

From: Jamie Michel
Sent: Thursday, February 05, 2015 11:16 AM
To: zSMP
Subject: Updated Draft SMP Comments from Coastal Watershed Institute

To the Clallam County Planning Commission,

I am writing to provide comments on the updated draft SMP from Coastal Watershed Institute. Coastal Watershed Institute has been working with the community and scientists for two decades to understand how Strait of Juan de Fuca coastal systems work.

Specifically, we would like to recognize and provide thanks for your efforts to increase the buffer setback to 150 feet for new development on feeder bluffs. Feeder bluffs provide the material that creates the iconic beaches of the Strait, in addition to provide material that supports habitat for hundreds of species of birds and fish and land and marine mammals. These landforms are incredibly unstable, and given the high erosion rates, a 150 foot setback will provide approximately 100 years until bluff encroachment threatens new structures. While a 150 foot buffer is an improvement, we recommend a 200 foot buffer for structures over 1,000 square feet. A recent Department of Ecology publication states that highly erosive feeder bluffs need to be 1. Preserved and 2. Restored. Development closer than 200 feet from the bluff edge compromises feeder bluffs and does not follow guidance set forth by the Department of Ecology.

The current lifespan of many homes built along Strait of Juan de Fuca feeder bluffs in the 1970's is approximately 40-50 years. These homes are now within feet of the bluff edge and we as a community will harbor the economic and ecological impacts of homes falling over the edge. To help plan for the costs of moving infrastructure out of bluff retreat zones, We would like to suggest that the County consider implementation of a Conservation Futures program or a bluff taxing district in which a percentage of the sale of a home located on a feeder bluff would fund an account that will be used to eventually move that home out of harms way. We would also support tax incentives for landowners who voluntarily develop with a larger buffer. 'Soft armoring' techniques that are used to stabilize other lower energy shoreline areas of Puget Sound don't work for high bluffs of Clallam County.

The 150 foot buffer is an absolute minimum and should not be exempted or buffer averaged. The geologic erosion rate of feeder bluffs has recently been documented to be ~1.5 feet per year on average with single failure events removing as much as 20 feet. Anything built closer than 150 feet that is not easily removable should not be permitted-no exceptions, no exemptions.

Lastly, it makes absolutely zero sense to permit new development on a grandfathered surface within the 150 foot buffer zone unless the structure is built on wheels and can be readily removed at minimal cost.

Thank you for your consideration,

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