5l7g509r389fomjpowh8isjpirlh> and at link on the last page of this letter with the filename: "HB 1220_Book2_Housing Element Update_230823 Final_updated 231031.pdf."

provide housing affordable to families and individuals earning between 80 to 120 percent of the adjusted median income without subsidies.² With subsidies, high-rise buildings are also affordable to families and individuals earning between 80 to 120 percent of the of the adjusted median income.³ Accessory dwelling units on existing lots can also provide housing for families and individuals earning 80 to 120 percent of the adjusted medium income in higher cost communities.⁴

In identifying “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing ...,” Burien must take into account its comprehensive plan and development regulations. The analysis must also take into account that low- and mid-rise wood frame housing types are needed to provide both subsidized affordable housing and to meet the market demand for these housing types and their rents.⁵ Note that RCW 36.70A.070(2)(c) requires “sufficient capacity of land” for both affordable and market rate housing including market rate multifamily housing.

We support that the land use element and the housing element identifies housing capacity for the comprehensive plan designations and recognizes the need to take into the account that the certain densities are affordable and others are not.⁶ It would be helpful if the methodology, supportive data, and locations were included in an appendix or technical report. If this has already been done, please let me know.

We also appreciate that the comprehensive plan update frankly states that the current comprehensive plan does not have the capacity to allow constructed of the needed housing units.⁷ We also appreciate that the two alternatives in the comprehensive plan are shown as having sufficient capacity for affordable housing and market rate housing “provided densities are optimal for the designations based on market potential and not at minimum levels.”⁸

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Burien 2024 Our Comprehensive Plan* pp. 2-18 – 2-19, 4-13 – 4-14 (Jan. 2024).

⁷ *Id.* p. 4-14.

⁸ *Id.* pp. 2-18 – 2-19, p. 4-14.

Re: Comments on the *Burien 2024 Our Comprehensive Plan* update Jan. 2024
March 7, 2024
Page 3

The comprehensive plan and development regulations must include policies and regulations that make these optimal densities likely to be constructed.⁹ For example, the Commercial/Mixed Use comprehensive plan designation on page 2-15 asks if this designation should include a minimum density. The *2021 King County Countywide Planning Policies* in Table H-3, Suggested Strategies for Achieving Policy Goals, suggests Countywide Planning Policy H-16 should be met by requiring minimum densities near transit station areas and transit corridors served by high-capacity or frequent transit.¹⁰ Alternative 2 proposes to designate the Burien Transit Center and other transit stops Commercial/Mixed Use.¹¹ We agree with the Countywide Planning Policies that minimum density requirements are an effective way to achieve transit supportive and affordable densities. We recommend that the Commercial/Mixed Use comprehensive plan designation and similar designations applied within a half-mile of the Burien Transit Center and other transit stops include minimum density requirements at transit supportive and affordable densities.¹²

It is unclear how the capacity for emergency housing, emergency shelters, and permanent supportive housing was identified as required by RCW 36.70A.070(2)(c). The methodology, supportive data, and locations should be included in an appendix or technical report. If this has already been done, please let me know.

Thank you for considering our comments. If you require additional information, please contact me at email tim@futurewise.org.

⁹ *Kittitas Cty. v. Eastern Washington Growth Management Hearings Bd.*, 172 Wn.2d 144, 164, 256 P.3d 1193, 1203 (2011) citing RCW 36.70A.130(1) accord RCW 36.70A.290(2) development regulations must comply with the Growth Management Act (GMA).

¹⁰ *2021 King County Countywide Planning Policies* (Amended Aug. 15, 2023 [Ordinance 19660] Ratified Nov. 30, 2023) Appendix 4: Housing Technical Appendix pp. 93 – 94 last accessed on Feb. 7, 2024, at: https://cdn.kingcounty.gov/-/media/king-county/depts/executive/performance-strategy-budget/regional-planning/cpps/kc_2021_cpps_ord_19660_113021.pdf?rev=dc68c4a4ea67465c8c79deo869fcb867&hash=A3EB1Bo5E22148F999802Fo18Fo827B3 and at the link on the last page of this letter with the filename: “KC_2021_CPPs_Ord_19660_113021.pdf.”

¹¹ *Burien 2024 Our Comprehensive Plan* p. 2-12 (Jan. 2024).

¹² Futurewise | GGLO | Transportation Choices Coalition, *Transit-oriented communities: A Blueprint for Washington State* p. 51 (Oct. 2009) last accessed on Feb. 27, 2024, at: <http://www.reconnectingamerica.org/assets/Uploads/tccblueprintfortoc2009.pdf> and at the link on the last page of this letter with the filename: “tccblueprintfortoc2009.pdf;” Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023).

Re: Comments on the *Burien 2024 Our Comprehensive Plan* update Jan. 2024
March 7, 2024
Page 4

Very Truly Yours,



Tim Trohimovich
Director of Planning & Law

Enclosures

The enclosures are at the following link:

https://futurewiseorg-my.sharepoint.com/:f/g/personal/tim_futurewise_org/EoYlfHwhtsZIkVIW8uFfFEBA_HoYcO76ndCtndc412rZg?e=v4TMle

From: William Millhollin <william@nwpermit.com>
Sent: Friday, January 12, 2024 8:28 AM
To: Public - Planning
Cc: Alex Hunt
Subject: Draft 2044 Comprehensive Plan - Feedback

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Hello Alex,

I am excited to continue reviewing the draft plan in more detail, but I do have one major comment that I would like to submit at this time. This is an item I have been toiling over for a few years and believe this is the best time to suggest it.

I can only imagine how much work has gone into this draft plan so far, and I am just one individual bringing one perspective, but I really hope that the density gap I outline below between Single-Family Zones and Multi-Family Zones can be bridged here.

Comment

The inclusion of ADU regulation for Detached SFRs in Single-Family Zones in effect since 2007 has provided higher density living opportunities than that of Low or even some Medium density Multi-Family Zoned properties. On average the lot size required of a Single-Family Zoned lot in Burien is about 8,000sf or 0.1837ac (rough estimate based on [current Zoning map](#)). With this, a Single-Family Zoned lot may construct 1 Primary Residence as well as 2 Accessory Dwelling units, in effect 3 dwelling units; This would equate to 5du/ac. However, the code provides an exception to allow Primary Residential units to be constructed on substandard lot sizes and there are no minimum lot size requirements observed when establishing those 2 additional Accessory Dwelling Units ([BMC 19.17.070](#)). **In effect ADU regulations have increased density within Single-Family Zones to a 16du/ac (avg) equivalent within the Single-Family Zone as a whole.** This is in excess of the Low density Multi-Family Zone RM-12 (12du/ac) ([BMC 19.15.010](#)), which has no exceptions for minimum number of units allowed and where Single-Family does in essence (3du/lot). The RM-12 Zone requires a minimum lot size of 10,800sf ([BMC 19.15.010](#)), in order to achieve the same number of units as any given lot in the Single-Family Zone. At its highest disparity, a Single-Family Zoned lot could reasonably construct 1 Primary Residence with 2 attached Accessory Dwelling units on a lot as small as 5,000sf or nearly 9du/ac or 26du/ac for that Single-Family Zone. This is in excess of even the highest density Multi-Family Zone allowed within the city, ([BMC 19.15.010](#)).

Given that a lot as small as 5,000sf in the Single-Family Zone is provided means to accommodate 3 dwelling units, I would like to suggest that additional opportunities should be made for Multi-Family Zones. I would like to suggest that, similar to Single-Family Zones, a minimum number of units should be allowed within the Multi-Family Zone regardless of lot but where all development on the subject site can meet those other requirements outlined within [BMC Chapter 19](#). **I would like to suggest that 4 dwelling units should be the minimum allowance within the RM-12 Zone (Low-Med Density), regardless of lot**

size. All other exceptions, exemptions and provisions for increased density within the Zone should remain such as [Lot Averaging](#) to continue providing compatibility for sites with unique situations.

Additionally, for those residential Multi-Family Zoned lots within the newly adopted [Burien Urban Center Plan](#), additional units above the 4/du minimum should be offered, regardless of lot size, but with features that go beyond the code standards to achieve the goals outlined within the Urban Center Plan such as Affordable Housing, Landscaping, Cultural and Artistic initiatives.

I believe this will bridge the gap in residential densities and cause more redevelopment within the Multi-Family Zone that is consistent with the goals and objectives of growth outlined within the draft [Burien 2044 Draft Comprehensive Plan](#). This approach will encourage growth within the areas designed for increased density rather than within those areas of even lower density.

PS: Notable development standards should be evaluated such as Maximum Lot Coverage in order to reasonably effect the suggested changes above.

I am more than happy and willing to provide examples and additional reference materials should this comment invoke further discussion.

Thank you very much for your time and consideration in reading this comment.

Have a great day

--

William Millhollin
President - Direct: (206) 601-7043 - william@nwpermit.com

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www.nwpermit.com

From: William Millhollin <william@nwpermit.com>
Sent: Wednesday, January 24, 2024 8:06 PM
To: Alex Hunt
Subject: Re: Draft 2044 Comprehensive Plan - Feedback
Attachments: Email - Public Comment - Draft 2044 Comprehensive Plan.pdf

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Hello Alex,

I am hoping to submit some supplemental comments related to my original comment after attending the Planning Commission meeting last night.

I attended the Planning Commission community meeting last night 01/24/2024 and sincerely appreciate the materials prepared and the presentation as a whole! Related to my original comment, attached here for reference, I wanted to comment specifically regarding "Middle-Housing" requirements issued by the state in 2 parts. I believe that Middle-Housing further conflates the discrepancy around neighborhood hubs (alt.2) and a downtown core (alt.3), which are the intended outcome of the current Comprehensive Plan Draft, and that affordability still may not be achieved.

Part 1 - Density Deflation

Middle-Housing, although state mandated, would drain investment to the downtown core, urban center and any neighborhood hubs proposed. I believe that middle-housing should be made more sparse and focused around neighborhood hubs. As demonstrated in my original comment, roughly 35% to 116% more square footage in a Multi-Family zoned lot is required to achieve the same number of dwelling units as is currently afforded in the Single-Family Zone. The inclusion of Middle-House will pull development further away from the Multi-Family and Mixed-Use zoned properties for much easier development opportunities in the Single-Family Zoned areas (Low Density 1). The Return-On-Investment (ROI) and Time Horizon for profitability is MUCH better developing a Triplex or Fourplex in a residential zone than it would be having to "jump through all the hoops" of multi-family and mixed-use developments such as dedication of land to public, greenspace retention, affordability requirements, bonding, capital improvements, etc. In addition to limiting Middle-Housing to the extent possible, it may be worth considering an appeal to delay adoption of middle-housing so that Downtown Centers may recover, be developed and redeveloped.

- Note, it is worth acknowledging the exodus of downtown cores nationwide by the effects of COVID and work-from-home.
- Note, illegal condoization actions have been in use for some time. (In short, Single-Family homes with ADUs have already been converted into Condos after construction permits get finalized via assessor and county processes)
- Note, it's worth acknowledging the significant increase to municipal investment in order to spread dwelling density across a larger region, rather than condensing dwelling units into a central downtown. Improvements for sewer, water, power, mobility, traffic, etc. are

examples of those infrastructures which would need significantly more investment in order to span density across the entirety of city limits.

Part 2 - Affordability Avoidance

As one of the commissioners stated last night, planning provides the opportunity but it's up to the community to make use of it.

In my experience working with developers, they have and will continue to take the path of least resistance. Based on the descriptions provided in [House Bill #1110](#) (Screenshot Below) I can say with high certainty that most will opt for constructing 3 larger dwelling units and avoid affordability requirements. Maybe there is straight forward regulation that can be adopted for affordability, but without incentive most won't want the additional work and cost. This gap might be more easily bridged by the city adopting "Standard Plans", similar to what Seattle has done with [DADU Standard Plans](#), that could very affordably be purchased for re-use. A "Standard Plan" is a set of construction drawings that are already pre-approved for Building Code and that only really need review for Zoning requirements. Another incentive might be a priority review category where permits that include affordability have a faster review turnaround.

- Note, it is worth acknowledging that 2021 Energy Codes are preliminarily expected to increase construction costs by 20-30% which would also further diminish desires for constructing affordable housing.
 - It may be worth considering an affordability fee rate that does not exceed a certain percentage of construction cost, or, not to exceed an average cost per square foot of average real estate market rates.

Table 1: Basic requirements for cities subject to the middle housing bill in the 2024-2027 periodic update.

	CITY LIMITS: Number of middle housing units that must be allowed per lot within city limits	NEAR A MAJOR TRANSIT STOP: Number of middle housing units per lot that must be allowed within ¼ mile of transit	WITH AFFORDABLE HOUSING: Number of middle housing units that must be allowed within city limits if affordable units provided Sec. 3(2)(a)
TIER ONE: Cities with population of at least 75,000 HB 1110, Sec. 3(1)(b)	4 du/lot on all lots zoned predominantly residential, unless zoning permits higher densities	6 du/lot within 1/4 mile walking distance of a major transit stop, unless zoning permits higher densities	6 du/lot if 2 are affordable, unless zoning permits higher densities
TIER TWO: Cities with population between 25,000 and 75,000 HB 1110, Sec. 3(1)(a)	2 du/lot on all lots zoned predominantly residential, unless zoning permits higher densities	4 du/lot within 1/4 mile walking distance of a major transit stop, unless zoning permits higher densities	4 du/lot on all lots predominantly residential if one is affordable
TIER THREE: Cities with population under 25,000 that are contiguous with the UGA of the largest city in a county with a population over 275,000 HB 1110, Sec. 3(1)(c)	2 du/lot on all lots zoned predominantly residential, unless zoning permits higher densities		

Thank you very much as always for your time and consideration.

On Mon, Jan 22, 2024 at 9:04 AM Alex Hunt <AlexH@burienwa.gov> wrote:

Hi William,

Yes, we can forward your comment to the Planning Commission. It will also be included in the meeting minutes for the January 24, 2024 meeting.

Thanks,

Alex Hunt (he/him)
Senior Planner

City of Burien
(206) 439-3152 office
AlexH@burienwa.gov
Burienwa.gov

From: William Millhollin <william@nwpermit.com>
Sent: Friday, January 19, 2024 2:56 PM
To: Alex Hunt <AlexH@burienwa.gov>
Subject: Re: Draft 2044 Comprehensive Plan - Feedback

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Hello Alex,

Thank you very much!

Could you accept my original comment for the upcoming meeting as well, or should I submit it under a different email title?

On Fri, Jan 19, 2024 at 2:05 PM Alex Hunt <AlexH@burienwa.gov> wrote:

Hi William,

The Planning Commission will be hosting the [Burien 2044 Advisory Committee meeting](#) next Wednesday January 24 starting at 5:30 p.m. There will be an opportunity for public comment during that meeting.

Best,

Alex Hunt (he/him)
Senior Planner

City of Burien
(206) 439-3152 office
AlexH@burienwa.gov
Burienwa.gov

From: William Millhollin <william@nwpermit.com>
Sent: Friday, January 19, 2024 9:44 AM
To: Alex Hunt <AlexH@burienwa.gov>
Subject: Re: Draft 2044 Comprehensive Plan - Feedback

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Hello Alex,

Thank you very much.

Are there any other upcoming forums where I might highlight this comment before the Final EIS or draft Comprehensive Plan such as a town hall meeting or roundtable discussion?

On Thu, Jan 18, 2024 at 2:58 PM Alex Hunt <AlexH@burienwa.gov> wrote:

Hello William,

Thank you for your comments. Your comments will be addressed with the Final EIS and next draft of the Comprehensive Plan.

Have a great day,

Alex Hunt (he/him)
Senior Planner

City of Burien
(206) 439-3152 office
AlexH@burienwa.gov
Burienwa.gov

From: William Millhollin <william@nwpermit.com>
Sent: Friday, January 12, 2024 8:28 AM
To: Public - Planning <planning@burienwa.gov>
Cc: Alex Hunt <AlexH@burienwa.gov>
Subject: Draft 2044 Comprehensive Plan - Feedback

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Hello Alex,

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Comment

The inclusion of ADU regulation for Detached SFRs in Single-Family Zones in effect since 2007 has provided higher density living opportunities than that of Low or even some Medium density Multi-Family Zoned properties. On average the lot size required of a Single-Family Zoned lot in Burien is about 8,000sf or 0.1837ac (rough estimate based on [current Zoning map](#)). With this, a Single-Family Zoned lot may construct 1 Primary Residence as well as 2 Accessory Dwelling units, in effect 3 dwelling units; This would equate to 5du/ac. However, the code provides an exception to allow Primary Residential units to be constructed on substandard lot sizes and there are no minimum lot size requirements observed when establishing those 2 additional Accessory Dwelling Units ([BMC 19.17.070](#)). **In effect ADU regulations have increased density within Single-Family Zones to a 16du/ac (avg) equivalent within the Single-Family Zone as a whole.** This is in excess of the Low density Multi-Family Zone RM-12 (12du/ac) ([BMC 19.15.010](#)), which has no exceptions for minimum number of units allowed and where Single-Family does in essence (3du/lot). The RM-12 Zone requires a minimum lot size of 10,800sf ([BMC 19.15.010](#)), in order to achieve the same number of units as any given lot in the Single-Family Zone. At its highest disparity, a Single-Family Zoned lot could reasonably construct 1 Primary Residence with 2 attached Accessory Dwelling units on a lot as small as 5,000sf or nearly 9du/ac or 26du/ac for that Single-Family Zone. This is in excess of even the highest density Multi-Family Zone allowed within the city, ([BMC 19.15.010](#)).

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PS: Notable development standards should be evaluated such as Maximum Lot Coverage in order to reasonably effect the suggested changes above.

I am more than happy and willing to provide examples and additional reference materials should this comment invoke further discussion.

Thank you very much for your time and consideration in reading this comment.

Have a great day

--

William Millhollin
President - Direct: (206) 601-7043 - william@nwpermit.com

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William M <nwpwill@gmail.com>

Draft 2044 Comprehensive Plan - Feedback

William Millhollin <william@nwpermit.com>

Fri, Jan 12, 2024 at 8:27 AM

To: planning@burienwa.gov

Cc: Alex Hunt <alexh@burienwa.gov>

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Have a great day

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President - Direct: (206) 601-7043 - william@nwpermit.com

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www.nwpermit.com

From: Chris Craig
Sent: Friday, March 1, 2024 2:05 PM
To: Alex Hunt; Jeffrey Watson
Subject: FW: Comp Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jeff and Alex,

The Mayor asked to meet with some of our large/significant land owners in Burien, and one of the topics of discussion was ways to remove barriers to new development. One of the property owners followed up after the meeting with some additional thoughts on how we can incentivize development and avoid unintended negative consequences. I thought I would share as the comp plan process moves forward as I think it has a lot of great perspective from an experienced property developer about how policies may play out specifically in Burien....

Thanks,

Chris Craig
Economic Development Manager

City of Burien
(206) 276-6396 cell
Chrisc@burienwa.gov
ChooseBurien.com

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From: Jeff Rakow <jeff@snowballinv.com>
Sent: Friday, March 1, 2024 9:30 AM
To: Chris Craig <chrisc@burienwa.gov>
Subject: RE: Comp Plan

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Craig,

A few thoughts:

- **Density:** My last email suggested that any developer would always prefer the optionality of higher density (even if not economic to fully exploit it). As I have thought about it the last couple days, I remembered the case study of Lynnwood: they re-zoned for high-rise around the light rail station, which caused land owners to hold out for higher land values, but because high-rise construction was not economically feasible, the policy had the perverse impact of stunting new development of mid-rise (and thus all) development. In other words, there may be a trade-off between higher density zoning and more immediate development. A

counter-example would be Tukwila where a high-rise actually got built, but I fear it is the exception that proves the rule. Anyway, something to consider.

- **Parking:** Given the walkable nature of downtown and the access to public transit, providing as much flexibility as possible for downtown parking requirements would be a huge benefit to encourage development. It's very striking what an outsize impact parking can have on both the design and cost of apartment projects.
- **Retail:** Seattle is an interesting case study where retail has improved the ground plane, BUT, led to an over-supply of retail. Every new apartment building competes for the hip new coffee shop (or other similar use); as a result, retailers proliferate but many do not make it. The result is that developers (and importantly, lenders) perceive retail as risky. In a market like Burien that already has heavy retail, requiring retail on the ground floor can set up a project to fail (I am curious how the retail at Maverick and Merrill Gardens has done). Using our site as an example, if I were the city, I would likely require retail on 152nd, but as a developer, I would be very skeptical of retail on 5th and 150th and would underwrite substantial vacancy, which would be a drag on feasibility. Limiting retail requirements would be a meaningful inducement to developers to encourage development.
- **Affordable housing:** Many municipalities (e.g., Redmond, Bellevue, Kirkland) are using comp plans / upzones as an opportunity to transfer the cost of favored policy initiatives to developers, affordable housing being the most prominent example. In a market like Burien where the economics for new development are on the knife's edge of feasibility, incremental costs that fund other priorities can be a deal killer for projects. This is particularly ironic in relation to affordable housing where increasing supply should be a key policy goal. Burien has not taken the same tack as other cities, but I would caution against the path that Seattle and others have taken.
- **Street grid connections:** I am not sure that street grid connections are a general issue in Burien, but I bring it up selfishly because I have heard rumblings that we may have requirements to re-connect 151st. Obviously, these limitations make a huge difference on any project and maximum flexibility could be quite important.

I am not sure what the right path is to provide feedback in the comp plan process (or if it is already mostly baked at this point), but feel free to share my comments above as you see fit or let me know if/how I might share them most effectively.

Thanks,
Jeff

From: Chris Craig <chrisc@burienwa.gov>
Sent: Thursday, February 29, 2024 3:03 PM
To: Jeff Rakow <jeff@snowballinv.com>
Subject: RE: Comp Plan

Thank you so much Jeff for this information, and thank you for meeting with the Mayor to share your perspectives.

Is there any other flexibility in development (other than density/height) that you would expect a high appetite for from developers? If there are development obstacles or regulations from the City's side that may be a roadblock for incentivizing development, we want to take a hard look at how we can mitigate those.

Thanks again,

Chris Craig
Economic Development Manager

City of Burien
(206) 276-6396 cell
Chrisc@burienwa.gov
ChooseBurien.com

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From: Jeff Rakow <jeff@snowballinv.com>
Sent: Tuesday, February 27, 2024 2:03 PM
To: Chris Craig <chrisc@burienwa.gov>
Subject: FW: Comp Plan

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Chris,

Good to see you last week. After my meeting with the mayor last week, I sent him the note below on the comprehensive plan. I am not sure what the best way is to provide feedback, but wanted to share my comment below with you too.

Regards,
Jeff

From: Jeff Rakow
Sent: Tuesday, February 27, 2024 1:41 PM
To: kevins@burienwa.gov
Subject: Comp Plan

Kevin,

Good to see you last week and I appreciated the conversation around development in downtown Burien. Based on our conversation, I took a look at the proposed comprehensive plan. The 2 different zoning options posed in the document were interesting to review, in particular the use of a Downtown Urban Center zone. As I suggested to you when we met, most developers today will not fully benefit from the additional density associated with high rise construction. That said, I do find the higher density an intriguing option to future proof your zoning and attract interest given that we do not what the development landscape will look like down the road. As I suggested in our meeting, flexibility is ultimately very useful for developers trying to make projects work and the flexibility on density is a great addition the toolkit.

I look forward to further conversation about how we can work towards achieving a vibrant downtown Burien!

Jeff

Jeff Rakow

SNOWBALL
INVESTMENT

232 7th Ave N, Suite 100

Seattle, WA 98109
jeff@snowballinv.com
(206) 551-6752

From: Ashleigh-Nicole Williams
Sent: Monday, March 11, 2024 8:14 AM
To: Alex Hunt
Subject: FW: Comment for commission meeting

Ashleigh Williams
Planner

City of Burien

(206) 248-5508 office

AshleighW@Burienwa.gov

Burienwa.gov

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From: Cori Allan, Realtor <coriallan@kw.com>
Sent: Sunday, March 10, 2024 3:08 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Comment for commission meeting

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Dear Senior Planner Alex Hunt,

I am writing to comment on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

I live on SW 132nd St. My neighbors made many public comments at planning commission meetings in 2023 explaining that large, mid-rise buildings are not appropriate for this area. I agree with what my neighbors have said in these public comments. Buildings larger than 3-4 stories should not be allowed in this area of currently single-story homes near a very busy elementary school.

I am disappointed to see that the Draft Burien 2044 Comprehensive Plan shows buildings taller than 3-4 stories allowed in this area. **Please change the recommended building heights to align with the map that was presented in the planning commission meeting on June 14 2023.** On this map, SW 132nd St was designated as a maximum height of 3-4 stories. The city of Burien does not have the infrastructure to support the amount of people this would bring to the city.

The planning commission has been touting this plan as a way to address "middle housing" as a licensed professional who has done more than 30 real estate transactions, who sits on the associate leadership council for my real estate brokerage, who also grew up in Burien, this plan will push "middle housing" completely out of this neighborhood and bring in 700k+ units. We saw it happen in Rainer Valley and we're seeing it happen in West Seattle. If the commission truly cares about addressing middle housing then they won't choose to drive out the middle class in this neighborhood by allowing housing over 4 stories high.

I would also like to add that a 3-4 story house is already 40-66 feet tall substantially taller than anything in the neighborhood. I know that you don't live in Burien and you're just doing your job, but please take a minute to realize how this would negatively impact our community. I'm saying this as someone that would directly benefit from the rezoning to 6-7 stories. Even though I could make tens of thousands of dollars by helping people buy and sell in this neighborhood I do not think this would address the housing issues in Burien and benefit the existing community in any way.

Thank you,
Cori



Cori Allan

Realtor, MBA, se habla espanol, senior relocation and probate specialist

206.962.9148

CoriAllanhomes.com // [Facebook](#) // [Appointment](#)

From: Kathryn Adams-Lee
Sent: Monday, February 12, 2024 8:59 AM
To: DL - Public Works Dept; DL - Planning Div (CD)
Subject: FW: 8th ave sw bike and walk paths

Please see a public comment concerning bike and walk paths on 8th Ave SW that came into the Public Planning email.

Thanks,

Keri

Keri Adams-Lee
Planner (she/her)

City of Burien
206-812-7575 office
206-507-2540 cell
KathrynA@burienwa.gov
burienwa.gov

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From: Elizabeth Bailey <beffylou@msn.com>
Sent: Friday, February 9, 2024 9:22 PM
To: Public - Planning <planning@burienwa.gov>
Subject: 8th ave sw bike and walk paths

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Hi,

If 8th ave sw is made into a connector between WCenter and Burien, please consider allowing electric golf carts with a slow speed and weight restriction on vehicle size to use the laneway.

I'm just thinking of the aging population that could potentially be more mobile and out in public if they could use a golf cart in Burien.

Thanks,
Elizabeth Bailey

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Mike <mikebrungger@gmail.com>
Sent: Wednesday, January 17, 2024 9:00 PM
To: Alex Hunt
Subject: Burien Comprehensive Plan Land use alternatives

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Mr. Hunt,

I am a Burien resident and I would like to voice my favor for land use Alternative 2 or some combination of 2 & 3. I am located on 8th ave south & and s112th st, I would personally benefit from it being zoned low residential 2, which it is not present in alternative 3. I wanted to be transparent about that before voicing my opinion that alternative 2 looks like a more vibrant, more populated option across Burien, not just focused on the Urban Center where it can be more challenging to access by vehicle during busier hours. Personally I like the idea of more middle housing types to mixed commercial/residential uses. It seems like a step in the right direction for King county and Western Washington as a whole. In my work I see a lot of builders putting up large single family houses that take up the majority of a lot, that seems to make them money but doesn't help with housing unless you can afford a huge new house.

Thank you for your time and work on the plan. It seems like a huge undertaking.

I look forward to seeing what happens next,

Michael Brungger
11410 8th ave South,
Burien WA 98168

From: Ashleigh-Nicole Williams
Sent: Monday, March 11, 2024 8:07 AM
To: Alex Hunt
Subject: FW: upzoning of 132nd SW again, really?!?

Good morning Alex,

Please see the email below.

Ashleigh Williams
Planner

City of Burien

(206) 248-5508 office

AshleighW@Burienwa.gov

Burienwa.gov

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From: Kari Feeney <karifeeney@hotmail.com>
Sent: Sunday, March 10, 2024 2:45 PM
To: Public - Planning <planning@burienwa.gov>
Subject: upzoning of 132nd SW again, really?!?

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Dear Senior Planner Alex Hunt,

I am writing to comment on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

I live on SW 132nd St. My neighbors made many public comments at planning commission meetings in 2023 explaining that large, mid-rise buildings are not appropriate for this area. I agree with what my neighbors have said in these public comments. Buildings larger than 3-4 stories should not be allowed in this area of currently single-story homes near a very busy elementary school. Also, I personally have solar panels on my house and a higher building would potentially block my ability to produce sustainable energy.

I am disappointed to see that the Draft Burien 2044 Comprehensive Plan shows buildings taller than 3-4 stories allowed in this area. Please change the recommended building heights to align with the map that was presented in the planning commission meeting on June 14 2023. On this map, SW 132nd St was designated as a maximum height of 3-4 stories.

Thank you,

Kari Feeney

From: neale frothingham.info <neale@frothingham.info>
Sent: Wednesday, March 6, 2024 8:11 AM
To: Kathryn Adams-Lee
Cc: Alex Hunt
Subject: Re: 14847 8th Ave. S.

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Mr. Hunt,

You were copied on a prior e-mail from Ms. Adams to me.

I have a self-interest in density as a small multi-family property owner within Burien. I would welcome more.

That doesn't mean that the following is not true:

- Flooding the City with density, ***especially density that exceeds housing demand projections***, will devalue land zoned for residential use. E.g. Why by my property when there are 6 or 12 others that will allow the same, or greater, quantity of rentable or sellable residential units? The more sellers I have to compete against, the lower the price I can command, in the face of a specific level of demand. Planners, the City Manager, and the Council need to go big and be bold.
- Eighth Ave. S. can take probably 10 times the volume it takes now. It is close to transit (although the route to BTC is and International Station aren't particularly walkable. The retail, commercial, office development, etc. on the property across the street won't consume that capacity. There is concurrency as far as transportation goes.
- As far as sewer capacity or water capacity, IDK. WD 20 and SWSSD would need to speak to utility concurrency for more density in the area.
- A pedestrian overpass across 1st Ave. S, at 152nd, would be helpful in unlocking the walkability to transit of the residential areas east of 509.
- The project behind my property has taken for ever to take off, and is now stalled, likely due to interest rate and financing issues beyond the City or property owner's control. **The fact that it took so long to get off the ground before the rise in rates and tightening of regulatory oversight of institutions making such construction loans, speaks to how marginal the project was with existing density limits.** They need to be higher. *That is within the City's wheelhouse.*
- Do a systematic review of all regulations for their cumulative effect. Each sort of makes sense on its own merits but when you later them together, it really shows things down. The carry cost of financing while plans are drafted and reviewed is about 1% per month of increase in the final cost of the project. The loess to review the faster we can go from site control for development to breaking ground. The faster construcion can happen. Do we really need on-site storm water retention, or can the City expand a wetland somewhere (Tukwila has done this banking wetland capacity), which is more ecologically beneficial. Look at each and every requirement in both

zoning and the UBC. How much "juice" do we get for the squeeze? Does it outweigh the impact to the final cost and retail rental rate of the project?

- Affordability has been a concern of voters in Burien for some time, particularly for those of lower to moderate incomes. It has been an expressed concern of current and past Councils. Rent regulation has failed. This is a supply-side problem. Time for the Council, and those that elect them, to put up or shut up on **radical** upzoning.

I have spent 25 years, mostly in non-profits, developing low-income projects (e.g. DESC, self-help sweat-equity programs, workforce housing). The cost of luxury development rental project, and affordable housing project are pretty similar. The high-end finishes like granite counter-tops, higher quality cabinets, floor coverings, extra common area amenities, etc. are drop in the bucket of total costs.

Neale Frothingham
Owner

From: Kathryn Adams-Lee <KathrynA@burienwa.gov>
Sent: Tuesday, March 5, 2024 8:40 AM
To: neale frothingham.info <neale@frothingham.info>
Cc: Alex Hunt <AlexH@burienwa.gov>
Subject: RE: 14847 8th Ave. S.

Good morning Neale Frothingham,

Before zoning regulations can be updated the Burien Comprehensive Plan must be updated. This can only be done as per State Law only once a Year. Fortunately Burien is in the process of doing a periodic update so that may be done by the end of this year. Increasing middle housing was already a consideration in Burien's Comprehensive Plan update process along with other housing concerns. The City then updates the zoning code to implement the Goals and Policy changes in the Comprehensive plan as well as any changes to the State laws that are applicable so these changes would be planned for 2025.

Alex Hunt is the Senior Planner working on this. I am copying him in case he can answer more specific questions you had about the specific address and here is the link to the Comprehensive Plan Updates <https://connect.burienwa.gov/projects/comprehensive-plan-update/>

Thanks,

Keri Adams-Lee
Planner (she/her)

City of Burien
206-812-7575 office
206-507-2540 cell
KathrynA@burienwa.gov
burienwa.gov

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From: neale frothingham.info <neale@frothingham.info>

Sent: Tuesday, March 5, 2024 7:42 AM

To: Public - Planning <planning@burienwa.gov>

Subject: 14847 8th Ave. S.

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Hello,

What is the *rough, estimated* timeline for the City of Burien to come into compliance with [HB 1110](#).

Will it likely allow a fourth unit at 14847 8th Ave. S.?

My reading of the bill is that you can't have a buildable residential lot in a City will less than four permissible residential units.

Neale Frothingham
Owner

From: Ashleigh-Nicole Williams
Sent: Monday, March 11, 2024 11:36 AM
To: Alex Hunt
Subject: FW: Draft burien 2044 plan comment

Ashleigh Williams
Planner

City of Burien

(206) 248-5508 office

AshleighW@Burienwa.gov

Burienwa.gov

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From: jessica giblin <giblinjessica7@gmail.com>
Sent: Monday, March 11, 2024 11:27 AM
To: Public - Planning <planning@burienwa.gov>
Subject: Draft burien 2044 plan comment

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Dear Senior Planner Alex Hunt,
I am writing to comment on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

I live on SW 132nd St. My neighbors made many public comments at planning commission meetings in 2023 explaining that large, mid-rise buildings are not appropriate for this area. I agree with what my neighbors have said in these public comments. Buildings larger than 3-4 stories should not be allowed in this area of all single-story homes near a very busy elementary school.

I am disappointed to see that the Draft Burien 2044 Comprehensive Plan shows buildings taller than 3-4 stories allowed in this area. Please change the recommended building heights to align with the map that was presented in the planning commission meeting on June 14 2023. On this map, SW 132nd St was designated as a maximum height of 3-4 stories.

Thank you. Jessica Giblin, resident on SW 132nd St.

From: Isabella Gunning <ninglan21@gmail.com>
Sent: Saturday, March 9, 2024 11:59 PM
To: Alex Hunt; Public - Planning
Subject: Draft Burien 2044 Comprehensive Plan Comments, re zoning SW 132nd Street.

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Dear Senior Planner Alex Hunt,

I am reaching out to provide feedback on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

Residing on SW 132nd St, I am compelled to echo the sentiments expressed by my parents and neighbors during the planning commission meetings in 2023. They articulated that the introduction of large, mid-rise buildings would not be conducive to our neighborhood's character. I concur with their stance, particularly given the proximity of our area to a bustling elementary school and its current landscape predominantly featuring single-story homes.

It is concerning that the Draft Burien 2044 Comprehensive Plan proposes allowing buildings exceeding 3 stories in height within our vicinity. I respectfully urge you to reconsider and adjust the recommended building heights to adhere to the map presented during the planning commission meeting on June 14, 2023. As indicated on that map, SW 132nd St was designated with a maximum height of 3 stories, which aligns more closely with the community's vision and concerns.

Thank you for your attention to this matter.

Sincerely,

Isabella Gunning

863 SW 132nd Street

Burien WA 98146

From: Steven Gunning <gunninggang@hotmail.com>
Sent: Saturday, March 9, 2024 11:53 PM
To: Alex Hunt; Public - Planning
Subject: Draft Burien 2044 Comprehensive Plan Comments, re zoning SW 132nd Street.

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Dear Senior Planner Alex Hunt,

I am reaching out to provide feedback on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

Residing on SW 132nd St, I am compelled to echo the sentiments expressed by my neighbors during the planning commission meetings in 2023. They articulated that the introduction of large, mid-rise buildings would not be conducive to our neighborhood's character. I concur with their stance, particularly given the proximity of our area to a bustling elementary school and its current landscape predominantly featuring single-story homes.

It is concerning that the Draft Burien 2044 Comprehensive Plan proposes allowing buildings exceeding 3 stories in height within our vicinity. I respectfully urge you to reconsider and adjust the recommended building heights to adhere to the map presented during the planning commission meeting on June 14, 2023. As indicated on that map, SW 132nd St was designated with a maximum height of 3 stories, which aligns more closely with the community's vision and concerns.

Thank you for your attention to this matter.

Sincerely,

Lynn Versteeg Gunning

206 794 5473

863 SW 132nd Street

Burien WA 98146

From: Ashleigh-Nicole Williams
Sent: Monday, March 11, 2024 8:07 AM
To: Alex Hunt
Subject: FW: Zoning Map Comments

Alex,

Forwarding the email below.

Ashleigh Williams
Planner

City of Burien

(206) 248-5508 office

AshleighW@Burienwa.gov

Burienwa.gov

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From: joshua.k.halpin@gmail.com <joshua.k.halpin@gmail.com>
Sent: Sunday, March 10, 2024 3:55 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Zoning Map Comments

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Hello:

A couple of points regarding the zoning map:

1. Burien should upzone under the flight pattern. Aviation is only going to get cleaner. Sound proofing will only get better. People are living happy and healthy lives under flight patterns. Land assemblies will be less expensive and complex which will translate to more housing quicker. Additionally, there are a lot of large lots in that part of town that would lend themselves to small multi family structures, row homes, and other kinds of missing middle housing. These will be accessible ownership opportunities. Further, for those who have lived under the flight pattern for many years will have an expanded market of possible buyers.

2. Burien needs to be working to get a light rail station. Any plan moving forward should make this a priority.

Many Thanks!

From: Alex Hunt
Sent: Monday, January 22, 2024 4:34 PM
To: JoAnn Pasek
Subject: FW: Questions about latest Comprehensive Plan

Hi JoAnn,

Thank you for your email.

Regarding the Urban Center: the area you have described on 7th Ave SW has been within the boundaries of [Burien's Urban Center](#) (as designated by the Puget Sound Regional Council) since before the Ambaum and Boulevard Park project initiated. So, this does not necessarily represent a change. That area was looked at with the Ambaum and Boulevard Park Plan because of its context and proximity to the Ambaum Corridor, but it has been and continues to be part of Burien's Urban Center.

Regarding your second item, I will first clarify the Ambaum and Boulevard Park Plan and the Comprehensive Plan Update are two distinct projects that will result in two distinct planning documents that will work in tandem. The term "unit" does not have a strict square footage number attached to it, it just refers to the number of individual dwelling units. For example, a single-family home or a single apartment unit would each count as one dwelling unit. If you are interested in building heights, the terms low-, mid-, and high-rise are more useful in those descriptions. I have included general height ranges for those terms below. More specific height requirements will be developed and shared as amendments to the Zoning Code are drafted. Ultimately, it will be the Zoning Code (not the Comprehensive Plan) that regulates how tall buildings may be. So, while these future land use designations establish a range of heights/densities, they will be refined/specified in the form of Zoning designations before development takes place under new standards.

Low-rise: 1-4 stories

Mid-rise: 5-12 stories

High-rise: 13+ stories

Let me know if there are additional questions.

Best,

Alex Hunt (he/him)
Senior Planner

City of Burien
(206) 439-3152 office
AlexH@burienwa.gov
Burienwa.gov

From: JoAnn Pasek <jpasek1400@gmail.com>
Sent: Wednesday, January 17, 2024 4:03 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Questions about latest Comprehensive Plan

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Hi,

I was reviewing the latest plan (above), received last week, & had some questions.

First, I noticed on p. 39 that my neighborhood, on 7th Ave SW, between 148th SW & 146th SW, is now in the downtown Burien area. In the previous Ambaum and Boulevard Park 2023 Final Plan, we were in the Ambaum corridor. I was surprised since I thought 148th SW, a major thoroughfare, was a natural division between downtown & north-central Burien.

Do you know why this change was made?

Second, on p.37-38 of the above plan, the land use descriptions, uses numbers of units per acre. This is also a change from the 2023 Final Plan, which used the number of bldg. stories in its housing descriptions.

I could not find a definition of "unit" in the new plan. Is it 500 sq ft, 800 sq ft, 1,000 sq ft, etc.? How would this "translate" into number of stories in a housing project?

Do you have this definition?

Thanks for any info.

--JoAnn Pasek

From: JoAnn Pasek <jpasek1400@gmail.com>
Sent: Thursday, March 7, 2024 11:40 AM
To: Alex Hunt; Public - Planning
Subject: Comments on the 2024 Proposed Comprehensive Plan for Burien

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I live on 7th Ave SW, between 148th St SW & 146th St SW, in Burien.

We are a long established residential neighborhood of single family homes and I do not understand why we are included in the Downtown Burien core—a high growth commercial hub. I believe 148th St SW has always been a natural dividing line between north-central & downtown Burien. I ask that this please be changed to reflect our reality.

The proposed plan also shows that only the wealthy, mainly white, areas around Lake Burien and along the coast remain residential low density, with the lowest risk of displacement. Of course, I would prefer our area remain low density but if we are zoned for medium residential, so should everyone else.

How can Burien talk about social equity and justice when the areas outside of Lake Burien & the coast bear the burden of higher density with the resulting increase in traffic, noise, pollution, property taxes, and loss of affordable housing? Burien's increase in population should be born by all equally.

Thank you for the opportunity to comment.

–J. Pasek

From: Ashleigh-Nicole Williams
Sent: Monday, March 11, 2024 9:37 AM
To: Alex Hunt
Subject: FW: Proposed Zoning Plan

Ashleigh Williams
Planner

City of Burien

(206) 248-5508 office

AshleighW@Burienwa.gov

Burienwa.gov

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From: FLORA PIPPENGER <f.pippenger@comcast.net>
Sent: Monday, March 11, 2024 9:28 AM
To: Public - Planning <planning@burienwa.gov>
Subject: Proposed Zoning Plan

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Dear Senior Planner Alex Hunt,

I am writing to comment on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

I live on SW 132nd St. My neighbors and I have made many public comments at planning commission meetings (and at the gathering you attended in our neighborhood) in 2023 explaining that large, mid-rise buildings are inappropriate for this area. I agree with what my neighbors have said in these public comments. Buildings larger than 3-4 stories should not be allowed in this area of currently single-story homes near a very busy elementary school.

I am disappointed to see that the Draft Burien 2044 Comprehensive Plan shows buildings taller than 3-4 stories allowed in this area. Please change the recommended building heights to align with the map that was presented in the planning commission meeting on June 14 2023. On this map, SW 132nd St was designated as a maximum height of 3-4 stories.

Thank you,

Flora Pippenger

From: Ashleigh-Nicole Williams
Sent: Monday, March 11, 2024 8:11 AM
To: Alex Hunt
Subject: FW: Burien 2044 Comprehensive Plan - Concerns Regarding Density Around SW 132nd St and Ambaum Corridor

Alex,

Forwarding another comment regarding the draft comp plan.

Ashleigh Williams
Planner

City of Burien

(206) 248-5508 office

AshleighW@Burienwa.gov

Burienwa.gov

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From: Alejandro Polo <alejandropolo@gmail.com>
Sent: Sunday, March 10, 2024 10:07 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Burien 2044 Comprehensive Plan - Concerns Regarding Density Around SW 132nd St and Ambaum Corridor

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Dear Alex Hunt,

I am writing to express my concerns about the density proposals in the Draft Burien 2044 Comprehensive Plan, particularly around SW 132nd St and the Ambaum Corridor. As a resident on SW 132nd St, I'm strongly opposed to any proposals with buildings that exceed 3 stories in height in this areas, due to:

- **Excessive shade:** Taller buildings would cast long shadows on nearby homes for a significant part of the year.

- **Traffic congestion:** Increased density would worsen traffic issues around Hazel Valley Elementary and surrounding areas.
- **Limited transit access:** The current plan prioritizes density near Ambaum, which lacks east-west bus routes and a full-service grocery store.

These, as well as other reasons, have been voiced in the past both to you and the Planning Commission, so I will not go into detail here.

In my opinion, the plan should focus on densification along 1st Ave SW instead, since this area offers amenities, has plenty of underutilized lots, and offers great potential for both rapid ride and standard bus lines.

I urge you to keep the density designations around SW 132nd St stay as 3-storey or under, and that the plan prioritizes development near 1st Ave SW and downtown Burien.

Thank you for your time and consideration.

Sincerely,

Alejandro Polo Nunez

From: Kathryn Adams-Lee
Sent: Tuesday, March 5, 2024 8:24 AM
To: Alex Hunt
Subject: FW: Burien 2044 Comprehensive Plan and the ABP Plan

Hi Alex,

Please see below for another email for you.

Thanks,

Keri Adams-Lee
Planner (she/her)

City of Burien

206-812-7575 office

206-507-2540 cell

KathrynA@burienwa.gov

burienwa.gov

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From: Dominic Searle <dominicsearle1@gmail.com>
Sent: Monday, March 4, 2024 7:34 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Burien 2044 Comprehensive Plan and the ABP Plan

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Dear Sir/Madam

Please be aware that the residents of SW132ND ST are very concerned about the plan to raise the level of housing. As a resident myself I am very much in favor of keeping it to a maximum of 3 stories on a very small road with only a sidewalk on one side and an elementary school at the intersection of 4th avenue.

Large scale housing will increase the risk of death to school children.

Many thanks

Dominic Searle

From: Steven Gunning <gunninggang@hotmail.com>
Sent: Saturday, March 9, 2024 11:53 PM
To: Alex Hunt; Public - Planning
Subject: Draft Burien 2044 Comprehensive Plan Comments, re zoning SW 132nd Street.

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Dear Senior Planner Alex Hunt,

I am reaching out to provide feedback on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

Residing on SW 132nd St, I am compelled to echo the sentiments expressed by my neighbors during the planning commission meetings in 2023. They articulated that the introduction of large, mid-rise buildings would not be conducive to our neighborhood's character. I concur with their stance, particularly given the proximity of our area to a bustling elementary school and its current landscape predominantly featuring single-story homes.

It is concerning that the Draft Burien 2044 Comprehensive Plan proposes allowing buildings exceeding 3 stories in height within our vicinity. I respectfully urge you to reconsider and adjust the recommended building heights to adhere to the map presented during the planning commission meeting on June 14, 2023. As indicated on that map, SW 132nd St was designated with a maximum height of 3 stories, which aligns more closely with the community's vision and concerns.

Thank you for your attention to this matter.

Sincerely,

Lynn Versteeg Gunning

206 794 5473

863 SW 132nd Street

Burien WA 98146

From: Kathryn Adams-Lee
Sent: Tuesday, March 5, 2024 8:23 AM
To: Alex Hunt
Subject: FW: Comment on Burien 2044 Comprehensive Plan Update

Good morning Alex,

See below email sent to the Public Planning e-mail for you

Keri Adams-Lee
Planner (she/her)

City of Burien

206-812-7575 office
206-507-2540 cell
KathrynA@burienwa.gov
burienwa.gov

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From: Michele Yugen Lewis <m.yugen.lewis@gmail.com>
Sent: Monday, March 4, 2024 6:47 PM
To: Public - Planning <planning@burienwa.gov>
Subject: Comment on Burien 2044 Comprehensive Plan Update

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Dear Senior Planner Alex Hunt,
This is a comment in response to the Draft Burien 2044 Comprehensive Plan.

I live on SW 132nd St and am a part of the SW 132nd cohort who attended and made public comments at Planning Commission meetings in 2023. Residents in this area were very upset when they saw that the final Ambaum Boulevard Park (ABP) plan was zoning the blocks south of SW 132nd Street with 6-7 story buildings. When I surveyed the residents

along this street, they almost unanimously said they didn't want buildings taller than 2 stories (one person was okay with 3 stories and a couple said 1 story only). In the June 14, 2023 planning commission meeting, a zoning map for ABP was presented and showed the blocks south of SW 132nd Street changed to 3-4 stories. While this is still taller than residents wanted, most felt it was a much more tolerable height than the previously drafted 6-7 stories.

We recently saw that the Draft Burien 2044 Comprehensive Plan was created. Looking at the maps in exhibits 2-4, 2-5 and 2-6, it appears that the areas around SW 132nd Street allows heights up to mid-rise. Mid-rise is generally defined as taller than 5 stories. As the residents of SW 132nd described in various public comments during planning commission meetings in 2023, we think buildings of this height and density are not appropriate in this area.

I recently (Jan 11, 2024) emailed you (Alex Hunt) to ask about this discrepancy between the June 14, 2023 ABP presentation and the Draft Burien 2044 Comprehensive Plan and you said you would discuss this with the team. I write this hoping the team will change the Comprehensive Plan and ABP Plan to match the ABP map presented on June 14, 2023 that shows the area around SW 132nd St limited to 3 stories.

For the sake of clarity for the new planning commission, I would like to very briefly recap some of the reasons why we are opposed to buildings over 3 stories.

1) Shade/shadow: Because of our latitude, buildings to the south cast very long shadows for most of the year. Using a shade calculator and including large setbacks, a 6-7 story building would block sun from single story homes to the north for 6 months of the year. In December and January at midday, the shadow cast would cover the entire length of the properties to the north. The addition of a 45 degree setback of the building face would not improve this due to the orientation of the street and location of the sun. In general, we should consider locating taller buildings in a north-south orientation and if east-west, only along wide arterials where the shadow cast would need to cross a wide roadway before affecting buildings to the north. For example, locating tall buildings along 1st Ave SW in a north-south orientation would have minimal impact on surrounding residential areas when considering both the southern sun and desirable afternoon sun from the west. Personally I find it odd that the EIS addresses the effect of shade on very transient spaces like sidewalks, but does not really address its effect on the homes where people spend many hours of their lives.

2) Traffic & School: Hazel Valley Elementary is on SW 132nd St. There is daily congestion around school dismissal times, and it is common to be stuck in school traffic for 10 minutes. I placed a comment describing this on the online interactive map that was available at the end of 2022. It was heavily up-voted by neighbors, as this is a problem we deal with routinely. This was mentioned by the Public Works Director in the Shape Your City presentation on Feb 6, 2023. However, this comment (and many others) are missing from the appendix of the ABP plan. One of the residents of SW 132nd St is a school bus driver for Highline schools and has made several public comments about this, saying that Hazel Valley Elementary is known among the bus drivers to be one of the most difficult and congested schools. The traffic added by 6-7 story buildings would further worsen safety for the kids.

3) Traffic and Transit: The current Draft Burien 2044 Comprehensive Plan puts too much emphasis on density around Ambaum and too little along 1st Ave SW and around the Burien transit center. All major grocery stores and highways are on or very near to 1st Ave SW. As a result, the population that lives west of 1st Ave SW needs to travel east to run errands and access highways. There are no east-west bus routes crossing Ambaum that take people to major grocery stores without a transfer at the Burien transit center. There is also only one bus route to downtown Seattle along Ambaum that is a 1 hour commute each way. I hear that Burien would like to encourage a car-free lifestyle, but the current transit arrangement will not support this. This will result in increased traffic congestion east of Ambaum and encourage car dependency. Current small specialty grocery stores on Ambaum are expensive and not adequate for most residents' needs. Additionally, given that a typical full-service grocery store needs between 5000-20,000 residents within a short distance to support it, there is no evidence that a full-service store would become viable on Ambaum.

4) Parks: The area of Evansville contains zero parks. There seems to be an unrealistic assumption that children can walk to Chelsea Park, Jacob Ambaum or Puget Sound Park. Children in Evansville need to cross major arterials to reach these

parks. They are also much further than most parents would feel comfortable allowing their young child to walk to alone. Many parents do not have the time to take their child to and from the park as often as is needed for apartment living. In contrast, most of Burien's neighborhood parks are located near 1st Ave SW, 4th Ave SW, and the downtown core. Residential density should be focused along 1st Ave SW and near the transit center for easy access to parks.

5) Environmental: Areas along Ambaum already have low tree scores. Construction of large buildings in areas that are currently lower density residential, will result in tree removal. The current fees for removing trees is insignificant to large developers and will not discourage them from removing trees. Large residential buildings should be built in areas of currently underutilized large commercial lots that do not contain tree canopy. Burien has a lot of these underutilized commercial lots. Most are along 1st Ave SW and near the transit center. Allowing mixed-use in these already paved areas would not affect our tree canopy negatively.

6) Better Alternatives: As I mentioned earlier, I really feel that the 2044 Comprehensive Plan does not take advantage of 1st Ave S and its 3 grocery stores and proximity to parks and transit. Why is the area between 4th Ave SW and 1st Ave S assigned as Residential Low? The area around SW 128th and 1st has a grocery store and two large parks, but it is still designated as Residential Low. Why is there no increased density to the east of 1st Ave SW near areas of parks (Arbor Lake)? Overall, the proposed Alternative 2 makes more sense for areas outside downtown. Alternative 3 makes more sense for downtown density. In both alternatives, there is an odd lack of density north of Community Park, an area that is very close to the transit center, 3 grocery stores, drug store and the community center. The fastest commute to downtown Seattle is 30minutes using Route 121 from the Burien Transit Center. The transit center also provides many routes to accommodate the needs of different residents. We should take advantage of this and locate as much density here as possible.

7) Future thinking for transit: The proposed 2044 Comprehensive alternatives do not think about the future of transit in Burien. Currently, the plan is attempting to create transit oriented development around the H-line. It is not considering that with more density on 1st Ave S and downtown, the current KC Metro line (131) could also be upgraded to a Rapid Ride. The current bus line on 1st Ave S takes only 10 minutes longer than the H-line to commute to downtown Seattle. The plan also does not consider the need for bus-lines that connect Burien west to east or even to connect outlying areas east of 509. The over-emphasis of density on Ambaum and the under-emphasis on 1st Ave SW will result in more car dependency, not less. Most of Burien's errand locations and community resources are on 1st Ave SW and in downtown. It makes more sense for density to be near these locations.

In summary, the area around SW 132nd St near Ambaum is designated as too high a density in the 2044 Comprehensive Plan. Buildings in this area should be no taller than 3 stories. The current map designations show these areas as possible 5 stories or higher. Residents of SW 132nd St have spoken at previous Planning Commission meetings about this in 2023. Additionally, there is too much density planned for the Ambaum Corridor overall. And more density should be planned for 1st Ave SW and downtown, where there is more access to major grocery stores, drug stores, parks, the community center and the transit center.

Thank you for taking the time to read this lengthy letter and for your consideration of our concerns.

