

Supplement to the Cumulative Impacts Analysis

This document is a supplement to the Cumulative Impacts Analysis that was prepared by Reid Middleton in August 2009 as an element of the City of Burien Shoreline Master Program (SMP) Update. This supplement provides an additional level of detail and an updated analysis based on the latest version of the Burien SMP.

1) Executive Summary

The Burien SMP consists of a package of policies and regulations that are designed to meet or exceed the goals of the Shoreline Management Act of 1971 (RCW 90.58) as reflected in the Shoreline Master Program Guidelines of 2003 and 2011 (WAC 173-26).

The policies and regulations in the Burien SMP include, but are not limited to

- 1) a variable width Shoreline Buffer
- 2) a variable width Vegetation Conservation Buffer
- 3) adoption of Burien's Critical Area Ordinances (CAO) by reference with minor exceptions
- 4) regulation for flood hazard reduction and shoreline stabilization

The preparation of the Supplement to the Shoreline Inventory demonstrated that development conditions in Burien's urban shoreline vary considerably particularly along the Puget Sound shoreline. The inventory identified 19 Shoreline Inventory Segments, 18 of them along the Marine, based on typical setbacks, density of impervious surfaces, density of natural vegetation, impacts based on terrain, and development impacts from existing roadways. The boundaries for these segments is based on these development conditions and well defined geographical markers.

The Supplement to the Shoreline Analysis and Characterization demonstrated that it is reasonable to assign each Inventory Segment to one of four Shoreline Planning Areas based on existing development patterns.

The SMP includes new regulations that place particular limits on new development within a Shoreline Buffer and a Vegetation Conservation Buffer. The dimensions of these buffers is fixed within a given Shoreline Planning Area but vary along the Shoreline.

This analysis will consider each planning area in turn and demonstrate that the SMP includes the policies and regulations that are required to meet the SMP guidelines, with particular attention to the no net loss standard, in the context of reasonably foreseeable future development.

2) Review of the Supplements to the Shoreline Inventory and Analysis

The original Shoreline Inventory developed by Grette Associates LLC partitioned Burien's shoreline in to five Shoreline Inventory Reaches; one for all of Lake Burien and four for the shoreline along Puget Sound. The original Shoreline Analysis and Characterization noted that Inventory Reach M2 is in a comparatively natural condition and assigned this reach to the Urban Conservancy environmental designation while the remaining reaches were assigned to Shoreline Residential. However most of the remaining discussion treated these reaches as if the environment and existing conditions were relatively consistent.

The *Supplement to the Shoreline Inventory* confirmed the decision to use two environmental designations and verified that development conditions around Lake Burien are reasonably uniform. However the additional detail in this supplement demonstrated that conditions within M1, M3, and M4 vary to a degree that was not evident in the initial inventory. The Supplement to the Shoreline Inventory surfaced this variation by refining the 5 Inventory Reaches into 19 Inventory Segments; one segment matches all of Lake Burien and the remaining 18 segments are along Puget Sound.

The *Supplement to the Shoreline Analysis* organized these segments in to 4 planning areas; one for Lake Burien (SR-LB), one for M2 (UC-NA), and two for the segments in M1, M3, and M4 based on the intensity of development adjacent to OHWM (SR-HA and SR-AL).

Figure 1 provides an indication of the boundaries of the 5 Inventory Reaches and the 19 Inventory Segments. Figure 2 indicates the aggregation of the Inventory Segments in to 4 Shoreline Planning Areas. Note that there are cases in which two or more adjacent Inventory Segments may be assigned to the same Shoreline Planning Area.

