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JUN 26 2012

CITY OF BURIEN

June 26, 2012

To the Burien Planning Commission;

Ever since the incorporation of the City of Burien in 1993, the residents of the Lake Burien Neighborhood have always requested and contended that the land use of the neighborhood should be low density because of the character of the neighborhood and for the protection of the critical areas. When this amendment for a change to the land use map was submitted in 2010, the majority of the residents (160+) of the neighborhood signed a petition again requesting that the Lake Burien Neighborhood be classified as low density land-use.

This amendment request was submitted in 2010 to resolve the inconsistencies in the 2009 Burien Comprehensive Plan between the plan text policies and the land use map for the Lake Burien Neighborhood and to provide protection for the critical areas in the Lake Burien Neighborhood. Since that time some conditions have markedly changed that warrant that this request be brought forward again. Those conditions will be discussed in item K of this amendment request. It is our understanding that these criteria might need to be reexamined and it is for this reason that this request to change to the Burien Comprehensive Plan Land Use Map has been resubmitted.

On July 12, 2011, the question was brought up before the Planning Commission about whether the Lake Burien Neighborhood Land Use Map Amendment could be considered again. Starting at 59:99 of the video tape of the July 12, 2011 Planning Commission meeting, Mr. Greenberg stated that this request could be reconsidered in the future if the growth management numbers could be accommodated under the GMA. In December, 2011, the Burien City Council had allowed 100+ housing units to be lost due to the Group Health expansion project and at that point determined that no other neighborhood would have to agree to make up these lost units because the city had a surplus of units to meet its GMA numbers. Back in 2010, the argument that the city staff had advanced was that if even one housing unit was lost, the Lake Burien Neighborhood amendment did not meet Criteria J and could not be allowed to be passed/approved. At the January 24, 2012 Burien Planning Commission Meeting starting at 1:08:32 of the video tape, Mr. Greenberg discussed that the way that the city had interpreted the GMA numbers for requests for changes to the Comprehensive Plan was going to be redefined. Furthermore in 2010, the City Council referred to a case that they claimed was argued before the Growth Management Board that required that Burien change its Comprehensive Plan and map in 1999. Based on that 1999 case, the City Council denied the amendment for the map change. However, the Growth Management Board has confirmed that there was no sure case in 1999 and therefore, the Growth Management Board had not made any such ruling. Additionally, other documents and sources of information have been revised, updated or newly developed by the city that warrants a reconsideration of this request.

When this request was put on the docket in 2010, the City Staff that prepared the material for the request presentation to the Planning Commission included several inaccuracies in their presentation that resulted in an inaccurate perception of the situation. These inaccuracies included:

1. Current density of land use
2. Misinformation on wetlands and how they are measured

3. An inaccurate map of the Lake Burien Neighborhood, Lake Burien and its critical areas
4. Misinterpretation of how Growth Management Numbers are required for a city by the Puget Sound Regional Council
5. Error in not consulting the EIS and the required mitigations for the Lake Burien Area
6. Inaccurate information on the surrounding neighborhood
7. Misinformation on the adequacy of the current facilities that the city has for the area.
8. Water qualities in the lake deteriorating due to the inadequacy of the storm water management facilities that currently exist.

Again, we would like to restate that since that time several things/sources of information have changed that warrant the reconsideration of this request-the new Drainage Master Plan, the new Best Available Science (BAS) document and decisions reached by the city staff and the Burien City Council.

We are requesting that this request for a change to the Comprehensive Plan Land Use Map be put on the docket for consideration. As most of the work has been done on this issue previously, there is little to not cost to the city for its consideration.

Sincerely,  
Robert Howell and the Lake Burien Neighborhood

To: The City of Burien Planning Commission  
Subject: Change to the Burien Comprehensive Plan Land Use Map  
From: C. Edgar and the Lake Burien Neighborhood  
Date: June 26, 2012

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#### Recent History-

Ever since the incorporation of the City of Burien in 1993, the residents of the Lake Burien Neighborhood have always requested and contended that the land use of the neighborhood should be low density because of the character of the neighborhood and for the protection of the critical areas. When this amendment for a change to the land use map was submitted in 2010, the majority of the residents (160+) of the neighborhood signed a petition again requesting that the Lake Burien Neighborhood be classified as low density land-use.

