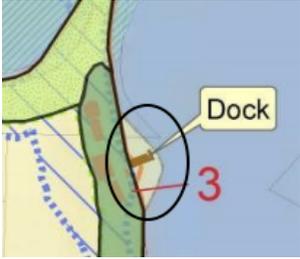Environmental Protection and Regulatory Programs (EPRP) Group Comments

Pacific Northwest National Laboratories (PNNL) values the opportunity to address comments to the City of Sequim on the Shoreline Master Program (SMP) 2021 update. PNNL comments are listed in tabular format below for clarity. Proposed additions are listed in blue, modifications are struck through and in red.

Number	Reference	PNNL Comment	Details
1	Figure 1-1 (p. 4)	Add: Figure 1-1 Shoreline	For consistency, clearly identify the South Spit marsh area as a tidal wetland like SMP does for Pitship marsh.
2	p. 12	To boating facilities definition, add: "Boating Facilities. Boating facilities include marinas, both backshore and foreshore, dry storage and wet-moorage types, covered moorage, boat launches, and marine travel lifts. Boating facility standards do not apply to docks serving four or fewer single-family residences or research applications."	Research applications should be exempt from the boating facilities definition. PNNL is a research entity and will continue to promote research in the future. Thus, boating facilities do not fit within the goals of PNNL.
3	p.12	Add mapping/additional information for Critical Saltwater Habitats or remove definition from draft SMP	Definition exists on p. 12; however mapping or full dataset for "critical saltwater habitats" are not included in draft SMP. A reference where to find the data would be helpful. The definition is listed; however, the term is not used within the draft SMP.
4	p. 26	Add definition for "New construction". It is mentioned on p. 26 in "5. No new construction should be allowed within the limits of the one hundred-year (100- year) flood plain that significantly reduces the flood or downstream storage….."	"New construction" is not explicitly defined by the SMP. Does this include building replacements within the same footprint?

5	p.33; Figure 5.1 (p. 34)	Add dock area to Research District map:	The area around the PNNL dock was left out of any designation. Land use in consistent with "Research District" and should thus be included into the "Research District" designation, as are the rest of the shoreline facilities. The PNNL dock is used for research purposes only. This would also reflect the correct boundary description listed on p. 39, which encompasses the dock area.
6	p. 41	"Urban conservancy designation protects and restores ecological functions of open space, flood plain and other sensitive lands where they exist in urban and developed settings, while allowing a limited variety of compatible uses, including but not limited to research activities which result in no-net loss of habitat function."	PNNL has historically conducted research within submerged aquatic vegetation habitats and wetlands to enhance habitat. Data are published and help stakeholders, including state agencies in making informed management decisions. PNNL wants to continue research and make sure the Urban Conservancy designation will not prohibit ongoing research.
7	Section 6.3.5, p. 84	Remove and add: "Uses and activities associated with Research and Development Facilities that are identified as separate use activities in this program, such as Marinas, Piers and Docks, Signs, Utilities, etc., are subject to the regulations established for those uses as applicable, in addition to the standards under this section. Research instruments and research installations to support research are excluded from the designation, as they are not considered development or facilities."	Clarify standards Research and Development Facilities have to abide by. Marinas are outside the scope of Research and Development Facilities.
8	Section 6.3.5, p. 84	"Any new development in the Research District is limited to expansion within existing building footprints and must expand vertically unless the project proponent provides a written statement with supporting documentation explaining why vertical expansion is not feasible."	PNNL would like clarity in SMP on what vertical development requirements are if the Research District is primarily allowed to expand vertically.