

PUBLIC COMMENTS AND KING COUNTY RESPONSES
June 2007 Public Review of Draft Shoreline Master Program

Summary of Comment	King County Response	Commentor(s)
SHORELINE JURISDICTION		
<p>Kent Valley resident objects to property being in shoreline jurisdiction, has concerns about water from nearby developments, inaccurate flood mapping, surface water requirements, and restoration projects.</p>	<p>Part of the property is in the current shorelines program. The most current FEMA floodways mapping was used; however, the state requires associated wetlands also be included in shorelines jurisdiction, and when those are included an additional amount of acreage is added under the proposed shorelines program. The property is not currently in any funded or planned restoration project. The Shorelines Master Program relates to permitting of development and does not modify the Surface Water Design Manual requirements. Objection to inclusion in the program noted.</p>	69
<p>The definition of ordinary high water mark unfairly favors property with bulkheads, which can determine the ordinary high water mark, while those who have a natural shoreline might have an ordinary high water mark 40 feet inland from neighbors with bulkheads.</p>	<p>Regulations discourage the building of new bulkheads that can artificially change the placement along the shoreline of the ordinary high water mark. New development must use the ordinary high water mark as the waterward delimitation for measuring building setbacks, and it is defined in the same way for all such construction. However, some older bulkheads are grandfathered into the shorelines master program, and these may not follow current ordinary high water mark policies.</p>	25
<p>Do not expand shoreline jurisdiction along Duwamish River.</p>	<p>The Duwamish River shoreline and floodplain have been considered a shoreline of the state since the Shoreline Management Act was enacted in 1971. King County is not proposing any changes to the shoreline jurisdiction associated with the Duwamish River.</p>	29
<p>Objects to property being included in the shoreline jurisdiction.</p>	<p>Without knowing the specific location of the referenced property, King County cannot determine if it may be inappropriately included in the shoreline jurisdiction. The State defines the area that is under the jurisdiction of the Shoreline Management Act (RCW 90.58).</p>	139
<p>The definition of associated wetlands is limited. Associated wetlands can occur well outside of the 200-foot limit if they are functionally connected to a larger water body within jurisdiction.</p>	<p>The footnote was removed from the Introduction because it may have been misleading; King County incorporates the definition of associated wetlands from the Shoreline Management Act.</p>	164

Summary of Comment	King County Response	Commentor(s)
GOALS		
<p>Need stronger Program to protect shorelines It is apparent that current land use policies and regulations have not been adequate to protect nor improve the health of Puget Sound. More than 46 marine species are now at risk. Nearshore and marine riparian areas continue to be degraded.</p>	<p>The draft updated Shoreline Master Program significantly improves on previous King County shoreline protection requirements. Via this update, the critical areas regulations (adopted in 2004) will be incorporated into the Shoreline Program. These regulations were developed considering the best available science and were analyzed to ensure that protect existing ecological functions and values. King County is open to suggestions for more serious consequences to address violations.</p>	175, 176
POLICIES AND REGULATIONS		
Conservation Policy		
<p>The conservation element should include marine shorelines as a specific distinct conservation element.</p>	<p>Marine shorelines are addressed in the critical areas section of the Conservation Element.</p>	176
Economic Development Policy		
<p>The economic development policy should include the phrase, "provided there is no net loss of ecological functions of the shoreline zone and the natural shoreline character is preserved."</p>	<p>Preventing the net loss of ecological functions and protecting the natural shoreline character is addressed in other policies.</p>	176
<p>The policy for economic development should exclude marine shorelines when planning for industries, industrial projects, commerce and transportation facilities (except for public use).</p>	<p>King County is following State guidance (WAC 173-26-191(1)(b)) in planning for economic development.</p>	176
Designations - General		
<p>It would be more useful to list characteristics that do apply to Rural Areas, such as defined in RCW 36.70A.170, rather than those that don't in determining designations.</p>	<p>The characteristics of non-rural areas were used as criteria for the purpose of creating a decision-tree for designation. A new section was added to the introductory section on designations to clarify designation criteria.</p>	171
<p>To what degree will ecological functions will be preserved? c) feels it would be more useful to list characteristics that do apply to Rural Areas, such as defined in RCW 36.70A.170, d) the development intensity along ? (pg 5-3)</p>	<p>Text clarifying that protecting and restoring ecological functions (as well as providing public access and recreation) to the maximum extent practicable was added to the introductory to section on designations.</p>	171
<p>Development standards should be defined for all shoreline designations.</p>	<p>The format for discussing development standards has been revised so that it is consistent throughout the Plan.</p>	164
<p>There is no correlation between shoreline reach quality and shoreline designations. These assessments do not seem based on the same sized shoreline units, making it difficult to analyze the relationship between these two attributes.</p>	<p>The shoreline characterization analysis defined reaches based on geomorphic boundaries. The shoreline designations were applied considering reach and basin ecological conditions and other land use considerations (including zoning, public ownership, and locations of FEMA floodways and channel migration zones). Shoreline reach boundaries were refined in the designation process as a part of considering these other land use issues.</p>	168

Summary of Comment	King County Response	Commentor(s)
Zoning is the basic criteria for most of the shoreline designations. What role does the shoreline inventory and characterization play in the designation of shoreline environments? It should be a major factor. In general, please describe the designation and restoration plan rating criteria.	A section has been added to the description of shoreline designation to clarify how the shoreline characterization and restoration plan ratings have been used. The Conservancy, Rural and Natural designations rely in part on restoration priorities and thus the results of the shoreline characterization.	164, 168
We are unclear regarding the designation process that was used for marine shorelines; please provide clarification. Give the potential role that certain land uses can have in contributing to stressors that will result in degradation of ecological functions, we request designation of marine shorelines with restoration designations of B and D as Natural or Conservancy.	A section has been added to the Shoreline Master Plan description of shoreline designation to clarify how the shoreline characterization and restoration plan ratings have been used. Marine shorelines with restoration designations of B within the Maury Island Aquatic Reserve are now designated Natural, to recognize the uniqueness and importance of the reserve.	168
Why are areas waterward of the ordinary high water mark and in a municipally owned watershed not included in the Aquatic designation? Are they in the Natural Resource designation?	This policy has been revised so that the waterward area of municipal watersheds is included in the Aquatic designation.	164
Residential Designation		
Building height 35 ft max - no mention of shoreline residential, which should be included. Residential accessory structures are limited to 8 ft in height? Is this new?	Residential shoreline was inadvertently omitted from the list of designations with the 35 foot maximum building height limitation and will be added. The 8 foot accessory structures height was carried over from current shoreline regulations and is not a new provision.	118
High Intensity Designation		
The Vashon-Maury Island Portage area has been designated as high intensity. There is significant need for restoration in this area. Please consider adopting policies that will require environmental cleanup and restoration and policies that will assure that future uses are compatible with existing uses and have adequate infrastructure.	A statement has been added to the High Intensity management policies to address this comment.	168
Conservancy Designation		
Conservancy designation for Lake Margaret is confusing - the area is all residential.	Conservancy does not preclude construction of single family residences and is not incompatible with residential areas. It does afford greater environmental protection along those shorelines that have less altered ecological processes or that are located in hazardous zones such as FEMA floodways or severe channel migration zones.	55
King County states that uses in the Conservancy designation should be of a nonpermanent nature. Why then is King County proposing to include residential areas in this designation?	This comment misinterprets the Conservancy policy; the County is proposing that uses meet one or both of the conditions (uses that sustain physical and biological resources OR uses of a nonpermanent nature). The policy has been clarified. Single family uses are to be limited and regulated such that they do sustain the shoreline area's physical and biological resources.	164

Summary of Comment	King County Response	Commentor(s)
Urban Designation		
<p>The distinction between urban and rural for setbacks is too simplistic. Some rural areas like Quartermaster Harbor and small lakes have 50 - 60 foot wide lots. It seems like the urban category would be more appropriate.</p>	<p>The urban designation allows for more dense development into the future than does rural, based on zoning regulations. Some smaller parcels may be grandfathered into rurally zoned areas because they were platted before the current zoning came into effect. For those smaller parcels located in the Rural Designation, there are several avenues that can be pursued to deal with the larger required buffers, such as buffer averaging, alterations exceptions, and adjacent ownership provisions.</p>	25
Natural Designation		
<p>Include medium-high rated marine reaches and preserved public lands to the Natural designation.</p>	<p>Some additional shoreline reaches in the Maury Island Aquatic Reserve have been redesignated as Natural. All King County-owned lands that were purchased for ecological protection are now also included in the Natural designation.</p>	34
<p>Natural marine shoreline designation criteria should be revised by deleting "that has a restoration plan rating of A, and the shoreline reach is at least five hundred feet along the ordinary high water mark."</p>	<p>This would cause all marine shorelines to be designated Natural. Given the criteria set forth by the state (WAC 173-26-211 (5) (a) (iii)) this would not be consistent with the existing land use around the islands, and will not be added to the designation criteria.</p>	176
<p>Allow utilities and services for single family residential uses to be sited in Natural shorelines; add policy language to this effect.</p>	<p>King County Code 21A.24.045 addresses the siting of utilities and public service facilities along shorelines; these standards apply in along Natural shorelines.</p>	137
<p>Natural designation criteria in should be amended to include all of the criteria in WAC 173-11-211 (5)(iii).</p>	<p>Shorelines that are considered to represent ecosystems and geologic types that are of particular scientific and educational interest are represented by those shorelines described by S-528.</p>	172
<p>The Natural shoreline environment management policies should be amended to add the following prohibited uses within the Natural Shoreline: industrial or commercial docks or piers, or water related uses.</p>	<p>Docks and piers that are used for industry or commercial uses would be prohibited in the Natural designation, as the policies are written.</p>	172