This amendment request was submitted in 2010 to resolve the inconsistencies in the 2009 Burien Comprehensive Plan between the plan text policies and the land use map for the Lake Burien Neighborhood and to provide protection for the critical areas in the Lake Burien Neighborhood. Since that time some conditions have markedly changed that warrant that this request be brought forward again. Those conditions will be discussed in item K of this amendment request. It is our understanding that these criteria might need to be reexamined and it is for this reason that this request to change to the Burien Comprehensive Plan Land Use Map has been resubmitted.

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## **Burien Municipal Plan Amendment Criteria**

The following series of responses will follow the list of criteria as documented in the **Burien Municipal Code, 19.65.095 Comprehensive Plan Amendments, Item 4. Criteria** (Page 65-21 & 65-22).

### **A. The request has been filed in a timely manner.**

A citizen letter was sent to the Burien Planning Commission requesting that this item be added to the 2012 Comprehensive Plan docket for a change to the Comprehensive Land Use Map for the Lake Burien Neighborhood. The request was submitted in a timely manner as verified by Scott Greenberg/Burien Director of Growth and Development.

### **B. There is a public need for the proposed amendment.**

Under RCW 36.70A, there is a requirement for consistency throughout the comprehensive plan text and maps as well as protections for Critical Areas. There is a public need for this proposed amendment because the policies stated in the **2009 Burien Comprehensive Plan, 2.2 LAND USE ELEMENT, Residential Neighborhoods, Goal RE.1, Pol. RE 1.5** (page 2-8) do not appear to be consistent with the Comprehensive Plan Land Use Map for the Lake Burien neighborhood. As a result of these inconsistencies, there appears to be a disregard for the protections of Critical Areas as required by RCW 36.70A (The Growth Management Act). The protection of critical areas and the need for lower density land use is recognized in sections **RCW 36.70A.020, 36.70A.060, 36.70A.170, 36.70A.172, 36.70A.175 and 36.70A.480**. The **King County Comprehensive Plan**, which serves to guide County-wide Planning Policies, recognizes the importance of Critical Areas in **Chapter1-Regional Planning and Chapter4-Environment**. The **2011 Burien Comprehensive Plan, 2.2 LAND USE ELEMENT, Natural Environment, Wetlands, Goal EV.6, Pol. EV 6.1** (page 2-33) states: *“The City shall protect its wetlands with an objective of no overall net-loss of functions and values.”*

Also, the **2011 Burien Comprehensive Plan, 2.2 LAND USE ELEMENT, Land Use Conflicts, Pol. PI 1.6** (page 2-39) states: *“If there is a conflict between the comprehensive plan land use map and the land use designation policies, the land use designation policies control.”*

In all of the previously mentioned documents, the requirement of Best Available Science is required when dealing with Critical Areas. In a review of the Best Available Science for protecting, saving wetlands and other critical areas, the following strategies were cited:

1. limiting uses,
2. avoiding development in some areas,
3. transferring development density to another site, and
4. public protection of the critical area as a valuable site  
(MRSC-Best Available Science-Critical Areas, 4/10).

While buffers and mitigation have been strategies used to protect wetlands and critical areas, they have been proven not adequate to prevent “no net loss” to these critical areas (King County website, PSWSMRP, “Wetlands and Urbanization”, Azous and Horner, 1997) . Pollutants reach wetlands mainly through runoff (PSWQA 1986; Stockdale 1991). Urbanization of wetlands and the watersheds that feed wetlands generate large amount of pollutants such as eroded soils from

