

**From:** [Thurston County | Send Email](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** Shoreline Master Program  
**Date:** Sunday, October 17, 2021 2:44:24 PM

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This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Andrew Deffobis**

Subject:

From: **Richard J. Davis**

Email (if provided): **wsba12481@comcast.net**

Phone: (if provided): **(360) 584-8293**

Message:

**Your new plan achieves the required environmental protections without undue burdens to property owners. The county appears to be moving in the right direction, with meaningful and necessary rules while eliminating unduly burdensome ordinances. That makes sense. Keep up the good work.**

**From:** [Robin Courts](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** FW: SMP comment  
**Date:** Monday, October 18, 2021 8:41:41 AM  
**Attachments:** [SMP comment 10-15-21 Commissioner Edwards; Thurston Environmental Community Stakeholders.docx](#)

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Hi Andy,

Commissioner Edwards received the attached comment re: the SMP. Would you please add it to the file of public comment?

Thanks much.

Best,  
Robin

Robin A. Courts  
Commissioner's Executive Aide | District #2  
Commissioner Gary Edwards Office  
2000 Lakeridge Drive SW., Olympia WA 98502  
[robin.courts@co.thurston.wa.us](mailto:robin.courts@co.thurston.wa.us)  
(360) 786-5747 office | (360) 239-7261 cell

-----Original Message-----

From: Anne Van Sweringen <[avansw2@gmail.com](mailto:avansw2@gmail.com)>  
Sent: Monday, October 18, 2021 4:12 AM  
To: Gary Edwards <[gary.edwards@co.thurston.wa.us](mailto:gary.edwards@co.thurston.wa.us)>  
Subject: SMP comment

Dear Commissioner Edwards,

Please accept the attached comment regarding the Thurston County Draft Shoreline Master Program Update.

Thank you,  
Anne Van Sweringen  
Representative, Thurston Environmental Community Stakeholders

## **Thurston Environmental Community Stakeholders**

**Black Hills Audubon Society, Sierra Club South Sound, Thurston League of Women Voters, Thurston Climate Action Team, and Thurston Environmental Voters**

Honorable Gary Edwards  
Commissioner District 2  
Thurston County Board of County Commissioners

October 15, 2021

Dear Commissioner,

As representative of the five Thurston County nonprofit organizations listed above, I would like to send the following comment to you for the upcoming Board of County Commissioners review of the Shoreline Master Plan Update:

**Marine Resources Committee** – Consider establishing a Thurston County Marine Resources Committee. Josh Cummings, CPED, suggested I contact you. The committee would act as a citizens advisory group that would work closely with state and local officials, while promoting public outreach and education. Clallam, Jefferson, San Juan, Snohomish, Grays, and Island counties all have established MRCs.

The mission of the MRC would be to address, using sound science, the needs of Thurston County's marine ecosystem. The MRC's focus would be to make recommendations on restoring and protecting county marine ecosystems, their ecological functions, and natural resources. The MRC's job would be to coordinate efforts to implement restoration and conservation projects, and to educate the public.

With climate change, sea level rise, and increased population growth in the forefront of many county shoreline issues, we believe the time is right for a Marine Resources Committee.

Respectfully submitted,

Anne Van Sweringen, Representative  
Thurston Environmental Community Stakeholders

**From:** [Thurston County | Send Email](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** Shoreline Master Plan  
**Date:** Monday, October 18, 2021 10:42:25 AM

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This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Andrew Deffobis**

Subject:

From: **Cj REusso**

Email (if provided): **cjrusso222+tcplanning@gmail.com**

Phone: (if provided): **3604026285**

Message:

**Hi Andrew, Please contact me asap about the shoreline designation change at 401 Summit Lake Shore Rd NW. It appears that of the 350+ properties on the lake, only my property and my neighbor's property will have a more restrictive designation. This is not reasonable. Please inform me about how I can keep this from occurring. Thanks, Cj Russo**

**From:** [jan.tveten](#)  
**Cc:** [Andrew Deffobis](#)  
**Subject:** SMA ORDINANCE COMMENT  
**Date:** Monday, October 18, 2021 11:06:53 AM

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Hi Andrew;

What is the basis for the shoreline set-back. Through out the state it varies, why?  
Just because you can, or is it something scientific about it?

Jan Tveten

Sent from my iPad

**From:** [Phyllis Farrell](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** SMP  
**Date:** Monday, October 18, 2021 2:09:38 PM

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Greetings Andy, hope you are well. Thank you for all the hard work you are doing on updating the SMP

I have seen several references to the Cumulative Impacts Analysis and No Net Loss Report...can those be made available?

Some time ago, I asked (and I know you were busy) if we had data on the number of exemptions and variances over the past few years.

Also, do you have the number of permit compliance visits, violations and penalties? I know the County is short staffed and monitoring and compliance are issues...I would like some documentation to advocate for more funding for these activities.

Also, I noticed in the draft SMP on line ...in the section on buffers there is an option to advocate for the 1990 buffer widths, but I see only Option A and B in the documents for the Open House.

Thanks

Phyllis

Sent from [Outlook](#)

**From:** [Thurston County | Send Email](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** Shoreline Management Program  
**Date:** Monday, October 18, 2021 2:44:25 PM

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This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Andrew Deffobis**

Subject:

From: **Barbara Chambers**

Email (if provided): **bac007@comcast.net**

Phone: (if provided): **206-304-1929**

Message:

**Hi Andy. I spoke with you about the SMP a couple of weeks ago, and you encouraged me to submit my comments directly to you if I was not able to attend the public hearing. While I believe that SMP is well thought out and has potential, what I do not like is that the SMP appears to illegally seize private property by changing rural shoreline properties to RURAL CONSERVANCY land. This new Conservancy land has been "created" by expanding our buffer zone of 50' to 150'-250'. Property owners will be prohibited and/or regulated to death for any property improvements in this proposal. The County already revalues our properties upwards on an annual basis significantly increasing our property taxes. Now this? If this is pushed through, than the County should remove the property tax that we are paying on any land that is "seized" under the guise of waterway protections. I for one am very meticulous on how my "shoreline" land is used primarily because I own high bank waterfront, and am very concerned with natural occurring sloughing and slides. Please come up with regulations that are citizen friendly, and do not keep increasing our expenditures. If you all have identified some rotten eggs that are misusing shoreline property, than focus on those folks. Thank you for your consideration. I do appreciate the opportunity to comment and your dedication to your job.**

**From:** [Thomasina Cooper](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** FW: SMP comment  
**Date:** Monday, October 18, 2021 3:38:58 PM  
**Attachments:** [BoCC comment 10-15-21 Commissioner Menser, Thurston Environmental Community Stakeholders.docx](#)

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Hi Andy-  
Hope you are well!

Attached is a letter about the SMP received from resident Anne Van Swernigen. Please add to the record, if it's not already there.

Thanks bunches!  
Thomasina

-----Original Message-----

From: Anne Van Sweringen <[avansw2@gmail.com](mailto:avansw2@gmail.com)>  
Sent: Monday, October 18, 2021 3:31 PM  
To: Tye Menser <[tye.menser@co.thurston.wa.us](mailto:tye.menser@co.thurston.wa.us)>  
Subject: SMP comment

Dear Commissioner Menser,

Please accept the attached comment regarding the Thurston County Draft Shoreline Master Program Update.

Thank you,

Anne Van Sweringen  
Representative, Thurston Environmental Community Stakeholders



## **Thurston Environmental Community Stakeholders**

**Black Hills Audubon Society, Sierra Club South Sound, Thurston League of Women Voters, Thurston Climate Action Team, and Thurston Environmental Voters**

Honorable Tye Menser  
Commissioner District 3  
Thurston County Board of County Commissioners

October 15, 2021

Dear Commissioner,

As representative of the five Thurston County nonprofit organizations listed above, I would like to send the following comment to you for the upcoming Board of County Commissioners review of the Shoreline Master Plan Update:

**Marine Resources Committee** – Consider establishing a Thurston County Marine Resources Committee. Josh Cummings, CPED, suggested I contact you. The committee would act as a citizens advisory group that would work closely with state and local officials, while promoting public outreach and education. Clallam, Jefferson, San Juan, Snohomish, Grays, and Island counties all have established MRCs.

The mission of the MRC would be to address, using sound science, the needs of Thurston County's marine ecosystem. The MRC's focus would be to make recommendations on restoring and protecting county marine ecosystems, their ecological functions, and natural resources. The MRC's job would be to coordinate efforts to implement restoration and conservation projects, and to educate the public.

With climate change, sea level rise, and increased population growth in the forefront of many county shoreline issues, we believe the time is right for a Marine Resources Committee.

Respectfully submitted,

Anne Van Sweringen, Representative  
Thurston Environmental Community Stakeholders

**From:** [Larry Schaffner](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** FW: SSWAB  
**Date:** Monday, October 18, 2021 3:52:11 PM

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Hi Andy,

Just passing along feedback (**highlighted in yellow below**) on the SMP from one of our SSWAB members.

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**From:** Larry Schaffner  
**Sent:** Monday, October 18, 2021 3:51 PM  
**To:** Phyllis Farrell <[phyllisfarrell681@hotmail.com](mailto:phyllisfarrell681@hotmail.com)>  
**Cc:** Paula Holroyde <[paulaholroyde@lwvthurston.org](mailto:paulaholroyde@lwvthurston.org)>; Casey Kramer <[ckramer@naturalwaters.design](mailto:ckramer@naturalwaters.design)>; Simmons, Jaclynn <[simmojac@oregonstate.edu](mailto:simmojac@oregonstate.edu)>; Nancy Winters <[wintersnl@comcast.net](mailto:wintersnl@comcast.net)>  
**Subject:** RE: SSWAB

Hi Phyllis,

Thanks for passing along your thoughts on the Shorelines Master Program. I'll share them with our lead staff person on that project.

Regarding the Rochester retrofit project, that project was inspired by a field trip I took staff to see what great work was occurring in Kitsap County, particularly the [Manchester Project](#).

