

Merrill, Hannah

From: zSMP
To: pearl hewett
Subject: RE: NO NET LOSS OF ECOLOGICAL FUNCTIONS AND CUMULATIVE IMPACT ANALYSIS

From: pearl hewett
Sent: Thursday, February 28, 2013 9:42 AM
To: zSMP
Cc: yellowbanks; info@justwateralliance.org; Norman MacLeod; robertc; Karl Spees; Brian and Brooke; notac@olypen.com; Sandy Rains; judymiller; Vi; joni howard; Miller, Sheila Roark; Delane Hewett; McEntire, Jim; Chapman, Mike; Lois Perry; Sue Forde; Rick Forschler; Frank M Penwell; Ross Krumpe; Jay Petersen; harry bell; Van De Wege, Rep. Kevin; Hargrove,Jim; Don; Tristin Hewett; connie beauvias
Subject: NO NET LOSS OF ECOLOGICAL FUNCTIONS AND CUMULATIVE IMPACT ANALYSIS

**This is my SMP comment on
Memorandum Dated Feb 22,2013**

From: ESA
Subject: Draft Cumulative Impact Analysis and No Net Loss Report
Pearl Rains Hewett Trustee
George C. Rains Sr. Estate
Member SMP Update Committee

TO WHOM IT MAY CONCERN

NO NET LOSS OF ECOLOGICAL FUNCTIONS AND CUMULATIVE IMPACT ANALYSIS

Based on this DRAFT document, we shall conclude, that ESA has determined that
ANY AND ALL DEVELOPMENT IN CLALLAM COUNTY IS A THREAT
based on the ESA Draft Cumulative Impact Analysis and No Net Loss Report.

THE OUTRAGE OF THIS ENTIRE DOCUMENT IS THAT WHEN THE CLALLAM COUNTY SMP UPDATE IS COMPLETED, ALL RESIDENTIAL DEVELOPMENT SHALL BE UNDER TOTAL GOVERNMENT CONTROL.

THE ESA THREATS SHALL BECOME A MOTE POINT.

ANY DEVELOPMENT THREAT to ecological function and the cumulative impact of residential development from the **3300** PRIVATE PROPERTY OWNERS IN CLALLAM COUNTY, THAT OWN UNDEVELOPED PROPERTY AND /OR LIVE IN PRIVATE HOMES ON THE NARROW RIBBON OF LAND?

SHALL BE UNDER TOTAL CONTROL WITH THE PASSAGE OF THE DOE SHORELINES MANAGEMENT ACT IN CLALLAM COUNTY.

AND, ADDITIONALLY, ALL PRIVATE PROPERTY OWNERS SHALL BE REGULATED AND CONTROLLED BY CLALLAM COUNTY DEPT. OF COMMUNITY DEVELOPMENT.

The number used, as 3300 AFFECTED Private property owners by the SMP UPDATE will be exponentially increased with the designation and addition of WETLANDS IN CLALLAM COUNTY.

SHALL A REASONABLE PERSON UNDERSTAND OR BE PERSUADED OF THE **THREAT?**
IN the following scientific text description of the rational used by ESA in preparing the Draft Cumulative Impact Analysis and No Net Loss Report?

TO ASSESS THE **THREAT** POSED BY NEW DEVELOPMENT....

ESA CONSULTANTS/compliance experts wrote
WE considered, We specifically evaluated, we considered, assuming, we assumed only, we assumed that, we attempted to be accurate, it is difficult to get a precise estimate of development (**THREAT**) potential without detailed knowledge, (Note: all numbers are approximate)

Most use and development have the **POTENTIAL TO THREATEN** ecological functions **TO SOME DEGREE**. The nature and the severity of the **THREAT** will depend on several factors.