construction sites, toxic metals and petroleum wastes from roadways and nutrients and bacteria from residential areas. *“At the same time that urbanization produces larger quantities of pollutants, it reduces water infiltration capacity, yielding more surface runoff.”* (Loucks 1989; Canning 1988). Additionally, residential development and the increased human usage of the land results in a significant impact to a critical area wetland and causes net loss. Increased amounts of impervious surface in residential areas on or adjacent to critical areas causes damage to wetlands, aquifer recharge areas and water quality. The currently released October, 2011 City of Burien Best Available Science Review states: *“Urbanization typically alters wetland hydrology by increasing or decreasing flows that enter the wetland from the surrounding landscape”* (page 37) and that *“...buffers are not likely to protect a wetland’s hydroperiod if they are located in a basin with impervious surface exceeding 15 percent.”* (page 38). *“...[A]erial photos clearly show impervious cover well over the 15 percent threshold, particularly in the Miller Creek basin.”* (page 38). The Lake Burien Neighborhood is located within the Miller Creek basin.

Therefore, another critical strategy that should be employed in the protection of urbanized critical areas and wetlands is to keep the land use of these areas at low density usage. This concept of low density usage is supported by the **2009 Burien Comprehensive Plan, 2.2 LAND USE ELEMENT, Residential Neighborhoods, Goal RE.1, Pol. RE 1.5, Low Density Neighborhood** (page 2-8) and should be reflected by land use designations at *“4 units per acre or less, due to the constraints posed by critical areas.”*

Additionally, under the Public Trust Doctrine, the water quality and the environmental preservation are considered as valid public trust issue. This is a simple but powerful legal concept that obliges all levels of government to manage natural resources in the best interest of their citizens, without sacrificing the needs of future generations (Science Daily, April 13, 2009). As a legal concept, it is well established in the United States at the state level and in federal agencies. Lake Burien is a critical area that falls under the domain of the Public Trust Doctrine.

In Chapter 5 (EIS) of the current Burien Comprehensive Plan, the Preferred Model that is discussed for land use is the low density land-use model, the No Action Model is the model that would retain the King County land use density that existed prior to the city incorporating. The other models mentioned are some variation on moderate to high density land use. (Chapter 5, 5-19 through 5-26). Environmentally sensitive areas (Chapter 1, 1-20) that are discussed in the document were later also referred to as critical areas.

Starting on page 5-26 of Chapter 5 titled 5.2.9 Environmental Analysis of the Alternatives, the impacts of each of the alternatives is discussed and the required Mitigating Measures are noted. Under Streams and Lakes (page 5-30), the Mitigating Measures call for low density in *“...the areas immediately abutting Lake Burien...”*. Under the topic of Wetlands, the Mitigating Measures are to use the Preferred Model to bolster the protection of wetlands. Lastly, under Surface Water Resources (page 5-29) of the Mitigating Measures, the Preferred Model is selected to reduce the *“...significant adverse impact on the management of storm water impacts within this basin.”* For these reasons, the Lake Burien Neighborhood was put into the Burien Comprehensive Plan as low density residential land-use. These portions of the EIS still remain effect in the 2011 Comprehensive Plan and as such should remain honored by the Land Use Map to ensure the consistency of the two documents.

The protection of the natural environment, water quality, critical areas and consistency in the comprehensive plan are well documented public needs.

C. The proposed amendment is the best means for meeting the identified public need.

The proposed amendment is the best means for meeting this identified public need of creating consistency throughout the comprehensive plan and maps and for protection of critical areas because land use is controlled by policy and map designation in the Comprehensive Plan. Additionally, this is the only legal mechanism for creating plan consistency and for maintaining low density residential development in a critical area such as the Lake Burien Neighborhood.

D. The proposed amendment is consistent with the overall intent of the goals and policies of the Burien Comprehensive Plan, Growth Management Act and Countrywide Planning Policies.

The proposed amendment is in agreement with the 2009 Burien Comprehensive Plan, Chapter 2:

A) 2.2 LAND USE ELEMENT:

- 1) Residential Neighborhoods, Goal RE.1, Pol. RE 1.5, Pol. RE 1.6
- 2) Natural Environment, Goal EV.1, Pol. EV 1.2, EV 1.8, Goal EV. 2, Goal EV.4, Goal EV.5, Goal EV.6, Pol. EV 6.1
- 3) Land Use Plan Implementation, Goal PI.1, Pol. PI 1.1, Pol. PI 1.2, Pol 1.5
- 4) Land Use Conflicts, Pol. PI 1.6
- 5) Phasing Uses and Densities, Goal PH.1, Pol. PH 1.1