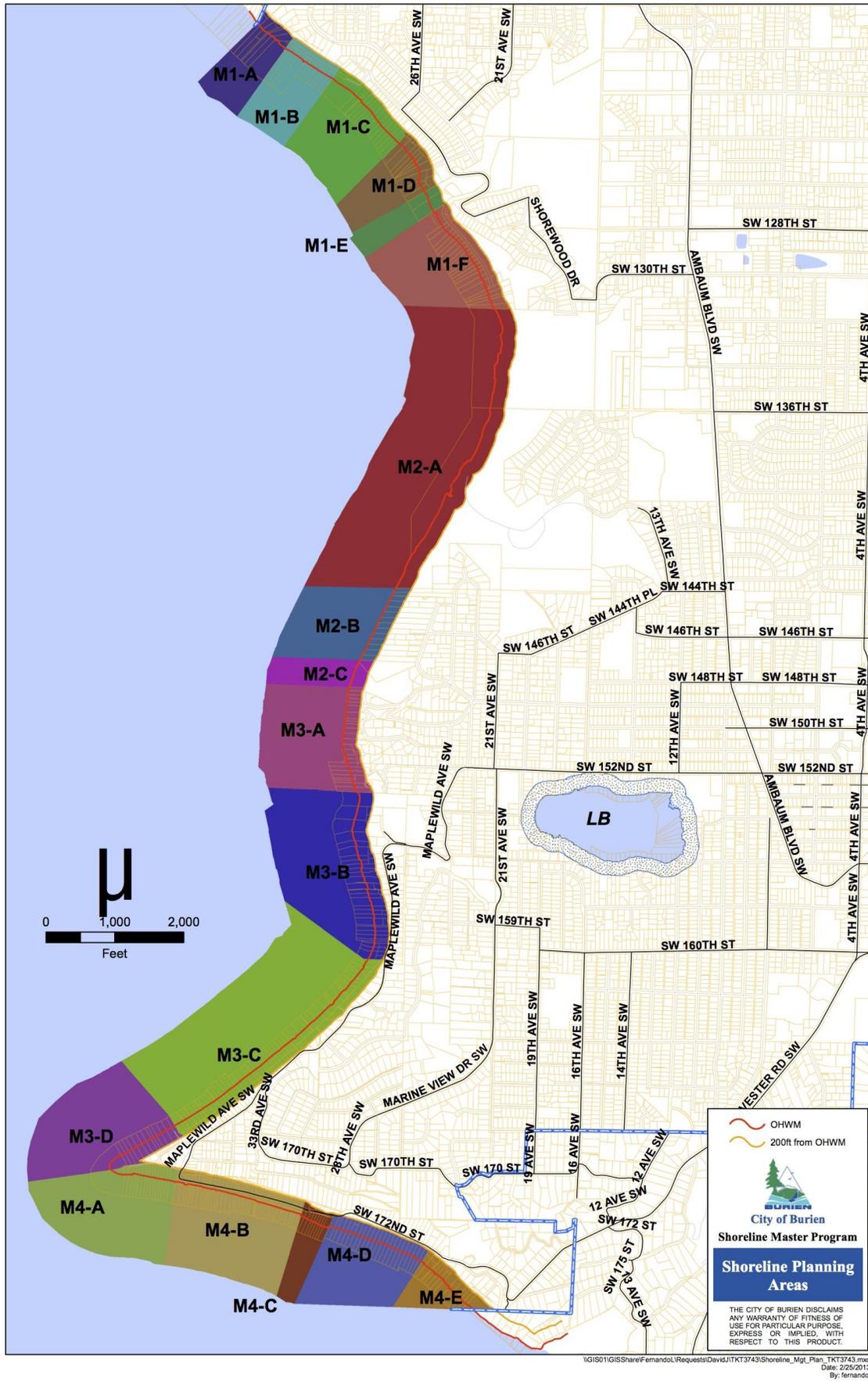


Figure 1: The Shoreline consists of 5 Inventory Reaches and 19 Inventory Segments



Figure 2: The Shoreline consists of 4 Planning Areas

The Supplement to the Analysis introduced a *Planning Metric* that provides a numerical measure that is correlated to the level of ecological function. A metric value of 0 implies little or no remaining ecological function and 10 implies largely natural function. Please refer to the analysis document for more detail on the developments of estimation of this metric.

Table 1 provides a review of a few of the more significant indicators of existing development grouped by Planning Area and style of development taken from the Supplement to the Shoreline Characterization and Analysis. Recall that the indicators for setbacks and area are *typical* values, values between the 25th and 75th percentile, and not the full range of values.

