

# COMMENT RESPONSE SUMMARY – 10/16/2014

## MONTESANO SHORELINE INVENTORY AND CHARACTERIZATION

Source <sup>1</sup>	Comment	Response
KV, Aug.26 email	1. Please ensure the broader review from the identified technical experts (identified in your Public Participation Plan) is completed prior to issuing the final Inventory & Characterization report. I am unclear as to how this is being managed and have yet to see broad distribution of this document. Because I haven’t seen evidence that this is taking place, I am concerned that it will be overlooked. Please ensure this broader distribution is documented.	The SIC sent to TAC for comment on August 27, 2014. We asked that comments be returned by September 19, 2014. Comments were received from GHCOG and addressed in the final draft of the SIC.
KV, Aug.26 email	2. Can the document size, particularly the maps be reduced for easier download and quicker viewing? These are by far among the largest document files I have worked with on SMP updates and I am concerned about accessibility for the general public. The download time, on my well-supported state computer, took a significant amount of time.	Map sizes were reduced, and the map folio was separated into three PDFs.
KV, Aug.26 email	3. The report could benefit from inclusion of representative photos and maps inserted directly into the document to aid the reader in understanding the context and geography of the discussion.	Added map to body of document
KV, Aug.26 email	4. There seems to be some confusion between the text discussion of shoreline reaches based on land cover data and zoning, and the reach tables which describe “dominant land use”. This appears to be yet another data set from the Assessor?? Please clarify.	Added note to Table 8. Revised table heading to Primary Land Use.
KV, Aug.26 email	5. Information and an organized discussion about frequently flooded areas, including channel migration zones, is lacking. Please add a section on this topic.	Added section on frequently flooded areas. Added discussion of CMZ to Data Gaps
KV, Aug.26 email	6. We have a number of concerns about the proposed shoreline environment designations (SED). There appear to be a number of inconsistencies between the information in the reach analyses and functional assessments, and the proposed designations. In most cases, it appears the Comprehensive Plan designations and zoning dictated the proposed shoreline designations. We recommend general recommendations and guidance, including proposed designation criteria, be provided at this stage.	We have addressed concerns regarding the shoreline environment designations. Specific comments are addressed below.
KV, Aug.26 email	7. I recommend a copy of the existing shoreline designation map is included in the map folio (I am not suggesting digitizing the information, just providing the map). This may help inform the environment designation discussion as well.	A copy of the map is included in the Map Folio as Figure 15.1.
RM, cover	Need more maps, pictures.	Added map to body of document. Added photo showing pile wall construction at wastewater treatment plant, and figure to support discussion of the meander bend near Mary’s River lumberyard.
RM, p.v	This section is an unusual and fairly sparse collection of terms. It seems like a lot of additional terms could be included. (e.g. water-oriented, structures, wetland, associated wetland, etc.) Use SMA definitions whenever possible.	Expanded list and revised definitions to match SMA.
KV, p.v	I agree that this seems to consist of a few miscellaneous words. For example Udorthent is included but no other soil type. I recommend you either expand this or clearly define terms in the body of the document.	Expended list to include other key terms used in the narrative.
KV, p.v	This definition is not consistent with that in the Guidelines (WAC 173-26-020(16). Because this is a key shoreline modification, the correct definition should be used.	Revised definition of fill to match WAC.

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KV, p.v	As noted in my previous comment, now is the time to be using the definitions as set forth in the Guidelines. It is not useful to create new definitions for the Inventory & Characterization report which is intended to inform the development of new SMP policies and regulations.	Revised for consistency with Guidelines.
KV, p.v	From DNR (teacher's guide): <b>Surge Plain</b> —a unique area where tidal salt water surges or pushes fresh water out over wetlands.	Revised as recommended.
KV, p.2	I'm not sure what you are referring to here. The 2002 amendments to the SMA involved the \$\$ threshold for substantial development permits and agricultural activities. The SMA does not explicitly speak to "no net loss". The Shoreline Guidelines are where this term is used. These were adopted in 2003.	Revised accordingly.