To assess the **THREAT** posed by new development....
We considered, We specifically evaluated, we considered, assuming, we assumed only, We assumed that, we attempted to be accurate, it is difficult to get a precise estimate of development (**THREAT**) potential without detailed knowledge, (Note: all numbers are approximate)

We used available data, we assumed, we reasoned, we conservatively assumed, this is likely a gross over- estimation...
Data is scant, so we assumed, we assumed, in reality the likely hood....
We assumed, we suspect, we assumed all, we assumed there...
(Note: all numbers are approximate)

We evaluate for new development (**THREAT**) using FEMA maps
These maps are not comprehensive
With no mapped floodplains
Where potential for floodplain migration has not been assessed or documented
Floodplain maps have know inaccuracies
Channel migration maps coarse scale planning maps

NONETHELESS, WE USED THESE DATA SETS TO IDENTIFY UNDEVELOPED PARCELS LOCATED WITHIN THE MAPPED FLOODPLAINS.

The level of **THREAT** is difficult to assess

I shall object to the use of the word **THREAT** in relationship to future residential development

THERE SHALL BE NO **THREAT** TO THE NET LOSS OF ECOLOGICAL FUNCTION BY RESIDENTIAL DEVELOPMENT WHEN THE CLALLAM COUNTY SMP UPDATE IS COMPLETED.

THREAT by definition

1. **THREAT** THE DECLARATION OF INTENT TO CAUSE HARM
INTENT

something planned, or the purpose that accompanies a plan

THREAT THE EXPRESSION OF AN INTENTION TO CAUSE HARM OR PAIN
INTENTION

something that somebody plans to do

NO NET LOSS TO ECOLOGICAL FUNCTIONS?

THE ESA **THREAT** OF LOSS?

Table of Content

4.0 **THREAT** to shoreline function

5.0 Where In Clallam County are **THREATS** most prevalent?

6.0 How does the draft SMP address identified **THREATS**

Figure 4.1 Common **THREATS** associated with residential development

Table 5-10 Summary of development **THREATS** for each analysis area - Marine Shoreline

Table 5-11 Summary of development **THREATS** for each analysis area - Freshwater Shoreline

1.3.1 Relationship to Puget Sound Recovery Efforts line 31

Strategies and actions that reduce **THREATS** to the ecosystem caused by

Puget Sound Recovery

Page 5 line 17. major **THREATS** to maintaining or improving or the components

Table 1.1 Key Questions

What are **THREATS**? ... **THREATS** are the physical or biological.....

Where are **THREATS**?... **THREATS** are most prevalent that have the highest development...

Where might **THREATS**?...

2.0 No Net Loss as a vision and goal

Page 10 line 4.- 2. identifying **THREATS** to shoreline ecological functions (chapter 4)

4.0 **THREATS** to shoreline functions

most use and development have the **POTENTIAL TO THREATEN** ecological functions **TO SOME DEGREE**. The nature and the severity of the **THREAT** will depend on several factors.

Table 4.1 Qualitative assessment of **THREATS** proposed by major types of Shoreline use and development

QUALITATIVE

relating to or based on the quality or character of something, often as opposed to its size or quantity

(12) Rational of Qualitative **THREAT** assessment related to type of development or use

4.1 Aquaculture level of **THREAT** is difficult to assess

4.3 Residential Development

line 5-6 the specific types of **THREATS** that are expected in Clallam County include line 7- 11.

Specific nature of **THREATS** lines 1-2 page 44

Figure 4.1 Common **THREATS** associated with residential development and linkage to shoreline attributes. describing (7) shoreline attributes.

5.0 Where in Clallam County are **THREATS** most prevalent?

THREATS Lines 2,4,5,6,8,11

5.1 potential for new development

THREATS Line 31,32

Based this documentation we shall conclude, that
ANY AND ALL DEVELOPMENT IN CLALLAM COUNTY IS A THREAT
IN the ESA Draft Cumulative Impact Analysis and No Net Loss Report.

TABLE 5-2 marine reaches with potential new development (**THREAT**)

There are 18 Marine reaches the primary anticipated future use /development potential is residential.

Table 5-3 Freshwater reaches with development potential (**THREAT**) WIRA 17,18,19

There are 40 reaches the primary anticipated future use /development potential is residential.

