

APPENDIX E: State Environmental Policy Act (SEPA)

- SEPA Memorandum (1pg)
- SEPA Checklist (13 pgs)
- SEPA Determination of Non-Significance (1 pg)
- SEPA Comments (2 pgs)

MEMORANDUM

Clallam County Department of Community Development Planning Division

TO: Washington State Department of Ecology, Agencies, and Interested Parties

FROM: Hannah Merrill, Associate Planner, Natural Resources

RE: SEPA Lead Agency and Pre-Threshold Determination request for comment for the Dungeness River Comprehensive Flood Hazard Management Plan (DR-CFHMP). The applicant is Clallam County, Port Angeles WA.

DATE: May 11, 2009

Clallam County has updated the Dungeness River Comprehensive Flood Hazard Management Plan (DR-CFHMP) incorporating WAC 173-145-040 plan elements and integrating Growth Management Act requirements including inventories/GIS mapping of critical areas and resource lands as required under 36.70A.060 RCW and Chapter 365.190 WAC. A Determination of Non-Significance (DNS) is anticipated for the following plan proposal:

PROPOSAL:

Many changes have occurred since the Dungeness River Comprehensive Flood Control Management Plan was adopted in 1990. Further studies have been conducted and have been integrated into the DRCFHMP to help guide future management in relation to river flood hazards. The amended DRCFHMP will describe restoration and flood hazard reduction activities that meet both habitat improvement and hazard reduction goals.

A SEPA Determination is required by the WDOE FCAAP Grant Agreement with Clallam County.

LOCATION:

Township: 29, 30, 31 N, Range 4W
Latitude: 48, Longitude: 123° 07'
Dungeness River mile: 0 - 10.8

Attached are the following: the applicant's Environmental Checklist pdf. and a link to the plan:

<http://www.clallam.net/environment/html/DRFP.htm>

PRE-THRESHOLD DETERMINATION COMMENTS SHALL BE RECEIVED BY MAY 22, 2009.

There will be an additional opportunity to comment through the Public Hearing process to be scheduled in early June.

Cc: Jamestown S'Klallam Tribe
WDOE
WDFW
USFW
City of Sequim



Clallam County
Department of Community Development
John Miller, Director
223 East 4th Street, Suite 5, Port Angeles, WA 98362
(v) 360-417-2420 ✦ (f) 360-417-2443
email: dcdplan@co.clallam.wa.us

ENVIRONMENTAL CHECKLIST
WAC 197-11-960

Purpose of checklist:

The State Environmental Policy Act (SEPA), Chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of checklist for nonproject proposals:

Complete this checklist for non-project proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (Part D).

For non-project actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project, if applicable:
Dungeness River Comprehensive Flood Hazard Management Plan (DR-CFHMP)
2. Name of applicant:
Clallam County
3. Address and phone number of applicant and contact person:
**Department of Community Development
Clallam County Courthouse
223 East Fourth St., Suite 5
Port Angeles, WA 98362**
**Contact Person: Hannah Merrill, Natural Resources Planner
Phone Number: 360-417-2321**
4. Date checklist prepared:
April 2009
5. Agency requesting checklist:
Washington Department of Ecology
6. Proposed timing or schedule (including phasing, if applicable):
Adoption of the plan is scheduled for spring 2009.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.
The CFHMP is an informational document for Clallam county and local agencies, county property owners, realtors, and area residents. Provides guidance for SMP updates, critical area review, and land use. Recommended actions are eligible for grant funding under the Washington State Flood Control Assistance Account Program (FCAAP)
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.
***Recommended Land Protection Strategies for the Dungeness River Riparian Area, H. Hals & Dungeness River Restoration Work Group, 2003.
Numerical Modeling Study of Levee Setback Alternatives for Lower Dungeness River, Washington, Y. Lai, J. Bountry, USDI Bureau of Reclamation, 2007.
Delineation of the Dungeness River Channel Migration Zone, River Mouth to Canyon Creek, B. Rot & P. Edens, Jamestown S'Klallam Tribe, 2009.***
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.
None.
10. List any government approvals or permits that will be needed for your proposal, if known.

This plan in its final form will be adopted by the Clallam County Board of Commissioners. It must also be accepted by the Washington Department of Ecology if Flood Control Assistance Account Program funds are sought by the County for the river. No permits are required. The Clallam County Board of Commissioners approval is required for the adoption of this plan by the County.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

Clallam County is proposing to adopt an amended version of the Dungeness River Comprehensive Flood Hazard Management Plan, updating the existing plan approved by the County and the Washington Department of Ecology in 1990. The updated plan is an advisory document suggesting flood hazard reduction strategies including updates to maps of the channel migration zone, measurement of setbacks from the CMZ, acquisition of sensitive and flood-prone areas, and the setback or removal of levees and other constrictions within the channel migration zone. The plan also recommends education, outreach, and monitoring.