KV, p.11	The shoreline planning area should assess the broader possible SMA jurisdictional area – including the entire 100 year floodplain. This will allow for a more informed policy decision by the city's decision makers about the optional extent of shoreline jurisdiction.	Clarified and added discussion of optional floodplain area.
RM, p.11	A general map showing the reaches would be useful here.	Added map of reaches to section.
RM, p.13, Table 2	Consider changing to water-oriented species. Many species are primarily associated with riparian areas without being primarily aquatic. (e.g. mink, common yellowthroat, heron, Townsend's vole, etc.)	Revised to be consistent with WAC173-26-201.
RM, p.13, Table 2	These are not typically considered hydrologic functions. They are water quality-related functions associated with specific soils and vegetation. Hydrologic functions include water storage and attenuating flow volume. You may wish to add Water Quality to this column; i.e.: Hydrologic/Water Quality Functions.	Revised accordingly.
RM, p.14 Table 3	See comments above	Revised heading as recommended.
RM, p. 15	This is an important point. The discussion should be augmented with a clarification on the difference between condition, function, and the landscape position that provide opportunity for the function to be actuated. For example, certain reaches of Sylvia Creek within the City will exhibit high ecological condition, but may provide limited functions due to the lack of deleterious inputs (e.g. Water quality functions).	Added discussion accordingly.
RM, p.16	In general, this table is rating based on condition, not function. Reaches are being scored high when they are not characterized by anthropogenic disturbances. However, as noted above in your text, absence of disturbance will result in some functions not being actuated.	Clarified in text throughout section.
RM, p.16	Consider this and the other yellow highlighted parameter. What would you score a floodway that is 60% of the area? Seems like some overlap in parameters. Perhaps you meant 20-50%?	There is intentionally overlap here. If the floodway is 60% it would be scored High or Moderate depending on whether there are large wetlands and backwaters present (high), or few wetlands and backwaters (moderate).
RM, p.16	This is an example where a score of "high" seems to contrast with the opportunity of a given water body to provide the listed function. If there are no problems, then either there are no inputs and this water body cannot "remove excessive nutrients and toxic compounds" or the water body is deficient in the structure and attributes necessary to provide the function. These are two completely different scenarios but the score does not help the reader understand which situation exists. Consider revising how this information is scored or scaled.	Comment noted. The criteria addresses whether there is an impairment (i.e., opportunity). Structure and attributes are assessed under vegetation and water exchange categories. The combination of scores is used to rank the reach based on both scenarios.
RM, p.16	Is there a quantitative standard that was used in determining high vs. moderate vs. low? Number of features per river mile, or???	The ranking is qualitative based on aerial images and best professional judgment.
RM, p.17	Please provide more background on the concepts that underpin this metric. How is connectivity qualitatively associated with the water storage function?	Clarified in table text.
RM, p.17	It would seem that attenuation of wave energy can be achieved by each of these shore forms. Not sure whether this is a valid metric.	Attenuation of wave energy, and sediment recruitment and transport are the primary physical processes that are altered by shoreline structures. Although its focus is on Puget Sound shorelines, Ecology's guidance on Soft Shoreline Stabilization is relevant to many large streams and lake shorelines. Bank armoring is a good indicator of impairment of flow and wave energy attenuation functions. Added to discussion before Table 4 and added relevant discussion to <i>Special Management Considerations</i> .
RM, p.17	See prior comment. This is a Water Quality function.	Clarified function category per previous comment.

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RM, p.18	See comment above. The % values do not make sense. Perhaps 25-50% was intended.	Overlap in percentages is intended. A key factor is the type of vegetation cover. Clarified in table text.
RM, p.18	These are fairly high percentages, given the relative prevalence of hydric soils and nature of soil mapping. Many non-hydric soils contain hydric inclusions that are not mapped.	Comment noted. Most reaches contain high percentages. The values seem appropriate for the geographic location and for conservatively estimating functions.
