

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	General Feedback / No Specific Section	Change Requested	Various suggestions for specific additions and edits to the language throughout the chapter. <ul style="list-style-type: none">• Aquaculture should not be exempt• Disagree with the issuance of aquaculture permits by type of use for multiple properties/landowners because of varying conditions.• Thurston County needs knowledge of all aquaculture operations to implement this policy• Need a description/definition of “exempt development” and examples• Need a description of the existing baseline for cumulative impact	Comments have been forwarded to the planning commission. Suggestions for specific edits have been taken into consideration in drafting the update. Aquaculture is not exempt from the SMP.	Pending / Item for Discussion
2	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Will this PowerPoint be posted on-line?	Yes	No Action Required
3	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Will Ecology come to future meetings?	Yes	No Action Required
4	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Will Board of County Commissioners be coming to future meetings?	Probably not, they have their own public process that will take place following the Planning Commission process.	Public Participation/Engagement
5	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Who makes the final decision on the SMP?	BoCC will adopt the document, Ecology then needs to approve it.	No Action Required
6	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Is “no net loss” set on lake elevation? Example: Lake St. Clair rising water level.	No, it is based on existing habitat and zoning.	No Action Required
7	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Other	What is the podium for tonight?	For statements you’d like to make.	Public Participation/Engagement
8	17-Oct-17	Doug Karman, resident of Lacey, President Long Lake Association.	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	As far as the timeline slide, where are we?	At the beginning, at the next meeting it will cover specific chapters 19.100-19.200.	No Action Required
9	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Other	When will the stakeholders talk about chapters 1-2? He will do a push in the Long Lake association newsletter for people to attend.	Taking comments on all chapters but hope to get to comments on 19.100-19.200 with Community Stakeholder Group at the 11-30-17 meeting.	Public Participation/Engagement
10	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Who is considered special interest groups? Stakeholders?	Lake groups, real estate groups, Master Builders, shoreline home owners, etc.	Public Participation/Engagement
11	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Would you come to an HOA meeting?	Yes	Public Participation/Engagement
12	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Corridors limbing skirting within your 200 feet SMP distance?	Any tree within that buffer.	No Action Required
13	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Define danger tree.	A: Defined in code but can’t develop in such a manner to cause danger trees.	Development Regulations
14	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	20 years ago, no permit was obtained, what happens to that?	A: Prior to 1969 is overwater structures grandfathered in; since 1969 is not.	Development Regulations
15	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Prohibited dredging?	Dredging is currently proposed to be prohibited in the Natural shoreline designation and require a Conditional Use permit in other areas.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
16	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	SMP implementation date?	A: We don't know yet.	Future Discussion Item
17	17-Oct-17	Cari Hart, resident of Summit Lake	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	All Puget Sound will be mandated soon regarding affluent septic issues.	Comment received and directed to Senior Planner Brad Murphy for further research.	Future Discussion Item
18	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Is there an existing SMP to look at, when was it adopted last? Mining means what?	A: For Thurston County, in 1990.	No Action Required
19	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Other	Is this draft SMP in the same format? How can we tell the changes?	No, it is totally different. Total rewrite based on changes to the Shoreline Management Act at the state level.	No Action Required
20	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Do you have this draft SMP on the website? Has it changed lately?	Yes, and it hasn't changed in a couple of months.	No Action Required
21	17-Oct-17	Bob Frasier, resident of Lake Pattison	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	What about the lily pad problem? The shoreline is gone so that you can't even launch a boat. Is that covered in the master plan?	Project by project determination. Vegetation management is allowed but need permit to apply herbicides and must meet no-net-loss of ecological functions. Hand/mechanical removal is allowed. For invasive/non-native plants see Chapter 17.10.010 RCW and WAC 16-750-003	No Action Required
22	17-Oct-17	Dave Allison, resident of Lake Pattison	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Will this raise property taxes to implement? In Chapters 2-7 it keeps mentioning "public areas". Who is policing these areas?	No, should not raise taxes to implement. Depends on location as to who polices the areas.	No Action Required
23	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	How early could the draft designation be firmed up? It is hard to comment on "nothing firm" yet. Questions about the Planning Commission process? Who do we direct comments to?	Comment received and directed to Senior Planner Brad Murphy for further research.	Future Discussion Item
24	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	BoCC issue in the past where they can't hear about things because they are still the authority.	BoCC will have review process following Planning Commission process.	No Action Required
25	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	How many in the technical group? Planning Commission? What percentage are lake front home owners?	10-11 on Regulatory Group, PC- 8 currently (9 total but as of 10-17-17, one spot is unfilled), don't know.	No Action Required
26	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Mitigation for a variance sounds like dollars to me. Has there been a study in increased revenue to the county?	Mitigation monies would be to do the mitigation for unavoidable impacts and would not go to the County. A programmatic mitigation option could be available where a group would hold funds for mitigation but all monies would be for the implementation of the mitigation work and mitigation program.	No Action Required
27	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	As a homeowner trying to explore the impact the SMP versus the county. Lake a substantial shoreline permit? Does the county say everything has to be up to code? The \$7,500 question.	Normal maintenance and repair is allowed but building code may require that other portions of the house/parcel be looked at to insure building code is being followed. \$7200 is the value for an exemption from a shoreline substantial use permit (see Chapter 19.500)	No Action Required
28	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	The \$7,500 question, what's excluded? Inside, irrelevant, outside, question?	Current proposal would be to allow normal repair and maintenance with exemption letter if exemption criteria in Chapter 19.500 is met. Remodel and rebuild options also available for existing footprint of existing house.	Pending / Item for Discussion
29	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Is the \$7,500 for a contractor to do it or just materials?	See Chapter 19.500 for exemption criteria.	No Action Required

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
30	17-Oct-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Read carefully the first page. How does moving the setback from 50 feet (current code) to 75 feet (draft) enhance the purpose and intent of the ordinance? Regarding the non-confirming issue, suggests doing what Lacey did. Regarding community meetings, have the Planning Commissioners been invited? He did not see a notice in the Olympian.	Notice was sent for the meeting and will also be sent for future meetings as well as web-mailings. Other portions of question will be discussed as we move through chapters.	Pending / Item for Discussion
31	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	When will the Planning Commissioners hear about the draft SMP?	Throughout the next few months of meetings.	Future Discussion Item
32	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Other	There is already confusion now with current planners. What’s it going to be like with all of these changes?	Current planners were included in the development of the draft document. They will be included in the review process as well.	No Action Required
33	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	This document will be proposed at one sitting and adopted all at once?	Yes, after a lengthy public review process is followed. Once we get through the review of the Chapters and complete all the appendices the Planning Commission will hold a public hearing after which they will recommend for approval a version which will then go to the Board of County Commissioners for their review and public process. They will have a public hearing where they will afterward adopt a local version of the SMP which then goes to Ecology for state approval. After Ecology approves then the plan is implemented. For questions on current projects, the answer comes from the 1990 adopted SMP.	No Action Required
34	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Would like to not be called “none-compliant”. It sounds negative. Please use the term grandfathered instead.	Looking into other terms to use instead of non-conforming.	Pending / Item for Discussion
35	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Using the 1990 plan, why are we changing it anyway?	Due to changes at the state level on the content of the Shoreline Management Act (RCW 90.58).	No Action Required
36	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	What do you mean by no net loss? Why not use “impact” instead?	No net loss is the terminology used in the RCW’s and WAC’s related to the Shoreline Management Act.	No Action Required
37	17-Oct-17	Townsend	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	105 Use and Modifications Matrix	Policy Question	Has trouble with the “no net loss” concept. Don’t need the problematic net loss like geoduck farming. The carve out for the geoduck farms now will only be a conditional use permit. Why is there suddenly a carve out for them? Furthermore, aquaculture is “the” preferred use, versus “a” preferred use. Can you confer with the county’s legal team regarding substantial use permit versus a conditional use permit? He believes the 200 foot buffer should go in both directions, not just inland. This group would like to come to Brad’s next geoduck meeting he mentioned tonight.	SMA calls for geoduck aquaculture to be a Conditional Use permit.	No Action Required
38	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	50 foot to 75 foot, what’s a setback versus the 200 foot buffer? Explain please.	The 200 foot demarcation is what falls under shoreline jurisdiction. The buffers (proposed 50 foot, 75 foot, etc.) then relate to specific shoreline use designations (shoreline residential, natural, rural conservancy, etc.) and there will also be buffers related to critical areas (wetlands, streams/riparian areas, floodway, steep slopes, etc.) that are in addition to the shoreline buffer setbacks. All shoreline parcels will have a shoreline buffer/setback based on shoreline use/environmental designations but not all parcels will have critical areas they will need to protect with critical area buffers.	No Action Required
39	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Where does the 75 foot buffer come from? So we were conforming when we bought the property, and now we are not. Where did it come from?	Trying to be more consistent with CAO.	No Action Required
40	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Except for the homes going back to 1975, you can’t even build a storage shed within 50-75 feet.	Comment received and directed to Senior Planner Brad Murphy for further research.	Future Discussion Item
41	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Who is here tonight from the Planning Commission?	Jim Simmons	No Action Required

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
42	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Can there be relief for newly non-conforming? A higher level of maintenance and repair without a comprehensive permit? This takes time and money.	Looking at terminology and options for flexibility with existing “non-conforming” structures.	Pending / Item for Discussion
43	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Change predator exclusion? It should actually be called wild life exclusion.	Can look at different terminology	Pending / Item for Discussion
44	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	\$7,500 is a low amount, a roof would be \$12,000.	That dollar amount is determined in the WAC Closer to \$7200	No Action Required
45	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Is it per year? Cumulative?	By project.	No Action Required
46	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Are you going to have the personnel for all of these new permits?	Will be discussed with BoCC.	Pending / Item for Discussion
47	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	The wording regarding permits is confusing. Using the term “development” shouldn’t be used for things inside or already there. This needs to be defined better and make clear.	Substantial Development is defined in the RCW and WAC and is the term used in both. We have to follow state law and code. We will have definition in SMP.	No Action Required
48	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Are the comments being recorded to be discussed in the future?	Yes, topics will be discussed as they relate to the chapter topics of the SMP.	No Action Required
49	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	Is the 75 foot buffer chiseled in stone? How does getting a permit for things on the inside detract from the shoreline?	Nothing in stone at this point all is draft and we are taking comments on the draft which will be passed on to the Planning Commissions and Board of County Commissioners.	Pending / Item for Discussion
50	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Policy Question	the discussion with bankers, etc. regarding the term “non-conforming”. Do we have to disclose this if we sell our property?	Not sure.	Pending / Item for Discussion
51	17-Oct-17	Anonymous	Open House	AA_General_Fee dback	General Feedback / No Specific Section	Other	How many own waterfront property on the BoCC?	Not sure.	Pending / Item for Discussion
52	18-Aug-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Hi Brad, Will there be a chance at the September 12 BoCC briefing to speak/ask questions or present testimony after your presentation? Thank you,	Forwarded to Planning Commission.	No Action Required
53	24-Sep-18	Sam Merrill, Black Hills Audubon Society	Email	AA_General_Fee dback	General Feedback / No Specific Section	Support	General Support for "no net loss" regulations.	Support recorded for no net loss, serves as evidence of support in future discourse.	Public Participation/Engagement
54	24-Sep-18	Sam Merrill, Black Hills Audubon Society	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Support	Buffers. Maintain the 2017 (not 7/2018) draft SMP standard buffer widths or setbacks, without modification. This applies to Shoreline Environmental Designations, vegetation conservation, and other areas.	PG 45 of 2018 Draft: Shoreline Residentail (50 feet), Urban Conservancy (125 feet), Rural Conservancy (150 feet), Natural (200 feet), Standard Buffer (250 feet)	Pending / Item for Discussion
55	24-Sep-18	Sam Merrill, Black Hills Audubon Society	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Mitigation. Encourage long-term net gains in both planning-level decisions and site-specific design detail. Require compensatory mitigation to occur in the same or related habitat area.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
56	24-Sep-18	Sam Merrill, Black Hills Audubon Society	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Other	Aquaculture. Aquaculture’s use of shorelines must be consistent with the regulations of the Shoreline Management Act, the Shoreline Master Program, and Best Available Science. Under current practice, the pervasive use of plastic by the aquaculture industry will increase with industry expansion. Geoduck mitigation practices, when based on Best Available Science, are known to reduce risks to birds and other wildlife.	Per Planning Commission meeting 2018.10.11, specific SMP draft discussion to involve stakeholders from environmental groups, aquaculture industry representatives, biology (WA Ecology where possible) experts, and residents, to explore plastic management and aquaculture practices. Aquaculture Application process requires an operational plan.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
57	24-Sep-18	Sam Merrill, Black Hills Audubon Society	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Advocate the use of mitigations methods to reduce: <ul style="list-style-type: none">• Avoid plastics in aquaculture when possible• limit the use of predator control area netting• change geoduck aquaculture procedures during site preparation and harvesting• limit scraping, dredging in the benthic (ocean floor)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
58	30-May-18	Harry Branch	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	E-mail on an appeal for the Westman Mill development. Communicates displeasure.	Unrelated to specific SMP feedback.	Not Related / Not in Our Control
59	30-May-18	Heather Burgess	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Concerns on 19.400.100 lack of provisions for the expansion, alteration, or remodeling of existing structures that will be rendered non-conforming due to SMP. Recommends something similar to Lacey and Olympia. https://www.ci.lacey.wa.us/Portals/0/docs/community_development/planning_documents/part_1_2015_update_to_SMP_2011_final_version.pdf Separately, reviews setbacks for freshwater lakes containing shared jurisdiction with all three Cities for consistency of approach.	Staff Responded. Comments integrated into SMP Draft and presented at Planning Commission meeting 10.10.2018. Olympia lake setbacks vary for residential (ex/ Ward Lake is 75 feet and Ken lake is 30 feet). Lacey is 50 feet.	Pending / Item for Discussion
60	30-May-18	Maureen Canny	Email	AF_General_Regulations_400	100 Existing Development	Support	Please do not reduce the SMP buffers in your new plan.	Support recorded for minimum desired buffers, serves as evidence of support in future discourse. Forwarded to Planning Commission.	Pending / Item for Discussion
61	15-Oct-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Hi Brad, Can you give me a quick definition/explanation of Reduced Buffers and Standard Buffers? ...and how do they relate to the buffers that we now think we know? Thanks a lot, John Woodford	Staff responded and answered Q's. Forwarded to Planning Commission.	No Action Required
62	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Letter on intent of coalition to participate as members of the Regulatory Group and Stag Group.	Staff invited group to Regulatory Group and Stag Group meetings. Groups now defunct. Forwarded to Planning Commission.	No Action Required
63	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	110 Purpose	Change Requested	It is recommended that a new section/paragraph be inserted as "SMP Goals". Goals should be solicited through the public review process. Paragraph also states the purpose of the SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
64	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	110 Purpose	Policy Question	"Future development of the shorelines..." It should be noted that in the 27 years since the last SMP update that Thurston County's shorelines have shifted from undeveloped to developed and that the thousands of homeowners with existing homes require recognition by their local government of their existing status and be assured of stability and reasonableness of oversight.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
65	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	110 Purpose	Change Requested	Request to include private property owners as a special interest group.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
66	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	110 Purpose	Change Requested	Request to update the reference to ESHB to the current WAC: WAC 173.26.221 (2)(a)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
67	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	120 Applicability	Change Requested	Request to specifically enumerate the exceptions listed in 19.500.100.3 and elsewhere to the applicability section. Note that the excepts are listed in the same chapter.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
68	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	120 Applicability	Change Requested	Update "combined shoreline permit" language.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
69	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	130 Governing Principles	Change Requested	"Governing Principles" carry the weight of legal determination yet the wording throughout this section is vague for legal purposes and the paraphrasing changes intent from the state law of WAC 173.26.186 Governing principles of the guidelines. It is recommended to instead have a brief statement, provide reference to WAC 173.26.186 as providing the Governing Principles.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
70	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	130 Governing Principles	Change Requested	Section C wording results in paraphrases and revisions of WAC 173.26.186 which substantially change the intent and coverage as legal principles for the County to apply. C1,2,3,4 should be replaced by the WAC's language. Why do you have to use the word "Protecting"? We are way past protecting and into managing the shoreline. It should be our goal to manage not protect. When you protect, you can negatively impact many different plants, animals and people.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
71	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	130 Governing Principles	Change Requested	Provide a cited reference to the standards and definitions regarding "no net loss" and distinguish "no net loss of shoreline ecological functions" vs No net loss of shoreline ecological functions and processe on a programatic basis".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Part of a continued discussion on the "no net loss" policy. Planning Commission on 2018.10.17 concerned about monitoring and implementation logistics.	Future Discussion Item
72	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	130 Governing Principles	Change Requested	State law in WAC requires the County to counteract cumulative effects by ALL. The words "exempt development" directly target residential repair and maintenance and bulkheads and "Cumulative effect" should be addressed in those sections in detail. "Fairly allocating the burden...among development opportunities" is vague and should instead be addressed in subsequent sections in specific provisions. Also: "Cumulative effect" should be addressed for each type of use, including Aquaculture.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
73	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	130 Governing Principles	Other	This does provide a reference and it is noted that Appendix C is not available for public review.	Appendix C since drafted and made available to the public. Forwarded to Planning Commission.	No Action Required
74	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	100 Abandonment	Change Requested	Abandonment: This is not a required SMP definition according to RCW and WACs. It is added by the County. Why is it needed in this SMP? Why is it set at one year? Does it apply to uplands and tidelands?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
75	17-Nov-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AC_Definitions_150	105 Accessory use or accessory structure	Change Requested	Accessory use or accessory structure: What are the intended differences between “accessory structures” and “appurtenances”?	Both items defined in 19.150 Definitions. Accessory structures are structores that are incidental to the principal building, a structure located upon the same lot. Appurtenance structures are developments necessarily linked to the use of a single family residence (ex/ garage, driveways, fences, etc). Forwarded to Planning Commission.	No Action Required
76	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	110 Accessory Structure - View Blockage	Change Requested	Accessory structure - view blockage: While this definition appears to address upland structures, an additional view Definition is needed for tideland structures which may be short in height but impact quality of views by properties paying taxes based upon their views.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
77	17-Nov-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AC_Definitions_150	145 Appurtenance	Change Requested	Appurtenance: structures and development: Because the words “and development” were added, the examples should include other forms of development such as patios, paths and walkways, gardens, sheds, landscaping walls, boats on trailers, etc.	A list of examples was added to the definition. Forwarded to Planning Commission.	No Action Required