Preparation of the Dungeness River CFHMP is a prerequisite for state financial assistance for flood control maintenance through the state's Flood Control Assistance Account program. The purpose of this CFHMP is to provide a comprehensive approach to flood hazard management planning. This will provide a better understanding of the Dungeness River system and ensure that flooding problems are not simply transferred to another location with the watershed, but are addressed in a comprehensive, watershed-based approach.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

**Dungeness River, Sequim WA
Township: 29, 30, 31 N, Range 4W
Latitude 48, Longitude: 123° 07'
Dungeness River mile: 0-10.8**

B. ENVIRONMENTAL ELEMENTS

1 EARTH

- a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other: _____

Yes, to all of the above. River valley.

- b. What is the steepest slope on the site (approximate percent slope)?

Approximately 1.2 to 1.5 percent.

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

The soils are generally alluvial in nature, deposited during flooding of the river. The U.S. Soil Conservation Service classifies these as Clallam-Puget-Dungeness soils.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Natural processes of channel migration, erosion and slope movement upstream of and within the plan area frequently result in property damage, high sediment loads and bed aggradation in the Dungeness River.

- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

N/A

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

N/A

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

N/A

Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

N/A

2. AIR

- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, and industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

N/A

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

N/A

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

None are necessary.

3. WATER

- a. Surface:

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The plan focuses on the Dungeness River from the mouth to RM 10.8.

2. Will the project require any work over, in or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None.

4. Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

The entire area of this plan includes the floodplain of the Dungeness River.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

b. Ground:

1. Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

N/A

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

N/A

c. Water Runoff (including storm water):

1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

None.

2. Could waste materials enter ground or surface waters? If so, generally describe.

N/A

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

The basin draining to the Dungeness River is shown in Figure 2.2. Any structures would be limited by local, state, and federal permit requirements to periods of low flow and minimum impact to instream resources.

PLANTS

- a. Check or circle types of vegetation found on the site:

deciduous tree: alder, maple, aspen, other: black cottonwood
 evergreen tree: fir, cedar, pine, other: Western hemlock
 shrubs
 grass
 pasture
 crop or grain
 wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other:
 water plants: water lily, eelgrass, milfoil,
_____ other types of vegetation

- b. What kind and amount of vegetation will be removed or altered?

This type of action is not recommended in this CFHMP.

- c. List threatened or endangered species known to be on or near the site.

Chinook and summer chum salmon, steelhead, and bull trout are presently listed as threatened species under the Federal Endangered Species Act. Early-timed upper river stock of pink salmon is considered depressed while the lower river stock of pink is critical.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Recommendations include the reestablishment of native riparian vegetation.

5. ANIMALS

- a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

Birds: hawk, heron, eagle, songbirds, other: waterfowl, and shorebirds
Mammals: deer, bear, elk, beaver, other: cougar
Fish: bass, salmon, trout, herring, shellfish, other: _____

- b. List any threatened or endangered species known to be on or near the site.

Protected birds: Northern Spotted Owl, marbled murrelet, bald eagle

- c. Is the site part of a migration route? If so, explain.

The Dungeness River is an important migration route for a variety of salmonid species Chinook, Coho, Pink, Chum, throughout the year.

- d. Proposed measures to preserve or enhance wildlife, if any:

Preserve riparian vegetation along river channel. Mitigate for potential impacts to wildlife habitat affected by potential construction.

6. ENERGY AND NATURAL RESOURCES

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

N/A

Would your project affect the potential use of solar energy by adjacent properties?
If so, generally describe.

N/A

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None are necessary

7. ENVIRONMENTAL HEALTH

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

N/A

1. Describe special emergency services that might be required.

None are required.

2. Proposed measures to reduce or control environmental health hazards, if any:

None are necessary.

- b. Noise

1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

N/A

2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

N/A

3. Proposed measures to reduce or control noise impacts, if any:

None are necessary.

8. LAND AND SHORELINE USE

- a. What is the current use of the site and adjacent properties?

The current use of the area along the Dungeness River is agriculture, residential, and commercial uses within the U.S. Highway 101 corridor.

- b. Has the site been used for agriculture? If so, describe.

Yes, agricultural uses exist throughout the Dungeness River Basin.

