



338 West First Street
Port Angeles, WA 98362
Ph: (360) 417-3452

MEMORANDUM

To: Shoreline Master Program Update, Clallam County

From: Port of Port Angeles, Jesse Waknitz

Date: April 17, 2012

Subject: Clallam County SMP Working Draft (Dated February 2012) – Comments

The purpose of this memo is to provide comments on the SMP Working Draft (Dated February 2012) provided by Clallam County at http://www.clallam.net/realestate/html/shoreline_management.htm. Original SMP Working Draft Sections and Text are shown in **bold**. Port of Port Angeles comments or recommended revisions are shown in *italics*.

Comment 1. Page 4-7; Table 4.1;

Under the Marine Shorelines Bay Environmental Designation (SED) in Table 4.1 the proposed draft buffer in row "a" should be modified from 100' to 50' to mirror the buffer found in the similar SED Modified Lowland and allow for permitted/conditional practical uses/development as is detailed in Table 5.1 of the draft SMP.

Comment 2. Page 4-34; 4.3.13 Regulations – Geologically Hazardous Area Buffers

3. **A landslide or erosion hazard buffer may be reduced by the Administrator, without a variance, based upon a finding by a qualified geotechnical engineer or engineering geologist licensed in the State of Washington which certifies that the reduction will not adversely impact slope stability. The geotechnical analysis must document the expected rate of erosion as determined through a robust erosion rate study and must consider the potential long-term impacts that could occur during the next one hundred (100) or more years. Proposals for buffer reduction *without a variance* shall also conform to the following requirements:**
 - a. **The buffer may be reduced by up to fifty percent (50%) in all shoreline environment designations except Bay, High Bank/ Rocky Shore and Priority Feeder Buff.**
 - b. **The buffer may be reduced by up to twenty five percent (25%) in the Bay and High Bank/ Rocky Shore shoreline environment designations.**
 - c. **The buffer may not be reduced in the Priority Feeder Bluff shoreline environment designation *without a variance*.**

Explanation

The addition of “without a variance” better defines that buffers may be reduced through the variance process.

Comment 3. Page 5-11; 5.5.3 Regulations Marina

9. New or expanded development appurtenant to marinas including parking, open air storage, waste storage and treatment, stormwater management facilities, and utilities shall be designed and constructed to avoid and, where avoidance is not possible, minimize impacts on shoreline functions and processes. The following standards shall apply to new or expanded development appurtenant to marinas:

a. Appurtenant structures and facilities shall be clustered and located so as to reduce clearing and grading impacts.

b. Water-oriented accessory uses reasonably related to marina operation may be located over water or near the water’s edge by conditional use permit if an overwater or water’s-edge location is essential to the operation of the use and if public access is provided.

~~c. Parking shall be located away from the water’s edge and landward of shoreline buffers prescribed by this Program.~~

c. Marina accessory parking may be located within the shoreline buffers prescribed by this Program or near the water’s edge by conditional use permit.

Explanation

The the revision to item “c” above allows for practical development that supports water dependent marinas by allowing the public to enjoy the shoreline through direct view access and sense of place.

Comment 4. Official Shoreline Map – Dungeness Bay Vicinity SED Map & Shoreline Committee Meeting #8 Power Point Presentation, Dated March 27, 2012, page 4 of 18.

The shorelands along the West Sequim Bay south of South Spit should continue to be identified as SED “Bay” to allow for future research campus development along the shorelands in currently modified pasture land. Thus preserving area native/mature trees to avoid the acceleration of erosion processes and provide high quality woodland habitat.