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
78	17-Nov-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AC_Definitions_150	170 Best Management Practices	Change Requested	Best Management Practices: Add shorelines and clarify if it is intended to deal only with stormwater	Shorelines implied by "water bodies". Not intended to deal only with stormwater: "...such sources into stormwater and water bodies."	Pending / Item for Discussion
79	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	195 Buffer	Change Requested	Buffer: Per 19.100.110 paragraph 1 "the purpose of the Master Program is to guide the future development ..." Therefore, buffer as defined here would apply to that purpose and should be so stated. It would not apply to already developed property. So you need to insert undeveloped property in this case. If you need to give a buffer for developed property you need an additional definition and remove the words "non clearing area".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
80	17-Nov-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AC_Definitions_150	195 Buffer	Change Requested	Buffer: Add: "...on undeveloped property"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
81	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	210 Bulkhead	Change Requested	Bulkhead: The definition needs to cover bulkheads for commercial and governmental properties as well as existing single and future single-family residences.. While there is a required WAC definition of Shoreline Modification, this definition of bulkhead is the County's. For residences, suggest "the OHWM for the sole purpose of protecting an existingsingle-family residence, and appurtenant structures and waterfront land from loss or damage by erosion."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
82	17-Nov-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AC_Definitions_150	245 Conditionaonal Use Permit (CUP)	Change Requested	Requested Add: Conforming. Add a definition of "Conforming" for legally established single family residences and their appurtenances which were established prior to the effective date of the ACT, and this SMP update per RCW 90.58.620. Rule WAC 173.26.241 (3)(j)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
83	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	270 Cumulative impacts or cumulative effect	Change Requested	Cumulative impacts or cumulative effects: Deletion of conditional. "Cumulative" is a significant new concept in this update with significant legal interpretations. We recommend using the wording of the WAC.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
84	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	280 Development	Change Requested	Development: Return to the State definition. The consistency of the definition for "Development" is critical for 19.150.145 - 19.150.180 - 19.150.285 – 19.150.770 and subsequent chapters of this SMP. "Development" is used in various ways throughout the SMP:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
85	17-Nov-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AC_Definitions_150	285 Development Regulation Standards	Change Requested	Development Regulation Standards: "Development" is already defined as a use. See comment about 19.150.230	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
86	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	300 Ecological Functions	Change Requested	Ecological Functions: This is an inadequate and confusing definition. In order to administer the Program there needs to be an appendix that lists the "Ecological function" and what each function does. This cannot be left up to the SMP plan checker. We understand that this is the definition provided by Ecology. However, it still needs further explanation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
87	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	305 Ecologically Intact	Change Requested	Ecologically Intact: This is not a required definition. If it is to be inserted, it would primarily apply to undeveloped property as opposed to developed property. In addition, without knowing what Ecological Function means how can you determine if a shoreline is Ecologically intact. Also, why is Ecologically intact better than historically intact. Again, you are implying that improving Ecological Function is needed to achieve "No Net Loss". This is not the case on a site by site basis.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
88	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	335 Excavation	Change Requested	Expansion/Enlargement of Single-family residence or accessory structure: Insert a new definition: "Expansion/Enlargement of Single-family Residence or Accessory Structure: The Administrator may grant a one-time Administrative Approval for an enlargement, expansion or addition to a legally Conforming or grandfathered single-family residence or accessory structure that would not otherwise be allowed under this Program if all of the following criteria are met: a. The enlargement or addition does not expand the total footprint of the existing structure by more than 500 square feet.]	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Recent proposals from planning have included more options for enlargement and/or development of built environment in shoreline residential areas.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
89	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	335 Excavation	Change Requested	Expansion/Enlargement of Single-family residence or accessory structure: Insert a new definition: b. The expansion or addition does not adversely impact critical areas or significantly impair the ability of a substantial number of people to view the shoreline. c. The structure is located landward of the ordinary high water mark. d. No waterward enlargement or expansion beyond the existing structure's footprint will occur.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Recent proposals from planning have included more options for enlargement and/or development of built environment in shoreline residential areas.	Future Discussion Item
90	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	555 Mining	Change Requested	Mining: Insert a new definition: "Mitigation Bank: The actions the property owner has done to improve shoreline function on their property since the Act was approved. Mitigation Bank can be used to offset future required mitigations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
91	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	590 No Net Loss	Change Requested	No Net Loss: The SMP needs to provide standards for determining "No Net Loss". What is to be considered as a loss, as a gain and from what baseline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Part of a continued discussion on the "no net loss" policy. Planning Commission on 2018.10.17 concerned about monitoring and implementation I	Future Discussion Item
92	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	600 Normal Repair	Change Requested	Normal Repair: Normal Repair and Maintenance are critical definitions that can make the difference between having to go through a Substantial Development Permit with a hearing examiner, or not. Furthermore, these are required definitions set by RCW and Ecology. We ask that more review time be allowed to explore how these definitions fit the everyday needs of property owners.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
93	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	600 Normal Repair	Change Requested	Why use the word development. A prudent person would not put maintenance and a development together. Especially since the purpose of the SMP as stated in 19.100.110 is to guide future development. Normal maintenance and repair are not future development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
94	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	600 Normal Repair	Change Requested	The determination of "causing substantial adverse effects" will now be addressed through the mitigation process and goal of no net loss. This "adverse effects" language is not needed in this definition and may even be contradictory to other processes and considerations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
95	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	630 Predator Exclusion	Change Requested	Predator Exclusion: This is not a required definition. It should be deleted from the SMP. It is an industry-specific term used in operating practices without basis to be established by the SMP. Also, "activity" is not defined and could include pesticide application and digging and dredging of tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
96	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	655 Qualified Professional or Qualified Consultant	Change Requested	Qualified Professional or Qualified Consultant: Where does it define the credentials for the individual working for the County that can stop or critique a proposal/project? Where does it provide the ability for the Qualified Professional or Qualified Consultant to trump a perceived requirement without having to spend a ton of money through the appeal process?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
97	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	675 Residential Development	Change Requested	Residential Development: the wording "accessory uses and structures" is used here but in SMP 19.150.145, the word is "appurtenances". Are they intended to be the same? This definition affects interpretation of “normal maintenance and repair” and whether existing uses and structures and “development” are conforming.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
98	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_1 50	695 Setback	Change Requested	Setback: This is the distance from the shoreline to the structure. It has nothing to do with the buffer. This indicates that the setback starts at the buffer so a prudent person would assume you would have to double the setback or the buffer. In addition you are implying that being in the space created by the setback is causing some net loss to the ecological function. The setback is not the buffer and the buffer is not the setback. In addition, "setback" is not a required definition that we can find, so you have latitude in changing it.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
99	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	720 Shoreline Stabilization	Change Requested	Shoreline Stabilization: This is not the case on lakes. You need to provide different definitions based on type of shoreline. Even in the marine environment there are different needs in bays, main channels and estuaries. With teak skiing and surfing the new ballast boats produce 3 - 4 foot waves going 10 miles per hour. The "soft"-scapes wouldn't last a weekend let alone be in tact after one winter of flooding.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
100	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	770 Substantial Development	Change Requested	Substantial Development: Again, the use of the word "development" goes back to 19.100.110 which is referring to a major project not a remodel or maintenance which is implied by the \$6416 figure. Choose another word and insert the exclusions. A prudent person would not think painting their home or remodeling their kitchen as being a development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
101	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	810 Vegetation, Native	Change Requested	Add Vegetation, Non-native: Add a new definition for Non-native Vegetation. There are many non native or highbred plants that can perform the function of the native plants without being invasive.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
102	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AC_Definitions_150	825 Water-Enjoyment Use	Change Requested	Water Enjoyment Use: Why do you exclude use by the single family resident/parcels? If this is to be covered elsewhere, then the title should be Water-Enjoyment General Public Use. While this is a required definition, discussion should be started with Ecology to change it.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
103	17-Nov-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Our comments on the chapter for the Shoreline Environmental Designations (SEDs) are for greater clarity, particularly in the management policies for each SED. These are of course the basis for the subsequent regulations and are covering aspects that are new to all of us. Therefore, we may need to submit additional comments on this chapter, which we understand from staff is expected and welcome. We find we must consider this chapter in conjunction with future chapters, such as 19.600, to understand the full intent.	Forwarded to Planning Commission.	No Action Required
104	5-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	A. Because of its phrasing, this statement ends up being more expansive than required by statute. Recommend Dept. of Ecology wording: The SMA applies to the following shorelines of the state [RCW 90.58.030] in Thurston County. Where are the “not typical” exceptions or exemptions explained? Optional [jurisdiction] to who? Redline edits made.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
105	5-Dec-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	C. This jurisdiction should extend 200 feet from the landward edge of the associated wetlands. This would reduce confusion and overlap of jurisdiction. The CAO specifically states that the wetlands associated with shorelines belong to the SMP	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
106	5-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	Shoreline Environment Designations: protect our shoreline resources and manage their use effectively... The relationship of the SMP to coordinate and reflect the Comprehensive Plan is already stated in the SMP at 19.100.110. Also, a few paragraphs later, the SMP explains its uniqueness from the Comprehensive Plan: “The shoreline environment designations are not intended to be land use designations. They do not imply development densities, nor are they intended to mirror the Comprehensive Plan designations. The system of categorizing shoreline environment designations is derived from Chapter 173-26 WAC.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
107	5-Dec-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	Shoreline Environment Designations: Since the County SMP is intended for unincorporated Thurston County, why are we referring to local planning of cities? Or are you referring to the Comprehensive Plan?shoreline environment designations is derived from Chapter 173-26 WAC.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
108	5-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Shoreline Residential: A. Add the word “use” and clarify that “development” is residential. Which definition of “development” is being used? The definitions in Chapter 100 vary and affect application of the SMP in these later sections. Aren’t appurtenant structures part of development? Why are they being singled out here? Are other structures not going to be accommodated? Minor edits	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
109	5-Dec-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Shoreline Residential: C.1. Should these be included: setbacks, buffers or yards; area; bulk; height or density?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
110	5-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Shoreline Residential: C. Why would unlimited Commercial development be allowed in a Residential SED with an underlying GMA residential designation? Instead: “Commercial development is limited to providing public access and recreational water-enjoyment uses and is subject to the following criteria ---(need to define these criteria).” This means the matrix in Chapter 600 needs to be revised. Minor edits	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
111	5-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Change Requested	Aquatic: B.C. Language edits Dealing with lands under the water requires its own management policy to reflect factors of private ownership, state ownership, federal ownership, protected species, impacts upon upland use, etc. ...address aesthetic impacts and degradation and blocking of public and residential views, ADD New structures and development on marine tidelands within the SMP jurisdiction are subject to the following: (needs to be defined) ADD New structures and development on lands under fresh waters within the SMP jurisdiction are subject to the following: (needs to be defined)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. The 2018 SMP draft includes accessory structure-view blockage. Discussion to include aesthetic impacts.	Future Discussion Item
112	5-Dec-17	Shoreline Stakeholder Coalition, Unknown Individual	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Change Requested	Aquatic: C.5. What is definition of "use or modification"? Are the exclusions in 500.100.C.3 included here? Why is a procedure listed here?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
113	5-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	145 Map Boundaries and Errors	Change Requested	Map Boundaries: B2. Parcels with tidelands will have more than one designation: Residential and Aquatic. This situation should have its own item description here, such as “A parcel which includes tidelands will be assigned a designation landward of the OHWM and a second designation waterward of the OHWM.. ADD: A parcel which includes tidelands will be assigned a designation landward of the OHWM and a second designation waterward of the OHWM	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
114	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	Add goal: “Policy SH-2 Preserve the natural character of the shoreline”: Actively support programs which recognize the stewardship role of the County’s thousands of shoreline residential owners and promote their voluntary management of their shorelines such as through incentives, education, and community activities. Possible change to water quality goal: One proposal from a home owner’s perspective would be to receive mitigation credit for voluntarily improving a property’s environmental aspects before a major project and be able to build those credits to apply to a major project later. For example, a legal structure could be voluntarily removed or approved vegetation added as part of the home owner’s ongoing use. The home owner would receive credit that would be applied in a future major project.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
115	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Add: NEW (1) Recognize and protect the statewide interest over local interest; (2) Preserve the natural character of the shoreline; (3) Result in long term over short term benefit; (4) Protect the resources and ecology of the shoreline; (5) Increase public access to publicly owned areas of the shorelines; (6) Increase recreational opportunities for the public in the shoreline. This order of preference is unique to Shorelines of Statewide Significance. They do not apply to all the County’s shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
116	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Whose interests were represented in developing all of these “County-wide policies”? There is no mention of other water-dependent activities besides “shellfish beds”, and some statements include the unique terminology of “food production and delivery”. The legislation does not require inventing brand new categories but rather requires a greater emphasis of protection upon certain shorelines under the Shoreline Management Act.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
117	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	County-wide Policies: NEW Alterations of the natural condition of the shoreline of the state, in those limited instances when authorized, shall be given priority for single-family residences and their accessory structures, ports, shoreline recreational uses including but not limited to parks, marinas, piers, and other improvements facilitating public access to shorelines of the state, industrial and commercial development which are particularly dependent on their location on or use of the shorelines of the state and other development that will provide an opportunity for substantial numbers of people to enjoy the shorelines of the state.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
118	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	County-wide Policies: NEW e. NEW Actively support programs which recognize the stewardship role of the County’s thousands of shoreline residential owners and promote their voluntary management of their shorelines such as through incentives, education, and community activities. "statement (e) recognizes the role of thousands of fresh and salt water and wetland shoreline owners who are on their properties for the long-term and use them on a daily basis."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
119	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH3: We object to 3(a) as phrased. The requirement in (a) is not valid. While water-dependent uses are a priority/preferred use, the legislation does not require the public to “preserve” (which is even greater than “protect”) enough lands for “economic” use to whatever extent they “project” a demand. Instead, WAC 173-26-221 (5)(c)(ii)(G) states that in the County’s overall SMP planning and within all of its Aquatic Shoreline Environmental Designation, the County “should reserve shoreline space for shoreline preferred uses...” and also requires consideration of additional factors. 3.b These are brand-new criteria – why? What is “detrimentally alter” and why isn’t mitigation allowed? This applies to uses within aquatic as well as upland SEDs?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
120	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH3: NEW Actively support programs which recognize the stewardship role of shoreline residential owners and promote their voluntary management of their shorelines. "NEW 3.e Thousands of home owners are on their properties for the long-term. Their sound ecological practices can yield benefits."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
121	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH4: Edits Which projects? Not all “projects” are currently required to do the analysis of incremental and cumulative impacts???? Replace 3.b with 3.d Replace with the added wording of (d). The objective is long-term protection and there are many ways to protect over years. There are also additional “ecological resources” that are not mentioned. NEW Ensure the long-term protection of ecological resources of statewide importance, such as anadromous fish habitats, forage fish spawning and rearing areas, shellfish beds, bird nesting and migration areas, eelgrass, tideland sea life, and unique environments. <Replacement for (b)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
122	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH5: d Improve what the County already owns. 5.e Expand public access opportunities through partnerships. Restoration areas might meet this Policy, too, if they provide public access.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
123	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH12: #SH-12 This doesn’t read correctly? Why are we protecting toxins and pathogens? In many cases sediment is a contaminant. It holds carcinogens causing disease and fish contamination and phosphorus which feeds algae and weed growth. Nutrients can be good if managed, detrimental if not.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. The policy is intended to protect shoreliness processes FROM the listed items, not TO protect the listed items. Language clarification needed.	Future Discussion Item
124	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH14: Protection usually results in negative impact of one thing over another. “Managed” is a more functional word.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
125	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH16: Where is this requirement? Where is the documentation that a planting plan actually improves ecological function and where is consideration given for people to actually use the shoreline as stated above as a preferred use? Why prohibited? There are many non native plants and highbreds that perform equal functions to native plants.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
126	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH16: Surely home owners can use non-native plants in other areas of their parcels.	Yes. Prohibition only applies in the buffer and setback. Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
127	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH18:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Language edits.		
							This is an important clarification to include tidelands and aquaculture because shorelines are used from the waterward side as well as the upland side.		
							Expand the examples because recreational opportunities are greater than shellfish harvesting.		
128	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH19:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Where do you address hazardous waste drained over the shoreline from roads and storm water drains?		
129	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH22:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							The requirement is to plan for this use through the SEDs. The County is not required to ignore other Shoreline Mgmt. Act and SMP requirements and place economic development in first place.		
130	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Language edits.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Policy SH23:		
131	12-Jan-18	Shoreline Stakeholder Coalition, Unknown Individual	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Economic developments need to comply with all aspects of the SMP, just like everyone else. There are more requirements to be met than minimizing and mitigating.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Language edits.		
							Policy SH31:		
							Clarify that the primary review criteria are impacts on existing uses and shoreline ecological functions and processes.		
132	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Whoa! Are we talking “adaptive management” of the same species and operation as receiving the permit or “experimental aquaculture”?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Allowances currently exist for aquaculture to develop experimental practices.		
							Experimental projects must receive permits and be monitored.		
133	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH33:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							How do you define "Little"? Aquaculture should comply with the same requirements for other commercial and residential uses.		
134	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Same comment as above. Supplemental food, pesticides and antibiotics should not be used.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Policy SH34:		
135	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Why are non-native species limited to only "significant ecological impacts"? The requirement is zero establishment of new non-native species.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Policy SH44:		
136	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	As previously discussed, we recommend establishing a voluntary credit system for home owners that stays with the property. The owner would have to document what they have done and then the credits can be used to mitigate any future maintenance, repair or "development".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Policy SH45:		
137	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	There needs to be a separation between Urban, Rural and Marine. In addition, there needs to be provisions to allow for proper drainage of the watershed. Placing logs and brush in a stream may be good for some fish but can be very damaging to shorelines and personal property.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Policy SH53:		
138	12-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Is there a restoration plan for right of ways that drain directly into streams, lakes and marine environments?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
137	25-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	General Feedback / No Specific Section	Change Requested	<p>Declaring our residences and appurtenances conforming is authorized by the Washington State Legislature in RCW 90.58.620 and by the State Department of Ecology in WAC 173-27-080. We support the following wording which was approved by the State Department of Ecology for Kitsap County:</p> <p>“Lawfully constructed structures, including those approved through a variance, built before the effective date of this Program shall be considered conforming.....”</p> <p>We do NOT support the draft wording for Thurston County’s draft SMP which reads:</p> <p>“Legally established structures occurring as of the effective date of this Program, which do not meet the standards of this Program, shall be considered nonconforming to this Program, to include appurtenances as defined in 19.100.150.”</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Comment part of a larger discussion on the term to be used for legally for nonconforming structures.</p>	Pending / Item for Discussion
138	25-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	<p>We recommend that no deadline be set by the Thurston County SMP for reconstruction at the original site.</p> <p>The recommended wording would read as follows: Draft wording of Thurston County SMP Update with requested revision 19.400.100 Existing Development B. Existing Structures C. In the event that a legally existing structure is damaged or destroyed by fire, explosion or other casualty, it may be reconstructed to configurations existing immediately prior to the time the structure was damaged or destroyed, without requirement by percentage of value or structure damaged or destroyed and without a specific timeline to make application for the necessary permits. provided the application is made for the necessary permits within twenty-four months of the date the damage or destruction occurred, and the restoration is completed within two years of permit issuance or the conclusion of any appeal on the permit.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
139	31-Jan-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	<p>We request that the draft’s definition of Shorelines of Statewide Significance be corrected to the precise wording assigned in the state law.</p> <p>We also request that the format of the draft section’s “ County-wide Policies” be returned to those of the current SMP (i.e., 1990 version) and continued input and consideration be given to the policies.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
140	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Fee_dback	General Feedback / No Specific Section	Change Requested	<p>The Planning Commission stated that the SMP will be "written to meet the least restrictive possible shoreline regulation". THIS IS NOT THE CASE: the SMP has been written to be more restrictive than ecology requires.</p> <p>WE RECOMMEND: Reduce the buffer to 35 feet with a 15 feet setback to create a total 50 feet setback from the shoreline. Mason County is doing this.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Per PC Meeting 2018.10.18., the SMP Draft is exploring "Advanced Mitigation" where voluntary improvements to property can be credited to future mitigation measures.</p>	Future Discussion Item
141	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Fee_dback	General Feedback / No Specific Section	Change Requested	<p>WE RECOMMEND: "New development" be redefined to differntiate it from "Repair and Maintenance" and "Remodeling " or "Rebuilding" of existing residential structures.</p> <p>The current definition covers all of the above.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>SMP Draft provides clarity on distinct allowances when applicable.</p>	Future Discussion Item
142	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Fee_dback	General Feedback / No Specific Section	Change Requested	<p>On "no net loss" requirement...</p> <p>WE REQUEST THAT: incentives need clarifiication in subsequent sections of the SMP and explanation of whether they are voluntary or regulatory.</p> <p>WE REQUEST THAT: Voluntary improvements to ecological function of a property both past and present be credited toward future potential development mitigation.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Per PC Meeting 2018.10.18., the SMP Draft is exploring "Advanced Mitigation" where voluntary improvements to property can be credited to future mitigation measures.</p>	Future Discussion Item
143	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Fee_dback	General Feedback / No Specific Section	Change Requested	<p>Permits and their reviews should be site specific....</p> <p>WE OBJECT: to vague wording in the draft which allows for unrestricted bundling of shorelines or broad area designations to serve as an "activity" for permitting.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
144	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AB_Introduction_100	130 Governing Principles	Change Requested	THERE NEEDS TO BE CLARIFICATION of the principles underlying how cumulative loss will be assessed and "fairley allocating the burden of addressing such impacts among development opportunities".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
145	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	THE DRAFT ERRONEOUSLY includes all Puget Sound shorelands under "statewide significance" requirements. This is an error which must be corrected.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
146	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	The current draft declares existing legally constructed residences and appurtenances as nonconforming if constructed closer to the shoreline than the prescribed buffer/setback in the current draft. THESE RESIDENTS should be declared "legally conforming". Other jurisdiction have incorporated this concept successfully.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Comment part of a larger discussion on the term to be used for legally for nonconforming structures.	Future Discussion Item
147	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	The Draft has a 24 month timeline limit to apply for reconstruction... THIS TIMELINE SHOULD BE LENGTHENED	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Renewed investment for citizen and stakeholder input per recent PC meetings. As of 2018.10.10, PC facilitating restructure of schedule and community stakeholder involvement.	Future Discussion Item
148	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AF_General_Regulations_400	140 Bulk and Dimension Standards	Change Requested	Maximum hard surface area, table 19.400.140 is left blank and the reference to 19.400.125 has nothing to do with hard surfaces.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Table A 9.400.140 (A) has values. Referred	Future Discussion Item
149	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AF_General_Regulations_400	100 Existing Development	Policy Question	Definition of "Hard Surface" in the SMP includes a "vegetative roof". What is a vegetative roof? Will the addition of trees reduce the buildable surface area? If you cut down a tree can you increase your buildable surface area?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. "Vegetated roof" is not currently defined in the draft.	Future Discussion Item
150	4-Sep-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	The coalition concurs with the statements and requests made in a latter to Joshua Cummings dated July 27, 2018 from the Olympia Master Builders, re: proposed amendments to the Shoreline Master Program of Thurston County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
151	8-Oct-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Hi Brad, Will you be releasing any information regarding the current thinking on the Schedule and Timeline prior to the Planning Commission meeting on October 10th? We're still really in the dark out here. Thanks, John Woodford	Staff responded with information on timelines and Planning Commission processes. Forwarded to Planning Commission.	No Action Required
152	9-Aug-18	Gary Cooper	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	I am writing to inquire about whether you have any documents – a summary, table, or matrix of some kind – that shows what the proposed SMP development regulations would be compared to the existing SMP? Information comparing setbacks, lot sizes, etc. would be very useful to have for comparison. Thank you.	Forwarded to Planning Commission.	No Action Required
153	15-Nov-17	Maribeth Duffy	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Many of my neighbors have met with you to urge you to slow down the timeline on this process, and I join with them in voicing my concern for the rapidity of the timeline for such a very crucial update. Please genuinely inform the community of the process, welcome broad community representation at all levels of the review process, including STAG and other meeting venues, and listen to concerns raised. This investment of your time will build trust in the process.	Forwarded to Planning Commission.	No Action Required
154	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	A. “Shoreline” means all of the water areas of the state, associated shorelands, and the lands under-lying these areas except shorelines on streams with a mean annual flow of 20 cfs or less, and the wetlands associated with such upstream segments (RCW 90.58.030). The Act sets specific preferences for uses on shorelines. It calls for a higher level of effort in implementing shoreline objectives. Preferred uses for Shorelines of Statewide Significance, in order of priority, are listed in B. County-wide Policies.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
155	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	DELETE [Goal: To ensure that the statewide interest is recognized and protected over the local interest in shorelines of statewide significance, the County shall review all development proposals within shore-lines of statewide significance for consistency with RCW 90.58.020 and the following policies (in order of preference):]	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
156	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-1: Consult Tthe Washington Departments of Fish and Wildlife and Ecology, affected tribes, other resources agencies, and interest groups should be consulted for development proposals that could affect anadromous fisheries or species that are considered priority (federal or state-listed or vulnerable) by the WDFW PHS Program.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
157	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-2: Edits to a-c. Big deletion for parts of c.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
158	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-3: Edits to a-c. Biggest alteration to a.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
159	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-4: All?Projects [of a certain size or type] shall be required to consider incremental and cumulative impacts while ensuring no net loss of shoreline ecosystem processes and functions. Determine cumulative impacts by analyzing direct and indirect effects of impacts as early as possible to develop and refine the analysis and facilitate project design. b. Ensure the long-term protection of ecological functions and natural resources of statewide importance, by severely limiting activities impacting anadromous fish habitats, forage fish spawning and rearing areas, natural shellfish beds, eelgrass, bird nesting and migration areas (16 USC Chapter 7, Subchapter II), and other unique environments.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
160	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-5: Edits to a-c, complete rework of d: Partner with other entities to increase public access to publicly owned areas of shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
161	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-6: Edits to a-b, requested clarification on b. (well away? Uplands?)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
162	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	19.300.105: Edited goal. Added new policies: Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. Benefits of Ecological Protection include, but are not limited to, the following: 1. Establish and manage shoreline uses and development in a manner that mitigates adverse impacts so the resulting ecological condition is maintained or improved; 2. Prevent, avoid, or minimize adverse impacts by all shoreline uses and development on the shoreline environment;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
163	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	19.300.105: Edited goal. Added new policies: Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. Benefits of Ecological Protection include, but are not limited to, the following: 3. Recognize the value of adaptive management as a means of providing for flexibility in administering ecological protection provisions of the Master Program.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
164	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	19.300.105: Edited goal. Added new policies: Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. 4. Assure that shoreline modifications individually and cumulatively do not result in a net loss of ecological functions by: a. limiting the number and extent of shoreline modifications; b. giving preference to the types of shoreline modifications that have a lesser impact on ecological functions; and c. requiring mitigation of identified impacts resulting from shoreline modification.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
165	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	<p>19.300.105: Edited goal.</p> <p>Added new policies:</p> <p>Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. Benefits of Ecological Protection include, but are not limited to, the following:</p> <p>5. Plan for the enhancement of impaired ecological functions where feasible and appropriate while accommodating permitted uses and development. As shoreline modifications occur, incorporate all seasonal measures to protect ecological shoreline functions and ecosystem-wide processes.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
166	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	<p>19.300.105: Edited goal.</p> <p>Added new policies:</p> <p>Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. Benefits of Ecological Protection include, but are not limited to, the following:</p> <p>6. Preserve and protect existing trees and native vegetation within shorelines to maintain shoreline ecological functions and mitigate the direct, indirect, and cumulative impacts of shoreline development. Where shoreline vegetation is inadequate to protect against the impact of new uses or development, enhanced with native vegetation.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
167	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	<p>19.300.105: Edited goal.</p> <p>Added new policies:</p> <p>Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. Benefits of Ecological Protection include, but are not limited to, the following:</p> <p>7. Avoid impacts to shorelines through application of mitigation sequencing, giving highest priority to impact avoidance whenever new uses or development are proposed in shorelines.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
168	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	<p>19.300.105: Edited goal.</p> <p>Added new policies:</p> <p>Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC. The Ecological Protection policies shall apply to all uses and development, within all shoreline environment designations. Benefits of Ecological Protection include, but are not limited to, the following:</p> <p>8. Allow vegetation management through practices such as pruning, trimming, or limbing for purposes of views and access paths when it is demonstrated that these practices will result in no net loss of shoreline ecological functions and processes.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
169	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	<p>19.300.105: Edited goal.</p> <p>Added new policies:</p> <p>Policy SH-XX Assure no net loss of ecological functions and processes in shorelines, shoreline buffers, and protecting Critical Areas designated in Title [19.300._] TCC.</p> <p>9. Protect shoreline ecological functions in adjacent areas that provide primary and secondary ecological functions.</p> <p>E. Policy SH-XX Conduct and maintain baseline analyses of existing ecological functions for water-dependent and water-related development. Partner with tribes, agencies and universities to conduct regular monitoring to determine loss of shoreline ecological functions and account for cumulative and secondary impacts. (repeated from Shoreline Use section)</p> <p>Policy SH-XX Implement monitoring and feedback systems for adaptive management and create a central database for baseline survey data and the streamlining of guidance, to prevent significant impacts and improve accuracy and effectiveness.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
170	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	<p>Policy SH7:</p> <p>Heavily edited definitions:</p> <p>Definitions:</p> <p>Shoreline ecology Numerous ecological processes and functions -- large and small, fast and slow -- operate in an ecosystem. Processes are influenced by both human activity, such as shoreline armoring and septic systems, and natural events such as windstorms, floods, earthquakes, and landslides. Ten key landscape processes -- both marine and freshwater -- are important to the vitality of Pacific Northwest coastal watersheds. Ultimately, they help to assess the value of shorelines and direct the management of shorelines. For example: 1) Erosion of a beach or bluff affects how sediment and woody debris reach the shoreline; 2) sediment and woody debris influence shoreline structures such as sand spits and mud-bottomed lagoons); and 3) the structure in turn dictates how a shoreline functions as habitat for fish and wildlife spawning, rearing, migration, refuge, or as a protective (or risky) area for development.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
171	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH7: Heavily edited definitions: Definitions: Shoreline ecological functions include the following: Hydrological Cycle - how water moves can change everything; Large Woody Debris - trees, roots, and branches deposited on beaches and in and along streams and rivers; Light energy - light levels from shoreline vegetation or artificial lighting at night; Nitrogen - alteration in nitrogen levels change the ecosystem; Pathogens - germs and parasites which infect and weaken living things; Phosphorus - alteration in phosphorus levels change the ecosystem; Sediment - erosion, movement, and deposition of silt and sand; Tidal influences - engineered rivers, tide gates, culverts; Toxins - pollutants that weaken or kill animal and plant life;Wave energy - boat traffic, bulkheads, armoring, breakwaters, docks.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
172	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Added new policy: Policy SH-XX Implement a monitoring and feedback system for adaptive management and create a central database for baseline survey data and the streamlining of guidance, to prevent significant impacts and improve accuracy and effectiveness.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
173	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Minor language edits across Policy SH11, 12, 13, 14.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
174	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Added new policy: Policy SH-XX Classify and designate the following fish and wildlife habitat conservation areas. Include the best available science, as described in chapter 365-195 WAC. (WAC 365-190-130): (a)Areas where endangered, threatened, and sensitive species have a primary association; (b) Habitats and species of local importance, as determined locally; (c) Commercial and recreational shellfish areas; (d) Kelp and eelgrass beds; herring, smelt, and other forage fish spawning areas; (e) Naturally occurring ponds under twenty acres and their submerged aquatic beds that provide fish or wildlife habitat; (f) Waters of the state; (g) Lakes, ponds, streams, and rivers planted with game fish by a governmental or tribal entity; and (h) State natural area preserves, natural resource conservation areas, and state wildlife areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
175	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Added new policy: Policy SH-XX Counties and cities shall classify as critical areas all public and private tidelands or bedlands suitable for shellfish harvest. Counties and cities should consider: (i) both commercial and recreational shellfish areas; (ii) the Washington state department of health classification of commercial and recreational shellfish growing areas to determine the existing condition of these areas; (iii) the vulnerability of these areas to contamination; (iv) Shellfish protection districts established pursuant to chapter 90.72 RCW shall be included in the classification of critical shellfish areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
176	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Added new policy: Policy SH-XX Counties and cities shall engage in cooperative planning and coordination by considering (WAC 365-190-130): (i) Creating a system of fish and wildlife habitat with connections between larger habitat blocks and open spaces, integrating with open space corridor planning where appropriate; (ii) The level of human activity in such areas, including presence of roads and level of recreation type (passive or active recreation may be appropriate for certain areas and habitats); (iii) Protecting riparian ecosystems, including salmonid habitat, which also includes marine near-shore areas; (iv) Evaluating land uses surrounding ponds and fish and wildlife habitat conservation areas that may negatively impact these areas, or conversely, that may contribute positively to their function; (v) Establishing buffer zones around these areas to separate incompatible uses from habitat areas;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
177	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Added new policy: Policy SH-XX Counties and cities may consider the following (WAC 365-190-130): (i) Potential for restoring lost and impaired salmonid habitat; (ii) Potential for designating areas important for local and ecoregional biodiversity; and (iii) Establishing or enhancing nonregulatory approaches in addition to regulatory methods to protect fish and wildlife habitat conservation areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
178	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Edit Policy SH-15, add text: 4. Replace designated noxious weeds and invasive species with native vegetation and other non-invasive vegetation to establish and maintain shoreline ecological functions and processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
179	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Edit Policy SH-15, add text: 5. Remove noxious weeds in accordance with WAC 16-750-020. Where eelgrass beds are disputed as a critical saltwater habitat, appropriate state agencies and co-managing tribes shall be consulted in order to assist with the determination. All eelgrasses, native or otherwise, are protected by the Clean Water Act. Japanese eelgrass may have beneficial value; it has numerous positive non-invasive impacts on unmanaged tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
180	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	New policy: Policy SH-XX Retention of existing vegetation shall be a priority within the entire shoreline jurisdiction. Retention of existing trees is particularly important. Vegetation replanting is required for all development, uses or activities within the 200-foot shoreline jurisdiction that either alters existing native vegetation or any vegetation in the required Shoreline Buffer or Vegetation Management Areas, whether a permit is required or not. Invasive species removal is included. Minimum requirements for Planting Plans can be found in the County’s Administrative Vegetation Management Manual [or name location].	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
181	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Edits: A. Policy SH-18 Prevent or minimize shoreline use and development, including water-dependent use, should minimize impacts that contaminate surface or ground water, cause adverse effects on shoreline ecological functions, or impact aesthetic qualities and recreational opportunities, including healthy, shellfish suitable for human consumption, fishing, bird and wildlife viewing, swimming, boating, and all types of navigation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
182	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	NEW CONTENT: E. Policy SH-XX Prevent water pollution from all shoreline uses and development into waters of the state. Prohibit shoreline use or development that is likely to create a nuisance or render such waters harmful, detrimental or injurious to the public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate beneficial uses, or to livestock, wild animals, birds, fish or other aquatic life in accordance with RCW 90.48 (water pollution control). [ADD TO DEFINITIONS: Waters of the State: Waters that include lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and watercourses within the jurisdiction of the state of Washington (RCW 90.48.020).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
183	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	NEW CONTENT: Policy SH-XX Locate, construct, and operate development in a manner that maintains or enhances the quantity and quality of surface and ground water over the long term.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
184	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	NEW CONTENT: E. Policy SH-XX Prevent water pollution from all shoreline uses and development into waters of the state. Prohibit shoreline use or development that is likely to create a nuisance or render such waters harmful, detrimental or injurious to the public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate beneficial uses, or to livestock, wild animals, birds, fish or other aquatic life in accordance with RCW 90.48 (water pollution control).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
185	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	NEW CONTENT: ADD: Policy SH-XX Prevent impacts to water quality and stormwater quantity that would result in a net loss of shoreline ecological functions. Policy SH-XX Prevent contamination of surface and ground water and soils. Policy SH-XX Minimize the need for chemical fertilizers, pesticides, or other similar chemical treatments. Policy SH-XX Encourage the use of low impact development (LID) techniques. Policy SH-XX Minimize the use of impervious surfaces. Policy SH-XX Protect commercial shellfish areas and legally established aquaculture enterprises from damaging sources of pollution.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
186	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Commenter turned the goal into a policy, and the remaining economic development policies have been moved. Economic Development section deleted	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
187	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	125 Historic, Archeological, Cultural, Scientific and Educational Resources	Change Requested	New Policies: C. Policy SH-XX Ensure local governments establish a historic preservation program meeting federal and state standards and become certified. D. Policy SH-XX Locate, design, and operate developments to be compatible with the protection of any adjacent identified archaeological, cultural, or historic site.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
188	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	125 Historic, Archeological, Cultural, Scientific and Educational Resources	Change Requested	New Policies: E. Policy SH-XX Where appropriate, locate access trails near protected, educational, historical, and archaeological sites and areas. F. Policy SH-XX Encourage private and public owners of archaeological, cultural, or historic sites to provide public access and educational opportunities in a manner consistent with long-term protection of both historic values and shoreline ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
189	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Recommended definitions:</p> <p>Definitions: Low-impact development (LID) is a term describing a land planning, and engineering design approach, to manage stormwater runoff as part of green infrastructure. LID emphasizes conserva-tion and use of on-site natural features to protect water quality. Sustainability is the property of biological systems to remain diverse and productive indefinitely, so environmental functions and processes can endure. Long-lived and healthy wetlands and for-ests are examples of sustainable biological systems</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
190	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Minor edits to Policy SH27. Commenter notes: . It is important to remember that recreational use of aquatic waters has a high economic value and level of attraction to the people of Puget Sound.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
191	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New policy:</p> <p>Policy SH-XX Uses shall be preferred that are consistent with control of pollution and preven-tion of damage to the natural environment, or are unique to or dependent upon use of the state's shoreline.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
192	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New policy:</p> <p>Policy SH-XX Coordinated planning is necessary to protect the public interest associated with the shorelines of the state while, at the same time, recognizing and protecting private property rights, consistent with the public interest (RCW 90.58.020).</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
193	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Edit policy SH28:</p> <p>Designate and maintain appropriate areas, based on appropriate site planning and use of the most current, accurate, and complete scientific and technical information available, for protecting and restoring shoreline ecological functions and processes to control pollution and prevent damage to the shoreline environment and/or public health.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
194	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Minot edits to policy SH29	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
195	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New policy:</p> <p>Policy SH-XX Provide for the location and design of industries, transportation, port and tourist facilities, commerce and other developments that are particularly dependent upon a shoreline lo-cation and/or use, based on shoreline environments that determine when shoreline can be used to accommodate such development, where the goal of resource use is consistent with the definition and purpose of each shoreline environment designation, and the goal of no net loss of ecological function and processes.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
196	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Re: Policy SH23</p> <p>[The Washington Shellfish Initiative is a political initiative and is not law. It is inappropriate to include references to the WSI in the SMP.]</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
197	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Large edits to make aquaculture policies their own section (19.300.xxx) with a distinct goal.</p> <p>New policy: Policy SH-XX Local governments shall consider local ecological conditions and provide limits and conditions to assure appropriate compatible types of aquaculture for the local condi-tions as necessary to assure no net loss of ecological functions.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
198	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Edits to Policy SH-30:</p> <p>Policy SH-30 Aquaculture is of statewide interest. Properly managed, it can result in long-term, over short-term, benefit and can protect the resources and ecology of the shoreline. Aquaculture is dependent on the use of the water area and, when consistent with the prevention and control of pollution, and prevention of damage to the environ-ment, is a preferred use of the water area. Yet the public's opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state shall be preserved to the great-est extent feasible consistent with the overall best interest of the state and the people gen-erally. Preferred uses are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon the use of the state's shore-line (RCW 90.58.020).</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
199	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Edits to Policy SH-31:</p> <p>Policy SH-31 Include conditions for adaptive management and monitoring in experimental aquaculture projects since the technology associated with some forms of aquaculture is still experimental and in formative states. When implementing the regulations of this section to determine potential aquaculture locations, develop baseline information and projected use data that shows the potential impacts on existing uses and shoreline ecological functions and processes.</p> <p>Potential locations for aquaculture activities are relatively restricted by water quality, temperature, dissolved oxygen content, currents, adjacent land use, wind protection, commercial navigation, and salinity. Adjacent land use restricts locations through ?stormwater flow? (Give examples).</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
200	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New policy:</p> <p>Policy SH-XX Base the rationale for aquaculture decisions on inventory and characterization, scientific studies, and input from federal and state agencies with special expertise with respect to any environmental impact (RCW 90.58.100(1)(b)) as well as information from other interested parties. Use caution regarding studies and information from locations where the physical conditions, regulatory framework, and industry operations are different and the conclusions may not be relevant to Washington or a specific jurisdiction.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
201	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New policy:</p> <p>Policy SH-XX Conduct and maintain baseline analyses for aquaculture of existing ecological functions. Partner with tribes, agencies and universities to conduct regular monitoring and adaptive management to determine loss of shoreline ecological functions and account for cumulative and secondary impacts.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
202	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Language edits for Policies SH35,36,37	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
203	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New Policy:</p> <p>Policy SH-XX Locate and design floating, submerged and intertidal aquaculture structures and other similar structures to avoid significantly impacting navigation and other water-dependent uses. Approval of such structures may include the following conditions:</p> <p>(A) Clustering or spacing of rafts to allow for small boat traffic within or through the facilities;</p> <p>(B) Directional signage;</p> <p>(C) Buoys marking the extent of the operation;</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
204	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>New Policy:</p> <p>Policy SH-XX Locate and design floating, submerged and intertidal aquaculture structures and other similar structures to avoid significantly impacting navigation and other water-dependent uses. Approval of such structures may include the following conditions:</p> <p>(D) Limits on the type, number, location and size of the facility and any accessory structures; and</p> <p>(E) All floating and submerged aquaculture structures and facilities in navigable waters shall be marked in accordance with U.S. Coast Guard requirements.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
205	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	<p>Policy edits:</p> <p>Policy SH-39 Protect the public’s opportunity to enjoy the physical, and visual, and aesthetic qualities of the shoreline consistent with balancing shoreline use and development in such a way that minimizes interference with the public’s use or enjoyment of the water. The public's opportunity to enjoy these qualities of natural shorelines of the state shall be preserved to the greatest extent feasible consistent with the overall best interest of the state and the people (RCW 90.58.020). Public access</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
206	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	<p>New Policy:</p> <p>Policy SH-XX Establish access buffers around water-dependent uses to separate incompatible uses;</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
207	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	<p>New Policy:</p> <p>Policy SH-XX 1. Protect the navigation rights of the general public</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
208	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	<p>New Policy:</p> <p>Policy SH-XX 2. Provide the space necessary for water-dependent uses,</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
209	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 3.Protect, promote, and enhance the public's opportunity to enjoy the physical and aesthetic qualities of shorelines,	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
210	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 4.Increase the amount and diversity of shoreline access to the State's shorelines consistent with the natural shoreline character, property rights, public rights under the Public Trust Doctrine, and public safety,	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
211	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 5.Design shoreline access to give priority to public safety and minimize potential impacts to private property, individual privacy, and shoreline ecological functions and processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
212	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 6. Include shoreline access facilities in development by public entities unless such access is shown to be incompatible because of safety or security concerns, adverse im-pacts to the shoreline environment or where a more effective public access system can be achieved through alternate means. Focus public access at the most desirable locations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
213	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 7. Publicly financed or subsidized development should not restrict public access to the water's edge except where such access is determined to be infeasible because of in-compatible uses, safety, security, or harm to ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
214	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 8. Design the scale and character of shoreline access areas and facilities propor-tionate to the scale of the proposed development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
215	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 9. Preserve and protect access opportunities offered by public road-ends and oth-er public rights-of-way that abut the water's edge, existing shoreline public use areas, and other public areas that provide visual or physical access to the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
216	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 10. Discourage right-of-way for utility development that would impede shoreline access, trails, and recreation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
217	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 11. Give preference to new recreation uses that facilitate the public's ability to reach, touch, and enjoy the water's edge, to travel on the waters of the state, and to view the water and the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
218	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XX 12. Acquire access to publicly owned tidelands and shorelands where appropriate and encourage cooperation among the County, landowners, developers, other agencies and organizations to enhance and increase public access to shorelines as specific opportu-nities arise.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
219	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH_XX Floating, submerged and intertidal aquaculture structures and other similar structures shall be located and designed to avoid significantly impacting public use of and access to the water, including navigational access to waterfront property, pedestrian circulation along beaches, and navigation between such structures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
220	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XR Give preference to developments that facilitate the public's ability to reach, touch, and enjoy the water's edge, to travel on the waters of the State, and to view the water and the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
221	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: SH-XR Provide ample, varied, and balanced recreational experiences in appropriate shoreline locations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
222	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Design facilities to accommodate expected capacity and to prevent overuse.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
223	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Policy SH-XR Locate recreational developments so that use and intensity are consistent with the characteristics of the shoreline in which they are located.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
224	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Discourage recreational development that requires extensive structures, utilities, roads, or substantial modifications of topography or vegetation removal.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
225	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Incorporate public education regarding shoreline ecological functions and processes, the role of human actions on the environment, and the importance of public involvement in shoreline management.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
226	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Encourage linkage of shoreline parks, upland recreation opportunities and water-oriented opportunities.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
227	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	New Policy: Encourage the acquisition of public shoreline recreational lands through a variety of means including fee purchase, acquisition of easements, options, development rights, and implementation of the Conservation Futures Act.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
228	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: Policy SH-XX Shoreline restoration is a non-regulatory SMP component established to ensure that shoreline functions are maintained or improved despite potential incremental losses that may occur despite implementation of SMP regulations and mitigation actions. Note: this section does not address required mitigation sequencing related to specific development proposals; see Section 19.400.110(A) for mitigation standards.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
229	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: Policy SH-XX It is not the intent of the County to require restoration on private property or to commit privately owned land for restoration purposes without the willing and voluntary coopera-tion and participation of the affected landowner.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
230	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: The primary purpose of the plan is to plan for “overall improvements in shoreline ecological func-tion over time, when compared to the status upon adoption of the master program” (WAC 173-26-201(2)(f)). The plan represents a long-term vision for voluntary restoration that will be imple-mented over time, resulting in ongoing improvement to the functions and processes in the coun-ty’s shorelines. The plan will incorporate the following:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
231	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: Priority SH-XX Prioritize restoration actions identified in the Shoreline Restoration Plan or other restoration plans that address regional environmental needs.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
232	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: Priority SH-XX Encourage restoration actions that enhance aquatic and upland ecological func-tions, processes, and physical features (such as native vegetation) and that address the needs of regulated fish and wildlife species.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
233	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: Priority SH-XX Encourage and support cooperative restoration efforts between local, state, and federal public agencies, tribes, non-profit organizations, and landowners to improve shorelines with impaired ecological functions and/or processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
234	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	New Policy: Priority SH-XX Incorporate public education regarding shoreline ecological functions and pro-cesses, the role of human actions on the environment, and the importance of public involvement in shorelines management in restoration and enhancement plans.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
235	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Edits to policies SH48-49: Plan, locate, and design proposed transportation, parking facilities, and utility facilities where routes will have the least possible adverse effect on unique or frag-ile shoreline features, will not result in a net loss of shoreline ecological functions, or ad-versely impact existing or planned water-dependent uses. Unavoidable adverse impacts shall be mitigated. Where other options are available and feasible, do not build new roads, or road expansions, within shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
236	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	New Policy: Policy SH-XX Provide for present and future utility services and facilities that produce, convey, store, or process power, fuel, wastewater, communications, solid waste, and such while minimiz-ing conflicts with other permitted shoreline uses and development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
237	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	New Policy: Policy SH-XX Locate new public and private utilities inland from the land/water interface, pref-erably out of shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
238	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	New Policy: Policy SH-XX Consolidate utility facilities within existing rights-of-way wherever possible.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
239	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	New Policy: Policy SH-XX Allow non-water-oriented utility production and processing facilities, or parts of those facilities within shorelines, only when there is no other feasible option.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
240	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	New Policy: Policy SH-XX Prohibit new solid waste disposal facilities or transfer facilities in shoreline areas except water-dependent solid waste transfer facilities which may be allowed in port or industrial areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
241	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	New Policy: Policy SH-XX Coordinate utility right-of-way acquisition and construction with transportation and recreation planning and also with other local government agencies and utility providers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
242	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Edits to Policy SH54, expanded enumeration of environmental considerations	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
243	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Policy Question	Commenter seeks clarity on Policy SH57	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
244	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added numerous sections: 19.300.x Commercial, Civic, and Industrial Uses: 1.Encourage restoration of impaired shoreline ecological functions and processes as part of commercial, civic and industrial development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							2.Allow mixed use development, including non water-dependent uses, only when they include and support water-dependent uses, unless the site does not abut the water's edge.		
							3.Encourage multiple-use concepts such as including open space and recreation in commercial, civic and industrial development.		
245	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added numerous sections: 19.300.x Commercial, Civic, and Industrial Uses: 4.Maximize use of existing ports and other industrial areas prior to expansion or development of new industrial sites.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							5.Consider regional industrial needs in reviewing new proposals and allocating shorelines for industrial development. Such reviews or allocations should be coordinated with port districts, adjacent counties and cities, and the State		
246	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Flood Hazard Management Goal: Minimize public and private losses due to flood conditions in flood hazard areas. Policies: 1.Demonstrate avoidance of adverse impacts to shoreline uses, resources, and values, including shoreline geomorphic processes, water quality, fish and wildlife habitat, commercial aquaculture, scenic resources, and bank erosion. 2.Give preference to flood hazard reduction measures that consist of nonstructural measures such as setbacks, land use controls, wetland restoration, dike removal, impervious surface reduction, use relocation, vegetation retention, biotechnical measures, and stormwater management programs.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
247	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Flood Hazard Management Goal: Minimize public and private losses due to flood conditions in flood hazard areas. Policies: 3.Flood hazard reduction measures may include structural measures such as dikes, levees, revetments, floodwalls, channel realignment, and elevation of structures. 4.Limit development, flood control structures, and other shoreline modifications that may adversely impact property or public improvements, or result in a net loss of ecological functions associated with rivers and streams, by interfering with channel migration processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
248	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Flood Hazard Management Goal: Minimize public and private losses due to flood conditions in flood hazard areas. Policies: 5.Return river and stream corridors to more natural hydrological conditions, recognizing that sea-sonal flooding is an essential natural process. 6.Consider the removal or relocation of structures in flood hazard areas when evaluating alternate flood control measures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
249	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Flood Hazard Management Goal: Minimize public and private losses due to flood conditions in flood hazard areas. Policies: 7.Allow flood hazard management structures only when the following can be demonstrated: a. They are necessary to protect development; b. Nonstructural measures are not feasible; and c. Appropriate vegetation conservation actions are undertaken. 8.Give preference to placing new flood hazard reduction structures landward of wetlands and associated buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
250	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Forest Practices Goal: Provide guidance for Forest Practice activities on shorelines. Policies: 1. Allow only selective harvest methods of merchantable timber in accordance with RCW 90.58.150 on Shorelines of Statewide Significance. 2. Accomplish reforestation in shorelines as quickly as possible. Replanting should be done with native species common to the area. 3. Forest lands should be reserved for long term forest management and other uses compatible with the forestry use	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
251	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Mining Goal: Accommodate mining practices while achieving compatibility with other shoreline uses. Policies: 1. Locate, design, and manage mining operations so that other legally established uses and devel-opment are not subjected to unnecessary adverse impacts such as diminished water quality, flooding, and bank erosion. 2. Prevent or avoid adverse impacts to shoreline geomorphic processes, ecological functions, wa-ter quality, fish and wildlife habitat, scenic resources.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
252	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Mining Goal: Accommodate mining practices while achieving compatibility with other shoreline uses. Policies: 3. Require mining operations to accomplish the timely restoration of disturbed areas to a biologi-cally productive, semi-natural, or other useful condition through a reclamation process. 4. Provide adequate protection against sediment and silt production when mining operations re-move rock, sand, gravel, and minerals from shoreline areas. 5. Ensure that mining does not preclude public recreation of the public shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
253	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 1.Set structures back from required shoreline buffers to ensure compatibility between uses and protection of buffer areas from residential activities.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
254	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 2.Ensure compliance with allowable density of new residential development in applicable com-prehensive plan goals and policies, zoning restrictions, and shoreline environment designation standards.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
255	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 3.Prohibit the use of bonus density provisions, of the underlying zone classification, for lots cre-ated in shoreline environment designations containing sensitive ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
256	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 4.When on-site sewage systems are required for residential development, those systems and their associated drainfields should be installed outside of shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
257	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 5.Locate new development a sufficient distance from steep slopes or bluffs to ensure that stabili-zation measures are unlikely to be necessary during the life of the development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
258	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 6.Accessory uses should preserve open space, be visually and physically compatible with sur-rounding development, and be reasonable in size and purpose.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
259	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 7.Prohibit new over-water residences, including floating homes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
260	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 8.Encourage development that includes common open space and recreation facilities adjacent to the water's edge.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
261	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 9.Residential development should preserve existing vegetation, open space, habitat, and critical areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
262	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 10.Encourage the use of low impact development (LID) techniques.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
263	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Residential Uses Goal: Accommodate residential development and appurtenances. Policies: 11.New residential structures should be located with respect to views and should not exceed a height of 35 feet.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
264	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Water Access Facilities Goal: Manage development of facilities that support water-dependent uses such as mooring buoy, mooring piling, float, list, railway, launching ramp, dock (pier, ramp, and/or float), marina, and water access stairs. Policies: 1.Locate, design, and operate facilities so that other water-dependent and preferred uses are not adversely affected. 2.Discourage facilities that serve only one residence, and encourage facilities serving more than one residence.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
265	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Water Access Facilities Goal: Manage development of facilities that support water-dependent uses such as mooring buoy, mooring piling, float, list, railway, launching ramp, dock (pier, ramp, and/or float), marina, and water access stairs. Policies: 3.Discourage railways, docks and launching ramps on shallow, gradually-sloping beaches that result in excessively long facilities, or normal length facilities that are nonfunctional (e.g., high and dry) a majority of the time. 4.Size facilities in small water bodies, such as coves, bays, and inlets to accommodate maneuver-ability and existing legally established uses.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
266	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Water Access Facilities Goal: Manage development of facilities that support water-dependent uses such as mooring buoy, mooring piling, float, list, railway, launching ramp, dock (pier, ramp, and/or float), marina, and water access stairs. Policies: 5.Give preference to facilities: a. That provide public access and recreational opportunities; b. That are landward of the ordinary high water mark (OHWM) such as upland dry storage marinas; c. That are waterward of the OHWM that can be removed seasonally rather than permanent facilities; or d. That minimize the amount of shoreline modification (e.g., buoys rather than docks).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
267	4-Mar-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Commenter added sections: 19.300.x Water Access Facilities Goal: Manage development of facilities that support water-dependent uses such as mooring buoy, mooring piling, float, list, railway, launching ramp, dock (pier, ramp, and/or float), marina, and water access stairs. Policies: 6.Encourage the removal of un-utilized or derelict facilities. 7.Restrict liveaboards from extended mooring except when located at a marina. 8.Limit proposals located in a constricted body of water to ensure the site is not overrun with facilities, and has the flushing capacity necessary to maintain water quality.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
268	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Dear Thurston County CPED and Thurston County Planning Commission, Thank you for the opportunity to comment on the SMP 2017 Update. Please accept our comments on chapters 19.400 through 19.700 of the SMP 2017 Update. To ensure the SMP is environmentally protective and based on the best available science and prudent management, our comments are based on comments from environmental and other community stakeholders, other counties' updated SMPs, WDFW, WDNR, Ecology, SMA, GMA, CWA, and ESA, and additional state RCWs and WACs. Edits are based on the Plain Writing Act of 2010 for government agencies. Thank you, Anne Van Sweringen, Representative, Environmental Stakeholders Group	Forwarded to Planning Commission.	No Action Required
269	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Chapters: 19.400 Use and Development Regulations 19.500 Permit Provisions, Review and Enforcement (p.64) 19.600 Shoreline Uses and Modification Development Standards (p.79) 19.700 Special Reports (p. 130)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
270	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	DEFINITION: The term 'nonconforming' means that a use/structure was in compliance with all codes when it was established, but no longer meets code requirements because the codes have changed – like the term 'grandfathered.'. Non-conforming is not the same as illegal. Nonconformity is often due to location where buffer and setback requirements are not met. Many existing shoreline uses/structures that were legally established before the first Thurston County SMP (199174) have been non-conforming for decades with little consequence.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
271	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	DEFINITION: The term 'nonconforming' ... Most new repair and maintenance activities for these 'grandfathered' structures will be allowed through a streamlined administrative process for permit exemption approval. Also see the buffers and setbacks sections below. What if my house burns down? If a legal non-conforming structure is damaged by natural disaster, it may be rebuilt in the same location and to the same configuration, as long as certain criteria are met. For example, the rebuilt structure must not be expanded and permitting time limits must be met. The few exceptions are if rebuilding would damage the shoreline or adjacent property, or if the location is in/over water or geologically unsafe.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
272	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Policy Question	DEFINITION: The term 'nonconforming' means... Can I remodel my non-conforming home? The SMP usually doesn't apply to interior remodels, but add-ons, expansions and enlargements must comply with the Program. Existing homes that become non-conforming with the new SMP may be allowed to expand/enlarge the footprint inside the new buffer area if certain criteria are met – 1) minor expansion with only an administrative shoreline exemption approval; 2) moderate expansion with a conditional use permit; and 3) substantial expansion with a shoreline variance approval.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
273	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Policy Question	DEFINITION: The term ‘nonconforming’ means... A use or structure legally located within shorelines of the state that was established or vested, on or before the effective date of the local government’s development regulations, to protect critical areas may continue as a conforming use and may be redeveloped or modified if: (A) The redevelopment or modification is consistent with the local government’s master program; and (B) the local government determines that the proposed redevelopment or modification will result in no net loss of shoreline ecological functions. The local government may waive this requirement if the redevelopment or modification is consistent with the master program and the local government’s development regulations to protect critical areas (RCW 36.70A.480(3)(c)(i)).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
274	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Commenter Added Section: Commercial, Civic and Industrial Development and Uses The intent of the Commercial, Civic and Industrial policies and regulations is to manage commercial, civic, and industrial development on shorelines. . This Section applies to commercial, civic and industrial uses and development including centers that provide services and facilities for the transfer of commodities (water, air, or land) of commerce to and from vehicles, and may provide the means for their protection, storage, maintenance, and operation. Regulations on Industrial Development - Aquaculture - move aquaculture regulations (as use and development regs) to .400? Regulations. 1. Structures waterward of the OHWM shall be on located on piling or other open-work, and shall be limited to those that require over-water facilities. 2. In addition to standard submittal standards, see TCC – Appendix/section regarding Commercial, Civic, and Industrial Application Requirement.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
275	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Commenter Added Section: Commercial, Civic and Industrial Development and Uses The intent of the Commercial, Civic and Industrial policies and regulations is to manage commercial, civic, and industrial development on shorelines... Regulations. 3. Non water-oriented commercial uses, or portions of a use that are non-water oriented, are prohibited in shorelines unless they meet one of the following criteria: a. The use is part of a mixed-use project that includes water-dependent uses and provides a significant public benefit with respect to the Shoreline Management Act’s objectives such as providing public access and ecological restoration; and b. Navigability is severely limited at the proposed site; and the commercial, civic or industrial use provides a significant public benefit with respect to the Shoreline Management Act’s objectives such as providing public access and ecological restoration; or c. The use is physically separated from the water’s edge by another legally established property in separate ownership or existing permanent substantial improvement, such as a paved area, dike, levee, or other permanent structure which serves to eliminate or greatly reduce the impact of the proposed use and development upon the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
276	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Commenter Added Section: Commercial, Civic and Industrial Development and Uses 4. Non water-dependent commercial, civic and industrial uses should not be allowed over water except in existing structures or in the limited instances where they are auxiliary to and necessary in support of water-dependent uses. 5. Where applicable, new development shall include environmental cleanup and restoration of the shoreline in accordance with State and Federal laws. 6. A change from an existing non water-oriented commercial, civic or industrial use to another non water-oriented commercial, civic or industrial use is permitted without a Conditional Use Permit subject to the general policies and regulations of this Title.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
277	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Commenter Added Section: Commercial, Civic and Industrial Development and Uses 7. When commercial redevelopment involves relocating or expanding an existing structure, shoreline restoration or mitigation shall be a condition of approval. Restoration may include, but is not limited to: a. Moving the structure away from the shoreline; b. Removing any shoreline armoring or replacing hard with soft armoring; c. Restoring riparian vegetation, including removing invasive plants and planting native species; or d. Stormwater retrofits to implement Low Impact Development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
278	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Commenter Added Section: Commercial, Civic and Industrial Development and Uses 8. When commercial redevelopment involves relocating or expanding a structure, public access shall be a condition of approval, unless infeasible due to health or safety issues. Public access may include, but is not limited to: a. Establish shoreline access or maintain existing public access; b. Connecting a trail to existing public access on adjacent property; or c. Providing for visual access to the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
279	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Commenter change B.1.b. All legally established structures [and reasonable renovations and expansions] may continue and may be repaired or maintained in accordance with the Act, this Program, and Chapter 24.50 TCC.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Staff has incorporated updated renovation and expansion language as of 2018.10.17 Planning Commission, further collaboration with citizens scheduled per PC.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
280	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter changes to A. Location 1. New land or water development shall be located and designed to avoid or, if that is not possible, to minimize as much as possible, the need for modifications such as new and maintenance dredging, clearing, grading, or scraping. Any new development that would require modifications, which cause significant impacts to adjacent or down-current properties, shall not be allowed. 2. New development shall be located and designed to avoid the need for future shoreline stabilization using structures such as a dike, breakwater, pier, weir, dredged basin, fill, or bulkhead. Likewise, any new development which that would require shoreline stabilization, which causes significant impacts to adjacent or down-current properties, shall not be allowed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
281	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter changes to A. Location New aquaculture structures should be severely limited or prohibited, in accordance with Hearing Examiner Judge Bjorgen’s 2011 decision that the placement of tubes and netting structures on the beach in geoduck operations constitute construction of a structure and consequently a development. (43,000 per acre, totally approximately 7 miles and 16 tons of PVC may qualify as substantial- if total cost exceeds \$5,000 or interferes with normal public use of the water or shorelines of the state). [19.150.770 Substantial Development definition.]	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
282	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter changed A.6 All development shall occur as defined in 19.400.110(A) Mitigation Sequencing. . Where new developments and uses are proposed, shoreline vegetation shall be conserved or restored when feasible to maintain shoreline ecological functions and processes and mitigate the direct, indirect and cumulative impacts of shoreline development. Where retention of shoreline vegetation is not feasible, new developments shall include a vegetation management plan as defined in TCC 19.700 [location]. . Where a critical area or critical area buffer is present, the applicable requirements of Title __ TCC shall apply. . The Department shall periodically evaluate the cumulative effects of all project review actions in shoreline areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
283	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter Additions to 19.400.105 A Residential SED (Conservancy and Residential SEDs) The intent of Residential policies and regulations is to accommodate new and existing residential development and appurtenances. Single-family residences are a preferred use within the Urban and Rural Conservancy and Residential Shoreline Environment Designations (SEDs) when consistent with control of pollution and prevention of damage to the natural environment. The Residential policies and regulations encourage sustainable residential development through restrictions on the scale of development, preservation of vegetation and topography, and minimization of impacts to fish and wildlife habitat.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
284	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter Additions to 19.400.105 A Residential SED (Conservancy and Residential SEDs) Policies. 1. Set structures back from required shoreline buffers to ensure compatibility between uses and protection of buffer areas from residential activities. 2. Ensure compliance with allowable density of new residential development in applicable comprehensive plan goals and policies, zoning restrictions, and shoreline environment designation standards. 3. Prohibit the use of bonus density provisions, of the underlying zone classification, for lots created in shoreline environment designations containing sensitive ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
285	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter Additions to 19.400.105 A Residential SED (Conservancy and Residential SEDs) 4. When on-site sewage systems are required for residential development, those systems and their associated drainfields should be installed outside of shorelines. 5. Locate new development a sufficient distance from steep slopes or bluffs to ensure that stabilization measures are unlikely to be necessary during the life of the development. 6. Accessory uses should preserve open space, be visually and physically compatible with surrounding development, and be reasonable in size and purpose.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
286	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter Additions to 19.400.105 A Residential SED (Conservancy and Residential SEDs) 7. Prohibit new over-water residences, including floating homes. 8. Encourage development that includes common open space and recreation facilities adjacent to the water's edge. 9. Residential development should preserve existing vegetation, open space, habitat, and critical areas. 10. Encourage the use of low impact development (LID) techniques. 11. New residential structures should be located with respect to views and should not exceed a height of 35 feet.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
287	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – General. 1. Existing legally established residential structures and appurtenant structures located in a Shoreline Environment Designation (SED) which permits the residential development, but that do not meet standards for setbacks, buffers, yards, area, bulk, height, or density, shall be considered conforming for purposes of administering TCC__. See also TCC __, Recognition of Legally Established Development. 2. Table __, Standard Shoreline Buffers and Setbacks, indicates the required buffer for each SED. Table __, Fish and Wildlife Habitat Conservation Area Buffer Requirements, indicates the required fish and wildlife habitat area buffer or setback width for each shoreline water type. TCC__ includes the provisions by which fish and wildlife habitat area buffers and setbacks may be modified.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
288	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – General. 3. Residential development shall comply with bulk standards including setbacks, buffers, height, and density of TCC____. 4. New over-water residences and expansion of existing over-water residences, including floating homes, are prohibited. 5. Residential development on a lot shall comply with TCC__, Erosion Hazard Areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
289	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – General. 6. Residential structures shall not exceed a height of 35 feet pursuant to TCC___, Scenic Protection and Compatibility. 7. Not more than one third of the parcel within shoreline jurisdiction and landward of the ordinary high water mark shall be covered by impervious areas, except that new lots in a Natural or Conservancy SED shall be limited to 10 percent effective impervious surfaces, including parking areas but excluding a 12-foot wide driveway. This restriction applies to both principal and accessory uses and structures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
290	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – General. 8. New waterfront developments of two or more dwelling units within shoreline jurisdiction shall provide for joint use water access, unless determined during the review of the project that such joint use water access is infeasible due to topographic constraints. 9. Septic tanks and drain fields for new sewage disposal systems shall be located outside of shoreline setbacks and buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
291	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – Land Divisions and Boundary Changes. 1. Lots created through subdivision of land shall be situated so that development on the created lots will not require soft or hard shoreline stabilization methods. A geological analysis may be required to demonstrate that these methods will not be needed pursuant to TCC___. See also TCC___, Shoreline Stabilization policies and regulations. 2. Minimum lot width, measured at the ordinary high water mark (OHWM), shall be as follows for newly-created or adjusted lots, unless a greater dimension is required pursuant to TCC___ Development Regulations – Zoning: a. Natural SED = 100 feet, b. Conservancy SED = 75 feet, and c. Residential SED = 50 feet.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
292	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – Land Divisions and Boundary Changes. 3. Natural Shoreline Environment Designation (SED). a. New land divisions are prohibited from exceeding base density as determined by TCC___. b. The bonus density provisions of TCC___ shall not be allowed. c. New land divisions and subsequent development shall comply with Low Impact Development (LID) regulations of the Thurston County Stormwater Management and Site Development Manual, Volume VI, or as amended within shorelines. 4. New divisions of land, and subsequent development, that exceed the base densities as determined by TCC___ shall comply with LID regulations of the Thurston County Stormwater Management and Site Development Manual, Volume VI, within shorelines. 5. Residential developments containing five or more dwelling units shall provide and maintain a commonly owned tract between the water's edge and the first tier of lots closest to the water's edge for the benefit of all lots within said subdivision. The purpose of the tract is to maintain the natural visual appearance and ecological functions of the waterfront and to provide shoreline access.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
293	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Regulations – Land Divisions and Boundary Changes. 6. Critical areas and associated buffers, open space, access areas, shoreline recreational space, or other common area shall be protected in a tract, or alternative protective mechanism such as a protective easement, public, or private land trust dedication, or similarly protective mechanism prior to final approval of any division of land. Approval of an alternative protective mechanism will be subject to a determination by the Director or Hearing Examiner that such alternative mechanism provides the same level of permanent protection as designation of a tract. Each lot owner within the land division shall have an individual taxable interest in the tract(s) or protective mechanism, unless otherwise approved by the Director or Hearing Examiner. 7. New waterfront land divisions containing two or more dwelling units within shoreline jurisdiction shall provide for joint use water access, unless determined during the review of the project that such joint use water access is infeasible due to topographic constraints. Recorded documents for the land division shall note the provision for joint use water access if such access is required.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion on buffers especially of interest to citizen stakeholders, to be discussed at upcoming stakeholder workshops.	Development Regulations
294	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 1. Water-dependent in-water structures, activities, and uses are not subject to the shoreline buffers established in this Program, if the permittee submits a pollution prevention plan with their permit, or lease in accordance with 90.48.386. A permit or lease created or established for a water-dependent use in waters of the state located seaward of the OHWM which, in accordance with local and state requirements prior to the effective date of this Program or the Act, did not submit a pollution prevention plan associated with its permit or lease may be developed if such use submits such a plan in accordance with Water Pollution Control (RCW 90.48) and/or the Water Quality Standards for Surface Waters of WA State (WAC 173-201A).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
295	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 3. Projects involving in-water work for fish protection must comply with timing restrictions as set forth by state and federal project approvals, in accordance with the Hydraulic Code (WAC 220.660). . DEFINITION: In-water work: WDFW issues a permit called the Hydraulic Project Approval regarding work that changes the natural flow or bed, performed in or near waters of the state (WAC 220.660). . Water access facilities must comply with setbacks waterward of the OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
296	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 4. Protection of bank and vegetation. a. Alterations to the natural condition of the site, including significant removal of vegetation or rocks, thereby disturbingance of the bank and or bank vegetation, must be limited to that necessary to perform the in-water work, and involve regrading the natural slope and sediments. b. All disturbed areas alterations to the natural condition of the site shall must be restored and protected from erosion or siltation using vegetation or other means.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
297	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 5. If, at any time, water quality problems develop as a result of in-water work, immediate notification must be made to the any appropriate state or federal agency, e.g., Ecology, WDFW, WDNR , National Marine Fisheries Service, U.S. Fish and Wildlife Service, etc. Affected tribes shall also be notified. . Prohibit fill waterward of the ordinary high watermark (OHWM) except for restoration projects, or when necessary to support a water dependent use, public access, or alteration of a transportation facility of statewide significance.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
298	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 5. Filling...Filling waterward of the OHWM is prohibited for the purpose of creating upland. Unless overriding safety, structural, or environmental concerns exist, such filling may be allowed to support: a. Water-dependent uses; b. Public access; c. Cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan; d. Disposal of dredged material considered suitable under, and conducted in accordance with, the dredged material management program of the Washington State Department of Natural Resources (DNR); e. Expansion or alteration of transportation facilities of statewide significance currently located on the shoreline, and only upon a demonstration that alternatives to fill are not feasible;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
299	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 5. If, at any time, water quality problems develop as a result of in-water work, immediate notification must be made to the any appropriate state or federal agency, e.g., Ecology, WDFW, WDNR , National Marine Fisheries Service, U.S. Fish and Wildlife Service, etc. Affected tribes shall also be notified. Prohibit fill waterward of the ordinary high watermark (OHWM) except for restoration projects, or when necessary to support a water dependent use, public access, or alteration of a transportation facility of statewide significance... f. Mitigation action, environmental restoration, beach nourishment, or enhancement project; or g. Public utility projects approved in accordance with an adopted transportation or utility plan or program. . Activities waterward of the OHWM shall be allowed after the proponent has demonstrated that alternative locations and designs have been considered and found to be infeasible, and the dump site or destination and staging area for dredged material has been provided. . Stabilization structures shall not be located waterward of 1) the ordinary high water mark (OHWM), or 2) any existing shoreline stabilization structure, unless overriding safety, structural, or environmental concerns exist..	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
300	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Commenter edits to 19.400.100 B. Standards for Work Waterward of OHWM: 5. If, at any time, water quality problems develop as a result of in-water work, immediate notification must be made to the any appropriate state or federal agency, e.g., Ecology, WDFW, WDNR , National Marine Fisheries Service, U.S. Fish and Wildlife Service, etc. Affected tribes shall also be notified. Prohibit fill waterward of the ordinary high watermark (OHWM) except for restoration projects, or when necessary to support a water dependent use, public access, or alteration of a transportation facility of statewide significance... f. Mitigation action, environmental restoration, beach nourishment, or enhancement project; or g. -- . Replacement of stabilization structures placed intrinsically below the OHWM shall abut existing shoreline stabilization structures. Soft shoreline stabilization measures that provide restoration of shoreline ecological functions and processes may be permitted waterward of the OHWM. . Structures waterward of the OHWM shall be placed on piling or other open-work, and shall be limited to those that require over-water facilities. . Mining is prohibited waterward of the OHWM and within wetlands. . Structures waterward of the ordinary high water mark (OHWM) shall be floating or on piling or other open-work and shall be limited to those uses that require over-water facilities. . Over-water recreational structures that extend waterward from the water’s edge shall not exceed 15 percent of the fetch.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
301	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	DEFINITION: Fetch: the distance across a water body measured in a straight line from where a facility connects to the OHWM to the closest point on the opposite shore. (from Thurston Co) Fetch: the length of water over which a given wind has blown. the distance traveled by wind or waves across open water. . Preference is given to non-permanent water access facilities placed waterward of the OHWM that can be removed seasonally, or that minimize the amount of shoreline modification (e.g. buoys rather than docks). . Facilities in marine waters that are waterward of the OHWM shall consist of an open framework (e.g., pilings, grated surfaces, cable railings, floating facilities held in place with anchors) that prevents solid surfaces with no openings, to the maximum extent feasible. . Launching ramps and covered moorage that is not light penetrable are prohibited waterward of the OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
302	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	DEFINITION: Fetch: the distance across a water body measured in a straight line from where a facility connects to the OHWM to the closest point on the opposite shore. (from Thurston Co) . Water access stairs shall not be constructed waterward of the OHWM. Landings within the stairway shall be limited to the minimum size necessary to meet applicable building codes. . Covered moorage that is not light penetrable are prohibited waterward of the OHWM. . Non water-dependent accessory uses shall not be allowed waterward of the OHWM except in limited instances where they are necessary to support a water-dependent use. . Covered facilities waterward of the OHWM shall only be allowed where demonstrated to be necessary, such as covered	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
303	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	Excavation, Dredging, Filling, and Grading. This Section may contain more restrictive regulations that limit or effectively preclude a use or development that is authorized pursuant to another Section(s) and this Section shall control in the event of a conflict. A. Applicability. The policies and regulations of this Section shall apply to all development for proposals that include excavation, dredging, filling or grading, within all shoreline environment designations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
304	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Policies. 1. Prohibit fill waterward of the ordinary high watermark (OHWM) except for restoration projects, or when necessary to support a water dependent use, public access, or alteration of a transportation facility of statewide significance. 2. Locate and design new development to avoid the need for fill. When fill is deemed necessary, its use should be minimized and environmental impacts mitigated. Evaluate fill projects for: 3. Evaluate fill projects for: a. Total water surface reduction; b. Navigation restriction; c. Impediment to water flow, circulation, and currents; d. Reduction of water quality; e. Destruction of habitat and natural resources systems; and f. Creation of hazard to the public and adjacent properties.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
305	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Policies. 4. Locate and design new development to avoid or minimize the need for maintenance dredging. 5. Allow dredging only for water-dependent uses and only to the extent necessary to support those uses. 6. Allow dredging for the purpose of establishing, expanding, relocating, or reconfiguring navigation channels and basins to ensure safe and efficient accommodation of existing navigational uses. 7. Restrict maintenance dredging of established navigation channels and basins to the minimum necessary, and limit such dredging to the historic or a previously dredged location, depth, and width. 8. Encourage recycling of clean, drained, dredged material, for uses that benefit shoreline resources and agricultural, forest land, and landscaping uses. 9.Prohibit dredging waterward of the OHWM for the purpose of obtaining fill material.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
306	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	C. Regulations. These regulations are in addition to those in TCC____, Construction and Infrastructure Regulations – Site Development and Stormwater Drainage, Thurston County Stormwater Management and Site Development Manual . 1. The following activities are prohibited: a. Filling in locations that will cut off or isolate hydrologic features, except as allowed pursuant to 19.400.____, Flood Hazard Management; b. Solid waste landfills; c. Dredging for the purpose of obtaining fill material, except for projects associated with Model Toxics Control Act (MTCA) or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) habitat restoration, or any other significant restoration effort project approved by a Conditional Use Permit; and d. Disposal of dredged material within the Nisqually Reach Aquatic Reserve.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
307	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	C. Regulations. These regulations are in addition to those in TCC____, Construction and Infrastructure Regulations – Site Development and Stormwater Drainage, Thurston County Stormwater Management and Site Development Manual . 2. Filling waterward of the OHWM is prohibited for the purpose of creating upland, but may be allowed when necessary to support: a. Water-dependent uses; b. Public access; c. Cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan; d. Disposal of dredged material considered suitable under, and conducted in accordance with, the dredged material management program of the Washington State Department of Natural Resources (DNR); e. Expansion or alteration of transportation facilities of statewide significance currently located on the shoreline, and then only upon a demonstration that alternatives to fill are not feasible; f. Mitigation action, environmental restoration, beach nourishment, or enhancement project; or g. Public utility projects approved in accordance with an adopted transportation or utility plan or program.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
308	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	C. Regulations. These regulations are in addition to those in TCC____, Construction and Infrastructure Regulations – Site Development and Stormwater Drainage, Thurston County Stormwater Management and Site Development Manual . 3. Excavation, dredging, filling, and/or grading shall not occur without an authorized principal use or development. 4. Excavation, dredging, filling, and/or grading shall be limited to the minimum amount necessary for the specific use or development proposed. 5. Activities waterward of the OHWM shall only be allowed after the proponent has demonstrated that alternative locations and designs have been considered and found to be infeasible, and the dump site or destination and staging area for dredged material has been provided.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
309	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	105 Proposed Development	Change Requested	C. Regulations. These regulations are in addition to those in TCC____, Construction and Infrastructure Regulations – Site Development and Stormwater Drainage, Thurston County Stormwater Management and Site Development Manual . 6. Excavation, dredging, filling, and/or grading shall not unnecessarily impact natural processes such as water flow, circulation, currents, channel migration, erosion, sediment transport, and floodwater storage, and shall not cut off or isolate hydrologic features. 7. Dredging material, if suitable, should be utilized for beneficial shoreline resources. 8. Stabilization measures should be designed to blend physically and visually with existing topography. 9. New development shall be located and designed to avoid or minimize the need for maintenance dredging.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
310	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation (from Pierce Co) . Generally, mitigation means offsetting or countering adverse environmental effects that developing the land can have on saltwater, wetlands, rivers, streams, lakes, and other aquatic habitats. In-lieu Fee Mitigation and Mitigation Banking. An applicant may utilize In-lieu Fee (ILF) Mitigation or Mitigation Banking at such time as the County has developed such programs and the programs have been approved by the appropriate State and Federal agencies. Applicants proposing ILF or Mitigation Banking are still subject to the mitigation sequencing requirements of Table ____ (from Thurston Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
311	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation A. Mitigation Sequencing (Pierce Co) Wetlands, Critical Areas, Waters of the State, or other types of aquatic resource mitigation usually occur in a sequence of steps or actions, from higher to lower priority. Compensatory mitigation is one of the last steps in the mitigation sequence when impacts to functions cannot be avoided. Unavoidable impacts are offset by creating, restoring, enhancing, or preserving other wetlands. Use the resources below to apply mitigation sequencing and to select, design, and implement compensatory mitigation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
312	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation A. Mitigation Sequencing (Pierce Co) Permittee-responsible mitigation means an aquatic resource activity undertaken by the permittee (or an authorized agent or contractor) to provide compensatory mitigation, for which the permittee retains full responsibility. Activities include restoration (re-creation or rehabilitation (repairing functions to a degraded resource)), creation, enhancement (manipulation to heighten, intensify, or improve a specific aquatic resource function), and/or preservation ((https://www.epa.gov/cwa-404/compensatory-mitigation-mechanisms).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
313	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation A. Mitigation Sequencing (Pierce Co) All development shall occur as defined in Mitigation Sequencing, with avoidance of impacts as the highest priority. Lower priority measures shall be applied only when higher priority measures are determined to be infeasible or inapplicable. Mitigation sequencing consists of a series of consecutive steps beginning with avoidance and ending with monitoring and taking appropriate corrective measures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
314	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation Permitted uses and developments shall be designed and conducted in a manner that protects ecological functions, processes, and the current ecological condition, and prevents or mitigates adverse impacts. Mitigation measures shall be applied in the following sequence of steps, listed in order of priority: a. Avoid the impact altogether by not taking a certain action or parts of an action; b. Minimize impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts; c. Mitigation types (in order of priority): i. Rectify the impact by repairing, rehabilitating or restoring the affected environment;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
315	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation Potential impacts should be monitored during beach/site preparation: (Rose, L.A. 2015) a. Clearing and grading should not alter factors including the results of marine habitat alteration, changes in benthic habitat structure, beach community, or their associated their functions. b. The disturbance by the activity should not affect the beach community, structure, or function. c. Site preparation should not cause a “Net-Loss” of shoreline functions, values, or processes, as permitted under WAC 173-26-186(8). d. Once the framework of mitigation sequencing (i.e., : avoid, minimize, mitigate) is applied to the site, clearing and grading should not create a net loss of site functions and values.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
316	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation A.2. 2. Application by each new development of the mitigation sequence shall achieve no net loss of ecological functions and processes for each new development, and shall not result in required mitigation in excess of that necessary to assure that the development will result in no net loss of shoreline ecological functions. shall not have a significant adverse impact on other functions fostered by the policy of the Act or this Program. Application of this sequence shall not result in required mitigation in excess of that necessary to assure that the development will result in no net loss of shoreline ecological functions. and not have a significant adverse impact on other functions fostered by the policy of the Act or this Program.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
317	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Commenter Alterations to Mitigation Options B.2 Other information, such as Ecology Wetland Inventory Maps, National Wetland Inventory Maps, county soil surveys, and aerial photos provide indications of where wetlands may exist. However, these might not include all wetlands and might identify areas that were once, but are no longer wetlands: a. Use online mapping tools to get an initial idea of potential wetlands on the property: i. 2011 Wetland Inventory Map for Western Washington: Medium resolution scale map developed by NOAA and Ecology, modeled from NOAA's Coastal Change Analysis Program. ii. U.S. Fish and Wildlife Service National Wetland Inventory iii. Coastal Atlas: Make a custom map (choose from more than 100 layers) b. Hire a qualified wetland professional c. Establish the existence (location) and physical limits (size) of the wetlands by conducting a wetland delineation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
318	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter Additions to Critical Areas A The purpose of this chapter is to identify regulated fish and wildlife species and habitats and establish habitat protection procedures and mitigation measures designed to achieve no net loss of species, habitat, or shoreline ecological function due to new development or regulated development, uses or activities. (from Thurston Co) . Local master programs, when addressing critical areas, shall implement the following principles (WAC 173-26-221): (i) Shoreline master programs shall adhere to the standards established in the following sections, unless it is demonstrated through scientific and technical information as provided in RCW 90.58.100(1) and as described in WAC 173-26-201 (2)(a) that an alternative approach provides better resource protection. (ii) In addressing issues related to critical areas, use scientific and technical information, as described in WAC 173-26-201	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
319	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Additions to Critical Areas A</p> <p>The purpose of this chapter is to identify regulated fish and wildlife species and habitats and establish habitat protection procedures and mitigation measures designed to achieve no net loss of species, habitat, or shoreline ecological function due to new development or regulated development, uses or activities. (from Thurston Co) (2)(a). The role of ecology in reviewing master program provisions for critical areas in shorelines of the state will be based on the Shoreline Management Act and these guidelines.</p> <p>(iii) In protecting and restoring critical areas within shoreline jurisdiction, integrate the full spectrum of planning and regulatory measures, including the comprehensive plan, interlocal watershed plans, local development regulations, and state, tribal, and federal programs.</p> <p>(iv) The planning objectives of shoreline management provisions for critical areas shall be the protection of existing ecological functions and ecosystem-wide processes and restoration of degraded ecological functions and ecosystem-wide processes. The regulatory provisions for critical areas shall protect existing ecological functions and ecosystem-wide processes.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
320	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Additions to Critical Areas A</p> <p>(v) Promote human uses and values that are compatible with the other objectives of this section, such as public access and aesthetic values, provided that impacts to ecological functions are first avoided, and any unavoidable impacts are mitigated.</p> <p>. In instances when the regulations of Title 24 TCC conflict with the requirements of 19.140, the more protective standard shall apply.</p> <p>. Because of its incorporation by reference, the provisions of Title 24 TCC shall apply to any use, alteration, or development within shoreline jurisdiction, to include those instances when it is determined that a shoreline permit or approval is not required.</p> <p>. The Reasonable Use provisions of Title 24 TCC are not included as part of the Shoreline Master Program.</p> <p>. Any modification to a critical area buffer that exceeds 25 percent shall be subject to review of a Shoreline Variance. In addition to critical areas defined under chapter 36.70A RCW and critical saltwater and freshwater habitats as described in these guidelines, local governments should identify additional shoreline areas that warrant special protection necessary to achieve no net loss of ecological functions (WAC 173-26-221).</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
321	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Additions to Critical Areas A</p> <p>(v) Promote human uses and values that are compatible with the other objectives of this section, such as public access and aesthetic values, provided that impacts to ecological functions are first avoided, and any unavoidable impacts are mitigated.</p> <p>. A use or structure legally located within shorelines of the state that was established or vested, on or before the effective date of the local government's development regulations, to protect critical areas may continue as a conforming use and may be redeveloped or modified if: (A) The redevelopment or modification is consistent with the local government's master program; and (B) the local government determines that the proposed redevelopment or modification will result in no net loss of shoreline ecological functions. The local government may waive this requirement if the redevelopment or modification is consistent with the master program and the local government's development regulations to protect critical areas (RCW 36.70A.480 (3)(c)(i)).</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
322	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>A. Unless the requirements of this TCC__ are met, Thurston County shall not grant any approval or permission to alter the condition of any land, water, or vegetation, or to construct or alter any structure or improvement regulated through the following: building permit, commercial or residential; binding site plan; franchise right-of-way construction permit; site development permit; right-of-way permit; shoreline permits; short subdivision; large lots; use permits; subdivision; utility permits; or any subsequently adopted permit or required approval not expressly exempted by this chapter.</p> <p>B. The following activities are regulated within critical fish and wildlife habitat areas, wetlands, aquifer recharge areas, landslide hazard areas, erosion hazard areas, flood hazard areas, and/or their buffers unless exempted by Section ____:</p> <p>1. Removing, excavating, disturbing, or dredging soil, sand, gravel, minerals, organic matter, or materials of any kind;</p> <p>2. Dumping, discharging, or filling;</p> <p>3. Draining, flooding, or disturbing the water level or water table. In addition, an activity which involves intentional draining, flooding, or disturbing the water level or water table in a wetland or stream in which the activity itself occurs outside the regulated area may be considered a regulated activity;</p> <p>4. Driving piling or placing obstructions, including placement of utilities;</p> <p>5. Constructing, reconstructing, demolishing, or altering the size of any structure or infrastructure;</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
323	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>A. Unless the requirements of this TCC__ are met, Thurston County shall not grant any approval or permission to alter the condition of any land, water, or vegetation, or to construct or alter any structure or improvement regulated through the following: building permit, commercial or residential; binding site plan; franchise right-of-way construction permit; site development permit; right-of-way permit; shoreline permits; short subdivision; large lots; use permits; subdivision; utility permits; or any subsequently adopted permit or required approval not expressly exempted by this chapter.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
324	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>B. The following activities are regulated within critical fish and wildlife habitat areas, wetlands, aquifer recharge areas, landslide hazard areas, erosion hazard areas, flood hazard areas, and/or their buffers unless exempted by Section ____:</p> <p>6. Altering the character of a regulated area by destroying or altering vegetation through clearing, harvesting, cutting, intentional burning, shading, or planting;</p> <p>7. Activities that result in significant changes in water temperature or physical or chemical characteristics of wetland or stream water sources, including changes in quantity of water and pollutant level;</p> <p>8. Application of pesticides, fertilizers, and/or other chemicals unless demonstrated not to be harmful to the regulated area.</p> <p>9. The division or redivision of land pursuant to TCC__ and boundary line adjustments.</p> <p>10. The creation of impervious surfaces.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
325	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>B.10.</p> <p>a. The Department shall conduct an initial review of an application in accordance with the provisions outlined in TCC Critical Areas, Development Regulations – General Provisions. The Department shall perform a critical area review for any application submitted for a regulated activity, Reviews for multiple critical areas shall occur concurrently.</p> <p>b. As part of the review of all development or building-related approvals or permit applications, the Department shall review the information submitted by the applicant to:</p> <p>(1) Determine whether the development proposal is consistent with TCC 19.400.115;</p> <p>(2) Determine if the mitigation and monitoring plans proposed by the applicant are sufficient to protect the public health, safety, and welfare consistent with the goals, purposes, objectives, and requirements of this section.</p> <p>c. When it is determined that regulated activities subject to SEPA (TCC__) are likely to cause a significant, adverse environmental impact to the critical areas identified in this section that cannot be adequately mitigated through compliance with this Title , mitigation measures may be imposed consistent with the procedures established in TCC__.</p> <p>d. Critical area applications required under this Title shall be approved prior to approval of any related action (parent application) such as, but not limited to, a building permit, land division action, site development action, forest practice application, TCC permit, use permit, or shoreline permit.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
326	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>Review Waiver. The requirement to submit critical area assessments, reports, etc. required under this Title may be waived at the Department’s discretion in the following circumstances:</p> <p>a. when the proposed project area for a regulated activity is located in an area that has been the subject of a previously submitted and approved assessment, report etc. if all of the following conditions have been met:</p> <p>(1) The provisions of this section have been previously addressed as part of another approval.</p> <p>(2) There has been no material change in the potential impact to the critical area or required buffer since the prior review.</p> <p>(3) There is no new information available that is applicable to any critical review of the site or particular critical area.</p> <p>(4) The permit or approval has not expired or, if there is no expiration date, no more than five years have elapsed since the issuance of that permit or approval.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
327	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>Review Waiver. The requirement to submit critical area assessments, reports, etc. required under this Title may be waived at the Department’s discretion in the following circumstances:</p> <p>b. Undeveloped Lots. For construction of a single family residence or associated features within an undeveloped lot, when the following conditions have been met:</p> <p>(1) The boundary of the critical area can be accurately determined without the need for a field review, using secondary data sources such as, but not limited to: aerial photographs, topographic maps, floodplain maps;</p> <p>(2) The critical area buffer requirement can be established without field review;</p> <p>(3) All aspects of the project are located outside of the required buffer, unless otherwise allowed pursuant to TCC (this section), Minor Expansion and Construction or TCC (this section), Exemptions;</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
328	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>Review Waiver. The requirement to submit critical area assessments, reports, etc. required under this Title may be waived at the Department’s discretion in the following circumstances:</p> <p>(4) The buffer is vegetated consistent with TCC (this section), Buffer Functioning Conditions; and</p> <p>(5) Compliance with the buffer requirement is adequate to protect the regulated species or habitat area from any impacts of the proposed activity. This exemption may not apply where additional protective measures, such as timing restrictions, are required.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
329	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter Alterations to Critical Areas A.</p> <p>Regulated Uses and Activities.</p> <p>Review Waiver. The requirement to submit critical area assessments, reports, etc. required under this Title may be waived at the Department’s discretion in the following circumstances:</p> <p>c. Developed Lots. For minor expansion that exceeds the TCC (this section) exemption, and for construction of accessory structures, within a developed lot, when the following conditions have been met:</p> <p>(1) The proposed development is not located on a transitory feature such as a sandbar, spit, or sand point.</p> <p>(2) Total disturbance within the buffer as a result of minor expansion, new construction, or any combination thereof, shall not exceed the lesser of 1,000 square feet or 25% of the existing structure footprint (where applicable) and shall not result in more than 1/3 impervious surface cover within any portion of the parcel that may be located within shoreline jurisdiction.</p> <p>(3) Total disturbance within 50-feet of any ordinary high water mark as a result of minor expansion, new construction, or any combination thereof, is limited to the lesser of 500 square feet or 25% of the area encompassed within the 50-foot area.</p> <p>(4) No trees are removed.</p> <p>(5) An Abbreviated Planting Plan shall be submitted as part of the parent application. The Plan shall meet the requirements of TCC (this section) Appendix A.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
330	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>Change name to Flood Hazard Management</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
331	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>(from Pierce Co)</p> <p>The channel migration zone should be established to identify those areas with a high probability of being subject to channel movement based on the historic record, geologic character and evidence of past migration (WAC 173.26.221)</p> <p>Unless otherwise demonstrated through scientific and technical information, the following characteristics should be considered when establishing the extent of the CMZ for management purposes (WAC 173.26.221):</p> <p>a. Within incorporated municipalities and urban growth areas, areas separated from the active river channel by legally existing artificial channel constraints that limit channel movement should not be considered within the channel migration zone.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
332	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>(from Pierce Co)</p> <p>The channel migration zone should be established to identify those areas with a high probability of being subject to channel movement based on the historic record, geologic character and evidence of past migration (WAC 173.26.221)</p> <p>Unless otherwise demonstrated through scientific and technical information, the following characteristics should be considered when establishing the extent of the CMZ for management purposes (WAC 173.26.221):</p> <p>b. All areas separated from the active channel by a legally existing artificial structure(s) that is likely to restrain channel migration, including transportation facilities, built above or constructed to remain intact through the one hundred-year flood, should not be considered to be in the channel migration zone.</p> <p>c. In areas outside incorporated municipalities and urban growth areas, channel constraints and flood control structures built below the one hundred-year flood elevation do not necessarily restrict channel migration and should not be considered to limit the channel migration zone unless demonstrated otherwise using scientific and technical information.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
333	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>(from Pierce Co)</p> <p>Master programs shall implement the following principles (WAC 173.26.221):</p> <p>(i) Where feasible, give preference to nonstructural flood hazard reduction measures over structural measures.</p> <p>(ii) Base shoreline master program flood hazard reduction provisions on applicable watershed management plans, comprehensive flood hazard management plans, and other comprehensive planning efforts, provided those measures are consistent with the Shoreline Management Act and this chapter.</p> <p>(iii) Consider integrating master program flood hazard reduction provisions with other regulations and programs, including (if applicable):</p> <ul style="list-style-type: none">• Stormwater management plans;• Flood plain regulations, as provided for in chapter 86.16 RCW;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
334	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>(from Pierce Co)</p> <p>Master programs shall implement the following principles (WAC 173.26.221):</p> <ul style="list-style-type: none">• Critical area ordinances and comprehensive plans, as provided in chapter 36.70A RCW; and• The National Flood Insurance Program.• (iv) Assure that flood hazard protection measures do not result in a net loss of ecological functions associated with the rivers and streams.• (v) Plan for and facilitate returning river and stream corridors to more natural hydrological conditions. Recognize that seasonal flooding is an essential natural process.(vi) When evaluating alternate flood control measures, consider the removal or relocation of structures in flood-prone areas.(vii) Local governments are encouraged to plan for and facilitate removal of artificial restrictions to natural channel migration, restoration of off channel hydrological connections and return river processes to a more natural state where feasible and appropriate.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
335	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>Structurally raising the floor elevation of an existing legally established single- family residence, to protect the structure from flooding due to sea level rise, shall be allowed in accordance with the height limits set forth in 19.400. (from Thurston Co)</p> <p>Proposals for flood hazard management measures shall demonstrate, by engineering and scientific evaluation, the following:</p> <ul style="list-style-type: none">a. Measures are necessary to protect health, safety, or existing legally established development;b. Measures are consistent with an adopted flood hazard management plan that evaluates cumulative impacts to the watershed system; andc. Benefits of the flood hazard project outweigh the anticipated environmental impacts.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
336	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <p>Removal of gravel for flood management purposes shall be consistent with an adopted flood hazard reduction plan, and shall be allowed only after a biological study and geomorphologic study show that extraction: 1) has a benefit to flood hazard management, 2) does not result in a net loss of ecological functions, and 3) is part of a comprehensive flood management solution. (from Thurston Co)</p> <p>Removing material from rivers and streams for the sole purpose of flood control may be permitted under the following conditions: (from Thurston Co)</p> <ul style="list-style-type: none">a. The location and quantities of sand and gravel or other materials to be removed are specified;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
337	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <ul style="list-style-type: none">b. Extraction amounts, rates, timing and locations are based on a scientifically determined sediment budget adjusted periodically according to data provided by a regular monitoring plan;c. The development will not adversely affect the natural processes of gravel transportation for the river or stream system as a whole. Specific studies prepared by a hydrogeologist and included with the application shall demonstrate that any adverse flood, erosion, or other environmental impacts occurring either upstream or downstream of extraction sites are mitigated; andd. The development shall be limited to work that occurs out of the water unless the project is adopted by a governmental agency or approved comprehensive flood hazard management plan.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
338	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation B. Frequently Flooded Areas</p> <ul style="list-style-type: none">. Accessory aggregate processing (crushing, washing, screening, stockpiling, and staging areas) may occur on site on a temporary basis after review of potential impacts.. Riprapping and other bank stabilization measures shall be located, designed and constructed to protect the natural character of the waterway.. Levees, revetments, berms and similar flood control structures shall be shaped and planted with vegetation suitable for wildlife habitat when feasible. (from Thurston Co). Regulated Channel Migration Zones (CMZ) are identified in TCC___. For regulated CMZs that have not yet had a study adopted by Thurston County, the default CMZ shall be the regulated FEMA floodway area. For more information regarding Channel Migration Zones, please refer to TCC___, Flood Hazard Areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
339	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation c. Critical Freshwater Habitats</p> <p>(from Pierce Co)</p> <p>Master programs shall implement the following standards within shoreline jurisdiction:</p> <ul style="list-style-type: none">(I) Provide for the protection of ecological functions associated with critical freshwater habitat as necessary to assure no net loss of ecological functions.(II) Integrate protection of critical freshwater, riparian and associated upland habitat, protection with flood hazard reduction and other lake, wetland, river and stream management provisions.(III) Include provisions that facilitate authorization of appropriate restoration projects.(IV) Provide for the implementation of the principles of ecological functions identified in WAC 173-26-221(c)(iv)(B).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
340	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation c. Critical Freshwater Habitats 1.c. Effective management of lake basins and river and stream corridors depends on: (I) Planning for protection, and restoration where appropriate, throughout the lake basin and along the entire length of the corridor from river headwaters to the mouth; and (II) Regulating uses and development within lake basins and stream channels, associated channel migration zones, wetlands, and the flood plains, to the extent such areas are in the shoreline jurisdictional area, as necessary to assure no net loss of ecological functions, including the associated hyporheic zone, results from new development (WAC 173-26-221). DEFINITION: Hyporheic zone: In a stream, the zone with tiny saturated interstitial areas beneath the stream bed and into the banks, that contain channel and ground water. This zone provides spawning habitat for certain species such as salmon.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
341	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation c. Critical Freshwater Habitats 3. Local governments should integrate master program provisions, including shoreline stabilization, fill, vegetation conservation, water quality, and flood hazard reduction, with specific uses to protect human health and safety, and to protect and restore lake and river corridor ecological functions and ecosystem-wide processes, as part of a comprehensive approach to management of critical and other freshwater habitats (WAC 173-26-221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
342	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation c. Critical Freshwater Habitats 3. Master program provisions for lake basins and river and stream corridors should, where appropriate, be based on the information from comprehensive watershed management planning where available (WAC 173-26-221). Master programs shall contain provisions to protect hydrologic connections between water bodies, water courses, and associated wetlands. Restoration planning should include incentives and other means to restore water connections that have been impeded by previous development (WAC 173-26-221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
343	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats Add: Critical saltwater habitats include all kelp beds, eelgrass beds, spawning and holding areas for forage fish, such as herring, smelt and sandlance; subsistence, commercial and recreational shellfish beds; mudflats, intertidal habitats with vascular plants, and areas with which priority species have a primary association (WAC 173.26.221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
344	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Critical saltwater habitats require a higher level of protection due to the important ecological functions they provide. Ecological functions of marine shorelands can affect the viability of critical saltwater habitats. Therefore, effective protection and restoration of critical saltwater habitats should integrate management of shorelands as well as submerged areas (WAC 173.26.221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
345	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Identify methods for monitoring conditions and adapting management practices to new information in comprehensive saltwater habitat management planning.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
346	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Reserve shoreline areas for protecting and restoring ecological functions prior to reserving shoreline areas for uses described in WAC 173-26-201 (2)(d)(i) through (v) (WAC 173.26.221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
347	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Local governments should base management planning on information provided by state resource agencies and affected Indian tribes unless they demonstrate that they possess more accurate and reliable information (WAC 173.26.221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
348	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Local governments should review relevant comprehensive management plan policies and development regulations for shorelands and adjacent lands to achieve consistency as directed in RCW 90.58.340. Local governments should base management planning on information provided by state resource agencies and affected Indian tribes unless they demonstrate that they possess more accurate and reliable information (WAC 173.26.221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
349	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Local governments, in conjunction with state resource agencies and affected Indian tribes, should classify critical saltwater habitats and protect and restore seasonal ranges and habitat elements with which federal-listed and state-listed endangered, threatened, and priority species have a primary association and which, if altered, may reduce the likelihood that a species will maintain its population and reproduce over the long term (WAC 173.26.221). Local governments, in conjunction with state resource agencies and affected Indian tribes, should determine which habitats and species are of local importance.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
350	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. Local governments shall protect kelp and eelgrass beds, forage fish spawning and holding areas, and priority species habitat identified by the department of natural resources' aquatic resources division, the department of fish and wildlife, the department, and affected Indian tribes as critical saltwater habitats. For regulations specific to submerged aquatic vegetation, forage fish spawning and herring holding areas and other in-water critical saltwater habitats, see __Title 24 TCC. (from Thurston Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
351	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1.d. The project is consistent with the State's interest [laws and regulations regarding] in resource protection and species recovery.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
352	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. after d. . Include an evaluation of current data and trends regarding the following in management planning for Critical Saltwater Habitats, in accordance with WAC 173.26.221: • Available inventory and collection of necessary data regarding physical characteristics of the habitat, including upland conditions, and any information on species population trends; • Terrestrial and aquatic vegetation; • The level of human activity in such areas, including the presence of roads and level of recreational types (passive or active recreation may be appropriate for certain areas and habitats); • Restoration potential; • Tributaries and small streams flowing into marine waters; • Dock and bulkhead construction, including an inventory of bulkheads serving no protective purpose; • Conditions and ecological functions in the near-shore area; • Uses surrounding the critical saltwater habitat areas that may negatively impact those areas, including permanent or occasional upland, beach, or over-water uses; and • An analysis of data gaps that exist and a strategy for gaining this information.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
353	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. after d. The management planning should address the following, where applicable: • Protecting a system of fish and wildlife habitats with connections between larger habitat blocks and open spaces and restoring such habitats and connections where they are degraded; • Protecting existing and restoring degraded riparian and estuarine ecosystems, especially salt marsh habitats; • Establishing adequate buffer zones around these areas to separate incompatible uses from the habitat areas; • Protecting existing and restoring degraded near-shore habitat;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
354	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.1. after d. The management planning should address the following, where applicable: • Protecting existing and restoring degraded or lost salmonid, shorebird, waterfowl, or marine mammal habitat; • Protecting existing and restoring degraded upland ecological functions important to critical saltwater habitats, including riparian and associated upland native plant communities; • Improving water quality; • Protecting existing and restoring degraded sediment inflow and transport regimens; and • Correcting activities that cause excessive sediment input where human activity has led to mass wasting.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
355	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.2. along with appropriate field verification including environmental baseline surveys. See the applicable sections for specific measures necessary for minimization and mitigation of impacts to critical saltwater habitats.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
356	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.3.d Shorten shellfish bed definitions to "shellfish beds, natural"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
357	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation D. Critical Saltwater Habitats D.3.d DEFINITION: Natural shellfish beds Locations where a shellfish species occupies more than 50% of an area of more than a few square meters (NOAA-Schaeffer et al. 2007). In Puget Sound, geoducks are found distributed in smaller patches and in beds of high abundance (Jamison et al. 1984); the average geoduck bed density is 2.1 geoducks/m2 (Goodwin and Pease 1991). Natural shellfish beds are found on hard substrate such as rock or shell aggregates or mud/shell mix, together with the associated water column (Feldman et.al. (2004). Critical Saltwater Habitats are habitats for priority (endangered, threatened, or sensitive) species; priority species have a primary association with Critical Saltwater Habitats. . Unnatural shellfish beds (those that do not exist in nature) are Critical Saltwater Habitats, under the control or management of resource users for growth and/or harvest including subsistence, commercial, and recreational areas, within which priority species have a primary association (Definition 19.150.265). The inclusion of commercial aquaculture in the Critical Saltwater Habitat definition does not limit its regulation as a use (WAC 173.26.221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
358	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation E. Geologically Hazardous Areas E. Development in designated geologically hazardous areas shall be regulated in accordance with the following (WAC 173-26-221): (A) Consult designation criteria for geologically hazardous areas, WAC 365-190-120. (B) Do not allow new development or the creation of new lots that would cause foreseeable risk from geological conditions to people or improvements during the life of the development. (C) Do not allow new development that would require structural shoreline stabilization over the life of the development. Exceptions may be made for the limited instances where stabilization is necessary to protect allowed uses where no alternative locations are available and no net loss of ecological functions will result. The stabilization measures shall conform to WAC 173-26-231. (D) Where no alternatives, including relocation or reconstruction of existing structures, are found to be feasible, and less expensive than the proposed stabilization measure, stabilization structures or measures to protect existing primary residential structures may be allowed in strict conformance with WAC 173-26-231 requirements and then only if no net loss of ecological functions will result.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
359	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation F. Wetlands F3. . Wetland use regulations (WAC 173-26-221). The county and local governments should consult the department's technical guidance documents on wetlands. Regulations shall address the following uses to achieve, at a minimum, no net loss of wetland area and functions, including lost time when the wetland does not perform the function: • The removal, excavation, grading, or dredging of soil, sand, gravel, minerals, organic matter, or material of any kind; • The dumping, discharging, or filling with any material, including discharges of stormwater and domestic, commercial, or industrial wastewater; • The draining, flooding, or disturbing of the water level, duration of inundation, or water table; The driving of pilings; • The placing of obstructions; • The construction, reconstruction, demolition, or expansion of any structure; • Significant vegetation removal, provided that these activities are not part of a forest practice governed under chapter 76.09 RCW and its rules;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
360	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation F. Wetlands F3. • Significant vegetation removal, provided that these activities are not part of a forest practice governed under chapter 76.09 RCW and its rules; • Other uses or development that results in an ecological impact to the physical, chemical, or biological characteristics of wetlands; or • Activities reducing the functions of buffers described in (c)(i)(D) of this subsection. . Alterations to wetlands. Master program provisions addressing alterations to wetlands shall be consistent with the policy of no net loss of wetland area and functions, wetland rating, scientific and technical information, and the mitigation priority sequence defined in WAC 173-26- 201(2)(e).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
361	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation F. Wetlands</p> <p>F3.</p> <p>. Buffers. The county and local governments shall contain requirements for buffer zones around wetlands. Buffer requirements shall be adequate to ensure that wetland functions are protected and maintained in the long term. Requirements for buffer zone widths and management shall take into account the ecological functions of the wetland, the characteristics and setting of the buffer, the potential impacts associated with the adjacent land use, and other relevant factors.</p> <p>. Mitigation. The county and local governments shall contain wetland mitigation requirements that are consistent with WAC 173-26-201 (2)(e) and which are based on the wetland rating.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
362	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation F. Wetlands</p> <p>F3.</p> <p>Compensatory mitigation. Compensatory mitigation shall be allowed only after mitigation sequencing is applied and higher priority means of mitigation are determined to be infeasible. Requirements for compensatory mitigation must include provisions for:</p> <p>(I) Mitigation replacement ratios or a similar method of addressing the following:</p> <ul style="list-style-type: none">• The risk of failure of the compensatory mitigation action;• The length of time it will take the compensatory mitigation action to adequately replace the impacted wetland functions and values;• The gain or loss of the type, quality, and quantity of the ecological functions of the compensation wetland as compared with the impacted wetland. <p>(II) Establishment of performance standards for evaluating the success of compensatory mitigation actions;</p> <p>(III) Establishment of long-term monitoring and reporting procedures to determine if performance standards are met; and</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
363	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation F. Wetlands</p> <p>F3.</p> <p>(IV) Establishment of long-term protection and management of compensatory mitigation sites. Credits from a certified mitigation bank may be used to compensate for unavoidable impacts.</p> <p>. Category III and IV Wetlands. The mitigation requirements of Title 24 TCC, Mitigation Requirements, will not be imposed for activities within:</p> <p>. Category III wetlands less than 2,500 square feet in size which are not:</p> <p>(1) Contiguous with a freshwater or estuarine system;</p> <p>(2) Located within shoreline jurisdiction; or</p> <p>(3) Part of a mosaic wetland complex, as set forth in Title 24 TCC...</p> <p>. Category IV wetlands less than 10,000 square feet in size that are not:</p> <p>(1) Contiguous with a freshwater or estuarine system;</p> <p>(2) Located within shoreline jurisdiction; or</p> <p>(3) Part of a mosaic wetland complex, as set forth in Title 24 TCC...</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
364	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>3. The applicant shall adhere to the mitigation sequencing requirements of TCC__ by locating regulated activities outside fish and wildlife habitat conservation areas and their associated buffers, as outlined in TCC Section ____.</p> <p>a. Where avoidance is not possible, encroachment into the standard or modified buffer, as allowed by TCC Section ____, cannot be avoided, the applicant may minimize review or mitigation requirements by following the buffer modification allowance of TCC ____ and the standards outlined in this chapter.</p> <p>b. When the buffer modification allowance or Standard is not applicable or feasible, if a regulated activity cannot meet the requirements of this chapter, an applicant may need to pursue a variance or reasonable use exception as outlined in TCC ____.</p> <p>4. When the Department determines that mitigation is necessary to offset the identified impacts from a proposed development, the applicant shall comply with the mitigation requirements set forth in TCC____.</p> <p>5. Wetlands shall be regulated pursuant to the requirements contained in chapter __TCC.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
365	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>Fish and Wildlife Habitat Conservation Areas. (WAC 365-190-130) Fish and Wildlife Habitat Conservation Areas contribute to the state's biodiversity and occur on both publicly and privately owned lands. These critical habitats support regulated and unregulated fish and wildlife species. Habitats associated with Federal- and State-listed species are areas with a primary association with species of fish or other wildlife that, if altered, may reduce the likelihood the species will survive and reproduce over the long term. Federally-listed fish and wildlife are endangered, threatened, or candidate species; State-listed as endangered, threatened, sensitive, candidate, or monitored species. Contact the Washington Department of Fish and Wildlife (WDFW) Habitat (Priority Habitats and Species) Program and Washington Department of Natural Resources (WDNR) Natural Heritage Program and Aquatic Resource Program for more information. (from Pierce Co)</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
366	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>Species of Local Importance and their Associated Habitats. (WAC 365-190-130) (from Thurston Co) In addition to federally- and state-listed species, the following fish and wildlife species and their associated habitat areas shall be regulated under this Chapter:</p> <p>1. Fish: (from Coho salmon, Chinook salmon, bull trout, pink salmon, chum salmon, sockeye salmon, cutthroat trout, native/wild rainbow trout/steelhead, greenlings (lingcod), Pacific whiting, smelt (longfin, surfsmelt), herring, and sandlance (Pacific) and spawning areas.</p> <p>2. Birds. Osprey</p> <p>3. Vulnerable Aggregations. Vulnerable aggregations of fish and wildlife species as defined in the WDFW Priority Habitats and Species/Heritage Program that reside in Thurston County. A list of vulnerable aggregations of fish and wildlife species found in Thurston County is available at the Thurston County Planning and Land Services Department.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
367	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>Habitats of Local Importance. (per WAC 365-190-130) (from Thurston Co) Documented habitat areas or potential habitat areas and point locations for fish and wildlife species. These areas include specific habitat types, which are infrequent in occurrence in Thurston County and may provide specific habitats in which endangered, threatened, sensitive, candidate, or monitor fish and wildlife species have a primary association, such as breeding habitat, winter range, and movement corridors. These areas include the following:</p> <p>1. Oregon white oak trees and woodlands. Oregon white oak woodlands, stands, and individual trees meeting the following criteria shall be considered priority habitat and shall be subject to protection under the provisions of this Chapter:</p> <p>a. Priority Oregon White Oak Woodlands. Stands of Oregon white oak or oak/conifer associations where the stand is at least one acre in size and the canopy coverage of the oak component of the stand is greater than or equal to 25% percent. (See Figure TCC___)</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
368	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>b. Significant Oaks and Stands. Within the urban growth area, single oaks or stands of oaks smaller than one acre in size when any of the following criteria are met:</p> <p>(1) Individual trees having a diameter at breast height of 20 inches or more; or</p> <p>(2) Oregon white oak stands in which the oak trees have an average diameter at breast height of 15 inches or more regardless of stand size.</p> <p>2.Prairies.</p> <p>3. Old growth/mature forests.</p> <p>4. Caves.</p> <p>5. Cliffs.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
369	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>b. Significant Oaks and Stands. Within the urban growth area, single oaks or stands of oaks smaller than one acre in size when any of the following criteria are met:</p> <p>6. Snag-rich areas and downed logs. Priority logs are > 30 cm (12 in) in diameter at the largest end, and > 6 m (20 feet) long. Priority snag and downed log habitat includes individual snags and/or logs, or groups of snags and/or logs of exceptional value to wildlife due to their scarcity or location in a particular landscape. Areas with abundant, well-distributed snags and logs are also considered priority snag and log habitat. Examples include large, sturdy snags adjacent to open water, remnant snags in developed or urbanized settings, and areas with a relatively high density of snags.</p> <p>7. Elk herd winter range.</p> <p>8. Talus. Talus areas that support pica or rock rabbit, Van Dyke's salamander, western redback salamander, northern alligator lizard, or western fence lizard.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
370	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5.</p> <p>9. Saltwater Habitats of Special Concern. (WAC 220-660-320)</p> <p>(1) A person may request information from the department about the location of saltwater habitats of special concern.</p> <p>(2) Saltwater Habitats of Special Concern are habitats that provide essential functions in the development of priority fish species, including the following:</p> <p>(i) Pacific sand lance (Ammodytes hexapterus) spawning beds are located in the upper beach area in saltwater areas typically composed of fine to coarse sand and small gravel;</p> <p>(ii) Surf smelt (Hypomesus pretiosus) spawning beds are located in the upper beach area in saltwater areas typically composed of sand and/or small gravel and shell material;</p> <p>(iii) Pacific herring (Clupea pallasii) spawning beds are located in lower beach areas and shallow subtidal areas in saltwater areas. Spawning substrate may consist of seagrass, kelp and other macroalgae, and other structure such as subtidal worm tubes;</p> <p>(iv) Lingcod (Ophiodon elongatus) nesting areas are located in high-relief rock;</p> <p>(v) Lingcod (Ophiodon elongatus) settlement and nursery areas are located in beach and subtidal areas with sand, seagrass beds, subtidal worm tubes, and other materials;</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
371	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 9. Saltwater Habitats of Special Concern. (WAC 220-660-320) (vi) Rockfish (Sebastes spp.) settlement and nursery areas are located in kelp and other macroalgae beds, seagrass beds, and pinnacles, boulders, and other structurally complex habitats; (vii) Juvenile salmonid (family Salmonidae) migration corridors and rearing and feeding areas are common throughout estuarine, intertidal and shallow subtidal saltwater areas of the state; (viii) Olympia oyster (Ostrea conchaphila) settlement areas are located in sheltered bays and estuaries near 0.0 feet MLLW; (ix) Seagrasses (Zostera marina, Ruppia maritima and Phyllospadix spp.) beds; (x) Kelp (order Laminariales) beds; (xi) Macroalgae species Pacific herring use as spawning substrate; (xii) Intertidal wetland vascular plant areas (except noxious aquatic weeds); and (xiii) Native riparian vegetation zones.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
372	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 9. Saltwater Habitats of Special Concern. (WAC 220-660-320) (xiii) Native riparian vegetation zones. (3) Nearshore zone geomorphic processes that form and maintain saltwater habitats of special concern: (i) The location and construction of hydraulic projects should avoid impacts to geomorphic processes that create and maintain nearshore zone habitat. Geomorphic processes are difficult to replace or compensate for. (ii) The following are nearshore geomorphic processes that form and maintain saltwater habitats of special concern: (a) Sediment supply and transport; (b) Beach and bluff erosion and sediment accretion; (c) Distributary channel migration; and (d) Tidal channel formation and maintenance.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
373	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 10. Waters of the State and/or natural waters and adjacent riparian-shoreline areas (165 feet landward measured from the ordinary high water mark) including: a. All water bodies classified by the Washington Department of Natural Resources (WDNR) water typing classification system (WAC 222-16-030 and -031). b. All waters that support regulated fish or wildlife species (i.e., areas that have connectivity to fish bearing waters and may potentially provide habitat given no natural barriers to fish passage). c. Ponds and their submerged aquatic beds. d. Side channels and/or off-channel habitat. 11. Estuaries and tidal marshes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
374	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 12. Connectable relic channels and oxbows. A relic channel or oxbow may be considered connectable when any of the following criteria are met: a. The channel or oxbow is associated with the river during high flow events; b. The depth of the channel or oxbow is at or very near the groundwater elevation; c. The channel or oxbow is likely to be captured by the river during high flow events; d. Excavation between the channel or oxbow and river will not result in adverse impacts to local groundwater levels or adjacent wetlands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
375	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 13. Wetlands (refer to Chapter TCC__). 14. Heron rookeries. 15. Cavity nesting duck habitat. 16. Western bluebird non-artificial nesting sites. Additional saltwater habitats in need of critical protection of shoreline ecological functions and processes include: Forage fish holding areas, natural shellfish areas, mudflats, and areas with which priority species have a primary association..	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
376	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. Forage Fish Spawning and Herring Holding Areas. 1. Regulated activities waterward of the ordinary high water mark (OHWM), in areas of confirmed spawning habitat, shall be suspended during spawning periods unless a survey by a qualified professional, defined in TCC__, confirms that spawning is not occurring, or, approval is obtained from Washington State Department of Fish and Wildlife (WDFW). 2. Regulated activities in areas where a survey demonstrates that no spawning is occurring are still subject to avoidance and minimization requirements of TCC__.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
377	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. Forage Fish Spawning and Herring Holding Areas. Potential Fish and Wildlife Habitat Conservation Area Review (per WAC 365-190-130). To create a system of fish and wildlife habitats with connections between larger habitat blocks and open spaces, in accordance with WAC 365-190-130, Thurston County and cities of the county should integrate potential habitats with open space corridor planning where appropriate. Potential fish and wildlife habitat conservation areas requiring review include areas that have sufficient evidence of the presence of regulated fish or wildlife species to require a review. Potential regulated fish and wildlife habitat conservation areas are determined using the following criteria:</p> <p>1. A habitat area identified on a map listed in TCC Appendix __ (includes, but not limited to, breeding habitat, winter ranges, movement corridors, kelp and eelgrass beds, shellfish areas, oak woodlands, rivers, streams, lakes, ponds, etc., as outlined in TCC __, including the adjacent 165 feet surrounding the habitat area. Note: the 165 foot* distance around rivers, streams, lakes, and ponds shall be measured from the ordinary high water mark.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
378	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. Forage Fish Spawning and Herring Holding Areas. Potential Fish and Wildlife Habitat Conservation Area Review (per WAC 365-190-130). To create a system of fish and wildlife habitats with connections between larger habitat blocks and open spaces, in accordance with WAC 365-190-130, Thurston County and cities of the county should integrate potential habitats with open space corridor planning where appropriate. Potential fish and wildlife habitat conservation areas requiring review include areas that have sufficient evidence of the presence of regulated fish or wildlife species to require a review. Potential regulated fish and wildlife habitat conservation areas are determined using the following criteria:</p> <p>2. A point location identified on one of the maps listed in TCC — Appendix __. (including, but not limited to, nests, dens, rookeries, etc.) plus the adjacent 800 feet* surrounding the point location. (*from Thurston County)</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
379	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. Forage Fish Spawning and Herring Holding Areas. Potential Fish and Wildlife Habitat Conservation Area Review (per WAC 365-190-130). To create a system of fish and wildlife habitats with connections between larger habitat blocks and open spaces, in accordance with WAC 365-190-130, Thurston County and cities of the county should integrate potential habitats with open space corridor planning where appropriate. Potential fish and wildlife habitat conservation areas requiring review include areas that have sufficient evidence of the presence of regulated fish or wildlife species to require a review. Potential regulated fish and wildlife habitat conservation areas are determined using the following criteria:</p> <p>3. Bald eagle foraging areas (1/2 mile from the nest in either direction along the shoreline and 250 feet landward measured from the ordinary high water mark).</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
380	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. Fish and Wildlife Habitat Conservation Area Review — Procedures (from Pierce Co) 1. County GIS (Geographic Information System) maps provide an indication of critical regulated fish and wildlife habitat location, within the County.The presence or location of a potential regulated fish or wildlife species, habitat area, or point location that has not been mapped, but that may be present on or adjacent to a site, shall be determined using the procedures and criteria established in this Chapter.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
381	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. 2. The Department will complete a review of the County GIS Critical Fish and Wildlife Habitat Area maps, the WDNR Natural Heritage Program’s database, and other sources and documents, for any proposed regulated activity to determine whether the site for the regulated activity is located within a potential regulated fish or wildlife habitat. Identification of a potential regulated fish or wildlife habitat area may also occur as a result of field investigation conducted by Department or Washington Department of Fish and Wildlife (DFW) staff.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
382	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. Fish and Wildlife Habitat Conservation Area Review — Procedures (from Pierce Co) 3. Except as allowed in TCC Waivers, when the Department’s maps, sources, or field investigation indicates that the site for a proposed regulated activity is located within a potential regulated fish or wildlife habitat area, the Department shall require the submittal of a fish and wildlife application and the completion of a Habitat Assessment. The Habitat Assessment shall be documented as set forth in subsection TCC __.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
383	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas</p> <p>E.A.5. 4. When the Department confirms that the waiver requirements of TCC__ have been met, title and land division notification, and critical area boundary identification requirements may still be imposed.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
384	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 5. Projects undergoing review for regulated fish and wildlife habitat areas shall be routed to tribal agencies with jurisdiction for review. Tribes will have an opportunity to provide specific species or habitat related information on proposed development sites. If necessary, the Department will seek additional assistance from the WDFW, WDNR-NHP, and other appropriate State and Federal agencies	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
385	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 6. Approval of a fish and wildlife application shall be granted upon a determination that the habitat assessment and mitigation plan, if applicable, are thorough and accurate and meet all requirements of this TCC section.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
386	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 7. If application of the standards contained in this Chapter would deny all reasonable use of a site, the applicant may pursue a Reasonable Use Exception as set forth in TCC__.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
387	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 8. Unless otherwise stated in this Chapter, the critical area protective measure provisions contained in TCC __ shall apply.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
388	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. (From Pierce County) B. Standards for Minimizing Critical Habitat Review and Mitigation Requirements Upon demonstration that avoidance and minimization are not possible, the following activities may be used to minimize review and mitigation requirements, subject to the following standards:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
389	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. (From Pierce County) Standards for Other Critical Habitat Areas. a. Standards for critical habitat areas not listed in Fish and Wildlife Conservation Areas shall be administratively developed by the Department in consultation with the Washington Department of Fish and Wildlife (WDFW). The administrative standards shall be on file with the Department prior to implementation and made available to the public upon request. b. Standards shall be based upon the needs of species or habitat areas of study. c. The Department shall utilize the published WDFW PHS management recommendations. An applicant may request the Department consult directly with the WDFW on a project specific basis at any time prior to the issuance of the fish and wildlife habitat approval. Once issued, the fish and wildlife habitat approval may be appealed following the procedures set forth in TCC__	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
390	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. (From Pierce County) 1. Clearing and Grading. When clearing and grading is permitted as part of an authorized regulated activity or as otherwise allowed in these standards, the following shall apply: a. Grading is allowed only during the dry season, which is typically regarded as beginning on May 1st and ending on October 1st of each year, provided that the Department may extend or shorten the dry season on a case-by-case basis, determined on actual weather conditions. Clearing and grading may be allowed during the wet season if all drainage will flow away from any waterbody/ watercourse. b. Filling or modification of a wetland or wetland buffer is permitted only if it is conducted as part of an approved wetland permit issued by the Department.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
391	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. (From Pierce County) 1. c. The soil duff layer shall remain undisturbed to the maximum extent possible. Where feasible, any soil disturbed shall be redistributed to other areas of the project site. d. The moisture-holding capacity of the topsoil layer shall be maintained by minimizing soil compaction or reestablishing natural soil structure and infiltrative capacity on all areas of the site that impervious surfaces do not cover. e. Erosion and sediment control that meets or exceeds the standards set forth in the Thurston County Stormwater Drainage Manual shall be provided.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
392	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 2. Vegetation Removal, Disturbance, and Introduction. Limited vegetation removal shall be allowed subject to the following standards: a. Hazard trees may be cut provided: (1) The applicant submits a report from a certified arborist, licensed landscape architect, or professional forester that documents the hazard and provides a replanting schedule for the replacement trees and receives written approval from Thurston County authorizing tree removal;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
393	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 2. Vegetation Removal, Disturbance, and Introduction. Limited vegetation removal shall be allowed subject to the following standards: a. Hazard trees may be cut provided: (2) Tree cutting shall be limited to limbing and crown thinning, unless otherwise justified by the landowner's expert. Where limbing or crown thinning is not sufficient to address the hazard, trees should be topped to remove the hazard rather than cut at or near the base of the tree. All vegetation cut (tree stems, branches, tops, etc.) shall be left within the critical area or buffer unless removal is warranted due to the potential for disease transmittal to other healthy vegetation;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
394	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 2. Vegetation Removal, Disturbance, and Introduction. Limited vegetation removal shall be allowed subject to the following standards: a. Hazard trees may be cut provided: (3) The landowner shall replace any trees that are felled or topped with new trees at a ratio of two replacement trees for each tree felled or topped. Tree species that are native and indigenous to the site shall be used; (4) Hazard trees determined to pose an imminent threat or danger to public health or safety, or to public or private property, or serious environmental degradation may be removed or topped by the landowner prior to receiving written approval from Thurston County provided that within 14 days following such action, the landowner shall submit the necessary report and replanting schedule demonstrating compliance with TCC___ above.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
395	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 3. Fencing. a. Fencing shall be placed to maintain wildlife movement corridors. Fencing shall not create any fish passage blockages. b. The Department has the authority to approve the location, type, and height of any proposed or required fencing unless superseded by any Federal or State agency approvals.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
396	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 4. Shoreline Erosion Control Measures. New shoreline erosion control measures, or replacement structures that either expand the area protected or increase the impacts of such structures on regulated fish or wildlife habitat, shall be subject to the following standards: a. The proposal complies with the provisions set forth in Chapter ____. b. The applicant has submitted a habitat assessment report, as set forth in TCC____.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
397	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 4. Shoreline Erosion Control Measures. c. The Habitat Assessment Report demonstrates the following: (1) Natural shoreline processes will be maintained. The project will not result in increased beach erosion or alterations to, or loss of, shoreline substrate within 1/4 mile of the site. (2) The shoreline erosion control measure will not adversely impact critical fish or wildlife habitat areas or associated wetlands. (3) Adequate mitigation measures, as set forth in TCC___, are provided that ensure no net loss of intertidal or riparian habitat or function occurs as a result of the proposed shoreline erosion control measure. (4) No alteration of intertidal migration corridors occurs as a result of the proposed shoreline erosion control measure.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
398	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 5. Streambank Stabilization. Streambank stabilization to protect new structures from future channel migration is not permitted except when such stabilization is achieved through bioengineering or soft armoring techniques or public flood control projects. Streambank stabilization shall comply with the provisions set forth in TCC___	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
399	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 6. Launching Ramps. Public or Private. Launching ramps may be allowed when the applicant has submitted a habitat assessment report as set forth in TCC Section__ that has demonstrated the following: a. The project will not result in increased beach erosion or alterations to, or loss of, shoreline substrate within 1/4 mile of the site. b. The ramp will not adversely impact critical fish or wildlife habitat areas or associated wetlands. c. Adequate mitigation measures, as set forth in TCC Section__, are provided that ensure no net loss of intertidal or riparian habitat or function occurs as a result of the ramp. d. No alteration of intertidal migration corridors as a result of the ramp.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
400	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 7. Docks. Repair and maintenance of an existing dock or pier or construction of a new dock or pier shall be permitted subject to the following: a. Repair and maintenance - There is no: (1) Increase in the use of materials creating shade for predator species or eelgrass; (2) Expansion in overwater coverage; (3) New spanning of waters between 3 and 13 feet deep; (4) Increase in the size and number of pilings; and (5) Use of toxic materials (such as creosote) that come in contact with the water. b. New docks and piers are subject to compliance with conditions in accordance with the WDFW HPA or US Army Corps of Engineers permits and mitigation required by the county to ensure no net loss of regulated species or habitat or shoreline function.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
401	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 8. Roads, Trails, Bridges, and Rights-of-Way. Construction of trails, roadways, and minor road bridging may be allowed subject to the following standards: a. There is either no feasible alternative route with less impact on the environment or it has been approved by the County Council as part of a nonmotorized public trail system. b. The crossing allows for uninterrupted downstream movement of wood and gravel. c. Mitigation, pursuant to TCC__, for impacts is provided. d. Road bridges are designed according to the WDFW Fish Passage Design at Road Culverts, Habitat and Lands Environmental Division, March, 1999 and the NMFS Guidelines for Salmonid Passage at Stream Crossings, 2000. e. Trails and associated viewing platforms shall be made of pervious materials. .	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
402	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 9. Utility Facilities. b. New utility lines and facilities are permitted to cross regulated streams and bodies of water if they comply with the following standards: (1) Avoid critical fish and wildlife habitat areas to the maximum extent possible. (2) Crossings are contained within the footprint of an existing road or utility crossing where possible.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
403	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 9. Utility Facilities. a. Installation of a utility is permitted if constructed in an existing, improved roadway, driveable drivable surface or shoulder, in Thurston County rights-of-way subject to compliance to the Thurston County Manual on Accommodating Utilities in the Right-of-Way road.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
404	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 9. Utility Facilities. b. New utility lines and facilities are permitted to cross regulated streams and bodies of water if they comply with the following standards: (3) Avoid paralleling the stream or following a down-valley course near the channel. (4) Do not increase or decrease the natural rate of shore migration or channel migration. (5) Bore beneath the scour depth and hyporheic zone of the water body and CMZ where feasible. Whenever boring under the channel is not feasible then any channel crossings shall occur at an angle that is between 60 and 90 degrees from the centerline of the channel.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
405	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 10. Public Flood Protection Measures. New public flood protection measures and expansion of such existing measures may be approved, subject to the County's review and approval of a habitat assessment report or the approval of a Federal Biological Assessment.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
406	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 11. Instream Structures. New in-stream structures shall be allowed as part of an approved mitigation or restoration project or a watershed basin plan, upon submittal of required State or Federal permits, and approved by the County. Structures shall be designed to avoid modifying flows or degrading water quality. In-stream structures include, but are not limited to, high flow bypass, sediment ponds, in-stream ponds, retention or detention facilities, tide gates, dams, weirs, engineered wood systems.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
407	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 12. Stormwater Conveyance Facilities. Conveyance structures whose sole purpose is to convey stormwater already treated for quality, or water bypassed around water quality treatment facilities pursuant to an approved stormwater plan, may be constructed subject to the following standards: a. No other feasible alternatives with less impact exist; b. Mitigation for impacts is provided; c. Stormwater conveyance facilities shall incorporate fish habitat features; d. Vegetation shall be maintained and, if necessary, added adjacent to all open channels and ponds in order to retard erosion, filter out sediments, and shade the water.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
408	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 13. On-Site Sewage Systems and Wells. a. New on-site sewage systems and individual wells are permitted if accessory to an approved structure. b. Repairs to failing on-site sewage systems associated with an existing structure shall be accomplished by utilizing one of the following methods that result in the least impact: (1) Connection to an available public sewer system pursuant to TCC__; (2) Replacement with a new on-site sewage system located in a portion of the site that has already been disturbed by development and is located landward as far as possible, provided the proposed sewage system is in compliance with the provisions in section TCC__ or (3) Repair to the existing on-site sewage system.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
409	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 14. New Agricultural Activities. New agricultural activities are permitted subject to the following: a. Agricultural activities and structures shall comply with the provisions of TCC__ Flood Hazard Areas. b. The agricultural activity is in compliance with the USDA, NRCS farm management standards. c. A copy of an approved NRCS or Thurston County Conservation District farm management plan that documents compliance with the USDA, NRCS farm management standards has been submitted to the Department for review and approval.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
410	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 15. Alteration of Watercourses. Alterations and relocations of watercourses, including stabilization projects, shall not degrade fish habitat and shall be subject to the following provisions: a. Structures that cross all watercourse and water bodies shall meet fish habitat requirements of the Washington State Department of Fish and Wildlife (WDFW). b. Any culverts that are used on fish-bearing watercourses shall be arch/bottomless culverts or equivalent that provides comparable fish protection, and must meet fish habitat requirements of the latest edition of WDFW's Design Manual for Culverts.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
411	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 15. Alteration of Watercourses. c. Bridges or other crossings shall allow for uninterrupted downstream movement of wood and gravel, be as close to perpendicular to the watercourse as possible, and be designed to minimize fill and to pass the base flood flows. d. Watercourse alterations shall maintain natural meander patterns, channel complexity, and floodplain connectivity. Where feasible, such characteristics shall be restored as part of the watercourse alteration. e. Applicant shall identify the channel migration zone for the watercourse at the project site and for a reasonable reach upstream and downstream of the site, and shall not undertake actions as part of the alteration that would in any way inhibit movement of the channel.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
412	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 15. Alteration of Watercourses f. Existing culverts that do not meet fish habitat requirements shall be removed or replaced as part of an approved watercourse alteration project. g. Watercourse alteration projects shall not result in a fish blockage of side channels. Known fish barriers into side channels shall be removed as part of the approved watercourse alteration project. h. For any watercourse alteration of a Type S or F water (pursuant to TCC __) whose channel is subject to migration, bioengineered (soft) armoring of streambanks is required to allow for woody debris recruitment, gravels for spawning, and creation of side channels. The bioengineering technique used must be designed in accordance with the latest edition of WDFW's Integrated Streambank Protection Guidelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
413	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 16. Artificial Channels – Type FW. a. New activities adjacent to artificial channels – type FW are exempt from the buffering provisions of TCC__. b. Protection of these channels will be provided through compliance with all of the following: (1) A 15-foot building setback shall be maintained from the ordinary high water mark or top of bank of the channel. (2) Clearing and grading activities within the building setback shall comply with the requirements of TCC__. (3) A silt fence shall be installed along the outer edge of the developed area, which shall be no closer to the channel than the top of bank or ordinary high water mark.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
414	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 16. Artificial Channels – Type FW. c. The Department may also require the applicant to do any of the following: (1) Post signs along the channel indicating the presence of the fish and wildlife habitat area. Sign design shall be established by the Department. (2) Construct permanent fencing along the top of bank of the channel. Any proposed channel alteration will require the submittal of a fish and wildlife application, as set forth in TCC__, and a Habitat Assessment report as defined within TCC – Appendix __.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
415	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	Commenter alterations to Mitigation G. Fish and Wildlife Habitat Conservation Areas E.A.5. 17. Wildfire Defensible Space Activities. Within existing lots of record located in wildland areas, creation of a defensible space for protection against wildfire may be allowed in buffer areas located within 30 feet of dwellings, barns, and commercial- use buildings. These allowances do not apply to features such as swing sets, fences, dog houses, and other structures that can be easily relocated. The following defensible space activities may be allowed: a. Tree limb removal. Where understory shrubs are present below the tree, removal shall follow the guidelines of TCC – Appendix __. Where understory shrubs are not present, tree limbs may be removed to a height of 10 feet above the ground; b. Interruption of continuous shrub vegetation by selective thinning as defined in TCC – Appendix __; c. Replacement of evergreen species with less flammable, native species as defined in TCC – Appendix __.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
416	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to 400.120 Change section title to simply "Vegetation Conservation"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
417	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations Retention of existing vegetation, including existing trees, shall be a priority within each shoreline jurisdiction. Significant trees, as identified in Table ____, cannot be removed without approval of a vegetation planting plan. Prior to proposing tree removal, the land owner shall evaluate alternate means of achieving their development goals, such as selective limbing and tree topping.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
418	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations Vegetation conservation standards shall not be applied retroactively in a way which that requires lawfully existing uses and developments (as of the effective date of this Program), including residential landscaping and gardens, to be removed, except when required as mitigation for new or expanded development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
419	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Adopt... Vegetation Planting Plan. [From Pierce County] When vegetation is removed or disturbed within a standard shoreline buffer in excess of the vegetation removal allowances described in TCC ____, the applicant shall prepare and implement a Vegetation Planting Plan. The Plan shall be submitted for review with a site development or building permit application subject to the following requirements: a. Mitigation for loss of vegetation within the standard shoreline buffer shall generally consist of replanting an area equal to or greater than the area of vegetation that was removed or disturbed, except that in those instances when a standard shoreline buffer is reduced, replacement at a greater ratio may be required. Additional forms of mitigation, such as the installation of habitat features, may also be proposed; b. Vegetation to be disturbed should not be concentrated along the shoreline, and the first priority for planting shall be adjacent to the ordinary high water mark;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
420	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. e. Vegetation Planting Plans shall identify the following: (1) The location and area of the vegetation loss; (2) The location of an equal area, or areas, to be planted; (3) No less than one tree species, two shrub species, and two groundcover species; and (4) The number of plants as specified in Table TCC____, below. [Proposed Vegetation Conservation Mitigation Planting] f. Monitoring of vegetation planted according to the planting plan shall be provided as follows: (1) Pre-planting photos; and (2) Photos taken in a consistent fashion at established locations and at intervals of 6, 12, and 24 months.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
421	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Oregon White Oak Trees and Woodlands. (from Pierce Co) 1. Habitat Protection. Oak woodlands, stands, and individual trees meeting the criteria set forth in TCC____ shall be protected as follows: a. Priority Oregon White Oak Woodlands. (1) Priority Oregon white oak woodlands shall be protected through inclusion within a conservation tract or alternative protective mechanism meeting the requirements set forth in TCC____. The tract shall extend a minimum of 5 feet beyond the outermost dripline of the trees within the woodland. (2) A minimum of 80% percent of the Oregon white oak trees on site having a diameter at breast height of six inches or larger shall be preserved within the conservation tract. (3) The conservation tract shall be maintained in an undisturbed state except for periodic watering, grass mowing of not more than four times per year, and hand removal of noxious or invasive plants, including conifer seedlings and saplings.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
422	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Oregon White Oak Trees and Woodlands. (from Pierce Co) 1.a. (4) No clearing, grading, filling, or construction of any kind shall occur within the conservation tract. (5) Use of pesticides, herbicides, rodenticides, fungicides, or fertilizers in the conservation tract shall be prohibited. (6) All oak snags and broken, diseased and dying oak trees and live oak trees with cavities, heartwood rot, and insect infestations shall be retained within the conservation tract. (7) Downed or felled oak trees within the conservation tract shall be retained, provided that such trees may be selectively cut to further enhance habitat value. (8) Top-cut (leave main trunk standing) selective oak trees in dense, even-aged oak stands to encourage oak regeneration and create oak snags. Select top- cut, prune, or limb these individual oaks between December and May. Very old or large oaks as defined in TCC__ shall not be removed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
423	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Oregon White Oak Trees and Woodlands. (from Pierce Co) (9) Conifers that encroach on oaks within a conservation tract may be removed. (10) Plant Oregon white oak acorns and oak seedlings to encourage regeneration as necessary in conservation tracts. b. Significant Oaks and Stands. (1) Significant Oaks. Seventy percent of all Oregon white oaks having a diameter at breast height of 20 inches or greater shall be preserved. (2) Significant Oak Stands. A minimum of 50% percent of the Oregon white oak trees within the stand shall be preserved. (3) Downed or felled oak trees and snags within significant oak stands shall be retained when located within a tract of land separate from individually owned lots. (4) The largest of the significant trees on the site shall be preserved within a conservation tract. The remaining trees may be located within individually owned lots or a separate tract(s) at the discretion of the developer.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
424	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Oregon White Oak Trees and Woodlands. (from Pierce Co) 2. Protection of Trees During Construction. Trees conserved pursuant to this subsection shall be protected before and during site development and construction through adherence to the following requirements: a. A tree protection area shall be designed to protect each tree or tree stand during site development and construction. Tree protection areas may vary widely in shape, but must extend a minimum of 5 feet beyond the existing tree canopy area along the outer edge of the dripline of the tree(s), unless otherwise approved by the Department. b. Tree protection areas shall be added and clearly labeled on all applicable site development and construction drawings, submitted to the Department.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
425	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Oregon White Oak Trees and Woodlands. (from Pierce Co) 2. Protection of Trees During Construction. Trees conserved pursuant to this subsection shall be protected before and during site development and construction through adherence to the following requirements: c. Temporary construction fencing at least 30 inches tall shall be erected around the perimeter of the tree protection areas prior to the initiation of any clearing or grading. The fencing shall be posted with signage clearly identifying the tree protection area. The fencing shall remain in place through site development and construction. d. No clearing, grading, filling, or other development activities shall occur within the tree protection area, except where approved in advance by the Department and shown on the approved plans for the proposal.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
426	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations 3. Oregon White Oak Trees and Woodlands. (from Pierce Co) 2. Protection of Trees During Construction. Trees conserved pursuant to this subsection shall be protected before and during site development and construction through adherence to the following requirements: e. No vehicles, construction materials, fuel, or other materials shall be placed in tree protection areas. Movement of any vehicles within tree protection areas shall be prohibited. f. No nails, rope, cable, signs, or fencing shall be attached to any tree proposed for retention. g. The Department may approve the use of alternate tree protection techniques if an equal or greater level of protection will be provided.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
427	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations Protection of Trees During Construction. Trees conserved pursuant to this subsection shall be protected before and during site development and construction through adherence to the following requirements: a. A tree protection area shall be designed to protect each tree or tree stand during site development and construction. Tree protection areas may vary widely in shape, but must extend a minimum of 5 feet beyond the existing tree canopy area along the outer edge of the dripline of the tree(s), unless otherwise approved by the Department. b. Tree protection areas shall be added and clearly labeled on all applicable site development and construction drawings, submitted to the Department.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
428	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations Protection of Trees During Construction. Trees conserved pursuant to this subsection shall be protected before and during site development and construction through adherence to the following requirements: c. Temporary construction fencing at least 30 inches tall shall be erected around the perimeter of the tree protection areas prior to the initiation of any clearing or grading. The fencing shall be posted with signage clearly identifying the tree protection area. The fencing shall remain in place through site development and construction. d. No clearing, grading, filling, or other development activities shall occur within the tree protection area, except where approved in advance by the Department and shown on the approved plans for the proposal.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
429	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations Protection of Trees During Construction. Trees conserved pursuant to this subsection shall be protected before and during site development and construction through adherence to the following requirements: e. No vehicles, construction materials, fuel, or other materials shall be placed in tree protection areas. Movement of any vehicles within tree protection areas shall be prohibited. f. No nails, rope, cable, signs, or fencing shall be attached to any tree proposed for retention. g. The Department may approve the use of alternate tree protection techniques if an equal or greater level of protection will be provided.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
430	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to A. General Regulations Submerged Aquatic Vegetation (SAV). Eelgrass, kelp, and intertidal vascular plants shall be protected by maintaining an undisturbed area between regulated activities described in Table __ and the boundary of the bed. Limited activity may occur within the undisturbed area (i.e., foot traffic and temporary storage of materials associated with permitted activities). Table __ indicates what the required undisturbed area width is for each type of regulated activity.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
431	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. General Buffer Requirements. (from Pierce County) a. Buffers shall be required as set forth for each habitat type. The required buffers shall be delineated, both on a site plan or plat and on the property, prior to approval of any regulated activity. b. Buffers should be adequately vegetated with native, non-invasive plant and tree species necessary to help provide long term protection of identified habitat areas. The Department may require mitigation and the submittal of a buffer enhancement plan, as outlined in TCC__, for buffer areas where the vegetation is inadequate to provide this function.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
432	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Critical area buffers may be greater than standard shoreline buffers. See Fish and Wildlife Habitat Conservation Area regulations for buffer and setback regulations. 2. A shoreline buffer may not be reduced through averaging more than 25 percent of the standard buffer width applied per TCC 24.30.045. Buffer reduction is allowed only when following the steps described in TCC 24.30.050/ as follows: (1) Avoidance of the impact to the buffer is not feasible due to topographic or other site constraints; (2) The buffer alteration is minimized or reduced by limiting the degree and magnitude of the proposal; (3) The buffer to be reduced is offset by an increase in the width of other portions of the buffer so that the total buffer area after alteration is no less than the buffer area prior to the alteration;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
433	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Critical area buffers may be greater than standard shoreline buffers. See Fish and Wildlife Habitat Conservation Area regulations for buffer and setback regulations. 2. A shoreline buffer may not be reduced through averaging more than 25 percent of the standard buffer width applied per TCC 24.30.045. Buffer reduction is allowed only when following the steps described in TCC 24.30.050/ as follows: (4) Changes to the configuration of the buffer area are consistent with other requirements set forth in the Master Program and with applicable requirements of TCC__, Development Regulations – Critical Areas; (5). The alteration to the buffer area will not result in a net loss of shoreline ecological function nor increase the risk of slope failure or downslope stormwater drainage impacts; and (6) The standard shoreline buffer shall not be averaged for commercial forestry in a Natural SED.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
434	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Standard Buffer Reduction. (from Pierce Co) The standard buffer, as indicated in Table ___ for the Residential or Conservancy SEDs, may be reduced up to a maximum of 25 percent when the applicant demonstrates all of the following: (1) Standard buffer averaging, as described above, is not feasible; (2) The reduction is unavoidable; (3) The proposed alteration is minimized by reducing or limiting the degree or mag-nitude of the proposal; (4) Changes to the configuration of the buffer area are consistent with other re-quirements set forth in the Master Program and with applicable requirements of Title __TCC, Development Regulations – Critical Areas;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
435	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Standard Buffer Reduction. (from Pierce Co) The standard buffer, as indicated in Table ___ for the Residential or Conservancy SEDs, may be reduced up to a maximum of 25 percent when the applicant demonstrates all of the following: (5) The alteration to the buffer area will not result in a net loss of shoreline ecological function nor increase the risk of slope failure or downslope stormwater drainage impacts; and 6) The buffer has less than 15 percent slopes.3. Additional SED Standards for Apply-ing the Reduced Standard Buffer, in a through f above. These standards apply within the Rural Conservancy and Natural designations and Sshorelines of Sstatewide Ssignificance (WAC 173-26-251). Buffers may be reduced for single-family residences and water-oriented uses in the Rural Conservancy designation, Natural designation, and Sshorelines of Sstatewide Ssignificance only under the following circumstances with appropriate mitiga-tion: a. The lot is physically constrained by slopes, wetlands or other natural features such that the Standard Buffer cannot be met; or b. The lot is legally constrained by its size or shape, such that it would not support a home and garage with a footprint of at least 1,200 square feet if placed at or above the Standard Buffer.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
436	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. Uses and Development Allowed within Standard Shoreline Buffer. (from Pierce Co) a. Water dependent uses and public shoreline access are allowed within the standard shoreline buffer subject to applicable regulations of the Master Program. b. An unpaved access path from a residential dwelling to the shoreline is allowed if: (1) The path width is limited to 4 feet; (2) The length of the path is minimized by keeping the path at a right angle to the shoreline to the degree feasible; and (3) No trees are removed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
437	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. Uses and Development Allowed within Standard Shoreline Buffer. (from Pierce Co) c. Up to 500 square feet or 25 percent of the area encompassed within the first 50 feet measured from the ordinary high water mark (OHWM) may be disturbed to accommodate shoreline access, landscaping, or minor construction associated with a water dependent use upon review and approval of a Vegetation Planting Plan pursuant to TCC___. Such disturbance shall not be concentrated nor span the extent of the shoreline at the water's edge.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
438	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. Expansion of Existing Development within Standard Shoreline Buffer. Expansion of legally existing development within the standard Shoreline buffer is allowed without a Shoreline Variance in the following instances: a. Expansion landward of existing development within a Shoreline buffer when an existing permanent substantial improvement serves to eliminate or greatly reduce the impact of the proposed expansion upon Shoreline ecosystem functions. Examples of features that may serve as a substantial improvement include permanent structures (such as homes and commercial buildings), larger paved areas (such as commercial parking lots and major roadways), dikes, and levees. Smaller structures (such as sheds and outbuildings) and smaller paved areas do not typically serve as substantial improvements.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
439	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. Expansion of Existing Development within Standard Shoreline Buffer. Expansion of legally existing development within the standard Shoreline buffer is allowed without a Shoreline Variance in the following instances: b. Development may be allowed in-line with existing development, parallel to the shoreline and no closer than the existing structure, when on existing impervious surfaces and when there is no loss of existing vegetation. c. Development is allowed upward, above an existing building footprint, provided applicable height limits of the Master Program and zone classification are satisfied.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
440	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. 1. Riparian Areas, Lakes, and Ponds. (from Pierce Co) a. Riparian areas (rivers, streams, and creeks), lakes, and ponds shall be managed through the use of buffers. Buffers shall be based upon the water type classification of the water body as established by the Department of NaturalResources Stream Typing Classification System. Refer to Table TCC__ for the water types and the associated buffer requirements. b. The required riparian buffer width is measured from the edge of the channel migration zone (CMZ), where identified, or the ordinary high water mark, whichever is greater. The criteria for determining the locations of the CMZ is provided in TCC. c. The required lake or pond buffer width is measured from the edge of the ordinary high water mark (OHWM). d. The required buffer shall be extended to include any adjacent regulated wetland(s), landslide hazard areas and/or erosion hazard areas and required buffers. (See Figures TCC__.)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
441	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. 2. Marine Waters Designated as Marine Shoreline Critical Salmon Habitat. a. Marine shoreline critical salmon habitat shall be managed through the use of buffers. Refer to Table TCC__ for the associated buffer requirements. b. The required buffer width is measured from the edge of the ordinary high water mark (OHWM). c. The required buffer shall be extended to include any adjacent regulated wetland(s), landslide hazard areas and/or erosion hazard areas and required buffers. (See FiguresTCC.)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
442	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. 3. Buffers for Other Critical Habitat Areas. Appropriate buffers for critical habitat areas not listed in Table TCC__ shall be determined on a case by case basis, based upon the needs of specific species or habitat area of study. The Department will coordinate with the Washington Department of Fish and Wildlife in these instances to determine an appropriate buffer width and when available shall rely upon buffer widths specified in WDFW Priority Habitats and Species management recommendations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
443	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	3.B. 3. Buffers for Other Critical Habitat Areas. Appropriate buffers for critical habitat areas not listed in Table TCC__ shall be determined on a case by case basis, based upon the needs of specific species or habitat area of study. The Department will coordinate with the Washington Department of Fish and Wildlife in these instances to determine an appropriate buffer width and when available shall rely upon buffer widths specified in WDFW Priority Habitats and Species management recommendations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
444	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Modification to Buffer Width Requirements. 2. Buffer Reduction. Buffer width reduction may be proposed through submittal of a habitat assessment study or report. Buffer width reduction shall be allowed only when the applicant demonstrates all of the following: a. Buffer reduction is unavoidable. b. Buffer reduction has been minimized by limiting the degree or magnitude of the regulated activity. c. Buffer reduction is consistent with other buffer requirements set forth under this TCC__ (e.g., wetlands, critical fish and wildlife species and habitats, landslide hazard areas, etc.) d. Buffer reduction will not adversely impact the water body. e. The buffer width will not be reduced more than 25 percent below the provisions of TCC__.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
445	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Modification to Buffer Width Requirements. 2. Buffer Reduction. Buffer width reduction may be proposed through submittal of a habitat assessment study or report. Buffer width reduction shall be allowed only when the applicant demonstrates all of the following: f. The buffer meets the requirements of TCC__, or g. A buffer enhancement plan is provided as required by TCC__. The buffer enhancement plan shall use plant species which are native and non-invasive to the project area. The plan must substantiate that the enhanced buffer will improve the functional attributes of the buffer to provide additional protection for habitat functional values. h. The buffer has less than 15 percent slopes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
446	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>3.B.</p> <p>Modification to Buffer Width Requirements.</p> <p>3. Buffer Width Increases. The Department may require an increased buffer width when a larger buffer is necessary, based on site conditions to protect habitat area functions and ecological values. This determination shall be reasonably related to protection of the functions and values of the regulated habitat area. Such determination shall demonstrate any of the following:</p> <p>a. A larger buffer is necessary to maintain viable populations of existing species or protect existing functions of habitat areas identified in TCC__.</p> <p>b. The adjacent land has minimal vegetative cover.</p> <p>c. The adjacent land has slopes greater than 20 percent.</p> <p>d. The habitat area is in an area of high tree blow down potential. In these cases the habitat area may be expanded an additional 50 feet on the windward side.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
447	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>3.B.</p> <p>3. Buffers for Other Critical Habitat Areas. Appropriate buffers for critical habitat areas not listed in Table TCC__ shall be determined on a case by case basis, based upon the needs of specific species or habitat area of study. The Department will coordinate with the Washington Department of Fish and Wildlife in these instances to determine an appropriate buffer width and when available shall rely upon buffer widths specified in WDFW Priority Habitats and Species management recommendations.</p> <p>Modification to Buffer Width Requirements.</p> <p>4. Where an application for a development permit, other than a site development permit, has not been submitted in association with a proposed forest practice activity, a deviation from the standard buffer, as set forth in TCC__ shall not be allowed.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
448	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Modification to Buffer Width Requirements.</p> <p>5. Buffer Reduction – Lakes. The standard buffer within a vacant lot along a lake may be reduced as follows:</p> <p>a. Where the vacant lot has a common property line with two or more lots which abut the ordinary high water line and which are developed with single-family residences, the standard buffer may be reduced to the greater of 50 feet or the average of the standard buffer and the setbacks of the residences on the adjacent properties. This reduction does not apply where the criteria of TCC__ apply.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
449	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Modification to Buffer Width Requirements.</p> <p>5. Buffer Reduction – Lakes. The standard buffer within a vacant lot along a lake may be reduced as follows:</p> <p>b. Any water dependent accessory use may be allowed within the reduced buffer upon the issuance of a Conditional Use Permit. The issuance of a Conditional Use Permit shall be predicated upon a determination that the project will be consistent with the Conditional Use criteria in this Section, and the Conditional Use criteria listed in WAC 173-14-140, if applicable, and will cause no reasonable adverse effects on the environment and other uses. The Conditional Use Criteria are:</p> <p>(1) Views from surrounding properties will not be unduly impaired.</p> <p>(2) Adequate separation will be maintained between the structure and adjacent properties and structures.</p> <p>(3) Screening and/or vegetation will be provided to the extent necessary to ensure aesthetic quality.</p> <p>(4) Design and construction materials shall be chosen so as to blend with the surrounding environment.</p> <p>(5) No additional harm to the aquatic environment will result from the project.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
450	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Commenter alterations to B. Buffer Widths</p> <p>3.B.</p> <p>Protection of Significant Trees within the Buffer. If buffer width averaging or reduction is utilized or buffers are otherwise reduced through a variance process and significant trees are identified on the outer edge of the reduced buffer such that their drip line extends beyond the buffer edge, the following tree protection requirements must be followed:</p> <p>1. A tree protection area shall be designed to protect each tree or tree stand during site development and construction. Tree protection areas may vary widely in shape, but must extend a minimum of 5 feet beyond the existing tree canopy area along the outer edge of the dripline of the tree(s), unless otherwise approved by the Department.</p> <p>2. Tree protection areas shall be added and clearly labeled on all applicable site development and construction drawings, submitted to the Department.</p> <p>3. Temporary construction fencing at least 30 inches tall shall be erected around the perimeter of the tree protection areas prior to the initiation of any clearing or grading. The fencing shall be posted with signage clearly identifying the tree protection area. The fencing shall remain in place through site development and construction.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
451	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to B. Buffer Widths 3.B. Protection of Significant Trees within the Buffer. If buffer width averaging or reduction is utilized or buffers are otherwise reduced through a variance process and significant trees are identified on the outer edge of the reduced buffer such that their drip line extends beyond the buffer edge, the following tree protection requirements must be followed: 4. No clearing, grading, filling or other development activities shall occur within the tree protection area, except where approved in advance by the Department and shown on the approved plans for the proposal. 5. No vehicles, construction materials, fuel, or other materials shall be placed in tree protection areas. Movement of any vehicles within tree protection areas shall be prohibited. 6. No nails, rope, cable, signs, or fencing shall be attached to any tree proposed for retention. 7. The Department may approve the use of alternate tree protection techniques if an equal or greater level of protection will be provided.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
452	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to C. Constrained Lot and Infill Provisions C.1.a. The Mitigation Options to Achieve No Net Loss for New or Re-Development Activities table (Appendix B) shall apply to such reductions. . Adjacent Development. The standard shoreline buffer/setback, as indicated in Table ____, for a vacant lot may be reduced when the vacant lot has a common property line with one or more lots that about the OHWM and that are developed with (a) single-family residence(s), provided: (1) The single-family residence(s) on the adjacent lot(s) is(are) built no more than 100 feet from the vacant lot, as measured from the property line to the building; and (2) The standard buffer/setback is reduced by no more than 25 percent, and the resulting buffer/setback is no less than the average setback of the adjacent residences. This reduction does not apply to an adjacent residence built with a reduced setback pursuant to a variance or other approval that reduced the standard setback or buffer.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
453	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to C. Constrained Lot and Infill Provisions C.1.b. b. Legally platted lots with a depth that would not allow for compliance with the Reduced Standard Buffer:. i. Legally platted lots with a depth that would not allow for compliance with the Reduced Standard Buffer. Proposals to reduce the buffer below the Reduced Standard Buffer shall require a Shoreline Mitigation Plan (Section 19.700.140), starting with review of existing conditions as presented in the Thurston County Shoreline Master Program Update Inventory and Characterization report and supplemented with appropriate field verification.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
454	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to D. Other Uses and Modifications in Buffers D.2 Hand removal or spot-spraying of invasive or noxious weeds is permitted within Vegetation Conservation Buffers. Give preference to projects that involve minimal or no supplemental applications of pesticides or herbicides. Pesticide or herbicide applicators shall be certified by EPA or the Department of Agriculture.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
455	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Commenter alterations to D. Other Uses and Modifications in Buffers New Addition Water Access Facilities Facilities waterward of the OHWM in marine waters shall consist of an open framework (e.g., pilings, grated surfaces, cable railings, floating facilities held in place with anchors) as opposed to solid surfaces with no openings, to the maximum extent feasible.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
456	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	145 Public Access	Change Requested	Commenter alterations to S. Project-specific public access standards Incorporate public education regarding shoreline ecological functions and processes, the role of human actions on the environment, and the importance of public involvement in shoreline management.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
457	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	Commenter alterations to introduction: Nonstructural measures include setbacks, wetland restoration, use relocation, bioengineered measures, biotechnical measures, and stormwater management programs. Structural measures include dikes, levees, revetments, floodwalls, channel realignment, and elevation of structures, consistent with the National Flood Insurance Program. Structural flood hazard reduction measures shall be avoided whenever possible. Additional relevant critical area provisions are in WAC 173-26-221(2).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
458	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	Commenter alterations to introduction: The intent of policies and regulations for the management of frequently flooded areas is to minimize public and private losses due to flood conditions in flood hazard areas. This section applies to actions taken to reduce flood damage or hazard and to uses, development, and shoreline modifications that may increase flood hazards. Flood hazard reduction measures may consist of nonstructural or structural measures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
459	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	Commenter alterations to introduction: Over the long term, the most effective means of flood hazard reduction is to prevent or remove development in flood-prone areas, to manage stormwater within the flood plain, and to maintain or restore river and stream system's natural hydrological and geomorphological processes (WAC 173-26-221). . Flood hazard reduction measures are most effective when integrated into comprehensive strategies that recognize the natural hydrogeological and biological processes of water bodies. Over the long term, the most effective means of flood hazard reduction is to prevent or remove development in flood-prone areas, to manage stormwater within the flood plain, and to maintain or restore river and stream system's natural hydrological and geomorphological processes (WAC 173-26-221).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
460	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	Commenter alterations to B. Development Standards: B.1. Impervious Surface Limits. Not more than one third of a residential development parcel within shoreline jurisdiction and landward of the ordinary high water mark shall be covered by effective impervious surfaces. New lots created in a Natural or Conservancy SED shall be limited to 10 percent effective impervious surfaces. The calculation for impervious surfaces shall include parking areas but may exclude a 12-foot-wide driveway. This restriction applies to both principal and accessory uses and structures. (From Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
461	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	Commenter alterations to B. Development Standards: B.8-9 8. New structural flood hazard reduction measures shall be: a. Permitted only in those circumstances in which nonstructural flood hazard reduction measures will not achieve the intended flood hazard reduction; and : b. Constructed and maintained in a manner that does not degrade water quality. 9. Groundwater movement and surface water runoff shall be considered in the design and operation of new structural flood hazard reduction measures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
462	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	155 Restoration and Enhancement	Change Requested	Commenter alterations to B. Development Standards: B.6-10 6. Restoration and enhancement projects shall achieve the goals and objectives of the Thurston County Shoreline Restoration Plan or in other recovery plans for listed species and/or populations, provided other such plans are consistent with achieving goals and objectives in the Thurston County Shoreline Restoration Plan. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
463	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	155 Restoration and Enhancement	Change Requested	Commenter alterations to B. Development Standards: B.6-10 7.Restoration and enhancement completed in advance of shoreline development may be used for future development-related mitigation purposes when: a. The restoration and enhancement is either: (1) Demonstrably related to the impacts of the proposed development (i.e., in-kind); or (2) Not demonstrably related to the impacts of the proposed development (i.e., out-of-kind), provided the restoration and enhancement will result in greater levels of ecological shoreline processes or functions than would in-kind restoration and enhancement; and	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
464	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	155 Restoration and Enhancement	Change Requested	Commenter alterations to B. Development Standards: B.6-10 7.Restoration and enhancement completed in advance of shoreline development may be used for future development-related mitigation purposes when: b. Initiated after March 1, 2005, the implementation date of the Critical Area regulations update; c. Pre-restoration and pre-enhancement ecological shoreline processes or functions can be conclusively demonstrated; and d. Protective measures are applied to the restored and enhanced area in the form of a tract, conservation easement, or similar preservation mechanism approved by the County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
465	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	155 Restoration and Enhancement	Change Requested	Commenter alterations to B. Development Standards: B.6-10 8. Shoreline restoration projects that meet RCW 90.58.580 may be granted relief from Master Program development standards and use regulations within urban growth areas. 9. Restoration and enhancement designed to improve fish habitat, and meeting the requirements of RCW 77.55.181, may qualify for an expedited review process with no local government fees.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
466	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	155 Restoration and Enhancement	Change Requested	Commenter alterations to B. Development Standards: B.6-10 10. Encourage aquaculture activities proposed solely for purposes of shoreline restoration and enhancement. (from Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
467	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements Introduction: This Section applies to the culture or farming of fish, shellfish, or other aquatic plants and animals. This Section does not apply to the harvest of wildstock geoduck associated with state managed wildstock geoduck fishery. Aquaculture activities shall not substantially and materially conflict with areas devoted to legally established water-dependent uses of the aquatic environment. Such uses include, but are not limited to navigation, moorage, recreation, sport or commercial fishing, underwater utilities, and scientific research. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
468	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements A.1 The following four factors are considered a new use/development, and shall require a new aquaculture permit and compliance with this SMP: a. Introduction of a new shellfish species, b. changing the shellfish species cultivated, c. expansion of the physical area cultivated, or d. relocation of the aquaculture operation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
469	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements A.1 Aquaculture involving a diversity of species is preferred over monoculture plantings. Aquaculture that results in adverse impacts resulting in the following: no net loss of ecological functions or native eelgrass or microalgae, or that conflict with navigation or other water-dependent uses, are not preferred uses. New aquatic species that have not been previously cultivated in Washington State shall not be introduced into the County without prior written approval of the Director of the Washington Department of Fish and Wildlife and the Director of the Washington Department of Health.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
470	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements A.1 With the exception of Olympia Oyster propagation which is a conditional use, new commercial shellfish aquaculture operations are prohibited within the Nisqually Reach Aquatic Reserve. Introduction of a new finfish species, changing the finfish species cultivated, expansion of the physical area cultivated or relocation of the finfish aquaculture operation is considered a new use/development, and shall require a new permit and compliance with this SMP. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
471	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements Introduction Consider both the potential beneficial impacts and the potential adverse impacts that aquaculture might have on the physical environment, other existing and approved land and water uses, and on the aesthetic qualities of a project area	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
472	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 1.F. Design, locate, and operate aquaculture activities in a manner that supports long- term beneficial use of the shoreline and protects and maintains shoreline ecological functions and processes. Design and locate aquaculture facilities so as not to: a. spread disease to native aquatic life b. establish new non-native species that cause significant ecological impacts, or c. significantly impact the aesthetic qualities of the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
473	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 1.F. The County should ban the establishment of new non-native species. Aquaculture should not be sited in locations where it would: a. Result in a net loss of shoreline ecological functions; b. Adversely affect the quality or extent of habitat for Federal and State listed species and species of local importance, including eelgrass, kelp, and other macroalgae; or c. Adversely impact other habitat conservation areas or connectivity between such areas; or significantly interfere with navigation or other water-dependent uses.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
474	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 1.F. The County shall separate individual aquaculture uses and developments by a sufficient distance to ensure significant adverse cumulative effects do not occur. Aquaculture activity boundaries shall be illustrated on a site plan that includes a depiction of the real property boundaries consistent with the legal description of the property. Aquaculture activity boundaries and property corners shall be staked according to Chapter 58.17 RCW and Chapter 332-130 WAC.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
475	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 1.F. Aquaculture activity area boundaries shall be identified through the life of the aquaculture operation. Markers are to be visible when the tidelands are exposed. Projects that utilize submerged structures and/or tubes, stakes, racks, or bags, shall also provide floating markers to identify the boundary at higher tides. All markers shall provide the applicant's contact information and a description of aquaculture activities and any associated navigation hazards. Markers in navigable waters shall conform to any applicable U.S. Coast Guard requirements. Floating markers may be removed when the submerged structures and equipment are removed. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
476	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 1.F. Aquaculture activities shall not be located within tidal channel portions of streams and rivers with direct utilization by anadromous species.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
477	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	2.K. Aquaculture development in shorelines shall not significantly or cumulatively increase pollution, erosion, or siltation. The County shall require an analysis of cumulative impacts in advance of proposed aquaculture activities for more complex projects including, but not limited to: a. operations on shorelines of statewide significance; b. multi-species operations and/or farms; c. operations and/or farms proposed within enclosed waters; d. operations and/or farms proposed in locations where similar farms exist or are proposed; or e. operations and/or farms that would be the first of their kind in the area. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
478	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 2.K. Removal of embedded natural rocks and natural woody debris: (Rose, L.A. 2015) a. Maintain habitat structural integrity by designing grow-out site around existing embedded natural rocks and natural woody debris. b. Safely relocate existing embedded natural rocks and natural woody debris to adjacent plot outside the grow-out bed and enhance with additional natural materials to mitigate loss of habitat structure. c. Select alternate site that lacks habitat structure, embedded natural rocks and/or natural woody debris.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
479	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 2.K. Removal, purging or relocation of individual native animal life (native shellfish, crabs, sea stars, shellfish, moon snails, sand dollars, etc. (Rose, L.A. 2015) a . Do not remove, purge or relocate any species of individual native animal life, including native shellfish, crabs, sea stars, moon snails, sand dollars. b. Locate industrial geoduck beds away from sand dollar beds and native shellfish beds and separate with at least a 185-foot buffer to protect native animal life from impacts due to aquaculture activities.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
480	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 2.K. Clearing native aquatic vegetation: (Rose, L.A. 2015) a. Native aquatic vegetation shall not be cleared or thinned out. b. Employ 185-foot buffers around all native aquatic vegetation beds to protect both native aquatic vegetation and fish, marine mammals, birds and other native animal life that depend on the beds for one or more of their life histories.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
481	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 3.F. Clearing native aquatic vegetation: (Rose, L.A. 2015) c. Prevent all entry including barges and equipment into the native aquatic vegetation beds and buffers during all site work. d. Monitor vegetation density and bed size prior to any site work through to harvest plus one post-harvest growing period.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
482	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to B. Application Requirements 3.i. Give preference to projects that involve no supplemental food sources, pesticides, herbicides, or antibiotic applications. Shellfish aquaculture projects shall not involve the use of supplemental feed, pesticides, herbicides, antibiotic, vaccines, growth stimulants, antifouling agents, or other chemicals. When such products are used for finfish aquaculture, usage data shall be maintained by the applicant/operator and shall be provided to the County upon request. Finfish aquaculture that uses or releases herbicides, pesticides, fertilizers, pharmaceuticals, non-indigenous species, parasites, viruses, genetically modified organisms, feed, or other materials know to be harmful into surrounding waters shall not be allowed unless significant impacts to surrounding habitat and conflicts with adjacent uses are effectively mitigated. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
483	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 1 Standards. DEFINITION: Judge Bjorgen, in his 2011 rules, defines as “structures:” geoduck aquaculture PVC pipes, which cover 43,000 per acre, totally approximately 7 miles and 16 tons of PVC. (Pierce Co): Aquaculture is prohibited adjacent to residential hoods in bays and inlets in South Puget Sound and adjacent to such islands due to water quality issues, and visual impacts. Aquaculture operations are subject to all applicable State approved management guidelines. Where such guidelines are less restrictive than the County requirements, the County's requirements shall apply. Applications for aquaculture shall be subject to the Aquaculture Application Requirements of TCC – Appendix C.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
484	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 1.b Aquaculture activities allowed pursuant to an approved Shoreline Conditional Use Permit shall not be subject to review of a new Shoreline Conditional Use Permit for subsequent cycles of planting and harvest unless specified in the original Shoreline Conditional Use Permit.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
485	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 1.c The overarching focus for aquaculture practices shall be avoidance or minimization of negative impacts as set forth in TCC__. The County shall establish monitoring procedures to ensure aquaculture operations are in compliance with permit conditions. Aquaculture is prohibited in Estuaries within 300 feet of the mouth of freshwater streams (measured at extreme low tide). (Pierce Co) Commercial aquaculture must conform to Regulated Uses and Activities of Critical Areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
486	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 1.f Aquaculture activities shall be set back a minimum of 10 feet from adjacent parcels not associated with the aquaculture activity, in accordance with WAC 365-190-130. Expanded setbacks shall be based on water body and shoreline characteristics and an analysis of legally established shoreline development. The 10-foot setback requirement shall be increased: a. when the shoreline contains multiple individual aquaculture activity areas, and/or b. when plans proposed by aquaculture demonstrate that a greater distance is needed between areas or adjacent parcels. Setback distances ensure maintenance of other shoreline uses, such as recreation or public access, or to ensure protection of shoreline functions and processes. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
487	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 1.l All equipment and structures and/or tubes, nets, and bands, shall be marked to identify ownership, and shall be removed as defined by a County approved schedule. Proposals shall demonstrate methods to be used to secure tubes, nets, bands and other equipment and structures so they will not escape from the site during the life of the operation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
488	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 1.m Aquaculture proposals that have the potential to result in significant adverse environmental impacts, as demonstrated through a scientific analysis, shall be prohibited. Operators shall regularly patrol for aquaculture-related materials and debris. The distance to be patrolled will be based on site attributes, such as drift cell (sections of coastline with littoral drift, a sediment source, a zone of sediment transport and sediment deposition (Parks et al) that causes accretion shore forms), patterns and degree of enclosure, adjacent land use patterns. Operators must contact landowners to legally gain access to adjacent properties. The operator of any aquaculture activity shall provide contact information to abutting waterfront property owners and shall, in a timely manner, respond to and rectify any complaint relating to materials, equipment, or operation activities. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
489	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards n.vi Anti-Predator Nets: (Rose, L.A. 2015) a. Do not deploy site-wide canopy net. b. Avoid use of PVC tubes and plastic nets. Use PHA tubes and juke netting. Microplastics: Marine pollution: (Rose, L.A. 2015) . Plastics in canopy nets or tubes in the planting site shall not be permitted. The use of new plastic and polyethylene netting in commercial aquaculture is prohibited and current uses are to be phased out by 2025. (U.S. cities and companies are approving plastic bans in 2018.) AVS Predator exclusion - to mitigate for site impacts and prevent net loss of functions and processes: (Rose, L.A. 2015) a. Use an alternative to PVC pipe, such as PHA (a biodegradable plastic) for tubes or pipe. b. When permitted, PVC pipe must be in excellent condition and must be removed within two years to minimize the discharge of microplastics into the marine environment.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
490	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards n.vi c. Reduce amount of PVC pipe placed onto planting site by increasing the distance between pipes. [currently averaging approximately 8 miles per acre] d. Prior to design of planting site, make site-specific assessment of impacts on community structures. e. Prohibit use of PVC pipe within public or residential view corridors such as public parks or public access points. f. PVC pipe is heavier than water. Provide an inventory of PVC tubes on-site. g. Divers must search the nearshore within one half mile of site to recover lost tubes/pipes. h. Beach cleanup must occur frequently within one half mile of planting site if/when permitted by neighbors. i. Fines for missing inventory are imposed in TCC__. . Predator control shall not involve deliberate killing or harassment of birds, invertebrates, or mammals. Predator control equipment shall be removed as defined within the approved schedule, but no longer than two years after installation. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
491	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 2.e Proposals shall minimize adverse impacts from noise, light, and glare on nearby properties to the extent feasible. To the degree practicable, materials and colors that blend into their surroundings shall be utilized. Permanent lighting shall not be permitted except as required for navigation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
492	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards 3 introduction New finfish aquaculture involving net pens for anadromous species shall be prohibited throughout Thurston County marine waters. Finfish aquaculture involving net pens for anadromous species are prohibited in all marine waters of Thurston County where aquatic reserve areas are located.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
493	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter alterations to C. Development Standards New section after 3 Harvest and Processing (From Pierce Co) Harvest activities shall be conducted in a manner that minimizes turbidity and the risk of impacts to aquatic vegetation and the intertidal bed. Harvest activities within fine-grained beaches susceptible to sediment transport may be required to utilize sediment containment methods such as sediment control fencing, hose line, or cloth tubes. Water pumps should be placed on floating rafts or boats that shall not come in direct contact with the substrate. Pump intakes shall be screened to minimize the capture of marine organisms. Harvesting during low tides may occur at night or on weekends only if low tide harvesting is necessary.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
494	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	New section after 3 Harvest and Processing (From Pierce Co) Processing and processing facilities should be located on land and shall be subject to TCC__, Commercial and Industrial Policies and Regulations, and Thurston County Health Department – Environmental Health Division Regulations, and applicable County Codes, in addition to the policies and regulations in this Section. No garbage, waste, or debris shall be allowed to accumulate at the site of any aquaculture operation. If significant mortality of species under cultivation occurs, the aquaculture operator shall immediately report the event to the State and local Health Departments, and then the County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
495	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	New section after 3 Harvest and Processing (From Pierce Co) At two years, a geoduck aquaculture site shall remove all PVC tubes and netting from an aquaculture site. To mitigate for site impacts during harvest: (Rose, L.A. 2015) a. Hand harvest geoducks. b. Minimize total suspended solids/turbidity contribution to water column. To largely infiltrate water, maintain separation from water injection sites to the tide line by allowing sufficient distance for runoff from stinger.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
496	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	120 Barrier Structures and In-stream Structures	Change Requested	3. (From Pierce Co): The installation of aquaculture structures and/or equipment shall demonstrate the following: a. The structures and/or equipment proposed are the minimum necessary for feasible aquaculture operations; b. The design and location of such structures and/or equipment does not effectively preclude surface navigation, recreational boating, and other public use of shoreline waters; and	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
497	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	120 Barrier Structures and In-stream Structures	Change Requested	3. (From Pierce Co): c. Safe and unobstructed passage is provided for fish and wildlife. Over-water structures and/or equipment, and any items stored upon such structures such as materials, garbage, tools, apparatus, shall be designed and maintained to minimize visual impacts. The maximum height above water for developed structures shall be limited to three feet unless shoreline conditions serve to minimize visual impacts (for example: high bank environments, shorelines without residential development). Height limitations do not apply to materials and apparatus removed from the site on a daily basis. References: Pierce County. PCC-2016_Pierce_County_SMP_As_Submitted. Rose, L.A. 2015. Best Management Practices, Geoduck Aquaculture. Version 5, Revised Sept 16, 2015 Feldman, K. et.al. 2004. COMPREHENSIVE LITERATURE REVIEW AND SYNOPSIS OF ISSUES RELATING TO GEODUCK (PANOPEA ABRUPTA) ECOLOGY AND AQUACULTURE PRODUCTION. Prepared for Washington State Department of Natural Resources. 134 pp.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
498	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	140 Fill	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1&2: 1. Natural SED: Prohibited, except for restoration purposes as noted below; 2. Mining, Shoreline Residential SED, Urban Conservancy SED, Rural Conservancy SED; a. CUP for fill waterward of the OHWM for any use except ecological restoration. b. SDP for fill landward of the OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
499	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modification_Development_Standards_600	145 Forest Practices/Timber Harvest	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1-3: 1. Natural SED: CUP 2. Rural Conservancy SED: SDP 3. Urban Conservancy SED, Shoreline Residential SED, Mining:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
500	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	150 Industrial Development	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1,2,4: 1. Natural and Rural Conservancy SEDs: Prohibited 2. Urban Conservancy SED and Shoreline Residential SED: CUP for water-oriented industries. Non-water-oriented industrial development shall be prohibited. 4. Aquatic SED: Prohibited, unless water-dependent or allowed in the adjoining upland designation, then a CUP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
501	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	155 Mining	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1-5: 1. Natural SED: Prohibited 2. Rural Conservancy SED: CUP 3. Urban Conservancy SED and Shoreline Residential SED: Prohibited 4. -Mining: CUP- No longer a designation! 5. Aquatic SED: Prohibited	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
502	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	170 Residential Development	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1-4: 1. Natural SED: a. CUP for primary single-family residences and subdivisions. b. Prohibited for multi-family units and accessory dwelling units. 2. Rural Conservancy and Urban Conservancy SEDs: a. SDP if exemption criteria not met. b. CUP for multi-family units, accessory dwelling units and subdivisions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
503	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	170 Residential Development	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1-4: 3. Shoreline Residential SED: a. SDP if exemption criteria not met. b. SDP for multi-family units, accessory dwelling units, and subdivisions. 4. Aquatic SED and Mining: Prohibited	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
504	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	180 Transportation	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1-3: 1. Natural SED: Prohibited, except to serve essential transportation corridors or in support of permitted uses and activities, and then with a CUP. 2. Rural Conservancy SED, Mining, and Urban Conservancy SED: CUP 3. -Shoreline- Residential SED: SDP	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
505	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	185 Utilities	Change Requested	Commenter alterations to A. Environment Designations Permit Requirements 1-3: 1. Natural SED: Prohibited, except to serve essential utility corridors or in support of permitted uses and activities, and then with a CUP. 2. Rural Conservancy SED, Urban Conservancy SED, Shoreline Residential SED, Mining: SDP. 3. Aquatic SED: CUP	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
506	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	185 Utilities	Change Requested	Commenter alterations to C. Development Standards 1.i.1-5 1. Utilities should be underground, including underneath water bodies, unless such location would cause greater degradation to ecological functions or be technically prohibitive. 2. Parks, scenic views, and historic, archaeological and cultural resources shall be avoided unless no feasible alternative exists. 3. After construction, the work site shall be restored to the maximum extent possible. 4.Any mitigation required shall be maintained for the life of the project. 5. Applicants shall demonstrate the need for a shoreline location, and if the utility is proposed outside of an existing right-of-way, why collocation within existing right- of-way is not feasible. (Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
507	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	185 Utilities	Change Requested	Commenter alterations to C. Development Standards 2.d. . New solid waste disposal or transfer facilities are prohibited in shoreline areas, except water-dependent solid waste transfer facilities may be allowed in port or industrial areas if they include a modern transfer system where all waste is either delivered to the site already containerized or waste is transferred to containers inside of an enclosed building.(Pierce Co)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
508	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	105 Wetland Delineation Report	Change Requested	Introduction At a minimum, the following Wetland Delineation Report contents are required:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
509	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	105 Wetland Delineation Report	Change Requested	4. Wetland rating or categorization. Wetlands shall be categorized based on the rarity, irreplaceability, or sensitivity to disturbance of a wetland and the functions the wetland provides. Local governments should either use the Washington state wetland rating system, Eastern or Western Washington version as appropriate, or they should develop their own, regionally specific, scientifically based method for categorizing wetlands. Wetlands should be categorized to reflect differences in wetland quality and function in order to tailor protection standards appropriately. A wetland categorization method is not a substitute for a function assessment method, where detailed information on wetland functions is needed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
510	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	Introduction A. Delete: This report shall identify how development impacts to fish and wildlife habitat from a proposed project will be mitigated.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
511	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	C.3. 1. HMP reports submitted under the requirements of this Chapter shall, at a minimum, include the following: a. The parcel number of the subject property. b. The site address of the subject property, if one has been assigned by the County. c. The date and time the site evaluation was conducted and the date the habitat assessment was prepared.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
512	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	C.3. 1. HMP reports submitted under the requirements of this Chapter shall, at a minimum, include the following: d. The credentials of the fish or wildlife biologist who prepared the habitat assessment. e. The mailing address and phone number of the property owner and the fish or wildlife biologist who prepared the habitat assessment. f. A detailed description of the vegetation on and adjacent to the site.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
513	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	C.3. 1. HMP reports submitted under the requirements of this Chapter shall, at a minimum, include the following: g. Identification and description of critical fish or wildlife species or habitats on or adjacent to the site, and the distance of such habitats or species in relation to the site. Describe efforts used to determine the status of critical species in the project area, including information on survey methods, timing, and results of surveys for species or suitable habitat identification.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
514	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	C.3. 1. HMP reports submitted under the requirements of this Chapter shall, at a minimum, include the following: h. Information received from biologists with special expertise on the species or habitat type, such as WDFW, Tribal, USFS, or other local, regional, federal, and university fish, wildlife and habitat biologists and plant ecologists. Include any such conversations in the habitat assessment and cite as personal communication. i. The Department may require the applicant to request a separate evaluation of the site by WDFW staff to confirm the findings of the habitat assessment.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
515	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	D.General . Mitigation measures include the following: timing restrictions, clearing limitations; avoidance of specific areas; special construction techniques; COHP (Conversion Option Harvest Plan) conditions; HPA conditions; planting with native vegetation; habitat enhancement (i.e., fish passage barrier removal); best management practices. If applicable, append a copy of the HPA, specifications for BMPs, or other documentation to support the implementation of the conservation measure.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
516	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	D.General . Mitigation shall address each functional attribute affected by the alteration to achieve functional equivalency or improvement on a per function basis. . Mitigation elements to be addressed may include, but are not limited to: restoration of previously degraded areas and key habitat features, restoration of riparian vegetation communities to provide shade and large woody debris, addition of large woody debris, and installation of upland habitat features.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
517	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	<p>D.General</p> <p>. Mitigation measures include the following: timing restrictions, clearing limitations...</p> <p>. Where aquatic habitat mitigation is appropriate, the following shall apply:</p> <p>a. Mitigation shall be provided on-site, except where:</p> <p>i) the applicant demonstrates that on- site mitigation is not scientifically feasible or practical due to physical features of the site , or</p> <p>ii) it can be demonstrated that greater functional and habitat values can be achieved through offsite mitigation.</p> <p>. When mitigation cannot be provided on-site, it shall be provided in the immediate vicinity of, and within the same watershed as, the regulated activity.</p> <p>. Purchase of credits from an in-lieu fee mitigation program (ILF program) or wetland mitigation bank may be allowed when demonstrated to adequately compensate for project-specific impacts.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
518	13-May-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AI_Special_Reports_700	120 Geotechnical Report and Geological Report	Change Requested	<p>D.1.c.</p> <p>The enhancement plan shall use native plant species indigenous to the project area and shall substantiate that an enhanced habitat area and/or buffer will improve the functional attributes of the affected area to provide additional protection for critical fish or wildlife habitat, wetlands, landslide hazard areas, or adjacent properties that may be affected by the proposal.</p> <p>.The enhancement plan shall include detailed information on the following:</p> <p>a. Type of species proposed.</p> <p>b. Exact location of proposed enhancement area.</p> <p>c. Timing and schedule of planting.</p> <p>d. Schedule for monitoring and maintenance and any financial guarantees for these as required in TCC__.</p> <p>e. Name, address, and telephone number of the person(s) responsible for the enhancement project.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
519	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Commenter alterations to Introduction</p> <p>The Shoreline Management Act of 1971 (the Act) expresses a preference for appropriate development that requires a shoreline location, protection of shoreline environmental resources, and protection of the public’s right to access and use of shorelines (RCW 90.58. 020). Three interrelated policy areas of the act of include: 1) shoreline use, 2) environmental protection, and 3) public access.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
520	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Commenter alterations/suggestions to Introduction</p> <p>The SMA (the act) requires that "uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon use of the state's shorelines..."</p> <p>To the maximum extent possible, reserve the shorelines for water-oriented uses, including water-dependent, water- related, and water-enjoyment uses.</p> <p>Protect ecological functions, and aquatic and terrestrial life, associated with shorelines.</p> <p>“No Net Loss” - The public and environmental organizations have a right to complete clarity on the concept, especially when they are funding restoration projects with the idea of “improving and restoring” Puget Sound. The County must be “up-front” about the facts of “No Net Loss” so individuals and groups who willingly give funds for Puget Sound restoration projects are not misled and are made aware of the fact that they are not donating to improve Puget Sound, but to maintain the status quo for someone else’s financial or personal benefit.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
521	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Commenter alterations/suggestions to Introduction</p> <p>Direct the county to integrate ecological functions and aquatic and terrestrial life into all considerations for development in shorelines.</p> <p>The SMA must not allow new land alterations and development that results in a net loss to ecological functions. The county must encourage net gains in both programmatic (planning-level decisions) and project (site-specific design detail) bases, when conducting mitigation sequencing.</p> <p>Require compensatory mitigation to occur in the same or related habitat areas to allow for gain in the same ecological functions and ecosystem-wide processes.</p> <p>Tell the county to replace the special interest group representing shellfish protection districts on the Shoreline Master Program Regulatory Group with a county staff person who manages the county Shellfish Protection District plan or program.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
522	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Commenter alterations/suggestions to Introduction</p> <p>We request the county reverse the decision to cancel the SMP Regulatory and review groups, reconvene the groups according to original timetable, and continue to engage in a public process that will yield a SMP that the involved parties can support. These two groups give the public and agencies a chance to comment on, and discuss, a refined draft SMP Update before it is sent to the Thurston County Planning Commission for its process. Changing the timetable will only create more public dissent over the issues into the future, further delaying the process. We believe that maintaining these groups will save the county money into the future, with a plan based on the public trust.</p> <p>We request Thurston County Community Planning and Economic Development (CPED) write a letter to the state (Commerce?) regarding its shoreline planning process, demonstrating good faith, to be considered in compliance (work with other counties who are also out of compliance) and extend its date, so the county can continue on the original timetable.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
523	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Commenter alterations/suggestions to Introduction</p> <p>The county must add to definition 19.150.170 Best Management Practices: A BMP may be an activity, a maintenance procedure, a physical or structural device, or a management practice used to prevent or reduce the release of pollutants to stormwater.</p> <p>Tell county to ensure all proposed uses and development in a shoreline jurisdiction (shoreline environment designation) conform to the SMA (RCW 90.58), the county Master Program, and Thurston County Code (TCC), whether or not a permit is required.</p> <p>When a site contains more than one regulated critical area, developers must apply standards and requirements for each critical area’s feature.</p> <p>Protecting the shoreline environment is an essential statewide policy goal. The no net loss standard is designed to halt the introduction of new impacts to shoreline ecological functions resulting from new development. Both protection and restoration are needed to achieve no net loss [from ECY Handbook].</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
524	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AB_Introduction_100	110 Purpose	Change Requested	Commenter alterations/suggestions to Introduction The county shall prevent impairment of shoreline ecological functions and processes by permitted and/or exempt actions taken prior to, or after, the Act’s adoption, and/or unregulated activities. Here are ways the county can do this: • Develop a process that identifies, inventories, and ensures meaningful understanding of current and potential ecological functions and processes provided by shorelines and freshwater, marine and estuarine environments, and documents a baseline procedure of current functions performed by an independent consultant.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
525	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AC_Definitions_150	General Feedback / No Specific Section	Change Requested	Commenter alterations to Introduction: Do not allow predator wildlife control to deliberately kill or harass birds, invertebrates, or mammals. Remove predator control equipment no longer than two years after installation. Re: Definition: Change the term “Predator Exclusion” to “Wildlife Exclusion.” “Predator Exclusion” is shellfish industry concept. “Predator exclusion” is an environmentally disruptive process of excluding native wildlife from certain aquaculture installations. Such an industry definition has no place in a governmental regulation that is specifically designed to protect and preserve natural ecological conditions. It should also be noted that “predator exclusion” almost certainly includes endangered, sensitive, and/or threatened species.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
526	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AC_Definitions_150	General Feedback / No Specific Section	Change Requested	Commenter alterations to Introduction: The use of language including “Predator Exclusion” is a way of normalizing concepts that are abnormal and favor the viewpoint of a specific industry rather than the citizens of Thurston County. Are we to take our children down to the beach and see starfish and crabs and explain to them that they are “bad” because they are predators of the commercially grown geoduck? Enshrining this in county documents is unacceptable and counter-productive.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
527	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AC_Definitions_150	General Feedback / No Specific Section	Change Requested	Commenter alterations to Introduction: Add: Low-impact development (LID) is a term describing a land planning, and engineering design approach, to manage stormwater runoff as part of green infrastructure. LID emphasizes conservation and use of on-site natural features to protect water quality.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
528	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AC_Definitions_150	General Feedback / No Specific Section	Change Requested	Commenter alterations to Introduction: Add: Sustainability is the property of biological systems to remain diverse and productive indefinitely, so environmental functions and processes can endure. Long-lived and healthy wetlands and forests are examples of sustainable biological systems.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
529	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Residential Shoreline Environment Designation (SED) Design development to preserve and enhance the visual quality of the shoreline, including views over and through the development from the upland side, and views of the development from the water. Priority should be given to residential and water-oriented commercial development where such development can be accommodated with no net loss of shoreline ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
530	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Residential Shoreline Environment Designation (SED) Preferred Uses are those which are consistent with control of pollution and prevention of damage to the natural environment. [Where I have used Vulnerable: WDFW uses the word sensitive instead of vulnerable. ITIS, the national database, uses vulnerable.] Design and locate new development to preclude the need for shoreline armoring, vegetation removal, flood control, and other shoreline modifications.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
531	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Primary uses allowed in Residential and Urban Conservancy SEDs must be uses that preserve, or restore for a gain in ecological functions, the natural character of the shoreline area, critical areas, floodplain, or other sensitive or vulnerable marine, estuarine, or freshwater fish and wildlife habitats, or promote preservation of open space, either directly or over the long term.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
532	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	120 Urban Conservancy	Change Requested	19.200.120 Urban Conservancy Shoreline Environment Designation (SED) Primary uses allowed in Residential and Urban Conservancy SEDs must be uses that preserve, or restore for a gain in ecological functions, the natural character of the shoreline area, critical areas, floodplain, or other sensitive or vulnerable marine, estuarine, or freshwater fish and wildlife habitats, or promote preservation of open space, either directly or over the long term.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
533	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	120 Urban Conservancy	Change Requested	19.200.125 Rural Conservancy Shoreline Environment Designation (SED) Change the Purpose to: To protect ecological functions, conserve existing natural resources and valuable historic and cultural areas to provide for sustainable resource use, achieve natural floodplain processes, and provide recreational opportunities. Support lesser-intensity resource-based uses, such as agriculture, aquaculture, forestry, or recreational uses, or are designated agriculture or forest lands; Expansion of a once less-intense use to that of a higher intensity may remove that use from the SED. The highly concentrated growth of the geoduck aquaculture industry does not qualify it as a low or lesser intensity industry. Scientific studies have found the average natural density of a Puget Sound geoduck bed is 2.1 geoducks/m2 (.195 geoducks/ft2) or 8,494 geoducks/acre. Industrial aquaculture currently grows geoducks at a rate of 1 geoduck/ft2, or 43,560 geoducks/acre (and PVC tube and netting structures) - over a 5-fold increase!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
534	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	120 Urban Conservancy	Other	19.200.125 Rural Conservancy Shoreline Environment Designation (SED) A 500% increase in the number of geoducks the acre may be able to sustain without environmental degradation, all placed on local marine, nearshore, and estuarine ecosystems. At three geoduck seeds planted per tube, that percentage could be at least doubled. At four years in one location, geoduck aquaculture is not a non-permanent use. Since the County is issuing permits with no term of lease, when the harvest occurs, the tideland in use will go through the same cycle for an indefinite period of time, making commercial/industrial geoduck aquaculture a “permanent” event!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
535	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Change Requested	19.200.130 Natural Shoreline Environment Designation (SED) B. Designation Criteria. Shorelines having a unique asset or feature considered valuable for its natural or original condition that is relatively intolerant of intensive human use. This includes shorelines both in and out of the UGA or LAMIRD urban growth area (UGA) or limited area of more intensive rural development (LAMIRD) when any of the following characteristics apply: ... add 7.: 7. The shoreline has spawning or migrating endangered, threatened, sensitive, vulnerable, or otherwise protected (forage fish), species.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
536	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Change Requested	19.200.130 Natural Shoreline Environment Designation (SED) Prohibit commercial, industrial (includes aquaculture) and non-water-oriented recreation. Prohibit any use that would degrade ecological functions, natural features, and overall character of the shoreline area. Allow single-family residential development only if the density and intensity of the use is limited to protect ecological functions and is consistent with the intent of the natural shoreline environment. Develop new land divisions consistent with Low Impact Development (LID) techniques. Facilitate private and public enjoyment through low-intensity development such as passive, recreational, scientific, historical, cultural, and educational uses, provided that no net loss in ecological function and processes will result. Limit low intensity agricultural and forestry uses to ensure the intensity remains low.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
537	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Change Requested	19.200.130 Natural Shoreline Environment Designation (SED) Do not permit commercial, industrial, multi-family residential, or non water-oriented recreation uses. Do not permit new development or vegetation removal that would reduce ecological functions or processes. Allow scientific, historical, cultural, educational research uses, and low-intensity water- oriented recreational access uses, provided that no significant ecological impact on the area will result. Prohibit industrial or commercial water-dependent uses, or their expansion, in estuaries and along Natural shorelines. Require compensatory mitigation to occur in related habitat areas to allow for gain in same ecological functions and ecosystem-wide processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
538	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Change Requested	19.200.135 Aquatic Shoreline Environment Designation (SED) Use this Purpose: To protect, restore, and manage the quality and health of marine and fresh waters and the species that depend upon these ecosystems, while allowing for limited modification for water-dependent uses and public access, when located in appropriate areas waterward of the ordinary high-water mark (OHWM) and developed to avoid a net loss of shoreline functions. Allow overwater linear public transportation and utility facilities when it is the most technically, economically, and environmentally, feasible option. Primary allowed uses must be uses that preserve the natural character of the area or promote preservation of open space, floodplain or other sensitive lands either directly or over the long term.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
539	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Change Requested	19.200.135 Aquatic Shoreline Environment Designation (SED) Locate and design all development on navigable waters and submerged lands to reduce impacts to public views and allow for the safe, unobstructed passage of fish and wildlife, particularly those species dependent on migration. Do not permit development that adversely impacts the ecological functions of marine, estuarine, and freshwater habitats; except where necessary to achieve the objectives of the SMA (RCW 90.58.020) (“Use” Preferences), and then, when impacts are mitigated to assure maintenance of shoreline ecological functions and processes. (“Use” Preferences: (1) Recognize and protect the statewide interest over local interest; (2) Preserve the natural character of the shoreline; (3) Result in long term over short term benefit; (4) Protect the resources and ecology of the shoreline; (5) Increase public access to publicly owned areas of the shorelines; (6) Increase recreational opportunities for the public in the shoreline; (7) Provide for any other element...or as deemed appropriate or necessary.)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
540	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Change Requested	19.200.135 Aquatic Shoreline Environment Designation (SED) Design and manage shoreline development and modifications to prevent degradation of water quality and alteration of natural hydrographic conditions. Require compensatory mitigation to be located in same/related habitat areas to allow for gain in same ecological functions and ecosystem-wide processes. Establish buffers large enough, and/or necessary to, protect critical areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
541	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	19.300.110 Vegetation Conservation Develop a County administrative vegetation management manual with minimum requirements for Planting Plans.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
542	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	General Feedback / No Specific Section	Other	General Notes: No net loss is necessary to sustain a shoreline’s overall marine, estuarine, and freshwater aquatic environments. Environmental management of shoreline aquatic systems is critical for the health and safety of the public. The intention of the SMP is to protect the functions shoreline vegetation provides. Shoreline buffers provide many benefits for water bodies, including protecting habitat and water quality. The SMP guidelines (WAC 173-26-186(8)) provide development standards to guide local governments when implementing shoreline management under the Shoreline Management Act of 1971 (RCW 90.58) (SMA). The guidelines use regulations designed to achieve no net loss of shoreline ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
543	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	General Feedback / No Specific Section	Other	General Notes: We ask commissioners to recognize and protect the statewide interest over the local interest, resulting in long term over short term benefit. In doing so, permits that adversely impact ecological functions of marine, estuarine, and freshwater habitats must not be allowed. Permits must only be given to achieve the objectives of the SMA (RCW 90.58.020) (“Use” Preferences). Developers must mitigate their impacts to assure shoreline ecological functions are maintained. Use preferences include preserving the natural character of the shoreline, while protecting the resources and ecology of the shoreline. The county must incorporate public education regarding shoreline ecological functions and processes, the role of human actions on the environment, and the importance of public involvement in shoreline management.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
544	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1. General Mitigation Standards Encourage county planners to enhance urban and city development with open spaces and vegetation buffers and corridors when considering mitigation planning for properties. Both open spaces and buffers have significant effects on, and importance concerning, sustainability of environmental functions over time. Buffers and open spaces lessen the impacts of human activity, development and land disturbance, such as stormwater and other water quality and quantity impacts. Green spaces can improve urban climate, abate the urban heat-island effect, and reduce environmental damages. Vegetation stabilizes streambanks and improves water quality. Poll after poll show support for open spaces with trees, shrubs, and other vegetation by residents in neighborhoods world-wide. Mitigation for development projects alone will not minimize adverse cumulative impacts to the shoreline environment, so restoration with a net gain in environmental functions is also required. Please assure that shoreline modifications, such as filling, dredging, or flood-control do not result, individually or cumulatively, in a net loss of ecological functions. The first, and most important step in the Mitigation Sequence, avoidance, is ignored more often than it is implemented. Climate change is creating considerable threats to wetlands globally.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes.	Pending / Item for Discussion
545	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1. General Mitigation Standards Permit Review Process, Tracking The success of this SMP will depend on improved mitigation in the permitting process. Improvements include more effectively quantifying information from environmental baseline conditions. The county must track net changes (gain or loss) over time to meet the standard of no net loss. The no net loss standard is intended to stop habitat loss that has occurred on the state’s shorelines over the years. The potential for mitigation to succeed has to be estimated against a baseline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes.	Development Regulations
546	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1. General Mitigation Standards Permit Review Process, Tracking The county must develop a systematic permit review process and tracking system that achieves no net loss. A tracking system will measure a permit’s baseline conditions and track net changes in habitats and natural resources over time. A systematic review process requires an accurate assessment of impacts, avoiding unnecessary and unmitigable impacts, and mitigating the unavoidable impacts through a process that includes monitoring. Site visits are crucial, as they may differ significantly from a planner’s views of a site plan or GIS map in the office.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes.	Development Regulations
547	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1. General Mitigation Standards Permit Review Process, Tracking To assure project mitigation is accomplished, the county must consider using financial guarantees. Financial guarantees have the advantage of assuring developers will complete the mitigation work and submit monitoring reports. Authorize financial guarantees in the code or other regulations. Require estimates, and a binding clause for access to the property. Write conditions for staging, and tie compensatory mitigation to the stages. The county can use general boilerplate conditions of approval as checks on compliance for phased projects. The developer then has an incentive to comply before moving on to the next project. Customized staging conditions can effectively tie compensatory mitigation to stages. It may involve extra work initially for the county, but a streamlined system will far outweigh the benefits to the public and environment in the long run.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
548	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	B.1.A. Critical areas The county must include land necessary for critical area buffers in the SMP. A net gain in buffer width means a net gain in ecological functions for all, including water quality and quantity, habitat, and amelioration of climate change. The county must direct cities and local jurisdictions to do the same. The county must establish buffers large enough, and/or necessary to, protect critical areas. Critical area buffers may be greater than standard shoreline buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
549	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	B.1.B. 19.400.110.A.2. Please change the wording: “Application of the mitigation sequence shall achieve no net loss of ecological functions for each new development. and shall not result in required m Mitigation. in excess of that which is necessary is not a requirement.” There is no reason to penalize additional mitigation, should a developer create it. The SMP must not allow new land alterations and development that results in a net loss of ecological functions. The county must encourage net gains in both programmatic (planning-level decisions) and project (site-specific design detail) bases, when conducting mitigation sequencing.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes.	Development Regulations
550	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	B.1.B. 19.400.110.A.2. Please change the wording: The county can prevent net losses from happening by including the following in the SMP: <ul style="list-style-type: none">Carefully design mitigation to replace all ecological functions lost by development or activities. Good designs avoid more rigorous permit requirement follow-up and the need for enforcement of impacts.Require high enough replacement ratios so the mitigation can replace the functions lost.Make sure mitigation is located in an area in which it can function, and that it is monitored and maintained until it is fully established.Make site visits more cost-effective:Conduct both pre-application site visits and normal application site visits, if possible.Schedule consistent site visits for a day with time slots, fill the schedule in advance, and include group-scheduled site visits into geographic areas, to reduce travel time.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
551	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	B.1.B. 19.400.110.A.2. Please change the wording: The county can prevent net losses from happening by including the following in the SMP: <ul style="list-style-type: none">Prepare support materials in advance to make the most of site visit time (GIS materials, natural resource information, proposal sketches, etc.).Include staff, either from the local jurisdiction or another agency, with training and experience conducting natural resource assessments related to development.Opportunistically include site visits for projects, such as when driving by a site for other reasons. Such visits might include a second visit to confirm conditions, adding a new pre- application site visit, emergency situations, etc.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
552	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	B.1.A. Critical areas The county must include land necessary for critical area buffers in the SMP. A net gain in buffer width means a net gain in ecological functions for all, including water quality and quantity, habitat, and amelioration of climate change. The county must direct cities and local jurisdictions to do the same. The county must establish buffers large enough, and/or necessary to, protect critical areas. Critical area buffers may be greater than standard shoreline buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
553	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	B.1.B. mitigation sequencing, compensatory mitigation (SMP 19.400.110 Mitigation: A. Mitigation Sequencing, B. Mitigation Options, C. Mitigation Compliance.) Avoid impacts to shorelines when applying mitigation sequencing. The county must give the highest priority to avoiding impacts whenever new uses or development are proposed in shorelines. To achieve no net loss using mitigation, the county must: <ul style="list-style-type: none">Stand firm on avoiding and minimizing impacts and require effective compensation for any remaining impacts, with complete review of all potential impacts.Honor the required buffers;Move structures back from buffers for uses that are not truly water dependent. Protect areas with intact vegetation.Rarely use variances or exemptions; keep as a rare exception rather than the rule.Ensure developers provide full compensatory mitigation. The county must require compensatory mitigation to occur in related habitat areas to allow for gain in same ecological functions and ecosystem-wide processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes.	Development Regulations
554	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	19.400.110.A.2. Please change the wording: “Application of the mitigation sequence shall achieve no net loss of ecological functions for each new development. and shall not result in required m Mitigation. in excess of that which is necessary is not a requirement.” There is no reason to penalize additional mitigation, should a developer create it. The SMP must not allow new land alterations and development that results in a net loss of ecological functions. The county must encourage net gains in both programmatic (planning-level decisions) and project (site-specific design detail) bases, when conducting mitigation sequencing.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes. Ex/ "Advanced Mitigation" to allow property owners to receive ecological mitigation credit for voluntary restorative actions conducted. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on mitigation.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
555	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	General Feedback / No Specific Section	Change Requested	<ul style="list-style-type: none">• Make site visits more cost-effective:• Conduct both pre-application site visits and normal application site visits, if possible.• Schedule consistent site visits for a day with time slots, fill the schedule in advance, and include group-scheduled site visits into geographic areas, to reduce travel time.• Prepare support materials in advance to make the most of site visit time (GIS materials, natural resource information, proposal sketches, etc.).• Include staff, either from the local jurisdiction or another agency, with training and experience conducting natural resource assessments related to development.• Opportunistically include site visits for projects, such as when driving by a site for other reasons. Such visits might include a second visit to confirm conditions, adding a new pre- application site visit, emergency situations, etc.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes. Ex/ "Advanced Mitigation" to allow property owners to receive ecological mitigation credit for voluntary restorative actions conducted. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on mitigation.	Development Regulations
556	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.B. shoreline vegetation buffers; setbacks</p> <p>Buffer Width Averaging Developers must propose buffer width averaging through submittal of a habitat assessment study or report.</p> <p>Modify standard buffer widths by averaging or increasing as follows. Buffer width averaging shall be allowed only when the applicant demonstrates all of the following:</p> <ul style="list-style-type: none">• The decrease in buffer width is minimized by limiting the degree or magnitude of the regulated activity.• Buffer averaging will not adversely impact the water body.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
557	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.B. shoreline vegetation buffers; setbacks</p> <p>Buffer Width Averaging Developers must propose buffer width averaging through submittal of a habitat assessment study or report.</p> <p>Modify standard buffer widths by averaging or increasing as follows. Buffer width averaging shall be allowed only when the applicant demonstrates all of the following:</p> <ul style="list-style-type: none">• Buffer averaging is consistent with other buffer requirements set forth under this Title (e.g., wetlands, critical fish and wildlife species and habitats, landslide hazard areas, etc.).• Buffer averaging will not increase the risk of slope failure or downslope stormwater drainage impacts.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
558	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.B. shoreline vegetation buffers; setbacks</p> <p>Buffer Width Averaging</p> <ul style="list-style-type: none">• The total buffer area after averaging is no less than the buffer area prior to the averaging. (Refer to Figure_.)• The minimum buffer width after averaging will not be less than 50 percent of the widths established in the county code.• Averaging is accomplished within the project boundaries or through an off-site conservation easement or tract (or other acceptable protective mechanism) approved by the Department.• The applicant demonstrates one or more of the following conditions:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
559	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.B. shoreline vegetation buffers; setbacks</p> <p>Buffer Width Averaging</p> <ul style="list-style-type: none">• The proposed buffer area contains a diversity of native vegetation distributed within at least two stratum (i.e., groundcover, shrub, sapling, tree); or• The project includes a buffer enhancement plan as part of the required mitigation. The plan shall use plant species that are native and non-invasive to the project area. The plan must substantiate: 1) the enhanced buffer will improve the functional attributes of the buffer, and: 2) provide additional protection for a habitat’s functional values.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
560	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>Aquaculture The county shall include Aquatic standard buffers in the Buffer Width section and environmental designation table.</p> <p>The aquaculture industry’s use of shorelines must be consistent with the regulations of the Shoreline Management Act, the shoreline master program, and best available science. A water-dependent use, aquaculture is polluting western coastlines, sounds, and estuaries with plastics. The use of plastic by the aquaculture industry is pervasive, and will increase with industry expansion.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
561	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>Aquaculture</p> <p>Geoduck aquaculture mitigation practices, when based on Best Available Science, are known to reduce risks to birds and other wildlife. Use these mitigation practices to reduce these and other risks.</p> <p>A setback of 10 feet from the property line of adjoining tidelands must be observed to avoid trespass on neighboring properties during aquaculture operations.</p> <p>A ten-foot buffer zone should be required around established native eelgrass beds, or where native eelgrass is present at densities greater than 4 leaf shoots (turions) per square meter. No geoduck planting or other operational activities will be undertaken within this buffer zone. The county reserves the right to increase or decrease this buffer as new data become available on environmental effects.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
562	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Aquaculture	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							[TABLE FROM PIERCE COUNTY ON REGULATED ACTIVITY]		
							The following table presents buffer widths to protect Submerged Aquatic Vegetation from aquaculture and other activities. Include these buffer widths in the SMP:		
							Employ 185-foot buffers around all native aquatic vegetation beds to protect both native aquatic vegetation and fish, marine mammals, birds and other native animal life that depend on the beds for one or more of their life histories.		
563	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Locate geoduck aquaculture beds away from sand dollar beds and native shellfish beds, and separate with at least a 185-foot buffer to protect native animal life from impacts due to aquaculture activities.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							Aquaculture		
							[TABLE FROM PIERCE COUNTY ON REGULATED ACTIVITY]		
							Consider a financial guarantee from aquaculture operators to ensure buffers containing vegetation/sea life around aquaculture installations remain intact.		
564	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	140 Bulk and Dimension Standards	Change Requested	Prevent all entry, including barges and equipment, into native aquatic vegetation beds and buffers during all site work.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							A qualified independent third party consultant shall monitor vegetation density and bed size prior to any site work from planting to harvest, plus one post-harvest growing period.		
							Setbacks (19.400.140 Bulk and Dimension Standards)		
							Do not allow standard SMP buffer widths or setbacks to be modified or reduced; not for Shoreline Environmental Designations, vegetation conservation, or other areas.		
565	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Adequate buffer widths are the most straight-forward protection method available for ecological functions; buffer widths should be maximized to account for unforeseen effects, including climate change and sea level rise.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							19.400.120.B.4. Vegetation Conservation Buffers - "An additional 15-foot building setback must be maintained beyond the outer boundary of the buffer. This building setback may be reduced provided that the resulting setback is protective of existing vegetation within the buffer." Please ensure this setback, at a minimum.		
							Move structures away from the shoreline. Set structures back from required shoreline buffers to:		
							• ensure compatibility between uses, and		
566	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	• protect buffer areas from residential activities.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							Aquaculture activities shall be set back a minimum of 10 feet from adjacent parcels that are not associated with the aquaculture activity (WAC 365-190-130). The 10-foot setback requirement shall be increased:		
							• When the shoreline contains multiple individual aquaculture activity areas, and/or		
							• When plans proposed by aquaculture demonstrate that a greater distance is required between areas or adjacent parcels.		
567	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	19.400.120.B.4. Vegetation Conservation Buffers -	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							Base expanded setbacks on water body and shoreline characteristics and an analysis of the shoreline development. Base expanded setbacks on:		
							• Water body and shoreline characteristics, and		
							• An analysis of the legally established shoreline development.		
568	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Setback distances ensure that other shoreline uses, including recreation or public access, are maintained to ensure protection of shoreline functions and processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							When re-development occurs, condition projects with shoreline restoration or mitigation.		
							Locate septic tanks and drain fields for new sewage disposal systems outside of shoreline setbacks and buffers.		
							When on-site sewage systems are required for residential development, install the systems and associated drainfields outside of shorelines.		
569	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Buffer Width Reductions - Marine, Rivers, Streams	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							All Marine standard buffer widths were decreased from the SMP 2017 draft update to the 7.2018 draft update:		
							Marine Buffer Widths, changes 2017 to 7.2018:		
							• Shoreline Residential: standard = 85 to 50 feet, reduced = 60 to 0 or 50		
570	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	• Urban Conservancy: standard = 250 to 125 feet, reduced = 100/75/below to 90/75/below	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							• Rural Conservancy: standard = 250 to 150 feet, reduced= 150 to 110		
							• Natural: standard = 250 to 200 feet, reduced = 200 to 150		
							(Mining): standard = 250 to 200 feet, Reduced = 0 or Type III to 0 or 200		

