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Sent: Monday, November 26, 2012 10:25 AM
To: zSMP
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Subject: SMP COMMENT Wildlife Habitat Conservation Areas SHALL INCLUDE

Comment on Clallam County SMP DRAFT
Pearl Rains Hewett Trustee
George C. Rains Sr. Estate
Member SMP Committee

Wildlife Habitat Conservation Areas SHALL INCLUDE
Endangered, threatened and sensitive species
SHALL REQUIRE habitat management plan (HMP)
SHALL REQUIRE a bald eagle management plan
Conservation areas are shown on the County's critical area maps.

The total of Clallam County Proper is 1,708,800 acres of land and water.
It includes 1,112,960 acres of land and 595,840 acres of water.
100% of the water is owned and controlled by Federal and State Government.

17.1% or less of Clallam County LAND is Private Property a total of **190,316 acres.**
Only a SMALL percentage (per the County) of this acreage is affected and controlled by the SMP Update.

1. Specifically, exactly what is the SMALL PERCENTAGE and exactly, how many acres of private property are affected, restricted and controlled by the Clallam County SMP Update?

2. WHAT % of Clallam County proper is left for a TAX BASIS?

3. With well over a **MILLION ACRES of protected, restricted, controlled, non-accessible public land, why should ANY additional private property be taken for Wildlife Habitat Conservation Areas?**

b. Priority habitats not classified as Class I may include wetlands, aquatic conservation areas, marine bluffs, stream ravines, caves, cliffs, islands, meadows, old-growth/mature forest, snag-rich areas, talus slopes, urban natural open space, and those land and water areas identified as significant habitat corridors under the Clallam County Comprehensive Plan, Clallam County Code Title 31.

4. With all of the above, and the setbacks, what percentage of Clallam County private property is left to develop?

Read on if you are concerned.

4.3.10 Regulations – Class I and II Wildlife Habitat Conservation Areas Designation and Mapping

1. Designation: **Class I Wildlife Habitat Conservation Areas** shall include the following:

a. Habitats recognized by federal or state agencies for federal and/or state listed **endangered, threatened and sensitive species** documented in maps or databases available to Clallam County and its citizens and which, if altered, may reduce the likelihood that the species will maintain and reproduce over the long term. This includes known **locations of nests, rookeries, or other breeding areas for species of concern** recognized by local, state, and federal public agencies having jurisdiction over such species.

b. **Habitats targeted for preservation** by federal, state, and/or local government which provide fish and wildlife habitat benefits, such as important waterfowl areas identified by the U.S. Fish and Wildlife Service.

2. **Designation: Class II Wildlife Habitat Conservation Areas shall** include the following:

a. Priority habitats not classified as Class I for state listed candidate and monitor species documented in maps or databases available to Clallam County and its citizens, and which, if altered, may reduce the likelihood that the species will maintain and reproduce over the long term.

b. **Priority habitats not classified as Class I may include wetlands, aquatic conservation areas, marine bluffs, stream ravines, caves, cliffs, islands, meadows, old-growth/mature forest, snag-rich areas, talus slopes, urban natural open space, and those land and water areas identified as significant habitat corridors under the Clallam County Comprehensive Plan, Clallam County Code Title 31.**

3. Mapping: The approximate **location and extent of Class I and II habitat conservation areas** are shown on the County's critical area maps. These maps are to be used as a guide and do not provide a definitive critical area designation. The County shall update the maps as new wildlife habitat conservation areas are identified and as new information becomes available.

4.3.11 Regulations – Class I and II Wildlife Habitat Conservation Areas Protection Standards

1. Class I Wildlife Habitat Conservation Areas: All development within the jurisdiction of designated Class I wildlife habitat conservation areas **shall** adhere to the following standards:

a. New uses and development on sites **with known locations of Class I wildlife species or sites adjacent to known locations of Class I wildlife species shall require a habitat management plan (HMP)**. The HMP shall meet all of the following requirements:

i. The HMP shall identify how the development impacts Class I or II wildlife habitat conservation areas. In the case of bald eagles, a bald eagle management plan approved by the Washington Department of Fish and Wildlife and meeting the requirements and guidelines of the bald eagle protection rules (WAC 232-12-292), as now or hereafter amended, shall satisfy the requirements for an HMP.

ii. The HMP shall contain a map prepared at a readable scale showing: the location of the proposed development site; the relationship of the site to surrounding topographic, water features, and existing and/or proposed building locations and arrangements; and a legend which includes a complete legal description, acreage of the parcel, scale, north arrows, and date of map revision.

iii. The HMP shall describe the nature and intensity of the proposed development; an analysis of the effect of the proposed development, activity or land use change upon the wildlife species and habitat identified for protection; and a plan which identifies how the applicant proposes to avoid, minimize and/or compensate for any adverse impacts to wildlife habitats created by the proposed development.

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