Larry Schaffner | Thurston County Stormwater Program Coordinator  
 2000 Lakeridge Dr. SW | Bldg. 4, Rm. 100 | Olympia, WA 98502  
 360-754-4106 | [www.thurstoncountywa.gov/sw](http://www.thurstoncountywa.gov/sw)

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**From:** Phyllis Farrell <[phyllisfarrell681@hotmail.com](mailto:phyllisfarrell681@hotmail.com)>  
**Sent:** Monday, October 18, 2021 3:16 PM  
**To:** Larry Schaffner <[larry.schaffner@co.thurston.wa.us](mailto:larry.schaffner@co.thurston.wa.us)>  
**Cc:** Paula Holroyde <[paulaholroyde@lwvthurston.org](mailto:paulaholroyde@lwvthurston.org)>; Casey Kramer <[ckramer@naturalwaters.design](mailto:ckramer@naturalwaters.design)>; Simmons, Jaclynn <[simmojac@oregonstate.edu](mailto:simmojac@oregonstate.edu)>; Nancy Winters <[wintersnl@comcast.net](mailto:wintersnl@comcast.net)>  
**Subject:** SSWAB

Greetings Larry, hope you are well...

FYI I noticed in the draft Shoreline Master Program this section that I liked:

p.39 19.300.115 Water Quality and Quantity

p.40 G. Policy SH-21.7 Stormwater outfalls into the rivers, streams, lakes and marine environment should be eliminated and diverted into settling ponds to reduce organics, harmful chemicals and waste from entering these water bodies and degrading water quality and contributing to algae growth.

On a LWV excursion into sites in the Chehalis Watershed a couple of weeks ago, Kevin Hansen and two fellows from public works met us at the Rochester site....what a great example of a stormwater site that multi-tasks! Hoping we can identify future sites that would benefit from such a project.

Regards,

Phyllis

Sent from [Outlook](#)

**From:** [kevinkathi@msn.com](mailto:kevinkathi@msn.com)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Monday, October 18, 2021 12:32:30 PM

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**Your Name (Optional):** Kevin

**Your email address:** kevinkathi@msn.com

**Comment:** It has been, and always most likely be the same with this update. Anytime the government changes an existing plan, they screw it up and add all these additional fees so the government employees in these positions can get pay raises, add staff to get promotions, and harass property owners. My vote is to LEAVE IT ALONE. The environmentalist just want to build or add to their resume and then pack their agency with more people to put more \$\$\$\$\$\$ in their pockets. I'm for the days that counties and governments actually help people with their projects---team up even with the costs. To spend our tax dollars fining, enforcing, harassing, property owners it is counterproductive, does nothing for the environment, and no wonder people have to back door issues--which, had they teamed up, the final results would be a safer environment for all. Your list of changes is all FLUFF to mislead people...no walk the talk. You all should be ashamed of yourselves and the biggest question of all: HOW CAN YOU ALL SLEEP AT NIGHT WITH YOUR LYING AGENDA?

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Time: October 18, 2021 at 7:32 pm

IP Address: 97.126.60.59

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.

**From:** [Schorno Agri-Business Glenn Schorno](#)  
**To:** [Andrew Deffobis](#)  
**Cc:** [Tim Rubert](#)  
**Subject:** RE: Incoming SMP Comment  
**Date:** Monday, October 18, 2021 5:48:09 PM  
**Attachments:** [7AB610454C94404BAB514E60F0473FA9.png](#)

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Hi Andrew,

The 1990 SMP states specific language as agriculture being a preferred use in flood planes on page 37. Could this language be used in the update?

Using geodata Parcel 22728420000 shows part of the parcel out of the SMP? Why is it included in the new SMP? The area not in the current SMP was the property that didn't flood in the 1996 flood. When I click on 1996 flood using geodata it now shows as been flooded. Please explain.

Thanks,  
 Glenn

Sent from [Mail](#) for Windows

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**From:** [Andrew Deffobis](#)  
**Sent:** Friday, October 15, 2021 4:03 PM  
**To:** [Schorno Agri-Business Glenn Schorno](#)  
**Subject:** RE: Incoming SMP Comment

Hello Glenn,

Thank you for your comments. They will be included in the public comment record and provided to the Planning Commission. As to your questions:

- I don't see that specific language regarding floodplains and ag as a preferred use. It looks like your property is proposed to be designated Rural Conservancy. As a general policy, the draft SMP states that agriculture should be allowed in this environment when consistent with provisions of the SMP. The [draft SMP](#) specifically addresses agriculture in section 19.600.110, which begins on page 91 (using page #s in the upper right hand corner). These rules do not limit or require modification of ag activities on existing agricultural lands. To my knowledge, the SMP update would not apply to changes in ag type on existing ag lands. I am running that to ground with Ecology to be sure, so stay tuned. One caveat: new ag development such as a barn would be subject to the SMP if it was to be located in SMP jurisdiction, including critical area regulations folded into the SMP.
- I would defer to our Development Services question as to how you'd proceed with a boundary line adjustment. You can leave a voicemail at (360) 754-3355 ext. 6299 or an e-mail at [planning@co.thurston.wa.us](mailto:planning@co.thurston.wa.us). Any residential development within shoreline jurisdiction would be subject to the SMP.

- If a use is discontinued for more than 2 years, it can be considered abandoned, meaning resuming that use would be considered a “new” use. In the case of agriculture, the draft SMP states that ag land purposefully allowed to lay fallow would not be considered abandoned. It doesn’t elaborate on whether ag land that is not farmed due to participation in a conservation program would be considered abandoned or not. This might be something we should take a closer look at to clarify. I have flagged this as something to look at after the hearing.

Regards,

Andrew Deffobis, Interim Senior Planner  
Thurston County Community Planning and Economic Development Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502  
Cell Phone: (360) 522-2593  
Office Phone: (360) 786-5467  
Fax: (360) 754-2939

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**From:** Schorno Agri-Business Glenn Schorno <schornoag@hotmail.com>  
**Sent:** Tuesday, October 12, 2021 9:53 AM  
**To:** Andrew Deffobis <andrew.deffobis@co.thurston.wa.us>  
**Subject:** RE: Incoming SMP Comment

Good morning Andrew,

Parcel 22728440100 is partly out of the current SMP but will be in the updated SMP.

There has been livestock on this piece off and on for many years. The trees add shelter. Now, along with a few acres adjacent to this property, we wish to continue farming it but with Christmas trees rather than cattle. Farming operations often change types of agriculture to adjust for trends. Spending several thousands of dollars in permits and having new large buffers to **continue** farming this piece but as Christmas trees seems wrong.

For future generations, I had planned on building a home on this piece. Not having this option severely detracts from the value of the property.

The current SMP states agriculture as being a preferred use on flood plane property. Does the new SMP include such language?

Is it possible to move the parcel boundaries east so a homesite could be used on our neighboring property?

On another note the CRP and CREP programs are federal programs that ag land can be put into and out of over many years. How would the SMP rules affect land coming out of this program to farm

again?

I plan to read the proposed SMP this week. I will have some more comments soon.

Best Regards,  
Glenn

Sent from [Mail](#) for Windows

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**From:** [Andrew Deffobis](#)  
**Sent:** Thursday, October 7, 2021 12:54 PM  
**To:** [schornoag@hotmail.com](mailto:schornoag@hotmail.com)  
**Subject:** RE: Incoming SMP Comment

Hello Glenn,

Thank you for your comments. They will be added to the public comment record and provided to the Planning Commission.

If you have a specific property or land use project in mind, I can try to provide more information about how the SMP update may affect you.

Regards,

Andrew Deffobis, Interim Senior Planner  
Thurston County Community Planning and Economic Development Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502  
Cell Phone: (360) 522-2593  
Office Phone: (360) 786-5467  
Fax: (360) 754-2939

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**From:** [schornoag@hotmail.com](mailto:schornoag@hotmail.com) <[donotreply@wordpress.com](mailto:donotreply@wordpress.com)>  
**Sent:** Thursday, October 7, 2021 8:56 AM  
**To:** SMP <[SMP@co.thurston.wa.us](mailto:SMP@co.thurston.wa.us)>  
**Subject:** Incoming SMP Comment

**Your Name (Optional):** Glenn Schorno

**Your email address:** [schornoag@hotmail.com](mailto:schornoag@hotmail.com)

**Comment:** Who benefits from the update? Who's property loses value from the update? Is there a mechanism to fully compensate the landowners that lose value?

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Time: October 7, 2021 at 3:55 pm

IP Address: 74.209.54.88

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.



**From:** [mauidia@aol.com](mailto:mauidia@aol.com)  
**To:** [Andrew Deffobis](#)  
**Subject:** Shoreline Master Plan  
**Date:** Monday, October 18, 2021 7:04:40 PM

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Andrew: I would appreciate it if you would relay this e-mail to the members of the Planning Commission as I am out of State and will not be back until after the 22nd of October. Diane Oberquell

To: MEMBERS OF THE PLANNING COMMISSION

I have been reading the material provided and trying to understand why there is a proposal for an area of Nisqually Reach being re-designated from "rural to "rural conservancy". It appears from the criteria that I have seen that the area is more represented by "shoreline residential" as it is more developed. I can see no justification for changing the buffers or set-backs. As I stated the shoreline is developed and there are a number of other programs that have placed rules and regulations regarding set-backs, re-building requirements and a number of other regulations. The area we are talking about abuts the aquaculture area where there is commercial oyster and geoduck harvesting, which is also very much regulated by the County and the State Dept of Ecology. It appears that this area is well protected already...Thank you for your consideration. Diane Oberquell, 4845 Stark Ln. N.E., Olympia, WA 98516 ( 360-491-0340 )

**From:** [FRANK AND HEIDI Hudik](#)  
**To:** [Andrew Deffobis](#)  
**Cc:** [Barry Halverson](#); [Kim Nelson](#); [Curtis Cleaveland](#); [Jim Biehl](#); [Mike Fischer](#); [John Woodford](#)  
**Subject:** Comments to Shoreline Master Program (SMP)  
**Date:** Monday, October 18, 2021 9:10:36 PM  
**Attachments:** [Comments to SMP dated 20 October 2021.pdf](#)

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Andrew, please acknowledge receipt of the attached comments to the DRAFT SMP.

Thank you.

Frank and Heidi Hudik

16246 Pleasant Beach Drive SE

Lawrence Lake

Yelm, WA 98597

20 October 2021

Below comments are numbered to facilitate communication by reference.

