

Attachment D: Responsiveness Summary: Blaine SMP – Comprehensive Amendment
Ecology Public Comment Period, January 3– February 2, 2016

Comment Number	Date:	Commenter	Comment	Local Government Response and Rationale	Ecology Response and Rationale
1	1/10/2017	Tani Sutley	Generally likes the SMP with exception of the Use and Development Matrix. Instead of the language reading “see limitations in text”, would rather have limitations listed with the matrix for ease of use.	<p>We do not intend to change the note on the Use and Development Matrix.</p> <p>The matrix is intended to be a quick reference guide. Adding all the notes and information necessary to fully capture the regulatory framework would undermine the use of the matrix as a quick reference guide by making it long, detailed and cumbersome. The matrix should not be relied upon as the regulatory standard. We do not want to add some detail that could mislead the reader into thinking that all the rules are in fact included in the matrix.</p>	
2	2/1/2017	Kathleen Capson	<p>Suggests the following changes to Section 7.9.1.A – Wharf District:</p> <ol style="list-style-type: none"> 1. Add the following language to the end of the first paragraph: “The Wharf District also contains a public boat launch located at the southeast corner of the marina. The launch provides parking for 62 boat trailers and was constructed with IAC (Interagency Committee for Outdoor Recreation) funding support. 2. Revise the first sentence of the third paragraph to read: “Direction and guidance for development in this district is provided by the November 2007 Wharf District Master Plan (a component of the Blaine Comprehensive Plan), approved by both the City of Blaine and the Port of Bellingham. 	<p>1) We concur with Ms. Capson’s suggestion to add a reference to the public boat launch. We do not intend the level of detail related to the number of parking spaces or the source of funding for the facility and this is not consistent with the level of detail of other similar facilities noted in the plan. Our proposed change is as shown below with new text <u>underlined</u>.</p> <p>The Wharf District includes a working waterfront with an industrial area, port facilities, a marina providing moorage for commercial fishing vessels, warehouse and storage space for the fishing industry, and space for recreational vessels. The Wharf District plan includes provisions for substantial public access to the shoreline and also for commercial uses and multifamily housing consistent with the character of the area. The plan recognizes the need to regulate development on the shoreline consistent with the wide range of water dependent, water related and water enjoyment commercial, industrial, residential and recreational uses. The Wharf District also includes some of the city’s largest shoreline areas managed for shoreline recreation, those are Marine Park, the Blaine Fishing Pier, and the proposed Plover Park. <u>The Wharf District also includes a public boat launch located at the southeast corner of the marina.</u></p> <p>2) We do not intend to add the “November 2007” reference to the Wharf District Master Plan as suggested by Ms. Capson.</p> <p>The specific version of the Wharf District Master Plan that is</p>	

				<p>adopted by the SMP is included as an appendix. If there are any future changes to the Wharf District Master Plan it will require revising and replacing the appendix in its entirety. If a specific date or version of a document is added in the text of the SMP, it is then necessary to change the text of the SMP when processing an update. In our experience these text references are the source of scrivener's errors that generate internal inconsistencies. We expect that the Wharf District Master Plan and the Resort Semiahmoo Master Plan will likely be amended in the future and we wish to avoid developing document errors and internal inconsistencies in the future.</p> <p>The City adopted an amendment to the Wharf District Master Plan and the most recent version will be included with our final SMP submittal. The revision further supports marine industry and recreational boating uses adjacent to the shoreline.</p>	
3	2/2/2017	Department of Archaeology and Historic Preservation (DAHP)	<p>"On page 25 and in regard to Policy 4.5F, we recommend a change in wording to read something like the following: Encourage the marine industrial and...private use <u>and heritage</u> of Blaine's economically important shoreline areas."</p>	<p>We concur with the change proposed by DAHP. See City-proposed edit below.</p> <p>Policy 4.5F: Encourage the marine industrial and mixed use re-development of the Wharf District SMU, and the tourist-commercial and residential development of the Semiahmoo Spit SMU. These unique and important sites should be developed consistent with the Program to enhance the public and private use <u>and heritage</u> of Blaine's economically important shoreline areas.</p>	
4	2/2/2017	DAHP	<p>"Also on page 25 in regard to section 4.7, we recommend some clarifying in language to read as follows: An element related to the protection and restoration of buildings, structures, sites, districts, objects and landscapes, have archaeological, historic...of the City of Blaine."</p>	<p>We concur with the change proposed by DAHP. See City-proposed edit below.</p> <p>An element related to the protection and restoration of buildings, sites, <u>districts, objects, landscapes</u> and areas having archaeological, historic, cultural, scientific or educational values within the shorelines of the City of Blaine.</p>	
5	2/2/2017	DAHP	<p>"We recommend changes to policy language under Goal 4.7 to be more proactive in protecting resources. Following is suggested new language:</p> <p>Policy 4.7A: Developments within shoreline areas shall avoid or minimize impacts to sites having archaeological, ...value or significance.</p> <p>Policy 4.7B: Opportunities for education related to...features shall be sought and where appropriate be incorporated into...and development.</p> <p>Policy 4.7C: Preserve and re-develop historic structures in a</p>	<p>We concur with some of the changes proposed by DAHP. See City-proposed edit below.</p> <p>Policy 4.7A: Developments within shoreline areas should be encouraged and, shall avoid or minimize where appropriate, required to avoid or minimize, as feasible, impacts to sites having archaeological, historic, cultural, educational or scientific value or significance.</p> <p>Policy 4.7B: Encourage Opportunities for education related to archaeological, historical and cultural features <u>shall be sought</u></p>	