5.2 Amount of New development

line 3. To assess the **THREAT** posed by new development....

WE considered, We specifically evaluated, we considered, assuming, we assumed only, we assumed that, we attempted to be accurate, it is difficult to get a precise estimate of development (**THREAT**) potential without detailed knowledge, (Note: all numbers are approximate)

5.3 Effect of proposed buffers on existing and new development

line 19,20,21 Development that occurs landward of protective buffers is presumed to pose less of a **THREAT**

TABLE 5.4

Line 3 Two areas have high potential for new development (**THREAT**)

TABLE 5.5 New development(**THREAT**) would be constrained by buffers

5.8 Impact from New shoreline modifications

we used available data, we assumed, we reasoned, we conservatively assumed, this is likely a gross over-estimation...

Data is scant, so we assumed, we assumed, in reality the likely hood....

we assumed, we suspect, we assumed all, we assumed there...

(Note: all numbers are approximate)

5.9 Impacts from development in floodplains and channel migration

We evaluate for new development (**THREAT**) using FEMA maps

these maps are not comprehensive

with no mapped floodplains

where potential for floodplain migration has not been assessed or documented

floodplain maps have know inaccuracies

channel migration maps coarse scale planning maps

NONETHELESS, WE USED THESE DATA SETS TO IDENTIFY UNDEVELOPED PARCELS LOCATED WITHIN THE MAPPED FLOODPLAINS.

TABLE 5.10 Summary for development **THREATS** Marine Shorelines

(15) analysis areas

TABLE 5.11 Summary for development **THREATS** Freshwater Shorelines

(9) analysis areas

5.10 Potential loss of functions and restoration marine shorelines

line 11-12 New development has the potential to **THREATEN** if not carefully planned and designed

line 21 There is a limited **THREAT** to marine shorelines

Table 5.12

page 78 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 79 **THREATS** associated with anticipated development

page 80 Necessary restorations to account for **THREATS**

THREATS associated with anticipated development

page 81 Necessary restorations to account for **THREATS**

line 14, 15 New development has the potential to **THREATEN** if not carefully planned and designed

page 82 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 83

line 36 New development has the potential to **THREATEN** if not carefully planned and designed

page 85 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 86 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 88 New development has the potential to **THREATEN** if not carefully planned and designed

page 89 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 90 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 91 New development has the potential to **THREATEN** if not carefully planned and designed

page 92 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 93 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 94 There is a limited **THREAT** to marine shorelines

page 95 New development has the potential to **THREATEN** if not carefully planned and designed

page 96 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 97 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 98 New development has the potential to **THREATEN** if not carefully planned and designed

page 100 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 102 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 104 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

5.11.1 freshwater reaches with limited **THREAT**

page 105

line 18 opportunities that are appropriate to alleviate identified **THREATS** from cumulative impacts

page 106 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 108 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 109 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 110 **THREATS** associated with anticipated development

page 111 Necessary restorations to account for **THREATS**

THREATS associated with anticipated development

Necessary restorations to account for **THREATS**

page 112 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 113 **THREATS** associated with anticipated development

page 114 Necessary restorations to account for **THREATS**

page 115 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

page 116 **THREATS** associated with anticipated development

Necessary restorations to account for **THREATS**

6.0 HOW DOES THE DRAFT SMP ADDRESS IDENTIFIED **THREATS**?

is designed to identify potential **THREATS**

I shall object again to the use of the word **THREAT**

THREAT by definition

1. **THREAT** THE DECLARATION OF INTENT TO CAUSE HARM
INTENT

something planned, or the purpose that accompanies a plan

THREAT THE EXPRESSION OF AN INTENTION TO CAUSE HARM OR PAIN
INTENTION

something that somebody plans to do

6.1 MITIGATION??? (left for another day)

IF YOU ARE REALLY INTERESTED IN THE REST OF THE **ESA THREATS?**
GET A COPY AND READ IT YOURSELF!