

# **Ecology's Response to City of Olympia's Limited Shoreline Amendment Proposal**

**May 27, 2009**

**---The purpose of this meeting is to discuss our pending decision to not accept the Olympia Limited Shoreline Amendment for further review and processing. Before formally issuing our decision in a letter to the City, it is our desire to ensure that we discuss our rationale and determine that we have not overlooked key documents or letters in the City's submittal package---**

Following are the key points used by Ecology to reach this conclusion.

- Ecology cannot accept the City's limited amendment as it represents "uncoordinated and piecemeal" development of the state's shorelines in direct conflict with the fundamental purpose of the Shoreline Management Act. Processing the proposal as a limited SMP amendment at this time would be inconsistent with Ecology's rules relating to limited amendments (WAC 173-26-201(1)). Our analysis is that three of the seven criteria are triggered by the City's proposed limited SMP amendment.
- During numerous meetings with City staff since July of 2008, we voiced our concerns that the proposed amendment needed to be analyzed within the broader context of increased building heights and public access along the **entire** urban waterfront of Olympia. The amendment before us fails to analyze the affects of taller buildings within the overall context of the City's shoreline area.
- The City (together with the Thurston Regional Planning Council and the cities of Lacey and Tumwater) is currently underway with a comprehensive update of the City's SMP. This grant-funded comprehensive update is scheduled for completion by September, 2010.
- Even if Ecology were to conclude that the submittal could be evaluated as a limited amendment, minimum procedural requirements for the local process of amending the city's SMP, as set forth in WAC 173-26-100, were not satisfied.
- The materials provided to Ecology do not represent a "complete" submittal as required by WAC 173-26-110