



July 27, 2009

Honorable Barry Buchanan, Council President
Bellingham City Council
210 Lottie Street
Bellingham, WA 98225

Sent by email to: smpupdate@cob.org

Re: Bellingham Shoreline Master Program Update

Dear Council President Buchanan and City of Bellingham Council Members:

Thank you for the opportunity to comment on the proposed Bellingham 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. Futurewise has members across Washington State, including many in the City of Bellingham.

The draft Shoreline Master Program (SMP) has many good elements. Some of the key provisions, which we strongly support, are:

- The excellent buffers used to protect intact shoreline areas, wetlands, and streams. Buffers are very important for providing fish and wildlife habitat, bank stabilization, filtering and treating surface water runoff, and cleaning groundwater passing through them, among other functions.
- The SMP proposes enhancement measures to native vegetation along the lake. Maintaining native vegetation along the lake is needed to maintain terrestrial insects and detritus on lake organisms and fish and which is necessary to maintain the health of the fish populations in lake Washington.¹ Native vegetation also helps to filter pollution out of the runoff that enters the lake. Emergent vegetation along the lake's shoreline can effectively reduce wave energy and property erosion.² Native vegetation also reduces the number of unwanted geese on the shoreline, reducing their negative impact on properties along the lake.
- The most intact shorelines are protected with a Natural designation. This will help protect them from adverse impacts.

However, we do have some significant concerns. Below we provide our recommendations to improve SMP. Our comments include the regulations and the Restoration Plan.

¹ Tom Kahler, The Watershed Company, and Martin Grassley and David Beauchamp, Washington Cooperative Fish & Wildlife Research Unit, *Final Report: A Summary of the Effects of Bulkheads, Piers, and Other Artificial Structures and Shorezone Development on ESA-listed Salmonids in Lakes* p. 48 (Prepared for the City of Bellevue: 13 July 2000). Accessed on July 22, 2009 at: http://www.ci.bellevue.wa.us/pdf/Utilities/dock_bulkhead.pdf

² *Id.* at p. 49.

On a separate issue than the regulations, we are concerned that an adequate notification effort has not been undertaken. Futurewise did not receive notice of the current adoption effort, even though we were supposed to be in the SMP update e-mail notice list. We learned of the release of the new document and the hearing by accident from other people only last week, thus we have not had adequate time to review the details of the draft Shoreline Master Program. Our comments below are consequently limited to a few major issues we identified, and a few general subject areas. In reviewing our comments, please keep in mind that the Cumulative Impact Analysis has not been released, and that many of the issues in our comments indicate that shoreline development will have significant cumulative impacts unless the issues are fully addressed.

Recommendations on the Shoreline Master Program

Organization of SMP

The General Regulations apply to all or almost all development. They have been placed at the end of the ordinance, with the specific use and modification requirements placed in front of them. We recommend that the General Regulations be placed first so the reader gains an understanding of requirements for all development, before reading the specific regulations, which add onto the general regulations. This will help readers better understand the requirements of the SMP.

General

The Preface of the SMP lists the 3 policy statement paragraphs from the Shoreline Management Act (RCW 90.58.020). However, some of the most very important policy statements are not included in the actual policy and regulations. We recommend that they be moved to the policies or regulations. It is very important that these principles be very visible in the SMP to ensure their consideration in implementation of the SMP. One of the most important statements is: “This policy contemplates protecting against adverse effects to the **public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life**, while protecting generally public rights of navigation and corollary rights incidental thereto.” We recommend this provision be adopted as a policy in the SMP.

We noted that Section 22.01.40 includes 3.5 pages of directions to the Dept. of Ecology, which are not needed in the SMP.

Shoreline Jurisdiction

Section 22.03.10(d) provides a list of features that are under Shoreline Jurisdiction. This list also needs to include the associated wetlands and river deltas.³

³ RCW 90.58.030(2)(f).

Critical Habitats Requiring Protection

The SMP Guidelines include mudflats as a critical habitat.⁴ While it is listed in a habitat policy, apparently designation and protection measures for habitat do not include mudflats and they should. This may be the case for other habitat items listed in the Shoreline Master Program Guidelines.