B) 2.8 STORM WATER ELEMENT:

- 1) Protecting Water Quality, Goal ST.1, Pol. ST 1.10

The proposed amendment is in agreement with the Growth Management Act/RCW 36.70A:

- 1) Planning goals, 36.70A.020
- 2) Definitions, 36.70A.030
- 2) Natural resources and critical areas, 36.70A.060
- 3) Comprehensive plans-Mandatory elements, 36.70A.070
- 4) Natural resource lands and critical areas, 36.70A.170
- 5) Critical areas-Designation and protection-Best available science to be used, 36.70A.172
- 6) Wetlands to be delineated in accordance with manual, 36.70A.175
- 7) Shorelines of the state, 36.70A.480

The proposed amendment is in agreement with King County Countywide Planning Policies:

- 1) Chapter 1-Regional Planning
- 2) Chapter 4-Environment

The Puget Sound Regional Council has recently released its Vision 2040 which includes an increased emphasis on environment protections.

E. The proposed amendment will result in a net benefit to the community.

The proposed amendment will result in a net benefit to the community by having a Comprehensive Plan that is internally consistent in both text and maps. The **2009 Burien Comprehensive Plan, 2.2 LAND USE ELEMENT, Land Use Plan Implementation, Goal PI.1, Pol. PI 1.1** (page 2-37) states: *“The Comprehensive Plan, development regulations, function plans and budgets should be mutually consistent and reinforce each other.”*

**Goal PI.1, Pol. PI 1.2** (page 2-37) states: *“The City’s development regulations should be consistent with other City plans and activities, including other development requirements. Development regulations shall be clearly written and absent of duplicative, uncoordinated or unclear requirements.”*

Burien citizens and City staff who use the Burien Comprehensive Plan will not be confused by internal inconsistencies. Other city plans, development regulations, functional plans and budgets will also be consistent. In addition, the protection of the water quality, natural environment and critical areas in this part of the city will benefit the whole community and the State of Washington in its salmon recovery efforts. The waters from Lake Burien and its wetlands drain into Miller Creek which is a salmon producing creek.

The October, 2011 City of Burien Best Available Science Review addresses the issue of water quality and the types of buffers that are required to reduce the various kinds of pollutants that affect water quality (page 43).

F. The revised Comprehensive Plan will be internally consistent.

The revised Comprehensive Plan will be internally consistent because it appears to be inconsistent without this change. It will also be in compliance with the Washington State Growth Management Act (**RCW 36.70A.070 Comprehensive plans – Mandatory elements**) which mandates that a Comprehensive Plan *“...shall be an internally consistent document and all elements shall be consistent with the future land use map.”* Additionally, Chapter 5 of the Burien Comprehensive Plans requires that land-use density in the Lake Burien Neighborhood be kept low density for the protection of the critical areas per the requirements of Best Available Science.

G. The capability of the land can support the projected land use.

Best Available Science suggests that the carrying capacity of the properties around Lake Burien would not be negatively impacted if the properties are designated as *“Low Density Residential Neighborhood”*. This amendment reduces the current proposed density and land-use designation demands on the critical areas of the Lake Burien Neighborhood.

H. Adequate public facility capacity to support the projected land use exists.

**RCW 36.70A.030 Definitions (12)** states: *“‘Public facilities’ include streets, roads, highways, sidewalks, street and road lighting systems, traffic signals, domestic water systems, storm and sanitary sewer systems, parks and recreational facilities, and schools.”* This public facility capacity and infrastructure already exist to support the projected land use of *“Low Density Residential Neighborhood”*. However, based on the city’s May, 2012 Drainage Master Plan, the storm water facilities in the Lake Burien Neighborhood are inadequate to handle storm water as has been demonstrated in the recent past and there appears to be no funding in the next 5-10 years to correct these inadequate facilities. Additionally, there are no future plans to require Low Impact Development (LID) in the Lake Burien Neighborhood or in its watershed in the next 5-10 years, as stated in the Drainage Master Plan.

