

Merrill, Hannah

From: Katie Krueger [katie.krueger@quileutenation.org]
Sent: Thursday, March 04, 2010 2:25 PM
To: Merrill, Hannah
Cc: mel.moon@quileutenation.org; 'Kris Northcut'; frank.geyer@quileutenation.org
Subject: Shoreline Master Program for Clallam
Attachments: SMP-DRAFT-PublicParticipation Strategy FEB-8-2010+.pdf

Since this is a pdf, it is a bit hard to comment on. I will do my best. Thanks for sending it. Here we go. (You said you needed comments by March 8th.)

- 1) Although all the tribes in Clallam County are treaty tribes with off-reservation rights to fish, and manage the fishery and habitat, they are not mentioned in the document. I am thinking the person who drafted it just looked at state requirements and did not go beyond that. But a good document would mention the tribes and I have suggestions on a few places in that regard.
- 2) On page 2, under BACKGROUND, maybe add right after the first sentence: "In addition to these entities, several treaty tribes have fisheries co-management roles within the county and are valuable resources for resolving shoreline concerns." (Or some such, Hannah. That's the drift.)
- 3) On page 3, under the paragraph begins: "Shoreline master programs are important." You mention clearing, bulkheads, etc. I think it would be really good to mention invasive noxious weeds (which are almost always introduced by the homeowner—knotweed started as a decorative plant on homesteads!).
- 4) On page 4, at the end of the paragraph that begins with "The geographic scope...", I suggest adding something like: "It is understood that treaty tribes within Clallam County have an interest in shoreline protection in their Usual and Accustomed Fishing Grounds and Areas (U&As) as well, and should be included in discussions about plan updating." (Something like that, Hannah...)
- 5) The treaty tribes are involved in the Watershed Planning Units, Lead Entities, and MRC, but nonetheless, see my comment in 6.0.
- 6) In 6.0, PUBLIC INVOLVEMENT STRATEGIES, this strategy has sections involving every Tom, Dick and Harry, there is nothing about working with the treaty tribes. So in 6.X, maybe inserting between 6.1 and current 6.2:

"6.X Treaty Tribes. While these governments are often parties to the groups listed in 6.1 above, as separate government entities with treaty rights to the fisheries, and with co-manager roles that include fish habitat concerns, the county will consult with the treaty tribes within Clallam County on shoreline management plan language and notice them of public forums and meetings regarding the SMP."

Well, that is suggested language. I am fine with your tweaking it among your staff. You get the idea.

Thank you for the opportunity to comment.

Katie Krueger, staff attorney and policy analyst
Quileute Natural Resources
401 Main Street (deliveries); PO BOX 187 (mail)
La Push, WA 98350-0187
(360) 374-2265, FAX 374-9250, Cell 460-4842
Go to www.quileutenation.org web page--
click on our Natural Resources Fish Logo!