

Merrill, Hannah

From: pearl hewett [REDACTED]
Sent: Wednesday, October 19, 2011 9:04 AM
To: zSMP; Lois Perry; Sue Forde; Jo Anne Estes; Jay Petersen
Cc: Marv Chastain; Jim McEntire; harry bell
Subject: WAC'S AND NO NET LOSS

TO WHOM IT MAY CONCERN

I submit this as my comment on NNL
Pearl Rains Hewett Trustee
George C. Rains Sr. Estate
Member SMP Advisory Committee

NO NET LOSS of Shoreline Ecological Functions IS NOT A LAW

FOUND ON PAGE (1) AND PAGE (47) OF A 48 PAGE REPORT AND KEEPING IN MIND THAT WAC's ARE NOT LAWS

SMP HANDBOOK Chapter 4

The SMP Guidelines, adopted in 2003, constitute the first actual rule (**WAC**) in Washington State to incorporate the **no net loss requirement. The concept of no net loss in this State originated with earlier efforts to protect wetlands. In 1989**, Governor Booth Gardner signed an Executive Order establishing a statewide goal regarding wetlands protection. "It is the interim goal...to achieve no overall net loss in acreage and function of Washington's remaining wetlands base. It is further the long-term goal to increase the quantity and quality of Washington's wetlands resource base." (E.O. 89-10).

Read on if you are interested

SMP NNL Handbook Last updated 6/22/2010

8. Specific Shoreline Activity and Use Standards Numerous additional specific references exist in the SMP Guidelines, requiring SMP regulations resulting in **no net loss** of shoreline ecological functions. Specific shoreline activity standards referencing NNL are located at: WAC 173-26-221(2)(c)(ii)(C) and (D): Geologically hazardous areas. WAC 173-26-221(2)(c)(iii)(C): Critical saltwater habitats

WAC 173-26-221(2)(c)(iv)(C): Critical freshwater habitats

WAC 173-26-221(3): Flood hazard reduction

WAC 173-26-221(4)(d): Public access

WAC 173-26-221(5): Shoreline vegetation conservation

WAC 173-26-221(6): Water quality, storm water and nonpoint pollution

WAC 173-26-231: Shoreline modifications, including shoreline stabilization, piers and docks, fill, breakwaters, jetties, groins and weirs, beach and dunes management, dredging and dredge material disposal, shoreline habitat and natural systems-enhancement projects.

Specific shoreline use standards referencing NNL are located at:

WAC 173-26-241(2)(a)(iv), addressing the following uses:

Agriculture

Aquaculture

Boating facilities

Commercial development

Forest practices

Industry

In-stream structural uses

Mining

Recreational development

Residential development

Transportation and parking

Utilities