

Merrill, Hannah

From: Stewart, Jeff R. (ECY) [jste461@ECY.WA.GOV]
Sent: Friday, June 03, 2011 2:28 PM
To: Lear, Cathy; Gray, Steve; Merrill, Hannah
Cc: Ehlers, Paula (ECY)
Subject: Comments on consistency review
Attachments: clallmaconsistency.docx

Hello-

I will send a hardcopy later, but wanted you to have these within your deadline.

Hope you have a fine weekend!

<<clallmaconsistency.docx>>

Jeffrey Stewart

Shoreline Specialist

Washington Department of Ecology

360-407-6521

Ms. Cathy Lear

Clallam County Community Development Department

223 East 4th Street

Port Angeles, WA 98362

Dear Cathy:

Thanks for the opportunity to comment of the Consistency Review prepared for the Shoreline Master Program Update in March of 2011. For anyone who is sincerely interested in learning about the relationship between the Shoreline Management Act, the Guidelines, and Shoreline Master Programs, reading this document closely would be very worthwhile. It appears well-organized, thoughtfully considered, knowledgeably authored, and clearly understandable.

As a foundation for bringing Clallam County's SMP up to date, the Consistency Review should serve as an excellent tool. It summarizes what is already "...on the books" and it offers insights about how well the current SMP has worked...while identifying the areas Washington State's new Guidelines at WAC 173-26 appear to require something different. In this respect, the Review document does not tell the County exactly what to do, but it does offer suggestions, and useful markers for a more efficient update process.

The format serves to introduce readers less familiar with shoreline management to some of the key tenets of the Guidelines, explaining briefly how these require more or less attention. The review does not whitewash problems nor blur the issues with ambiguous wording. Where a problem is seen, the document spells it out, adding examples so a reader can decide for themselves how the assertions are based and whether they are fair. It suggests that improvements are needed in how the new SMP will be organized, and that greater specificity will be needed to make regulations and policies more effective.

The Consultant, ESA, appears to have developed an excellent product for the SMP update process, one that is both locally particular and which documents relationships between the County and the State Law. The Environment Designation system, which is a vitally significant foundation for a useful shoreline program, is explicitly addressed. It correctly notes the relation between the current conditions of shoreline areas, how these are documented in the Inventory, and the assignment of Designations.

Specific policies and regulations that the Guidelines now require, but which the current SMP does not include, are identified. And some of the details that need to be attended are identified. It shows how use tables are generally applied as a way to summarize information and make it easy for citizens and planners to find the key requirements quickly.

I look forward to working with you as this and other products of the SMP update are completed. Please give a call if any questions arise I can help with.

Sincerely

Jeffrey Stewart

Shoreline Specialist

Washington Department of Ecology

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