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
569	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	• Shoreline Residential: A 35 foot decrease in buffer width can diminish buffers to a lower condition. Fifty feet total from edge of buildings, along with increased population levels, is the absolute minimum and may not be protective of ecological functions in built areas with the additional impervious surfaces and stormwater issues. In addition, the county must mandate open spaces to create play areas and wildlife corridors. Cluster buildings away from buffers, toward streets and use homeowner agreements or other mechanisms to protect and maintain open space.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers."	Development Regulations
570	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	• Urban Conservancy: This buffer has been cut in half. Septic fields can directly affect shorelines and water quality. See Shoreline Residential, above.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers."	Development Regulations
571	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	• Rural Conservancy: Buffers suffer from septic and agricultural chemical use. Maintain the 2017 update width.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers."	Development Regulations
572	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	• Natural: Natural SEDs are considerably smaller in size than in the past. The Natural buffer width should be increased from the 2017 draft update, not decreased, to protect remaining ecological functions within and supporting adjacent SEDs.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers."	Development Regulations
573	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	• Mining: A reasonable Marine buffer, between 200 and 1000 feet, around mines should be viewed as a necessity. A Type III permit should still be considered for mining. Allowing no Reduced buffer width is unacceptable.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers."	Development Regulations
574	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	A buffer width reduction may be proposed through submittal of a habitat assessment study or report. A reduction in a buffer width shall be allowed only when the applicant demonstrates all of the following: • Buffer reduction is unavoidable. • Buffer reduction has been minimized by limiting the degree or magnitude of the regulated activity. • Buffer reduction is consistent with other buffer requirements set forth under this code (e.g. wetlands, critical fish and wildlife species and habitats, landslide hazard areas, etc.) • Buffer reduction will not adversely impact water bodies. • The buffer width will not be reduced more than 25 [consider 12-15] percent below the provisions of the code.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
575	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	A buffer width reduction may be proposed through submittal of a habitat assessment study or report. A reduction in a buffer width shall be allowed only when the applicant demonstrates all of the following: • The buffer meets the requirements of the code, or • A buffer enhancement plan is provided (as required by the code): 1) The buffer enhancement plan shall use plant species that are native and non-invasive to the project area; and 2) The plan must substantiate that the enhanced buffer will improve the functional attributes of the buffer to provide additional protection for the habitat's functional values. • The buffer has less than 15 percent slopes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
576	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	Buffer Width Reduction – Lakes Freshwater Lakes: The Freshwater section is incomplete, and associated information is confusing and difficult to find. Why are Freshwater Lakes included only in 2018? The 2017 update, 19.400.120.B.1. lists standard buffers for Marine and only Freshwater. Later, it refers to rivers and streams, but not lakes. Was Freshwater supposed to be Freshwater Lakes? We cannot comment until this information is corrected.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
577	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Standards	Change Requested	Buffer Width Reduction – Lakes Freshwater Lakes: The 7.2018 update states standard and reduced Lake buffers are the same. Yet (if Freshwater meant Freshwater Lakes) Shoreline Residential and Natural SED standard buffers were reduced from 2017 to 7.2018 by 25 and 50 feet, respectively. Place larger buffers on Lakes. County lakes lead to streams that reach Puget Sound. Landowners on a lake or stream bank without adequate buffers may use chemicals (pesticides etc.), fertilizers, detergents, or household wastes that end up in the water, killing fish and causing algae blooms.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
578	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>Buffer Width Reduction – Lakes</p> <p>Freshwater Lakes:</p> <p>A lake or stream buffer width should consist of three zones at a minimum of 55 feet. The first zone, trees and shrubs and other vegetation, extending from the water’s edge, should be at least 15 feet. Zone 2, which focuses on nutrient uptake upslope, should be 20 feet. These two zones provide travel corridors for wildlife. Zone 3 extends a minimum of 20 feet upslope and landward of Zone 2, and consists of tall grasses or herbaceous cover. On steeper slopes, the minimum width must be 40 feet or more. The county should incorporate this methodology, developed in Michigan, into the SMP.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
579	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>The standard buffer in a vacant lot along a lake may be reduced as follows:</p> <ul style="list-style-type: none">Where the vacant lot has a common property line with two or more lots that 1) abut the ordinary high water line and 2) are developed with single-family residences, the standard buffer may be reduced to the greater of 50 feet or the average of the standard buffer and the setbacks of the residences on the adjacent properties. This reduction does not apply where the criteria of the county code apply.Any water dependent accessory use may be allowed in the reduced buffer with the issuance of a Conditional Use Permit. The permit shall be predicated on a determination that the project will be consistent with the Conditional Use criteria (WAC 173-14-140), if applicable; and the use will cause no reasonable adverse effects on the environment and other uses.	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
580	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>The standard buffer in a vacant lot along a lake may be reduced as follows:</p> <p>The Conditional Use Criteria include:</p> <ul style="list-style-type: none">Views from surrounding properties will not be unduly impaired.Adequate separation will be maintained between the structure and adjacent properties and structures.Screening and/or vegetation will be provided to the extent necessary to ensure aesthetic quality.Design and construction materials shall be chosen so as to blend with the surrounding environment.No additional harm to the aquatic environment will result from the project.	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
581	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.C. Impacts requiring compensatory mitigation</p> <p>Aquaculture</p> <ul style="list-style-type: none">Clearing or thinning of native aquatic vegetation. If a net loss of native eelgrass on the leasehold/parcel is found to be the result of aquaculture activity, replanting will not be permitted and mitigation will be required. <p>The county must give critical saltwater and freshwater habitats consideration and protection from development, especially dredging. These aquatic habitats, especially unvegetated marine habitats, include mudflats, sandy beaches, forage fish spawning beaches, intertidal areas, oyster/barnacle beds, estuaries, and pocket estuaries. The county must protect these very important areas, as well as vegetated areas.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations
582	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.C. Impacts requiring compensatory mitigation</p> <p>Aquaculture</p> <ul style="list-style-type: none">Clearing or thinning of native aquatic vegetation. If a net loss of native eelgrass on the leasehold/parcel is found to be the result of aquaculture activity, replanting will not be permitted and mitigation will be required. <p>The county must give critical saltwater and freshwater habitats consideration and protection from development, especially dredging. These aquatic habitats, especially unvegetated marine habitats, include mudflats, sandy beaches, forage fish spawning beaches, intertidal areas, oyster/barnacle beds, estuaries, and pocket estuaries. The county must protect these very important areas, as well as vegetated areas.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations
583	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.C. Impacts requiring compensatory mitigation</p> <p>Mining</p> <p>NOAA NMFS recommends the county make all reasonable efforts to identify gravel sources in upland areas and terraces before deciding to site project operations in or near streams:</p> <p>1. Use upland aggregate sources, terraces and inactive floodplains before using active channels, their deltas, and floodplains. Situate gravel extraction sites outside the active floodplain. Do not excavate gravel from below the water table. Dry-pit mining on upland outcrops, terraces or the floodplain is preferable to any in-stream alternative.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
584	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.C. Impacts requiring compensatory mitigation</p> <p>Mining</p> <p>NOAA NMFS recommends the county make all reasonable efforts to identify gravel sources in upland areas and terraces before deciding to site project operations in or near streams:</p> <p>2. Site pit excavations located on adjacent floodplains or terraces outside the stream’s channel migration zone (CMZ), and as far from the stream as possible. Separate pits from active channels with a buffer designed to maintain this separation for several decades. Ecology has tools to help the county in identifying CMZs. CMZ is the channel where a stream moves over time, providing important habitats and natural diversity.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
585	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.C. Impacts requiring compensatory mitigation</p> <p>Mining</p> <p>NOAA NMFS recommends the county make all reasonable efforts to identify gravel sources in upland areas and terraces before deciding to site project operations in or near streams:</p> <p>3. Use larger rivers and streams before small rivers and streams. Instream gravel extraction is environmentally unsafe since erosion changes the CMZ as soon as gravel extraction begins. In larger systems, the overall impact and disturbance of gravel extraction is proportionally smaller. On a smaller river or stream, the extraction site’s location is more critical since exposed gravel deposits are limited and the floodplain is narrower. In either case, NMFS recommends a low extraction volume relative to coarse sediment load.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
586	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_Development_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.C. Impacts requiring compensatory mitigation</p> <p>Mining</p> <p>NOAA NMFS recommends the county make all reasonable efforts to identify gravel sources in upland areas and terraces before deciding to site project operations in or near streams:</p> <p>4. Strictly limit in-stream gravel removal quantities so that gravel recruitment and accumulation rates are sufficient to avoid prolonged impacts on channel morphology and anadromous fish habitat.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
587	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	5. Allow gravel bar skimming only under restricted conditions: <ul style="list-style-type: none">• Gravel be removed only during low flows and from strictly-defined areas above the low- flow water level;• Berms and buffer strips be used to direct stream flow away from the site and to provide for continued migratory habitat;• The final grading of the gravel bar does not significantly alter the flow characteristics of the river during periods of high flows;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
588	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	5. Allow gravel bar skimming only under restricted conditions: <ul style="list-style-type: none">• Bar skimming operations be monitored to ensure they are not adversely affecting gravel recruitment or channel morphology either upstream or downstream from the site;• Geomorphic features be monitored using methods that quantify their physical dimensions and changes at appropriate time scales; and• Any gravel removal in streams or rivers that have a recent history of eroding bars or banks, or stream bed lowering, be discouraged.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
589	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	6. Prior to gravel removal, conduct a thorough review of sediments and of point and non-point sources of contaminants. 7. Gravel extraction activities must avoid removing or disturbing large woody debris and other types of in-stream roughness, and replace or restore those that are disturbed. 8. Manage gravel extraction operations to avoid or minimize damage to stream/river banks and riparian habitats. 9. Cumulative impacts of gravel extraction operations to anadromous fishes and their habitats must be addressed by the Federal, state, and local resource management and permitting agencies. Cumulative impacts must be considered in the permitting process.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
590	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	10. An integrated environmental assessment, management, and monitoring program must be a part of any gravel extraction operation, and encouraged at Federal, state, and local levels. 11. Mitigation must be an integral part of the management of gravel extraction projects. 12. Gravel extraction projects proposed as stream restoration activities be regarded with caution. Any proposals to perform gravel extraction for habitat enhancement purposes must be conducted in consultation with NMFS regional field offices and technical experts. NMFS recommends that gravel extraction in conjunction with commercial gravel operations for habitat enhancement purposes not take precedence over, and not be a substitute for, habitat protection.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
591	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.D. Mitigation is not required for impacts outside of the standard buffer The SMA provides local governments with the option to include critical areas buffers that extend outside the minimum shoreline jurisdiction within shoreline jurisdiction [RCW 90.58.030 (2)(d)(ii)]. Is the county using this option?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations
592	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.I. In-Kind Measures Keep in-kind mitigation measures in-place. In-kind mitigation is typically the best approach to replicate functions that would otherwise be lost. In rare occasions when in-kind mitigation is not possible, the county must require out-of-kind mitigation that can reverse (mitigate for) the impacts of the new development on the specific ecological function within 200 feet. For example, if a new dock increases potential for predation of juvenile fish, mitigation should provide function to either reduce predation in other ways or increase salmon population.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes. Ex/ "Advanced Mitigation" to allow property owners to receive ecological mitigation credit for voluntary restorative actions conducted. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on mitigation.	Development Regulations
593	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.J. Public Access We recognize the benefits of creating access for the public, yet we have questions about the extent to which access is being used instead of mitigation: <ul style="list-style-type: none">• How does the county intend to achieve no net loss if it allows developers to require public access as a way to reduce the amount of required mitigation by 50%?• What are “measures” from public access projects that mitigate impacts to ecological functions?• How can public access accommodate mitigation of ecological functions? Allowing a developer to reduce his mitigation by half by including public access is not the way to protect ecological functions. Unmanaged, public access can create a net loss of environmental functions. Reducing mitigation would create a rush of developers placing public access to avoid having to mitigate. Any measure to protect the environmental functions that would be lost by reducing mitigation is gone. Adding public access to a project comes with its own set of damages to environmental functions that would require greater buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
594	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>B.1.J. Public Access</p> <p>Conservation Easements: Adverse environmental impacts to shoreline ecological processes and functions resulting from public access should preclude public access. Do not allow public access if it creates impacts that would need to be mitigated.</p> <p>Placing a conservation easement on half of a natural area, and surrounding it with development of the other half, is not an effective way to protect environmental functions. Land trusts use conservation objectives to place conservation easements, not mitigation areas reduced by 50% for public access.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
595	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.2 Mitigation Standards for Specific Development Activities	Change Requested	<p>B.2.A., B.2 Mitigation Standards for Specific Development Activities</p> <p>Vegetation Clearing Why is mitigation for lawns halved? Including public access in a development that is removing lawn should not reduce a permit’s mitigation by up to 50%.</p> <p>If a large property has one acre or more of grass, under Thurston’s scenario, the developer may not mitigate enough to show no net loss. Lawn is a combination of exotic vegetation. Most turf grasses are native to Europe. Planting natives in small areas surrounded by non-native vegetation, with no regular maintenance, could be expected to fail. Pierce County’s approach removed the issue that lawns provide no shade and are primarily exotic vegetation.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations
596	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.2 Mitigation Standards for Specific Development Activities	Change Requested	<p>B.2.A., B.2 Mitigation Standards for Specific Development Activities</p> <p>Vegetation Clearing</p> <p>Thurston County would benefit from using Pierce County’s Tiered Mitigation Program (18E.40.050) based on EPA’s methodology for functions, and supersedes the current wetland methodology approach, rather than Kitsap’s Mitigation Option, which includes a provision for public access that halves mitigation.</p> <p>Pierce County, in their Tiered Mitigation strategy, prescribes simpler requirements for minor projects, and customized requirements for larger projects, under 1,000 square feet called an “Abbreviated Planting Plan.” Projects that affect 1,000 square feet or more must conduct a Habitat Assessment Study. More complex projects with additional mitigation requirements must submit a Habitat Assessment Report. The goal of tiered mitigation is to insure existing stream functions are not lost from the watershed. By establishing an acre as the standard, city and many urban properties have less mitigation and therefore, less costs.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations
597	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.2 Mitigation Standards for Specific Development Activities	Change Requested	<p>Pierce County recommends the use of the following table for the Abbreviated Planting Plan:</p> <p>[PIERCE COUNTY VEGETATION CONSERVATION MITIGATION PLANTING TABLE]</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations
598	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.2 Mitigation Standards for Specific Development Activities	Change Requested	<p>B.2.A. Vegetation Clearing - The county must prioritize retaining vegetation or replanting for all development, uses, or activities, whether a permit is required or not, inside or outside a buffer.</p> <p>Require replanting when existing native vegetation is altered. Prioritize retaining vegetation in requirements for shoreline buffers or vegetation management areas.</p> <p>Enhancing vegetation within shoreline buffers or setbacks should consist of using plants that do not require use of fertilizers, pesticides or chemicals that are detrimental to water quality or harmful to aquatic life.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations
599	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.3 New and Replacement Shoreline Armoring or Barrier Structures (in order of preference)	Change Requested	<p>B.3. New/Replacement Shoreline Armoring or Barrier Structures</p> <p>Do not permit new or expanded structures in shoreline or shoreland standard or reduced buffers under any circumstances.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Development Regulations
600	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.5 Alternative Mitigation Options	Change Requested	<p>B.5 Alternative Mitigation Options</p> <p>B.5.C. In-Lieu programs, Restoration “While in-lieu programs are attractive, innovative and can result in better mitigation outcomes, when well-designed and effectively implemented, they require accurate accounting of impacts and the needed mitigation. In addition, these programs require the conversion of that mitigation into units provided by the program, and establishment of fees to cover the mitigation units.” (Futurewise) Old stream mitigation is based on, among other things, restoration priority levels and/or changes to create a stable channel. This results in a push for maximum stream channel shape change to get a maximum number of credits and a focus on shape, rather than stream functions.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p>	Development Regulations

