

Friends of Pine Lake

June 3, 2013

Esteemed Council members:

Friends of Pine Lake is a non-profit established in 1998 with the mission to provide protections to the waters of the city, including wetlands, streams and lakes.

In reviewing the ^{decision table} ~~matrix~~ presented by staff we were surprised to see that there was no response by staff to comments presented by environmental organizations such as Save Lake Sammamish and Friends of Pine Lake. Our organizations have deep knowledge of the history and policies you are considering yet there is no review of our comments.

The current ECA ordinance is a series of carefully balanced regulations that a governing entity must consider. There are the physical risks, financial risks, legal risks and long-term costs of maintenance and administration and protections of health and safety of all the citizens.

In reviewing the marked ordinance we can't help but notice that language has been added suggested by citizens, but it is not necessary and can lead to unintended consequences.

The manual change for wetland delineations that has been inserted is of major concern to us. Using the Federal 1987 Wetland Delineation Manual is not the BAS anymore. King County's scientific work in the 1990's led to updates and improved knowledge for wetland functions, and the impacts of urbanization. Many of the findings of that study are being used nationally, so therefore we request that you return to the WA State Wetlands Delineation Manual. We also oppose the change in 21A.50.300 (7). Additionally (7) a. should read "...if the discharge does not impact the hydro-period of the wetland". In order for this to be of any relevance, baseline monitoring for a full wet season should be required.

We continue to oppose the pilot programs and the subdividing of properties in the NO DISTURBANCE AREAS. We support Councilmember Vance's proposal to prohibit them and to down-zone to R-1 and allow transfer of density. R-1 properties are required to

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leave 50% open space and that will require forest retention and vegetation management, which is critical on these slopes.

We further propose that during the Comprehensive Plan update, you eliminate the ability to increase impervious surfaces on an R-4 lot or R-6 lot to the next higher density for small lots, and also consider a minimum lot standard. This will eliminate full coverage of the lot and will allow for vegetation requirements especially on steep slopes.

We respectfully request that the Council take a couple of months to read and fully understand the materials before deliberating. The impacts of these changes will have long-term consequences, and you must fully understand the impacts of any of the proposed changes.

Thank you

Erica Tiliacos