Michele Lewis

--

Michele Yugen Lewis

www.yugenarts.com

From: [Lily Gunning](#)
To: [Alex Hunt](#)
Subject: Fwd: Draft Burien 2044 Comprehensive Plan Comments, re zoning SW 132nd Street.
Date: Sunday, March 10, 2024 12:07:42 AM

Letter 26

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----- Forwarded message -----

From: Lily Gunning <fenglan639@gmail.com>
Date: Sun, Mar 10, 2024 at 12:01 AM
Subject: Draft Burien 2044 Comprehensive Plan Comments, re zoning SW 132nd Street.
To: <alexh@burienwa.go>, <planning@burienwa.go>

Dear Senior Planner Alex Hunt,

I am reaching out to provide feedback on the Draft Burien 2044 Comprehensive Plan and the Ambaum Boulevard Park Plan.

Residing on SW 132nd St, I am compelled to echo the sentiments expressed by my parents and neighbors during the planning commission meetings in 2023. They articulated that the introduction of large, mid-rise buildings would not be conducive to our neighborhood's character. I concur with their stance, particularly given the proximity of our area to a bustling elementary school and its current landscape predominantly featuring single-story homes.

It is concerning that the Draft Burien 2044 Comprehensive Plan proposes allowing buildings exceeding 3 stories in height within our vicinity. I respectfully urge you to reconsider and adjust the recommended building heights to adhere to the map presented during the planning commission meeting on June 14, 2023. As indicated on that map, SW 132nd St was designated with a maximum height of 3 stories, which aligns more closely with the community's vision and concerns.

Thank you for your attention to this matter.

Sincerely,

Lily Gunning

863 SW 132nd Street

Burien WA 98146

C Land Capacity Evaluation

Land Capacity

Burien 2044 Alternatives

October 2024

Introduction

The City of Burien is conducting a periodic update of its Comprehensive Plan addressing a new 20-year growth target for housing and jobs, a new future land use map and zoning districts, and updated goals and policies that fulfill Burien’s vision and requirements in the Growth Management Act, Countywide Planning Policies, and VISION 2050.

The purpose of this document is to provide a summary of the land capacity under current land use designations in the Burien Comprehensive Plan and zoning, and to compare that to land use and growth alternatives under considering as part of the Burien 2044 Comprehensive Plan Periodic Update. This document helps the City meet the following requirements:

- ▶ **Urban Growth:** Based upon the growth management population projection made for the county by the office of financial management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period... As part of this planning process, each city within the county must include areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses. (See: [RCW 36.70A.110\(2\)](#))
- ▶ **Housing Element:** Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing. (See: [RCW 36.70A.070\(2\)\(c\)](#) amended in 2021, [WAC 365-196-410\(e\)](#) and [\(f\)](#))

Results of the land capacity analysis are included in the Draft Burien 2044 Comprehensive Plan and Burien 2044 Draft Environmental Impact Statement (Draft EIS).

- ▶ Main Page: <https://connect.burienwa.gov/projects/comprehensive-plan-update/>
- ▶ [Burien 2044 Comprehensive Plan \(January 2024 Draft\)](#)
- ▶ [Burien 2044 Draft Environmental Impact Statement \(EIS\)](#)
 - [EIS Appendices](#)
- ▶ The Preferred Alternative was developed by the Planning Commission in July 2024 and is under evaluation in the Final EIS in fall 2024.

Alternatives

Burien’s Comprehensive Plan, particularly the Land Use Element, guides the shape and layout of Burien’s districts and development over time. It provides a framework for Burien to distribute land uses and intensities across the city to meet residential, employment, services, recreation, public

facilities, and other land use needs equitably, efficiently, and for a prosperous, safe community. The City adopted a Comprehensive Plan in 1997 after incorporation in 1993. The City last amended its Comprehensive Plan in 2022. The current plan is designed for the year 2035. Recently, based on the VISION 2050 Regional Growth Strategy applicable to Central Puget Sound and King County Countywide Planning Policies last amended in 2021 and 2023, the City has a new set of growth targets for the year 2019-2044.

The Growth Management Act (GMA) requires that King County and its cities allocate a fair share of housing over a 20-year period through Countywide Planning Policies. Burien is required to address housing targets at all income levels and has a target of 7,500 net new dwelling units, as well as 1,433 emergency housing and shelter beds. The City also has a jobs target of 4,770. See Exhibit 1.

Exhibit 1. Housing Targets with Income Bands and Emergency Housing: 2019-2044

Target Type	Target: Net Increase 2019-2044
0-30% Permanent Supportive Housing	759
0-30% Other	1,444
30-50%	524
50-80%	407
80-100%	574
100-120%	650
120%+	3,142
Housing 2019-2044	7,500
Emergency housing and shelter beds	1,433
Jobs	4,770

Source: King County, Countywide Planning Policies, 2023.

In 2021, King County published the Urban Growth Capacity (UGC) Report identifying how each city and the County was performing meeting its prior 2035 targets and its overall capacity for growth as of 2019 independent of a horizon year. The King County Urban Growth Capacity Report (2021) identifies the City can meet housing targets, but the underlying data had a formula error and the City can meet 90% of the housing target. The City cannot meet jobs targets under current Future Land Use Plan. Additionally, based on an alignment of current zones to the likelihood to produce units at the desired income levels, the current plan would not have the capacity to result in the housing needed. See Exhibit 2.

Exhibit 2. Alternative 1 Growth Capacity

	Target: 2019-2044	Urban Growth Capacity 2019	Capacity Reevaluation 2023/ Assumed for Study in EIS
Housing units	7,500	6,712*	6,499
Jobs	4,770	752	1,760

*Corrects results compared to the King County Urban Growth Capacity Report, 2021.

Source: King County, 2021; BERK 2023.

The City is considering growth alternatives, Alternative 2: Neighborhood Centers and Alternative 3: Greater Downtown and the Preferred Alternative, evaluating those alternatives in comparison to the current plan, Alternative 1: No Action. Action alternatives would have capacity to create the housing units needed. Alternative 3 and the Preferred Alternative in particular would meet job targets.

- ▶ **Alternative 1: No Action**—Continues the current Comprehensive Plan and zoning regulations. The current plan provides capacity below growth targets of 7,500 housing units and 4,770 jobs.
- ▶ **Alternative 2 Neighborhood Centers** would focus mixed uses and multifamily residential uses in neighborhood centers with primary nodes in Downtown and along transit corridors including Ambaum Boulevard SW, 1st Avenue S, and Boulevard Park. Middle housing would be addressed in Residential Low with the widest range of middle housing in proximity to Neighborhood Centers or corridors, and a moderate range of middle housing in the balance of single-family residential areas. Jobs would continue to be focused in the Urban Center and in Industrial Areas with a mixed use expansion west of the Northeast Redevelopment Area. The alternative can meet housing growth targets for 2044 but is less than the target for jobs.
- ▶ **Alternative 3 Greater Downtown** would also increase housing variety, affordability, and capacity including low density, moderate density, and high-density housing and mixed use areas. The land use pattern would emphasize investment in the Urban Center and beyond along 1st Avenue S. The Northeast Redevelopment Area would be expanded westward for mixed use and northwards with light industrial job opportunities. The alternative can meet both housing growth targets and jobs growth targets.
- ▶ The Preferred Alternative provides for more dense downtown development and strong neighborhood nodes. There is a focus on the Greater Downtown in the Urban Center and along 1st Avenue S, and nodes for mixed uses along corridors, particularly Ambaum Corridor, 1st Avenue S and Des Moines Memorial Drive. It includes a variety of housing types including Residential Medium along corridors. It provides for a range of middle housing types in Residential Low 1 and 2. Jobs are focused in the Greater Downtown and the Northeast Redevelopment Area.

Action Alternatives 2 and 3 and the Preferred Alternative update the Future Land Use Map and implement the map with amended zoning. The designations in the proposed Future Land Use Map are more simplified than the designations in Burien's current Comprehensive Plan but similarly focus growth in the Downtown Urban Center and corridors with multifamily and mixed use categories. See Exhibit 3 and Exhibit 4. Larger size maps are found in the Appendix.

Exhibit 3. Alternatives 2 and 3 and Preferred Alternative Future Land Use Description

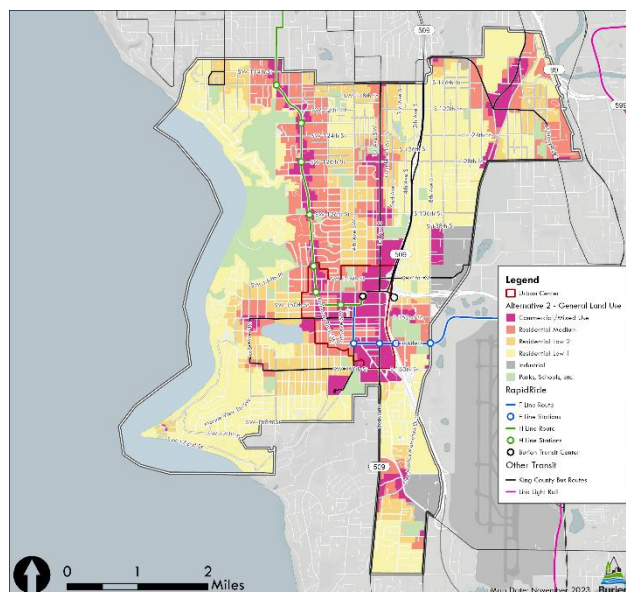
Name	Future Land Use Description
Downtown Urban Center	Burien's most intense mix of commercial and residential development with a focus on jobs, transit orientation, Burien's civic center, arts and culture, and entertainment. Buildings may be a mix of low, mid, and high rise development.
Commercial/Mixed Use	A mix of commercial, mixed-use, and residential buildings, ranging from single-story to midrise development that provides services, jobs, and housing to Burien's residents and are located near transit and/or amenities.

Name	Future Land Use Description
Residential Medium	Primarily multi-story residential buildings, including low-rise and midrise apartments/condominiums, townhouses, and other building types located near transit and/or amenities. Some buildings include small commercial ground floor uses.
Residential Low 2	Primarily moderate-scale middle housing types, including a mix of townhouses, multiplexes, courtyard apartments, and detached houses.
Residential Low 1	Primarily detached houses with some duplexes, cottage clusters, and other low-scale middle housing types.
Industrial	Primarily employment-oriented land uses like warehouses, workshops, manufacturing facilities, processing and distribution, business park and flex-tech, small office or flexible buildings, and auto sales.
Parks & schools	Parks, schools, community centers, trails, open spaces, and other public and quasi-public facilities and properties.

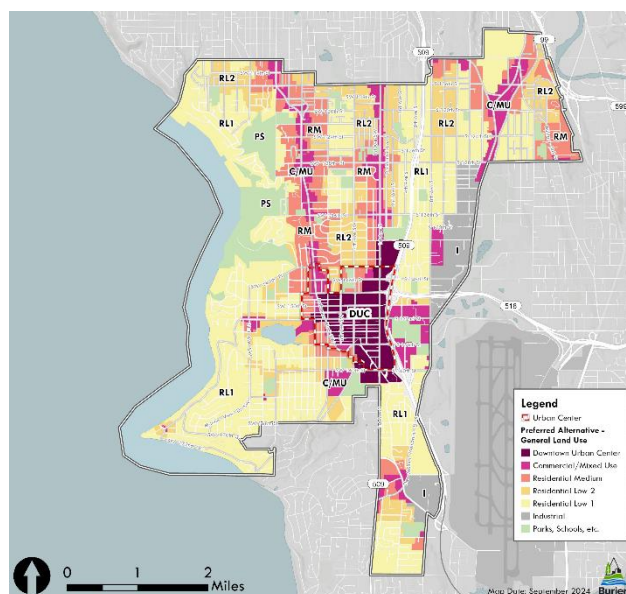
Source: Makers, 2023.

Alternative 1 No Action	Alternative 2 Neighborhood Center
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Alternative 2 Neighborhood Center



Preferred Alternative



Zoning concepts are preliminarily under development based on Ambaum Boulevard Park Community Plan draft zoning, a Middle Housing grant in 2023, an Economic analysis of the City's current zoning, and Urban Center zoning concepts studied in the Burien 2044 Draft EIS. The new land use designations and implementing zone names and abbreviations are listed in Exhibit 5.

Exhibit 5. Land Use Designations and Implementing Zoning (Conceptual)

Land Use Designation	Implementing Zone Name (Conceptual)	Abbreviations: Implementing Zones (Conceptual)
Downtown Urban Center	Mixed Use Urban Center	MUUC
	Mixed Use Arterial	MU-A
	Mixed Use Downtown	MU-DT
	Mixed Use Downtown Pedestrian Retail Overlay	(in code not in map)
	Mixed Use High	MU-2
	Mixed Use High Employment	MU-2 E
	Mixed Use High Creative District	MU-2 CD
Commercial/Mixed Use	Mixed Use Low	MU-1
	Mixed Use Low Boulevard Park	MU-1 BP
	Mixed Use High	MU-2
	Mixed Use Commercial	MU-C
Industrial	Industrial	I
Parks, Schools, etc.	Parks, Recreation, Schools	PRS
Residential Low 1	Residential 1, Residential 2	R1/R2
Residential Low 2	Residential 3	R3
Residential Medium	Residential 4	R4
	Residential 5	R5

For more background on zoning concepts: please see:

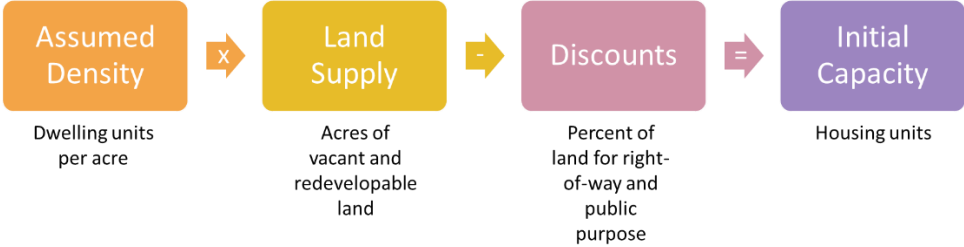
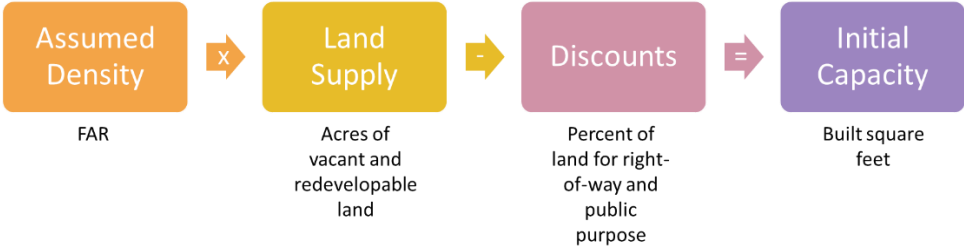
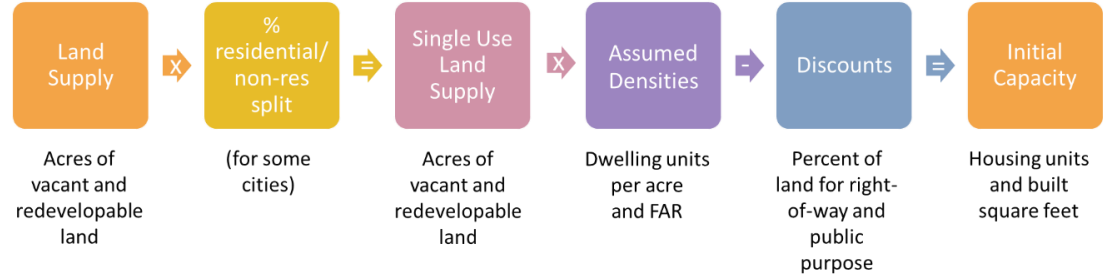
- ▶ Ambaum Boulevard Park: (Mixed use zoning concepts)
 - Main Page and Community Plan: <https://connect.burienwa.gov/final-draft-of-ambaum-and-boulevard-park-plan-published/>
 - The City issued the Final EIS for the Ambaum Corridor and Boulevard Park Planned Action in April 2023. See [Draft EIS](#) and [Final EIS](#).
- ▶ Racially Disparate Impacts (RDI) Evaluation and Middle Housing Zoning Concepts:
 - [Burien Housing Policy Evaluation: Racially Disparate Impacts, Displacement, and Exclusion in Housing](#) (Mixed use and middle housing zoning considerations)
 - [June 2023 Middle Housing Staff Report](#)
 - [June 2023 Middle Housing Staff Report Attachments](#)
 - [Spring 2023 Housing Community Engagement Summary](#) (Need for housing of all types)
- ▶ [Burien Economic Development Analysis](#) (Evaluation and developer interviews applicable to jobs and housing)
- ▶ [Burien 2044 Draft Environmental Impact Statement \(EIS\)](#) (Urban Center zoning and heights)
 - [EIS Appendices](#)
- ▶ Planning Commission [agenda packets](#) March 13 to June 12, 2024 and City Council agenda packets July 22 to October 7, 2024.

Method and Results

Land Capacity Method

The land capacity methodology in the King County Urban Growth Capacity (UGC) Report is summarized in the charts below together with adjustments to the method reflecting new land use alternatives and policies. See Exhibit 6.

Exhibit 6. Methodology – King County Urban Growth Capacity (UGC) Report (2019)

Calculating Residential Capacity	Adjustments
 <pre> graph LR A[Assumed Density Dwelling units per acre] -- x --> B[Land Supply Acres of vacant and redevelopable land] B -- = --> C[Discounts Percent of land for right-of-way and public purpose] C -- = --> D[Initial Capacity Housing units] </pre>	▶ Assumed densities modified based on market and architectural evaluations. ▶ Redevelopable land updated to 2023 using methods in UGC. ▶ Discounts in range of 2019 UGC Report.
Calculating Non-Residential Capacity	
 <pre> graph LR A[Assumed Density FAR] -- x --> B[Land Supply Acres of vacant and redevelopable land] B -- = --> C[Discounts Percent of land for right-of-way and public purpose] C -- = --> D[Initial Capacity Built square feet] </pre>	▶ Same as above plus the following. ▶ Floor area ratios (FAR) and job densities modified reflecting maturing city (like north county).
Calculating Mixed-use Capacity	
 <pre> graph LR A[Land Supply Acres of vacant and redevelopable land] -- x --> B[% residential/non-res split (for some cities)] B -- = --> C[Single Use Land Supply Acres of vacant and redevelopable land] C -- x --> D[Assumed Densities Dwelling units per acre and FAR] D -- = --> E[Discounts Percent of land for right-of-way and public purpose] E -- = --> F[Initial Capacity Housing units and built square feet] </pre>	▶ Same as above plus the following. ▶ Adjusted mixed use split (job retention policies), and parking adjustments.

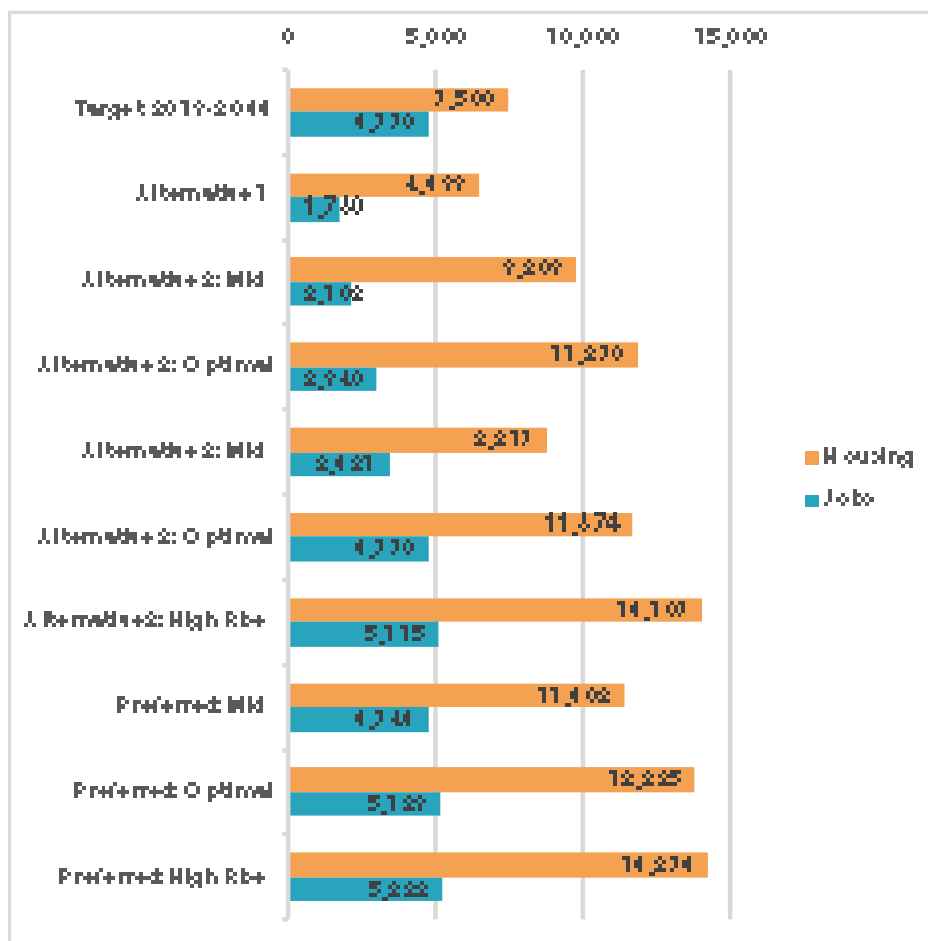
Source: King County Phase 3 Guidance Document, 2020.

Land Capacity Results – Alternatives

The results of the land capacity analysis are presented in Exhibit 7 below. Alternative 1 No Action does not meet housing or job targets with present land use designations and zoning. Alternative 2 provides sufficient capacity at mid-range densities to meet housing targets, and greater capacity at optimal densities. Alternative 2 cannot meet job targets though it has greater capacity than Alternative 1. Alternative 3 meets both housing and job targets at either mid-range or optimal densities. The Preferred Alternative at midpoint densities meets housing targets and essentially meets the job target, and at optimal or high-rise densities meets housing and job targets.

While the City allows office uses in many zones, it is unlikely that the City would see multi-story office which often produces higher job densities. The jobs depend on productivity of commercial retail/services, mixed use, and industrial zones on the updated buildable land supply base with greater redevelopable land. It also depends on the ongoing home-based businesses and services that are found in residential areas (e.g., senior care).

Exhibit 7. Housing and Job Capacity



King County 2019, BERK 2024

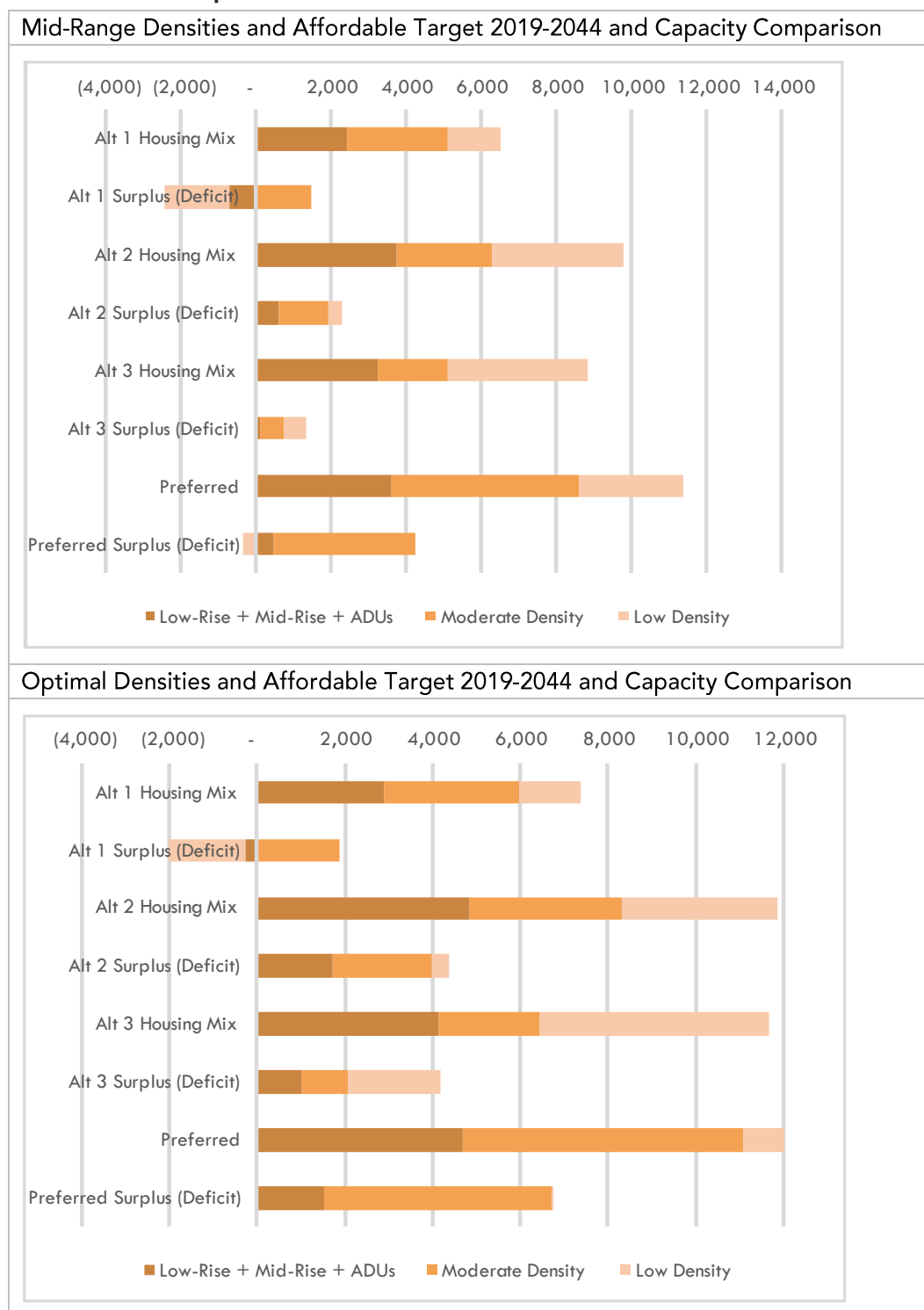
Alternative 1 does not have enough capacity in zoning categories most likely to produce housing affordable to households earning 0-80% area median income (AMI) or above 120% AMI. See Exhibit 8.

From 2005 to 2021 the rate of new accessory dwelling units to the total number of residential units produced was 7%. ADUs are allowed in single-family residential zones across the city up to two per lot. Based on more recent trends for accessory dwelling units (ADUs) in Burien and recent legislation Alternative 1 could reverse the low income gap.

Alternatives 2 and 3 provide sufficient housing types at all income levels. See Exhibit 8. Optimal densities are those identified in market and architectural studies (see appendix). These densities would produce surplus capacity. Mid-range densities produce sufficient capacity with less “cushion” particularly Alternative 3. If only minimum densities were applied the affordable housing units would not be sufficient. See Exhibit 8 with details in Exhibit 9 to Exhibit 11.

At midpoint densities, the Preferred Alternative meets 0-80% and 80-120% income levels with expected zones and densities, but it shows capacity slightly below the 120%+ target if all of the RL2 designation is at the 80-120% income level and all of RL1 is at the 120% income level; however, since detached housing as well as townhomes are allowed in both, it is likely that the market would provide housing at above 120% level to meet market demand. Moving 10% of capacity from 80-120% dwellings to 120%+ income level would result in no deficit. At optimal densities described later in this document, all income levels can be met.

Exhibit 8. Net Capacity Surplus (or Deficit) to meet Affordable Housing Targets Mid-Range and Optimal Densities



Mid-Range Densities for No Action do not include ADUs on top of land capacity following the Urban Growth Capacity Report methodology. Optimal densities include ADUs for No Action and reduce the deficit.

Exhibit 9. Alternative 1-Mid Densities: Capacity with King County Urban Growth Capacity Land Base (2019)

Area Median Income	Projected Housing Need (2044)	Zone Categories	Aggregate Housing Need	Net Aggregate Housing Need	Total Housing Capacity	Capacity Surplus/ Deficit (Gross)	Capacity Surplus/ Deficit (Net)
0-30% PSH	759						
0-30% Other	1,444						
30-50%	524						
50-80%	407	Low-Rise, Mid-Rise	3,134	3,084	2,434	-700	-652
80-100%	574	Moderate Density	1,224	1,040	2,677	1,453	1,645
100-120%	650	Low Density	3,142	3,095	1,387	-1,755	-1,714
120%+	3,142						
Total	7,500		7,500	7,219	6,498	-1,002	-721

Exhibit 10. Alternative 2-Mid Densities: Capacity with King County Urban Growth Capacity Land Base (2019)

Area Median Income	Projected Housing Need (2044)	Zone Categories	Aggregate Housing Need	Net Aggregate Housing Need	Total Housing Capacity	Capacity Surplus/ Deficit (Gross)	Capacity Surplus/ Deficit (Net)
0-30% PSH	759						
0-30% Other	1,444						
30-50%	524						
50-80%	407	Low-Rise, Mid-Rise	3,134	3,084	3,725	591	641
80-100%	574	Moderate Density	1,224	1,040	2,554	1,330	1514
100-120%	650						
120%+	3,142	Low Density	3,142	3,095	3,530	388	435
Total	7,500		7,500	7,219	9,809	2,309	2,590

Exhibit 11. Alternative 3-Mid Densities: Capacity with King County Urban Growth Capacity Land Base (2019)

Area Median Income	Projected Housing Need (2044)	Zone Categories	Aggregate Housing Need	Net Aggregate Housing Need	Total Housing Capacity	Capacity Surplus/ Deficit	Capacity Surplus/ Deficit (Net)
0-30% PSH	759						
0-30% Other	1,444						
30-50%	524						
50-80%	407	Low-Rise, Mid-Rise	3,134	3,084	3,240	106	156
80-100%	574	Moderate Density	1,224	1,040	1,856	632	816
100-120%	650						
120%+	3,142	Low Density	3,142	3,095	3,721	579	626
Total	7,500		7,500	7,219	8,817	1,317	1,598

Exhibit 12. Preferred Alternative-Mid Densities Unadjusted: Capacity with King County Urban Growth Capacity Land Base (2019)

Area Median Income	Projected Housing Need (2044)	Zone Categories	Aggregate Housing Need	Net Aggregate Housing Need	Total Housing Capacity	Capacity Surplus/ Deficit	Capacity Surplus/ Deficit (Net)
0-30% PSH	759						
0-30% Other	1,444						
30-50%	524						
50-80%	407	Low-Rise, Mid-Rise	3,134	3,084	3,587	453	505
80-100%	574						
100-120%	650	Moderate Density	1,224	1,040	5,001	3,777	3,777
120%+	3,142	Low Density	3,142	3,095	2,813	-329	-295
Total	7,500		7,500	7,219	11,402	3,902	4,183

Exhibit 13. Preferred Alternative-Mid Densities Adjusted: Capacity with King County Urban Growth Capacity Land Base (2019)

Area Median Income	Projected Housing Need (2044)	Zone Categories	Aggregate Housing Need	Net Aggregate Housing Need	Total Housing Capacity	Capacity Surplus/ Deficit	Capacity Surplus/ Deficit (Net)
0-30% PSH	759						
0-30% Other	1,444						
30-50%	524						
50-80%	407	Low-Rise, Mid-Rise	3,134	3,084	3,587	453	505
80-100%	574						
100-120%	650	Moderate Density	1,224	1,040	4,501	3,277	3,472
120%+	3,142	Low Density	3,142	3,095	3,313	171	205
Total	7,500		7,500	7,219	11,402	3,902	4,183

Notes: Since 2020, about 281 units have been permitted with and it is likely the units mostly fall in the 80-120% AMI income level. About 230 units occurred in the Urban Center, 45 in the Residential Low areas (including 4 in area proposed for Industrial), 2 in Residential, and 4 in Commercial Mixed Use.

PSH = Permanent Supportive Housing.

Source: King County 2019 and BERK 2023 and 2024.

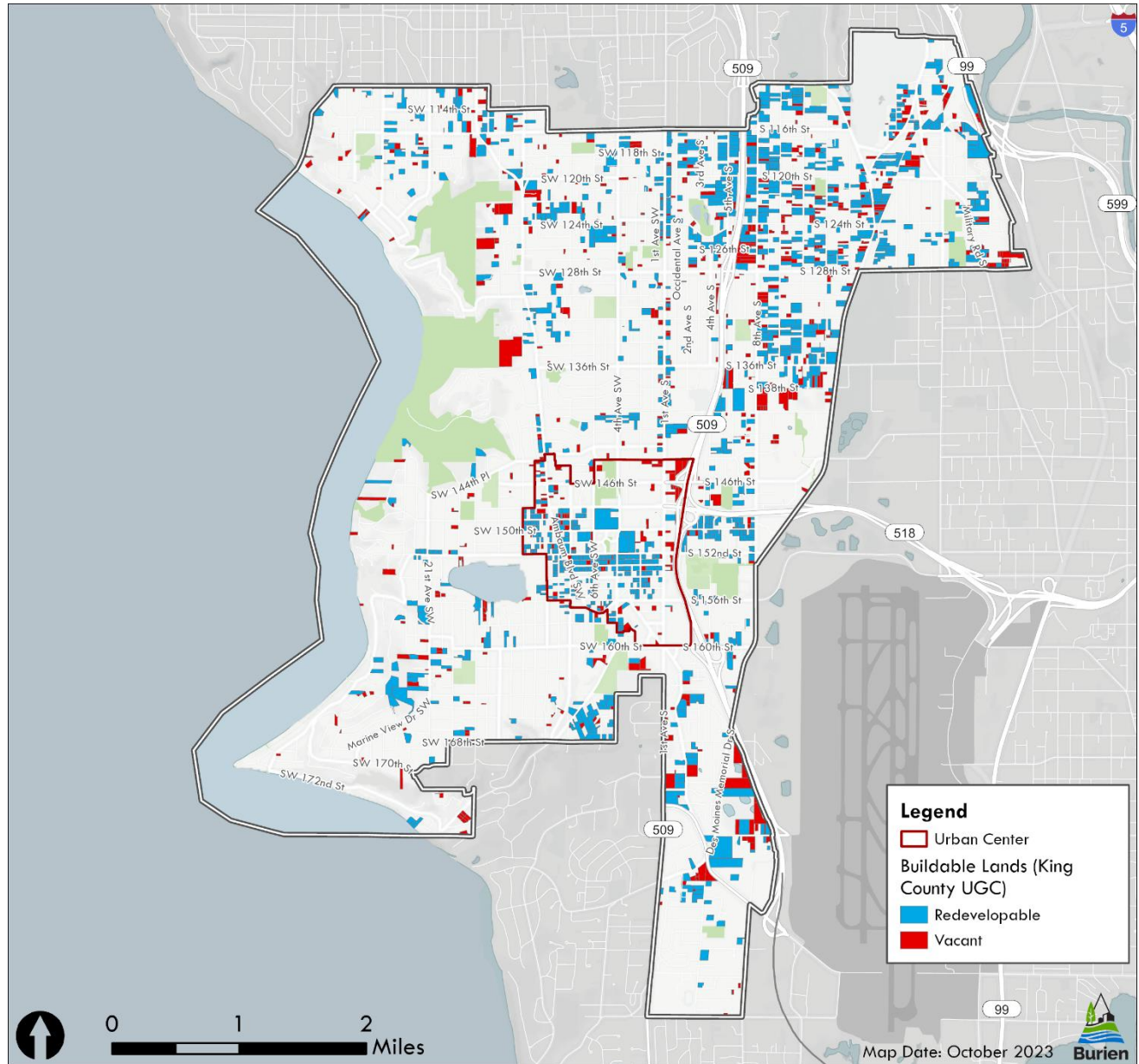
Next Steps

The Alternatives were under review in early 2024. The Planning Commission developed recommendations for a Preferred Alternative, which mixed and matched features of the alternatives under and reflected public input. Targeted zoning code changes would implement the Preferred Alternative in order to meet growth targets. The City Council is scheduled to consider the Comprehensive Plan in fall 2024.

While the Comprehensive Plan and zoning provides capacity for housing and jobs, individual decisions by property owners to develop properties under the plans and codes would still drive trends. The City will monitor the Comprehensive Plan and a progress report is due in 2029 (every 5 years).

Appendix: Land Capacity Assumptions

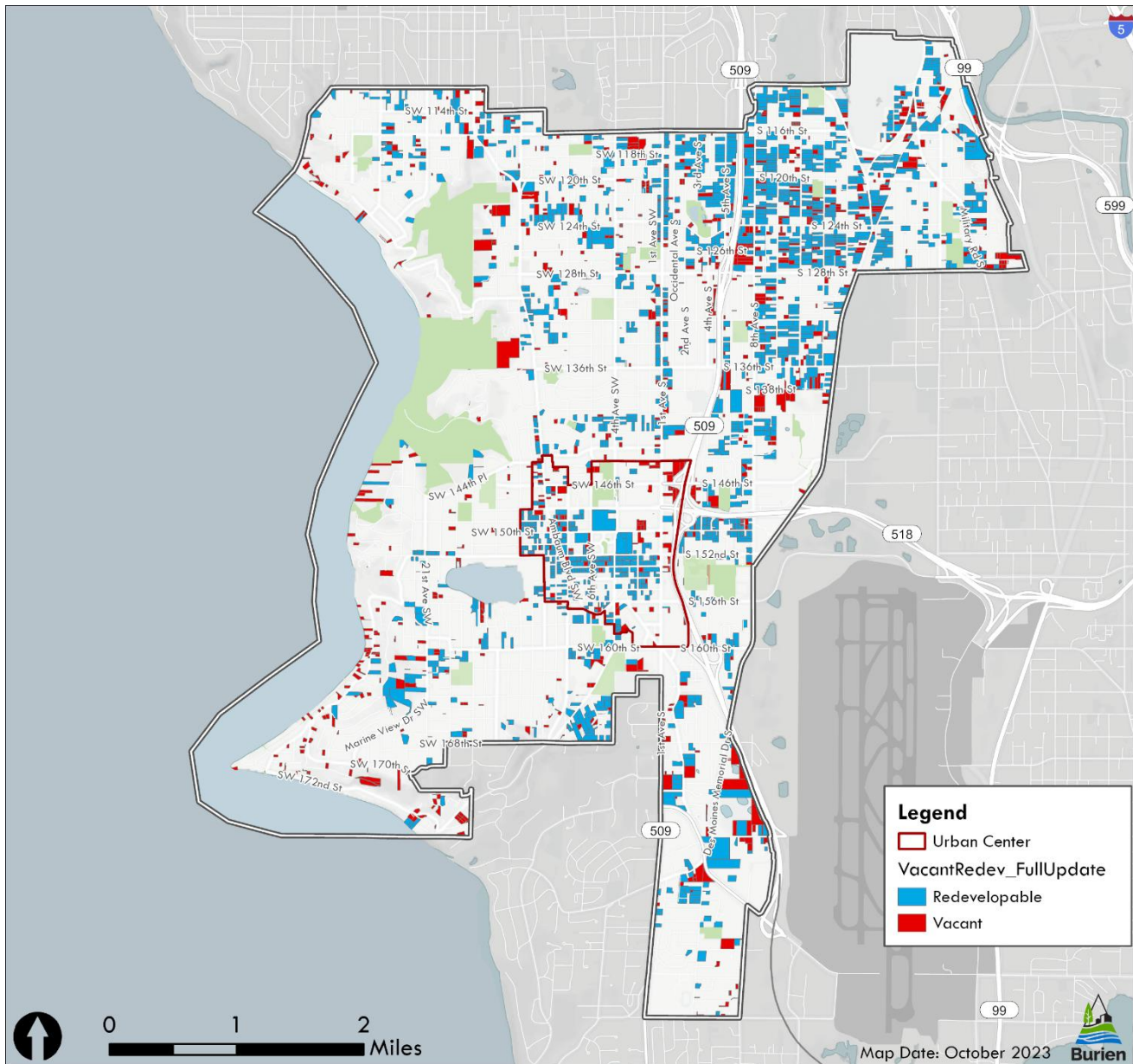
Exhibit 14. Buildable Lands Map (2019)



Sources: King County 2021, BERK 2023.

- Buildable lands include vacant and redevelopable parcels, which were identified through a method of evaluating existing densities relative to planned densities and improvement-to-land value. This data was collected and evaluated in 2018-2019 and published in 2021. It is used in the residential capacity evaluation.

Exhibit 15. Buildable Lands Map with Updated Redevelopable Land (2023)



Sources: King County 2021, King County Assessor 2023, BERK 2023.

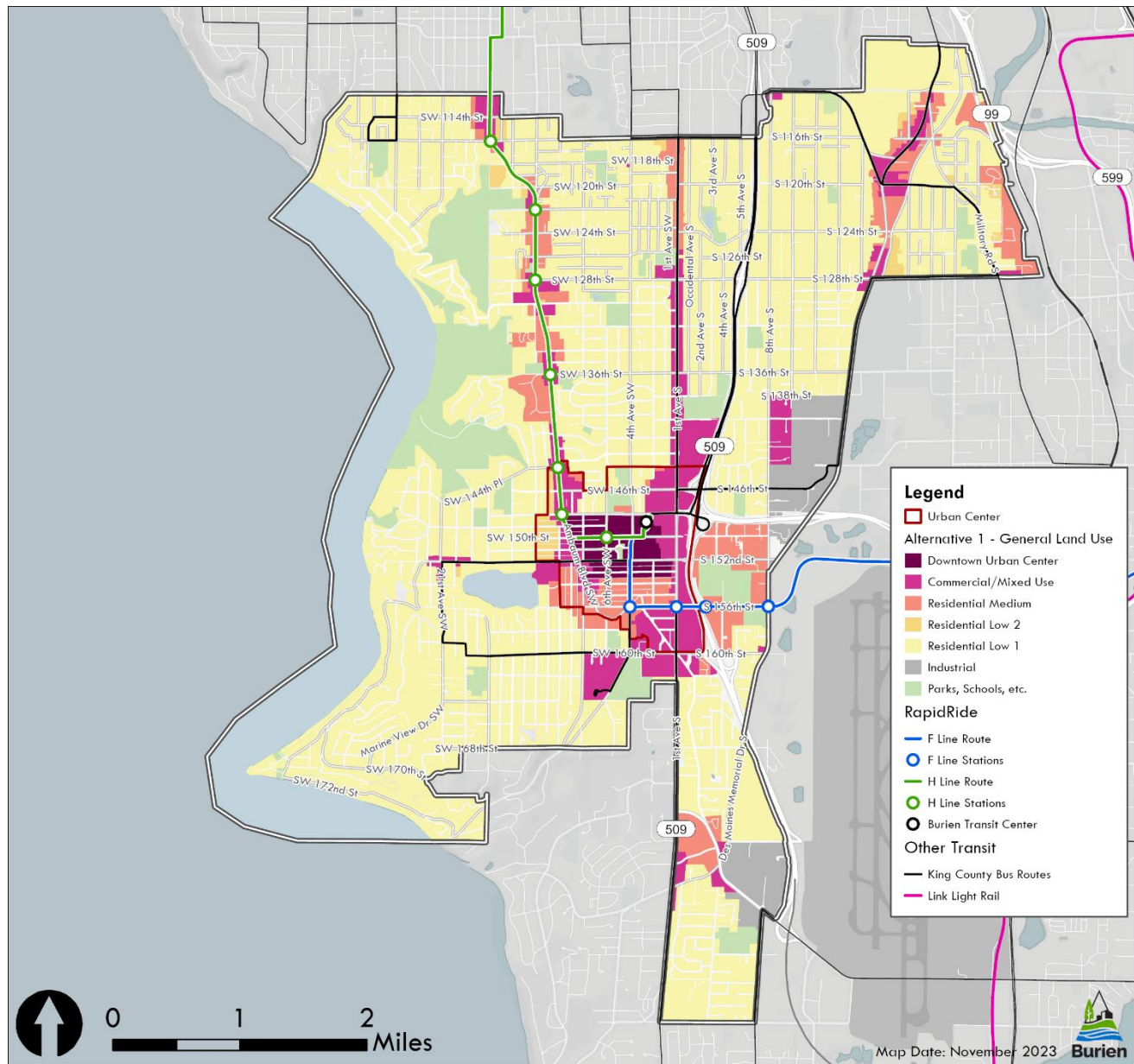
- Updated buildable land map using 2023 King County Assessor data. Lands may have constraints or not be available for development. Redevelopable land recalculated based on an existing density-to-planned density ratio using 2023 assessor data instead of 2019; this is used in the jobs per dwelling unit capacity estimates in non-commercial districts.

Land Capacity: Burien 2044 Alternatives • October 2024



Source: City of Burien, 2020.

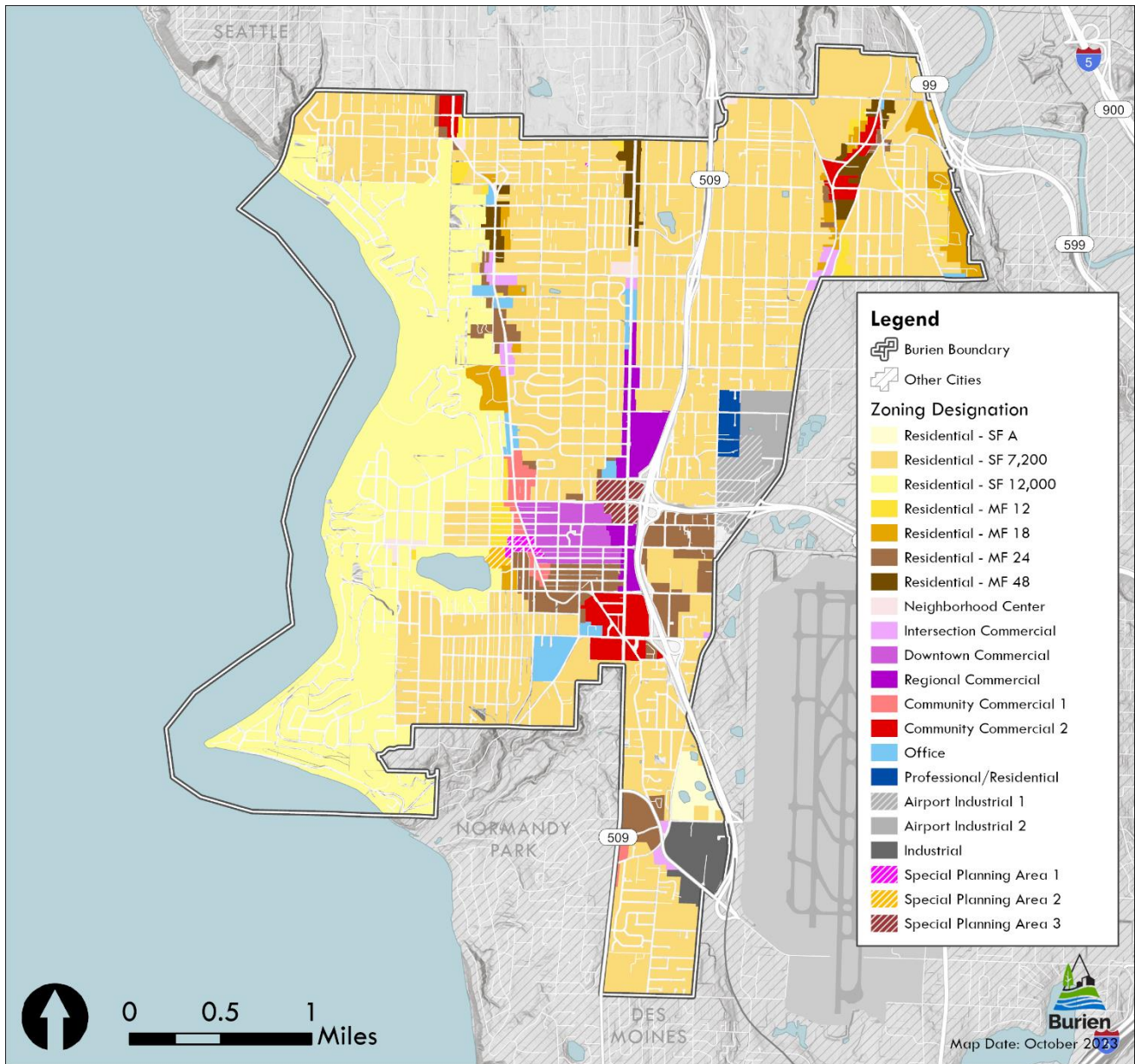
Exhibit 17. Alternative1 No Action (Consolidated No Action Comprehensive Plan Map)



Source: BERK, 2023.

- A map that consolidates the detailed Comprehensive Plan designations of Alternative 1: No Action into simplified designations like Alternatives 2 and 3 for easier comparisons.

Exhibit 18. Burien Zoning Map



Source: City of Burien, 2020.

- Detailed current City of Burien zoning map.

Exhibit 19. Densities: No Action Urban Growth Capacity Report

Zone	Land Use Type	Planned Density (DU/Acre)	Planned Density (FAR)	Achieved Density (DU/Acre)	Achieved Density (FAR)
RS-A	Res	1			
RS-12,000	Res	3.63		6.60	
RS-7,200	Res	6.05		5.59	
RM-12	Res	12		10.84	
RM-18	Res	18		16.67	
RM-24	Res	24		22.95	
RM-48	Res	48		25.67	
CN	Non-Res	12	2.4		
CI	Non-Res		3.2		
DC	Mixed	Unlimited		120.66	0.12
PR	Other	6.05			
CC-1	Mixed	18	2.55		0.22
CC-2	Mixed	24	2.95		0.22
CR	Mixed	24	3.05		0.33
O	Mixed	24/48	3.2		0.13
I	Non-Res	n/a	2.55		
SPA-1 (Old B)	Mixed	24	2.78		
SPA-2 (Navos)	Other				
SPA-3 (Gateway)	Mixed	24	2.725		
AI-1	Mixed	n/a	3.35		0.41
AI-2	Mixed	n/a	3.35		

Sources: City of Burien, King County 2019.

- Assumptions of achieved (based on permits) and planned densities under Alternative 1: No Action, the current plan and zoning.

Exhibit 20. Land Use Designations (Draft January 2024) – Alternatives 2 and 3 and Preferred Alternative

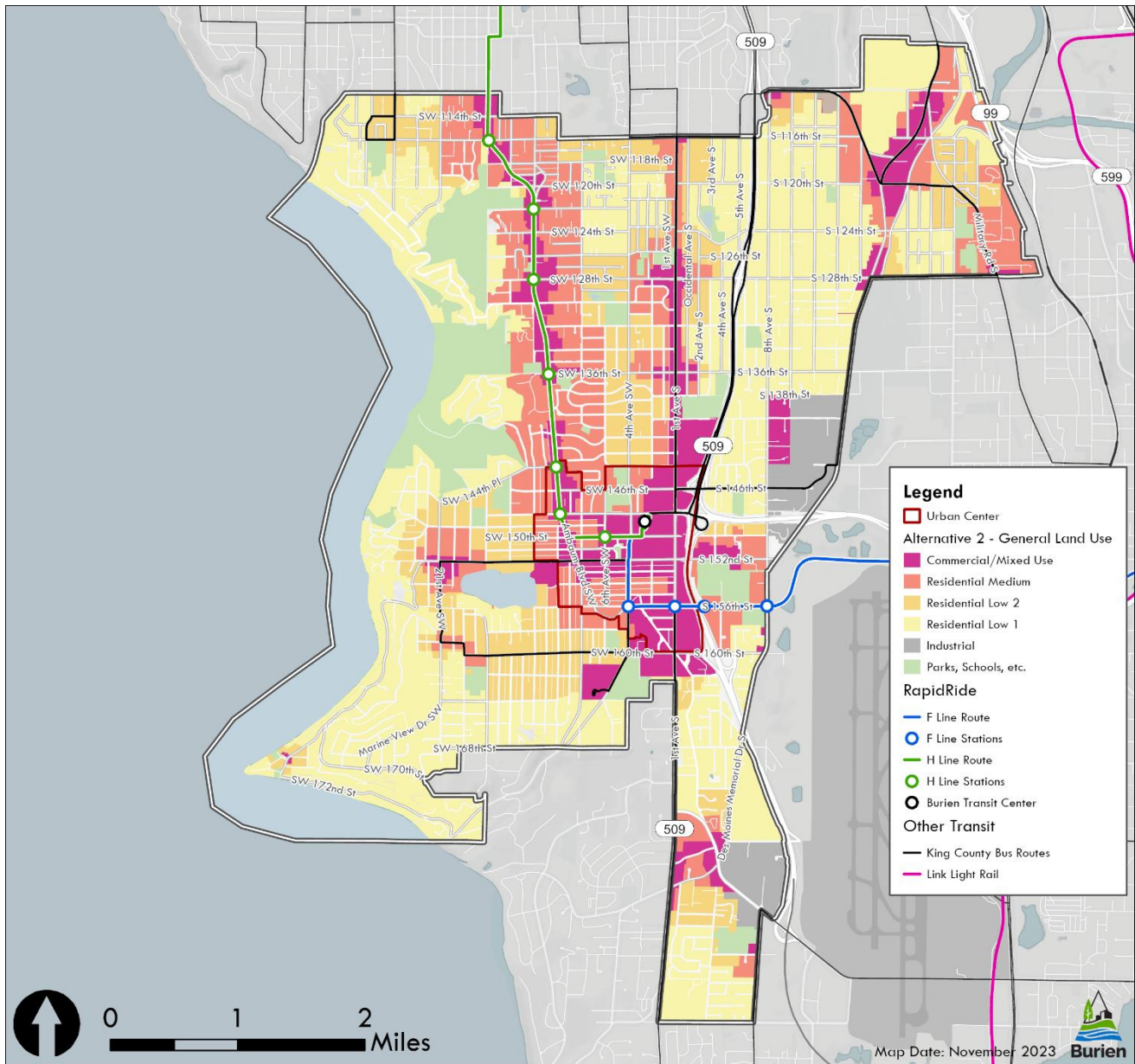
Name	Future Land Use Description
Downtown Urban Center	<u>Purpose:</u> This designation is intended for areas close to and within Burien’s Urban Center, the most active place in Burien. It reinforces downtown as Burien’s civic center with a focus on employment, an urban neighborhood, transit-orientation, arts and culture, and entertainment. Development will be pedestrian-oriented with focus on street level activity and design. <u>Principal uses & intensity:</u> Burien’s most intense mix of commercial, office, residential, mixed use, and civic uses. Development will range from low-, mid-, and high-rise in scale. Active ground floor uses may be required along some streets and encouraged elsewhere. Approximate density: 60-200 units per acre.
Commercial/Mixed Use	<u>Purpose:</u> This designation promotes pedestrian-oriented commercial and mixed-use development in neighborhood centers near transit and/or amenities to provide services, employment, and housing opportunities for nearby residential areas. It is intended to foster centers of activity, reduce automobile trips, and encourage other travel modes. These high intensity areas make use of existing neighborhood anchors, such as groceries, parks, schools, and other business. <u>Principal uses & intensity:</u> A variety of commercial (including services, restaurants, groceries, offices, retail, light manufacturing, general commercial, etc.), mixed-use, residential, and civic uses. This designation also includes hospitals and medical centers. Intensities range from single-story to midrise development. Active ground floor uses may be required along neighborhood main streets and encouraged elsewhere. Approximate density: 40-100 units per acre. Apply a minimum density near transit station areas and transit corridors served by high-capacity or frequent transit.
Residential Medium	<u>Purpose:</u> This designation allows a mix of housing types, including multi-dwelling structures near transit, amenities, and employment centers. It creates a transition from higher intensity areas, such as mixed-use neighborhood centers, to lower intensity residential areas. <u>Principal use & intensity:</u> Primarily multi-story residential buildings, including low-rise and midrise apartments/condominiums, townhouses, and other building types. Some small commercial uses are permitted on the ground floor. Approximate density: 20-80 units per acre.
Residential Low 2	<u>Purpose:</u> This designation provides for moderate-scale multi-dwelling/middle housing development to expand housing options in neighborhoods, especially ownership options. Appropriate locations include areas somewhat close to transit or amenities or lots which have suitable characteristics for more intense middle housing types. <u>Principal uses & intensity:</u> Primarily moderate-scale middle housing types, including a mix of townhouses, multiplexes, courtyard apartments, and detached houses. New development should be harmonious with the scale and pattern of the surrounding neighborhood. Approximate density: 15-40 units per acre.
Residential Low 1	<u>Purpose:</u> This designation allows a low-scale mix of housing types to modestly expand housing choices throughout Burien. <u>Principal uses & intensity:</u> Primarily detached houses with some duplexes, cottage clusters, and other low-scale middle housing types. New development should be harmonious with the scale and pattern of the surrounding neighborhood. Approximate density: 8-20 units per acre.