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
601	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.5 Alternative Mitigation Options	Change Requested	B.5 Alternative Mitigation Options	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							B.5.C. In-Lieu programs, Restoration		
							Why isn't the county using the stream functions approach to quantifying mitigation for credits, a newer approach established by EPA? The county must consider this approach as a strategy to determine mitigation credits.		
602	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.5 Alternative Mitigation Options	Change Requested	To evaluate projects for mitigation credits, a five-level Stream Functions Pyramid approach is now being used by EPA. The new approach is based on the functions of streams, rivers, and their riparian zones, the first layer. Compensatory mitigation credits are now determined by functions lost at each level and success standards for replacing those functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							B.5 Alternative Mitigation Options Pierce County's SMP Update includes tiered levels of required mitigation reports with less complex reports required for projects covered by built-in mitigation and more detailed reports required for other projects.		
							Program and Funding gaps: 1) MRC - The county must establish a Marine Resources Committee to coordinate efforts to restore and preserve the county's ecological functions and natural resources. The MRC's mission is to address, using sound science, the needs of Thurston County's marine ecosystem. The committee would work closely with local and state officials to help implement the committee's recommendations and promote public outreach and education.		
603	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.5 Alternative Mitigation Options	Change Requested	B.5 Alternative Mitigation Options Pierce County's SMP Update includes tiered levels of required mitigation reports with less complex reports required for projects covered by built-in mitigation and more detailed reports required for other projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							Program and Funding gaps: 2) Armoring Structures - The county needs a program, similar to the septic loan program for private property owners, for removing unwanted or unnecessary structures. The county needs long-term funding sources for alternatives to hard armoring. The county suggests two solutions: one, to encourage alternatives, may be to lower the property owner's property tax for a set number of years, to make up the difference in cost between hard and soft armoring methods. Another solution involves a type of bulkhead-specific in-lieu fee program.		
							B.5 Alternative Mitigation Options Pierce County's SMP Update includes tiered levels of required mitigation reports with less complex reports required for projects covered by built-in mitigation and more detailed reports required for other projects.		
604	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.5 Alternative Mitigation Options	Change Requested	Program and Funding gaps: 3) Restoration and Mitigation - The county suggests Parcel Advance Mitigation, a type of mitigation system that involves restoration before development. Restoration must include monitoring and demonstrate benefits to environmental functions (a tiered approach, starting with groundwater recharge and discharge), during the 5 years prior to development.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							B.5 Alternative Mitigation Options Pierce County's SMP Update includes tiered levels of required mitigation reports with less complex reports required for projects covered by built-in mitigation and more detailed reports required for other projects.		
							Program and Funding gaps: 4) Monitoring and Restoration - Please heed the county's statement that current local funding does not provide for effective regulatory on-site monitoring. The system does not allow for enough time for monitoring to be meaningful. It also does not provide for an effective program structure for restoration. As a result, restoration projects are limited in their timelines and scope (goals, deliverables, tasks).		
605	15-Jul-18	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.5 Alternative Mitigation Options	Change Requested	B.5 Alternative Mitigation Options Pierce County's SMP Update includes tiered levels of required mitigation reports with less complex reports required for projects covered by built-in mitigation and more detailed reports required for other projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Development Regulations
							Program and Funding gaps: 4) Monitoring and Restoration - Please heed the county's statement that current local funding does not provide for effective regulatory on-site monitoring. The system does not allow for enough time for monitoring to be meaningful. It also does not provide for an effective program structure for restoration. As a result, restoration projects are limited in their timelines and scope (goals, deliverables, tasks).		
							B.5 Alternative Mitigation Options Pierce County's SMP Update includes tiered levels of required mitigation reports with less complex reports required for projects covered by built-in mitigation and more detailed reports required for other projects.		
606	30-Nov-17	Jim & Cindy Goldsmith	Email	AA_General_Fee_dback	General Feedback / No Specific Section	Other	The recent Marine Riparian Habitat Area Setbacks along the Thurston County marine shoreline are excessive, unwarranted, not required by any law, and appear to be subject, arbitrary, and inconsistent in their application.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
607	30-Nov-17	Jim & Cindy Goldsmith	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	An excessive setback of 265' has been imposed on our properties. This resulted in ruining over 10-years of retirement planning and investment. We know are forced into selling one of properties because the available building remaining building envelope is too small for our purposes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
								As of current SMP draft, the buffers and setbacks have been reduced, although this is still an area of continued discussion and high community interest.	
608	30-Nov-17	Jim & Cindy Goldsmith	Email	AA_General_Fee_dback	General Feedback / No Specific Section	Other	A parcel down the road from us apparently was not subjected to the same excessive setback that our property was subjected to. It appears their permits will allow them to build up to the original 100' Conservancy Zone buffer. Their bluff is about 30" high medium-bank versus our 3' to 7' low-bank.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
609	30-Nov-17	Jim & Cindy Goldsmith	Email	AF_General_Regulations_400	135 View Blockage	Policy Question	The CAO was supposedly based upon of "Best Available Science"... "This is a list of over 560 documents that is stated to represent a partial list of data and best available science. This is a very impressive list and would tend to intimidate most individuals that might have fallen victim to what appear to be onerous, unwarranted, and financially damaging regulations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
610	30-Nov-17	Jim & Cindy Goldsmith	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	We would like the county to honor the original 100' Conservancy zone that existed when we first purchased our properties and give us back the use of the extra 165' recently taken. Please note that we are not objecting to the property owners down the road being able to build on their new property, we are objecting to the obvious subjective and unequal treatment of our properties. Why does the neighboring property get ""grandfathered" in with the old conservancy setback, and our properties have a 265' setback imposed?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
611	1-Feb-18	Ann C. Harrie	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	General questions on resources, schedules, and proposed changes.	Forwarded to Planning Commission. Staff responded, provided information and answers.	No Action Required
612	6-Dec-17	Robert Jensen	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Observation of blue-green algae bloom and concern over septic systems around the lake.	Forwarded to Planning Commission.	No Action Required
613	6-Dec-17	Robert Jensen	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	170 Residential Development	Change Requested	Recommendation: New septic systems are prohibited in all shoreline lakes, within the urban growth areas in the County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
614	6-Dec-17	Robert Jensen	Email	AG_Permit_Provi sions_Review_an d_Enforcement_ 500	100 Permit Application Review and Permits	Change Requested	Recommendation: County Environmental Health (Environmental Health) shall, prior to the date of approval of this master program amendment, by Ecology; establish a maintenance schedule for all existing septic systems on these lakes. Wherever failing or leaking systems are found, the situation shall be rectified; under the supervision of Environmental Health, at the cost of the owner. Such systems shall be subject to a schedule of fines, developed by Environmental Health, prior to approval of this amendment by Ecology.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
615	6-Dec-17	Robert Jensen	Email	AG_Permit_Provi sions_Review_an d_Enforcement_ 500	105 Procedure	Change Requested	Recommendation: Environmental Health shall, prior to approval by Ecology of this amendment, develop a monthly fee to be charged to the owners of septic systems on the lakes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
616	6-Dec-17	Robert Jensen	Email	AD_Shoreline_Ju risdiction_and_E nvironment_Desi gnation_200	110 Shoreline Environment Designations	Change Requested	Recommendation: The waters of Pattison Lake shall be given a shoreline designation protective of its high water quality, valuable fish and wildlife habitat, and passive recreational use. Uses shall be limited to: swimming, canoeing, kayaking, paddle boarding, sailing, recreational fishing, and wildlife enjoyment. No water craft may exceed a five mile-per hour speed limit. Speed limit signs shall be placed on, or near the boat ramp; as well as on buoys in the north and south basins	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
617	28-Dec-17	Robert Jensen	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	E-mail correspondence on the legality/scope of Department of Ecology jurisdiction over shorelines.	Forwarded to Planning Commission.	No Action Required
618	29-May-18	David Lindeblom	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Discussion on availability of printed out SMP draft. Noted possible incorrections on bodies of wate rmaps (Eaton Creek Map)	Forwarded to Planning Commission.	No Action Required
619	29-May-18	Paula Lowe	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Please include me on the email list about SMP; I am a resident living on Pattison Lake. Thank you.	Forwarded to Planning Commission.	No Action Required
620	28-Jan-18	Jeff Nejedly	Email	AD_Shoreline_Ju risdiction_and_E nvironment_Desi gnation_200	General Feedback / No Specific Section	Change Requested	Zangle Cove should be designated as “Natural” similar to Little Fishtrap and Big Fishtrap and other inlets connected to freshwater creeks and streams. Zangle Cove is generally free from shoreline modifications, structures and intensive human uses and performs important and irreplaceable ecological functions. 19.200.140 Official Shoreline Map: The County Shoreline Designations Map should be updated to reflect Zangle Cove designated as “Natural”.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
621	28-Jan-18	Jeff Nejedly	Email	AD_Shoreline_Ju risdiction_and_E nvironment_Desi gnation_200	115 Shoreline Residential	Change Requested	19.200.115 Shoreline Residential : Management policies for this designation should prohibit commercial aquaculture since these operations are unsightly, disruptive and generally undesirable when in close proximity to shoreline homes. Allowing individual residential property owners to contract for commercial aquaculture operations in these areas has a direct negative impact on property values as well as impacts on ecological function. In addition, allowing commercial operations on residential zoned properties is inherently contrary to land use zoning.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
622	28-Jan-18	Jeff Nejedly	Email	AD_Shoreline_Ju risdiction_and_E nvironment_Desi gnation_200	130 Natural	Change Requested	19.200.130 Natural: The County’s proposed management policy should prohibit aquaculture and forest practices, which are an intensive human use, that would impact ecological function, contrary to the intent of no net loss. If we are to protect and restore Puget Sound and truly be stewards of this magnificent natural ecosystem, we must take these opportunities to protect our remaining highly functional shoreline from commercial aquaculture and forestry impacts.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
623	28-Jan-18	Jeff Nejedly	Email	AF_General_Reg ulations_400	100 Existing Development	Change Requested	19.400.100 - Existing Development: I agree with many other commenters in requesting that the County consider wording that “grandfathers” existing legal single family residences and structures and declares them as conforming. Retroactively declaring legally-built homes and appurtenances to be nonconforming under the current draft Shoreline Master Program would have tremendous impact across the County, subjecting hundreds of homeowners to the extra expense and limitations of variance permits as well as concerns of impacts upon value and insurability.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
624	28-Jan-18	Jeff Nejedly	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	105 Use and Modifications Matrix	Change Requested	19.600 Shoreline Use and Modification Development Standards : The matrix in 19.600.105 should be modified with the following: <ul style="list-style-type: none">Under Shoreline Residential, Geoduck and Other Aquaculture should be changed to “Prohibited” per comments above.Under Natural, Commercial Geoduck and Other Aquaculture should be changed to “Prohibited” per comments above. In addition Forest Practices should also be changed to “Prohibited”.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
625	28-Jan-18	Jeff Nejedly	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	105 Use and Modifications Matrix	Change Requested	<p>19.600.115 Aquaculture: As above, aquaculture including geoduck aquaculture should be prohibited from Shoreline Residential and Natural designated areas.</p> <p>The current draft SMP gives aquaculture access to operate anywhere on the Puget Sound shoreline with few restrictions. Allowing commercial aquaculture with so few restrictions will result in a net loss of ecological function from cumulative impacts and effects. If we are to protect and restore the Puget Sound estuary and truly a no net loss policy there must be some added restrictions on commercial aquaculture. Thurston County should review the Pierce County draft SMP (18S.40.030 and 18S.70 Appendix C) on Aquaculture and consider adopting similar policies and regulations. Some specific policies and regulations Thurston County should consider adding include:</p> <ul style="list-style-type: none">● Aquaculture Prohibited from estuaries within 300 feet of the mouth of freshwater streams (as measured at extreme low tide)● Aquaculture Prohibited adjacent to residential neighborhoods● Aquaculture application requirements should include a Cumulative Impact Analysis, Assessment of Impacts, and Financial Guarantee (see Pierce County SMP 18S.70 Appendix C).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
626	28-Jan-18	Jeff Nejedly	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>Hi Brad,</p> <p>I sent this earlier this week, but wanted to make sure you received my attached comments on the draft SMP.</p> <p>If you could confirm receipt of the attached I would appreciate it.</p> <p>Thank You,</p> <p>Jeff Nejedly</p>	Staff responded and confirmed reception of public comments. Forwarded to Planning Commission.	No Action Required
627	16-Feb-18	Jessica Norton, WA State Parks	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>Hello,</p> <p>It appears as though the County is still accepting comments on the proposed SMP update. Can you please tell me how long you will be accepting comments?</p> <p>Thank you, Jessica</p>	Forwarded to Planning Commission.	No Action Required
628	12-Oct-18	Martin W Olson	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>1. I was shocked at the poor quality of the sound system. (background noise, or no sound at all). How is it the County Commissioners main room, does not have a sound system that works?</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
629	12-Oct-18	Martin W Olson	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>2. The presentation on the power point was interesting but lacked any backing of truth. Many statements were made, about buffers and safe distances from water but where did the information come from?</p> <p>a. Many of the pictures looked to be from “stock google photos” In fact when questioned about one of the Before and After photos the presenter had no idea where the picture was taken, or any of the reasons for adding buffers on the property.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
630	12-Oct-18	Martin W Olson	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>2. b. A picture was shown with healthy fish of good size and compared to other fish of a small size and I presume “not as healthy”. The presenter stated these fish of good size came from a body of water with good buffer zones and adequate shade and natural habitat. No proof of these bold statements was offered, just a picture.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
631	12-Oct-18	Martin W Olson	Email	AA_General_Feedback	General Feedback / No Specific Section	Policy Question	<p>2.c. Comments were made about “water quality” Where is the documentation that our water quality has been improving or getting worse.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
632	12-Oct-18	Martin W Olson	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>3. The presenter talked about healthy bodies of water needing large buffers, I would ask everyone to look at the lake below the County Court House, or lake Lois off of Carpenter Road. These lakes have nothing but buffers and acres of property and they are dying bodies of water, soon to be swamps.</p> <p>a. If a statement is made about buffers and healthy water, it seems we should look at THURSTON COUNTY LAKES, for example my property and many of my neighbors had drain fields on the lake side our homes. Mine and most are now “designed systems” far away from the water front.</p> <p>b. The Lakes in Thurston County are better managed because of the residents living on the lakes, (they are the ones who care)</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
633	12-Oct-18	Martin W Olson	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>3.</p> <p>c. The presenter did not provide where any data came from, other than some comparisons to other counties concerning buffer zones.</p> <p>d. The Rivers and Puget Sound in Thurston County are Healthy and thriving with native fish and wildlife.</p> <p>i. Some will argue; the south sound is polluted. Then why does the south sound produce so much of the worlds oysters, clams and mussels?</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
634	12-Oct-18	Martin W Olson	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	4. The best part of the night (sarcastic) was when a women on the planning commission proclaimed that because of global warming we in the northwest (insinuated), (Thurston County) have experienced much more rainfall and stronger storms causing more damage to our waterfront properties. She believes because of this “global warming” the set-backs are good for protecting property owners homes. a. Please tell me of one home that has been lost to a storm in the Thurston County area because of the increase in magnitude of storms since global warming has started?	Forwarded to Planning Commission.	Public Participation/Engagement
635	12-Oct-18	Martin W Olson	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	I really don’t understand why Thurston County is even looking at the Shoreline Master Program. Who are they trying to protect, and who is benefitting? Why is this project taking so long? What are the goals? And where is the data to back up the claims? I apologize for my lack of knowledge and not knowing the name and positions of the presenters. I was invited to attend the meeting because, I was told the decisions coming from this SMP will affect my property with projects in the future. (setbacks, more permits, more county control). After attending, I am concerned about the years of work being poured into this project without any real substantial facts.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
636	9-Jan-18	Angela White, OMB	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Good Morning! This is an important issue for OMB, so I will make sure we have participation at the January 16th meeting. Thank you for reaching out. Thank you, Angela White Executive Officer Olympia Master Builders	Staff responded and asnwered questions. Forwarded to Planning Commission.	No Action Required
637	27-Jul-18	Angela White, OMB	Email	AF_General_Reg ulations_400	110 Mitigation	Change Requested	To not accidentally disincentivize these proactive measures, OMB suggests that voluntary improvements to ecological function of a property should be credited toward future potential development mitigation. We understand that the goals of the Department of Ecology are to mitigate and recover concurrently. As such, this mitigation might occur at less than a 1:1 ratio to achieve recovery while allowing homeowners to benefit from participating in voluntary compliance when they seek to redevelop or remodel.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
638	27-Jul-18	Angela White, OMB	Email	AF_General_Reg ulations_400	110 Mitigation	Change Requested	We recommend that. in addition to the mitigation options available to an individual. the county partner with its citizens to offer additional mitigation options for homeowners who have such county owned or administered impacts to shoreline ecology.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes. Ex/ "Advanced Mitigation" to allow property owners to receive ecological mitigation credit for voluntary restorative actions conducted. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on mitigation.	Future Discussion Item
639	27-Jul-18	Angela White, OMB	Email	AF_General_Reg ulations_400	100 Existing Development	Change Requested	<ul style="list-style-type: none">• That all legally established existing structures, inclusive of appurtenances, uses and lots are conforming and that provisions that change of ownership, tenancy or management does not affect the structure, use or lot's nonconforming status.• That 'remodeling' be included as an allowed activity in addition to "redevelopment, expansion, change with the class of occupancy, or replacement of the residential structure" in order to provide homeowners with the ability to update their property to current design standards and as new, ecologically sound materials and technologies emerge on the market.• That limited expansion of a nonconforming structure be permissible if it is tied to other actions to bring the overall use into conformity (e.g., upgrade of nonconforming septic system).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Future Discussion Item
640	27-Jul-18	Angela White, OMB	Email	AF_General_Reg ulations_400	100 Existing Development	Change Requested	<ul style="list-style-type: none">• That non-conforming structures with conforming uses within commercial or mixed-use developments may be expanded or enlarged within the existing building footprint as a conditional use.• That in pre-existing shoreline lots that are vacant but too small to meet the buffer requirements for new development, the SMP should allow for use-conforming development if a building area appropriately sized for the use exists and is not located in a hazard area.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Future Discussion Item
641	27-Jul-18	Angela White, OMB	Email	AF_General_Reg ulations_400	100 Existing Development	Change Requested	<ul style="list-style-type: none">• That residences destroyed by catastrophe may be reconstructed to the size, density and location that existed prior to the catastrophe with allowances for additional expansion, as otherwise defined within the master program.• That as a conditional use, a non-conforming dock may be modified, reoriented or altered within the same general location to be more consistent with the provisions of the SMP. This provision allows structures to be maintained, and minor location adjustments of dock/float structures, to improve consistency with the SMP without defaulting to the current standards.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Future Discussion Item
642	27-Jul-18	Angela White, OMB	Email	AF_General_Reg ulations_400	100 Existing Development	Change Requested	<ul style="list-style-type: none">• That property owners, in specific circumstances, be allowed to make environmental improvements to non-conforming structures (i.e. docks) through an administrative conditional use rather than tearing the entire structure out and applying for a shoreline variance.• That new single-family development on non-conforming lots consisting of property under contiguous ownership less than 20,000 square feet in size and not subject to landslide hazard areas, alluvial fan hazard areas, or riverine and coastal erosion hazard areas or associated	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
643	27-Jul-18	Angela White, OMB	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	a. Non-conforming lots with a building area of 3,000 square feet or more available for a single-family residence and normal appurtenances and unrestricted by setbacks or buffers from shorelines or critical areas shall comply with the provisions of this Program. The building area means the entire area that will be disturbed to construct the home, normal appurtenances (except drainfields), and landscaping.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Future Discussion Item
644	27-Jul-18	Angela White, OMB	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	b. Non-conforming lots that do not meet the requirement of subsection 1 above shall provide the maximum setback and buffer dimension feasible while providing for a building area of not more than 3,000 square feet on the portion of the lot farthest from the required setback or buffer; provided that consideration be given to view impacts and all single-family residences approved under this section shall not extend waterward of the common-line setback. c. Facilities such as a conventional drainfield system may be allowed within critical areas or their buffers, except wetlands and buffers, outside of the area specified above.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.	Future Discussion Item
645	30-Aug-18	Peter J Pessiki	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	My neighbor is developing his shoreline with housing shacks, a crude septic system and more. These are very close to the beach. I have tried to ask if what he is doing is legal but do not seem to be able to reach anyone that cares. His address is 4820 sunset dr nw 98502. I will do the same if you do not stop him since I will assume what he is doing is legal. I guess my point is this: stop making rules that you do not enforce. Suckers like me who obey the law get screwed while my neighbor develops like crazy. This is not fair!!!!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
646	2-Apr-18	Amy Tousley, PSE	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Good afternoon Brad, Please add Puget Sound Energy as an ‘affected party of record’ regarding the County’s update to the SMP. In addition to any e-blasts provided by Resource Stewardship, I appreciate you including me on any materials disseminated as part of the process. Thank you. Amy	Forwarded to Planning Commission.	Pending / Item for Discussion
647	13-Nov-17	Abby Ruskey	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Dear Planning Commissioners: First, thank you for your work to ensure completion of a plan that reflects the interests of our community and the natural systems we are so fortunate to have access to. As a planner myself, I understand how involved and onerous the process can be. As we move into the comment period for the proposed Thurston County Shoreline Management Plan (SMP) update, it has become evident to our local community that the current schedule for public input and participation provides too little time for thoughtful consideration and input by busy everyday people. I join with my neighbors to urge you to slow down and increase methods to ensure that citizens have a true voice in the process. Currently, the schedule has us feeling that the citizen input period is a token effort. The citizens of Thurston County will be the ones impacted by the new regulations. Please include broad community representation at all levels of the review process, including STAG and other meeting venues. The time to build confidence and trust in the process is right now. Thank you for your review of this and other neighbors related requests. Please let us know what you are able to do to accommodate our concerns at your earliest possible opportunity. Sincerely, Abby Ruskey Thurston County resident and property owner	Comments forwarded to Planning Commission. Staff respondend, confirmed received, answered questions. STAG team since disbanded. Forwarded to Planning Commission.	No Action Required
648	26-Apr-18	Steve Schulte	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	C. My first comment pertains to Section 19.400.120 (C) - Constrained Lot and Infill Provisions . The proposed reduced standard buffer for the Shoreline Residential designation is 60 feet. Additionally, the “Infill Provision” section allows an additional 10% reduction based on the View Blockage (Section 19.400.135) language. This would then result in, no less than a 54 foot setback requirement for our property. Based on my reading of the draft language, this appears to be the minimum setback for infill situations. However, discussions with County staff have indicated that this is not the intent of the proposed language. Instead, the intent for infill situations like ours, is that additional setback reductions may be allowed, such as that described in the “Constrained Lot Provisions” section. For example, language such as “or any amount of buffer reduction within the Shoreline Residential designation, a Type II Administrative Variance shall be required” would be available for use with infill situations. The problem is that, from my perspective, the “Infill Provision” section, is not tied in any way, to the Constrained Lot Provisions” section, such that there is no way to use that language for infill situations. I am requesting that the written language in these two sections of the draft SMP be clarified, thus providing for what I believe is County staff’s intent.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
649	26-Apr-18	Steve Schulte	Email	AF_General_Regulations_400	135 View Blockage	Change Requested	<p>My second comment has to do with Section 19.400.135 - View Blockage . We previously had an approved Shoreline Administrative Variance for our property, which was granted on March 4, 2008. Our Tax Parcel Number is 13801221800 and the Variance had a Project Number 2008100154. Due to financial reasons, we have had to let our variance lapse and have not been able to build, but are planning on doing so in the next few years. The approved variance only required a 30 foot setback from the ordinary high water mark. The basis for this 30 foot setback, was an averaging calculation of the actual setbacks of all built waterfront structures within 300 feet of our property. Four properties had already been built to the northeast (within the 300 foot distance) and had setbacks of 12, 21, 50, and 27 feet. To the southwest, the first and possibly the second properties, appear largely unbuildable, due to steep slopes. Additionally, those two lots are under common ownership with the third property, which contains the primary residential structure for the three lot complex (no setback was required for that residence). The first two lots themselves, appear to be used only for a driveway and parking area, garden, and beachfront cabana - all located outside of the steep slope areas. Further southwest, but within the 300 foot averaging distance, is a fourth property with a residence (30 feet setback).</p> <p>Moving forward, I am requesting that the County move away from using the proposed simplified averaging calculation, that would look at only the two lots abutting our property. At one time, it was important to look out 300 feet in each direction - why now is that not important?</p> <p>From my perspective, the proposed setback averaging calculation is very problematic and unfair - when using only two data points.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
650	3-Aug-18	Larry Seale	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Request for electronic copy of November 6th planning commission SMP power point	Staff responded with links and direction. Forwarded to Planning Commission.	No Action Required
651	27-Aug-18	Jessica Norton, WA State Parks	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	State Parks disagrees with the proposed “Natural” shoreline designation at Tolmie State Park and formally requests that it be designated “Rural Conservancy” consistent with the designations of the adjacent properties and Millersylvania State Park.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
652	27-Aug-18	Jessica Norton, WA State Parks	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>[2. Page 20, Section 19.200.100 Shoreline Jurisdiction: The Shoreline Master Program jurisdiction applies to all shorelines of the state in Thurston County and their associated shorelands. This includes:</p> <p>A.6 Buffers necessary to protect critical areas that are located within shoreline jurisdiction as described in this program. *</p> <p>*-optional jurisdiction]</p> <p>While it is understood that the RCW allows for expansion of jurisdiction to include critical areas buffers, if adopted, the area of shoreline jurisdiction would increase and additional areas of properties would be subject to the SMP and its additional layer of permitting requirements. There are inconsistencies between the proposed SMP and the existing Thurston County Critical Areas Ordinance (e.g., Special Reports requirements), which can be confusing. The SMP should clearly state which regulations (SMP or Thurston County Code) take precedence in cases where there may be “dual coverage” of critical areas and/or buffers.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Buffers are a continued high priority discussion item. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on buffers.</p>	Future Discussion Item
653	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>Page 40, Section 19.400.110(B) Mitigation Options:</p> <p>[5. When compensatory mitigation becomes necessary on a site where documented restoration activities]</p> <p>State Parks is supportive of this mitigation option as it allows for flexibility and more timely restoration efforts. Please clarify what type of documentation will be required to qualify previous restoration activities for mitigation.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changes. Ex/ "Advanced Mitigation" to allow property owners to receive ecological mitigation credit for voluntary restorative actions conducted. Per planning commission instruction, renewed discussions and community involvement is scheduled to gather more perspectives on mitigation.</p>	Future Discussion Item
654	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Page 41, Section 19.400.110(C) Mitigation Compliance:</p> <p>[1. Unless otherwise specified...]</p> <p>Requiring that mitigation take place prior to final project inspection has the potential to unnecessarily increase project timelines and costs. This is particularly true for projects that propose revegetation as mitigation, which requires planting during specific times of the year to ensure success, or for projects that have limited work windows. It is recommended that this be revised to require mitigation be completed within a specified timeframe (e.g., up to a year or 18 months) to allow for flexibility and unforeseen natural events.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
655	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>Page 42, Section 19.400.115(A) Incorporation of Title 24 TCC:</p> <p>[The following sections of Title 24 TCC, Critical Areas Ordinance...]</p> <p>To avoid confusion, it is recommended that Sections 19.400.115(B) – 19.400.115(G) clearly specify how they supplement or modify the pertinent sections of Title 24 TCC.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
656	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Page 45, Section 19.400.120(B) Buffer Widths:</p> <p>State Parks is concerned about the proposed standard buffer widths of up to 250 feet for shoreline jurisdictional freshwater streams and rivers. This buffer goes beyond the 200-foot SMP jurisdiction and exceeds the general recommendations for buffer width provided in Ecology’s Shoreline Master Programs Handbook. Not only does the new standard buffer requirement unfairly impact State Parks, but it also seemingly contradicts SMP Policies SH-5, SH-6, and SH-41, which promote increased public access and recreational opportunities in the shoreline.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
657	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Page 45, Section 19.400.120(B) Buffer Widths:</p> <p>A buffer of 250-feet effectively requires all development within the shoreline to provide mitigation in order to reduce the standard buffer, and deems many existing State Parks recreational/public access facilities “non-conforming.” While alternatives and considerations are provided for water-dependent uses (Section C), and other uses (Section D), these do not consider the full range of recreational/public access facilities within State Parks.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
658	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Page 45, Section 19.400.120(B) Buffer Widths: Existing State Park facilities with potential to fall within the proposed standard freshwater buffer include: concessions, restrooms/showers, kitchen shelters, a footbridge, parking, camping, and an Environmental Learning Center. As such, any improvements to recreation and public access within Millersylvania and Tolmie would be severely limited and require additional mitigation resulting in increased permitting requirements and costs.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
659	27-Aug-18	Jessica Norton, WA State Parks	Email	AF_General_Regulations_400	145 Public Access	Change Requested	Page 57, Section 19.400.145(J) Public Access: [Public access provisions shall run with the land and be recorded via a legal instrument...] RCW 58.17.110 applies to the establishment of subdivisions. This language should be revised to clarify that it does not pertain to State Parks, which is a public agency that provides access to public lands. As such, State Parks does not record easements for public access provisions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
660	27-Aug-18	Jessica Norton, WA State Parks	Email	AG_Permit_Provisions_Review_and_Enforcement_500	105 Procedure	Change Requested	Page 68, Section 19.500.105(A) Permit Process Summary: [If the application involves state owned land, a pre-application...] State Parks is not required to consult with a Department of Natural Resources land manager for development on State Parks owned land. This language should be revised to clarify that it does not pertain to State Parks.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
661	27-Aug-18	Jessica Norton, WA State Parks	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	145 Forest Practices/Timber Harvest	Change Requested	Page 94, Section 19.600.145(C) Development Standards: [9. Hazard tree removal or view tree limbing: Where a threat to... The critical area or shoreline buffer shall be replanted as determined by the Department...] Because State Parks provides public access and recreational opportunities within the shoreline, public safety is of primary concern. As such, requiring replanting at a 3:1 ratio for removal of hazard trees is not always practical or feasible. It is recommended that additional considerations for mitigation be allowed for removal of trees that provide a safety hazard to the public (e.g., use the removed tree as a snag for habitat).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
662	27-Aug-18	Jessica Norton, WA State Parks	Email	AI_Special_Reports_700	General Feedback / No Specific Section	Change Requested	There are inconsistencies between the special reports requirements in the proposed SMP and referenced Chapter 24.35 TCC. To avoid confusion, the SMP should clearly state which regulations (SMP or Thurston County Code) take precedence in cases where there may be “dual coverage” of critical areas and/or buffers. Additionally, it is recommended that each special report section clearly indicate when the report is required.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
663	27-Aug-18	Jessica Norton, WA State Parks	Email	AI_Special_Reports_700	105 Wetland Delineation Report	Change Requested	Page 115, Section 19.700.105(A) Minimum Wetland Delineation Report Contents: [6. General site conditions including topography, acreage...] The requirement to include information on all wetlands and waterbodies within one quarter mile of the subject wetland is not currently required by TCC 24.35.370 and this information may not be readily available if these areas are located on private property. It is recommended that this requirement be removed from the wetland delineation report.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
664	27-Aug-18	Jessica Norton, WA State Parks	Email	AI_Special_Reports_700	110 Wetland Mitigation Plan/Report	Change Requested	Page 116, Section 19.700.110 Wetland Mitigation Plan/Report: [As required by TCC 24.30.070 (Wetland Mitigation), a mitigation plan shall be prepared. A detailed mitigation plan shall contain the following: 3.C Description of any known cultural resources on the site...] The requirement to include information on cultural resources is not currently required by TCC 24.35.380 and much of this information is highly sensitive. Cultural resources are protected by a variety of state and federal laws, including Executive Order 05-05 and Section 106 of the National Historic Preservation Act. Additionally, per RCW 42.56.300, records, maps, or other information identifying the location of archaeological sites are exempt from disclosure to prevent looting or depredation. It is recommended that this requirement be removed from the wetland mitigation plan/report and that cultural resource information be addressed in a separate cultural resources report.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Mitigation is a continued high priority discussion item. Recent community feedback has been incorporated into recent proposals and changees.	Future Discussion Item
665	27-Aug-18	Jessica Norton, WA State Parks	Email	AI_Special_Reports_700	110 Wetland Mitigation Plan/Report	Change Requested	Page 118, Section 19.700.110 Wetland Mitigation Plan/Report: [C. Performance Bonds and Demonstration of Competence...] This requirement should be waived for State Parks and other public agencies. When proposing development in the shoreline, State Parks looks to several internal policies for guidance on balancing development needs with ecological protection. State Parks Stewardship policies for Critical Areas, Natural Resources Management, and Sustainability provide the basis for evaluating, avoiding, minimizing and/or mitigating environmental impacts for all State Park developments. Additional assurances should not be required for public agencies that have existing policies and experienced staff with a proven record of successfully executing mitigation projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
666	27-Aug-18	Jessica Norton, WA State Parks	Email	AI_Special_Reports_700	115 Habitat Management Plan	Change Requested	Page 119, Section 19.700.115(B) Habitat Management Plan: The HMP shall contain a map prepared at an easily readable scale, showing: [2. The relationship of the site to...] The requirement to include location information of cultural resource features is not currently required by TCC 24.35.290 and much of this information is highly sensitive. As indicated above, it is recommended that locations of cultural resource features not be shown in a habitat management plan, but instead be addressed in a separate cultural resources report.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
667	27-Aug-18	Jessica Norton, WA State Parks	Email	AL_Appendix_C_Shoreline_Restoration_Plan	C.5 Existing Programs and Funding Sources	Change Requested	Page C-16, Appendix C, Table C.5-1. Existing and Potential Restoration Partners and Roles: [Washington State Parks Mission and Scope – To be premier destinations...] The language provided in the table is the vision statement from the outdated State Parks Centennial 2013 Plan. This section should be revised to correctly reflect the current State Parks mission: “The Washington State Parks and Recreation Commission cares for Washington’s most treasured lands, waters, and historic places. State parks connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
668	27-Aug-18	Jessica Norton, WA State Parks	Email	AL_Appendix_C_Shoreline_Restoration_Plan	C.5 Existing Programs and Funding Sources	Change Requested	Page C-16, Appendix C, Table C.5-1. Existing and Potential Restoration Partners and Roles: [Washington State Parks Role in Future Restoration...] State Parks does not generally provide demonstration sites for alternative restoration or mitigation techniques. Please delete the first sentence so that this section reads as follows: “Implement restoration and conservation measures as outlined in Park Plans.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
669	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	19.200.100A	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							There is no mention of “buffers necessary to protect critical areas” in any section except the Mining section as cited in the following: 19.200.100Shoreline Jurisdiction Buffers necessary to protect critical areas that are located within shoreline jurisdiction as described in this program. * *- optional jurisdiction There is no mention of “buffers” on the tidelands related to commercial/industrial shellfish aquaculture and the consequent worker trampling, sediment transport, moorage of boats and barges on neighboring tidelands and on the tideland in question.		
670	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	19.200.100D	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Overall, in this document, there is an emphasis on the shoreline as a resource. “Resource,” as defined by the Oxford Dictionary, means, “a stock or supply of money, materials, staff, and other assets that can be drawn on by a person or organization in order to function effectively,” or "local authorities complained that they lacked resources". Synonyms: assets, funds, wealth, money, capital. We would hope that the emphasis related to the Thurston County SMP update would be on preservation of the natural character and ecology of the shoreline, not on the shoreline as a resource. Words do matter, and anyone reading this draft document could easily take the meaning to be a deference to utilization of the shoreline for profit rather than to protect it. At odds with this utilization of the shoreline are the new restrictions on upland shoreline home owners in order to “protect” the shoreline. We would therefore suggest caution in using the word “resource” to make sure whatever meaning is intended is perfectly clear and is not misconstrued. And we would suggest making protection of the tidelands as restrictive as the rules for the uplands. In other words, re-think your policy of unlimited commercial/industrial aquaculture development on the tidelands. There is an obvious double-standard that is insupportable.		
671	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	The term “resources” related to the shoreline is inadequate because “resources” in this context implies a commodity to be used for personal or corporate financial gain. The SMA specifically states that we must protect the resources and ecology of the shoreline. RCW 90.58.020 states: (4) Protect the resources and ecology of the shoreline; Change the sentence “Uses should be limited to those which sustain the shoreline area’s physical and biological resources” to “Uses should be limited to those which preserve the natural character and ecology of the shoreline.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
672	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	Please define the phrase “assure the protection of existing shoreline ecological functions.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
673	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	In fact, this program apparently allows in many if not most areas, commercial/industrial shellfish aquaculture on the tidelands without restriction, particularly in the most sensitive areas—estuaries. Estuaries are the nurseries of Puget Sound. Scraping the beach/estuary to get rid of sand dollars, crabs and other species (this is photo documented) that interfere with the commercial/industrial geoduck monoculture, as well as harvesting old time geoducks which live up to 168 years (since before statehood) and thus changing the balance of species, along with 43,560 PVC tubes (approximately 7 miles/16 tons), covered with plastic nets and utilizing rebar, DOES disrupt/destroy “the character of the environment” and DOES “result in a net loss of shoreline ecosystem functions.” Any idea that this can be mitigated with a few rules is fallacious.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
674	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	We assume that “local planning” involves citizen/neighborhood collaboration as to “land-use regulations.” This is currently lacking and the involvement of the public should be spelled out related to implementation of the approach in this section. In the phrase “Since every area is endowed with different resources,” the word “resources” should be changed to “characteristics.” The term “resources” applied to “every area” implies that every area is primarily for utilization for financial gain. The Oxford Dictionary: Resource(s) plural noun: resources Main definition: 1. A stock or supply of money, materials, staff, and other assets that can be drawn on by a person or organization in order to function effectively. "local authorities complained that they lacked resources". Synonyms: assets, funds, wealth, money, capital; See also: http://www.learnersdictionary.com/definition/resource	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
675	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	General Feedback / No Specific Section	Change Requested	19.200.110 Mining (NOTE: Since omitted in 2018 draft)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							A. Mining should be defined as to all types of mining that this section refers to, i.e., coal, oil, sand and gravel, etc.	Mining SED 19.200.110 since omitted in recent 2018 SMP draft	
676	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	General Feedback / No Specific Section	Change Requested	19.200.110 Mining (NOTE: Since omitted in 2018 draft)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							C.1 Examples of mining related to water-dependent, water-related and water-enjoyment uses need to be stated. Is this in reference to pools of water caused by mining that kids may swim in? Is this in reference to hazards created by mining on the shorelines? This section requires more explanation about what it is specifically referring to. As it is now, it is simply a words without context.	Mining SED 19.200.110 since omitted in recent 2018 SMP draft	
677	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	General Feedback / No Specific Section	Change Requested	19.200.110 Mining (NOTE: Since omitted in 2018 draft)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							C.2 Same problem as in #1. Examples of mining related to water-dependent, water-related and water-enjoyment uses need to be stated.	Mining SED 19.200.110 since omitted in recent 2018 SMP draft	

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
678	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	General Feedback / No Specific Section	Change Requested	19.200.110 Mining (NOTE: Since omitted in 2018 draft)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							C.4 Visual and physical public access to what? Old mines? Or is this meant to say that mining should not interfere with visual and physical public access to lakes, rivers, streams and saltwater? This needs to be clearly stated.	Mining SED 19.200.110 since omitted in recent 2018 SMP draft	
679	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	General Feedback / No Specific Section	Change Requested	19.200.110 Mining (NOTE: Since omitted in 2018 draft)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							C.5 • What are the specific “aesthetic objectives?” This need to be defined. • How will “sign control regulations” help to implement “aesthetic objectives?” • What would be an example of “appropriate development siting and screening?” • What are the “architectural standards?” • Define more clearly the meaning of “maintenance of natural vegetative buffers.” What is the definition of “maintenance” in this context and who will provide the “maintenance?”	Mining SED 19.200.110 since omitted in recent 2018 SMP draft	
680	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	General Feedback / No Specific Section	Change Requested	19.200.110 Mining (NOTE: Since omitted in 2018 draft)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							C.6 This paragraph is gobbledyguck, i.e., “language that is meaningless or is made unintelligible by excessive use of abstruse technical terms; nonsense.” https://en.oxforddictionaries.com/definition/gobbledygook Please rephrase.	Mining SED 19.200.110 since omitted in recent 2018 SMP draft	
681	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Industrial/commercial aquaculture should be limited/restricted in residential and natural shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							“Water enjoyment uses” must be distinguished from industrial/commercial development such as industrial/commercial aquaculture. Throughout Chapter 19.200, water enjoyment uses are lumped in with broad water related uses. Water related uses include aquaculture which in fact competes with water enjoyment uses. “Water related” should be separated out from “water enjoyment” as aquaculture is a competing use that has significant impacts to the shoreline, both recreationally and aesthetically. No fence can preclude the impacts of commercial/industrial shellfish operations on neighboring tideland properties. It would not be acceptable for one upland neighbor to dump a load of sediment on his/her neighbor’s yard.		
682	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Industrial/commercial aquaculture should be limited/restricted in residential and natural shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Definitions for water enjoyment, water related, water dependent are found in: http://apps.leg.wa.gov/WAC/default.aspx?cite=173-26-020 (41) "Water-dependent use" means a use or portion of a use which cannot exist in a location that is not adjacent to the water and which is dependent on the water by reason of the intrinsic nature of its operations.		
683	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Industrial/commercial aquaculture should be limited/restricted in residential and natural shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							(42) "Water-enjoyment use" means a recreational use or other use that facilitates public access to the shoreline as a primary characteristic of the use; or a use that provides for recreational use or aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the use and which through location, design, and operation ensures the public's ability to enjoy the physical and aesthetic qualities of the shoreline. In order to qualify as a water-enjoyment use, the use must be open to the general public and the shoreline-oriented space within the project must be devoted to the specific aspects of the use that fosters shoreline enjoyment.		
684	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Industrial/commercial aquaculture should be limited/restricted in residential and natural shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							(43) "Water-oriented use" means a use that is water-dependent, water-related		
685	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.1.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							The term “no net loss” occurs frequently in the SMP update draft. Since “no net loss” is defined in Appendix B and the County has not provided us with a copy of Appendix B, it is impossible to fully comment on this.	Drafts of the appendices have since been completed and made available to the public.	
							However, “No Net Loss”, based on Chapter 100 and usage in this document, is actually a euphemism for “No Net Gain.” The definition of “compensatory mitigation” allows for mitigation in unrelated areas. For example, a development on an acre of tideland is mitigated by a restoration project in another part of the County. There is no gain in ecological function	"No net loss" versus "net gain" is part of an ongoing discussion with this commenter group.	
686	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.1.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Additionally, if one of the main compensatory mitigation strategies is restoration in an area of Puget Sound in Thurston County, this would mean that taxpayers would be paying for “No net loss.” While the shoreline development that causes impact is for an individual/entity’s financial or personal benefit, taxpayers would be subsidizing that financial or personal benefit. “No Net Loss” is a technical term for the long understood expression: “Robbing Peter to pay Paul.” This aspect of “No Net Loss” should be specifically detailed.	Drafts of the appendices have since been completed and made available to the public. "No net loss" versus "net gain" is part of an ongoing discussion with this commenter group.	

