Andrew Hicks

I just wanted to express a concern with the proposed amendments to WAC 170-320-7050, particularly the requirement that local governments are going to be required to prepare and transmit exemption decisions and supporting documentation to Ecology for essentially every exempt shoreline development. I am a local shoreline administrator for Whatcom County, and I"m struggling to understand what problem this additional requirement is intended to solve. Local governments are already responsible for determining whether development qualifies for an exemption and ensuring consistency with the applicable SMP. The proposed requirements, in my opinion, they appear to add a considerable amount of administrative burden, particularly for routine residential development and minor projects, without necessarily improving environmental protections or the quality of permit decisions.

I"m also questioning whether Ecology"s estimate or estimated time of 10 minutes of additional staff time per exemption accurately reflects the work involved in preparing the required analysis in completing the additional data sheet and transmitting the supporting materials. I"m also confused about exactly what needs to be transmitted. I don"t know how you identify which exemption is more applicable. As an example, if you"re dealing with single family residential development versus maintenance, they can be both categories. I"m not sure exactly what is being pursued there. Anyway, I"d like ecology to explain what specific regulatory deficiency has been identified under the existing process, and why a less burdensome reporting mechanism couldn"t accomplish that same objective. Thank you.