



Jefferson County  
**Marine  
Resources  
Committee**

**To:** Jefferson County Board of County Commissioners and Planning Commission

**From:** Jefferson County Marine Resources Committee

**Date:** October 4, 2023

**RE:** Jefferson County Shoreline Master Program Periodic Review Recommendations

Dear County and Planning Commissioners,

As requested, the Jefferson County Marine Resources Committee (MRC) has reviewed the various iterations to the update of the County's Shoreline Master Program (SMP). The MRC created a subcommittee which read the draft SMP update and developed some recommendations, approved by the MRC, for consideration by the Planning Commission and Board of County Commissioners. The following is a summary of the MRC's recommendations.

We found that the language added in the aquaculture section, largely from the Kitsap County SMP, was difficult to understand and interpret. After thorough review of these changes, this ambiguity would create a burden for both the applicant and staff at the county.

Some additions were only applicable to finfish farms and, based on the best available science, have little to no relevance to shellfish farms. The proposed process of asking the administrator to waive certain requirements also seems fraught with additional work for little benefit. We recommend that the code should clearly and unambiguously describe requirements, and that these requirements not be redundant with existing federal and state permitting requirements. A possibility might be the creation of an easy to interpret table of the requirements for ecological studies for finfish, geoduck, and other shellfish farms.

The MRC recognizes that shellfish farmers are part of the fabric of life on the shoreline of Jefferson County. Shellfish farms require clean water, and done properly, can provide valuable ecosystem services and ecological benefits. As part of a working waterfront, shellfish farms support blue economy jobs and local businesses.

In response to concerns of the residents of Shine Tidelands, who were dealing with a poorly run geoduck farm, we support strong rules to protect the marine environment (e.g., from marine debris) and permit enforcement. Permit enforcement should be well funded and straightforward for citizens to access. We also support the additional requirement of a Conditional Use Permit for new geoduck farms. Process transparency and an informed public are key.

The MRC is concerned about the change in use of the language "water-dependent" to "water-oriented." This would loosen regulations in favor of development, backsliding protections for the shoreline. Such changes may allow for restaurants and other industries, such as warehousing of goods, seafood processing plants, gravel storage, oil refineries, and log storage, etc. to qualify for development in designated Aquatic, Natural and Conservation areas.

Other concerns include a prioritization of a future home's views over maintaining recommended buffers with buffer averaging, where a "common line buffer" may "accommodate shoreline views to be adequate and comparable to adjacent residences, but not necessarily equivalent..." Buffer averaging does not protect the shoreline as well as a full buffer. Additionally, the SMP allows for development on nonconforming lots without a Variance (Modest Home Provision), stating "Single-family development, either new or replaced, on a nonconforming lot may encroach into standard buffer without a shoreline variance..." This also allows the buffer to be reduced up to 30'. Development in a non-conforming lot should not be allowed without a variance.

Thank you for your consideration of the MRC's concerns. If you have any further questions, please do not hesitate to contact the MRC ([Jeff.Co.MRC@gmail.com](mailto:Jeff.Co.MRC@gmail.com)).

Sincerely,



Troy McKelvey, Chair  
Jefferson County Marine Resources Committee

*Approved by vote of the MRC on October 3, 2023.*