Name	Future Land Use Description
Industrial	<u>Purpose:</u> This designation is intended for a wide range of employment-oriented, land-intensive uses, such as manufacturing, distribution, flex-tech, and auto sales, in areas with freight access and appropriate conditions for land-intensive uses. This designation is intended to make appropriate use of land impacted by air and noise pollution, such as the NERA. Development should be located and designed to minimize visual, traffic, noise, or other impacts on the surroundings areas. <u>Principal uses & intensity:</u> Primarily warehouses, workshops, light and heavy manufacturing and industrial facilities, processing and distribution, business park and flex-tech, research and development, general service, small office or flexible buildings, and auto sales.
Parks & schools	<u>Purpose:</u> This designation allows for recreational facilities and services that define and enhance the livability of surrounding residential areas and viability of nearby business areas. <u>Principal uses & intensity:</u> Parks, schools, community centers, trails, open spaces, and other public and quasi-public facilities and properties.

Sources: City of Burien; 2023.

- Proposed land use designation categories, descriptions, and densities.

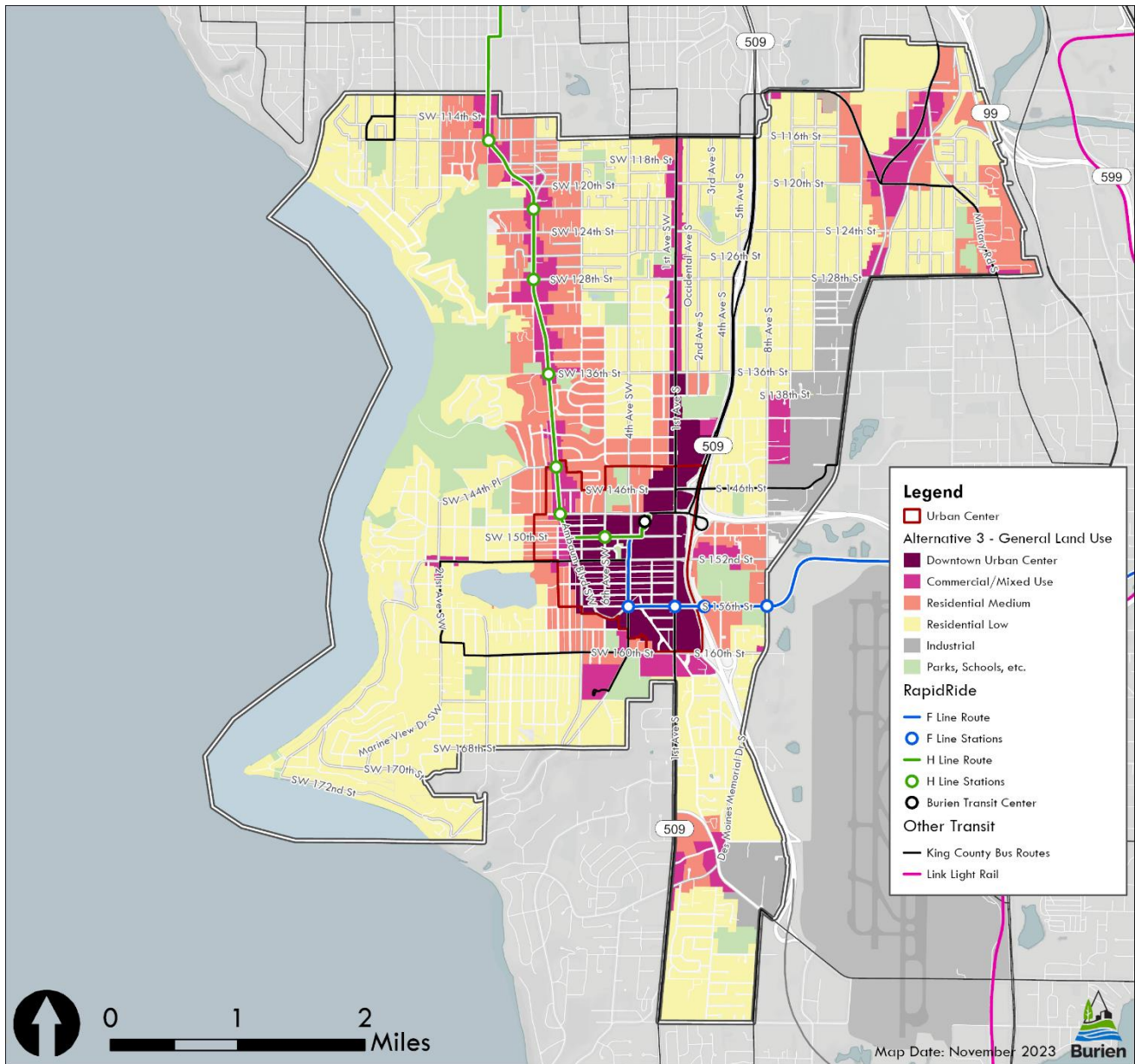
Exhibit 21. Alternative 2 Neighborhood Centers



Source: City of Burien, Makers, BERK, 2023

- Alternative 2: Neighborhood Centers under study in Burien 2044 Draft EIS.

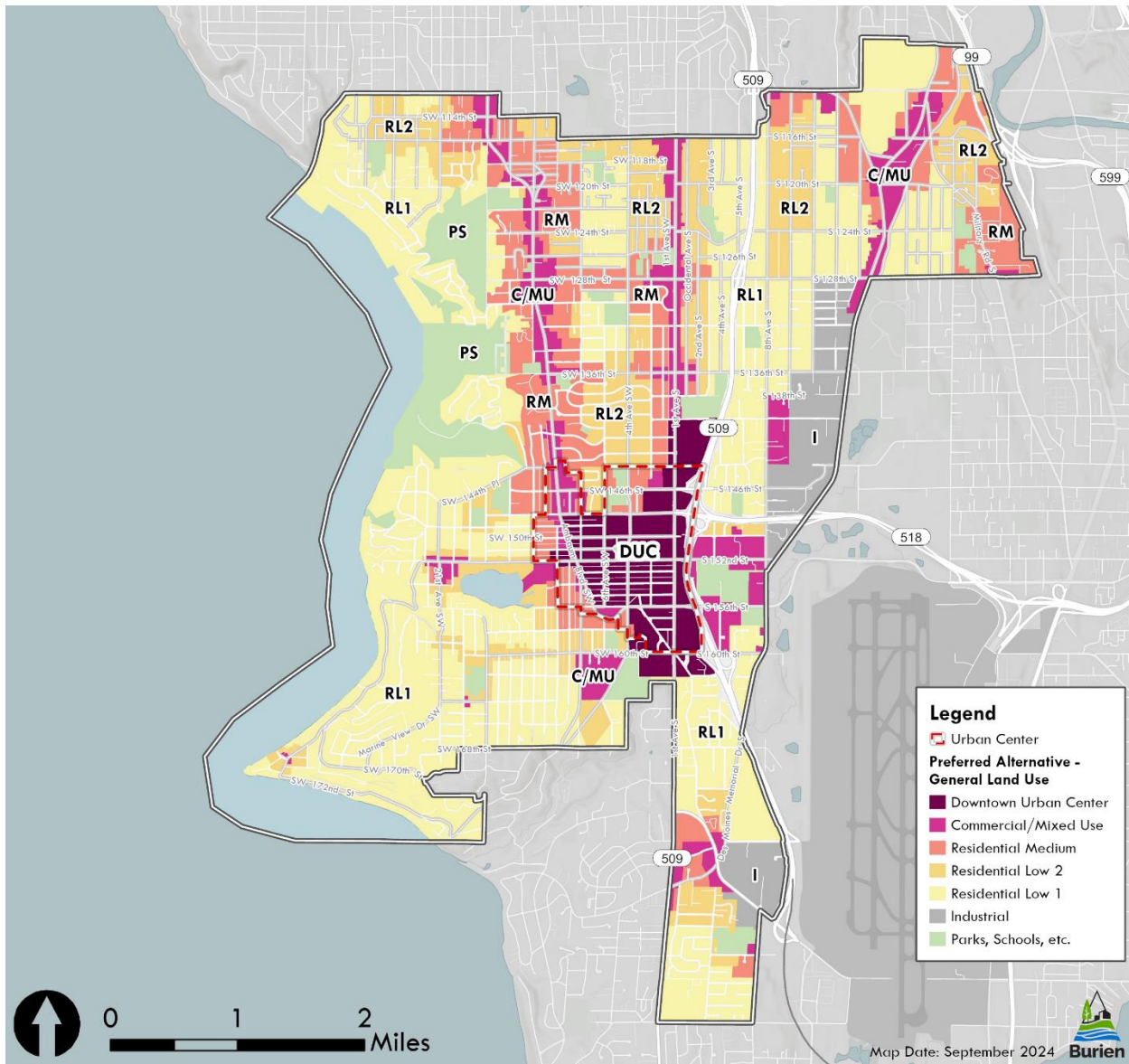
Exhibit 22. Alternative 3 Greater Downtown



Source: City of Burien, MAKERS, BERK, 2023

- Alternative 3: Greater Downtown under study in Burien 2044 Draft EIS.

Exhibit 23. Planning Commission Preferred Alternative – July 3, 2024



Note – the map reflects the July 3, 2024 direction. It includes corrections to some properties identified by staff and updates tracts.

Source: City of Burien, BERK 2024

Exhibit 24. Existing/Proposed Zone Comparison Table – Middle Housing Grant June 2023

	Existing Zones							New Zones				
Zone	RS-A	RS-12000	RS-7200	RM-12	RM-18	RM-24	RM-48	R-1	R-2	R-3	R-4	R-5
Purpose								Low-density residential zone For sensitive and impacted areas	General low-density residential zone Replaces RS-7200 and RS-12000	Moderate density zone near transit, services, centers, etc.	Near services, transit	Near services, transit
Allowed building types for primary units	House	House	House,	TH, apts	TH, apts	TH, apts	TH, apts	Duplex +ADUs, Cottage cluster	Duplex-Triplex, Cottage cluster up to three TH	Du-Fourplex, TH, etc. Courtyard apts on larger lots	Multifamily, TH, middle housing	Multifamily, TH
ADUs allowed	2	2	2					2	2	2	2	2
Mixed Use	No	No	No	No	No	No	No	No, except daycare	No, except daycare	Yes, limited sf	Yes	Yes
Min lot size	43,560	12,000	7,200	3,600	2,400	1,800	1,200	6,000	5,000	3,000	N/A	N/A
Max units per lot								2	3	4		
Floor area ratio**								0.5-0.6	0.5-0.7	0.5-1.0		
Density per acre (courtyard development only)	(1)	(3.6)	(6)	12	18	24	48			30*		
Achieved density (du per acre including ADUs)	3	10.89	18.15					29	52.3			
Parking req	2 per DU	2 per DU	2 per DU	~1.8 per DU	~1.8 per DU	~1.8 per DU	~1.8 per DU	1 per DU	1 per DU	1 per DU	1 per DU	1 per DU
Setback, front (ft)	20	20	20	10	10	10	10	20	15	10	10	10
Setback, interior (ft)	5	5	5	5	5	5	5	5	5	5	5	0
Height (ft)	35	35	35	35	35	35	60-75	35	35	35	35*	65*

Zone	Existing Zones							New Zones				
	RS-A	RS-12000	RS-7200	RM-12	RM-18	RM-24	RM-48	R-1	R-2	R-3	R-4	R-5
Coverage max	20%	35%	35%	60%	60%	70%	70%					
Impervious coverage max	20%	45%	70%	85%	85%	85%	90%	50%	70%	80%		
Affordability bonus								+2 units +0.2 FAR	+2 units +0.2 FAR	+2 units +0.2 FAR	+1 story	+1 story

*Density per acre only applies to courtyard style developments, which are not controlled by FAR.

** FAR scales depending on units per lot, see below.

- Zoning (current and potential) from Middle Housing Study 2023. See R-4 and R-5 modified based on a Preferred Growth Alternative below.
- Greater work on middle housing zones R-1 to R-3 is planned for 2025.

Exhibit 25. Mixed Use and Multifamily Zones Dimensional Standards – Preferred Alternative (July 2024)

DIMENSIONAL STANDARDS (SIMPLIFIED)

	R-4	R-5	MU-1	MU-1 BP	MU-2	MU-2 E	MU-C	MU-CD	MU-DT	MU-A
Minimum density (units/acre) Exemptions: • Nonresidential buildings • Sites with less than 20,000sf GFA (excluding right-of-way and critical areas)	10	20	12	None	30	30	None	12	30	None
Maximum building height * 3-story limit in Pedestrian-Oriented Retail Overlay ** Structures taller than 3-stories within 500' of SR 509 must include measures to mitigate air & noise impacts from freeway	35'	65'	35'	35'	65'	85'	35'	65'	8 stories*	12 stories**
Maximum building height with bonus (see Bonus Heights below)	45'	75'	55'		85'		85'/65'	85'	9 stories	16 stories
Building coverage (maximum)	None	None	None	None	None	None	None	None	None	None
Impervious surface coverage (maximum)	None	None	None	None	None	None	None	None	None	None
Lot area (minimum)	None	None	None	None	None	None	None	None	None	None
Front yard setback * Determined by block frontage standards.	10*	10*	0-10*	0-10*	0-10*	0-10*	0-10*	0-10*	0-10*	0-10*
Interior setback * Determined by design standards.	0-15*	0-15*	0-15*	0-15*	0-15*	0-15*	0-15*	0-15*	0-15*	0-15*

- Proposed dimensional standards with Preferred Alternative. There would not be a maximum density; instead, density would be limited by heights, setbacks, and landscaping.

Land Capacity Assumptions

The following assumptions were applied to the alternatives under study in the Draft Comprehensive Plan and Draft EIS, and the Planning Commission Preferred Alternative.

Exhibit 26. Densities in Dwelling Units per Acre: No Action and Action Alternatives

Land Use Designation	No Action Assumed	Ambaum Boulevard Park (ABP) EIS Assumed	ABP Market Study & Middle Housing Study	Burien 2044: Density Range	Burien 2044: Mid (weighted)	Burien 2044: Optimal (weighted)	Preferred 2044: Mid (weighted)	Preferred 2044: Highrise (weighted)
Commercial/Mixed Use	8-20	80-100	47-250	40-100	50-70 (49.1-56.7)	50-100 (56.1-66.6)	50-70 (57.5)	50-100 (69.2)
Downtown Urban Center	120.66	100-120	47-250	60-200	120	120-150	80-120 (88.6)	100-150 (119.8)
Residential Low	5.6-6.6 10. 9-18.2 inc. ADU	15	29-52.3	8-40	15-20 (15.8)	15-20 (15.8)	15-20 (16.4)	15-20 (17.5)
Residential Medium	10.84-25.67	20-30	100-260	20-60	40-50 (41.0-41.5)	50-80 (52.9-54.6)	40-50 (40.6)	50-80 (51.8)

Market Factors

- ▶ No Action Alternative:
 - Residential: Vacant 16-30% | Redevelopable 17-32%
 - Commercial: Vacant and Redevelopable 10-50%
 - Industrial: Vacant 8% | Redevelopable 10%
- ▶ Action Alternatives:
 - Vacant: 25%
 - Redevelopable: 30%
 - Except: Industrial 10% Vacant, 15% Redevelopable

Rights of Way/Public Purpose

- ▶ No Action Alternative: 5-6%
- ▶ Burien 2044 Action Alternatives: 5%

Commercial/Residential Splits

No Action Alternative:

- ▶ Commercial/Mixed Use: Commercial share 1-75%
- ▶ Industrial: 100%

Action Alternatives: (More small business formation including anti-displacement)

- ▶ Commercial/Mixed Use: Commercial share 25%-100% (Alts 2 and 3 70%-80% weighted average; Preferred 50-60% weighted average)
- ▶ Industrial: 100%

Floor Area Ratios

- ▶ Industrial- All Alternatives: 0.41 (Urban Growth Capacity)
- ▶ Commercial – No Action: 0.12-0.33
- ▶ Commercial – Action Alternatives: 0.3-0.4
- ▶ Residential Areas used Jobs/Housing Unit of 0.15 job/unit per productivity analysis

Employment Densities

- ▶ No Action Alternative
 - Commercial: 650-800 sf/employee
 - Industrial: 1200 sf/employee
- ▶ Action Alternatives
 - Commercial: 250-500 sf/employee
 - Industrial: 600 sf/employee

Exhibit 27. Housing Affordability Assumptions

Exhibit 12. Example of relating zone categories to housing types and income levels served in moderate-cost communities

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Moderate income (>80-120% AMI)	Not typically feasible at scale*	Moderate income (>80-120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Low income (>50-80% AMI)	Extremely low and Very low income (0-50% AMI)	Low income (0-80% AMI) and PSH
ADUs (all zones)	Accessory Dwelling Units on developed residential lots	Low income (>50-80% AMI)	N/A	Low income (>50-80% AMI) – Group with Low-Rise and/or Mid-Rise Multifamily

* See discussion in 3.2 below.

Exhibit 13. Example of relating zone categories to housing types and income levels served in higher-cost communities

Zone category	Typical housing types allowed	Lowest potential income level served		Assumed affordability level for capacity analysis
		Market rate	With subsidies and/or incentives	
Low Density	Detached single family homes	Higher income (>120% AMI)	Not feasible at scale*	Higher income (>120% AMI)
Moderate Density	Townhomes, duplex, triplex, quadplex	Higher income (>120% AMI)	Not typically feasible at scale*	Higher income (>120% AMI)
Low-Rise Multifamily	Walk-up apartments, condominiums (2-3-floors)	Moderate income (>80-120% AMI)	Extremely low, Very low, and Low-income (0-80% AMI)	Low income (0-80% AMI) and PSH
Mid-Rise Multifamily	Apartments, condominiums	Moderate income (>80-120% AMI)	Extremely low, Very low, and Low-income (0-80% AMI)	Low income (0-80% AMI) and PSH
High-Rise/Tower	Apartments, condominiums	Higher income (>120% AMI)	Moderate income (>80-120% AMI)	Moderate income (>80-120% AMI)
ADUs (all zones)	ADUs on developed residential lots	Moderate income (>80-120% AMI)	N/A	Moderate income (>80-120% AMI)

* See discussion in 3.2 below.

- Alternatives 1, 2, and 3 use Moderate Cost frameworks to sort existing or potential land use categories/zoning into income bands. While Alternative 3 and the Preferred Alternative test both mid-rise and high-rise, the high rise development is not considered to change market conditions to a high-cost community.

Exhibit 28. Alternative 1 Residential and Job Capacity – Sorted into Consolidated Future Land Use Categories

Row Labels	Designated Acres	Net Residential Capacity	Net Job Capacity
Commercial/Mixed Use	382	872	398
Downtown Urban Center	74	2,769	438
Industrial	191	-	436
Parks, Schools, etc.	531	-	3
Residential Low 1	3,578	1,376	248
Residential Low 2	50	49	11
Residential Medium	384	1,432	226
(blank)	2	-	-
Grand Total	5,191	6,498	1,761

- Updates King County Urban Growth Capacity Report: There was a formula error in underlying spreadsheets that resulted in misapplication of assumed densities (e.g., RS 7200 density applied to RS 12000, R12 density applied to RS 7200 and so on). Also, updates pipeline development and removes negative residential or negative job results.
- If adding accessory dwelling units +882.

Exhibit 29. Alternative 2 Housing Capacity

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid	Assumed Optimal	Housing Capacity Mid	Housing Capacity Optimal
Commercial/Mixed Use	MED	20	2	40-100	70	80	10	11
	MU-1	371	105		50	50	137	137
	MU-2	201	51		70	100	1,543	2,209
Industrial	I	191	24	n/a	n/a	n/a	n/a	n/a
Parks, Schools, etc.	PRS	531	n/a	n/a	n/a	n/a	n/a	n/a
Residential Low 1	R1/R2	2,222	439	8-20	15	15	3,530	3,530
Residential Low 2	R3	720	80	15-40	20	20	843	843
Residential Medium	R4	850	159	20-60	40	50	3,297	4,204
	R5	86	29		50	80	449	936
Grand Total		5,191	888				9,809	11,870

- If adding accessory dwelling units + 1,042. However, RL 1 and RL 2 density by zone considers middle housing.

Exhibit 30. Alternative 2 Employment/Job Capacity

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Commercial Share	Jobs Mid (Mid Density, 2019 Base)	Jobs High (Optimal Density, 2023 Base)
Commercial/Mixed Use	MED	20	2	0.90	53	83
	MU-1	371	105	0.90	21	196
	MU-2	201	51	0.25	231	365
Industrial	I	191	24	1.00	579	579
Parks, Schools, etc.	PRS	531	n/a	n/a	n/a	n/a
Residential Low 1	R1/R2	2,222	439	0.15 job/du	530	653
Residential Low 2	R3	720	80	0.15 job/du	126	176
Residential Medium	R4	850	159	0.15 job/du	495	763
	R5	86	29	0.15 job/du	67	146
Grand Total		5,191	888		2,102	2,960

Exhibit 31. Alternative 3 Housing Capacity

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid	Assumed Optimal	Housing Capacity Mid	Housing Capacity Optimal
Commercial/Mixed Use	C	41	12	40-100	0	0	0	0
	MED	22	3		70	80	11	13
	MU-1	203	63		50	50	0	0
	MU-2	92	22		70	100	666	956
Downtown Urban Center	MUUC	260	89	60-200	120	120-150	1,244	1,244- 3,677
Industrial	I	270	52	n/a	n/a	n/a	0	-
Parks, Schools, etc.	PRS	530	0	n/a	n/a	n/a	0	-
Residential Low	R1/R2	2,917	494	8-40	15-20	15-20	3,721	5,235
Residential Medium	R4	789	138	20-60	40	50	2,776	3,559
	R5	65	15		50	80	399	667
Grand Total		5,191	888				8,817	11,674- 14,107

- High range with optimal densities assumes high-rise in parts of Downtown and vicinity on First Avenue.
- If adding accessory dwelling units + 1,027. However, RL density by zone considers middle housing.

Exhibit 32. Alternative 3 Employment/Job Capacity

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Commercial Share	Jobs Mid (Mid Density, 2019 Base)	Jobs Optimal (2023 Base)
Commercial/Mixed Use	C	41	12	1.00	154	182
	MED	22	3	0.90	53	83
	MU-1	203	63	0.90	659	951
	MU-2	92	22	0.25	100	162
Downtown Urban Center	MUUC	260	89	0.75	187	200- 585
Industrial	I	270	52	1.00	1244	1326
Parks, Schools, etc.	PRS	530	0	0.00	0	0
Residential Low	R1/R2	2,917	494	0.15 job/du	558	1029
Residential Medium	R4	789	138	0.15 job/du	416	694
	R5	65	15	0.15 job/du	60	103
Grand Total		5,191	888		3,431	4,730- 5,115

- High range with optimal densities assumes high-rise in parts of Downtown and vicinity on First Avenue.

Exhibit 33. Preferred Alternative Housing Capacity

Land Use Designation	Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid	Assumed Optimal	Housing Capacity Mid	Housing Capacity Highrise
Commercial/Mixed Use	SPA-2	9.9	0	40-100*	70	80	-	-
	MU-C	15.2	1		0	0	-	-
	MU-1	217.9	47		50	50	-	-
	MU-1 BP	28.4	11		50	50	4	3.7
	MU-2	171.7	41		70	100	1,335	1,947.7
	MU-2 E	20.3	5		70	100	24	34.4
Downtown Urban Center	MU-2	49.0	9	60-200	80	120	350	534.1
	MU-2 CD	24.1	7		80	100	57	79.0
	MU-A	113.2	18		120	150	1,180	1,475.4
	MU-DT	55.9	22		80	120	313	603.9
	MU-DT P	23.6	21		80	100	852	1,067.0
Industrial	I	263.8	48	0	0	0		
Residential Low 1	R1/R2	2,195.5	322	8-20	15	16.75	2,813	3,187.7
Residential Low 2	R3	757.2	135	15-40	20	20	1,560	1,560.4
Residential Medium	R4	679.7	112	20-80	40	50	2,727	3,467.1
Residential Medium	R5	34.5	6		50	80	187	314.0
Parks, Schools, etc.	PRS	531.1						
Total		5,191	805				11,402	14,274

*Up to 120 along or within Urban Center in high-rise.

- High range with optimal densities assumes high-rise in parts of Downtown and vicinity on First Avenue.
- If adding accessory dwelling units + 1,056. However, RL density by zone considers middle housing.

Exhibit 34. Preferred Alternative Employment/Job Capacity

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Commercial Share*	Weighted	Jobs Mid (2019 Base)	Jobs Highrise (2023 Base)
Commercial/Mixed Use	SPA-2	9.9	0	0.90	0.57	0	0
	MU-C	15.2	1	1.00		0	0
	MU-1	217.9	47	0.90		802	802
	MU-1 BP	28.4	11	0.90		166	166
	MU-2	171.7	41	0.25		250	365
	MU-2 E	20.3	5	0.90		28	30
Downtown Urban Center	MU-2	49.0	9	0.75		403	432
	MU-2 CD	24.1	7	0.75		206	209
	MU-A	113.2	18	0.20		178	223
	MU-DT	55.9	22	0.50		55	102
	MU-DT P	23.6	21	0.20		128	160
Industrial	I	263.8	48	1.00		1,129	1,129
Residential Low 1	R1/R2	2,195.5	322	0.15		529	600
Residential Low 2	R3	757.2	135	0.15		297	297
Residential Medium	R4	679.7	112	0.15		509	648
Residential Medium	R5	34.5	6	0.15		0	
Parks, Schools, etc.	PRS	531.1				0	
Total		5,191	805			4,677	5,162

*Share on buildable land. Some individual sites may have greater shares of jobs and less housing or vice versa. A mid-rise building with ground floor retail would have about 0.2 – 0.25 floor area ratio.

- High range with assumes high-rise in parts of Downtown and vicinity on First Avenue.

Exhibit 35. Alternative 2 Housing Affordability Assumptions – Moderate Cost Community

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid (du/ac)	Assumed Optimal (du/ac)	Residential Type	Affordability Level (AMI)
Commercial/Mixed Use	MED	20	2	40-100	70	80	Mid-Rise	20% to 0-80% and 80% to 80-120%
	MU-1	371	105		50	50	Mid-Rise	
	MU-2	201	51		70	100	Mid-Rise	
Industrial	I	191	24	n/a	n/a	n/a	n/a	n/a
Parks, Schools, etc.	PRS	531	0	n/a	n/a	n/a	n/a	n/a
Residential Low 1	R1/R2	2,222	439	8-20	15	15	Low Density	120%+
Residential Low 2	R3	720	80	15-40	20	20	Moderate Density	80-120%
Residential Medium	R4	850	159	20-60	40	50	Low-Rise	0-80%
	R5	86	29		50	80	Mid-Rise	20% to 0-80% and 80% to 80-120%
Grand Total		5,191	888					

► See Exhibit 27 for Moderate Cost Framework applied to Alternative 2.

Exhibit 36. Alternative 3 Housing Affordability Assumptions – Moderate Cost Community

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid (du/ac)	Assumed Optimal (du/ac)	Residential Type	Affordability Level (AMI)
Commercial/Mixed Use	C	41	12	40-100	0	0	n/a	n/a
	MED	22	3		70	80	Mid-Rise	20% to 0-80% and 80% to 80-120%
	MU-1	203	63		50	50	Mid-Rise	
	MU-2	92	22		70	100	Mid-Rise	
Downtown Urban Center	MUUC	260	89	60-200	120	120-150	Mid-Rise - High Rise	Same as above
Industrial	I	270	52	n/a	n/a	n/a	n/a	n/a

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid (du/ac)	Assumed Optimal (du/ac)	Residential Type	Affordability Level (AMI)
Parks, Schools, etc.	PRS	530	0	n/a	n/a	n/a	n/a	n/a
Residential Low	R1/R2	2,917	494	8-40	15-20	15-20	Low Density	120%+
Residential Medium	R4	789	138	20-60	40	50	Low-Rise	0-80%
	R5	65	15		50	80	Mid-Rise	20% to 0-80% and 80% to 80-120%
Grand Total		5,190	888					

► See Exhibit 27 for Moderate Cost Framework applied to Alternative 3.

Exhibit 37. Preferred Alternative: Housing Affordability Assumptions – Moderate Cost Community

Land Use Designation	Implementing Zones	Designated Acres	Buildable Acres	Density Range (du/ac)	Assumed Mid	Assumed Hi	Residential Category	Affordability
Commercial/Mixed Use	SPA-2	9.9	0	40-100*	70	80	Mid-Rise	30-80%, 80-120%
	MU-C	15.2	1		0	0	--	
	MU-1	217.9	47		50	50	Mid-Rise	
	MU-1 BP	28.4	11		50	50	Mid-Rise	
	MU-2	171.7	41		70	100	Mid-Rise	
	MU-2 E	20.3	5		70	100	Mid-Rise	
Downtown Urban Center	MU-2	49.0	9	60-200	80	120	Mid-Rise	30-80%, 80-120%*
	MU-2 CD	24.1	7		80	100	Mid-Rise	
	MU-A	113.2	18		120	150	High-Rise	
	MU-DT	55.9	22		80	120	Mid-Rise	
	MU-DT P	23.6	21		80	100	Mid-Rise	
Industrial	I	263.8	48	0	0	0		
Residential Low 1	R1/R2	2,195.5	322	8-20	15	16.5	Low Density	120%+
Residential Low 2	R3	757.2	135	15-40	20	20	Moderate Density	80-120%*
Residential Medium	R4	679.7	112	20-80	40	50	Low-Rise	30-80%
Residential Medium	R5	34.5	6		50	80	Mid-Rise	30-80%, 80-120%
Parks, Schools, etc.	PRS	531.1			0	0	n/a	n/a

* 10% of units included in 120%+ in mid density capacity.

► See Exhibit 27 for Moderate Cost Framework applied to the Preferred Alternative.

Exhibit 38. Accessory Dwelling Unit Assumptions

Alternative	Eligible Lots	% Deduction	Lots Available	Estimated	Added to Capacity
Alternative 1: No Action	12,598	93%	882	882	Mid: No Optimal: Yes 0-80: 50% 80-120+: 50%
Alt. 2: Neighborhood Center	9,926	93%	695	1,042 (1.5 per lot)	No
Alt. 3: Greater Downtown	9,785	93%	685	1,027 (1.5 per lot)	No
Preferred Alternative	10,054	93%	704	1,056 (1.5 per lot)	No

- ADUs represented 7% of permits. Thus 7% of lots are assumed “available” in chart. However, results for alternatives are shown with and without ADUs.

Exhibit 39. Affordable Housing Mix and Target Achievement – Mid-Range Densities

Housing Unit Affordability	0-80%	80-120%	120%+	Total
Alt 1 New Housing Needed	3,134	1,224	3,142	7,500
Alt 1 Capacity	2,434	2,677	1,387	6,498
Alt 1 Surplus or Deficit*	(700)	1,453	(1,755)	(1,002)
Alt 2 New Housing Needed	3,134	1,224	3,142	7,500
Alt 2 Capacity	3,725	2,554	3,530	9,809
Alt 2 Surplus or Deficit	591	1,330	388	2,309
Alt 3 New Housing Needed	3,134	1,224	3,142	7,500
Alt 3 Capacity	3,240	1,856	3,721	8,817
Alt 3 Surplus or Deficit	106	632	579	1,317
Preferred New Housing Needed	3,134	1,224	3,142	7,500
Preferred Capacity	3,587	5,001	2,813	11,402
Preferred Surplus or Deficit	453	3,777	(329)	3,902

Source: BERK 2023 and 2024.

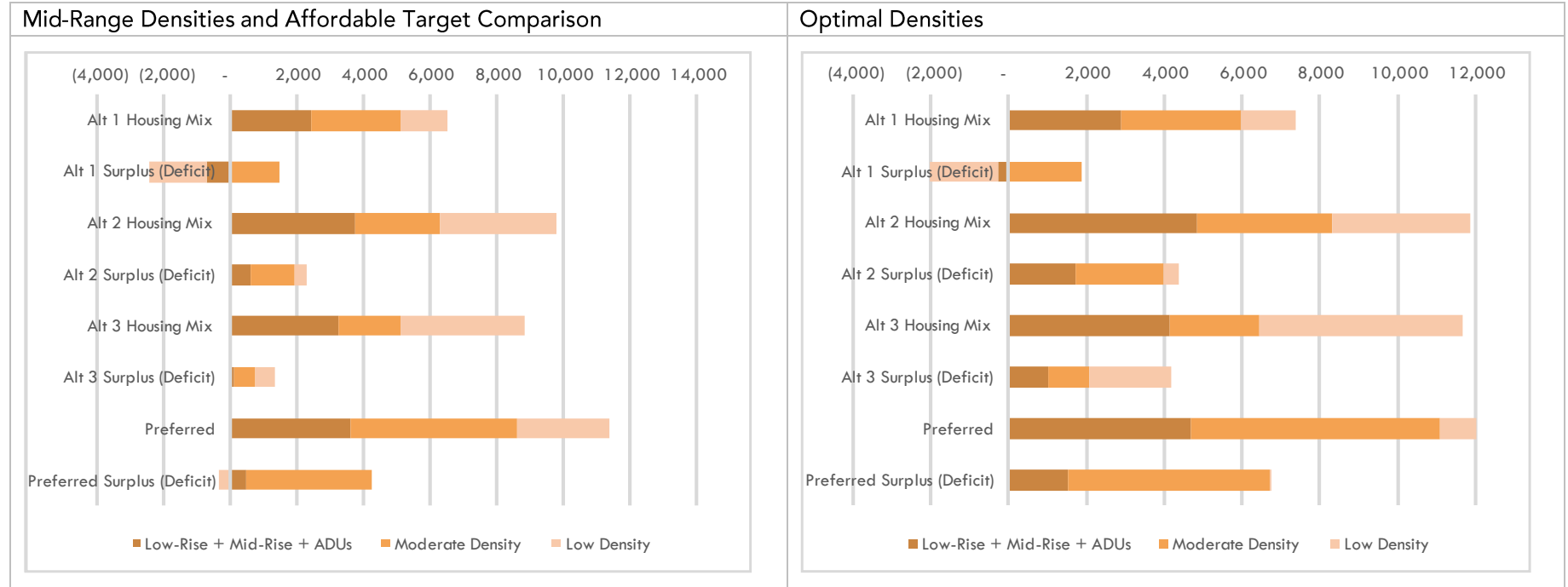
Exhibit 40. Affordable Housing Mix and Target Achievement – Optimal and Highrise Densities

Housing Unit Affordability	0-80%	80-120%	120%+	Total
Alt 1 New Housing Needed	3,134	1,224	3,142	7,500
Alt 1 Capacity	2,875	3,118	1,387	7,380
Alt 1 Surplus or Deficit*	(259)	1,894	(1,755)	(120)
Alt 2 New Housing Needed	3,134	1,224	3,142	7,500
Alt 2 Capacity	4,863	3,477	3,530	11,870
Alt 2 Surplus or Deficit	1,729	2,253	388	4,370
Alt 3 New Housing Needed	3,134	1,224	3,142	7,500
Alt 3 Capacity	4,135	2,304	5,235	11,674
Alt 3 Surplus or Deficit	1,001	1,080	2,093	4,174
Alt 3 New Housing Needed	3,134	1,224	3,142	7,500
Alt 3 Capacity	4,621	4,251	5,235	14,107
Alt 3 Surplus or Deficit (Highrise)	1,487	3,027	2,093	6,607
Preferred New Housing Needed	3,134	1,224	3,142	7,500
Preferred Capacity	4,595	6,046	3,184	13,825
Preferred Surplus or Deficit	1,461	4,822	42	6,325
Preferred New Housing Needed	3,134	1,224	3,142	7,500
Preferred Capacity	4,679	6,408	3,188	14,274
Preferred Surplus or Deficit (Highrise)	1,545	5,184	46	6,774

Source: BERK 2023 and 2024.

- *Reduced deficit if adding in accessory dwelling unit assumption – 7% of new permits per current trends. See Exhibit 40.

Exhibit 41. Graphs Mid-Range and Optimal Densities



Source: BERK 2023.

- Mid-Range Densities for No Action do not include ADUs on top of land capacity following the Urban Growth Capacity Report methodology. Optimal densities include ADUs for No Action and reduce the deficit.

Exhibit 42. Job Productivity and Zones: 2023

NAICS Sector	Businesses			Employment		
	Commercial	Industrial	Residential	Commercial	Industrial	Residential
	Zones	Zones	Zones	Zones	Zones	Zones
Accommodation and Food Services	144	1	12	1,410	8	106
Administrative, Support, Waste Management, Remediation Services	27		32	154		92
Agriculture, Forestry, Fishing and Hunting			1			3
Arts, Entertainment, and Recreation	20		20	127		96
Construction	52	6	88	420	33	340
Educational Services	31	2	30	437	70	1,038
Finance and Insurance	75	1	12	261	0	80
Health Care and Social Assistance	172	2	38	2,443	24	874
Information	19		7	127		117
Management of Companies and Enterprises			1			3
Manufacturing	22		21	185		65
Other	59	3	51	79	12	44
Other Services (except Public Administration)	182	5	72	1,229	69	340
Professional, Scientific, and Technical Services	91	4	53	418	23	387
Public Administration	25	2	3	660	50	61
Real Estate and Rental and Leasing	52	5	35	462	11	86
Retail Trade	209	1	35	2,115	2	126
Transportation and Warehousing	15	8	18	230	76	60
Utilities	1		2	8		10
Wholesale Trade	20	4	13	130	25	83
Totals	1,216	44	544	10,895	403	4,011
Excluding Education						2,973

Source: Heartland, 2023.

Exhibit 43. Housing Units in Burien 2023

Housing – Burien: 2023 OFM			
2023 Total Housing Units	2023 One Unit Housing Units	2023 Two or More Unit Housing Units	2023 Mobile Homes and Specials
21,065	12,796	8,258	11

Source: State of Washington Office of Financial Management, OFM, 2023.

Exhibit 44. Job Rate in Residential Zones

Job Rate – All Dwellings and all Residential Zone Jobs excluding Education	$2,973 \div 21,065 = 0.14$
Job Rate – Excluding Residential Units in Commercial Zones	$2,973 \div 20,205 (21,065 - 860) = 0.15$
Residential Sq Ft in Commercial Zones	774,000
@900 SF/DU – dwelling units excluded	860

Source: Heartland, 2023; BERK, 2023.

- Due to the high share of businesses and jobs in the Residential zones, and the need to consider the achievement of job targets, Alternative 3 applies the observed rate of jobs per dwelling unit, excluding dwellings in Commercial zones.

D Draft Planned Action Ordinances

Ambaum Corridor & Boulevard Park Community Plan

SEPA Planned Action

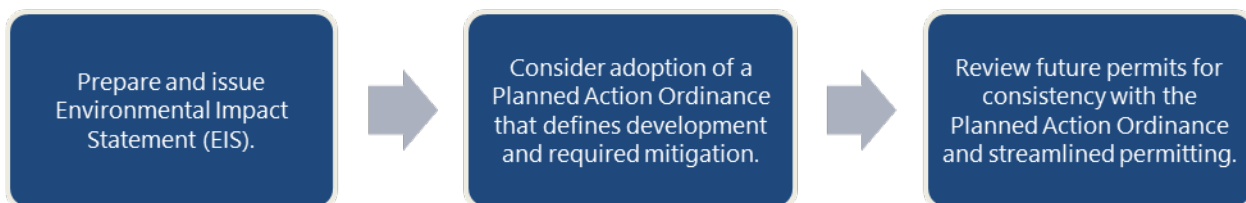
The State Environmental Policy Act (SEPA) requires most major development projects and planning projects to evaluate potential environmental impacts of the proposal. The SEPA "Planned Action" process is a special type of environmental review that allows agencies to analyze impacts and determine mitigation on an area-wide basis rather than project by project. The Planned Action process is typically used in the creation of a neighborhood plan where there are common goals and regulations for the area.

SEPA provides the designation of a specific area and development types as a planned action (see RCW 43.21c.440 and WAC 197-11-164 to 172). This designation shifts the environmental review of a project from permit application to an earlier phase in the planning process. By conducting more detailed environmental review during an area-wide planning process, a more streamlined environmental review can be achieved at the project stage. Early environmental review can also provide for a more comprehensive assessment of potential impacts of future development and greater certainty for project applicants and the public regarding environmental impacts and required mitigation.

The planned action designation process is initiated when a jurisdiction prepares a planned action environmental impact statement (EIS) that addresses the likely significant adverse environmental impacts of the proposal (such as a subarea plan or master planned development). After completing the EIS, the jurisdiction may adopt a planned action ordinance that designates the applicable area, qualified development, and required mitigation. Future planned action development projects would be allowed if they meet or exceed proposed land use and environmental performance standards in the planned action ordinance. See RCW 43.21C.440, WAC 197-11-164 and 168 for requirements and restrictions on the designation of planned actions.

A diagram of the Planned Action process is included in Exhibit 1.

Exhibit 1. Planned Action Process



The Ambaum Corridor and Boulevard Park Community Plan Area was evaluated in an EIS, completed with the issuance of a Final EIS on April 6, 2023. A range of alternatives were evaluated and mitigation

measures were developed. This document provides an overview of the Ambaum Corridor and Boulevard Park Draft Planned Action Ordinance that incorporates the mitigation measures.

Public comment was addressed in several stages to date. A community meeting was held during a 21-day EIS scoping period in July 2022. A 45-day comment period was held with the Draft EIS when issued on December 15, 2022. The Final EIS provided review of a preferred alternative in the range of the Draft EIS alternatives, and provided responses to comments. Prior to finalizing the Planned Action Ordinance it would undergo a public hearing with the Planning Commission. The City may develop an alternative that is similar to or blends features of multiple alternatives and is in the range of the analysis. As part of the Burien 2044 Comprehensive Plan Update Draft EIS the subareas were considered and development in the subareas were identified to help understand the cumulative growth potential in the city. The environmental impact evaluation showed similar results for transportation and other topics and the ABP EIS mitigation continues to apply.

WHAT IS A PLANNED ACTION PROJECT?

What qualifies as a Planned Action Project is described in the Planned Action Ordinance, and includes topics such as the uses, growth levels, etc. When a project is submitted for development permits, the City reviews the project to see that it is consistent with the Planned Action Ordinance. If the impacts were adequately addressed in the EIS and the project includes any conditions or mitigation required in the Ordinance, it can be approved as a "Planned Action" project. The SEPA process is done and there are no additional SEPA public notice requirements.

DOES THIS EXEMPT A PLANNED ACTION PROJECT FROM MEETING OTHER REQUIREMENTS?

No. During the permitting process, a proposal is still required to submit a SEPA checklist explaining project impacts. If the City determines that a proposal will have significant probable environmental impacts that were not addressed in the EIS during the area planning stage, the proposal won't qualify as a Planned Action. It would be required to go through the normal SEPA environmental review. Also, a Planned Action project must still be analyzed for consistency with City plans and development regulations. Projects must comply with hook-up and permit fees and meet other City requirements. Additional conditions may be imposed through the normal land use permit reviews.

What is the benefit of a Planned Action Ordinance?

The Planned Action process:

- Allows agencies to identify the cumulative impacts of all anticipated development within an area.
- Allows the City to evaluate and anticipate impacts associated with the build out in advance.
- Allows a more streamlined environmental review process at the project permitting stage.
- Reduces permit processing time.
- Provides more certainty for developers about what mitigation (and potential costs) will be required and more certainty for the community about the vision for the area and expected requirements.

Preliminary Planned Action Ordinance Contents

The proposed draft Planned Action Ordinance (PAO) includes the following sections:

- Recitals: The recitals identify facts and procedures the City followed in developing the PAO.
- Purpose: The overall purposes are to streamline and expedite the land use permit review process in the PAO and ensure that environmental analysis, land use plans, development regulations, City codes and ordinances together with the mitigation measures in the Planned Action EIS mitigate environmental impacts.
- Findings: The findings indicate the PAO meets the criteria in SEPA Rules.
- Procedures and Criteria for Evaluating and Determining Planned Action Projects within Planned Action Area: This section establishes thresholds for growth, land use, and transportation procedures. This section also establishes criteria by which the City would review planned action applications.
- Monitoring and Review: Establishes a review process to monitor the progress of the Planned Action.
- Exhibit A: Identifies the boundary of the Planned Action Area.
- Exhibit B: Identifies Planned Action EIS Mitigation Measures that apply to new development. Mitigation addresses natural and built environment topics such as water quality and public services and utilities.

CITY OF BURIEN, WASHINGTON

ORDINANCE NO. 845

**AN ORDINANCE OF THE CITY OF BURIEN, WASHINGTON, RELATING TO
ESTABLISHING A PLANNED ACTION FOR THE AMBAUM CORRIDOR AND
BOULEVARD PARK COMMUNITY PLAN AREA PROVIDING FOR SEVERABILITY
AND ESTABLISHING AN EFFECTIVE DATE.**

WHEREAS, the State Environmental Policy Act (SEPA) and its implementing regulations provide for the integration of environmental review with land use planning and project review through the designation of planned actions by jurisdictions planning under the Growth Management Act (GMA), including the City of Burien (Burien);

WHEREAS, Section 43.21C.440 of the Revised Code of Washington (RCW), Sections 197-11-164 through 172 of the Washington Administrative Code (WAC) allow for and govern the adoption and application of a planned action designation under SEPA;

WHEREAS, Burien has adopted SEPA Rules regarding Planned Actions in Burien Municipal Code (BMC) 14.10.050;

WHEREAS, the designation of a planned action expedites the permitting process for projects of which the impacts have been previously addressed in an environmental impact statement (EIS);

WHEREAS, a subarea of Burien consisting of the Ambaum Corridor and Boulevard Park Community Plan Area, as depicted on the map attached hereto as Exhibit A and incorporated herein by this reference, has been identified as a planned action area for future redevelopment into a mixed-use center (Planned Action Area);

WHEREAS, the Burien City Council adopted Ordinance 847 amending its Comprehensive Plan and adopting the Ambaum Corridor and Boulevard Park Community Plan as an element of the Comprehensive Plan to guide development within the Planned Action Area;

WHEREAS, the Burien City Council adopted Ordinance 849 addressing the Zoning Map, Zoning Code Amendments, and design guidelines to regulate development within the Planned Action Area;

WHEREAS, after public participation and coordination with affected parties, Burien, as lead SEPA agency, issued the October 18, 2024 (FEIS) *Ambaum Corridor and Boulevard Park Community Plan Area Final Supplemental Environmental Impact Statement*, which identifies the impacts and mitigation measures associated with planned development in the Future Planned Action Area;

WHEREAS, on October 28, 2024, the Burien City Council amended its Comprehensive Plan to adopt the Ambaum Corridor and Boulevard Park Community Plan Area to guide development within the Future Planned Action Area;

WHEREAS, Burien desires to designate a planned action under SEPA for the Ambaum Corridor and Boulevard Park Community Plan Area (Planned Action) ;

WHEREAS, adopting a Planned Action for the Ambaum Corridor and Boulevard Park Community Plan with appropriate standards and procedures will help achieve efficient permit processing and promote environmental quality protection;

WHEREAS, upon the advice of the Community Development Department, this ordinance will be uncodedified, but there will be references to this ordinance in other codedified Planned Action Ordinances;

WHEREAS, the Burien City Council finds that adopting this ordinance and its exhibits is in the public interest and will advance the public health, peace, safety, and welfare; and

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, DO ORDAIN AS FOLLOWS:

Section One. This uncodedified ordinance, entitled **Findings.**, provides as follows:

The findings of the City of Burien City Council are as follows:

- A. Burien has complied with SEPA's (RCW Chapter 43.21C) procedural and substantive requirements and utilizes SEPA terminology from WAC Chapter 197-11.
- B. Burien has complied with the GMA's (RCW 36.70A) procedural requirements.
- C. The proposed action is consistent with the amended Burien Comprehensive Plan.
- D. The proposed amendments have been reviewed and processed under the SEPA Procedures and Policies in BMC Chapter 24.02.
- E. Burien has held public meetings and provided opportunities for public testimony and comment in compliance with state law and the Burien Municipal Code (BMC).
- F. All regulations of land use and development are subject to Burien's authority and general police power. Burien reserves its powers and authority to appropriately amend, modify, and revise such land use controls following applicable law.
- G. The Planned Action EIS adequately identifies and addresses the probable

significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action Area.

H. The mitigation measures identified in the Planned Action EIS, attached to this ordinance as Exhibit B, and incorporated herein by reference, together with adopted Burien development regulations, are adequate to mitigate significant adverse impacts from development within the Planned Action Area.

I. The Community Plan, zoning regulations, and Planned Action EIS identify the location, type, and amount of development contemplated by the Planned Action.

J. Future projects consistent with the Planned Action will protect the environment, benefit the public, and enhance economic development.

K. Burien provided several opportunities for public involvement and review in the Community Plan and Planned Action EIS processes, including a community meeting consistent with RCW 43.21C.440. Burien considered all comments received and modified the proposal or mitigation measures in response to comments.

L. Essential public facilities, as defined in RCW 36.70A.200, are excluded from the Planned Action as designated herein and are not eligible for review or permitting as Planned Action Projects unless there are accessories to or part of a project that otherwise qualify as a Planned Action Project.

M. The designated Planned Action Area is located entirely within an Urban Growth Area and is smaller than the overall Burien city limits.

N. The implementation of the mitigation measures identified in the Planned Action EIS will provide adequate public services and facilities to serve the proposed Planned Action Area.

Section Two. This uncodified ordinance, entitled **Purpose.**, provides as follows:

This ordinance will:

A. Combine environmental analysis, land use plans, development regulations, and Burien regulations and ordinances with the mitigation measures in the Planned Action EIS to mitigate environmental impacts and process Planned Action development applications in the Planned Action Area;

B. Designate the Ambaum Corridor and Boulevard Park Community Plan Area shown in Exhibit A as a Planned Action Area for purposes of environmental review and permitting of designated Planned Action Projects pursuant RCW 43.21C.440;

C. Confirm that the Planned Action EIS meets the requirements of a planned action EIS under SEPA;

D. Establish criteria and procedures for the designation of certain projects within the Planned Action Area as Planned Action Projects under RCW 43.21C.440;

E. Provide a clear definition of a Planned Action Project within the Planned Action Area, identify the Planned Action Project approval criteria, and determine how Burien will process qualifying Planned Action development project applications;

F. Streamline and expedite the land use permit review process by relying on the Planned Action EIS; and

G. Apply the mitigation framework contained in this ordinance to process measures into the underlying project permit conditions to address the impacts of future development contemplated by this ordinance.

Section Three. This uncodified ordinance, entitled **Procedures and Criteria for Evaluating and Determining Planned Action Projects within the Planned Action Area.**, provides as follows:

A. Planned Action Area. This Planned Action designation shall apply to the area shown in Exhibit A of this ordinance.

B. Environmental Document. A Planned Action Project determination for a site-specific project application within the Planned Action Area shall be based on the Planned Action EIS environmental analysis. Exhibit B's mitigation measures are based upon the Planned Action EIS findings and shall, along with adopted Burien's regulations, provide the framework Burien will use to apply appropriate conditions on qualifying Planned Action Projects within the Planned Action Area.

C. Planned Action Project Designated. Land uses and activities described in the Planned Action EIS, subject to Subsection 3.D standards and the mitigation measures contained in Exhibit B, are designated Planned Action Projects under RCW 43.21C.440. A development application for a site-specific project located within the Planned Action Area that meets the Subsections 3.D and 3.E criteria may be designated a Planned Action Project under Subsection 3.G below.

D. Planned Action Qualifications. The following standards shall apply to determine if a site-specific development proposed within the Planned Action Area was contemplated as a Planned Action Project and has had its environmental impacts evaluated in the Planned Action EIS:

(1) Qualifying Land Uses.

(a) Planned Action Categories: The following general categories/types of land uses are defined in the Ambaum Corridor and Boulevard Park Community Plan and can qualify as Planned Actions:

- i. Residential
- ii. Retail, Commercial, and Services
- iii. Office
- iv. Mixed uses
- v. Light Industrial
- vi. Open Space, Passive or Active Parks, Trails, Recreation, Gathering Spaces
- vii. Street and non-motorized circulation improvements consistent with the Transportation evaluation in the Planned Action EIS and Community Plan.
- viii. Civic, Cultural, Governmental and Utility Facilities as identified in the Ambaum Corridor and Boulevard Park Community Plan and allowed in the Burien Zoning Code.
- ix. Other uses allowed in the Zoning regulations applicable to the Ambaum Corridor and Boulevard Park Community Plan Area that are similar to studied uses as determined by the responsible official or designee.
- x. Enlargement or intensification of uses existing when the Planned Action Area is approved if such enlargement or intensification complies with the Zoning Code.

(b) Planned Action Project Land Uses: A land use can qualify as a Planned Action Project land use when it is:

- i. within the Planned Action Area (see Exhibit A); and
- ii. within one or more of the land use categories described in Subsection 3.D(1)(a), above; or
- iii. a common accessory use or appurtenant to a permitted use.

A Planned Action Project may be a single Planned Action land use or a combination of Planned Action land uses in a mixed-use development.

(2) Development Limits:

(a) Land Use: The following maximum levels of new land uses are contemplated by the Planned Action: ¹

Planned Action Development Limits 2020-2044+: Preferred Alternative, September 2024

Net Development 2020-2044+	Net Housing: Preferred	Net Jobs: Preferred
Ambaum	1,563	595
Boulevard Park	1,471	837

(b) A responsible official may shift development amounts between Subsection 3.D(2)(a) land uses provided the person trips for the preferred alternative are not exceeded, and the development impacts identified in the Planned Action EIS are mitigated consistently with Exhibit B.

