

Greetings Commissioners, thank you for the opportunity to comment again on the draft SMP. I have spoken publicly many times (since 2017!) and submitted written comments; I am trying not to be discouraged, but I am still waiting and hoping that my comments and suggestions, based on science and best management practices, will be included in the draft SMP language.

As a reminder, the environmental advocates have asked:

- The draft should maintain or improve shoreline buffers,
- reduce armoring,
- regulate and limit the expansion of aquaculture. Phase out the use of plastics in aquaculture operations. Require reports from aquaculture operations and other shoreline projects with metrics of no net loss.
- address sea level rise projections when permitting and to maintain adequate marine buffers

The SMP requires No Net Loss of ecological function. Tribes and environmental groups are advocating for a standard of Net Gain since it is obvious that No Net Loss isn't working...as demonstrated by declines in water quality, shoreline ecological function, eelgrass beds, forage fish habitat and salmon and orca recovery. Consider adopting a standard of Net Gain in the SMP.

Previously I suggested some metrics to indicate gains/losses. Also, the Dept. of Ecology requires as part of the deliverables the following documents:

- a. Cumulative Impacts Analysis Report, addressing measures designed to offset cumulative impacts
- b. Restoration Plan, including timelines and benchmarks for implementation.

I have not seen the Report or Plan, but perhaps it will be included with the draft SMP?

I really appreciate the service of the Planning Commission members...you have a lot to read and consider, and hours in meetings. You are guided by staff, but also consider public comments. Please request or direct staff to reflect in the draft SMP the numerous public comments from individuals wanting protections for our shorelines, marine waters, and public access.

7-21-21 Testimony before Thurston County Planning Commission

My name is Anne Van Sweringen, I represent 5 Thurston environmental groups, who are concerned about converting shorelines to other uses. We would like to know,

What will the SMP state?

About Mitigation:

- Will mitigation be carefully designed to replace all ecological functions that are lost by development?
- Will mitigation be located in areas where it can actually function?
- Will mitigation be monitored and maintained until, for instance, plants or runoff reduction measures are fully established?

About Buffer Widths:

- When buffer widths are reduced in size, can the county prove that mitigation will result in no net loss of environmental functions?
- Will increased buffer widths be required when a site has conditions that require protecting a habitat's functions and values? For instance, To protect habitats or species identified in the county code, or when land has slopes or minimal vegetative cover? Will those buffers be increased?

About Aquaculture:

The overarching focus for aquaculture practices must be avoidance or minimization of negative impacts. Is the County establishing monitoring procedures to ensure aquaculture operations are in compliance with permit conditions?

No Net Loss is not being reflected in the draft language – Why is that?

What metrics are you going to require be used to measure ecological functions and processes to determine NNL?

Please refer to the comments I submitted – I don't see any of those comments being considered in the draft SMP.

Lastly, please remember, the SMP Guidelines state the county has an obligation to assure that NNL of ecological functions will be achieved within the SMP. Thank you.