

Public Comment Summary: City of Bellingham Shoreline Master Program Limited Amendment

The following written comments were received during the Ecology Comment Period (October 15 – November 17, 2014)

ITEM	SMP Section	Commenter	Comment / Concern	Local Government Response / Rationale	Ecology Response / Rationale
01	Environment Designations: 22.11.10	Louann Chapman	The city needs to update its SMP supporting documentation as it is unclear what criteria were used to justify the changes to the environment sub-designation at the log pond from Waterfront District (WD) – Recreational Use to WD Mixed Use. Specifically, it has not been shown how the amendments would protect shoreline ecological functions.		
02	Environment Designations 22.11.10	Barry Wenger	Many years were spent by the state, city and the port to inventory, analyze, plan for and justify the area around the log pond as a Recreational Use sub-designation. This should not be discarded in favor of the proposed non-water-oriented Mixed Use sub-designation.		
04	Environment Designations 22.11.10	Pam Borso	“The proposed amendments include changing land use areas and would open the area for maritime industrial uses. These are not necessarily in the public’s interest as they would not protect the shoreline ecology and should not be approved.”		
05	Environment Designations 22.11.10	Sandra Randall	With the empty storefronts in downtown Bellingham, development should be focused there. The log pond area needs a recreational park for use by people with a habitat buffer of 150-ft rather than 50-ft.		
06	Environment Designations 22.11.10	Stefan Pashov & Amy Pashov	There are other locations within the city for business development. The shoreline is a limited resource and should be reserved for activities that enhance quality of life and showcase our beautiful natural location. The waterfront should be cleaned up and redeveloped for use as a park and as natural habitat. Keep the log pond, and waterfront area as a whole as a recreational area.		
07	Environment Designations 22.11.10	Blue Green Waterfront Coalition	The log pond area has long been envisioned as an open recreational space where habitat and public access could coexist. Many in the community were disappointed when the WDP designated this area for industrial use. The log pond is colonized with eelgrass and used as a seal haul out. The BlueGreen Coalition supports the designation of this area for industrial use but only if the buffer is widened to 125-feet with an additional 25-foot vegetated building setback. The larger buffer and setbacks would ensure adequate separation between adjacent		

			<p>commercial and industrial uses and the marine shoreline while leaving adequate space for recreation and habitat restoration to coexist. Without these additional protective measures, amending the sub-designation is inappropriate.</p> <p>These comments were provided to city during the public hearing dated May 15, 2013 but were not adequately considered as part of the waterfront planning process.</p>		
08	Environment Designations 22.11.10	Blue Green Waterfront Coalition	<p>"We support the use of light industry, habitat, and recreation in the long pond area, in accord with the Shoreline Management Act. A new policy for the shoreline mixed use designation must be added which states uses are preferred in the following sequence: water-dependent, water-related, water-enjoyment, and then non-water-oriented."</p>		
09	Environment Designations - BMC 22.03.030	Wendy Harris	<p>The City lacks a purpose statement, designation criteria and management policies for the new environment designations being proposed which are required by WAC 173-26-211(4). As such, it is unclear how and why the environment designations were determined or how they protect ecological systems.</p>		
10	Environment Designations 22.11.10	Wendy Harris	<p>The proposed environment designation changes will increase density and intensity of shoreline use.</p>		
11	Environment Designations 22.11.10	Wendy Harris	<p>Shoreline environment designations should not be changed lightly to accommodate the latest development proposal.</p>		
12	Environment Designations - BMC 22.03.030	Wendy Harris	<p>Environment designations inherently have significant environmental impact. They are the foundation on which the SMP is built as they direct the creation of policies and regulations to implement their purpose. Environment designations are based on a detailed functional assessment of each shoreline reach including biological and physical character, land use patterns and community values. Nothing has changed in the ecological function of the WD shoreline.</p>		
13	Environment Designations 22.11.10	Wendy Harris	<p>Increased shoreline development is problematic for the log pond, which is an area that has always been identified for shoreline habitat restoration. The area contains an eelgrass restoration project intended to provide habitat for ESA-listed fish species. The proposed amendments are likely to have a significant environmental impact yet no increased mitigation has been considered in the process.</p>		

