

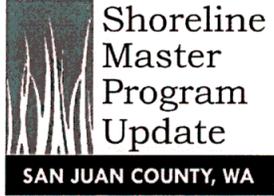


\*261733006000-030-079-SOMMERVILLE-20120427\*



San Juan County  
**Community Development & Planning**

135 Rhone Street, P.O. Box 947, Friday Harbor, WA. 98250  
(360) 378-2354 (360) 378-2116 Fax (360) 378-3922  
cdp@sanjuanco.com | www.sanjuanco.com



**COMMENT FORM**

Please give us your thoughts on the Shoreline Master Program Update.

Help shape the future of the County's Shorelines!

Your comments and input are invited as the planning process of the San Juan County Shoreline Master Program Update continues. Your concerns and questions about the update and any comments about the inventory of the County's shorelines would be helpful; for example, how accurate is the inventory, are we missing anything, etc.

S.J.C. COMMUNITY

APR 27 2012

DEVELOPMENT & PLANNING

Tad Sommerville  
200 N E Pacific St., Suite 102  
Seattle WA 98105 6856

PHONE: 206.300.3425

TADS@UW.EDU

SEE ATTACHED COMMENTS ON PAGES  
# 261733006000

To: Colin Maycock

From: Tad Sommerville / APRIL 25, 2012

RE: Shoreline Characterization Report for SMP Update/April 30, 2012

Parcel numbers: 261733006000; West Sound Management Area;

Shoreline Reach No. 30

S.J.C. COMMUNITY

APR 27 2012

DEVELOPMENT & PLANNING

Dear Mr. Maycock:

We have tried to review the overwhelming amount of information contained in the Shoreline Inventory and Characterization Report. It has been a daunting task. We own properties located in the West Sound Management Area and specifically within shoreline reach number 30. This report is our attempt to comment on and in some cases dispute the information contained in the report.

My general comment is that the report attempts to make very broad generalizations about specific attributes of each of the reaches. For example, reach number 30 is over two miles long and encompasses a myriad of shoreline types and uses. In some parts of reach 30 there are over-water structures, beach armoring, pocket beaches, beaches with cliff and rocky substrate. Some parts of the reach are quite exposed and sunny, and some are very dark and shady. The geomorphic criteria used to delineate reaches are far from perfect. In the case of reach 30, the geomorphic data, along with the other aspects of land use, should have been evaluated in such a way that the reach should have been broken-down into smaller more geomorphically consistent reaches. This may be the case with other reaches.

Furthermore, how is it possible to organize the observations of reach 30 (or any reach described in the report) and create a scoring system called, "Reach Ecological Function Assessment"? Whereas the scoring criteria described on page 10-18 of the report may represent an admirable attempt to organize and describe the data and observations, the scope and length of the reach(s) is/are substantive and lengthy enough that the designation of a specific "0 to 5" score for a specific attribute is too arbitrary. Furthermore, the person doing the "scoring" will do so based upon their interpretation of the data. This interpretation is too dependent upon the individual's personal and professional values and the scores could somewhat be influenced by their political philosophy despite the existence of the criteria on pages 10 -18. In contrast, a small subset of other "qualified" professionals or "scorers" may score the ecological functions completely differently than the "official scorer" of this report.

As indicated on page 1 of the *Shoreline Inventory and Characterization Report*, the report (according to the author), accomplishes the following:

- Provides supporting information for determining updated environmental designations.
- Establishes the baseline for "no net loss" of ecological conditions and informs development of protective policies, regulations and mitigation standards.
- Identifies opportunities for protection, improving public access, and supporting water dependent uses.

- Identifies degraded areas and opportunities for restoration to be incorporated into the restoration plan.

While these objectives may be noble, the shoreline inventory and characterization analysis combined with its ecological function assessment scoring system, for the reasons described above, is too onerous to be used as a baseline document on which the investment, livelihoods, and lifestyles of property owners will be based. What is obviously missing from this report is any discussion of methods or processes by which a property owner can without great expense, time or trouble, dispute and hopefully resolve any discrepancies in the report. Not only will mistakes be made in a document as broad and involved as this one, but as pointed out earlier, the assessment and analysis of a reach may not be consistent with that of a property owner's shoreline.

In conclusion, we object to the use of the Shoreline Inventory and Characterization Report to be used for the purposes described in the bullet points on page one without a corresponding CD&P building application, dispute and resolution methodology that is fair, clear, not costly, efficient, and approved by the citizens and landowners. Finally, if and when the county decides to use this inventory report as a baseline for regulatory purposes, the landowner should be given plenty of notice so that he can provide the county with a shoreline inventory of his own shoreline and associated buffer – by parcel. This inventory by reach does not accomplish that objective.

We have the following comments and/or disputes:

Map 12	Floodplains and wetlands	Indicated on map 12 as zone A. Should be nil.
Map 19	Land cover	Evergreen canopy. No scrub present.
Map 20	Impervious surfaces	Structures not indicated on map.
Map 22	Priority habitats	None listed or applicable
Map 23	PHS Aquatic Vegetation	Eelgrass indicated. However, WDFW Habitat and Species Map dated May 3, 2010 indicates no existence of eel grass, turf algae, or kelp beds.
Map 27	SRSC Chinook	Low or non-existent
Map 28	SRSC Chum	Map indicates medium existence. Chum salmon have never been observed in 30-years.
Map 29	SRSC Pink	Map indicates high existence. Pink salmon have never been observed in 30-years.
Map 31	SRSC Surf Smelt	Map indicates both low and medium existence. However, WDFW Surf Smelt map dated May 3, 2010 indicates no existence of surf smelt.