- c. Describe any structures on the site.

N/A

- d. Will any structures be demolished? if so, what?
Levee setbacks are recommended.
- e. What is the current zoning classification of the site?
Those areas along the river which are zoned are predominantly residential (mostly R5, one unit per 4.8 acres, with some AR, Agricultural Retention areas designated)
- f. What is the current comprehensive plan designation of the site?
Includes Rural Residential and Agricultural lands. Comprehensive Plan designations for the area include rural (one unit per one to five acres) with some rural village (four units per acre.)
- g. If applicable, what is the current shoreline master program designation of the site?
The current Shoreline Master Program designations for the site include rural for the river shoreline and a mixture of rural and conservancy for the area along the Strait of Juan de Fuca where the river meets the sea.
- h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.
Critical areas exist along the entire corridor of the Dungeness River. Floodplain, channel migration zone, aquatic and wildlife conservation areas, etc.
- i. Approximately how many people would reside or work in the completed project?
N/A
- j. Approximately how many people would the completed project displace?
None.
- k. Proposed measures to avoid or reduce displacement impacts, if any:
None are necessary.
- l. Proposed measures to ensure the proposal is compatible with existing and project land uses and plans, if any:
Yes. The flood plan takes into account the latest studies including the "Numerical Modeling Study of Levee Setback Alternatives for Lower Dungeness River, Washington" (Lai/USDI-BOR, 2007), "Recommended Land Protection Strategies for the Dungeness River Riparian Area" (Hals/DRRWG, 2003), and Delineation of the Dungeness Channel Migration Zone (Rot & Edens/JS'KT, 2008).

9. HOUSING

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
N/A
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

N/A

Proposed measures to reduce or control housing impacts, if any:

None are necessary.

10. AESTHETICS

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

N/A

- b. What views in the immediate vicinity would be altered or obstructed?

N/A

- c. Proposed measures to reduce or control aesthetic impacts, if any:

N/A

11. LIGHT AND GLARE

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

N/A

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

- c. What existing off-site sources of light or glare may affect your proposal?

None.

- d. Proposed measures to reduce or control light and glare impacts, if any:

None are necessary.

12. RECREATION

- a. What designated and informal recreational opportunities are in the immediate vicinity?

N/A

- b. Would the proposed project displace any existing recreational uses? If so, describe.

N/A

Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None are necessary.

13. HISTORIC AND CULTURAL PRESERVATION

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

N/A

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

N/A

- c. Proposed measures to reduce or control impacts, if any:

N/A

14. TRANSPORTATION

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

N/A

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

N/A

- c. How many parking spaces would the completed project have? How many would the project eliminate?

N/A

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

N/A

- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

N/A

- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

N/A

- g. Proposed measures to reduce or control transportation impacts, if any:

None are necessary.

15. PUBLIC SERVICES

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

None.

- b. Proposed measures to reduce or control direct impacts on public services, if any.

None are necessary.

16. UTILITIES

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

N/A

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

N/A

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: Hannah Merrill

Date Submitted: 5-11-09

D. SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

(do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Adoption of the DR-CFHMP would not result in any increased water discharge.

Proposed measure to avoid or reduce such increases are:

No mitigation is required.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Plan encourages efforts to manage for flood hazards while preserving habitat.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Recommendation to measure development setbacks from the CMZ line rather than the OHWM line, setback levees, and discourage development in the flood plain.

3. How would the proposal be likely to deplete energy or natural resources?

No depletion of energy or natural resources is anticipated.

Proposed measures to protect or conserve energy and natural resources are:

No mitigation is required.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The DR-CFHMP recommends non-structural measures to reduce impacts associated with Dungeness River flooding primarily by setting back structures from the edge of the channel migration zone, re-vegetation, removal of channel constrictions, and education. Structural measures for the protection of property from flood damage are suggested as a last resort. Recommended actions are likely to reduce impacts to floodplains, threatened and endangered species habitat, and floodplains.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Plan recommends all of the above mentioned actions.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Adoption of the plan could augment and strengthen existing regulations through use of current CMZ maps and would be an advisory document for updating the Shoreline Master Program.

Proposed measures to avoid or reduce shorelines and land use impacts are:

Update the Shoreline Master Program to be completed in 2011.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

No impacts to transportation, public services, and utilities are anticipated.

Proposed measures to reduce or respond to such demand(s) are:

No mitigation is required.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The plan is made in compliance with all laws and requirements.