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
687	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.1. The public and environmental organizations have a right to complete clarity on the concept of “No Net Loss,” especially when they are funding restoration projects with the idea of “improving and restoring” Puget Sound. The County must be “upfront” about the facts of “No Net Loss” (robbing Peter to pay Paul), so that individuals and groups who willingly give funds for restoration projects for Puget Sound are not misled and are made aware of the fact that they are not donating to improve Puget Sound but to maintain the status quo for someone else’s financial or personal benefit. We would advocate for an overarching “Net Gain” policy rather than a “No Net Loss” policy.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Drafts of the appendices have since been completed and made available to the public. "No net loss" versus "net gain" is part of an ongoing discussion with this commenter group.	Pending / Item for Discussion
688	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.4. We suggest this policy be re-worded to be in compliance with the Shoreline Management Act. This policy is an over-simplification that appears to distort the meaning of the Act. RCW 90.58.020 The Shoreline Management Act The legislature declares that the interest of all of the people shall be paramount in the management of shorelines of statewide significance. The department, in adopting guidelines for shorelines of statewide significance, and local government, in developing master programs for shorelines of statewide significance, shall give preference to uses in the following order of preference which: (1) Recognize and protect the statewide interest over local interest;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
689	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.4. We suggest this policy be re-worded to be in compliance with the Shoreline Management Act. This policy is an over-simplification that appears to distort the meaning of the Act. RCW 90.58.020 The Shoreline Management Act (2) Preserve the natural character of the shoreline; (3) Result in long term over short term benefit; (4) Protect the resources and ecology of the shoreline; (5) Increase public access to publicly owned areas of the shorelines; (6) Increase recreational opportunities for the public in the shoreline;	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
690	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.4. We suggest this policy be re-worded to be in compliance with the Shoreline Management Act. This policy is an over-simplification that appears to distort the meaning of the Act. (7) Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary. In the implementation of this policy the public's opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state shall be preserved to the greatest extent feasible consistent with the overall best interest of the state and the people generally. To this end uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon use of the state's shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
691	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.4. We suggest this policy be re-worded to be in compliance with the Shoreline Management Act. This policy is an over-simplification that appears to distort the meaning of the Act. (7) Alterations of the natural condition of the shorelines of the state, in those limited instances when authorized, shall be given priority for single-family residences and their appurtenant structures, ports, shoreline recreational uses including but not limited to parks, marinas, piers, and other improvements facilitating public access to shorelines of the state, industrial and commercial developments which are particularly dependent on their location on or use of the shorelines of the state and other development that will provide an opportunity for substantial numbers of the people to enjoy the shorelines of the state.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
692	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.4. Alterations of the natural condition of the shorelines and shorelands of the state shall be recognized by the department. Shorelines and shorelands of the state shall be appropriately classified and these classifications shall be revised when circumstances warrant regardless of whether the change in circumstances occurs through man-made causes or natural causes. Any areas resulting from alterations of the natural condition of the shorelines and shorelands of the state no longer meeting the definition of "shorelines of the state" shall not be subject to the provisions of chapter 90.58 RCW. Thus the SMA (Shoreline Management Act) includes a list of activities that involve “alterations of the natural condition of the shorelines of the state,” from “single-family residences and their appurtenant structures” to “industrial and commercial developments which are particularly dependent on their location on or use of the shorelines of the state”.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
693	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	C.4. Both are, according to the SMP, activities that cause “alterations of the natural condition of the shorelines of the state.” So without question, based on the SMA itself, commercial/industrial shellfish aquaculture “alters the natural condition of the shorelines of the state.” Although this is obvious to anyone who observes commercial/industrial shellfish aquaculture on the tidelands, there appears to be resistance on the part of the County to acknowledge this. Rule #4 appears to be an open door for commercial/industrial development in shoreline residential areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
694	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	120 Urban Conservancy	Change Requested	<p>B.</p> <p>“LAMIRD” (Limited Areas of More Intensive Rural Development) is an acronym defined in Chapter 100. Each acronym should be restated using the full terminology with the first instance in each subsequent Chapter.</p> <p>“UGA” (Urban Growth Area) is acronym defined in Chapter 100. It should be restated using the full terminology with the first instance in each subsequent Chapter.</p> <p>Every acronym and abbreviation in this document should follow the same re-statement in all chapters. See the following link for rationale for doing this. https://books.google.com/books?id=MOVxIFO_jqIC&pg=PA41&lpg=PA41&dq=acronyms+repeat+definition&source=bl&ots=pCg3kPI0CY&sig=h0sULKePzMeTv4OmEanHR4fx3g&hl=en&sa=X&ved=0ahUKEwi36ev28dzXAhWow1QKHQFsAwcQ6AEIzTAJ#v=onepage&q=acronyms%20repeat%20definition&f=false</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
695	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Change Requested	<p>B.1.</p> <p>We disagree that commercial/industrial aquaculture is a “lesser-intensity” use. Commercial/industrial aquaculture is also antithetical to recreational uses. The term “lesser-intensity” is not adequately defined.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
696	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Change Requested	<p>B.3.</p> <p>The term “low-intensity” is not adequately defined.</p> <p>The term “significant adverse impacts” to the shoreline is not adequately defined.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
697	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Change Requested	<p>C.1</p> <p>Change the phrase: “should not be allowed” To: “must not be allowed”</p> <p>Please define “uses of a non-permanent nature.” We can infer that this refers to commercial/industrial geoduck aquaculture, which utilizes 43,560 PVC tubes (approximately 7 miles/16 tons) per acre, in the first 2-3 years of a planting cycle that lasts 5-7 years. However it would be dishonest and unethical to categorize this as a use “of a nonpermanent nature” because the cycle is repeated indefinitely. Once the native geoducks, some alive since statehood, are harvested, that alone represents a permanent alteration to the tideland, just as clear-cutting a forest is a permanent alteration of the ecosystem (give or take several centuries.) See http://www.oregonwild.org/oregon_forests/old_growth_protection/what-is-an-old-growthforest. Since the County is issuing permits with no term of lease, when the harvest occurs, the tideland will go through the same cycle for an indefinite period of time, making commercial/industrial geoduck aquaculture a “permanent” event.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
698	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Change Requested	<p>C.1</p> <p>The term “physical and biological resources” is inadequate because “resources” in this context implies a commodity to be used for personal or corporate financial gain. The SMA specifically states that we must protect the resources and ecology of the shoreline. RCW 90.58.020 states:</p> <p>(4) Protect the resources and ecology of the shoreline;</p> <p>Change the sentence “Uses should be limited to those which sustain the shoreline area’s physical and biological resources” to “Uses should be limited to those which preserve the natural character and ecology of the shoreline.” The term “substantially degrade” is vague, nebulous and unclear.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
699	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Policy Question	<p>C.2</p> <p>How is “mitigation” defined and who decides if “mitigation” is appropriate or adequate?</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Mitigation defined throughout document, including methodologies for determining amount, found in the main SMP draft and appendices draft</p>	Pending / Item for Discussion
700	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Policy Question	<p>C.4</p> <p>What are “low-intensive, water-oriented commercial uses”? For example, industrial/commercial aquaculture is not a “low-intensive” use. The commercial/industrial shellfish industry has falsely claimed “past use” in areas where there has been no “past use.” An example of this was in the Zangle Cove permit appeal. The historian of Boston Harbor stated under oath during that appeal that there has been no historic commercial aquaculture in Zangle Cove.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
701	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Policy Question	<p>C.5</p> <p>What is the meaning of “deplete the resource?” The term “resource” implies a commodity to be used for personal or corporate financial gain. See the above comment under the Shoreline Jurisdiction heading.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
702	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	125 Rural Conservancy	Policy Question	<p>C.6</p> <p>“Aquaculture” is not defined. If what is meant is “commercial/industrial scale aquaculture,” we do not agree that this is consistent with the Program.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
703	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Policy Question	<p>Areas designated as “Natural” should not allow the commercial/industrial shellfish industry. These areas have significant limitations as to upland shoreline property usage – specifically to protect the shoreline areas from human influence. The implementation of commercial/industrial shellfish aquaculture greatly impacts the natural state of these areas. The industry should be restricted from Natural areas.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
704	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Policy Question	<p>B.6.</p> <p>The presence of endangered or threatened species should also be a part of this designation criteria. For example, a shoreline with spawning or migrating endangered, threatened or protected (herring, sand lance, etc.) species should be included.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
705	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Policy Question	C.1. Commercial/industrial geoduck operations and other intensive aquaculture methods using artificial bags and/or using 43,560 PVC tubes per acre along with canopy netting and dredging to 3 foot depth at harvest is a substantial degradation and net loss of ecological functions. It also dramatically changes the character of the shoreline. It is a commercial/industrial use. It should thus not be allowed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
706	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Policy Question	C.2. The harvest of geoducks on a commercial/industrial geoduck operation (43,560 PVC pipes planted with over 130,000 geoduck seeds per acre constitutes alteration of the said tideland because it includes harvest of any natively growing geoducks, which can live up to 168 years, before Washington statehood. These areas cannot be restored to their natural condition just as a clear-cut forest cannot be restored to its natural condition.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
707	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Policy Question	C.3. Almost all shoreline areas already have single-family residences which were built according to County land use rules in force at the time of building. This paragraph must be changed to acknowledge, allow and grandfather in existing single-family residences thus built.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
708	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	130 Natural	Policy Question	C.4. The restrictions on low intensity uses in the above paragraph, that “may be allowed” rather than simply “allowed,” are in complete contradiction to the unlimited use of the tidelands granted to the commercial shellfish aquaculture industry (dredging, plowing, rebar insertion, use of plastics, etc). Please understand what this looks like to the public, i.e., collusion, bias, preferential treatment, duplicity, etc. with and for the commercial shellfish industry. This is not in keeping with the meaning of the SMA, which was written before the advent of commercial/industrial geoduck operations and/or other shellfish operations that dramatically alter the tidelands and introduce literally tons of man-made plastics and monoculture into the environment. To borrow a phrase, “this isn’t your grandfather’s oyster farm.” http://coalitiontoprotectpugetsoundhabitat.org/wp-content/uploads/2013/02/notyour-grandfathers-oyster-farm.pdf .	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
709	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Policy Question	A. The terms “protect” and “restore” are not defined. See Clallam County Aquatic Designation (2.3) for a slightly more definitive “purpose.” “Purpose: The purpose of the Aquatic designation is to protect and restore the quality and health of marine and fresh waters and the species that depend upon them, while allowing for limited modification for water-dependent uses and public access when located in appropriate areas and developed to avoid a net loss of shoreline functions.” The term “manage the unique characteristics” is illogical. “Preserve the unique characteristics” should be used. The term “manage resources” implies a financial interest in the aquatic areas—that the aquatic areas are for commercial purposes. This appears to be an oblique reference to commercial/industrial aquaculture based on promotion of commercial/industrial aquaculture in this document.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
710	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Policy Question	A. Specifically what “resources” need to be “managed? The tideland, in its natural state, does not need to be “managed” by state agencies except for monitoring of illegal use. In this context the term “protect” is more appropriate than “manage.” There is no mention of “limited modification” (as in the Clallam County SMP draft) of the aquatic area and/or under what circumstances “limited modification” would be allowed. There is no mention of “buffers” in the Aquatic section as required by 19.200.100 Shoreline Jurisdiction Buffers necessary to protect critical areas that are located within shoreline jurisdiction as described in this program.* *- optional jurisdiction. There is no mention of “buffers” on the tidelands related to commercial/industrial shellfish aquaculture and the consequent worker trampling, sediment transport, moorage of boats and barges on neighboring tidelands and on the tideland in question.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
711	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Policy Question	C. This section should contain the same “management policy” found under Urban Conservancy. “Uses that preserve the natural character of the area or promote preservation of open space, floodplain or other sensitive lands either directly or over the long term should be the primary allowed uses.” Commercial/Industrial aquaculture utilizing 43,560 PVC pipes (approximately 7 miles/16 tons of PVC) per acre along with canopy netting, barges, boats, workers, etc. does NOT “preserve the natural character of the area or promote preservation of open space.)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
712	30-Nov-17	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	135 Aquatic	Policy Question	C.6. This section addresses over-water structures and development, but does not address underwater or periodic under-water structures and development. There should be clear constraints or prohibition on new under-water structures and development especially in areas where endangered or threatened species are present. This would include any commercial/industrial aquaculture that utilizes PVC tubes, plastic mesh tubes or any other plastic and canopy nets that are on a daily basis under water and it also include uses of barges, tractors, etc. on the tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
713	30-Nov-17	Townsend and Boston Harbor	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Dear Planning Commissioners, Please find attached our letter detailing the need for more involvement of Thurston County property owners in the Shoreline Management Plan update process and a revised time table for involvement that takes into account the complexity of the topic and the current lack of information provided by County planners. We appreciate your interest and attention to citizen involvement in this matter. Sincerely, Patrick and Kathryn Townsend	Forwarded to Planning Commission. File received and comments recorded and forwarded to Planning Commission. Items are pending further discussion.	No Action Required

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
714	9-Nov-17	Townsend and Boston Harbor	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	As we move into the comment period for the proposed Thurston County Shoreline Management Plan (SMP) update it is clear that the amount of time allotted for public participation and comment is inadequate. Discussed several scheduling changes. Dear Brad, The Department of Ecology Shoreline Master Programs Handbook, Chapter 6, Public Participation, Page 4, includes a list of stakeholders who should be invited by the County to participate in the Thurston County SMP update process. See excerpt below. Please send me a list of the organizations, entities and property owners you have invited and or/contacted about the SMP update process and their contact information along with a copy of each communication. Sincerely, Patrick Townsend	Forwarded to Planning Commission. Scheduling and timelines discussed at 2017.10.10 planning commission meeting.	Public Participation/Engagement
715	9-Nov-17	Townsend and Boston Harbor	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Dear Ms. Wilson, Your characterization of this SMP update process as open and inclusive is factually incorrect. There has not been broad participation of the public as described and recommended in the Department of Ecology SMP handbook. As far as I can tell the membership of the Science-Technology Advisory Group (now called the Regulatory Group) consists on only one non-agency representative - an employee of a commercial shellfish company. At the most recent meeting of this group concerned citizens were only allowed to observe, but not comment or participate in any way. This has violated the principle of early citizen involvement in the SMP update process and the resulting work product represents that fact. It does not have the confidence of the general public. Thurston County has access to a complete list of all shoreline property owners. We receive tax notices without fail twice a year. But we have never received communications through the mail from the county on this critically important change to the status of our shoreline and lakefront properties. The recent meeting with the Boston Harbor community was initiated by local residents and Boston Harbor Association. There are many other interested parties in Thurston County. Outreach has been woefully inadequate and trust has been lost because of this. It is time to hit the reset button. I believe it is possible to achieve a consensus on the best use of our ecologically sensitive resources here is South Puget Sound. But the current draft SMP update does not achieve this. I am hopeful that you will show the leadership needed to build trust in this process. I look forward to working with you in that regard. Patrick	Forwarded to Planning Commission. Scheduling and timelines discussed at 2017.10.10 planning commission meeting. Staff responded to initial message in e-mail discussion.	Public Participation/Engagement
716	9-Nov-17	Townsend and Boston Harbor	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Dear Ms. Wilson, Your characterization of this SMP update process as open and inclusive is factually incorrect. There has not been broad participation of the public as described and recommended in the Department of Ecology SMP handbook. As far as I can tell the membership of the Science-Technology Advisory Group (now called the Regulatory Group) consists on only one non-agency representative - an employee of a commercial shellfish company. At the most recent meeting of this group concerned citizens were only allowed to observe, but not comment or participate in any way. This has violated the principle of early citizen involvement in the SMP update process and the resulting work product represents that fact. It does not have the confidence of the general public. Thurston County has access to a complete list of all shoreline property owners. We receive tax notices without fail twice a year. But we have never received communications through the mail from the county on this critically important change to the status of our shoreline and lakefront properties. The recent meeting with the Boston Harbor community was initiated by local residents and Boston Harbor Association. There are many other interested parties in Thurston County. Outreach has been woefully inadequate and trust has been lost because of this. It is time to hit the reset button. I believe it is possible to achieve a consensus on the best use of our ecologically sensitive resources here is South Puget Sound. But the current draft SMP update does not achieve this. I am hopeful that you will show the leadership needed to build trust in this process. I look forward to working with you in that regard. Patrick	Forwarded to Planning Commission. Scheduling and timelines discussed at 2017.10.10 planning commission meeting. Staff responded to initial message in e-mail discussion.	Public Participation/Engagement
717	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	110 Purpose	Change Requested	Please provide a link to ESHB 1653. Critical Areas Act. 1990 Add “upslope”. Should read: “...except for existing upslope ongoing agricultural activities.” Existing aquaculture, but fin fish aquaculture and shellfish aquaculture should not be exempt.	Comments have been forwarded to the planning commission. Suggestions for specific edits have been taken into consideration in drafting the update. The style of this Draft has been to reference outside documents rather than import the full verbage. Pending item for discussion.	Pending / Item for Discussion
718	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	125 Relationship to Other Plans and Regulations	Change Requested	C. Please give citations for the source of this paragraph. Please give examples of a “combined shoreline permit.” Please define the term “where feasible.” Please define when a combined permit would not be allowed. For example, are there proximity restrictions to the combined permit? The language of this paragraph appears to be vague. Examples of potential problems: One lot has a salmon bearing stream, another combined lot does not. One shoreline lot has migrating salmon, another does not. One shoreline plot has strong tidal flows, the other does not. All shoreline lots vary to a smaller or greater degree. A shoreline permit should be based on the unique individual characteristics of the site. We strongly disagree with the issuance of aquaculture permits by type of use for multiple properties/land owners. Because of varying conditions, individual permit applications must be required.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Source is Thurston County Zoning Ordinance. Feasible is defined by 19.150.365 The allowance for combined shoreline permits is "encouraged for proposed activities within the shoreline jurisdiction where feasible." This allowance is only for areas that are consistent with the SMA and all other requirements of the SMP.	Pending / Item for Discussion
719	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	125 Relationship to Other Plans and Regulations	Change Requested	D. As of 11/29/17, the Appendices C and B are still not available on the County SMP website. Full comment cannot be made until these are available to the public.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Drafts of the appendices have been completed and made available to the public.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
720	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	130 Governing Principles	Change Requested	C.2 A clear definition of “no net loss on a programmatic basis” is required to make full comment. This definition would be in Appendix B, which is still not available.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Drafts of the appendices have been completed and made available to the public. From B.5.B "Programmatic mitigation options such as mitigation banking or, in-lieu fee (if available). For Thurston County, the Thurston County In-Lieu Fee program shall be utilized." Further explanation offered in Appendix C.4.D.	Pending / Item for Discussion
721	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	130 Governing Principles	Change Requested	C.3 (1) Thurston County cannot implement this policy when the county does not have knowledge of the current aquaculture projects. The fact that Thurston County does not have knowledge of all aquaculture operations in the County was provided in recent testimony by Thurston County planner, Tony Kantas, during the Jensen/Townsend vs. Sohn hearing before the Hearing Examiner. (2) If Thurston County does not have knowledge of all aquaculture operation, we question the County’s grasp and/or knowledge of other types of operations within the County that would impact ecological function. (3) To implement this policy, a complete written accounting, including but not limited to start date of operation, whether the operation is ongoing, whether the operation has a permit, who runs the operation, what types of structures are used, etc. would be required. (4) Description/definition of “exempt development” along with specific examples of “exempt development” is needed. (5) A detailed description of the existing baselines on which the County measures cumulative impact for each type of project is needed. (6) The term “development opportunities” needs definition. If there is a definition related to this term it should be cited or, preferably, re-stated within the context of this paragraph including examples. (7) This paragraph is basically “gobbledygook, i.e., “inflated, jargon-cluttered prose that fails to communicate clearly.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
722	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	130 Governing Principles	Change Requested	C.4 Please provide Appendix C so that we can provide comment.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Drafts of the appendices have been completed and made available to the public.	Pending / Item for Discussion
723	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	130 Governing Principles	Change Requested	D. Please provide detailed information/references to the relevant federal, state, local laws and other “protections.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
724	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	130 Governing Principles	Change Requested	E. Please provide examples of how the Public Trust Doctrine applies to regulatory or administrative actions. Public Trust Doctrine: https://fortress.wa.gov/ecy/publications/documents/93054.pdf	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
725	30-Nov-17	Townsend and Boston Harbor	Email	AB_Introduction_100	135 Liberal Construction	Change Requested	Please provide the County’s definitions of “strict construction: and “liberal construction.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
726	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	100 Abandonment	Change Requested	Please provide reference to the “one-year” baseline requirement. Please provide the definition of “cessation” as it relates to upland and shoreline permits.	The one year baseline requirement is established by this definition. The introduction of 19.150 establishes that the most current version of the English Webster’s Dictionary shall be considered as providing ordinary accepted meanings where otherwise not specified. Cessation here: "a temporary or final ceasing (as of action) : stop " Forwarded to Planning Commission.	No Action Required
727	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	110 Accessory Structure - View Blockage	Change Requested	There should be a “view degradation” definition for activities that are not defined under 19.150.110 but nevertheless cause view degradation to properties, such as waterfront properties, that pay taxes based in part on the “view.” Commercial operations on the tidelands would fall under this definition.	19.600.115.B.2.k. requires a visual assessment, including photo analysis / simulation of the proposed activity demonstrating visual impacts within 1,500 feet of the proposed project site. This includes the PVC tubes and netting used by Geoduck farmers, with visual analysis of visual impacts at both mean high and mean low tides.	Pending / Item for Discussion
728	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	115 Accretion	Change Requested	Accretion can occur due to activities other than wind and/or water. This should include accretion due to development activities, including commercial activities on the tidelands as well as the uplands, etc.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
729	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	120 Adaptive Management	Change Requested	How would “adaptive management” be implemented once permits are given for aquaculture activities or other activities on the shoreline? How would “adaptive management” be implemented if tideland/shoreline activities are allowed without a permit? Please give examples (including but not limited to) of activities/operations that are subject to “adaptive management.”	Forwarded to Planning Commission. 19.300 Policy SH-31: "...experimental aquaculture projects in water bodies should include conditions for adaptive management." Language is implemented to promote a continued system of observation, analysis, progress tracking, and altering methods, is conducted. Possible addition of examples to be discussed with staff, planning commission, and stakeholders.	Pending / Item for Discussion
730	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	145 Appurtenance	Change Requested	RCW 90.58.030 states development is “substantial development” and thus subject to “substantial development” scrutiny except for normal repair and maintenance of residences and their appurtenance, and repair and maintenance of bulkheads. The question is, what is regarded as “normal repair and maintenance” and who decides what is “normal repair and maintenance?” If what a homeowner needs to do is not considered “normal,” then a full-blown Substantial Development Permit process with a hearings examiner, appeal so the SHB, may be triggered.	Forwarded to Planning Commission. Normal maintenance and Normal Repair are defined in 19.150.595 and 19.150.600 respectively	No Action Required
731	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	145 Appurtenance	Change Requested	RCW 90.58.030 (e) "Substantial development" means any development of which the total cost or fair market value exceeds five thousand dollars, or any development which materially interferes with the normal public use of the water or shorelines of the state. The dollar threshold established in this subsection (3)(e) must be adjusted for inflation by the office of financial management every five years, beginning July 1, 2007, based upon changes in the consumer price index during that time period. "Consumer price index" means, for any calendar year, that year's annual average consumer price index, Seattle, Washington area, for urban wage earners and clerical workers, all items, compiled by the bureau of labor and statistics, United States department of labor.	Forwarded to Planning Commission. Normal maintenance and Normal Repair are defined in 19.150.595 and 19.150.600 respectively	No Action Required
732	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	145 Appurtenance	Change Requested	The office of financial management must calculate the new dollar threshold and transmit it to the office of the code reviser for publication in the Washington State Register at least one month before the new dollar threshold is to take effect. The following shall not be considered substantial developments for the purpose of this chapter: (i) Normal maintenance or repair of existing structures or developments, including damage by accident, fire, or elements; (ii) Construction of the normal protective bulkhead common to single-family residences;	Forwarded to Planning Commission. Normal maintenance and Normal Repair are defined in 19.150.595 and 19.150.600 respectively	No Action Required
733	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	150 Aquaculture	Change Requested	Does aquaculture include net pens? Does aquaculture include floating rafts or similar methods? The phrase, “and tribal co-managed,” was inserted by Thurston County into the Ecology WAC definition. This needs an explanation.	Forwarded to Planning Commission. Net pens are covered under 19.150.630 Predator Exclsion. Suspended Culture Systems are also covered. Confirmed that WAC 173-26-020(6) does not include "and tribal co-managed", future discussion item.	Pending / Item for Discussion
734	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	170 Best Management Practices	Change Requested	Reference should be made to the source(s) of the definition of “best management practices.” Where specifically are “best management practices defined?”	The definition of 19.150.170 defines Best Management Practices as: "those practices determined to be the most efficient, practical and cost-effective measures identified to reduce or control impacts to water bodies from a particular activity, most commonly by reducing the loading of pollutants from such sources into stormwater and water bodies." As there are many different uses and structures that have many different impacts to water bodies, there are as many different best management practices. The definition provided in the SMP is to establish that the process for selection of practices should be the efficient and effective, among potential management practices for that specific topic.	No Action Required
735	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	195 Buffer	Change Requested	What “buffers” will be required around aquaculture installations? The issue of “buffers” around aquaculture installations need to be specifically detailed in this SMP document because aquaculture installations are subject to tides, currents and lack of obvious boundaries such as fences. How will aquaculture operators guarantee that vegetation/sea life in buffers around aquaculture installations remain intact? Unlike upland areas that can be fenced, the tides and the current inevitably cause sediments from, for example, geoduck harvesting, to fall on neighboring tidelands. Since there are no fences, workers, barges, PVC pipes, netting will inevitably encroach on neighboring tidelands. This has happened in the past in Totten Inlet (Taylor Shellfish encroaching on state-owned tidelands) and lawsuits ensued.	Substantial Development Permits are required for new aquaculture activities that meet the definition of substantial development. Because aquaculture requires adjacent aquatic designation, the corresponding upland designations are used to determine permit requirements. A Conditional Use Permit is required for new commercial geoduck aquaculture but a SDP is required for geoduck aquaculture developments that cause substantial interference with normal public use of the surface waters. Aquaculture operators must also submit an operational plan (19.600.115.B.3.j-l to address water quality and ensure no net loss of ecological functions. Forwarded to Planning Commission.	No Action Required
736	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	230 Clearing	Change Requested	This definition must include “clearing” the tideland of unwanted native sea life and creatures for commercial geoduck, clam and oyster operations.	Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
737	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	240 Compensatory Mitigation	Change Requested	How does this encourage overall recovery of Puget Sound? Compensatory mitigation appears to undermine recovery of ecological conditions. Please provide citations within the WAC's that define all elements of compensatory mitigation and "no net loss." Commercial aquaculture operations on the tidelands, which cannot be mitigated on their own, are not "unavoidable" activities. Please provide citations within the WAC's that define "commercial aquaculture" as an "unavoidable" activity.	Compensatory Mitigation requires the negative impacts to shoreline ecological functions are offset by generating/restoring ecological functions. This is no net loss. While the aquaculture itself is not "unavoidable" as an industry, ecological impacts resulting thereof can be "unavoidable". The WAC does not define commercial aquaculture as an unavoidable activity, but that's not the discussion here. The discussion is about unavoidable impacts. Forwarded to Planning Commission.	No Action Required
738	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	245 Condituional Use Permit (CUP)	Change Requested	CUP's will be applied at the County to aquaculture installations and approved by ECY per this draft. The ruling by Judge Bjorgen in 2011 defines a geoduck operation, because of the tubes/nets, as a "structure" and the operations are deemed "developments" under the SMA. Does this not require a substantial development permit?	Aquaculture can require Substantial (SDPs) or Conditional Use Permits (CUPs) depending on project characteristics 19.600.105/115. Forwarded to Planning Commission.	No Action Required
739	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	250 Critical Areas	Change Requested	Please provide citations from TCC 24.45, and 24.17 and from the Critical Areas Ordinance (CAO) that refer to and/or describe any rules, exclusions and/or the relationship of commercial/industrial shellfish aquaculture and/or net pen aquaculture to Critical Areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
740	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	255 Critical Habitat	Change Requested	Please provide reference to any discussion in the SMP Update regarding Critical Habitat areas, as identified in WAC 232-12-011 and WAC 232-12-014, regarding rules, regulations and in general the relationship of "Critical Habitat" to commercial/industrial shellfish aquaculture and net pen aquaculture.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
741	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	265 Critical Saltwater Habitat	Change Requested	Commercial shellfish beds are an industrial use of aquatic habitat and are not a "Critical Saltwater Habitat," however they have previously been defined. We believe any definition including commercial shellfish beds" as critical saltwater habitat were developed before the advent of commercial/industrial geoduck aquaculture and aquaculture that utilizes plastic tubs, bags or any other man-made structures. We believe this document must distinguish the harvesting from "natural shellfish beds," from "commercial shellfish beds" that are planted. Commercially planted shellfish beds devastate critical saltwater habitats (and certainly over-harvesting does as well).	Commercial (and recreational) shellfish beds are defined as "Critical Saltwater Habitat" per WAC 173-26-221(2)(c)(iii).	No Action Required
742	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	270 Cumulative impacts or cumulative effect	Change Requested	Please provide a citation to the definition of "cumulative impacts" in ECY materials and to baseline information regarding cumulative impacts. Cumulative impacts can only be determined when there is a clear baseline. The Thurston County baseline should be included in this description, but as Thurston County does not have knowledge of all aquaculture activities (testimony by Thurston County in the Sohn hearing), it obviously has no means of determining cumulative impacts.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Currently the format of the SMP is to reference other documents rather than duplicating entire verbage.	Pending / Item for Discussion
743	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	295 Dredge	Other	The commercial/industrial shellfish industry not only frequently scrapes the beach before planting, but at harvest dredges the entire areas to 3 feet in depth. However "nicely" this has been worded, the impact exists.	Forwarded to Planning Commission. No specific request or changes.	No Action Required
744	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	305 Ecologically Intact	Change Requested	In the first sentence, in addition to vegetation this sentence should include the presence of native vertebrate and invertebrate wildlife. Vegetation is only one aspect of the ecology of the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
745	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	325 Enhancement	Change Requested	This should be "improve the natural ecological functions, if any still exist, or to attempt to recreate natural ecological functions"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
746	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	370 Fill	Change Requested	Based on aerial photos of sediment flow from geoduck harvest operations, there should be a definition of "sediment dispersal" from aquaculture operations such as geoduck harvesting. Sediment so disrupted cannot be kept off of adjoining neighbor tidelands. This would be unacceptable for upland properties.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
747	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	410 Industrial, Industrial Development	Change Requested	This definition should be labeled "Industrial Facilities" rather than "Industrial Development" which has an entirely different meaning than "Facilities." If this topic is indeed about "Industrial Development," it should include commercial aquaculture, which is an industrial development on the tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Discussion will focus on expanding the current definition, or changing the label of this item.	Pending / Item for Discussion
748	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	415 In-lieu Fee (Fee In-Lieu)	Change Requested	This should include references to "no net loss" on a site-specific basis. Some examples here are needed. There needs to be a definition of what is "preferable." This provision seems particularly susceptible to corrupt practices.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
749	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	435 Kelp	Change Requested	A clear definition related to "disputed kelp bed" is needed.	Forwarded to Planning Commission.	No Action Required
750	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	445 Land-disturbing Activity	Change Requested	Land disturbance examples should include commercial geoduck and other aquaculture on the tidelands that utilizes unnatural structures, such as PVC tubes (43,500 per acre equaling about 7 miles of PVC weighing approximately 16 tons) as well as non-natural oyster and clam bags.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
751	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	530 Low-intensity	Change Requested	Examples should be given.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
752	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	560 Mitigation Sequencing	Change Requested	E. Compensatory mitigation seems to allow for a “no net gain” in ecological function of the marine and shoreline environment. What areas would be included or excluded in the definition of “environments”? Where does this language come from? Does the County have a plan for actual improvement of the shoreline environment and if so, where is it articulated? The “Shoreline Restoration Plan” is Appendix C which is not yet published to our knowledge.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Appendix C Draft has been published and made available to the public.	Pending / Item for Discussion
753	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	560 Mitigation Sequencing	Change Requested	F. Please define “monitoring the impact” and give examples of “appropriate corrective measures.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
754	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	565 Modification	Change Requested	The PVC pipes and nets used in geoduck aquaculture have been defined as “structures.” This should be included in the examples of “modification.” https://protectourshoreline.org/thurston/SDP/110121_ThurstonCnty_HearingExaminer_Order_SDP.pdf	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Dead link as of 2018.10.17	Pending / Item for Discussion
755	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	590 No Net Loss	Policy Question	This definition of “No Net Loss” seems to be an actual “No Net Gain” provision. The definition of “Compensatory mitigation” allows for mitigation in unrelated areas. For example, I want to do development on an acre of tideland. The owner of an unrelated tideland removes a bulkhead as compensatory mitigation. There is no gain in ecological function as the benefits of the bulkhead removal are lost to the new development. If one of the main compensatory mitigation strategies is restoration in an area of Puget Sound in Thurston County, this would mean that taxpayers would be paying for “No net loss.” While the shoreline development is for someone’s financial or personal benefit, taxpayers would be subsidizing that financial or person benefit. This is an example of “robbing Peter to pay Paul.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
756	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	630 Predator Exclusion	Change Requested	“Predator Exclusion” is shellfish industry concept. “Predator exclusion” is an environmentally disruptive process of excluding wildlife from certain aquaculture installations. Such an industry definition has no place in a governmental regulation that is specifically designed to protect and preserve natural ecological conditions. It should also be noted that “predator exclusion” almost certainly includes endangered, sensitive, and/or threatened species. Further, the use of language including “Predator Exclusion” is a way of normalizing concepts that are abnormal and favors the viewpoint of a specific industry rather than the citizens of Thurston County. Are we to take our children down to the beach and see starfish and crabs and explain to them that they are “bad” because they are predators of the commercially grown geoduck? Enshrining this in county documents is unacceptable and counter-productive. “Predator Exclusion” is not a term that ordinary people use. It is a term that comes directly from the shellfish industry. It does not belong in the Thurston County SMP that is presumably written for the citizens of Thurston County and not simply to benefit the shellfish industry. The term should be changed to “Wildlife Exclusion.” This more accurately defines the meaning.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
757	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	640 Priority Species	Change Requested	B. Examples should include wild salmon and orca whales. Please provide references to the meaning of this term in WAC’s, RCW’s, Handbooks, etc.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
758	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	640 Priority Species	Change Requested	C. Species of “commercial” importance should not be included in this list because there is frequently a habitat conflict between “commercial” species and native species. Changing the balance of native species (such as in Willapa Bay and Grays Harbor) by introducing nonnative species will inevitably lead to disruption of the ecosystem. Non-native fish and shellfish should not be included in this list. For example, would nonnative Atlantic salmon be included in this list? An argument could be made that they are commercially important. But another argument can be made that allowing Atlantic salmon is a flawed strategy, outlawed in California and Alaska.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
759	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	655 Qualified Professional or Qualified Consultant	Change Requested	B. Shoreline mitigation requires professional expertise in marine biology independent from industry interests.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
760	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	655 Qualified Professional or Qualified Consultant	Change Requested	D. There should be disclosure requirements for any possible conflict of interest. This would include taking compensation from an interested party to render an opinion, or working for a company or organization which has taken compensation for an affected project or similar projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
761	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	680 Resource-based Uses	Change Requested	The term “low-intensity” is not defined. Aquaculture, particularly geoduck aquaculture using tons of PVC along with nets on the tideland is not “low intensity.” The tidelands are the “nurseries” of Puget Sound and industrial aquaculture on the tidelands has a high intensity impact.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. The entry includes examples of types, such as agriculture, aquaculture, forestry, etc.	Pending / Item for Discussion
762	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_1 50	685 Restoration	Change Requested	There should be a more comprehensive definition of “restoration”. For example, activities which negatively impact native wildlife species should not be included as a restoration activity. Additional restoration activity in one area should be the basis for justifying development in another location. Restoration should stand alone as just that—restoration.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
763	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	705 Shellfish Beds	Change Requested	In the case of disputed critical saltwater habitat, wouldn't the Army Corps of Engineers also be consulted? Also EPA, NMFS and other federal agencies?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Definition of "shellfish beds" should not combine definitions of natural and commercial shellfish beds.		
							There should be two separate definitions: "shellfish beds natural" and "shellfish beds commercial." Commercial/industrial shellfish and net-pen aquaculture cannot be equated with natural processes.		
							This definition does not appear to be in any WAC's.		
764	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	720 Shoreline Stabilization	Other	It is important to note that the harder the construction measure, the more impact on the environment and biological functions. This principle should also be applied to development and structures applied to the tidelands. For example, 16 tons of PVC pipe per acre, shellfish industry tractors on the tidelands are "hard" structural methods on the tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
765	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	765 Structure	Change Requested	Permanently moored vessels would meet this criteria, so we question the purpose of the exclusion of vessels. The definition of vessels should be modified to "except vessels moored or anchored less than seven days."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Dead link as of 2018.10.17	Pending / Item for Discussion
							PVC pipes with nets for geoduck aquaculture have been defined as a "structure." See 2011 ruling of Judge Thomas Bjorgen which defines a geoduck operation as a "structure" and a development under the SMA.		
							https://protectourshoreline.org/thurston/SDP/110121_ThurstonCnty_HearingExaminer_Order_SDP.pdf		
766	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	770 Substantial Development	Change Requested	See 2011 ruling of Judge Thomas Bjorgen which defines a geoduck operation as a "structure" and a development under the SMA.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Dead link as of 2018.10.17	Pending / Item for Discussion
							https://protectourshoreline.org/thurston/SDP/110121_ThurstonCnty_HearingExaminer_Order_SDP.pdf		
							Please include a definition for the term, "materially interferes."		
767	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	810 Vegetation, Native	Policy Question	What is the time frame for the definition of "indigenous"?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Indigenous is "produced, growing, living, or occurring naturally in a particular region". Invasive species would not be included.	Pending / Item for Discussion
768	30-Nov-17	Townsend and Boston Harbor	Email	AC_Definitions_150	825 Water-Enjoyment Use	Change Requested	The last sentence is overly restrictive. A boat launch may have a primary use of allowing recreational boats to launch on Puget Sound waters, but may have a secondary use of allowing kayakers, paddleboarders, canoers, and others to also access the sound.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
769	25-Jan-18	Townsend and Boston Harbor	Email	AC_Definitions_150	740 Shorelines of Statewide Significance	Change Requested	Dear Mr. Murphy and Planning Commissioners,	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							We have reviewed definitions in Chapter 19-100 of the Thurston County Shoreline Master Plan (SMP) Update and find that there is a significant discrepancy between the definition of "Shorelines of Statewide Significance" in Chapter 19-100 of the SMP Update and the relevant RCW 90.58.030 (2)(f). 19.50.740 (E) of the draft SMP Update should be corrected to comply with RCW 90.58.030 to exclude marine shorelands and tidelands from Shorelines of Statewide Significance as follows:		
							Under the definition 19.150.740 Shorelines of Statewide Significance, the term:		
							E. Shorelands and wetlands associated with A-D		
770	30-Jan-18	Townsend and Boston Harbor	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	110 Shoreline Environment Designations	Change Requested	Should read:	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							E. Shorelands and wetlands associated with A, C and D above.		
							One general issue we find with the current Draft SMP Update is that Thurston County has chosen to eliminate the individual goal statements for each Shoreline Designation in Chapter 19.200 and instead has defined them generally in Chapter 19.300.		
							In generalizing these goal statements, the nuances that were part of the definition of each Shoreline Environment have been lost and at least in one case, completely misstated.		
771	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	We suggest that the writers of the Draft SMP update return the Goal Statements/Policies to their rightful place as thoughtfully constructed by the original writers of the 1990 SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Although Thurston County claims it has no jurisdiction over the "High Intensity" Shoreline Environment (i.e., "Urban), the authors have nonetheless inexplicably chosen the Goal Statement for the "High Intensity" Shoreline to express the Economic Goal for ALL Shoreline Designations in Thurston County, including the Natural Environment. (19.300.120)		
772	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	This definition applies to all shoreline designations, including Natural, Rural Conservancy, Urban Conservancy and Shoreline Residential.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Are the Thurston County Planners envisioning new ports, industries, transportation, commerce, etc. along all the shorelines of South Puget Sound as "High Intensity" use?		
							The use of the term "when" indicates that if not this year, then maybe next year the Natural Shoreline will be able to "accommodate such development."		
772	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	This description has no place in the Draft SMP Update and should be stricken.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
773	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	<p>We request that the 19.300.105 to 19.300.145 goals be placed back in Chapter 19.200 of the DRAFT SMP Update and defined under each of the Shoreline Designations based on the unique characteristics of that Shoreline Designation. It is confusing to find these items in Chapter 19.300 where their relevance to individual Shoreline Designations is obscure. The 1990 SMP was exceptionally clear in its formatting and description of Shoreline Designations and Goals of each individual designation.</p> <p>Many of the Policies described under the Policy Statements in Chapter 19.300 are poorly written, vague and ambiguous. Some are superfluous and some, like the Goal under Economic Development (as described above), are inappropriate and misleading.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Review of formatting, organization, and layout conducted.	Pending / Item for Discussion
774	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	We respectfully request that the author(s) of this document be identified (as they are in the 1990 SMP) and that the County engage policy experts and professional writers to go back to the 1990 SMP and start from scratch in updating it. Citizen stakeholders should be included in this process from the beginning.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
775	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	In Section Two (General Goals and Policies) of the previous 1990 version of the SMP, “Purpose”, “Definition” and “goal statements” were delineated for each of the five specific shoreline environments. The current SMP Update lumps all the shoreline environments together related to goals. We would suggest going back to the topic format of the 1990 SMP, which delineates “Goal Statements” for each shoreline environment, because that would be more accurate, cleaner and more understandable.	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Currently, in the 2018 draft, SEDs are detailed in 19.200 with "Purpose", "Designation Criteria", and "Management Policies". Then county-wide goals and policies are detailed in 19.300.</p>	Pending / Item for Discussion
776	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	<p>SMP, overarching goal, purpose and statement of policy are stated at the beginning of this Chapter (Section Two). Though some re-wording may be appropriate, having this section in the document gives a sense of the broad objectives of the Shoreline Management Plan and we question why it was completely removed from the current version. The SMP must give a sense of the larger vision and values related to our shorelines and the use of our shorelines. This section should go back in.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
777	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	<p>19.300.00 NEW: (Actually this is from the 1990 Version of the Thurston County SMP--it should be put back in.)</p> <p>I. Goal</p> <p>The goal of this Master Program is to preserve to the fullest possible extent the scenic, aesthetic and ecological qualities of the Shorelines of the Thurston Region in harmony with those uses which are deemed essential to the life and well-being of its citizens.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.Potential reorganization/addition of 1990 content.	Pending / Item for Discussion
778	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	<p>19.300.00 NEW: (Actually this is from the 1990 Version of the Thurston County SMP--it should be put back in.)</p> <p>II. Purpose</p> <p>The local governments of Thurston County recognize that the Shorelines of the State and the Region are among the most valuable and fragile of our natural resources. There is great concern regarding their utilization, protection, restoration and preservation. In addition, these local governments find that the ever-increasing pressures to accommodate additional uses on the shoreline necessitates increased management coordination in the development of the Shorelines. These local governments further find that much of the Shorelines of the Region and the uplands adjacent thereto are in private ownership; that unrestricted construction on the privately-owned or publicly-owned Shorelines of the State is not in the best public interest; and therefore, coordinated planning necessary in order to protect the public interest associated with the Shorelines of the State while, at the same time, recognizing and protecting private property rights consistent with the public interest. There is, therefore, a clear and urgent demand for a planned, rational and concerted effort, jointly performed by federal, state and local governments, to prevent the inherent harm in an uncoordinated and piecemeal development of the Shorelines of the State and Region.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.Potential reorganization/addition of 1990 content.	Pending / Item for Discussion
779	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	<p>19.300.00 NEW: (Actually this is from the 1990 Version of the Thurston County SMP--it should be put back in.)</p> <p>III. Policies</p> <p>It shall be the policy of the local governments of Thurston County to provide for the management of the Shorelines of the State and Region by planning for and fostering all reasonable and appropriate uses. This policy is designed to insure the development of these shorelines in a manner which, while allowing for limited reduction of rights of the public in the navigable waters, will promote and enhance the public interest. This policy contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the State and their aquatic life, while protecting generally public rights of navigation and corollary rights incidental thereto.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.Potential reorganization/addition of 1990 content.	Pending / Item for Discussion
780	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	General Feedback / No Specific Section	Change Requested	<p>19.300.00 NEW: (Actually this is from the 1990 Version of the Thurston County SMP--it should be put back in.)</p> <p>III. Policies (continued)</p> <p>To implement this document, the public’s opportunity to enjoy the physical and aesthetic qualities of natural Shorelines of the State and Region shall be preserved to the greatest extent feasible consistent with the overall best interest of the people generally. To this end, uses shall be referred which are consistent with control of pollution and prevention of damage to the natural environment or are unique to or dependent upon use of the State’s shoreline. Alterations of the natural condition of the shorelines, in those limited instances when authorized, shall be given priority for single-family residences, ports, shoreline recreation uses including but not limited to parks, marinas, piers and other improvements facilitating public access to shorelines of the Region; industrial and commercial developments which are particularly dependent on their location, or use of, the shorelines of the Region; and other development that will provide an opportunity for substantial numbers of the people to enjoy the shorelines of the Region. Permitted uses of the Shorelines of the State and Region shall be designed and conducted in a manner to minimize, to the extent feasible, any resultant damage to the ecology and environment of the shoreline area and interference with the public’s use of the water.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.Potential reorganization/addition of 1990 content.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
781	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	050 Applicability	Change Requested	"A. The general goals and policies of this chapter apply to all use and development activities within the Program’s jurisdiction, regardless of environment designation. As provided in WAC 173-26-191, these policies are the basis for regulations that govern use and development along the shoreline. Some Program policies may not be fully achievable by regulatory means but may be pursued by other means as provided in RCW 90.58.240." This statement [above] is in contradiction to the 1990 SMP “goals and policies” which gave “Purpose,” “Definition” and 8 “Goal Statements” for each of four categories of shoreline environment: “Natural, Conservancy, Rural and Urban.” We question why, in terms of goals, these are all now being lumped together. For example, in the “Natural Environment” the 1990 SMP states: “Economic development is not a goal of the Natural Environment.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.Potential reorganization/addition of 1990 content.	Pending / Item for Discussion
782	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	050 Applicability	Change Requested	However, in the SMP Update, the Goal for all shoreline environments is: “Provide for the location and design of industries, transportation, port and tourist facilities, commerce and other developments that are particularly dependent upon a shoreline location and/or use, when the shoreline can accommodate such development. Who decides “when the shoreline can accommodate such development”? If it cannot accommodate this year, then maybe next year?? Again, we strongly suggest going back to the topic format of the 1990 SMP, delineating each shoreline environment separately, because it is much cleaner and more readable and understandable. If there are policies that cover all the shoreline environments, those policies can be in a “general” section.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.Potential reorganization/addition of 1990 content.	Pending / Item for Discussion
783	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	A.6. As described in our letter to Brad Murphy and the Thurston County Planners on 1/25/2018 regarding the definition of “Shorelines of Statewide Significance” in Chapter 19.150.740, number 6 of this paragraph is not in compliance with RCW 90.58.030 (2)(f). It should read: Shorelands and wetlands associated with 2 through 5 above. See Dept. of Ecology's explanation of the Shorelines of Statewide Significance, which confirms this correction. http://198.239.150.195/programs/sea/sma/st_guide/jurisdiction/ssws.html See: RCW Definitions and Concepts: Shorelines of Statewide Significance) (2)(f)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
784	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-1 What was the specific criteria used for determining statewide interest over local interest? The primary considerations that are stated in Policy SH3-2 relate to economic interest. What happened to the concept that “the public’s opportunity to enjoy the physical and aesthetic qualities of natural Shorelines of the State and Region shall be preserved to the greatest extent feasible consistent with the overall best interest of the people generally.” (See Policies, above, from the 1990 Thurston County SMP.) a. The Washington Departments of Fish and Wildlife and Ecology, affected tribes, other resources agencies, and interest groups should be consulted for development proposals that could affect anadromous fisheries or other priority species or habitats. “other priority species” should be defined, or the relevant source for defining priority species should be identified.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
785	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-2 a. What “regulations” are being referred to? What is the meaning of “administer shoreline environments?” These terms are not defined.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
786	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-2 b. • The term “natural resources of statewide importance” is not defined. • The term “diminished” is not defined. • The term “facilitated” is not define. Who should “facilitate” and how? Does this mean the County will step in? Is the County going to pay for “facilitation” and “restoration”?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
787	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-2 c. uses, such as shellfish aquaculture, to extend into low intensity use or underdeveloped areas. JV: The phrase “rather than allowing high intensity uses to extend into low intensive use” seems to be applicable to commercial aquaculture, which is a high intensity use introduced in an area of low intensity (i.e., residential) use. PT: Insert “such as shellfish aquaculture,”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
788	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-3 a. This item should be deleted as it is nonsensical under “Shorelines of Statewide Significance.” • The term “demand for economic resources” is not defined. • The term “sufficient,” is not defined. • The term “Shellfish beds” is not defined as to natural shellfish beds, commercial shellfish beds and recreational shellfish beds. • The public is not required to “preserve” land for economic use. • We question if new “navigable harbors” would be allowed on “Shorelines of Statewide Significance.” The only marine “Shorelines of Statewide Significance” in Thurston County are Puget Sound itself and the tideland/shorelands of Nisqually Reach. • Is Thurston County contemplating a new “navigable harbor” in Nisqually Reach or the middle of South Puget Sound? The public has a right to know.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
789	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-3 b. • Please define “resources.” • Please define and/or give examples of “irreversible uses.” • One example of “irreversible uses” is geoduck aquaculture, because the tideland is “clear-cut” at harvest. • Please tell us if industrial/commercial aquaculture is allowed on “Shorelines of Statewide Significance”, because again, the only marine “Shorelines of Statewide Significance are Puget Sound itself and Nisqually Reach.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
790	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-3 c. Please define terms and concepts: <ul style="list-style-type: none">• Give a specific example of “short-term economic gain”• Define “short term economic gain” and explain how it is measured.• Define “convenience of developments?”• There appears to be a specific idea of what this item is about, but the meaning is obscure. Please explain.• One example we can think of is geoduck aquaculture, which has a short term economic gain for a few companies with potentially costly clean-up and restoration efforts if the geoduck market collapses.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Short-term economic gain are boons to the local economy.	Pending / Item for Discussion
791	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-3 d. SMP Emphasis here is to “actively promote aesthetic considerations when contemplating new development..., etc.)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
792	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-3 e. [new policy added by stakeholders]: "Actively support programs which recognize the stewardship role of shoreline residential owners and promote their voluntary management of their shorelines." We agree with Thurston County Shoreline Stakeholder’s Coalition that thousands of home owners are on their properties for the long-term and support sound ecological practices.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
793	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-4 a. Define “projects” or type of projects. Point to information that qualifies which projects “are required to consider incremental and cumulative impacts, etc.” “No net loss” is simply maintaining the status quo and is a dishonest concept when officials promote taxpayer funded restoration projects to offset impacts by specific individuals or other entities. The concept that should be used is “net gain” rather than “no net loss.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. "No Net Loss" is an accurate statement of the policy. There is no net loss of the ecological functions of shorelines due to proposed mitigation requirements.	Pending / Item for Discussion
794	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-4 b. NEW/REWORD to: Ensure the long-term protection of ecological resources of statewide importance, such as anadromous fish habitats, forage fish spawning and rearing areas, natural shellfish beds, bird nesting and migration area, eelgrass, tideland sea life, and unique environments. Section 4-b is not broad enough. • Use the inserted NEW replacement wording. <ul style="list-style-type: none">• Distinguish “shellfish beds” as “natural shellfish beds.” Commercial shellfish beds are not unique.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
795	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-4 b. NEW/REWORD to: Ensure the long-term protection of ecological resources of statewide importance, such as anadromous fish habitats, forage fish Zangle Cove should be treated as a “unique environment.” Commercial shellfish beds should not be given protection in law. Commercial shellfish beds cannot logically or honestly be labeled as “unique environments.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
796	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-4 c. The meaning of the entire item is incomprehensible. <ul style="list-style-type: none">• Define the term “public access.”• The term “improvements” appears to be an error in word choice.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Public access is defined in 19.150.650	Pending / Item for Discussion
797	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-4 d. NEW: Limit commercial access where such access, such as shellfish industry tractors, barges, workers, PVC tubes, nets, plastic bags, etc. would result in a loss of shoreline ecological functions, such as in priority or sensitive habitats.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
798	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-5 b. Define term “appropriate” in the context of this policy.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
799	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-5 d. Support as feasible the potential enhancement of existing publicly owned and publicly assessable areas of the shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
800	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-5 e. Partner with other entities as feasible to increase public access to publicly owned areas of shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
801	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-6 a. Using state owned tidelands for commercial industrial aquaculture is not in the interest of public access and recreation or the interests of citizens of the state to visit public shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
802	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Policy SH-6 b. What exactly is this policy about? <ul style="list-style-type: none">• Is it referring to public or private facilities?• What is meant by “facilities for recreation use”? Give examples.• What type of “lodging” is meant?• What is being referred to as “lodging and related facilities on uplands?” (public or private hotels, private homes, retirement communities, shops, gas stations, etc)• The term “well-away” from the shoreline is so ill-defined and meaningless, that is subject to contention.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
803	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	“No Net Loss” is a concept that maintains the status quo with the undefined hope of not going backwards. The concept of “Net Gain” should be used instead and well-defined as to meaning so that stakeholders understand that the goal is to not only protect our shoreline but to restore it. Stakeholders, such as environmental organizations, should be made fully aware that their efforts are meant to balance out impacts to Puget Sound under No Net Loss, not to make significant headway in the recovery of Puget Sound. “Net Gain” should be used rather than “No Net Loss.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
804	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-7. Define “reasonable and appropriate development.” Is this referring to tideland or upland areas or both? We can reasonably say that almost all upland areas on the marine shoreline and lake shoreline have already been developed in terms of private homes. So, what is being referred to as “reasonable and appropriate development and who decides the meaning of the term? If this policy refers to tideland areas, then the term “protect and conserve” is not compatible with “reasonable and appropriate development.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
805	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-9. This is the transfer of developments (TDR) section of the county code – this concept alarms me especially when coupled with a “no net loss” philosophy. The policy is further alarming because it appears to say than any amendment now or after the fact will apply. What is the point of having a policy if it can be changed willy-nilly and who is able to effect that change?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
806	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-10. 5. This provision extends the “no net loss” philosophy beyond the impacted area to create an “offset” practice that seems to be a slippery slope. Who administers the ILF process, what is definition of “where appropriate,” and who decides appropriateness? The true meaning of this provision is that an individual, individual company or entity may benefit financially or otherwise from an allowed impact in one area to be offset by a restoration project in another area or by paying a fee. This means that benefit to that one individual or entity is being funded by taxpayers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. In-Lieu Fee details described in Appendices.	Pending / Item for Discussion
807	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-10. 6. This provision needs to be significantly strengthened with far more specificity. Who will monitor? What are the consequences/penalties for non-compliance? Specifically, which state or county department will be responsible for monitoring, who do they report to, how will citizens make reports, will the state or county be responsible for addressing and remedying complaints of non-compliance rather than leaving it up to citizens to bring lawsuits—a costly and disruptive process. I agree with the above. Further, it would be important to have a baseline measurement of the area before impacts and mitigations occur. Monitoring without a good baseline would not be meaningful or effective.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
808	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-11. 4. Species that are present in the project ... Adjacent areas that provide primary and secondary ecological	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
809	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-12. This Policy need re-wording as it is contradictory. “Toxins” and “Pathogens” belong in a different paragraph because they do not need protection, but rather protected against. Also, “Sediments” can contain contaminants and “Nutrients” can be beneficial or harmful, depending on what they are. So, we are not “protecting” all of these.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
810	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-12. 7,8,9. 7. NEW: Resident species and their interactions. 8. NEW: Migratory species and their interactions. 9. NEW: Shoreline structure	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
811	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-13.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							5.		
							The availability of baseline measurements of ecological functions and processes. Who or what Thurston County Department makes the assessment of immediate and long-term impacts, cumulative impacts, mitigations, etc.		
812	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Change the phrase “should be taken into account” to “will be taken into account.” Under Policy SH-13 as written, there is no obligation for anything to actually be taken into account and no indication of who is responsible for taking these items into account.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Policy SH-14.		
							The concept “no net loss to shoreline ecological function” should be replaced by the concept of “net gain” to shoreline ecological function.”		
813	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-14.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Since the wording in the SMP Update will impact our shorelines for perhaps 20-50 years into the future, the concept of “no net loss” is weak and cowardly. It promotes the status quo by allowing individuals and/or entities to benefit financially from impacts to the shoreline.		
814	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-14.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Since the wording in the SMP Update will impact our shorelines for perhaps 20-50 years into the future, the concept of “no net loss” is weak and cowardly.		
							<ul style="list-style-type: none">• It promotes the status quo by allowing individuals and/or entities to benefit financially from impacts to one area and have their impacts compensated for by taxpayer funded restoration projects in another area.• This mitigation offset was described by Brad Murphy, Thurston County Planner, at the public comment meetings.• Tax-payers have the right to know that their dollars are not actually going toward “Net gain” for Puget Sound but are simply compensating for someone else’s impacts, including entities which are benefitting financially from their impacts.		
815	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Policy SH-14.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							2.		
							What are the current shoreline areas designated as “Fish and Wildlife Habitat Conservation Areas”? <ul style="list-style-type: none">• RCW 36.70A.030(5) and WAC 365-190-130 require counties to establish these areas.• Certainly, most of Thurston County tidelands would fall into the definition of this type of area due to the presence of threatened, endangered, or sensitive species exist.• See WAC section (2) and (3) which requires use of best available science.		
816	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH-15.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							This section should include the shoreline tidal areas. There are native kelp, eelgrass, and other plant communities on tidelands that provide critical ecological functions and processes. These shoreline plant communities are also affected by changes to landside plant communities.		
817	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH-16.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Since the goal of this policy is to protect and preserve shoreline ecological functions, it should also apply to shorelines and tidelands.		
818	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH-16.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							“Unless approved by the Director or their designee, non-native vegetation is prohibited.” This seems extreme. Would prefer that it read “native plants are strongly preferred.”		
819	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH-16.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Most shoreline properties have been established as residential properties for decades. Will the monitors required in 19.300.105 D-6 also be the “vegetation monitors?” This could be interpreted as an “ivory-tower” ignorance toward shoreline property owners, most of whom are sincerely interested in the protection of the shoreline and the tideland.		
820	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Change Requested	Policy SH-17.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Will the monitors required in 19.300.105 D-6 also be the “vegetation monitors?”		
							How will this prohibition be enforced? There is something irrational and vindictive, possibly motivated by cultural envy, about a prohibition related to properties that have been established as residential properties for decades.		
821	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH-18.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							A. Policy SH-18 Shoreline and tideland use and development, including use by aquaculture, should minimize impacts that contaminate surface or ground water, cause adverse effects on shoreline ecological functions, or impact aesthetic qualities and recreational opportunities, including healthy shellfish harvest.		
							REWORD LAST SENTENCE TO READ; “...recreational opportunities such as recreational shellfish harvest, recreational fishing, bird and wildlife viewing, swimming, and recreational boating and all types of navigation.”		