Enforcement

Enforcement in the SMP is covered fairly well. However we recommend adding more details and authority for how to do enforcement. We have three recommendations to better cover costs of enforcement and discourage violations. If a jurisdiction has a ineffective enforcement system, it is extremely unfair to law abiding citizens, because it penalizes them by making obtain a permit, and rewards those ignoring or breaking the law by having not consequences. We recommend:

- 1) The penalties should be increased to better cover costs of enforcement and discourage violations. Violations should be required to pay a penalty fee of double or triple the normal amount, and require violations that might have qualified for an exemption to pay variance fees for whatever standards they didn't follow at the double or triple fee.
- 2) The City should include fines as one of the methods of enforcement and may want to consider making shoreline master program violations infractions, like speeding tickets, where certain classes of violators would receive a notice of infraction by a deputized enforcement officer.
- 3) The City should withhold other land use and building permits until the violation is resolved.

These are steps that contribute to effective and efficient incentives to comply with the law and protect our important shoreline resources.

Allowed Uses

This use provisions are perhaps the most troubling issues in the draft SMP. Most SMPs have one of two systems (described below) for handling uses, or a combination of the two. The draft SMP leaves *serious doubts that it complies with the use provision requirements in the SMP Guidelines.*

The SMA and SMP Guidelines cover several different types of uses: Commercial, Industrial, Boating Facilities, Residential, Transportation, Forestry, Agriculture, etc. A jurisdiction's SMP is supposed to carefully consider each type of use for its suitability in each environment and determine whether it should be allowed as a Substantial Development, Conditional Use, or if it should be prohibited. This typically takes two forms. Some jurisdictions use a Use Table that cross references different types of uses and modifications (along the side) with the different environments (across the top), and indicates whether they are allowed in the cells of the table. Some jurisdictions include a section at the end of each type of use and modification, and describe what is allowed or prohibited each environment. Some jurisdictions use a combination of the two. Lastly, the jurisdiction is supposed to carefully consider what development standards should be applied to each type of development when it is allowed.

⁴ WAC 173-26-221(2)(c)(3)(A)

The draft SMP does not use either of these systems. It has entries in the environment descriptions that mostly discuss water-dependency, and summarizes these in the development standards table. This approach creates several problems:

- Within the description of each environment, the SMP usually states that uses are allowed mostly based on its water-dependency category. In most environments, ALL uses are allowed, though some may be conditional uses. For example, in the Urban Conservancy environment, industrial uses, commercial uses, and all the resource uses (mining, forestry, and agriculture) are allowed, even though they may be incompatible with the intent and purpose of the environment. This is the case for most environments. The consequence is that uses are allowed far too broadly for most environments.
- In many environments, uses are allowed based on the zoning ordinance. Some state that Zoning Conditional Uses are to be reviewed as Shoreline Conditional Uses. This is not the intent of the Shoreline Conditional Uses, which are supposed to be based on a use's compatibility with the shoreline environment it is in, not on zoning compatibility. Relying on the zoning ordinance also results in it becoming part of the SMP, which means that it may not be changed without an SMP update and approval by the Department of Ecology. We recommend against this to avoid un-necessarily complicating the SMP and its approval.
- No environments include the concept of "use-intensity." This means that, in addition to all uses being allowed, any intensity or scale of those uses is also allowed. Some environments, such as Natural and Urban Conservancy, are specifically intended in the SMP Guidelines⁵ to be reserved for the lower intensity uses. Without such limits, these areas eventually change to no longer meet the criteria of the environment they are designated.

These three points are contrary to the intent of the SMP, which is to base allowed uses and conditional uses on whether they are suitable for the environment. We strongly recommend you look at the use provision systems developed by other cities. The Thurston Regional Planning Council and Jefferson County have developed systems that you might find useful.

The SMP is silent on mining and agricultural uses. If an SMP does not address a use, it is allowed everywhere. Furthermore, since there are no specific standards for these uses, they are allowed without any requirements specific to them. This needs to be corrected.

While there is some attempt at describing allowed uses in the draft SMP, there are no provisions to indicate in which environments the different modifications are appropriate. This leaves them unrestricted such that each of the many modifications is allowed everywhere, even the Natural environment - which is supposed to remain largely in its natural state rather than altered with modifications.

We recommend putting the use provisions if the SMP (allowed or not, what permit type) in a formal Use Table. The benefit of a use table is that it consistently captures all the use and permit level information in the SMP into one location for the reader to look, rather than

⁵ WAC 173-26-211(5)(a) and (e)

having it scattered throughout the entire SMP document. We recommend screening each section of the SMP for use and permit level provisions, and moving them to the table.