RM, p.29	These two are not SSWS.	Corrected in text.
KV, p.29	On the maps I've looked at it appears Sylvia Creek flows into the Wynoochee River. Is there a separate channel that also flows into the Chehalis?	Corrected in text.
RM, p.30	Examples of why? Please add text to support this conclusion: waste water treatment plant, etc?	Language revised in text.
RM, p.30	How is this use water-oriented? Does Mary's River do any business via the Chehalis R.?	According to the City, Mary's Lumber currently does not use the river for business operations, however the sawmill previously used the river for business operations. Text was revised accordingly.
RM, p.30	which "could" allow...however, such development may face significant permitting challenges when considering critical areas impacts and the No Net Loss requirement.	Agreed, however the possibility exists for construction or expansion of Highway 12 and the associated interchange.
KV, p.30	Other than passive recreation, it is unlikely that there could be much in the way of a water-oriented use in Reach 4.	Agreed. Please see previous comment as well.
RM, p.30, Table 5	Table is out of place. Should be moved up to relevant text.	Tables are placed on the next full page and sometimes bisect text where the formatting (page size or orientation) requires it. Herrera will review formatting of final PDF print version.
RM, p.32	Map displaying these?	Added to Figure 4 in map folio and referenced in text.
KV, p.32	This is a minimal discussion that deserves more attention. Not only should there be discussion about existing public access but also about the potential for new public access. Based on Map 4.1 Parks and Public Land, there are significant portions of publicly owned property along Upper Sylvia Creek (Reach 2) and along portions of the Wynoochee and Chehalis Rivers (Reaches 5 and 6). In the SED discussion section, it's stated that there are recreation trails in Reach 2. These should be discussed here and if these are city owned and maintained, there are likely maps depicting these trails. The City Forest maps I found online only depict that portion of City Forest in the block surrounding Lake Sylvia State Park.	Additional text added. Reference to trails changed to Reach 1. There are no trails in Reach 2.
KV, p.33	Fill is also the placement of material landward of the OHWM. Both are considered shoreline modifications. Please use the broader concept. (see the definition of fill in the Guidelines)	Revised accordingly.
KV, p.39	It would be helpful if there was a reference to the appropriate maps here.	Added reference.
RM, p.40	Move tables to end of section. Do not bisect text with tables.	See related comment RM, p.30, Table 5.
RM, p.40	Contrast this value with the narrative statement. "Upper Sylvia Creek, is also zoned City Forest, and is mostly characterized by woody wetlands (72 percent)." Which is correct?	Revised value and clarified in table notes. Added definition of woody wetland to the glossary.
KV, p.40	Is this "unclassified" by the Assessor or ??? Please clarify what "Dominant Land Use" means.	Added note in table. Changed 'unclassified to residential' to Very Low Density Residential in Reach 3. It is undeveloped residential land not elsewhere classified. Reach 4, Unclassified was changed to Commercial. Reach 5, Unclassified was changed to Recreation to reflect the WDFW boat launch. Changed dominant land use to primary land use.
RM, p.43, Table 9	Why are these Reaches repeated with different data? Do you mean to list Reaches 4-6 here.	Corrected.
RM, p.43, Table 9	?!	Verified that estimate is correct as stated.
RM, p.43, Table 9	???	Clarified land form

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RM, p.46	Frequently flooded areas: This is a significant critical area for the Chehalis River and fundamentally affects the land use in shoreline jurisdiction adjacent to the River. There needs to be a robust treatment of this CA, especially in consideration of the existing SMP requirements and FEMA concerns.	Added new section under <i>Critical Areas and Priority Habitat and Species</i> .
RM, p.47	Loss of vegetation reduces shade. Loss of steep erodible banks does not.	Revised accordingly.
RM, p.47	Table should be moved up to relevant section.	See related comment RM, p.30, Table 5.
