K'Allen Specht

K"Allen. Good enough. Okay, you won"t expect. Thank you. My name is K"Allen Specht. My comments today address proposed WAC 173-26-090, concerning shoreline master program implementation and effectiveness. At Soundview Drive Northwest in Snohomish County, a 50-foot public right-of -way extends to the waters of Port Susan. In 2010, Ecology recorded this location in its Coastal Atlas as public shoreline access site WS01390, identifying pedestrian and visual access, roadside parking, and neighborhood-scale use. In 2015, County records described large cement pillars found blocking public beach access. County traffic operations stated, we wouldn"t authorize such action. Fire District 14 called it their only access to the beach and recommended removing the pillars. The pillars remain in place.

In 2021, an adjoining property owner requested towing signs invoking the sheriff"s authority to be attached to existing no-parking and no-beach-access signs. County maintenance records document the installation of what staff called a ghost sheriff sign. In 2023, county records show another request for a sign reading “by order of the sheriff violators will be towed,” bearing the sheriff"s emblem.

In 2025, when the county engineer asked whether county no-parking signs normally carried that warning, traffic operations answered no, none of our signs would have that verbiage. These are documented actions affecting public shoreline access, yet none resulted in formal shoreline decisions or appeared in shoreline permit proceedings. The county has nevertheless acknowledged the right-of-way remains available for public use.

Ecology’s proposed periodic review requirement, evaluate shoreline authorizations for consistency with public access policies. But administrative decisions, signage, enforcement, and tolerated obstructions can materially restrict public access without generating an authorization. I ask Ecology to add one item to the minimum evaluation requirements in WAC 173-26 090, subsection 2, lowercase b, numeral Roman numeral 3, uppercase D, Roman numeral 2, material changes to existing public shoreline access, whether or not associated with a shoreline authorization. This would ensure periodic reviews consider actual changes to public access, not just permit records. The effectiveness of a shoreline master program should be measured by what happens to the shoreline, not merely what happens in its files. Thank you. Appreciate the opportunity.