

From: [Phyllis Farrell](#)
To: [Andrew Deffobis](#)
Cc: [Jennifer Davis](#)
Subject: SMP indicators and monitoring
Date: Wednesday, July 21, 2021 7:42:05 PM

Greetings Andrew,

You mentioned at the Planning Commission meeting tonight that there is a baseline of indicators from the old SMP....is there a report comparing the metrics to recent times? Can that report be made available for Planning Commission discussion? Does the draft SMP address areas of documented loss?

From what I have read the SMP provides rules, regulations, permitting, zoning etc. designed to guarantee NNL, but what happens if they aren't working?

You also mentioned there were provisions in the draft for monitoring permits....can you describe the monitoring that has been done? I would be curious to know about the monitoring that has been done for aquaculture permits? Will the new draft SMP increase the monitoring? What are enforcement provisions? Is there a need for increased funding for staffing to adequately monitor permits and shoreline ecological function?

I am alarmed that the draft SMP will not be evaluated for NNL for 8 years; that's a long time to reverse any harms done.

Thanks,

Phyllis

Sent from [Outlook](#)

From: [Phyllis Farrell](#)
To: [Andrew Deffobis](#)
Cc: [Jennifer Davis](#)
Subject: SMP comments for 8.4.21 PC mtg
Date: Monday, August 2, 2021 7:30:58 PM
Attachments: [SMP comments 8.4.21.docx](#)

Greetings Andrew, hope you are well.

I am unable to attend the 8.4.21 Planning Commission meeting, but have attached comments I am requesting you forward to the Planning Commission for consideration at the meeting.

I am curious to know if we have data of the amount (# of miles) of armoring of the 468 miles of Thurston Co. shorelines and how that has increased over the years.

I am also interested to know if you have data on the number of variances and the number of exemptions. Do you know how many appeals and any dispositions?

I know you are busy, but would appreciate hearing back from you when you have that information.

Thanks you for all you do!

Respectfully,

Phyllis

Sent from [Outlook](#)

SMP comments 8.4.21 Thurston County Planning Commission

Phyllis Farrell, 7600 Redstart Dr. SE, Olympia, WA 98513

Greetings Commissioners, I have a conflict the evening of August 4th, so I am submitting written comments regarding the draft SMP for your consideration.

As the SMP update process is nearing completion, I would like to emphasize the importance of the wording you recommend as this document will be in effect for many years and be the guiding document regarding the use of and protection of our shorelines. Your questions and recommendations have been reflected in the draft language, but much of the public comment and recommendations have not made it into the draft language. You can ask those be included in the draft plan.

I would like to refer you to two documents submitted by Anne Van Sweringen, representing 5 local environmental groups...the 30 pages of draft language suggestions dated July 15th, 2018 and 16 pages dated September 10, 2018. Anne is a retired environmental planner and the documents contain best available science recommendations.

Also, the Futurewise letter of March 6, 2019 has specific recommendations for areas in the draft SMP that do not meet the requirements of the SMA. Please request those recommendations be included in the draft language.

It is obvious to most citizens that shoreline development has resulted in a decline in ecological function since the 1990's...water quality, shoreline erosion, increase in armoring, loss of shoreline vegetation buffers and tree canopy, loss of biodiversity, declines in forage fish, salmon and orca populations etc. Permitting and zoning requirements are designed to achieve NNL, but are they working? Since the last SMP what metrics have been identified, and how are those losses addressed in the draft SMP?

There have been references to monitoring and enforcement of shoreline permits. P. 88 of the draft refers to a report on 6 criteria.. It requires a report and if there is NNL, what are the changes in the draft SMP to prevent further degradation?

As I have commented before, I advocate the following measures be included in the draft SMP:

- Shoreline buffers, especially marine, should be maintained or increased. I am astounded on p. 56 of the draft that all marine buffers are reduced! How is this rationalized given buffers are essential for shoreline ecological function and to provide for sea level rise? This is incompatible with the No Net Loss requirement. Please refer to the Futurewise letter to the County with SMP recommendations dated March 6, 2019.
- 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. With salmon and orca recovery a statewide priority, I suggest increased efforts in near shore restoration. According to Thurston Co.'s SMP Fact sheet #5, Counties cannot outright prohibit aquaculture or geoduck production, but **under a local Shoreline Master Program may regulate where and how aquaculture operations occur.**

- Climate Change: Sea level rise associated with climate change may result in encroachment and erosion...spurring 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 reduce armoring by 25%. Strengthen armoring regulations and require “soft” armoring to ensure No Net Loss.

Please be responsive to the environmental public comments you have received and recommend they are reflected in the draft language that you approve.

Thank you for your service,

Respectfully,

Phyllis Farrell

From: [Diani Taylor](#)
To: [Andrew Deffobis](#)
Cc: [Erin Ewald](#)
Subject: SMP comment re: mussel raft standards
Date: Wednesday, August 4, 2021 3:30:12 PM
Attachments: [image001.png](#)
[I. Taylor Comment Thurston SMP. 080421.pdf](#)

Hi Andy,

Please see the attached comment letter.