14	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Barry Wenger	There is no basis under the SMA or its implementing rules that allow for stand-alone, non-water-oriented uses, nor is it consistent with the current SMP and its supporting documents. Stand-alone non-water-oriented industrial and commercial uses have no place within the shoreline jurisdiction, especially adjacent to an area ideal for public access like the log pond.		
15	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Barry Wenger	The log pond represents the only relatively accessible and restorable beach within the WD shoreline which is dominated by vertical wharfs and bulkheaded fill. It makes little sense to allow non-water-oriented uses to impinge on this unique location.		
16	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Henry Kastner	The use exception area is not consistent with the SMA, which discourages non-water-oriented uses in favor of those that preserve ecological function, public access and limited maritime industry.		
17	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Barry Wenger	"The Jan 23, 2007 Bellingham Waterfront Lands Analysis prepared for the Port clearly demonstrates there are many acres of non-shoreline land available for non-water-oriented industrial uses now and into the foreseeable future, particularly in the adjacent, upland eight acres of the former pulp mill site. The report concludes that presently there is an adequate supply of shoreline industrial land under both low and high demand scenarios for water-oriented uses in the long term. However, removal of such shoreline areas and replacing them with inappropriate upland uses seriously erodes this state resource over time. Therefore, there is no justifiable reason to allow encroachment of non-water-oriented light industrial uses into the existing Recreation Use shoreline designation."		
18	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Barry Wenger Gaythia Weis	Approval of the use exception area will set a state-wide precedent allowing for inappropriate upland uses within shoreline jurisdiction by other ports and local governments. The cumulative impacts of such amendments would and resultant inappropriate development would be environmentally destructive and undermine the SMA.		

19	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Barry Wenger	There are no statewide-adopted criteria for size, purpose, intent, scope, standards, etc for use exception areas. Such an approach is illegal.		
20	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Gaythia Weis	The proposal to allow stand-alone, non-water-oriented uses are not consistent with the intent of the SMA which prefers shorelines be reserved for water-oriented uses including water-dependent, water-related and water-enjoyment uses to the maximum extent feasible.		
21	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Blue Green Waterfront Coalition	<p>Allowing non-water-oriented uses in any shoreline location within the WD is inappropriate and inconsistent with the SMA. The shoreline is a finite resource and as such water-oriented uses are preferred.</p> <p>The SMA establishes the concept of preferred uses of shoreline requiring that “uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon use of the sate’ shorelines...”. “Preferred uses include single-family residences, ports, shoreline recreational uses, water dependent industrial and commercial developments and other developments that provide public access opportunities. To the maximum extent possible, the shorelines should be reserved for “water-oriented uses, including water-dependent, water-related, and water-enjoyment uses.”</p>		
22	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Port of Bellingham	The WDP, development regulations and SMP amendment to allow stand-alone non-water-oriented uses in a defined and limited area within the log pond area (aka “Use Exception Area), are all consistent with the land use decision documented in the 2007 Phase 1 Whatcom Waterway Consent Decree and the 2011 amendment thereto.		
23	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Port of Bellingham	<p>Allowing stand-alone non-water-oriented uses within a limited area within the WD is consistent with the Special Area Planning section (WAC 173-26-201(3)(d)(ix)) and High-intensity environment section (WAC 173-26-211(5)(d)) of the SMP guidelines.</p> <p>The SMP designates the WD as a Special Planning Area and contains policies relating to habitat restoration, public access, job-creation and water-oriented uses (SMP 22.03(F) Waterfront District). The Waterfront District purpose statement says that shoreline mixed-</p>		