1. Appendix A is not included in the document. Therefore, for the purpose of commenting below it is assumed 16246 Pleasant Beach Drive SE Lawrence Lake, Yelm, WA "is designated in the SEP and Appendix A maps as "*Residential Shoreline*". There are no comments about this designation, merely confirming.
2. We support and hereby endorse comments to the DRAFT SMP document from the Thurston County Shoreline Stakeholders Coalition (Ltr from John H Woodford, Chairman dated 23 September 2021), and comments regarding "Conforming vs. Non-Conforming" dated 31 August 2020. (RCW 90.58.620)  
Accordingly, please include our name as signatories to these referenced comments.
3. 19.100.110 Purpose and Intent /// and /// 19.100.120 Applicability  
All comments included below assume the following stated intent of the DRAFT SMP including its imbedded references such as those listed in 19.400.125:  
*"...the purpose of the Master Program is to guide the future development of the shorelines in Thurston County in a manner consistent with the Shoreline Management Act of 1971, hereinafter the "Act."*  
AND  
*"Proposes any new use..."*  
Citizen input: An important perception of these statements is "future development" and "new use" as opposed to previous development and current state. All comments provided herein assume this intent and relevant enforcement policy, as opposed to retroactively adding new restrictions (resulting in "non-conformance"). When a site-plan, construction permits, inspections, variances etc. were already approved by Thurston County, (SEPA/JARPA/HPA/Variance), often at great expense by the homeowner, why are they now "non-conforming"? This designation conveys the stigma of illegality or potential future actions invoked by the next document version/amendment? This is particularly worrisome for home Sellers.
4. 19.150.600 Normal Repair  
The provisions of this paragraph should apply to the repair of dock/surfaces that have deteriorated with time, often to the point of an unsafe condition including splintering wood surfaces. Dock repairs should be encouraged for safety and aesthetic reasons, not discouraged.
5. 19.300.105 and .110 Ecological Provisions, Conservation

Consistent with the intent and stated mandates of this section (SH-3e, SH-16., etc), Lake Management Districts (LMD) should be explicitly acknowledged in this Plan, strongly encouraged, and fiscally supported by WA State and Thurston County via general fund (**tax-funded**) accounts. Our lakes are County resources! Our lakes are State resources! Our lakes are deteriorating! Fees collected by LMD constituents should be used strictly to fund direct boots-on-the-ground efforts such as invasive weed removal. Other uses of LMD funds (e.g., County Administrative costs) should be explicitly forbidden by this SMP, as it has the weight of law. Bottom line: administrative costs to operate the LMDs should be totally borne by Thurston County (General Fund) as the same LMD fee payers who directly support lake stewardship are also **taxpayers**. This Plan specifies treatment of government entities as equal participants in its impact so let's levy quid-pro-quo fiscal responsibility for administering LMDs on the government (**taxpayer**), not the LMD **fee** payers.

6. 19.400.120B Buffer Widths

We vehemently disagree with Residential Buffer changes proposed, struck-through, and re-proposed as an option to the existing 50ft. There appears to be no science presented to change the 50ft buffer rule. Such expansion is particularly restrictive to small lakefront lots that pay a premium in taxes owing to "lakefront" tax-assessment designation. Per the SMP, the buffer expansion implies relegation to "non-conforming" status. The existing 50ft buffer caused us considerable home redesign and construction delay (\$\$) to ensure compliance!!! Now it's going to be 75? Why not an even 100, 200... What is the science?

7. 19.500.100B. 2 Permits

We agree with the statement that SDPs should not require public hearing.

8. 19.600.160B Moorings and C Standards

Again, we agree that Public Hearing should not be required per the note. Also, buoys obstruct water-skiing navigation, effectively making the lake smaller for turning high speed boats. Buoys for mooring should not be encouraged for lakes. The moored boat is an issue, as is the buoy itself. If located in 16ft of water (minimum), the buoy and moored boat will be significantly located in the high-speed-turn path of ski boats.

9. 19.600.160B.I

Full (100%) dock surface replacement should not require a permit. The 50% rule seems arbitrary and basically results in 2 very different dock surfaces (unsightly) and potentially a temporary safety issue for no apparent gain (except to obtain permit fees). Note: this very issue was recorded in letters from the Lawrence Lake LMD Citizens' Advisory Committee as feedback to the DRAFT SMP, dating back to **8 May 20 11**. Letters are available - upon request from the Commissioners. A response was never received.

10. Agree grating should not be required on lakes with no salmon (Lake Lawrence).
11. Dock pile spacing of 20ft is unreasonable and seemingly not supported by any science. It becomes expensive to span 20ft vs 8ft. Also, a citizen should be able to construct a span of 8ft but 20ft spacing would require expensive contractor work and non-standard material lengths. Also see next comment.
12. It is unclear why the existing 8ft wide dock requirement needs to be lessened to 6ft. Standard dock surface material is typically sold in 16ft lengths so a single piece would cover two x 8ft widths. This restriction did not apply in 2006, what is the new science?
13. 19.600.170B.10 Residential Development  
Change "prevention" to "reasonable reduction": *'Single-family residential uses are a priority use only when developed in a manner consistent with control of pollution and reasonable reduction ~~prevention~~ of damage to the natural environment.*  
Rationale: everything damages the environment during construction.
14. Appendix C.5  
The existence of Lake Management Districts (LMD) does not seem to appear anywhere in the list of resources or funded efforts that are in place, pro-active, and reflective of concerned citizen involvement. These entities, as well as Special Use Districts (SUD) should be acknowledged in the SMP, and fiscally supported by State and County government. See related comment 4.

**From:** [johnd\\_morgan@hotmail.com](mailto:johnd_morgan@hotmail.com)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Monday, October 18, 2021 7:39:56 PM

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**Your Name (Optional):** JOHN D MORGAN

**Your email address:** johnd\_morgan@hotmail.com

**Comment:** school land rd. separates my home and most of my land from the black river. So why cant the buffer end there, after all there is no run off from my my main land to river.

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Time: October 19, 2021 at 2:39 am

IP Address: 174.21.99.48

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.

**From:** [hudik5@comcast.net](mailto:hudik5@comcast.net)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Monday, October 18, 2021 9:58:54 PM

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**Your Name (Optional):** Frank Edward Hudik

**Your email address:** [hudik5@comcast.net](mailto:hudik5@comcast.net)

**Comment:** For the record, an e-mail was sent to Mr Andrew Deffobis on 18 October 2021, with our comments included as an attachment to the e-mail.

We wish to thank the persistent efforts of John Woodford, Barry Halverson and Doug Karman. We hereby endorse comments to the SMP by the Thurston County Shoreline Coalition, as formally submitted in a letter from John Woodford dated 23 September 2021.

Comments from the Lawrence Lake Citizen Advisory Committee to previous DRAFTs of this SMP were submitted to Ms Cindy Wilson and then-Commissioner Sandra Romero dating back to 8 May 2011. These comments were never acknowledged, and some of the same issues remain in this DRAFT. We request a decision/response to each of the comments provided to Mr Deffobis in our 18 October 2021 e-mail.

Lake Management Districts (LMD) remain a viable resource to address lake stewardship and water quality issues. The cooperative efforts of citizen and government in LMD formation and maintenance should be addressed in this document, with due encouragement to support the LMDs. In addition, the SMP should codify the allowable legal use of LMD fees for direct lake stewardship activities only. Fees should not be used for administering the LMDs. It is our hope the SMP will provide legal clout to this precept and stop the persistent raiding of scarce LMD funds (fees) for County administration purposes.

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Time: October 19, 2021 at 4:58 am

IP Address: 73.193.90.134

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.

**From:** [schornoag@hotmail.com](mailto:schornoag@hotmail.com)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Tuesday, October 19, 2021 8:28:35 AM

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**Your Name (Optional):** Glenn Schorno

**Your email address:** schornoag@hotmail.com

**Comment:** In order to preserve value of parcels negatively impacted by the proposed SMP, I recommend allowing owners with neighboring parcels under the same ownership, the ability to move their affected parcels out of the SMP to unaffected areas while retaining their current underlying zoning. The parcels could be moved through a special type of boundary line adjustment or other by other means. The total number of parcels would be unchanged. This will help preserve our family farm for the future financially and ecologically. Farmers have been negatively impacted for decades through rezones without being fully compensated. Please help us.

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Time: October 19, 2021 at 3:28 pm

IP Address: 74.209.54.88

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.



**From:** [Andrew Deffobis](#)  
**To:** [Brian K Muirhead](#)  
**Cc:** [Dr. Nancy Muirhead](#)  
**Subject:** RE: Updated Inputs to SMP and SED  
**Date:** Tuesday, October 19, 2021 3:34:00 PM

---

Hello Brian and Nancy,

Thank you for your comments. They will be included in the public comment record and provided to the Planning Commission.

Regards,

Andrew Deffobis, Interim Senior Planner  
Thurston County Community Planning and Economic Development Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502  
Cell Phone: (360) 522-2593  
Office Phone: (360) 786-5467  
Fax: (360) 754-2939

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**From:** Brian K Muirhead <brian91011@earthlink.net>  
**Sent:** Tuesday, October 19, 2021 10:30 AM  
**To:** Andrew Deffobis <andrew.deffobis@co.thurston.wa.us>  
**Cc:** Dr. Nancy Muirhead <nancymuirhead@verizon.net>; Emily Pitman <emily.pitman@co.thurston.wa.us>; Brian Muirhead <brian91011@earthlink.net>  
**Subject:** Updated Inputs to SMP and SED

Andrew,

Attached is a complete set of inputs to the SMP from my wife Nancy and I as residents on Pattison Lake as of Oct. 2020. The first section contains inputs to the SMP that include our previous inputs on the buffer dimensions. The second section is a more detailed treatment of the issue we have with the proposed SED. There is also an additional input on the SED associated with the railroad property passing between the north and south parts of the lake.

Thank you for your hard work on this important document and working with the community to get it right.

Brian and Nancy Muirhead  
[brian91011@earthlink.net](mailto:brian91011@earthlink.net)  
818 687 7003

Andrew,

Below are my additional comments and inputs to the SMP. Also attached are my edits to the existing GeoData maps and supporting survey of our residential parcel plus a site map which includes a part of the

On Oct 7, 2021, at 11:24 AM, Andrew Deffobis <[andrew.deffobis@co.thurston.wa.us](mailto:andrew.deffobis@co.thurston.wa.us)> wrote:

Hi Brian,

I have copied our GIS analyst here so she can tell you more about the aerial imagery in the SED tool.

As part of the SMP update process, we are looking into the proposed SEDs as citizens make us aware of new information.

You may submit further comments to me directly, or using the comment form on the SMP open house. Whichever you prefer, they all end up with me. The written public comment period for the Planning Commission's hearing will be open until 11:59 PM on Friday, October 22, 2021.