RM, p.50, Table 11	Please explain this score. It does not seem to match the identified attributes of hydrologic storage and floodplain area in the I&C.  Does the floodplain storage associated with the river factor into this calculation? The floodplain in Montesano is an integral component of this river's hydrologic function and the absence of this available area would cause negative effects to downstream properties. This attribute is a fundamental benefit and provides a significant hydrologic function.	Revised score to "moderate" accounting for criteria that is met in both high and low ratings. Also, this reflects the functions related to the floodplain (Reach 4) and the benefits of connectivity with Reach 4.  Clarified in text regarding Reach 6.
KV, p.51	This statement may not be consistent with flood hazards and channel migration issues which haven't been adequately discussed.	Clarified statement. Added discussion here, as well as to the sections on potential conflicts and data gaps.
KV, p.52	Where is this located in Montesano?	Added statement regarding location of the tidal surge plain.
RM, p.53	How many? It appears that most development is outside SMA jurisdiction. Please provide more map detail.	Text revised to clarify. The land is classified as residential, but the majority of development is outside the jurisdiction.
RM, p.54	These analyses are in contradiction with the rationale for the proposed SEDs.	Revised text to clarify.
RM, p.55	Please provide map detail on this existing development.	Text added to clarify. Parcels are developed, but the structures are outside the shoreline jurisdiction.
RM, p.55	Wynoochee?	Clarified that it is within the floodplain of both the Wynoochee and Chehalis Rivers. The two floodplains are essentially indistinguishable at this location.
KV, p.56	Development in these areas will be challenging not only because of flood hazards but because of the significant presence of wetlands. Despite the Comprehensive Plan and zoning designations for these areas (Reaches 4-6), these are likely to be highly constrained, difficult and costly areas to develop. There are times when the environmental characteristics of an area may point to a need to make adjustments to existing zoning and Comprehensive Plan designations.	Comment noted. Added discussion of existing zoning and comprehensive plan under <i>Identification of Potential Conflicts and Effects on Ecological Function</i> .
KV, p.56	What is the likelihood that water-dependent uses will locate on either the Wynoochee or in the wetland complex of Reach 4? Perhaps a bit of discussion is merited here regarding the constraints on many standard water-dependent commercial and industrial uses (e.g. ports, marinas). For example, what are the river depths?	The City does not know of any plans, development is probably not likely in the near future. Added discussion under <i>Identification of Potential Conflicts and Effects on Ecological Function</i> .
KV, p.57	Channel migration zones?	Added discussion of channel migration zones.
KV, p.57	We have significant concerns about this section of the report and recommend that you consider deleting this until additional review and comment on the draft I & C report has been received from the technical contacts listed in your Public Participation Plan.	Comment noted.
KV, p.58	Based on the I & C, it's not clear why this designation is not discussed below in the recommendations. It may be an appropriate designation (or parallel designation) along upper Sylvia Creek for example. There may be other areas within the City that also merit this designation.	Natural was discussed; however, 1) Silvia Lake is a State Park that may have public access and water-oriented development planned. We have contacted Washington State Parks to get more information and we plan to discuss further with the City and CAC; 2) Upper Silvia Creek is part of an active commercial forest. It is regulated under the Forest Practice Act, which provides protection of riparian areas; and 3) the natural designation will be discussed further with the City and CAC members for other parts of the city.
KV, p.58	This would be much more informative if a map and discussion of existing environment designations was provided. I recommend a copy of the designation map for the current SMP be included in the map folio because this is a frequent question from citizens.	Added map (Figure 15) to Map Folio and referenced in text.

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KV, p .59	The criteria listed in the WAC are what local SEDs must be consistent with. I recommend you list the WAC criteria first, followed by the information developed in the I & C to help demonstrate the consistency.	WAC references moved to (1) for all reaches.
KV, p.60	See comment above about the Natural designation.	More information was provided and text was added and revised.