Subdivisions

A policy is needed to protect critical areas in shoreline jurisdiction during subdivision – something like: “To stop the parcelization of certain critical areas among many owners and better protect critical area functions, subdivisions that include them should include extensive critical areas in separate tracts.” A related regulation would be: “Subdivisions that include streams, wetlands, their buffers, Floodways and CMZs, and (some) geologic hazards shall provide them with long-term protection in the form of either critical areas tracts using separate parcels, or attaching such areas to one of the subdivision parcels. Such areas shall be held in common by the subdivision landowners or by just one landowner”

Commercial

A quirk of the SMP guidelines is that Community Services, such as government buildings/uses, churches, hospitals, etc. is not described specifically. Since they have many of the same characteristics, we recommend including them with commercial uses, such that the category becomes Commercial and Community Service. This will avoid having a gap in the regulations for that type of use. The change would need to be made in several places in the document. This also ensures they are not left out of the general intent of the SMP Guidelines to limit non-water-oriented commercial and industrial uses.

Parking

Glare from parking lot lighting is an important impact on fish and wildlife habitat. A standard needs to be added that minimizes and avoids illumination of the water, setback/buffer areas, wetlands, and other wildlife habitat areas.

Transportation

Historically, transportation projects have had some of the most destructive impacts on shoreline ecological functions. Linear transportation projects have special characteristics that need to be addressed with detailed regulations to deal with the inherent impacts they have. We recommend using mitigation sequencing to reduce or avoid the impacts by providing details specific to transportation uses.

The Transportation section has a number of good provisions. However additional clarification is needed relating to the mitigation sequencing aspect of avoidance, using language similar to the following: “Facilities should be located out of shoreline jurisdiction unless there is no feasible alternative. When necessary, they should be located as far landward as possible.”

A regulation is needed that addresses a practice that can do as much damage as an actual project: “To prevent secondary impacts from transportation projects, the disposal location of excess material and waste materials shall be disclosed in submittal materials.”

Additional standards are needed to deal with the peculiarities of linear transportation projects impact on water systems by covering the issues below:

- In floodplains, construct linear transportation corridors at grade or otherwise provide flood water pass-through, especially for flood overflow channels.

- Don't cut off or isolate hydrologic features
- Minimize the number of bridges, by first requiring the use of alternative access points, sharing existing bridges, and sharing new bridges with adjacent lots whenever possible.
- Span both the OHWM & floodway.

Other jurisdictions sometimes include non-linear transportation facilities (airports, ferries, etc.). The draft SMP focuses this subject on linear facilities. We recommend clarifying what to do with central transportation facilities: airports and bus terminals should be treated as commercial and community services; ferry terminals should be treated as ports or high intensity; maintenance facilities should be treated as industrial or commercial and community services.

It is unclear whether access roads and driveways have to meet these standards, yet they can have as much impact (at a localized scale) as a larger facility. They have bridges and segments that may run parallel to the shoreline and these aspects need to meet the same standards as other transportation facilities.

Utilities

Like the Transportation section, the Utility section needs additional standards to deal with the peculiarities of how utilities impact water systems:

- The standards should address major facilities (sewer plants, water treatment, transfer stations, substations, power generation, etc.) specifically and limit them to only their water-dependent components or prohibit them.
- Avoid transmission line failures due to stream bed mobilization. In the CMZ or floodway and near streams, locate 4 feet below the bed or 1/3 of bankfull depth.
- Require lines under water features to be placed in a sleeve to avoid the need for excavation in the event of a failure in the future.
- Use an installation method preference order to reduce impacts of utility crossings. The preferences should be: Clear span, attach to bridge, boring, plowing, trenching.
- For underground utilities in high groundwater areas, prevent french-drain effects from draining/rerouting groundwater patterns that support wetlands and streams. Use native soil plugs or collars that interrupt gravel pipe-bedding spaced at intervals. Prohibit the use of under-drains (perforated drain pipes under the main line).
- Treat roads associated with utilities as roads.
- Return grade to previous or better condition that provides for normal floodwater passage.
- New underground utilities always have excess material. Always require disclosure of excess material disposal locations before approval to prevent secondary damage to the shoreline.

It is unclear whether utility services to individual uses have to meet these standards, yet they can have as much impact (at a localized scale) as a larger facility. They have stream crossings and segments that may run parallel to the shoreline and these aspects need to meet the same standards as other utility facilities.