Regards,

Andrew Deffobis, Interim Senior Planner  
Thurston County Community Planning and Economic Development Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502  
Cell Phone: (360) 522-2593  
Office Phone: (360) 786-5467  
Fax: (360) 754-2939

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**From:** Brian K Muirhead <[brian91011@earthlink.net](mailto:brian91011@earthlink.net)>  
**Sent:** Wednesday, October 6, 2021 6:55 AM  
**To:** Andrew Deffobis <[andrew.deffobis@co.thurston.wa.us](mailto:andrew.deffobis@co.thurston.wa.us)>  
**Cc:** Dr. Nancy Muirhead <[nancymuirhead@verizon.net](mailto:nancymuirhead@verizon.net)>  
**Subject:** Re: Resend: Input to SMP

Andrew,

Thanks for your emails and thanks for the SED report. I was surprised that this is a final Draft but dated 6/30/13, interesting that there's been no updates since then, implying that any issues haven't been identified or worked since then. I'm familiar with the SED map tool but I don't know when the arial image was last updated. I'll look at my survey information and take some pictures to try and show where and why I think the designation is incorrect.

I'll be sending in additional comments on the SMP through the virtual site (unless you'd rather I send them directly to you), and will be at the 10/20 meeting.

Best regards,

Brian

On Oct 5, 2021, at 5:42 PM, Andrew Deffobis  
<[andrew.deffobis@co.thurston.wa.us](mailto:andrew.deffobis@co.thurston.wa.us)> wrote:

Hi Brian,

Just to close the loop, I've added your comment to our public comment record, and am keeping tabs on the shoreline designations people have asked the county to revisit. Any changes to the proposed designations will need to be rooted in the designation criteria in [our draft Shoreline Environment Designations report](#). The criteria for designating shorelines for Thurston County's update begins on page 4. If you have information that suggests the proposed designation of Natural is not the most appropriate, and that another designation may be more appropriate based on the criteria, please feel free to send it my way.

Please note that your property is part of a larger shoreline reach that includes at least three parcels to the north, and associated wetlands on the parcel to the southeast of this parcel. We would be evaluating this reach as a whole, though the boundaries of reaches can be modified if the designation criteria would support that (i.e. the land use changes significantly across a large area).

In addition to written testimony, please note the Planning Commission will hold a public hearing on the SMP update on October 20, 2021 at 7 PM. There will be an in-person component at the Courthouse (Room 280, Building 1, 2000 Lakeridge Drive SW in Olympia) and a virtual component on Zoom. We will post log-in information next week. The public is encouraged to attend and testify at the public hearing.

Regards,

Andrew Deffobis, Interim Senior Planner  
Thurston County Community Planning and Economic Development  
Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502  
Cell Phone: (360) 522-2593  
Office Phone: (360) 786-5467

Fax: (360) 754-2939

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**From:** Brian K Muirhead <[brian91011@earthlink.net](mailto:brian91011@earthlink.net)>  
**Sent:** Monday, October 4, 2021 11:11 AM  
**To:** Andrew Deffobis <[andrew.deffobis@co.thurston.wa.us](mailto:andrew.deffobis@co.thurston.wa.us)>  
**Cc:** Dr. Nancy Muirhead <[nancymuirhead@verizon.net](mailto:nancymuirhead@verizon.net)>; Brian Muirhead <[brian91011@earthlink.net](mailto:brian91011@earthlink.net)>  
**Subject:** Resend: Input to SMP

Andrew, I'm sure you're swamped with the 10/20 hearing coming up but I need to be sure you got my message below and get some guidance on how to deal with the SED issue. Thanks, Brian

Andrew,  
Thank you for your briefing to the Thurston County lake residents on 9/23/21.  
My name is Brian Muirhead and my wife Nancy and I are new residents on Pattison Lake as of Oct. 2020. We have two major issues we are bringing to your attention now and will provide additional inputs on a number of other items through the virtual Open House process.  
We agree strongly with one of the questioners at your talk that any buffer zone dimension should be based on specific criteria that the Dept. of Ecology (DoE) might have for changing any of the buffer dimensions away from the current ones, e.g. Shoreline Residential: 50 ft. We both work in scientific fields and we recognize that basing decisions on "science" must always be able to be validated, typically by independent sources of data, analysis and where possible, testing. I've tried looking for appropriate information on the DoE website but the varied nature and volume of documentation left me unable to find what I was looking for. Any pointers would be helpful.  
Therefore, our position on 19.400.120.B.1. is based on what we know at this time and we support the smallest number buffer zones for each designation: Shoreline Residential: 50 ft; Urban Conservancy: 100 ft; Rural Conservancy: 125 ft and Natural: 200 ft. With respect to the proposed SED changes - we need to challenge what looks like a redrawing of the boundary lines along parcel boundaries and redesignation of our parcel 11702140600 as "natural." Our residence is on the adjacent parcel 11702420100.  
We understand and happily accept that part of our parcel, 11702140600, is under a Department of Fish and Wildlife bald eagle management plan (due to a nest that was active in 1998), agreed to by the original owner of this property in 1998. However, the previous owners and now ourselves are using parts of parcel 11702140600 as active living space along with parcel 11702420100. We need to know how to properly update the SED map to show shoreline residential and rural conservancy designations as it is and has been being used and maintained, and

finding agreement on a natural designation where appropriate.  
Thank you for hard work on this important document and working  
with the community to get it right.

Brian and Nancy Muirhead

[brian91011@earthlink.net](mailto:brian91011@earthlink.net)

818 687 7003

To: Andrew Deffobis. ([Andrew.deffobis@co.thurston.wa.us](mailto:Andrew.deffobis@co.thurston.wa.us))

Andrew,

Below is a complete set of inputs to the SMP from my wife Nancy and I as residents on Pattison Lake as of Oct. 2020. The first section contains inputs to the SMP that include our previous inputs on the buffer dimensions. The second section is a more detailed treatment of the issue we have with the proposed SED. There is also an additional input on the SED associated with the railroad property passing between the north and south parts of the lake.

Thank you for your hard work on this important document and working with the community to get it right.

Brian and Nancy Muirhead  
[brian91011@earthlink.net](mailto:brian91011@earthlink.net)  
818 687 7003

**Inputs to the SMP:**

General comment: There are a significant number of references to the powers and authorities of the Department of Ecology (DoE) in the SMP but we don't find any reference(s) to where to find the applicable information on the criteria DoE uses for their decisions and how they're defined and managed. For example, per 19.500.100.D.4 DoE must approve all shoreline CUPs. While there is a reference to a WAC requiring the review, there is no reference to any document that provides the basis for approval/disapproval. We think that some statement(s) should be added to the beginning of SMP that highlights the roles of DoE with respect to the quality of the water in the lakes and elsewhere and provide some appropriate references to DoE documents and policies that give some insight to evaluation criteria use by DoE.

Specific paragraph inputs:

19.400.100. The labeling of all existing legally built homes and/or accessory structures already located within the buffer should be labeled "conforming" not "legal non-conforming" as currently recognized by state law.

19.400.120.B.1. Based on what we know at this time about the ecological benefits of the buffer size for fresh water lakes we support the smallest sized buffer zones for each designation: Shoreline Residential: 50 ft; Urban Conservancy: 100 ft; Rural Conservancy: 125 ft and Natural: 200 ft.

19.400.120.D.1.e. We agree that water oriented storage structures should be for residential use only.

19.400.120.D.2 We agree with the addition "herbicide"

19.500.075 and 19.500.100.B.2. We agree that SDP, CUP and Variances should be processed administratively to avoid the additional time and complexity of public hearings.

19.500.100.B.5 states all SDP's are to be submitted to DoE "upon a final decision by local government." What does this mean in practice? Does DoE have the power to approve/reject an approved SDP? If not, it should be made clear why the SDP is provided to DoE.

19.600.160.C.1.r. We agree on striking a requirement for grating percent for docks on lakes without salmon.

19.600.160.C.3.b. and C.4.a. We agree with conducting a public hearing on shorter distances for spacing of residential dock pilings in lakes. Given the interest in keeping docks to demonstrated need size the piling locations and spacing should be based on the structural design and safety not seemingly arbitrary dimensions.

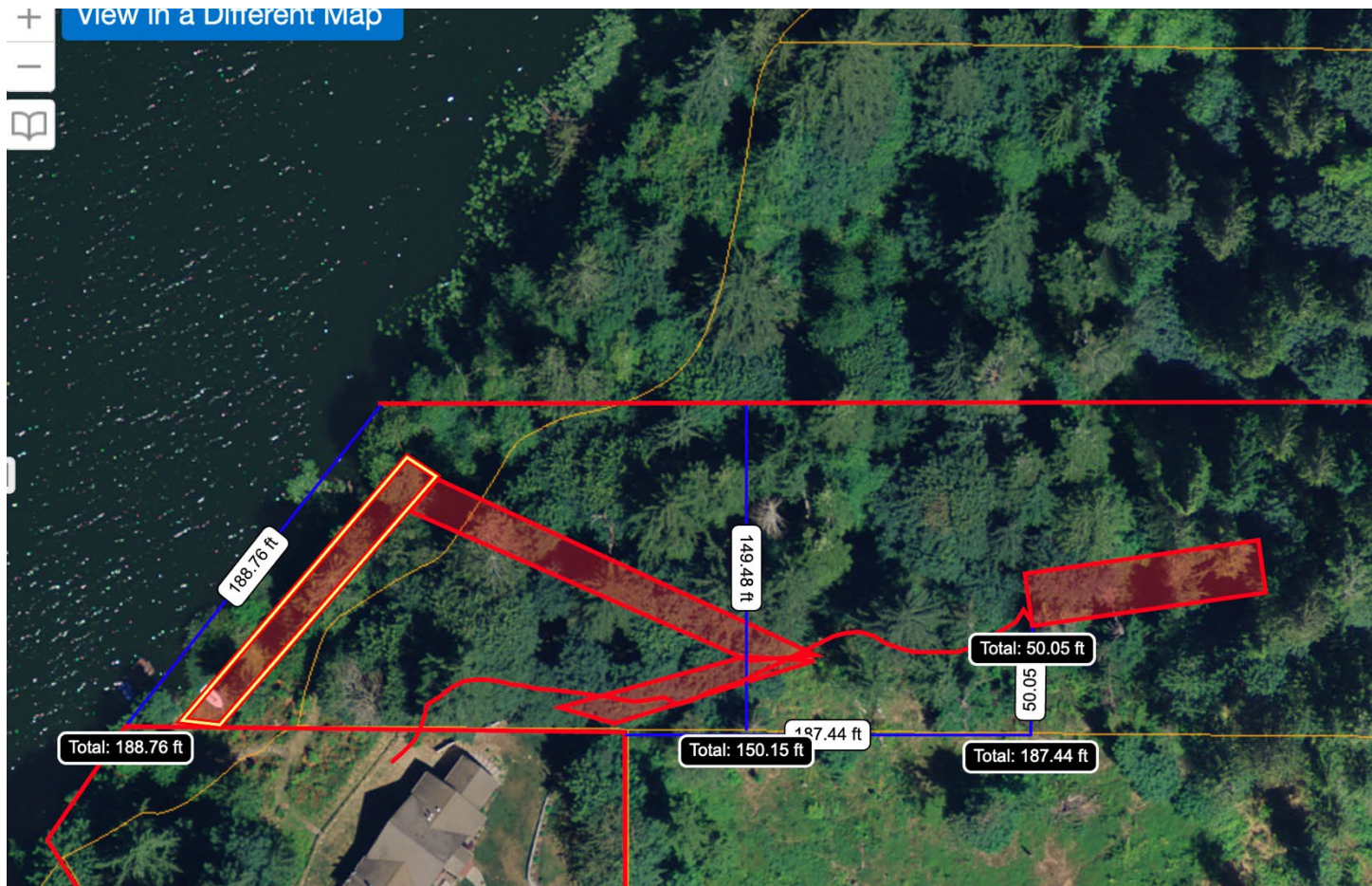
### **Inputs on the proposed SED for our properties:**