KV, p.60	Are these city trails that are maintained? These weren't discussed anywhere in the extremely brief public access section of the report.	The Sylvia Creek trail is partially located in Reach 1. There are actually no trails in Reach 2. Reference to the trail was moved to the Reach 1 discussion.
RM, p.60	There appears to be a significant “disconnect” between portions of the section addressing proposed SEDs and the sections that describe the ecosystem functions of the respective reaches (Functional Assessment, p. 48). Several of the proposed SEDs would not be adequately protective of the existing ecological functions described in the I&C and would not likely achieve no net less. Per WAC 173-26-211(4) (b), In delineating environment designations, local government should assure that existing shoreline ecological functions are protected with the proposed pattern and intensity of development. Such designations should also be consistent with policies for restoration of degraded shorelines.	As mentioned before, the developed portions of the parcels that intersect the shoreline jurisdiction are located outside of the shoreline jurisdiction. Portions of the reach were changed to Urban Conservancy to provide additional ecological protection.
RM, p.60	Large areas of this reach do not meet the criteria for this designation. Specifically, the area between the highway and Pioneer Avenue W. is characterized by a large farm, wetlands, and otherwise undeveloped land. In addition, it does not appear that many, if any, residences within Montesano city limits are actually within shoreline jurisdiction. Establishing environment designations by zoning or comp plan alone is not consistent with WAC. The I&C describes Reach 3 as: Lower Sylvia Creek, generally scoring (high), the same as Reach 2 (31 points), although functions provided are someone what different due to a different vegetative structure (emergent and shrub dominated), and presence of wetlands. Although most development appears outside of the mapped shoreline jurisdiction, the reach has complex hydrology and wetland conditions that add importance to field delineation if development is proposed. Impairments or altered conditions may be associated with ditches, road crossings, and potentially runoff to the extent that it enters the reach from adjacent development outside the shoreline jurisdiction. Restoration is likely an appropriate objective for this reach.	Portions of the reach that are not platted and/or used for agricultural purposes were changed to Urban Conservancy.
RM, p.60	Please demonstrate this via mapping. Two of the largest parcels in this reach are exclusively agriculture.	Portions of the reach that are not platted and/or used for agricultural purposes were changed to Urban Conservancy.
RM, p.60	Please demonstrate this via mapping.	Correct, this is not the case. Parcels may be developed, but development is often outside the shoreline jurisdiction. Revised text.
KV, p.61	Within shoreline jurisdiction, this appears to be minimal	Correct. It is a very small percent, almost negligible. Text added to clarify.
KV, p.61	I don't see where this is located within this reach unless it is that area to the west of Sylvia Creek that may have a miniscule amount of shorelands. This should be clarified both here and earlier in the discussion regarding this reach. It appears the percentage of this zoning in this SED is nearly irrelevant.	Correct. It is a very small percent, almost negligible. Text added to clarify.
RM, p.61	Please provide evidence that these areas are platted.	The vacant areas are not platted. Portions of the reach that are not platted and/or used for agricultural purposes were changed to Urban Conservancy.
RM, p.61	Please provide more detail on which portions of this reach meet the High Intensity criteria. As noted in the I&C above: “The area is mostly comprised of wetlands and, as it lies within the floodplain, it is subject to the Chehalis River flooding in the winter and spring.” See also p. 51. The existing ecological conditions do not appear to support this designation throughout most of the reach. Natural designation may be appropriate for the majority of this reach. It currently has that designation.	We have changed the designation in this reach to be Urban Conservancy, or Urban Conservancy and Natural. Final SED will depend on City and CAC input.
KV, p.61	This is the key piece of information, and the City will need to demonstrate how future impacts are avoided first. Often avoidance and assuring no net loss is best accomplished through appropriate shoreline environment designations.	Comment addressed through removal of High Intensity shoreline environment areas.

