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June 30, 2008

Brian Shea
Grays Harbor County
Planning and Building Division
100 West Broadway Avenue, Suite 31
Montesano, WA 98563-3614

Re: Critical Protection Area Code

Dear Mr. Shea:

Weyerhaeuser Real Estate Development Company (WREDCO) is submitting our comments in response to the proposed Critical Protection Area Code:

- Exemption for maintenance of existing utilities can be read to apply only within public rights-of-way. No specific mention of maintenance of other infrastructure, e.g. roads.

Recommendation: Exemption apply to maintenance of utilities within private roads and maintenance of private roads.

18.06.025 General Exemptions.

(D)

- (1) Normal and routine maintenance or repair of existing utility structures in a public right-of-way private road and the maintenance of private roads.*
- (5) Installation or construction in a public road right-of-way or a private road, and the replacement, operation, repair or alteration of all natural gas, cable communications and telephone facilities, lines, pipes, mains, equipment or appurtenances.*

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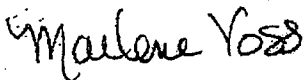
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- Other wildlife habitat. Draft can be read to require use of WDFW recommendations for priority species.

Recommendation: Draft be clarified to state that County will consider WDFW recommendations

Thank you for your time in considering our changes.

Sincerely,



Marlene Voss

/mv

enclosure