	Style	Length		Setback	Area (sq. ft.) (000's)	Metric			
		(ft)	(%)			B	1st 100'	2nd 100'	Total
UC-NA	Natural	5,811	22.5	> 200	46.3 - 69.6	0.7	4.9	3.0	8.6
SR-AL	Level	3,339	12.9	41 - 90	11.3 - 19.0	0.3	1.1	0.5	2.0
	Low	6,698	25.9	20 - 50	6.8 - 15.6	0.0	2.7	1.9	4.7
	High	2,197	8.5	126 - 233	13.9 - 21.2	0.0	4.7	1.2	6.0
	Undev	1,328	5.1	NA	11.4 - 32.1	0.4	5.3	2.6	8.3
	Total	13,562	52.5	30 - 94	8.2 - 17.5	0.0	3.0	2.2	5.2
SR-HA	Exc 172	4,644	18.0	25 - 35	5.0 - 8.5	0.5	0.2	2.2	2.9
	172nd	1,810	7.0	70 - 95	7.2 - 10.4	0.5	0.0	2.4	2.9
	Total	6,454	25.0	25 - 75	5.2 - 9.4	0.5	0.1	2.3	2.9
Marine	Total	25,827	100.0	30 - 90	7.4 - 15.0	0.3	2.7	2.0	5.0
SR-LB	Level	5,374	100.0	80 - 125	15.1 - 26.1	0.2	1.8	0.5	2.5

Table 1: Indicators for Burien's Marine and Lake Shorelines

The supplement to the analysis also considered the applicability of the Department of Ecology’s Potential No Net Loss Indicators from chapter 4 of the SMP Handbook to Burien’s shoreline. Ten of the indicators were determined to be particularly relevant to Burien’s Shoreline and five of those were deemed to be particularly amenable to development planning activities. These five indicators are repeated in Table 2.

Indicator	Functions Affected
Impervious surface area (acres or percentage)	Water quality and habitat
Vegetation coverage in shoreline buffer; acres/percent by class	Water quality and habitat
Shoreline stabilization; Linear feet of bulkheads, retaining walls, etc.	Sediment supply
Piers/docks/floats, overwater structures; number or sq. ft.	Water quality and habitat
Wetlands acreage	Water quality

Table 2: Applicable No Net Loss indicators from SMP Handbook

More information on Inventory Segments, planning areas, and Indicators for No Net Loss can be found by reference to the aforementioned documents.

The Burien SMP incorporates a strategy for managing new development in the shoreline that includes a Shoreline Buffer, a Vegetation Conservation Buffer, and standards for flood hazard reduction and shoreline stabilization. This strategy is tailored to the four planning areas by customization of the sizes of the Shoreline Buffer and Vegetation Conservation Buffer as reflected in BMC 20.30.050 Dimensional Standards for Shoreline Development. Table 3 repeats that information with the addition of the allowed total impervious surface coverage for the underlying zoning designations.

	UC-NA	SR-LB	SR-AL	SR-HA
Shoreline Buffer Zone 1	50 ft	30 ft	30 ft	20 ft
Shoreline Buffer Zone 2	100 ft	15 ft	15 ft	15 ft
Vegetation Conservation	200 ft	150 ft	150 ft	150 ft
Lot Size	RS-12,000	RS-7,200	RS-12,000	RS-12,000
Building Coverage	30%	35%	35%	35%
Impervious Surface Coverage	45%	70%	45%	45%

Table 3: Dimensional Standards for Shoreline Development

UC-NA: Urban Conservancy

SR-LB: Shoreline Residential - Lake Burien

SR-AL: Shoreline Residential - Marine altered

SR-HA: Shoreline Residential - Marine highly altered

3) No Net Loss and Reasonably Foreseeable Future Development

The Department of Ecology is required to review the proposed updates to every jurisdiction's Shoreline Master Program to assure that it is consistent with Shoreline Master Program Guidelines of 2003 and 2011 (WAC 173-26).

A central element of this review is to verify that the SMP will assure no net loss of ecological function as a result of reasonably foreseeable future development. Presentations by the Department of Ecology (DOE) in Burien and discussions with representatives of DOE indicate that a primary concern is that, over time, there is a common trend for development to move closer and closer to OHWM and hence impact the ecological function and habitat of the shoreline.

This section considers the likely pressures for future development, evaluate the effectiveness of the update to the SMP to manage these pressures, and demonstrate that the no net loss standard is likely to be achieved. It is convenient to consider this standard for each Planning Area in turn.

This evaluation considers four dominant styles of possible development

- Development of currently undeveloped properties
- Maintenance and redevelopment of existing structures
- Addition of new structures to developed properties
- Restoration activities

In each case the attention is focused on the likelihood that the development activity will increase the overall levels of impervious surface and partially functioning surfaces at the cost of existing natural vegetation. This concern grows as the new development approaches OHWM.