Source <sup>1</sup>	Comment	Response
RM, p.63	This designation is inconsistent with Inventory of ecological function and existing environmental conditions (see p. 51) for the majority of the reach. Site-specific existing uses may meet this designation, but not reach-wide. Undeveloped and ecologically intact areas appear to meet Urban Conservancy criteria.	Agreed. The portion of the reach containing the wastewater treatment plan is designated High Intensity. The remaining portion of the reach was changed to Urban Conservancy. Present SMP designation is Conservancy.
KV, p.63	These two sentences directly conflict with each other. Areas that are “largely comprised of wetlands and within the 100-year floodplain” are often the least suitable for development. Avoidance is difficult and mitigation costs would be extremely high.	Text added to clarify that the site is likely not suitable for further development beyond its existing use.
KV, p.63	Based on the first statement above “The existing land use pattern is primarily open space”, this reach does not “currently support high-intensity uses”. In addition, there is significant wetland acreage (60% per Table 8) making it challenging at best for development.	Text added to clarify that the wastewater treatment plant is designated High Intensity.
RM, p.63	This reach contains extensive critical areas including Fish & Wildlife Conservation Areas, wetlands, and Frequently Flooded Areas. Portions of the reach may meet this criterion where such existing land uses occur. However, the remainder of the reach appears inappropriate for development that is not resistant and adapted to frequent flooding.	Shoreline environment designation was revised to include High Intensity and Urban Conservancy. Mary’s Lumber Mill site is designated High Intensity, the remainder of the reach is now designated Urban Conservancy.
KV, p.64	In looking at aerial photos, I agree that there is a significant industrial site in this reach. However, there is also a relatively undisturbed area just to the north of the mill site which includes the outlet to the drainage from the eastern portion of the reach 4 wetland complex. This area likely has high function and should get a more protective designation.	See previous comment.
TAC, Comment #1	Page 7, Inventory Data & Information Sources. Grays Harbor Council of Governments should be on the list of sources	Text added to report.
TAC Comment # 2	Reach Analysis, Wetland Complex (Reach 4) adjustment. a. Is it known which water system the Wetland Complex is associated with – Sylvia Creek or Chehalis River? Or both? If the Wetland Complex is associated with more than one river system consider creating two reaches for the Wetland Complex or; b. Consider removing the western part of the Wetland Complex, which appears to be associated with Sylvia Creek, from the Wetland Complex into the Lower Sylvia Creek (Reach 3) and change the potential shoreline environmental designation to Shoreline Residential. This would be consistent with current land use and zoning designation.	The wetland complex is primarily associated with the Chehalis River. For the purposes of the characterization, it was delineated as a single reach based on characteristics, geomorphic processes and functions, and association with the Chehalis River. The shoreline environment designations were revised based on these and Ecology’s comments.
TAC Comment # 3	Table 8. Summary Shores Reaches Geological Hazards, Reaches 2, 3, 4, 5, & 6 are noted as ‘Mapped tsunami inundation zone’. The currently published tsunami zone in Grays Harbor coast only reaches as far east as Junction City just outside the City of Aberdeen. Is it general that all areas within the 100 year flood zone are included in the tsunami inundation zone? If the tsunami inundation zone reaches Montesano it will most likely be restricted to the Chehalis River flood way. Therefore, suggest reconsidering: a. Upper Sylvia Creek (Reach 2) as it is highly unlikely that it is in the inundation zone. This area is assigned in the 100 yr flood due to the flooding of Sylvia Creek. b. Lower Sylvia Creek (Reach 3) same reason as above. The map folio does not include any tsunami inundation zone maps. Please add the tsunami inundation data for the city of Montesano to the map folio.	Clarified in report text. For areas where tsunami inundation modeling has not been completed, including Montesano, the 25-foot topographic contour line is used to approximate potential tsunami inundation (Wood and Soulard 2008). The GIS data for the 25-foot contour was not available for inclusion in the map folio.
TAC Comment # 4	Table 9. Shoreline Physical Processes Reaches 4, 5, & 6 are missing from this table, or not properly labeled.	Corrected headings.