Summary of Comment	King County Response	Commentor(s)
<p>There is a recommendation is to create additional restrictions for residential development in Natural Shoreline designation. Suggestions include prohibiting further subdivision, limiting size of home and impervious areas, requiring low impact designs, and inserting a policy that promotes buyout, property easements, or tax incentives for privately-owned properties with important fish within the Natural designation where important fish and wildlife habitat occurs and where proposed development intensity is moderate to high.</p>	<p>The draft Shoreline Master Program includes policy S-500 that prohibits any use that that would substantially degrade the ecological processes and functions or the natural character of the shoreline area. To address situations where this policy may be at conflict with property rights, such as where high density of small parcels exists in otherwise low development environment and where those parcels coincide with important fish and wildlife habitat, a new policy was added to recommend that the County use economic incentives, easements or buyouts to acquire or protect the habitat values of those lands.</p>	171
<p>King County proposes to allow single family residential as a conditional use in the Natural designation if the use is consistent with the purpose of the designation. The purpose is to protect those shoreline areas that are relatively free of human influence and of high ecological quality.</p>	<p>Allowing single family residential as conditional uses in the Natural designation is consistent with the State's guidance (WAC 173-26-211).</p>	164
<p>What does 'very low intensity' mean when referring to agricultural uses within the Natural designation?</p>	<p>Allowing agricultural uses of a very low intensity nature within the Natural shoreline designation is consistent with the State's shoreline guidance. The intent of this policy has been clarified. <u>Examples of agricultural uses of a very low intensity may include maintaining small vegetable gardens or keeping one farm animal on a property two acres or greater in size (and following livestock management rules).</u></p>	164
<p>Regulations of resource land uses should be amended to prohibit all uses within the Natural environment, except, commercial forestry with a conditional use permit and agricultural uses of very low intensity.</p>	<p>Consistent with State guidance, King County will allow more uses than only commercial forestry and low intensity agriculture in the Natural designation (WAC 173-26-211(5)(a)).</p>	172
<p>All marine shorelines of Vashon-Maury Islands should be designated Natural.</p>	<p>There are several existing, dense residential housing developments along this shoreline where a natural designation would not be appropriate given the State's designation criteria (WAC 173-26-211(5)).</p>	176
<p>The entire eastern shore of Maury Island should be designated natural.</p>	<p>A large portion of the shoreline is zoned for mining. Mining is not an allowed use in an area designated as natural. Also, there are several fairly dense residential housing developments along this shoreline where a natural designation would not be appropriate given the state criteria (WAC 173-26-211 (5)).</p>	172
<p>The Natural designation criteria should be amended to include restoration plan rating of B.</p>	<p>This criterion was added to the natural designation for areas within the Maury Island Aquatic Reserve to create greater protection for this important area. However zoning such as mining still supersedes the natural designation.</p>	172

Summary of Comment	King County Response	Commentor(s)
<p>KC should add a fifth criteria to the “natural” designation criteria, specifically, “A marine shoreline with a shoreline reach of at least five hundred feet and located adjacent to the Maury Island Aquatic Reserve.”</p>	<p>This comment seems to imply that all the uplands within the reserve should be designated natural. This is not consistent with the existing land use within various portions of the reserve, and will not be added to the designation criteria. Most of inner Quartermaster Harbor’s shoreline is heavily armored. There are two marinas. The riparian condition throughout much of the reserve is greatly lacking. There are fairly dense residential developments, bordering on urban densities that predate the SMA. The natural designation is intended to protect those areas that are currently of high quality, not areas of dense development or areas where mining is allowed, according to the state criteria (WAC 173-26-211 (5)(a)(iii)).</p>	<p>172</p>
<p>From Piner Point to Point Robinson should be designated Natural Shoreline Environment.</p>	<p>Due to the existing land use, designating all lands along this stretch of shorelines Natural is not consistent with the criteria set forth by the state (WAC 173-26-211 (5) (a) (iii)). There are fairly dense residential developments, bordering on urban densities that predate the SMA in different portions of this shoreline. Mining zoning is present along portions of this shoreline and it is not an allowed use in areas designated Natural. The Natural designation is intended to protect those areas that are currently of high quality, not areas of dense development or areas where mining is allowed, according to the state criteria (WAC 173-26-211 (5)(a)(iii)).</p>	<p>176</p>
<p>Maury Island Aquatic Reserve</p>		
<p>Do not follow the State’s Maury Island Aquatic Reserve Management Plan; do not allow mining or aquaculture in the Reserve.</p>	<p>Proposed permitted uses within the shoreline designations were drafted considering the recommendations of the Maury Island Aquatic Reserve management plan. The State’s recommended guidance for aquaculture is being further evaluated. Marine shorelines with restoration designations of B within the Reserve are now designated Natural, to further recognize the uniqueness and importance of the reserve.</p>	<p>123</p>
<p>The existing mining operation on Maury Island has been designated as Conservancy. We do not support dock expansion for industrial uses in the Maury Island Aquatic Reserve, as this intensity of use in incompatible with the need to protect the reserve’s unique shoreline resources. We request that you include policies and regulations that will prohibit expansion of docks for industrial uses in the Maury Island Aquatic Reserve.</p>	<p>Areas zoned for mining or agriculture are now contained in their own designation of Resource, and are no longer in the Conservancy designation. The proposed draft Shoreline Master Program essentially maintains the way that mining is addressed under the existing Shoreline Master Program. Marine shorelines with restoration designations of B within the Maury Island Aquatic Reserve are now designated Natural, to recognize the uniqueness and importance of the reserve. Proposed permitted uses within the shoreline designations were drafted considering the recommendations of the Reserve management plan.</p>	<p>168, 9, 92</p>

Summary of Comment	King County Response	Commentor(s)
All the uplands within the Maury Island Aquatic Reserve should be designated natural.	This is not consistent with the existing land use within various portions of the reserve, and will not be added to the designation criteria. Most of inner Quartermaster Harbor's shoreline is heavily armored. There are two marinas. The riparian condition throughout much of the reserve is greatly lacking. There are fairly dense residential developments, bordering on urban densities that predate the Shoreline Management Act. The natural designation is intended to protect those areas that are currently of high quality, not areas of dense development or areas where mining is allowed, according to the state criteria (WAC 173-26-211 (5)(a)(iii)).	176, 196
The currently proposed designations may not be a good fit for proper management of the unique resources of the Maury Island Aquatic Reserve. One option that you may want to consider is similar to the adopted Whatcom County Shoreline Master Program, which establishes a separate environmental designation for the Cherry Point Aquatic Reserve.	The Maury Island Aquatic Reserve has a wide range of existing land uses, unlike that of the Cherry Point Aquatic Reserve. The Washington State Department of Natural Resources recognized this by identifying three distinct management areas for the Maury Island Aquatic Reserve. King County now proposes to designate marine shorelines with restoration designations of B within the Maury Island Aquatic Reserve as Natural, to recognize the uniqueness and importance of the reserve. Proposed permitted uses within the shoreline designations were revised to take into consideration the recommendations of the Reserve management plan.	168
We are concerned about the reliance on upland conditions in designations. Upland development, if not properly managed, could result in significant biological degradation. Given that current rural zoning allows industrial and commercial uses, Rural is not an appropriate designation for much of the Vashon-Maury Island shoreline.	The State requires that local governments consider existing use pattern and the biological and physical character when designating shorelines (WAC 173-26-211(2)). Proposed designations on Vashon-Maury Island reflect existing conditions, ranging from Natural to High Intensity. Shoreline designations will not alter the zoning for the upland areas. The shoreline designations do not include management policies or development standards that are inconsistent with current zoning.	168
Mining		
Do not allow mining on Maury Island.	The proposed draft Shoreline Master Program essentially maintains the way that mining is addressed under the existing King County Shoreline Master Program, Comprehensive Plan and zoning code. King County's decision to allow mining along the shoreline is consistent with WA Department of Ecology shoreline management guidelines, as long as mining is conducted in a manner consistent with the environment policies and provisions of WAC 173-26-241(h) and when located consistent with mineral resource lands designation criteria pursuant to RCW 36.70A.170 and WAC 365-190-070.	2, 14, 26, 28, 31, 42, 45, 48, 57, 68, 72, 74, 83, 84, 93, 94, 114, 127, 141, 146, 147, 153, 156, 161

Summary of Comment	King County Response	Commentor(s)
<p>Do not allow mining in the Conservancy designation.</p>	<p>The WA Department of Ecology's guidelines recognize that mining may be allowed in a conservancy environment when an area has been designated as a mineral resource land under the Growth Management Act. However, to avoid confusion, King County has decided to separate areas that are conserved for their natural resources, e.g. agricultural and mineral resource lands, from those areas that are conserved for their ecological or public safety values, e.g. flood hazard areas and high value shorelines.</p> <p>Shoreline reaches zoned for agriculture and mining have been removed from the Conservancy designation, and combined to create a Resource designation. The draft Shoreline Master Program does not propose any changes to permitted uses in the agriculture and mining zones.</p> <p>Any development activity along the shoreline, even single family residential development, has the potential for adverse impacts on the shoreline environment. King County is committed to adopting appropriate regulations to ensure that any development results in no net loss of shoreline functions and values.</p>	<p>21, 36, 49, 59, 71, 95, 131, 129, 108, 174, 172, 176</p>

Summary of Comment	King County Response	Commentor(s)
Do not allow mining in the Conservancy designation and protect marine ecology on Vashon-Maury Island.	<p>The WA Department of Ecology's guidelines recognize that mining may be allowed in a conservancy environment when an area has been designated as a mineral resource land under the Growth Management Act. However, to avoid confusion, King County has decided to separate areas that are conserved for their natural resources, e.g. agricultural and mineral resource lands, from those areas that are conserved for their ecological or public safety values, e.g. flood hazard areas and high value shorelines.</p> <p>Shoreline reaches zoned for agriculture and mining have been removed from the Conservancy designation, and combined to create a Resource designation. The draft Shoreline Master Program does not propose any changes to permitted uses in the agriculture and mining zones.</p> <p>Any development activity along the shoreline, even single family residential development, has the potential for adverse impacts on the shoreline environment. King County is committed to adopting appropriate regulations to ensure that any development results in no net loss of shoreline functions and values.</p>	3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 15, 16, 17, 19, 20, 23, 30, 31, 32, 33, 35, 37, 38, 40, 41, 43, 44, 45, 47, 50, 51, 52, 53, 54, 56, 57, 60, 61, 62, 64, 65, 66, 67, 70, 73, 75, 76, 77, 79, 80, 82, 85, 86, 87, 88, 89, 90, 97, 98, 100, 101, 102, 104, 105, 106, 108, 109, 110, 111, 112, 113, 115, 116, 117, 119, 120, 121, 124, 125, 126, 127, 128, 129, 130, 132, 133, 134, 135, 136, 137, 138, 140, 142, 143, 144, 145, 148, 149, 150, 151, 152, 154, 155, 157, 158, 160, 161, 162
King County should not allow industrial or commercial uses, including but not limited to industrial or commercial docks or piers, within the Conservancy Environment.	Most industrial and commercial uses would be prohibited within the Conservancy environment; see the revised policy S-519.	172, 176
King County should not allow "water related" activities within the Conservancy Environment.	The comment appears to be concerned with mining activities in the Conservancy designation. Areas zoned mining or agriculture are now contained in the Resource designation and are no longer in Conservancy. King County will continue to allow some water-related uses in the Conservancy designation.	172
Mining and mine related uses should not be allowed within the Natural environment.	New mining would not be allowed in the natural environment.	172