The city does have the resources to support the change to low density land use by simply making the required change to the land use map, doing mailings to impacted residents and the staff time

involved in the cost of implementing this amendment. The city also has mechanisms in place to do these clerical items in a low cost effective manner.

I. The proposed amendment will be compatible with nearby uses.

The proposed amendment will be compatible with nearby uses which are mainly residential. The Lake Burien Neighborhood is adjacent to the Seahurst Neighborhood on two sides. The Seahurst Neighborhood is low density residential. The amendment will simply reduce density in an already residential neighborhood. The area to be changed on the map is currently adjacent to properties already classified as a “*Low Density Residential Neighborhood*”. The amendment will simply resolve an internal inconsistency on a map for a residential neighborhood that is currently defined classifiable as a “*Low Density Residential Neighborhood*” by 2011 Comprehensive Plan policy text and will protect the critical areas of the Lake Burien Neighborhood which was intended and is still intended in the language of the EIS/Chapter 5 of the Burien Comprehensive Plan.

J. The proposed amendment would not result in the loss of capacity to meet other needed land uses such as housing.

The city staff noted in report on the 2010 request for a Change to the Land Use Map that this request would result in the loss of less than 20 units, this is not a significant loss as compared to the units lost as a result of the decision on the Group Health Project in 2011 and the revised position stated at the January 24, 2012 Planning Commission meeting. Burien has more than a sufficient amount of units to allow this amendment to pass and still meet its GMA numbers. Therefore, this proposed amendment would not result in the loss of capacity to meet other land uses such as housing.

K. For a Comprehensive Plan Map change, either of the two following are met:

i. Conditions have so markedly changed....

The following items and conditions have changed that warrant a re-examination of the land-use density of the Lake Burien Neighborhood:

1. Methodology for meeting the Puget Sound Regional Council Growth Management policy for calculating the capacity to meet other needed land uses such as housing.
2. City of Burien’s commissioned October, 2011 Drainage Master Plan.
3. City of Burien’s commissioned May 2012 Best Available Science Review for the Burien Comprehensive Plan Update.
4. Vision 2040 increased focus on environmental protection.

Also, when this request was put on the docket in 2010, the City Staff that prepared the material for the request presentation to the Planning Commission included several inaccuracies in their presentation that resulted in an inaccurate perception of the situation. These inaccuracies included:

1. Current density of land use
2. Misinformation on wetlands and how they are measured
3. An inaccurate map of the Lake Burien Neighborhood, Lake Burien and its critical areas

4. Misinterpretation of how Growth Management Numbers are required for a city by the Puget Sound Regional Council
5. Error in not consulting the EIS and the required mitigations for the Lake Burien Area
6. Inaccurate information on the surrounding neighborhoods
7. Misinformation on the adequacy of the current facilities that the city has for the area.
8. Water qualities in the lake deteriorating due to the inadequacy of the storm water management facilities that currently exist.

ii. The map change will correct a Comprehensive Plan designation that was inappropriate when established.

Since this is a 2012 Comprehensive Plan map change, the applicable designation criteria are met because a map change will correct an inconsistency between the 2011 Comprehensive Plan policy text and 2011 Comprehensive Plan map. The 2013 Burien Comprehensive Plan will also be in compliance with the Washington State Growth Management Act (**RCW 36.70A.070 Comprehensive plans – Mandatory elements**) which mandates that a Comprehensive Plan “...shall be an internally consistent document and all elements shall be consistent with the future land use map.” Also this change will correct the inconsistency between the land use map and Chapter 5 (EIS) stated mitigations that were required to be in place and are still required to be in place for the adoption of the current Burien Comprehensive Plan.

**Sources/References used in the preparation of the 2012 Burien Comprehensive Plan amendment request**

Burien Municipal Code 18.60.020, 18.60.310

Burien Comprehensive Plan, (2009, 2011)

City of Burien Map Collections (2009, 2012)

City of Burien records on Comprehensive Plan, (1996 – 1999)

Comprehensive Plan Update, Best Available Science Review, October, 2011.