			<p>uses and non-water-oriented uses should be accommodated where appropriate. The WD and the proposed SMP amendment implement the community vision for the waterfront. The management policies of Ecology's guidelines applicable to high-intensity environments where special area planning is allowed, are satisfied by the proposed SMP amendment (WAC .173-26-211(5)(d)(ii)).</p> <p>The purpose of high-intensity environments is to <i>"provide for high-intensity water-oriented commercial, transportation, and industrial uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded"</i> (WAC 173-26-211(5)(d)). Priority should be given to water-dependent and water-enjoyment uses, however <i>"non-water-oriented uses in limited situations where they do not conflict with or limit opportunities for water-oriented uses or on sites where there is no direct access to the shoreline"</i>.</p> <p>Because the use exception area does not have direct access to the shoreline, non-water-oriented uses can be allowed consistent with WAC 173-26-211(5)(d)(ii)(a).</p>		
24	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Wendy Harris	The use exception area has been invented as a new way to allow stand-alone non-water-oriented uses which are highly discouraged by the SMA. The shoreline is a very limited resource and should be preserved for ecological function, public access and limited maritime industry. The use exception area is not consistent with the SMA or SMP.		
25	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Wendy Harris	The existing SMP does not allow stand-alone non-water-oriented uses in either the recreation or mixed-use sub-designations. The City is attempting to end run its own regulations and the SMA by creating the use exception area.		
26	Use Exception Area: 22.03.30.F.2.g 22.03.30.F.4.b(iv) 22.03.30.F.6.m 22.03.30.F.6.o 22.03.30.F.6.p.	Wendy Harris	The City provides no explanation or justification for the creation of a use exception area to allow stand-alone non-water-oriented uses.		
27	Waterfront District - 22.03.030.F	Wendy Harris	The waterfront section of the SMP had been left vague and flexible to accommodate future plans but the WDP went beyond anything that the public or Ecology had contemplated.		

28	Amendments – 22.07.020	Wendy Harris	The City has failed to allege a change in facts, circumstances or science required to revise the SMP under SMP 22.07.20. This section states that amendments can only be approved to be more consistent with the SMA or more equitable in its application to persons or property due to changed conditions in the area.		
29	SMP Inventory and Characterization	Wendy Harris	<p>Since the City conducted their original SMP shoreline inventory and analysis, three species of rockfish, and their habitat, have obtained ESA protection. Development in Bellingham Bay by the Port was specifically referenced by NOAA as a cause of harm to rockfish habitat. In addition, a recent study by Ecology indicates that Bellingham Bay has the worst sediment quality in Puget Sound due to a loss of biodiversity in the benthic community. One cause of such a decline could be shoreline development.</p> <p>The City should be required to re-evaluate its shoreline reach analysis to consider these issues and the need for mitigation.</p>		
30	SMP Cumulative Impacts Analysis	Wendy Harris	The City needs to review and potentially revise its SMP Cumulative Impact Analysis as the proposed SMP amendments will result in an increase in the type and intensity of shoreline development.		
31	General - SMA	<p>Gaythia Weis</p> <p>Wendy Harris</p>	The SMA is an important program that is the cornerstone of public citizen and state government efforts to protect the wise use of our state’s shorelines. The Department of Ecology serves as our guardians, working to ensure that the SMP is successfully implemented. The credibility of the SMP and Ecology rests on fair and consistent application of SMA provision to local planning issues.		
32	General – SMA/SMP	Gaythia Weis	“Developing Shoreline Master Programs under the Shoreline Management Act is a lengthy process involving extensive public and governmental agencies input and effort. The Shoreline Management Act and the Shoreline Master Programs developed under its provisions, recognize the need for broad scale comprehensive plans, and the importance of having smaller scale decisions fit within the provisions of these overall plans. Support for the hard work of developing and adopting Shoreline Management Programs depends on these SMPs being perceived as significant and lasting documents.”		
33	General – Public Access & Habitat	Wendy Harris	The City has ignored comments and concerns raised by the public and Ecology by siting public access areas in identical areas proposed for habitat restoration. The City has also ignored concerns from the Lummi Nation and the Washington State Department of Fish and Wildlife on issues regarding the waterfront.		
03	Log Pond	Gaythia Weis	“The log pond, while environmentally degraded from its original pristine shoreline conditions, still contains some species of ecological significance and can serve as an environmental refuge in		

