

**CLALLAM COUNTY
SMP
COMMENT SUBMISSION**

Section 3.3 addresses Commercial and Industrial Development with consideration focused on preventing activities damaging to shorelines. It offers no such prophylactic remedy with regard to climate change impacts. The placement of a facility or service in an area designated as untenable by existing climate study and concurrent scientific survey should constitute a violation of the SMP and be so construed as prohibited. This is a major flaw and must be addressed in the final version of the SMP. Such a mandate necessitates the inclusion of precedential studies, surveys, testimony and de facto acknowledgement of climate change impacts. Presentation and implementation of the SMP without including such knowledge shall constitute willful negligence and may serve as a remedy for legal challenges to the plan and support claims against property and environmental harm. Such a liability could present Clallam County with a plethora of adversarial actions which could levy a substantial cost to the taxpayer, County and perhaps the State. This statement shall be submitted for review and consideration.

Respectfully, Brian Grad
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