

**Joint Comment Period Summary: Draft SMP Amendments**  
**Joint Ferry County Coalition and Ecology Public Comment Period, 11 October to 13**  
**November and Joint Public Hearing 13 November 2023**  
*Prepared by William Folks, 14 Nov 2023*

| No.   | Comment Topic or SMP Code Section (Citation) | Comment  | Ferry County Coalition Response  |
|---|--|--|--|
| 1   | Section 7.18 Shoreline Designation Maps      | Show additional natural and recreation areas as shown on submitted Map 1.  | <p>The requested changes were discussed and denied.</p> <p><b>Shoreline Designation</b> - SMP Section 2.01 Para D 3 - "Only one shoreline area designation shall apply to a given shoreland area."</p> <p><b>Natural</b> - SMP Section 2.03 Para A 1 - "The purpose of the Natural shoreline designation is to protect those shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline ecological functions less tolerant of human use."</p> <p><b>Recreation</b> - SMP Section 2.06 Para B 1 b - "The shoreline is highly developed, and most development is recreation-related with potential for additional recreation and recreation-related commerce or is suitable and planned for water-oriented uses."</p> <p><b>Rural</b> - SMP Section 2.04 B 1</p> <p>a. - "The shoreline is not highly developed, and most development is agriculture, rangeland, or low-density residential. Unimproved land is used for livestock grazing, forestry, logging, and/or harvesting of non-cultivated crops.</p> <p>b. The shoreline has riparian vegetation with high to moderate ecological functions.</p> <p>c. The shoreline has low to moderate potential for public, water-oriented recreation where ecological functions can be maintained or restored."</p> |
| <b>Comments received during County Planning Commission local review (August 2023)</b> |  |  |  |
| 2   | Section 7.18 Shoreline Designation Maps      | Show additional natural and recreation areas as shown on submitted Map 1.  | See above response   |
| 3   | Section 7.18 Shoreline Designation Maps      | The entire map collection is out of date.  | The coalition reviewed the map collection and determined that there have been no changes along our shorelines that would warrant changes to the current designations.  |
| 4   | Section 7.17 Definitions                     | Consider defining remedial.  | Considered. The use of the term is consistent with the common dictionary definition.   |
| 5   | Section 3.08 Flood Hazard Reduction          | "Also, see attached snapshot for risk of loss to river functions due to existing farming practices. In particular lack of tree roots to stabilize the river banks. River widening is | <p>CMZs are addressed in provisions for Fill, Shoreline Stabilization, Floodplain Management, Flood Hazard Reduction (especially Section 3.08(C) and (F.2)), to ensure they are considered &amp; protected.</p> <p>The SMP does not/cannot disallow legally existing &amp; ongoing Ag activities on Ag lands.</p>  |

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|   |   | <p>detrimental to farming, fish and recreational uses.”</p> <p>Comment on attached - Risk to CMZ must be considered and existing farming practices not allowed.</p>   | <p>Agriculture is covered under Section 4.01. Para A states that, “This SMP shall not require modification of or limit agricultural activities occurring on agricultural lands consistent with RCW 90.58.065.”</p> <p>Under Section 4.01, Para H states, “Agricultural uses and activities shall prevent and control erosion of soils and bank materials within shoreline areas. They shall minimize siltation, turbidity, pollution, and other environmental degradation of watercourses and wetlands.”</p> |
| 6 | Section 4.4 A 2 Goals                     | Changes inconsistent with SMA   | Coalition agreed that the changes were inconsistent and removed the changes that had been made.  |
| 7 | Section 5.06 Geologically Hazardous Areas | <p>Include additional landslide hazard provisions in CAO Section 8 for shoreline application by SMP Section 5.06:</p> <ul style="list-style-type: none"> <li>• require review of any landslide capable of damaging the proposed development;</li> <li>• use a two-step process to identify landslide hazards; Section 8</li> <li>• require site-specific identification of specific landslide features such as top of slope, slope faces subject to failure, toe of slope areas subject to impact from down slope run out, and buffers for areas subject to landslide hazards;</li> <li>• do not allow subdivision access roads and utilities to locate in landslide hazards or their buffers.</li> </ul> | <p>Ferry County utilizes the GIS geological hazards overlays provided by DNR. And as stated in Section 5.06 para A 2 – “Additionally, this Section incorporates by reference Section 8 of the Ferry County CAO, for geologically hazardous areas within the shoreline jurisdiction.”</p> <p>Changes to the CAO are out of scope but the County will consider the comment when the CAO is reviewed.</p>   |