The following is from previous email to you sent 9/30, which you responded to on 10/5/21: With respect to the proposed SED changes - we need to challenge what looks like a redrawing of the boundary lines along parcel boundaries and redesignation of our parcel 11702140600 (-600) as "natural." Our residence is on the adjacent parcel 11702420100 (-100). We understand and accept that part of our parcel, -600, is under

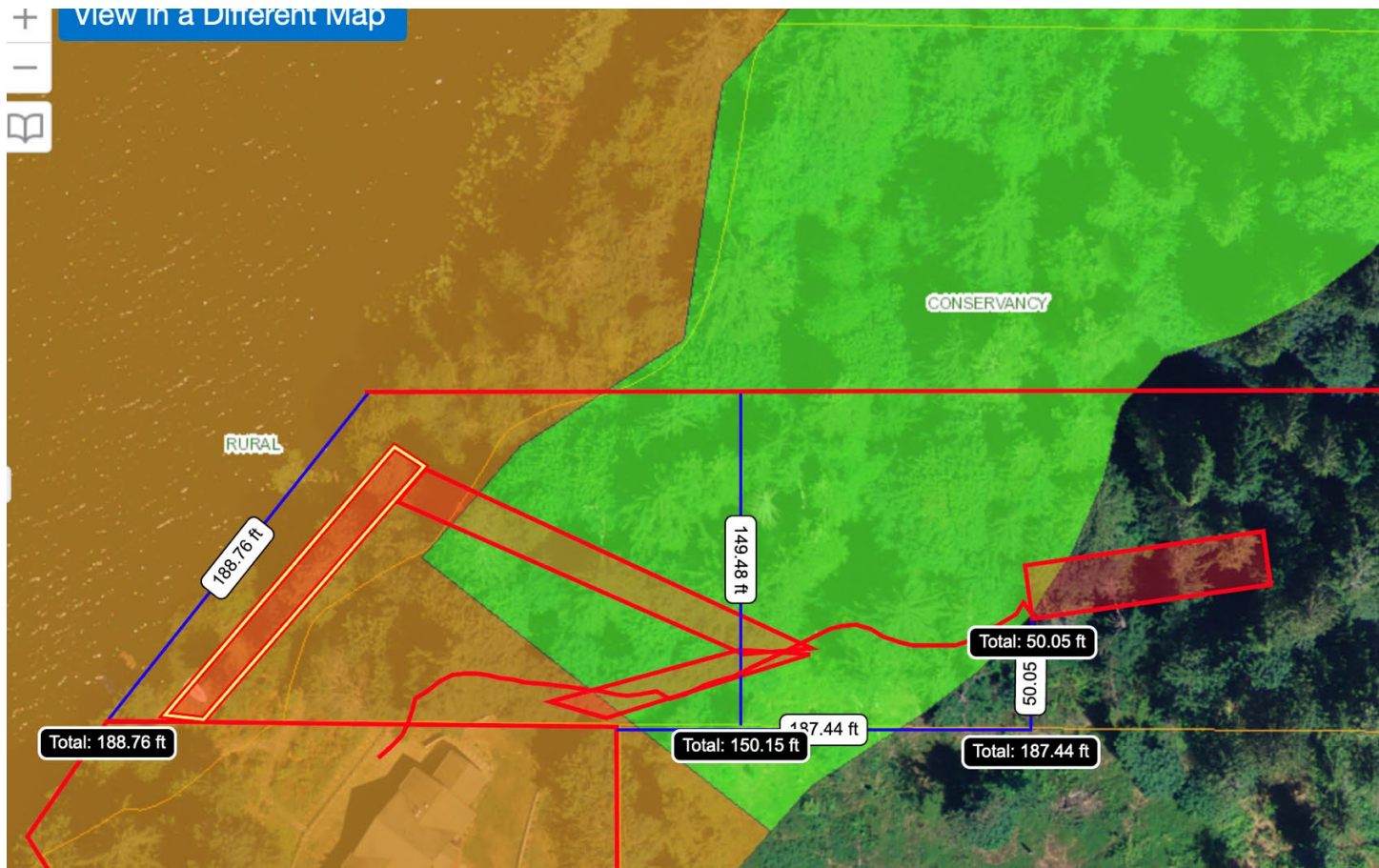
a Department of Fish and Wildlife bald eagle management plan (due to a nest that was active in 1998) agreed to by the original owner of this property in 1998. However, the previous owners and now ourselves are using parts of parcel -600 as active living area, for access to the lake and for the septic drainage system. We need to know how to properly update the SED map to show shoreline residential and rural conservancy designations as it is and has been being used and maintained, and finding agreement on a natural designation where appropriate.

The following are new inputs in response to your questions. Below is a figure that is a very rough edit of the GeoData map of the -600 parcel and part of the -100 parcel. The red polygons are pathways from -100 to the shoreline through -600, and the most eastward (to the right) is the septic drainfield (with a curvy line from the tanks at the back of the house). The next drawing shows where the current shoreline designations are. It seems to me that the geodata map is not accurate with respect to the actual shoreline and the 2018 and 2019 aerial views are not clear with respect to the existing backyard down to the shoreline. I'm preparing a more accurate sketch (based on the 3<sup>rd</sup> figure below), which I hope to have in the next few days. I've also contacted a surveyor to do a boundary survey of the -600 parcel (we have a detailed survey and topo of the -100 parcel) but don't know when that might be available. With the new survey we'd have an accurate basis for where the SED lines should be drawn. If it makes sense, we could also do a boundary line adjustment to get a cleaner interface between the parcels.



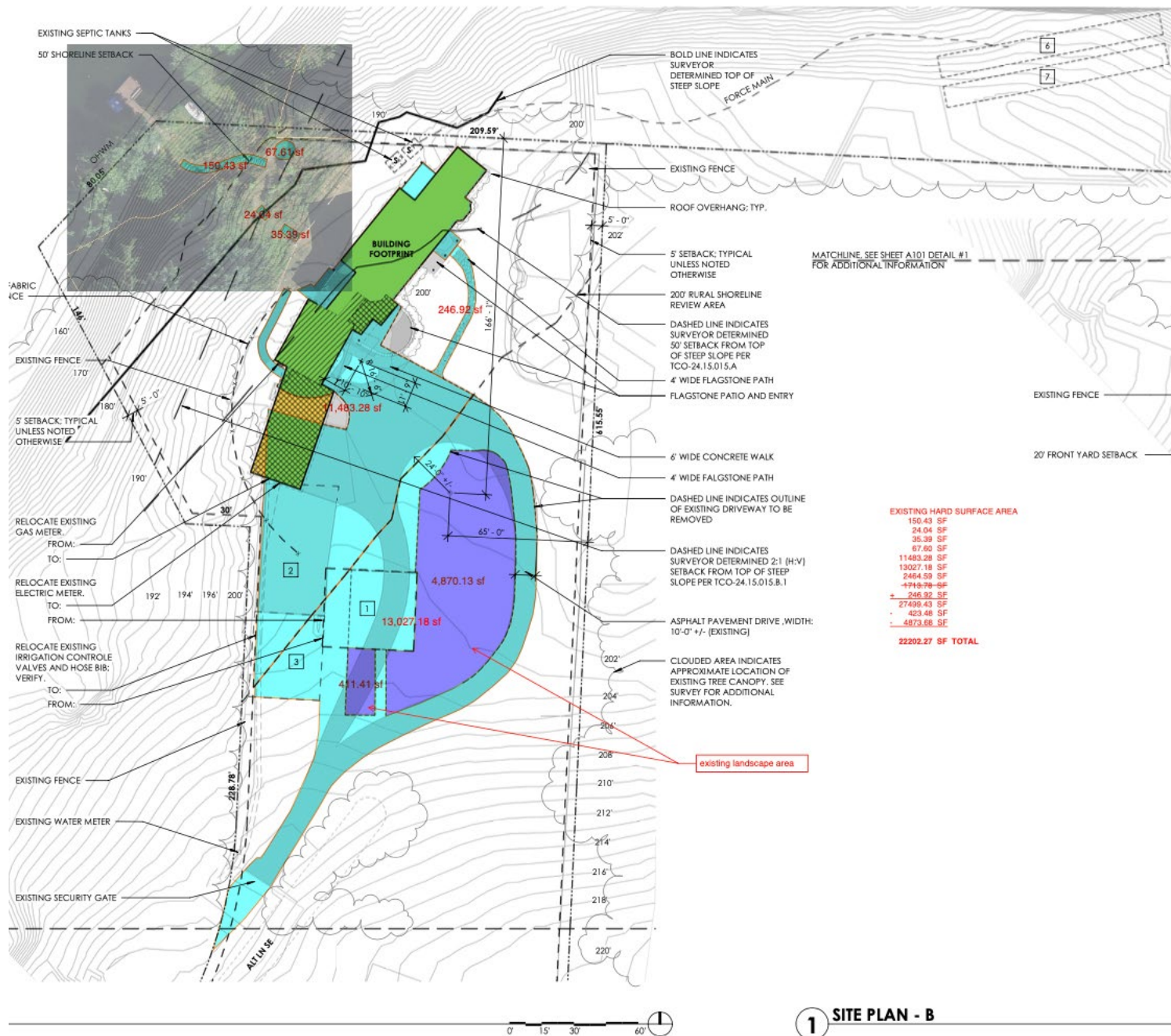


Geodata image with very rough existing features not seen from aerial image.