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
822	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH-18. There must be a distinction defined related to recreation harvest of native shellfish and commercial/industrial harvest of planted shellfish. Mention of commercial shellfish should be stricken.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
823	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH-18. Should read: “Shoreline and tideland use and development, including use by aquaculture...” Shorelines are used from the waterward side as well as the upland side.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
824	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH-18. What is the definition of “healthy shellfish harvest”? Does this relate to the previous clause on “recreational opportunities”? If so it should be clarified. It is probably not needed here at all. Recommend striking “, including healthy shellfish harvest.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Notice of permit applications are provided to Washington State Department of Health in order to ensure consistency with state health regulations for shellfish harvest. Specific health regulations and measurements are available from the Washington State Department of Health.	Pending / Item for Discussion
825	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH-19. Define and address hazardous waste drained on the shoreline from roads and storm water drains.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Hazardous materials defined in RCW70.136.020	Pending / Item for Discussion
826	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Policy SH-21 There needs to be a policy statement related to water quality and commercial development of the tidelands. Commercial development of tidelands should not degrade aquatic water quality through siltation, release of toxics, disturbance and distribution of organic matter due to installation of structures or dredging, and so forth. The previous policies in the section assume water quality is onlyaffected by upland activities which leaves a large gap.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
827	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal The use of the phrase “when the Shoreline can accommodate such development” in this goal as stated conflicts with previous goal statements. Replace “when the shoreline can accommodate such development.” With “when such development represents no net loss of ecological function and processes.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
828	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal The use of the phrase “when the Shoreline can accommodate such development” also indicates that “High Intensity” development is allowed on Natural and Residential shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
829	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal Policy SH-22 and SH-23 as stated for all shoreline environments are in contradiction to and obfuscate the long-held goals of the original SMP, in which, this new goal for “economic development” was ONLY for the URBAN SHORELINE ENVIRONMENT. To understand clearly how this rule has been dramatically re-invented, please see inserts below from the 1990 SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. This comment is part of a larger discussion from this commenter group about the organization of the current draft compared to the 1990 SMP. Specifically, goals/policies/definitions for SEDS.	Pending / Item for Discussion
830	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal In Chapter 19.200.105 Shoreline Environment Designations, the SMP update claims that “Thurston County does not have any “High Intensity” shorelines within its jurisdiction, presumably because the City of Olympia is authoring its own SMP update. So, if Thurston County does not have any “High Intensity” shoreline areas then this Goal related to “High Intensity” economic development should be stricken.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Section in the current draft has since been restructured from the draft version referenced by this comment.	Pending / Item for Discussion
831	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal This Policy Goal allows for “High Intensity” shoreline use elsewhere in Thurston County. If it is the goal of Thurston County to allow and/or encourage “High Intensity” use in the Natural, Rural Conservancy, Urban Conservancy and Shoreline Residential shorelines, then the County should be explicit about that. This Goal should be stricken. Goals for the individual Shoreline Environmental Designations should be stated under each shoreline designation, as the goals are unique to the designation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Section in the current draft has since been restructured from the draft version referenced by this comment.	Pending / Item for Discussion
832	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal Below are the economic “Goal Statements” for each shoreline designation from the 1990 SMP. The economic goals for B., C., and D. are NOT the same as goals in the “urban” (“high intensity”) shoreline environment. In the Natural Environment Economic Development IS NOT A GOAL. The definition for the Urban (High Intensity) Environment is the definition that is being used in the current SMP Update for ALL the shoreline environments, including the “Natural Environment”. We do not agree that “high intensity” economic development is appropriate for any shoreline environment other than “Urban/High Intensity.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
833	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Goal 1990 Shoreline Master Plan Thurston County, Section Two, Generals Goals and Policies, C. Rural Environment, Goal Statement 1: Economic Development. Available resources should be utilized consistent with the definition and purpose of the Rural Environment. D. Suburban Environment, Goal Statement 1: Economic Development. Available resources should be utilized consistent with the purpose and definition of this environment. E. Urban Environment, Goal Statement 1: Economic Development. The goal of this element is to utilize most efficiently the limited shoreline for industry, transportation facilities, commercial and other developments that are particularly dependent upon their location on, or use of, the shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
834	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH-22 We question the “priority order” of water-dependent, water-related, water-enjoyment economic development. Where, specifically, did this come from and/or who determined this priority?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Priority Order was mentioned in the 1990 SMP draft, but that was in reference to financial means of preserving areas.	Pending / Item for Discussion
835	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH-22 This may be a useful practice for upland development, but it is not useful for shoreline development. We do not believe the saltwater Shorelines of Statewide Significance, should allow commercial aquaculture. Current commercial aquaculture installations on any Shorelines of Statewide Significance should be phased out. Commercial aquaculture is not consistent with protection of the most sensitive areas of tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
836	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH-22 The existing use of our shorelands in Zangle Cove is for residential and recreation use – not for commercial use.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
837	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH-23 The Washington Shellfish Initiative is a political initiative and not law. It is inappropriate to include references to the WSI in the SMP. This policy statement should be deleted.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
838	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH-23 Remove the words “should be encouraged.” Change to “Should be permitted only after careful review...”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
839	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	Policy SH-23 “No net loss of shoreline ecological functions” should be change to “net gain of shoreline ecological functions” with full definition of the meaning of “net gain.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Commenter brings up previous commenter discussion on rephrasing "no net loss" to "net gain"	Pending / Item for Discussion
840	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	125 Historic, Archeological, Cultural, Scientific and Educational Resources	Change Requested	Goal: “Property owners” are included in this section. As property owners, we are seen as equal stakeholders in the process, along with government entities and tribes. This is justification for inclusion on the STAG or Regulatory Committee.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. STAG and Regulatory have since been decommissioned.	Pending / Item for Discussion
841	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	125 Historic, Archeological, Cultural, Scientific and Educational Resources	Change Requested	Goal: How does this goal translate into regulatory action? There does not seem to be any implementation of this goal in subsequent chapters. There needs to be a definition of “coordination and consultation”. How are disputes resolved related to value or significance?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
842	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	125 Historic, Archeological, Cultural, Scientific and Educational Resources	Change Requested	Policy SH-25 What is the definition of “maximum protection”?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
843	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Goal: Of the 13 Policies listed under this heading, 8 Policies, well over half, are for the benefit or related to one industry—shellfish aquaculture industry. This is not appropriate. We question if this SMP update gives such preference/benefit to any other commercial industry and if not, where should they go to get inline? The obvious preference/benefit to the shellfish industry appears biased, especially as the other 5 polices are restrictive of upland use, and none of the policies speaks to recreational use of the shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
844	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	This goal is vague and contradictory and in conflict with previous goals. You can preserve, or you can develop, but you can’t do both. What is the definition of “orderly balance of uses”? The sentence has no meaning.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
845	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	The Goal of this policy speaks of the “orderly balance of uses.” But the only specific uses mentioned are single family residential use (SH-27), non-forming structures (SH-38) and shellfish aquaculture, (SH-30, SH-31, SH-32, SH-33, SH-34, SH-35, SH-36, Sh-37) It begins to look significantly unbalanced.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
846	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-26 “No net loss” should be replaced with “Net Gain” and with full definition of “Net Gain.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Commenter brings up previous commenter discussion on rephrasing "no net loss" to "net gain"	Pending / Item for Discussion
847	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-26 Since most upland parcels on the shorelines of Thurston County are single-family homes which have existed for decades, we question what this Policy is about. If it is talking about inland “plats and subdivisions,” that are not on the shoreline itself, the policy should state that explicitly.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
848	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-26 There needs to be a definition of “sustainable and low impact development practices”. What characterizes these types of development?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Low Impact Development defined in 19.150.525	Pending / Item for Discussion
849	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-27 Preference is to “water-dependent uses and single family residential uses...”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
850	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-27 Why are water-enjoyment uses secondary? The recreational use of aquatic waters has a high economic value and attraction to more people in Puget Sound.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
851	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-28 Questions • Who designates “appropriate area for protecting and restoring shoreline ecological functions, etc. and on what basis? • Who maintains “appropriate areas for protecting and restoring shoreline ecological functions,” etc.? • Does this apply to public land/tidelands only? • Is private property subject to designation?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
852	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-28 Water and tides to not stop at arbitrary boundaries. How will cumulative and secondary impacts be accounted for in this policy?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
853	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-29 According to recent studies, the ability to determine and monitor for loss of shoreline ecological functions requires detailed analysis of existing ecological functions (a baseline), and regular monitoring. As Thurston County has acknowledged in testimony, it does not know how many aquaculture operations are currently active, they have no ability or resource to monitor activities. How will this policy be implemented? Baseline analysis must be required.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
854	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-29 Shoreline stabilization” and “Shoreline ecological functions” are very different concepts. The term “Shoreline stabilization” is explanatory. “Shoreline ecological function” is vague and needs to be defined.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
855	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-30 Property managed, it (aquaculture) can result in long-term, over short-term benefit and can protect the resources and ecology of the shoreline.” I don’t believe this is a scientifically defensible position. “Aquaculture...is a preferred use...” Should read: “Aquaculture...is a permitted use...”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
856	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-30 Please cite where these statements come from--WAC’s, RCW’s, etc. The statement that “Aquaculture is of statewide interest” is readily found in documents put out by the shellfish industry It sounds like a case of “if you say it often enough, it becomes true.” This is a strategy of politicians and should not be a strategy for creating common-sense rules related to protection of State shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. The 1990 SMP states that aquaculture is a component of economic development, and a viable shoreline use. Section Three - Policies and Regulations for Use Activities II. Aquacultural Activities C.7. " Due to the importance of aquaculture to the Thurston County economy..."	Pending / Item for Discussion
857	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-30 In addition to Jean’s comments, I would like to understand the basis in law for the statement that “Aquaculture is of statewide interest.” I would like to see the science behind the statement that it can provide long term benefits. Current practices have only been in use for a short period of time. The 19 economic benefits of aquaculture in Thurston County are of minimal economic benefit (about \$20M a year for geoduck farming, according to industry estimates. This is about the economic impact of 4 MacDonald’s restaurants. According to Earth Economics the recreational value of the tidelands is far higher. I see no basis for this being a part of the SMP policy structure.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
858	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-31 Add "adjacent land use" in the first sentence list.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
859	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-31 The term “adjacent land use” should be defined. Which “adjacent lands” cause restriction for aquaculture?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
860	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-31 This Policy should be stricken as it is counter to the goals of the SMP. This policy is a disaster waiting to happen. Please recall the 2015 Seattle Shellfish disastrous use of plastic cups as wild-life exclusion devices next to Tolmie Park. The owners of Seattle Shellfish only cleaned up this mess (thousands of pieces of plastic shards from the cups) when he was reported by a neighbor to the Thurston County Health Department. Thurston County should assess if this is still a problem two years later. This was “experimental technology” if you wish to call it that, but it should have been obvious to the operator that flimsy clear plastic cups, the type that are a dime a dozen at the grocery store, are not appropriate to be used to protect geoduck seeds on Puget Sound tidelands, with tides, waves and current. “Due Consideration” is obviously not something that can be counted on to be performed in thought or deed by a shellfish industry operator.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
861	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-31 The County must be liable for the permit that it gives to the operator, and so it must have a record of the method used and would wisely be cautious about “experimental methods.” Permission to “experiment” on our “fragile tidelands” should NOT be granted by law. Somebody needs to wake up here.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
862	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-32 “Long-term beneficial use of the shoreline” should be defined. Does it mean “public benefit” or “private economic gain?”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
863	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-32 This policy is contradictory. Aquaculture by its nature changes and disrupts the shoreline ecological functions and processes. This should be changed, or the entire policy eliminated.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
864	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-32 The phrase “maintains shoreline ecological functions and processes” should be defined.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
865	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 In above sections kelp is included as well as eelgrass. This should be consistent.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
866	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 In addition to water-dependent uses this should also include water-related and water-enjoyment uses.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
867	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 Why is the sentence starting “Aquaculture is not required to protect state-listed noxious ...” in this policy? That would be regulatory in nature, and best left to state agencies, not local specification.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
868	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 Comments: <ul style="list-style-type: none">• What are “applicable agency standards?”• Who defines “applicable agency standards?• What agency oversees the use of pesticides in Puget Sound and lakes?• How will the County monitor use of pesticides and who will monitor?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
869	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 Comments: <ul style="list-style-type: none">• This policy gives County permission to the Shellfish Industry to spray pesticides on Puget Sound waters. Does this include Imidacloprid, the bee-killing pesticide banned in other countries?• The phrase “Aquaculture is not required to protect state-listed noxious weed species” is covert way of saying that the Shellfish industry can spray whatever it wants on weeds and critters (ex. Native burrowing shrimp).• This type of phrasing is dishonest. The County should say directly what it means. Otherwise, it is obvious the County is attempting to hide the truth.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
870	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 Comments: 1. Projects that are not likely to negatively impact critical saltwater habitats. Change to “Project that will not negatively impact critical saltwater habitat.” Science should be applied here, not guesswork based on “not likely.” Who decides what is “not likely?”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
871	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 Comments: 2. Projects that involve little or no substrate modification. This would rule out geoduck operations. Define the term “little”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
872	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-33 Comments: 3. Projects that involve little or no supplemental food sources, pesticides, herbicides or antibiotic application.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Any project that involves supplemental food sources, pesticides, herbicides or antibiotics applications should be banned. We are in the 21st century guys. We’ve used enough of this stuff to fill every human being to the brim. We don’t need any more. Operators who are not smart enough to figure out how to grow their product without pesticides, herbicides and antibiotics should find another job. They are helping to ruin our planet and the County should reject this. The County and the State should be ashamed to even consider this in their rules that will be in effect for the next 25-40 years.		
873	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Supplemental food sources, pesticides, herbicides, anti-biotics must be banned from use in Thurston County waterways.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Policy SH-34: A.		
874	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Due to the sensitive nature of shorelines and tidelands, aquaculture facilities should be located in upland facilities with appropriate water quality controls.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Policy SH-34: B. Non-native species should be banned. Any operator who inadvertently introduces non-native species should have permit removed. The introduction and establishment of non-native species is not allowed. The term “significant ecological impact” should be defined. How is “significant ecological impact” determined in a permit process and who monitors “significant ecological impact?”		
875	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-34: C.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Remove the word “significant.” The County cannot assume to be arbiters of significance of aesthetic impact, especially when they are charging property owners the highest of property taxes because of aesthetics.		
876	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-34: C.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Who decides what is a “significant impact to the aesthetic qualities of the shoreline? How is this determined?		
877	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-35: The term “Existing shellfish areas” must be defined. Does it mean “native shellfish areas” or “commercial/industrial shellfish areas.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Policy SH-35: The term “properly managed” must be defined. There are already rules in place for sewer systems and septic systems for upland properties. What else is required here? This policy should be restated if the meaning is for taxpayers to subsidize a single industry. That would be precedent setting for other industrial uses to take priority over family homes and properties		
879	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-35: This is far too broad. This policy could lead to a cessation of all residential and commercial development activity in Thurston County. Where is this policy required by the SMA or relevant RCWs and WACs? This looks like a lobbyist’s dream to transfer water quality recovery costs to the public. This policy should be deleted.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Policy SH-36: This is regulation and not policy. It does not belong in this section. It also looks like the work of a lobbyist and is not appropriate here.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
881	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-36: Should read “Planting and harvesting by boat shall be required...” It already says, “where feasible.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Policy SH-36: Harvesting by boat shall take place only during daylight hours when the operation is within 2,500 feet of a residence or residential neighborhood.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
883	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-37: “Non-commercial and small-scale aquaculture projects” are not the same. All commercial aquaculture operations, big or small, must be required to go through the same permitting process.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							They should NOT BE EXEMPT FROM PERMITTING.” This policy is a “slippery slope”, no doubt purposefully promoted by the shellfish industry, to slip through an exemption clause for commercial shellfish aquaculture permits.		

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
884	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-37: It would appear that this policy and other policies in this section related to shellfish aquaculture are politically motivated policies from the commercial aquaculture industry and/or their representatives, proposed as a means to avoid permitting requirements. Any such policy should be eliminated from the Draft SMP Update.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
885	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-38: Sounds like war on the single-family dwelling. It conflicts with giving preference to single family dwellings. What is the basis for this type of permit? If it is a current policy, where specifically is it defined. Or is this intended to be a new policy, and if so who is responsible for defining it?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. The policy allows more flexibility for single-family dwellings.	Pending / Item for Discussion
886	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-38: “...to the maximum extent possible, remove the structures completely from critical areas, their butters, and setbacks.” The strength of this statement is of real concern.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
887	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy SH-38: Since geoduck PVC plastic and netting is recognized in regulation as a “structure” they should be included in the category of “non-conforming” and subject to the same regulations	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Non-conforming for the purpose of the SMP (and as it appears in other Washington documents) concerns structures that were conforming, then new regulations were passed.	Pending / Item for Discussion
888	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Goal: Change “...processes are protected...” to “...processes are balanced and protected...”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
889	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-39: Industrial/commercial aquaculture interferes with the public’s use and enjoyment of the water.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
890	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-39: A portion of the verbiage from policy SH-39 comes from the 1990 SMP. However, in the 1990 document this verbiage was part of the over-all policy statement regarding the SMP, the “Bigger-Picture” as it were. It was not limited to public access and recreation. It was part of a larger statement regarding the management of the Shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
891	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-39: A portion of the verbiage from policy SH-39 comes from the 1990 SMP. However, in the 1990 document this verbiage was part of the over-all policy statement regarding the SMP, the “Bigger-Picture” as it were. It was not limited to public access and recreation. It was part of a larger statement regarding the management of the Shorelines.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
892	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-39: So, although they used some of the words from the 1990 SMP, the authors of the Draft SMP Update have taken this verbiage out of context and changed the meaning. While the original version placed an emphasis on preserving the public’s rights, the new policy places emphasis on “balancing shoreline use and development” and “minimizing” interference with the public’s rights.” Since this is a change in the over-arching goals of the SMP, it needs to be specifically clarified as to intent.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
893	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-39: 1990 SMP, Section Two, General Goals and Policies, III Policies: “To implement this document, the public’s opportunity to enjoy the physical and aesthetic qualities of natural Shorelines of the State and Region shall be preserved to the greatest extent feasible consistent with the overall best interest of the people generally. To this end, uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment or are unique to or dependent upon use of the State's shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
894	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-39: Alterations of the natural condition of the shorelines, in those limited instances when authorized, shall be given priority for single-family residences, ports, shoreline recreational uses including but not limited to parks, marinas, piers and other improvements facilitating public access to shorelines of the Region; industrial and commercial developments which are particularly dependent on their location on, or use of, the shorelines of the Region; and other development that will provide an opportunity for substantial numbers of the people to enjoy the shorelines of the Region. Permitted uses of the Shorelines of the State and Region shall be designed and conducted in a manner to minimize, to the extent feasible, any resultant damage to the ecology and environment of the shoreline area and any interference with the public's use of the water.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
895	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-40: What specifically is this referring to. The language in this policy is vague and ill-defined.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
896	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-40: This should extend to require access buffers in commercial shellfish areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
897	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-41: What specifically does this policy mean. The language in this policy is general, vague and ill-defined.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
898	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-41: What is meant by “comprehensive and prioritized manner?” This is general, vague and illdefined.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
899	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-42: “Publically” is misspelled. There is a fair amount of mis-spelling in this document that could be easily remedied by using the spell-checker function in Microsoft Word.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
900	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	135 Public Access and Recreation	Change Requested	Policy SH-42: This sounds nice, but the first step is a list of such “publicly owned, undeveloped roadends, tax-title lands and rights-of-way.”.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
901	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Goal: In many instances, it would be far more effective and less costly to simply not degrade the shoreline, particularly the tidelands, in the first place. To this end, the permitting of geoduck aquaculture and other forms of commercial industrial aquaculture that uses some 43,560 PVC pipes per acre, about 7 miles of PVC weighing some 16 tons, many of which escape from their location, or otherwise use plastic nets and bags should be banned.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
902	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Policy SH-44: We agree that we should embark on restoration and enhancement programs for our shorelines. But if this is an aspect of the “no net loss of ecological function” or even an adjunct to the “no net loss” policy, it is critical that those participating in these programs should be advised of this policy and what it means—that their efforts are in effect making up for impacts of others who impact for financial gain.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
903	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Policy SH-44: All shorelines restored under an incentive program should be placed into conservation status and any development of the tidelands should be prohibited.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
904	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Policy SH-45: We agree that we should embark on restoration and enhancement programs for our shorelines. But if this is an aspect of the “no net loss of ecological function” or even an adjunct to the “no net loss” policy, it is critical that those participating in these programs should be advised of this policy and what it means—that their efforts are in effect making up for impacts of others who may impact for financial gain. If it is not part of the “no net loss” policy, then where does it fit into the scheme of “no net loss” policy?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
905	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Policy SH-46: This is a well-meaning goal that is contradicted by allowing industrial shellfish aquaculture on the tidelands using approximately 7 miles/16 tons of PVC and plastic netting to create a monoculture. Citizens who aware of the contradictions of the County policies are less likely to support restoration projects, as restoration projects often use taxpayer money.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
906	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	140 Restoration and Enhancement	Change Requested	Policy SH-47: Define “resiliency of habitats and species”. What is the relevant section of SMA, RCWs, WACs, or TCCs? How does this relate to no net loss of ecological functions and processes?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
907	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-49: This Policy is not clearly written. Define “Parking facilities” and “in shorelines.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Parking facilities given as an example of the definition for Transportation in 19.150.780	Pending / Item for Discussion
908	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-53: 2. Define what types of “existing transportation corridors and utility facilities” that “improve shoreline ecological functions.” Give an example, as this seems completely contradictory. Maybe the writer has something in his/her mind, but the reader is not a “mind reader.”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
909	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-53: [Unavoidable adverse impacts shall be mitigated] How or in what manner will “transportation corridors and utility facilities that cause impacts to the shoreline be mitigated? This is another case of contradictory policy that needs explanation. Looks like somebody just threw this in there.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
910	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-54: 1. There are many aspects to protecting the marine resource. Water quality is an important aspect, but it is one of many. Protection of endangered, threatened and sensitive species, preservation of native tideland vegetation, preservation of tideland structure, and so forth, should be added to this section.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
911	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-55: 2. What specifically is the meaning of “statewide interest vs. local interest?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. 19.300.100: "The Shoreline Management Act designated certain shoreline areas as shorelines of statewide significance. Shorelines thus designated are important to the entire state.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
912	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-56: The AHSS lacks representation from mid-sound, upper-sound, and island counties. Puget Sound is connected across all of these areas. Additionally, AHSS lacks representation of environmental organizations, citizen groups, recreational groups, shoreline property owners, and other stakeholders.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							It is an inappropriate resource for policy guidance.		
913	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-56: The AHSS may be a reputable organization, but it does not seem wise to name any nongovernmental organization in a set of rules that may be in effect for 30-40 year	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
914	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-57: The scope of public interest far exceeds this defined group. This policy should be more expansive and inclusive, or eliminated.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. SH-57 states that the scope of the public interest includes "all residents of the state".	Pending / Item for Discussion
915	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-57: <ul style="list-style-type: none">• “Natural character” of what?• “Future development” of what?• What specific policy are you attempting to convey?• This “policy” appears to be an opinion regarding public interest rather than a policy.• Are you using the term “public interest” to describe a generic group of people that include “all residents of the state, tribes, the four county governments, and federal and State-owned lands.”? If so, the “federal and State-owned lands” are not people. OR Are you trying to say that the public is interested in “all residents of the state, tribes, the four county governments, and federal and State-owned lands,” in which case “federal and State-owned lands” works, but nothing else does in the sentence?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Per SH-55 and SH-57, future development refers to the continued growth of South Puget Sound	Pending / Item for Discussion
916	30-Jan-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Change Requested	Policy SH-57 is both ill-defined and contradictory. It says that “the public interest in South Puget Sound concerns the natural character and the future development.” This is not a policy, but an ill-defined opinion. If the County is trying to say its policy is to preserve the natural character of the shoreline related to future development then it cannot, at the same time, promote policies that encourage industrial activity on the tidelands that use approximately 7 miles/16 tons of PVC along with plastic netting per acre of tideland along with dredging of the entire acre at harvest.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							We request that this “policy” be clarified. There must be consistency of policy statements and assertions of “concern” if the County wants this Draft SMP Update to be accepted as credible.		
917	10-Feb-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	We questioned the following policy: Policy 19.300.130 SH-31 Potential locations for aquaculture activities are relatively restricted by water quality, temperature, dissolved oxygen content, currents, adjacent land use, wind protection, commercial navigation, and salinity. The technology associated with some forms of aquaculture is still experimental and in formative states. Therefore, some latitude should be given when implementing the regulations of this section, provided that potential impacts on existing uses and shoreline ecological functions and processes should be given due consideration. However, experimental aquaculture projects in water bodies should include conditions for adaptive management. Experimental aquaculture means an aquaculture activity that uses methods or technologies that are unprecedented or unproven in Washington.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
918	10-Feb-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy 19.300.130 SH-31 This policy gives carte blanche to the shellfish industry to use unproven and unregulated methods on the sensitive tidelands of Puget Sound. It is both stunning and inexplicable that the County should not only allow but promote the industrialization of our tidelands while placing so many restrictions on other entities and individuals. The policy should be stricken in its entirety from the SMP Update for Thurston County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
919	10-Feb-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Policy 19.300.130 SH-31 Just as the lack of foresight related to net pen farming in Puget Sound resulted in disaster, the concept of pre-approved experimentation with unprecedented and unapproved technologies in Washington State waters is a recipe for disaster.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							To support our contention at the meeting that this policy is neither appropriate nor intelligent we cited the example of the 2013-2016 Seattle Shellfish use of “experimental” plastic cups as wildlife exclusion devices on a geoduck operation on the tidelands adjacent to Tolmie State Park on Nisqually Reach.		
920	22-Feb-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Not Net Loss: At the first Boston Harbor stakeholder meeting in October of 2017, we questioned the policy of No Net Loss. Brad Murphy explained that No Net Loss involves two aspects: <ul style="list-style-type: none">• Project No Net Loss. Mr. Murphy described “mitigations” as providing No Net Loss on specific projects, such as an industrial geoduck aquaculture operation.• Programmatic No Net Loss. Mr. Murphy described trading one development project in one part of the County for a restoration project in another part of the County as providing overall No Net Loss. It was obvious at the time that Mr. Murphy described this concept that it is unworkable. We have consistently commented on this.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
921	22-Feb-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Not Net Loss:</p> <p>(2) Second, this policy means that development interests receive financial benefit for their impacts while taxpayers must fund the restoration. Restoration projects are lauded by the public, but this is because the public believes the rhetoric about “restoring” Puget Sound, when under No Net Loss, there is no actual gain through restoration, there is simply an attempt to compensate for the impacts elsewhere. We have now been made aware of a body of literature that confirms that the policy of No Net Loss doesn’t work and that compensating through biodiversity/development barter is an illusion that works politically, but not actually.</p> <p>We suggest that County personnel, the Planning Commissioners and members of the Regulatory group all read the attached 2009 Walker paper, “Why bartering biodiversity fails.”</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
922	22-Feb-18	Townsend and Boston Harbor	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	<p>Not Net Loss:</p> <p>(1) First, the contention that “mitigations” for geoduck operations achieve “no net loss” lacks common sense at best. Installing approximately 7 miles/16 tons of PVC pipe on an acre of tideland, planting a monoculture of approximately 130,000 geoduck seeds per acre and harvesting all existing geoduck (they can live up to 168 years) along with planted geoduck using water jets up to 3 feet in depth, dramatically changes the ecology of the tideland. Any attempt to say that “mitigations” make up for this defies both logic and intelligence.</p> <p>We suggest that County personnel, the Planning Commissioners and members of the Regulatory group all read the attached 2009 Walker paper, “Why bartering biodiversity fails.”</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
923	12-Sep-18	Townsend and Boston Harbor	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	We request that you reset the process and do it the right way. You've bypassed a critical part of the process.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Issues raised and discussed with Planning Commission, new strategies, outreach, and schedules are being developed.	Public Participation/Engagement
924	6-Dec-17	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	<p>Ecology Handbook, Chapter 6, "Public Participation"</p> <p>The coalition provided a scan of chapter 6 to emphasize the role of public participation in developing the SMP.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
925	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Logistics	<p>Comments to the Planning Commission that the SMP update process is fundamentally flawed for a number of reasons.</p> <p>Request for Planning Commission to "blow the whistle" on the public participation process.</p>	Updated public engagement operations discussed at Planning Commission 2018.10.10.	Public Participation/Engagement
926	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Logistics	1. Concern that shellfish industry representative is a member of the regulatory committee and no representation from citizen groups. Suggest immediately include a citizen representative on the regulatory committee.	Regulatory committee disbanded. Forwarded to Planning Commission.	No Action Required
927	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	2. Concern by lack of effort in reaching out to property owners to participate in the SMP update process.	Updated public engagement operations discussed at Planning Commission 2018.10.10.	No Action Required
928	6-Dec-17	Townsend	Planning Commission Meeting	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Other	3. Concern over the residential setback of 200 feet but perceived "giving away tidelands" for commercialization by the shellfish industry.	Item under continued discussion with residents and Planning Commission.	Pending / Item for Discussion
929	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	4. Concern over County statements that likened the citizen community meetings to the regulatory committee meetings.	<p>Regulatory committee disbanded</p> <p>Updated public engagement operations discussed at Planning Commission 2018.10.10.</p>	No Action Required
930	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	5. Appreciate extension of time for citizen participation, require clarity on new schedule. Confusion about equating citizen meetings and regulatory committee meetings.	Regulatory committee disbanded. Forwarded to Planning Commission.	No Action Required
931	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	6. Concern that community meetings once every two months is too long a time. Request that community meetings are made parallel to the regulatory meetings.	Regulatory committee disbanded. Forwarded to Planning Commission.	No Action Required
932	6-Dec-17	Townsend	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Other	7. Concern over fairness between 200 feet landward buffer for citizens while "carte blanche use" to shellfish industry on the tidelands.	<p>Item under continued discussion with residents and Planning Commission.</p> <p>Aquaculture, when consistent with the SMP, may be allowed in.</p> <p>Aquaculture does not require a Substantial Development Permit if the development meets the exemption criteria at Section 19.500.100C.</p>	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
933	6-Dec-17	Townsend	Planning Commission Meeting	AB_Introduction_100	110 Purpose	Change Requested	10. Recommend the SMP use the explicit quote from the SMA for objective, ex/ use "...uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon use of the state's shoreline."	Item under continued discussion with residents and Planning Commission. Part of a larger proposal to update 19.100.110 to a larger, more expansive section.	Pending / Item for Discussion
934	6-Dec-17	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	11. Concern on name change from "Science Technical Advisory Committee (STAG)" to the "Regulatory Committee".	STAG disbanded. Forwarded to Planning Commission.	No Action Required
935	30-Jan-18	Townsend	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Attached 19.300 changes e-mail.	Senior Planner Responded and incorporated information into Planning Commission meeting. Comments from the attached 19.300 changes recorded and developed for further discussion.	No Action Required
936	8-Nov-18	Meredith Rafferty	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Questions on Schedule and Logistics	Staff responded, answered Q's, integrated into research. Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
937	19-Nov-17	Meredith Rafferty	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Change Requested	Request that the setback remain at 50 feet for the Boston Harbor Shoreline Residential area in consideration of: The community is densely populated. Development impacts are reduced by its ULID services Little opportunity for new development to be guided by any new setbacks. The area consists of many residential lots which were platted in the 1800s.	Staff responded, answered Q's, integrated into research. Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
938	26-Nov-17	Steve Schulte	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Question on schedule for 2017.11.30	Senior planner responded. Forwarded to Planning Commission.	No Action Required
939	26-Nov-17	Steve Schulte	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Which of those code sections is really controlling (19.400.120.B or 19.400.135 (View Blockage)), because they appear to have different buffer requirements and calculations.	Senior planner responded. Forwarded to Planning Commission.	No Action Required
940	2-Nov-17	Doug Karman, resident of Lacey, President Long Lake Association.	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Questions on Schedule and Logistics for STAG meetings. Request for extended time to review the SMP draft.	Senior planner responded. STAG disbanded. Forwarded to Planning Commission.	No Action Required
941	15-Nov-17	Eric Casino	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	115 Shoreline Residential	Policy Question	Question on the number of undeveloped properties around Boston Harbor (among those designated as Shoreline Residential). Concerns about pushing setbacks farther from the water in SEDs of Shoreline Residential, no matter the body of water they are near.	Senior planner responded and integrated question into research for Planning Commissions. Forwarded to Planning Commission.	No Action Required
942	21-Nov-17	Maria Fulton	Email	AA_General_Feedback	General Feedback / No Specific Section	Policy Question	Does this new program apply to rivers? Such as those properties along the banks of the Deschutes river?	Senior planner responded. Forwarded to Planning Commission.	No Action Required
943	21-Nov-17	Linda Hoffman	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Hello Brad, Could you please tell me the agenda and format for the public meeting on Thursday on the SMP revisions? I read that the workshops would be on specific topics and wondered what topic(s) this one would cover. Thank you Linda Hoffman	Senior planner responded with agenda and incorporated feedback into discussion with PC. Forwarded to Planning Commission.	No Action Required
944	10-Nov-17	Richard Thompson, Boston Harbor Association	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Logistics	1. Extend the review of the first two chapters. 2. We are hampered in our review because the draft document is incomplete 3. The County needs to notify by mail every property owner in the county potentially affected by the Shoreline Master Program.	Review has continued, drafts of appendices have been made available to the public. Forwarded to Planning Commission.	No Action Required
945	23-Jan-18	Kathy Knight, Boston Harbor	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	My concern: Geoduck Farms on residential beaches in front of long time residential homes. You cannot have "no net loss" of ecological function when you convert many acres of sandy beach, a nursery for salt water creatures, into a hard structured plastic/metal farm covering acres of natural estuarine shore.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
946	23-Jan-18	Kathy Knight, Boston Harbor	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	<p>My concern: Geoduck Farms on residential beaches in front of long time residential homes.</p> <p>The issue of our beaches being turned into a large seafood-industrial-compelx, in effect, Chesapeakeing the South Sound, needs to be more carefully monitored, not less.</p> <p>Back to page 1, paragraph 4 and the reference to "a combined shoreline permit is encouraged for proposed activities within the shoreline jurisdiction". I understand this to state that Thurston County would proposed to offer a "blanket permit" for farming in an area and the adjacent homeowners (shoreline owners) could in future be faced with fragmented and collective farms without the requirement for individual farm permit or any County or State oversight.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
947	Unknown	Unknown	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	What was wrong with the original? It used gobbledygook language. There is no Quality Control in palce to determine if the County is obtaining its objectives. There is no measurement of success. The only enforcement power you really have is at the permitting process. You have no effective level of enforcement after the fact.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
948	Unknown	Unknown	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	Receiving a draft version of the whole sooner than later can help to alleviate concerns over how and what will be amended.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Whole draft is available including appendices	Public Participation/Engagement
949	6-Dec-17	Townsend	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	"Why bartering biodiversity fails" Susan Walker.	Research received and incorporated information into Planning Commission meeting materials. Article on challenges of mitigation strategies.	Pending / Item for Discussion
950	10-Oct-18	Townsend and Boston Harbor	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	<p>Article on the potential harm of plastics entering coastal waters. 4/8/2018 "Heavy Metal: The New Toxic Danger Posed by Ocean Plastic Trash" by Danielle Beurteaux. Commenters concerned about plastic from Geoduck aquaculture impacting environmental health.</p> <p>Academic Article "Macro and micro plastics sorb and desorb metals and act as a point source of trace metals to coastal ecosystems"</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Academic Article read and information received.	Public Participation/Engagement
951	10-Oct-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	Scan of Thurston County's "Our Vision Our Mission" placard. Concerned about perceived lack of transparency.	Image received . Forwarded to Planning Commission.	No Action Required
952	10-Oct-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	<p>Concerns:</p> <p>New SMP Timeline</p> <p>No tracked changes (redline) draft is available yet</p> <p>But redline draft must be made available before the November 14th special meeting to schedule a public hearing.</p> <p>The 2018.10.10 public meeting was labeled as a work session but does not meet the definition.</p> <p>The BoCC has instructed the Planning Department to draft the new SMP with the least restrictive criteria allowed by Ecology, but the current draft does not reflect this.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
953	10-Oct-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>People need to be able to construct a 500 square foot addition to the side of their existing home.</p> <p>Buffer setback needs to be modified. The current SMP has a 50 foot buffer. The draft has a 50 foot buffer plus a 15 foot setback. This needs to be changed to a total of 50 feet.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
954	10-Oct-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Legally constructed residences that are now in the buffer should be declared something more positive than "nonconforming".</p> <p>Mitigation credit should be given for prior improvements to shoreline ecological function.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
955	3-Aug-18	Ted Edenstrom	Email	AC_Definitions_150	730 Shorelines of the State	Change Requested	<p>Please specifically define shorelines "of the state".</p> <p>Thank you.</p>	Defined as 19.150.730. Further explanation/definition under consideration.	Pending / Item for Discussion
956	30-Jan-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	<p>Greetings Brad, thank you for a well run and productive meeting tonight.</p> <p>I would like to reiterate my request for the inclusion of an environmental representative on the Regulatory Group.</p> <p>Thank you,</p> <p>Phyllis Farrell,</p> <p>Chair, South Sound Sierra Club Group</p> <p>Sent from Outlook</p>	Staff responded and asked if commenter was requesting to participate as an environmental representative on the regulatory group.	Public Participation/Engagement

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
957	31-May-18	Phyllis Farrell	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Commenter expresses concern over the cancellation of the regulatory review group for SMP participation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/En gagement
958	16-Jan-19	Phyllis Farrell	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Commenter forwarded an e-mail sent to the department of ecology. Commenter expresses concern over aquaculture farming on Totten Inlet.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Commenter references "Toxic Pearl, Pacific Northwest Shellfish Companies' Addiction to Pesticides?" by M. Perle. Discusses use of pesticides and herbicides, and impact of that use on PNW aquatic biology.		
							Commenter cites unpublished Army Corps Draft Cumulative Impacts Analysis report.		
959	19-Jan-19	Tom Clingman	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	175 Shoreline Stabilization	Change Requested	Commenter urges carfeul review of industry practices to limit expansion and more rigorous environmental protections.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Brad - Request is that the SMP include simplified processes for repair of shoreline stabilization on closed basin lakes such as Lake St. Clair (LSC). Clearly, shoreline stabilization on rivers or saltwater can significantly impact downstream/down drift properties and habitat for salmon, forage fish and others. However, on a closed basin like Lake St. Clair there is no possibility of impact to vital SMP interests like salmon habit or watershed processes. Potential to impact adjoining properties is very low. The relatively low importance of closed basin lakes (LSC, Hewitt and Ward) is illustrated in how they are addressed in the County's SMP inventory. LSC is relatively large compared to Bald Hill Lake (10 SL miles and 21 miles watershed versus 1 SL mile and 794 acres watershed.) However, LSC is subsumed in the McAllister sub-basin, while Bald Hills is a discrete sub-basin.		
							The current SMP draft appears to require a Geotech Report and CUP or Admin CUP for all repair of shoreline stabilization, including on LSC. As you know, winter water levels have been extremely high on LSC for several years. When the water level finally goes down, a high percentage of property owners will need to repair bulkheads, floats, etc. Detailed geo-technical reports and extensive permit processing will be far more than is needed or useful on a closed basin lake. The definition of Normal Repair provides useful and important sideboards for this work. In a customized process for closed basin lakes, additional sideboards could be included if needed (ex. appropriate materials.) The shoreline repair that will eventually occur on LSC will be an opportunity to replace old creosote bulkheads and treated wood docks with better materials.		
960	19-Jan-19	Tom Clingman	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	175 Shoreline Stabilization	Change Requested	My request is that Thurston County craft simplified provisions for repair of shorelines on LSC and other closed basin lakes - provisions that match the much lower level of public policy concern about such work on a closed basin lake compared to saltwater or river shorelines. Please contact me by email or phone at 360 789 8875 to discuss. Thank you for considering this request.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
961	19-Jan-19	Tom Clingman	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	175 Shoreline Stabilization	Change Requested		Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
962	4-Sep-18	Phyllis Farrell	Email	AF_General_Reg ulations_400	120 Vegetation Conservation Buffers	Change Requested	I specifically request you consider and support the following: Buffers – Do not allow standard SMP buffer widths or setbacks to be modified or reduced; not for Shoreline Environmental Designations, vegetation conservation, or other areas. Mitigation – Encourage long-term net gains in both programmatic (planning-level decisions) and project (site-specific design detail) bases, particularly when conducting mitigation sequencing (avoiding, then minimizing, finally compensating for impacts). Require compensatory mitigation to occur in the same, or a related, habitat area for gain in the same ecological functions and ecosystem-wide processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
963	4-Sep-18	Phyllis Farrell	Email	AF_General_Reg ulations_400	120 Vegetation Conservation Buffers	Change Requested	I specifically request you consider and support the following: Aquaculture – Aquaculture’s use of shorelines must be consistent with the regulations of the Shoreline Management Act, the shoreline master program, and Best Available Science. A water-dependent use, aquaculture is polluting western coastlines, sounds, and estuaries with plastics. The use of plastic by the aquaculture industry is pervasive, and will increase with industry expansion. Geoduck aquaculture mitigation practices, when based on Best Available Science, are known to reduce risks to birds and other wildlife. Use mitigation practices to reduce these and other risks.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
964	17-Oct-18	Meredith Rafferty	Email	AE_General_Goa ls_and_Policies_ 300	100 Shorelines of Statewide Significance	Change Requested	Concern that SMP Draft includes more areas for "Shorelines of Statewide Significance" than as defined by the Department of Ecology. Ecology: [• Pacific Ocean coastline, from Cape Disappointment to Cape Flattery - including all the harbors, bays, estuaries, and inlets seaward from the ordinary high water mark and all associated shorelands. • Specific estuarine areas, including Birch Bay, Hood Canal, Nisqually River delta, Padilla Bay and Skagit Bay situated between the ordinary high water mark and the extreme low tide line and associated shorelands. • All other areas of Puget Sound, Strait of Juan de Fuca, and adjacent saltwater areas lying waterward of the extreme low tide, excluding adjacent tidelands and shorelands.]	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Commenter also provided handouts of same document to every member of the planning commission. Document includes excerpts from cited documents as well as transcript of commenters 3 minute spoken public comment, which was presented at the PC meeting.	Pending / Item for Discussion
965	17-Oct-18	Meredith Rafferty	Email	AE_General_Goa ls_and_Policies_ 300	100 Shorelines of Statewide Significance	Change Requested	Whereas SMP Draft (Defined in: 19.150.740, explained in 19.300.100): A. Nisqually Delta - from DeWolf Bight to Tatsolo Point, between the ordinary high water mark and the line of extreme low tide, together with shorelands associated therewith per RCW 90.58.030(2)(f)(vi). B. Puget Sound - seaward from the line of extreme low tide.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Commenter also provided handouts of same document to every member of the planning commission. Document includes excerpts from cited documents as well as transcript of commenters 3 minute spoken public comment, which was presented at the PC meeting.	Pending / Item for Discussion
966	17-Oct-18	Meredith Rafferty	Email	AE_General_Goa ls_and_Policies_ 300	100 Shorelines of Statewide Significance	Change Requested	Whereas SMP Draft (Defined in: 19.150.740, explained in 19.300.100): C. Lakes, whether natural or artificial, or a combination thereof, with a surface acreage of one thousand acres or more measured at the ordinary high water mark. D. Natural rivers or segments thereof downstream of a point where the mean annual flow is measured at one thousand cubic feet per second or more.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Commenter also provided handouts of same document to every member of the planning commission. Document includes excerpts from cited documents as well as transcript of commenters 3 minute spoken public comment, which was presented at the PC meeting.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
967	17-Oct-18	Meredith Rafferty	Email	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Change Requested	Whereas SMP Draft (Defined in: 19.150.740, explained in 19.300.100): E. Shorelands and wetlands associated with A through D above11] Commenter also spoke at the Planning Commission and provided a transcript of their 3 minute public comment. Main concerns: "dramatic change in oversight presented in this draft re: definition of statewide significance" "change would move consideration of what will be allowed on upland salt water properties from local to statewide priorities" "Neighboring counties and cities on the same Puget Sound have not made this change. "	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Commenter also provided handouts of same document to every member of the planning commission. Document includes excerpts from cited documents as well as transcript of commenters 3 minute spoken public comment, which was presented at the PC meeting.	Pending / Item for Discussion
968	3-Oct-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Thanks Brad, but I will be unable to attend due to a conflict with the regularly scheduled meeting of the South Sound Group Sierra Club. I have previously made public comments to the BOCC advocating for the inclusion of public comments in the draft plan and to extend the time period to allow for more public participation. Thanks Phyllis	Staff sent out updates on Planning Commission Cancellations and Rescheduling	Public Participation/Engagement
969	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Logistics	I have attached a letter and accompanying pictures for the SMP review. I hope these will be included in the public record. I plan on presenting this information at the Nov. 7th Planning Commission meeting. Will you be forwarding the attachments to the County Commissioners and Planning Commission members, or should I bring copies?	Staff sent out updates on Planning Commission information packets. Provided options for commenter to submit information to the PC.	Public Participation/Engagement
970	5-Nov-18	Phyllis Farrell	Email	AG_Permit_Provisions_Review_and_Enforcement_500	075 Permit Types Definitions	Change Requested	Aquaculture operations and permits need to comply with the Endangered Species Act, the Shoreline Management Act and both the State and National Environmental Policy Act restrictions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
971	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Limit industrial aquaculture expansion to protect forage fish habitat and salmon/Orca recovery.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
972	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Ban hydraulic harvesting practices or require an HPA permit	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
973	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Limit/phase out the use of marine plastics.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
974	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Climate Change: Sea level rise associated with climate change may result in efforts to increase armoring (shoreline modifications and development) which often negatively affects spawning sites of forage fish and shortens buffers. The Puget Sound Partnership has identified a goal to remove more shoreline armoring in Puget Sound than is constructed between 2011 and 2020. Limit armoring projects. On behalf of the South Sound Sierra Club Group, representing over 2400 members, I urge you to incorporate these recommendations when finalizing the Thurston County Shoreline Master Plan.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
975	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Limit armoring projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
976	5-Nov-18	Phyllis Farrell	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Collection of pictures depicting the impact of aquaculture on local environment.	Forwarded to Planning Commission.	No Action Required
977	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Maintain the Shoreline Residential Buffer at 50 ft: set the total buffer/setback at 50 ft. either 35 ft buffer and 15ft setback or a 50 ftt buffer with no setback.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
978	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.2 Mitigation Standards for Specific Development Activities	Change Requested	Update drawings in appendix B to more accurately reflect the requirements without asterisks that state ""building setbacks also apply". What does this mean?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
979	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Change Requested	Legally constructed residences that are now in the buffer should be declared "legally conforming" or "conforming" not "nonconforming"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
980	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	A.2 If a structure of more than 35 ft in height is proposed and no views or views of less than a substantial number of residences are unaffected will the permit be approved?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
981	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	C.3.b. This exemption needs to include "remodel" and "reconstruction" within the original footprint. What happens within the footprint of the home should be governed by the Building Code, not the SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
982	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	C.3.g This paragraphg contains the 35 ft height reference. See comment above for A.2	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
983	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	C.3.h.i: The \$10,000 fair market value needs to be modified. The permit cost for a normal 48 ft long pier/dock on a lake is \$10,000. Permits/fees need to be excluded from the \$10,000 limit.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
984	7-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	On the Draft Timeline to be presented to the planning commissioners tonight: Will Shoreline stakeholders be part of the "guest speakers" agenda on December 5th? Will shoreline stakeholders be part of the "small group" meetings scheduled for Dec. 12 and January 4th? Will the redline version delivered for the January 16th meeting be a complete document? All chapters and appendices?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
985	7-Nov-18	Townsend and Boston Harbor	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Change Requested	Re: Army Corps of Engineers 2017 Draft Cumulative Impact Analysis regarding adoption of NWP 48 permit for industrial shellfish aquaculture. Conclusion: Significant Cumulative Impacts. The Corp also noted that in their view: "... the proposed action is not consistent with either of these requirements [SMA no net loss of eel grass and Fed reqs to protect eelgrass under the ESA]". Corp also noted: "The proposed action [aquaculture] is isoncistent with state requirements under the SMA to protect forage fish spawning habitat." Recommendation: All of the premitting agencies should NOT continue to site these industrial scale operations where they can - and likely will - have significant unacceptable cumulative affects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
986	29-Oct-18	Protect Puget Sound, Laura Hendricks	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Disapproval of current aquaculture practices. Cites: Biological Assessment. Conclusion: Per the Assessment: "Determination that shellfish aquaculture: "may affect, likely to adversely affect." Important Study Findings: 1c. Even with mitigation, shellfish aquaculture still results in adverse impacts. 1d. Summary of Active and Fallow Shellfish Aquaculture Co-located with eelgrass and forage fish spawning Comment Cites 8 scientific studies/articles on harm of plastic aquaculture gear and toxic plastic pollution.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
987	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	SMP guidelines developed by the Dept of Ecology specifically identify aquaculture as a water-dependent, preffered shoreline use. Many other policies and laws support preservation and expansion of shellfish aquaculture	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
988	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Shellfish Aquaculture is highly regulated, and the County SMP should streamline permitting requirements.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
989	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Recent Washington Shorelines Hearings Board Decisions Confirm Shellfish Aquaculture is a preferred use with insignificant environmental impacts	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
990	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AC_Definitions_150	310 Eelgrass	Change Requested	Eelgrass: change definiton to include "native". Reasoning: both native and non-native species of eelgrass are in WA, and non-native is a noxious weed that should be controlled, not protected.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
991	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	600.115.A.3.a. Change Conditional Use Permit (CUP) requirements so that they are not required for existing aquaculture being converted to commercial geoduck aquaculture.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
992	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	600.115.B. Change requested: delete 115.B. (permit requirements)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
993	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	600.115.C.1.b. Reduce restrictions and expand actions allowed by substantial development or conditional use permits. (for aquaculture)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
994	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	600.115.C.1.c.n.vii Change "necessary to minimize aethetic and habitat impacts..." to "avoid significant aesthetic and habitat impacts..."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
995	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Included a scientific article: "Microplastics in the context of regulation of commercial shellfish aquaculture operations" Concludes that microplastics in the Salish Sea do not suggest significant release of microplastics from shellfish aquaculture operations.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
996	20-Nov-18	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	Included a memo with the District Engineer on Nationwide Permit Reissuance and e-mail correspondence suggesting that an incomplete US ARMY engineer report was leaked and that version was "non in its current version". Discussion on aquaculture cumulative effects. NEPA-level analysis.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
997	9-Nov-17	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Change Requested	General letter. Requests that the SMP is updated, it follows the science and law pertaining to shellfish aquaculture to foster aquaculture in Thurston County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
998	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	A.3.a. "rationale unclear why require CUP for existing aquaculture operation that wants to convert to growing geoduck" Suggestion: For existing aquaculture operation converting to geoduck, only require a CUP if the site involves direct impact to eelgrass / kelp beds	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
999	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	B.2. Suggestion: for "a baseline description of existing and seasonal conditions, including best available information"... ADD "using existing resources and databases where applicable."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1000	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	B.2.h. Suggestion: Change the guideline/protocols for eelgrass and macroalgae surveys from that of WDFW to the ACOE. This will help minimize duplicative efforts between federal and local application requirements. Clarify that if photos demonstrate a lack of aquatic vegetation, there should be no need for further surveying	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Need to develop a photo protocol?	Pending / Item for Discussion
1001	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	B.2.j. Suggestion: like ACOE, accept programmatic analyses referenced above as an applicant's proxy biological evaluation if the applicant's activities meet the following three conditions: 1. The proposed activities fall within the scope of activities described in the PBA 2. the applicant can and will meet the PBA's conservation measures, and 3. the proposed site occurs within the geographic area considered by the PBA. Require additional work only if the applicant's proposed activities or location differ substantially and substantively from those addressed in the above documents.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1002	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	B.4. Author finds the size of required studies to be daunting for small businesses. Q: If permit conditions are not determined until after review of the application (and in some cases, review by a hearing examiner), how doe sthe county know which of these reports and studies is needed to ensure compliance with permit conditions, and when in the process will the applicant be required to provide the studies/analyses? Suggestions: 1. B.4.b through B.4.d seem like permit requirements, not application requirements. Were these misplaced in this section? 2. Depending on what the county has in mind, requirements such as B.4.e through B.4.h may create too much cost uncertainty for a small business to handle. Consider an explicit policy statement encouraign use of existing information (versus original field work).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1003	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	C.1. General Standards: "Ecology recommends local governments address dormancy in order to avoid abandonment provisions from unintentionally applying to ongoing aquaculture operations." Author did not find where the issue was addressed. Suggestion: Add a general standard that addresses dormancy. Look to sample language from Mason County SMP (General aquaculture regulations)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1004	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	C.1.d. Suggestion: Reword. Change to: "Aquaculture shall not substantially interfere with navigation and other water-dependent uses, while also being protected against encroachment from incompatible, competing uses."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1005	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	C.1.l. Author believes we understand the intent of this standard. However a literal interpretation of "structure" might be troublesome. Suggestion: Revise the standard to make it clear that submerged equipment secured to the substrate is not included.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1006	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	C.2 Many of the additional standards for commercial geoduck aquaculture are appreciated and are equally applicable to all shellfish aquaculture Suggestion: Move, and reward as necessary, subsections C.2.b. through C.2.e. to General Standards so they apply to al shellfish aquaculture, not just geoduck	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1007	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	Critical Areas and Ecological Protection: Suggestion: "Protect and conserve shoreline natural resources, including protection of critical areas (Title 24 TCC), whole accomodating reasonable and appropriate uses, consistent with no net loss to shoreline ecological functions and processes."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1008	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	105 Critical Areas and Ecological Protection	Change Requested	105 G (Policy SH-13): Suggestion: Add the following: 5. In considering factors 1 through 4, special emphasis should be placed on impacts that fall outside the range of natural variation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1009	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	Water Quality and Quantity 115 A. (Policy SH-18): Suggestion: Change to "Shoreline use and development should minimize impacts that contaminate surface or ground water, cause adverse effects on shoreline ecological functions, or impact water-dependent opportunities, including healthy shellfish harvest."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1010	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 F. (Policy SH-31): Suggestion: Change to "Potential locations for aquaculture activities are relatively restricted by water quality, temperature, dissolved oxygen content, currents, adjacent land use, wind protection, commercial navigation, and salinity. Therefore, priority should be given to aquaculture uses in areas having high potential for such uses. In addition, shoreline and upland development in productive aquaculture areas and areas with a high potential for aquaculture should be reviewed for detrimental impacts on aquaculture, and aquaculture operations should be protected against encroachment from incompatible, competing uses.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1011	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 F. (Policy SH-31): Suggestion:Change technology-experimental policy. Want to see a distinct separate policy, starting with the language "The technology associated with some forms of aquaculture..."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1012	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 H. (Policy SH-33): Suggestion: Replace "significant conflict" with "substantially interfere"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1013	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 J. (Policy SH-35): Suggestion: Change language to... "Upland uses and modifications should be properly managed to improve, where needed, and avoid degradation of water quality of existing shellfish areas and those areas with a high potential for aquaculture uses."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1014	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 K. (Policy SH-36): Suggestion: Delete this entire policy.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1015	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 L. (Policy SH-37): Suggestion: It would be helpful for applicants to have some clarity as to when a project is no longer considered "small scale".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1016	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 (Policy Statement Additions): Suggested Policy Addition 1: Minimize redundancy of permit application requirements and permit standards/conditions between this Program and those of other County, State and Federal permit processes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1017	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 (Policy Statement Additions): Suggested Policy Addition 2: Encourage and support use of existing public/private sources of information when responding to permit application requirements unless there is a compelling and substantive reason to believe that only original site analysis can address an issue.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1018	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AE_General_Goals_and_Policies_300	130 Shoreline Use and Site Planning	Change Requested	Shoreline Use and Site Planning 130 (Policy Statement Additions): Suggested Policy Addition 3: Where there is an irreconcilable conflict between water-dependent shorelines uses or physical public access and maintenance of views from adjacent properties, the water-dependent uses and physical public access shall have priority, unless there is a compelling reason to the contrary.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1019	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AI_Special_Reports_700	100 Special Reports-General	Change Requested	Special Reports - General: Suggestions: 1. Add: "A special report will be required only when a compelling reason, consistent with SMA intent, is demonstrated by the County." 2. Add: "In preparing a special report, use of existing documents, analyses, and data sources is encouraged; original data collection and analyses are required only if existing sources are demonstrated to be inadequate to addressing an issue.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1020	26-Nov-18	Arcadia Point Seafood, Steve & Vicki Wilson	Email	AI_Special_Reports_700	115 Habitat Management Plan	Other	The following comment applies to these three sections as they relate to aquaculture. 700.115 Habitat Management Plan 700.130 Cumulative Impacts Report 700.145 Biological and Habitat Surveys Comment: "We believe that the suggested additions to Special Reports - Genera provided above, along with prior suggestions... will help reduce cost uncertainty, minimize redundancy, and provide additional guidance to applicants and reviewers, without limiting the County's ability to have a robust review process."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required
1021	27-Nov-18	James B. Coffee	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Comment: I hope the approach of the Planing Commission will be to shore up any short comings in current laws and practices while encouraging development of aquaculture and easing the permitting process. Please don't allow this process to add administration burdens unless specific problems which are not already being adequately addressed are to be solved.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	No Action Required