Thank you!

Diani

Diani Taylor E.
General Counsel



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Thurston County Community Planning
Andrew Deffobis, Associate Planner
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Via Email: Andrew.Deffobis@co.thurston.wa.us

August 4, 2021

RE: Thurston Shoreline Master Program Mussel Raft Standards

Dear Mr. Deffobis:

I appreciate the hard work that you and the Thurston County Planning Commission have dedicated to the County's Shoreline Master Program ("SMP") update. I am general counsel for Taylor Shellfish Farms ("Taylor Shellfish") and am submitting these comments to address additional mussel raft standards being considered by the Planning Commission. The standards, provided in your July 14 memorandum, come from a permit issued to Taylor Shellfish for a mussel farm in the County.

The Planning Commission and County staff have spent considerable time and energy to comprehensively review aquaculture and have carefully considered appropriate standards over several years. This effort has led to robust policies and regulations addressing the use, in its many forms, in the County. Taylor Shellfish supports the current Draft SMP language.

Additional standards addressing mussel raft culture are unnecessary. The currently proposed standards in Section 19.600.115 (Aquaculture) apply to and address all types of shellfish farming, including mussel raft culture. The following standards in 19.600.115(C) (General), already cover the matters addressed by the standards from the July 14 memorandum and do so for all aquaculture types, not just mussel rafts. Current proposed SMP standards include the following, among others: (g) regarding impacts to shoreline ecological function; (h) regarding navigational conflicts; (i) regarding Shorelines of Statewide Significance; (j) regarding siting and design; (l) addressing overwater structure design, maintenance, and gear storage; (m) regarding maintenance and marking of structures and equipment below the OHWM; (n) regarding overwater processing; (o) regarding waste and debris; (p) regarding marking floating and submerged aquaculture structure; (r) addressing predator exclusion devices; (s) regarding use of project phasing to address aesthetic and habitat impacts; and (t) regarding Department of Natural Resources and aquatic leases.

The standards in the July 14 memorandum specific to mussel raft culture come directly from and are best considered as permit conditions and applied as appropriate. In implementing the general standards, above, County staff are in the best position to determine whether and how to apply these specific standards, variations, and others to mussel raft proposals based on site- and project- specific information. The additional mussel raft standards being considered may be appropriate for some but not all projects, and that should be determined on a farm-specific basis and not prescribed by the SMP.

Finally, we are unaware of local conditions or other features that have not already been addressed by the SMP or any scientific or technical information, per WAC 173-26-201(2)(a), that demonstrates these additional standards are warranted for all mussel raft culture. Rather, it seems consideration of these mussel raft standards may have been prompted by a miscommunication between the Department of Ecology (“Ecology”) and the County. To be clear, Section 19.600.115(C)(3) (Additional Standards for Net Pens) applies exclusively to finfish aquaculture, not shellfish. Per the July 14 memorandum, Ecology referenced Section 19.600.115(C)(3), specifically, when it communicated with the County. Separating additional standards for finfish net pen culture is appropriate and consistent with Ecology’s SMP handbook Chapter 16¹ on Aquaculture (see pages 33-38) as well as the approach taken by all other county SMPs we are familiar with. The Section 19.600.115(C)(3) title starts, “Additional Standards for Net Pens. Fish net pens *and rafts* shall meet the following criteria: ...” (emphasis added). The “and rafts” language simply refers to a finfish culture method. The section has no application to shellfish raft culture.

Thank you for your time and consideration of these comments.

Sincerely,

Diani Taylor E.
General Counsel, Taylor Shellfish Farms

¹ <https://apps.ecology.wa.gov/publications/parts/1106010part16.pdf>

From: [Kim Bredensteiner](#)
To: [SMP](#)
Subject: Nisqually Land Trust request - Shoreline Master Program Update - Appendix C - Table C.5-3
Date: Friday, August 6, 2021 2:11:55 PM

Hi Andy,

Is there still time for the Nisqually Land Trust to be added to the list of organizations included in the Restoration Partners list in Appendix C – Table C.5-3 of the SMP?

Here's our draft language for the table:

Organization and Program: Nisqually Land Trust

Mission and Scope: A private, nonprofit organization that permanently protects, stewards, and restores shoreline, floodplain, and forest lands to benefit the water, fish, wildlife, and people of the Nisqually River Watershed, and the Nisqually Reach and surrounding marine nearshore areas.

Role in Future Restoration Efforts: Restoration and protection project sponsor and partner.

Examples of Projects: As of 2021, over 8,700 acres permanently protected, including 1,350 acres in Thurston County. Over 14 miles of Nisqually River shoreline permanently protected, including 9.5 miles in Thurston County. Riparian forest restoration projects in progress across 200 acres at six sites in Thurston County.

Thank you,

Kim



Kim Bredensteiner

Associate Director

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