Summary of Comment	King County Response	Commentor(s)
<p>In Conservancy designation, we are concerned that mining and agriculture may be incompatible with residential and that mining and certain agriculture and residential developments are sufficiently intensive such that significant impacts will occur.</p>	<p>A new designation has been added specifically for areas dominated by agriculture and mining uses; these areas are now contained in the Resource designation.</p> <p>The proposed draft Shoreline Master Program essentially maintains the way that mining and agriculture are addressed under the existing Shoreline Master Program.</p>	171
<p>The proposed plan appears to mandate mining in the conservancy environment. This is contrary to the purpose of the conservancy environment and to the how King County currently treats the conservancy environment in its existing shoreline program.</p>	<p>The shoreline designations have been modified to remove mining as a permitted activity in the conservancy environment. However, the comment is incorrect about the current shoreline program. Mining is an allowed activity within the conservancy environment under King County's existing shoreline program.</p>	196
Residential		
<p>Add "water" to the list of utilities that are allowed to serve residential development.</p>	<p>This change has been made.</p>	165
Dredging		
<p>The Plan should clearly state that dredging should only be allowed if there is no net loss of ecological functions.</p>	<p>A statement has been added to the dredging section of the Shoreline Modifications policies to address this comment.</p>	168
Docks and Piers		
<p>Lake Margaret has only planted trout - no salmon -so the dock light rules should not apply.</p>	<p>Artificial light at night affects not only anadromous fish species, but alters the daily vertical migration patterns of zooplankton and other aquatic creatures, as well as giving competitive advantages to visual predators such as bass. This upsets ecological relationships, which can cause unexpected or unwelcome changes in lake ecology, such as algal blooms that are unchecked by zooplankton.</p>	81
<p>Density requirements for docks do not make sense on Lake Margaret - most lots are about 50 feet wide. Light rules for docks on Lake Margaret do not make sense - it's a stocked trout lake, and WDFW planted the bass - most fishermen didn't want them.</p>	<p>Changes in current dock regulations are under consideration and should be addressed in the next draft of the program. Artificial light at night affects the daily vertical migration patterns of zooplankton and other aquatic creatures, as well as giving competitive advantages to visual predators such as bass, which have been repeatedly introduced to County lakes by some fisherman. Light at night upsets routine ecological relationships, which can cause unexpected or unwelcome changes in lake ecology, such as algal blooms that are unchecked by zooplankton.</p>	55

Summary of Comment	King County Response	Commentor(s)
Ease up dock and bulkhead maintenance and expansion standards for single family residences on lake shorelines.	In general, King County is proposing dock and bulkhead standards that are consistent with State and Federal guidelines, including specifications of the United States Army Corps of Engineers General Permit RGP-3, the United States Army Corps of Engineers General Permit RGP-6, and Washington Department of Ecology shoreline management guidelines. We do not anticipate changes to relevant existing King County critical areas regulations or public rule 25-16 (Shoreline Master Program: Repair or Replacement of Shoreline Protection, Piers, Moorage Facilities, or Launching Facilities) at this time. Subject to certain conditions, existing bulkheads that protect single family residences may be replaced.	96, 22
Can docks be permanent under proposed regulations? Why do we have the light regulations for docks on non-anadromous lakes? Why are forest practices not allowed in high intensity or shoreline residential? Can you take out a tree?	Some docks will be allowed to be permanent under proposed regulations. Artificial light at night affects not only anadromous fish species, but alters the daily vertical migration patterns of zooplankton and other aquatic creatures, as well as giving competitive advantages to visual predators such as bass. This upsets ecological relationships, which can cause unexpected or unwelcome changes in lake ecology, such as algal blooms that are unchecked by zooplankton. Forest practices are not allowed due to zoning regulations rather than being limited by Shoreline Master Program regulations. Removal of a tree is not considered a forest practice and is allowed in appropriate circumstances.	118
Allow single family residential uses on lakes - including those on large lots that could accommodate 4 units if subdivided - to build docks. A dock would have less impact on the shoreline than foot traffic on the bank.	In the High Intensity, Residential, Rural, Natural and Conservancy environments, each single family detached residential parcel would be allowed to have one dock (or pier, moorage, float or launching facility) if the property owner can demonstrate that there is no other option. In the Conservancy environment, a dock or pier must be located at least 250 feet from another dock or pier. A dock may be prohibited if a wetland would be affected. A new dock must meet County construction standards.	55

Summary of Comment	King County Response	Commentor(s)
Residential dock standards should be reviewed.	<p>King County is proposing to update critical areas regulations that only allow docks on lakes and other water bodies. According to proposed changes, new docks generally would be permitted on rural lakes and other shorelines in the rural area (one dock per single family residence) if it could be demonstrated that there are no other options. Joint use docks would be preferred. There would be a minimum spacing requirement for docks on Conservancy shorelines and a conditional use permit required on Natural and Resource shorelines. Applicants would continue to be required to comply with critical areas dock repair, maintenance and design standards (King County Code 21A.24.045).</p> <p>The shoreline master program update will not be used as an enforcement mechanism. Some lake shore property owners received a flyer in early 2007 that suggested that King County will be using the information developed as part of this shoreline program update to take enforcement action against those who may not have permits for their existing docks. Some property owners expressed the concern that they are not sure when their dock was constructed or whether it had permits. King County reviewed its electronic permit data to identify where development has taken place in the shoreline area for informational purposes only. This data is not comprehensive and does not include information prior to 1990.</p>	175, 177, 178, 179, 183, 184, 185, 186, 187, 189, 194
Lake Marcel (Private, rural lake) - I would like to see the county ease the regulations of docks and floats on this lake. I would like to see the control / regulation for docks and floats on this lake to be put into the hands of the Lake Marcel Community.	King County's proposed shoreline regulations will allow docks and piers on rural lakes under generally the same conditions as they are allowed under the existing shoreline program. There is a new preference for joint use docks, and there are new limits on the minimum spacing of docks on Conservancy shorelines. More information on existing and proposed dock and pier standards can be found at www.kingcounty.gov/shorelines . Please note that King County is required by the State to manage shorelines on rural lakes that are 20 acres or greater in size.	180, 192
Regarding avoidance and minimization of toxic material use, delete "to the maximum extent practicable" and replace with "...must be designed to avoid, then minimize and mitigate impacts to ecological functions." Also delete the last sentence and prohibit treated wood products or have proponent justify why alternatives wouldn't work.	Language to avoid and minimize use of toxic materials has been added to Policy S-789.	171
A new policy should be added that explicitly states that shared dock and pier facilities will be given preferred and special consideration, such as streamlined permit process and lower permit fees, for single-family residents who share facilities.	Policy S-607 was added to this effect.	171

Summary of Comment	King County Response	Commentor(s)
King County proposes to modify shoreline regulations and critical areas regulations to allow new rural residential docks and piers in shoreline areas that have been legally altered in the past and provide less significant habitat. Would building permits be required? How will the letter of shoreline exemption be adequate to apply standards and mitigation to ensure fish friendly dock and pier construction? How would the County ensure no net loss of ecological functions on marine shorelines designated Conservancy or Rural where no conditional use permit would be required?	Building permits for docks and piers are required. As docks and piers are subject to the critical areas regulations, any impacts from new docks and piers must be mitigated such that there is no net loss of ecological functions.	168
Docks and piers should not be allowed in the Natural Environment.	Docks and piers are only allowed for water dependent uses and require a shoreline conditional use permit. The conditional use permit will allow additional conditions to ensure that the character of the natural shoreline can be maintained.	196
Stormwater and Low Impact Development		
The draft shoreline development regulations re impervious surface should clarify that the limits only apply to the portion of a single lot that lies within shoreline jurisdiction.	The impervious surface standard does apply to the full lot or parcel. This is an existing standard in King County Code Chapter 21A.12; the standard is being incorporated into the draft Shoreline Master Program.	91
Concerned about stormwater impacts on Lake Alice.	King County will continue to implement stormwater control regulations (King County Code Title 9), updated in 2004, on shorelines of the state. To learn about King County stormwater regulations, please see http://www.metrokc.gov/ddes/cao/ .	27
Use innovative control stormwater and non-point pollution to improve likelihood of success.	The Shoreline Master Program will be implemented in the context of King County's state-of-the-art stormwater and other upslope, upstream non-point source pollution controls, including an array of land use and stormwater regulations, best management practices and CIPs, and stewardship program. These programs stem from historic (1980s and 1990s) basin planning and other systematic problem-solving plans that were conducted in large due in recognition of the need to address the causes rather than symptoms of land use impacts, thereby improving likelihood of success and avoiding unintended consequences.	170
All permits or exemptions should require using appropriate strategies as described in "Low Impact Development: Technical Guidance Manual for Puget sound" by the Puget Sound Action Team, 2005. LID strategies should be required for single family homes as well as developers and public property.	King County's low impact development standards and requirements are contained in the 2005 Surface Water Design Manual. Appendix C, containing best management practice details is available online at: http://dnr.metrokc.gov/wlr/dss/swdmapdx.htm#appndxc	176