Cooke, Sarah Spear, “*Review for the City of Burien’s Draft SMP.....*”, (March 23, 2010)

Grette Associates, Shoreline Analysis and Characterizations, (June 12, 2006, revised October 23, 2008)

Grette Associates, Shoreline Inventory, (March 27, 2008, revised October 23, 2008)

Herrera Environmental Consultants, “*Data Analysis Report: Lake Burien, Washington*”, (March 16, 2010) Zisset, Rob

Herra Environmental Consultants, .....2010

King County Comprehensive Plan, (2008)

King County Land records, maps and interview with the King County Maps Manager, 2010.

Letter to City of Burien Council members, John Wozniak, President, Lake Burien Shore Club, (October 30, 1997)

MRSC - Best Available Science - Critical Areas, online, (April 2010)

PSWSMRO, “Wetlands and Urbanization”, (Azous and Horner, 1997)

Revised Code of Washington (RCW), RCW 36.70A

Recommendations on Making Small Shoreline Buffers Work with Buffer Science, (March 2010)

“Science daily”, (April 13, 2009)

“The Public Trust Doctrine and Coastal Zone Management in Washington State”, Washington state Department of Ecology, (October 1991)

Whidbey Environmental Action Network v. Island County, (June 4, 2004)

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CITY OF BURIEN

March 14, 2010

To: Mike Martin, City Manager (email: [mikem@burienwa.gov](mailto:mikem@burienwa.gov))  
City of Burien

cc: David Johanson, Senior Planner (email: [davidj@burienwa.gov](mailto:davidj@burienwa.gov))  
City of Burien

cc: Dave Upthegrove, Chair, Parks & Natural Resources  
(email: [Upthegrove.dave@leg.wa.gov](mailto:Upthegrove.dave@leg.wa.gov))  
Washington State House of Representatives

cc: Ted Sturdevant, Director (email: [ted.sturdevant@ecy.wa.gov](mailto:ted.sturdevant@ecy.wa.gov))  
Department of Ecology

From: John Upthegrove  
1808 SW 156<sup>th</sup> St., Burien, WA 98166 (email: [cyndiu@comcast.net](mailto:cyndiu@comcast.net))

Re: Draft Shoreline Management Plan

Gentlemen,

At the Tuesday, March 9<sup>th</sup> Planning Commission meeting it was apparent that the Shoreline Management Plan language comes primarily from the City of Burien Comprehensive Plan. However, you seem to have overlooked an item in the Comprehensive Plan that belongs in the Shoreline Management Plan.

In chapter 2 page 23 (2-23) of the Comprehensive Plan, under Special Planning Area 2, the following text states:

Pol. SE 1.3

Special Planning Area 2 includes the existing Ruth Dykeman Children's Center facilities on Lake Burien. While the City encourages and supports the continued operation of the Center, any proposed change in use in the future should be reviewed to ensure that:

- a. Public access to the water is prohibited: and
- b. The development supports the historical link with Old Burien.

While the Ruth Dykeman Children's Center continues to operate a children's center on the site, residential, office and accessory uses associated with the center should be allowed. Minor expansion and modification of the children's center uses and structures should be allowed, if consistent with a City-approved Master Plan for the property.

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In order to maintain consistency, this language should be inserted in the Shoreline Management Plan. It obviously applies, and without it one gets the impression that the city is "cherry-picking" for the new Shoreline Management Plan.

Please make this letter and request a part of the public record.

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**MOTION**

The Burien Planning Commission recommends the following amendment to the existing 2011-2012 work docket: Add

**A citizen-proposed amendment to the Comprehensive Plan Land Use Map, and**

The results of any vote on this Motion will be forwarded to the Burien City Council.

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This amendment to the land use map should be considered because of a number of changes that have occurred in the past two years, including:

1. The now existing surplus of housing units required by the Growth Management Act.
2. The language in the newly acquired Best Available Science report.
3. The proposed changes to the Storm Water Drainage Master Plan.
4. The City of Burien's new visioning process has produced a new focus on environmental protection.

A discussion of the requested amendment may be limited due to budget constraints and time, as mutually agreed to between the Planning Commission and the planning staff.