

18 February 2015

To: Clallam County Planning Commission

SUPPLEMENTAL COMMENTS from Olympic Environmental Council and from Friends of Miller Peninsula State Park.

At the Sequim Public Hearing, comments were submitted on the DRAFT SMP on behalf of the Olympic Environmental Council and for Friends of Miller Peninsula State Park. Below are supplemental comments.

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, and likely will, experience sea level rise, increased wave energy, and flooding over this period. The Shoreline Master Program's jurisdiction is 200 ft from the mean high water mark, which will change over time due to sea level rise, for new buildings and major building remodels. Clallam County's Shoreline Master Plan should adopt the 200 ft setback.

Recommended language to protect property owners:

1. Disallow new building or major 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, sea level rise, increased wave action strength and flooding.
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

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. (Refer to the written comments submitted at the Sequim Public Hearing.)

BEACH ISSUES – MINING, JETTIES, RIPRAP, WALLS

Value the beach ecosystem. We should not try to engineer it. We are trying to protect, not destroy the beaches. We need to create, not lose beaches. Marine life and micro and macro beach life, in and out of the water, are dependent on clean, safe beach sand. Quality beaches are our commons and protect marine life. Beaches are tsunami protectors and help protect us from flooding and high waves. Mining for sale or mining to nourish a beach elsewhere damages the beach and surrounding ecosystems from where they are extracted. Research shows that worldwide, “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. And removing sand can cause higher salinity upstream.

The following is recommended language: Protect beach integrity by:

Disallow beach mining - the removal or transfer of natural beach materials.

Disallow the erection or expansion of hard structure barriers, i.e. jetty's, walls, break-walls, riprap or anything comparable 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.

Value the beach ecosystem. No Net Loss should equal NO LOSS no each area. 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.” This is different than taking from one, ruining it by “mitigating” something miles away. In fact, both sites can be ruined.

Submitted by Darlene Schanfald