Summary of Comment	King County Response	Commentor(s)
Permits		
Owner's property almost entirely within buffer on Raging River. Wants to create an environmental learning center constructed of treehouses of 250 sq. ft. size.	Specific proposals must be reviewed by DDES staff in order to make a decision on whether a permit could be granted.	103
If DDES granted a permit, could the shorelines people come back and say no?	The Shorelines Master Program is part of the permit process, and those regulations are taken into consideration before the issuance of a permit. All County regulations are considered concurrently, and no conflicts will occur after a permit is issued.	55
Do residential applications have to prove that we haven't harmed ecological function, or is it more of a policy statement?	The mitigation required for permitting construction along the shorelines must provide for no net loss of ecological function under the State guidelines for the Shoreline Master Programs. The choice of mitigation strategy is not placed on the permittee.	118
Why isn't a conditional use permit required for mining within the entire channel migration zone?	King County has mapped both moderate and severe channel migration zones. King County's severe channel migration zone is consistent with the WAC definition of channel migration zone, and a conditional use permit is required for mining in that area. The County also regulates areas beyond the severe channel migration zone (within the moderate channel migration zone).	164
It would be helpful if all clearing, grading, construction, etc. required notices be posted while work is in progress. Such notices should be where passersby can read them from public access. Both the owner and the contractor should be made responsible	King County will not require that a notice be posted on site for all clearing, grading or construction activities in the shoreline jurisdiction for logistical reasons. Current permit information is available to the public at the King County Department of Development and Environmental Services.	176
Stream line and minimize the shoreline permit process.	The permit processes for shorelines and critical areas have been simplified, streamlined and coordinated with other State and Federal permit processes as much as possible.	191, 195
Shoreline modification associated with homes is a major cause of nearshore and marine riparian degradation. From the proliferation of shoreline permits issued by King County DDES (shown on the Land Use Patterns Map), especially those around Vashon.	King County will comply with the Shoreline Management Act and associated guidelines in reviewing and approving shoreline permits. King County is required by law to allow reasonable use of private property; property owners may apply for a shoreline variance if regulations prevent reasonable use of their property.	176
Suggest procedures for hiring geotechnical consultants to ensure that reports be as unbiased as possible	Geotechnical reports must be prepared by geotechnical engineers, per current King County critical areas regulations. Geotechnical engineers, by definition, must be licensed and have at least 4 years of experience. The policy was not revised as this issue is covered in existing County regulations.	171

Summary of Comment	King County Response	Commentor(s)
Proposed regulations state that a shoreline conditional use permit is needed for a dock or pier in a Natural environment. If the use is water dependent, a conditional use permit is not required. All docks and piers should be prohibited within Natural. If not all, than at least industrial or commercial docks (WAC 173-26-211 (5)(a)(ii)(B).	The draft regulation has been revised so that docks and piers associated with water-dependent resource uses would not be allowed in the Natural designation. The conditional use permit process would involve adequate review of proposed docks and piers, in general.	172
King County should require a shoreline conditional use permit for the construction of shoreline stabilization along Resource, Conservancy and Rural shorelines, in addition to Forestry and Natural shorelines.	Critical areas regulations address shoreline stabilization and require mitigation to ensure no net loss of ecological functions. Requiring a shoreline conditional use permit in addition would not add any value to the regulation of shoreline stabilization.	168
How with the county ensure that design standards and permit issuance criteria along marine shorelines consider cumulative impacts of bulkheads and shoreline stabilization, particularly in critical saltwater habitats and the Aquatic Reserve?	A cumulative impacts analysis has been completed, including analysis of shoreline design standards and permit requirements. That draft analysis concludes that there would be no net loss of ecological functions under the proposed Shoreline Master Program. There will also be an ongoing opportunity for the public to comment on or appeal shoreline permit decisions – concerning cumulative impacts – as the Program is implemented.	168
Restoration		
Identify existing development intensity and how restoration will be applied.	A new policy clarifying types of development and protection and restoration has been added to the Program.	171
Public Access		
Avoid policies that limit use of Green River by citizens, especially at intersection of the Green Valley Road and Highway 218. Also should provide garbage and recycling containers.	Policies S-302 – S-308 of the draft Shoreline Master Program state that the county should protect and, when possible, expand recreational opportunities and evaluate opportunities to acquire shoreline property from willing landowners in order to expand recreational opportunities. To the extent available budget is available, King County Parks provides containers for garbage.	181
Why is the public access requirement limited to commercial development on public land? How is public access on private land addressed?	Policy S-722 states that nonwater-oriented commercial uses [on public or private land] are prohibited in the shoreline zone unless they meet defined criteria, including providing public access.	164
Aquaculture		
Recommend additional polices that recognize the importance, preferred and water-dependant nature of aquaculture. Suggest polices from Whatcom County's February, 27, 2007 Draft Shoreline Master Program.	Text was modified to include selected policies in Whatcom County's February, 27, 2007 draft Shoreline Master Program. Changes include new policies that reinforce aquaculture as a preferred use, require aquaculture to avoid cumulative impacts, limits and that potentially deny shoreline uses that may impact existing legally permitted aquaculture, and prioritizes forms of aquaculture with lower inherent risk to the environment. Additional text was added, to ensure that public access goals are not compromised by aquaculture.	171

Summary of Comment	King County Response	Commentor(s)
Parking		
<p>Revise language to a) prohibit parking facilities from the shoreline zone unless alternatives analysis shows no other feasible alternative outside the 200-foot zone, b) if no other feasible alternative require low impact designs such as porous concrete and vegetated swales to limit stormwater run-off and c) for unavoidable impacts, require wildlife habitat mitigation by restoring riparian habitat elsewhere on or off-site.</p>	<p>Text was added to specify that parking facilities should be located outside of the shoreline zone unless an alternatives analysis demonstrates no feasible alternative and that low impact designs be used.</p>	171
Trails		
<p>While trails that provide access to the shoreline are appropriate, please do not allow trails or fill associated with trails to be placed parallel to the intertidal zone on Vashon-Maury Island; development of public access should ensure adequate area outside of the intertidal zone for such trails.</p>	<p>The policies and regulations regarding private trails have been clarified so that the development of new trails parallel to the shoreline is minimized.</p>	168
Shoreline Stabilization		
<p>In Quartermaster Harbor, feeder bluffs are highly valued by DNR for protective purchase because they contribute sediments. However, DDES seems to place a high priority on preventing erosion. It is puzzling that there is this difference in priority.</p>	<p>Feeder bluffs are highly valued since sediments eroded from bluffs are a primary source for maintaining beaches. The shorelines designations and regulations try to take this process into account when issuing permits for development on privately owned parcels. Proposed regulations will allow hard armoring only as a last resort when permitting parcel development in areas where protection is needed. However, structures already built are afforded protection under grandfathering clauses.</p>	25
<p>Cargo container ship wakes at high tide are affecting the shoreline. You get very high waves, about 3.5 feet tall, causing unnatural erosion. You would have to contemplate the effects of these waves on the shoreline.</p>	<p>Wave effects from the navigational channel were evaluated in the technical alteration analysis for marine shorelines, which was used in setting shoreline designations. The analytical methods are detailed in Technical Appendix E of the Master Plan.</p>	39
<p>Need advice and possible County approvals for repairing previous shoreline flood damage.</p>	<p>The King County Department of Natural Resources and Parks provides bank stabilization assistance when there is an established levee or revetment on the bank; bank stabilization is otherwise the responsibility of the property owner and a permit may be required. The Department of Development and Environmental Services can provide assistance and clarify what information is required for a permit, if one is necessary.</p>	18

Summary of Comment	King County Response	Commentor(s)
<p>Given their environmental impacts, do not allow new bulkheads on marine shorelines.</p>	<p>King County's existing shoreline regulations limit construction of new shoreline stabilization structures, including bulkheads. Shoreline stabilization is only allowed for the purpose of protecting existing, legally established structures and public improvements. The county requires an applicant for shoreline stabilization to first consider non-structural alternatives and demonstrate whether they are feasible. The location and height limits of bulkheads are also defined. King County rules also require the applicant to demonstrate that wave or current action is the primary agent of erosion; other causes of erosion must be corrected prior to approval for a shoreline stabilization structure. The proposed Shoreline Program would maintain these requirements, and incorporate additional measures to protect shoreline habitat. A geotechnical report would be required to evaluate erosion at the site of proposed shoreline stabilization, and proposals for new shoreline stabilization on the marine shorelines would be analyzed to avoid feeder bluffs, salmonid and forage fish habitat, and eelgrass beds.</p>	<p>9</p>
<p>Waterfront property owners should be required to plant buffers of native plants adjacent to the beach, with berms and swales and rainwater catchment / rain gardens that keep the water on site. Softer alternatives to bulkheads should be required where</p>	<p>King County's proposed Shoreline Master Program changes would maintain the currently existing policies on shoreline stabilization, but would incorporate additional measures to protect habitat. New bank stabilization projects would be required to comply with the Washington State Integrated Streambank Protection Guidelines (WDFW 2003). Biotechnical slope stabilization measures would be required for new revetments, armoring, or other measures for stabilizing river banks. Other causes, such as poor drainage or improper vegetation management, must be corrected prior to approval for a shoreline stabilization structure. A geotechnical study would be required to evaluate the processes acting both at and near the site of proposed bank stabilization. Project proposals for new shoreline stabilization on the marine shorelines of Vashon Island would be analyzed to avoid placement of new bank armor either on or adjacent to feeder bluffs, salmonid and forage fish habitat, or eelgrass beds.</p>	<p>176</p>

