

Merrill, Hannah

From: pearl hewett [REDACTED]
Sent: Friday, March 02, 2012 12:41 PM
To: zSMP; earnest spees; sue Forde; lois Perry
Cc: Marv Chastain; Gray, Steve; Miller, Sheila Roark
Subject: EXPANDED BUFFER ZONES - SETBACKS - NO NET LOSS

TO WHO IT MAY CONCERN

This is my comment on
the Clallam County SMP draft
Pearl Rains Hewett
Trustee George C. Rains Sr. Estate
Member SMP Advisory Committee

EXPANDED BUFFER ZONES - SETBACKS - NO NET LOSS

Lake Sutherland is a perfect example of Ecology's NO NET LOSS.
With a 35 foot setback since 1976 there **is no net loss** of ecological function in Lake Sutherland.

Based on Ecology's own Characteristic and Inventory report, there are no impaired or contaminated areas in Lake Sutherland.

If there has been no net loss of ecological function on Lake Sutherland since 1976, **why is Clallam County SMP draft increasing the 35 foot setback and requiring a 50 foot setback?**

The only loss of ecological function is in the log jam at the outlet of Lake Sutherland to Indian Creek. The responsibility of maintaining/removing the debris at the outlet would be either WDFW or DNR (It is my understanding that DNR has assumed management of Lake Sutherland?)

There has been no disclosure by Ecology on the location or names of individuals involved in the impaired or contaminated sites in the SMP characteristic and inventory report.

Simply stating that there are several contaminated sites in the characteristic and inventory report on the Elwha River does not address the issue of no net loss and the need for wider buffer zones and setbacks.

Only after Ecology has identified every contaminator and the cause of every impairment on the shorelines of Clallam County, and Ecology can prove that a failure of Clallam County's existing SMP regulations, setbacks, critical areas has caused any loss of ecological function, can the Clallam County SMP and Ecology justify any increase in setbacks and buffer zones in the SMP Update.

If in fact, it can be proven that Clallam County's current SMP regulations, critical areas, setbacks and buffers zones have maintained NO NET LOSS in Clallam County from 1976 to 2011 there is no legal justification to increase any of them on the 2012 SMP Update.

Pearl Rains Hewett Trustee

George C. Rains Sr. Estate
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