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1022	28-Nov-18	Jim Gibbons, Seattle Shellfish	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	General Feedback / No Specific Section	Change Requested	Trim the cumbersome aquaculture permitting to be more like Mason County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1023	28-Nov-18	Daniel Barth, Patriot Shellfish Farms	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	General Feedback / No Specific Section	Change Requested	Streamline permitting and reduce restrictions and requirements.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1024	28-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Other	Suggest the planning department that they develop a pamphlet, regulation or policy booklet that would describe those things you can do in the buffer, on the shoreline or on Piers, floats or wharfs without a permit.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1025	28-Nov-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	General Feedback / No Specific Section	Change Requested	Concerns that CPED is only presenting pieces of the chapters at PC meetings, would like to see every component of every chapter presented at PC meetings.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1026	29-Nov-18	Jeffrey Fisher, Steamboat Island Shellfish	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	110 Agriculture	Change Requested	B.2. Clarify components necessary for environmental review. Requirements are put forward that lack clarification on methodology, consideration of project scale, or recognition of what is already required in the permitting landscape.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1027	29-Nov-18	Jeffrey Fisher, Steamboat Island Shellfish	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	110 Agriculture	Change Requested	B.3.a. Remove Conditional Use Permit requirement for geoducks In 3a., geoduck farming, regardless of land zoning (i.e., natural, rural, etc.), is to be considered for authorization only with a 'condition use' as proposed, this would imply that geoduck farming is a non-conforming activity for the waters of the county. As geoduck farming is simply the aquaculture of a native clam species, and aquaculture is recognized elsewhere in the SMP language as a preferred use, then it simply does not stand to reason that geoduck farming should be singled out as requiring a conditional use permit in contrast to all other forms of shellfish aquaculture and other water dependent use permits.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1028	29-Nov-18	Harry Branch	Email	AA_General_Fee dback	General Feedback / No Specific Section	Change Requested	Commenter DISAGREES with the following claims: 1. Geoduck aquaculture doesn't damage eelgrass. 2. We know that geoducks don't eat forage fish larvae because we don't find them in the gut of geoducks. 3. Geoducks are filter feeders and they clean the water.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1029	4-Dec-18	Margaret A. Pilaro Executive Director, PCSGA	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	As currently written, Section 19.600.115 of the Draft SMP is inconsistent with the State Shoreline Management Act which encourages the use of the state's shorelines for aquaculture as a preferred water dependent use. The intent of this section is also inconsistent with the Washington State Shellfish Initiative, originally enacted by Governor Gregoire and reaffirmed by Governor Inslee, with the goal to promote this preferred use of statewide interest. PCSGA respectfully requests changes be made to the proposed language to include recognition of the following: 1. Aquaculture is a preferred, water dependent use in the Shoreline management Act.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1030	4-Dec-18	Margaret A. Pilaro Executive Director, PCSGA	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	As currently written, Section 19.600.115 of the Draft SMP is inconsistent with the State Shoreline Management Act which encourages the use of the state's shorelines for aquaculture as a preferred water dependent use. The intent of this section is also inconsistent with the Washington State Shellfish Initiative, originally enacted by Governor Gregoire and reaffirmed by Governor Inslee, with the goal to promote this preferred use of statewide interest. PCSGA respectfully requests changes be made to the proposed language to include recognition of the following: 2. Shellfish farming has been an important industry in Thurston County for over 100 years and shellfish farms have and continue to provide the community with both family-wage jobs and high quality, sustainably produced local food to members of the community.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1031	4-Dec-18	Margaret A. Pilaro Executive Director, PCSGA	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	As currently written, Section 19.600.115 of the Draft SMP is inconsistent with the State Shoreline Management Act which encourages the use of the state's shorelines for aquaculture as a preferred water dependent use. The intent of this section is also inconsistent with the Washington State Shellfish Initiative, originally enacted by Governor Gregoire and reaffirmed by Governor Inslee, with the goal to promote this preferred use of statewide interest. PCSGA respectfully requests changes be made to the proposed language to include recognition of the following: 3. Shellfish farmers have a long history of environmental stewardship. They depend on clean water and healthy ecosystems for our shellfish to thrive.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1032	4-Dec-18	Margaret A. Pilaro Executive Director, PCSGA	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	As currently written, Section 19.600.115 of the Draft SMP is inconsistent with the State Shoreline Management Act which encourages the use of the state's shorelines for aquaculture as a preferred water dependent use. The intent of this section is also inconsistent with the Washington State Shellfish Initiative, originally enacted by Governor Gregoire and reaffirmed by Governor Inslee, with the goal to promote this preferred use of statewide interest. PCSGA respectfully requests changes be made to the proposed language to include recognition of the following: 4. Changes to the application requirements in Section 19.600.115 that make it possible for all shellfish growers- new and established, small and large - to apply for and maintain shellfish farms in Thurston County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1033	4-Dec-18	Margaret A. Pilaro Executive Director, PCSGA	Email	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	As currently written, Section 19.600.115 of the Draft SMP is inconsistent with the State Shoreline Management Act which encourages the use of the state’s shorelines for aquaculture as a preferred water dependent use. The intent of this section is also inconsistent with the Washington State Shellfish Initiative, originally enacted by Governor Gregoire and reaffirmed by Governor Inslee, with the goal to promote this preferred use of statewide interest. PCSGA respectfully requests changes be made to the proposed language to include recognition of the following: 5. Changes to the policy and regulations of Section 19.600.115 that are consistent with the Washington Shellfish Initiative’s goal of improving permitting processes to maintain and increase sustainable aquaculture. The SMP should also acknowledge, and be consistent with, the rigorous permitting processes that shellfish farmers must complete including Tribal, Federal, and State requirements.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1034	3-Dec-18	Madeline Bishop	Email	AG_Permit_Provi sions_Review_an d_Enforcement_ 500	General Feedback / No Specific Section	Change Requested	Please do not remove current rules for geoduck aquaculture. The recent claims by the Shellfish Industry are not true. This is true: There has been no eelgrass study in a large tract of land. There is a correlation between expansion of geoduck aquaculture and the decline of other species. The impact of disruptions from geoduck aquaculture have not been adequately assessed. Please use caution in making changes that could further destroy our environment.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1035	3-Dec-18	Joe Scharf	Email	AA_General_Fee dback	General Feedback / No Specific Section	Support	All in all, I think it is counterproductive to regulate shellfish farming in Thurston County to the point it is being suggested, which would make it nearly impossible to get a new permit. If there is any provable deleterious effect which shellfish farming has had, I have never been presented with the data. I am aware that some of the arguments are from the aesthetic perspective, and in my opinion that is what all the arguments boil down to, although opponents to shellfish farming won’t admit it. Some of my neighbors are very angry about shellfish farming and will actually walk onto my property to verbally abuse the workers. Their arguments have been “the boat is ugly” or “I don’t like the tubes.” There is no scientific or economic reasons (of which I am aware) that suggest shellfish farming is harmful in any way. I would put myself firmly in the “shellfish farming is beneficial” camp, and urge you to not make shellfish farming difficult to the point of being impossible. Thurston County gains many benefits from it, not the least of which is a much cleaner Puget Sound, tax dollars, and employed citizens.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1036	5-Dec-18	Townsend	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Other	Commenter provided a list of academic and professional articles in support of the argument that PVC and HDPE aquaculture gear are toxic and create microplastics that are known to harm marine life. Kazmiruk et al, 2018 "Abundance and dsitribution of microplastics within surface sediments of a key shellfish growing region of Canada" Munier and Bendell, 2018 "Macro and micro plastics sorb and desorb metals and act as a point source of trace metals to coastal ecosystems." Article about the above study, conducted with Bendell, 2018. Bendell and Wan, 2010 "Application of aerial photography in combination with GIS for coastal management at small spatial scales: a case study of shellfish aquaculture" Bendell, 2015 "Favored use of anti-predator netting (APN) applied for the farming of clams leads to little benefits to industry while increasing nearshore impacts and plastic pollution"	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1037	5-Dec-18	Townsend	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Other	Questions for Planning Staff to provide answers at citizen stakeholder meetings: +Thurston County has already allowed most of the County's bays and coves to be converted to industrial aquaculture. How is Thurston County planning to meet the goal of preserving forage fish, eelgrass and salmon habitat? +What program does the County and State have for surveying herring, spawning beds, native eelgrass, burrowing shrimp and salmon smolts? +How does the County or WDFW actually "manage estuarine ecology"? We have never been aware of any "management" of the three geoduck operations we can see on Dana Passage. The County doesn’t have a record of these operations. +Why are the state and count y so determined to turn the tidelands of Puget Sound over to an industry in which the main player, Taylor Shellfish, has only 60 permanent and 20 seasonable employees? +How can our state and county governmental entities contie to support putting seven miles of PVC and/or HDPE plastics in an acre of tideland, creating a monoculture, while at the same time claiming that they want to save the salmon and the orcas?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1038	5-Dec-18	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Logistics: Wants the redline draft done 2 weeks earlier than the current schedule, and wants the open house moved back a week comapred to the current schedule.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Public Participation/Engagement
1039	10-Dec-18	Robert Jensen	Email	AA_General_Fee dback	General Feedback / No Specific Section	Change Requested	Concerns over toxic blue-green algae blooms due to proliferation of septic systems on the lakes. Development standards should include regular testing and pumping of septic tanks.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1040	11-Dec-18	Paula Lowe	Email	AA_General_Fee dback	General Feedback / No Specific Section	Logistics	Commenter: I see a list of concerns by Thurston County Residential Shoreline Stakeholder Coalition and I heartily agree with their recommended changes. Overall, I have been extremely disappointed with this SMP process: How it was publicized (and not publicized), how it has been handled (poorly), how many of us feel unheard and pushed aside, and more. I would like to see the SMP finalized soon — taking in all of the comments from the above-mentioned coalition and others. Regarding publicity, very few people read The Olympian anymore — it’s mostly for an older demographic. A younger demographic may read the online version. I suggest direct mail and emails to contact people who are interested in this process. You have a huge list from the meetings.	Forwarded to Planning Commission.	No Action Required
1041	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Reg ulations_400	120 Vegetation Conservation Buffers	Policy Question	What is meant by “or less”? How much less? Comment is in response to shoreline buffers “new buffers are now 200 feet or less”	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1042	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Support	No, please retain buffers as in previous plans. Buffers protect habitat and mitigate against sea level rise.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1043	19-Dec-18	SMP Open House Public Comment	Open House	AB_Introduction_100	General Feedback / No Specific Section	Policy Question	What do insurance companies require? More or less than County?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1044	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	100 Existing Development	Support	Rebuilding after fire or disaster for proposed SMP is great. Families would be devastated under old SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1045	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Other	No Plan is good without anticipating sea level rise	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1046	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	105 Proposed Development	Change Requested	We feel that carports should be included in storage structures. They are a pass-through design that has less impact than a storage shed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1047	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	100 Existing Development	Support	Yes, rebuilding after fire, remodel	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1048	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Protect nearshore marine environments, maintain/increase buffer	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1049	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	A change is requiring “prior written approval” of “all development”. No, burdensome, what value, have other building permits to control, new requirements on bulkheads, docks to control.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1050	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Need bigger buffer, due to sea level rise	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1051	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Wide, wide buffers. Helps stop downstream flooding	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1052	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Keep 250 foot buffers, stop erosion, better marine wildlife fish & birds marine mammals	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1053	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	General Feedback / No Specific Section	Change Requested	Need more environmental / Sea level rise emphasis, look at ecosystem function first. This goes backwards. Need to discourage shoreline building.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1054	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	100 Existing Development	Support	“Complex process” is good. Discourage shoreline building. Makes no sense to allow rebuild if “natural disaster” is flooding. Climate is changing and we need to restore shoreline.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1055	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	No to all this expansion without permits, keep the buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1056	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	100 Existing Development	Support	We like that our home can be rebuilt with its existing footprint in the event of major damage.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1057	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Protect marine nearshore environment for salmon/orca recovery. Maintain / increase buffers.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1058	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Why is the limit only 500 feet? Is there a legal reason for this or just general practice?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1059	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	100 Existing Development	Policy Question	Do these provisions apply to seawalls?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1060	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Can you include rapidly eroding cliffs in buffer zone? Will there be more such cliff with sea level rise? Could plan at least be revised say every 10 years.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1061	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Less buffer, not more!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1062	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	More buffer, not less! Both marine and freshwater. Current buffers don't do the job.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1063	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Maintain the current buffers!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1064	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Why reduce buffers?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1065	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Can you include rapidly eroding cliffs in buffer zone? Will there be more such cliff with sea level rise? Could plan at least be revised say every 10 years.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1066	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Let homeowners do daily maintenance of buffers without “written permission” at permit office.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1067	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Policy Question	Does 1993 forest plan & supporting documents address buffer for fish & aquatic insects?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1068	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Support	Yes! Buffers protect habitat, aid with pollution removal, streambank stability. Keep them!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1069	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Any chance buffer can be increased for new construction? (fresh water)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1070	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	110 Mitigation	Policy Question	Will the new SMP promote more preservation of native vegetation? Will it promote removal of more sea walls?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1071	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	110 Mitigation	Change Requested	Give homeowners “credit” for doing voluntary mitigation, before major project requiring mitigation.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1072	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	110 Mitigation	Support	Yes, to bulkhead removal. Need natural shoreline to restore Puget sound marine function. Also best adaptation to sea level rise.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1073	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	110 Mitigation	Support	Keep going on “in lieu of fee”.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1074	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	110 Mitigation	Support	Yes to restoring natural habitat, support rain gardens and removing bulkheads.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1075	19-Dec-18	SMP Open House Public Comment	Open House	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Support	Mitigation Requirements are a great idea.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1076	19-Dec-18	SMP Open House Public Comment	Open House	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Support	Sounds reasonable to me.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1077	19-Dec-18	SMP Open House Public Comment	Open House	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Other	Reles (?) shoreline planting plan for P.O.’s (?)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1078	19-Dec-18	SMP Open House Public Comment	Open House	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	List of native vegetation to replace with.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1079	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	IV. Maps	Policy Question	Aquaculture over tidelands? Why is it not different by designation? Has an aquaculture permit ever been turned down, and why?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1080	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	IV. Maps	Support	Yes, keep mining out of shoreline areas.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1081	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	General Feedback / No Specific Section	Other	I own tidelands but others can do whatever they want.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1082	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	IV. Maps	Support	Yes to maintaining ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1083	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	IV. Maps	Change Requested	Object to aquatic designation being defined as “resource” area of that means wholesale permission to turn tidelands to industrial farming. This is contradictory to “protecting” and “restoring” the tideland areas and is in fact diminishing the aquatic processes to species, it is basically “blacktopping” the tidelands.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1084	19-Dec-18	SMP Open House Public Comment	Open House	AG_Permit_Provisions_Review_and_Enforcement_500	105 Procedure	Change Requested	Add step 5: determine an end date for your project, so that the “buffer” etc. matches where shoreline will be.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1085	19-Dec-18	SMP Open House Public Comment	Open House	AG_Permit_Provisions_Review_and_Enforcement_500	075 Permit Types Definitions	Other	See if Washington Department of Fish and Wildlife or Department of Ecology has list of shoreline restoration priorities in the county. I’ll bet they do!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1086	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	II. Shoreline Environmental Designations	Change Requested	Add a designation: areas that should be restored to restore overall ecosystem function or account for sea level rise.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1087	19-Dec-18	SMP Open House Public Comment	Open House	AG_Permit_Provisions_Review_and_Enforcement_500	075 Permit Types Definitions	Policy Question	Can county specify that no non-native (to Washington) species are allowed to be cultured?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1088	19-Dec-18	SMP Open House Public Comment	Open House	AG_Permit_Provisions_Review_and_Enforcement_500	075 Permit Types Definitions	Policy Question	Does “shoreline” include eroding cliffs outside the “shoreline”? If not, may not provide needed protection.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1089	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	General Feedback / No Specific Section	Change Requested	Need a mitigation table or an in-lieu mitigation table	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1090	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	General Feedback / No Specific Section	Other	Public Access points – ecology survey	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1091	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	General Feedback / No Specific Section	Other	Language of marine vs freshwater development (i.e. pier vs dock)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1092	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Other	High water line is changing and the new plan should recognize this	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1093	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Other	"I agree" (in reference to comment #870: High water line is changing and the new plan should recognize this)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1094	19-Dec-18	Townsend and Boston Harbor	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Other	As currently written, the draft SMP would implement a new system of shoreline permits to cover all actions a home owner might take anywhere within 200 feet of the highwater mark. Activities large or small would require either a Substantial Development Permit or a new, "written approval" available from the County's permit office (pages 62 and 65 of the draft SMP). The wording covers "all development" which by definition in the SMP covers any activity and is alarmingly broad.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1095	19-Dec-18	Townsend and Boston Harbor	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	General Feedback / No Specific Section	Other	We also note that other building and site regulations, in addition to the shoreline regulations, will continue to apply. These buildings regulations already provide comprehensive oversight and raise a question of why additional scrutiny is required with a "written approval".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1096	19-Dec-18	Townsend and Boston Harbor	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	Thousands of homes are in the SMP's jurisdiction at the County's many rivers, lakes, streams, wetlands and areas of salt water. We question the logistics and the effectiveness of such scrutiny of each and every one of them. What is it that home owners are doing so wrong?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1097	19-Dec-18	Townsend and Boston Harbor	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	We ask that this broad and cumbersome control system be rethought along these lines: 1. Acknowledge the controls already in place with building and shareline permits. Acknowledge the new dock and bulkhead regulations of the state that will be added for further control.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1098	19-Dec-18	Townsend and Boston Harbor	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	We ask that this broad and cumbersome control system be rethought along these lines: 2. Support home owners in being proactive every day within this framework of controls. -Step up the outreach with a message of what's possible to do today with everyday maintenance and repair. -Don't add more permits and permissions. Drop the proposed "written approval" process. - Specifically encourage plantings along shorelines. Actively connect home owners with resources. Do not require permits and permissions. Provide "credit" toward future mitigation for large projects under permits. Put real life into the wording of the voluntary private restoration discussed in Appendix C, page C-13.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1099	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Logistics	Discusses inability to review the whole SMP in a few hours, requests the SMP to be available online.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1100	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Other	What stands out so far is: 1. No provision is made for sea level rise 2. I could not find reference to steep slopes; I am concerned that sea level rise with de-stablize more cliffs. 3. There does not seem to be an incentive to remove sea-walls, especially if piers are not involved. 4. Much info has been gathered in recent years about fish spawning in the upper intertidal. I wonder if such data could affect protection of commonly-used spawning grounds for role sole, sand lance, and surf smelt.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1101	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Other	What stands out so far is: 5. Maybe the SMP should address critical areas as defined in the WA GMA + SMA. What buffers are appropriate for such areas? 6. Aquaculture can be benign or dangerous. Can County prohibit non-northwest species from cultivation or introduction? 7. Does WA WDNR, WDFW, or WDOE have list of shoreline restoration potential sites in the County? You ought to coordinate. 8. You ought to justify existing vs proposed buffers. You should also zero in on the most critical areas while allowing reasonable development and replacement where you foresee less harm.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1102	19-Dec-18	SMP Open House Public Comment	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Initial Thoughts: (A)(3)(b) - strike - this is a routine federally-permitted activity (B)(2)(b) - strike - economic expense and interagency overlap (B)(2)(i) - strike - fish surveys difficult and expensive (B)(2)(j) - strike - impossible to quantify to legal standard of three degrees CWA	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1103	19-Dec-18	SMP Open House Public Comment	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Initial Thoughts: (C)(1)(a) - strike "when consistent... environment" (C)(1)(c) - strike - vague, does not meet 3 degrees CW standard / enforcement (C)(1)(h) - does not match non-conforming structures - original compliance? (D)(2)(a) - algae cleaning required routinely. Clarify. (D)(2)(b) - thanks! (D)(2)(c) - reference @ (A)(3)(b).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1104	19-Dec-18	SMP Open House Public Comment	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Other	A system for rebuilding that allows an "exemption" for doing the right thing rather than conforming to the SMP which could be the wrong thing or doesn't improve net eco function, ie rebuild but move the house back 20 feet - but you are still in the buffer and therefore lose your exemption.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1105	19-Dec-18	SMP Open House Public Comment	Open House	AJ_Appendix_A_Shoreline_Environment_Designations_Map	IV. Maps	Policy Question	1. Marine, lakes, & rivers have different needs and environmental systems. They should have different requirements for docks & bulkheads. 2. Why is most of Thurston County Classified as a 100 year flood plain? Much of it isn't.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1106	19-Dec-18	SMP Open House Public Comment	Open House	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Policy Question	For the existing "non-conforming" structures, ie Boathouse, dock, seawall and stairway, what are the rules for "normal repair or maintenance" ? i.e. one board on dock breaks vs "major" repair (no increase on current footprint)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1107	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Policy Question	1. Needs to be a mitigation table that gives options other than taking recreational area away from the beach front and our children/grandchildren. 2. Explanation of what self liquidating mitigation would look like. 3. Water quality is a concern when leaves, needles and other organic matter gets in a lake.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1108	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	I live on Lake Lawrence and am not in favor of increasing the buffer from 100 feet to 150 feet.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1109	19-Dec-18	SMP Open House Public Comment	Open House	AA_General_Feedback	General Feedback / No Specific Section	Policy Question	How is the SMP addressing climate change? What provision in the proposed buffer reductions will protect nearshore environments (critical habitat) and residents?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1110	19-Dec-18	SMP Open House Public Comment	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Aquaculture operations/permits should not allow alteration of shellfish beds with the use of heavy equipment, raking of sanddollars / starfish etc, use of "predator" nets, use of pesticides, use of hydraulic hoses during harvesting, and use of plastics.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							2017 army corps of engineers report concluded industrial aquaculture posed significant risks to the marine ecosystem. Although this report was not released due to apparent lobbying pressure from the industry, the studies and scientific results are documented and true! Thurston County should assume leadership in protecting Salmon Habitat (and Orca recovery) by limiting aquaculture expansion, phasing out use of marine plastics and monitor operations to assure "no net loss" of ecological function.		
1111	19-Dec-18	SMP Open House Public Comment	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Over Water structures - discourage them - emphasize restoration where possible (e.g., be very stringent about rebuilding docks)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							Maps - update every 5 years or so for shoreline, at least where there is demonstrable rate of change.		
							Aquaculture policy sh-23 - delete it or change from "minimize adverse impacts" to "no adverse impacts/effects" Policy sh-30 - scratch "preferred use". Restorative / ecosystem function is of state interest, not proven that aquaculture is best use for this even in terms of economic development.		
1112	19-Dec-18	SMP Open House Public Comment	Open House	AH_Shoreline_Use_and_Modification_Development_Standards_600	175 Shoreline Stabilization	Change Requested	Repair - if due to flooding or other potential climate causes, should trigger a permit review on that basis. Goal should be to discourage building in inappropriate areas based on current knowledge. Lawns - should be a buffer designed for landscaping freshwater shoreline. Otherwise we will see algae blooms for longer periods and every year (warmer summers)	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1113	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	1. Regulations should be tightened 2. Sea Level Rise and Climate Change should be built in (like the California coastal commission recommendations to municipalities) 3. Ecosystem function should be prized. Variances should be overseen by some kind of public review committee (like Oly's design review board).	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1114	19-Dec-18	SMP Open House Public Comment	Open House	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Policy Question	No net loss requirement: must account for sea level rise. Must be a plan to update shoreline map to reflect climate change - not just sea level rise but also impact of storms, etc.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1115	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Other	People new to the area, like us, have paid an exhorbitant amount of money to purchase a lot on a lake.... Since then there have been nothing but negative setbacks.... Now, on one of the charts it appears that an additional 50 feet might be added to the existing set back which brings up the question of why the heck we ever bought property in Thurston County.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1116	19-Dec-18	SMP Open House Public Comment	Open House	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	I disagree with increasing the setback on the lake because that is why we bought the property, to see the lake. I disagree with making us do delineation on Lake Lawrence. Noone else has had to do this. Now we are blocked to building by \$5,000 we have to pay. In 2018 a house was built and they did NOT have to do this.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1117	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Policy Question	How are mitigation areas tracked through time? I.e., how would the county know that a particular area is a mitigation site that should be retained or replaced if someone wants to have another future impact in the buffer?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1118	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.E. A bit confusing to read about a 1:1 ratio and then see table A below. Maybe add "...within this SMP or..."	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1119	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.E. WDFW recommends additional habitat value be required to account for temporal delays as appropriate. Temporal delays typically occur when mitigation occurs after the impact rather than prior to or simultaneously; or mitigation requires a long time to reach replacement value (e.g., the time it takes for vegetation to reach a fuctional level of maturity).	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1120	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.H. If limited functional vegetation already exists, there may be some value in enhancing with additional plantings. However that sort of activity should be valued differently than planting an area with no functional vegetation at all. In sites with an intact, fully functional buffer, an alternative mitigation or location should be employed.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1121	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.2 Mitigation Standards for Specific Development Activities	Policy Question	B.2.B. Are the conservation easements to be recorded, or the fact that a mitigation area exists and should be retained?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1122	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.3 New and Replacement Shoreline Armoring or Barrier Structures (in order of preference)	Change Requested	B.3.B I am glad to see soft shore techniques in this list. Would be great to see it encouraged for any length of replacement. Also, it should be required for new armoring wherever feasible. (I'm guessing that is already covered elsewhere?) Maybe make that item B. I.e., proponent would need to show why it would not work and hard armoring is necessary.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1123	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.4 New and Replacement Overwater Structures (in order of preference)	Policy Question	B.4.C Does this apply to all waterbodies, marine only, or some combination? WDFW does not require grating on overwater structures in lakes with no anadromous fish.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1124	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.4 New and Replacement Overwater Structures (in order of preference)	Change Requested	B.4.D Maybe switch D and E	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1125	1-Feb-19	WDFW	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.4 New and Replacement Overwater Structures (in order of preference)	Change Requested	B.4.F FYI, this is always included in HPA permits. If debris is part of a structure being replaced, it does not count as mitigation. If it is not related to the structure, then it counts as part of the mitigation for construction impacts. Removing something larger than random bits of debris, like a derelict boat, I would count toward more than just construction impacts.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1126	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	The county MUST condition with, or otherwise add, cumulative impact assessments to SDPpermitted projects. As stated in the Ecology SMP Handbook, the Shorelines Hearings Board has stated in several appeals decisions that a local government should have considered addressing cumulative impacts for an SDP.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1127	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Policy Question	How will the County include policies and regulations that ensure cumulative impacts from all development, including Water-dependent activities, will address the burden of those impacts and achieve no net loss of shoreline ecological functions and processes?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1128	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Bulkheads - The county needs a program, similar to the septic loan program for private property owners, for removing unwanted or unnecessary armoring structures. The cumulative effects of bulkheads are known to result in major impact to marine nearshore, riverine, and lake habitats (WAC 173-26-231(3)(iii)).	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1129	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Mining- Keep 1000 foot buffers. Identify upland gravel sources before deciding to site project operations in or near streams. Use larger rivers and streams before smaller; Prohibit, then severely restrict, gravel bar skimming or scalping. Address cumulative impacts of gravel extractions to fish migrating upriver to spawn through Federal (and NOAA), State, and county permitting processes.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1130	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Policy Question	How do you plan to fund compensatory mitigation plans long-term? A county-designated development area will expect vegetation to be significantly reduced and/or buffers worn down (functions reduced) over time. These plans must include a long-term funding source to ensure their benefits will be realized.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1131	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Restoration and Mitigation - We suggest Parcel Advance Mitigation, a type of mitigation system that involves restoration before development. Restoration must include monitoring and demonstrate benefits to environmental functions (a tiered approach, starting with groundwater recharge and discharge), during the 5 years prior to development.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1132	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	Monitoring and Restoration - Please heed the county’s statement that current local funding does not provide for effective regulatory on-site monitoring. Provide ways of funding on-site Monitoring, so restoration projects are not limited financially. The system does not allow for enough time for monitoring to be meaningful. It also does not provide for an effective program structure for restoration. As a result, restoration projects are limited in their timelines and scope (goals, deliverables, tasks)).	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1133	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Policy Question	Thurston county’s CIA (7-30-18) reads the SMA states, development impacts will not diminish the shoreline resources and values as they currently exist, and the Shoreline Restoration Plan can bring environment conditions to an “improved” level. Who are these groups, and how will they be managed to carry out restoration?.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1134	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	A.2. “Application of the mitigation sequence shall achieve no net loss of ecological functions for each new development. and shall not result in required m Mitigation. in excess of that which is necessary is not a requirement.” There is no reason to penalize additional mitigation, should a developer create it.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1135	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	A.2. Shoreline modifications, such as filling, dredging, or flood-control must not result, individually or cumulatively, in a net loss of ecological functions. Dredging, Clearing, or grading should not alter or otherwise affect marine habitat, change benthic habitat structure, beach community, or associated ecological functions. Preparing a site should not cause a “Net-Loss” of shoreline functions. Once mitigation sequencing is applied to a site, clearing and grading should not create a net loss of site functions and values.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1136	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Policy Question	B.1.A. Critical Areas Q-Will the county include land necessary for critical area buffers in the SMP? Critical Area buffers are addressed in WAC 173-26-201 (2)(c)(i)(D), which states: “Master programs shall contain requirements for buffer zones around wetlands;” and in WAC 173-26- 201 (2)(c)(iii)(D), for critical saltwater habitats, which requires “Establishing adequate buffer zones around these areas to separate incompatible uses from the habitat areas.” In the SMP update, the County is required to provide for management of Critical Areas (WAC 173- 25-221(2)), using scientific and technical information as described in WAC 173-26- 201(2)(a).	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1137	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Policy Question	B.1.A. Critical Areas Q-How can you reduce buffers and then increase a buffer by adding it around the house? A rain garden won’t help - the house will flood in a major flood event. The best way to protect ecological functions - AND houses - is through an unreduced expanded buffer. A buffer width reduction should be proposed through submittal of a habitat assessment study or report. Environmental baseline surveys should be used to determine where buffer width reductions will occur. Will the county require baseline surveys? Baseline surveys help explain whether development or industries would cause cumulative impacts on a shoreline’s ecological functions. These surveys are essential to determine necessary mitigation measures. Survey results make regulations easier to administer and clearer to interested parties. For example, survey information can assist when cross-referencing between aquaculture ‘Use’ provisions and general regulations.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1138	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.A. Critical Areas The county must give critical saltwater and freshwater habitats, including natural shellfish beds, consideration and protection from development, especially dredging. These aquatic habitats are vegetated and un-vegetated marine habitats, including mudflats, sandy beaches, forage fish spawning beaches, intertidal areas, oyster/barnacle beds, estuaries, and pocket estuaries. The county must protect these very important areas, as well as vegetated areas.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1139	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Change Requested	Buffers Residential: The BoCC must reconsider its reduction of a residential buffer from 85 feet (in 2017 draft SMP) to 50 feet (July 2018 draft SMP). Reduced buffers make the 50 foot buffer ineffective. BAS does not suggest buffer reductions. APA suggests large buffers in this time of climate change and sea level rise. Do it now, while there is still time, while you still have the chance. If buffers are reduced AND permitting allows intrusion into buffers, with increased development in the next 20-30 years, the ecological functions of these buffers could be badly damaged. The amount of mitigation, impacts analyses, and monitoring to achieve no net loss, WILL increase. Avoid these extra costs with large protective buffers and sensible variance requirements.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1140	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Change Requested	Buffers Natural: Natural Marine SEDs have considerably lessened in number and are smaller in size than in the past. Increase the Natural buffer width back to the 2017 draft of 250 feet to protect eelgrass and forage fish from aquaculture’s significant adverse effects, and remaining ecological functions, within and supporting adjacent SEDs. Keep Marine buffers at 250 feet. Provide exemptions or alternatives for public access in State parks. Land trust natural areas warrant a 1000’ separation distance as well.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1141	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Change Requested	Freshwater Lakes: A lake or stream buffer width should consist of three zones at a minimum of 55 feet. Zone 1: Trees and shrubs , other vegetation; Zone 2: focuses on nutrient uptake (20’ (provides for wildlife corridors), Zone 3: tall grasses or herbaceous cover.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1142	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevlopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.B. mitigation sequencing, compensatory mitigation (SMP 19.400.110 Mitigation: A. Mitigation Sequencing, B. Mitigation Options, C. Mitigation Compliance.) The county must stress Avoidance in mitigation first. We ask the county to achieve no net loss by 1) standing firm on Avoidance (to keep our critical ecological functions from being degraded in the first place and requiring a complete review of all potential impacts); 2) Holding the aquaculture industry accountable for the plastics and micro-plastics pollution from bags and nettings they use; 3) Ensuring developers provide full and effective compensatory mitigation including surveys and analyses for adverse cumulative impacts.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1143	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	Q-Will the SMP require high enough replacement ratios so mitigation can replace functions lost? Q-Will the SMP state: ? <ul style="list-style-type: none">• Mitigation shall be carefully designed to replace all ecological functions lost by development.• Mitigation shall be located in an area where it can function.• Mitigation shall be monitored and maintained until fully established	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1144	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.B. shoreline vegetation buffers; setbacks 19.400.110. Q-When buffer widths are reduced in size, can the county prove mitigation actually results in no net loss of environmental functions?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1145	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Policy Question	Buffer Width Increases Q-Will increased buffer widths be required when a site has conditions that require protecting habitat functions and values? For example, to protect habitats or species identified in the county code, or when adjacent land has slopes or minimal vegetative cover, or tree blowdown?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1146	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	B.1 General Mitigation Standards	Policy Question	Buffer Width Increases Q-Will the county require a proposed Forest Practice activity that deviates from the standard buffer to apply for a development permit? Will the county allow such a deviation without a permit?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1147	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	General Feedback / No Specific Section	Change Requested	Aquaculture The overarching focus for aquaculture practices must be avoidance or minimization of negative impacts. The County must establish monitoring procedures to ensure aquaculture operations are in compliance with permit conditions. The Army Corps of Engineer’s 2017 NWP 48-Aquaculture permit did not include their own Draft Cumulative Impacts Analysis in the final NWP. The draft describes what will likely happen if industrial scale aquaculture permitting is allowed to continue. The NWP has not changed during at least two renewal periods. Corps permits are intended to result in minimal CIA. The analysis determined significant adverse impacts by industrial aquaculture on habitat acreage, eelgrass salmon, bull trout, sturgeon, and forage fish (on which salmon and Orca feed) in the marine ecosystem.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1148	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	General Feedback / No Specific Section	Change Requested	Aquaculture Additionally, the Corps noted aquaculture could violate State requirements under the SMA to achieve no net loss of eelgrass, and the ESA for the protection of eelgrass; therefore, “the proposed action is not consistent with either of these requirements.” The Corps failed in their responsibilities to regulate the industry; will the County fill the Corps’ gaps, and regulate the aquaculture industry accordingly? The use of plastic by the aquaculture industry is pervasive, and will increase, along with significant adverse effects to native eelgrass, forage fish and their marine habitats, with its Industrial expansion along coastlines, sounds, and in estuaries. All at a net loss of ecological functions.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1149	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	General Feedback / No Specific Section	Change Requested	Aquaculture Prohibit, or severely limit, new aquaculture structures, in accordance with Hearing Examiner Judge Bjorgen’s 2011 decision, which stated: the placement of tubes and netting structures on the beach in geoduck operations constitute construction of a structure, and consequently, a development.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1150	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	General Feedback / No Specific Section	Change Requested	Aquaculture Geoduck aquaculture, to mitigate for site impacts during harvest, must minimize the turbidity to, and total suspended solids in, the water column that risk impacting aquatic vegetation and the intertidal bed. Safely relocate existing embedded natural rocks and natural woody debris to adjacent plot outside the grow-out bed and enhance with additional natural materials to mitigate loss of habitat structure. The county must consider a financial guarantee from aquaculture operators to ensure buffers containing vegetation/sea life around aquaculture installations remain intact.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1151	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDev_elopment_Activities	General Feedback / No Specific Section	Change Requested	Aquaculture A qualified independent third party consultant shall monitor vegetation density and bed size prior to any site work from planting to harvest, plus one post-harvest growing period. The 5 environmental groups insist the county require buffers for the aquaculture industry’s use of shorelines that must be consistent with the Shoreline Management Act, the shoreline master program, and Best Available Science. Is the county including (it must!) Aquatic standard buffers in the Buffer Width section and environmental designation table?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1152	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	General Feedback / No Specific Section	Change Requested	The county’s SMP must include this SAV Table:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1153	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	1. A setback of ten feet from the property line of adjoining tidelands must be observed to avoid trespass on neighboring properties during aquaculture operations. 2. A ten-foot buffer zone should be required around established native eelgrass beds, or where native eelgrass is present at densities greater than 4 leaf shoots (turions) per square meter. No geoduck planting or other operational activities will be undertaken within this buffer zone. The county reserves the right to increase or decrease this buffer as new data become available on environmental effects.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1154	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	3. Employ 185-foot buffers around all native aquatic vegetation beds to protect both native aquatic vegetation and fish, marine mammals, birds and other native animal life that depend on the beds for one or more of their life histories. (Naval requirement) 4. Locate geoduck aquaculture away from sand dollar beds and native shellfish beds, and separate with at least a 185-foot buffer to protect native animal life from impacts due to aquaculture activities. 5. Prevent all entry during site work, including barges and equipment, into native aquatic vegetation beds and buffers.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1155	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.J. Public Access We recognize the benefits of creating access for the public, yet we are concerned about the extent to which public access is used instead of mitigation, and the type of mitigation used: How does the county intend to achieve no net loss if it allows developers to require public access as a way to reduce the amount of required mitigation by 50% ? Who will manage all this public access? Monitor these conservation easements? Who funds this monitoring and management? What are “measures” from public access projects that mitigate impacts to ecological functions?	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1156	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.1.J. Public Access Adverse environmental impacts to shoreline ecological processes and functions resulting from public access should preclude public access. Do not allow public access if it creates impacts that would need to be mitigated. Allowing a developer to reduce his mitigation by half by including public access is an ineffective way to protect ecological functions. Reducing mitigation by half would create a rush of developers placing public access to avoid having to mitigate. Unmanaged, public access can create a net loss of environmental functions. Cutting an area in half - with no buffer, surrounded by development - is not the way to create a conservation easement, it degrades the habitat. Such a reduction does not limit uses to protect an area’s conservation values or ecological functions.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1157	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.2.A. Vegetation Clearing The county must prioritize retaining vegetation or replanting for all development, uses, or activities, whether a permit is required or not, inside or outside a buffer. Why is mitigation for lawns halved? Including public access in a development by removing lawn should not reduce a permit’s mitigation up to 50%. If a large property has one acre or more of grass, under Thurston’s scenario, the developer may not mitigate enough to show no net loss. Lawn is a combination of exotic, sometimes invasive, vegetation. Most turf grasses are native to Europe.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1158	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.2.A. Vegetation Clearing Planting natives in small areas surrounded by non-native vegetation, with no shade, and/or no regular maintenance, could be expected to fail. The County must consider increasing the lawn mitigation requirement to at least 75%. Replacing only half a lawn to account for loss of a reduced Standard buffer width increases damage and loss to environmental functions. Residential buffer widths of only 50 feet cannot withstand any more such reduction.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1159	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.2.A. Vegetation Clearing Thurston County would benefit from using EPA’s Tiered Mitigation Program, based on EPA’s methodology for functions, which supersedes the current wetland methodology approach, rather than Kitsap’s Mitigation Option, which includes a provision for public access that halves mitigation.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1160	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.2.A. Vegetation Clearing EPA’s approach: A Function-Based Framework for Stream Assessment & Restoration Projects; Section 404 of the Clean Water Act/ Permitting Discharges of Dredge or Fill Material US EPA https://www.epa.gov/cwa-404/function-based-framework-stream-assessmentrestoration-projects The goal of tiered mitigation is to insure existing stream functions are not lost from a watershed. By establishing an acre as the standard, city and many urban properties have less mitigation and therefore, less costs.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1161	4-Feb-19	Anne Van Sweringen, Environmental Groups and Residents	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	B.2.A. Vegetation Clearing Pierce County's Tiered Mitigation strategy removed the issue that lawns provide no shade and are primarily exotic vegetation. Recommended by Futurewise, the county's approach used simpler requirements for minor projects, and customized requirements for larger projects under 1,000 square feet, called an "Abbreviated Planting Plan." Projects that affect 1,000 square feet or more must conduct a Habitat Assessment Study. More complex projects with additional mitigation requirements must submit a Habitat Assessment Report. In this time of climate change and sea level rise happening more quickly, increasingly large and fast floods from increasing impervious surfaces, and more net losses of ecological functions, costs to the County and its citizens could increase dramatically in the next 5 or 10, not 20 years.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1162	4-Feb-19	Townsend	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Thank you for your response to our question at the December 19, 2018 Thurston County Open House. We asked you if any geoduck operation permit applications had ever been denied in Thurston County. You responded in your January 3, 2019 email that to you knowledge, none had been denied. We appreciate your response. Attached is a letter detailing our concerns and comments related to this issue.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1163	4-Feb-19	Townsend	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	We hope that our comments and supporting documents will contribute to further dialog with the Thurston County Planning Department, the Board of Commissioners, the Planning Commissioners, environmental groups in South Puget Sound and concerned citizens. [Comment also included scientific journal articles 1. Industrial Aquaculture and the Politics of Resignation - Rigby et al 2. Why bartering biodiversity fails - Walker et al]	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1164	27-Feb-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter researched recent legal findings which concluded that the Washington State Superior Court (heard by Judge Gary Tabor) affirmed that tubes and nets used in geoduck facilities are structures. The judge disagreed with the WA State Attorney General's earlier opinion on the subject and affirmed that Thurston County was acting correctly in requiring a Shoreline Substantial Development Permit (SSDP) for geoduck operations. The judge also confirmed that Thurston County is not bound to follow the Washington State Department of Ecology guidelines when making this determination. Copies of both Hearing Examiner Bjorgen's decision and Judge Tabor's decision are attached to the e-mail.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1165	5-Mar-19	Futurewise	Email	AA_General_Feedback	General Feedback / No Specific Section	Support	Thank you for the opportunity to comment on the Shoreline Master Program (SMP) Draft Update. Futurewise strongly supports the update. The southern resident orcas, or killer whales, are threatened by (1) an inadequate availability of prey, the Chinook salmon, "(2) legacy and new toxic contaminants, and (3) disturbance from noise and vessel traffic."1 "Recent scientific studies indicate that reduced Chinook salmon runs undermine the potential for the southern resident population to successfully reproduce and recover."2 A 2018 analysis by the National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife ranked the Southern Puget Sound fall Chinook stocks that originate in the Nisqually and Deschutes River systems highest in importance as food sources for the southern resident killer whales.3 The Shoreline Master Program update is an opportunity to take steps to help recover the southern resident orcas, the Chinook salmon, and the species and habitats on which they depend. We support improving protections for these key species such as improved regulations to manage hard shoreline armoring and improved protections for shoreline vegetation.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1166	5-Mar-19	Futurewise	Email	AA_General_Feedback	General Feedback / No Specific Section	Support	Therefore, we strongly support the shoreline master program update. We do have suggestions to improve the update discussed below. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including Thurston County.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1167	5-Mar-19	Futurewise	Email	AE_General_Goals_and_Policies_300	110 Vegetation Conservation	Support	The SMP update has many good provisions. We want to highlight some of the best provisions: The vegetation conservation goal and policies in proposed 19.300.110. Retaining native vegetation in shorelines jurisdiction is important to maintaining no net loss of shoreline ecological functions.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1168	5-Mar-19	Futurewise	Email	AE_General_Goals_and_Policies_300	145 Transportation and Utilities	Support	The SMP update has many good provisions. We want to highlight some of the best provisions: Calling for carrying out the Alliance for a Healthy South Sound's (AHSS) South Sound Strategy through the shoreline master program and its implementation. This will better protect water quality and water quantity.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1169	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	130 Historic, Archeological, Cultural, Scientific and Educational Resources (HASCE)	Support	The SMP update has many good provisions. We want to highlight some of the best provisions: Proposed 19.400.130B.'s requirement that sites with known or potential archaeological resources require a site inspection by a professional archaeologist. This will significantly improve protections for archaeological resources and save permit applicants time and money because the risk of having their project stopped for archaeological work will be reduced.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1170	5-Mar-19	Futurewise	Email	AG_Permit_Provisions_Review_and_Enforcement_500	105 Procedure	Support	The SMP update has many good provisions. We want to highlight some of the best provisions: Proposed 19.500.105K.'s monitoring provisions. These provisions are needed to determine if the Shoreline Master Program is achieving no net loss. These provisions are required the Shoreline Master Program Guidelines.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1171	5-Mar-19	Futurewise	Email	AB_Introduction_100	110 Purpose	Change Requested	Summary of Key Recommendations: Please correct the descriptions of critical areas and their status under the Shoreline Management Act in proposed 19.100.110. Please see page 3 of this letter for the detailed recommendation.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1172	5-Mar-19	Futurewise	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Summary of Key Recommendations:</p> <p>The Shoreline Management Act (SMA), in RCW 90.58.610, provides that “RCW 36.70A.480 governs the relationship between shoreline master programs and development regulations to protect critical areas that are adopted under chapter 36.70A RCW.” RCW 36.70A.480(5) provides that the “[s]horelines of the state shall not be considered critical areas under this chapter except to the extent that specific areas located within shorelines of the state qualify for critical area designation based on the definition of critical areas provided by RCW 36.70A.030(5) and have been designated as such by a local government pursuant to RCW 36.70A.060(2).”</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1173	5-Mar-19	Futurewise	Email	AB_Introduction_100	110 Purpose	Change Requested	<p>Summary of Key Recommendations:</p> <p>Proposed 19.100.110 in the third paragraph is unclear as to whether the Growth Management Act (GMA) definitions identify critical areas as RCW 90.58.610 and RCW 36.70A.480(5) require. So we suggest that the last sentence in the third paragraph of Proposed 19.100.110 be revised to read as follows with our additions double underlined and deletions double struck through. Although Washington’s shorelines may contain critical areas, the shorelines themselves are not critical areas by default as unless they meet the definitions in the defined by GMA.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1174	5-Mar-19	Futurewise	Email	AB_Introduction_100	120 Applicability	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please clarify shoreline master program jurisdiction to include shorelands, floodways, flood plains adjacent to floodways, lakes 20 acres in size, and streams with a mean annual flow of 20 cubic feet per second consistent with the Shoreline Management Act (SMA). Please see pages 4 and 5 of this letter for the detailed recommendation.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1175	5-Mar-19	Futurewise	Email	AB_Introduction_100	120 Applicability	Change Requested	<p>Summary of Key Recommendations:</p> <p>The shoreline master program applies to all shorelines and shorelands in unincorporated Thurston County.⁷ The GMA divides unincorporated Thurston County within the county’s jurisdiction into three broad categories: urban, rural, and natural resource lands. We are concerned that proposed 19.100.120D may inadvertently be interpreted as exempting natural resource lands from the jurisdiction of the shoreline master program (SMP). In addition, the SMA allows cities to predesignate lands within their urban growth areas. Once annexed, these predesignations apply to the annexed land. In this case, no amendment is required to apply the city SMP to those areas. So, we suggest that proposed 19.100.120D be revised with our additions double underlined and deletions double struck through.</p> <p>[D. This Master Program shall apply to all unincorporated land within Thurston County until such time as a city incorporates land into their city boundaries through annexation and, if necessary, an SMP amendment.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1176	5-Mar-19	Futurewise	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>Summary of Key Recommendations:</p> <p>Clarify proposed 19.200.100A. Shoreline Jurisdiction to comply with the jurisdiction of the Shoreline Management Act.</p> <p>The Thurston County SMP applies to unincorporated Thurston County. In addition, RCW 90.58.030(2)(e) provides in full that:</p> <p>[(e) “Shorelines” means all of the water areas of the state, including reservoirs, and their associated shorelands, together with the lands underlying them; except (i) shorelines of statewide significance; (ii) shorelines on segments of streams upstream of a point where the mean annual flow is twenty cubic feet per second or less and the wetlands associated with such upstream segments; and (iii) shorelines on lakes less than twenty acres in size and wetlands associated with such small lakes; ...]</p> <p>So, rivers and streams with a flow of 20 cubic feet per second are within shoreline jurisdiction. But proposed 19.200.100A.2. requires the mean annual flow to be more than 20 cubic feet per second. We recommend that proposed 19.200.100A be modified so it is consistent with RCW 90.58.030(2)(e).</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1177	5-Mar-19	Futurewise	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>Summary of Key Recommendations:</p> <p>Clarify proposed 19.200.100A. Shoreline Jurisdiction to comply with the jurisdiction of the Shoreline Management Act.</p> <p>In addition, RCW 90.58.030(2)(e) provides that the “shorelands” associated with the waters of the state are “shorelines” and therefore within the minimum required shoreline jurisdiction. RCW 90.58.030(2)(d) defines shorelands providing that:</p> <p>[(d) “Shorelands” or “shoreland areas” means those lands extending landward for two hundred feet in all directions as measured on a horizontal plane from the ordinary high water mark; floodways and contiguous floodplain areas landward two hundred feet from such floodways; and all wetlands and river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of this chapter; the same to be designated as to location by the department of ecology.</p> <p>(i) Any county or city may determine that portion of a one-hundred-year-flood plain to be included in its master program as long as such portion includes, as a minimum, the floodway and the adjacent land extending landward two hundred feet therefrom.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1178	5-Mar-19	Futurewise	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>Summary of Key Recommendations:</p> <p>Clarify proposed 19.200.100A. Shoreline Jurisdiction to comply with the jurisdiction of the Shoreline Management Act.</p> <p>In addition, RCW 90.58.030(2)(e) provides that the “shorelands” associated with the waters of the state are “shorelines” and therefore within the minimum required shoreline jurisdiction. RCW 90.58.030(2)(d) defines shorelands providing that:</p> <p>[(d) “Shorelands” or “shoreland areas” means those lands extending landward for two hundred feet in all directions as measured on a horizontal plane from the ordinary high water mark; floodways and contiguous floodplain areas landward two hundred feet from such floodways; and all wetlands and river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of this chapter; the same to be designated as to location by the department of ecology.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1179	5-Mar-19	Futurewise	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>Summary of Key Recommendations:</p> <p>Proposed 19.200.100A.5. seems to have confused the shorelands concept and the requirement to include floodways which may extend beyond 200 feet from the ordinary high water mark. RCW 90.58.030(2)(d) requires that both be included in the minimum shoreline jurisdiction. Proposed 19.200.100 also omits river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of the SMA which are part of the minimum jurisdiction of the shoreline master program.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1180	5-Mar-19	Futurewise	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>So we recommend that proposed 19.200.100A. be modified to comply with RCW 90.58.030(2)(e) and RCW 90.58.030(2)(d). Our recommended additions are double underlined and our recommended deletions are double struck through.</p> <p>A. The Shoreline Master Program jurisdiction applies to all shorelines of the state in unincorporated Thurston County and their associated shorelands. This includes:</p> <ol style="list-style-type: none">1. All marine waters;2. Rivers and streams with 20 cubic feet per second (cfs) or greater mean annual flow;3. Lakes and reservoirs 20 acres and greater in area;4. Associated wetlands to 1 thru 3 above;5. Those lands extending landward for two hundred feet in all directions as measured on a horizontal plane from the ordinary high water mark of the water bodies listed in 1 thru 3 above;6. Buffers necessary to protect critical areas that are located within shoreline jurisdiction as described in this program;7. Floodways and contiguous floodplain areas landward two hundred feet from such floodways; and8. River deltas associated with the streams, lakes, and tidal waters listed in 1 thru 3 above.]	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1181	5-Mar-19	Futurewise	Email	AD_Shoreline_Jurisdiction_and_Environment_Designation_200	100 Shoreline Jurisdiction	Change Requested	<p>Finally, given the important habitat value of flood plains and the danger they present to development,¹¹ we recommend that shoreline jurisdiction include the full 100-year flood plain as authorized in RCW 90.58.030(2)(d)(i). This will improve protection for the Chinook salmon on which the Southern Resident Orcas depend. To implement this recommendation, the proposed 19.200.100A.7. would be substituted with our recommended additions double underlined.</p> <p>[7. The one-hundred-year -flood plains associated with the streams, lakes, and tidal waters listed in 1 thru 3 above; and]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1182	5-Mar-19	Futurewise	Email	AC_Definitions_150	590 No Net Loss	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please clarify the definition of no net loss in proposed 19.150.590 so it is consistent with the Shoreline Master Program (SMP) Guidelines. Please see page 4 of this letter for the detailed recommendation.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1183	5-Mar-19	Futurewise	Email	AC_Definitions_150	590 No Net Loss	Change Requested	<p>Summary of Key Recommendations:</p> <p>The Shoreline Master Program (SMP) Guidelines require the application of no net loss on an individual use or project basis, not as some countywide “aggregate.”⁸ This can be seen in WAC 173-26-201(2)(e)(i) which provides in relevant part that “[t]o assure no net loss of shoreline ecological functions, master programs shall include provisions that require proposed individual uses and developments to analyze environmental impacts of the proposal and include measures to mitigate environmental impacts not otherwise avoided or mitigated by compliance with the master program and other applicable regulations.” The second, third, and fourth sentences of the definition of no net loss comply with WAC 173-26-201(2)(e)(i). We particularly appreciate the third sentence’s recognition that no net loss applies at multiple scales, this scientifically correct and is recognized by the SMP Guidelines.⁹ However, the first sentence does not comply with WAC 173-26-201(2)(e)(i) because it treats no net loss as an aggregate when the SMP Guidelines require it to be applied function by function and project by project throughout the county’s shorelines. This is not to say that offsite mitigation is not allowed, it can be where that mitigation replaces all lost functions. So, we suggest that proposed 19.150.590 be revised with our deletions double struck through.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1184	5-Mar-19	Futurewise	Email	AC_Definitions_150	590 No Net Loss	Change Requested	<p>Summary of Key Recommendations:</p> <p>[19.150.590 No Net Loss: the maintenance of the County’s shoreline ecological functions. The no net loss standard requires that the impacts of shoreline development and/or use, whether permitted or exempt, be identified and prevented or mitigated such that there are no resulting adverse impacts on ecological functions or processes. Each project shall be evaluated based on its ability to meet the no net loss requirement. The no net loss standard applies at multiple scales, starting at the project site. Compensatory mitigation standards include sequencing guidelines to ensure the most appropriate mitigation type and site are selected, as close to the impacted location as possible.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1185	5-Mar-19	Futurewise	Email	AE_General_Goals_and_Policies_300	115 Water Quality and Quantity	Change Requested	<p>Summary of Key Recommendations:</p> <p>Modify Policy SH-18 to maintain water quality as the SMP Guidelines require. Please see page 7 of this letter for the detailed recommendation.</p> <p>The SMP Guidelines, in WAC 173-26-186(8)(b), provides that “[l]ocal master programs shall include policies and regulations designed to achieve no net loss of those ecological functions.” Shoreline ecological functions include the “maintenance of water quality.”¹² Unfortunately, rather than maintaining water quality, proposed Policy SH-18 provides that shoreline uses should minimize impacts that contaminate surface or ground water. Minimizing contamination will not maintain water quality. So we recommend that Policy SH-18 be revised to read as follows with our additions double underlined and our deletions double struck through.</p> <p>[A. Policy SH-18 Shoreline use and development shall not contaminate surface or ground water, cause adverse effects on shoreline ecological functions, or impact aesthetic qualities and recreational opportunities, including, but not limited to, healthy shellfish harvest, swimming, and boating.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1186	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	115 Critical Areas	Change Requested	Summary of Key Recommendations:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Adopt improved landslide hazard requirements to better protect people and property. Please see page 8 of this letter for the detailed recommendation.		
							Thurston County, like many other cities and counties along Puget Sound, is susceptible to landslides. For example, the 1999 landslide at Carlyon Beach and Sunset Beach damaged 49 homes to the extent that they were uninhabitable. ¹⁴ The losses were not covered by homeowners insurance.		
1187	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	115 Critical Areas	Change Requested	The SMP Guidelines, in WAC 173-26-221(2)(c)(ii)(B), provide: “Do not allow new development or the creation of new lots that would cause foreseeable risk from geological conditions to people or improvements during the life of the development.” Landslides are a type of geological hazards that can result in major impacts to people and property.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Summary of Key Recommendations:		
							The March 22, 2014, Oso landslide “claimed the lives of 43 people, making it the deadliest landslide event in United States history. Of the approximately 10 individuals who were struck by the landslide and survived, several sustained serious injuries.” ¹⁶ So properly designating geologically hazardous areas and protecting people from geological hazards is very important.		
1188	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	115 Critical Areas	Change Requested	Summary of Key Recommendations:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							It is important to understand that homeowner’s insurance does not cover the damage from landslides. “Insurance coverage for landslides is uncommon. It is almost never a standard coverage, and is difficult to purchase inexpensively as a policy endorsement.” ¹⁷ The Carlyon Beach and Sunset Beach landslide losses were not covered by homeowners insurance. ¹⁸ None of the Oso victims’ homes were covered by insurance for landslide hazards. ¹⁹ And that is common when homes are damaged by landslides. ²⁰ For example, on March 14, 2011, a landslide damaged the home of Rich and Pat Lord. ²¹ This damage required the homeowners to abandon their home on Norma Beach Road near Edmonds, Washington. Because their homeowner’s insurance did not cover landslides, they lost their home. ²² This loss of what may be a family’s largest financial asset is common when homes are damaged or destroyed by landslides or other geological hazards.		
							Landslide buyouts are rare and when they occur the property owner often only recovers pennies on the dollar. The property owners bought out after the Aldercrest-Banyon landslide in Kelso, Washington destroyed their homes received 30 cents on the dollar. ²³ This underlines why preventing development in geologically hazardous areas is just plain ordinary consumer protection.		
1189	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	115 Critical Areas	Change Requested	Summary of Key Recommendations:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Landslides are capable of damaging commercial, residential, or industrial development at both the tops and toes of slopes and on the sides of landslides due to the earth sliding and other geological events. So the areas at the top, toe, and sides of the slope are geological hazards. We recommend these areas be designated as landslide hazards.		
							Summary of Key Recommendations:		
1190	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	115 Critical Areas	Change Requested	We recommend that the regulations require review of any landslide capable of damaging the proposed development. Geological hazards, such as landslides are capable of damaging property outside the hazard itself. The 1949 Tacoma Narrows Landslide ran out 1,500 feet into Puget Sound. ²⁵ The 2014 Oso slide ran out for over a mile (5,500 feet) even through the slope height was 600 feet. ²⁶ A 2006 landslide at Oso traveled over 300 feet. ²⁷ Recent research shows that long runout landslides are more common than had been realized. ²⁸ This research documents that over the past 2000 years, the average frequency of long runout landslides in the area near the Oso landslide is one landslide every 140 years. ²⁹ The landslides ran out from 787 feet to the 5,500 feet of the 2014 landslide. ³⁰ So we recommend that Thurston County require review of all geological hazards capable of harming a proposed lot or building site.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Summary of Key Recommendations:		
							Do not limit landslide buffers to 50 feet or the buffer in Thurston Coutny Code Section (TCC) 24.15.015B		
1191	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	115 Critical Areas	Change Requested	Landslides in Thurston County and Western Washington are capable of running out significant distances. The 1949 Tacoma Narrows Landslide, in Tacoma, “failed catastrophically along steep” 300 feet high bluffs and ran out 1,500 feet into Puget Sound. ³¹ This is five times the buff height. The 2014 Oso slide ran out for over a mile (5,500 feet) even through the slope height was 600 feet. ³² This was nine times the slope height. The 2013 Ledgewood-Bonair Landslide on Whidbey Island extended approximately 300 feet into Puget Sound. ³³ In a study of shallow landslides along Puget Sound from Seattle to Everett, the average runout length was 197.5 feet (60.2 m) and the maximum runout length was 771 feet (235 m). ³⁴ So limiting landslide buffers to 50 feet or the buffer in Thurston County Code Section (TCC) 24.15.015B. will not adequately protect people and property.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Summary of Key Recommendations:		
							The Joint SR 530 Landslide Commission recommends identifying “[c]ritical area buffer widths based on site specific geotechnical studies” as an “innovative development regulation[.]” that counties and cities should adopt. ³⁵ So we support the landslide buffer requirement in TCC 24.15.015C. that is based on the minimum distance recommended by the geotechnical professional. Construction should not be allowed in these areas.		
1192	5-Mar-19	Futurewise	Email	AF_General_Reg ulations_400	120 Vegetation Conservation Buffers	Change Requested	Summary of Key Recommendations:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Include vegetation conservation requirements consistent with the SMA and SMP Guidelines. See proposed 19.400.120A on page *8.		
							As the State of Washington Court of Appeals has concluded, “[i]n adopting the Master Program guidelines, [Ecology] adopted the phrase ‘no net loss of ecological functions’ as a guiding principle for considering whether or not to approve local government programs. WAC 173-26-186(8)(d). In construing this principle, the Master Program guidelines acknowledge that any development has potential for ‘actual, short-term or long-term impacts’ and that mitigation and other measures can assure the ‘end result will not diminish the shoreline resources and values as they currently exist.’ WAC 173-26-201(2)(c).” ³⁶ As the court of appeals also wrote “reasonable and appropriate uses should be allowed on the shorelines only if they will result in no net loss of shoreline ecological functions and systems. See RCW 90.58.020; WAC 173-27-241(3)(j).”		

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1193	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Summary of Key Recommendations:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Include vegetation conservation requirements consistent with the SMA and SMP Guidelines. Please see page 11 of this letter for the detailed recommendation.		
							Marine riparian vegetation includes “salt-tolerant vegetation on beaches or tidal flood plains, to forest communities that grow along the shoreline and on adjacent bluffs. Despite this variability, these communities share two common characteristics; they are directly influenced by the marine environment, and they directly or indirectly influence nearshore aquatic habitat.		
1194	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Removing or disturbing this native vegetation results in reduced ecological functions as does decreasing the width of the vegetated riparian area, reducing plant density, and reducing plan diversity.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Summary of Key Recommendations:		
							Include vegetation conservation requirements consistent with the SMA and SMP Guidelines. Please see page 11 of this letter for the detailed recommendation.		
1195	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Riparian vegetation contributes to the foodweb by providing large woody debris and organic matter, important to many species, and creates habitat for insects and marine invertebrates that are important food sources for fish and other aquatic life.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Vegetation in tidal plains provides refuge for juvenile salmon and shades shallow water to maintain cooler temperatures that are necessary for the survival of salmon and other species. Large trees, which shade the upper intertidal zone is especially important for maintaining forage fish spawning habitat.		
							Summary of Key Recommendations:		
1196	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Include vegetation conservation requirements consistent with the SMA and SMP Guidelines. Please see page 11 of this letter for the detailed recommendation.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							“Stream riparian ecosystems include the riparian zone, active floodplain including riverine wetlands, and terraces, and the adjacent uplands that contribute matter and energy to the active channel or floodplain”41 The “[p]rotection and restoration of riparian ecosystems continues to be critically important because: a) they are disproportionately important, relative to area, for aquatic species, e.g., salmon, and terrestrial wildlife, b) they provide ecosystem services such as water purification and fisheries-related economic activity (Naiman and Bilby 2001; NRC 2002; Richardson et al 2012), and c) they respond to and interact with watershed-scale processes to help create and maintain aquatic habitats and the other ecosystem services.”		
							Summary of Key Recommendations:		
1197	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Include vegetation conservation requirements consistent with the SMA and SMP Guidelines. Please see page 11 of this letter for the detailed recommendation.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							To protect shoreline riparian vegetation and the species, such as the Chinook salmon and the orcas, depend on it, the policy of the Shoreline Management Act, in RCW 90.58.020, “contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life” Also recognizing the need to protect these species, the SMP Guidelines, in WAC 173-26-221(5)(b), require that “[m]aster programs shall include: Planning provisions that address vegetation conservation and restoration, and regulatory provisions that address conservation of vegetation; as necessary to assure no net loss of shoreline ecological functions and ecosystem-wide processes, to avoid adverse impacts to soil hydrology, and to reduce the hazard of slope failures or accelerated erosion.” “Local governments may implement these objectives through a variety of measures, where consistent with Shoreline Management Act policy, including clearing and grading regulations, setback and buffer standards, critical area regulations, conditional use requirements for specific uses or areas, mitigation requirements, incentives and nonregulatory programs.”43 Shoreline ecological functions include shoreline vegetation and habitat for native aquatic and shoreline-dependent mammals and anadromous and resident native fish, which include Chinook salmon and orcas.		
							Summary of Key Recommendations:		
1197	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Include vegetation conservation requirements consistent with the SMA and SMP Guidelines. Please see page 11 of this letter for the detailed recommendation.	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							WAC 173-26-221(5)(c) provides that:		
							[Master programs shall implement the following requirements in shoreline jurisdiction. Establish vegetation conservation standards that implement the principles in WAC 173-26-221(5)(b). Methods to do this may include setback or buffer requirements, clearing and grading standards, regulatory incentives, environment designation standards, or other master program provisions. Selective pruning of trees for safety and view protection may be allowed and the removal of noxious weeds should be authorized.]		
1197	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Note that WAC 173-26-221(5)(c) requires vegetation conservation standards in addition to buffers. Unfortunately, the SMP update does not include effective vegetation conservation standards. While proposed 19.400.120A.3. requires mitigation sequencing and avoidance for development within shoreline jurisdiction, there are no limits on vegetation removal outside of buffers and no mitigation for vegetation removal outside buffers.45 So we recommend that limits on vegetation removal be required outside buffers. As is also explained below, mitigation must be required for the loss of vegetation within shoreline jurisdiction	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1198	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt aquatic buffers in proposed 19.400.120 consistent with Management Recommendations for Washington's Priority Habitats. Please see page 14 of this letter for the detailed recommendation.</p> <p>2016 State of Our Watersheds: A Report by the Treaty Tribes in Western Washington shows that forest cover is declining in parts of Thurston County including within shoreline jurisdiction. This adversely impacts salmon habitat. “Minimizing forest cover removal to reduce long-term impacts is a ‘key strategy for protecting habitat’” in the Puget Sound Salmon Recovery Plan.47 The National Marine Fisheries Service has “identified degraded riparian areas as a limiting factor to the recovery of Chinook salmon.” The recovery of the Chinook is necessary to enable the southern resident orca population to successfully reproduce and recover.</p> <p>To protect species such as the Chinook salmon and the orcas, the policy of the Shoreline Management Act, in RCW 90.58.020, “contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life” Also recognizing the need to protect these species, the SMP Guidelines, in WAC 173-26-221(5)(b), require that “[m]aster programs shall include: Planning provisions that address vegetation conservation and restoration, and regulatory provisions that address conservation of vegetation; as necessary to assure no net loss of shoreline ecological functions and ecosystem-wide processes, to avoid adverse impacts to soil hydrology, and to reduce the hazard of slope failures or accelerated erosion.” Shoreline ecological functions include shoreline vegetation and habitat for native aquatic and shoreline-dependent mammals and anadromous and resident native fish, which include Chinook salmon and orcas.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1199	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt aquatic buffers in proposed 19.400.120 consistent with Management Recommendations for Washington's Priority Habitats. Please see page 14 of this letter for the detailed recommendation.</p> <p>Shoreline “[v]egetation conservation includes activities to protect and restore vegetation along or near marine and freshwater shorelines that contribute to the ecological functions of shoreline areas.”51 Shoreline master programs “shall” “[e]stablish vegetation conservation standards that implement the principles in WAC 173-26-221(5)(b). Methods to do this may include setback or buffer requirements, clearing and grading standards, regulatory incentives, environment designation standards, or other master program provisions.” The SMP Guidelines, in WAC 173-26-221(5)(b), also provide in part that “[i]n establishing vegetation conservation regulations, local governments must use available scientific and technical information, as described in WAC 173-26-201(2)(a). At a minimum, local governments should consult shoreline management assistance materials provided by the department and Management Recommendations for Washington's Priority Habitats, prepared by the Washington state department of fish and wildlife where applicable.”</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1200	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt aquatic buffers in proposed 19.400.120 consistent with Management Recommendations for Washington's Priority Habitats. Please see page 14 of this letter for the detailed recommendation.</p> <p>The State of Washington Department of Fish and Wildlife has recently updated the priority habitat and species recommendations for riparian areas. The updated management recommendations document that fish and wildlife depend on protecting riparian vegetation and the functions this vegetation performs such as maintaining a complex food web that supports salmon and maintaining temperature regimes to name just a few of the functions.</p> <p>To maintain riparian functions, the updated Riparian Ecosystems, Volume 1: Science synthesis and management implications scientific report recommends protecting the riparian ecosystem which has a width estimated to be “one Site-Potential Tree Height (SPTH) measured from the edge of the channel, channel migration zone or active floodplain; it also includes wetlands and steep slopes associated with this area. Protecting functions within at least one SPTH is a scientifically supported approach if the goal is to protect and maintain high function of the riparian ecosystem.” The report defines site-potential tree height (SPTH) as the “average maximum height of the tallest dominant trees (200 years or more) for a given site class.” For Thurston County, the stream length-weighted third quartile 200-year SPTH is 235 feet.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1201	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt aquatic buffers in proposed 19.400.120 consistent with Management Recommendations for Washington's Priority Habitats. Please see page 14 of this letter for the detailed recommendation.</p> <p>We recommend that shoreline jurisdiction be expanded to include the 100-year flood plain and that the buffers for river and stream shoreline be increased to use the newly recommended 200-year SPTH of 235 feet and that this width should be measured from the edge of the channel, channel migration zone, or active floodplain whichever is wider. This will help maintain shoreline functions and Chinook habitat.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1202	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt aquatic buffers in proposed 19.400.120 consistent with Management Recommendations for Washington's Priority Habitats. Please see page 14 of this letter for the detailed recommendation.</p> <p>As was documented in the prior recommendation, Protecting Nearshore Habitat and Functions in Puget Sound documents marine riparian vegetation is important to maintaining the health of Puget Sound. Removing or disturbing this native vegetation results in reduced ecological functions as does decreasing the width of the vegetated riparian area, reducing plant density, and reducing plan diversity. The widths of marine riparian vegetation necessary to provide the functions listed above vary with the function. To maintain a 100 percent of the delivery of large organic debris is estimated to require approximately 200 feet of marine riparian vegetation. Most of the leaf litter and other organic matter that reaches Puget Sound is from vegetation 100 to 200 feet from the sound.</p> <p>Shading forage fish spawning habitat can require 56 – 125 feet of marine riparian vegetation to maintain 80 percent of the shaded area.63 Protecting Nearshore Habitat and Functions in Puget Sound documents that protecting wildlife habitats requires buffers 240 to 902 feet wide. Removing 99 percent of the sediment for runoff requires 984 feet of riparian vegetation. To effectively perform these functions, the riparian vegetation needs to be undisturbed and undeveloped native vegetation.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1203	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt aquatic buffers in proposed 19.400.120 consistent with Management Recommendations for Washington's Priority Habitats. Please see page 14 of this letter for the detailed recommendation.</p> <p>“[R]esearch shows that there is no particular impervious area threshold where degradation in stream integrity begins to occur; rather, the relationship is a continuum.” “Degradation can occur at even low levels of total impervious area ...” The Thurston Regional Planning Council and Thurston County studied the “impacts of planned growth under current plans” in the basins that make up the Deschutes Watershed. Every basin in the watershed will experience moderate or high increases in total impervious area (TIA) at buildout. “The [i]mpacts of [p]lanned [g]rowth” put every basin “[p]ossibly at risk of further impacts” or “[a]t risk of further impacts.”71As was documented above, current regulations are not maintaining riparian forests and their decline is harming the Chinook salmon and orcas.</p> <p>Our recommended buffers will reduce the potential for future adverse impacts to both fresh water and marine shorelines. We urge you to adopt our recommended buffers for non-water dependent uses.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1204	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Require wider setbacks between development and critical areas and critical areas buffers in areas subject to wildfire danger.</p> <p>Setbacks from critical areas buffers provide an area in which buildings can be built, repaired, and maintained without having to intrude in the buffer. So, setbacks cannot be ended after construction. The statement “[t]he building setback is to protect the buffer during construction and is no longer required after construction is completed” in proposed 19.400.120B.4. on page *9 should not be adopted.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1205	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>Summary of Key Recommendations:</p> <p>Require wider setbacks between development and critical areas and critical areas buffers in areas subject to wildfire danger.</p> <p>Setbacks also allow for the creation of a Home Ignition Zone that can protect buildings from wildfires and allow firefighters to attempt to save the buildings during wildfires. Thurston County averages 63 wildfires per year. The county “can expect at least one fire exceeding 100 acres over the next 25 years.” Since a 30-foot-wide Home Ignition Zone is important to protect buildings, we recommend that Shoreline Management Program require a setback at least 30 feet wide adjacent to critical areas and shoreline and critical area buffers in areas at high risk of wildfires. High risk areas are identified on Table 4.5.1 and on Map 4.5.4 of the 3rd Edition Hazards Mitigation Plan for the Thurston Region. Combustible structures, such as decks, should not be allowed within this setback to protect the building from wildfires.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1206	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	140 Bulk and Dimension Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt a ten percent impervious surface limit for the Rural Conservancy shoreline environment consistent with the SMP Guidelines to protect shoreline ecological functions. Please see page 17 of this letter for the detailed recommendation.</p> <p>Table 19.400.140(A) in Note 4 indicates that Hard Surface thresholds for Shoreline Environmental Designations are in Section 19.400.125. But Section 19.400.125 does not include any hard surface limits. The Thurston County Drainage Design and Erosion Control Manual referenced in Section 19.400.125 calls on project applicants to limit impervious surface to the minimum necessary, but it does not include impervious surface limits.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1207	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	140 Bulk and Dimension Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt a ten percent impervious surface limit for the Rural Conservancy shoreline environment consistent with the SMP Guidelines to protect shoreline ecological functions.</p> <p>Impervious surfaces are increasing in some areas of Thurston County outside urban growth areas including within shoreline jurisdiction. The Chinook Recovery Plan for South Sound identified an objective to promote land-use practices that prevent stormwater flows. This objective calls for the reservation of native land cover and natural drainage systems, while limiting the area and connectivity of impervious surfaces." The Thurston Regional Planning Council and Thurston County studied the "impacts of planned growth under current plans" in the basin that make up the Deschutes Watershed. Every basin in the watershed will experience moderate or high increases in total impervious area (TIA) at buildout. "The impacts of [p]lanned [g]rowth" put every basin "possibly at risk of further impacts" or "[a]t risk of further impacts." Many Thurston County basins already have impervious surfaces greater than ten percent. These include the West Bay, Chambers, Mission Creek, Indian Creek, Percival Creek, Schneider, Capitol Lake, Moxile Creek, Green Cove Creek, Squaxin Passage, Woodard, and Woodland basins. Many basins are likely to be covered by more than five or ten percent impervious surfaces in the coming years.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1208	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	140 Bulk and Dimension Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please adopt a ten percent impervious surface limit for the Rural Conservancy shoreline environment consistent with the SMP Guidelines to protect shoreline ecological functions.</p> <p>To prevent adverse impacts on and degradation of shoreline ecological functions, WAC 173-26-211(5)(b)(ii)(D) requires rural conservancy shoreline environments to limit impervious surfaces to ten percent of the lot. The proposed SMP does not include any impervious surface limits for the Rural Conservancy environment. This is inconsistent WAC 173-26-211(5)(b)(ii)(D) and will result in continuing adverse impacts shoreline ecological functions. A ten percent maximum imperious surface limit is required for the Rural Conservancy environment.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1209	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	<p>Summary of Key Recommendations:</p> <p>Protect people, property, and habitat from sea level rise and increased coastal erosion. Please see page 18 of this letter for the detailed recommendation.</p> <p>The Shoreline Management Act and Shoreline Master Program Guidelines require shoreline master programs to address the flooding that will be caused by sea level rise. RCW 90.58.100(2)(h) requires that shoreline master programs “shall include” “[a]n element that gives consideration to the statewide interest in the prevention and minimization of flood damages ...” WAC 173-26-221(3)(b) provides in part that “[o]ver the long term, the most effective means of flood hazard reduction is to prevent or remove development in flood-prone areas ...” The areas subject to sea level rise are flood prone areas just the same as areas along bays, rivers, or streams that are within the 100-year flood plain.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1210	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	<p>Summary of Key Recommendations:</p> <p>Protect people, property, and habitat from sea level rise and increased coastal erosion. Please see page 18 of this letter for the detailed recommendation.</p> <p>Sea level rise is a real problem that is happening now. Sea level is rising and floods and erosion are increasing. In 2012 the National Research Council concluded that global sea level had risen by about seven inches in the 20th Century.⁸⁵ The new report Projected Sea Level Rise for Washington State – A 2018 Assessment projects that for a low greenhouse gas emission scenario there is a 50 percent probability that sea level rise will reach or exceed 1.9 feet by 2100 for Budd Inlet including Boston Harbor. Projected Sea Level Rise for Washington State – A 2018 Assessment projects that for a higher emission scenario there is a 50 percent probability that sea level rise will reach or exceed 2.3 feet by 2100 for Budd Inlet including Boston Harbor. Projections are available for all of the marine shorelines in Washington State. The general extent of the projected sea level rise currently projected for coastal waters can be seen on the NOAA Office for Coastal Management Digitalcoast Sea Level Rise Viewer available at: https://coast.noaa.gov/digitalcoast/tools/slr.html</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1211	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	<p>Summary of Key Recommendations:</p> <p>Protect people, property, and habitat from sea level rise and increased coastal erosion. Please see page 18 of this letter for the detailed recommendation.</p> <p>Projected sea level rise will substantially increase flooding. As Ecology writes, “[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion— thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems.” Not only our marine shorelines will be impacted, as Ecology writes “[m]ore frequent extreme storms are likely to cause river and coastal flooding, leading to increased injuries and loss of life.”</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1212	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	<p>Summary of Key Recommendations:</p> <p>Protect people, property, and habitat from sea level rise and increased coastal erosion. Please see page 18 of this letter for the detailed recommendation.</p> <p>A peer-reviewed scientific study ranked Washington State 14th in terms of the number of people living on land less than one meter above local Mean High Water compared to the 23 contiguous coastal states and the District of Columbia. This amounted to an estimated minimum of 18,269 people in 2010. Zillow recently estimated that 31,235 homes in Washington State may be underwater by 2100, 1.32 percent of the state’s total housing stock. The value of the submerged homes is an estimated \$13.7 billion.⁹² Zillow wrote:</p> <p>["It’s important to note that 2100 is a long way off, and it’s certainly possible that communities [may] take steps to mitigate these risks. Then again, given the enduring popularity of living near the sea despite its many dangers and drawbacks, it may be that even more homes will be located closer to the water in a century’s time, and these estimates could turn out to be very conservative. Either way, left unchecked, it is clear the threats posed by climate change and rising sea levels have the potential to destroy housing values on an enormous scale."]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1213	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	<p>Summary of Key Recommendations:</p> <p>Protect people, property, and habitat from sea level rise and increased coastal erosion. Please see page 18 of this letter for the detailed recommendation.</p> <p>Sea level rise will have an impact beyond rising seas, floods, and storm surges. The National Research Council wrote that:</p> <p>["Rising sea levels and increasing wave heights will exacerbate coastal erosion and shoreline retreat in all geomorphic environments along the west coast. Projections of future cliff and bluff retreat are limited by sparse data in Oregon and Washington and by a high degree of geomorphic variability along the coast. Projections using only historic rates of cliff erosion predict 10–30 meters [33 to 98 feet] or more of retreat along the west coast by 2100. An increase in the rate of sea-level rise combined with larger waves could significantly increase these rates. Future retreat of beaches will depend on the rate of sea-level rise and, to a lesser extent, the amount of sediment input and loss."]</p> <p>A recent paper estimated that “[a]nalysis with a simple bluff erosion model suggests that predicted rates of sea-level rise have the potential to increase bluff erosion rates by up to 0.1 m/yr [meter a year] by the year 2050.” This translates to four additional inches of bluff erosion a year.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1214	5-Mar-19	Futurewise	Email	AF_General_Regulations_400	150 Flood Hazard Reduction Measures	Change Requested	<p>Summary of Key Recommendations:</p> <p>Protect people, property, and habitat from sea level rise and increased coastal erosion. Please see page 18 of this letter for the detailed recommendation.</p> <p>Homes built today are likely to be in use 2100. And new lots created today will be in use in 2100. This is why the Washington State Department of Ecology recommends “[l]imiting new development in highly vulnerable areas.” Therefore, we recommend that the SMP update require that new lots and new buildings be located outside the area of likely sea level rise and if that is not possible, buildings should be elevated above the likely sea level rise. We recommend the following new regulations be added to the SMP update in proposed 19.400.150B:</p> <p>[8. New lots shall be designed and located so that the buildable area is outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands will likely migrate during that time.</p> <p>9. Where lots are large enough, new structures and buildings shall be located so that they are outside the area likely to be inundated by sea level rise in 2100 and outside of the area in which wetlands and aquatic vegetation will likely migrate during that time.</p> <p>10. New and substantially improved structures shall be elevated above the likely sea level rise elevation in 2100 or for the life of the building, whichever is less.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1215	5-Mar-19	Futurewise	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Require mitigation for all losses of shoreline ecological functions including the adverse impacts of development outside of buffers as required by the SMP guidelines. Please see page 21 of this letter for the detailed recommendation.</p> <p>As the State of Washington Court of Appeals wrote “reasonable and appropriate uses should be allowed on the shorelines only if they will result in no net loss of shoreline ecological functions and systems. See RCW 90.58.020; WAC 173-27-241(3)(j).”</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1216	5-Mar-19	Futurewise	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Require mitigation for all losses of shoreline ecological functions including the adverse impacts of development outside of buffers as required by the SMP guidelines. Please see page 21 of this letter for the detailed recommendation.</p> <p>Proposed Appendix B B.1.D violates this requirement in two ways. First, by providing that “mitigation is not required for impacts outside of the Standard Buffer,” Appendix B B.1.D does not require any mitigation for adverse impacts within the water. No mitigation is required for in water fills, dredging, shading, or other impacts. This violates the principle of no net loss and will harm fish and wildlife habitat.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1217	5-Mar-19	Futurewise	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Require mitigation for all losses of shoreline ecological functions including the adverse impacts of development outside of buffers as required by the SMP guidelines. Please see page 21 of this letter for the detailed recommendation.</p> <p>Second, it also does not require mitigation for development in shorelines jurisdiction but outside buffers. For example, forest cover is declining in parts of Thurston County including within shoreline jurisdiction. This adversely impacts salmon habitat. “Minimizing forest cover removal to reduce long-term impacts is a ‘key strategy for protecting habitat’” in the Puget Sound Salmon Recovery Plan. As was discussed above, the proposed vegetation management regulations require avoidance and mitigation, but not mitigation. Allowing the removal of shoreline vegetation outside buffers will adversely impact shoreline ecological resources violating the no net loss requirement of the SMP Guidelines. To comply with the SMP Guidelines, the SMP Update must require mitigation vegetation loss and other adverse impacts of developments on shoreline ecological functions both inside and outside buffers.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1218	5-Mar-19	Futurewise	Email	AK_Appendix_B_Mitigation_Options_to_Achieve_No_Net_Loss_for_New_or_ReDevelopment_Activities	B.1 General Mitigation Standards	Change Requested	<p>Summary of Key Recommendations:</p> <p>Require mitigation for all losses of shoreline ecological functions including the adverse impacts of development outside of buffers as required by the SMP guidelines. Please see page 21 of this letter for the detailed recommendation.</p> <p>One way of making mitigation easier to implement and more effective is to develop a vegetation management manual with minimum requirements for planting plans and mitigation. Bainbridge Island has developed a mitigation manual the county could use as an example.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1219	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	105 Use and Modifications Matrix	Change Requested	<p>Summary of Key Recommendations:</p> <p>Prohibit marine net pen aquaculture for nonnative species in the Aquatic environment. Please see page 21 of this letter for the detailed recommendation.</p> <p>RCW 77.125.050(1) provides that the State of Washington Department of Natural Resources “may authorize or permit activities associated with the use of marine net pens for nonnative marine finfish aquaculture only if these activities are performed under a lease of state-owned aquatic lands in effect on June 7, 2018. The department may not authorize or permit any of these activities or operations after the expiration date of the relevant lease of state-owned aquatic lands in effect on June 7, 2018.” Consistent with RCW 77.125.050(1), proposed Table 19.600.105 should prohibit marine net pens for nonnative marine finfish aquaculture in the Aquatic environment.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1220	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	105 Use and Modifications Matrix	Change Requested	<p>Summary of Key Recommendations:</p> <p>In the Rural Conservancy environment only allow new structural shoreline stabilization and flood control works where there is a documented need to protect an existing structure as SMP Guidelines require. Please see page 22 of this letter for the detailed recommendation.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1221	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	105 Use and Modifications Matrix	Change Requested	<p>Summary of Key Recommendations:</p> <p>WAC 173-26-211(5)(b)(ii)(C), which applies to the Rural Conservancy environment, provides that:</p> <p>["(C) Construction of new structural shoreline stabilization and flood control works should only be allowed where there is a documented need to protect an existing structure or ecological functions and mitigation is applied, consistent with WAC 173-26-231. New development should be designed and located to preclude the need for such work."]</p> <p>Based on this requirement, we recommend new structural shoreline stabilization only be allowed in the Rural Conservancy environment to protect an existing structure or ecological functions. Recent studies in Puget Sound have documented that structural shoreline stabilization has significant adverse impacts on the local beach on which it is installed and on large areas of Puget Sound. So this change is necessary to maintain shoreline ecological functions.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1222	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please modify proposed 19.600.170B.7. to require public access consistent with the SMP Guidelines. Please see page 22 of this letter for the detailed recommendation.</p> <p>One of the policies of Washington’s Shoreline Management Act is to increase public access to publicly owned shorelines. Unfortunately, proposed 19.600.170B.7. does not fully comply with the SMA or the SMP Guidelines.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1223	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please modify proposed 19.600.170B.7. to require public access consistent with the SMP Guidelines. Please see page 22 of this letter for the detailed recommendation.</p> <p>The SMP Guidelines implement the Shoreline Management Act (SMA) policies by including more specific requirements for public access. These provisions include WAC 173-26-221(4)(d) which requires in part that:</p> <p>iii) Provide standards for the dedication and improvement of public access in developments for water-enjoyment, water-related, and nonwater-dependent uses and for the subdivision of land into more than four parcels. In these cases, public access should be required except:</p> <p>(A) Where the local government provides more effective public access through a public access planning process described in WAC 173-26-221(4)(c).</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1224	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please modify proposed 19.600.170B.7. to require public access consistent with the SMP Guidelines. Please see page 22 of this letter for the detailed recommendation.</p> <p>The SMP Guidelines implement the Shoreline Management Act (SMA) policies by including more specific requirements for public access. These provisions include WAC 173-26-221(4)(d) which requires in part that:</p> <p>iii) Provide standards... except:</p> <p>(B) Where it is demonstrated to be infeasible due to reasons of incompatible uses, safety, security, or impact to the shoreline environment or due to constitutional or other legal limitations that may be applicable.</p> <p>In determining the infeasibility, undesirability, or incompatibility of public access in a given situation, local governments shall consider alternate methods of providing public access, such as off-site improvements, viewing platforms, separation of uses through site planning and design, and restricting hours of public access.</p> <p>(C) For individual single-family residences not part of a development planned for more than four parcels.</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1225	5-Mar-19	Futurewise	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Change Requested	<p>Summary of Key Recommendations:</p> <p>Please modify proposed 19.600.170B.7. to require public access consistent with the SMP Guidelines. Please see page 22 of this letter for the detailed recommendation.</p> <p>Shoreline master programs, including the Thurston County SMP Update, must include public access requirements that are consistent with the SMA and the SMP Guidelines. Thurston County’s proposed SMP update does not fully comply with these requirements because proposed 19.600.170B.7. allows joint or community access in place of public access. So, we recommend that proposed 19.600.170B.7. be modified to read as follows:</p> <p>["7. New multi-residential development, including the subdivision of land for five or more parcels, shall provide for community public access, except where demonstrated to be infeasible due to any of the following:"]</p> <p>[no further recommended amendments to proposed 19.600.170B.7.]</p>	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1226	5-Mar-19	Futurewise	Email	AL_Appendix_C_Shoreline_Restoration_Plan	General Feedback / No Specific Section	Change Requested	Summary of Key Recommendations:	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
							Include all required elements in the Shoreline Restoration Plan. Please see page 23 of this letter for the detailed recommendation.		
							WAC 173-26-201(2)(f) provides that: Consistent with principle WAC 173-26-186 (8)(c), master programs shall include goals, policies and actions for restoration of impaired shoreline ecological functions. These master program provisions should be designed to achieve overall improvements in shoreline ecological functions over time, when compared to the status upon adoption of the master program. The approach to restoration planning may vary significantly among local jurisdictions...		
							If Appendix C is intended to be the Shoreline Restoration Plan, we are concerned that the requirements of WAC 173-26-201(2)(f)(i), (iii), (iv), and (vi) have not been addressed. We recommend that they be addressed.		
1227	5-Mar-19	Futurewise	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	SOUTHERN RESIDENT KILLER WHALE PRIORITY CHINOOK STOCKS Analysis Source provided a side report on the conceptual model for prey prioritization of SRKWs	Forwarded to Planning Commission. Item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1228	6-Mar-19	Phyllis Farrell	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	I am concerned about the County's trend of converting shorelines to other uses. The SMP guidelines (WAC 173-26-186(8) provide for development standards and use regulations designed to achieve no net loss of shoreline ecological functions. The Thurston County SMP is an important tool for the County to protect our shorelines for fish and wildlife as well as public enjoyment. The SMP needs to uphold no net loss at a minimum, and should be proactive and aim for “net gain”.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1229	6-Mar-19	Phyllis Farrell	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	Buffers: Shoreline buffers are important management tools which protect and provide benefits to water quality and habitat. With climate change causing sea level rise, I am astounded in the draft Chapter 19.400 that buffers have been reduced. Shortened buffers will impair “no net loss” of ecological function! Current standard SMP buffer widths or setbacks should not be modified or reduced.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1230	6-Mar-19	Phyllis Farrell	Email	AF_General_Regulations_400	110 Mitigation	Change Requested	Mitigation: Encourage long-term net gains in both program planning and project specific designs when conducting mitigation sequencing (avoiding, then minimizing, finally compensating for impacts). Require compensatory mitigation to occur in the same habitat area for gain in the same ecological functions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1231	6-Mar-19	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	105 Use and Modifications Matrix	Change Requested	Aquaculture: Aquaculture's use of shorelines must be consistent with the regulations of the Shoreline Management Act (SMA) , the Shoreline Master Program and Best Available Science. A water dependent use, aquaculture is polluting our shorelines with plastics and will increase with industry expansion. Industrial aquaculture has taken over many of our coves and inlets, altering the habitat, reducing biodiversity, and posing threats to nearshore habitat for eelgrass and forage fish, threatening salmon and Orca recovery. Aquaculture operations have been allowed to destroy habitat when preparing shellfish beds, endanger native species & wildlife (starfish, crabs, birds and sea mammals) with plastic netting, and disrupt the substrate with high pressured hoses when harvesting (without hydraulic permits!) A 2017 Army Corp of Engineers draft Cumulative Impact Analysis concluded: “Given the magnitude of the impacts in acreage, the importance of eelgrass to the marine ecosystem, and the scale of the aquaculture impacts relative to other stressors, the impacts are considered significant.” http://users.neo.registeredsite.com/3/7/5/12218573/assets/2017_NWP48_Draft_Cumulative_Impact_Analysis.pdf Although this report was not released (heavy lobbying to bury it?), the science, results and recommendations are valid. It's the Army Corps' own scientists, research and report!	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1232	6-Mar-19	Phyllis Farrell	Email	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	B. Policy SH-23 Water-oriented economic development, such as those aquaculture activities encouraged under the Washington Shellfish Initiative, should be RESTRICTED, (not encouraged) and shall be carried out in such a way as to minimize adverse effects and mitigate unavoidable adverse impacts to achieve no net loss of shoreline ecological function. SHOULD BE MODIFIED TO READ: restricted I also noticed in Chapter 19.600 that Aquaculture operations will be allowed under “C”, conditional use permits. I thought recent court judgments required SDPs for geoduck operations. How is this being reconciled? Limit industrial aquaculture expansion to protect forage fish habitat and salmon/Orca recovery. Ban hydraulic harvesting practices or require an HPA permit Limit/phase out the use of marine plastics.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1233	6-Mar-19	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	130 Commercial Development	Change Requested	Climate Change: Sea level rise associated with climate change may result in efforts to increase armoring (shoreline modifications and development) which often negatively affects spawning sites of forage fish and shortens buffers. The Puget Sound Partnership has identified a goal to remove more shoreline armoring in Puget Sound than is constructed between 2011 and 2020. Limit armoring projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1234	19-Mar-19	John Carpenter	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	160 Mooring Structures and Activities	Change Requested	I would like to register my support for the recommendations of the Thurston County Shoreline Stakeholder Coalition as submitted to the Planning Commission.. I believe the Commission should seriously consider the suggestions on piers and floats and dollar values to keep updated with inflation and State regulations. A high priority should be put upon protecting existing uses/structures.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1235	19-Mar-19	Townsend	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Other	Stakeholder states the SMP does not adequately address losses to the relevant ecosystems. Provided information on unpublished 2017 Army Corps of Engineers (ACOE) Cumulative Impact Analysis on aquaculture. Provided information on Bjorgen and Tabor decisions that concluded geoduck operations are "developments" because they involve "structures."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item
1236	19-Mar-19	Townsend	Planning Commission Meeting	AE_General_Goals_and_Policies_300	100 Shorelines of Statewide Significance	Other	Stakeholder states that Section 300 and Appendix C have language that supports protection of shorelines but believes that section 600 contradicts that protection.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Future Discussion Item