It is important to note that Burien's shoreline is primarily public parks and privately owned parcels that are zoned as, and developed as, single family residences. There is no commercial development in Burien's shoreline and there is no expectation that commercial activities or multi-family residences will be allowed in the future.

3.1) Lake Burien (SR-LB)

Lake Burien is a fresh water lake of slightly over 1 mile in perimeter with 70 waterfront properties and 8 upland properties within Shoreline Jurisdiction. The lake is zoned as RS-7200 but existing development conditions are generally consistent with RS-12000; typical lot sizes are 15K to 26K sq. ft., building coverage is generally close to 35%, and impervious surface coverage is generally closer to 45% than 70%.

These properties are extensively landscaped and there is little mature native vegetation. Approximately 2/3 of the properties include bulkheads or retaining walls and approximately 2/3 of the properties include docks.

Approximately 10 of the properties include a Category 2 wetland; two of these are significant in size. These wetlands are protected by the Critical Area Ordinances that are adopted by reference into the SMP.

Undeveloped properties

There are two vacant waterfront properties on the lake; one is a TRCT parcel that is co-owned by the three properties directly behind it, and the other is a small parcel that appears to be unbuildable.

The RS-7200 zoning code provides opportunities for sub-division. While it must be assumed that this will occur over a 20 year planning horizon, it is believed that it will be relatively uncommon in practice. Excluding the Ruth Dykeman Center, the typical property is 60' - 86' wide and 185' - 290' deep with a building setback of 80' - 125' from OHWM. This suggests that if subdivision were to occur on a typical property, it would tend to create new upland properties rather than new waterfront properties and would tend to impose the expense of relocating the existing primary structure. This is expected to dampen enthusiasm for this activity. When sub-division does occur it is unlikely to impact many of the indicators in Table 2 other than total impervious surface area in shoreline jurisdiction.

The Ruth Dykeman Children's Center is defined as a special planning area in Burien's comprehensive plan and hence will be subject to special oversight if there are ever efforts to redevelop this property.

If these assumptions prove to be incorrect then the City will have the ability to revisit the zoning code and dampen the opportunity for sub-division.

Redevelopment of existing structures

It appears that the primary driver for new development over a 20 year planning horizon will be redevelopment and renovation of existing primary structures. Many properties are already developed at a level that approaches the allowed building coverage and there is little reason to believe that there will be significant efforts to increase total impervious coverage in the absence of building expansion.

Reference to Table 2, the primary indicators of no net loss, suggests that this class of redevelopment will have little impact on any of the indicators other than incremental increases in total impervious surface area. This will primarily come at the expense of the total area of lawns and flower beds.

Addition of new structures

The Shoreline Analysis identified two primary drivers for additional structures in SR-LB; cabanas and garages. BMC 20.30.095 (2.g) specifically precludes the addition of new accessory structures within the Shoreline Buffer. New garages are likely to be constructed on the landward side of the primary structure.

Opportunities for Restoration

Public comment during the development of the Burien SMP focused attention on the role of storm water management to maintain water quality; a common theme in SMPs in urban jurisdictions. Although the city's Storm Drainage Master Plan is not part of the SMP the requirements of this plan may well represent the best single opportunity to maintain the health of this shoreline over time.

3.2) Marine Reach M2 (UC-NA)

This reach represents approximately 22.5% of the length of the marine shoreline. The abundant dense native vegetation which continues for many 100's of feet beyond shoreline jurisdiction means that this reach contains a substantially larger fraction of the total ecological function along this shoreline than its length would suggest.

Seahurst Park is just under 75% of the reach and, slightly ironically, this park contains most of the alterations along the reach. The Seahurst Park Master Plan, initiated in 2002, called for the expenditure of over \$11M of public money to restore the natural quality of this park with a focus on removing and reconfiguring the bulkheads and seawall.

The remainder of the reach is in a nearly natural condition and this is unlikely to change in a 20 year planning period. This portion of the reach includes particularly steep slopes and all but one of the private homes along this reach have been constructed at the top of this slope. The combination of the steep slope, the city's Critical Area Ordinances for steep slopes, the 150' shoreline buffer, and the 200' vegetation conservation buffer all but eliminates the likelihood that there will be adverse impacts from new development along this portion of the reach.