			an otherwise heavily armored shoreline. It is also appreciated by local citizens as a recreational asset.”		
34	Log Pond	David Henry & Carol Fuglestad	The log pond area should be retained as a park with open green space and not be developed with buildings. Such a park would be the centerpiece of the WD much like Zuanich Point Park is to the Squalicum Marina area.		
35	Log Pond	Port of Bellingham	The log pond represents a unique land use area within the WD. Sediments within the log pond are contaminated and were capped by Georgia Pacific in 2000/2001 as part of an Interim Action cleanup under a MTCA Agreed Order with Ecology. The Port acquired the property in 2005 and entered into a Consent Decree with Ecology in 2007, and an amendment in 2011 to cleanup with site with a primary emphasis on habitat enhancement. The shallow bathymetry of the log pond is not compatible with water-dependent commercial and industrial uses. The adjacent shipping terminal site would have to be used if such developments were to operate on the upland portions of the log pond. Following cleanup actions which are scheduled to start in 2015, the log pond will consist of a soft beach suitable for both habitat and public access.		
36	Log Pond	Port of Bellingham	The existing SMP assures that there will be no net loss of ecological functions in the area. The log pond is undergoing extensive habitat redevelopment and restoration as part of the MTCA cleanup.		
37	SEPA Review (SMP)	Louann Chapman Henry Kastner Pam Borso Wendy Harris	The SMP amendments should require an environmental impact statement (EIS). The amendments will lead to an increase in use intensity and vessel traffic in an area containing federal endangered species as well as state priority habitat species. Increased intensity of shoreline use is related to a decline in ecological functions, such as habitat and biodiversity of aquatic species. A recent Ecology study indicated a severe decline in Bellingham Bay’s sediment quality, due in large part to loss of biodiversity. The city’s SEPA application lacks analysis or discussion of how the amendments will avoid such impacts.		
38	SEPA Review (SMP)	Wendy Harris	The City’s SEPA DNS overlooks important habitat impacts without consideration of the need for mitigation. The City admitted that waterfront shoreline development will have environmental impact. An earlier WD EIS stated that there would be impacts to the aquatic species due to an increase in recreational boating with development of a new marina, and these impacts would be off-set by a decrease in commercial shipping traffic. Those decreases no longer exist as a result of the proposed amendments. These new impacts on the aquatic environment were ignored when the Port issued an EIS Addendum in December of 2012. The City’s		

			SEPA application references only the EIS Addendum, so these impacts were overlooked during the SEPA review associated with the SMP amendments.		
39	SEPA Review (SMP)	Wendy Harris	The City's SEPA application admits that protected species exist within the area of the proposed SMP amendments but provides no discussion or analysis that supports their claim that there will be no wildlife impacts.		
40	SEPA Review (SMP)	Wendy Harris	Few people have actual notice of the SEPA process or understand the importance of shoreline environment designations and special use exceptions in achieving no net loss.		
41	SEPA Review (WDP)	Louann Chapman	A new comprehensive EIS should be developed for the WDP. The existing EIS consists of five documents that were developed over a five year period and review different impacts under different alternatives. The resulting document is confusing, outdated, lacks consistency and transparency and should be updated or supplemented with to facilitate an updated environmental analysis.		
42	SEPA Review (WDP)	Tip Johnson	The scope has been expanded without reopening the scoping (SEPA) process to review potential environmental concerns.		
43	SEPA Review (WDP)	Wendy Harris	The SEPA Planned Action Ordinance provides vested rights for developers who will never have to conduct new SEPA reviews that may lead to increased environmental standards.		
44	Cleanup	Tip Johnson	The amendments are designed to lower the MTCA remediation standards and save money for GP and insurance companies at the expense of public health.		
45	Cleanup	Tip Johnson	The log pond is probably receiving mercury and other toxins from the "Chem-Fix Project" of chlorinated mercury sludge mixed with concrete and from the Chlor-Alkali plant area in general. The clean-up plans are based on 35-tons of Mercury but we know that at least 400 to 600 tons were used. Where is the missing Mercury?		
46	ASB	Tip Johnson	The City has not contemplated, at least publicly, the future cost of replacing the water treatment capacity of the aerated stabilization basin (ASB). The 26-acre ASB with an approved outfall might serve multiple needs, save money and protect nearshore habitat.		
47	Process	Louann Chapman Henry Kastner	The shoreline master program (SMP) should not be amended until the waterfront district plan (WDP) is final. Making changes based on a draft WDP, which is subject to change, could lead to a need for additional amendments in the future, which would be a waste of government resources.		
48	Process	Louann Chapman	The WDP should be developed to be consistent with the existing SMP, which represents what the public agreed to after years of stakeholder input.		

