



P.O. Box 1517
Bellingham, WA 98227

March 11, 2010

To: City of Blaine Planning Commission
344 H Street
Blaine WA 98230
CC: Michael Jones, AICP, Community Development Director,
Blaine City Council,
Barry Wenger, Shoreline Planner, Department of Ecology
Date: 3.11.10
Re: Blaine Draft Shoreline Master Program
Sent by email to: mjones@cityofblaine.com

Dear Members of the Blaine Planning Commission, City Council and Community Development Services,

SUBJECT: Blaine SMP

Thank you for the opportunity to comment on the proposed Blaine Shoreline Master Program update. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms, working forests, and shorelines for this and future generations. We have members in Blaine, Whatcom County and throughout Washington State.

The Blaine SMP is important because it encompasses the Drayton Harbor watershed. This is the only commercial shellfish harvest area in Whatcom County and the only Important Bird Area providing important habitat for migrating and resident bird species. The Harbor contains substantial eelgrass beds and also provides important habitat for surf smelt, sand lance and Pacific herring.

Unfortunately, Drayton Harbor, like much of Puget Sound, is challenged by increasing water degradation as a result of growth pressures, and on-going residential, commercial and agricultural activities. We are very concerned that the proposed shoreline master program is inadequate to protect the shoreline functions of Drayton Harbor and the other resources within shoreline jurisdiction. Our specific concerns are discussed below.

Basic SMP Information Remains Unclear

In drafting our comments, we struggled with internal inconsistencies and conflicts within the SMP and its associated documents. The majority of these problems, discussed in detail below, involved the shoreline reach environment designations, and the current status of the shoreline reaches. Conflicts existed between the shoreline inventory report, the cumulative impact analysis, the SMP regulations, and various shoreline maps.

We understand that these issues resulted, in part, from a prolonged delay between beginning and completing the draft SMP. As a result, some of the SMP documents reflect a draft date of 2006, while other documents reflect a 2010 update. Because this has impeded our ability to properly review and

comment on Blaine's draft SMP, we hope that the City will give serious consideration to allowing an additional period for public input when the SMP is forwarded for City Council approval.

We are concerned that final SMP provisions will not be properly implemented or enforced if clarity issues remain, resulting in a failure to adequately protect Blaine's shorelines. Thus, we ask that you thoroughly review and reconcile the SMP documents and provisions prior to enactment. For ease of review, we suggest that you create a matrix chart that integrates the shoreline reach number with the environment designation and applicable shoreline regulations, such as setbacks and buffers .

Conflicting Information Regarding Shoreline Reaches

Due to inconsistencies between the SMP and its associated documents, including the shoreline inventory, the cumulative impact analysis and shoreline maps, we remain unclear regarding environment designations of the shoreline reaches, and thus, applicable shoreline regulations and procedures. In some cases, crucial information regarding the reaches is outdated.

The Shoreline Inventory and Analysis Report and the Analysis of Cumulative Impacts documents reflect shoreline reaches that are no longer within the city's jurisdiction, although updated information is found in the Restoration Plan, the most recently updated of the SMP documents. Many shoreline reaches were rezoned by the County as rural and removed from the UGA. Currently, there is litigation regarding this matter. These reaches should either be removed entirely from Blaine's SMP, and the reaches renumbered, or, at a minimum, the current status of these shorelines areas and the connected litigation referenced.

We are, however, unclear regarding the status of reach 8. The Shoreline Inventory and Analysis Report indicates that it is wholly within the UGA, while the Restoration Plan indicates that it is within City jurisdiction. The Cumulative Impact Analysis document uses the same language as the Restoration Plan.

Some recent development and related impacts have not been updated and incorporated into the Shoreline Inventory and Analysis Report. As an example, current construction of a very large Lighthouse Point Water Reclamation Facility in reach 2, which will eventually replace the city's current wastewater facility, is not disclosed. Reference is still made to future plans for such construction. There is no mention of the new condominium buildings have been or are currently being constructed on the Semiahmoo Spit, or of improvements that were made at Marine Park.

