



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 31, 2011

Ms Cathy Lear
Clallam County DCD
223 East 4th Street
Port Angeles Wa 98362

Dear Cathy

The following comments are about The Draft Shoreline Inventory & Characterization Report (I&C), dated June 2011, for portions of Clallam County draining to the Straits of Juan de Fuca. When completed, the inventory & Characterization will bring up-to-date available information about shoreline environmental conditions, and do the same for waterfront land uses. Clallam County will have that record as a basis for updated policies and regulations in its Shoreline Master Program.

Ecology comments are focused on helping ensure that Guidelines requirements will be met, including those for public involvement in shaping the SMP update. Ecology technical reviewers were not able to conduct a focused review at this time because of other demands on their time.

Fortunately, the North Olympic Peninsula has a number of well qualified and focused research resources as well as other organizations statewide who have contributed technical review. From visiting the County's website, we recognize that many other reviewers have identified specific concerns about accuracy, especially in characterizing various locations in Clallam County, or with certain portions of the document.



Comments from the Jamestown S'Klallam Tribe and Washington State Parks, among others, appear to contain many factual points for correction as well as different perspectives to consider. We trust that corrections made to subsequent versions will reflect appropriate changes as needed from these and other reviewers' comments.

It will be necessary to exercise discernment about the specific comments where those are conflicting. Comments on the Inventory/Characterization have been provided by Futurewise, Washington State Parks, Washington Sea Grant, as well as a number of citizens who express an active interest in the SMP update process and offer perspectives of various kinds. Ecology's review of the I&C is focused on there being a reasonable and adequate level of information that characterizes current ecological functions and land uses in Clallam County.

Accuracy will of course make the Inventory a more useful and reliable planning tool. As the contents are edited for correction where needed, we encourage keeping the general sense of clarity and organization in the document as it is, because the format appears to be accessible and the content useful for a variety of land use planning purposes.

Generally speaking, the I&C appears to contain an appropriate degree of local specificity as well as a competent overview on ecological functions at a more regional level. Reach breaks and ecological functions therein are described clearly in an informative manner with references that make clear recent data has been incorporated. Topography and extent of vegetation are specified.

Ownership patterns, zoning designations, and other land use regulations that relate are spoken to in the reach specific overviews. Comments are made about the relative likelihood of future development, and limiting factors noted. Public access is characterized. Management concerns are discussed and general recommendations identified.

I think some good points were made about likelihood of increasing development of lands in some reaches, relative to what has been assumed in the past. Based on the County's awareness of local trends, I think a review to check the basis for those assumptions would be worthwhile. The same would apply to assumptions about the overlap with other regulatory systems, as was pointed out by Randy Johnson in Jamestown S'Klallam tribe comments about Chapter 7.

I think there are places where management recommendations could reasonably be made more specific. An example of this point is top of page 4-14, lines 4/5/6. It would be more helpful to identify a more specific setback distance, and note what would be safe here over what timeframe. Some good suggestions were made in some of the other reviewers' comments that should be followed up on. The specific buffer recommendations will vary according to local conditions. As has been done elsewhere, references should be made to the science basis for the recommended buffer.

My comments are deliberately brief and overarching, recognizing the I& C is a work in progress, and bearing in mind that a lot of locally knowledgeable and specific suggestions have been made previously. While general, I hope some of the perspective is helpful, and of course I will continue to be available to help with specifics as needed while the work progresses.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey Stewart". The signature is written in black ink and is positioned above the typed name.

Jeffrey Stewart

Shoreline Specialist

360-407-6521

Cc

Stephen Stanley

Peter Skowlund

Paula Ehlers