

From: [Loretta Seppanen](#)
To: [Andrew Boughan](#)
Subject: [] Comment on the Up Castle Land Use & Rezone Amendment
Date: Friday, July 30, 2021 4:22:58 PM

Name: Loretta Seppanen

Email: Laurel.lodge@comcast.net

Comment: The Up Castle land is currently farmland, a small portion of which is National Significant Ag Land. This facts need to be shared with the Planning Commission and the general public. Please see the special maps of farmland created by the TRPC staff to confirm the ag land status. Most of the land is under Open Space Ag tax status designed to protect the land as farmland based on the incentive of lowered taxes for the land owner.

Time: July 30, 2021 at 11:22 pm

IP Address: 73.221.17.236

Contact Form URL: <https://thurstoncomments.org/comment-on-the-up-castle-land-use-rezone-amendment/>

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From: [Sandler & Seppanen](#)
To: [Andrew Boughan](#)
Cc: [Jennifer Davis](#)
Subject: RE: Please send a copy of the site plan attached to the SEPA Checklist for project CPA-19
Date: Monday, August 2, 2021 8:01:55 PM

Andrew,

Thanks for sending the item referred to in the SEPA checklist as the required attached site plan. The document provided does not qualify as a site plan. Since you have accepted the checklist and its reference site plan, this inadequate document should be made public.

I want to be clear with you that I completely disagree with your assessment that this is "simply to rezone the parcel." I also am requesting that you present this proposal in different terms to the Planning Commission and in any future communication with the public on this matter. Let me explain why I say this.

This is a request is to move from Rural Resource Residential Resource to Rural Resource Industrial land and to additionally change the Comp Plan wording about what is allowed in Rural Industrial Land. RRR 1/5 allows for housing, timber and ag. RRI does not. Changes in zoning is never a simple request, but part of the larger picture of what the community wants. As you are aware, a similar proposal is on the Docket in CPA-20. It is inappropriate to look at these matters in a piecemeal fashion applying to a single parcel (or two parcels in this case.) If RRI can be easily changed to include warehousing and manufacturing that is minimally or not at all related to ag, timber or mineral the door is open for a different rural character than that described in the Comp Plan and consistent with the many community meetings and comments that led to the approval of that description.

You are aware that the Growth Boards and the Courts have said that there must be a more rigorous review on a comp plan and zoning change than on permit decisions. Regulations and courts have said that SEPA must be conducted at the earliest stage possible when a proposal is known. The SEPA analysis should be robust enough to consider the impacts that will be foreseeable from the zoning change. That would include consideration of the future development of the land. A SEPA analysis needs to consider the impact of the rezone on the lands adjacent to this property including the housing in all three directions on the land in Thurston County along with the large Long Term Ag designated land just a few blocks to the west of the property. This is not "simply" a map change from one zone category to another zone.

Thurston County elects to hold off on doing a determination of significance, a SEPA analysis, until AFTER the community has been engaged via a public hearing and after the planning commission makes what could be an ill-informed recommendation to the BoCC - ill-informed due to the lack of a SEPA review. This is the process you must work under until it can be changed. Please be aware that I find the process choice made by Thurston County problematic - lacking in transparency and rigor. I gather that I am not alone in this view.

Similarly, the change to specifically allow manufacturing and warehousing on this site needs a robust SEPA analysis as it changes the Comp Plan concept

of RRI.

I request that you not minimize this rezone request when you speak to the Planning Commission Wednesday. I request that you reference the GMA requirements of rigorous review of comp plan and zoning changes. Lacking any rigor at this stage, I assume you will not ask the commission to set a hearing date at this time.

This property is farmland, and this county is seeking to achieve no net loss of farmland according to the Comp Plan. CPA-16 is working toward changes in policies and programs to better achieve that goal. One possible change could be to include these specific parcels in the larger LTA land just to the west of the parcels. The land under consideration has been in agriculture recently enough that as of today the assessor's office consider the land as Open Space Ag. To meet that requirement, it must show ag revenue per a specific tax IRS document in at least three of the last five year. The current owners bought the land in 2017, about five years ago. My assumption is that the current owners lease the land for hay and/or pasture. The assessor's office assumes it is still being used as pastureland per a call to them today. Pastureland is the key use of farm acreage in this county. I request that you share this information about the farming status with the Planning Commission on Wednesday night.

Loretta Seppanen
360 786 9775

-----Original Message-----

From: Andrew Boughan <andrew.boughan@co.thurston.wa.us>
Sent: Monday, August 2, 2021 1:33 PM
To: Sandler & Seppanen <Laurel.Lodge@Comcast.Net>
Subject: RE: Please send a copy of the site plan attached to the SEPA Checklist for project CPA-19

Good afternoon Loretta,

Thank you for your interest in the project. There is not a project specific site plan, but rather a general aerial showing the site and the adjacent transportation routes. There is no site work proposed with this project. The current proposal is simply to rezone the parcels to allow for future development options.

