



February 17, 2009

The Honorable Darlene Fairley, Chair
Government Operations and Elections Committee
Washington State Senate
227 John A. Cherberg Building
PO Box 40432
Olympia, WA 98504-043

Re: SB 5800 designating an additional Area of Statewide Significance
under the Shoreline Management Act

Dear Senator Fairley:

The Washington Chapter of the American Planning Association opposes SB 5800. In our view, this proposed legislation is as a misuse and misapplication of the designation of State Shorelines of Statewide Significance pursuant to the Shoreline Management Act. APA Washington does not normally comment on legislation directed at isolated or local issues. However, we feel compelled to do so in this instance because this legislation would set a bad precedent and undermine the intent and process for establishing State shoreline designations.

The property proposed for designation as a Shoreline of Statewide Significance does not match or meet the obvious standards set by those already designated Shoreline of Statewide Significance areas. The targeted Olympia isthmus area is a fully developed, man made fill area within the most dense employment area in Thurston County. It has public access along its entire length, full public access to the south along the man made dam, Heritage Park and Capitol Lake shoreline. While this area is obviously a locally important place, it is not comparable in geographic extent or environmental quality to the unique environments identified in the Shoreline Management Act as Shorelines of Statewide Significance: the Nisqually Delta, and portions of Birch Bay, Hood Canal, Skagit Bay, and Padilla Bay.

The designation sought through SB 5800 is a misuse and misapplication of the Shoreline Management Act and its processes. The proposal



appears to have little to do with shoreline designation concerns and more to do with a desire to impose additional process requirements in an area long identified for redevelopment.

The Olympia isthmus area has had an urban shorelines designation for decades, a designation which allows the highest level of development of any shoreline areas under the Shoreline Management Act. This makes sense when considered in the context of the isthmus area location within downtown Olympia, Thurston County's most dense employment area where 20,000 people come to work every day. It is also an area that has struggled to achieve a jobs-housing balance that will preserve other sensitive areas throughout the county by focusing as much growth as possible to meet GMA, State climate action and Puget Sound Partnership goals for smart growth.

Washington APA opposes SB 5800 because it would set a very bad precedent for misuse of shoreline designations, circumvents shoreline master program processes, and adds layers of process in an area awaiting the redevelopment long envisioned in the local comprehensive plan and shoreline master program.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Tovar', with a long, sweeping horizontal line extending to the right.

Joseph W. Tovar, FAICP
APA Washington
President

Members of the Senate Government Operations and Elections Committee