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Josh Peters  
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Mr. Peters:

I would like to respond to some of the comments and issues raised by the public comment letters on the Best Available Science Review that I completed to support Jefferson County's mandated review of its Comprehensive Plan and critical areas protections.

I want to emphasize that the recommendations made in my previous Best Available Science Review are minimum recommendations. These minimums represent what I consider "bottom line" protection standards. I do not feel that reducing stream buffers, for instance, to less than what was recommended, would fall within the range of Best Available Science. That is not to say, however, that there is not justification for larger buffers. In general, the larger the buffer, the more protection will be obtained for wetlands and fish and wildlife habitat.

To keep it simple, I recommended these "bottom line" protection standards, such as buffers versus recommending a range, which is what Best Available Science supports. Providing the "bottom line," I felt, would help focus public debate, instead of discussing the full range of buffer options and then facilitating debate at the Planning Commission. Specifically, I identified those areas where buffers need to be increased to be consistent with the range of Best Available Science.

In addition, my review was conducted in the context of the overall program that Jefferson County has in place, the current level and scale of development that exists in Jefferson County. The full range of regulatory protections for water quality, water quantity, fish and wildlife habitat all interact and together provide an interconnected protection regime.

For instance, Jefferson County, to my knowledge, is the only County that has adopted more protective stormwater standards promulgated by the Washington Department of Ecology in 2001. Approximately three-quarters of Jefferson County's land area is in public ownership, including Olympic National Park, with high quality protected habitat. Jefferson County has a multifaceted approach to habitat protection that includes large sections of lands designated for rural residential, forestry and open space.

Jefferson County, as part of developing a surface water management plan, has estimated existing and future development impacts from impervious surfaces. The County

anticipates development to lead to impervious surfaces surpassing 10 percent of the watershed area in only one watershed, the lower Chimacum Creek watershed. In some watersheds analyzed, development is anticipated to lead to less than two percent impervious surface in the 20-year planning horizon.

The comments that point to a particular standard, such as a wetland buffer standard, as being inadequate do not necessarily account for the wildlife protection standards, protection from stormwater impacts, and the mosaic of existing protected land in Jefferson County. The Best Available Science used in creating overall recommendations represents a series of papers and studies that identify, for example, how much habitat a blue heron would use. If the wetland buffer were the only protections that were available for the blue heron habitat, then the Jefferson County standard would be inadequate. If, for another example, the wetland buffer were the only protection from the negative hydrological impacts from stormwater, then the Jefferson County buffers would be inadequate. Neither of these situations is true in Jefferson County.

The protection standards for water resources, wetlands, and fish and wildlife habitat are interconnected. Thus, I believe that addressing each particular standard alone is not the appropriate context in which to conduct a review of environmental protection standards.

In summary, I hope this commentary provides additional context for my previous review of the Best Available Science for Jefferson County. I hope to see the recommendations adopted by the Jefferson BOCC that I made for increasing existing buffers for wetlands, for increasing fish and wildlife habitat conservation area buffers, for limiting development inside channel migration zones and protecting core wildlife habitat and habitat corridors.

If the County wishes a more extensive public debate to occur next year, then I would recommend a series of workshops with the Planning Commission, such as what Kitsap County has done. A debate about the science of fish and wildlife habitat buffers, wetland buffers, and other issues addressed in my previous report, could occur through that process. This will allow elected officials and Planning Commission members to hear the range of scientific findings and opinion from a number of specialists and experts, fully digest the science and policy ramifications involved, and then update fish and wildlife habitat protection standards based on a lengthy debate of the full range of issues involved.

Sincerely,



Dave Christensen

Former Manager, Jefferson County Natural Resource Division