(c) Further environmental WAC 197-11-172 review may be required if any individual Planned Action Project or combination of Planned Action Projects exceeds the development levels specified in this Ordinance and/or alters the Planned Action EIS assumptions and analysis.

(3) Transportation Limits:

(a) Concurrency. All Planned Action Projects shall meet Burien's transportation concurrency requirements as enacted according to the Transportation Element and Transportation Master Plan.

(b) Impact Fee. All Planned Action Projects shall pay applicable impact fees for improvements addressed in BMC Chapter 19.35.

(c) Mitigation. Each planned action shall provide its proportionate share of transportation capital improvements considered in the Planned Action EIS to the extent such facilities are not included in the impact fee basis but are system improvements necessary for growth.

(d) Discretion.

i. A Burien SEPA Responsible Official or authorized representative shall determine incremental and total trip generation consistent with the Institute of Traffic Engineers (ITE) Trip Generation Manual (latest edition) or an alternative method accepted by the SEPA Responsible Official or authorized representative, at their sole discretion, for each project permit application proposed under this Planned Action.

ii. A Burien SEPA Responsible Official shall condition Planned Action Project applications to meet the provisions of this

Planned Action Ordinance and the Burien Municipal Code.

iii. Planned Action Project applicants shall pay a proportionate share of the costs of the projects identified in Exhibit B. A Burien's SEPA Responsible Official shall allocate responsibility for required improvements between individual Planned Action Projects based upon their identified impacts and share of mitigation costs consistent with Exhibit B.

(4) Elements of the Environment and Degree of Impacts. A proposed project that would significantly change the type or degree of adverse impacts to any element(s) of the environment analyzed in the Planned Action EIS will not qualify as a Planned Action Project.

(5) Changed Conditions. Should environmental conditions change significantly from those analyzed in the Planned Action EIS, A Burien SEPA Responsible Official may determine that the Planned Action Project designation is no longer applicable until a supplemental environmental review is conducted.

E. Planned Action Project Review Criteria.

(1) When evaluating a Planned Action according to the permit process in Subsection F, a Burien SEPA Responsible Official, or authorized representative, may designate as a Planned Action Project, under RCW 43.21C.440, a project application that meets all of the following conditions:

(a) the project is located within the Planned Action Area identified in Exhibit A;

(b) the proposed uses and activities are consistent with those described in the Planned Action EIS and Subsection 3.D, herein;

(c) the project is within the Planned Action thresholds and other criteria of Subsection 3.D, herein;

(d) the project is consistent with the Burien Comprehensive Plan, including the Ambaum Corridor and Boulevard Park Community Plan policies incorporated into the Comprehensive Plan and the Ambaum Corridor and Boulevard Park Community Plan regulations integrated into the Burien Municipal Code;

(e) the project's significant adverse environmental impacts have been identified in the Planned Action EIS;

(f) the project's significant impacts will be mitigated by the

application of the measures identified in Exhibit B and other applicable Burien's regulations, together with any conditions, modifications, variances, design review, or special permits that may be required;

(g) the project complies with all applicable local, state, and/or federal laws and regulations, and a Burien SEPA Responsible Official determines that these constitute adequate mitigation; and

(h) the project is not an essential public facility as defined by RCW 36.70A.200 unless the essential public facility is an accessory to or part of a development designated as a Planned Action Project.

(2) Burien shall base its decision to qualify a project as a Planned Action Project on a review of the SEPA Checklist form in WAC 197-11 together with the supplemental Planned Action Ordinance Checklist in Exhibit C, and a review of the Planned Action Project submittal and supporting documentation, provided on Burien's required forms, using the procedures of Subsection 3.G.

F. Effect of Planned Action Designation.

(1) Designation as a Planned Action Project by a Burien SEPA Responsible Official means that a qualifying project application will be reviewed under this ordinance.

(2) Upon determination by a Burien SEPA Responsible Official, under Subsection 3.G, that the project application meets the criteria of Subsection 3.D and qualifies as a Planned Action Project, the project will not require a SEPA threshold determination, preparation of an EIS, or further review under SEPA. Planned Action Projects will remain subject to all other applicable Burien, state, and federal regulatory requirements. The Planned Action Project designation shall not excuse a project from meeting Burien's municipal requirements apart from the SEPA process.

G. Planned Action Project Permit Process. Applications submitted for qualification as a Planned Action Project shall be reviewed under the following process:

(1) Development applications shall meet all applicable requirements of Burien's municipal and zoning codes, and this ordinance is effective at the time of the Planned Action Project application.

(2) Applications for Planned Action Projects shall:

(a) be made on Burien-provided forms;

(b) include the WAC Chapter 197-11 SEPA checklist; and

(c) meet all applicable ordinance and Burien Municipal Code requirements.

(3) A Burien SEPA Responsible Official shall determine whether the application is complete and shall review the application to determine if it is consistent with and meets all of the criteria for qualification as a Planned Action Project provided in this ordinance.

(4) (a) If a Burien SEPA Responsible Official determines that a proposed project qualifies as a Planned Action Project, they shall issue a Determination of Consistency and mail or otherwise verifiably send it to the applicant; the owner of the property listed on the application; and, federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, under RCW 43.21C.440(3)(b).

(b) Upon the Determination of Consistency issuance, the underlying project permit(s) review shall follow the applicable permit review procedures specified in Burien's municipal code, except no SEPA threshold determination, EIS, or additional SEPA review shall be required.

(c) The Determination of Consistency will be valid and effective as long as the underlying project application approval is valid and effective.

(d) Public notice and review for qualified Planned Action Projects shall be tied to the underlying project permit(s). If notice is otherwise required for the underlying permit(s), the notice shall state that the project qualifies as a Planned Action Project. If notice is not required for the underlying project permit(s), no special notice is required.

(5) (a) If a Burien SEPA Responsible Official determines that a proposed project does not qualify as a Planned Action Project, they shall issue a Determination of Inconsistency and shall mail or otherwise verifiably send said Determination to the applicant; the owner of the property listed on the application; and federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, under RCW 43.21C.440(3)(b).

(b) The Determination of Inconsistency shall describe the elements of the Planned Action Project application that fail to qualify as a Planned Action Project.

(c) Upon the Determination of Inconsistency issuance, a Burien SEPA Responsible Official shall prescribe a SEPA review procedure for the non-qualifying project consistent with Burien's SEPA regulations and state law.

(d) A project that fails to qualify as a Planned Action Project may incorporate or use relevant Planned Action EIS elements, and other relevant SEPA documents to meet the non-qualifying project's SEPA requirements. A Burien SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts unaddressed in the Planned Action EIS.

(6) To provide additional certainty about applicable requirements, Burien or the applicant may request consideration and execution of a development agreement for a Planned Action Project, consistent with RCW 36.70B.170, et seq.

(7) A Determination of Consistency or Inconsistency is accomplished consistent with a Type I permit per BMC 19.65.065 and may be appealed under BMC 19.65.065 procedures. An appeal of a Determination of Consistency shall be consolidated with any pre-decision or appeal hearing on the underlying project application.

Section Four. Monitoring and Review.

A. Burien should monitor the progress of development in the designated Planned Action area in association with Burien's periodic review of its Comprehensive Plan to ensure that it is consistent with this ordinance's assumptions and the Planned Action EIS regarding the type and amount of development and associated impacts, the mode and location of person trips, and with the mitigation measures and improvements planned for the Planned Action Area.

B. This Planned Action Ordinance shall be reviewed by a Burien SEPA Responsible Official every five (5) years in conjunction with Burien's regular Comprehensive Plan review cycle or 5-year monitoring report, whichever is first. The review shall determine the continuing relevance of the Planned Action assumptions and findings for environmental conditions in the Planned Action Area, the impacts of development, and required mitigation measures (Exhibit B). Based upon this review, Burien may propose amendments to this ordinance or supplement or revise the Planned Action EIS.

Section Five. Severability. Should a court of competent jurisdiction find any section, paragraph, sentence, clause, or phrase of this ordinance, or its application to any person or circumstance, unconstitutional or otherwise invalid for any reason, or should any portion of this ordinance be pre-empted by state or federal law or regulation, such decision or pre-emption shall

not affect the validity of the remaining parts of this ordinance or its application to other persons or circumstances.

Section Six. Corrections. The City Clerk and codifiers of the ordinance are authorized to make necessary corrections to this ordinance, including, but not limited to, the correction of scrivener/clerical errors, references, ordinance numbering, section/subsection numbers, and any references thereto.

Section Seven. Effective Date. This ordinance shall be published in Burien's official newspaper and take effect five (5) calendar days after publication.

ADOPTED BY THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, AT A REGULAR BUSINESS MEETING THEREOF THIS 18th DAY OF NOVEMBER 2024.

CITY OF BURIEN

Kevin J. Schilling, Mayor

ATTEST/AUTHENTICATED:

Heather Dumlao, City Clerk, CMC

Approved as to form:



Garmon Newsom II, City Attorney

Filed with the City Clerk: October 4, 2024
Passed by the City Council: November 18, 2024
Ordinance No.: 845
Date of Publication: November 22, 2024

Exhibit A. Planned Action Area (Denoted as Study Areas)

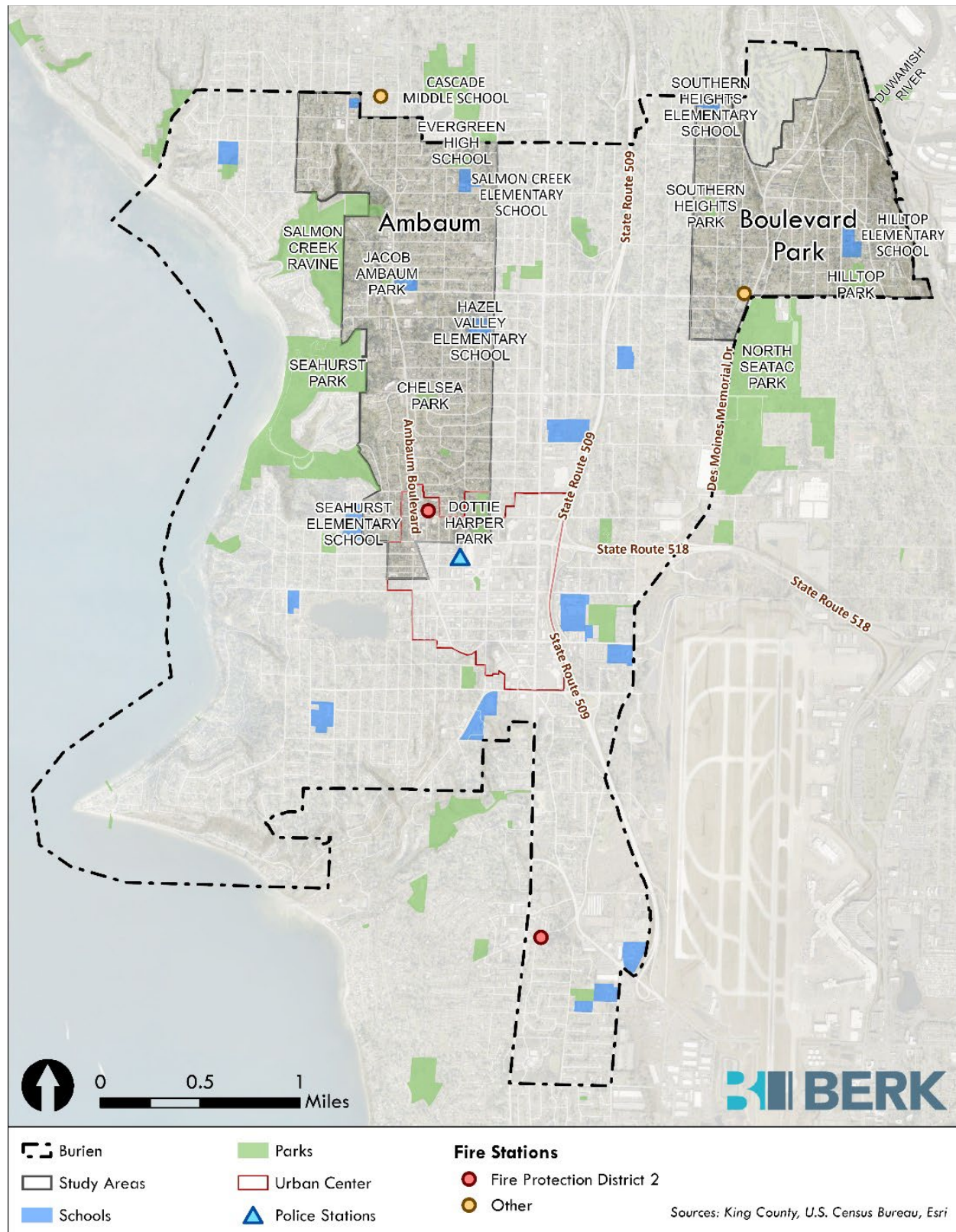


Exhibit B. Mitigation Measures

INTRODUCTION

This section includes B-1 Mitigation Measures referenced in the Planned Action EIS and adopted codes and regulations in Section B-2. Performance standards are included to ensure conformity with mitigation measures that were incorporated into the Community Plan and Zoning Code.

Definitions of mitigation measures and performance measures include:

- Mitigation Measure: means to prevent, reduce or control adverse environmental effects of a planned action consistent with WAC 197-11-768, as described in the Final EIS and incorporated into Exhibit B of this Ordinance.
- Performance Measure: A criterion that a planned action must adhere to in order to demonstrate mitigation is achieved consistent with the Final EIS.

B-1. MITIGATION MEASURES

Land Use Patterns

1. Outdoor Space Noise Mitigation: Properties within a 65dBA or greater noise level from roadways or ground transportation facilities shall demonstrate all feasible site planning techniques are included such as:
 - a. Increase the distance from the road.
 - b. Place noise compatible land uses such as parking lots, maintenance facilities, and utility areas between the road and the residences.
 - c. Use buildings or berms as noise shields by locating them parallel to the road. (Note, this is an effective strategy for roads, but is ineffective from aircraft noise.) Soundproof the building if it contains residences.
 - d. Locate residences in topographically low points that are naturally low noise pockets if they exist.
 - e. Orient the residences—and spaces within the building that benefit from quieter volumes (bedrooms and living rooms)—away from the noise.
 - f. Use cluster and planned unit development techniques to accomplish combinations of the above.
2. Outdoor Space Noise Mitigation: Where properties are subject to Zone 1 Aircraft noise reduction area standards in Chapter 15.12 BMC with a proposed outdoor space, any public gathering space or semi-private common open space shall include noise-masking features, such as one or more of the following techniques:
 - a. Install overhead shelters, which can double as shade and weather protection.
 - b. Add water features with running water to create background noise that helps lessen the impacts of greater noises.

- c. Plant evergreen trees with big leaves for year-round white noise from leaves rustling in wind.
 - d. Use wind chimes and speakers to add desired noises.
3. Performance Measure: Planned Action applications shall demonstrate consistency with applicable Comprehensive Plan, Community Plan, Zoning Code, and Design Guidelines policies and standards.

Utilities: Surface Water and Stormwater

- 4. Mitigation Measure: Planned Action applications shall demonstrate implementation of their fair share of priority improvements in Study 1 and Study 2, Burien 2020 Storm Drainage Master Plan Update.
- 5. Mitigation Measure: Development applications within areas that currently have no flow control or water quality treatment systems shall implement retrofit systems to detain and/or treat runoff before it is released into creeks, especially within the Miller/Walker Creek basin. These systems may be located within planter areas or unimproved roadside shoulders and ditches, and should include shallow bioretention cells, infiltration trenches, or proprietary treatment best management practices (BMPs) for water pollution, such as Filterrras or Modular Wetlands.
- 6. Mitigation Measure: Planned Action Applicants shall demonstrate all feasible use of stormwater BMPs that utilize trees (such as Silva Cells) before other water quality BMPs.
- 7. Mitigation Measure: The City shall apply the stormwater management manual in effect at the time of proposal application. If a regional flow control facility is approved by the City, an applicant may request or the City may condition development to pay a fee based on the area of new and replaced impervious surface subject to the stormwater management manual in place at the time of application.
- 8. Mitigation Measure: Development applications on parcels that have historically experienced flooding or are within the 25-year flood areas from the Boulevard Park Flooding Reduction Project Study (Otak, 2021) shall conduct a site assessment for features that meet the definition of a stream wetland, or other critical area per BMC 19.40. This shall include at a minimum a survey and if a stream, wetland, or other critical area is found, appropriate classification designations as required. This survey is required when redevelopment is proposed and is the responsibility of the property owner, if not preceded by a City survey and classification or study. The City shall condition applicants with appropriate mitigation measures for stream, wetlands, or other critical areas on the basis of a study prepared to the satisfaction of the responsible official per BMC 19.40.

Transportation

- 9. Performance Measure: Planned Action applications shall demonstrate consistency with frontage and street design standards established in the Community Plan, Zoning Code, and Design Standards.
- 10. Performance Measure: Where a Planned Action development's street frontage includes an existing or planned transit stop, such development shall be conditioned to install transit stops to the standards of King County Metro.
- 11. Performance Measure: The City shall condition Planned Action applications to:
 - a. Implement system transportation improvements related to growth in the subarea. A Planned Action Project's responsibility to provide for system improvements is based on the payment of

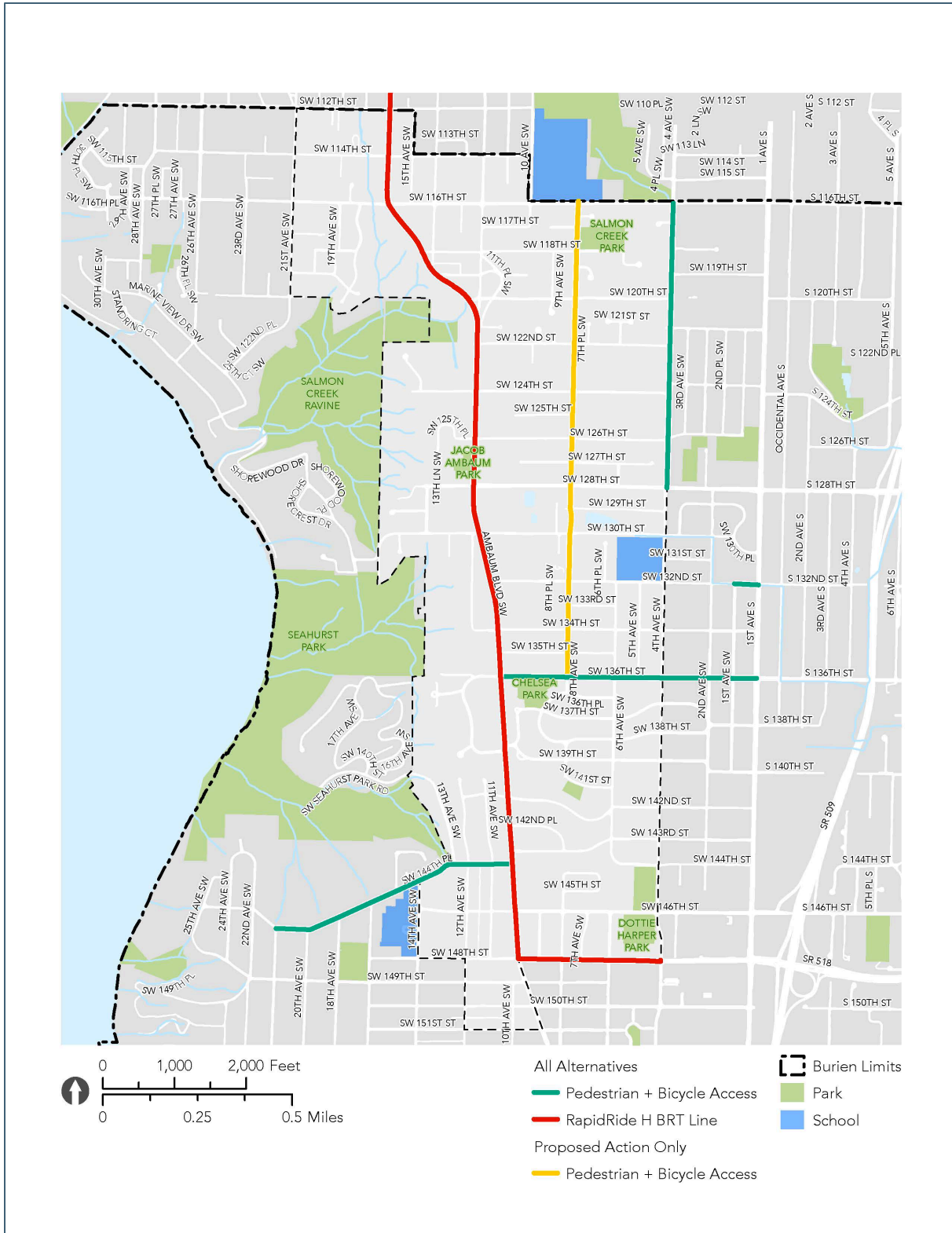
citywide impact fees for improvements included therein. In addition, the Planned Action Project shall pay its fair share of system improvements not included in the citywide impact fee in proportion to the person trips generated to support necessary improvements identified in the Planned Action EIS and listed in Table B-1. Figures B-1A and B-1B summarize the transportation network assumptions for the future year alternatives.

- b. Provide site specific mitigation consistent with City standards. The City shall require safe and efficient circulation and site access and improvements attributable to individual developments in order to meet City 2016 Road Design and Construction Standards, or as thereafter amended.

Table B-1. Transportation Improvements

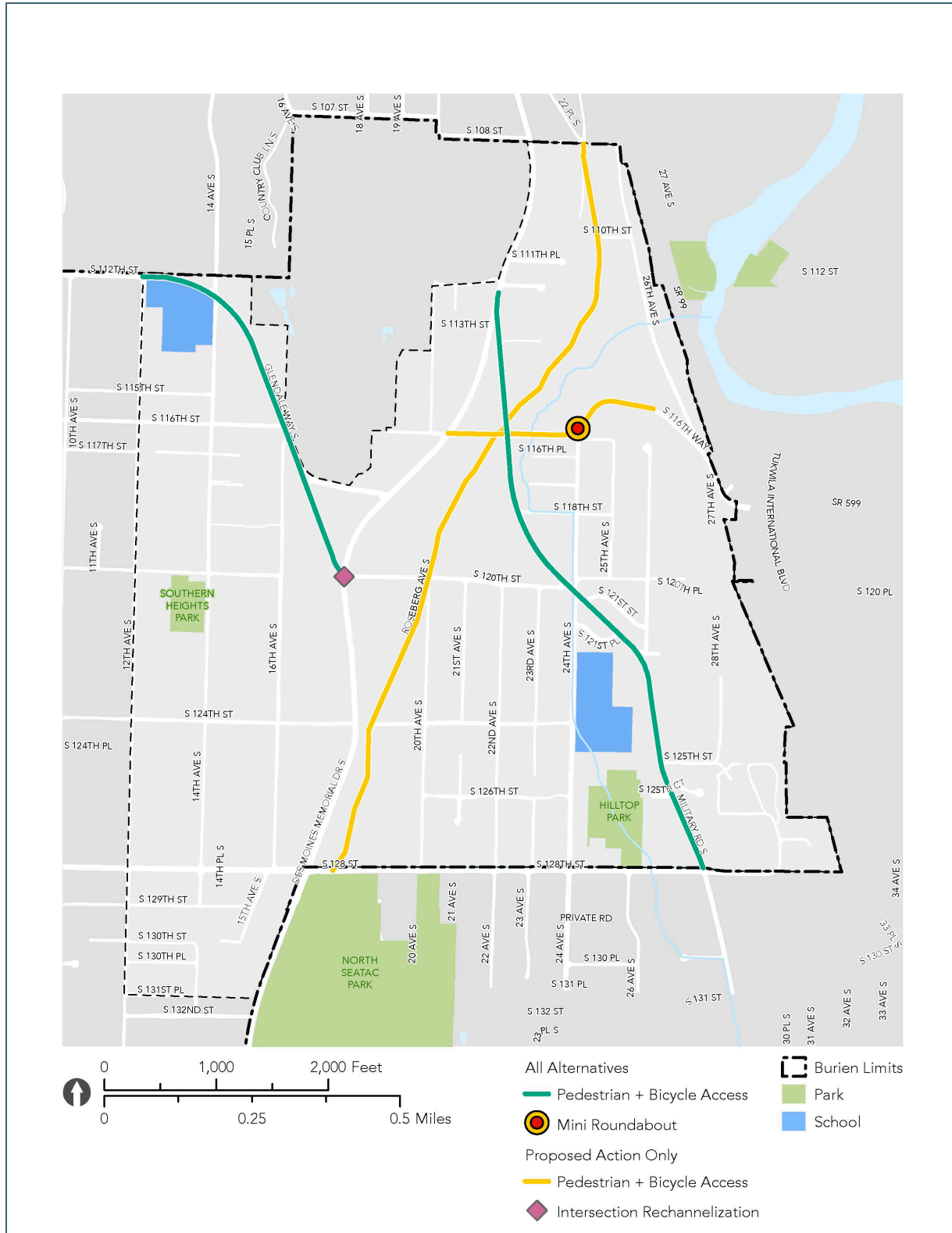
Ambaum Corridor
▪ SW 136th Street Reconstruction – add bike lanes, parking, and sidewalks from 1st Avenue S to Ambaum Boulevard SW ▪ SW 132nd Street Trail Completion from 1st Avenue SW to 1st Avenue S ▪ 4th Avenue SW Bike Lanes from SW 116th Street to SW 128th Street ▪ SW 144th Street and SW 146th Street Reconstruction – add bike lanes and sidewalks from Ambaum Boulevard SW to 21st Avenue SW ▪ S/SW 146th Street Reconstruction – implement ADA sidewalk standards and add bike lanes or sharrows ▪ Ongoing construction of the new RapidRide H BRT Line – improvements to the pedestrian network and access to transit along Ambaum Boulevard SW ▪ 8th Avenue SW improvements – create a continuous bicycle route through the Ambaum Corridor subarea ▪ Through-block pedestrian connection requirements for future development
Boulevard Park
▪ Military Road S Reconstruction – add pedestrian facilities, center medians, signal improvements, and driveway consolidation ▪ S 116th Street Mini Roundabout at 24th Avenue S ▪ Bicycle lanes along S 112th Street and Glendale Way S ▪ S 120th Street and Des Moines Memorial Drive S intersection redesign to increase pedestrian comfort and safety ▪ Roseberg Avenue S improvements – create a continuous bicycle route through the Boulevard Park subarea ▪ Complete sidewalk network along arterial roadways within the Boulevard Park subarea ▪ Through-block pedestrian connection requirement for future development

B-1.A Future Transportation Network Assumptions – Ambaum Corridor



Source: Fehr & Peers, 2022, City of Burien, 2022.

B-1.B Future Transportation Network Assumptions – Boulevard Park



Source: Fehr & Peers, 2022, City of Burien, 2022.

Public Services

12. Performance Measure: Planned Action applications shall demonstrate consistency with on-site open space requirements in the Zoning Code.
13. Mitigation Measure: The City may require a mitigation agreement between the Planned Action Project developer and Fire District 2 prior to development to address needed capital investments at stations serving the Study Area (e.g., stations and ladder trucks or other).

Utilities

14. Mitigation Measure: Planned Action applicants shall demonstrate conformance with Chapter 19.70 Adequacy of Public Facilities and Services and City of Burien Municipal Code Title 13, Water and Sewers.

B-2. CODES AND REGULATIONS SERVING AS MITIGATION

The Planned Action EIS identifies specific regulations that act as mitigation measures. These are summarized below EIS topic. All applicable federal, state, and local regulations shall apply to Planned Action Projects. Planned Action Project applicants shall comply with all adopted regulations in place at time of development application where applicable including those listed in the Planned Action EIS and those not included in the Planned Action EIS.

Land Use Patterns

- Burien's building code requires noise abatement according to its Airport Noise Reduction Areas map ([BMC 15.12](#)) for all new construction and additions for inhabitable building areas.
- US HUD discourages new construction in "normally unacceptable noise zones" (65-70 dB) areas like Boulevard Park. New projects would require environmental review and may require special approvals, documented mitigation requirements, and evidence of mitigation.
- Chapter 19.45 establishing a multifamily tax exemption applicable to the planned action area.

Aesthetics and Urban Design

- See Title 19 for applicable zoning and design standards adopted for Ambaum Corridor and Boulevard Park Community Plan Area.

Socioeconomics, Equity, and Displacement

- Chapter 15.40 BMC addresses building and property maintenance.
- Local governments, authorized by WAC 365-196-835 and detailed in RCW 59.18.440, can pass an ordinance that requires developers, public funds, or a combination of the two to provide relocation funds for these displaced tenants.

Transportation

- Burien implements Commute Trip Reduction at Chapter 10.60 BMC.
- The Capital Facility Element identifies planned improvements that are part of the transportation

impact fee. The Transportation Improvement Program also identifies planned improvements.

Public Services

- The City requires conformance with Chapter 19.70 Adequacy of Public Facilities and Services.
- Police enforcement is governed in part by Title 9 Public Peace, Morals and Welfare.
- Fire and emergency service provision to new development is governed by BMC 19.70.110 Adequate Fire Protection and BMC 15.20 Fire Code.

Utilities

Plans and regulations adopted at the time development permits are submitted will be applicable, including but not limited to:

- 1972 Clean Water Act (CWA)
- Phase II of the National Pollutant Discharge Elimination System (NPDES) permit program. Under this set of regulations, the City maintains measures to protect and improve runoff conditions in relation to the receiving waters.
- City of Burien Municipal Code Title 13, Water and Sewers
- City of Burien Municipal Code Chapter 19.70, Adequacy of Public Facilities and Services
- City of Burien Municipal Code Chapter 19.40, Critical Areas
- King County Code
 - King County Wastewater Treatment Division
 - 2013 Regional Wastewater Services Plan Comprehensive Review
 - Wastewater Services Plan 2017 Annual Report
 - Regional Needs Assessment, Conveyance System Improvements Program, May 2015
 - 2017 Conveyance System Improvements (CSI) Program Update
- City of Burien 2020 Master Drainage Plan
- 2006 Miller and Walker Creek Basin Plan
- 2021 King County Surface Water Design Manual (adopted in BMC 13.10.020)
- City of Burien and Seattle City Light Franchise Agreement
- City of Burien 2016 Road Design and Construction Standards
 - of a greater capacity or a longer distance than is needed for that developer's project alone.
- City of Burien 2016 Road Design and Construction Standards require minimum lighting levels for roadways for proposed projects.

EXHIBIT C SUPPLEMENTAL CHECKLIST

This form supplements the standard SEPA Checklist at [WAC 197-11-960](#). This form supports the City's determination of consistency. The applicant shall fill in fields referenced for applicants. City staff shall complete the consistency fields referenced.

Table C-1. Proposal Elements and Planned Action Consistency

Proposal	Applicant Information	Consistency (City to Complete)
Property Information	Address:	In Planned Action Area?
	Parcel #:	☐ Yes
	Parcel Acres:	☐ No
Land Use	Dwellings # (Net)	Consistent with Planned Action Land Uses and BMC?
	▪ Attached:	☐ Yes
	▪ Detached:	☐ No
	Employment Sq Ft (Net):	Beginning Housing Unit Balance:
	▪ Office	Post Project Housing Unit Balance #:
	▪ Retail	Beginning Job Balance:
	▪ Industrial	Post Project Job Balance #:
Transportation	Average Tenant Space Sq Ft:	
	Estimated Jobs (Net):	
	Building Height Ft:	
	Stories #:	
Transportation	Frontage Type:	Traffic Impact Fee Addresses Project Contribution to System Need:
	Transportation Impact Fee Due:	☐ Yes
		☐ No
Parks, Stormwater, Utilities	Transportation Improvements required per Table B-1 or City standards to address safety, circulation, and access:	
	Plaza/Open Space Sq Ft:	Fire Service Adequacy?
	Water Adequacy Certificate?	☐ Yes
	☐ Yes	☐ No
	☐ No	Police Service Adequacy?
	Sewer Adequacy Certificate?	☐ Yes
	☐ Yes	☐ No
	☐ No	Safe routes to schools provided?
		☐ Yes
		☐ No

Table C-1 Applicant Narrative

Table C-1 City Discussion

Draft

C-2. Mitigation Measure Consistency

EIS Topic	Description of B-1 Mitigation (Applicant Information)	Consistent (City to Complete)	Discussion (City to Complete)
Land Use Patterns	1. 2. 3.	☐ Yes ☐ No	
Utilities: Surface Water and Stormwater	4. 5. 6. 7. 8.	☐ Yes ☐ No	
Transportation	9. 10. 11.	☐ Yes ☐ No	
Public Services	12. 13.	☐ Yes ☐ No	
Utilities	14.	☐ Yes ☐ No	

Table C-2 Applicant Narrative

Table C-2 City Discussion

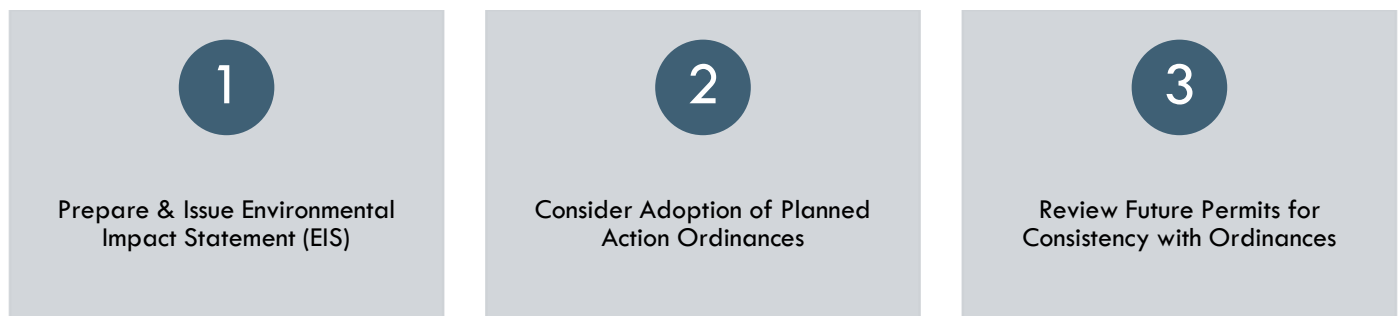
Greater Downtown Urban Center Planned Action

A planned action provides more detailed environmental analysis during an areawide planning stage rather than at the project permit review stage. Designating a planned action area identifies area-wide impacts and mitigation measures before development occurs, and then streamlines environmental review for future development proposals. Planned actions are development proposals that fall within the scope of the environmental analysis undertaken in support of a planned action ordinance. Planned actions can cover a range of land uses and service or infrastructure investments.

The January 2024 Draft EIS is designed to provide programmatic analysis across the study area. In addition to an areawide analysis, the EIS provides more detailed environmental review for areas of focus. The City is exploring the use of a planned action (RCW 43.21c.440) in the Downtown.

Steps to establishing a planned action or infill exemption are to prepare the EIS and consider adoption of an ordinance establishing the requirements, followed by individual permit review. This EIS provides the environmental review for the planned actions and infill exemptions being studied as part of the Burien 2044 process.

Planned Action or Infill Exemption Steps



Source: BERK, 2021.

The Draft Comprehensive Plan including the Urban Center and implementing zoning was evaluated in an a Draft EIS in January 2024. This document provides an overview of the Draft Planned Action Ordinance that incorporates the mitigation measures.

A scoping period and associated vision workshop were held in October 2022. An Advisory Committee provided advice on growth alternatives studied in a Draft EIS and subject to a 60-day comment period over January 10, 2024 to March 11, 2024. A range of alternatives were evaluated and mitigation measures were developed.

The Final EIS will review a preferred alternative similar to the Draft EIS alternatives, and will provide responses to comments.

A community meeting was held on June 25, 2024 to share the draft ordinance. The Planned Action Ordinance will undergo a public hearing before the Planning Commission. The City may develop an alternative that is similar to or blends features of multiple alternatives and is in the range of the analysis.

The Draft EIS provided a citywide evaluation as well as an evaluation of the Urban Center. The Planning Commission is interested in the Greater Downtown concept of mixed use both within the Urban Center but also north and south of the Urban Center on 1st Avenue S. Thus, the Planned Action boundary is modified from that in the Draft EIS to extend following the Greater Downtown concept and will be evaluated with the Planning Commission Preferred Alternative in the Final EIS.

What is a Planned Action Project?

What qualifies as a Planned Action Project is described in the Planned Action Ordinance, such as the uses, growth levels, etc. When a project is submitted for development permits, the City reviews the project to see that it is consistent with the Planned Action Ordinance. If the impacts were adequately addressed in the EIS and the project includes any conditions or mitigation required in the Ordinance, it can be approved as a “Planned Action” project. The SEPA process is done and there are no additional SEPA public notice requirements.

Does this exempt a Planned Action project from meeting other requirements?

No. During the permitting process, a proposal is still required to submit a SEPA checklist explaining project impacts. If the City determines that a proposal will have significant probable environmental impacts that were not addressed in the EIS during the area planning stage, the proposal won't qualify as a Planned Action. It would be required to go through the normal SEPA environmental review. Also, a Planned Action project must still be analyzed for consistency with City plans and development regulations. Projects must comply with hook-up and permit fees and meet other City requirements. Additional conditions may be imposed through the normal land use permit reviews.

CITY OF BURIEN, WASHINGTON

ORDINANCE NO. 846

AN ORDINANCE OF THE CITY OF BURIEN, WASHINGTON, RELATING TO ESTABLISHING A PLANNED ACTION FOR THE BURIEN GREATER DOWNTOWN AND URBAN CENTER, PROVIDING FOR SEVERABILITY, AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, the State Environmental Policy Act (SEPA) and its implementing regulations provide for the integration of environmental review with land use planning and project review through the designation of planned actions by jurisdictions planning under the Growth Management Act (GMA), including the City of Burien (Burien);

WHEREAS, Section 43.21C.440 of the Revised Code of Washington (RCW), Sections 197-11-164 through 172 of the Washington Administrative Code (WAC) allow for and govern the adoption and application of a planned action designation under SEPA;

WHEREAS, Burien has adopted SEPA Rules regarding Planned Actions in Burien Municipal Code (BMC) 14.10.050;

WHEREAS, the designation of a planned action expedites the permitting process for projects of which the impacts have been previously addressed in an environmental impact statement (EIS);

WHEREAS, the Burien City Council adopted Ordinance 847 amending its Comprehensive Plan and to adopt the Urban Center Plan as an element of the Comprehensive Plan to guide development within the Planned Action Area;

WHEREAS, after public participation and coordination with affected parties, Burien, as lead SEPA agency, issued the Burien 2044 Comprehensive Plan Update Draft Environmental Impact Statement (DEIS) on January 10, 2044 and a Final Supplemental Environmental Impact Statement dated October 18, 2024 (FEIS), which identifies the impacts and mitigation measures associated with planned development in the Future Planned Action Area;

WHEREAS, a subarea of the city consisting of the Greater Downtown Urban Center as depicted on the map attached hereto as Exhibit A and incorporated herein by this reference has been identified as a planned action area for future redevelopment to a mixed-use center (Planned Action Area);

WHEREAS, the Burien City Council adopted Ordinance 849 addressing the Zoning Map, Zoning Code Amendments, and design guidelines, to regulate development within the Planned

Action Area;

WHEREAS on October 28, 2024, the Burien City Council amended its Comprehensive Plan to adopt the Ambaum Corridor and Boulevard Park Community Plan Area to guide development within the Future Planned Action Area;

WHEREAS, Burien desires to designate a planned action under SEPA for the Greater Downtown Urban Center Area (Planned Action);

WHEREAS, adopting a Planned Action for the Greater Downtown Urban Center plan with appropriate standards and procedures will help achieve efficient permit processing and promote environmental quality protection;

WHEREAS, upon the advice of the Community Development Department, this ordinance will be uncoded, but there will be references to this ordinance in other codified Planned Action Ordinances;

WHEREAS, the Burien City Council of the City of Burien finds that adopting this Ordinance and its Exhibits is in the public interest and will advance the public health, safety, and welfare; and

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, DO ORDAIN AS FOLLOWS:

Section One. This uncoded ordinance, entitled **Findings.**, provides as follows:

The findings of the City of Burien City Council are as follows:

- A. Burien has complied with SEPA's (RCW Chapter 43.21C) procedural and substantive requirements and utilizes SEPA terminology from WAC Chapter 197-11.
- B. Burien has complied with the GMA's (RCW 36.70A) procedural requirements.
- C. The proposed action is consistent with the amended Burien Comprehensive Plan.
- D. The proposed amendments have been reviewed and processed under the SEPA Procedures and Policies in BMC Chapter 24.02.
- E. Burien has held public meetings and provided opportunities for public testimony and comment in compliance with state law and the Burien Municipal Code (BMC).
- F. All regulations of land use and development are subject to Burien's authority and general police power. Burien reserves its powers and authority to appropriately amend, modify, and revise such land use controls following applicable law.

G. The Planned Action EIS adequately identifies and addresses the probable significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action Area.

H. The mitigation measures identified in the Planned Action EIS, attached to this ordinance as Exhibit B, and incorporated herein by reference, together with adopted Burien development regulations, are adequate to mitigate significant adverse impacts from development within the Planned Action Area.

I. The Community Plan, zoning regulations, and Planned Action EIS identify the location, type, and amount of development contemplated by the Planned Action.

J. Future projects consistent with the Planned Action will protect the environment, benefit the public, and enhance economic development.

K. Burien provided several opportunities for public involvement and review in the Community Plan and Planned Action EIS processes, including a community meeting consistent with RCW 43.21C.440. Burien considered all comments received and modified the proposal or mitigation measures in response to comments.

L. Essential public facilities, as defined in RCW 36.70A.200, are excluded from the Planned Action as designated herein and are not eligible for review or permitting as Planned Action Projects unless there are accessories to or part of a project that otherwise qualify as a Planned Action Project.

M. The designated Planned Action Area is located entirely within an Urban Growth Area and is smaller than the overall Burien city limits.

N. The implementation of the mitigation measures identified in the Planned Action EIS will provide adequate public services and facilities to serve the proposed Planned Action Area.

Section Two. This uncodified ordinance, entitled **Purpose.**, provides as follows:

This ordinance will:

A. Combine environmental analysis, land use plans, development regulations, and Burien regulations and ordinances with the mitigation measures in the Planned Action EIS to mitigate environmental impacts and process Planned Action development applications in the Planned Action Area;

B. Designate the Ambaum Corridor and Boulevard Park Community Plan Area

shown in Exhibit A as a Planned Action Area for purposes of environmental review and permitting of designated Planned Action Projects pursuant RCW 43.21C.440;

C. Confirm that the Planned Action EIS meets the requirements of a planned action EIS under SEPA;

D. Establish criteria and procedures for the designation of certain projects within the Planned Action Area as Planned Action Projects under RCW 43.21C.440;

E. Provide a clear definition of a Planned Action Project within the Planned Action Area, identify the Planned Action Project approval criteria, and determine how Burien will process qualifying Planned Action development project applications;

F. Streamline and expedite the land use permit review process by relying on the Planned Action EIS; and

G. Apply the mitigation framework contained in this ordinance to process measures into the underlying project permit conditions to address the impacts of future development contemplated by this ordinance.

Section Three. This uncodified ordinance, entitled **Procedures and Criteria for Evaluating and Determining Planned Action Projects within the Planned Action Area.**, provides as follows:

A. Planned Action Area. This Planned Action designation shall apply to the area shown in Exhibit A of this ordinance.

B. Environmental Document. A Planned Action Project determination for a site-specific project application within the Planned Action Area shall be based on the Planned Action EIS environmental analysis. Exhibit B's mitigation measures are based upon the Planned Action EIS findings and shall, along with adopted Burien's regulations, provide the framework Burien will use to apply appropriate conditions on qualifying Planned Action Projects within the Planned Action Area.

C. Planned Action Project Designated. Land uses and activities described in the Planned Action EIS, subject to Subsection 3.D standards and the mitigation measures contained in Exhibit B, are designated Planned Action Projects under RCW 43.21C.440. A development application for a site-specific project located within the Planned Action Area that meets the Subsections 3.D and 3.E criteria may be designated a Planned Action Project under Subsection 3.G below.

D. Planned Action Qualifications. The following standards shall apply to determine if a site-specific development proposed within the Planned Action Area was contemplated as a Planned Action Project and has had its environmental impacts

evaluated in the Planned Action EIS:

(1) Qualifying Land Uses.

(a) Planned Action Categories: The following general categories/types of land uses are defined in the Ambaum Corridor and Boulevard Park Community Plan and can qualify as Planned Actions:

- i. Residential
- ii. Retail, Commercial, and Services
- iii. Office
- iv. Mixed uses
- v. Light Industrial
- vi. Open Space, Passive or Active Parks, Trails, Recreation, Gathering Spaces
- vii. Street and non-motorized circulation improvements consistent with the Transportation evaluation in the Planned Action EIS and Community Plan.
- viii. Civic, Cultural, Governmental and Utility Facilities as identified in the Ambaum Corridor and Boulevard Park Community Plan and allowed in the Burien Zoning Code.
- ix. Other uses allowed in the Zoning regulations applicable to the Ambaum Corridor and Boulevard Park Community Plan Area that are similar to studied uses as determined by the responsible official or designee.
- x. Enlargement or intensification of uses existing when the Planned Action Area is approved if such enlargement or intensification complies with the Zoning Code.

(b) Planned Action Project Land Uses: A land use can qualify as a Planned Action Project land use when it is:

- i. within the Planned Action Area (see Exhibit A); and
- ii. within one or more of the land use categories described in Subsection 3.D(1)(a), above; or
- iii. a common accessory use or appurtenant to a permitted use.

A Planned Action Project may be a single Planned Action land use or a combination of Planned Action land uses in a mixed-use development.

(2) Development Limits:

(a) Land Use: The following maximum levels of new land uses are

contemplated by the Planned Action: ¹

Planned Action Development Limits 2020-2044+: Preferred Alternative, September 2024

Net Housing: Preferred	Net Jobs: Preferred
2,316	1,076

**Reflect Planning Commission recommendation as of July 3, 2024. These figures may be amended based on Future Land Use/Zoning map corrections September 2024.*

(b) A responsible official may shift development amounts between Subsection 3.D(2)(a) land uses provided the person trips for the preferred alternative are not exceeded, and the development impacts identified in the Planned Action EIS are mitigated consistently with Exhibit B.

(c) Further environmental WAC 197-11-172 review may be required if any individual Planned Action Project or combination of Planned Action Projects exceeds the development levels specified in this Ordinance and/or alters the Planned Action EIS assumptions and analysis.

(3) Transportation Limits:

(a) Concurrency. All Planned Action Projects shall meet Burien's transportation concurrency requirements as **enacted according to** the Transportation Element and Transportation Master Plan.

(b) Impact Fee. All Planned Action Projects shall pay applicable impact fees for improvements addressed in BMC Chapter 19.35.

(c) Mitigation. Each planned action shall provide its proportionate share of transportation capital improvements considered in the Planned Action EIS to the extent such facilities are not included in the impact fee basis but are system improvements necessary for growth.

(d) Discretion.

i. A Burien SEPA Responsible Official or authorized representative shall determine incremental and total trip generation consistent with the Institute of Traffic Engineers (ITE) Trip Generation Manual (latest edition) or an alternative method accepted by the SEPA Responsible Official or authorized representative, at their sole discretion, for each project permit application proposed under this Planned Action.

ii. A Burien SEPA Responsible Official shall condition

Planned Action Project applications to meet the provisions of this Planned Action Ordinance and the Burien Municipal Code.

iii. Planned Action Project applicants shall pay a proportionate share of the costs of the projects identified in Exhibit B. A Burien's SEPA Responsible Official shall allocate responsibility for required improvements between individual Planned Action Projects based upon their identified impacts and share of mitigation costs consistent with Exhibit B.

(4) Elements of the Environment and Degree of Impacts. A proposed project that would significantly change the type or degree of adverse impacts to any element(s) of the environment analyzed in the Planned Action EIS will not qualify as a Planned Action Project.

(5) Changed Conditions. Should environmental conditions change significantly from those analyzed in the Planned Action EIS, A Burien SEPA Responsible Official may determine that the Planned Action Project designation is no longer applicable until a supplemental environmental review is conducted.

E. Planned Action Project Review Criteria.

(1) When evaluating a Planned Action according to the permit process in Subsection F, a Burien SEPA Responsible Official, or authorized representative, may designate as a Planned Action Project, under RCW 43.21C.440, a project application that meets all of the following conditions:

(a) the project is located within the Planned Action Area identified in Exhibit A;

(b) the proposed uses and activities are consistent with those described in the Planned Action EIS and Subsection 3.D, herein;

(c) the project is within the Planned Action thresholds and other criteria of Subsection 3.D, herein;

(d) the project is consistent with the Burien Comprehensive Plan, including the Ambaum Corridor and Boulevard Park Community Plan policies incorporated into the Comprehensive Plan and the Ambaum Corridor and Boulevard Park Community Plan regulations integrated into the Burien Municipal Code;

(e) the project's significant adverse environmental impacts have been identified in the Planned Action EIS;

(f) the project's significant impacts will be mitigated by the application of the measures identified in Exhibit B and other applicable Burien's regulations, together with any conditions, modifications, variances, design review, or special permits that may be required;

(g) the project complies with all applicable local, state, and/or federal laws and regulations, and a Burien SEPA Responsible Official determines that these constitute adequate mitigation; and

(h) the project is not an essential public facility as defined by RCW 36.70A.200 unless the essential public facility is an accessory to or part of a development designated as a Planned Action Project.

(2) Burien shall base its decision to qualify a project as a Planned Action Project on a review of the SEPA Checklist form in WAC 197-11 together with the supplemental Planned Action Ordinance Checklist in Exhibit C, and a review of the Planned Action Project submittal and supporting documentation, provided on Burien's required forms, using the procedures of Subsection 3.G.

F. Effect of Planned Action Designation.

(1) Designation as a Planned Action Project by a Burien SEPA Responsible Official means that a qualifying project application will be reviewed under this ordinance.

(2) Upon determination by a Burien SEPA Responsible Official, under Subsection 3.G, that the project application meets the criteria of Subsection 3.D and qualifies as a Planned Action Project, the project will not require a SEPA threshold determination, preparation of an EIS, or further review under SEPA. Planned Action Projects will remain subject to all other applicable Burien, state, and federal regulatory requirements. The Planned Action Project designation shall not excuse a project from meeting Burien's municipal requirements apart from the SEPA process.

G. Planned Action Project Permit Process. Applications submitted for qualification as a Planned Action Project shall be reviewed under the following process:

(1) Development applications shall meet all applicable requirements of Burien's municipal and zoning codes, and this ordinance is effective at the time of the Planned Action Project application.

(2) Applications for Planned Action Projects shall:

(a) be made on Burien-provided forms;

(b) include the WAC Chapter 197-11 SEPA checklist; and

(c) meet all applicable ordinance and Burien Municipal Code requirements.

(3) A Burien SEPA Responsible Official shall determine whether the application is complete and shall review the application to determine if it is consistent with and meets all of the criteria for qualification as a Planned Action Project provided in this ordinance.

(4) (a) If a Burien SEPA Responsible Official determines that a proposed project qualifies as a Planned Action Project, they shall issue a Determination of Consistency and mail or otherwise verifiably send it to the applicant; the owner of the property listed on the application; and, federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, under RCW 43.21C.440(3)(b).

(b) Upon the Determination of Consistency issuance, the underlying project permit(s) review shall follow the applicable permit review procedures specified in Burien's municipal code, except no SEPA threshold determination, EIS, or additional SEPA review shall be required.

(c) The Determination of Consistency will be valid and effective as long as the underlying project application approval is valid and effective.

(d) Public notice and review for qualified Planned Action Projects shall be tied to the underlying project permit(s). If notice is otherwise required for the underlying permit(s), the notice shall state that the project qualifies as a Planned Action Project. If notice is not required for the underlying project permit(s), no special notice is required.

(5) (a) If a Burien SEPA Responsible Official determines that a proposed project does not qualify as a Planned Action Project, they shall issue a Determination of Inconsistency and shall mail or otherwise verifiably send said Determination to the applicant; the owner of the property listed on the application; and federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, under RCW 43.21C.440(3)(b).

(b) The Determination of Inconsistency shall describe the elements of the Planned Action Project application that fail to qualify as a Planned Action Project.

(c) Upon the Determination of Inconsistency issuance, a Burien SEPA Responsible Official shall prescribe a SEPA review procedure for the non-qualifying project consistent with Burien's SEPA regulations and state law.

(d) A project that fails to qualify as a Planned Action Project may incorporate or use relevant Planned Action EIS elements, and other relevant SEPA documents to meet the non-qualifying project's SEPA requirements. A Burien SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts unaddressed in the Planned Action EIS.

(6) To provide additional certainty about applicable requirements, Burien or the applicant may request consideration and execution of a development agreement for a Planned Action Project, consistent with RCW 36.70B.170, et seq.

(7) A Determination of Consistency or Inconsistency is accomplished consistent with a Type I permit per BMC 19.65.065 and may be appealed under BMC 19.65.065 procedures. An appeal of a Determination of Consistency shall be consolidated with any pre-decision or appeal hearing on the underlying project application.

Section Four. Monitoring and Review.

A. Burien should monitor the progress of development in the designated Planned Action area in association with Burien's periodic review of its Comprehensive Plan to ensure that it is consistent with this ordinance's assumptions and the Planned Action EIS regarding the type and amount of development and associated impacts, the mode and location of person trips, and with the mitigation measures and improvements planned for the Planned Action Area.

B. This Planned Action Ordinance shall be reviewed by a Burien SEPA Responsible Official every five (5) years in conjunction with Burien's regular Comprehensive Plan review cycle or 5-year monitoring report, whichever is first. The review shall determine the continuing relevance of the Planned Action assumptions and findings for environmental conditions in the Planned Action Area, the impacts of development, and required mitigation measures (Exhibit B). Based upon this review, Burien may propose amendments to this ordinance or supplement or revise the Planned Action EIS.

Section Five. Severability. Should a court of competent jurisdiction find any section, paragraph, sentence, clause, or phrase of this ordinance, or its application to any person or circumstance, unconstitutional or otherwise invalid for any reason, or should any portion of this

ordinance be pre-empted by state or federal law or regulation, such decision or pre-emption shall not affect the validity of the remaining parts of this ordinance or its application to other persons or circumstances.

Section Six. Corrections. The City Clerk and codifiers of the ordinance are authorized to make necessary corrections to this ordinance, including, but not limited to, the correction of scrivener/clerical errors, references, ordinance numbering, section/subsection numbers, and any references thereto.

Section Seven. Effective Date. This ordinance shall be published in Burien's official newspaper and take effect five (5) calendar days after publication.

ADOPTED BY THE CITY COUNCIL OF THE CITY OF BURIEN, WASHINGTON, AT A REGULAR BUSINESS MEETING THEREOF THIS 18th DAY OF NOVEMBER 2024.

