



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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Judy, thanks for your review of the SEPA for our new Marine Shoreline Design Guidelines. Below are your comments with our responses.

**City of Port Townsend comment:** Page 75 - The Flow chart on this page offers a useful tool for determining the appropriate shoreline defense. Has WDFW conducted an assessment to estimate the number of Puget Sound properties that would result in the determination “hard armor”? What is the cumulative effect?

**WDFW response:** We have not estimated the number sites that would require hard armor to protect against erosion. The Marine Shoreline Design Guidelines are intended to help the designer select and develop protection measures that avoid or minimize effects on natural nearshore processes. The methodology considers off-site, drift cell level processes but not the cumulative effects of multiple projects. The guidelines are intended foster appropriate project design, not to manage nearshore resources.

**City of Port Townsend comment:** Page 113; “LWD not suitable in a High Wave energy environment.” Or is it? We would ask Hugh Shipman and Jim Johannessen to consider Port Townsend’s North Beach area. In our estimation, the natural build-up of drift logs seems to work well to protect these properties in what appears to be a high wave energy environment?

**WDFW response:** You are right, drift logs can provide protection in severe wave environments. Generally, those situations have plenty of backbeach area and appropriate conditions for the development of a storm berm so that drift logs naturally accumulate there. If LWD is used specifically for erosion control they are anchored and placed under conditions where they would not stay in place without it. Anchored logs do not last long in high energy situations.

**City of Port Townsend comment:** Regarding the cost of hard armoring, the report notes that mitigation is an added cost for hard armoring; this fact cannot be overstated. Pursuant to “no net loss” mandates under the Shoreline Management Act (SMA), local Shoreline Master

Programs (SMP's) are being written to discourage hard armoring. Applicants proposing hard armoring will be required to submit additional analysis to justify the proposal, assess cumulative impacts and include a "no net loss" determination. They must include a mitigation and monitoring plan. Then add the cost of the actual implementation and monitoring.

**WDFW response:** We provide the framework for evaluating the full impacts of any technique, but we do not prescribe specific compensatory mitigation. Unfortunately, mitigation is site specific and crafted under various laws and codes, often taking into consideration non-project factors. We think you probably understand some of this.

**City of Port Townsend comment:** The report calls for a "qualified professional". Can you expand on what constitutes a qualified professional (similar to the specificity provided in the RCW's for engineering geologist)? Does WDFW or the Department of Licensing maintain a list of "qualified professionals"?

**WDFW response:** There is a fairly wide range of designers active in the area of marine bank protection. Writing a specific list of qualifications is likely to exclude some and place a higher premium on others. In addition, someone qualified to design a rock revetment may not be the same person qualified to do beach nourishment. We do not maintain a list of qualified professionals.

**City of Port Townsend comment:** Length of the Document: Although very informative, will people read it? DOE staff encouraged brevity in SMPs. Perhaps this document will have an Executive Summary or an abbreviated version for "staff" or "for the homeowner"?

**WDFW response:** We have received similar comments and are working on ways to improve the accessibility. Please remember that this document is the first of its kind for Puget Sound and we have felt an obligation to provide as much background material that we can to create a standard of practice for, in particular, the newer soft techniques.

Thank you for your interest in the Marine Shoreline Design Guidelines and the SEPA review process. We hope that our comments above adequately address your concerns.

Sincerely,

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