

Sent: Thursday, February 26, 2015 10:32 PM

To: zSMP

Cc: Dean&Judy

Subject: Protect the Peninsula's Future SMP Update Comments for the Record

PROTECT THE PENINSULA'S FUTURE P. O .Box 1677, Sequim, WA 98382

<PROTECT THE PENINSULA'S FUTURE SMP UPDATE COMMENTS>

Protect the Peninsula's Future (PPF) is a nonprofit public benefit corporation registered in Washington State since 1973 and dedicated to environmental protection, so as to enhance the quality of life for present and future citizens of the North Olympic Peninsula.

Included in PPF's efforts to monitor various public agencies regarding proposed land and water uses that could impact our environment has been participation by a member of its board in the Shoreline Management Program Update Citizens' Advisory Committee. The ESA consulting group and County staff are to be congratulated for efforts to present valuable information and utilize inputs from a wide range of community interests. The Planning Commission members are also thanked for contributing many hours for attending forums, Public Hearings and for the reading of record comments in developing their recommendations for the Board of Commissioners for this important Update.

As the PPF delegate to the committee whose meetings I attended in 2012-13, I appreciate the opportunity to summarily provide comments on the November 2014 draft, which I reviewed online. I also have had opportunity to review comments submitted by Futurewise, Olympic Climate Action, Sierra Club (NOG) and Olympic Environmental Council.

For the record, I will note that while this PPF delegate will not be providing section by section specific suggestions for language/wording changes, those corrections/alterations noted by the above cited groups have been well considered and are endorsed as consistent with PPF values. Especially valuable are those comments pertaining to having property records note any/all associated shoreline risks. Also, the Sierra Club/NOG comments for using most current BAS (per WAC 173-26-201(2)(a) –i.e. for determining/monitoring setback requirements over time) must be included. The Futurewise inclusion of David Park's 6/2014 study gives evidence of the need for ongoing monitoring and adaptive management strategies. PPF supports that the Planning Commission withholds its recommendations until projected climate change impacts for our peninsula (report eta per OCA ~ summer 2015) and until the Bainbridge Island court case outcome (referenced by OEC) are known.

Some final comments from this committee delegate are listed briefly.

* This committee member AND others expressed concerns and disappointment that the original 12 proposed SEDs (2/2012) which were based on ecological functions were changed to 6 SEDs (8/2013)

that are based on prior human land usage. (This seems inconsistent with the DOE ostensible justification for having the SMP update with NO NET LOSS of ecological function as a major goal.)

* For all SEDs where fin/shellfish/geoduck farming may be allowed, a Substantial Development Permit must be used in order that Clallam County shall have final jurisdiction. In addition, any determination of NNL must be verified by an EIS, plus ongoing monitoring to assure NO cumulative impacts occur IF "development" approved after initial EIS provided.

* General Policies should be before Specific and must have verifiable consistency.

* Any word included in definitions section should be underlined/linked so reader knows clarification is immediately available.

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PPF will continue to support protection of our environment in the public interest and looks forward to appropriate response to these and others' comments regarding a proposed Update.

Submitted February 26, 2015

by Judy M. Larson, PPF Board Member

on behalf of Protect the Peninsula's Future

(E-mail confirmation of receipt of these comments would be appreciated.)