We are concerned that the Shoreline Inventory and Analysis Report and Cumulative Impact Analysis documents do not accurately reflect the current water quality status of Drayton Harbor. There is no discussion of the on-going TMDL for the Drayton Harbor watershed, including Dakota Creek and California Creek, although this is the primary watershed for almost all of Blaine's shorelines. The TMDL project postdates the drafting of these documents and is based on the on-going degradation of the Harbor's water quality, a fact that is not properly highlighted in either document. (See DOE memo dated 8/3/2009 at http://whatcomshellfish.whatcomcounty.org/Drayton/documents/Drayton_Qtr3_2008-final.pdf and the TMDL Quality Assurance Project Plan at <http://www.ecy.wa.gov/pubs/0803105.pdf>.)

Our greatest struggle has been in determining the environment designations of the reaches. Based on review of the Shoreline Inventory and Analysis Report, reaches 3 and 15, and 1/3 of reach 2, are designated High Intensity. Every other reach has been designated Urban Conservancy. Additionally, reaches 6 through 14, 16 and 17 are concurrently designated as Natural "immediately adjacent to the shoreline." The phrase "immediately adjacent to the shoreline" is not defined, but could be clarified by

reference to SMP 17.81.230.D, which establishes the Natural environment designation. In sum, the shoreline inventory and analysis designates a few areas as High-Intensity and everything else as either Urban Conservancy or Natural.

In contrast, the Analysis of Cumulative Impacts document uses a Shoreline Residential designation for reaches 9-12 and part of 17 (although we note that these are the UGA areas that are no longer under City jurisdiction.) Both documents agree that in reaches 7 through 11 and 17, the "first 100 feet waterward from the ordinary high water mark have been proposed to be designated Natural." This language is slightly different than the language used in the shoreline inventory and again, should cross-reference or incorporate the specific regulatory language of SMP 17.81.240.D.

However, the Analysis of Cumulative Impacts document fails to mention a 100 foot Natural shoreline designation in reach 6, although it is unclear if this is just an oversight. Additionally, reaches 13, 14 and 16 are split between an Urban Conservancy designation and a Natural designation based on differences in land use rather than a limited area immediately adjacent to the shoreline as reflected in the Shoreline Inventory and Analysis Report. These documents need to be revised to reflect uniformity in language and reach designation.

Neither the Shoreline Inventory and Analysis Report nor the Analysis of Cumulative Impacts document reference an environment designation for Special Management Units (SMU), although this designation exists in SMP regulation 6.9 and a Draft Shoreline Designation Map (revised February 2, 2010, on Blaine website.) Since the SMP regulations and Map were updated in 2010, and the other documents are from 2006, we presume that the SMU is the current intended environmental designation, but all documents should be reviewed and brought into conformity.

It is also difficult to reconcile maps reflecting shoreline reaches with maps reflecting environment designations. We found no map that integrated these two crucially related items. SMP Policy 6.2. references the official shoreline map for the city of Blaine, titled the "Shoreline Jurisdiction and Environment Designation Map", but fails to indicate where this map can be found. A search of the Blaine website fails to retrieve a map of this title. We have been advised that the official map referenced in Policy 6.2 is the Draft Shoreline Designation Map on the Blaine website, but this should be made explicit. Maps reflecting on the reaches, but not the environment designations, are available as part of the Shoreline Inventory and Analysis Report.

We also question whether the 17 shoreline reaches have been properly delineated. In many cases, areas containing dissimilar characteristics and functions have been combined into the same reach. For example, the eastern 2/3rd of reach 2 is a park, while the western 1/3rd contains marine commercial development. Reaches 14 and 16 consist, in part, of the Semiahmoo County Park, and in part, of residential development within the Resort Semiahmoo Master Plan. Reaches 7 and 17 contain areas within the city's boundaries and areas within the newly designated rural area of the County. We suggest that the City revisit the appropriate boundary divisions for each of its reaches, particularly as some of the reaches will need to be removed from City jurisdiction.

