

Feb. 27, 2015

Clallam County Planning Commission and Department of Community Development

223 E. 4<sup>th</sup> St., Ste 5.

Port Angeles, WA. 98362

Re: Comments: Draft Shoreline Master Program.

Dear Planning Commission Members and Department:

Thank you for your work to date on up-dating the County SMP. I appreciate the opportunity to submit comments.

While serving as a county commissioner during the past decade I had the opportunity to sit on several State climate change advisory committees. This experience increased my awareness of the vulnerabilities of Clallam County to climate change impacts. The Draft SMP must be strengthened in addressing climate change impacts.

I support the comments and concerns submitted by the Olympic Climate Action (OCA) organization. I have been a member of this local group for over a year and attend most of the monthly meetings. I can attest to the serious concerns related to climate change that this group discusses regularly and reflect in their comments.

Among the specific requests incorporated in the comments of OCA is that the County Planning Commission and DCD staff consider and reference available scientific studies and reports in the SMP, possibly in an expanded appendix. Several such resources are cited in the OCA comments. One of the reasons to include such references, would be to anticipate litigation, wherein the County would be defending the up-dated SMP. Another reason would be to anticipate a developing area of the law, wherein local governments are being held liable for not disclosing to local property owners (or potential owners) known natural resource hazard areas. It is anticipated that the OSO landslide litigation will extend this legal theory further as it will apply to Washington State and local governments.

I also support the comments submitted (2/25/2015) by the North Olympic Group of the Sierra Club. Additional scientific studies are cited in those comments and should be referenced by the County for the reasons cited above.

In Chapter 3., the section on "Oil, Gas and Natural Gas Transmission" should be completely rewritten to address the potential risks of oil spills to the shorelines of Clallam County. While the industry has improved its safety record, a large oil spill can occur at any time and the County should more adequately address prevention, response, clean-up and damage assessment issues. As the recent Vessel Traffic

Risk Assessment study well documents, the likely-hood of measureable increases in spill are reasonable to assume as proposed energy projects are approved in the Salish Sea region. In the permit processes utilized to date, proposals are not analyzing the risks of increased “bunkering” likely to occur in the Port Angeles harbor for example. Responses to spills of proposed new cargoes, such as diluted bitchimun, are not addressed.

Thank you for the opportunity to submit comments.

Mike Doherty

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