

Merrill, Hannah

From: Merrill, Hannah
Sent: Thursday, March 08, 2012 5:56 PM
To: zSMP
Subject: FW: SMP update comments

From: Kaj Ahlburg [REDACTED]
Sent: Saturday, March 03, 2012 1:56 PM
To: Gray, Steve
Cc: Miller, Sheila Roark; Harry Bell
Subject: SMP update comments

Since I will be traveling again for most of April and May, Harry Bell will continue to represent PABA on the Citizens' Advisory Committee. I just want to share with you few comments on definition #232 on page 2-25 of the SMP working draft ("no net loss").

The first sentence is fine. The second sentence does not follow from the first sentence and should be revised: if NNL is defined as maintaining the "aggregate total" of the entire County's shoreline ecological functions over time you should not need "project-by-project" mitigation, but only mitigation if the project in question would cause the "aggregate total" of ecological function for the whole County shoreline to deteriorate. Under the first sentence, economic development along the shoreline should get the benefit of improvements of County shoreline habitat that occurred elsewhere (e.g., Elwha dam removal and any future restoration of Ennis Creek or the Rayonier property shoreline) when the need for mitigation is determined.

I recall being specifically told last fall by ESA Adolfson that the law does not require the updated SMP to contain any mandate for restoration projects. The last sentence runs directly counter to this assurance and needs to be modified or deleted. It otherwise will constitute yet another unfunded mandate burdening the County and "other entities" (which ones?).

Regards,

Kaj Ahlburg