Summary of Comment	King County Response	Commentor(s)
Soft shoreline armoring is not effective; instead encourage bulkhead removal and increase setbacks. Provide technical and financial incentive programs to encourage such actions. How many miles of Vashon shoreline are designated Natural?	Some literature suggests that soft armoring techniques are effective in preventing both damage to structures and to ecological functions along shorelines if carried out properly (Gerstel, W.J. and J.F. Brown. 2006. Alternative Shoreline Stabilization Evaluation Project, final report. Puget Sound Action Team, Olympia Wa). King County does encourage existing bulkhead removal where feasible, but does not currently provide incentives. The Shoreline Master Program is regulatory in nature and is not designed to provide monetary or technical incentives. There are currently 14.5 miles in the Natural Designation along Vashon shorelines.	34
If it is shown that shoreline stabilization is needed, softer alternatives should be used if feasible.	The shoreline modifications policies were revised to encourage soft shoreline stabilization.	176
Require feasibility assessment of non-structural shoreline stabilization solutions before structural designs are submitted	Not done as not part of the Plan; critical areas regulations address this issue.	171
Recommend that applicant locate bulkheads above ordinary high water mark even if connecting to an existing bulkhead	Not done as not part of the Plan; critical areas regulations address this issue.	171
Recommends bulkhead heights be determined on a site-specific basis and minimized to the greatest extent possible	Not done as not part of the Plan; critical areas regulations address this issue.	171
Allow treated wood products only after determination that no other products are feasible	Not done as not part of the Plan; critical areas regulations address this issue.	171
Prohibit new structures in marine environment with potential to alter longshore drift.	New text on avoidance and low impact alternatives has been added to policy S-796.	171
Clarify whether shoreline stabilization (including bulkheads) is allowed along feeder bluffs, salmonid and forage fish habitat and eelgrass beds in Resource and Natural Shorelines.	Only in limited circumstances when it is necessary to prevent damage to public infrastructure and existing structures, is shoreline stabilization allowed – regardless of the shoreline designation (see S-781 and S-782).	164
The policies suggest that stronger impacts avoidance language because of the high value but limited number of feeder bluffs. Suggest, discouraging new or redevelopment of properties on feeder bluffs, a statement that King County will make special effort to investigate transfer of development rights, easements, tax incentives and other non-regulatory methods to discourage new development on feeder bluffs, and include language that a wider buffer than the standard may be required in these areas	Policy S-781 strengthened to protect feeder bluffs and new policy added (S-782) to specify that feeder bluffs should be prioritized for protection using acquisition, easement, transfer of development rights and other programs.	171

Summary of Comment	King County Response	Commentor(s)
<p>King County proposes to allow new shoreline stabilization and flood control works to be built if there is a documented need, and if mitigation is provided. This policy must be consistent with WAC 173-26-231, and it should apply in the Conservancy, Rural, High Intensity and Shoreline Residential designations.</p>	<p>King County's proposed shoreline stabilization policies are consistent with State guidelines. In High Intensity, Residential, Rural, Conservancy and Resource Shorelines, replacement of shoreline stabilization is allowed only to replace existing protection. New shoreline stabilization must demonstrate the need to protect an existing structure and mitigation must be provided.</p>	<p>168</p>
<p>A policy addressing groins should be added to the Plan that prohibits residential groins that will alter longshore drift processes in the marine environment. Alternatively, please consider the following Whatcom County SMP language: "Groins are prohibited except as a component of a professionally designed community or public beach management program that encompasses an entire drift sector or reach for which alternatives are infeasible, or where installed to protect or restore shoreline biological functions or processes."</p>	<p>A policy that further addresses groins was added to the Plan.</p>	<p>168</p>
<p>Do you have any regulations or best practices for how to stabilize slopes and prevent erosion? I see a lot of slides and erosion all around the island.</p>	<p>Slides along the shorelines, in particular from feeder bluffs, are part of the natural process of renewing beach sediments that erode over time. Therefore, it is important to leave cliffs and banks to erode and slide when it does not threaten structures, as well as to make sure that new structures are not built in the way of harm from naturally occurring landslides. The policies and regulations of the Shoreline Master Program include some methods that can be further investigated. Some information on environmentally sound ways of preventing slides can be found at: http://www.ecy.wa.gov/programs/sea/pubs/93-31/intro.html and http://www.ecy.wa.gov/programs/sea/pubs/95-107/intro.html and http://www.ecy.wa.gov/programs/sea/pubs/93-30/index.html</p>	<p>57</p>
<p>County's actions related to downstream levees will cause flooding in other areas.</p>	<p>More information is needed regarding geographic location to address this comment.</p>	<p>167</p>

Summary of Comment	King County Response	Commentor(s)
<p>How would King County encourage new development along Vashon and Maury Islands that may be impacted by sea-level rise to be set-back a sufficient distance to avoid the need for shoreline protection during the expected life of the development?</p>	<p>As discussed in the Technical Appendix (Appendix E to the Shoreline Master Program), the sea level could rise approximately 3 feet by the year 2100 in Puget Sound. New developments would be required to comply with existing critical areas protection requirements, including a 165-foot buffer along the marine shoreline. King County will continue to monitor the latest science on climate change and its potential effects on the marine shoreline. Policies S-770 requires the County to notify developers where sea-level rise should be a consideration and encourage the set-back of development, and S-777 encourages any replacement of shoreline stabilization outside of the 100-year floodplain (equivalent to a 2 foot sea-level rise).</p>	<p>164</p>
<p>There must be allowance for situations where properties need to be protected with higher and/or shaped bulkheads to deal with exceptionally high water and waves along marine shorelines. The wakes from large ships produce swells and breaking waves whi</p>	<p>King County will continue to evaluate the need for higher bulkheads due to ship traffic and sea level rise, both in reviewing proposed new or expanded bulkheads and as we finalize the Shoreline Master Program update.</p>	<p>63</p>
<p>Critical Areas Protection</p>		
<p>In one place, it says that non-conforming structures can only be rebuilt if they meet current regs. Down the page, it says that they can be expanded up to 1000 square feet. Is this inconsistent? You should make it clearer.</p>	<p>King County policy states that non-conforming structures may be expanded only if the expansion does not increase the nonconformity. Therefore, the possible addition to the footprint would only be under conditions that met this criterion. The text will be clarified to reflect this.</p>	<p>39</p>
<p>King County is proposing to modify its critical areas ordinance to allow the footprint of an existing residential structure located within critical areas buffers to be expanded by up to 1,000 sq. ft. Would mitigation to ensure no net loss of ecological functions be required? A conditional use permit should be required for such expansions. Recommend that allowed expansion of up to 1,000 square feet be reduced or strictly conditioned.</p> <p>Please consider adding the following regulation, excerpted from the Whatcom County critical areas regulations: <i>Expansion, alteration, and/or intensification of a non-conforming use, building or structure, excluding normal maintenance is prohibited if such use will produce impacts that degrade the critical area, including but not limited to vegetation clearing/ additional impervious surfaces; generation of surface water runoff; discharge, or risk of discharge of pollutants increase noise, light or glare.</i></p>	<p>Allowing expansion of an existing residential structure up to 1,000 sq. ft. within buffers is an existing standard in the King County CAO. Mitigation is currently and would continue to be required for such expansions.</p> <p>A shoreline conditional use permit will not be required in association with the expansion of a residential structure in critical area buffers. Critical areas regulations address the expansion of structures and require mitigation to ensure no net loss of ecological functions. Requiring a shoreline conditional use permit in addition would not add any value to this regulation.</p> <p>King County's critical areas regulations are consistent with the suggested Whatcom county regulatory language.</p>	<p>168, 172</p>

Summary of Comment	King County Response	Commentor(s)
Silt screens should be required near lakes and other critical areas in all seasons rather than just the current wet season regulations from October through April. A number of instances when this would have prevented pollution are reported. More education	The King County Surface Water Design Manual requires silt screening on a countywide basis during the wet construction season of October through May (Core requirement #5). However, critical areas can have further requirements for erosion and sediment protection, depending on the site and project. If a particular project within a critical area buffer does not seem to have appropriate measures in place, a request can be made to DDES for a site violation inspection. Increased education about temporary erosion control is a good idea and will be explored.	58
The most recent house built on Shady Lake is 65 feet back and is into the water table and gets wet every time the lake gets high. No one should be that close. It's also 5' apart from another house which is a fire hazard.	Permitting of construction on several parcels on Shady Lake were investigated as a result of citizen comments, and none were found to be in permit violation, although in at least one case the permit was granted before critical areas regulations went into effect and would not have been issued under current or proposed regulations.	118
Remodeling, bulkhead repair and other shoreline projects should be required to be within the existing footprint of the structure, reduce impervious surfaces (including lawns), and should restore native plants along the shoreline.	Allowing expansion of existing residential structures within buffers is an existing standard in the King County critical areas regulations. However, such expansions must provide mitigation to ensure no net loss of ecological functions. Mitigation is currently and would continue to be required. The Shoreline Restoration Plan is intended to address past impacts to shorelines.	176
Give more attention to wildlife habitat, especially increased greenbelts for wildlife in shoreline areas.	Wildlife habitat is protected in a variety of ways in King County. The Shoreline Master Program adopts the same protection standards as the CAO which protects vegetation in riparian areas and, in rural areas, non-riparian areas, as well as wildlife habitat conservation areas and designated Wildlife Networks. These actions provide extensive wildlife habitat while also providing functions and protection for shorelines. Additionally, over the past couple decades, King County has been active in protecting high quality natural areas and working forests through acquisition, tax incentives and conservation easements. These actions provide a variety of functions, including wildlife habitat (see http://dnr.metrokc.gov/wlr/lands/natural/ for more detail of King County's programs).	181
The definition for channel migration zone should be revised to clarify that areas exempted from the zone must be outside of the Urban Growth Area and channel constraints must be built above the 100-year flood elevation.	This revision to the Glossary has been made to clarify the definition of channel migration zone.	164
New development and shoreline modifications should not be allowed to interfere with channel migration (WAC 173-26-221)	A policy has been added to the critical areas policies to ensure that shoreline modifications do not interfere with channel migration.	164