Dredging

As noted under Uses and Environment comments, above, the modifications such as dredging for any reason are allowed in all environments. To some extent, the text limits when dredging is allowed. However, dredging should be carefully limited to water-dependent facilities, navigation, habitat restoration, and maintenance of existing facilities. Other dredging should be prohibited. The dredging regulations should note that disposal of dredge material on lands should be considered as fill.

Fill and Excavation

The SMP doesn't address excavation (digging outside the water). We recommend grouping it with fill, as the standards often work for both situations. Similar to dredging, the purpose for the fill in water and wetlands needs to be differentiated. It should only be allowed for water-dependent facilities, navigation, habitat restoration, and maintenance of existing facilities. Fill in the water for other purposes should be prohibited. Fill and excavation in channel migration zones (CMZs) should be very limited through a conditional use permit. These limits need to be included in the table.

Similar to transportation and utility regulations, there should be a provision for excavation to disclose the location of excess excavation material to prevent secondary impacts.

Restoration Projects

Both the Policies and Regulations should include a statement that stand-alone restoration projects and mitigation enhancement work should be consistent with and use information from the Restoration Plan. It is an important link between all the required parts of the SMP Guidelines.

Shore Stabilization

The Shoreline Stabilization section is only 2 pages long. As a comparison, other jurisdictions often have 5-10 pages of standards. This is because the details required in the new SMP Guidelines require many aspects of stabilization to be addressed. As written, the stabilization provisions do not meet the requirements in the SMP Guidelines. We recommend you look at stabilization provisions from other jurisdictions to use as templates. The City of Kirkland has thorough stabilization provisions; the Thurston TRPC has provision for a wide variety of stabilization methods, including breakwaters and jetties in the draft shoreline master program it has prepared for the cities in Thurston County.

Boating Facilities, In-stream Structures, Pier, Floats and Pilings

These four sections (22.09.70-90, and 22.09.20) all address similar issues. The two that specifically address piers don't really cover the issues adequately. They are mostly about boating structures, but don't cover the wide range facilities like ramps, canopies, and lifts. Buoys are covered in only one item under In-stream Structures. Boathouses are not addressed, and new ones should be prohibited. In addition, the issue of repair and replacement is not addressed as it relates to bringing piers and docks into conformance with the code as substantial parts are replaced over time. We recommend that you supplement the materials to fully address the issues. We recommend you look at other jurisdictions to use as templates. The City of Kirkland and City of Kent have thorough piers/docks provisions.

Most SMPs have just one section for piers, docks, etc. and one section for “Boating Facilities” (using the SMP Guidelines term). Some, but not all, include “In-stream Structures.” Boating facilities typically address the peculiarities of larger multi-user pleasure boat facilities such as marinas and public boat launches (sewage handling, safety, garbage, lighting, navigation, etc.), and leave the detailed regulations for boating structures to the pier/dock section. The piers, docks, etc. sections typically deal with specific issues of non-boating piers/docks, and the details of boating structures (ramps, lifts, etc.). We recommend that these sections be clarified along these lines. We recommend that the piers/docks section be titled “Piers, docks, and boating structures.” Boating Facilities is written well.

Of particular concern is the lack of clarity on whether piers/docks can be built for multi-family residences. Note that the WAC for Piers and Docks⁶ states: “New piers and docks shall be allowed **only for water-dependent uses** or public access. As used here, a dock associated with a single family residence is a water dependent use provided that it is designed and intended as a facility for **access to watercraft...**” This has several consequences:

- (1) Residences are not water-dependent. However, a special exception is made for single family docks. Single family docks for purposes besides “access to watercraft” are not allowed. Note that detached docks or floats for single family recreation would not be allowed.
- (2) Docks for other residential uses (multi-family & long-term room rental) are prohibited since they are not water dependent. The SMP should be clarified on this point. Existing facilities would be nonconforming uses that can continue, but should not be expanded.
- (3) All other uses must be water-dependent or provide public access to have a dock/pier or a float. This standard needs to be added to a pier/dock section.
- (4) These provisions also apply to piers/docks used for **non-mooring** purposes. Examples include ship cargo handling, ship fueling, boat building/repair, in-water utility facilities, public docks for fishing or swimming, etc.

