Mayor Lee and Members Bellevue City Council Bellevue WA

RE: Shoreline Management Plan Update

The purpose of this document and its accompanying CD is to provide the Council readily accessible information relevant to the SMP. This information was provided to the City Planning Commission during its development of the draft now before the Council.

Background Document¹ - This document summarizes WSSA's key issues and findings in the SMP update process. We found it essential that it be prepared and submitted to the record of proceedings so that the points WSSA made and information provided to the Commission were located in one document.

Fish Science Compendium - This is a synopsis of Dr. Gil Pauley's findings in his review of City shoreline studies. Consultants' and staffs' "science" asserted shorelines are critical areas due to endangered fish. Professor Pauley provided his original input in 2010 at a public forum sponsored by WSSA. His review not only oriented attendees to the fisheries present in area lakes and threats to them, but he also found numerous deficiencies within the studies and conclusions drawn from them.

Sensible Shoreline Plan - Also prepared several years ago, the intent of this early plan was to reflect a viable alternative to what staff was proposing. While not the plan currently in draft status, it demonstrates feasible alternatives and the breadth of local discretion available under existing State codes.

Supporting Code Citations – Development of WSSA initial Sensible Shoreline Plan required an awareness of the Shoreline Management Act and supporting documents. This citations document provides an annotated list of these "enabling" regulations.

Shoreline Urbanization Analysis – Under Dept. of Ecology guidance, Bellevue staff and consultants concentrated shoreline analysis on four ecological functions. No consideration was given to the degree to which shorelines had been legally developed, thus reducing the likelihood of their restoration. The urbanization analysis found that over 90% of Bellevue's residential shoreline has been built out.

Tree Canopy Study – The City inventory reports concluded there is a great need for trees to be placed on Bellevue's lake shorelines. Shading and creation of large woody debris along lake edges were among the reasons promoting this. Using aerial photos and a study conducted of Bellevue by the national firm "American Forests", this document demonstrates that shoreline properties have been exemplary in tree retention. WSSA has also pointed out the liability that would be created by requiring tree placement in a zone whose conditions would create safety problems should they fall.

Lake Water Level Impacts – Lake Sammamish and Phantom Lake have man-made structures which, if inappropriately managed will impact lake water levels. This report and others which clearly identified deferred County maintenance as the cause of altered Ordinary High Water levels on Lake Sammamish.

¹ Folders on the CD are named in a similar manner and contain the relevant document in PDF format. July 22_2013_WSSA_Resource_CD.doc

It should be noted, however, that complete removal of blocking sediment and debris may not occur for 2 to 5 years!

Land Value & Tax Base Implications – WSSA found little attention in the SMP update process being given the question – "How will regulations placed on a subset of residential properties impact their value?" The paper provided here describes the long term impacts and it should be noted that separate communication with the author verified WSSA's concern that localized, short term effects could include dramatic reduction in marketability of residential property.

Restoration Plan – The draft SMP came to the City Council without substantive input by the Planning Commission on the non-regulatory/programmatic portion. The report provided here details WSSA's recommended changes to staffs' draft as it was submitted to the Planning Commission. For a number of reasons the Commission did not consider WSSA's suggestions, and felt it could not commit the Council to program specifics, especially where they involve programs away from the shoreline.

Critique of Public Hearing Draft – While the SMP draft before the Council has changed since the Public Hearing in May 2010, many of the critique points submitted by WSSA remain pertinent to the process. This document reflects the level of detail, points of advice, suggestions, and guidance provided by WSSA.

CLOSURE

Should there be any questions or need for supplemental information, please contact us.

Respectfully,

Martin Nizlek, PhD

For WA Sensible Shorelines Association

Washington