Todd Hall

Comments submitted on behalf of City of Kenmore:

1. Clear transition guidance or grace period for jurisdictions with critical areas/buffer work already underway when rulemaking takes effect. This will eliminate/limit rebuilding City development standards during project mid-stream.
2. Regarding multiunit "public benefit" definition, confirm whether ecological restoration/enhancement tied to a development counts as a qualifying "public benefit" under WAC 173-26-241(3)(j), or whether it's strictly limited to public access.
3. Very concerned on the expansion of native vegetation across all shoreline jurisdiction, not just buffer areas. This creates a significant mapping & regulatory burden that will affect implementation (staff time) and cost, especially paired with the new tracking/data-submittal requirements to Ecology. What funding will the State provide cities to update this, or is this another unfunded requirement that cities need to pay for?
4. Regarding the tracking and reporting, what frequency is Ecology looking for (e.g., annual, monthly)? Since cities already report various data sets annually to other state agencies and King County, how will this fit into our workflow or will it just mean that we need to cc: Ecology on every exemption decision?
5. Regarding mapping shorelines of the state, who will be responsible for conducting periodic reviews of GIS maps for streams, rivers, and lakes, and what is the process? While Kenmore requires delineations for development projects, Ecology requirement sounds broader. How will the City handle this new requirement given that we don't delineate these areas on private property?