The piers/docks section for single family residences needs to address the problem of the proliferation of boating structures, as required by the SMP Guidelines;⁷ and we recommend adding specifics to better guide how it’s done. This is a primary issue for us, as it is needed to protect the shoreline functions. We recommend that a policy be added or expanded to be similar to the following strategy to reduce proliferation. Some of these items may already be in the SMP, and specifics of the text below may need to be changed to deal with the structures that are most common in your jurisdiction.

“Avoid the proliferation of pier/dock & boating structures through the use of mitigation sequencing, using the following preference criteria:

1. New single family residential subdivisions may only use shared or community facilities. Such facilities should have limits on their size, and single-user structures are not allowed.

⁶ WAC 173-26-231(3)(B)

⁷ WAC 173-26-231(3)(B)

2. For existing single family residential lots:
 - Non-waterfront lots may not have boating structures, but rather must use a marina or community or public facility.
 - Waterfront lots first should try to share nearby existing facilities or use nearby public facilities. When that is not possible, new facilities need to be shared with adjacent or nearby lots that do not have facilities, if there are any present. Cost sharing or late-comer agreements should be allowed, similar to those used for shared roads/driveways and utilities.
3. Multi-family development is not water-dependant, and may not have such structures.
4. Non-Residential uses should share an existing or new facility whenever possible before building a single-user facility.”

A related mitigation sequencing policy is also needed. A section like this should be included:

“When a new pier/dock & boating structure is warranted or necessary, avoid the use of more-impacting structures through the use of mitigation sequencing using a preference for less-impacting facilities. Proposals shall demonstrate that a less impacting structure won’t work before using a more impacting structure in the preference list below. For platform or mooring structures, the minimization sequence is in the following order of preference: Avoidance, Buoy or Float, Dock/pier, Solid quay (review as fill/excavation and stabilization instead). For launching structures, the minimization sequence is in the following order of preference is: Avoidance, Soft ramp (for rare-use site), lifts that do not result in additional overwater coverage when the boat is stored, rails, hard ramp (also review as fill/excavation).”

In developing implementing regulations, we recommend including a requirement to demonstrate why a lesser impacting facility will not work before a greater impacting facility will be approved.

Setbacks, buffers, and vegetation management

The SMP includes “shoreline buffers”, and “stream” and “wetland” buffers, and has vegetation management requirements. These vary by the environment and the reach within environments, as described in the Development Standard Matrix, and in Section 22.08.100. The wetland, stream, and lake buffers are mostly based on science in the range of 100-200 feet depending on the feature, and are excellent examples of using buffers.

However, there are some areas where buffers are not based on science:

- Waterfront environments 0’ or 25-50’
- Maritime environments 0’ or 45’
- Residential environment 50’
- Whatcom Marine reaches 50-75’

These buffers are not based on science, but rather on the existing development patterns and the ease of development in the future. In addition, if these areas are devoid of vegetation, new development is not required to correct the deficiency for most of these areas; with the exception of the Whatcom Marine reaches, where revegetation is required.

As a general rule, this approach of using small buffers is inadequate. *However*, as its used in the Whatcom Marine reaches, small buffers may be acceptable because the area is already developed, the location is carefully mapped to the developed areas, and the system includes a demonstrated commitment to enhancing these degraded shoreline areas where it is possible.

We recommend establishing a similar system for the other areas, especially Lake Whatcom. The primary degradation along Lake Whatcom is the elimination of the natural vegetation, alteration of the shorelines, and elimination of wildlife and fish habitat. This has contributed to the other problem of water quality in the lake. The system of requiring enhancement for new development in some of the environments and reaches needs to be applied to these degraded areas if the City wants to use smaller buffer sizes. The amount of revegetation could be at a smaller scale, if needed. We recommend you look at how the City of Kirkland dealt with this issue, although that is a much more densely developed area, with fewer enhancement opportunities than the Lake Whatcom area has.