			manner that preserves...the goals of this Program.”	<p>and where appropriate be incorporated and incorporate such opportunities into public and private programs and development.</p> <p>Policy 4.7C: Encourage the re-development of <u>Preserve and redevelop</u> historic structures in a manner that preserves their context, <u>as feasible</u>, while allowing new uses that enhance the goals of this Program.</p>	
6	2/2/2017	DAHP	<p>“On page 35 under 7.5.3, we recommend a change in language to read something like the following:</p> <p>Policy 7.5.3B: Access may be permitted for...provided <u>that these resources are protected and will not be adversely affected and</u> that no significant ecological...will result.”</p>	<p>We concur with some of the changes proposed by DAHP. See City-proposed edit below.</p> <p>Policy 7.5.3B: Access may be permitted for scientific, historical, cultural, educational, and low-intensity water-oriented recreational purposes, provided <u>that these resources will be protected and</u> that no significant ecological impact on the area <u>or resource</u> will result.</p>	
7	2/2/2017	DAHP	<p>“In section 8.1, we recommend different language so that the language is more proactive for protection of resources and revise the introductory sentence to include a broader range of cultural resource types. Following is suggested language:</p> <p>Significant archaeological, cultural, and historic resources can include sites, districts, buildings, structures, objects, and landscapes that enriches our quality of life, provides economic benefits, and provides us with information about the past that continues to shape our community. These resources can be found anywhere but particularly along shorelines because of the proximity of food resources...provide to our past, these locations shall be preserved.”</p>	<p>We concur with some of the changes proposed by DAHP. See City-proposed edit below.</p> <p>Native American and pioneer villages, military forts, old settlers’ homes, and trails were often located on <u>Significant archaeological, cultural, and historic resources can include sites, districts, buildings, structures, objects, and landscapes that enriches our quality of life, provides economic benefits, and provides us with information about the past that continues to shape our community. These resources can be found anywhere but particularly along shorelines</u> because of the proximity of food resources and because water provided a practical means of transportation. These sites are nonrenewable resources and many are in danger of being lost through present day changes in land use and urbanization. Because of their rarity and the educational and cultural links they provide to our past, these locations should be preserved whenever possible.</p>	
8	2/2/2017	DAHP	“In Policies 8.1A, 8.1B, 8.1C and 8.1D, we recommend changing “should” to “shall”.	<p>We do not agree with these proposed changes. “Should” as defined by our SMP means “that the particular action is required unless there is a demonstrated, compelling reason, based on policy of the Shoreline Management Act and this Program, against taking the action” and is defined as such.</p> <p>We believe this is a strong mandate, and adequate to protect the resources without adversely impacting private property rights and other uses of the shoreline, with unduly putting cultural resources at risk of degradation.</p>	

9	2/2/2017	DAHP	"In section 16.04.030, we recommend including a definition for cultural resources."	<p>We concur with most of the DAHP suggestions to add definitions. We did not add "significant" and did not add "historic site" definitions.</p> <p>"Archaeology" was added and defined as proposed by DAHP. Defined to mean systematic, scientific study of the human past through material remains.</p> <p>"Archaeological Object" was added and defined as proposed by DAHP. Defined to mean an object that comprises the physical evidence of an indigenous and subsequent culture including material remains of past human life including monuments, symbols, tools, facilities, graves, skeletal remains and technological by-products.</p> <p>"Archaeological Resource/Site" was added and defined as proposed by DAHP. Defined to mean a geographic locality in Washington, including, but not limited to, submerged and submersible lands and the bed of the sea within the state's jurisdiction, that contains archaeological objects.</p> <p>"Significant" was not added.</p> <p>"Historic Preservation Professional" was added as proposed by DAHP. Defined to mean those individuals who hold a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history, or a bachelor's degree in architectural history, art history, historic preservation or closely related field plus one of the following:</p> <p>a. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or</p> <p>b. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.</p> <p>Historic Site was not added.</p> <p>"Professional archaeologist" was added to "Archaeologist" and defined as proposed by DAHP. Defined to mean a person with qualifications meeting the federal secretary of the</p>	

				interior's standards for a professional archaeologist. Archaeologists not meeting this standard may be conditionally employed by working under the supervision of a professional archaeologist for a period of four years provided the employee is pursuing qualifications necessary to meet the federal secretary of the interior's standards for a professional archaeologist. During this four-year period, the professional archaeologist is responsible for all findings. The four-year period is not subject to renewal.	
10	2/2/2017	DAHP	"In general the language regarding cultural resources does not provide specific protocols to follow upon the discovery of archaeological resources nor does it comply with state laws for the protection of such. We recommend adding more specific language and processes so that the language is clearer and complies with state laws. To that end we have attached a copy of DAHP's model shoreline language for your use."	We propose to add more specific protocols in regard to the discovery of archeological resources. We have included proposed draft language in our revised submittal attached to this summary.	
11	2/2/2017	Department of Natural Resources (WDNR)	"The City of Blaine Shoreline Environmental Designation Map did not include 2.25 linear shoreline miles of the existing Drayton Harbor (Blaine) Harbor Area, which was established on September 1, 1891 by the Harbor Line Commission under Article XV of the Washington State Constitution. Harbor areas are reserved for landings, wharves, streets, and other conveniences of navigation and commerce. At the time of the harbor area creation, the Harbor Line Commission also established four state waterways, which are dedicated as highways to facilitate water to land and land to water commercial activities. The existing Drayton Harbor Area as well as the waterways are managed by the Department of Natural Resources. Any future development within these areas may require authorization from DNR."	We are aware of the waterways and state owned tidelands. We understand this to be an advisory note. We have found no reference in the SMA that requires inclusion of the Harbor Line Commission waterways. We do not intend to make any changes to the Shoreline Environmental Designation Map.	