CITY OF BURIEN

Kevin J. Schilling, Mayor

ATTEST/AUTHENTICATED:

Heather Dumlao, City Clerk, CMC

Approved as to form:



Garmon Newsom II, City Attorney

Filed with the City Clerk: October 4, 2024
Passed by the City Council: November 18, 2024
Ordinance No.: 846
Date of Publication: November 22, 2024

Exhibit A. Planned Action Area

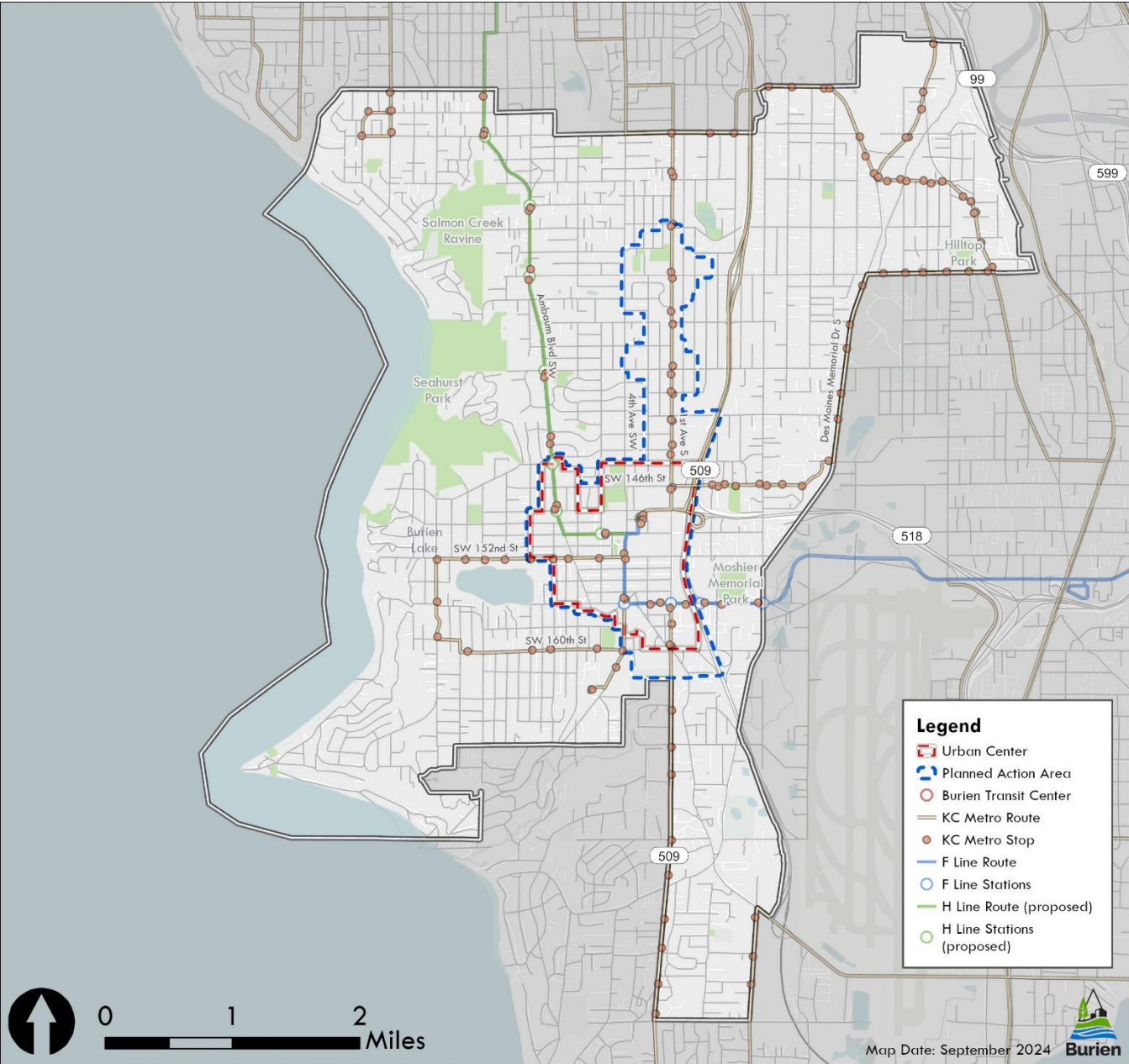


Exhibit B. Mitigation Measures

Introduction

This section includes B-1 Mitigation Measures referenced in the Planned Action EIS and adopted codes and regulations in Section B-2. Performance standards are included to ensure conformity with mitigation measures that were incorporated into the Community Plan and Zoning Code.

Definitions of mitigation measures and performance measures include:

- **Mitigation Measure:** means to prevent, reduce or control adverse environmental effects of a planned action consistent with WAC 197-11-768, as described in the Final EIS and incorporated into Exhibit B of this Ordinance.
- **Performance Measure:** A criterion that a planned action must adhere to in order to demonstrate mitigation is achieved consistent with the Final EIS.

B-1. Mitigation Measures

Natural Environment

1. **Performance Measure – Street Retrofits:** Street frontage improvements shall incorporate incidental flow control and water quality treatment of stormwater to older road sections currently untreated or lacking basic treatment designs.
2. **Performance Measure – Low Impact Development:** Consistent with BMC Chapter 13.10, employ Low Impact Development (LID) techniques such as permeable surfaces and other on-site infiltration methods to improve on-site storage capabilities, reduce impact from increased high flows, and provide water quality benefits.
3. **Performance Measure – Tree Canopy:** Demonstrate consistency with BMC 19.26 Tree Retention and the Burien Urban Center Streetscape Design Plan.
4. **Mitigation Measure – Increased Water Quality Standards:** The City may condition development to apply higher water treatment standards in order to protect vulnerable fish populations and protect water quality from tire rubber-derived chemicals from cars and copper brake pad dust.

Air Quality

Vehicle Miles Traveled Reduction

5. **Performance Measure – Pedestrian and Bicycle Facilities:** As part of frontage requirements complete gaps in the sidewalk and/or bicycle network.
6. **Performance Measure – Implement Building Code Requirements for Electric Vehicle in applicable new developments (including commercial and industrial).**

Building-Related Emissions

7. **Performance Measure – Conform to the Washington Energy Code**

8. Performance Measure – New development shall incorporate at least one measure into building design to implement the Burien Climate Action Plan Strategy B-1.1 and associated actions:
 - A. Achieve one of the following green building standards: Leadership in Energy and Environmental Design (LEED) in Motion: Industrial Facilities, Built Green, the Living Building Challenge, or the Evergreen Sustainable Development Criteria.
 - B. For non-residential and multifamily buildings (20,000 square feet or larger) track and report (annually) energy performance.
 - C. Find operational efficiencies and low- and no-cost solutions to improve building performance, reducing building energy use by at least 10% on a regular basis (1-year or 5-year cycles).
 - D. For new residential and commercial buildings, eliminate the use of natural gas.
 - E. Use low-embodied carbon construction material types, such as low-carbon concrete mixes.
 - F. Limit carbon-intensive materials or incentivize use of lower carbon alternatives such as a wood structure instead of steel and concrete, or agricultural products that sequester carbon.
 - G. Salvage materials like brick, metals, broken concrete, or wood.
 - H. Use high-recycled content materials.
 - I. Prioritize adaptive reuse for existing buildings to avoid additional embodied carbon emissions.
9. Mitigation Measure – Improved Air Filtration: For sensitive lands uses within 500 feet of grade-separated freeways include building ventilation systems that are capable of filtering fine particulate pollutants into HVAC systems to improved indoor quality and reduce exposure to air contaminants. Applicants shall include ventilation systems with a higher Minimum Efficiency Reporting Value (MERV) are capable of removing finer particulate matter from indoor air. Specifically, U.S. EPA recommends higher efficiency filters with a MERV rating of 13 or higher for HVAC filtration (U.S. EPA, 2023). The 2016 ASHRAE handbook for HVAC Systems and Equipment includes air cleaners with MERV ratings in the E-2 range (MERV 9 -12) for application in better residential and industrial air cleaning, which are effective for particulates in the 1.0 to 3.0 μm size range, while those in the E-1 range (MERV 13 – 16) control finer particulates (ASHRAE, 2016).

Noise

10. Mitigation Measure – Noise Studies and Abatement:
 - A. Aircraft noise: Exposure to aircraft noise shall be mitigated through the application of standards in BMC Chapter 15.12 Aircraft Noise Reduction.
 - B. Highway noise and residential uses: The City shall require noise studies and mitigation for all residential or mixed use development where the projected exterior noise levels exceed a day-night average sound level (Ldn) of 65 dB, and interior noise levels within residences exceed 45dB. The City may require building design or material that reduces interior noise levels to meet the standards. Outdoor noise levels may be mitigated per Highway Noise Exposure Reduction measures below.
11. Mitigation Measure – Highway Noise Exposure Reduction: Within 500-feet of a grade-separated freeway, applicants shall demonstrate all feasible site planning techniques are included such as:

- a. Increase the distance from the road.
- b. Place noise compatible land uses such as parking lots, maintenance facilities, and utility areas between the road and the residences.
- c. Use buildings or berms as noise shields by locating them parallel to the road. (Note, this is an effective strategy for roads, but is ineffective from aircraft noise.) Soundproof the building if it contains residences.
- d. Locate residences in topographically low points that are naturally low noise pockets if they exist.
- e. Orient the residences—and spaces within the building that benefit from quieter volumes (bedrooms and living rooms)—away from the noise.
- f. Use cluster and planned unit development techniques to accomplish combinations of the above.

Aesthetics

- 12. Mitigation Measure – Solar Access to Public Spaces: Where development has the potential to cause shade to existing or planned future public gathering places, such as a plaza along a pedestrian-oriented street the City may require a shade/shadow analysis and require alternative building orientation and upper-story step backs to improve public space wintertime solar access while allowing the rest of the street to be shadowed. This type of standard should be required on large lots or lot aggregations where such designs can feasibly be accommodated or when a public-private partnership improves feasibility.

Transportation

- 13. Performance Measure: Planned Action applications shall demonstrate consistency with frontage and street design standards established in the Title 19 for applicable community plan, zoning code, and design standards.
- 14. Performance Measure: Where a Planned Action development's street frontage includes an existing or planned transit stop, such development shall be conditioned to install transit stops to the standards of King County Metro.
- 15. Performance Measure: The City shall condition Planned Action applications to:
 - A. Implement system transportation improvements related to growth in the subarea. A Planned Action Project's responsibility to provide for system improvements is based on the payment of citywide impact fees for improvements included therein. In addition, the Planned Action Project shall pay its fair share of system improvements not included in the citywide impact fee in proportion to the person trips generated to support necessary improvements identified in the Transportation Master Plan (2024) and the Burien 2044 Comprehensive Plan EIS Transportation Improvements in Table B-1. Fair share shall be determined based on the demand of the development based on the City's adopted levels of service.
 - B. Provide site specific mitigation consistent with City standards. The City shall require safe and efficient circulation and site access and improvements attributable to individual developments in order to meet:
 - i. Burien 2016 Road Design and Construction Standards, or as thereafter amended

- ii. Burien Urban Center Streetscape Design Plan, 2021, or as thereafter amended
- iii. Downtown Burien Design Manual, March 2000, or as thereafter amended
- iv. Chapter 19.47 BMC Downtown Design Standards
- v. BMC 12.45 Complete Streets
- vi. BMC Chapter 19.70 Adequacy of Public Facilities and Services

Table B-1. Transportation Improvements – Burien 2044 Comprehensive Plan Update EIS

Mitigation	Description
Construct New Signals	Under both Alternative 1 No Action and Alternative 3, the all-way-stop intersection at 8th Avenue S and S 112th Street and the two-way-stop intersection at Des Moines Memorial Dr S and State Route 518 off Ramp are expected to perform at LOS F (below the City's standard of LOS D). The City could install signals to address the congestion, reduce delays, and mitigate the potential impact. The impact at the 6th Avenue SW and SW 148th Street intersection could also be mitigated by installing a new signal. This mitigation strategy aligns with Burien's 2022-2027 TIP project No.12.0 which commits to add a new signal with a protected left turn¹. Specific implementation of this improvement is currently under design.
Signal Timing Modifications to Address Delay	To address delays related to congestion at multiple intersections, the City could explore signal timing modifications to mitigate the impacts. The signalized intersection at 1st Avenue S and SW 148th Street is expected to perform at LOS F in both alternatives. Signal timing adjustments at this location could yield an improved LOS to meet the standard.
Intersection Channelization Improvements to Address Delay	The intersection at 1st Avenue S and SW 128th Street is expected to operate at LOS F in both Alternative 1 No Action and Alternative 3 (below the City's standard of LOS D). Under both alternatives, higher volumes of westbound traffic are anticipated to turn right. The City could address this issue by adding a westbound right-turn pocket on SW 128th Street to reduce delay. Adding a right-turn pocket in the Synchro 11 model for this intersection allows it to operate at LOS D and meet the City's standard in Alternative 1. In Alternative 3, adding the turn pocket would allow the intersection to have an average delay of less than 60 seconds at LOS E. While it is not meeting the City's standard of LOS D with a threshold of 55 seconds, programmatic changes in the city could further reduce the delay to meet the City's standard. The City's TIP includes this location for reconstruction, which could reduce the delay and improve LOS to meet the standard.
Install Roundabout	A roundabout is anticipated to address the impact at the intersection of 24th Avenue S and S 116th Street. The intersection is expected to perform at LOS E and LOS F respectively under Alternative 1 No Action and Alternative 3. By changing the control type to a one-lane roundabout, traffic analysis indicates the intersection could improve to LOS A with a delay of 4 seconds in both future alternatives. This mitigation strategy has been incorporated with the City's 2024-2029 TIP project No.21.

¹ See: https://cdnsnm5-hosted.civildive.com/UserFiles/Servers/Server_11045935/File/Residents/Public%20Works/Master%20and%20Facility%20Plans/TIP%202022-2027.pdf.

Mitigation	Description
Multimodal and Active Transportation Improvements	See the Transportation Master Plan

Public Services

16. Performance Measure – Parks and Open Space: Planned Action applications shall demonstrate consistency with on-site open space requirements in the Zoning Code including BMC 19.17.010 and 19.17.013 as appropriate. For up to half of the required onsite open space, the City may allow a voluntary fee in lieu agreement for multifamily or mixed use projects that implement improvements in the Parks, Recreation, and Open Space Plan, March 2024, or as thereafter amended, where such improvements are implemented within a half mile of the project site.
17. Performance Measure – Adequate Fire Protection: Development shall ensure consistency with the Fire Code and fire flow. The City may require a mitigation agreement between the Planned Action Project developer and Fire District 2 prior to development to address needed capital investments at stations serving the Study Area (e.g., stations and ladder trucks or other).

Utilities: Surface Water and Stormwater

18. Performance Measure – Stormwater Manual. The City shall apply the stormwater management manual in effect at the time of proposal application.
19. Mitigation Measure – Priority Storm Drainage Improvements: Planned Action applications shall demonstrate implementation of their fair share of priority improvements in Study 1 and Study 2, Burien 2020 Storm Drainage Master Plan Update. The fair share shall be determined by the Public Works Director or their designee based on the proposal's contribution to stormwater runoff and water quality treatment.
20. Mitigation Measure – Downtown SMAP Retrofits: Planned Action applications shall implement their fair share of stormwater retrofit projects identified in the Downtown Burien Stormwater Management Action Plan (SMAP) and include retrofits into required street frontage improvements. The fair share shall be determined by the Public Works Director or their designee based on the proposal's contribution to stormwater runoff and water quality treatment.
- A. Short-term: Stormwater retrofit projects including Dottie Harper Park Water Quality and Flow Control Retrofit, Water Quality Retrofits for Alleys between SW 152nd Street and SW 153rd Street and Ambaum Regional Pond Water Quality Retrofit.
 - B. Long-term: includes additional retrofit projects along streets in the downtown area, stormwater tree planters along sidewalks, permeable pavements for transportation and park projects, and below ground facilities in parking lots and alleys and sidewalks.
21. Mitigation Measure – Areas Lacking Flow Control or Water Quality Treatment: Development applications within areas that currently have no flow control or water quality treatment systems shall implement retrofit systems to detain and/or treat runoff before it is released into creeks, especially within the Miller/Walker Creek basin. These systems may be located within planter areas or unimproved roadside shoulders and ditches, and should include shallow bioretention cells, infiltration

trenches, or proprietary treatment best management practices (BMPs) for water pollution, such as Filterras or Modular Wetlands.

22. Mitigation Measure – Stormwater Best Management Practices (BMPs): Planned Action Applicants shall demonstrate all feasible use of stormwater BMPs that utilize trees (such as Silva Cells) before other water quality BMPs.
23. Mitigation Measure – Regional Flow Control Facility: If a regional flow control facility is approved by the City, an applicant may request or the City may condition development to pay a fee based on the area of new and replaced impervious surface subject to the stormwater management manual in place at the time of application.

Utilities: Water & Sewer

24. Performance Standard – Adequate Water and Sewer Facilities: Planned Action applicants shall demonstrate conformance with Chapter 19.70 Adequacy of Public Facilities and Services and City of Burien Municipal Code Title 13, Water and Sewers. Planned Actions may be conditioned to implement special district utility standards and requirements.

B-2. Codes and Regulations Serving as Mitigation

The Planned Action EIS identifies specific regulations that act as mitigation measures. These are summarized below EIS topic. All applicable federal, state, and local regulations shall apply to Planned Action Projects. Planned Action Project applicants shall comply with all adopted regulations in place at time of development application where applicable including those listed in the Planned Action EIS and those not included in the Planned Action EIS.

Natural Environment

- Surface Water Management Code: BMC 13.10 establishes requirements for drainage plans, critical drainage areas and construction timing.
- Stormwater Management Code: BMC 13.10 also prohibits the discharge of contaminants into surface water, stormwater and groundwater and outlines preventive source control measures to restrict contaminants from entering such waters.
- Surface Water Design Standards: As of May 16, 2022, all new and redevelopment construction projects, both private and public, must comply with the 2021 King County Surface Water Design Manual.
- Critical Areas Regulations: Burien Zoning Code Chapter 19.40 establishes development standards for critical areas, including erosion hazard areas, frequently flooded areas, landslide hazard areas, critical aquifer recharge areas (CARAs), wetlands, fish and wildlife habitat conservation areas and corridors, and streams.
- Surface Water Management Program: The City's Storm and Surface Water Management Program addresses storm and surface water quality and quantity in the city. The program reviews proposed development and monitors construction and water quality, implements stormwater control projects, and conducts a variety of stormwater related programs and plans. The program is developed in accordance with the National Pollutant Discharge Elimination System (NPDES) Phase II Western

Washington Municipal Stormwater Permit (Phase II permit) and is a requirement of the federal Clean Water Act.

- Authority for project-level mitigation is provided by, among others, the City's Shoreline Master Program, Public Works Standard Specifications, Zoning Code and Noise Ordinance.
- US Fish and Wildlife Service and/or the National Marine Fisheries Service, for federally permitted actions that could affect endangered species (i.e., salmon).

Air Quality

- PSCAA Regulations: All construction sites in the Puget Sound region are required to implement emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures.
- PSCAA manages permitting of stationary air pollutant sources and all industrial and commercial air pollutant sources in the Puget Sound region are required to register with the PSCAA.
- Washington State Energy Code: Development in the study area would be subject to the requirements of the Washington State Energy Code, which regulates the energy-use features of new and remodeled buildings.

Land Use Patterns/Socioeconomics

- The City implements a zoning code in Title 19 and applies standards such as landscaping, tree protection, recreation space, signage, Downtown / Urban Center street frontage improvements for pedestrians, and others. The intent is to provide for features of the built environment that positively contribute to quality of life.
- The City adopts a Shoreline Master Program in Title 20. It provides goals, policies, and development regulations for development around Lake Burien and the marine shoreline.
- The Burien Zoning Code provides opportunities for housing and business establishment, and existing building expansions.
- Chapter 15.40 BMC, the Burien Building and Property Maintenance Code, provides for quality structures to protect tenant health and safety, consistent with the Washington State Landlord Tenant Act.
- Local governments, authorized by WAC 365-196-835 and detailed in RCW 59.18.440, can pass an ordinance that requires developers, public funds, or a combination of the two to provide relocation funds for these displaced tenants.]
- Chapter 19.45 establishing a multifamily tax exemption applicable to the planned action area.

Noise

- State noise regulations establish exterior sound level limits for various land uses varying depending on the noise source and receiving land use. See Table B-2. These limits are intended to result in acceptably low interior noise levels for residences and other sensitive noise receptors.

Table B-2. Maximum Permissible Noise Level

Source of Noise	EDNA Receiver of Noise (Maximum Allowable Sound Level in dBA Leq)		
	Residential	Commercial	Industrial
Class A Residential	55	57	60
Class B Commercial	57	60	65
Class C Industrial	60	65	70

Source: WAC Chapter 173-60, 2023.

- City noise regulations also address construction noise, limiting the times during the day when construction noise can occur.
- New development within the City's designated airport noise reduction areas would also be required to comply with the minimum noise insulation requirements as established in BMC Section 15.12.080.

Aesthetics and Urban Design

- Burien's current zone transition development standards are intended to make the transition in scale take place over a larger area. They limit height in the more intense zone where it abuts a less intense zone, and require landscape buffering, façade modulation, and roofline variation (see BMC 19.17.015).
- See Ordinance Title 19 for applicable zoning code and design standards adopted for the Greater Downtown Urban Center Area.

Transportation

- Burien implements Commute Trip Reduction at Chapter 10.60 BMC.
- The Capital Facility Element identifies planned improvements that are part of the transportation impact fee. The Transportation Improvement Program also identifies planned improvements.

Public Services

- BPD offers crime prevention services through their Community Crime Prevention Unit. These officers are specifically trained in crime prevention techniques and work with neighborhood organizations and other community groups to provide services and events. Burien Police have made a commitment through the introduction of this unit to help identify risks and reduce crime before it occurs. (BPD Website)
- Police enforcement is governed in part by Title 9 Public Peace, Morals and Welfare.
- Fire and emergency service provision to new development is governed by BMC 19.70.110 Adequate Fire Protection and BMC 15.20 Fire Code. The City considers adequacy of fire flow and building protection measures at BMC 19.70.110 Adequate Fire Protection. Through this code the City could condition development, such as high-rise construction under Alternative 3 in the Urban Center, to ensure appropriate apparatus serve the area.

- Pursuant to Burien Municipal Code Chapter 15.20.200, Burien has adopted all standards of the 2018 International Fire code as well as the Washington State Building Code. Commitments include the following:
 - Fire-flow requirements for buildings
 - Fire hydrant locations and distribution
 - Fire apparatus access roads
 - Hazardous materials Management Plans and Inventory Statements
 - High-Rise Buildings and Automatic Sprinkler Systems
- Other additional regulations and commitments are detailed in Chapter 15.20 of Burien Municipal Code. Future upgrades, capital investments, regulations, and commitments are also outlined specifically in the adopted Burien Capital Facilities Plan.
- Ongoing Highline Public Schools capital facilities management planning is required to address increases in student population. Capital planning is currently ongoing with the Highline Public Schools Capital Facility Advisory Committee and is in the process of preparing an updated Capital Facilities Plan for the District. The CFAC prepares capital plans and projects that are funded by voter-approved bonds. 2022 capital projects include a new middle school expected to be constructed in 2027.
- Aside from the ongoing updates to the Highline Capital Facilities Plan, the district has also recently updated several board policies in their 2023 Strategic Plan. The policies relate to equity, student learning goals, improvement plans, and several other subjects. ([Highline Board Policies, 2023](#))
- The City requires onsite recreation space through its zoning code including:
 - 19.17.010 Multi-Family Recreation Space
 - 19.17.013 Residential Recreation Space
- The City has a 2024 PROS Plan that guides investments in parks and recreation facilities and seeks grants.

Utilities

Plans and regulations adopted at the time development permits are submitted will be applicable, including but not limited to:

- 1972 Clean Water Act (CWA)
- Phase II of the National Pollutant Discharge Elimination System (NPDES) permit program. Under this set of regulations, the City maintains measures to protect and improve runoff conditions in relation to the receiving waters.
- Endangered Species Act – 6PPD-Q is an identified pollutant with significant impact to salmon. Regulations and the resulting treatment and mitigation measures are currently being developed as of 2024. However, increased water quality treatment is anticipated as a result (see mitigation measures).
- WAC 365-196-420, which requires that the utilities element of a comprehensive plan contain the general location, proposed location, and capacity of all existing and proposed utilities.

- RCW 90.48.035 provides the Washington State Department of Ecology rule-making authority to regulate water quality standards; implemented by WAC 173-240-010.
- The Washington State Department of Ecology maintains the Surface Water Management Manual for Western Washington and manages the NPDES permit program.
- Burien 13.10 Surface Water Management - contains stormwater management regulations for development and redevelopment; it codifies the 2021 King County Surface Water Design Manual (“KCSWDM”) and the 2021 King County Stormwater Pollution Prevention Manual (“KCSPPM”) are hereby adopted by reference as, respectively, the City of Burien Surface Water Design Manual (“SWDM”) and the City of Burien Stormwater Pollution Prevention Manual (“SPPM”) with modifications.
- City of Burien Municipal Code Title 13, Water and Sewers
- City of Burien Municipal Code Chapter 19.70, Adequacy of Public Facilities and Services
- City of Burien Municipal Code Chapter 19.40, Critical Areas
- King County Code
 - King County Wastewater Treatment Division
 - 2013 Regional Wastewater Services Plan Comprehensive Review
 - Wastewater Services Plan 2017 Annual Report
 - Regional Needs Assessment, Conveyance System Improvements Program, May 2015
 - 2017 Conveyance System Improvements (CSI) Program Update
- City of Burien 2020 Master Drainage Plan and 2023 SMAP
- 2006 Miller and Walker Creek Basin Plan
- 2021 King County Surface Water Design Manual (adopted in BMC 13.10.020)
- City of Burien and Seattle City Light Franchise Agreement
- City of Burien 2016 Road Design and Construction Standards
- City of Burien 2016 Road Design and Construction Standards require minimum lighting levels for roadways for proposed projects.
- Compliance with Utility District Plans and Documents per Table B-3 or as amended.

Table B-3. Utility District Plans and Documents

Document Title	Year (as amended)
Highline Annual Report	2020
Highline Water District Water System Plan	2016
Water District No. 20 Water System Plan (Ch 4)	2023 DRAFT
Water District No. 20 Water System Plan (Ch 7)	2023 DRAFT
Water District No. 49 Water System Plan	2019
Water District No. 125 Water System Plan	2020

Document Title	Year (as amended)
Seattle Public Utilities Water System Plan	2019
Long-Range Water Demand Forecast	2019
Midway Sewer General Sewer Plan	2018
SWSSD Comprehensive Sewer Plan	2015
Valley View Plan Annex	2019
Valley View General Sewer Plan (Ch 7)	2023 DRAFT
Valley View General Sewer Plan (CIP Map	2023 DRAFT

Exhibit C Supplemental Checklist

This form supplements the standard SEPA Checklist at [WAC 197-11-960](#). This form supports the City's determination of consistency. The applicant shall fill in fields referenced for applicants. City staff shall complete the consistency fields referenced.

Table C-1. Proposal Elements and Planned Action Consistency

Proposal	Applicant Information	Consistency (City to Complete)
Property Information	Address:	In Planned Action Area?
	Parcel #:	☐ Yes
	Parcel Acres:	☐ No
Land Use	Dwellings # (Net)	Consistent with Planned Action Land Uses and BMC?
	▪ Attached:	☐ Yes
	▪ Detached:	☐ No
	Employment Sq Ft (Net):	Beginning Housing Unit Balance:
	▪ Office	Post Project Housing Unit Balance #:
	▪ Retail	
	▪ Industrial	Beginning Job Balance:
	Average Tenant Space Sq Ft:	
	Estimated Jobs (Net):	Post Project Job Balance #:
	Building Height Ft:	
	Stories #:	
Transportation	Frontage Type:	Traffic Impact Fee Addresses Project Contribution to System Need:
	Transportation Impact Fee Due:	☐ Yes
		☐ No
	Transportation Improvements required per Table B-1 or City standards to address safety, circulation, and access:	
Parks, Stormwater, Utilities	Plaza/Onsite Open Space Sq Ft:	Fire Service Adequacy?
	Water Adequacy Certificate?	☐ Yes
	☐ Yes	☐ No
	☐ No	Parks and Open Space Adequacy?
	Sewer Adequacy Certificate?	☐ Yes
	☐ Yes	☐ No
	☐ No	Safe routes to schools provided?
		☐ Yes
		☐ No

Table C-1 Applicant Narrative

Table C-1 City Discussion

E-2. Mitigation Measure Consistency

EIS Topic	Description of Exhibit B Mitigation (Applicant Information)	Consistent (City to Complete)	Discussion (City to Complete)
Natural Environment		☐ Yes ☐ No	
Air Quality		☐ Yes ☐ No	
Noise		☐ Yes ☐ No	
Aesthetics		☐ Yes ☐ No	
Transportation		☐ Yes ☐ No	
Public Services		☐ Yes ☐ No	
Surface Water and Stormwater		☐ Yes ☐ No	
Water and Sewer		☐ Yes ☐ No	

Table C-2 Applicant Narrative

Table C-2 City Discussion

E Comments After DEIS Comment Period

Appendices

This appendix contains written comments received by Burien after the close of the 60-day comment period on the January 2024 Draft Plan and Draft EIS. These comments were from agencies and local residents. The written comments resulted in edits to the Draft Plan for review by the Planning Commission (comments related to the hearing on June 26, 2024) or the City Council (comments received July 2024 through the hearing on October 7, 2024). These comments are not part of the Draft EIS 60-day record but are part of the planning process. The original emails and letters follow this table. Verbal comments made at public meetings or hearings are similar to the written comments overall; the videos of Planning commission and City Council may be viewed at the Burien Channel: <https://cloud.castus.tv/vod/burien?page=HOME>.

Exhibit 5.2-1. Comments Received after 60-Day Draft EIS Comment Period

Date	Name/Agency	Comment Summary	Response
Agencies			
June 11, 2024	King County Affordable Housing Committee	Recommendations to Align with the CPP Housing Chapter 1. Prioritize extremely low-income households (CPP H-2) 2. Complete the housing inventory and analysis (CPP H-3): Items d, e, g, j 3. Address gaps in emergency housing (CPPs H-1, H-4, H-9, H-11, and H-12) 4. Explicitly plan for and prioritize income-restricted housing (CPPs H-10, H-14, and H-17) 5. Increase housing choice near employment opportunities (CPP H-15)	The Draft Housing Element was amended: ► Added three policies to promote extremely low income housing. ► Added more policies on permanent supportive housing and emergency and transitional housing. ► Data on disabilities added as well as a policy promoting universal design. ► Additional multifamily tax exemption policy to increase affordable housing incentives. ► Added three additional policies to conserve and expand income-restricted housing. ► Folded in Draft EIS mitigation measures as anti-displacement policies. ► Added a policy to support diverse household sizes per CPP H-10. ► Housing in proximity to job centers – add a policy per CPP H-15. There are other supportive policies in the Economic Development Element. ► Units in proximity to transit were added similar to the Draft EIS including the Preferred Calculations and a table of income restricted units citywide and in proximity to transit based on the racially disparate impacts analysis 2023.
August 30, 2024	Puget Sound Regional Council	The plan should clarify the growth assumptions used in transportation modeling and demonstrate consistency with the rest of the comprehensive plan and growth targets from the county.	In the Transportation Element and Transportation Master Plan: ► The growth target assumptions were added.

Date	Name/Agency	Comment Summary	Response
		The plan should include a policy to prioritize investments in designated regional and countywide centers, consistent with regional policy. The plan should include a mapped inventory of all transit facilities, including both the transit network and information on service. The plan should include additional information about land uses adjacent to Sea-Tac Airport and policies and regulations to discourage incompatible uses. PSRC's Airport Compatible Land Use Report provides information about planning adjacent to airports. Many required components of the transportation element are included in the city's Transportation Master Plan. This plan should be adopted by reference into the comprehensive plan.	▶ Reference is made to the Burien Regional Growth center rather than downtown. ▶ Policies addressing the airport and the need for reducing environmental health exposures. ▶ A transit map was added to the Transportation Master Plan. ▶ The Transportation Master Plan is incorporated by reference into the Comprehensive Plan.
September 30, 2024	Washington Department of Commerce	We have two concerns that you should address before you adopt your plan and development regulation amendments: ▶ According to Burien Municipal Code (BMC) Chapter 19.35, Transportation Impact Fees are collected. The draft Capital Facilities Plan does not explicitly identify which transportation projects are funded by transportation impact fees collected as required by RCW 82.02.050(5). We recommend identifying which transportation projects will receive funding from impact fees collected. ▶ Please update your draft development regulation amendments to allow permanent supportive housing and transitional housing, as well as emergency housing and shelter, in the appropriate zones, per RCW 35A.21.430. We have a couple suggestions for strengthening your plan that we now or in future amendments: ▶ While the Adequate Provisions Checklists were submitted to Commerce (Appendix B), this appendix is not referenced in the draft comprehensive plan draft.	Traffic Impact Fees: Per the Draft Capital Facility Plan, the City adopted a Traffic Impact Fee in Chapter 19.35 of the municipal code. Between 2018 and 2022, the City allocated between \$63,000 and \$99,000 in Traffic Impact Fees to the Transportation Capital Fund. Traffic Impact Fee revenue is not included in the 2023-2028 Capital Improvement Plan. The City could amend Traffic Impact Fees to update its needs and help finance transportation capital improvements related to growth. As the City's code currently stands, transportation impact fees are funding projects based on the Transportation Impact Fee Project List, adopted in 2008 and revised in 2016. As the City's project list has grown and shifted in recent years, the City is considering updating the transportation impact fee rate study and corresponding project list in the next few years to embrace multimodal transportation projects. Until then, the City will continue to collect based on the codified project list. Permanent supportive housing and transitional housing and emergency housing and shelters: The City is in progress with the regulations for STEP housing and intends to complete it by years end.

Appendices

Date	Name/Agency	Comment Summary	Response
		Please reference Appendix B in your draft comp plan and add it to the Appendices section of the plan. ► 2. An inventory of existing capital facilities owned by public entities, including green infrastructure, is required under RCW 36.70A.070(3)(a) (as amended in 2023) and WAC 365-196-415(a). Within the inventory, we suggest identifying which facilities are "green infrastructure" according to the statutory definition.	Adequate Provisions: The Draft Plan now includes the Adequate Provisions Checklists in the Appendix. Green Infrastructure: Though this requirement may not apply until 2029 per HB 1181, the City has addressed green infrastructure in its stormwater plans and has included this in the revised Draft Capital Facilities Plan.
Planning Commission Hearing Correspondence			
June 19, 2024	Jenny Partch	Highline United Methodist Church is located at 13015 1st Ave S which would be MU-1. We are planning to redevelop our property to have a multi-level building with commercial space on the ground level for non-profits with affordable housing apartments above. In order for a housing provider to build affordable apartments having a higher height limit will be essential. We ask that you consider extending the MU-2 zone south on 1st Ave S to S 130th Pl.	The Planning Commission recommended MU-2 for the properties. See the Preferred Alternative.
June 24, 2024	A. Anderson	Community Priorities for Boulevard Park: ► Need an indoor community area specifically for teens. ► Need a grocery store. ► Lack of bike lanes. ► Need for an updated and efficient sewer system. ► Speeding is another serious concern. ► Request increased police presence.	The Ambaum Boulevard Park Community Plan, Parks Plan and Transportation Master Plan do address additional mixed use commercial services, improved pedestrian and bicycle lanes, extension of sewer, and other suggestions. Public safety is addressed in the Comprehensive Plan. The City establishes police service levels in its contract with the King County Sheriff.
June 24, 2024	JoAnn Pasek	From 6th to 8th and 146th to 148th, remove from Urban Center. See petition.	The Planning Commission recommended to exclude the block from the Urban Center. One block face was kept as Mixed Use. See the Preferred Alternative.

Appendices

Date	Name/Agency	Comment Summary	Response
June 24, 2024	Charles Schaefer	Change the areas designated Residential Medium / R-4 in the Sunnydale neighborhood (the area bordered by SR 509, SR 518, 8th Ave S / Des Moines Memorial Drive, and S 160th St; I have attached a zoomed in section of your draft zoning map below) to Commercial Mixed Use / MU-1.	The Planning Commission recommended to incorporate the request. See the Preferred Alternative.
June 25, 2024	Yosuf Kushan	The unpaved Public land S 120th St is frequently used as dumping grounds for abandoned vehicles, trash and litter. This vicinity is also lacking public green spaces for residents such as parks and outdoor amenities. I would like to recommend the planning commission a solution which will keep our community green, clean, safe and walkable- A Community Garden to replace the unpaved side street on S 120th St.	The Draft Comprehensive Plan promotes community gardens such as: ► Policy 7.2-4 Support opportunities for community gardens and food foraging (e.g., fruit and nut trees).
June 26, 2024	Michael S.	Homeowner on SW 139th St. who would be impacted by the up zone to R4. Concerned about height, density, parking, and future increases in taxes and costs for persons with fixed or lower incomes. This particular area between SW137th and SW142nd can handle some increased density via ADU/DADU's, duplexes and triplexes. But not at the level being proposed.	Please see the presentation for the June 26, 2024 Planning Commission hearing. ⁸The Residential Medium designation in the Community Plan draft was modified to refer to low-rise than high-rise. A number of areas along the Ambaum Corridor were changed from R-4 to R-3 in the Preferred Alternative and multifamily and mixed use zoning.
Council Review Sessions Correspondence			
August 7, 2024	Dr. C. Edgar	A clearer and more delineated version of the draft 2024 Land Use Map-the version sent on to the Council by the Planning Commission. I had a question about the strange draft Land Use Change that appears to be reflected in this draft 2024 Land Use Map for the Gregory Heights Neighborhood to the city of Normandy Park boundary changing lot sizes from 7200' Medium Residential to 12,000' Residential Low 1per color key change? See page 5	The Land Use Map included in the plan is included on a letter size page and shows the categories without details. However, the map referenced is also available in an interactive map tool, prepared during the Planning Commission process and included in Planning Commission and City Council memos. See the link below in the footnote.⁹ Additionally a map with parcels has been provided in City Council packets, and is in Appendix A of this Final EIS.

⁸ See videos of each Planning Commission meeting at this link:
<https://cloud.castus.tv/vod/burien/video/61b63c6cd765b900092c34e6?page=HOME&type=live>.

⁹ See: <https://berk.maps.arcgis.com/apps/instant/basic/index.html?appid=10e1b79b4f2d4a64b4126f01c8922b34>.

Appendices

Date	Name/Agency	Comment Summary	Response
		of 88 of the July 31, 2024 Memo that Liz Stead included in the Aug. 5, 2024 Council meeting agenda packet. The maps included in this Memo packet are very difficult to read clearly.	The City has identified on the Future Land Use Map designations of Residential Low 1 and 2 (RL 1 and RL 2). The descriptions of these designations are shown in the Draft Land Use Element and summarized in Exhibit 1.4 5. The designations help the City address recent legislation to allow more moderate density/middle housing dwelling unit types in single-family areas. The designations have not yet been implemented by zoning and are not necessarily a match to RS 7200 and RS 12000 zones. The implementing zoning is anticipated in mid-2025.
August 14, 2024	Dr. C. Edgar	Looked over your agenda for tonight on the topic of STEP housing. Burien for years has had a fair amount of Transitional Housing the Planning Dept. overlooks and doesn't put in its reports. Perhaps they don't know about it? It is the housing owned and operated through NAVOS. And again, I don't see it displayed on the chart in the agenda packet.	The STEP housing proposal is underway consistent with the requirements in HB 1220.
August 19, 2024	Dr. C. Edgar	1.The Land Use in my Lake Burien neighborhood appears to be changed in several areas of the neighborhood in this 2044 draft. The current land use map showing the neighborhood is not accurate or correct according to the current LU-1- as shown in the Burien Map Library. Also, there is no Zoning Map or Zoning table in this draft that accurately depicts the Zoning. 2. To the best of my knowledge, the Planning Commission appears to have used an inaccurate LU-1 Map (alternative 1) and an inaccurate interactive map developed by the consultant (it failed to accurately show my neighborhood as Critical Area) plus the alternative map 2 and alternative map 3 (I am not sure where these two maps historically came from). They appear to be a 2023 invention of Berk and Maker, then struck out and then were used to decide about what the draft land use would be for the 2044 draft Plan-Land Use Map- but not based on accurate/actual land use, critical areas and zoning information. 3. I mentioned to Liz Stead that I and	#1: See Draft EIS <i>Exhibit 2.3 1. Adopted Comprehensive Plan Map</i> , also appearing in a summary form in <i>Exhibit 2.3 2. Consolidated No Action Comprehensive Plan Map</i> for a comparison to the other alternatives. The current zoning was published as <i>Exhibit 2.3-5 Burien Zoning Map</i> in the Draft EIS. Regarding the Preferred Future Land Use Plan, it differs from the adopted Future Land Use Map and proposed Residential Low 2. RL 2 was also studied around Lake Burien in Draft EIS Alternative 2. #2: Critical areas are defined in the Burien Municipal Code and mapped by the City. Critical areas regulations apply where the critical area is found whether mapped or unmapped. Zoning maps including the adopted zoning map do not show critical areas. Alternatives 2 and 3 were developed based on public engagement efforts including the Advisory Committee and Planning Commission in 2023. The commenter attended at least one of the Advisory Committee meetings on June 28, 2024, per an email to Susan

Date	Name/Agency	Comment Summary	Response
		my neighborhood members had not received notice about this draft Land Use change and Zoning table change. 4. While I attended a couple of community meeting at the Burien Library and provided written input to Berk and the city staff, I had not received any information about the draft EIS for this draft Plan or about the EIS hearing which discussed how the draft Land Use map was established. 5. The changes proposed in this draft Comp Plan for the Lake Burien Neighborhood do not appear to me to be appropriate or consistent with the SMP and the GMA. (See original comments for additional concerns about notice similar to #4). #6: Return Planning Area 2 (SPA 2) to prior designation. The stormwater map should be amended. Request to amend distribution list and media and ensure commenter and property owners are added to contact list. #7: Land Use and Zoning changes that appears to have happened to the Gregory Heights Neighborhood up to the Normandy Park Boundary (in this draft as displayed on the draft Land Use Map) should be reevaluated by the Commission.	McLain and Michele Barrera on July 3, 2023. #3: There are no proposed zoning changes to the Lake Burien neighborhood currently. There are proposed Land Use Designation Map changes reflected in the Comprehensive Plan along the north side of Lake Burien to Residential Low 2. Burien Municipal Code (BMC) 19.65 does not require site specific notice for areawide designation changes. The City developed a public engagement plan, shared with the prior Planning Commission in 2022 and the new Planning Commission in 2024.¹⁰ The City engaged an Advisory Committee as part of its engagement plan. We note that Dr. Edgar inquired about the Advisory Committee on June 28, 2023 and provided comments to the Committee at that time. In addition to providing a website and maintaining a listserv, holding special events such as open houses, and developing an Advisory Committee, the City has published notices of hearings or notices of availability of the Draft EIS in the newspaper and at its public notice site.¹¹ While Draft EIS comments were not received during the Comment Period, the City is voluntarily including the comments and responses in this Final EIS appendix. The history of zoning around Lake Burien including the downzoning in Ordinance 614 is included as part of a history of zoning in Comprehensive Plan Appendix B, <i>Burien Housing Policy Evaluation: Racially Disparate Impacts, Displacement, and Exclusion in Housing</i>, page 2-8. #5: See the discussion of HB 1110 above regarding new housing types meant to reduce barriers to ownership housing and to respond to the Racially Disparate Impacts evaluation.

¹⁰ The most recent copy is here: <https://burienwa.civicweb.net/filepro/documents/194578/?preview=194579>

¹¹ See: https://www.burienwa.gov/news_events/public_notice.

Appendices

Date	Name/Agency	Comment Summary	Response
			Also, the SMP standards act as an overlay on top of the Future Land Use Plan and Zoning Map, both today and in the future as the plan and regulations are adopted. #6: As part of map corrections for medical related sites, the Preferred Alternative developed for the City Council proposes a Future Land Use Map designation of Commercial/Mixed Use but proposed zoning retains SPA-2 for zoning purposes. See the September 7, 2024 City Council packet. #7: Comments are forwarded to the City Council including preferences for policy choices and growth strategies.
August 19, 2024	Ginele Marquez Lee	In the comprehensive plan, the maps are blurry when downloading from the agenda site. Is there somewhere I can download something legible. I'm looking at the critical areas maps page 81, 83, and 86 and it is blurry and unclear quality. Oh, and also where I can get the "2020 storm drainage master plan"	The City's critical areas map are available at the City's website. See footnote for link.¹² The 2020 Storm Drainage Master Plan is available at the City's website. See footnote for link.¹³
August 24 & 29, 2024	Diane Wilson	The biggest concern is what is the procedure for notification and did the City follow that as it relates to the changes proposed in the Lake Burien Community. Many of the community members just recently heard of the changes and would like an opportunity to provide feedback for the Lake Burien area. I realize this has been a two year process, but looking at the website, it just refers to Ambaum and the Boulevard Park neighborhoods. The website is a little cumbersome for me, so I may have missed something.	The City developed a project website called the Shape your City where there is a channel for the Comprehensive Plan.¹⁴ There are proposed Land Use Designation Map changes reflected in the Comprehensive Plan along the north side of Lake Burien to RL 2. There are no proposed zoning changes in single family areas currently. Middle housing zoning is expected to be completed in mid-2025. Burien Municipal Code (BMC) 19.65 does not require site specific notice for areawide designation changes. See also responses to comments August 19, 2024, Dr. C. Edgar.

¹² See: https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_11045935/Image/maps/CAO_Address_062415_36x41.pdf.

¹³ See: https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_11045935/File/Residents/Public%20Works/Master%20and%20Facility%20Plans_Restored/Burien-SWDMP-2020-10-19.pdf.

¹⁴ See: <https://connect.burienwa.gov/projects/comprehensive-plan-update/>.

Appendices

Date	Name/Agency	Comment Summary	Response
September 4, 2024	Dr. C. Edgar	These areas of the Lake Burien Neighborhood (now shown as Residential Low 2 on the draft Land Use map)need to be changed on the 2044 preferred Land Use map as Residential Low 1 and likewise on the Zoning designation to RL-1. Request to use best available science. Request to update the notification lists.	See also responses to comments August 19, 2024, Dr. C. Edgar above.
September 12, 2024, including September 8, 2024	Dr. C. Edgar and Dr. R. Edgar	Notification: SEPA Distribution list was created by BERK per commenter. We want to be made aware of when Public Comments can be put on the public record for this 2044 Comp Plan, 2044 Comp Plan Land Use Map, 2044 Zoning Map, tables and exhibits and the 2044 draft FEIS. The Seattle Times serves the City of Seattle but is generally insignificant to Burien readers. The Highline Times no longer exists. The City of Burien needs to get a new notice posting source. Suggestion is that time sensitive, public notices immediately pop up on the front page of the city home page. Blog source pages notice are not always reliable information sources. Shoreline Designations, Draft Plan, and Draft EIS: Errors regarding SMP and Lake Burien: It remains unclear how we were missed as a Shoreline of the State and as protected by the Burien SMP. These 2044 draft documents claim that there will be no changes to the Burien Shorelines and yet out neighborhood clearly shows land use, maps, zoning, and density changes occurring to it but not to the Marine Shorelines. Mixed Use Node at SW 21st and 152nd: Between SW 152nd and SW 20th and SW 21st there is a hot pink rectangle that designates those properties as Commercial Mixed Use. They have never been Commercial Mixed Use in use. In real life, this property is the St. Frances	Notification: The City published notices in the Seattle Times and posted a Blog Post to the Shape Your City website. It was also advertised in the B-Town blog.¹⁵ The SEPA Distribution list is maintained by the City of Burien as a lead agency. The City can update it in the future. The Highline Times is removed in this Final EIS distribution list. The commenters have participated consistently from July to October 2024 in the City Council review and hearing. The Final EIS distribution list includes all persons who commented on the Draft EIS and voluntarily those who participated in the Planning Commission and City Council hearings. This Final EIS appendix includes the post-Draft EIS comments and responses. The City is providing a notice of availability of the Final EIS to the commenters. Shoreline Designations, Draft Plan, and Draft EIS: The Draft EIS includes figure 3.3-7, which includes shoreline designations illustrating marine shorelines and Lake Burien (page 3-67). The shoreline designations are included in the Draft Comprehensive Plan on Exhibit 8-1 Critical Areas, and the Council hearing draft includes a more specific SMP description and map in response to the comments around Exhibit 8-2. The SMP is considered an element of a comprehensive plan and regulations are part of the City's development regulations, as described in the element. The element incorporates by reference SMP goals and policies in BMC Chapter 20. The Draft EIS indicates on page 3-69 that there are no changes to shoreline

¹⁵ See: <https://b-townblog.com/city-of-burien-seeking-public-review-comment-on-its-2044-comprehensive-plan-update-eis/>.

Date	Name/Agency	Comment Summary	Response
		Elementary School, Gymnasium, Playfield, Parking Lot, related offices, pastor's residence and Church. Future Land Use and Zoning: Correct the draft Land Use Map for the Lake Burien Neighborhood and that all of the land to the southside of SW 152nd, along the east(11th)side and west(20th) sides of the neighborhood be changed on the draft Land Use Map and draft Zoning Map and tables to be consistent with the south side of the Lake Burien Neighborhood to show the neighborhood as RL-1 Land Use and R-1 zoning.	environment designations – which are specified in the SMP. That is still accurate. No SMP amendments are proposed that change the shoreline designations, policies, or regulations. Any development will need to meet SMP regulations, critical area regulations and zoning regulations. The most restrictive regulations apply. Mixed Use Node at SW 21st and 152nd: The concept of having mixed use nodes was studied in Alternative 2 and carried forward in the Preferred Alternative. It is a 20-year plan and alternative development patterns may occur over time. Changes would be at the property owner's initiative. Future Land Use and Zoning around Lake Burien: Draft EIS alternatives considered designations like Residential Low 1 or 2 to fit middle housing concepts, and proximity to transit consistent with HB 1110. The Preferred Alternative is a blend of these Draft EIS alternatives. Zoning to implement RL 1 or 2 is pending in mid-2025. The City's critical areas and shorelines regulations will apply regardless.
September 11, 2023	Dr. C. Edgar and Dr. R. Edgar	1: What kind of notification was provided regarding the proposed zoning changes? Why were homeowners who will be directly impacted by the zoning changes not notified to be able to provide comment/feedback? Lake Burien has been an established neighborhood for many years. Are we a "Party of Record"? And if not, why not? 2: Was the Shoreline Master Plan (SMP) reviewed prior to the zoning proposals? A. Properties surrounding Lake Burien are designated as Shoreline Residential. Per the SMP, commercial building and office buildings are prohibited in these areas; however, zoning proposals have marked certain properties as Commercial Mixed Use. This is a violation of the SMP. How will this be addressed? Can you change the zoning, but deny building because of the SMP? B. Properties surrounding Lake Burien are designated in the critical	1: There are no proposed zoning changes to the Lake Burien neighborhood currently. There are proposed Land Use Designation Map changes reflected in the Comprehensive Plan along the north side of Lake Burien to Residential Low 2. Burien Municipal Code (BMC) 19.65 outlines the procedural requirements for a Type 4 review process of which the area-wide Comp Plan amendment, non-project zoning changes and development regulation amendments are subject to. Pursuant to BMC 19.65.080.4.B <i>Distribution. At least 14 days prior to the date of the public hearing, the Director shall provide for notice of the public hearing to be published in the City's official newspaper. <u>If the proposal involves specific property, rather than an area-wide or zone-wide change, the notice shall also be mailed via first class mail to property owners of record within 500 feet of the specific property, and shall also be posted on one or more notice boards on or near the specific</u></i>

Date	Name/Agency	Comment Summary	Response
		areas map as Wetland Buffers and Aquifer zones. There are very strict build requirements because of this, including requiring specific ecological studies. How would the construction of multi-unit residences be addressed? Was this taken into consideration with the latest zoning proposal? Does the SMP precede revised zoning changes? Why change zoning/land use around Lake Burien if the SMP, CAO and possibly the EIS would prevent the goal of increased density? 3: While the Environmental Impact Study (EIS) was completed earlier this year, the current zoning proposals were not specifically examined. How will this be addressed? Will another study be completed? A. This EIS does not go to the level of depth required when building in a critical area. How will this be addressed? 4. What is the rationale for increasing the zoning density along the south side (lake-side) of 152nd, but not deeper on the North side of 152nd, where residences are not designated as critical areas? Why was zoning density decreased in Gregory Heights and Seahurst (non - critical areas) but increased in the Lake Burien Critical areas? 5. Storm water drainage flows from 152nd and surrounding properties into Lake Burien. This impacts the ecology of the lake. This was not addressed in the EIS. Will this be considered, as greater density will have a direct impact on drainage flow into the lake, negatively affecting the delicate ecosystem of the lake. 6. What prompted the changes to the zoning and land use map from January 2024 to July 2024 at such a late date in the process, and after the public comment deadline and the EIS was conducted? 7. Is the current sewage and water capacity robust enough to handle increased density and fire flow requirements?	<u>property</u>. The Director shall establish standards for size, color, layout, design, wording and placement of the signs and notice boards. 2A: It is important to think about the Comprehensive Plan Designations, Zoning, Shoreline Designations, and Critical Areas as layers of regulations. The Shoreline Designation is not a zone and does not follow parcel boundaries like zoning does. Shorelines are defined as <i>those lands extending landward for 200 feet in all directions as measured on a horizontal plane from the ordinary high water mark, floodways and 100-year floodplains, and all wetlands and river deltas associated with the streams, lakes, and tidal waters which are subject to the State of Washington Shoreline Management Act. Per BMC 20.40.120.</i> The Shoreline Designation is not a zone and does not follow parcel boundaries as such the provisions limiting the allowed uses in the Shoreline Environment Designations areas do not apply to an entire parcel, instead the uses are limited to the <i>Shorelines</i>, which are, as mentioned above, <i>the lands extending landward for 200 feet in all directions as measured on a horizontal plane from the ordinary high water mark</i>. Therefore, it is possible for a zone to allow certain uses, are the shoreline to allow a subset of uses. 2B: Critical Areas Ordinance is another layer of regulations. Development proposals on lands with critical areas are subject to the provisions of the BMC 19.40. The environmental impacts from specific proposals are addressed on a project by project basis. As mentioned above, the SMP and CAO are layers and do not follow zoning boundaries. Not all properties along SW 152nd street are completely incumbered by the limitations in the SMP and CAO regulations. The Draft EIS describes critical areas associated with Lake Burien such as wetlands. For example, see page 3-13 regarding wetlands, critical areas in proximity to Urban Center on page 3-14 and 3-27, water bodies/riparian areas on page 3-22, bird species at the lake on page 3-24, fish and wildlife and

Date	Name/Agency	Comment Summary	Response
			population growth considerations under all alternatives page 3-27, as well as reference under each alternative on pages 3-28 and 3-29. Lake Burien is a shoreline as described on pages 3-66 and 3-67. 3A: The Residential Low 2 proposed around parts of Lake Burien is not zoning. It is the Land Use Designation to the Comprehensive Plan Land Use Designation Map. No zoning is proposed to be adopted at this time or this year to implement the Residential Low 2 designation. However, in response to HB 1110 the city is required to comply with state legislation that expands housing types known as Middle Housing in RS zones within 6-months of the Comprehensive Plan Periodic Update adoption. The Draft EIS Alternatives evaluate middle housing types in the Residential Low designations; when zoning is developed to implement HB 1110, the City will consider environmental review associated with the code amendments to comply with HB 1110. It is not the intent of the EIS to consider project specific environmental impacts to critical areas. These concerns are always addressed during the review for the specific development application. The EIS is a non-project document per section 2.4.1 of the Draft EIS and WAC 197-11-442. 4: The Planning Commission's recommendations are similar to Alternative 2 which showed greater application of Residential Low 2 around Lake Burien and other mixed use nodes west of Lake Burien. As noted under 2.B, critical areas regulations apply as do shoreline regulations regardless of the Future Land Use designation or zoning. West of 22nd Avenue SW the topography, street pattern, stream courses, and landslide hazard areas begin and the designation is shown as Residential Low 1, which would still allow middle housing and accessory dwelling units but with a smaller range of unit types. Gregory Heights is not currently served by transit and is not within walking distance of mixed-use, amenity rich

Date	Name/Agency	Comment Summary	Response
			areas, whereas the 631 bus serves the Lake Burien neighborhood. The Lake Burien neighborhood is also within walking distance to Old Burien, Downtown Burien, a regional transit station. Proximity to transit was a factor in the Planning Commission recommendations as well as HB 1110 identifying greater units per lot in proximity to transit. 5: The general conclusions reached in the EIS on stormwater are applicable to Lake Burien as well: Although pollutant loads would increase under all alternatives, all new development and redevelopment must comply with current stormwater regulations to be approved. Stormwater codes require that new development and redevelopment address stormwater runoff from the project area and associated roadway improvements. By following the stormwater codes, stormwater impacts would be mitigated. No significant unavoidable adverse impacts to stormwater are anticipated. Additionally, in areas where there is currently no stormwater management (which is the case for much of the area surrounding Lake Burien), development and the required stormwater management activities could improve stormwater quality. Thus, a receiving body of water would be improved over the existing condition. 6: The Draft EIS noted in Section 2.3.5 that the City would develop a preferred alternative that could mix or match features of the Draft EIS alternatives, and it would be studied in the Final EIS. The Planning Commission's Preferred Alternative mixes the elements of neighborhood nodes and variations of Residential Low in Alternative 2 as well as a Greater Downtown in Alternative 3. The Planning Commission's Preferred Alternative was developed based on a review of Draft EIS alternatives, Draft EIS comments, as well as public meetings and a hearing where public comment was made. The City Council is likewise conducting a hearing. 7: The City coordinated with utility and fire district service providers. Draft EIS Section 3.11 shows areas of potential water or sewer system deficiencies and

Date	Name/Agency	Comment Summary	Response
September 13-16, 2024	Dr. C. Edgar and Dr. R. Edgar	Corrections (by pg. no.) in the draft Comp Plan that need correction for the Lake Burien Neighborhood where the Lake Burien Neighborhood is not correctly identified as a Burien Shoreline or a Shoreline of the State. Page 8-3 discusses Shoreline Habitat and again mentions shorelines along Puget Sound-again no mention of shorelines along Lake Burien. On pg.8-5, Exhibit 8-1 Critical Areas Map, could not clearly see shorelines designated around Lake Burien. In going over the DEIS from Jan.2024, I saw the shoreline habitat discussed and saw the Puget Sound shorelines discussed. Lake Burien shoreline was not discussed. In the DEIS, it is mentioned that there will be no changes to the Burien shorelines, but you have not mentioned the Lake Burien Shoreline in this document. At 1.6.1.2, pg. 1-18, line 2-will need to read-"High growth potential is not indicated for the marine shorelines and not for the Lake Burien freshwater shorelines". At 1.6.1.3,pg. 1-22-The statement" Both Alternatives 2 and 3 state"... development intensity avoids the shorelines". That means that the Lake Burien Neighborhood Shorelines will also be low intensity in development too. Chapter 2, Exhibit2.3.11, pg. 2-20-the Lake Burien Neighborhood should be changed to Residential Low 1 and Zoning R-1. Colors in the key to reflect that change.	capital improvements. Existing codes and other mitigation measures are noted there, and in the Draft Comprehensive Plan. The City requires adequate facilities prior to development in BMC Chapter 19.70 including adequate sewage disposal and fire flow. Corrections: Please see responses to the September 8/12, 2024 email above regarding Shoreline Designations, Draft Plan, and Draft EIS. The Council hearing draft includes a more specific SMP description and map in response to the comments around Exhibit 8-2. The Draft EIS indicates on page 3-69 that there are no changes to shoreline environment designations – which are specified in the SMP. That is still accurate. No SMP amendments are proposed that change the shoreline designations, policies, or regulations. The Preferred Alternative reflects the Planning Commission recommendations and includes RL 2 along the north and east sides of the lake within proximity to transit. The City developed some zoning concepts about middle housing using a grant in 2023.¹⁶ See paper at footnote below. Zoning to implement RL designations is pending in mid-2025. The City will develop proposed code and hold public meetings and hearings as appropriate. The City's critical areas and shorelines regulations will apply regardless. Clarification of the habitat associated with Lake Burien is included in Chapters 1 and 4 of this Final EIS. ► Change is proposed at 1.6.1.2 – RL 1 or 2 designations in the action alternatives including the Preferred Alternative do not constitute high growth potential. ► Chapter 3, Natural Environment, pg. 3-2, Add and identify"... Lake Burien as a freshwater shoreline in Burien". Stormwater: The City's Public Works Department has adopted a 2020 Stormwater Management Plan and has added a number of assets since 2020

¹⁶ See: <https://connect.burienwa.gov/wp-content/uploads/2023/08/June-2023-Middle-Housing-Staff-Report.pdf> and <https://connect.burienwa.gov/wp-content/uploads/2023/08/June-2023-Middle-Housing-Staff-Report-Attachments.pdf>.

