

Merrill, Hannah

From: zSMP
To: Merrill, Hannah
Subject: RE: Impact of and Shoreline Management Plan and requested changes

From: Glen & Joan Irwin [REDACTED]
Sent: Wednesday, August 01, 2012 2:35 PM
To: Chapman, Mike; McEntire, Jim; Doherty, Mike
Cc: Miller, Sheila Roark; Gray, Steve
Subject: Impact of and Shoreline Management Plan and requested changes

Gentlemen,

I am contacting you in regards to the current effort to revise the Clallam County Shoreline Management Plan (SMP). The following six items represent my key objections to the "Revised" SMP. I am trying to alert you to some of the issues that will be coming up during the comment and approval period later this year. In addition, I would like to enlist your influence on effecting these changes to the SMP.

1. The draft SMP designates the entire bluff facing Dungeness Bay inner harbor, from the base of Dungeness Spit East to the base of Cline Spit, as a "Priority Feeder Bluff". This designation should be changed to "Bay" (the designation of most of Sequim Bay). The reason for this requested designation change is that the bluff facing Dungeness Bay inner harbor is not a 150 ft. bluff that erodes sand at 1 - 3 feet per year. A report written by Steve Luxton, MSc., PE, Senior Geotechnical Engineer, NTI Engineering and Land Surveying, addresses this very issue and was recently provided to the SMP Advisory Committee.
2. The draft SMP imposes an arbitrary 150 ft. buffer back from the top of the bluff. No scientific or engineering justification is given. The buffer or setback should be a function of bluff height, soil composition, and recession rate to name just a few variables. Since this buffer (setback) will be, for all practical purposes, administered by the Building Permit process, it is not unreasonable to view the buffer/setback on a case by case basis, versus a blanket rule.
3. At the July 10, 2012 meeting of the SMP Advisory Committee, a complex, inadequately defined, expensive, and uncertain process to apply for a variance exception to the "150 ft." setback from the top of the bluff rule, was added to the SMP. Additionally, there is no stated methodology for measuring the setback for a structure.
4. The draft SMP imposes a designation of "grandfathered structures" (those structures currently within the proposed bluff buffer zone) as being non-conforming and would be "out of compliance". This will result in decreasing future resale value of the property. At a minimum this status of "out of compliance" will have to be declared on a future real estate disclosure form. Is the county willing to compensate those "out of compliance" property owners for the loss of property value due to this ordinance?
5. The draft SMP imposes prohibitions on rebuilding of existing structures (within the Buffer Zone) suffering catastrophic damage. This should be changed to allow for rebuilding on the same footprint subject to no change in bluff stability, distance to top of bluff and current building code requirements. This prohibition will be another factor having a negative impact on future resale value.
6. The draft SMP appears to impose onerous restrictions on property owners as it applies to landscaping and grounds maintenance of any areas within the "Bluff Buffer Zone". Property owners should not have to seek

“permission” to plant, prune, or otherwise maintain their bluff property. It will always be in property owners own interest to ensure they do nothing to alter the stability of their bluff edge.

The property owners along the North side of West Anderson Road, Inner Bay Lane, North end of Cays Road, and Marine Drive are concerned that waiting for the “final” draft document due in September/October will be too late to make any changes.

Glen Irwin