Outdated Shoreline Inventory and Analysis Report

As we have noted above, the Shoreline Inventory and Analysis Report has not been updated. While thorough at the time of original drafting, it now fails to reflect current development, increased water quality degradation, the Drayton Harbor Watershed TMDL or the SMU environment designation. We

are concerned that, as a result, it may not reflect existing shoreline conditions and development patterns or their impact on the ecological health of Blaine's shorelines.

A shoreline inventory and analysis must be complete and accurate to direct the development of policies and development standards that protect shorelines in compliance with the SMP Guidelines. The importance of the shoreline inventory is discussed in the Department of Ecology's SMP Handbook, Chapter 7, found on the Department of Ecology website at <http://www.ecy.wa.gov/programs/sea/shorelines/smp/handbook/index.html>

Chapter 7 of the SMP Handbook explains that a shoreline inventory and analysis is the lynch-pin and the scientific foundation upon which the SMP and Restoration Plan are based. It establishes the ecological functioning of shorelines through the use of science, provides supporting information for environment designations, identifies areas for protection and restoration, and most importantly, it establishes the baseline for measuring no net loss of shoreline ecological function and for conducting the cumulative impacts analysis.

We are troubled that Blaine updated portions of its draft SMP regulations and Restoration Plan in 2010 without ensuring that this was based on an updated and accurate shoreline inventory analysis. As a result, it is unclear if the draft regulations and Restoration Plan are based on a solid foundation of facts and science. We request that the Shoreline Inventory and Analysis Report be updated and the SMP regulations and restoration policies be carefully reviewed in light of this situation.

Flawed Analysis of Cumulative Impacts Document

Problems with the Cumulative Impacts Analysis document, drafted in 2006, are similar to those of the Shoreline Inventory And Analysis Report as discussed above. This document requires review and revision based on updated information.

For example, the cumulative impacts analysis fails to reference and discuss the Special Management Unit (SMU) environment designation that pertains to both marinas. This is a serious omission because there will be significant additional development in both locations, and under the draft SMP, local City development standards for these master planned developments can replace SMP standards. Because water quality degradation has occurred under current city development standards, it is likely that the SMU standards will have harmful impacts on the shoreline's ecological functions.

This also illustrates how the cumulative impacts analysis fails to adequately review impacts from existing development. In the four year period since the cumulative impact analysis was drafted, existing land uses were identified as the source of the increasing loss of ecological function in the Drayton Harbor watershed. This was done in preliminary TMDL work and in other studies done to protect the Drayton Harbor shellfish area.

However, our greatest concern is that the cumulative impacts analysis fails to fully detail the nature and extent of anticipated shoreline or nearshore development, and thus, underestimates future, cumulative impacts. Additionally, the Cumulative Impacts Analysis document assumes that all future development will be fully mitigated and have no negative cumulative impacts.

The fallacy of this assumption is exemplified by examination of Reach 15, the Resort Semiahmoo Master Plan, which has a proposed SMU environment designation. The Cumulative Impacts Analysis

document notes that future development in this reach is likely to include expansion of Semiahmoo Marina and several mixed-use or multifamily residential developments. However, it is claimed that City regulations, including proposed SMP regulations, will require full mitigation, and that restoration projects will “likely help improve shoreline functions over time.” (Cumulative Impacts Analysis, page 11.)

The reality appears quite different. In the last 6 months, Trillium Corporation filed development applications for 3 major projects on or near the Semiahmoo Spit: Semiahmoo Marina expansion; Resort Semiahmoo residential and commercial development; and Burnside Village. In addition, Trillium submitted proposed changes to the City’s land use regulations pertaining to the Resort Semiahmoo Master Plan that would increase housing density and permitted impervious surfaces. These proposals are the subject of an on-going project and non-project SEPA review.