Appendices

Date	Name/Agency	Comment Summary	Response
		Chapter 3, Natural Environment, pg. 3-2, Add and identify"... Lake Burien as a freshwater shoreline in Burien". Additionally in 2013 during the development of the Burien SMP, the Lake Burien Neighborhood had 11 stormwater outlets into the lake- Burien SMP, Data Analysis Report, March, 2010, Pg.1. However under current draft Stormwater, pg.1-47, 1-48 , the Stormwater Map now only shows 7 stormwater outlets into the lake. Having met with Dan O'Brien, he was unable to identify what has happened to the other 4 outlets since that time.	maintained in an online map.¹⁷ See Section 4.3.10 for clarifications and corrections.
September 23, 2024	Dr. C. Edgar and Dr. R. Edgar	It appears now that the 2044 draft Burien Zoning map has been corrected for the NAVOS property returning it back to a Special Planning Area 2. However, it remains unclear what you are doing with the Lake Burien Neighborhood on Land Use Map for the Lake Burien Neighborhood properties along SW 20th and SW 21st, along SW 11th and on the southside of SW 152nd. The fix is quite simple for the draft Land Use Map; just change the orange color around Lake Burien-on all sides- to light yellow. Corrections to the 2044 draft Burien Comp Plan text- All of those areas where the Shorelines are discussed currently only mention the Puget Sound Marine Shorelines. Corrections to the 2044 draft Burien Comp Plan EIS- All of those areas where the Shorelines are discussed currently only mention the Puget Sound Marine Shorelines.	Navos site/SPA-2: As part of map corrections for medical related sites, the Preferred Alternative developed for the City Council proposes a Future Land Use Map designation of Commercial/Mixed Use but proposed zoning retains SPA-2 for zoning purposes. See the September 7, 2024 City Council packet. Future Land Use and Zoning around Lake Burien: Draft EIS alternatives considered designations like Residential Low 1 or 2 to fit middle housing concepts, and proximity to transit consistent with HB 1110. The Preferred Alternative is a blend of these Draft EIS alternatives. Zoning to implement RL 1 or 2 is pending in mid-2025. The City's critical areas and shorelines regulations will apply regardless. Corrections to Comprehensive Plan Text regarding Lake Burien as Shoreline: The shoreline designations are included in the Draft Comprehensive Plan on Exhibit 8-1 Critical Areas, and the Council hearing draft includes a more specific SMP description and map in response to the comments around Exhibit 8-2. The SMP is considered an element of a comprehensive plan and regulations are part of the City's development regulations, as described in the element. The element incorporates by reference SMP goals and policies in BMC Chapter 20. Corrections to Draft EIS regarding Lake Burien as Shoreline: Clarification of the

¹⁷ See: <https://ogtx.burienwa.gov/ExternalViewer/index.html?viewer=Stormwater>.

Date	Name/Agency	Comment Summary	Response
			habitat associated with Lake Burien is included in Chapters 1 and 4 of this Final EIS. ► Change is proposed at 1.6.1.2 – RL 1 or 2 designations in the action alternatives including the Preferred Alternative do not constitute high growth potential. ► Chapter 3, Natural Environment, pg. 3-2, Add and identify "... Lake Burien as a freshwater shoreline in Burien".
September 30, 2023	Dr. C. Edgar and Dr. R. Edgar	Critical Areas, Shorelines, Environmental Sensitivity: We have written to you on several occasions about corrections needed the documents named in the topic line of this letter. Some of these are simple errors of omission, simple errors for correction and errors that occurred for lack of accurate knowledge about the Lake Burien Neighborhood- its designation as a Shoreline of the State, the SMP, the lack of understanding the concept of "no net loss" and the processes for "best available"(BAS) science. The GMA also requires the standard of "no net loss" and the use of "best available science" to test for it. In each of these Master Plans, the "land always speaks first." Other Comments on Plan: "The land speaks first" is a principle that also applies to resident and nonresident political activist group who sought to "skew the data, survey results and public engagement events and the real directives of the GMA and the SMP starting back as far as 2022. Such an online group has come to our attention that allegedly claim to have worked to subvert the developmental stages of this Comp Plan process for their own purposes. Land Use and Zoning around Lake Burien: It appears that the 2044 draft Land Use Map is in error for the Lake Burien Neighborhood and creates an inconsistency between its other related documents that state that there will be no changes in the shorelines. Final EIS and Responding to Comments: As the time draws very	Critical Areas, Shorelines, Environmental Sensitivity: The Draft Plan and Draft EIS consider critical areas and regulations. The Draft EIS considers the wetlands, riparian, and open space area around the lake. Clarification of the habitat associated with Lake Burien is included in Chapters 1 and 4 of this Final EIS. As described under September 11 and 23 letters above. The Council hearing draft includes a more specific SMP description and map in response to the comments around Exhibit 8-2. Other Comments on Plan: The City conducted many events and comment opportunities from 2022-2024 as well as engaging an Advisory Committee, and Planning Commission. The commenters were engaged on land use, transportation, housing, parks, and many others. There is no indication based on staff and consultant review of results that any one commenter or group has skewed results. There is a diversity of opinions on needs and visions for Burien. Land Use and Zoning around Lake Burien: The history of zoning around Lake Burien including the downzoning in Ordinance 614 is included as part of a history of zoning in Comprehensive Plan Appendix B, <i>Burien Housing Policy Evaluation: Racially Disparate Impacts, Displacement, and Exclusion in Housing</i>, page 2-8. The City developed some zoning concepts about middle housing using a

Date	Name/Agency	Comment Summary	Response
		near to a final vote by the Council and the issuance of the 2044 Burien FEIS, we would like to review this WAC for the Council. That is where the agency is required to provide this information, as specified in the WAC 197-11-560.	grant in 2023.¹⁸ See paper at footnote below. Zoning to implement RL designations is pending in mid-2025. The City will develop proposed code and hold public meetings and hearings as appropriate. The City's critical areas and shorelines regulations will apply regardless. The Preferred Alternative reflects the Planning Commission recommendations and includes RL 2 along the north and east sides of the lake within proximity to transit. Final EIS and Responding to Comments: While Draft EIS comments were not received during the Comment Period, the City is voluntarily including the comments and responses in this Final EIS appendix. The City is providing a notice of availability to all who participated in the Planning Commission hearing and the following City Council review and hearing process from June 26 to October 7, 2024.
October 3, 2024	David Bricklin	The Comp Plan DEIS states that the proposed actions being assessed includes amendments to the zoning code (and other development regulations). I have been unable to find those proposed zoning code (and other development regulation) amendments. Do they exist? If so, please send them to me or let me know where I can locate them on your website.	The City developed mixed use and multifamily zoning for the Ambaum Boulevard Park subareas in 2023 ¹⁹ and a citywide middle housing staff report ²⁰ to fulfill a 2023 Commerce grant. The work is being wrapped into the Comprehensive Plan Update and implementing regulations to meet HB 1220. However, the City is phasing development regulations after first developing a Preferred Land Use Plan. Implementing zoning is starting with mixed use and multifamily zoning citywide ²¹ in the Ambaum Boulevard Park, 1 st Avenue S, and Urban Center among other nodes to address a gap in affordability compared to the current Comprehensive Plan. The state has given the central Puget Sound communities until the middle of 2025 to fully address middle housing zoning.

¹⁸ See: <https://connect.burienwa.gov/wp-content/uploads/2023/08/June-2023-Middle-Housing-Staff-Report.pdf> and <https://connect.burienwa.gov/wp-content/uploads/2023/08/June-2023-Middle-Housing-Staff-Report-Attachments.pdf>.

¹⁹ See ABP draft zoning in May 2023 <https://burienwa.civicweb.net/filepro/documents/84593/?preview=84594> and draft design standards June 2023 <https://burienwa.civicweb.net/filepro/documents/85274/?preview=85275>. These are proposed for review along with Urban Center zoning in November 2024.

²⁰ See staff report 2023 <https://connect.burienwa.gov/wp-content/uploads/2023/08/June-2023-Middle-Housing-Staff-Report.pdf> and attachments <https://connect.burienwa.gov/wp-content/uploads/2023/08/June-2023-Middle-Housing-Staff-Report-Attachments.pdf>.

²¹ The Planning Commission reviewed zoning map and standards at the June 26, 2024 hearing: <https://burienwa.civicweb.net/filepro/documents/197760/?preview=197761>.

Appendices

Date	Name/Agency	Comment Summary	Response
October 5, 2024	Jon M Newton	Where is the Salmon Creek Neighborhood plan we developed and implemented in the previous Comp Plan? I have reached out to the city to review this existing plan for the Comprehensive plan but didn't get a response. Who is the point of contact with the city?	The current Comprehensive Plan incorporates Salmon Creek Subarea Plan by reference, and the Draft Comprehensive Plan likewise incorporates it by reference in the Vision & Plan Introduction page 1-13 (need to fix the page number to be 0-13).
October 6, 2024	Diane Wilson, Lake Burien Shore Club Board of Directors	There is an apparent contradiction / disconnect between the proposed designation of residential parcels bordering Lake Burien on the West, North and East as Residential Low-2 and the present zoning of those parcels. The proposed RL-2 CP designation would be a significant increase in density in areas that have been acknowledged to be environmentally sensitive. It is difficult to see how the density objectives of the RL-2 designation can be achieved while maintaining current environmental protections for parcels classified as shoreline and wetlands buffers and aquifer recharge. The City plans to propose new residential zoning regulations in 2025. Does the City contemplate amending the critical area and shoreline master program regulations to accommodate the RL-2 designation in these environmentally sensitive areas? We request that the Burien City Council amend the 2044 Comprehensive Plan Update to designate all residential parcels bordering Lake Burien as RL-1.	Draft EIS alternatives considered designations like Residential Low 1 or 2 to fit middle housing concepts, and proximity to transit consistent with HB 1110. The Preferred Alternative is a blend of these Draft EIS alternatives. Zoning to implement RL 1 or 2 is pending in mid-2025. The City's critical areas and shorelines regulations will apply regardless. The City is proposing to review its critical areas regulations in 2025. The SMP was evaluated and updated in 2019 as part of a periodic review. ²² The SMP periodic update is next due in 2029. ²³

²² See: https://www.burienwa.gov/city_hall/laws_regulations/shoreline_master_program.

²³ See: RCW 90.58.080.

Date	Name/Agency	Comment Summary	Response
October 7, 2024	Dr, C, Edgar and Dr. R. Edgar	1. Plan Amendment, pg. 30 of 1002- states that the Comp Plan (CP) is a document that is in meant to be periodically updated and reviewed and revised. Yet when we have approached the Planning Dept. to correct the language in the CP text to state that the Lake Burien Shoreline is a shoreline and a shoreline habitat in the city along with the Puget Sound Marine Shorelines, they have refused to make the changes.	The commenter is not referring to the place where the SMP is discussed, which is in Chapter 8, Sustainability & Natural Environment. See pages 171 and 172 of the City Council hearing packet – text and a map of the SMP were added to respond to prior comments. Also, on pages 178-179 of 1002, it is clarified that the SMP is incorporated by reference into the plan. The hearing draft was the first opportunity to formalize changes and present them to the City Council since the Planning Commission recommendations.
		As we currently understand the process, the FEIS has not been issued yet. We are requesting that the LBSC and we as individual residents (Dr. C. Edgar and Dr. R. Edgar) receive notice of the FEIS distribution list.. As to corrections of the 2044 Draft EIS; ► At 1.6.1.2, pg. 1-18, line 2- will need to read- “High growth potential is not indicated for the marine shorelines and not for the Lake Burien freshwater shorelines”. This change refers to discussions about both Alternatives 2 and 3 maps. ► At 1.6.1.3, pg. 1-22- The statement “Both Alternatives 2 and 3 state”... development intensity avoids the shorelines”. That means that the Lake Burien Neighborhood Shorelines should also be low intensity in development too. The Land Use Map and Land Use Intensity Map around the node should reflect low land use intensity development. ► Chapter 2, Exhibit 2.3.11, pg. 2-20- the Lake Burien Neighborhood should be changed to Residential Low 1 and Zoning R-1. Colors in the key to reflect that change. ► Chapter 3, Natural Environment, pg. 3-2, Add and identify “... Lake Burien as a freshwater shoreline in Burien”.	The notice of the Final EIS is being provided to all who commented on the Draft EIS as well as voluntarily to commenters during the Planning Commission hearing and the City Council hearing. References to Lake Burien or freshwater shorelines are included in Sections 1.6.1.2 and 1.6.1.3 of the Final EIS. RL2 is a Residential Low designation and is not a high intensity designation. As well, both single family and multifamily development are allowed in Shoreline Residential use environments including along Lake Burien. The City Council has not directed that the Planning Commission recommendation for RL2 be changed in response to the commenter at the time of this writing. The Planning Commission recommendation is similar to Alternative 2. Regarding the requested change to Chapter 3 of the Draft EIS, see Section 4.3.1 of Clarifications and Corrections.

Date	Name/Agency	Comment Summary	Response
		2. Section 1- Equity, Policy1.14, pg.34 or 1002 states when developing Burien’s strategic plans, policies and programs, meaningfully engage with the communities who will be most impacted by the plan, policy or program. We would like to call the city’s attention to the Planning Advisory Committee which had no representatives from the Lake Burien Neighborhood on it. No one in the Lake Burien Community Club and no neighborhood residents were contacted to serve on the Committee. We belong to one of the noted underrepresented groups in this policy and yet no one attempted inclusive outreach to us to serve on the Committee. This was a Committee that according to the Planning Dept. made the decision to change the Land Use Map, the Intensity Land Use Map showing nodes and zoning for the Lake Burien Neighborhood/Shoreline. The city needs to correct its previous errors to the Lake Burien Neighborhood Land Use Map and follow its own policies for the further work on zoning.	The membership of the Advisory Committee is shared at the Shape Your City website:²⁴ ▶ A representative from several City Council-appointed advisory boards (Arts Commission, Burien Airport Committee, Business and Economic Development Partnership, Human Services Commission, etc.) ▶ Five Burien Community Connectors, representing Burien’s Amharic, Spanish, and Vietnamese-speaking communities. ▶ Burien Planning Commission was a member of the advisory committee. In sum, the representatives were on already-appointed commissions or part of the Community Connector program. The commenter has attended Advisory Committee meetings, and has provided extensive comments to the City Council.
		3. Section 2, Land Use. The maps in this section of the document are very difficult to read. They appear to have been made by Makers/consultants. They lack clarity, street names, color accuracy and readability. This is in violation of the GMA where the documents are supposed to be easily readable and understandable to the average citizen. We request the maps be improved to the standard of the maps shown in the current Burien Maps Library for previous Comp Plans.	GMA does not identify the format of maps for a City. However, in addition to the smaller map in the Land Use Element, 11 x 17 maps with parcels are part of the Final EIS Appendix A. In addition, interactive map tools are available online to zoom in. See footnote.²⁵

²⁴ See: <https://connect.burienwa.gov/burien-2044-advisory-committee-to-guide-comprehensive-plan-update/>.

²⁵ Land Use Alternatives Planning Map: <https://berk.maps.arcgis.com/apps/instant/basic/index.html?appid=10e1b79b4f2d4a64b4126f01c8922b34>.

Date	Name/Agency	Comment Summary	Response
		4. pg. 57 of 1002. Policy 2.5-1. States that the city will encourage and support the development of subarea or neighborhood plans and supply administrative support and personnel to support neighborhoods, etc. Once adopted, the plan will be periodically reviewed. The city had this previously in the CP and then abandoned it-Neighborhood Plans-because it claimed it didn't have the staff and resources to support such a plan. Does this mean that the draft CP is again reinstituting Neighborhood Plans?	Policy 2.5-1 is similar to an existing policy NQ 1.2. The City has sought funding of subarea plans such as the Urban Center and Ambaum Boulevard Park. The City Council will ultimately determine what subarea plans it wishes to fund.
		5. Policy 2.10.1, pg. 62 Of 1002-...Discourage development and land use decisions that adversely impact the natural environment. Based on that policy we are requesting a correction to the 2044 draft Land Use Map for the Lake Burien Neighborhood to RL-1.	As described under responses to point 1 in the letter, RL2 is a Residential Low designation and is not a high intensity designation. The City Council has not directed that the Planning Commission recommendation for RL2 be changed in response to the commenter at the time of this writing. The Planning Commission recommendation is similar to Alternative 2. As well, both single family and multifamily development are allowed in Shoreline Residential use environments including along Lake Burien. The SMP contains standards meant to achieve no net loss of shoreline ecological function. Critical areas regulations will also continue to apply.
		6. pg. 168 of 1002, Shoreline Habitats – be corrected to identify the Lake Burien Neighborhood/Shoreline as a freshwater shoreline habitat.	The bullet at the top of page 168 can be amended to say "<u>Marine</u> Shoreline Habitats" since Lake Burien is addressed under "Water Bodies and Riparian Corridors" in bullet 4.

Appendices

Date	Name/Agency	Comment Summary	Response
		7. Lastly, we have requested that the Stormwater Outlet Map for the Lake Burien Neighborhood be corrected to show the 11 outlets. We have provided the historical and correct map to the Public Works Depart. so they a corrected version of the map. This is an important tool to have as the Neighborhood and some homes flood during heavy rain and storm events. And it can be used for emergency cleaning and clearing purposes. Please return these official maps back to us.	The Public Works Department has continued to update its stormwater inventory and maps after the 2020 Stormwater Plan was adopted. A footnote to the most current online map is provided below.²⁶
October 7, 2024	Frank and Gretchen Erickson	As residents of the Lake Burien Neighborhood our testimony for the Public Hearing on Ordinance 847, the 2044 draft Burien Comp Plan that the 2044 draft Burien Land Use Map should consistency show the entire Lake Burien Neighborhood/Shoreline as Residential Low R-1 Land Use (RL-1)-excluding the Navos property. The Lake Burien Neighborhood is a protected Shoreline of the State. The most restricted rule governing its protection prevails. The Land Use Map should reflect that. The Lake Burien Neighborhood is best described by the designation Residential Low-1 RL-1 and the zoning for the area is best described by R-1. We are requesting that the Council make that change to the 2044 draft Burien Land Use Map for the Lake Burien Neighborhood. We have lived on Lake Burien since 1981 and appreciate you correcting this to protect the lake ecosystem and our investment.	RL2 is a Residential Low designation and is not a high intensity designation. The City Council has not directed that the Planning Commission recommendation for RL2 be changed in response to the commenter at the time of this writing. The Planning Commission recommendation is similar to Alternative 2. As well, both single family and multifamily development are allowed in Shoreline Residential use environments including along Lake Burien. The SMP contains standards meant to achieve no net loss of shoreline ecological function. Critical areas regulations will also continue to apply.

²⁶ The City has adopted a 2020 Stormwater Management Plan. The City has added significant stormwater assets since 2020 and maintains an online map tool that is updated as needed (pers com Dan O'Brien, October 14, 2024): <https://ogtx.burienwa.gov/ExternalViewer/index.html?viewer=Stormwater>.

Affordable Housing Committee

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PLANNING COUNCIL

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*Washington Multi-Family
Housing Association*

Sunaree Marshall
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Robin Walls
*King County Housing
Authority*

Maiko Winkler-Chin
*On behalf of Seattle
Mayor Bruce Harrell*

June 11, 2024

Ms. Liz Stead
Community Development Director
City of Burien
400 SW 152nd St, Suite 300,
Burien, WA 98166

Dear Ms. Stead,

Thank you for submitting the City of Burien's draft comprehensive plan to the Affordable Housing Committee (AHC) for review on March 7, 2024. On behalf of the AHC, I am sending you this summary of our review and recommendations.

Background

The AHC is a subcommittee of the Growth Management Planning Council (GMPC), consisting of representatives of King County and its cities, housing providers, area employers, and others. By direction of the GMPC, the AHC now conducts a housing-focused review of all King County jurisdictions' draft periodic comprehensive plan updates, assessing the draft plans for alignment with the [King County Countywide Planning Policies](#) (CPP) Housing Chapter goals and policies prior to plan adoption.

As you know, our county is experiencing a deep and persistent housing shortage. In 2021 the State of Washington adopted [House Bill 1220](#), which amended the Growth Management Act, requiring local governments to plan for and accommodate housing that is affordable to all income levels, including emergency housing. In response to this state mandate and local interest in improving the effectiveness of local housing plans and policies, the AHC led a two-year process to amend the King County CPPs.

The result was a significant update to the CPP Housing Chapter, which was recommended by the GMPC, adopted by the King County Council, and ratified by the cities in 2023. The goals of both the statute and this implementation work are to encourage cities and King County to work together to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.

This review is guided by Housing-Focused Comprehensive Plan Review Standards, as adopted by [GMPC Motion 23-2](#). In summary, the AHC review seeks to determine whether each jurisdiction's draft plan and submission materials:

1. Address all CPP Housing Chapter policies;
2. Articulate implementation strategies for relevant CPP Housing Chapter Policies; and
3. Lay out meaningful policies that, taken together, support the jurisdiction's ability to equitably meet housing needs.

AHC members appreciate Burien being one of the first jurisdictions to submit to the program in 2024. This program is still relatively new and evolving, and your engagement helped the AHC understand how jurisdictions are seeking to address their housing needs while aligning with the recent changes at the state, regional, and county levels.

The AHC acknowledges the substantial amount of time and effort that went into Burien's draft comprehensive plan. Many of Burien's plans policies, analyses, and implementation strategies align well with CPP Housing Chapter policies. In particular,

1. The new Community Health and Well-being Chapter is a creative planning approach that includes housing-related policies that will help ensure new development is focused in areas that promote community health and well-being and mitigate noise, air, and other hazards.
2. Burien's Affordable Housing Demonstration Program is a strong example of a jurisdiction proactively partnering with housing providers to understand how the jurisdiction can provide flexibility in its code to reduce costs and create more affordable housing. This resulted in moving forward three affordable housing projects, totaling 162 units affordable to households with incomes at or below 50 percent AMI. The AHC looks forward to reviewing the lessons learned and the permanent code changes Burien proposed adopting in 2024 as part of the implementation strategies submitted to the AHC.
3. If adopted, the anti-displacement measures identified in Section 3.5.3.3 in Burien's draft environmental impact statement would be a meaningful response to mitigating displacement risk throughout Burien. This is particularly important in the Ambaum Boulevard subarea, where Rapid Ride H, a major investment that can increase the risk of displacement, recently opened.

Below, the AHC includes recommendations necessary to align with the CPP Housing Chapter policies.

Recommendations to Align with the CPP Housing Chapter

Burien needs to take the following actions to align its comprehensive plan with CPP Housing Chapter policies and goals.

1. Prioritize extremely low-income households (CPP H-2)

Relevant Countywide Planning Policies

CPP H-2 requires jurisdictions prioritize the need for housing affordable to households with incomes less than or equal to 30 percent of area median income (AMI).

Burien's Proposal and AHC Findings

Burien's submission to the AHC identifies its existing Rental Housing Inspection Program, Affordable Housing Demonstration Program, code incentives, and Fair Housing Rental Housing Policy as responsive to CPP H-2. While these programs likely serve extremely low-income households (households with incomes at or below 30 percent of AMI), they do not explicitly prioritize this population. Burien's submission also identifies many policies as responsive to CPP H-2 that use the term "low-income," which includes, but is not limited to, extremely low-income households. Additionally, proposed Housing Chapter policy 4.2-2 states Burien will provide opportunities for an economically diversified housing supply, including the needs for extremely low-income households. However, based on the materials Burien submitted, the AHC does not see a clear *prioritization* for the housing needs of 0 to 30 percent AMI households.

Recommendation 1: Burien should amend its Housing Element and the implementation strategies submitted to the AHC to more explicitly demonstrate how its policies and strategies prioritize the housing needs of 0 to 30 percent AMI households to align with CPP H-2. For examples of strategies jurisdictions could use to align with CPP H-2, see the CPP Housing Chapter Technical Appendix.¹

2. Complete the housing inventory and analysis (CPP H-3)

Relevant Countywide Planning Policies

CPP H-3 directs jurisdictions to conduct a housing inventory and analysis to help identify and address the greatest needs as well as summarize the findings in the Housing Element.

Burien's Proposal and AHC Findings

While Burien's submission includes many data points and substantive analysis, the AHC could not find all of the specific information required by H-3(d), (e), (g), and (j). This includes:

- d. percentage and geographic distribution of residential land zoned for moderate- and high-density housing and accessory dwelling units in the jurisdiction;
- e. number of income-restricted units and, where feasible, total number of units, within a half-mile walkshed of high-capacity or frequent transit service where applicable and regional and countywide centers;
- g. current population characteristics by age by race/ethnicity; and
- j. ratio of housing to jobs in the jurisdiction.

This additional analysis should inform additional comprehensive plan policy responses and strategies. For example, analysis responsive to CPP H-3(e) could help inform future efforts to provide income-restricted affordable housing in close proximity to transit where there currently is none, in alignment with CPP H-17.

Recommendation 2: Burien should include all inventory and analysis components as required by CPP H-3 in the comprehensive plan and summarize the findings in the Housing Element. This additional analysis should inform additional comprehensive plan policy responses and strategies.

3. Address gaps in emergency housing (CPPs H-1, H-4, H-9, H-11, and H-12)

Relevant Countywide Planning Policies

CPP H-1 requires all jurisdictions to plan for and accommodate emergency housing and allocates a need of 1,433 beds to Burien. CPP H-4 directs jurisdictions to evaluate the effectiveness of existing housing policies and strategies and identify gaps for meeting housing needs and eliminating racial and other disparities in access to housing and neighborhoods of choice. CPP H-9 requires jurisdictions adopt intentional, targeted actions that repair harms to BIPOC households from identified past and current racially exclusive and discriminatory land use and housing practices. The

¹ See King County Countywide Planning Policies Appendix 4: Housing Technical Appendix, pp.82 [\[link\]](#)

King County Regional Homelessness Authority's findings on racial disparities among people experiencing homelessness highlight the importance of addressing a jurisdiction's emergency housing needs as part of aligning with CPP H-9.² CPP H-11 directs jurisdictions to identify sufficient capacity of land for housing, including but not limited to emergency housing and shelters. Finally, CPP H-12 directs jurisdictions to adopt and implement policies that improve the effectiveness and address gaps to meet the jurisdiction's housing needs.

Burien's Proposal and AHC Findings

The draft Homeless Shelters and Permanent Supportive Housing section of the Housing identifies a gap that Burien does not have designated emergency housing spaces for single men, youth, or couples (pp.4-12). Identifying this gap is consistent with CPP H-4 and a critical step in Burien meaningfully addressing its emergency housing needs. While the submission did include a tiny home implementation strategy for 2024, it is not clear if Burien expects this strategy to meet the full identified need to provide emergency housing spaces for single men, youth, or couples.

Burien's draft Housing Element policy 4.2-2 directs Burien to provide land use and zoning opportunities consistent with its allocated need, and Burien submitted an implementation strategy to allow for emergency housing in all zones allowing residential development and hotels. However, Burien did not provide supporting documentation demonstrating that they:

- have one or more zones that allow hotels, all of which allow for emergency housing by right or allow emergency housing by right in a majority of zones within a one-mile proximity to transit and
- have no regulations that limit the occupancy, spacing or intensity of emergency housing.

According to Washington State Department of Commerce guidance,³ Burien must either demonstrate it meets the conditions above or conduct an emergency housing capacity analysis to show sufficient capacity for its emergency housing needs prior to adoption of its comprehensive plan and include it in their plan. Without sufficient documentation of compliance with state requirements or an emergency housing capacity analysis, the AHC cannot determine if this implementation strategy will provide sufficient capacity as required in CPP H-11.

To ensure Burien is consistent with the CPPs identified in this recommendation, as well as Burien's proposed draft Human Services Element policy 5.1.6 to "make Burien a welcoming and just community marked by fairness and equity provided to those disproportionately affected by poverty, discrimination, and victimization," Burien must plan for and accommodate emergency housing needs for all populations experiencing homelessness. To do so, Burien must state a clear policy of active city involvement and implementation strategy that outlines the city's actions to address the emergency housing gap for single men, youth, and couples. In absence of such a policy and implementation strategy, it does not appear that Burien's plan will meaningfully plan for and accommodate its emergency housing need (CPP H-1).

² King County Regional Homelessness Authority. *Data Overview*. [\[link\]](#)

³ Washington State Department of Commerce. *Guidance for Updating your Housing element (Book 2)*. [\[link\]](#)

Recommendation 3: To meaningfully plan for and accommodate emergency housing needs consistent with CPP H-1, be responsive to the findings in CPP H-4, and align with CPPs H-9, H-11, and H-12, Burien should demonstrate that its proposed land use and zoning changes provide sufficient capacity for emergency housing, consistent with guidance from the Washington State Department of Commerce. Burien should also provide the AHC with complete and meaningful implementation strategies to address its gap of having no emergency housing designated for single men, youth, and couples. Burien can wait until after comprehensive plan adoption to submit the implementation strategies but must conduct and document the land capacity analysis within the adopted comprehensive plan. Although we understand that work is ongoing, based on the publicly available information about the interim ordinance under consideration for transitional housing, that ordinance would not provide sufficient capacity in the city for emergency housing set out in the CPPs.

4. Explicitly plan for and prioritize income-restricted housing (CPPs H-10, H-14, and H-17)

Relevant Countywide Planning Policies

CPPs H-10, H-14, and H-17 address the need for “income-restricted housing.” CPP H-10 requires jurisdictions to adopt policies, incentives, strategies, actions, and regulations that increase the supply of long-term income-restricted housing for extremely low-, very low-, and low-income households and households with special needs. CPP H-14 requires jurisdictions to prioritize resources for income-restricted housing, particularly for extremely low-income households, populations with special needs, and others with disproportionately greater housing needs. CPP H-17 requires jurisdictions to support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.

Burien’s Proposal and AHC Findings

Burien’s draft plan proposes policies and implementation strategies that frequently use the term “affordable housing” and will likely support development of income-restricted affordable housing. Income-restricted housing is guaranteed to provide lower-income people with an affordable place to live through a regulatory restriction. The term “affordable housing” includes income-restricted affordable housing, but also naturally occurring affordable housing, which is not guaranteed to remain affordable. Burien’s Housing Chapter policy 4.1.1 also identifies protecting naturally occurring affordable housing through the use of long-term affordability covenants. However, the CPP Housing Chapter’s requirements related to income-restricted housing are broader than policy 4.1.1 as drafted, and use of the term “affordable housing” does not necessarily align with “income-restricted.”

Recommendation 4: To align with CPPs H-10, H-14, and H-17, Burien should include policies, incentives, strategies, actions, and regulations in its plan and/or implementation strategies that explicitly increase the supply of long-term income-restricted housing. Burien should also include policies that prioritize resources for this housing need and support the development and preservation of income-restricted affordable housing within walking distance to transit. For examples of strategies jurisdictions may use to align with these CPPs, see the CPP Housing Chapter Technical Appendix.

5. Increase housing choice near employment opportunities (CPP H-15)

Relevant Countywide Planning Policies

CPP H-15 requires jurisdictions to increase housing choices for everyone, particularly those earning lower wages within a reasonable commute to employment centers and affordable at all income levels.

Burien's Proposal and AHC Findings

Burien's draft plan proposes policies that increase housing choice in areas throughout the jurisdiction and appear to demonstrate an intent in alignment with CPP H-15. However, the AHC did not identify a policy that explicitly links increasing housing choice affordable to everyone with employment opportunities.

Recommendation 5: To align with CPP H-15, Burien should include a policy in their comprehensive plan that states their intent to increase housing choices affordable to everyone within a reasonable commute to employment centers.

Conclusion and AHC Resources

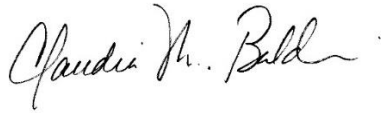
Thank you again for your submission to the Committee's housing-focused comprehensive plan review program. AHC members valued the opportunity to review Burien's January 2024 Draft Burien 2044: Our Comprehensive Plan and related submission materials. Burien's participation in the plan review program is instrumental in the broader work of the Committee to empower local jurisdictions to address the affordable housing crisis in King County.

AHC staff are happy to assist Burien in addressing these recommendations. For immediate resources and guidance on aligning with the CPP Housing Chapter, refer to the

- [Engrossed 2021 King County CPPs](#);
- [AHC Housing-focused Draft Comprehensive Plan Review Program Guide](#); and
- [King County Resources for Documenting the Local History of Racially Exclusive and Discriminatory Land Use and Housing Practices](#).

If you have questions or need additional information regarding aligning with the CPP Housing Chapter, please contact lead staff for the AHC plan review program, Isaac Horwith, at AHCplanreview@kingcounty.gov or at 206-477-7813.

Sincerely,

A handwritten signature in black ink, appearing to read "Claudia M. Balducci".

Claudia Balducci
Affordable Housing Committee, Chair
King County Councilmember, District 6

CC Dow Constantine
 Growth Management Planning Council Chair
 King County Executive

Laura Hodgson
Washington State Department of Commerce, Senior Planner

Plan Review Team
King County Affordable Housing Committee

Plan Review Team
Puget Sound Regional Council



Puget Sound Regional Council

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August 30, 2024

Glenn Akramoff, Interim Public Works Director
City of Burien
400 SW 152nd Street
Burien, WA 98166

Subject: PSRC Comments on City of Burien Draft Comprehensive Plan -
Transportation

Dear Mr. Akramoff,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review drafts of the City of Burien's Transportation Element and Transportation Master Plan. We appreciate that the city has invested a substantial amount of time and effort in developing the draft Transportation Element and Transportation Master Plan and appreciate the chance to review while in draft form. This timely collaboration provides an opportunity to review plan elements for the 2024 comprehensive plan and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

PSRC previously provided comments on other aspects of the draft comprehensive plan in February 2024. We suggest the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act.

We reviewed the draft Transportation Element and draft Transportation Master Plan using the PSRC Plan Review Consistency Tool. Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right:

Transportation

Plan Review Consistency Tool	PSRC Comment on Burien’s Draft Plan
Provide travel demand forecasts and identify state and local system projects, programs, and management necessary to meet current and future demands and to improve safety and human health (RCW 36.70A.070, MPP-T-4-5)	The plan should clarify the growth assumptions used in transportation modeling and demonstrate consistency with the rest of the comprehensive plan and growth targets from the county.
Focus system improvements to connect centers and support existing and planned development as allocated by the Regional Growth Strategy (MPP-RC-7-9, T-7-8, T-15) Prioritize multimodal investments in centers and high-capacity station areas (MPP-RC-7-10, T-12-13, T-19)	The plan should include a policy to prioritize investments in designated regional and countywide centers, consistent with regional policy.
Include mapped inventories for each element of the transportation system, including roadways, transit, cycling, walking, freight, airports, and ferries (RCW 36.70A.070, RCW 36.70A.108, MPP-T-7, T-15-17)	The plan should include a mapped inventory of all transit facilities, including both the transit network and information on service.
Airport-adjacent communities: Describe existing and planned uses near the airport, as well as policies and regulations that discourage incompatible uses (RCW 36.70.547, 36.70A.070(6)(a)(iii)(A), MPP-DP-48)	The plan should include additional information about land uses adjacent to Sea-Tac Airport and policies and regulations to discourage incompatible uses. PSRC’s Airport Compatible Land Use Report provides information about planning adjacent to airports.

PSRC Comments on City of Burien Draft Comprehensive Plan – Transportation

August 2024

Page 3

Plan Review Consistency Tool	PSRC Comment on Burien’s Draft Plan
Additional transportation areas.	Many required components of the transportation element are included in the city’s Transportation Master Plan. This plan should be adopted by reference into the comprehensive plan.

PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses and moves through the adoption process. If you have any questions or need additional information, please contact PSRC at planreview@psrc.org.

Sincerely,



Maggie Moore, Growth Management
Puget Sound Regional Council

cc: Review Team, Growth Management Services, Department of Commerce



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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www.commerce.wa.gov

September 30, 2024

Liz Stead, Community Development Director
City of Burien
400 SW 152nd Street, Suite 300
Burien, WA 98166

RE: Review of Submission #2024-S-7226

Dear Liz:

Thank you for uploading to Commerce the proposed amendments to Burien's comprehensive plan and development regulations in Planview Submission #2024-S-7226, received on July 12, 2024. The submission represents substantial progress in updating your plan and addressing the many revisions to the Growth Management Act that have been adopted over the past several years.

We especially appreciate the Transportation element which addresses complete streets, active transportation and electric vehicle infrastructure; this will set the stage well as Burien continues future climate planning required under [HB 1181](#).

We have two concerns that you should address before you adopt your plan and development regulation amendments:

1. According to Burien Municipal Code (BMC) Chapter 19.35, Transportation Impact Fees are collected. The draft Capital Facilities Plan does not explicitly identify which transportation projects are funded by transportation impact fees collected as required by [RCW 82.02.050\(5\)](#). We recommend identifying which transportation projects will receive funding from impact fees collected.
2. Please update your draft development regulation amendments to allow permanent supportive housing and transitional housing, as well as emergency housing and shelter, in the appropriate zones, per [RCW 35A.21.430](#). Additional guidance on implementing these requirements can be found in the [STEP Model Ordinance, User Guide, and Best Practices Report](#) and on the Commerce webpage [Updating GMA Housing Elements](#).

We have a couple suggestions for strengthening your plan and development regulation amendments that we encourage you to consider during the current update, or in future amendments:

1. While the Adequate Provisions Checklists were submitted to Commerce (Appendix B), this appendix is not referenced in the draft comprehensive plan draft. Please reference Appendix B in your draft comp plan and add it to the Appendices section of the plan.
2. An inventory of existing capital facilities owned by public entities, including green infrastructure, is required under [RCW 36.70A.070\(3\)\(a\)](#) (as amended in 2023) and [WAC 365-196-415\(a\)](#). Within the inventory, we suggest identifying which facilities are “green infrastructure” according to the statutory definition.

Congratulations to you and your staff for the good work these amendments represent. If you have any questions or concerns about our comments or any other growth management issues, please contact me at 360.725.3044, or eric.guida@commerce.wa.gov. We extend our continued support to the City of Burien in achieving the goals of the Growth Management Act.

Sincerely,

Eric Guida

Eric Guida, Senior Planner
Department of Commerce, Growth Management Services Unit

cc:

David Andersen, AICP, Managing Director, Growth Management Services
Valerie Smith, AICP, Deputy Managing Director, Growth Management Services
Carol Holman, MUP, Western Regional Manager, Growth Management Services
Ben Serr, AICP, Eastern Regional Manager, Growth Management Services
Anne Fritzel, AICP, Housing Section Manager, Growth Management Services
Laura Hodgson, Housing Planning and Data Manager, Growth Management Services
Liz Underwood-Bultmann, AICP, Principal Planner, Puget Sound Regional Council

From: Highline United Methodist Church <office.highlineumc@gmail.com>
Sent: Wednesday, June 19, 2024 1:09 PM
To: Public - Planning Commission <planningcommission@burienwa.gov>
Subject: First Ave Proposed Zoning

Hello Commissioners,

The proposed zoning changes to 1st Ave S at S 128th St are for MU-2 and change to MU-1 just south of 128th. Highline United Methodist Church is located at 13015 1st Ave S which would be MU-1. We are planning to redevelop our property to have a multi-level building with commercial space on the ground level for non profits with affordable housing apartments above. In order for a housing provider to build affordable apartments having a higher height limit will be essential. We ask that you consider extending the MU-2 zone south on 1st Ave S to S 130th Pl.

Sincerely,

Jenny Partch

Pastor

Highline UMC

13015 1st Ave S

Burien, WA 98168

206-241-5520

From: A. Anderson <birdshateme@gmail.com>
Sent: Monday, June 24, 2024 4:52 PM
To: Public - Planning Commission <planningcommission@burienwa.gov>
Subject: Community Priorities for Boulevard Park

Dear City Planners,

My name is A. Anderson, a resident of 12th Ave S in Boulevard Park, and I am writing to bring to your attention some critical needs and priorities that our community has identified.

Firstly, we believe there is a strong need for an indoor community area specifically for teens. This space would provide a safe and constructive environment for our young residents, offering them various activities and opportunities for personal development.

Additionally, our neighborhood would greatly benefit from the establishment of a grocery store and a gym. These amenities would significantly improve our quality of life by providing convenient access to essential goods and services.

Another pressing issue is the lack of bike lanes. Many residents have expressed the need for dedicated bike paths to ensure the safety of cyclists and encourage environmentally friendly transportation options.

Moreover, a large majority of us are currently on septic systems, and there is a desperate need for an updated and efficient sewer system. This upgrade would greatly enhance public health and environmental sustainability in our area.

Speeding is another serious concern, particularly on 12th Ave S, where I frequently observe vehicles traveling at dangerous speeds. Implementing speed bumps in critical areas would help to mitigate this issue and enhance the safety of our streets.

Finally, we would like to request an increased police presence in our community. This would help to deter crime and ensure the safety and well-being of all residents.

Thank you for your attention to these important matters. We are hopeful that with your support, we can work together to address these needs and enhance the quality of life in Boulevard Park.

Sincerely,

A. Anderson
12437 12th Ave S
Boulevard Park Resident

From: JoAnn Pasek <jpasek1400@gmail.com>

Sent: Monday, June 24, 2024 8:17 PM

To: Public - Planning Commission <planningcommission@burienwa.gov>

Subject: Petition re: proposed rezoning

Please add the subject petition as public comments on the 2024 Burien Comprehensive Plan.

1 OF 2

PETITION

To the Burien Planning Commission:

We live in the area bounded by 148th St SW to 146th St SW and from 6th Ave SW to 8th Ave SW.

We want to preserve our quiet residential neighborhood by:

1. Taking us out of Burien's downtown urban core and returning the northern border of downtown to 148th St SW, as it was previously. We do not want our streets to be "priority networks" for traffic (Burien Master Transportation Plan dated 4/24/24).
2. Keeping it as residential low instead of upzoning it to residential medium.

Signed:

Name	Address	Date
Kathleen M. Palmer	14637 7 th SW	6/18/24
Heybi Corrales	14636 7 th Ave SW	6/18/24
Tori Newburn	14618 7 th Ave SW	6-18-24
Serina Newburn	14618 7 th Ave SW	6-18-24
Sharon Lajoie	14613 7 th Ave SW	6-18-24
Erik Newfen	14613 7 th Ave SW	6-18-24
Micki Fitzgerald	14612 7 th Ave SW	6/18/24
STEVEN BERGLUND	617 SW 146 th ST	6/18/24
DANIEL R BERGLUND	721 SW 146 th ST	6/18/24
Anna J. Denton	14654 8 th Ave SW	6/20/24
Annelle G Clifford-Holt	14648 8 th Ave SW	6-20-24
Yoni Kiehl	705 SW 146 th St Burien WA	6/20/24
Jenna Givers	14631 6 th Ave SW	6/20/2024
Jeremiah Givers	14631 6 th Ave SW	6/20/2024

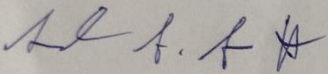
PETITION

To the Burien Planning Commission:

We live in the area bounded by 148th St SW to 146th St SW and from 6th Ave SW to 8th Ave SW.

We want to preserve our quiet residential neighborhood by:

1. Taking us out of Burien's downtown urban core and returning the northern border of downtown to 148th St SW, as it was previously. We do not want our streets to be "priority networks" for traffic (Burien Master Transportation Plan dated 4/24/24).
2. Keeping it as residential low instead of upzoning it to residential medium.

Signed: 

Name Adam Sirovch-Martin Address 14648 7th Ave SW Date 06/21/24

Nehemias Velasquez	14636 7 th AVE SW	Burien WA
Neal Amara	14636 8 th Ave SW	6/21/24
Efron AENATA	14637 6 th AVE SW	Burien 6/24/24
Michael Ho	14637 6 th Ave SW	Burien 6/24/24
JoAnn Pesek	14628-7 th Ave SW	" 6/24/24

From: Charles Schaefer <charlesschaefer89@gmail.com>
Sent: Monday, June 24, 2024 10:04 PM
To: Public - Planning Commission <planningcommission@burienwa.gov>
Subject: Fwd: Request for Complan / Zoning Change

Planning Commissioners,

I am requesting that at your June 26th meeting you change the areas designated Residential Medium / R-4 in the Sunnysdale neighborhood (the area bordered by SR 509, SR 518, 8th Ave S / Des Moines Memorial Drive, and S 160th St; I have attached a zoomed in section of your draft zoning map below) to Commercial Mixed Use / MU-1.

I would start by noting that this isn't a significant change in intensity and therefore isn't outside the scope of alternatives that were studied by consultants. I would also note that the Performing Arts Center is designated MU-2 and given the inclusion of most of Sunnysdale in the Creative District (due to the presence of the PAC and Moshier Art Center) one could argue for MU-2 CD zoning within the neighborhood, but since that is outside the scope of what was looked at I am only asking for MU-1.

There is already a small patch of mixed use proposed along S 152nd street, a street which has had no transit service since the express route 122 was eliminated during the pandemic. Meanwhile, S 156th street has the RapidRide F Line and the route 161. If 152nd can accommodate mixed use, surely 156th can as well. I would also point out that the Sunnysdale neighborhood has good sidewalk infrastructure and already generates foot traffic from, in addition to the arts facilities I mentioned above, Highline High School and the Transform Burien (Sunnysdale Elementary) site as well as the connection to the lake to sound trail. This supports ground floor uses in excess of what would be allowed under R-4 zoning. Downtown Burien and Five Corners are also directly accessible to the neighborhood from either the 152nd street or 156th street overpass.

While Sunnysdale has a diverse mix of housing stock (which coexist well together), it predominantly consists of three-story apartment complexes. Several of the buildings are old, mine was built in the 1950s. My concern is that a developer seeing R-4 zoning and that there are already three-story apartments there would probably not choose to redevelop in the neighborhood. Seeing a mixed use designation would be more attractive, and redevelopment could result in additional units of housing. You are well aware of our city's housing and jobs targets and Sunnysdale should do its share of helping to meet both goals.

Thank you for considering this proposal.

PS: I would also like to express my support for two other proposals you may be hearing: taking the neighborhood west of the community center out of the Urban Center (which, prior to 2020, did not extend north of 148th) as well as extending the MU-2 zone at 1st and 128th south to include Highline United Methodist Church.



From: Yosuf Kushan <kushanrealty@gmail.com>

Sent: Tuesday, June 25, 2024 11:07 AM

To: Public - Planning Commission <planningcommission@burienwa.gov>

Subject: Planning Commission Recommendation: Riverton-Boulevard Park Community Garden

Good Morning,

My name is Yosuf Kushan and I am a resident of the Riverton-Boulevard Park neighborhood. I would like to bring a recommendation to the Planning commission as someone who cares about the well being of their community.

The S 120th St which merges off from 24th Ave S has unpaved Public land which is sometimes used as side street parking. S 120th St is the main access street for the Whisperwood Apartment complex, Boulevard Heights community, and 100 other homes in the vicinity.

The unpaved Public land S 120th St is frequently used as dumping grounds for abandoned vehicles, trash and litter. This vicinity is also lacking public green spaces for residents such as parks and outdoor amenities.

I would like to recommend the planning commission a solution which will keep our community green, clean, safe and walkable- **A Community Garden** to replace the unpaved side street on S 120th St.

The community garden is a very affordable alternative to uniting our community, allowing green spaces, while bringing an easily accessible outdoor amenity. Community gardens are frequently practiced in Seattle neighborhoods which become more dense, and need public green areas for communities to bond. Likewise our Boulevard-Park neighborhood community continues to grow and the city will have to accommodate to its residents and beautify the neighborhood.

Please see attached photos of Project target, and photos of community gardens which can be utilized and replace the unpaved side street.