Geodata image with current SED contours.



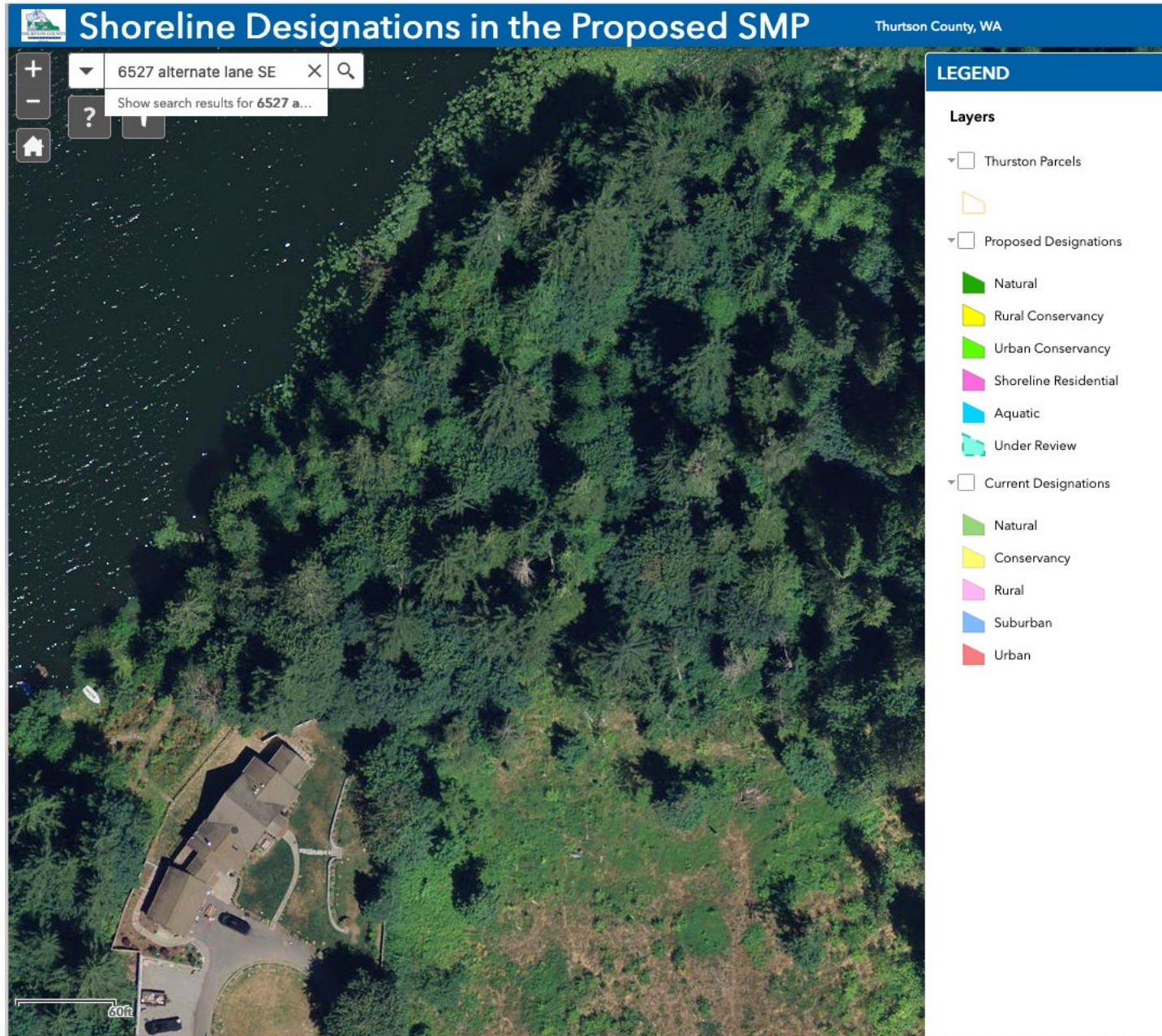


Existing site plan for parcel -100 that has some part of -600, including septic drainage field. This drawing will be updated to better show existing feature in -600 parcel that have and are being used by owners.

**Additional SED issue:** We are entering this input on the behalf of various members of the Pattison Lake Association. The region of Pattison Lake that accommodates a railroad trestle and tracks is currently labeled as shoreline residential. This is inappropriate given the purpose and designation criteria as defined in the SED report of June 30, 2013. A designation of urban or rural conservancy are more accurate and appropriate.

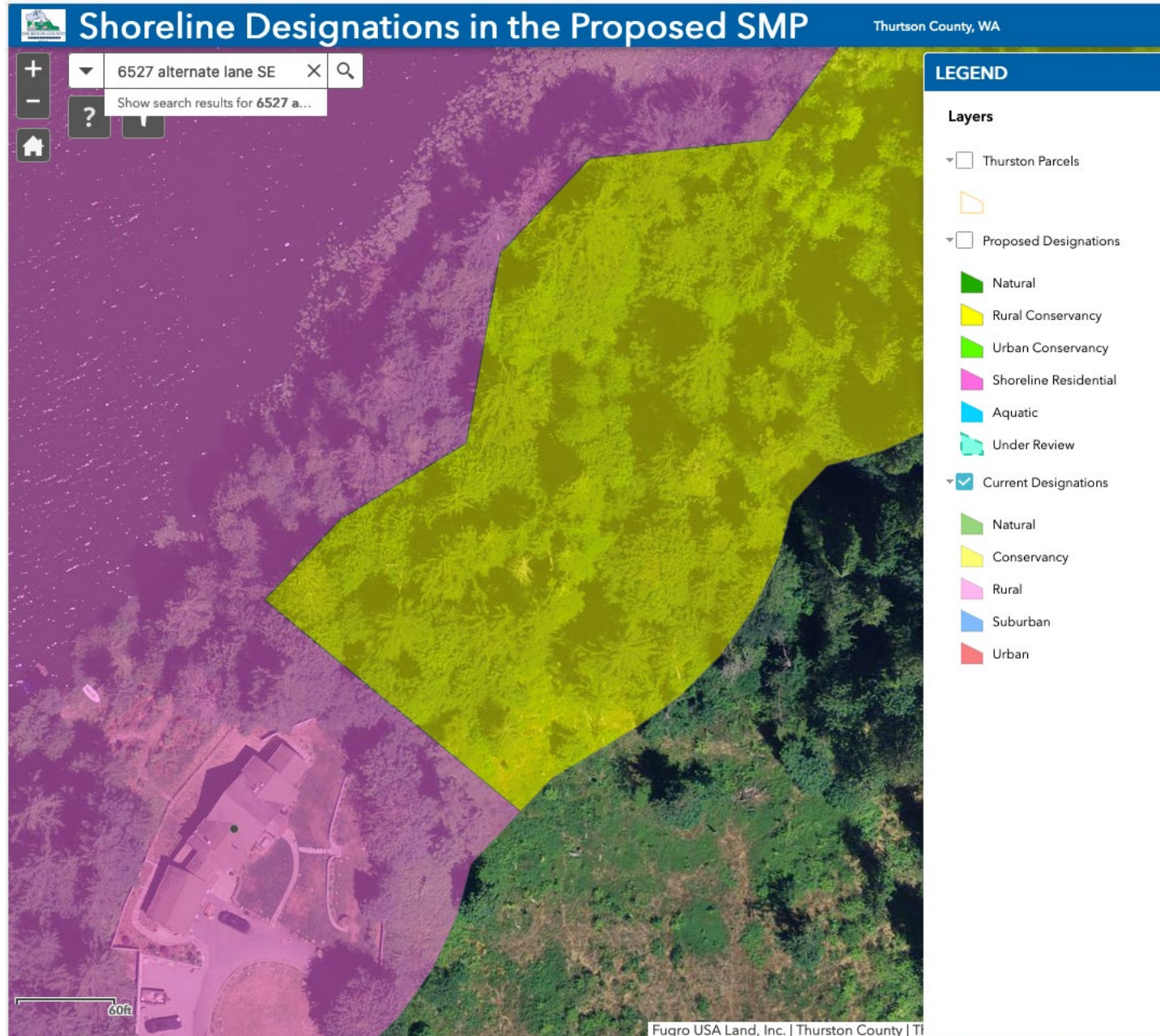
**For reference, the following are screen shots of the SED maps part of the SMP.**