Undeveloped properties

All of the private waterfront properties in UC-NA have been developed, primarily along 25th Ave SW and 100's of feet from OHWM. These properties are considerably larger than 12,000 sq. ft. but most of the area is on the very steep slopes adjacent to OHWM. This suggests that it is unlikely that there will be significant pressure to sub-divide and then develop adjacent to OHWM.

Redevelopment of existing structures

All but one of the private properties are developed along 25th Ave SW. The steep slopes, the vegetative conservation buffer, and the shoreline buffer make it unlikely that these homes will be relocated towards OHWM. Any expansion of these homes will be well outside shoreline jurisdiction.

Addition of new structures

New accessory structures are expected to be constructed towards the current location of the existing structures and hence generally well outside of shoreline jurisdiction. There is one private residence within shoreline jurisdiction but the challenging terrain makes it unlikely that there will be an effort to construct an accessory structure.

Opportunities for Restoration

The primary opportunities for continued restoration are within Seahurst Park.

There is an additional opportunity for the public to create new permanently protected areas. This would require offering to purchase private land at the base of the steep slopes in M2-B with the associated sub-division to create tax parcels. This would not have an immediate impact on ecological function but it would add this land to permanently protected areas within shoreline jurisdiction.

3.3) Highly altered portions of the Marine (SR-HA)

Shoreline inventory segments M1-B, M1-D, M1-F, M4-A, M4-B, and M4-C have been identified as being highly altered, to contain little or no environmental function within the first 100' from OHWM, and to be relatively immune to adverse impacts from new development. In total these represent approximately 25% of the length of the marine shoreline and a substantially smaller fraction of the existing ecological function.

M4-B is the set of homes on the landward side of SW 172nd St and the remaining segments consist of relatively densely packed homes between a roadway and OHWM.

The Burien SMP replaces the existing 20' setback from OHWM with a 35' shoreline buffer. The first 20' of this buffer, zone 1, plays a role that is comparable to the current setback, and the next 15' of the shoreline buffer provides for limited expansion with mitigation if required. This planning area is also subject to the steep slope elements of the adopted CAO and a vegetation conservation buffer of 150'.

The *Supplement to the Shoreline Inventory* and the *Supplement to the Shoreline Analysis and Characterization* demonstrated that SR-HA has little or no ecological function and is dominated by impervious surface. Almost all of this portion of the shoreline includes bulkheads although they are generally less substantial than is typical for the Marine.

Undeveloped properties

There are no undeveloped waterfront properties in this planning area. However there are substantial levels of mature native vegetation on the landward side of the roads in M1-B and M1-F and behind the homes in M1-D and M4-B. The steep slopes and the vegetation conservation buffer will limit new development on those portions of this planning area.

Redevelopment of existing structures

This planning area is zoned as RS-12000 and the existing structures and total impervious surface coverage are generally at, or perhaps beyond, the allowed limits. The majority of the area around the structures is impervious surface and limited levels of partially functioning area. Any expansion of the existing structures, in the event it is allowed, is unlikely to create new impervious surface.

Addition of new structures

There is relatively little room to construct new structures towards OHWM in this planning area and BMC 20.30.095 (2.g) explicitly disallows new accessory structures within the Shoreline Buffer. The presence of roadways and steep slopes on the landward side of the primary residences is likely to limit applications to construct additional structures.

Opportunities for Preservation

The land adjacent to the structures are constrained by roads and/or steep slopes and there is limited space to install native vegetation between the homes and OHWM. There are few if any opportunities for incremental restoration adjacent to the structures e.g. installation of native vegetation.

It is conceivable that the public could choose to make offers to the existing property owners to purchase those portions of this planning area that are in relatively natural condition and hence add this land to the permanently protected area.

3.4) Altered portions of the Marine (SR-AL)

This planning area represents approximately 52.5% of the length of the marine shoreline. Conditions are substantially altered with single family residences but there are meaningful levels of native vegetation within shoreline jurisdiction. The variety of development patterns within this planning area adds some complexity to the evaluation.

The Burien SMP replaces the existing 20' setback from OHWM with a 45' shoreline buffer. The first 30' of this buffer, zone 1, plays a role that is comparable to the current setback, and the next 15' of the shoreline buffer provides for limited expansion with mitigation if required. This planning area is also subject to the steep slope elements of the adopted CAO and a vegetation conservation buffer of 150'.