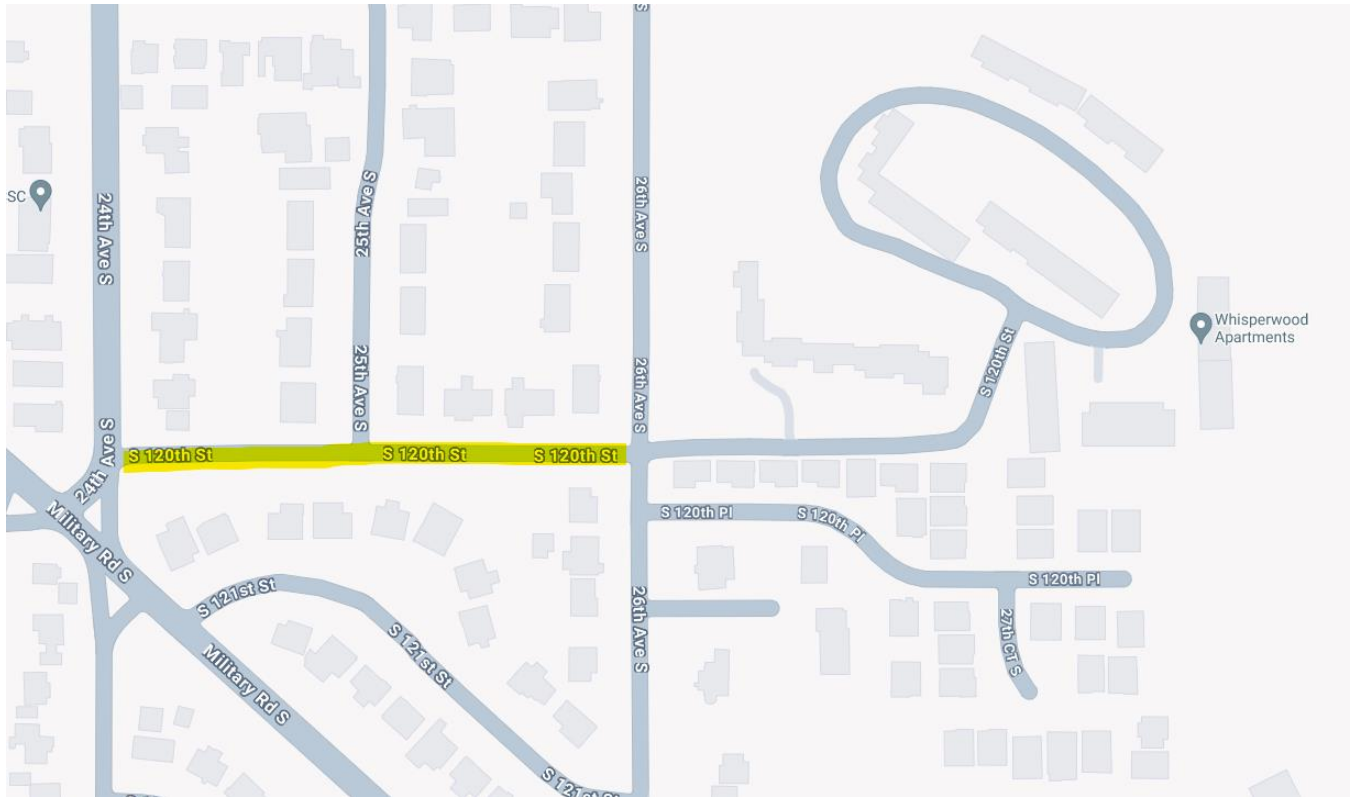
For further questions or concerns, please contact me:

Yosuf Kushan

P: (925) 339-8152

E: KushanRealty@Gmail.com

S 120th St Map:



Community Garden Recommendation:



From: [Michael S.](#)
To: [Public - Planning Commission](#)
Subject: Ambaum Corridor Proposals and Revisions Comments
Date: Wednesday, June 26, 2024 7:55:35 PM

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Planning Commission members, I am a homeowner in the Ambaum corridor on SW 139th St. who would be impacted by the up zone to R4. I have reviewed the current materials, including the current "preferred alternative" and zoning map changes. I also viewed most of the meeting of June 26 via Zoom.

My neighborhood is fairly quiet, despite its proximity to Ambaum. R4 Increased density can mean increased neighborhood noise and congestion too. I noted that the 2017 city development map was clear about my neighborhood being zoned as Low Residential, and my neighborhood currently reflects that.

The meeting slide that indicated height does not conform to the text for the Residential Medium description, the exemptions or the apparent intent of the Commission. This is a loophole that will be exploited. Up zoning to R4, Residential Medium, appears to actually allow up to 75 ft high because of exceptions for multifamily housing. Current zoning is Low residential-- 35ft. max. My neighborhood has no current buildings more than about 30-35 feet high (2 stories, including roof), right now. Without a specific floor limit--maximum is two now (including the roof), you could indeed get that six floor building some have mentioned for affordable housing.

Regarding density: Single level SidexSide duplexes/triplexes/ADU/DADU's with sufficient parking should be OK--but NOT horizontally stacked three level units. Without more specific design criteria for those in the up zones off of Ambaum, the density should also be at the extreme low end of 20-60 units per acre. Saying it needs to match the character of the neighborhood is too vague and leave too much room for approvals that actually will not match that character. Who decides there is even space for a duplex or triplex and what standard are they going to use?

Leaving unelected city planners to decide if it "fits the scale of the neighborhood as it is at the time of construction" is also too vague. This was the mistake made in Seattle that did not have a specific design review actually enforced that became only cursory and often ignored via arbitrary variances granted. The proposed Burien variance for multi-family is particularly concerning in this neighborhood. These are details that must be specifically included before any council vote, not something to be done later or left up to unelected city planners.

Ambaum already has been choked off, especially during the commute hours, putting in more than some duplexes and triplexes along this corridor will likely degrade it even further. Keep in mind that too low residential parking requirements in R4 zones

do not discourage cars, but encourages them to park on the street instead, creating long term parking congestion.

I am also concerned about additional increases in property taxes for everyone in the near future via higher tax appraisals directly impacted by this up zone. It will increase land values in the updated R4 zones that will be reflected in assessments long before much if anything is actually built. This does not reflect the affordability question positively for current or future residents. Many of current homeowners in this neighborhood are retirees on fixed incomes. There are also lower income renters in this area who will see their rents rise even higher than they would have without this up zone. All the above is not fear, but predictable reality--See Seattle.

Finally, Burien may be actually losing population now per the latest reports, so planning for a boom at this point may be aspirational. It may already be too late to do this sustainably without major displacement in some areas. The upward revisions of the number of units/density should be accommodated by existing vacant lots, especially closer to and in the downtown core. You are "spreading this out" too far and it will defeat your purposes.

This particular area between SW137th and SW142nd can handle some increased density via ADU/DADU's, duplexes and triplexes. But not at the level being proposed. I strongly disagree this is an "equitable" or appropriate zoning change for this neighborhood at the levels proposed. This will only be a boon for developers and their contractors, and decrease affordability by tearing down existing more affordable homes and increasing the cost of new and existing ones, just like it did in Seattle.

Sincerely,

Michael Spindler

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Wednesday, August 7, 2024 11:49 PM
To: Lisa Grueter <Lisa@berkconsulting.com>
Subject: FW:

Lisa Grueter, AICP is a Principal at BERK focus on land use planning. Her phone number is **206-324-8760** and email is lisa@berkconsulting.com

Hello Lisa Grueter;

I am contacting you because I have seen you at the Burien City Council Meetings presenting with Liz Stead on the 2024 draft Burien Plan. I was left with the distinct impression that BERK was helping to develop the maps for this plan.

Please see my request below to Liz Stead for a clearer and more delineated version of the draft 2024 Land Use Map-the version sent on to the Council by the Planning Commission

Perhaps you can help with providing that to me-from the mapping service or consultant BERK is using-such a draft map?

Also, I had a question about the strange draft Land Use Change that appears to be reflected in this draft 2024 Land Use Map for the Gregory Heights Neighborhood to the city of Normandy Park boundary-changing lot sizes from 7200' Medium Residential to 12,000'Residential Low 1 per color key change? See page 5 of 88 of the July 31, 2024 Memo that Liz Stead included in the Aug. 5, 2024 Council meeting agenda packet. The maps included in this Memo packet are very difficult to read clearly.

Respectfully,

Dr.C.Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Wednesday, August 7, 2024 10:32 AM
To: 'Amanda McIntire' <AmandaMc@burienwa.gov>
Cc: 'Adolfo Bailon' <adolfo@burienwa.gov>
Subject:

Hello Amamda and Liz Stead,

Please forward this to Liz Stead as I don't have her email address.

Thank you for meeting with me. This is the email you sent me following that meeting.

Good Morning Chestine,

I wanted to reach out and first apologize that the initial email that was sent did not go through, as the size of the PDF exceeded the maximum size. You will be able to find the published, Draft Comprehensive plan (which has a total of 241 pages). You will want to go to the following website, scroll down and select the project documents tab, where you will find the Draft Comprehensive Plan document. This will be located in the last subsection, titled "Drafts".

<https://connect.burienwa.gov/projects/comprehensive-plan-update/>

Please note the maps provided within this draft have been updated, and you can find the most recent Comp Plan Maps in the City Council agenda (which I have attached). Please reach out if you have any additional questions.

Best,

Amanda McIntire (she/her)
Planner

The link you sent to me only shows a vague/fuzzy version of the draft 2024 Land Use Map and an incomplete draft 2024 Zoning table for my neighborhood-The Lake Burien Neighborhood. It is difficult for me as a citizen- to make accurate and appropriate comments lacking this detail.

I would appreciate it if you could send me a link to a copy of the 2024 draft Land Use Map showing the specific streets-names or number addresses- that will be experiencing a Land Use change and a Zoning Use change (no matter how much I try I cannot get the maps enclosed in the Agenda Meeting Packet for Aug. 5, 2024 to enlarge to show this detail) in my neighborhood as a result of this draft map change. As I mentioned to you, my neighbors and I did not receive a notice of these changes. You can find a copy of the Land Use Map and Zoning changes that created the Lake Burien Neighborhood in 2014. Also, the changes that resulted are shown on the map in the Burien Maps Library-Land Use Map-the key at the bottom left of the map

indicates what happened in the year 2014 and Ordinance 614-12/15/14, adopted 12/27/14 that changed it. Also, there was a Zoning Map Change to my neighborhood in 2014. I believe that the Planning Commission may have been working from a different map(s) to make their 2024 draft Land Use decisions because the interactive map the consultant(s) provided to you/them fails to show the Lake

Burien Neighborhood as having Critical Areas in its overlay choices. In Exhibit 2.5 page 27 of 88, Residential Low 2 allows density at 15 to 40 units per acre. That is inappropriate for my neighborhood and inconsistent with the SMP. I even question Residential Low 1 which shows density at 8-20 units per acre when these lots are 12,000'? Most of these 12,000' city lots are impacted with Critical Areas and/or steep slopes and historically have been at a density of 4 lots per acre and were previously designated as SF residential low density lots- allowing 2 ADU per housing unit with the primary house.

Also, the new draft Land Use Map shows the Gregory Heights Neighborhood (to the Normandy Park boundary) being changed from SF residential-7,200'-moderate density lots to 12,000'-low density SF residential lots-Residential Low 1. I'm not sure what new Critical Areas/Sensitive Areas warrant this change in the new draft Land Use Map? And a zoning change? Especially if the city is struggling to meet its housing nos.?

I look forward to receiving the draft map materials showing the clear street designations from you-ASAP. Thank you.

Respectfully,

Dr.C.Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Monday, August 19, 2024 3:45 AM

To: Public - City Clerk <cityclerk@burienwa.gov>; Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Linda Akey <LindaA@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>; Public - Planning <planning@burienwa.gov>

Cc: Adolfo Bailon <AdolfoB@burienwa.gov>

Subject: CTTC - FW: Relating to the development of the 2044 draft Burien Comp Plan and draft EIS for the 2044 draft Burien Comp Plan-Lake Burien Neighborhood

To the Burien City Clerk-Please place this letter in Comments to the Council and in the minutes to the meeting for the August19, 2024 Council meeting.

Only include the email dated August 17, 2024 to the Council. Please do not include the earlier part of the email string

Please distribute this email letter to the Council ASAP before the start of the Aug. 19, 2024 meeting as it relates to the update of the 2044 draft Burien Comp Plan-

an item that is continuously being presented on at Council meeting until early Oct. 2024. Thank you for your assistance.

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Saturday, August 17, 2024 4:46 AM

To: 'Chaney Skadsen' <ChaneyS@burienwa.gov>

Cc: 'Adolfo Bailon' <adolfoB@burienwa.gov>

Subject: RE:

To Chaney Skadsen;

Please pass the contents of this email with Liz Stead and the Planning Commission members

I realize that you are very new to the city of Burien Planning Department and the development of the 2044 draft Burien Comp Plan process.

I have spoken with Liz Stead about some of my concerns about this draft Comp plan. As I review it more my concerns remain. Perhaps my largest concerns right now are:

a.The 2044 draft Plan has a confused current Land Use Map(Alternative 1 map) that does not match the current Land Use Map(LU-1) but claims to be a consolidated version that is blurry and not easy, sharply presented and clearly marked for the average citizen to read, reinterpret, and understand. The legend and keys have been altered without clear explanation of how they were altered.

b. A draft 2044 Burien EIS document was developed from this alternative 1 map and two other alternative maps(alternative 2 and alternative 3 maps) to create the new 2044 Draft Plan Land Use map for the 2044 draft Comp Plan. However, historically where the alternative 2 and alternative 3 maps were derived from is also not clear. Again, both of those maps(2&3)have physical clarity and readability

problems. The public, other governmental agencies, media sources, tribes, neighborhood community clubs and some individuals where “notified/mailed to by the city” as noted in the 2044 Burien(Draft) EIS document, Distribution List, page xi- January 10,2024 to provide input to the draft EIS and SEPA documentation. I suspect they were also notified of the public hearing before the Planning Commission on this document.

c. Because my neighborhood, the Lake Burien Neighborhood and Lake Burien Shore Community Club, did not receive a mailing notice, as evidenced by the Distribution List, we were unable to know about and timely participate in responding to the Draft EIS or the public hearing on it. This appears to be a “lack of notification process” problem under the GMA for developing Comprehensive Plans and EIS statements. The Lake Burien Neighborhood and the Lake Burien Shore Club have been known of by the city for many years and should have been notified by mailing.

1.The Land Use in my Lake Burien neighborhood appears to be changed in several areas of the neighborhood in this 2044 draft. The current land use map showing the neighborhood is not accurate or correct according to the current LU-1- as shown in the Burien Map Library. Also, there is no Zoning Map or Zoning table in this draft that accurately depicts the Zoning.

2. To the best of my knowledge, the Planning Commission appears to have used an inaccurate LU-1 Map (alternative 1) and an inaccurate interactive map developed by the consultant (it failed to accurately show my neighborhood as Critical Area) plus the alternative map 2 and alternative map 3 (I am not sure where these two maps historically came from). They appear to be a 2023 invention of Berk and Maker, then struck out and then were used to decide about what the draft land use would be for the 2044 draft Plan- Land Use Map- but not based on accurate/actual land use, critical areas and zoning information.

3. I mentioned to Liz Stead that I and my neighborhood members had not received notice about this draft Land Use change and Zoning table change. She told me that she was sure that the city had notified me and my neighborhood about this process, but it had happened before she was hired by the city. Again, I said we had not gotten notice and the only way I even knew about a hearing was from a local media post. But in reading the media stories. they had not mentioned changes to my neighborhood. She said she would research it. The 2044 draft Plan in its narrative and posting about the Plan discusses changes to the Ambaum Corridor, changes to the Boulevard Corridor and changes to the Downtown Urban Center but does not mention changes to the Lake Burien Neighborhood as established by Ordinance 614-a neighborhood that currently is Single Family low density residential 12,000' zoned at 4 units per acre. This new draft Plan proposes to rezone it to Residential Low 2(new designation) allowing 15-40 units per acre. That is a massive density change that is inappropriate for land use and zoning to a critically impacted, environmentally fragile area that already is experiencing significant issues of climate change. The issues that impact even one lot on this lake, impact all the lots due to the shared lake environment.

4. While I attended a couple of community meeting at the Burien Library and provided written input to Berk and the city staff, I had not received any information about the draft EIS for this draft Plan or about the EIS hearing which discussed how the draft Land Use map was established. Having just requested a link to the draft EIS and read it, I see that neither I or my neighborhood community club (Lake Burien Shore Club) received notice of this EIS or of the hearing on it. My neighborhood community club has been in existence since the 1950s. On numerous occasions, it and its members has provided comments and physical reports to the city over these last 31 years. It actively provided comments and documents during the SMP process. It provided documents for Ordinance 614-the establishment of the Lake Burien

Neighborhood- which resulted in a change to the LU-1 Map. So, it is unclear as to why it was not included on the draft EIS mailing notice. The Lake Burien Neighborhood and its community club members have not been receiving adequate notice on the 2044 draft Comp Plan as is required by the GMA.

5. The changes proposed in this draft Comp Plan for the Lake Burien Neighborhood do not appear to me to be appropriate or consistent with the SMP and the GMA. They fail to recognize that “the land speaks first” in deciding land use on a Land Use Map and in the text of the plan; zoning only follows developed because of that. The GMA requires citizen participation, information to be developed such as it is written in language to be understandable to the average citizen and that adequate public notice be provided to citizens/residents, tribes, govt. agencies and business owners for reviews and hearings.

6. I am requesting that changes be made to; this 2044 draft Plan for the Lake Burien Neighborhood on the Land Use Map, Zoning designations and regulations be adjusted (when developed per the posted tables) and on the developed Zoning map and an adjustment in the Plan text language describing and designating the neighborhood. That a map change and adjustment be made for what is currently Planning Area 2. This area has never been commercial or commercial mixed in use to the best of my knowledge. That a Land Use map change & Plan text use language be added recognizing the historical importance of this area and the long-term use of the site for Foster children’s care and treatment, Transitional housing for foster children and services to families and children in crisis-for over 100 yrs. It was donated by Judge Dykeman to the community for that specific purpose. There continues to be a current and urgent need for this kind of land use and housing for children and families into the future. That a map be added to the draft Plan showing land use intensity as well as and relating to the commercial node intensity map. That the Plan’s Stormwater map be corrected to show the correct no. and locations of the stormwater outlets into the lake. And that the flooding and climate change problems the lake and the surrounding residents face be discussed in the draft. That all maps and exhibits included in the draft Plan be clear, labelled, and readable to the average citizen. That the Lake Burien Shore Club/community club be added to the distribution list for this draft Plan and any other draft EIS or SEPA decisions related to this draft Plan. That Dr. R. Edgar and Dr. C. Edgar also be added to the Distribution List. And that any other comments and requests made by other members of the Lake Burien Shore Club be noted and considered by the Planning Commission to be recommended to the Council before the plan is voted on by the Council.

Further, the Highline Times no longer exists as a separate media source. However, it is now contained in the West Seattle Weekly- a completely online publication. I encourage the city to change its distribution list for Planning Dept. publications. The two remaining media sources in the city are: The Burien-News.com-online and single hardcopy paper media and The B-Town Blog-on line media source for Burien.

7. That the Land Use and Zoning changes that appears to have happened to the Gregory Heights Neighborhood up to the Normandy Park Boundary (in this draft as displayed on the draft Land Use Map) be reevaluated by the Commission, if the city is under extreme pressure to provide adequate land for housing development and density to meet its growth numbers.

8. Please pass these comments on to Liz Stead and to members of the Planning Commission. Thank you.

If you have any questions, please contact me.

Respectfully,

Dr.C.Edgar

From: Chaney Skadsen <ChaneyS@burienwa.gov>
Sent: Thursday, August 15, 2024 11:33 AM
To: 12674shore@gmail.com
Cc: Adolfo Bailon <AdolfoB@burienwa.gov>; Liz Stead <LizS@burienwa.gov>
Subject: RE:

Good morning, Dr. C. Edgar,

I appreciate your email and suggestions. I will follow up on the organizations and facilities you have mentioned below and continue to update the inventory of STEP Housing projects within the city accordingly.

Kindly,

Chaney Skadsen
Senior Planner

City of Burien
206-439-3152 Office
206-507-1970 City Cell
ChaneyS@burienwa.gov
Burienwa.gov

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From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Wednesday, August 14, 2024 5:54 PM
To: Chaney Skadsen <ChaneyS@burienwa.gov>
Cc: Adolfo Bailon <AdolfoB@burienwa.gov>
Subject:

Hello City Planning Staff and members of the Planning Commission,
Chaney Skadsen ChaneyS@burienwa.gov
Liz Stead

Looked over your agenda for tonight on the topic of STEP housing. Burien for years has had a fair amount of Transitional Housing the Planning Dept. overlooks and

doesn't put in its reports. Perhaps they don't know about it? It is the housing owned and operated through NAVOS. And again, I don't see it displayed on the chart in

the agenda packet.

Definitions from HB 1220 • Emergency Shelter: A facility providing temporary shelter, that can include day only access and warming centers that do not provide overnight accommodations (RCW 36.70A.030(15)) • Emergency Housing: Temporary indoor accommodations to address basic health, food, clothing and personal hygiene needs (RCW 36.70A.030(14)) • Transitional Housing: A facility that provides housing and supportive services to facilitate the movement of individuals and families experiencing homelessness into permanent housing (RCW 84.36.043(3)(c)) • Permanent Supportive Housing: Subsidized, leased housing, utilizing admissions practices with lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing and is paired with on-site or off-site voluntary services (RCW 36.70A.030(31))

Planning Area 2 on Lake Burien has always had Transitional Housing and it has just been recently announced that it is going to be expanded. The Transition Bridge for youth leaving the foster System was funded by a State Grant. And other housing units are being reopened.

The NAVOS campus on 136th owns numerous apts. close to it that provide Transitional Housing up to- I believe- 2 yrs. and I don't see any of them mentioned on any city housing count charts.

I suggest you contact NAVOS as it provides the largest amount of treatment in this housing that they own- 40% of King County benefits from it.

Respectfully,

Dr.C.Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Monday, August 19, 2024 3:45 AM

To: Public - City Clerk <cityclerk@burienwa.gov>; Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Linda Akey <LindaA@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>; Public - Planning <planning@burienwa.gov>

Cc: Adolfo Bailon <AdolfoB@burienwa.gov>

Subject: CTTC - FW: Relating to the development of the 2044 draft Burien Comp Plan and draft EIS for the 2044 draft Burien Comp Plan-Lake Burien Neighborhood

To the Burien City Clerk-Please place this letter in Comments to the Council and in the minutes to the meeting for the August 19, 2024 Council meeting.

Only include the email dated August 17, 2024 to the Council. Please do not include the earlier part of the email string

Please distribute this email letter to the Council ASAP before the start of the Aug. 19, 2024 meeting as it relates to the update of the 2044 draft Burien Comp Plan-

an item that is continuously being presented on at Council meeting until early Oct. 2024. Thank you for your assistance.

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Saturday, August 17, 2024 4:46 AM

To: 'Chaney Skadsen' <ChaneyS@burienwa.gov>

Cc: 'Adolfo Bailon' <adolfoB@burienwa.gov>

Subject: RE:

To Chaney Skadsen;

Please pass the contents of this email with Liz Stead and the Planning Commission members

I realize that you are very new to the city of Burien Planning Department and the development of the 2044 draft Burien Comp Plan process.

I have spoken with Liz Stead about some of my concerns about this draft Comp plan. As I review it more my concerns remain. Perhaps my largest concerns right now are:

a. The 2044 draft Plan has a confused current Land Use Map (Alternative 1 map) that does not match the current Land Use Map (LU-1) but claims to be a consolidated version that is blurry and not easy, sharply presented and clearly marked for the average citizen to read, reinterpret, and understand. The legend and keys have been altered without clear explanation of how they were altered.

b. A draft 2044 Burien EIS document was developed from this alternative 1 map and two other alternative maps (alternative 2 and alternative 3 maps) to create the new 2044 Draft Plan Land Use map for the 2044 draft Comp Plan. However, historically where the alternative 2 and alternative 3 maps were derived from is also not clear. Again, both of those maps (2&3) have physical clarity and readability problems. The public, other governmental agencies, media sources, tribes, neighborhood community clubs and some individuals were "notified/mailed to by the city" as noted in the 2044 Burien (Draft) EIS document, Distribution List, page xi- January 10, 2024 to provide input to the draft EIS and SEPA

documentation. I suspect they were also notified of the public hearing before the Planning Commission on this document.

c. Because my neighborhood, the Lake Burien Neighborhood and Lake Burien Shore Community Club, did not receive a mailing notice, as evidenced by the Distribution List, we were unable to know about and timely participate in responding to the Draft EIS or the public hearing on it. This appears to be a “lack of notification process” problem under the GMA for developing Comprehensive Plans and EIS statements. The Lake Burien Neighborhood and the Lake Burien Shore Club have been known of by the city for many years and should have been notified by mailing.

1. The Land Use in my Lake Burien neighborhood appears to be changed in several areas of the neighborhood in this 2044 draft. The current land use map showing the neighborhood is not accurate or correct according to the current LU-1 - as shown in the Burien Map Library. Also, there is no Zoning Map or Zoning table in this draft that accurately depicts the Zoning.

2. To the best of my knowledge, the Planning Commission appears to have used an inaccurate LU-1 Map (alternative 1) and an inaccurate interactive map developed by the consultant (it failed to accurately show my neighborhood as Critical Area) plus the alternative map 2 and alternative map 3 (I am not sure where these two maps historically came from). They appear to be a 2023 invention of Berk and Maker, then struck out and then were used to decide about what the draft land use would be for the 2044 draft Plan- Land Use Map- but not based on accurate/actual land use, critical areas and zoning information.

3. I mentioned to Liz Stead that I and my neighborhood members had not received notice about this draft Land Use change and Zoning table change. She told me that she was sure that the city had notified me and my neighborhood about this process, but it had happened before she was hired by the city. Again, I said we had not gotten notice and the only way I even knew about a hearing was from a local media post. But in reading the media stories, they had not mentioned changes to my neighborhood. She said she would research it. The 2044 draft Plan in its narrative and posting about the Plan discusses changes to the Ambaum Corridor, changes to the Boulevard Corridor and changes to the Downtown Urban Center but does not mention changes to the Lake Burien Neighborhood as established by Ordinance 614-a neighborhood that currently is Single Family low density residential 12,000' zoned at 4 units per acre. This new draft Plan proposes to rezone it to Residential Low 2(new designation) allowing 15-40 units per acre. That is a massive density change that is inappropriate for land use and zoning to a critically impacted, environmentally fragile area that already is experiencing significant issues of climate change. The issues that impact even one lot on this lake, impact all the lots due to the shared lake environment.

4. While I attended a couple of community meeting at the Burien Library and provided written input to Berk and the city staff, I had not received any information about the draft EIS for this draft Plan or about the EIS hearing which discussed how the draft Land Use map was established. Having just requested a link to the draft EIS and read it, I see that neither I or my neighborhood community club (Lake Burien Shore Club) received notice of this EIS or of the hearing on it. My neighborhood community club has been in existence since the 1950s. On numerous occasions, it and its members has provided comments and physical reports to the city over these last 31 years. It actively provided comments and documents during the SMP process. It provided documents for Ordinance 614-the establishment of the Lake Burien Neighborhood- which resulted in a change to the LU-1 Map. So, it is unclear as to why it was not included on the draft EIS mailing notice. The Lake Burien Neighborhood and its community club members have not been receiving adequate notice on the 2044 draft Comp Plan as is required by the GMA.

5. The changes proposed in this draft Comp Plan for the Lake Burien Neighborhood do not appear to me to be appropriate or consistent with the SMP and the GMA. They fail to recognize that “the land speaks first” in deciding land use on a Land Use Map and in the text of the plan; zoning only follows developed because of that. The GMA requires citizen participation, information to be developed such as it is written in language to be understandable to the average citizen and that adequate public notice be provided to citizens/residents, tribes, govt. agencies and business owners for reviews and hearings.

6. I am requesting that changes be made to; this 2044 draft Plan for the Lake Burien Neighborhood on the Land Use Map, Zoning designations and regulations be adjusted (when developed per the posted tables) and on the developed Zoning map and an adjustment in the Plan text language describing and designating the neighborhood. That a map change and adjustment be made for what is currently Planning Area 2. This area has never been commercial or commercial mixed in use to the best of my knowledge. That a Land Use map change & Plan text use language be added recognizing the historical importance of this area and the long-term use of the site for Foster children’s care and treatment, Transitional housing for foster children and services to families and children in crisis-for over 100 yrs. It was donated by Judge Dykeman to the community for that specific purpose. There continues to be a current and urgent need for this kind of land use and housing for children and families into the future. That a map be added to the draft Plan showing land use intensity as well as and relating to the commercial node intensity map. That the Plan’s Stormwater map be corrected to show the correct no. and locations of the stormwater outlets into the lake. And that the flooding and climate change problems the lake and the surrounding residents face be discussed in the draft. That all maps and exhibits included in the draft Plan be clear, labelled, and readable to the average citizen. That the Lake Burien Shore Club/community club be added to the distribution list for this draft Plan and any other draft EIS or SEPA decisions related to this draft Plan. That Dr. R. Edgar and Dr. C. Edgar also be added to the Distribution List. And that any other comments and requests made by other members of the Lake Burien Shore Club be noted and considered by the Planning Commission to be recommended to the Council before the plan is voted on by the Council.

Further, the Highline Times no longer exists as a separate media source. However, it is now contained in the West Seattle Weekly- a completely online publication. I encourage the city to change its distribution list for Planning Dept. publications. The two remaining media sources in the city are: The Burien-News.com-online and single hardcopy paper media and The B-Town Blog-on line media source for Burien.

7. That the Land Use and Zoning changes that appears to have happened to the Gregory Heights Neighborhood up to the Normandy Park Boundary (in this draft as displayed on the draft Land Use Map) be reevaluated by the Commission, if the city is under extreme pressure to provide adequate land for housing development and density to meet its growth numbers.

8. Please pass these comments on to Liz Stead and to members of the Planning Commission. Thank you.

If you have any questions, please contact me.

Respectfully,

Dr.C.Edgar

From: Chaney Skadsen <ChaneyS@burienwa.gov>
Sent: Thursday, August 15, 2024 11:33 AM
To: 12674shore@gmail.com
Cc: Adolfo Bailon <AdolfoB@burienwa.gov>; Liz Stead <LizS@burienwa.gov>
Subject: RE:

Good morning, Dr. C. Edgar,

I appreciate your email and suggestions. I will follow up on the organizations and facilities you have mentioned below and continue to update the inventory of STEP Housing projects within the city accordingly.

Kindly,

Chaney Skadsen
Senior Planner

City of Burien
206-439-3152 Office
206-507-1970 City Cell
ChaneyS@burienwa.gov
Burienwa.gov

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From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Wednesday, August 14, 2024 5:54 PM
To: Chaney Skadsen <ChaneyS@burienwa.gov>
Cc: Adolfo Bailon <AdolfoB@burienwa.gov>
Subject:

Hello City Planning Staff and members of the Planning Commission,

Chaney Skadsen ChaneyS@burienwa.gov

Liz Stead

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doesn't put in its reports. Perhaps they don't know about it? It is the housing owned and operated through NAVOS. And again, I don't see it displayed on the chart in

the agenda packet.

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Planning Area 2 on Lake Burien has always had Transitional Housing and it has just been recently announced that it is going to be expanded. The Transition Bridge for youth leaving the foster System was funded by a State Grant. And other housing units are being reopened.

The NAVOS campus on 136th owns numerous apts. close to it that provide Transitional Housing up to- I believe- 2 yrs. and I don't see any of them mentioned on any city housing count charts.

I suggest you contact NAVOS as it provides the largest amount of treatment in this housing that they own- 40% of King County benefits from it.

Respectfully,

Dr.C.Edgar

From: Ginele Marquez Lee <gmlee12th@yahoo.com>

Subject: Re: Updates from Council Member Sarah, August 19, 2024

Date: August 19, 2024 at 4:09:00 PM PDT

To: Burien Councilmember Sarah Moore <sarahm@burienwa.gov>

Hello Sarah!

In the comprehensive plan, the maps are blurry when downloading from the agenda site. Is there somewhere I can download something legible.

I'm looking at the critical areas maps page 81, 83, and 86 and it is blurry and unclear quality.

Help! Lol

Thank you for any guidance how I can get a high quality resolution of this,

Oh, and also where I can get the "2020 storm drainage master plan"

The link doesn't work in the posted version of the comprehensive plan from the agenda page. I think it's like photos of the document that they uploaded and not the actual document.

Ginele

From: Diane Wilson <bdbgwilson@comcast.net>
Sent: Thursday, August 29, 2024 10:50 AM
To: Liz Stead <LizS@burienwa.gov>
Cc: Kaitlyn Spore <sporoni126@gmail.com>; hanna.jim@gmail.com; daniel.j.dupre@gmail.com
Subject: RE: CTTC - Lake Burien proposed land use, zoning, density changes

Thank you so much Liz. The biggest concern is what is the procedure for notification and did the City follow that as it relates to the changes proposed in the Lake Burien Community. Many of the community members just recently heard of the changes and would like an opportunity to provide feedback for the Lake Burien area.

I realize this has been a two year process, but looking at the website, it just refers to Ambaum and the Boulevard Park neighborhoods. The website is a little cumbersome for me, so I may have missed something.

Thank you for your help. I want to be sure I am communicating correctly about the process and the opportunity for feedback. We are hearing that the plan may be finalized on September 23, so we would appreciate an opportunity to provide feedback before a decision is made.

Thank you,

Diane Wilson

Secretary, Lake Burien Shore Club

On 08/28/2024 4:49 PM PDT Liz Stead <lizs@burienwa.gov> wrote:

Diane,

Thank you for your communication. I am working on a comprehensive response and hope to have that out by end of week. I appreciate your patience as we respond to these questions and concerns.

Liz

Liz Stead

Community Development Director

City of Burien
(206) 248-5501 Office
(206) 300-7934 City Cell
LizS@burienwa.gov

Burienwa.gov

From: Diane Wilson <bdbgwilson@comcast.net>
Sent: Saturday, August 24, 2024 9:19 AM
To: Public - Council Inbox <Council@burienwa.gov>
Cc: Kaitlyn Spore <sporoni126@gmail.com>; hanna.jim@gmail.com; daniel.j.dupre@gmail.com
Subject: CTTC - Lake Burien proposed land use, zoning, density changes

CAUTION: This email originated from outside of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

I'm writing you today in my capacity as Secretary of the Lake Burien Shore Club. I received the below email from a resident on the lake and have sent this out to the Lake Burien Shore Club community. We would appreciate any insight you may be able to provide regarding this. There has been a lot of talk about the proposed changes in informal situations around the lake, but not sure everyone has the facts. I've included fellow board members, President Kaitlyn Spore-Lautman, Vice President Jim Hanna, and Treasurer Dan Dupre.

Thanks for your help.

Diane Wilson

Secretary, Lake Burien Shore Club

Hello Friends, Neighbors and members of the Lake Burien Shore Club:

You may not know of or be following the city's work on revising the Burien Comp Plan currently titled draft 2044Burien Comp Plan. Currently, the draft plan is being presented to the Council in sections/chapters. The Planning Dept. (headed by Liz Stead/new director) and Berk consultant (Lisa Grueter) are doing the presentations. Once these presentations are done, the intention is to get the Council to vote on it ASAP-sometime in early Oct.2024. The State does not require that it be voted on and finalized until Dec. 2024. The Planning Dept.claims it is out of funding and that is why they are rushing it through.

It is important for you to know about it because this new Comp Plan changes the Land Use, Zoning and Housing density and types in several locations for the Lake Burien Neighborhood. You don't know about this because the city failed to mail notice to the Lake Burien Shore Club about the draft documents they developed (draft Comp Plan and draft Environmental Impact Statement-EIS/SEPA statement-2024). Other Community Clubs were notified. We were not notified of a comment period for changes to the drafts and not notified when the hearing on these draft documents would be happening before the Planning Commission. Now that the drafts have passed the Planning Commission, you must make comments before the Council if you don't agree to what is happening to your neighborhood-before the Council takes the final vote.

The Growth Management(GMA) which requires Burien to have a Comp Plan and an EIS to support it, requires that resident participation happen in the development of the Comp Plan, the Plan is to be written in language that is understandable to the average citizen and that notification of land use changes, zoning changes, hearing dates be posted and made known to citizens affected. The GMA also requires that Critical Areas(that is Lake Burien lands) be protected first before on any land use and zoning changes are made in the Plan and on the City' Land Use Map. This is where you can find the current Land Use Map and Zoning Map- https://www.burienwa.gov/map_library. The expression is-The land speaks first. Lake Burien and its adjacent lands are also protected by the Shoreline Master Plan (SMP) another

Burien Master Plan document. All city documents must be internally consistent and consistent with each other. There is a question whether this draft Comp Plan is consistent with the SMP. Per the current Burien Comp Plan and Land Use Map(LU-1 Map) and the Zoning Map, all the Lake Burien Neighborhood is designated Residential Single Family(SF) Low Density-12,000'-4 housing units per acre. The sections of our neighborhood they are targeting will have significant increases in the number of units(increased density) that can be put on a one-acre lot and a change in the type of housing structures that can be put on the lot. What

affects one lot, affects all of us as we share a common body of water.

So where is the city seeking to change our neighborhood for land use and zoning development? There appear to be four areas they are targeting (the maps are not clearly marked); (a). the land from the NAVOS property south to the Greg Anderson, (b.) All of 152nd S.W., (c.) 20thSW and 21stSW down to the end of the Wiseman property and the church/school property and (d.) all the NAVOS/Ruth Dykeman/Multi Care property. The city claims it needs to make these changes to meet the expanded housing numbers that are being forced on them by the State and County.

NOT TRUE. While they are changing the Lake Burien Neighborhood lands to 15-40 units per acre and changing the NAVOS,etc, lands from Special Planning area 2-(lands for the housing and treatment of foster children) to Commercial/mixed use.-40 to 100 units per acre, they are decreasing the number of housing units per acre in the Gregory Heights Neighborhood to the Normandy Park boundary and decreasing the number of housing units per acre north of SW 152nd between SW 11th and SW 16th. Why this is happening is not explained as these are not Critical Areas.

Focus your attention on Chapter 2 of the Draft EIS, and the EIS statement.

Please see below the links to the requested documents.

- [Burien 2044 Comprehensive Plan \(January 2024 Draft\)](#)- for the strangely altered maps to create a new draft preferred Land Use Map paged 2-5,2-12, 2-13
- The new draft Land Use Map-called the Exhibit 1. Preferred Alternative can be found <https://burienwa.civicweb.net/document/198723/>, Agenda Item 11a., page 11 of 13
- Notice the changes to the Lake Burien Neighborhood from the current LU-1 Map at the four areas I mentioned. Notice that Gregory Heights Neighborhood has been changed from a SF Moderate Density to a SF Low Density RL-1 land use. It appears they changed them from 7,200' to 12,000' lots losing lots of potential land for housing unit development. Also, the lots on the north side of SW 152nd between SW 11th and 16th switched from Moderate SF 7,200 to SF Low Density 12,000 RL-1 again losing lots of potential land for housing unit development.
- [Burien 2044 Draft Environmental Impact Statement \(EIS\)](#)-see Fact Sheet, Distribution List, pages x,xi

[EIS Appendices](#)

Please call me if you have any questions. Perhaps the Leadership Team of the Lake Burien Shore Club should discuss next steps to protect the sections of the neighborhood that are experiencing these lands use and zoning changes. It appears that those of us being changed to the new RL-2 designations can have

15-40 units per acre-Zoning R3. Those of you staying at RL-1 can have 8-20 units per acre-R1 and R2 Zoning. The NAVOS property now changed to Commercial/ Mixed can have 40-100 units per acre. Zoning MU-1 MU-1 BP MU-2 MU-2 E MU-C

See <https://burienwa.civicweb.net/Portal/MeetingInformation.aspx?Id=4245> , agenda Item 11a , click on Presentations and Discussion, 12a Agenda bill, pages 27 of 88 and 28 of 88, Look at Exhibit 2-5 Land Use Designations to see the type of housing units can be put on your or your neighboring properties.

Please start asking questions about what they are doing to our neighborhood. Call the Planning Dept., write a letter to the Council, attend a Council meeting, call a Council member. Do it soon before the Council votes on this.

Liz Stead, Community Development Director 206-241-4647 planning@burienwa.gov

City Manager Adolfo Bailon adolfo@burienwa.gov

City Mayor Kevin Schilling kevins@burienwa.gov

Deputy Mayor Stephanie Mora stephaniem@burienwa.gov

Sincerely,

Bob and Chestine Edgar

12674shore@gmail.com

P.S. Jeff Watson and Alex Hunt no longer work for the Planning Dept.

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Wednesday, September 4, 2024 6:25 AM

To: Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Adolfo Bailon <AdolfoB@burienwa.gov>; Public - City Clerk <cityclerk@burienwa.gov>; Chaney Skadsen <ChaneyS@burienwa.gov>; Public - Planning <planning@burienwa.gov>; Jimmy Matta <jimmym@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>

Subject: CTTC - FW:

Subject -2044 Burien Comp Plan Draft EIS, 2044 Burien Draft Preferred Land Use Map, 2044 Draft Zoning, the Lake Burien Neighborhood and the Lake Burien Freshwater Shoreline

To the Burien City Clerk-Please put this letter in Comments to the Council and in the minutes for Council Meeting-Sept. 9, 2024. Please distribute this letter to the Burien Council members ASAP. Also, forward this letter to the members of the Planning Commission for their Set. 11, 2044 meeting. Thank you.

To the Burien City Council and the City Manager;

This letter is coming to you from me as a resident of the Lake Burien Neighborhood. It discusses; the 2044 Burien Comp Plan Draft EIS, 2044 Burien Draft Preferred Land Use Map, 2044 Draft Zoning, the Lake Burien Neighborhood, and the Lake Burien Freshwater Shoreline. The 2044 Burien Draft Comp. Plan and it proposed Zoning is now at box 4 of the Plan Development chart-Finalization and Adoption by the Council.

The problem being that this has happened without the Lake Burien Neighborhood, its Community Club and its residents being notified of the 2044 draft EIS, its comment timelines and process. It appears that the Lake Burien Neighborhood and its shoreline will be significantly impacted by the proposed changes discussed in EIS, the draft Preferred Comp Plan Land Use Map and draft preferred zoning.. Our neighborhood shares a very small water body environment and what impact one of our properties has an impact on all the neighbors and the environment.

Having contacted the City Council, City Manager, the COB Planning Dept. several times, I continue to have concern about the processes, procedures, accuracy of data that was

made available to the public and the past and current Planning Commission members, the rationale and justification that was used to create the visuals and the accuracy of what was created and provided by the consultant(s)-Berk, Makers, Pertweet-to guide the Planning Commission. The guidance that was used in decisions and recommendations to the Planning Commissioners and Council pertaining to creation of the 2024 draft preferred Alternative Land Use Map, the 2024 draft preferred Zoning tables and exhibits, and the 2044 Burien draft EIS discussions on the impacts of each of the alternatives and proposed mitigations for each preferred alternative. Additionally, there are some missing elements/errors from all the 3 alternative maps, readability problems, potential inconsistency problems with other city Master Plan documents and strange drafts of changes to 2044 Land Use Map and Zoning tables that don't coincide

with the Planning Dept.'s claim that the most logical way to meet its housing numbers and employment numbers was to pick and choose between the alternative maps 2 and 3; but the discussion of what was selected and deselected against between the alternative maps 2 and 3 that resulted in the 2044 Burien preferred draft Land Use Map and the rationale for those choices is missing from the 2024 Burien draft EIS statement discussion. It is not clearly explained to the reader of what elements were mixed and matched from these two maps to create the final 2044 Burien Preferred Land Use Map and the preferred Zoning tables/exhibits and why? LID(Low Impact Development) needs to be mandated for some Land Use and development allowed under this Comp Plan especially along the Ambaum and Boulevard Park corridors.

The 2044 draft EIS alternative maps are blurry, not clearly marked with sufficient streets labels and are difficult for the average resident to read and follow. Examples of these maps that are blurry, without clearly defined streets and incompletely labelled maps can be found on pgs., 1-8,1-11,1-13,1-15 of the 2044 Burien Draft EIS. Likewise, these poor maps are found in the 2044 Burien draft Comp Plan (Chapter 2 and Chapter 6, Heartland maps, 2023). The Heartland maps are unreadable. The draft EIS states that the final Preferred Land Use Map will be a mix and match of alternative maps 2 and 3, pg.1-17-but the final Preferred Map is not shown. What follows are questions posed of unresolved issues and impacts of each of the alternative maps 2 and 3, pg.1-18 to 1-22. The discussion on possible mitigations to resolve the impacts is very general and vague.

For both of the alternative maps 2 and 3, the draft EIS claims there will be no (land use & zoning) intensity development change in the shorelines-pgs. 1-21 and 1-22. However, the 2044 Burien draft preferred Land Use Map, 2044 draft preferred Zoning and proposed neighborhood land use intensity appears to show increased development in the Lake Burien shoreline (southside of SW 152nd, SW 20th and SW 11th as well as Planning Area 2). This is inconsistent with what was stated in the draft EIS. Additionally, one of those questions posed in the unresolved issues for Critical Areas is the lack of consistency for "best available science". The "best available science" standard and the "no net loss" standard is now required in the GMA/Comp Plan and for Critical Areas. The SMP (Shoreline Master Plan) requires that "best available science" be used in the shorelines and whatever /mitigation is used must result in "no net loss" or the impact is not to be allowed. The Lake Burien Neighborhood is/contains a freshwater shoreline and contains critical areas/wetlands. On pgs. 1-21 and pg.1-22 of the 2024 draft EIS it states that for both map alternatives 2 &3, development intensity avoids the shorelines. However, the draft 2044 Burien Preferred Land Use Map, the 2044 draft Zoning tables/exhibits and the alleged land development intensity shown on 2LU-3 Commercial nodes maps, pg.2-14 (which only shows node intensity) is implied to show increased land use intensity for the properties on the southside of SW 152nd up to SW 21st, SW 20th, the NAVOS special Planning Area 2 and SW 11th. This node map needs revision and correction. These areas of the Lake Burien Neighborhood (now shown as Residential Low 2 on the draft Land Use map)need to be changed on the 2044 preferred Land Use map as Residential Low 1 and likewise on the Zoning designation to RL-1.

Below are the draft document links I was sent to work with by the Planning Dept.

- [Burien 2044 Comprehensive Plan \(January 2024 Draft\)](#)
- [Burien 2044 Draft Environmental Impact Statement \(EIS\)](#)

- [EIS Appendices](#)
- [1 Draft Burien Comp Plan 2044 June 2024 PC tracks](#)

I am assuming based on the diagrams of the draft Comp Plan process that the Council is now works in the fourth square labelled.xxxxxx. pg.1 -4.This implies to me that the EIS has been now finalized, has been referred to the Council by the Planning Commission and now is moving on to the Council for finalization and a vote on the 2044 Burien draft Comp Plan, draft preferred Land Use Map and draft Zoning. This has happened without the Lake Burien Neighborhood being notified of the 2044 draft EIS, its comment timelines and process. Under the GMA(Growth Management Act), notice to the public and public participation in the development of the Comp Plan is a critical element.

General GMA rules for development of Comp. Plans are-(a) “the lands speaks” first meaning critical areas must be considered first before any other Land Uses are considered-likewise with the shorelines and critical areas, (b) the documents created for the Comp Plan must be in clear and readable form so that the average citizen can read and understand them, (c) allowing citizen participation is required (adequate access to the drafts and final draft documents and notice of public hearing) must be posted and sent to interested parties, govt. agencies, tribes-typically the media source(s) notice was posted in such as- • The Seattle Times • The Daily Journal of Commerce are listed in the Distribution List (d) adequate review and comment time must be provided to the public- a noticing and Participation Plan must be made by the city. The Lake Burien Shore Club(Community Club) and Neighborhood was not posted on the draft EIS Distribution List and they/ did not receive notice off the draft EIS/SEPA statement or of the comment period. Additionally, the Highline Times has not been an operating newspaper for years now and is not considered a local media posting for residents. A major problem/ that appears to have occurred is that both the Consultant(Berk, et al) and Planning Dept. Staff did not recognize the Lake Burien Neighborhood as a separate and unique neighborhood from the Seahurst Neighborhood and the Gregory Heights neighborhood. Likewise, it did/does not recognize the Lake Burien Neighborhood as a shoreline of the city and State. While the city does not have a specific map in its Map Library for Burien Neighborhoods, the Lake Burien Neighborhood was added to the city’s Comp Plan and Land Use Map and its Zoning Map for the specific protect of the sensitive freshwater Shoreline and the Critical Areas/wetlands around the lake-Ordinance 614, 2014. The Lake Burien Shore Club has been known to the city as a community club of interest for years. And yet why was it missed on the Distribution List for the draft EIS? The 2024 Burien draft EIS and 2024 Burien draft Comp Plan and draft zoning changes only recognizes the Burien Marine Shorelines and not the Burien Freshwater Shoreline . For some unknown reason, the 2024 Burien draft EIS refers to Lake Burien as an open area space and parkland. It is neither. The draft EIS fails to identify the Lake Burien Freshwater Shoreline and the 2044 Burien draft Comp Plan, Chapter 8,pg.8-3 fails to identify the Lake Burien Freshwater Shoreline. The changes being made to Lake Burien Neighborhood in the previous two draft documents are not needed to meet the housing units or employment numbers for the city for 2044. The alternative maps 2 and 3 show that those numbers can be met by increasing the density, zoning, and land use intensity in other neighborhoods(Gregory Heights, Seahurst, the Urban Core) and other parts of the city. These neighborhood areas of the city do are not shorelines of the city and state and do not have concentrated critical areas in them as occur around Lake Burien. Why is the Lake Burien shoreline being impacted contrary to the discussions about how the preferred alternative Land Use Map and Zoning are to be developed from mixing and matching alternative maps 2 and 3?

Under the protection of the SMP(Shoreline Master Plan), there are two guiding principles that must be met when changes in Land Use, Land use intensity and Zoning are being considered;

(a) Best available science must be used and (b) whatever change and mitigation are required (due to impacts) or considered they must meet the test of “no net loss” to the shoreline. In the discussions relating to changes to the land use and zoning; if an impact cannot be mitigated so that there is “no net loss”- using best available science standards- then the change is to be avoided or not allowed. This is also a standard for Critical Areas in the Comp Plan and GMA . The SMP is not a sub-servant arm to the Comp Plan or the Zoning plan-as suggested in the 2024 Burien draft EIS. It has equal authority and power as the Comp Plan. All Master plans in the city must be internally consistent and consistent with/across all the other city Master plans, etc. Inconsistencies are not allowed. A land use change or zoning change that involves the SMP shorelines requires an update change to the SMP. The draft EIS states that there will be no changes to the SMP at this time.

(b) This 2044 Burien draft EIS document claims there will be no changes to the shorelines. However, it appears that there will be land use changes, zoning changes and intensity changes to the Lake Burien

Neighborhood and shoreline in at least four locations on the draft map 2 and one location on draft map 3. It appears these changes may create an inconsistency with the current Burien SMP.

These changes appear to not have been tested for or analyzed against “best available science and may result in “net loss” to the Lake Burien shoreline or analyzed for consistency with the Burien

SMP Master Plan.

(c) Anytime a Land Use Change and Zoning Change alters the Land Use, Land Use Intensity and Zoning for a shoreline from four units per acre to 15 to 40 units per acre (which is happening in

this 2044 Burien draft preferred Land Use Map and respective Burien draft Zoning tables/exhibits) there stands a very strong likelihood of potential “net loss” to the shoreline

especially when the “best available” science is not discussed in the EIS draft. Certainly, increased lot coverage, increased amounts of impervious surface allowed to

support these new densities and housing types will have an impact on the shoreline that may result in “net loss”. The Lake Burien Neighborhood has had historical problems with stormwater

management as well as flooding when rains comes very heavy and fast into the Miller Creek Basin. The Lake Burien Neighborhood submitted documentation to the city during the SMP

development and Comp Plan amendment process in 2014 on these issues.

(d) While the Planning Commission was working on developing the 2044 Burien draft Land Use Map and respective draft Zoning tables/exhibits, the Consultant(s)-Berk, et.al-

developed an unofficial, interactive city map showing numerous features in the city so the Commissioners could understand where and what things and places were in the city.

These interactive, overlay working maps of the current Comp Plan failed to identify the Lake Burien Neighborhood as a shoreline and having critical areas/wetlands. These map

omissions may have resulted in the Commissioners drawing false conclusions (in developing the draft preferred Land Use Map and Zoning exhibits relating to units per acre) and thus

neglecting the sensitive and fragile character of this neighborhood/shoreline and its critical areas and its need for a low land use designation and low density development.

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The City and the Planning Department and Planning Commissioners and perhaps even Council members seem to have a confused view of what is the nature of the Ruth Dykeman/NAVOS/Multi Care- Planning Area 2. That area has existed for approx. 100 yrs. as the site of transitional housing for children who are wards of the State of Washington. More recently, the State of Washington funded additional housing for young adults exiting the state foster care system- Independence Bridge-to help these young adults to acquire the skills to live independently rather than just joining the ranks of the homeless in the State. This has never been a commercial/ mixed use land use. It appears NAVOS/Multi Care was not noticed of the 2044 Burien draft EIS comment period or even of the existence of the documents, changes to their Land Use Map status or of their draft Zoning status. They are not shown on the Distribution List. They have long been a party of interest relating to the Lake Burien Neighborhood and shoreline. Why weren't they noticed about a draft Land Use Change or draft Zoning change resulting from this draft Comp Plan or draft EIS for the Plan?

Action Requested For Changes - I am requesting that changes be made to; this 2044 Burien draft Comp Plan for the Lake Burien Neighborhood on the Land Use Map, intensity use, Zoning designations and regulations be adjusted (when developed per the posted tables) and on the developed Zoning map and an adjustment in the 2044 draft Comp Plan text language describing and designating the Lake Burien Neighborhood and the Lake Burien Shoreline. That a map change and adjustment be made for what is currently Planning Area 2. This area has never been commercial or commercial mixed in use to the best of my knowledge. The draft preferred alternative Land Use map & draft Plan text for what is currently Planning Area 2 should add language recognizing the historical importance of this area and the long-term use of the site for Foster children's care and treatment, Transitional housing for foster children and services to families and children in crisis-for close to 100 yrs. It was designated by Judge Dykeman to the community for that specific purpose. There continues to be a current and urgent need for this kind of land use and housing for children and families into the future. Its current use is far more urgent, critical and vital to the community than commercial condos, elite restaurant locations or for-profit recreation facilities. That a map be added to the draft Plan showing land use intensity as well as and relating to the commercial node intensity map. That the draft Plan's Stormwater map be show the correct no. and locations of the stormwater outlets into the lake. And that the flooding and climate change problems to the lake, its wetlands, shoreline and the surrounding residents face be discussed in the draft. That the draft maps shown for SW 20th and 21st be corrected for the school and church and the sidewalking and curbing remain only on the north side of 152nd from SW 11th to the west side of SW 20th. That all maps, tables and exhibits included in the draft Plan be clear, labelled, and readable to the average citizen. That the Lake Burien Shore Club/Community club be added to the notice/ distribution list for this 2044 Burien draft Comp Plan and any other draft EIS or SEPA decisions related to this draft Plan or revised EIS. That Dr. R. Edgar and Dr. C. Edgar also be added to the Distribution List. And that any other comments and requests made by other members of the Lake Burien Shore Club be noted and considered

by the Planning Commission to be recommended to the Council before the 2044 plan is finalized or voted on by the Council.

Further, the Highline Times no longer exists as a separate media source. I encourage the city to change its Distribution List for Planning Dept. publications and city public notices.

Please note that a major Metro bus line corridor does not exist on the north side of SW 152nd St. starting from SW 11th and going to SW 21st. There is a very short shuttle bus line 631 that runs through the Gregory Heights neighborhood and takes people to the hospital. All of the bus stops that were once along north SW 152nd no longer receive service.

That the Land Use and Zoning changes that appears to have happened to the Gregory Heights Neighborhood up to the Normandy Park Boundary and the changes to the Seahurst Neighborhood from SW 12th to SW 16th north to Seahurst Elementary(in this draft as displayed on the draft Land Use Map and Zoning tables/exhibits) be reevaluated by the Commission and Council, if the city is under extreme pressure to provide adequate land for housing development, density and employment to meet its growth numbers.

Please pass these comments on to Liz Stead and to members of the Planning Commission. Thank you.

If you have any questions, please contact me.

Respectfully,

Dr. C. Edgar

P.S. Why was this called the 2044 Burien Comp Plan? Usually Comp Plans are named by the year they were adopted in.

