

Chapter 19.600 Shoreline Use and Modification Development Standards

19.600.102 General Shoreline Modification Principles

4. Assure that shoreline modifications individually and cumulatively do not result in a net loss of ecological functions. This is to be achieved by giving preference to those types of shoreline modifications that have a lesser impact on ecological functions and requiring mitigation of identified impacts resulting from shoreline modifications. HOW IS THE DRAFT PLAN ASSURING THAT MODIFICATIONS DO NOT RESULT IN NET LOSS OF ECOLOGICAL FUNCTIONS??? WHAT ARE THE METRICS USED? HOW ARE PROJECTS MONITORED? WHAT IS THE ENFORCEMENT STRATEGY IF A PROJECT DOES RESULT IN NET LOSS??

6. Plan for the enhancement of impaired ecological functions where feasible and appropriate while accommodating permitted uses. As shoreline modifications occur, incorporate all feasible measures to protect ecological shoreline functions and ecosystem-wide processes. GIVEN THE DECLINE IN SHORELINE FUNCTIONS, THERE SHOULD BE NO ACCOMMODATING PERMITS ISSUED IF THEY WILL IMPAIR ECOLOGICAL FUNCTION. If a project will impair, it should be denied!

In Section 19.600.160 Mooring Structures and Activities The Puget Sound Partnership and the Orca Task Force recommend reducing shoreline armoring by 25% in order to protect and restore shoreline habitat. In order to reduce armoring to enhance ecological function, I am opposed to the draft recommendation to consider eliminating the requirement to consider alternative mooring prior to allowing piers and docks, or allowing docks in the natural environment, especially marine environments.

The draft should maintain or improve shoreline buffers, reduce armoring and phase out the use of plastics in aquaculture operations. Require reports from aquaculture operations and other shoreline projects with metrics of no net loss.

Does the Plan account for Climate Change and Sea Level rise projections? Current proposed legislation will require this, but it only makes sense to address it now.