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1237	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Other	Stakeholder asks PC to ask CPED staff about: 1. What efforts have been made by the CPED to notify TC citizens about work sessions? 2. Will community stakeholder meetings resume?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1238	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AA_General_Fee dback	General Feedback / No Specific Section	Other	Stakeholder believes that the current draft of the SMP has not done enough to "increase flexibility for it's citizens" per the charge of the BoCC.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1239	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Reg ulations_400	100 Existing Development	Change Requested	All legally constructed homes and appurtenant structures shold be considered "conforming" rather than "legally nonconforming".	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1240	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provi sions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	Add "remodel and/or reconstruction" to Chapter 19.500.100.C.3.b (exemptions from SDPs) to be congruent with the language changes in 19.400.100.B.1.b and e.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1241	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Reg ulations_400	110 Mitigation	Change Requested	Staff should consider positive, as well as negative, impacts to shoreline ecological function. When considering mitigation for a development the County must consider more thahn only the negative impacts to shoreline ecological function. If there is a positive impact, the development should be exempt from a SDP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1242	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	160 Mooring Structures and Activities	Change Requested	Establish freshwater requirements for piers, floats, wharves and bulkheads to adress unique habitat characteristics. CPED staff should acknowledge that the fresh and marine waters are differen, and consider removing grating requirements (Ch 19.600.160.C.1.r) for lake projects.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1243	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provi sions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	The dollar threshold exemption for wharves, piers and floats on fresh water should be increased. Currently at \$10,000 but Ecology's Shoreline Permitting Manual states, "In fresh waters, if the fair market value of the dock does not exceed.... \$10,000 for all other docks constructed in fresh waters."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1244	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AG_Permit_Provi sions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	Take action to exempt development, repair and maintenance of single-family residences and appurtenances from the County's proposed new "written approvals" process.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1245	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Change Requested	Language should be added to the SMP to protect existing uses, as well as structures. Residential use is a preferred use according to the State's Shoreline Master Act and the County's SMP should reflect this fact in the mitigation requirements.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1246	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Reg ulations_400	110 Mitigation	Change Requested	Remove limits from mitigation banking to motivate property owners to voluntarily improve shoreline function.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1247	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	175 Shoreline Stabilization	Change Requested	Recognize the significant damage to shoreline ecological function on freshwater lakes due to higher water levels and 4-foot waves. The SMP should allow modifications of bulkheads to protect the existing shoreline from erosion.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1248	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	Allow decks in the buffer. Decks and patios are currently allowed in the County building and land use codes.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1249	20-Mar-19	Shoreline Stakeholder Coalition, John Woodford, Chairman	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	Allow landward development within the buffer across the entire width of a residence. This is allowed by Ecology, no need for the County to limit this development to 500 square feet. The 500 square foot limit was originally adopted by the city of Spokane, then arbitrarily picked-up and used by other jurisdictions.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1250	17-Apr-19	Phyllis Farrell	Planning Commission Meeting	AE_General_Goals_and_Policies_300	120 Economic Development	Change Requested	<p>The South Sound Sierra Club Group is concerned about the County's trend of converting shorelines to favor industrial aquaculture.</p> <p>B. Policy SH-23 "Water-oriented economic development, such as those aquaculture activities encouraged under the Washington Shellfish Initiative, should be encouraged and shall be carried out in such a way as to minimize adverse effects and mitigate unavoidable adverse impacts to achieve no net loss of shoreline ecological functions."</p> <p>"Encouraged" should be changed to "limited" due to the industry's harmful practices in bed preparation (scraping, removal of sand dollars, starfish and eelgrass), the use of heavy equipment on fragile beaches, plastic pollution with pvc pipes and netting, the spraying of pesticides and herbicides and hydraulic harvesting disrupting the substrate.</p> <p>I urge a careful review of industry practices to limit expansion and more rigorous environmental protections in order to favor shoreline ecological function and public access and recreation of our public waters. Too much of Thurston County's shorelines has been diverted to a monoculture that is a significant risk to our forage fish habitat so important to salmon and Orca recovery.</p> <p>We are not opposed to shellfish aquaculture, but advocate for environmentally responsible practices which should be specified in the SMP. On behalf of the South Sound Sierra Club Group, representing over 2400 members, I urge you to incorporate these recommendations when finalizing the Thurston County Shoreline Master Plan.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1251	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	<p>First document of packet: Certified Shoreline Management Permit issued by Thurston County for "approval of a shoreline substantial development permit to operate a commercial intertidal geoduck operation on 1.1 acres of private tidelands." Project is located within a Conservancy shoreline designation.</p> <p>"Permit is granted pursuant to the Shoreline Management Act of 1971, and nothing in this Permit shall excuse the applicant from compliance with any other federal, state or local statutes, ordinances or regulations applicable to this project, but not inconsistent with the Shoreline Management Act."</p> <p>"...The Applicant shall ensure that all anti-predator nets and tubes are secured in place to prevent them from escaping from the project area."</p> <p>"...all activities related to the proposed geoduck bed shall be in substantial compliance with the site plan submitted and made part of the Staff report."</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1252	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Second document of packet: Data mapping of "Puget Sound Eelgrass Monitoring". Shows that eelgrass is relatively absent in Thurston, with some patches near Nisqually reach.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1253	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	<p>Third document of packet: Governor Jay Inslee's Shellfish Initiative - Looking Ahead to Shellfish Initiative Phase II. Following pieces have been highlighted:</p> <p>Aims of SI P2: "1. Ensure Clean Water." "4. Improve permitting processes to maintain and increase sustainable aquaculture."</p> <p>Key Successes: "Reopened shellfish beds", "streamlined permit process", "pollution reduction"</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1254	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	<p>Fourth document of packet: Governor Jay Inslee's Shellfish Initiative - Phase II Work Plan. Following pieces have been highlighted:</p> <p>Goal 1. Ensure clean water to protect and restore shellfish growing areas in Puget Sound and on the Coast "1.4. Support strategies to reduce sewer and stormwater outfalls to waters of the state. (DNR)"</p> <p>Goal 2. Embrace Strategies to Address Ocean Acidification's Impact on Shellfish "2.2 Understand how local, land-based contributions affect ocean acidification by:"</p> <p>Goal 3. Advance Vital Shellfish Research "3.3 Study the effects of Washington shellfish aquaculture operations (WSG)" "3.7 Review and research shellfish ecosystem services (PSI)" "3.8 Assess the economic contribution of shellfish farming and wild harvest in Washington"</p> <p>Goal 4. Improve the permitting process to maintain and grow sustainable aquaculture. "4.1 Programmatic biological assessment for federal permitting of shellfish activities (NOAA)" "4.2 Shellfish interagency permit team phase II (NOAA, ECY)" "4.3 Improve guidance for local shoreline master programs for shellfish aquaculture"</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1255	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	<p>Fifth document of packet: Governor Jay Inslee's Shellfish Initiative - Overview. Following pieces have been highlighted:</p> <p>Shellfish Initiative. 1. Create a public/private partnership for shellfish aquaculture. "Federal, state and local model permitting program" "Improve guidance for local shoreline master program"</p> <p>3. Ensure clean water to protect and enhance shellfish beds "Improve shellfish growing area protection and restoration efforts"</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1256	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	<p>Sixth document of packet: Puget Sound Eelgrass Monitoring Data Viewer</p> <p>Launch webpage for the data viewer discussed above. (Comment ID: 1252)</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1257	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	<p>Seventh document of packet: Cross Motion For Summary Judgment of the Hearing Examiner for Thurston County</p> <p>Taylor Shellfish appeal of determinations by the Thurston County Resource Stewardship Department that certain proposed geoduck aquaculture operations are "developments" under the state Shoreline Management Act.</p> <p>"On the third ground of the administrative determinations, whether the tubes and netting serve as an obstruction on the beach, summary judgment is granted in favor of the Appellants [shellfish company] on the issue of sedminment movement: the proposed operations are not developments due to their effect on the movement of sediments. Summary judgment is not entered at this time on the other issues relating to this third ground, due to the nexed for further examination of the public trust doctrine and review of whether any Shoreline Hearings Board decisions address whether the "placing of obstructions" includes obstructions to marine life."</p> <p>Summary of Order - 4. "The effect of the above decisions is that the proposed operations are deemed "developments" under the SMA under the first ground of the administrative determinations requiring a substantial development permit for the proposals.Thus... a hearing on a substantial permit is required for the proposed operations."</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1258	15-Apr-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	<p>Eighth document of packet: Shoreline Permitting Manual - Guidance for local governments, from the Department of Ecology. Following pieces have been highlighted:</p> <p>"The Board finds that, while these geoduck farms may cause very limited restrictions to recreating in very shallow water in the area of the farms when the PVC tubes are present, the impact from these restrictions on the public will be very minor."</p> <p>"The Legislature, in the SMA, has already made the decision that the minor, temporal and geographical limited restrictions from well-managed and -located geoduck farms are justified by their long-term benefit to the statewide interest."</p> <p>"It is the responsibility of geoduck farmers to properly manage and train their workers to prevent these situations."</p> <p>"No conditions were added because, in the County's view, impacts to recreational users would be unlikely."</p> <p>"The Board concludes that the Haley Farm SSDP is appropriately conditioned to restrict beach clearing activities that would cause impacts in violation of the SMA and SMP... the conclusion that impacts to the sand dollar population at Haley Beach will be temporary and insignificant."</p> <p>"...the conclusion that the Shellfish Companies intend to allowa ccess to their tidelands at Haley Farm for recreational purposes, consistent with their farming activities. The Board concludes that the Haley Farm will have little impact on the current legal access to the beach in the area, and therefore does not violate the SMA or SMP."</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1259	9-May-19	Phyllis Farrell	Email	AF_General_Reg ulations_400	120 Vegetation Conservation Buffers	Change Requested	<p>I have submitted previous testimony & written comments that shorelines (especially marine) need to be protected by buffers to ensure “no net loss” of ecological function and to protect forage fish habitat. With sea level rise, this is especially important to maintain, even increase the buffers...</p> <p>I urge marine buffers be maintained at a minimum, and be increased for new development.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1260	15-May-19	Elizabeth Rodrick	Email	AA_General_Fee dback	General Feedback / No Specific Section	Other	<p>Dear Andrew,</p> <p>In reviewing your memo dated May 9, 2019 on SMP Buffers, I noticed that you did not cite the following publications which are the most recent science on riparian ecosystems science and management.</p> <p>Riparian Ecosystems, Volume 1: Science synthesis and management implications. 2018. Timothy Quinn, George Wilhere and Kirk Krueger, (Managing Editors). A Priority Habitat and Species Document of the Washington Department of Fish and Wildlife, Olympia.</p> <p>Riparian Ecosystems, Volume 2: Management Recommendations. 2018. Amy Windrope, Timothy Quinn, Keith Folkerts, and Terra Rentz. A Priority Habitat and Species Document of the Washington Department of Fish and Wildlife, Olympia.</p> <p>I learned from WDFW that the Draft Volume 2 was released in May 2018 and is now in the final stages of review. I believe the draft was placed on the WDFW website for use because it had thorough advance peer review and they do not expect substantial revisions. The Washington Department of Ecology helped fund this study and I assume they will use it to update their guidance to local governments on the SMP and CAO.</p> <p>My questions are:</p> <p>1) Have reviewed these documents?</p> <p>2) Have you consulted either WDFW or WDOE on the use of them to update the Thurston County SMP?</p> <p>3) What advice did you receive?</p> <p>4) Will you use these documents in your next update of the CAO?</p> <p>I would appreciate a response to these questions and please copy the Planning Commission.</p>	<p>Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.</p> <p>Note: The Planning Commission has been blind-copied on the response to this message at the request of the message author.</p> <p>Hello Elizabeth,</p> <p>Thank you for your comments. We are aware that Volume 1 was published last year, and that a draft of Volume 2 is currently available for review, but unpublished. We will be discussing these documents with Ecology and WDFW with respect to the SMP update, and will bring information forward to the Planning Commission at a future meeting.</p> <p>We have not begun our next CAO update, but that project will also involve an updated review of scientific literature. I expect the updated WDFW riparian guidance will also be part of that literature review.</p> <p>Please feel free to check in with me as the SMP update moves forward.</p> <p>Regards,</p> <p>Andrew Deffobis, Associate Planner</p>	Pending / Item for Discussion
1261	15-May-19	Townsend	Planning Commissio n Meeting	AF_General_Reg ulations_400	100 Existing Development	Change Requested	<p>KT: Non-conforming, as a term, has a negative connotation. It will be much more likely to be abused through misunderstanding on the part of Thurston County Staff than the term "grandfathered." If "non-conforming" means "grandfathered," then the term "grandfathered" should be used in order to retain a clear and unequivocal meaning.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1262	15-May-19	Townsend	Planning Commissio n Meeting	AF_General_Reg ulations_400	100 Existing Development	Change Requested	<p>A. Existing Uses. 1.</p> <p>PT: This is a massive impact on shoreline homeowners. According to comments at the Planning Commission by a real estate progeSSIONal, this will require disclosure on all property transactions. There must be a way of grandfathering current conforming lawfully established uses.</p> <p>PT. This is extremely harsh to existing homeowners who have met all current laws related to uses. According to real estate professionals it will be necessary to disclosing the non-conforming status of a property in a sale transaction.</p> <p>PT: Whatever co nforming status is assignend to shore lands should be applied to development in tidelands.</p> <p>KT: It does appear to be legally presumptuous to define uses that have been legally conforming and with the flick of a pen, make them "non-conforming", however that term is interpreted by the current staff at Thurston County.</p> <p>KT: Non-conforming language should not be applied to residential structures. Residential structures, which have been "conforming" to this date, should be "grandfathered."</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1263	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	<p>A. Existing Uses. 4.</p> <p>PT: Why is this necessary? There are many cases where a house is vacant for a much longer period of time, or a planned land use takes a longer period to develop, This requirement would cast a large number of properties into a different use status. This point should be deleted.</p> <p>KT: On almost all shorelines, other than ports and parks, residential dwellings at this point are considered legally conforming. This sudden "conforming" to "non-conforming" definition places a burden on these property owners in terms of updating their homes, home additions, re-models, rebuilding after fire or other natural disaster. If these structures are placed on upland shoreline property owners, structures should also be placed on tideland property owners. Aquaculture installations can readily be considered a nuisance and a hazard to recreational water uses.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1264	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	<p>B.1.g.</p> <p>KT: The devastation of losing a home by fire or other disaster is multiplied by this restriction. Even if there is insurance for the disaster, rebuilding is enormously expensive. This restriction should be increased time wise to an over-all 10 year period.</p> <p>PT: Fire disrupts human lives adn financial resources. It may take years to fully recover and perform reconstruction. There should be no limit to the time required to apply for permits or complete reconstruction. This requirement only serves to increase the suffering of those who lose a home fire.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1265	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	<p>B.2. Existing Appurtenances to Single-Family Residences.</p> <p>PT: Again, this is incredibly harsh to homeowners who are legally conforming. See the points above. Existing appurtenances should be grandfathered into the new Program.</p> <p>PT: Why is there an exclusion of bulkheads, overwater structures and other shoreline modifications? Shoreline and tideland modifications are likely to have an increased level of impact to ecological conditions and processes. Why would they be excluded?</p> <p>KT: Why is there a distinction between "garages and sheds" and "shoreline modifications"?</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1266	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	<p>B.3. Vegetation standards.</p> <p>KT: "...except as required as mitigation for new and expanded development." What is the specific meaning of this related to any additions to residential homes?</p> <p>PT: See the ntoes above regarding renovations anda dditions to existing property and structures.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1267	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	<p>B.4. Structures, improvements, docks, fills or developments lawfully placed in or over water prior to December 4...</p> <p>PT: This section refers to existing "structures, improvements, docks, fills or developments lawfully placed in or over water prior to December 4, 1969...". The following sentence should be amended to "New in or over water structures are prohibited."</p> <p>KT: New Aquaculture "structures" should be prohibited as well. Judge Bjorgen, in his 2011 rules, defines geoduck aquaculture PVC pipes (43,000 per acre, totally approximately 7 miles and 16 tons of PVC) as "structures."</p> <p>KT: Such structures should be grandfathered rather than "non-conforming" since to this time such structures have been legally conforming.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1268	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	100 Existing Development	Change Requested	<p>C.1.Existing Lots</p> <p>PT: Why does this item include only land located landward of OHWM? Many shoreline properties include both shorelands and tidelands. It makes no sense toexclude tidelands from this item as they are more ecologically sensitive.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1269	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	<p>A. Location</p> <p>PT: How is it possible to predict "future shoreline stabilziation" needs? A new home or other structure may require shoreline stabilization due to natural events that are out of the control of the owner of the structure and which are not predictable. Examples include tidal erosion, earthquake, and other natural events.</p> <p>KT: "Down-current properties" should include tideland properties, which are impacted by dredging on tidelands utilized by geoduck operations. Silt and sediments from such dredging should not be allowed.</p> <p>KT: Geoduck aquaculture includes "dredging" and should be avoided.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1270	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	<p>A. Location. 1.</p> <p>PT: How is it possible to predict "future shoreline stabilziation" needs? A new home or other structure may require</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1271	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	<p>A. Location. 3.</p> <p>PT: See the comment on (2) above. "Steep slopes" is not defined."</p> <p>Note: There is no comment on steep slopes on this public comment document.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1272	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	<p>B. Standards for Work Waterward of OHWM.</p> <p>PT: This section is woefully inadequate to address standards for work waterward of OHWM. Numerous items should be added including tideland sediment disruption, threatened and endangered species protections, siltation in water, impacts on kep and macroalgae, restrictions on barge morring and tideland stranding, and so forth.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1273	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Standards for Work Waterward of OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							1. Water-dependent in-water...		
							PT/KT: Why are "water-dependent in-water structures, activities, and uses" not subject to any buffers? What is the basis for this item? Shorelines are critical ecological areas. Where is this item required or recommended by the ECY SMP handbook? Where is this required by current Washington RCWs and WACs (please cite relevant regulations)? This item should be deleted. KT: What restrictions are applicable to water-depended in-water structures, activities and uses? There is a clear need to establish common-sense restrictions for tideland modifications and activities.		
1274	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Standards for Work Waterward of OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							3. Projects involving in-water work must comply with timing restrictions as set forth by state and federal project approvals. PT: This needs more defintions. What timing restrictions would apply? Also, why would this item be called out when other regulations would specify this?		
							KT: Please provide said "timing restrictions as set forth by state and federal project approvals." This statement is too non-specific to be understood.		
1275	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Standards for Work Waterward of OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							4. Protection of bank and vegetation. a. KT: There is no definition of "in-water work" in Chapter 1. This is an ambiguous term. What would be an example of "alteration of distrurbance of the bank and bank vegetation" related to "in-water work?"		
1276	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Standards for Work Waterward of OHWM.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							4. Protection of bank and vegetation. b.		
							KT: There is no definition of "disturbed areas." What constitutes a "disturbance" or "alteration"? This is ambiguous terminology. PT: This is so vague as to be meaningless.		
1277	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	105 Proposed Development	Change Requested	B. Standards for Work Waterward of OHWM. 5.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							KT: Same objection: the term "water quality problems" is an ambiguous and meaningless term. What is the definition of "water quality problems" and what specific problems are being referred to? If the County is going to use ambiguous terms such as this, the term would definitely apply to commercial/industry aquaculture. The mantra of "shellfish clean the water" does not work for a CAFO operation such as a geoduck farm which plants some 129,000 geoduck seeds in a confined acre of tideland. A concentrated animal feeding operation (CAFO), as defined by the United States Department of Agriculture (USDA) is an animal feeding operation (AFO) - a farm in which animals are raised in confinement - that has over 1000 "animal units" confined for over 45 days a year). PT: This section is vague as to the meaning of "problems". Whgat water quality problems does this encompass? The release of silt due to planting and harvest activities?		
1278	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	A. Mitigation Sequencing. 1.a.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							KT: Why has this never been considered for industrial shellfish aquaculture? We do not know of a single permit that has been denied for industrial aquaculture. If this is a priority, where is the backbone of county officials to utilize the priority that is top of the list? Why should anyone believe authorities who do not follow with action their own priorities?		
1279	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	A. Mitigation Sequencing. 1.c.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							KT: Who will restore and who will pay for it? Taxpayers (as in the case of restoration in Puget Sound) or the party who caused the impact? Maybe a fund should be set up for restoration projects related industrial aquaculture on our shorelines and the industry required to pay a substantial restoration fee in advance of their project being permitted.		
1280	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	A. Mitigation Sequencing. 1.d.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							KT: "Preservation" would be an aspect of item (a), "Avoid the impact altogether." "Maintenance" is an ill-defined term that could mean anything. "Maintenance" must be defined.		
1281	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	A. Mitigation Sequencing. 1.e.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
							KT: Who pays compensation? This must be clarified and defined. Generally, it is the tax-payers who end up paying for impacts through restoration projects. This is unethical.		

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1282	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>A. Mitigation Sequencing.</p> <p>1.e.</p> <p>PT: Appropriate mitigation sequencing should vary by shoreline designation. It would be different for intensive development areas compared to conservancy areas. There may be sensitive areas where protection of the ecological condition is paramount, and no mitigation would be adequate. Other designated areas may allow for various levels of mitigation. This document should be restructured to take into account various designations of shorelines.</p> <p>KT: County Personnel have stated that htey do not monitor shoreline aquaculture installations (from personal conversation in Stakeholder meeting with Mike McKain). He stated that County personnel only go out to the site if there is an "incident" report. Specifically, who will monitor "impact and the mitigation projects and take appropriate corrective measures"? Unless this is a specified activity of county personnel, it is meaningless.</p> <p>KT: All the "mitigation measures' are ambiguous and unclear. #e. for example apparently means that imapcts to one area can be mitigated by restoration in another area. This means that financial benefits to one individual or entity related to imapcts in one area are compensated by taxpayer money in restoration elsewhere.</p> <p>KT: Another example of the ambiguity: #f What are "appropriate corrective measures?" This term is not defined in Chapter 100.</p> <p>KT: #f: What is the meaning of "monitor?" Which agency or department is responsible for monitoring and how many County employees have a job description which includes "monitoring the impact and the mitigation projects?" When we have called the COunty or DNR or any other Washington State Agency regarding such things as illegal mooring of barges in public waters, literally no agency and certainly not the County want to listen or deal with it.</p> <p>KT: This entire paragraph is truly "... a tale told by an idiot, full of sound and fury, signifying nothing." (Shakespeare, d. 1616)</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1283	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>A. Mitigation Sequencing.</p> <p>2.</p> <p>PT: This section should emphasize the protection of ecological functions. Change "shall not result in required mitigation in excess of that necessary..." to "shall not result in required mitigation less than that necessary..."</p> <p>KT: Which type of "no-net-loss' is being referred to ? Programmatic no-net-loss or project no-net-loss. This paragraph should be re-worded. It is unclear.</p> <p>KT: Specifically, how does the County measure "no net loss". THis paragraph puts into some kind of legal language the fact that "no net loss" policy prohibits mitigation beyond the strict meaning of "no net loss." In other words, it makes legal the idea that hte County has no legal intention of any kind of supporting a "net gain" to the shorelines of the county in terms of ecological function. The insertion by Brad Murphy of the term "net gain" into one of his presentations, we believe, only came as a result of citizens pointing out the fallacies of "no net loss" policy. It was a face saving measure, nothing else and the paragraph confirms that.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1284	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>B. Mitigation Options</p> <p>1.</p> <p>PT: This sentence is nonsense. Where is appendix B?</p> <p>KT: Since the County has chosen not to provide us with a copy of APpendix B to date, it is impossible to comment on this.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1285	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>B. Mitigation Options</p> <p>2. Site selections</p> <p>PT: Compensatory mitigation should explicitly exclude unrelated voluntary efforts by shoreline owners, environmental and conservation groups, or other efforts unrelated to the development.</p> <p>KT: Read this http://www.ecy.wa.gov/mitigation/landscapeplan.html</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1286	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>B. Mitigation Options</p> <p>3. Proposals</p> <p>PT: Change "may be required" to "are required"</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1287	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>B. Mitigation Options</p> <p>4.</p> <p>PT: See comment on (2) above.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1288	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>B. Mitigation Options</p> <p>5. Compensatory mitigation...</p> <p>PT: This provision, combined with the programmatic no net loss provisions, sets up the potential for an unscrupulous developer to game the system and engage in progressive destruction of ecological functions. Consider this scenario:</p> <p>Property owner A engages in restoration activity to improve ecological function.</p> <p>Property owner B wishes to engage in in-water development and uses the restoration performed on property A as part of a programmatic no net loss argument. Property B is developed.</p> <p>Property owner A one year later wants to develop an in-water project and uses the previous restoration as mitigation.</p> <p>The result is two ecologically degraded properties with a resulting defeat of the concept of no net loss. An unscrupulous operator could degrade many shoreline areas in a round-robin attack using this provision.</p> <p>This provision should be eliminated. Alternatively, restoration efforts should be banked to the individual property and in-lieu fees used to compensate for the restoration effort effectively providing an incentive for restoration without concomitant degradation of ecological functions and processes. Such restoration would not be a component of a programmatic no net loss strategy.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1289	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>C. Mitigation Compliance</p> <p>2.</p> <p>KT: Specifically, who (agency/department/personnel) does the actual monitoring and which department is responsible for writing the annual/scheduled monitoring reports. Please provide examples of "monitoring reports" from the last 10 years.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1290	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>C. Mitigation Compliance</p> <p>3.</p> <p>KT: Which department/personnel are responsible for review of alternative mitigation plan and authorization of said plan. Please provide County in-house rules related to this.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1291	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	110 Mitigation	Change Requested	<p>C. Mitigation Compliance</p> <p>4.</p> <p>KT: Please provide links to the electronic permit database.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1292	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>A. Incorporation of Title 24 TCC</p> <p>KT: I don't believe the County has provided Appendix E.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1293	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>D. Critical Saltwater Habitats</p> <p>1.</p> <p>KT: "Other human-made structures" should include "structures" (as defined in 2011 by Judge Bjorgen) that are made up of approximately 7 miles of PVC pipe weighing approximately 16 ton per acre, i.e., geoduck industrial aquaculture operations.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1294	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>D. Critical Saltwater Habitats</p> <p>1.a.</p> <p>KT:The "public" does not "need" industrial shellfish aquaculture and "public trust" is lost when the County colludes with the industrial aquaculture operators to fill our tidelands with miles/tons of PVC pipe along with dredging methods for harvest and tractors on the tidelands.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1295	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>D. Critical Saltwater Habitats</p> <p>1.c.</p> <p>KT: Is this "no net loss" on a project basis or a program basis? This needs to be specified. We submit the same critique of the fault "no net loss" policy that we have stated ins everal places elsewhere.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1296	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>D. Critical Saltwater Habitats</p> <p>1.d.</p> <p>KT: What is the State's definition of "resource protection" and "species recovery". These terms are not defined in Chapter 100.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1297	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	115 Critical Areas	Change Requested	<p>D. Critical Saltwater Habitats</p> <p>3.</p> <p>KT: Shellfish beds should be distinguished as to "natural shellfish beds" and "commercial/industrial shellfish beds." They are not the same thing and it is insupportable to lump them together. Commercial/industrial shellfish beds are not natural, they are not a "critical habitat" and replace critical habitat. Commercial/industrial shellfish beds are changing the nature of the tidelands especially since in different phases of the operations the area is a monoculture, the area contains up to 7 miles/16 tons of PVC plastics (obviously not natural to the habitat) and is dredged at harvest. This "lumping together" to confuse the issue is the type of language being used by the current administration in Washington DC to re-define normal meanings of language. This is the type of thing that that is both insidious and unconscionable and when it is inserted into a document such as this, it is a clear indication tha trational thought has been lost.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1298	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	A.. General Regulations 2. KT: The exception "when required as mitigation for new or expanded development" requires elaboration. Does this mean that if I build a room on to the back of my house then I no longer have retroactive protection for my existing vegetation and plantings?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1299	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	B. Buffer Widths 2.c. KT: The term "Net Gain" is not defined in Chapter 100.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1300	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	B. Buffer Widths D.2. KT: "Spot spraying" is not defined as to allowable substances. Are we talking more "vinegar" or about "Round-up" or about "Imidacloprid", etc.? This item requires much more specificity.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1301	15-May-19	Townsend	Planning Commission Meeting	AF_General_Regulations_400	135 View Blockage	Change Requested	B. Buffer Widths A.3. KT: This diagram doesn't make sense.If the structure is outside of the buffer, why would it have to be moved back to conform to another structure?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1302	31-May-19	Robert Jensen	Planning Commission Meeting	AA_General_Feedback	General Feedback / No Specific Section	Logistics	I have submitted comments suggesting the updated County Shoreline Master Program address the increasing presence of toxic blue-green blooms in the shoreline lakes in Thurston County We recently returned from living in Ecuador. Does the latest update of the program require regulations on septic systems that will combat this problem?	Staff responded on 6/6/2019.	No Action Required
1303	17-Jun-19	Taylor Shellfish, Audrey Lamb, Biological Project Manager	Email	AA_General_Feedback	General Feedback / No Specific Section	Other	Commenter provided a list of State Documents, Federal Documents, State Shoreline Hearings Board Decisions, and State and Acedemic individual human resources.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1304	13-Jul-19	Nicholas Kanui Worst	Email	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Policy Question	I recently purchased property on Pitman Lake with the intent of using the lake for swimming and fishing. Currently, it's zoned as Conservancy, meaning I can obtain a permit to create a gravel path to the lake through 1000-1500 feet of brush and hip deep marshland with an environmental mitigation plan. If it becomes zoned Natural, landfilling is not permitted at all, so a permanent path would be extremely difficult to create and maintain. I can't use the lake if I can't get to it and that seems unfair that I own part of it and pay taxes on it. I don't want a lake house or water ski on the lake but it would be nice to go swimming or paddle a canoe around during the summer. Please let me know what options I have.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1305	13-Jul-19	Carol Goss	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	4 changes. 1. Slow down the permitting process - to conduct a fact-finding process to determine facts from what may be savvy market campaigns for these permits by commercial enterprises. 2. In the interest of true transparency and full disclosure, provide posting that informs users of public lands and parks of such projects, including the scope and potential risks and provide a comment period to the publi - not just for the immediate neighborhood with the 500 ft mandate. 3. Conduct a thorough and unbiased study of hte report completed by the Army Corp of Engineers. 4. Research the big picture of the cumulative effect of all these becahes being converted from their natural state to industrial geoduck operations. Make commercial geoduck farming and other similar commercial enterprises a part of Governor Insee's orca recovery task force study. The task force is planning longer-term action recommendations for orca recovery and future sustainability.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1306	13-Jul-19	Julie Frick	Online Discussion Board	AA_General_Feedback	General Feedback / No Specific Section	Change Requested	Please establish guidelines about use of plastics in our Marine Environment.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1307	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	075 Permit Types Definitions	Policy Question	It looks like we are redefining standard permits and adding some, such as Administrative. Why not use standard terminology? That was your rationale for not wanting to call existing legal structures conforming.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1308	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	075 Permit Types Definitions	Policy Question	19.500.075.E: Does this mean a TYPE 5 permit requires a public hearing AND Ecology review? And, a Type 5 is an SDP?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1309	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Policy Question	19.500.100.A.2: If a structure of more than 35 ft in height is proposed and no views or views of less than a SUBSTANTIAL NUMBER OF RESIDENCES ARE UNAFFECTED will the permit be approved? Or, is this an absolute dictated by state law.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1310	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	<p>19.500.100.C.3.a: There needs to be a booklet put together that details what development can be done within the \$7047 allowable. There is precedence for this set by other governing agencies and would reduce confusion, time and cost to both the resident and the Planning Department without negatively impacting shoreline ecological function.</p> <p>How will this be administered? At the November 7, 2018 Planning Commission Meeting the Planning Department stated that an administrative permit would be required if just one board on a Pier, float or wharf needs to be replaced. In fact, according to the draft, any work “development” in the buffer or on the shoreline would need an Administrative Permit. If taken literally, home owners would even need to get a Letter of Exemption (a defacto Administrative permit) to mow their lawns, or plant/transplant native trees or bushes. See 19.500.100.A.5. If they didn’t get the permit, they would be committing a misdemeanor and could be arrested</p> <p>This paragraph focuses on Single Family. What about 2, 3 & 4+ unit housing? Does this need to be included her or elsewhere?</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1311	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	19.500.100.C.3.b: This exemption needs to include "Remodel" and "Reconstruction" within the original footprint. What happens within the footprint of the home should be governed by the Building Code not the SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1312	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	19.500.100.C.3.c: This paragraph needs to be expanded for lakes to include protection of the shoreline. If the waves wash away the shoreline the result is a significant loss of shoreline function which would not meet the "No net loss of shoreline function" required of the SMP.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1313	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	19.500.100.C.3.g: Shouldn’t this section include a disclaimer relative to the buffer/setback requirement?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1314	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	19.500.100.C.3.h.i: This should be eliminated. The permit fees would exceed \$2,500 let alone the cost of a consultant and contractor.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1315	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Change Requested	19.500.100.C.3.h.ii: The act allows a \$10,000 for a new freshwater float, or pier and \$20,000 for a replacement float or pier. Please revise this section to conform with the act.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1316	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Policy Question	19.500.100.D.2: This paragraph is confusing. Please explain.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1317	7-Aug-19	Doug Karman	Planning Commission Meeting	AG_Permit_Provisions_Review_and_Enforcement_500	100 Permit Application Review and Permits	Policy Question	19.500.100.H.4: Why is the effective date the date of filing vs the date of approval? The second part of the paragraph seems to move the effective date to after approval. Which is it?	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1318	30-Jul-19	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Thank you for your service at the upcoming SMP, please advocate for limiting/regulating industrial aquaculture in our Thurston County Shorelines. These practices are affecting forage fish and salmon/orca recovery. In particular, I am advocating a phaseout of the use of plastics and recommend the use of bamboo, wood, stainless steel for pvc pipe and rope/hemp for netting.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1319	17-Oct-17	Townsend	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Policy Question	<p>The proposed SMP changes the permitting type for geoduck aquaculture from the current Substantial Shoreline Development Permit (SSDP) to a Conditional User Permit (CUP). This seems extraordinarily inappropriate and misguided given that Thurston County initially determined that a SSDP permit was required for geoduck aquaculture due to the presence of plastic and net structures in the tideland. The decision by Thurston County was appealed by the shellfish industry, and the courts upheld the view of Thurston County. Thurston County expended considerable taxpayer resources developing and defending the requirement for an SSDP, and other counties followed this precedent. It appears to be an arbitrary and capricious action at this point to abandon the legal rulings, the monetary investment and all the study related to those rulings. Given the cumulative impact analysis of the Army Corps showing impacts of aquaculture on eelgrass, forage fish, and the ecosystem that includes endangered and threatened species like salmon and Southern Resident Killer Whales, it is ill-conceived that the County should arbitrarily change the regulations. The requirement for permitting is "no net loss."</p> <p>Please review the attached two documents from Judge Thomas R. Bjorgen and Judge Gary Tabor, who both ruled that PVC put into the tideland for geoduck farming constitutes a structure and therefore requires a shoreline substantial development permit. The question of the discrepancy in the Draft SMP Update between permitting of geoduck aquaculture requiring a CUP and other shellfish aquaculture requiring SSDP must also be explained.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1320	19-Sep-19	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>I want to reemphasize the need for language in this SMP that reflects the will of the County to design and regulate permissible shoreline impacts. The language in this plan may guide practices for many years. It is my understanding that if specific language is not in the SMP, the Shorelines Hearings Boards have no jurisdiction over the permit process. So your words count!</p> <p>I urge you to protect and maintain buffers, especially salt water shorelines threatened by sea level rise.</p> <p>You should consider "Net Ecological Gain" over No Net Loss" if we are to further salmon recovery: Habitat loss and water quality degradation resulting from poorly regulated development has been documented to be a leading cause of the decline of the salmon populations the orcas rely on. This action has long been called for by Tribes, salmon recovery groups and a wide range of environmental partners. You can recommend this policy and permitting change!</p> <p>Recommend phasing out the use of marine plastics polluting our waters and threatening sea life. Aquaculture should be able to substitute biodegradable materials for netting and tubes....hemp, bamboo, wooden tubes, stainless steel etc. I have attached pictures of the unsightly and dangerous plastic materials used in geoduck operations.</p> <p>Insert language to restrict the use of hydraulic harvesting....how is it homeowners are required to have an hydraulic permit to work on stairs or bulkheads, but the aquaculture industry is allowed to "blow up" sensitive near shore environments?</p> <p>Thank you for your service.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1321	17-Sep-19	Anonymous	Email	AF_General_Regulations_400	100 Existing Development	Support	<p>I think the proposed guidelines are great. As a home owner I have always wanted to put money into structural items, like framing, good electrical and plumbing and the existing guidelines limit you on those because on the dollar amount limit. And if the former owner neglected those areas you can now bring it up to today standards. The former 50 percent rule really prevents doing the necessary upgrades. And may prevent people from making the houses able to last longer because that 50 percent limit makes you have to chose where that money goes, electrical or framing. Not both. And the value of the house is based on the past condition of the house but is being put onto today's cost, so older houses in bad condition can never "catch up". Those houses probably need the most done to them to make them safe.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>Things have changed since 1971 when the Shoreline Management Act was written. What existed in the way of shellfish aquaculture in 1971 is a far cry from what exists today...</p> <p>...the County is willing to permit literally acres of PVC tubes on Thurston County tidelands, acres of netting and clam bags, raking of the tidelands, removal of native species and water jet harvest of geoduck. As in North Puget Sound, will we also find tractors on our tidelands? This is not in alignment with the goals to protect salmon and orcas. It is a complete contradiction.</p> <p>It would appear that county personnel are so afraid of the shellfish industry that they can't ever say "no" to the industry and they are doing their best to comply with the industry demand to reduce monitoring and regulation...</p> <p>...Many of the claims of the shellfish industry are tall tales, for example the claim that the geoduck tubes are hardly ever visible. That is bunk, pure and simple... We would ask the Planning Commission to read our letter to the County listing the permit violations of the ChangMook Sohn geoduck operation as the violations are undoubtedly not unique to this operation. We ask the Planning Commission to give guidance to the County Planners to deal appropriately with the permit violations and if operators reguse to remedy their permit violations, their permits must be terminated.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>We would ask the planning commissioners to review the history of citizen and local organization efforts to bring reason to the shellfish industry's attempt to take over Puget Sound tidelands. It is especially concerning that the primary areas that the industry covets are the estuaries--some of the most fragile areas of the shoreline.</p> <p>https://protectourshoreline.news.blogspot.com/</p> <p>http://coalitiontoprotectpugetsondhabitat.org</p> <p>http://caseinlet.org</p> <p>http://protectzanglecove.org</p> <p>http://apheti.org</p> <p>https://www.centerforfoodsafety.org/issues/312/aquaculture</p> <p>We request that the County put all applications for renewal of shellfish aquaculture operations and new shellfish aquaculture operations on hold and work with citizen and environmental groups to formulate appropriate regulations for the shellfish industry that take into consideration the goals</p> <p>With 85% of Totten Inlet tidelands filled with shellfish aquaculture on all levels of the beach, we would ask County officials and planners to look at what is currently happening in Burley Lagoon and Rocky Bay in Pierce County. We've attached two articles about the die-off of clams in these waterways and the consequent persistence of the bacteria and long-term horrific stench. The shellfish industry can attribute this to a toxic algae bloom, but everybody knows that illness occurs most easily in a system out of balance. Here is the link to the online source:</p> <p>https://protectourshoreline.news.blogspot.com</p> <p>Articles:</p> <p>9/16/19: Taylor Shellfish Says Clam Die-off in Burley Lagoon from Toxic Algae</p> <p>9/15/19: Burley Lagoon Residents Complain of Putrid Smell, Clams Die Off: A "Preferred Use" of the tidelands? to protect native species, salmon and orcas. Use of plastics in Puget Sound by the shellfish industry should be phased out.</p> <p>We request that the County put all applications for renewal of shellfish aquaculture operations and new shellfish aquaculture operations on hold and work with citizen and environmental groups to formulate appropriate regulations for the shellfish industry that take into consideration the goals to protect native species, salmon and orcas. Use of plastics in Puget Sound by the shellfish industry should be phased out.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	KT: The shellfish industry and has been given too many allowances. Geoduck aquaculture ••in all designations" needs to be removed. Shell fish aquaculture should not be allowed in Natural areas. It is clear that this draft would significantly allow for more gco<luck operations by the industry. KT: The wording of this section puts the onus on the landowners to prove "substantial interference with nonnal public use ofthc surface waters.'" This means individual homeowners going up against the shellfish industry and their significant lawyers and lobbyists. This wording fails to protect individual homeowners.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	KT: The shellfish industry and has been given too many allowances. Geoduck aquaculture ••in all designations" needs to be removed. Shell fish aquaculture should not be allowed in Natural areas. It is clear that this draft would significantly allow for more gcoduck operations by the industry. KT: The wording of this section puts the onus on the landowners to prove "substantial interference with nonnal public use ofthc surface waters.'" This means individual homeowners going up against the shellfish industry and their significant lawyers and lobbyists. This wording fails to protect individual homeowners. KT: Gcoduck aquaculture, using 7 miles/ 16 tons of PVC plastics along with netting PER ACRE of tideland, has been gi\`en extraordinaiy license to change the habitat or Puget Sound. It is actually a tiny industry that makes most of its money on the overseas market, selling to a population who bcliC\`CS that consuming gcoducks will enhance their virility. Massive alternation of the tidelands of Puget Sound for this craven money making purpose. What docs the County actually receive in recompense for giving away the tidelands of Puget Sound to the shclllish industry. Does anyone in rnwrston County actually want to save the salmon and the orcas'1 Gcoduck a uaculture --in all desiOnations" needs to be removed.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 A 3 c. KT: What is the rationale for creating a separate set of regulations for geoduck? PT: After expending substantial taxpayer resources requiring and defending the need for an SSDP why is the new SMP pro osing CUPs? What arc the differences between the two? PT: Existing non-geoduck aquaculture is substantially difircnt that gcoduck aquaculture. The preparation, planting, structures, and harvest are very different from oyster operations, as one example. There should be no shortcut via an ""administrative CUP" for switching from one to the other. PT: Thurston County has already detennined, and defended in court. that an SDP is required for geoduck operations because of the presence of structures. The court's decision had nothing to do with public use of the waters. This section (b) should be deleted.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 A 4. KT: 'Certain aquaculture developments" needs to be defined clearly. Unless clearly defined, this item should be deleted. That such activities must comply with all state and federal requirements is an oxymoron. This is, of course, always the case. KT: If there is "seeding", then the activity has nothing to do with "wild stock." "Seeding" means "planting". means a uaculrure farming. Thus wherever "seeding" occurs. that must be designated aquaculture.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 B. KT: What is the specific process for demonstrating and/or detennining why requested infonnation is not applicable to a specific proposal and thus why the infonuation does not apply? Is there a specific form and if so, where is it located? WHO makes the detennination about whether requested information is applicable to a specific proposal and is there a process for citizen/community input on the specific claim? Arc neighboring citizens/community members notified that requested infonuation has been waived and is there a process for anyone to object to this apparently arbitrary decision by an unknown pai1y? I agree with PT comment below: the last sentence in the above Paragraph should be stricken.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 B 1. PT: The last sentence under (B) should be deleted. The site plan should always include information for (a) through (f). KT: The term "structures" and "other modifications" should be either be defined or stricken as meaningless terms ..	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 B 2. PT: Items (c), (d) and ("c) should not be stricken. Prevailing wind storm conditions, current flows al tidal cycles, and flushing rates arc relevant to potential impacts on tideland ecosystems, including the impact of siltation by aquaculture operations, and vary from one site to another. These must remain in the specification. KT: The re-wording in the 2nd sentence "... should be included if already part of infonnation submitted for another federal of state agency." should be stricken. 1.The word "should" (rather than "shall") gives complete leeway to the applicant to provide the information or not based on their own interests (IF it was "submitted to another federal or state agency.") 2. The logic of the sentence implies that if the infonnation is not already on a state or federal fonn, it is not required and the "should" implies logically that even if it is on a state or federal form, it is not required. 3. Providing this infonnation must be a requirement for ALL applications without dithering around trying to put in language that excuses the applicant from suQ_plying relevant infonnation about the site. 4. The second sentence of this section is both garbled and inaccurate.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.115 B 3. PT: These items should not be excluded if already provided as a part of a submission to another federal or state agency. The intent of Thurston County SMP regulations docs not duplicate all of the other state and federal regulations, and the specified information is relevant. If the infonnation has been submitted as a part of other regulations, it would not be unreasonably difficult to provide it to Thurston County. KT: Once again@this is a highly confusing addition. It appears 10 imply that "an operational plan" may or may not be (should) included if it was included on a federal or state submission. logically implying that it is not required to be included at all. This is garbled at best. Simply say that the following items MUST be included (a-1). The County does not need to run interference with the state and federal requirements. Somebody is obviously trying to say something in a very backward (hidden?) way.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.115 B 4. PT: The redline addition should be deleted. All of the subject reportsS (a) through (h) are relevant to local SMP regulations and should be provided. KT: I agree with PT. Strike the red-line wording. All that wording does is create confusion and questions about who will make the decision about whether these items arc required or not, i.e, who is in charge of the "pennit review". There should be a standard set of requirements for all pennit applications without having someone in the department able to pick and choose what is required from an individual applicant.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 a. PT: "Shall be a prclcrred use": has no basis in WA state law or regulations. The recent Growth Management Hearings Board rulin° confinns this. Change this to "is one preferred us among others". KT: I agree with PT.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 b. PT: This section probably has no basis in any Washington state law.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 c. PT: This section probably has no basis in any Washington state law. It is also so vaguely defined as to be unenforcable. KT: Also it is more than bizarre that Thurston County would want to enshrine in this document the onc-wav street that upland development may impact aquaculture operations. What about the lact that aquaculture operations have high impact on entire neighborhoods of shoreline property owners" Do you actually think that 7 miles of PVC wcighin!! 16 tons per tideland acre. covered with plastic netting, docs NOT impact upland owners? Do you actually think that boats, barges, workers on what once were pristine tidelands. raking, dred!!in!! tractors, etc. do NOT impact upland property owners? We know that gcoduck harvest in!! causes extensive siltation. which will impact any eelgrass in the vicinity and impact water quality. KT: The shellfish industry claims that geoducks "clean the water." In other words, geoducks remove phytoplankton from the water, which is NOT "cleaning" the water. Shellfish and gcoducks filter and consume phytoplankton and detritus. Phytoplankton is an important aquatic plant and nutrient for a number of other aquatic species and is naturally present in the marine environment. Like all creatures, gcoducks "poop"--they produce feces and pscudofcccs and as the industry plants 3 seeds to the tube and one tube per square foot, that equates to 43,560 (if one seed per tube survives) to a maximum of 120.680 ucoducks in one acre. That's a lot of gcoduck poop. KT: Clams and oysters also poop. Sec excerpt below from: https://protectourshore1enews.blogspot.com/2019/09/burley la oon-residents complain-of.html It's not rocket science. It's "Ecosystem Services". KT: With the above two (new) standards (b and c). obviously written bv and for the shellfish industry, you are looking from the perspective of that tiny industry which doesn't provid!! much money to the County, rather than from the perspective ofoproprtv owners who arc probably your biggest source of income. Whv is the County so enamored of the shell lish industry"! What do you get fonn them? This is a specific question that deserves a specific answer.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 c. PT: Due to the extreme risk to endangered and threatened species, such as Southern Resident Killer Wales and salmon, this item should be stricken. There is no current justification for automatic extension of pcnnits. No business should be excmP.t from periodic review o@ permit requirements. PT: This statement ignores the requirement under the general No Net Loss policy for monitoring and adjustment based on results. Research has shown that the large majority of mitigated projects fail to meet No Net Loss requirements. This item should be changed to "Aquaculture shall not be permitted in areas where it would result in a net loss of shoreline ecological functions, or where adverse impacts to critical saltwater and freshwater habitats cannot be monitored and reviewed on a periodic basis based on scientific best practices. In such circumstances the Qrinciples of the precautionary principle shall be applied." KT: Please remind yourselves that county planners have explicitly stated that the County does not have the money or the personnel to monitor these aquaculture operations, that they rely on citizens to monitor for County. Given this fact, it is questionable whether pennits should be given at all.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Us e_and_Modificat ion_Developmen t_Standards_600	115 Aquaculture	Change Requested	19.600.114 C 1 e. PT: This is an unnecessary specification. It should be deleted.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.114 C 1 f. PT: This is an unnecessary specification at this section. Recommend that this item be deleted.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 g. KT: The County should provide notice and time for comment from neighboring landowners and environmental organizations. Who docs the County '•circulate the monitoring and adaptive management plan to?" It should be specifically stated that the immediate community received written notice and copies of the monitoring and adaptive management plan. KT: Unless the County will commit to actual monitoring on a regular basis, "g" should be stricken. County personnel have stated to us that they do not have the personnel or the money to do any monitoring of aquaculture operations and that they rely on community members to do it for them.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 h. PT: Suggest changing the first sentence to: "Over-water structures and/or equipment, including barges and similar vessels " KT: Last sentence is confusing. It implies that materials that ARE necessary for immediate and regular operation of the facility can be stored waterward of the OHWM. This means that half the time, (and most of daylight hours in the summer), these storage items will be on the beach. Please explain to us what you envision here and how you will monitor these equipment/over-water structures. One of the operators on Dana Passage, has a barge well over 6 feet that he leaves in view of the entire neighborhood of Zangle Cove most of the time. When we complained related to the 3 day limit for such barges, he move his barge every 3 days from one side of the Cove to the other. And this is an operation that, last we checked with the County, doesn't even have a County pennit, a fact we have complained about in writing in the past. So any items such as "Item H" appear to be nothing more than nice sounding words, meaning nothing.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.114 C 1 i. PT: Remove "where feasible" from "with the owners' identifying marks where feasible ... ". It is not clear when this is not feasible, and has been a requirement for a number of years.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 k. KT: What is a "(proper receptable?") Please give example.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 l. PT: Suggest modifying: ··· aquaculture structures. including barges and other marine vehicles, structures and facilities ··	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	19.600.115 C 1 n. PT: Please describe how this will be monitored. Recent projects have already failed in this regard. If this cannot be monitored there should not be any permitting until it can .. PT: Please describe what this means. Currently this is not possible. PT: Nuisance regulations arc ineffectve in relation to o crations that arc routinely permitted. KT: What outside agency will monitor this? The County has already stated that it docs not have the money or the personnel to monitor aquaculture installations. PT: This is meaningless unless there is a definition of'•protectivc functions•• and their intended need. PT: "Predator exclusion" is an industry tcnn. It has no place in a regulatory definition. Predators··. in this case are native, naturally occurring wildlife species. This should be deleted, or changed to refer to native wildlife. KT: I agree with PT. The term "predator exclusion" is a negatively biased tenn tha rcllects only the point of view of the proponents of commercial aquaculture. It is inaccurate from any other point of view. To be accurate this section should read; Wildlife exclusion methods shall not be designed to intentionally kill or injure wildlife. Wildlife exclusion methods shall comply with federal and state regulations as determined by applicable federal and state agencies. PT: Rotational planting may aggravate environmental impacts due to increase occurrence of siltation, etc. Please provide the scientific rational for the statement that rotational planting and harvesting may minimize aesthetic and habitat	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>19.600.115 C 2 a.</p> <p>PT: This conflicts with current requirements related to tribal rights. A gcoduck aquaculture operation must allow tribes to harvest (clear) appropriate amounts of native geoducks.</p> <p>KT: We recommend excluding estuaries as appropriate for commercial gcoduck aquaculture or any kind of aquaculture. Estuaries arc the most sensitive of tidelands and should be preserved in their natural state. So many have already been used for aquaculture, there may not be many left. For example, 85% of Totten Inlet is in tideland aquaculture.</p> <p>b.</p> <p>PT: What is the point of this statement"! This appears to be an attempt to prohibit future constraints on geoduck operations. It should be deleted.</p> <p>c.</p> <p>PT: This WAC is specific to revisions to permits where environmental conditions do not change. Aquaculture operations occur in highly changeable environments. It should be obvious that ermils should be renewed at the end of predictable planting/harvest cycles.</p> <p>KT: Acluaculture, especially geoduck aquaculture using 7 mile/16 tons of PVC plastic per acre, along with tons of plastic netting, as well as clam culture using plastic net clam bags, arc high intensity operations. Because there is no monitoring by the County (as stated to us by County employees), there must be requirements for re-submission of applications after the planting/harvest cycle, which is 5-7 years. This is not unreasonable, as conditions can dramatically change, especially in our era of global warming. It is not reasonable to just write a --blank check for the tidelands" to the industrial shellfish industry, when we, as a culture. arc attempting to understand the issues with depiction of salmon and the winding pods of Orcas.</p> <p>KT: It is also unclear why the County is not requiring an SDP for industrial aquaculture after the rulings by Judge Bjorgen and Judge Tabor related to gcoduck PVC pipes as "structures." Is this just an example of the County caving in to the industry's attempt to minimize the impacts of their operations? Please explain the difference between the SDP and the CUP in tcnns of regulation and monitoring required under each along with community participation in the process under each.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>19.600.115 C 2 d.</p> <p>PT: Multiple sites within an environmentally significate inlet, bay or other marine environment, may be significantly different. This item should be deleted.</p> <p>e.</p> <p>PT: No night or weekend activity should be allowed within 2,000 feet of a residential area. The term "greatest extent racticable" has no meaning.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>19.600.115 C 3.</p> <p>PT: Net pen operations have provably demonstrated their environmental damage to Puget Sound. This entire section should be deleted.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	130 Commercial Development	Change Requested	<p>19.600.130 B 2.</p> <p>PT: What is the basis for this order of preference'? And what is the basis for the requirement to demonstrate that a more preferred use is not feasible? Is it even possible to demonstrate this?</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	130 Commercial Development	Change Requested	<p>19.600.130 B 3.</p> <p>KT: How do you define --significant impact?" Readers deserve to know if what county officials have in their minds at this moment in history as a definition is adequate or inadequate. Please read description of changes in shell fish aquaculture at the beginning of the Aquaculture section, from the persr.ective of one of the original drafters of the Shoreline Management Act of 1971.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	130 Commercial Development	Change Requested	<p>19.600.130 B 5.</p> <p>PT: Such mitigations must be site-specific.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1322	2-Oct-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	General Feedback / No Specific Section	Change Requested	<p>Attached documents:</p> <p>1st: E-mail from Townsends to Thurston County Planning Department, included survey by Hatton Pantier of the CHangMook Sohn geoduck operation on Zangle Cove with reference to the beach height of the operation. The operation is alleged to be well above the allowed +3 beach height permitted to ChangMook Sohn.</p> <p>2nd: Protect Our SHoreline News article: "Burley Lagooodn Residents Complain of Putried Smell, Clams Die Off: 'A Preferred Use' of the tidelands?"... Article looking at the public interest and industrial scale aquaculture.</p> <p>3rd: Case Inlet SHoreline Association - FAQ on Industrial Shellfish Aquaculture in Puget Sound</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1323	2-Oct-19	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	<p>Requests SMP Review include language phasing out aquaculture plastic PVC pipes and netting in favor of biodegradable materials such as hemp or bamboo.</p>	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1324	5-Oct-19	Dee W. Hock	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Change "farm, agriculture, or aquaculture" to "biological manufacturing". Concern that Geoduck invludves plastic pipes and netting into ecosystem. Requests ordinance to prohibit Geoduck aquaculture.	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders. Presented to Planning Commission at 10/2/2019 PC Meeting. Scanned and added to the record.	Pending / Item for Discussion
1325	4-Dec-19	Townsend	Planning Commission Meeting	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Other	Attached are the rulings by Judge Thomas Bjorgen and Judge Gary Tabor related to the AG Opinion that you posted on the SMP website. We suggest that it would be honest and principled to include these rulings in your list of important documents for tonight's meeting. Ironically, Thurston County prosecuting attorney, Jeff Fancher, argued these cases and won against the shellfish industry. Now the County appears to support the shellfish industry. Please explain. Please add the following Power Point to citizen concerns related to shellfish aquaculture. https://protectourshoreline.org/slideshow/POS_ShellfishAquacultureConcerns.pdf From legal brief: "The Department's summary judgment motion that the proposed geoduck operations are a "development" under the SMA because they involve "construction of a structure" is granted. The Appellants' summary judgment motion on the same issue is denied."	Forwarded to Planning Commission. Pending item for discussion with staff, planning commission, and stakeholders.	Pending / Item for Discussion
1326	12-Feb-20	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Opposed to specific shellfish permits and expansion of industrial aquaculture on Puget Sound. Protecting shorelines should be a priority. Some entities have recommended "net gain" standard vs. "no net loss." How do applicants guarantee no net loss? How could they provide net gain? Use of plastics should be prohibited; plastic pollution is jeopardizing marine environment.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1327	17-Apr-20	John Woodford	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	150 Industrial Development	Change Requested	Industrial use are not appropriate for residential shorelines. Some standards for mooring structures do not apply to all types of shorelines. Questions about "straight line" requirement for docks.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1328	6-May-20	Phyllis Farrell	Email	AA_General_Fee dback		Change Requested	Concern about use of plastics in aquaculture operations and lack of monitoring ability by the County. Questions whether proposed buffers are adequate to address flood risks and climate change. Has questions about how no net loss and cumulative impacts are measured. Greater flexibility for individual docks, and wider docks, is contrary to state provisions on reducing shoreline modifications. Agree with PC comments that standards should be differentiated between lake, marine, and stream shorelines.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1329	3-Jun-20	Bob Jensen	Email	AA_General_Fee dback		Other	Commenter is concerned about toxic algae blooms in lakes. Advocates for monitoring and maintenance of existing septic systems, and moratorium on new residential development on lakes. Views SMP as primary tool to address algae blooms in lakes.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1330	1-Jul-20	Annabel Kirschner	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600		Policy Question	Planning Commission must preserve natural environment from runaway development. Confine growth to the urban growth area. County must protect shorelines. Regulate fishing and shellfishing strongly. Restrict development along shorelines; regulations need to be more strict.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1331	1-Jul-20	Phyllis Farrell	Email	AA_General_Fee dback		Change Requested	Planning Commission comments are reflected in draft. Include comments from the public as well. Consider previous comments made by Anne Van Sweringen and Futurewise. How is the County addressing 'no net loss'? Consider a 'net gain' standard. Heed federal ruling on Army Corps' Nationwide 48 permit for aquaculture; look closer at aquaculture processes. Ensure 'no net loss' from aquaculture practices. Maintain/increase marine buffers, reduce shoreline armoring, and require more public access.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1332	9-Jul-20	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Commenter is providing comment on two pending geoduck aquaculture permits. Industrial aquaculture is harming shorelines. Deny aquaculture permits until more protective guidelines are available which guarantee no net loss.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1333	15-Jul-20	Esther Kronenberg	Email	AA_General_Fee dback			County must safeguard water resources in light of water quality issues, sea level rise, and development pressure. Adopt net gain standard. Maintain current marine buffers, increase them for new developments. Phase out aquaculture plastics to prevent further degradation of water quality, and protect sealife from microplastic pollution. Prohibit destructive industry practices, such as the use of heavy equipment on fragile beaches and the spraying of herbicides and pesticides. Limit armoring of docks and bulkheads. Require community rather than individual docks, especially important for the survival of our threatened orca population.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1334	15-Jul-20	Paula Lowe	Email	AA_General_Fee dback		Change Requested	Staff should locate all past comments provided on the SMP; they represent time and energy put in by the community. Comments provided at Planning Commission meetings need to be included in the draft.	Staff are looking back through county files and past Planning Commission meetings to compile all public comment. The Planning Commission and BOCC direct staff as to which public comment to include into the draft.	Pending / Item for Discussion
1335	8-Apr-20	Mark Anderson	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	19.400.120 Section C2: Alternatives for Existing Development Move this section out of Section C (Constrained Lot and Infill Provisions) and make it its own section to allow existing non conforming structures within the buffer to expand landward. Example is an existing house with no garage on a non-constrained lot which will be remodeled and wants to add a garage.	The draft currently allows upland expansion of nonconforming structures (up to 500 SF allowance within the standard buffer), with mitigation.	No Action Required

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status
1336	3-May-20	John Woodford	Email	AC_Definitions_150		Policy Question	Why isn't water oriented industrial use covered in Definitions chapter?	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1336	3-May-20	John Woodford	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	150 Industrial Development	Policy Question	Give examples of water oriented industrial uses that might be allowed in a Shoreline Residential SED. Provide an example where industrial development zoning occurs within Shoreline Residential SED.	Staff will research industrial uses that may be permitted in the Shoreline Residential SED.	Pending / Item for Discussion
1337	5-Aug-20	Patrick and Kathryn Townsend	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Other	Email provides three documents related to the 6/11/2020 federal ruling on the Army Corps of Engineers' Nationwide 48 permit, including the order vacating NWP 48 in Washington state, a follow-up order, and a press release from the Center for Food Safety.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1338	1-Sep-20	Barry Halverson	Email	AJ_Appendix_A_Shoreline_Environment_Designations_Map		Change Requested	Commenter has questions and seeks clarification about the designation of 3 reaches on Lake Lawrence: LLA 5-6, LLA 6-1, and LLA 1-2.	The Planning Commission reviewed these SEDs and voted to revise the designations. Revisions will be reflected in an appendix to the SED report document on the SMP website prior to public hearing.	Pending / Item for Discussion
1339	1-Sep-20	John Woodford	Email	AF_General_Regulations_400	100 Existing Development	Change Requested	Attached letter requests use of the term "conforming" when referring to legally existing structures constructed prior to the adoption of this SMP.	Comment will be forwarded to Planning Commission and BOCC. This item has been highlighted in the Planning Commission draft as a matter the Planning Commission wishes to have public input on during the public hearing process.	Pending / Item for Discussion
1340	1-Sep-20	John Woodford	Email	AA_General_Feedback		Change Requested	Comment letter touches on and requests changes on a variety of subjects, including how legally existing structures are referenced in draft and allowances for those, what is exempt from a SDP, development standards for docks. The letter includes a number of policy items, such as concurrent development of public education materials, differentiating rules for different shoreline environments, and highlighting the need for due process for shorelines where environment designations are proposed to change.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1341	2-Sep-20	Don Kelly	Email	AA_General_Feedback			Commenter expressed concern about increasing regulations. They do not seem to help the lake and people appear to actively avoid compliance. Is concerned with communication with property owners about SMP update.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1342	2-Sep-20	Don Kelly	Email	AA_General_Feedback			Themes are similar to those expressed in Comment #1341 above.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1343	20-Oct-20	Phyllis Farrell	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	SMP should strive for "net gain" standard vs. "no net loss." Concerned about conversion of shoreline to aquaculture uses. Aquaculture should be limited, vs. encouraged. Advocates for environmentally responsible practices for industry.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1344	26-Oct-20	Heather Burgess	Email	AJ_Appendix_A_Shoreline_Environment_Designations_Map		Change Requested	Letter and supporting materials from environmental consultant request that reaches LOF 5-1 and LOF 1-2 be designated Rural Conservancy, vs. the proposed Natural designation. Materials include commenters' rationale for why this designation is more appropriate.	The Planning Commission reviewed these SEDs and voted to revise the designations. Revisions will be reflected in an appendix to the SED report document on the SMP website prior to public hearing.	Pending / Item for Discussion
1345	2-Nov-20	Barry Halverson	Email	AA_General_Feedback		Change Requested	Question about why buffers would be increased in the draft. Dollar amounts for docks exempted from SDP requirement should be higher. Six feet should be the norm for docks. Lake Lawrence is not a salmon bearing lake; requirements for salmon-bearing water bodies should not apply. Reiterating questions about Lake Lawrence SEDs.	Comment will be forwarded to Planning Commission and BOCC. Thresholds for exempting development from SDPs are set by state law and cannot be changed by Thurston County.	Pending / Item for Discussion
1346	18-Apr-20	No Name	Email	AF_General_Regulations_400	135 View Blockage	Change Requested	Promotes change that would enable heavily forested lots to have reduced buffer if adjacent views would not be impacted.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1347	18-Apr-20	No Name	Email	AF_General_Regulations_400	120 Vegetation Conservation Buffers	Change Requested	19.400.120(B)(4) needs clarification that setback is not required once construction is completed.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1348	16-Nov-20	Bob Jensen	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	170 Residential Development	Change Requested	Commenter proposes amendments to this section, in response to algal blooms on county lakes.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1349	17-Nov-20	Diani Taylor	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Change Requested	Consider defining "abandoned" and "fallow" in the SMP.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1350	17-Nov-20	John Woodford	Email	AA_General_Feedback		Change Requested	Various comments on Chapters 19.100-19.400 of the draft SMP. Covers multiple topics.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1351	25-Nov-20	Diani Taylor	Email	AH_Shoreline_Use_and_Modification_Development_Standards_600	115 Aquaculture	Policy Question	Restrictions on plastic usage should not be limited to aquaculture uses only. The SMP includes many protections for native species and does not have a 'no impact' standard. Aquaculture uses have been upheld in case law. Thurston County conducts code enforcement through Title 26 TCC. Comment letter includes attachments.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion
1352	30-Nov-20	John Woodford	Email	AF_General_Regulations_400		Change Requested	Commenter expressed concern about notification of property owners whose shoreline environment designations are changing. The postcard notification itself needs additional work. Letter includes additional comments about draft Chapter 19.400.	Comment will be forwarded to Planning Commission and BOCC.	Pending / Item for Discussion

[illegible]

[illegible]

Comment #	Date of Comment	Name	Source	Chapter	Section	Type of Comment	Comment Summary	County Response	Status