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Thursday, September 12, 2024 8:19 AM
To: Lisa Grueter <Lisa@berkconsulting.com>
Cc: 'chestine edgar' <12674shore@gmail.com>
Subject:

Lisa Grueter, AICP is a Principal at BERK focus on land use planning. Her phone number is 206-324-8760 and email is lisa@berkconsulting.com

To Berk Consulting/Lisa Grueter;

I attended the Burien Planning Commission meeting, 9/11/2024 hoping that you might possibly be in attendance. As you were not there, we are forwarding along this letter that we sent on the Planning Commission, Planning Department and City Council. We are requesting that you pass the information contained in the letter to the other consultants (Makers, Otak Inc , etc.) on this 2044 Burien Comp Plan and Zoning Map, tables and exhibits project.

As residents of the Lake Burien Neighborhood, we noticed errors relating to our neighborhood in the research, data, maps, and texts posted about our neighborhood in this 2044 draft Comp Plan, related draft documents and DEIS. It remains unclear how we were missed as a Shoreline of the State and as protected by the Burien SMP. These 2044 draft documents claim that there will be no changes to the Burien Shorelines and yet our neighborhood clearly shows land use, maps, zoning, and density changes occurring to it but not to the Marine Shorelines. It also appears that the critical areas around the lake were also missed on the working interactive maps used by the Planning Commission. These errors about our neighborhood and lands are repeated throughout the 2044 draft Comp Plan, the 2024 draft Land Use Map, the 2024 draft EIS and the proposed 2024 draft Zoning. The resulting 2044 draft documents, draft maps, draft EIS/SEPA statement appear to be inconsistent with the current Burien SMP.

In speaking with the Washington State Dept. of Ecology, it appears the errors will need to be reviewed by you and will need to be corrected before the 2044 draft Comp Plan, 2044 draft FEIS, 2044 draft zoning and supporting reports relating impacts and mitigation are presented to the City Council for final review, discussion and vote/approval. It is unclear to us whether this will be done before the next final hearing on these documents. Also, it appears that Berk was the agent who created the Distribution List for the DEIS. For that reason, we are requesting the Berk or the City put us (as individuals) and the Lake Burien Shore Club/Community Club (LBSC) on the notice list for the final draft review(s) and Public Hearing(s). We want to be made aware of when Public Comments can be put on the public record for this 2044 Comp Plan, 2044 Comp Plan Land Use Map, 2044 Zoning Map, tables and exhibits and the 2044 draft FEIS. If you need mailing addresses or have questions, please feel free to contact me at the posted email address on this letter.

At the 9/11/2044, I made comments before the Planning Commission about this situation.

Thank you for your attention to this letter.

Respectfully,

Dr. C. Edgar and Dr. R. Edgar

P.S. Between SW 152nd and SW 20th and SW 21st there is a hot pink rectangle that designates those properties as Commercial Mixed Use. They have never been Commercial Mixed Use in use. In real life, this property is the St. Frances Elementary School, Gymnasium, Playfield, Parking Lot, related offices, pastor's residence and Church. The church, school, playfields, residence and parking lots are heavily used seven days a week and have been in existence since the 1960s. To provide a more realistic projection of future land and zoning use for the next 20 years, the public would be better served by flipping that hot pink rectangle to the westside of SW 21st where there is land and zoning available for future development in the next 20 years.

Letter to the City and Council-

Please see the correction- "The Highline Times no longer functions as a newspaper."

Dr. C. Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Sunday, September 8, 2024 11:05 PM

To: kevins@burienwa.gov; stephaniem@burienwa.gov; 'Council member-Linda Akey-'

<lindaa@burienwa.gov>; jimmym@burienwa.gov; council@burienwa.gov; CityClerk@burienwa.gov;

'Adolfo Bailon' <adolfo@burienwa.gov>; planning@burienwa.gov

Cc: 'Garmon Newsom II' <GarmonN@burienwa.gov>

Subject:

To the Burien City Clerk-Please place this letter in Comments to the Council and in the minutes for the Sept.9, 2024 Council meeting.

Also, Please forward this to the members of the Council ASAP for the Sept. 9, 2024 meeting and to the Planning Commission (PC) for their

next scheduled PC meeting.

Thank you.

To the City Council and City Manager;

I attempted to go to the Planning Commission Meeting that had been scheduled for Sept. 4, 2024, but when I got there, I was told the

meeting was cancelled due to a lack of a quorum. I wanted to share my last two letters to them about my concerns relating to the 2024 draft

Comp Plan and the 2024 draft EIS and about zoning. I also want to share the contents of this letter with them for their Sept. 11, PC meeting.

Additionally, I requested some information from the Planning Dept. regarding the 2024 Burien draft Comp Plan and the draft Zoning document.

I have not received a response as of yet. However, some of my neighbors of the Lake Burien community club did get a response back from the

Planning Dept. as did the Council receive it too.. So, the Council has the letter that the below comments of this letter discuss.

My comments are being made with respect to the letter the LBSC/Community Club received back from Liz Stead

and that was titled LBSC Response Liz Stead.docx

1. The comments that Liz Stead made in her response are very general and didn't specifically answer the LBSC questions.

2. The Seattle Times serves the City of Seattle but is generally insignificant to Burien readers. The Highline Times no longer exists.

The City of Burien needs to get a new notice posting source here in the city because Burien residents don't have a reliable media

source they are receiving notice from. The city website is difficult to negotiate and to immediately see what is being noticed.

My suggestion is that time sensitive, public notices immediately pop up on the front page of the city home page. Blogs and other gossip

source pages notice are not always reliable information sources.

3. Just because the city made an error and forgot to mention the Lake Burien shorelines in its 2044 draft Comp Plan and its draft EIS,

that is not a reasonable excuse for not correcting it now. The City of Burien did not have a SMP of its own until 2013. Perhaps, that

is why it was missing from the previous Comp Plan when the consultant and the Planning Dept. looked at it. Correct the error now.

Cities are required to update their Comprehensive Plans on a regular basis. The objective is to respond to actual changes in

conditions and requirements as well as to create the appearance that local governments are actually doing something.

4. We are asking that the city correct the draft Land Use Map for the Lake Burien Neighborhood and that all of the land to the southside of

SW 152nd, along the east(11th)side and west(20th) sides of the neighborhood be changed on the draft Land Use Map and draft Zoning

Map and tables to be consistent with the south side of the Lake Burien Neighborhood to show the neighborhood as RL-1 Land Use and R-1 zoning.

The Lake Burien Neighborhood lot sizes remaining at 12,000'. Correct the colors on the maps to reflect changes. If the city refuses to correct the maps and

Zoning then a box with an arrow be placed on these maps and tables stating that Lake Burien is a shoreline and is governed by the SMP.

Really, it doesn't matter what colors are the city puts on its maps because the SMP and the Critical Areas Ordinance override any other

Comp Plan general Land Use or Zoning charts developed by the city. The colors currently on the maps just serve to confuse the reader

about the Lake Burien Neighborhood/Shoreline of the State. The document(s) in the Sept. 9, 2024 Council agenda packet are poorly organized,

confusing, and include simple technical errors etc. Whatever final documents are approved and adopted for this new Comp Plan, new Land Use Map,

and new Zoning exhibits, they should be clear, accurate, informative, and easy for the average citizen to read and follow.

5. I cannot understand why the Planning Commission proposed to change the land use on the northside of the Lake Burien Neighborhood to RL-2

and rezone the majority of the homes on the north side of Lake Burien to R-3 rather than R-1. It seems to me that existing conditions

on the north side(southside of SW 152nd) of the lake are comparable to the south side of the Lake and that the entire Lake Burien

Neighborhood area enjoys equal protection from the SMP and the Critical Areas Ordinance(CAO).

I think these changes made to the land use and zoning for the Lake Burien Neighborhood were either a flat-out mistake or else a

simple political maneuver without any real teeth given the SMP.

As residents of the Lake Burien Neighborhood/Shoreline of the State, we are asking politely that the city correct their errors before the draft

2044 draft Comp Plan and 2024 draft Zoning exhibits are voted on and approved by the Council. This is a very simple situation to correct and the last

thing we need to do is to involve more lawyers in it. This is the portion of the Comp Plan legislative process where the Council raises the questions,

examines the data and facts, and requests the changes before the Comp Plan text, Comp Plan Land Use Map and Zoning exhibits are finalized and

voted on. We would appreciate your attention to these details.

Respectfully,

Dr. C. Edgar and Dr. R. Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Monday, September 16, 2024 10:08 AM

To: Adolfo Bailon <AdolfoB@burienwa.gov>; Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Linda Akey <LindaA@burienwa.gov>; Jimmy Matta <jimmym@burienwa.gov>; Public - Planning <planning@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>; Public - City Clerk <cityclerk@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>

Cc: Garmon Newsom II <GarmonN@burienwa.gov>

Subject: CTTC - FW:

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

To the City Clerk-Please place this in correspondence to the Council for Sept. 16, 2024 and send it to the Council as soon as possible. Please place this in minutes to the Sept. 23, 2024 meeting

To the Burien City Council and City Manager;

We know how busy you are and how long these Comp Plan, Zoning documents and EIS documents are. So, we wanted to provide you with adequate lead time to read our concerns.

In the email string below you will find letters that we have sent to the Burien Planning Dept., the Berk Consultants and have forwarded on the Burien Planning Commission. These exchanges relate to the Lake Burien Neighborhood and the development of the 2044 Draft Burien Comp Plan, its draft land use maps, draft zoning map(s) and exhibits and draft EIS.

These are the links that were provided to us by the Planning Dept. to do our research and created our responses

[Burien 2044 Comprehensive Plan \(January 2024 Draft\)](#)

[Burien 2044 Draft Environmental Impact Statement \(EIS\)](#)

[EIS Appendices](#)

[1 Draft Burien Comp Plan 2044 June 2024 PC tracks](#)

In our email letter to Lisa Grueter and the Planning Dept. dated Sept.14, 2024, we listed our sections (by pg. no.) in the draft Comp Plan that need correction for the Lake

Burien Neighborhood where the Lake Burien Neighborhood is not correctly identified as a Burien Shoreline or a Shoreline of the State. As we mentioned in that email, after speaking with the Dept. of Ecology (DOE), the draft Comp Plan will need to be corrected. Likewise, the 2044 Preferred Land Use Map will need to have color code corrections to show all of the Lake Burien Neighborhood as all the same color(light yellow excepting the NAVOS property/ Special Planning 2) representing the neighborhood as Residential Low 1. The 2024 Draft Zoning Map and zoning exhibit charts and tables will need to show the Lake Burien Neighborhood as R-1.

As to corrections of the 2044 Draft EIS;

At [1.6.1.2](#), pg 1-18, line 2-will need to read-"High growth potential is not indicated for the marine shorelines and not for the Lake Burien freshwater shorelines".

This change refers to discussions about both Alternatives 2 and 3 maps.

At [1.6.1.3](#),pg. 1-22-The statement" Both Alternatives 2 and 3 state"... development intensity avoids the shorelines". That means that the Lake Burien Neighborhood Shorelines will also be low intensity in development too.

Chapter 2, Exhibit 2.3.11, pg. 2-20- the Lake Burien Neighborhood should be changed to Residential Low 1 and Zoning R-1. Colors in the key to reflect that change.

Chapter 3, Natural Environment, pg. 3-2, Add and identify" ... Lake Burien as a freshwater shoreline in Burien".

Additionally in 2013 during the development of the Burien SMP, the Lake Burien Neighborhood had 11 stormwater outlets into the lake- Burien SMP, Data Analysis Report, March, 2010, Pg. 1. However under current draft Stormwater, pg. 1-47, 1-48, the Stormwater Map now only shows 7 stormwater outlets into the lake. Having met with Dan O'Brien, he was unable to identify what has happened to the other 4 outlets since that time. Those outlets are critical to managing flooding on lands around the lake. There should be an effort made to correct this Stormwater map as some houses in the neighborhood still experience flooding and have sump pumps running during rains to prevent flooding.

Lastly, there is a document that was developed as a 2023 Staff Report that we have never seen a presentation on. This document relates to changing the size of all single residential lots in the city from residential low density, 12,000'-4 units per acre to 6,000'-8-15 units per acre and 15-40 units per acre and single family moderate density lots 7,500' to 5,000' and 3,000' lots (R-4, R-5) ?-? to units per acre. This seems to be a very significant change without some clear presentation to homeowners about what is going to happen to their property, housing types that will be allowed for each of these lot sizes and how that will be handled with the King County Assessor and the implications for potential property tax increases. Also, how will this impact lot size coverage, setbacks, imperious surface allowed, adequate infrastructures such as sewers, etc. and adequate off-street parking so that the residential roads don't become the congested mess as can be seen in West Seattle with the High Point Development?-15-26 units per acre and only a single car at a time can get through many streets.

Better Public Explanation needed-

Law Summary of Requirements Related Burien Documents Middle Housing Bill – E2SHB 1110 Middle housing types included in the new state law are duplexes up to sixplexes, Middle Housing 2023 Staff Report: <https://connect.burienwa.gov/wpcontent/uploads/2023/08/June-2023-MiddleHousing-Staff-Report.pdf> Staff Report Attachments: <https://connect.burienwa.gov/wpcontent/uploads/2023/08/June-2023-MiddleHousing-Staff-Report-Attachments.pdf> [1]: that must be allowed per lot in predominately residential zones. [2]: Minimum number of middle housing units that must be allowed per lot within ¼ mile walking distance of major transit stop in predominately residential zones. [3]: Minimum number of middle housing units that must be allowed per lot with affordable housing in predominately residential zones where density in applicable zone does not otherwise allow this number.

Thank you for your attention to the corrections that need to be made relating to the 2044 Draft Burien Comp Plan text, Land Use and Zoning Maps and exhibits and the Draft EIS before the Council have its discussion and vote on this Plan.

Respectfully,
Dr. C. Edgar and Dr. R. Edgar

12674shore@gmail.com <12674shore@gmail.com>

Sent: Saturday, September 14, 2024 9:12 PM

To: 'Lisa Grueter' <Lisa@berkconsulting.com>

Cc: 'chestine edgar' <12674shore@gmail.com>

Subject: FW:

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Friday, September 13, 2024 8:39 AM

To: 'Chaney Skadsen' <chaney@burienwa.gov>; 'Liz Stead' <LizS@burienwa.gov>

Cc: 'Adolfo Bailon' <adolfo@burienwa.gov>

Subject: FW:

Hi Lisa Grueter/Berk;

Thank you for your response.

We did go to Chapter 8 of the draft June, 2024 draft Comp Plan. On pg.8-2(Introduction),it mentions that Burien has shoreline lands along Puget Sound-no mention of shorelines along Lake Burien as freshwater shoreline.

On pg.8-3, it discusses Shoreline Habitat and again mentions shorelines along Puget Sound-again no mention of shorelines along Lake Burien.

On pg.8-5, Exhibit 8-1 Critical Areas Map (I enlarged this map 400%) and I still could not clearly see shorelines designated around Lake Burien.

Also, I would like to note that in going over the DEIS from Jan.2024, I saw the shoreline habitat discussed and saw the Puget Sound shorelines discussed.

Lake Burien shoreline was not discussed.

In the DEIS, it is mentioned that there will be no changes to the Burien shorelines, but you have not mentioned the Lake Burien Shoreline in this document.

Please refer me to the location in the draft June, 2024 or the DEIS, Jan. 2024 where the Lake Burien shorelines are mentioned. Perhaps we are talking about two different draft versions of the Burien Comp Plan ?

Otherwise, we are requesting that you correct these documents to reflect the Lake Burien Freshwater Shoreline as protected under the SMP.

I am copying this email to the city staff.

Respectfully,

Dr. C. Edgar and Dr. R. Edgar

From: Lisa Grueter <Lisa@berkconsulting.com>
Sent: Thursday, September 12, 2024 4:53 PM
To: 12674shore@gmail.com
Cc: Chaney Skadsen <chaney.s@burienwa.gov>; Liz Stead <LizS@burienwa.gov>
Subject: RE:

Thank you for your email,

I'm copying City staff too as the City manages the public comment for the project.

The Shoreline designations are not found on the City's Land Use or Zoning map where you may have been looking for it. The draft Sustainability & Natural Environment Chapter of the Comprehensive Plan address Shorelines and reflect the shoreline designations on Exhibit 8-1. Critical Areas Map.

Note that Lake Burien contains a shoreline designation. For more information about how the Shoreline Management Program will be applied on a project-by-project basis please see the Burien Municipal Code (BMC) Title 20.

Lisa Grueter, AICP
206.493.2367 | [DIRECT](mailto:Lisa@berkconsulting.com)
www.berkconsulting.com


STRATEGY | ANALYSIS | COMMUNICATIONS
Helping Communities and Organizations Create Their Best Futures

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Thursday, September 12, 2024 8:19 AM
To: Lisa Grueter <Lisa@berkconsulting.com>
Cc: 'chestine edgar' <12674shore@gmail.com>
Subject:

Lisa Grueter, AICP is a Principal at BERK focus on land use planning. Her phone number is **206-324-8760** and email is lisa@berkconsulting.com

To Berk Consulting/Lisa Grueter;

I attended the Burien Planning Commission meeting, 9/11/2024 hoping that you might possibly be in attendance. As you were not there, we are forwarding along this letter that we sent on the Planning Commission, Planning Department and City Council. We are requesting that you pass the information contained in the letter to the other consultants (Makers, Otak Inc , etc.) on this 2044 Burien Comp Plan and Zoning Map, tables and exhibits project.

As residents of the Lake Burien Neighborhood, we noticed errors relating to our neighborhood in the research, data, maps, and texts posted about our neighborhood in this 2044 draft Comp Plan, related draft documents and DEIS. It remains unclear how we were missed as a Shoreline of the

State and as protected by the Burien SMP. These 2044 draft documents claim that there will be no changes to the Burien Shorelines and yet our neighborhood clearly shows land use, maps, zoning, and density changes occurring to it but not to the Marine Shorelines. It also appears that the critical areas around the lake were also missed on the working interactive maps used by the Planning Commission. These errors about our neighborhood and lands are repeated throughout the 2044 draft Comp Plan, the 2044 draft Land Use Map, the 2044 draft EIS and the proposed 2044 draft Zoning. The resulting 2044 draft documents, draft maps, draft EIS/SEPA statement appear to be inconsistent with the current Burien SMP.

In speaking with the Washington State Dept. of Ecology, it appears the errors will need to be reviewed by you and will need to be corrected before the 2044 draft Comp Plan, 2044 draft FEIS, 2044 draft zoning and supporting reports relating impacts and mitigation are presented to the City Council for final review, discussion and vote/approval. It is unclear to us whether this will be done before the next final hearing on these documents. Also, it appears that Berk was the agent who created the Distribution List for the DEIS. For that reason, we are requesting the Berk or the City put us (as individuals) and the Lake Burien Shore Club/Community Club (LBSC) on the notice list for the final draft review(s) and Public Hearing(s). We want to be made aware of when Public Comments can be put on the public record for this 2044 Comp Plan, 2044 Comp Plan Land Use Map, 2044 Zoning Map, tables and exhibits and the 2044 draft FEIS. If you need mailing addresses or have questions, please feel free to contact me at the posted email address on this letter.

At the 9/11/2044, I made comments before the Planning Commission about this situation.

Thank you for your attention to this letter.

Respectfully,
Dr. C. Edgar and Dr. R. Edgar

P.S. Between SW 152nd and SW 20th and SW 21st there is a hot pink rectangle that designates those properties as Commercial Mixed Use. They have never been Commercial Mixed Use in use. In real life, this property is the St. Frances Elementary School, Gymnasium, Playfield, Parking Lot, related offices, pastor's residence and Church. The church, school, playfields, residence and parking lots are heavily used seven days a week and have been in existence since the 1960s. To provide a more realistic projection of future land and zoning use for the next 20 years, the public would be better served by flipping that hot pink rectangle to the westside of SW 21st where there is land and zoning available for future development in the next 20 years.

Letter to the City and Council-

Please see the correction- "The Highline Times no longer functions as a newspaper."
Dr. C. Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Sunday, September 8, 2024 11:05 PM

To: kevins@burienwa.gov; stephaniem@burienwa.gov; 'Council member-Linda Akey-' <lindaa@burienwa.gov>; jimmym@burienwa.gov; council@burienwa.gov; CityClerk@burienwa.gov; 'Adolfo Bailon'

<adolfofob@burienwa.gov>; planning@burienwa.gov
Cc: 'Garmon Newsom II' <GarmonN@burienwa.gov>
Subject:

To the Burien City Clerk-Please place this letter in Comments to the Council and in the minutes for the Sept.9, 2024 Council meeting.

Also, Please forward this to the members of the Council ASAP for the Sept. 9, 2024 meeting and to the Planning Commission (PC) for their next scheduled PC meeting.

Thank you.

To the City Council and City Manager;

I attempted to go to the Planning Commission Meeting that had been scheduled for Sept. 4, 2024, but when I got there, I was told the meeting was cancelled due to a lack of a quorum. I wanted to share my last two letters to them about my concerns relating to the 2024 draft Comp Plan and the 2024 draft EIS and about zoning. I also want to share the contents of this letter with them for their Sept. 11, PC meeting.

Additionally, I requested some information from the Planning Dept. regarding the 2024 Burien draft Comp Plan and the draft Zoning document.

I have not received a response as of yet. However, some of my neighbors of the Lake Burien community club did get a response back from the Planning Dept. as did the Council receive it too.. So, the Council has the letter that the below comments of this letter discuss.

My comments are being made with respect to the letter the LBSC/Community Club received back from Liz Stead and that was titled LBSC Response Liz Stead.docx

1. The comments that Liz Stead made in her response are very general and didn't specifically answer the LBSC questions.

2.The Seattle Times serves the City of Seattle but is generally insignificant to Burien readers. The Highline Times no longer exists.

The City of Burien needs to get a new notice posting source here in the city because Burien residents don't have a reliable media

source they are receiving notice from. The city website is difficult to negotiate and to immediately see what is being noticed.

My suggestion is that time sensitive, public notices immediately pop up on the front page of the city home page. Blogs and other gossip

source pages notice are not always reliable information sources.

3. Just because the city made an error and forgot to mention the Lake Burien shorelines in its 2044 draft Comp Plan and its draft EIS,

that is not a reasonable excuse for not correcting it now. The City of Burien did not have a SMP of its own until 2013. Perhaps, that

is why it was missing from the previous Comp Plan when the consultant and the Planning Dept. looked at it. Correct the error now.

Cities are required to update their Comprehensive Plans on a regular basis. The objective is to respond to actual changes in

conditions and requirements as well as to create the appearance that local governments are actually doing something.

4. We are asking that the city correct the draft Land Use Map for the Lake Burien Neighborhood and that all of the land to the southside of

SW 152nd, along the east(11th)side and west(20th) sides of the neighborhood be changed on the draft Land Use Map and draft Zoning

Map and tables to be consistent with the south side of the Lake Burien Neighborhood to show the neighborhood as RL-1 Land Use and R-1 zoning.

The Lake Burien Neighborhood lot sizes remaining at 12,000'. Correct the colors on the maps to reflect changes. If the city refuses to correct the maps and

Zoning then a box with an arrow be placed on these maps and tables stating that Lake Burien is a shoreline and is governed by the SMP.

Really, it doesn't matter what colors are the city puts on its maps because the SMP and the Critical Areas Ordinance override any other

Comp Plan general Land Use or Zoning charts developed by the city. The colors currently on the maps just serve to confuse the reader

about the Lake Burien Neighborhood/Shoreline of the State. The document(s) in the Sept. 9, 2024 Council agenda packet are poorly organized,

confusing, and include simple technical errors etc. Whatever final documents are approved and adopted for this new Comp Plan, new Land Use Map,

and new Zoning exhibits, they should be clear, accurate, informative, and easy for the average citizen to read and follow.

5. I cannot understand why the Planning Commission proposed to change the land use on the northside of the Lake Burien Neighborhood to RL-2

and rezone the majority of the homes on the north side of Lake Burien to R-3 rather than R-

1. It seems to me that existing conditions

on the north side(southside of SW 152nd) of the lake are comparable to the south side of the Lake and that the entire Lake Burien

Neighborhood area enjoys equal protection from the SMP and the Critical Areas Ordinance(CAO).

I think these changes made to the land use and zoning for the Lake Burien Neighborhood were either a flat-out mistake or else a

simple political maneuver without any real teeth given the SMP.

As residents of the Lake Burien Neighborhood/Shoreline of the State, we are asking politely that the city correct their errors before the draft

2044 draft Comp Plan and 2024 draft Zoning exhibits are voted on and approved by the Council.

This is a very simple situation to correct and the last

thing we need to do is to involve more lawyers in it. This is the portion of the Comp Plan legislative process where the Council raises the questions,

examines the data and facts, and requests the changes before the Comp Plan text, Comp Plan Land Use Map and Zoning exhibits are finalized and voted on. We would appreciate your attention to these details.

Respectfully,

Dr. C. Edgar and Dr. R. Edgar

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Monday, September 23, 2024 11:08 AM

To: CityClerk@burienwa.gov; 'Adolfo Bailon' <adolfo@burienwa.gov>; planning@burienwa.gov; stephaniem@burienwa.gov; 'To:' <kevins@burienwa.gov>; 'Council member-Linda Akey-'

<lindaa@burienwa.gov>; jimmym@burienwa.gov; council@burienwa.gov; planning@burienwa.gov

Cc: 'Cc: 'Garmon Newsom II' <GarmonN@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>; planningcommission@burienwa.gov

Subject: FW: Corrections to the 2044 draft Burien Comp Plan and associated documents

Topic- Comments on Corrections to the 2044 draft Burien Comp Plan and associated documents

From: Chestine Edgar <chestine.edgar@wingroups.org>

Sent: Sunday, September 22, 2024 8:14 PM

To: chestine edgar <12674shore@gmail.com>

Subject:

To the Burien City Clerk-Please put this email for the Sept. 23, 2024 Burien City Council meeting in Comments to the Council. Please place this in the minutes to the Council Meeting for the Sept. 23, 2024 meeting also. Distribute this letter to Council members ASAP. Thank you.

Dr. C. Edgar and Dr. R. Edgar

To the Burien City Council and the City Manager;

Once again, we are writing to you about the persistent errors in the 2044 draft Burien Comp Plan Text, the 2044 draft Burien Land Use Map, the draft posted land use intensity and the 2044draft Burien EIS.

1.It appears now that the 2044 draft Burien Zoning map has been corrected for the NAVOS property returning it back to a Special Planning Area 2. See the Agenda Item 12c, Exhibit 10. Planning Commission Preferred Zoning – July 3, 2024 from the Sept.9, 2024 memo reference, pg. 15 of 104. Thank you.

2. However, it remains unclear what you are doing with the Lake Burien Neighborhood on Land Use Map for the Lake Burien Neighborhood properties along SW 20th and SW 21st, along SW 11th and on the southside of SW 152nd. All of these lots and lands are covered by the Shoreline Master Plan (SMP) and as such should not be showing a Land Use change from their current land use which is Residential Lowest Land Use. Translated on to you new land use designations this means they should be Residential Low 1, light yellow in color just like the properties on the southside of the Lake Burien Neighborhood. However, the Consultants Berk and Makers have placed these lands(Lake Burien Neighborhood properties along SW 20th and SW 21st, along SW 11th and on the southside of SW 152nd) on the 2044 draft preferred Burien Land Map as orange color-standing for Residential Low 2. This is clearly an error and needs

correction that still have not been made on this map for the Lake Burien Neighborhood land use. See Agenda 12(c), Exhibit 9. Preferred Alternative Land Use Map – with Corrections - July 3, 2024 from the Sept. 9, 2024 memo reference, pg. 14 of 104. Contrary to what the title for Exhibit 9 says, the land use color designation for all of the Lake Burien Neighborhood has still not been corrected

We cannot understand why the Planning Commission proposed to rezone the homes on the north side of Lake Burien to R-2 or R-3 rather than R-1 and changed the land use to Residential Low 2 rather than leaving it at Residential Low 1. It seems to us that existing conditions on the north side of the lake are comparable to the south side of the lake and that the entire area enjoys equal protection from the SMP.

In contrast, the northside of SW 152nd already has the kind of development associated with R-2 and R-3 proposed zoning. This Seahurst Neighborhood area has

no Critical Areas or Shoreline jurisdiction associated with it. And if the city was desperate for additional housing units, the city could easily extend the orange color-designating Residential Low 2 further north into that section of that neighborhood up to the Seahurst Elementary School. We think these changes to the Lake Burien Neighborhood section of the Burien Land Use map and land use intensity of the neighborhood were either a flat-out mistake or else a simple political maneuver without any real teeth given the SMP. For these reasons, we are requesting that the entirety of the Lake Burien Neighborhood and Shoreline be changed to Residential Low 1 on the Land Use Map and the preferred, proposed Zoning be R-1.

As residents of the Lake Burien Neighborhood/Shoreline of the State, we are asking politely that the city correct their errors before the

2044 draft Comp Plan Land Use Map, draft Comp Plan text and draft 2044 EIS are finalized and voted on and approved by the Council. This is a very simple situation to correct and the last thing we need to do is to involve more lawyers in it. This is the stage of the Comp Plan legislative process where the Council raises the questions, examines the data and facts, and requests the changes before the draft Comp Plan text, draft Comp Plan Land Use Map and draft zoning exhibits are finalized and voted on. Council members, Planning Dept. and Berk Consultants, we would appreciate your attention to these errors and correct them.

The fix is quite simple for the draft Land Use Map; just change the orange color around Lake Burien-on all sides- to light yellow. Our previous emails to you- on several occasions- have discussed this needed correction for consistency with the Burien SMP.

3. Corrections to the 2044 draft Burien Comp Plan text- All of those areas where the Shorelines are discussed currently only mention the Puget Sound Marine Shorelines. These sections need to be corrected to also state that Burien has a freshwater shoreline around the Lake Burien Neighborhood. We have already sent you the page numbers where these corrections need to be made.

4. Corrections to the 2044 draft Burien Comp Plan EIS- All of those areas where the Shorelines are discussed currently only mention the Puget Sound Marine Shorelines. These sections need to be corrected to also state that Burien has a freshwater shoreline around the Lake Burien Neighborhood-impacts and mitigation discussions need correction also. Likewise, the 2044 draft Burien Preferred Land Use Map and

Preferred Zoning Map needs to be corrected. We have already sent you the page numbers where these corrections need to be made- in our previous emails.

We are requesting that these corrections be made before the final Public Hearing on this 2044 draft Comp Plan is held.

Thank you for your attention to our communications and this matter.

Respectfully,

Dr. C. Edgar and Dr. R. Edgar

From: Liz Stead
Sent: Monday, September 30, 2024 1:16 PM
To: 12674shore@gmail.com
Subject: RE: CTTC - FW:

Dr. Edgar, please note I will not be at the meeting this evening, so I didn't want you to bring in the document expecting my attendance. I did not miss your concerns regarding a map change, but that is a decision that the Council is responsible for making. As I have previously noted, the proposed zoning and Comprehensive Plan designation were deliberate choices made by the Planning Commission and are not inconsistent with the SMP regulations. If the Council directs change after the Public Hearing staff will make any changes that they request regarding this issue.

Thank-you, Liz

Liz Stead
Community Development Director

City of Burien
(206) 248-5501 Office
(206) 300-7934 City Cell
LizS@burienwa.gov
Burienwa.gov

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Monday, September 30, 2024 12:38 PM
To: Liz Stead <LizS@burienwa.gov>
Subject: RE: CTTC - FW:

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Hello Liz Stead,

Thank you for your quick response. I will bring a hard copy version to the Council meeting tonight so that you can see what I am referring to relating to the SMP documents and appendices. That may help your staff in that document search. The IT Dept. can probably find that version of the document that was previously posted out on the city website.

You seem to have missed our concerns about a correction the 2044 draft Burien Land Use Map in your response.

Lastly, please put the us on the Notice Distribution list personally and the LBSC when the FEIS is ready for review. The LBSC's notice can be sent to Diane Wilson, Sec. for the LBSC. I think you have her address. Thank you.

Respectfully,
Dr. C. Edgar and Dr. R. Edgar

From: Liz Stead
Sent: Monday, September 30, 2024 11:12 AM
To: 12674shore@gmail.com
Subject: RE: CTTC - FW:

Dr. Edgar,

Regarding your concerns about the Shoreline Master Program (SMP) information no longer being available online, please use the following link where you will find information about the SMP in Burien: https://www.burienwa.gov/city_hall/laws_regulations/shoreline_master_program There is also a link to the Burien Municipal Code (BMC) Title 20, which is where the regulations live in the code. I will review further with staff and determine if we are missing any documents online, including appendices that we can add to the website.

Staff has updated the Draft Environmental Impact Statement (DEIS), under the soon to be issued Final Environmental Impact Statement (FEIS). The FEIS will be issued in a timely manner prior to any action being taken on the Comprehensive Plan or related documents. Please note, as per requirements, the FEIS specifically addresses comments that were made during the official comment period for the DEIS.

Staff has received your comments in your previous letters and continues to reiterate that the SMP is not being negated by the change in zoning but will still apply to all parcels that are under it's jurisdiction. The development potential of any parcel in the city may be constrained by regulations associated with any number of environmental challenges, this would include many of the lots surrounding Lake Burien. Where and how each parcel is constrained is a review for any future development scenarios.

Staff will begin to work with the Planning Commission regarding middle housing in the R1-R3 zoning districts after the first of the year, and we invite your participation as we work to bring Burien's zoning code into compliance with state mandates for middle housing.

Thank-you,

Liz Stead

Liz Stead
Community Development Director

City of Burien
(206) 248-5501 Office
(206) 300-7934 City Cell
LizS@burienwa.gov
Burienwa.gov

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Monday, September 30, 2024 8:30 AM
To: Public - City Clerk <cityclerk@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>; Adolfo Bailon <AdolfoB@burienwa.gov>; Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Linda Akey <LindaA@burienwa.gov>; Jimmy Matta <jimmym@burienwa.gov>; Public - Planning <planning@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>; Liz Stead <LizS@burienwa.gov>
Cc: Garmon Newsom II <GarmonN@burienwa.gov>
Subject: CTTC - FW:

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

From: 12674shore@gmail.com <12674shore@gmail.com>
Sent: Sunday, September 29, 2024 7:09 PM

Subject:

Topic-2044 draft Burien Comp Plan text, 2044 draft Burien Comp Plan Land Use map, 2044 draft Burien Zoning proposed designations and exhibits, 2044 draft Burien Comp Plan DEIS and FEIS

To the Burien City Clerk-Please put this letter in Comments to the Council for the Sept. 30, 2024 Burien City Council meeting and in minutes to the meeting for the Sept.30, 2024 Council meeting.

Please distribute this letter to the Council meeting ASAP so that they can read it before the meeting.
Thank you.

To the Burien City Council and City Manager;

We have written to you on several occasions about corrections needed the documents named in the topic line of this letter. Some of these are simple errors of omission, simple errors for correction and errors that occurred for lack of accurate knowledge about the Lake Burien Neighborhood- its designation as a Shoreline of the State, the SMP, the lack of understanding the concept of “no net loss” and the processes for “best available”(BAS) science. The GMA also requires the standard of “no net loss” and the use of “best available science” to test for it. In each of these Master Plans, the “land always speaks first”. That means, that no matter what grandiose plans, schemes of closed committees and closed staff generated reports the city might have for land use development, node development, administrative convenience, cosmetic appeal or the taking of private property, “the land speaks first”. That principle also applies to resident and nonresident political activist group who sought to “skew the data, survey results and public engagement events and the real directives of the GMA and the SMP starting back as far as 2022. Such an online group has come to our attention that allegedly claim to have worked to subvert the developmental stages of this Comp Plan process for their own purposes. This raises serious ethical concerns about how it impacted the work of the consultants and current members of the Planning Commission and other committees regarding how that skewed data might have prejudiced and influenced decisions about the proposed 2044 Land Use map and proposed 2044 Zoning land use changes to the Lake Neighborhood/Shoreline.

It appears that the 2044 draft Land Use Map is in error for the Lake Burien Neighborhood and creates an inconsistency between its other related documents that state that there will be no changes in the shorelines. It is also inconsistent with the SMP. It is inconceivable how the north, east and west sides of this residential use Shoreline Neighborhood would be put on the land use map at a different land use than the south side of essentially the same neighborhood shoreline. How the 2044 draft Burien alternative Land Use map was finally decided on, of what parts were taken from alternative 2 & alternative 3 maps is not clearly unexplained to the reader. Please correct the 2033 Land Use Map for the Lake Burien Neighborhood to Residential Low-RL-1.

Please note- the current 2013 SMP (the complete SMP plan and appendices can no longer be found on the city website) for citizens and the Council to read and reference. It was removed from online after Susan McClain took over planning. Also, the complete hard copy 2013 and revised 2018 SMP reference guide for researcher use was removed from the public user computer front area. Please post it online for easy reader use or replace a hardcopy to the public computer area bookshelf.

With the lack of definitive or even approximate detail being lacking for the land use texts designations & maps and zoning designations for residential R-1, R-2 and R-3 (which will not even be decided until 2025 after the Comp Plan is approved), makes it difficult for the average citizen and public to understand what they are reading and what is happening to their residential property. It is so confusing that residents don't even know how or what to comment about or to intelligently articulate their concerns. Citizen questions continue to remain unanswered about this Plan and the implications for the residential zoning

changes to property owners.

We are requesting that the Council consider our comments and concerns before voting to approve this 2044 draft Comp Plan and its associated maps, exhibits and SEPA documents.

As the time draws very near to a final vote by the Council and the issuance of the 2044 Burien FEIS, we would like to review this WAC for the Council. That is where the agency is required to provide this information, as specified in the [WAC 197-11-560](#)

WAC 197-11-560

FEIS response to comments.

(1) The lead agency shall prepare a final environmental impact statement whenever a DEIS has been prepared, unless the proposal is withdrawn or indefinitely postponed. The lead agency shall consider comments on the proposal and shall respond by one or more of the means listed below, including its response in the final statement. Possible responses are to:

(a) Modify alternatives including the proposed action.

(b) Develop and evaluate alternatives not previously given detailed consideration by the agency.

(c) Supplement, improve, or modify the analysis.

(d) Make factual corrections.

(e) Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency's response and, if appropriate, indicate those circumstances that would trigger agency reappraisal or further response.

(2) All substantive comments received on the draft statement shall be appended to the final statement or summarized, where comments are repetitive or voluminous, and the summary appended. If a summary of the comments is used, the names of the commenters shall be included (except for petitions).

(3) In carrying out subsection (1), the lead agency may respond to each comment individually, respond to a group of comments, cross-reference comments and corresponding changes in the EIS, or use other reasonable means to indicate an appropriate response to comments.

(4) If the lead agency does not receive any comments critical of the scope or content of the DEIS, the lead agency may so state in an updated fact sheet (WAC [197-11-440](#)(2)), which shall be circulated under WAC [197-11-460](#). The FEIS shall consist of the DEIS and updated fact sheet.

(5) If changes in response to comments are minor and are largely confined to the responses described in subsections (1)(d) and (e) of this section, agencies may prepare and attach an addendum, which shall consist of the comments, the responses, the changes, and an updated fact sheet. The FEIS, consisting of the DEIS and the addendum, shall be issued under WAC [197-11-460](#), except that only the addendum need be sent to anyone who received the DEIS.

(6) An FEIS shall be issued and circulated under WAC [197-11-460](#).

Thank you for your time and consideration.

Respectfully,

Dr. C. Edgar and Dr. R. Edgar

From: Dave Bricklin <bricklin@bnd-law.com>

Sent: Thursday, October 3, 2024 2:38 PM

To: CityClerk@burienwa.gov; 'Adolfo Bailon' <adolfo@burienwa.gov>; kevins@burienwa.gov; stephaniem@burienwa.gov; jimmym@burienwa.gov; planning@burienwa.gov; Liz Stead <LizS@burienwa.gov>; GarmonN@burienwa.gov

Cc: Lisa Grueter <Lisa@berkconsulting.com>

Subject: PROPOSED ZONING CODE

The Comp Plan DEIS states that the proposed actions being assessed includes amendments to the zoning code (and other development regulations). I have been unable to find those proposed zoning code (and other development regulation) amendments. Do they exist? If so, please send them to me or let me know where I can locate them on your website. Thank you.

David Bricklin

Bricklin & Newman, LLP

123 NW 36th Street, Suite 205

Seattle WA 98107

1-206-264-8600

bricklin@bnd-law.com

<http://www.bnd-law.com>

From: Jon M Newton <4barkingdogsbrewery@gmail.com>

Sent: Saturday, October 5, 2024 8:07 AM

To: DL - SYC <SYC@burienwa.gov>

Subject: Salmon Creek Neighborhood Plan

Where is the Salmon Creek Neighborhood plan we developed and implemented in the previous Comp Plan? I have reached out to the city to review this existing plan for the Comprehensive plan but didn't get a response.

Who is the point of contact with the city?

Jon M Newton

11900 28th Ave SW, Burien, WA 98146

206-660-5902

From: Diane Wilson <bdbgwilson@comcast.net>

Sent: Sunday, October 6, 2024 9:04 PM

To: Public - City Clerk <cityclerk@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>

Cc: Public - Planning Commission <planningcommission@burienwa.gov>; hanna.jim@gmail.com; Kaitlyn Spore <sporonil26@gmail.com>; daniel.j.dupre@gmail.com

Subject: CTTC - Letter to Council for Public Hearing 10.7.2024

CAUTION: This email originated from **outside** of the City of Burien. Do not click links or open attachments unless you recognize the sender and have verified the contents are safe.

Please include this letter in public comment for the public hearing on October 7th, 2024. Please include as part of the public record.

Letter to Burien City Council October 6, 2024

Dear Council Members:

The purpose of this letter is to get clarification of an apparent contradiction / disconnect between the proposed designation of residential parcels bordering Lake Burien on the West, North and East as Residential Low-2 and the present zoning of those parcels. The proposed RL-2 CP designation would be a significant increase in density in areas that have been acknowledged to be environmentally sensitive. It is difficult to see how the density objectives of the RL-2 designation can be achieved while maintaining current environmental protections for parcels classified as shoreline and wetlands buffers and aquifer recharge areas.

Planning Commission documents assure us that "Regardless of the Future Land Use Plan designation or implementing zoning, Burien's critical areas regulations and shoreline master program regulations will continue to apply to ensure

environmental quality." But this could be very misleading. Because the proposed zoning regulations for residential parcels have not yet been developed, we don't know how any conflicts with the critical areas and shoreline master program regulations that arise will be resolved by the City. According to planning documents, the City plans to propose new residential zoning regulations in 2025. Does the City contemplate amending the critical area and shoreline master program regulations to accommodate the RL-2 designation in these environmentally sensitive areas?

The disconnect between the proposed CP density changes and the existing zoning also impacts preparation of the forthcoming FEIS. Will the FEIS assess impacts based on an assumption that the CP's increased density around the lake will be inconsequential because the zoning will not change? Or will the FEIS assess impacts associated with a future increase in the zoning density, too. The FEIS should address not just the immediate impacts of the proposed CP map changes, but the reasonably foreseeable indirect impacts, too. If the City contemplates increasing the zoning density to reflect the

proposed CP density increase, the EIS should evaluate those reasonably foreseeable impacts now, in the FEIS.

Applying the RL-1 designation around the lake makes more sense. The RL-1 designation represents a significant increase in density over the present zoning. Applying that designation around the lake would be more likely to result in increased density without conflicting with environmental regulations and diminishing environmental protection. While we recognize the desirability of increased housing density along transportation routes and expanding middle housing, we believe that designating the parcels on the West, North and East shores of Lake Burien as Residential Low-1 would contribute to those goals with less potential for creating regulatory conflict or harming the environment, especially given the cutbacks in bus service along 152nd Street.

In summary, we request that the Burien City Council amend the 2044 Comprehensive Plan Update to designate all residential parcels bordering Lake Burien as RL-1.

We request a response regarding whether the City intends to modify the Critical Area Ordinance or Shoreline Management Program regulations to allow the increased density provided by the proposed RL-2 designation of the parcels described above.

We request that the City provide a schedule for the completion of the proposed zoning and FEIS to make it possible to understand the implications of the 2044 Comprehensive Plan Update for the Lake Burien ecosystem.

Thank you for your attention to this matter,

Lake Burien Shore Club Board of Directors
Kaitlyn Spore, President
Jim Hanna, Vice President
Dan Dupre, Treasurer
Diane Wilson, Secretary

From: 12674shore@gmail.com <12674shore@gmail.com>

Sent: Monday, October 7, 2024 12:18 PM

To: 'City Clerk' <cityclerk@burienwa.gov>; 'Public - Council Inbox' <Council@burienwa.gov>; 'Adolfo Bailon' <AdolfoB@burienwa.gov>; 'Kevin Schilling' <KevinS@burienwa.gov>; 'Stephanie Mora' <StephanieM@burienwa.gov>; 'Linda Akey' <LindaA@burienwa.gov>; 'Jimmy Matta' <jimmym@burienwa.gov>; 'Public - Planning' <planning@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>; Liz Stead <LizS@burienwa.gov>

Cc: 'Garmon Newsom II' <GarmonN@burienwa.gov>

Subject:

City Clerk <cityclerk@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>; Adolfo Bailon <AdolfoB@burienwa.gov>; Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Linda Akey <LindaA@burienwa.gov>; Jimmy Matta <jimmym@burienwa.gov>; Public - Planning <planning@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>; Liz Stead <LizS@burienwa.gov>
Cc: Garmon Newsom II <GarmonN@burienwa.gov>

To the City Clerk-Please place these comments for the Public Hearing on Ordinance 847, 2044 draft Burien Comp Plan to the Council members and distribute them ASAP so the Council can review them before the Public Hearing. Also, place these comments in minutes to the Oct. 7, 2024 meeting and Public Hearing. Thank you.

To the Burien City Council and the City Manager;

These are our comments for the Ordinance 847, 2044 draft Burien Comp Plan;

1. Plan Amendment, pg.30 of 1002-states that the Comp Plan(CP) is a document that is in meant to be periodically updated and reviewed and revised. Yet when we have approached the Planning Dept.

to correct the language in the CP text to state that the Lake Burien Shoreline is a shoreline and a shoreline habitat in the city along with the Puget Sound Marine Shorelines, they have refused to make the changes. Their claim being that it was not in the previous CP document. Simply because an error of omission occurred in the previous CP is not justification for not correcting the CP text now. The same text omission occurred in the DEIS. . The City of Burien did not have a SMP of its own until 2013. Perhaps, that is why it was missing from the previous Comp Plan when the consultant and the Planning Dept. looked at it. Correct the error now. Chapter 8 of the 2044 draft Burien Comp Plan- Fails to name the Lake Burien Shorelines with the Puget Sound Shorelines for Burien. -correct this

Bullet arrow Shoreline Habitats, pg.168 of 1002. Also, the Planning Dept has argued that because the LBSC and we as residents missed the Public Comment period for the DEIS are comments don't count now for the FEIS. That is not accurate according to

FEIS response to comments.

(1) The lead agency shall prepare a final environmental impact statement whenever a DEIS has been prepared, unless the proposal is withdrawn or indefinitely postponed. The lead agency shall consider comments on the proposal and shall respond by one or more of the means listed below, including its response in the final statement. Possible responses are to:

(a) Modify alternatives including the proposed action.

(b) Develop and evaluate alternatives not previously given detailed consideration by the agency.

(c) Supplement, improve, or modify the analysis.

(d) Make factual corrections.

(e) Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency's response and, if appropriate, indicate those circumstances that would trigger agency reappraisal or further response.

(2) All substantive comments received on the draft statement shall be appended to the final statement or summarized, where comments are repetitive or voluminous, and the summary appended. If a summary of the comments is used, the names of the commenters shall be included (except for petitions).

(3) In carrying out subsection (1), the lead agency may respond to each comment individually, respond to a group of comments, cross-reference comments and corresponding changes in the EIS, or use other reasonable means to indicate an appropriate response to comments.

(4) If the lead agency does not receive any comments critical of the scope or content of the DEIS, the lead agency may so state in an updated fact sheet (WAC [197-11-440](#)(2)), which shall be circulated under WAC [197-11-460](#). The FEIS shall consist of the DEIS and updated fact sheet.

(5) If changes in response to comments are minor and are largely confined to the responses described in subsections (1)(d) and (e) of this section, agencies may prepare and attach an addendum, which shall consist of the comments, the responses, the changes, and an updated fact sheet. The FEIS, consisting of the DEIS and the addendum, shall be issued under WAC [197-11-460](#), except that only the addendum need be sent to anyone who received the DEIS.

(6) An FEIS shall be issued and circulated under WAC [197-11-460](#)

As we currently understand the process, the FEIS has not been issued yet. We are requesting that the LBSC and we as individual residents(Dr. C. Edgar and Dr. R. Edgar) receive notice of the FEIS distribution list..

We are requesting that the City provide a schedule for the completion of the proposed zoning and FEIS to make it possible to understand the implications of the 2044 Comprehensive Plan Update for the Lake Burien ecosystem.

As to corrections of the 2044 Draft EIS;

At [1.6.1.2](#), pg 1-18, line 2-will need to read-"High growth potential is not indicated for the marine shorelines and not for the Lake Burien freshwater shorelines".

This change refers to discussions about both Alternatives 2 and 3 maps.

At [1.6.1.3](#), pg. 1-22-The statement” Both Alternatives 2 and 3 state”... development intensity avoids the shorelines”. That means that the Lake Burien Neighborhood Shorelines should also be low intensity in development too. The Land Use Map and Land Use Intensity Map around the node should reflect low land use intensity development.

Chapter 2, Exhibit 2.3.11, pg. 2-20- the Lake Burien Neighborhood should be changed to Residential Low 1 and Zoning R-1. Colors in the key to reflect that change.

Chapter 3, Natural Environment, pg. 3-2, Add and identify”... Lake Burien as a freshwater shoreline in Burien”.

2. Section 1 - Equity, Policy 1.14, pg. 34 or 1002 states when developing Burien’s strategic plans, policies and programs, meaningfully engage with the communities who will be most impacted by the plan, policy or program. We would like to call the city’s attention to the Planning Advisory Committee which had no representatives from the Lake Burien Neighborhood on it. No one in the Lake Burien Community Club and no neighborhood residents were contacted to serve on the Committee. We belong to one of the noted underrepresented groups in this policy and yet no one attempted inclusive outreach to us to serve on the Committee. This was a Committee that according to the Planning Dept. made the decision to change the Land Use Map, the Intensity Land Use Map showing nodes and zoning for the Lake Burien Neighborhood/

Shoreline. The city needs to correct its previous errors to the Lake Burien Neighborhood Land Use Map and follow its own policies for the further work on zoning.

We request that the Burien City Council amend the 2044 Comprehensive Plan Land Use Map Update to designate all residential parcels bordering Lake Burien as RL-1. The 2044 Comp Plan Land Use Map should be consistently light yellow for the entire neighborhood indicating RL-1. As a shoreline of the State the most restrictive policy prevails, and the Land Use Map should be represented on the Land Use Map as RL-1.

3. Section 2, Land Use. The maps in this section of the document are very difficult to read. They appear to have been made by Makers/consultants. They lack clarity, street names, color accuracy and readability.

This is in violation of the GMA where the documents are supposed to be easily readable and understandable to the average citizen. We request the maps be improved to the standard of the maps shown in the current Burien Maps Library for previous Comp Plans. Shown on the city website. That the Exhibit 2.3, pg. 44 of 1002 be corrected to show the Seahurst node as low intensity and the land use surrounding it as low land use intensity also. The Lake Burien Neighborhood background intensity needs to be changed to light yellow.. In Section 2 there is repeated discussion about the LU-1 map. However, there

are no maps or exhibits in the section that are labeled as the LU-1 map. We are requesting that this be corrected so the reader knows what is the LU-1 Map that is being referred to.

Per the designations provided on pg. 51 of 1002, the entire Lake Burien Neighborhood should be identified as Residential Low 1 and the 2044 draft Burien Land Use Map should reflect that by being correctly colored on the preferred alternative map, Exhibit 2.4, pg.48 of 1002. Excluding the NAVOS site.

4. pg. 57 of 1002. Policy 2.5-1. States that the city will encourage and support the development of subarea or neighborhood plans and supply administrative support and personnel to support neighborhoods, etc.

Once adopted, the plan will be periodically reviewed. The city had this previously in the CP and then abandoned it-Neighborhood Plans- because it claimed it didn't have the staff and resources to support such a plan. Does this mean that the draft CP is again reinstituting Neighborhood Plans?

5. Policy 2.10.1, pg. 62 Of 1002-...Discourage development and land use decisions that adversely impact the natural environment. Based on that policy we are requesting a correction to the 2044 draft Land Use Map for the Lake Burien Neighborhood to RL-1.

6. pg. 168 of 1002, Shoreline Habitats – be corrected to identify the Lake Burien Neighborhood/Shoreline as a freshwater shoreline habitat.

7. Lastly, we have requested that the Stormwater Outlet Map for the Lake Burien Neighborhood be corrected to show the 11 outlets. We have provided the historical and correct map to the Public Works Depart. so they a corrected version of the map. This is a important tool to have as the Neighborhood and some homes flood during heavy rain and storm events. And it can be used for emergency cleaning and clearing purposes. Please return these official maps back to us.

Thank you for your time and attention to our comments and concerns.

Respectfully,

Dr, C, Edgar and Dr. R. Edgar

From: Gretchen Erickson <gretchenerickson@me.com>

Sent: Monday, October 7, 2024 1:57 PM

To: City Clerk <cityclerk@burienwa.gov>; Public - Council Inbox <Council@burienwa.gov>; Adolfo Bailon <AdolfoB@burienwa.gov>; Kevin Schilling <KevinS@burienwa.gov>; Stephanie Mora <StephanieM@burienwa.gov>; Linda Akey <LindaA@burienwa.gov>; Jimmy Matta <jimmym@burienwa.gov>; Public - Planning <planning@burienwa.gov>; Lisa Grueter <Lisa@berkconsulting.com>; Liz Stead <LizS@burienwa.gov>; Cc: Garmon Newsom II <GarmonN@burienwa.gov>

Subject: Public Hearing On Ordinance 847, the 2044 draft Burien Comp Plan/2044 Burien Land Use Map

To all Council Member and City Officials,

As residents of the Lake Burien Neighborhood our testimony for the Public Hearing on Ordinance 847, the 2044 draft Burien Comp Plan that the 2044 draft Burien Land Use Map should consistency show the entire Lake Burien Neighborhood/Shoreline as Residential Low R-1 Land Use (RL-1)-excluding the Navos property. The Lake Burien Neighborhood is a protected Shoreline of the State. The most restricted rule governing its protection prevails. The Land Use Map should reflect that. The Lake Burien Neighborhood is best described by the designation Residential Low-1 RL-1 and the zoning for the area is best described by R-1. We are requesting that the Council make that change to the 2044 draft Burien Land Use Map for the Lake Burien Neighborhood.

We have lived on Lake Burien since 1981 and appreciate you correcting this to protect the lake ecosystem and our investment.

Sincerely,

Frank and Gretchen Erickson

206-243-8835