In totality, the proposals will result in 75 acres of development on both land and water, remove dense forest cover on 20 acres of currently undeveloped land, destroy wildlife habitat and native vegetation, increase traffic beyond Blaine’s ability to provide an adequate level of service (LOS F), increase landside hazards, increase human activity, light and noise, permanently alter the existing intertidal zone, and increase acceleration of climate change. The proposals include underground parking garages on the Semiahmoo Spit and a larger regional parking lot on property further upland.

These proposals generated extensive community comments and concerns regarding lack of adequate mitigation. Comments were received from members of the public, as well as the Whatcom County Planning Department, the Blaine Public Works Department and the local Fire Department. These comments have been summarized in a matrix attached as Exhibit B at the end of the D-EIS “Summary of the Public Scoping Process and Final Scoping Document”, which is being attached to this comment.

The cumulative impact analysis relies on outdated information, underestimates the extent of future shoreline development and impacts from existing development and overestimates the City’s ability to mitigate these impacts. This indicates that reliance on the cumulative impact analysis will likely result in SMP regulations and Restoration Plan that fails to protect Blaine’s shorelines.

“No Net Loss” Standards Are Not Met

A primary purpose of the SMP Guidelines is to ensure that new development does not result in reduced shoreline ecological functions, often referred to as a “no net loss” standard. Restoration activities are also a basis of achieving “no net loss.”

Threshold compliance with no net loss standards requires a baseline measurement of existing ecological functions in order to determine future development impacts. A baseline standard is generally developed through the shoreline inventory and analysis process. However, as discussed above, Blaine’s Shoreline Inventory And Analysis Report does not accurately reflect existing shoreline conditions and development patterns. The draft SMP fails to otherwise provide data and information constituting a baseline measurement. “No net loss” standards have no meaning without a baseline standard and this matter requires immediate attention.

Moreover, once a baseline standard is established, “no net loss” compliance is determined through on-going monitoring of shoreline ecological functions. The draft SMP fails to establish or require a monitoring program with concrete standards. The Cumulative Impacts Analysis document contains one

paragraph on “no net loss” (page 11, which incorrectly references the Everson SMP) that contains vague references to “a number of mechanisms”, none of which includes a monitoring program.

The Restoration Plan discusses monitoring and adaptive management (pages 17-18), but lists only general policy goals. Moreover, the Restoration Plan only requires monitoring and evaluation of “policies, goals, regulations and restoration efforts” every 5 years. To meet “no net loss” standards, monitoring efforts must be done on a consistent and on-going basis and measure shoreline ecological functions. A 5 year review period will not protect shorelines from no net loss.

While we recognize that the draft SMP includes regulations intended to meet “no net loss” standards, (SMP 17.81.590 and SMP 17.81.630) these regulations accomplish little without a baseline standard of ecological function and an on-going monitoring program.

Critical Areas Regulations

Pursuant to WAC 173-26-221(2)(b) and (c), critical areas regulations for shorelines within the SMP must be at least equal to the current level of protection provided by the Critical Area Ordinance (CAO). Such determination cannot be made at the current time because the Blaine CAO is the subject of ongoing litigation. We do note that, as enacted, the CAO does not address Drayton Harbor, marine shorelines or Class A streams.

The relationship between the SMP and CAO needs to be uniformly reflected within the SMP. SMP Goal 1.4 states that its provisions supersede those within the CAO, “provided that where this program references a provision or provisions of Chapter 17.82 BMC [the CAO] or any other Chapter of the Blaine Municipal Code that provision(s) so referenced shall apply when identified as applying.” The phrase “provision(s) so referenced shall apply when identified as applying” might benefit from redrafted language, but we interpret this to mean that critical area regulations for shorelines will be contained in the SMP regulations unless it is specified that CAO provisions apply.

SMP Policy 3.6A states that “Critical areas should be protected in accordance with policies and regulations established in Chapter 17.82 and 17.83 BMC adopted by Ordinance No. 09-2729 in 2009 with the exceptions noted in BMC 17.81 (Part 2 of the Shoreline Master Program). We interpret this to mean that critical shoreline areas are governed under the CAO subject to specific preemption within the SMP. Because this could create confusion, we suggest that the language for Policy 3.6A be revised to comport with the policy approach set out in Goal 1.4.

