

From: [Ed Bowen](#)
To: [zSMP](#)
Subject: Shoreline Master Program
Date: Tuesday, January 10, 2017 6:07:56 PM

To: SMP@co.clallam.wa.us (Shoreline Master Program)

This message was sent via the Clallam Website Email Form 01-10-2017.

Name: Ed Bowen

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Comments: As presented to the county on many many occasions, the SMP update process has failed its public involvement policy to host forums on key components of the update. For WRIA 20 this specifically involves the Cumulative Impact and No Net Loss components; to date no public forum has been held in WRIA 20 on such components, and not known to occur anywhere in Clallam County for WRIA 20 for that matter.

With the lack of confidence in the ICR for WRIA 20 and the resulting significant impact of CMZ issues presented to landowners in WRIA 20 in the NOV 2014 draft, this is another key component that should have/should host a forum with the affected public.

But yet the county (and I believe it is the elected director DCD and key under-staff) spend more tax dollars for a consultant responsible for a scope of work to move forward with finalizing the updated plan; that should/could at least do something in line with the intent of such a forum, at least in responding with clarity what these key components of the update mean to the people of WRIA 20 by at least responding to comments/testimony received, but won't:

- The work will include a cumulative impacts GIS analysis for the shoreline "analysis areas" identified in WRIA 20.
- The GIS analysis does not include collecting any new data that is not otherwise readily available. ESA will brief the County on the methodology in advance of the analysis but will not prepare multiple iterations of the analysis.
- this task does not include responding to individual comments.

This is wrong and I make the accusation the county is in violation of its published policy to public engagement on the Clallam County SMP Update.