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From: Richard Bloomer

Sent: Friday, February 27, 2015 8:51 PM

To: zSMP

Subject: SHORELINE MASTER PROGRAM UPDATE PUBLIC COMMENTS

February 27, 2015

Clallam County Department of Community Development

Re: Shoreline Master Program Update

Comments:

After attending presentations by community groups, Clallam County Department of Community Development and Taylor Fish Farms, and reading Amanda Carrs' and attorneys representing Taylor Fish Farms comments regarding the SMP we now have several concerns.

It appears to me, given Ms Carrs' letter and documentation, Taylor Fish Farms would like to wrest control of the SMP from Clallam County residents and have it rewritten to suit only their financial desires.

The SMP should be responsible first to the resident of Clallam County.

Section 1.5.5 is clear: "...the public's opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state shall be preserved to the greatest extent feasible... uses shall be preferred which are consistent with the control of pollution and prevention of damage to the natural environment..."

It is not possible for the State of Washington to know and understand the complex ecosystems and environmental challenges of each foot of Washington's shoreline but local residents do. The SMP must be written in a way that assures Clallam County control of sensitive areas such as the Dungeness / 3 Crabs / Dungeness Wildlife Refuge area.

The SMP should give Clallam County the power to determine what actual financial benefits may be accrued through commercial development, and factor that into potential commercial development of our shoreline.

We should be able to demand thorough, verifiable, and reliable scientific research regarding possible short AND long term environmental impact that may result from commercial development of our shoreline.

The SMP should eliminate double standards that force residents to assume onerous cost when trying to make (or not be allowed to make) minor changes to their property while making it easy for commercial interest to avoid those costs.

The SMP should allow Clallam County to determine potential risks to marine and bird life that may occur due to commercial development and use that information to allow or deny commercial development.

The SMP should allow Clallam County to require a substantial and thorough EIS and peer reviewed scientific studies regarding proposed commercial development of our shoreline.

The SMP should allow for input regarding effects of commercial shoreline development to use of navigable waterways.

The SMP should allow Clallam County to determine what is small vs large scale commercial aquatic farming.

Section 1.5.5 Also states, in part when changes may be authorized, "... in those instances when authorized, shall be given priority for single family residences..." At least in certain areas, this should take precedence over commercial interests.

Others have suggested, and we agree, there should be a moratorium on any commercial aquaculture development until an at least 7 year study on the effects of goeduck farming is completed, Also, we agree with the proposal that the SMP should have the ability to designate areas we deem too fragile as no aquaculture zones.

Our concerns with the SMP update rise out of a concern of the possible (and, really, obvious) incredible damage that could be done to the Dungeness / 3 Crabs/ Dungeness Wildlife Refuge areas.

While the concerns we mention below are specific to the proposed Taylor Goeduck farm the issues raised, we believe, apply to the general issues about how the SMP will affect and be used throughout Clallam County:

Thousands of birds use the proposed site of the Taylor Goeduck farm during migration. Many WILL be caught in the netting. Other marine life will I be caught in the nets as well. Terrific storms send huge trees right through the proposed area. Many people who kayak the area will be denied access as a result of the farm. Views will be spoiled by the farm and workers and boats and machinery used at the site. Taylor farms has NOT resolved noise issues. The numbers Taylor Farms use for economic development are crazy. 30 full time employees? That is a lot of people working with boats and machinery day and night in a fragile environmental zone. 30 acres of Goeduck farms is up to 60times larger than other Taylor farms. The choice of using the 3 Crabs site to experiment with large scale goeduck framing is nuts.

Again, reading the comments from Taylor's attorneys, it seems clear that they want the SMP update to be rewritten in such a way as to give them a clear and easy path to as much commercial shoreline development they desire, maybe as much as the 380+- acres they have leased at the 3 Crabs location. We hope that our SMP planners are alarmed by this. We hope the update of the SMP will rebuff their strategies.

The SMP must clarify whether Clallam County residents or Taylor Fish Farms or any other commercial interest decides what's best for Clallam County.

We look forward to seeing a plan that is revised in a way that represents your neighbors in Clallam County. It may turn out that Clallam County's SMP conflicts with parts of the states overall general plan. If that is the case it will give the state the opportunity to work through issues and rewrite the general plan in a way the benefits all counties and peoples of Washington State.

Thank you,

Richard Bloomer
Deborah Turner