Buffers and Setbacks

The SMP fails to establish buffers for any of Blaine’s shorelines, and CAO buffer provisions do not address Drayton Harbor or marine shorelines. Instead the SMP provides setbacks for each environment designation. However, the SMP fails to specify the basis upon which the setbacks were determined, and thus, fails to establish that they are sufficient to protect shoreline ecological functions. WAC 173-26-201(2)(a). We recommend that SMP reflect the review and analysis of scientific and technical information in determining setbacks.

Similarly, we are concerned with the failure to incorporate meaningful shoreline vegetation standards into the SMP setback provisions. For example, the setback in the Urban Conservancy environment may be reduced, “based on significant enhancement of the setback area through planting of native vegetation.” However, the standards necessary to meet these terms and qualify for a reduced setback are

not specified. Similar problems exist with regard to reduction of the shoreline setback for the Shoreline Residential environment.

While the SMP regulations contain a provision for vegetation conservation, SMP 17.81.610, this regulation fails to establish minimal, quantifiable standards sufficient to even warrant enforcement. The only provision that would protect shoreline setbacks states that “vegetation clearing shall be limited to the minimum necessary to accommodate approved shoreline development.” We do not believe that SMP regulations satisfy the Guideline requirements of WAC 173-26-221(5)(c), calling into question the adequacy of the setbacks.

For further information and suggestions regarding the use of small buffers in areas of existing development, we are attaching a document containing Futurewise recommendations on this topic.

Environment Designations- SMP Regulations, Section 5

Aquatic: SMP 17.81.290

The draft SMP uses a land-water environment system where the water is placed in the Aquatic environment and the uplands are placed in other environments. The problem with this system is that most human uses of the water also have upland components. Consequently, any project with a water component will usually have to be compatible with two environment designations. This makes it very easy for a project to be allowed in the Aquatic environment, but not allowed in the upland environment - and maybe vice versa. This contradiction can create gaps and loopholes, resulting in bad shoreline development with unintended consequences.

We recommend that you look at how Jefferson County dealt with this problem. Alternatively, you should convert the Aquatic environment to a Deep-Water Environment and allow the shallow water areas to be considered with the upland environment. Either choice will likely require careful consideration and revision of draft SMP provisions.

Natural: SMP 17.81.300

In some reaches, there is more than one environment designation. In particular, some shoreline areas have a Natural environment designation that abuts the shoreline for 100 feet before the environment designation changes to Urban Conservancy or Shoreline Residential.

This creates conflicts between the more limited permitted and conditional uses in the Natural environment and the permitted and conditional uses in the adjacent environment designation. For example, Shoreline Residential and Urban Conservancy allow hard shoreline stabilization, docks and boat ramps, but the Natural environment designation does not. Where the shoreline designation is Natural for 100 feet, with a different environment designation for the remaining upland area, it should be made explicit that the Natural designation controls shoreline uses and water access.

With regard to the 25 foot setback from the Natural environment designation for residential development within adjacent Shoreline Residential and Urban Conservancy designations, you may wish to specify whether the development setback is allowed within the established setbacks for Shoreline Residential or Urban Conservancy designations, or whether it is in addition to these setbacks.

Shoreline Residential: SMP 17.81.380

There is a subtle but distinct difference between the goal of the Shoreline Residential environment designation reflected in the draft SMP and the goal required under the Shoreline Management Act. Since

the language used in the SMP will be relied upon in making future land-use determinations, it should be redrafted to properly reflect SMP Guideline requirements.

Under Blaine’s draft regulation, SMP 17.81.380, the purpose of the shoreline residential environment is to:

accommodate residential development and appurtenant structures that are consistent with the goals of RCW 90.58 and this program. An additional purpose is to provide appropriate public access and recreational uses.