Please let me know if you have any additional questions.

Thank you,

Andrew Boughan | Associate Planner
Thurston County Community Planning & Economic Development Community Planning
Division
2000 Lakeridge Dr SW, Bldg 1, Olympia, Washington 98502
Andrew.Boughan@co.thurston.wa.us | www.thurstonplanning.org Cell Phone:
(360) 522-0553

-----Original Message-----

From: Sandler & Seppanen <Laurel.Lodge@Comcast.Net>
Sent: Monday, August 2, 2021 11:47 AM
To: Andrew Boughan <andrew.boughan@co.thurston.wa.us>

Subject: Please send a copy of the site plan attached to the SEPA Checklist for project CPA-19

Andrew,

According to the CPA-19 SEPA Check list item 14.a a site plan related to transportation routes was included attached. It is not included with the checklist online. Can you send that to me and add it to the documents online?

Loretta Seppanen

Andrew Boughan

From: Nathaniel Jones <donotreply@wordpress.com>
Sent: Tuesday, August 3, 2021 3:47 PM
To: Andrew Boughan
Subject: [] Comment on the Up Castle Land Use & Rezone Amendment

Name: Nathaniel Jones

Email: nkhl@comcast.net

Comment: Please do not advance this proposed Comprehensive Plan Amendment. With the proposed amendment, the proponent asserts that future development could be 500,000 square feet of warehouse space and supports this request by pointing to Lewis County infill development as a changed condition that makes the current agricultural zoning inappropriate. However, this logic fails to acknowledge Thurston County's land-use policies or the State's guidance on Comp Plan changes.

This proposal fails to comply with relevant Comp Plan Policies for RRI zoning, including:
Goal 1, Objective A, Policy 8, which supports those industries that are compatible with a rural setting,
Goal 1, Objective B, Policy 10, which allows rezones when circumstances have substantially changed since the current land use was adopted, and
Goal 1, Objective D, Policy 3, which allows the creation of more industrial land when current reserves have become inadequate.

This proposal fails to comply with relevant State GMA Planning Goals, including those that encourage the conservation of agricultural lands and discourage creating incompatible uses.

This parcel is currently in agricultural use. Converting this land to allow warehouses works against Thurston County's stated goal of no-net-loss of ag lands. Please reject this proposal. A more appropriate action would be to convert this property from RRR to LTA or Long Term Agriculture.

Time: August 3, 2021 at 10:46 pm

IP Address: 73.42.229.152

Contact Form URL: <https://thurstoncomments.org/comment-on-the-up-castle-land-use-rezone-amendment/>

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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



Thurston County Community Planning
Andrew Deffobis, Associate Planner
2000 Lakeridge Dr. SW
Olympia, WA 98502
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: [Kaitlynn Nelson](#)
To: [Polly Stoker](#)
Subject: FW: Wireless Committee Selection
Date: Wednesday, August 4, 2021 6:30:27 PM

Hi Polly,

We just received this public comment on the Wireless stakeholder group that will be discussed tonight. Can you please forward this on to Planning Commissioners and post online?

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Wednesday, August 4, 2021 6:16 PM
To: PlanningCommission <PlanningCommission@co.thurston.wa.us>
Subject: Wireless Committee Selection

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Planning Commission**

Subject:

From: **Christy White**

Email (if provided): wc6517@scattercreek.com

Phone: (if provided):

Message:

August 4, 2021

Hello Planning Commissioners,

My comments this evening are regarding the Wireless Stakeholder Group formation selection.

The objective and request has always been for citizen input. As stated in the June 10th memo from the Planning Commission to the Board of County Commissioners, quote " The Thurston County Planning Commission recommends that the BoCC form a citizens' committee to work on the proposed draft code changes." end quote. The direction of the Board County Commissioners in the July 28th memo to you states that quote ..." Planning Commissioners will review potential participants, determine who to invite to the stakeholder group, " end quote.

I was reminded by a fellow Thurston citizen, that the County government, it's employees, and various bodies, including the Planning Commission, exists for public service to citizens. County government is an extension of its citizens.

I mean no disrespect to industry representatives, however I do not believe they are citizens of Thurston County. The interests of the wireless industry have already

been expressed and delivered. Industry lawyers, employees, contractors, and others have no obligation or responsibility to what impact this code will deliver upon local citizens. The formation of this group and its activities are meant to provide a voice for those who pay property taxes, sales tax, and who have lives here in our extraordinary County. Through the County staff and the County consultant there is already more than adequate representation of the industry's needs and legal concerns.

The citizens on this list are willing, just as you do, to give of their time. These citizens are quality, professional, and level individuals seeking a positive process. Create committee membership, by your selections, which fosters engagement of citizen contribution. I ask and encourage (not because I am on the list) but for the intention and ask of your fellow neighbors, to select committee membership which values and supports an outcome for a great Wireless Code for all in Thurston County.

Thank you,
Christy White