		Henry Kastner			
49	Process	Louann Chapman	<p>Amendments to the SMP should be rare and are too soon as the SMP was only recently finalized. Considerable time and effort was spent by the City, Ecology and the public. The timing of the changes undermines the public process and appears suspicious.</p> <p>Nothing of material significance has changed regarding the Bellingham waterfront since the SMP was approved.</p>		
		Henry Kastner			
		Gaythia Weis			
		Pam Borso			
		Wendy Harris			
		Henry Kastner			
50	Process	Henry Kastner	The use exception area proposal was not included within the SMP public notice.		
51	Process	Gaythia Weis	The purpose of the SMP is to guide future development. The WDP should have been written in accordance with the SMP rather than amending the SMP to meet the WDP.		
		Pam Borso			
52	Process	Pam Borso	“The proposed amendments will increase the type and density of shoreline development and is inconsistent with the intent of the SMP as passed into law. This gives the appearance of the city trying to go around the law and causes loss of credibility with the public.”		
53	Process	Port of Bellingham	The Port of Bellingham (port) worked with the city in preparation of the proposed amendments to the SMP to align allowed uses, height limits, and setbacks in the log pond area with the WDP, SMP guidelines and the SMA.		
54	Process	Port of Bellingham	The WDP was jointly prepared by the port and city over an eight year timeframe with considerable public involvement. The port was also involved with the city’s SMP update process during the same timeframe. The intent of the WDP was to develop a set of compatible planning and development documents the implemented the community vision for redevelopment of the Bellingham Waterfront District. The result was the development of a new neighborhood plan, WDP, waterfront district development regulations, port comprehensive scheme of harbor improvements, a SEPA planned action ordinance, WDP development agreement and these amendments to the SMP which recognize the WD as a unique special planning area under WAC 173-26-211(d)ii)(A) and WAC 173-26-201(3)(d). These policies and regulations are intended to guide the re-development of a degraded industrial site consistent with the		