Undeveloped private waterfront properties

All of the undeveloped waterfront properties in the Marine shoreline are in this planning area totaling approximately 3% of this shoreline by length. There are ten undeveloped parcels; one in M1-C, two in M3-A, three in M3-B, two in M3-C, and two in M4-D. All of these properties are substantially impacted by steep slopes and include substantial bulkheads.

M1-C: this property is approximately 60' wide and 330' long and stretches over a steep slope between Shorewood Dr SW and OHWM. Neighboring properties are generally developed towards the street, outside shoreline jurisdiction and the constraints of the Burien SMP will drive new development towards this location. Development at the bottom of the slope will require a shoreline variance.

M3-A: these two properties are adjacent to each other. The neighboring properties are developed at the bottom of the steep slope; perhaps because of constraints imposed by the slopes and the location of 28th Ave SW. If these properties are developed it appears it will be necessary to rely on the shoreline variance process.

M3-B: The first undeveloped property is approximately 200' wide and 600' deep. It is on a steep slope and is fully vegetated and is separated from the local roadways. Development within shoreline jurisdiction appears to be challenging without a shoreline variance.

The second property is at about the midpoint of this segment and is located along Mapelwild Ave SW. It is approximately 60' wide and 260' deep. Neighboring properties are developed at both the top and the bottom of the slope but the immediately adjacent properties are developed at the base of the slope. The common line setback element of the Burien SMP would appear to support development at the base of the slope although doing so is likely to result in an adverse impact.

The final undeveloped property in this segment consists of 2 waterfront tax parcels and 4 upland tax parcels. Development on the waterfront parcels would likely require a shoreline variance.

M3-C: The two undeveloped properties in this segment are located towards the steepest portion of the Indian Trail. Both of these properties consist of two tax parcels; one on either side of the Indian Trail. Both properties are significantly impacted by steep slopes and include bulkheads. Development of these properties will be constrained by the adopted CAO, the vegetation conservation buffer, and the shoreline buffer.

M4-D: The first property, towards the north end of this segment, is approximately 60' wide and 260' deep. This property consists of two sections of relatively level ground with a narrow steep slope approximately half-way between OHWM and SW 172nd St. The slope includes significant native vegetation but the level portions are partially functioning areas that appear to be maintained. The lower portion shows evidence of a legacy foundation although the King County assessors database does not include a record of a structure. The property includes a bulkhead.

The second property is approximately 60' wide and slightly over 200' deep. The property is relatively level for 125' from SW 172nd St. The remaining land is a steep slope to the significant bulkhead. A

club house has been constructed adjacent to the bulkhead. It appears that this property is co-owned by several properties on the landward of SW 172nd St.

It is to be expected that some, or even all, of these properties will be developed during a 20 year planning horizon although it must be noted that, with the exception of the club-house in M4-D, none of these properties have been developed during the previous 20 years. A strict application of the Burien SMP will be an obstacle to development towards OHWM for all of these properties. If development occurs then it is likely to be towards the rear of the property, often beyond shoreline jurisdiction, or the development effort will require a shoreline variance.

Relocation of existing structures

The *Supplement to the Shoreline Analysis* partitioned these properties into four categories based on the location of the primary residence and provided several indicators of development; this is repeated as Table 1 of this document. Consideration of these categories reveal five important patterns for relocation of an existing structure:

- 1) Relocation of a home on **level** ground
- 2) Relocation of a **low** home to another location at the base of the slope
- 3) Relocation of a **high** home to another location at the top of the slope
- 4) Relocation of a **low** home to the top of the slope so that it becomes a **high** home
- 5) Relocation of a **high** home to the bottom of the slope so that it becomes a **low** home

Level properties are approximately 24.6% of SR-AL and 12.9% of the marine shoreline by length. The typical setback from OHWM is 41' to 90' and homes are currently generally towards the rear of the property with mature landscaping to OHWM. The homes within each segment tend to be developed at a consistent distance from OHWM which allows each home to enjoy an unhindered view; this tends to relieve some of the pressure that would cause homes to creep forward over time.