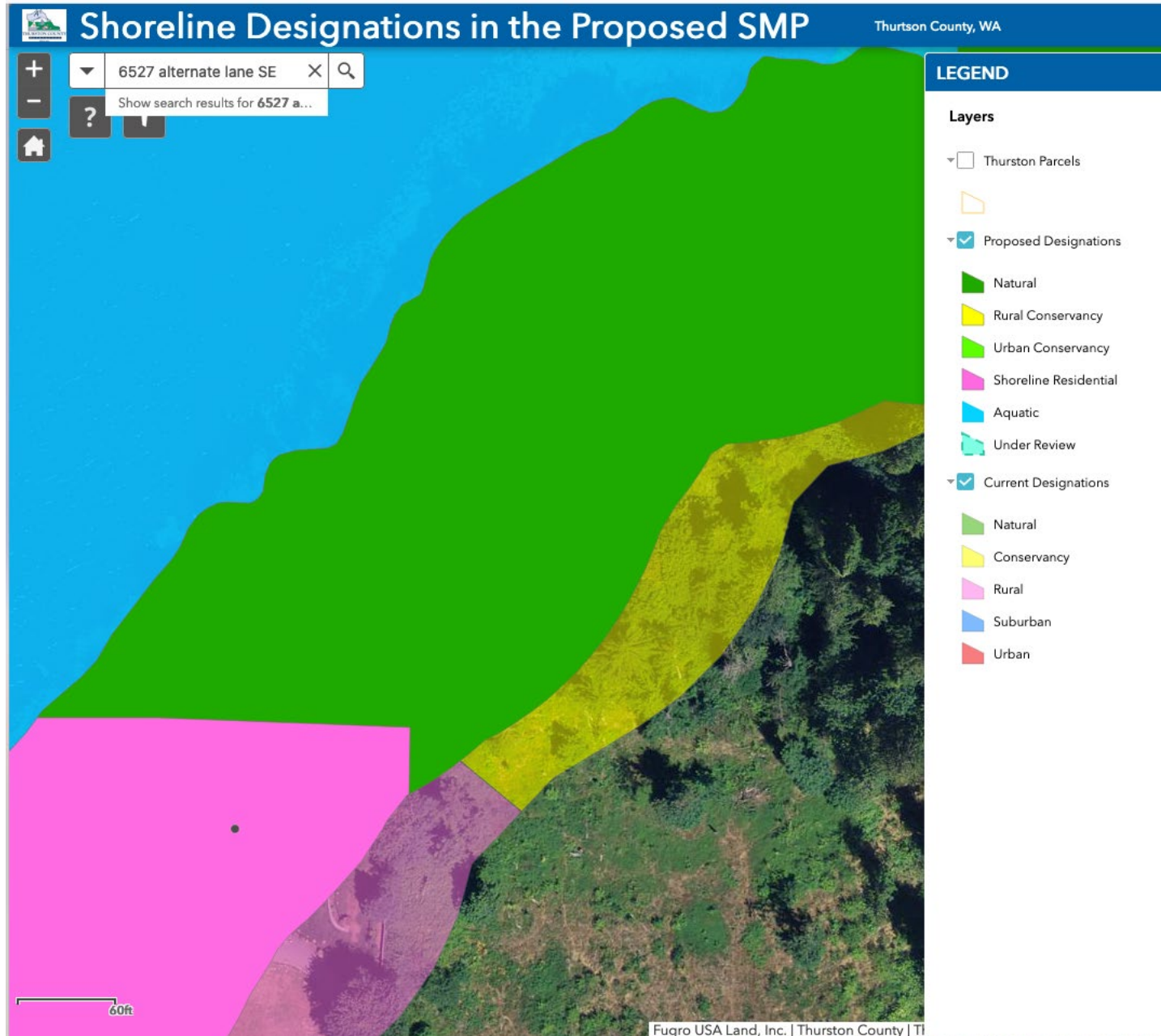


Aerial view (2018) of partial -100 and -600 parcels





Aerial view (2018) of partial -100 and -600 parcels with current SED designations



Aerial view (2018) of partial -100 and -600 parcels with proposed SED designations that we have issue with.

**From:** [jeffkrgr@gmail.com](mailto:jeffkrgr@gmail.com)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Tuesday, October 19, 2021 10:45:02 AM

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**Your Name (Optional):** Jeff Krueger

**Your email address:** [jeffkrgr@gmail.com](mailto:jeffkrgr@gmail.com)

**Comment:** Hello, Thank you for asking for input. I grew up on Puget sound & have lived on Lk St Clair for over 40 years.

These proposals are sometimes written in a way that require clarity, for example Buffers. A buffer gets described as 50' in width. I'm guessing it is written incorrectly and is intended to read 50' from the high water mark and then 50' onto the property. My lot for example is apx 160' wide at the lake, so the way it's been written I have 110' that would not be addressed. The do's & don'ts of the buffer section need to be way better defined. Limb thinning for example is way too intrusive. In the county's effort to adopt regs that make sense, it is important to remember not to overreach.

Docks and Piers: Shallower lakes like Long Lake probably use more piers (docks on pilings) and have their own requirements, but deep lakes like Lk St Clair use floating docks. With the exception of shoreline trees, properly constructed docks are probably the best contributor of shade and help with cooler habitat. Docks should be allowed in the SED and should be an inexpensive and unpainful permit. Up until now, a dock permit has been so expensive and time consuming that many have been built without permits. The ability to educate homeowners to the proper products for floatation, correct types of treated for joisting and decking and environmentally friendly sealers. It would be nice to see the County educate lake owners and have a program to update old docks with styrofoam float logs or old oil drums. Proposed SMP, Expanding a Structure: Is it the County's intent that a structure may be expanded up to 500 Sq Ft? It has been for years that providing your plans meet the pervious vs impervious ratio an addition of any size is allowable. I can't imagine the intent is to limit any addition to a 500 Sq Ft maximum. If this is the case, it is way too overreaching.

Lake St Clair has an inflow but no outflow. With that in mind, insuring good water quality and addressing those items that create pollution are important. There is a county road culvert on Glory Dr that might need to be looked at. Lake residents have always been concerned about how many septic systems are a problem especially when the water gets high. A program for assistance might be considered. Another nasty pollution contributor is old bulkheads made of railroad ties. Railroad ties have no place around water and continue to leach during hot days for years. These should be identified, homeowners should be notified, and leniency should be offered for replacement. Again, thank you for asking for public input. I am currently out of town but would be happy to be involved going forward.

Jeff Krueger

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Time: October 19, 2021 at 5:44 pm

IP Address: 184.101.127.102

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.



**From:** [schornoag@hotmail.com](mailto:schornoag@hotmail.com)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Tuesday, October 19, 2021 10:48:55 AM

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**Your Name (Optional):** Glenn Schorno

**Your email address:** schornoag@hotmail.com

**Comment:** The 1990 SMP states agriculture as a preferred use on flood planes. (page 37) On farmers' behalf, please keep this language in the updated SMP.

Also, if a shoreline shrinks or a restored, well established, mediated buffer dies due to a natural event or a "fix" of a man made problem being addressed and remedied, will the SMP boundaries be adjusted? Will wetlands be reclassified? e.g. The Centralia power canal has leaked for decades causing wetland along large portions of the neighboring properties. The city has started to line the bottom of the canal to address the problem.

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Time: October 19, 2021 at 5:48 pm

IP Address: 74.209.54.88

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.

**From:** [Donovan & Meredith Rafferty](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** SMP Hearing Comment: Standardize SED Criteria  
**Date:** Tuesday, October 19, 2021 11:41:49 AM  
**Attachments:** [Rafferty Standardize SED Criteria PDF.pdf](#)

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We are submitting the attached comment to the SMP Public Hearing.

Thank you,  
Meredith & Donovan Rafferty  
618 77th Ave NE  
Olympia, WA 98506

October 19, 2021

TO: Thurston County Planning Commission

Andrew Deffobis  
Interim Senior Planner, Thurston County

FROM: Meredith & Donovan Rafferty  
618 77<sup>th</sup> Ave NE  
Olympia, WA 98506

RE: Standardize evaluation of “environmental limitations”, a broad criteria for Rural Conservancy

Our property’s saltwater shoreline lies in a dense development that is now identified as a half-mile-long “reach”, MBU-16. The draft SMP embraces totally new criteria for designating shoreline categories that are not directly based on the ecological intactness of the shoreline. One of the broadest is the all-encompassing “environmental limitations” criteria for the Rural Conservancy designation (pg. 29).

Now counted is the presence of “steep slopes” and/or “flood-prone” areas with no definitions, just a broad pass. The issue is the breadth of the characteristics and the variability in the interpretation.

We note that there are definitions in the Critical Areas act which already regulates us. The act provides a publicly established process for specifying such characteristics and there are standards for regulating them. In this increasingly regulated world, we question creating a new layer of regulation for an undefined purpose.

Currently, the Rural Conservancy’s “**environmental limitations**” broadly includes “***steep banks, feeder bluffs, or flood plains or other flood-prone areas***” (pg. 29). We note that “flood-prone” is similarly undefined in this document.

We have no idea what the designation purpose is for so broadly including “steep banks” and “other flood-prone areas”. We do know that this phrase can result in our property being characterized as hazardous. It also results in increased restrictions under the SMP. We are deeply concerned.

Meredith & Donovan Rafferty  
618 77<sup>th</sup> Ave NE  
Olympia, WA 98506

**From:** [Donovan & Meredith Rafferty](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** SMP Hearing Comment: Eliminate Daily Reporting  
**Date:** Tuesday, October 19, 2021 11:46:18 AM  
**Attachments:** [Rafferty Eliminate Daily Reporting PDF.pdf](#)

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We are submitting the attached comment to the SMP Public Hearing.

Thank you,  
Meredith & Donovan Rafferty  
618 77th Ave NE  
Olympia, WA 98506

October 19, 2021

TO: Thurston County Planning Commission

Andrew Deffobis  
Interim Senior Planner, Thurston County

FROM: Meredith & Donovan Rafferty  
618 77<sup>th</sup> Ave NE  
Olympia, WA 98506

RE: Over-regulating daily activities in using our properties

For shoreline property owners, daily use of their properties is comprehensively regulated by the Substantial Shoreline Permit. This expensive and complex process involving a hearing examiner is triggered by any disturbance of the property at an astonishingly low threshold of \$7,047 in project value. Yet the draft SMP intends to cover 100% of any activity, regardless of value. Even when a Substantial Development Permit is not required, any disturbance must be reported in advance to, in essence, “get a permit to not get a permit”.

We object. Clearly state in this SMP document that activities valued less than the substantial development permit threshold do not require any action, no daily reporting and no validating.

Meredith & Donovan Rafferty  
618 77<sup>th</sup> Ave NE  
Olympia, WA 98506

**From:** [Daniel Moffett](#)  
**To:** [Polly Stoker](#)  
**Cc:** [Andrew Deffobis](#)  
**Subject:** Thurston County SMP Comments  
**Date:** Tuesday, October 19, 2021 12:09:24 PM

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Planning Commission,

We have been at Lawrence Lake for more than 30 years.