**State Environmental Policy Act (SEPA) WAC 197-11
DETERMINATION OF NON-SIGNIFICANCE (DNS)**

Description of Proposal:

Dungeness River Comprehensive Flood Hazard Management Plan (DR-CFHMP). The CFHMP is an informational document for county property owners, realtors, and area residents. Recommended actions are eligible for grant funding under the Washington State Flood Control Assistance Account Program (FCAAP).

Location of Current Proposal:

Dungeness River, Sequim WA. Township: 29, 30, 31 N, Range 4W. Latitude 48, Longitude: 123° 07'. Dungeness River mile: 0-10.8.

Lead Agency: Clallam County

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with Clallam County. This information is available to the public on request at the office of the Responsible Official as listed herein.

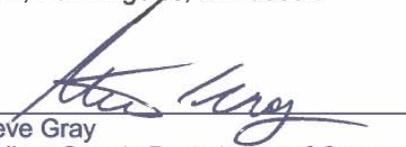
This Determination of Non-Significance (DNS) is issued under WAC 197-11-355. Comments must be submitted by **June 17, 2009**.

Staff Contact: Hannah Merrill, Associate Planner (360) 417-2563

Responsible Official: Steve Gray, Planning Manager
Department of Community Development (DCD)
223 E. 4th Street, Suite 5, Port Angeles, WA 98362

Issuance Date:

6/11/09


Steve Gray
Clallam County Department of Community
Development

This may be the only opportunity to comment on the environmental impacts of the proposal. Unless the Responsible Official withdraws the threshold determination pursuant to WAC 197-11-340(3)(a), the threshold determination shall be final at the end of the comment period. Agencies and interested parties will be notified if the threshold determination is withdrawn. The final threshold determination may be appealed to the Hearing Examiner by filing a written appeal with the applicable fee by June 17, 2009. Contact the Planning Division for SEPA appeal procedures.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 · Olympia, Washington 98504-7775 · (360) 407-6300
711 for Washington Relay Service · Persons with a speech disability can call 877-833-6341

May 22, 2009

Ms. Hannah Merrill, Natural Resources Planner
Clallam County
Community Development Department
223 East 4th Street, Suite 5
Port Angeles, WA 98362



Your address
is in the
**Elwha-
Dungeness**
watershed

Dear Ms. Merrill:

Thank you for the opportunity to comment on the prethreshold consultation for the Dungeness River Comprehensive Flood Hazard Management Plan project. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

FLOODPLAIN MANAGEMENT: Kevin Farrell (360) 407-7253

Ecology's Flood Program appreciates the work and leadership that Clallam County staffs have put into the Dungeness River Comprehensive Flood Hazard Management Plan (CFHMP) update. We are particularly pleased with the emphasis on the proposed establishment of aquatic habitat conservation area buffers associated with the Dungeness River Channel Migration Zone. As a County affected by the National Marine Fisheries Service Biological Opinion of the National Flood Insurance Program (NFIP), establishment of buffers associated with the Dungeness River CMZ will ensure compliance with the intent of the Biological Opinion.

Ecology is also in strong support of the County's desire to purchase properties that are subject to regular flooding. This effort will result in the reduction in flood claims and the protection of the residents most subject to flooding.

Ecology's Flood Program looks forward to assisting the County in implementing the flood reduction strategies and policies outlined in the Updated Dungeness River CFHMP.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM: 09-2736)

cc: Kevin Farrell, SEA



June 17, 2009

Ms. Hannah Merrill, Natural Resources Planner
Clallam County Department Community Development
223 East 4th St. Suite 5
Port Angeles, WA 98362

Dear Ms. Merrill

Thank you for the opportunity to comment on the Dungeness River Comprehensive Flood Hazard Management Plan (DR-CFHMP) update and SEPA checklist. The Dungeness River is the home watershed of the Jamestown S'Klallam Tribe. Our desire is to recover the river, its habitat, and its salmon, so that our Tribal Citizens can once again have the opportunity to fish for salmon in the Dungeness River.

Jamestown S'Klallam Tribe supports this plan update. We provided substantial technical input during the many meetings held over these past years. The DR-CFHMP is a strong step forward. It protects both people and the aquatic habitat of the Dungeness River system. We urge the Clallam Board of County Commissioners to adopt the regulatory recommendations contained in this plan. We also look forward to additional funding to implement the non-regulatory recommendations contained in the plan.

The SEPA checklist is complete. We have no additional comments on the checklist.

Updating the 1990 plan was a major effort that lasted seven years. Considerable expertise was captured and incorporated in the plan. We appreciate all of those County staff that contributed to the plan and their perseverance in completing it.

Sincerely,

Scott Chitwood
Natural Resources Director