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TAC Comment # 5,a	Shoreline Designations comments. Upper Sylvia Creek (Reach 2) may be better suited for a potential shoreline environmental designation of Natural. i. High functional assessment (page 44) “protection would be appropriate for this reach” ii. Shoreline area is relatively free of human influence. iii. “Commercial forestry may be allowed as a conditional use in the "natural" environment provided it meets the conditions of the State Forest Practices Act and its implementing rules and is conducted in a manner consistent with the purpose of this environment designation” this is consistent with current zoning and land use (WAC 173-26-211 (5)(a)(ii)(D)).	Comment noted. The designation was left as Urban Conservancy because Upper Sylvia Creek is part of an active commercial forest. In addition to the SMP, this area is regulated under the Forest Practice Act, which provides protection of riparian areas and ecological function.
TAC Comment # 5,b	Wetland Complex (Reach 4) as stated in 2. b. the western section of the Wetland Complex, may be better suited for a potential shoreline environmental designation of Shoreline Residential. i. This would be consistent with current land use and zoning designation.	Comment noted. The shoreline environment designations were revised based on these and Ecology’s comments.
TAC Comment # 5,c	Wynoochee River (Reach 5) may be better suited for a potential shoreline environmental designation of Urban Conservancy. i. High functional assessment (page 46) “An overall good score for functions in combination with limited development indicates that protection or restoration may be appropriate objectives for this reach” ii. There are known associated wetlands of both Freshwater Emergent and Freshwater Forested/Shrub Wetland, making this reach less viable for intensive development. iii. The reach is within the 100 year floodplain of three river systems Wynoochee River, Sylvia Creek, and Chehalis River, making it more susceptible to flooding and risky for intensive development. iv. As this reach is not highly developed it is a good fit for preservation, restoration, open space, and/or recreation. Much of the property in this reach is owned by the city of Montesano and opportunity for public access to the shoreline, which “Increase public access to publicly owned areas of the shorelines” is a preferred use of the shoreline (RCW 90.58.020). v. This reach supports several WDFW Priority Habitat Fish Species.	Comment noted. The shoreline environment designations were revised based on these and Ecology’s comments. The portion of the reach that does not contain the wastewater treatment plant was changed to Urban Conservancy.
TAC figure comment 1	The color air photo as a backdrop for all figures is distracting. Consider using a parcel background, blank, or a black and white background in some figures. In particular Figures 5.1, 5.2, & 5.3 Land Use the color photo reduces the readability to 0 on the land cover designations. The Floodplain & Wetland maps are also very difficult to read with a color photo background.	Agreed. Figures revised.
TAC figure comment 2	Figures 4.1 & 4.2, Parks & Public Land Do a closer check on the Parcel ownership in the Chehalis River Reach, near the boat launch. a. There are two parcels for Mary’s River Lumber Co. that appear to be coded as Public Land ‘Municipal’ b. The Boat launch is not coded and should be Washington Dept of Fish & Wildlife, just south of Mary’s River	Fixed WDFW boat launch parcel. Verified the Mary’s Lumber question with the City. It does own the parcel.
TAC figure comment 3	Figures 9.1, 9.2, & 9.3, Shoreline Modifications Shoreline armoring does not appear on the mapped modifications. This is an oversight. There are new armoring in the Chehalis River and Wynoochee River Reaches at both Mary’s River Lumber Co. and the City Wastewater Treatment plant.	Information obtained from the Chehalis River Basin Flood Authority and added to the figures. Waste Water Treatment Plant: approximately 630 feet of the 1,482 foot flood protection levee is in shoreline jurisdiction. Mary’s River Lumber has a 1,565-foot flood protection levee. Added discussion of the shoreline armoring to the <i>Shoreline Modifications</i> section.

<sup>1</sup> KV = Kim Van Zwalenburg, Ecology; RM = Rick Mraz, Ecology; TJ = Theresa Julius, Grays Harbor Council of Governments