Map 32	SRSC Sand Lance	Map indicates low existence. However, WDFW Sand Lance map dated May 3, 2010 indicates no existence of sand lance.
Map 33	SRSC Pacific Herring	Map indicates medium to high existence
Map 34	Vacant Parcels	N/A

These assessments of the existence of certain fish species are not based upon observations but models. We do not agree with the modeling approach and based upon our own observations dispute some of the results of the model.

It should be noted that the Shoreline Inventory and Characterization Report does not indicate any specific harm that the existing structures on property owned by us are causing on any existing shoreline condition or habitat.

As described in the first part of the letter, the Shoreline Inventory and Characterization Report and its associated Reach Ecological Function Assessment described on page 241 does not completely accurately described the shoreline owned by the property owner.

Thank you.



Tad Sommerville

Table 35B. West Sound Management Area Reach Assessment – Habitat Conditions.

Reach	Estuary/ Wetland Habitat	Total Vegetative Cover	Shoreline Alterations	Shoreline Sediment Input Alterations	Bat Presence	Bird Presence	Haul-out Habitat	Elgrass Presence	Kelp Presence	Forage Fish Priority Spawning Habitat	Shellfish Habitat	Smelt Presence Probability	Herring Presence probability	Sandlance Presence probability	Lingcod Presence probability	Pink Salmon Presence probability	Chum Salmon Presence probability	Chinook Salmon Presence probability	Total
23	0	4	4	4	0	0	0	5	0	0	4	2	1	1	3	4	4	2	38
24	0	5	5	5	0	1	0	5	5	0	3	2	3	1	1	4	3	1	44
25	2	3	4	4	0	0	0	5	0	0	2	3	2	1	1	2	1	1	31
26	3	4	4	4	0	0	0	5	0	0	2	5	1	1	1	1	1	1	33
27	2	3	4	4	0	0	0	5	0	0	2	5	3	1	1	4	3	2	39
28	0	4	3	3	0	0	0	5	0	0	2	5	3	1	1	4	3	2	36
29	0	4	4	4	0	0	0	5	0	0	2	5	2	1	1	2	2	1	33
30	0	4	4	4	0	0	0	5	10	12	3	10	3	10	10	10	10	1	46
31	1	5	5	5	0	0	0	5	0	0	1	2	3	1	2	4	3	1	38
32	1	5	5	5	0	1	0	5	5	0	2	2	3	1	2	4	3	1	45
33	0	4	5	5	0	1	0	0	0	0	1	2	3	1	2	4	3	1	32
34	4	5	4	4	0	0	0	5	5	3	1	3	3	1	2	4	3	1	48
35	0	2	5	5	0	5	0	0	0	0	1	2	3	1	2	4	3	1	34
36	0	3	4	4	0	0	0	5	0	0	1	4	3	1	1	4	3	2	35
37	1	4	4	4	0	0	0	5	0	0	1	4	3	1	1	4	3	2	37
38	1	3	4	4	0	1	0	0	0	3	1	5	3	1	1	3	2	2	34
39	1	4	3	3	0	0	0	5	0	0	1	5	4	1	2	4	3	2	38
40	1	4	5	5	0	0	0	5	0	0	1	2	3	1	2	4	3	1	37
41	1	4	2	2	0	0	0	5	0	0	1	3	3	1	2	4	3	2	33
42	1	5	4	4	0	0	0	5	5	0	2	3	3	1	1	4	3	1	42
43	0	4	5	5	0	0	0	5	5	3	1	2	2	3	3	4	3	2	47
44	0	3	4	4	0	0	0	5	0	3	1	4	1	1	2	2	1	2	33
45	0	5	5	5	0	1	0	5	5	0	1	3	2	3	3	4	3	2	47
46	0	5	4	4	0	0	0	5	5	0	1	3	1	2	3	3	2	2	40
47	1	5	5	5	0	0	0	5	5	0	1	2	2	3	4	4	3	2	47
48	0	5	4	4	0	0	0	5	0	0	0	3	2	2	3	3	3	2	36
Median	0.5	4	4	4	0	0	0	5	0	0	1	3	3	1	2	4	3	2	37.5
Average	0.8	4.1	4.2	4.2	0.0	0.4	0.0	4.4	1.7	0.6	1.5	3.2	2.5	1.3	1.9	3.5	2.7	1.5	38.6
Percent of Highest Possible Score	15%	82%	84%	84%	0%	8%	0%	88%	35%	12%	30%	65%	50%	26%	38%	71%	54%	31%	43%



S.J.C. COMMUNITY

**Sommerville - 261733006000**

APR 27 2012



1:1200

This data has been compiled for San Juan County. Various official and unofficial sources were used to gather this information. Every effort was made to ensure the accuracy of this data, however, no guarantee is given or implied as to the accuracy of said data.

DEVELOPMENT