Summary of Comment	King County Response	Commentor(s)
<p>Fill should be located, designed and constructed to protect shoreline ecological functions and ecosystem-wide processes, including channel migration. Fill and dredging disposal policies that protect channel migration also must ensure that filling of side channels does not occur within channel migration areas.</p>	<p>Policies that protect side channels within channel migration zones have been incorporated into the Shoreline Master Plan.</p>	<p>164, 168</p>
<p>How will the critical areas rural stewardship plan provisions be carried into the Shoreline Master program? Some flexibility under rural stewardship plans may be appropriate in order to ensure that development of existing lots results in no net loss of ecological functions.</p>	<p>King County may provide flexibility in shoreline management standards via the rural stewardship planning program (developed as part of the critical areas regulations package). Further evaluation of the program is needed.</p>	<p>168</p>
<p>What is the origin of the provision for adding up to 1000 square feet to structures in the shorelines buffer?</p>	<p>The 1000 square foot addition was initially set in the Sensitive Areas Ordinance in the early 1990s and has been carried forward in subsequent regulatory and policy documents.</p>	<p>24</p>
<p>We have serious concerns that King County is proposing to require a 115-foot buffer, rather than a 165-foot buffer, along shorelines designated as high intensity that are located outside the urban growth area.</p>	<p>There are approximately 1 ¾ miles of High Intensity shoreline outside of the urban growth area (less than 1% of the total number of shoreline miles in King County's jurisdiction); ¼ mile of this shoreline designation is on Vashon-Maury Island. King County proposes to allow a smaller buffer along highly developed shorelines that are zoned for neighborhood business, commercial business, rural business, office and industrial uses. The total area affected by this policy is minimal.</p>	<p>168</p>
<p>It is unclear how the proposed regulations for high intensity, shoreline residential and conservancy shorelines provide a level of protection that is at least equal to the adopted CAO, or the principles and standard for shoreline stabilization found in WAC 73-26-231.</p> <p>How are the State regulations consistent with the County's proposed shoreline modifications policies?</p>	<p>The proposal to allow smaller buffers along High Intensity and Shoreline Residential designations does not constitute a significant change to critical areas regulations. The amount of shoreline designated High Intensity and Residential Shoreline outside of the urban growth boundary is minimal and these shoreline reaches are primarily developed already. Approximately ¼ mile of shoreline is designated High Intensity of Vashon-Maury Island (at the ferry terminals and along the Portage), and approximately 1 ½ miles of shoreline are designated High Intensity and Shoreline Residential (outside of the urban growth boundary) elsewhere in the County. Information gained through the shoreline characterization allowed the County to tailor buffer regulations to existing shoreline conditions in these areas.</p> <p>The State's principles and standards for shoreline stabilization are incorporated into the Shoreline Modifications policies and associated regulations.</p>	<p>168</p>

Summary of Comment	King County Response	Commentor(s)
Reasonable Use		
What ever the buffer, or setback from the shoreline, the County should pay the property owner for the buffer or the setback.	Under the federal and state constitutions, compensation is only required when all reasonable use of property is taken as a result of regulations. Requirements for buffers do not remove all reasonable use of property. In addition, King County has a shoreline variance process that can be used when reasonable use of a property is prevented.	46
The Shoreline Master Plan will confiscate uses and rights of property owners by drastically reducing the value of many parcels of land.	The Shoreline Master Program will not deny reasonable use of property. In examining the impact of other environmental regulations on property values, King County has not been able to find that they have a negative impact.	167
Scenic Vistas and Aesthetics		
Clarify how scenic vistas and aesthetic quality will be protected.	Policy goals regarding scenic vistas and aesthetics have been clarified to state that King County should ensure that proposed developments would provide protection.	164
PUBLIC ACCESS PLAN		
Create more shoreline public access, to keep pace with population growth.	The proposed draft Shoreline Public Access Plan identifies priority areas for providing more public access. This Plan will be implemented through existing King County recreation programs.	181
Control the impacts of and provide more public access facilities on the Green River.	The proposed draft Shoreline Public Access Plan proposes to provide more public access and related services along the Green River.	181
King County should include enhanced public access to the Puget Sound shorelines on Vashon-Maury Island. King County should consider creating a signature shoreline park on Vashon-Maury island that provides at least a half-mile of public shoreline.	King County's existing Maury Island Park provides over a half-mile of public shoreline. Vashon-Maury Island was assessed as part of the development of the Shoreline Public Access Plan; the Island has more public park land per capita than any other rural area of the County and there is no current informal shoreline use illustrating demand for additional Island shoreline access.	173
Provide for more access to shorelines and more open space, parks and public places for citizens to enjoy the natural environment	The recreational element of the draft SMP includes policy goals to provide for public access and or recreation, including protecting existing access and assessing opportunities to enhance future access and recreational opportunities.	181

Summary of Comment	King County Response	Commentor(s)
<p>The Public Access Plan does not address private access opportunities in the analysis. There are no criteria for access opportunities that arise during the development or redevelopment of private sites.</p>	<p>WAC 173-26-221(4)(c) states that “at a minimum, the public access planning should result in public access requirements of shoreline permits, recommended project, port master plans and/or actions to be taken to develop public shoreline access to shorelines on public property. RCW 90.58.020 directs local governments to increase public access to publicly owned shoreline areas. The intent of King County’s Public Access Plan is to identify priorities for providing new public access to major shorelines in the unincorporated area. Requirements for public access on private sites are defined in the Comprehensive Plan, Chapter 5 (see public access and recreation element policy goals and shoreline use and modification requirements).</p>	<p>164</p>
<p>RESTORATION PLAN</p>		
<p>Require that new developments restore past shoreline impacts and use low impact development practices.</p>	<p>The draft Shoreline Master Program includes prohibits any use that that would substantially degrade the existing ecological processes and functions or the natural character of the shoreline area, consistent with State shoreline guidelines. The proposed Shoreline Protection and Restoration Plan would be used to address past impacts. King County’s low impact development standards and requirements are contained in the 2005 Surface Water Design Manual. Appendix C, containing best management practice details is available online at: dnr.metrokc.gov/wlr/dss/swdmapdx.htm#appndxc.</p>	<p>176</p>
<p>The revised draft should require restoration of ecological functions where they have been impaired by past practices. Areas landward of existing bulkheads should be replanted with native vegetation.</p>	<p>The Shoreline Master Program includes a Restoration Plan to address past impacts.</p>	<p>176</p>

Summary of Comment	King County Response	Commentor(s)
<p>The areas to the southwest and northeast of the Gold Beach residential neighborhood should be rated HH in the restoration plan.</p>	<p>The basin condition for this stretch of shoreline was rated High, however there are multiple reaches. Reaches were delineated and evaluated previously in the Technical Appendix. The condition of several of the reaches, like the one containing the Gold Beach residential development, are low based on the technical analysis (Technical Appendix Chapters 2 (B & C) and 7, and Attachment B) and do not warrant an HH rating. The area to the northeast and adjacent to Gold Beach was rated HH in the restoration plan. The area to the southwest and adjacent to Gold Beach was rated HM. This area did not score a high at the reach scale for several reasons, but primarily because the riparian area is composed of shrubs or patchy trees, versus dense mature trees. Due to changes made in the designation criteria, the area to the northwest of Gold Beach is now designated as “Conservancy” due to it being a King County Park property. The area immediately to the southwest of Gold beach is now designated as “Natural”. The designation criteria for “Natural” have been amended and now include scoring a B in the restoration plan within the Aquatic Reserve. This criterion was added to the natural designation for areas within the Maury Island Aquatic Reserve to create greater protection for this important area.</p>	<p>176</p>
<p>The entire southeastern shore of Maury Island should be rated A under the restoration plan.</p>	<p>The basin condition was rated High. However, there are multiple reaches along this shoreline. Reaches were delineated and evaluated previously in the Technical Appendix. The condition of several of the reaches, like the one containing the Gold Beach residential development, are low based on the technical analysis (Technical Appendix Chapters 2 and 7 and Attachment B) and do not warrant an A rating.</p>	<p>172</p>
<p>Add information about invasive weeds to the Restoration Plan</p>	<p>Language was added to the restoration plan about effects of invasive species and King County’s noxious weed control program. Eurasian milfoil and Brazilian elodea are not currently being managed, except locally by marinas using herbicides and hand-pulling by house-boat communities.</p>	<p>170</p>
<p>Provide costs and quantifiable benefits of restoration.</p>	<p>New text on costs and benefits has been added to Restoration Plan.</p>	<p>170</p>

Summary of Comment	King County Response	Commentor(s)
Unintended consequences of restoration and case of O.O. Denny park lake shoreline restoration project.	Restoration projects will be implemented primarily as a WRIA and floodplain management CIPs. As part of the design and permitting process, these CIPs conduct detailed analysis of context and risks and take precautions to ensure that the best ecological net benefit. With respect to the O.O. Denny Park project and potential for impacts to large trees and the sewer line interceptor, the sewer line is a priority and will be protected. Further, the potential effect of trees falling as a result of shoreline erosion would be viewed as part of restoring natural shoreline processes and while standing trees may be lost, additional habitat in the lake and its riparian habitat would be provided by the subsequent recruitment of large woody debris. In any event, while natural processes are a general goal of habitat restoration projects, reasonably foreseeable threats to people, property and infrastructure are considered and avoided.	170
What is the relationship between the baseline used for characterization and assessing restoration options versus restoration actions that will be implemented?	Restoration is a catch-all for actions designed to improve the current condition, but not necessarily to return to predevelopment condition. While the basis for shoreline characterization was the undeveloped condition, the type, extent and location of restoration actions will ultimately depend on existing conditions and context. See Technical Appendix (Appendix E) for definition and detailed explanation of restoration concepts.	170
Please include policies and projects in Appendix A that support the Maury Island Aquatic Reserve Management Plan's goals for restoration and provide a collaborative approach with WDNR towards meeting those goals.	A statement of support for the Maury Island Aquatic Reserve Management Plan has been added to the Restoration Plan.	168
Restoration Plan maps show the type of action recommended according to reach and basin conditions, but does not give any explicit information about King county's restoration priorities. Priorities should be made clear.	Discussion has been added to the Restoration Plan to clarify restoration priorities.	164
Locations of marine projects need to be provided in Attachment A of the Restoration Plan.	A map showing locations of marine restoration projects was added to the Restoration Plan.	164
Prospective funding sources should be given for the projects and programs listed in Attachment A.	Discussion has been added to the Restoration Plan to clarify funding sources.	164
Timelines and benchmarks for implementing restoration projects and program should be given. A mechanism should be identified for ensuring that restoration projects and programs will be implemented according to plans and to appropriately review the effectiveness of the projects and program sin meeting the overall restoration goals.	Discussion has been added to the Restoration Plan to clarify implementation timelines.	164