Using such a system will result in a gradual increase in vegetation and habitat for fish and small animals over time. This will meet the requirement⁸ to plan for restoration of the jurisdictions degraded shorelines, and meet the requirement⁹ to achieve overall improvements in shoreline ecological functions. It will also help improve the water quality of the lake. *These are some of the most difficult requirements to meet for urban locations. Bellingham's SMP has partially implemented such a system, it just needs to complete it.*

Restoration Plan

The Restoration Planning requirement¹⁰ states that jurisdictions have to plan for enhancement of their degraded shorelines. It also states that they have to consider enhancement that results from non-regulatory programs, which the Restoration Plan does well. However, jurisdictions also have to consider regulatory programs, as well. The Restoration Plan doesn't address the actual policies and regulations of the SMP – the very product coming out of the update effort. The Restoration Plan needs to include the enhancement outcomes SMP policies and regulations, but more importantly, the SMP regulations need to address the largest areas of degraded conditions – the Lake Whatcom area and the Waterfront and Maritime environments. Of particular concern is that degraded vegetation areas need to be addressed during new development, so they can actually buffer the impacts of the development.

⁸ WAC 173-26-186(8)(c).

⁹ WAC 173-26-201(2)(f).

¹⁰ WAC 173-26-186(8)(c).

The Lake Whatcom area is discussed above. The Waterfront and Maritime environments present another important issue that needs to be dealt with. In the SMP Guidelines, both commercial and industrial uses are required¹¹ to provide ecological restoration as mitigation for impacts. However, any restoration requirements for vegetation and wildlife placed in previous drafts to meet the Guidelines have been eliminated for these shoreline environments.

These areas are to be redeveloped. Thus the existing uses will be removed and replaced by new uses. Not only does this meet the trigger for ecological restoration in the Guidelines, but there is also an opportunity to provide for vegetation and wildlife restoration – not just cleaning up pollution. The dimensions of the areas in question are much larger than the dimension of shoreline jurisdiction. Large portions of the properties in question have dimensions on the scale of ¼ to 1/3 of a mile (1600 or 1700 feet in some places). The shoreline jurisdiction only extends 200 feet from the water. A science-based buffer would only extend 100 feet.¹² The opportunities for restoring vegetation and wildlife are immense.

There are creative means of providing this kind of restoration in order to accommodate new uses and protect marine functions. Other widths could be considered, buffer averaging could be used, etc. But to simply say no restoration is needed, or it only has to be done with very narrow buffer (25' or 45') is contrary to the intent of the Act and Guidelines. Protecting the “land and its vegetation and wildlife, and the waters of the state and their aquatic life” is one of the primary policies of the Shoreline Management Act.¹³

The SMP also supports the idea of enhancement. The SMP's Restoration and Conservation Goal states:

“Restoration and conservation should occur via comprehensive restoration planning, public land acquisition, placing of conservation easements, site design and as development / redevelopment occurs.”

The following objectives implement the Goal:

- (d) “Redevelopment should be encouraged to improve ecological functions and restore riparian buffers where feasible.”
- (e) “Shorelines of Lake Whatcom should be restored in such a manner that bulkheads are removed, in-water structures are minimized, and a variety of native vegetation is planted within close proximity to the shoreline so that natural processes are reintroduced.”
- (k) Indicates that pocket estuaries should be restored with redevelopment

These goals and objectives developed for the SMP support the idea of requiring enhancement or restoration as new development and redevelopment occurs. The Restoration Planning requirement in the SMP Guidelines requires jurisdictions to plan for restoration of its degraded

¹¹ WAC 173-26-241(3)(d) and (f).

¹² EnviroVision, Herrera Environmental, and Aquatic Habitat Guidelines Working Group, *Protecting Nearshore Habitat and Functions in Puget Sound: An Interim Guide* pp. III-34 – III-49 (October 2007). Accessed on July 27, 2009 at: http://wdfw.wa.gov/hab/ahg/nearshore_interim_guide_october_2007_final_draft.pdf

¹³ RCW 90.58.020.

Honorable Barry Buchanan, Council President Bellingham City Council

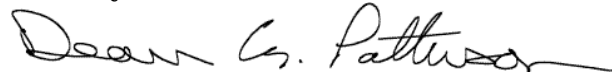
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areas. The SMP is already doing this for other areas, yet it waives the requirement for the very area where degradation is greatest and where the opportunity to correct it is greatest. Enhancement is needed to help recover Puget Sound. We recommend that the required buffers and enhancement requirements be increased to protect Puget Sound for uses that are not water dependent.

Thank you for considering our comments. If you require additional information please contact me at dean@futurewise.org or 509-823-5481.

Sincerely,

A handwritten signature in black ink that reads "Dean G. Patterson". The signature is written in a cursive style with a long horizontal flourish at the end.

Dean Patterson
Shoreline Planner
Futurewise