

From: Susanne Scott
Sent: Wednesday, February 11, 2015 3:15 PM
To: zSMP
Subject: My comments on the proposed SMP

I do want to thank the Planning Commission, county staff, and the County Commissioners for all their hard work based on science and meeting the requirements of the 2003 Ecology Guidelines.

The WA State Shoreline Management Act has three (3) purposes:

- Protect shoreline and natural resource functions and protect against a net loss (No Net Loss/NNL).
- Provide public access to shorelines.
- Allow water dependent uses.

SETBACKS

A 200 ft setback is the safe setback to protect homes from failing bluffs for a 75 year period, as well as

homes along shorelines that could experience sea level rise and stronger wave action over this period. The

Shoreline Management Act's jurisdiction is 200 ft from the mean high water mark, which will change over

time, for new buildings and major building remodels. Clallam County's Shoreline Master Plan should adopt

the 200 ft setback.

I recommend the following language to protect property owners:

1. Disallow new building or remodeling within 200 ft. of the high water mark. This is in light of studies

showing the past erosion rate of our bluffs, and the increasing erosion rate of beaches.

2. Officially notify all property owners who own land covered by the SMP that their property is subject

to any additional constraints of the SMP.

3. Add the requirement that all buyers of property covered by the SMP will be notified that their property is covered by the SMP, which has specific restrictions on their building options, prior to purchase.
4. Before a permit is granted, require those intending to build in the SMP covered area attend a meeting outlining the special requirements of the SMP.
5. Disallow variances for single family residents to expand into buffers, critical areas and wetlands.

AQUACULTURE

Both fin fish farms in the open waters and industrial sized shellfish (including geoducks) projects bring a number of

harmful pollutants as well as a variety of impacts to large and minute (e.g. sand) animals. The WA

State Department of Ecology, NOAA, the USEPA and other agencies are all promoters of these industries for economic purposes, although the economic benefits are for the owners of these projects and the pollution, once done, is done as these owners move on to new and unpolluted sites

to begin again. Municipalities and communities are pushing back in the courts.

I recommend the following language for the Clallam County Draft Management Plan:

1. Establish a moratorium on new aquaculture until the current pending court cases are resolved, to

avoid the duplication of costly litigation for Clallam County.

2. Change wording when considering new or expanded aquaculture from “best management practices” to “best available current science.”

3. Fin fish project shall be sited upland. Disallow fin fish fin pens from the SMP plan area and in

water. Penned farms in open waters pollute bottom lands and wildlife.

BEACH ISSUES — MINING, JETTIES, RIPRAP, WALLS

We are trying to protect, not destroy the beaches. Beaches are our commons and important to marine life. Mining for sale or mining to nourish a beach elsewhere damages the beach and surrounding ecosystems from where they are extracted. Research shows that “beach nourishment” is

a bandaid and unstable; that the transported beach materials can wash away with one or a few big

waves. Further, moving beach sources from one beach to another for restoration purposes may further harm the receiving beach if the beach materials of both sites do not exactly match.

The following is recommended language:

Protect beach integrity by:

1. Disallow beach mining - the removal or transfer of natural beach materials.
2. Disallow the erection or expansion of hard structure barriers, i.e. jetty's, walls, break-walls,
3. These actions create beach loss and dependent marine life. No Net Loss should rather be NO bouldering on shores. These artificial structures set up changes in natural beach architecture, increase wave energy, and effect further erosion beyond the structures — i.e., kick problems down the road, so to speak.

LOSS. Include this wording in the Plan: “Any mitigation shall be in light of no net loss for the property or properties under consideration and those nearby”

Global climate change is clearly upon us, with the early impacts being felt around the world and here in Clallam

County. Our temperatures are rising, our snowpack is receding, glaciers melting, flooding has increased and

our regional sea level is rising. All of these will have a significant impact on our shorelines, infrastructure, water

supplies, and our human health. Clallam County should prepare for climate change with regard to its SMP.

· Therefore, we strongly urge the Planning Commission to reschedule its recommendations to the County

Commissioners so that it can incorporate the findings of the Planning for Climate Change on the North Olympic

Peninsula – an ongoing effort funded through the North Olympic Peninsula Resource Conservation &

Development Council (of which Clallam County is a member), is due in draft form 6/30/15 and in final 8/31/15.

· Please delay final recommendations until we have the results of this study is essential to avoid future

damages and remedies which are sure to prove far more costly than the current cost of planning for the future.

· Throughout Chapters 2, 3, 4, 5, and 6, the phrase "potential adverse impacts related to climate change"

needs to be added to the list of hazards property owners "SHALL" be made aware of, and design standards to

address climate change shall be added where appropriate.

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Sue Scott

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Being Wholehearted is about being Real:

"You become. It takes a long time. That's why it doesn't often happen to people who have sharp edges, or who have to be carefully kept. Generally, by the time you are Real, most of your hair has been loved off, and your eyes drop out, and you get loose in the joints and very shabby. But these things don't matter at all, because once you are Real, you can't be ugly, except to people who don't understand."
"The Velveteen Rabbit" by Marjorie Williams