In contrast, the SMP Guidelines, WAC 173-26-201(2)(d)(iv), allow for development of single-family houses:

where they are appropriate and can be developed without significant impact to ecological functions or displacement of water-dependent uses.

In other words, under the SMA, while certain uses are appropriate and must be provided for, no uses or development supersede the requirement to protect the environment. As drafted, Blaine’s Shoreline Residential designation places greater emphasis on accommodating residential development. The Shoreline Residential designation should be revised to more clearly establish that environmental protection is a predicate requirement for development.

Additionally, the Shoreline Residential designation needs to add specific standards controlling the wide range of water-dependent accessory uses and facilities that typically degrade shorelines. Regulations that reduce the proliferation of docks and beach access should be drafted to cover a number of different situations, including requiring shared facilities with adjacent lots, and prohibiting accessory docks for Multi-family residential. Docks for multi—family and new subdivisions should be approved as a separate use Boating Facility with additional requirements.

Urban Conservancy: SMP 17.81.420

The stated purpose of the Urban Conservancy environment appears at odds with permitted and conditional uses. The purpose of the Urban Conservancy environment is to protect and restore ecological functions in urban and developed settings while allowing for a variety of compatible uses.

However, permitted uses include roads and parking, duplex residential development, landfill and excavation associated with an approved development. Conditional uses include multi-family residential development, hard shoreline stabilization, piers, docks and boat ramps, and bulkheads. Multi-family residential development, docks, boat ramps, hard shoreline stabilization, roads and parking are high intensity uses that disrupt ecological functions. Therefore, they are incompatible with the Urban Conservancy designation and should not be allowed as either a permitted or conditional use.

Special Management Unit: SMP 17.81.460 and SMP 17.81.510

We are particularly concerned with the “Special Management Unit” environment designation that has been created for the Blaine Wharf District and the Resort Semiahmoo Master Plan. The standards for development in the Special Management Unit are simply approval of a substantial development permit. If the proposed development is consistent with City development regulations and draft SMP provisions pertaining to the preservation of shoreline ecological functions and processes, the proposed development is deemed to be in full compliance with Blaine’s SMP. In other words, development standards in the SMP are waived.

This violates SMA and SMP Guidelines unless City development standards have equivalent protection measures that warrant substitution of normal SMP standards, and even then, the City development standards must be approved by the Department of Ecology, and must be incorporated into Blaine’s SMP regulations. We recommend against this. Incorporating City development regulations into the SMP complicates review by Ecology and makes it difficult for Blaine to revise or update its development regulations.

Channel Migration Zone Provisions are Necessary

Protection of the Channel Migration Zone is an important requirement of the SMP Guidelines for riverine shorelines.¹ However, we did not see this issue addressed in the draft SMP. It appears there are no maps for channel migration zones, even though they are required.² Protection measures are needed for implement the SMP Guideline requirements – both in terms of uses that are inappropriate for locations in this ecologically sensitive and hazardous area, and in terms of shoreline modifications that can damage its functions.

Permitting Provisions Need Additional Development

A statement is needed at the beginning of the Permitting Chapter, SMP 17.81.160, that no uses, land and water alterations, or development shall be undertaken without obtaining a permit or letter of exemption to ensure conformance with the SMP. This provides the legal link to implementing the regulations.

Procedures in the draft SMP cover only permits. There are literally no provisions that govern administration or review of an exemption from the Substantial Development Permit. Yet this will be the most common form of review. This also means that the draft SMP lacks a way to require mitigation or impose limiting conditions on development, or to track the majority of shoreline development.

Furthermore the SMP intends that small residential lots close to the water will get reviewed through an exemption, whether for expanding existing residences or establishing new ones on vacant land. The level of detail needed to ensure that impacts are mitigated is very difficult. Yet there is no requirement that submittal materials be provided that the staff person can use to review the exempt development and ensure compliance with the standards. As currently designed development close to the water will be reviewed as an exemption with an exemption fee, even though the amount of work done and cost to the City will be as much as for a Shoreline Variance.