Summary of Comment	King County Response	Commentor(s)
Add a table to the Restoration Plan that presents the goals, actions and priorities associated with each shoreline reach. Improve links between restoration goals/priorities and restoration projects/programs.	Additional discussion has been added to the Restoration Plan to address goals, actions and priorities associated with shoreline restoration projects and programs.	164
TECHNICAL APPENDIX		
Reach rating seems much too high for conditions along the shoreline noted by a resident.	The reach in question was composed of the lake shoreline combined with an adjacent high quality wetland, which had very different environmental characteristics. The two were separated to allow the assessment to reflect their differing qualities.	190
A variety of corrections to the bibliography of the Technical Appendix. A question about the time period depicted in the shorelines permits plotted on the Land Use Patterns map in the Map Folio.	Corrections to bibliography and glossary noted and were included. The time period represented by the shorelines permit information on the Land Use Patterns map is discussed in the Data Source information on the map.	176
How are steep slopes defined in the Technical Appendix?	Section 2 of the Technical Appendix describes how steep slopes are defined.	164
What soils data was used to evaluate the more urbanized areas of King County?	Soils data was obtained from the Natural Resource Conservation Service (NRCS) for use in technical analyses. The NRCS did a survey of King County lowlands in 1973 and the Snoqualmie Pass area in 1992. Soils data determined the location of clay and organic soils to evaluate the sediment and phosphorous ecological processes. Hydric soils data were used as a surrogate for wetlands (on slopes less than 2%) as part of the wetland loss analysis. Where soil data was not available (primarily in urban and incorporated areas), shoreline characterization rating criteria were modified to remove consideration of soil types.	164
(Table 6) Further explanation should be provided regarding sediment delivery and movement through the river system.	Comment noted in public record – no further changes are being made to the Technical Appendix. See pages 2-27 and 2-43 for a discussion of sediment delivery in river systems.	164
Can data in the ecological analysis be disaggregated to provide information on which process alterations are causing the score?	Comment noted in public record – no further changes are being made to the Technical Appendix.	164
(Attachment E) Further explanation of landslide types needs to be provided.	Landslide types are explained in the Technical Appendix (see page 2-26).	164
CUMULATIVE IMPACTS ASSESSMENT		
Residential uses can occur in the Conservancy designation and along shorelines of high to moderate restoration potential, raising concern that cumulative effects may occur and thus be inconsistent with goals of restoration and protection in Conservancy environment.	Net cumulative effects are not expected to occur given known shoreline development trends, protection standards, mitigation requirements and restoration actions. See Appendix C, Cumulative Impacts Assessment.	171

Summary of Comment	King County Response	Commentor(s)
Concerned about the size of buffers used in the cumulative effects analysis (50 ft buffers).	The 50 ft buffers shown are in the current Shoreline Master Program and were used as part of the modeling effort. They are not recommended as buffers under the proposed update. The CAO buffers (far right column) are what will actually be applied. The Shoreline Master Program must use CAO standards or otherwise provide equal protections.	171
Recommend considering non-regulatory programs in assessing cumulative effects.	It is understood that non-regulatory programs are a major part of efforts to protect shorelines. However, it is especially difficult to address or quantify them in a modeling exercise. Additional discussion has been added to Appendix C to address non-regulatory programs.	171
OTHER		
As part of the Shoreline Program, there should be guidelines for what garden products can be used along the shorelines, and not to dump on the shorelines. More education is needed.	Best management practices, such as wise selection of garden products, are certainly important and King County has produced and made available a variety of educational efforts, such as the natural yard care seminars and many educational materials. However, regulatory actions on garden products have not been considered as part of local regulatory authority to date. The state has banned the use and distribution of specific substances when toxicity has been clearly demonstrated.	107
Regarding the road along Tramp Harbor, when the roadside used to slide, the crews used to just scrape it off into the shore where mother nature intended it. Now they scoop it up into a dump truck and landfill it. Why?	Placement of landslide material as fill waterward of the Ordinary High Water Mark would require obtaining local, state and federal permits. In addition, extensive testing would be required to certify that the material was clean and not contaminated before emplacement. Therefore, according to Department of Transportation staff, at this time it is both safer and more cost effective to remove it from the slide area.	122
Make ecotourism and livability on Puget Sound the main goals for shoreline management.	King County is proposing goals that are consistent with the WA Shoreline Management Act, as required. These goals seek to protect shoreline ecology, increase public access to shorelines and prioritize water dependent uses. Achieving these goals would supp	159
King County should work with urban cities to ensure that Shoreline Master Program updates adequately plan for improving access to the shoreline to meet the needs of our growing communities.	King County has been working with cities that are interested in collaborating on shoreline management since early 2006 and will continue to coordinate with cities until the Shoreline Master Program is adopted.	173

Summary of Comment	King County Response	Commentor(s)
Control (eradicate) tansy ragwort in rural agriculture communities	King County controls noxious weeds, including tansy ragwort, through its noxious weed program. See http://dnr.metrokc.gov/wlr/LANDS/weeds/ragwort.htm for additional information on the noxious weed program. Further King County's Road Services Division removes tansy ragwort from their rights-of-way due to the flowering weed's danger to animals.	181
Add to the Conservancy and Natural Shoreline Environment policies that allow the provision of "vital" services, such as sewer and water, to serve existing needs or planned future development.	This is unnecessary. There is nothing in the proposed policies that suggests that services necessary to serve allowed uses would not be permitted.	165
Concerned about runoff from roadside spraying and would prefer mowing instead of chemical spraying.	The Shoreline Master Program relies on a variety of other County programs to achieve some of its goals, including preventing shoreline water quality degradation that could be caused by improper use of toxic substances, such as herbicides, to control weeds. Herbicides are applied to roadside areas for safety, to reduce impacts to roads caused by root systems of plants, to control of noxious weeds, and to reduce fire hazard. As part of an Integrated Pest Management (IPM) program, King County Roads follows guidelines designed to reduce potential for unintentional effects of roadside herbicide spraying. These guidelines include using licensed technicians to apply chemicals. Further, no routine herbicide spraying is conducted in ditches or near water, including rivers, streams, wetlands, bridge abutments, guardrails near water, levees, back slopes or in moratorium zones, which includes the Snoqualmie Valley and both Vashon and Maury Islands. Although, noxious weed control, which law mandates, can include spot spraying even in moratorium areas. King County offers citizens the opportunity to participate in a companion program to the Roads Maintenance Spray Program. The "Owner Will Maintain Program" allows residents to control vegetation on the right-of-way that abuts their property. For more information, see: http://www.metrokc.gov/kcdot/roads/row/weedcontrol.cfm	181, 99

Summary of Comment	King County Response	Commentor(s)
<p>Increase pollution control and testing to guarantee safe water for fishing, swimming and wildlife health.</p>	<p>King County expends considerable effort controlling and monitoring pollution. The Shoreline Master Program is part of that effort, primarily through regulating the type and amount of development in the shoreline jurisdictional area and in promoting protection and restoration which have ancillary pollution control and reduction benefits. Land use impacts are also controlled by zoning and other regulatory programs such as and Critical Areas Ordinance which operate in the context of the County's Comprehensive Plan (the "Comp Plan"). The Comp Plan places a priority on environmental protection and restoration. The result is a wide range of regulations, programs and stewardship activities that require, provide incentives for or encourage actions to control impacts, including pollution. Specific measures include riparian buffers and native vegetation retention as well as a wide array of best management practices (BMPs) and changes in daily living (such as using mass transit, recycling and composting garbage, native plants and low impact gardening). As for monitoring, King County assesses effectiveness of its actions and exposure to health risks through an extensive program of ambient, outfall and beach oriented monitoring in fresh and salt waters. For more information please see the following websites: http://dnr.metrokc.gov/wlr/waterres/marine/ and http://dnr.metrokc.gov/wlr/waterres/swimbeach/default.aspx .</p>	<p>181</p>

Summary of Comment	King County Response	Commentor(s)
<p>Reduce and prevent sewer leaks, especially those resulting from power outages and heavy rains.</p>	<p>The mission of King County's Wastewater Treatment Division (WTD) is to protect public health and the environment by conveying and treating wastewater for 34 local sewer districts throughout its 420-square-mile regional service area. King County is a wholesale wastewater treatment provider, which means that the local sewer districts send wastewater from their individual collection systems to King County's regional sewer system for treatment. As a result, King County does not control the portion of the sewer system operated and maintained by these local sewer districts.</p> <p>For its portion of the system, King County WTD invests in an asset management program to ensure facilities are regularly inspected and repaired as needed so the system operates reliably. The county also equips its treatment plants and pumping stations with emergency back-up power sources so the facilities can function during an electrical outage.</p> <p>Controlling combined sewer overflows, or CSOs, has been a priority for King County since the 1960s, when nearly 30 billion gallons of sewage and stormwater overflowed into local water bodies during periods of heavy rainfall. As of 2005, the county has reduced CSO volume to less than 1 billion gallons per year, and is currently implementing a plan to control all of its CSOs by 2030. More information about the county's CSO program is available in this online brochure at http://dnr.metrokc.gov/wtd/cso/library/0704CSObooklet.pdf or by calling 206-684-1280 or 711 TTY Relay.</p>	<p>181</p>
<p>The permit for the boat elevator/lift in the tidelands at the waterfront residence of Shawn Hoffman on Point Vashon Drive should be revoked. It is unsightly and is a public safety risk. These types of installations should not be allowed in shoreline management regulations.</p>	<p>The Shoreline Master Program would not allow these types of installations for single family uses. The height limit for mechanical boat lifts associated with residential docks is 10 feet above the ordinary high water mark.</p>	<p>169</p>
<p>It would be helpful to include information regarding the effects of shoreline stabilization on rivers and streams in the fact sheet on bulkheads.</p>	<p>Additional information has been added to the fact sheet on bulkheads.</p>	<p>168</p>