			Growth Management Act, The SMA, and the goals and policies of the city and the port, while enabling the cleanup of the Whatcom Waterway under the Model Toxics Control Act (MTCA) under a Consent Decree with Ecology.		
55	Process	Port of Bellingham	The lengthy process of both the SMP update and WDP development made it necessary to adjust both documents overtime to be consistent with one another. A preliminary WDP in 2010 proposed a large park in the log pond area, with residential mixed-use development in the adjacent uplands. This draft also proposed shoreline regulations to implement the plan as appendices. These regulations were incorporated into the 2010 draft SMP. After considerable public discussion, the draft WDP was modified and adopted by the port and the city in December 2013.		
56	Process	Port of Bellingham	The main difference between the draft 2010 WDP and the 2013 WDP is the relocation of some of the park acreage adjacent to the log pond area and the designation of the upland areas for industrial use. Both the 2010 and 2013 plans propose 33-acres of overall park acreage, over two miles of shoreline public access and clean-up/restoration of six MTCA sites.		
57	Process	Tip Johnson	The process has been intentionally revised, divided and expanded to hide environmental liabilities and to create confusion and fatigue which has driven citizens away from the process.		
58	Process	Wendy Harris	The City issued a SEPA DNS and pursued an SMP amendment after ignoring concerns raised by Ecology regarding WDP and SMP consistency and the potential for conflict between public access and shoreline restoration. It then obtained city council approval based on misleading representations that the SMP amendments were an anticipated necessity.		
59	Process	Wendy Harris	The City proceeded with a park master plan, ASB trail and over-water walkway in the Cornwall area without waiting for approval of the SMP amendments by Ecology. This was a tactical move by the City to put pressure on Ecology to approve the SMP amendments.		
60	Process	Wendy Harris	New shoreline development must comply with the SMP to meet no net loss standards yet the purpose of the proposed SMP amendments is to make the SMP consistent with the WDP. Policies and regulations have no purpose if they can be amended to accommodate development. It is the duty of Ecology to protect the integrity of the SMA/SMP process.		
61	Process	Wendy Harris	The City is conducting a piecemeal environmental review by not including the overwater walkway project proposed to connect the Cornwall park site to Boulevard Park in its review of the WDP. It is well known that over-water structures are harmful to the aquatic ecosystems and the City avoided considering this issue by treating the project as part of the South Hill neighborhood, rather than the		

			<p>WD.</p> <p>Impacts must be analyzed as part of an ecological whole rather than arbitrary neighborhood boundaries created by the City.</p>		
62	General	Pam Borso	Supports comments provided by Wendy Harris.		
63	General	Stefan Pashov & Amy Pashov	<p>“Our vision needs to be a city as a meeting place for people to exchange ideas and to be in the presence of each other and in contact with nature. This is why public spaces and parks lie at the heart of the concept of a city. They define the character of the community that we chose to live in. The way we envision cities should not be the 19th century model of a city growing around industry. Cities should not be dormitories (sic) communities attached to factories. Cities ought to be developed as intentional communities, and what shapes a city in this way more than anything else is parks and public spaces. We shape our environment and our (sic) in return our environment shapes us so we must be responsible for the choices that we are now making in planning Bellingham’s waterfront.</p> <p>These are the choices that will last for years to come. We inherited the decisions of the previous generation and now we are paying the price. Let’s pay it forward to the future inhabitants and creates something great for them. A wise plan should use the Athens, Greek model of the Forum, rather than the Industrial Revolution Dickens model.</p> <p>Remember, that some businesses can also take profit away from a community, this expensive cleanup is only one example of this.”</p>		
64	General	Port of Bellingham	The WDP and the SMP assure that visual and public access is available throughout the waterfront, including the log pond area (SMP 22.02.20.D.2.c). Regarding public access, the proposed amendments are consistent with the city’s Park, Recreation and Open Space Plan and the Port’s Scheme of Harbor Improvements.		
65	General	Port of Bellingham	“The limited amendment proposal to allow stand along non-water oriented uses within a specific limited portion of one area within the Waterfront District special planning area is consistent with and furthers the goals and policies of the SMA, Ecology’s guidelines and the SMP” (WAC 173-26-211(5)(d)(iii)(A). “The management policies set forth in Ecology’s guidelines applicable to high intensity uses, including non-water oriented uses in the limited areas are satisfied” (WAC 173-26-211(d)(ii).		
66	General	Tip Johnson	The Port historically “gamed” the SEPA review associated with the WDP to avoid consideration of the public use of the former GP water treatment system. Ecology originally objected but was forced		

			<p>to accept based on legal terms. The process has been illegitimate and against the public interest since that time.</p> <p>That one step delegitimizes all following conclusions and should be addressed before further decisions are made. Otherwise, these actions could be viewed as fraud.</p>		
67	General	Tip Johnson	<p>Decision-makers do not have an accurate understanding of the environmental problems associated with the WDP that have led to the SMP amendments.</p>		