I support these changes for the next Thurston SMP:

- 1) Ch 19.400.120. Buffer widths should stay as presented in this July 28, 2021, draft SMP. Shoreline Residential buffer widths should be 50-feet for both marine and lake properties...as they have been since the 1990 SMP, and longer.
- 2) Ch 19.600.160.C.1.r., Ch 19.600.160.C.4.f. and Ch 19.600.160.C.5. I agree with each of these Options. Strike the requirement for pier, dock, float or ramp grating on lakes that do not contain salmon.
- 3) Ch 19.600.160.C.3.b. I agree with this Public Hearing Option, *“Consider a shorter distance (than the specified 20-foot spacing) for spacing of residential pilings (supporting piers and/or docks) in lakes...”* 8-foot spacing is a move in the right direction; I would prefer to see 6-foot.
- 4) Ch 19.600.160.C.4.a. I agree with this Public Hearing Option...and more. The maximum width of single-use and joint-use piers should be 8-feet, and more if the applicant can demonstrate the need.
- 5) The Shoreline Environmental Designation (de facto, the zoning) of any property should not be changed to a more restrictive classification or added to the SMP jurisdiction without due process. I request that the changes that were made for residents of Lake Lawrence been adopted by the Planning Commission and Board of County Commissioners and extended to all properties in Thurston County. Some 2,700 properties are facing this new designation or re-designation. This issue must be resolved for each one of these properties before the SMP moves forward. Open House Fact Sheets #3 and #10 present some SED information, but nothing about how to determine your SED or to appeal a new designation.
- 6) Ch 19.400.100. The labeling of all existing legally built homes and/or accessory structures already located within the buffer should be “conforming,” not “legally non-conforming.” State law recognizes these structures as “conforming.” So should Thurston County. This is another critical issue.
- 7) Ch 19.400.120.D.1.b. and Appendix B, Section B.2.c. Decks and Viewing Platforms properly constructed to be pervious should not be required to be “...adjacent to residential structures...” There should be no limit on size or location and there should be no requirement for a shoreline variance to build such a deck.
- 8) Ch 19.400.120.D.1.e. I agree with the Option. Limit water-oriented accessory storage structures to residential uses only.

9) Ch 19.500.075 and 19.500.100.B.2. I agree with the Options: Substantial Developments Permits, Conditional Use Permits and Variances should be processed administratively rather than having to undergo a public hearing before the Hearing Examiner.

10) Ch 19.600.150. I support the option to prohibit industrial development in Shoreline Residential Environmental Designations.

11) Nothing in the Thurston County SMP should be more restrictive than State requirements.

12) A companion pamphlet must be completed simultaneously with the SMP to guide the public through the SMP requirements, including development restrictions, acceptable native plants for the buffer (with specific examples), and permitting requirements. Without the guidelines that the pamphlet can provide, property owners will be at a loss to understand the regulations, requirements and restrictions buried deep within the full-blown SMP document.

13) Staff has begun to acknowledge that different environmental conditions exist for a) marine waters, b) streams/rivers and c) lakes in the County...and amending the SMP to address those differences. Yet, even more is required. Establish fresh water (lake) requirements for decks, docks, piers, floats and bulkheads and address the unique habitat characteristics associated with shoreline residential use. Maximum dimensions must be increased for single use piers, and floats (both mooring and recreational) in Shoreline Residential SEDs; docks with their piers, ramps and floats on lakes are places of water access for swimming, fishing and other water-oriented family play and enjoyment.

14) In the SMP, *Buffer* is defined as “*a non-clearing area established to protect the integrity, functions and values of the affected critical area or shoreline...*” What if your waterfront yard is a lawn? Is it a buffer? ...a setback? This needs to be clarified.

15) Several changes should be made to the chapter “Definitions.” Examples include - Add: *Conforming, Eutrophic Lakes*, and *Letter of Exemption*. Delete: *(Legally) Nonconforming*.

16) There are several Unnamed Lakes, Unnamed Ponds and Unnamed Mines listed in Ch 19.200 as lakes now subject to the County’s SMP. How are property owners adjacent these lakes, ponds and mines going to know that they are now subject to this new designation?

Without names, known to all, these water bodies should not be included in the SMP jurisdiction.

17) In the policy statements, Ch 19.300, and development standards, Ch 19.600, concerning public access to publicly owned areas of the shoreline, there is no mention of ADA compliance. Why not?

18) Pollution of Thurston County waters is only addressed in passing in the in this draft SMP...whether that pollution comes from:

- a) Faulty or inappropriately located septic systems,
- b) Use of inappropriate lawn and/or garden fertilizers, and/or
- c) Stormwater runoff directly into the County’s marine waters, lakes and rivers should not be allowed. For example, here on Long Lake there are thirteen outfall pipes that drain from County roads into the lake...most of these outfalls drain directly into the lake with no pretreatment. Stormwater runoff accounts for 75% of the pollution of our waters.

19) The Planning staff should provide new goals for the use of plastics by the shellfish industry on Thurston County tidelands and to establish new operational guidelines.

Thanks for letting comment on this SMP topic.

Dan Moffetf

Sent from my iPhone



**From:** [Shad Pruitt](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** Comments - SMP - For Public Hearing (10/20/2021)  
**Date:** Tuesday, October 19, 2021 12:22:31 PM

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**NAME:** Shad Pruitt

**EMAIL:** [shad.pruitt@comcast.net](mailto:shad.pruitt@comcast.net)

**PROPERTY:** Long Lake

Dear Mr. Deffobis

Thank you for the opportunity to provide comments on the draft Shoreline Master Plan (SMP).

Specifically, I am concerned with the proposed increase of the shoreline buffer for lake properties to 75 feet. I strongly believe the shoreline buffer should remain at 50 feet for the following reasons.

1. Changing the buffer from 50 to 75 feet will have a negative impact on any new construction or remodeling projects for both existing and new lake property owners as compared to their neighboring properties. Such a change would result in unequal treatment of neighboring property owners based solely on the date of their (a) property acquisition or (b) receipt of approval for construction projects related to home improvement, remodeling or re-building.
2. As you are aware, lake properties are mostly built out. And, as a result, these areas have relatively less ecological function than more intact areas. Since lake properties are essentially built out, changing the buffer will have virtually NO impact to shorelines for several generations to come. These properties have very low turnover and significant construction projects are few and far between.
3. And, finally, I am also unaware of any scientific data that suggests increasing the shoreline buffer from 50 to 75 feet will results in profound change.

Instead of increasing the buffer for lake properties, please consider pursuing alternative lake shoreline strategies, within the existing 50 foot buffer requirements, to mitigate risks that will actually have a meaningful ecological impact in the near term. Thank you for your consideration of my comments.

**From:** [Polly Stoker](#)  
**To:** [Ken Bruce](#)  
**Cc:** [Andrew Deffobis](#)  
**Subject:** RE: SMP email  
**Date:** Tuesday, October 19, 2021 12:34:25 PM

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Thank you for your comment. I have copied Andrew Deffobis to ensure he includes this in his written comment documentation for Planning Commission.

*Polly Stoker*

Thurston County Community Planning &  
 Economic Development (CPED)  
 360-786-5473  
 Cell 360-972-6785  
[stokerp@co.thurston.wa.us](mailto:stokerp@co.thurston.wa.us)  
 2000 Lakeridge Dr SW  
 Building One, 2<sup>nd</sup> Floor  
 Building Development Center

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**From:** Ken Bruce <brucefamily5@live.com>  
**Sent:** Tuesday, October 19, 2021 12:26 PM  
**To:** Polly Stoker <polly.stoker@co.thurston.wa.us>  
**Subject:** SMP email

I'm sending this in support of the Lake Thurston SMP team.

1. Buffer widths (Issue #2 in coalition letter) for lakes to remain as they were in the 1990 SMP . If this particular issue is changed to what the county staff want most of you will have your properties (on the lake/canal/community beaches) seriously impacted.
2. Pier, Dock, Float or ramp grating (Issue #7 in coalition letter) we want the option to exclude expensive grating for lakes that do not contain salmon.
3. Pier and Dock pilling spacing (Issue #8 - in coalition letter) we want the option to reduce spacing to 8 feet.
4. Pier and Dock Width (Issue #9 - in coalition letter) we want the option to be able to make our piers/docks 8 feet wide or more if applicant can demonstrate need.
5. Shoreline Environmental Designations (SEDs) (Issue #12 in coalition letter) we want the changes we were able to make for residents of Lake Lawrence adopted by the Planning Commission and Board of County Commissioners.

**From:** [Thurston County | Send Email](#)  
**To:** [Andrew Deffobis](#)  
**Subject:** Lk st Clair environmental zone  
**Date:** Tuesday, October 19, 2021 3:56:21 PM

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This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Andrew Deffobis**

Subject:

From: **Barry Krueger**

Email (if provided): **Xbreadman15@gmail.com**

Phone: (if provided): **3604803635**

Message:

**What is the environmental zone? When I was trying to build on Lk st Clair 23 yrs ago I found out the setback was 100 '. No one at county could tell my why since the rest of the Lk was 50'. Took me over a year for shoreline variance to get it reduced to 73'. At the last meeting you said you have never heard of it. My house had to be much smaller because of this. Now is the time to reverse this. All the lakes should have the same setbacks. I'm on ramblewood In which is 100' setback also known as goat lake section of the lake. Time to change this since nobody at the county has been able to tell me why it was ever deemed 100'.**

**From:** [72lr88@comcast.net](mailto:72lr88@comcast.net)  
**To:** [SMP](#)  
**Subject:** Incoming SMP Comment  
**Date:** Tuesday, October 19, 2021 4:56:00 PM

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**Your Name (Optional):**

**Your email address:** 72lr88@comcast.net

**Comment:** I believe that all shellfish farming should be eliminated. It is destroying the beaches, visually and ecologically. We have picked up 1,000's of pieces of shellfish farming debris on only a couple hundred feet of shoreline on Eld Inlet. We used to have smelt, sand dollars, and many other forms of marine life that have disappeared. The County seems to be preoccupied with septic systems while ignoring the negative effects of shellfish farming. I believe it is critically important to focus on controlling septic effluent to prevent damaging water quality, but ignoring negative environmental effects of intensive shellfish farming is a dereliction of responsibility on the part of the County. Shellfish farming is turning residential areas into commercial zones with disturbances going on all hours day and night. Most industries have limitations as to the hours they work and the noise they cause when adjacent to residential property. The commercial shell fish operators appear to have none of these restrictions. It seems the County also wishes to restrict housing structures proximity to the water and maintain vegetative buffers between the structures and the water in order to enhance the views from the water, while ignoring the extremely negative visual impact of geoduck PVC tubes, nets, and floating structures loaded with PVC tubes and other equipment. Some of these structures (docks and boats) sit in front of your property for weeks or longer and are even lighted at night.

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Time: October 19, 2021 at 11:55 pm

IP Address: 67.168.188.118

Contact Form URL: <https://thurstoncomments.org/comment-on-the-proposed-shoreline-code-update/>

Sent by an unverified visitor to your site.