

Merrill, Hannah

From: zSMP
Subject: RE: OEC comments on Draft Clallam Co. CIA/NNL

From: Darlene Schanfald [REDACTED]
Sent: Thursday, March 14, 2013 11:06 AM
To: zSMPC; Merrill, Hannah
Subject: OEC comments on Draft Clallam Co. CIA/NNL
Importance: High

I'm submitting these comments for the Olympic Environmental Council on the CIA/NNL

The document is clearly written and easy to read and digest. Great details.

However, it is hard to comment without seeing the March (?) April (?) 2013 SMP draft.

The sequencing of documents released are not conducive to align or make relevant comments. The CIA/NNL is NOT responsive to many needed changes submitted on that last SMP draft. I'm not sensing changes have been made, based on the CIA/NNL. Some CIA/NNL language concerns may be resolved in the next SMP draft. But if the CIA/NNL is an indication, I'm not hopeful.

It would be good to have an updated list of SMP changes that were made along with the CIA/NNL, even if the March/April draft is not ready.

Governor Inslee's Climate Change Plan passed the Senate and will likely pass the House. Will we be looking at the legislation and seeing how to fold it in to the SMP? There is weak SMP language in the CIA/NNL, including the last bullet on P. 141.

There is plenty of information released about climate change and such language should be incorporated and discussed in the SMP and the CIA/NNL.

Page 39. Line 2. "threatened" should be "threaten."

P. 40, Commercial/Industrial Rationale, line 4. Delete second "the". Should read..future under the County's current...

There may be development if Battelle Labs increase and with the John Wayne planned housing/resort.

P. 41. \$.1 Aquaculture, para 3. "distance" is not the problem with aquaculture. This paragraph needs a good rewrite.

P. 53 Diamond Pt Where would there be room for more building? Facing Discovery Bay, the shoreline is house-to-house? In the western part, how many properties are left to be built upon? Or are you looking at other sections that are not Diamond Point proper, such as Sunshine Acres?

P. 56, line `5. Did you mean RCC5 instead of RRC5?

P. 61, Table 5-7. Should the title start with Vacant parcels, rather than Existing Development?

P. 71, line 5. Put a comma after "comprehensive".

P. 78. What is a "pile wall?" (Identified Restoration Opportunities: Remove pile wall at Eagle Creek.)

P. 177. Line 12, Uses and developments (insert) "to" avoid...

Lines 19-21 Property owner should have to put up a bond for potential damage to ensure the public is not left with damage costs.

Line 26. Put a comma after "occur".

Line 27. if impacts are unavoidable, the project should not go forth.

P. 124. Line 12-15. Here is an example of early concerns addressed by some Committee members, yet seemingly ignored. "The Adm'r may approve a greater area or amount of clearing..." Just by submitting such a plan by such a "qualified" party, should not equate to approval for clearing more. I recognize the word is "may," but that doesn't satisfy the concern that the means justifies the end.

Line 30. Again, Committee members voiced disapproval of "buffer averaging," which seem to have been ignored.

P. 125, line 26 Delete the "s" from "shorelines and place the "s" after development to read "shoreline developments."

P. 126. Private pathways, summary of potential threat. Did you mean not pervious pavement or (yes) pervious pavement?

Public trails and public access improvement. Would this include horse trails along the coasts?

Under Summary of Potential Threat,

"...without causing significant impact and the impacts are offset by the benefits provided." This is unclear. For instance, what would be the continual repair costs over time of a "benefits provided" trail that is wrongly sited and means continual armoring replacement? This passage needs better detailing.

P. 128, Geologically Hazardous Areas, Standard Buffer. Is a 50 ft buffer sufficient?

P. 129, Frequently flooded areas, New land divisions containing frequently flooded areas...

These should not be allowed.

Further down in that section, "Cumulative effect of existing and anticipated development should..." It should read "shall."

P.130 Critical Area (SMP section) CARA. Again, bonds should be put up for potential natural resource damages. The County should have, in writing, a hold harmless agreement. This is not just a matter of protecting the county, but also protecting the County citizens from liability.

P. 131, line 13. delete the semi colon (;) after "water" and replace it with a comma (,).

Line 18. Place a period (.) at the end of the sentence.

P. 132, line 37-38. Why should pre-1992 residences be allowed waterward encroachment?

P. 133, line 3. Replace "preferred" with "required".

- P. 134. Line 28-30. If the County doesn't see a gain in shoreline ecological functions, what will the County do about it?
- P. 140. 7.2 Tracking and Responding to Development Actions. What are the enforcement tools? It would be good to list them here.