The shoreline buffer for this planning area is 45' deep. Although the SMP allows for new impervious surface within zone 2 of this buffer, the requirements for mitigation sequencing prefers that the adverse impact not be made. This indicates a preference not to relocate the structure to impose on the shoreline buffer at all. If the structure were to enter zone 2, there would be a requirement to mitigate the adverse impact with new native vegetation in zone 1 hence achieving No Net Loss.

Low properties are approximately 49.4% of SR-AL and 25.9% of the marine shoreline. The typical setback for these properties 20' to 50' i.e. the majority of the homes are already partially within the shoreline buffer. Further the home is typically a substantial fraction of the width of the property. This all but eliminates the pressure to relocation of a low home elsewhere at the base of the slope.

High properties are approximately 16.2% of SR-AL and 8.5% of the marine shoreline. There is generally relatively little space at the top of the slopes and so it is also unlikely that there much effort to relocate a home at the top of the slope to some other location at the top of the slope.

It is unlikely that many home owners will be inclined to relocate a home that is at the base of a steep slope to the top of the slope. However even if this were desired many of these homes could not be moved to the top of the slope due to property boundaries or a lack of space at the top of the slope.

It is to be expected that some of the owners of homes at the top of a steep slope would be interested in having homes at the base of a steep slope. These properties are heavily vegetated at the base of the slope and there is generally relatively little land available. The 45' shoreline buffer can be expected to eliminate this class of re-development without the use of a shoreline variance.

Expansion of existing structures

A consideration of the impact of expanding existing structures follows a similar pattern but with fewer combinations to consider.

The majority of homes on level ground are currently landward of the shoreline buffer. A significant fraction of these are unlikely to intrude on the buffer for typical levels of expansion. Expansion of the few homes that are currently close to the shoreline buffer might create new impervious surface in Zone 2 but this will trigger compensatory mitigation with a preference for restoration in Zone 1 to achieve no net loss.

A similar line of argument applies to homes that are located at the base of a steep slope. However the typical setback of these homes is currently 20' to 50' which means that many of these homes are already partially in Zone 2. Some expansion may occur, with compensatory mitigation as required, but the SMP will curtail this pattern of development.

The typical setback for the high homes is approximately 125' to 235' which means that expansion of these homes will be well outside shoreline jurisdiction.

Addition of new structures

The Supplement to the Shoreline Analysis and Characterization partitioned the developed properties into three broad categories; those on generally level ground, those that are developed at the base of a steep slope and generally towards OHWM, and those that are developed at the top of a steep slope towards the landward edge of Shoreline Jurisdiction.

The properties on level ground have typical setbacks of 41' to 90' and generally have little or no native vegetation. BMC 20.30.095 (2.g) explicitly disallows new accessory structures within the Shoreline Buffer i.e. within 45' of OHWM which will tend to leave very little space for new structures between the primary residence and OHWM. Most of the homes have garages on the landward side of the primary residence and this is the expected location for any new garages.

The properties at the base of the steep slopes have typical setbacks of 20' to 50' i.e. tend to overlap with the new Shoreline Buffer. There is therefore little opportunity to construct new accessory structures on the waterward side of the primary residence and little room for new structures between the primary structure and the slope. This will tend to force any new structures towards the top of the slope and, generally, towards the landward edge of Shoreline Jurisdiction.

Many of the properties that are developed at the top of the slope include accessory structures at the base of the slope and within the new Shoreline Buffer. BMC 20.30.095 (2.g) will prevent the creation of new accessory structures in this region.

Opportunities for Preservation

Ignoring the few small public street ends the shoreline properties in this planning area are privately owned. Ten properties, approximately 5.9% of this planning area by length or 3.1% of the marine shoreline, is undeveloped excluding the two community owned properties. These ten properties have been discussed in some detail in this report and it was noted that 8 of these are in a relatively natural condition. The public could consider seeking opportunities to purchase one or more of these properties and safeguard them from future development.

In addition there are a small number of developed properties with significant native vegetation that include a primary structure that is in a distressed condition. The public could choose to purchase some of these properties, remove the structure, and safeguard them from future development.

Focusing on preservation of these undeveloped or distressed properties may be more cost efficient than efforts to purchase developed properties and then restoring them to natural conditions.

4) Conclusion

This supplement has demonstrated that the update to the Burien SMP, as a package, meets the goals of the SMA and the requirements of the SMP Guidelines. The policies and regulations of Burien's SMP will assure No Net Loss from reasonably foreseeable future development.