Summary of Comment	King County Response	Commentor(s)
The draft Shoreline Master Plan will conserve additional property from development by adding areas that are not currently included as part of the shoreline.	The comment appears to misconstrue the effect of having property determined to be within the shorelines of the state. That determination does not have an impact on whether property can be developed. A shorelines designation does have an impact on the type of development that is allowed. In nearly all circumstances, the type of development allowed under current regulations will not change as a result of the proposed Shoreline Master Plan and its implementing regulations	167
Use population control to prevent shoreline impacts.	Population control is outside of the scope of the Shoreline Master Program.	46
Help control aquatic weeds	The Washington Department of Fish and Wildlife and the King County Noxious Weed Control Program conduct targeted education programs to prevent new infestations of noxious and invasive plants. Requests for educational programs or materials or reports of new or existing weed infestations can be directed to Katie Messick with the King County Noxious Weed Control Program at katie.messick@kingcounty.gov or 206-263-6461, or to http://dnr.metrokc.gov/wlr/lands/weeds/Infestations-Form.cfm .	178, 181, 188
Concerned about lawn fertilizer use causing algae blooms on rural lakes.	Best management practices, such as wise selection of garden products, are certainly important and King County has produced and made available a variety of educational efforts, such as the natural yard care seminars and many educational materials. However, regulatory actions on garden products have not been considered as part of local regulatory authority to date. The state has banned the use and distribution of specific substances when toxicity has been clearly demonstrated. To learn more, please see information about the Basin Steward Program at http://dnr.metrokc.gov/wlr/basins/stewards.htm . King County also will continue to implement stormwater control regulations (King County Code Title 9), updated in 2004, on shorelines of the state. To learn about King County stormwater regulations, please see http://www.metrokc.gov/ddes/cao/ .	27, 194
Will the State monitor shorelines?	King County will reassess shoreline conditions whenever the Shoreline Master Program is updated. King County is required to update its Program every 7 years.	27
Allow new dams because 1)certain municipalities need domestic water 2) flood control of the Snoqualmie River is needed Solve both problems by building water impoundment dams in the North, South, and Middle forks of the Snoqualmie river System and Tolt	The Shoreline Master Program is not responsible for decisions on flood control and municipal water. Those are addressed by other programs.	182

Summary of Comment	King County Response	Commentor(s)
There's an article about a marine restoration project on the West side of outer Quartermaster Harbor. Septic systems are a problem all around quartermaster harbor and the restoration project should include the whole area.	Restoration projects can be initiated by many different agencies and at differing scales, depending on the stated goal. This referenced project is not identified. At this time, no plans for offering sewerage around Quartermaster Harbor is anticipated. In recognition of the Aquatic Marine Reserve designated by the State DNR, the natural shoreline designation criteria were broadened along the shorelines of the Reserve to afford addition protection.	78
Allow tree houses that are smaller than 200 square feet in shoreline jurisdiction.	King County would have to explore the impacts of tree houses further before adopting such a standard, considering the shoreline designation and potential impacts to critical areas and vegetation.	103
At marine park on Maury Island, state DNR removed old pilings. Can the dock be replaced, since it's one of the very few public access docks on Vashon?	This question should be directed to King County Parks. They are owners of the property and made the determination to remove the structure.	122
Require that pet waste on beaches be cleaned up by owners as part of the Shoreline Master Program.	Pet owners re required to clean up after their pets in King County parks as per King County Code 7.12.410.	1
Control the spread of noxious weeds and invasive plants at boat launches	The Washington Department of Fish and Wildlife and the King County Noxious Weed Control Program conduct targeted education programs to prevent new infestations of noxious and invasive plants at motorized boat launches. Requests for educational programs or materials or reports of new or existing weed infestations can be directed to Katie Messick with the King County Noxious Weed Control Program at katie.messickkingcounty.gov or 206-263-6461, or to http://dnr.metrokc.gov/wlr/lands/weeds/Infestations-Form.cfm .	27
Shoreline public workshops are a waste of time; the County should spend money on field work to assist property owners and improve shoreline conditions instead.	King County is required by the State to update its Shoreline Master Program - via an open public process - and implement shoreline protection regulations. The County's Department of Natural Resources and Parks does run ongoing shoreline restoration and stewardship programs; more information on this work can be found at http://dnr.metrokc.gov/wlr/basins/stewards.htm .	18
ISSUES STILL UNDER STUDY BY KING COUNTY		
Expansion of a non-conforming residence within the buffer/setback is not allowed, per case law. A variance would be required.	King County is studying case law regarding the expansion of non-conforming residences in buffers.	164
What does historic access mean (regarding design requirements for easements for King County trail or historic access)? Can it be defined? Can it be deleted?	The policy language on historic access was carried over from the existing shoreline regulations and needs to be reexamined. King County will work on constructing a reasonable definition of what constitutes historic access routes across property in order to clarify the meaning.	118

Summary of Comment	King County Response	Commentor(s)
Add to the definition of water related use a provision that recognizes the need for medium wave radio antennae to be located in areas with moist earth.	Staff are researching this issue for possible inclusion in a subsequent draft.	166
The Shoreline Master Program should include "light rail" and any necessary structures as a permitted use in the shoreline. Siting light rail should only require a substantial development permit and not require a conditional use permit in all shoreline environments. Height limits need to recognize that the need for light rail structures.	The Shoreline Master Program relies on the zoning code to establish the range of permitted uses allowed within the shoreline. Amendments have been proposed to the King County Zoning Code that would treat light rail facilities in the same fashion as roads and "heavy" rail is treated.	163
I suggest that the County define light rail transit system so that the scope of the permitted use is clear, and I suggest the County consider using the definition that other jurisdictions, such as the City of Seattle, have used.	This issue is addressed in the King County Comprehensive Plan update.	193

1 Anonymous (multiple commenters)
2 Steve Abel
3 emma amiad
4 Gary J Anderson
5 Fletcher Andrews
6 Steve and Jean Andrus
7 Devin, Alex, Elizabeth Atkins
8 Colby Atwood
9 Jack Barbash
10 James M Bartlemay
11 Megan Belia
12 Andrea Bellon
13 William Bonnell
14 Sherry Bottoms
15 Helen Brocard
16 Steven and Sally Brown and Fox
17 Christopher Cain
18 Robin Calderon
19 Barbara Calvo
20 Susan Carette
21 Maurice Carpenter
22 Mike Carson
23 Jerilyn Carstairs
24 Grace Christophersen
25 Gary Christopherson
26 Donald Cole
27 William Cooper
28 Mark Corliss
29 Howard A. and Sharon L Cottier
30 Kim Cunningham
31 Rick and Kristine Dahms
32 Dorsey Davis
33 Michael Dawson
34 Tom Dean
35 Amy Derenthal
36 Terry Dievendorf
37 James Distelhorst
38 Sandra Distelhorst
39 Bob Dixon
40 Enid Dolstad

41 Rebecca Douglas
42 Carol Eggen
43 Courtney Estevenin
44 Stephanie, Bruce Fairweather
45 Kathleen Farner
46 Greg Fawcett, D.D.S.
47 Jean Findlay
48 Brett Fish
49 Kathleen Fitch
50 Elsie Foley
51 Saul Fortunoff
52 Sally Fox
53 Ellen Frohning
54 Julea Gardener
55 Randy and Candy Garl
56 Julie Gaspers
57 May John Gerstle
58 Beverly Giberson
59 Kathleen Gilligan
60 Anne Gordon
61 Joanna Guglielmino
62 Dick Hadley
63 Mark D. Hafermann
64 Colleen Hanrahan
65 Robert Harmon
66 Virginia Harriman
67 Betty Hawkins
68 Eric Heffelfinger
69 Mara Heiman
70 Kathleen Hendrickson
71 Thomas Herring
72 Jennie Hodgson
73 Trevi Housholder
74 Brenda Howald
75 Jeff Hoyt
76 Alan Huggins
77 Amy Huggins
78 Kate Hunter
79 David and Gigi Jack
80 Michael Jacobs
81 Douglas Johnston
82 Marnie Jones
83 Thomas Kaufer
84 Daniel Klein

85 Joseph Koncsek
86 Yvonne Kuperberg
87 Barry E Ladenburg
88 Julia Lakey
89 Eugene Lipitz
90 Susan Lowrey
91 Richard Lund
92 James and Vicki MacRae and Ward
93 Karl Maiwald
94 Lila M Maiwald
95 Paul Martinez
96 Jeff Mash
97 Roy McMakin
98 Helen Meeker
99 Stan Merrell
100 Linda Miller
101 Dylan Morgan
102 Brad Mulvihill
103 Pete Nelson
104 Roger Newby
105 Aaron Niemi
106 Carl Olsen
107 Betty Olson
108 Edeen M Parrish
109 Leslie Patterson
110 Karen Perla
111 David Pfeiffer
112 Doug Pine
113 Amelia Powers
114 Dorlir Rainey
115 Michelle Ramauro
116 Michelle Ramsden
117 Lesley Reed
118 Mark Reeves
119 Lori Rice
120 Jack Richards
121 Dean Richardson
122 Karlista Rickerson
123 Barbara Roberts
124 Moira Robinson
125 Margaret Rothschild
126 Ivy Sacks
127 Barbara Sestrap
128 Kathy Shaw

129 Kristie Simard
130 Zach Simard
131 Kimberly Sims
132 Nancy Sipple
133 John (Jacq) and Beverly Skeffington
134 Marla Smith
135 Jeanne and Gerald Snell
136 John Spear
137 Ron Speer
138 Camilla Spencer
139 Jeff Spencer
140 Bill Stone
141 Susan Sullivan
142 Marcy Summers
143 Anna Swain
144 Maia Syfers
145 Chas Talbot
146 Charles Torreu
147 Vernon, Christine, Laura, Sarah Trevellyan
148 Mary Tuel
149 March Twisdale
150 Joseph and Edith Ulatoski
151 Kari Ulatoski
152 Harriet Van Buren
153 Nancy Vanderpool
154 Jackie VanGilder
155 David Warren
156 Tracey Wayman
157 Susan White
158 Faye Wilkinson
159 Sara Wood
160 Melodie Woods
161 Celina Yarkin
162 Kathy Zapp
163 Sound Transit
164 Wash Dept of Ecology
165 Soos Creek Water and Sewer District
166 Wash St Assn of Broadcasters

167 Mill Creek / Mullen Slough Basin Property Owners
168 People for Puget Sound, Washington Environmental Council, and Futurewise
169 Matthews
170 Shoreline Property Owners and Contractors Association
171 Washington Department of Fish and Wildlife
172 Gendler and Mann, LLP
173 Trust for Public Land
174 League of Women Voters
175 Ann Aagard
176 Pat Collier
177 Lee Culverwell
178 Karen Brad Dennis
179 Cindy Druschba
180 Jim Ebbers
181 Stephanie Fenton-Delaurenti
182 Glenn Gardner
183 David Glenn
184 Paul Gorman
185 Susan Gorman
186 Dewey Hill
187 Nancy Iverson-Golden
188 Jack Lewis
189 James Locatelli
190 Jonathan Morrison
191 Jim Myers
192 Deloa Parrish
193 Patrick J. Schneider
194 Dale Sherman
195 Scott White
196 Laura Wishik