The exemption provision in the draft SMP needs to clearly state:

- That exempt development is only exempt from the Substantial Development Permit process, and is still subject to the Variance and Conditional Use Permit processes when applicable.
- That prohibited uses and activities can not be allowed under an exemption.
- That exempt development must still meet the SMP standards.
- That the exemption is not permission to degrade the shoreline.
- That exemptions are to be construed narrowly.
- That if any part of the development is not exempt the entire project must be reviewed in the permit.
- That a letter of exemption is required to document conformance with the SMP standards.
- That a project not qualifying for an exemption might still apply for a permit.

¹ WAC 173-26-221(2)(c)(iv) & WAC 173-26-221(3), and many references throughout SMP guidelines.

² WAC 173-26-201(3)(C)(vii).

- That sufficient documentation must be submitted for the administrator to determine that the project qualifies for the exemption and meets the development standards.
- That conditions may be attached to the letter of exemption to ensure compliance with the development standards.

The primary concern is that exemptions that don't have consistent rules will not be implemented to meet the policies and regulations of the SMP. A loophole or gap in permitting regulations will result in continued degradation of shoreline ecological functions.

Additional Comments And Concerns:

- While the Restoration Plan has a good description of restoration problems and opportunities, it fails to reference the draft SMP although this is a very document that the Restoration Plan is drafted to support.
- The draft SMP allows prohibited uses to be established by replacing existing nonconforming uses.
- The draft SMP fails to address all the uses and modifications referenced in the SMP Guidelines. As a result, such uses and modifications will, by default, be allowed pursuant to a conditional use permit without established development standards addressing that particular use or modification.
- The draft SMP fails to reflect mitigation sequencing required under the SMA.
- Under draft SMP provisions, commercial uses do not have to provide public access or restoration of functions for water-oriented uses, which violates SMP Guidelines. Additionally, the Guidelines require that industrial uses provide public access, but the draft SMP only provides for this in the Wharf District.
- Breakwaters, jetties, bulkheads, shoreline protection and shoreline stabilization do not have development standards that meet the SMP Guideline requirements.
- Piers and docks need additional standards regarding repair and reconstruction that will result in conformance with current design standards, including piling replacement, light transmission, reduced dimensions, etc. In fact, the draft SMP lacks any provisions regarding pier and dock dimensions
- New private boat ramps and covered moorage should be prohibited. They are convenience facilities. Private ramps are rarely used and public facilities are available when needed. Covered moorage creates large in-water impacts due to area shading and fish disturbance.
- The Draft SMP should include additional transportation and utilities regulations that address mitigation requirements, alternatives to building new bridges, and transportation lighting impacts on wildlife. Underground utilities need to avoid altering groundwater patterns that support streams and wetlands. Precautions are needed for utility water crossings using valves, sleeves, boring, and sufficient depth.
- The draft SMP needs to clarify that dredging for purposes other than those specifically authorized is prohibited. Unless this provision is added, dredging for any purpose will be allowed under a conditional use permit.
- Non-water-oriented recreation such as tennis courts, bowling alleys, sports complexes, etc., should be prohibited within shoreline land or should requiring a conditional use permit to provide some means of implementing the recreation priority.
- The draft SMP should require floodproofing through taller building foundations before permitting the elevation using fill, which consumes twice as much floodplain capacity for areas around the building.

- It appears that the draft SMP regulates marinas under SMP guidelines for Boating Facilities. The draft SMP needs to adopt development standards that conform to Guideline requirements.
- The SMP Policy and Goals promote tourism and the tour industry. Policy 3.1.C; Goal 3.2; Goal 3.3; Policy 3.3A. While this may be an appropriate policy goal for Blaine's Comprehensive Plan, we question whether this is appropriate for a SMP.

Thank you for considering our comments. If you require additional information please contact Wendy Harris at w.harris2007@comcast.net or 360-922-0442.

Sincerely,

Cathy Lehman
Chapter Director

Wendy Harris
Steering Committee Member