

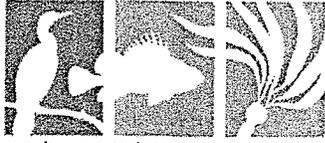
Erika Shook

From: Byron Rot
Sent: Thursday, August 16, 2018 2:44 PM
To: DL - Council
Cc: Erika Shook
Subject: comment letter for SMP PCODEC 18-0003 Amending Shoreline Regulation
Attachments: MRC-CAG comments on SMP update August 16 2018.pdf

Thank you for your consideration. I unfortunately cannot be at the hearing tomorrow, I'll be on Orcas, but am in the office this afternoon if any clarification is needed.

Byron

Byron Rot
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san juan county
marine stewardship area
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San Juan County
Marine Resources Committee
and
Citizens Advisory Group for
Salmon Recovery
915 Spring St – PO Box 729
Friday Harbor, WA 98250



August 15, 2018

Bill Watson
Chair, San Juan County Council
350 Court St #1
Friday Harbor, WA 98250

Re: Comments on SEPA addendum fact sheet, PCODES 18-0003, Amending Shoreline Regulations, dated August 1, 2018.

Dear Councilman Watson,

The Marine Resources Committee in its role as Citizens Advisory Group to Salmon Recovery ask that the above shoreline regulation amendment be modified to reflect these comments. We appreciate the opportunity to comment. The comments below reference the section numbers in the amendment.

Section 1.

Soft shore stabilization material can and often do include natural beach gravel. For example, a soft shore restoration project on Fidalgo Bay (Samish Indian Nation RV Park) replaced hard armor with a beach gravel berm, and has functioned quite well.

Recommendation: Add “beach gravel.” “Soft shoreline stabilization measures” means shore erosion control structures and measures composed of primarily natural and semi-rigid or flexible materials, logs, **beach gravel**, bio-engineering....

Section 2.E.3.

This paragraph informs us the Shoreline Master Program (SMP) will be *periodically* reviewed, to include “evaluation of project review actions in shoreline areas and the cumulative effects of authorized shoreline development.” Please define *periodically*, it is stated three times in this paragraph. The first review is a starting point (baseline) for future reviews. A 5-year review interval should be sufficient unless problems are discovered during the initial review that warrant a more frequent interval.

Recommendation: define *periodically* as a 5-year interval with the first review to occur within a year of adoption of this amended shoreline regulation.

Section 3.C.

This section directs shoreline mitigation to be located in the San Juan County stormwater watershed. Since the impacts are shoreline based, the offsite mitigation should be shoreline based as well. San Juan County Lead Entity for Salmon Recovery has prioritized all public and private shoreline parcels in San Juan County for their restoration or acquisition potential in terms of salmon recovery (Whitman et al 2017). This is a great starting place to direct offsite shoreline mitigation activities.

If San Juan County develops a mitigation bank, that could also be another alternative.

Recommendation: Add the following language after the second sentence. “Such offsite mitigation will be shoreline-based to the extent practicable.”

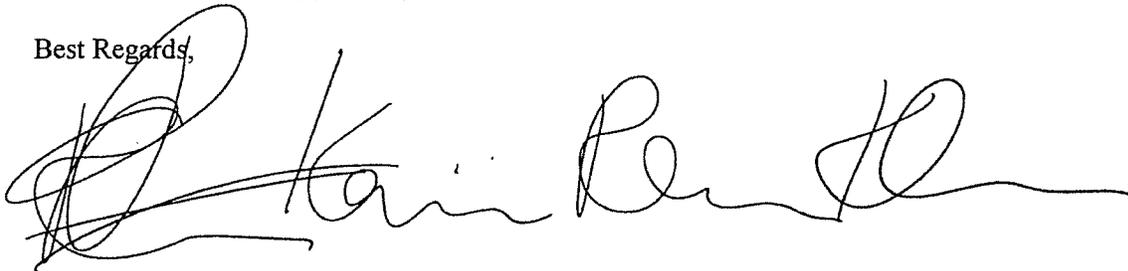
Section 4.C.

There is a typographic error in this Section. Please delete “may” in the below sentence.

Recommendation: “New, replaced, or enlarged soft structural shoreline stabilization measures ~~may~~ are not allowed unless conclusive evidence documented by a geotechnical analysis...”

Thanks again for the opportunity to comment.

Best Regards,

A handwritten signature in black ink, appearing to read "Karin Roemers-Kleven". The signature is fluid and cursive, with a large initial "K" and "R".

Karin Roemers-Kleven
Chair, Marine Resources Committee-Citizens Advisory Group to Salmon Recovery

Cc: Erika Shook, Director San Juan County Department of Community Development

