

From: Doug Karman

Re: Comments on Chapter 19.500 General Regulations (SMP)

I need help with the permits. 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.

- **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?
- **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.
- **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. 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.

This paragraph focuses on Single Family. What about 2, 3 & 4+ unit housing? Does this need to be included here or elsewhere?

- **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.
- **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.

- **19.500.100.C.3.g:** Shouldn't this section include a disclaimer relative to the buffer/setback requirement?
- **19.500.100.C.3.h.i:** This should be eliminated. The permit fees would exceed \$2500 let alone the cost of a consultant and contractor.
- **Chapter 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.
- **19.500.100.D.2:** This paragraph is confusing. Please explain
- **19.500.105.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?

From: Don DeHan:

SMP, 19.400.120, B-4. Is there a difference between items a & b ?