

Franklin County Shoreline Master Program (SMP) Periodic Update

COMMENTS AND RESPONSES

Prepared April 21, 2023

		Comment	Response
1.	<u><i>Robert Sloma, Coleville Tribes, via email on 4/6/2023</i></u>	Upon review of the proposed updates to the Franklin County Shoreline Master Program, the Confederated Tribes of the Colville Reservation Tribal Historic Preservation Officer has no substantive comment in regard to cultural resources.	Thank you for your review and comment.

<p>2.</p>	<p><u>Elizabeth Torrey, Washington State Department of Fish and Wildlife, via emailed letter on 4/13/2023</u> (WDFW)</p>	<p>Thank you for the opportunity to comment on the Shoreline Master Program (SMP) update for Franklin County. The Washington Department of Fish and Wildlife (WDFW) provides our comments and recommendations in keeping with our legislative mandate to “perpetuate fish and wildlife” and their habitats —a mission we can only accomplish in partnership with local governments.</p> <p>The following are the sections that WDFW believes would benefit from further revision:</p> <ul style="list-style-type: none"> • Page v: Revise the definition for HPA as follows: “Washington State Hydraulic Project Approval Permits”. 	<p>Revised as suggested.</p>
<p>3.</p>	<p>WDFW</p>	<ul style="list-style-type: none"> • 18.16.040(A)(2)(a): Revise as follows: “Washington State Hydraulic Project Approval Permits (HPA)”. 	<p>The correct location is 18.16.040(B)(2)(a). Revised as suggested.</p>
<p>4.</p>	<p>WDFW</p>	<ul style="list-style-type: none"> • Table 18.16.210(B): We notice that the buffers listed in this table are not consistent with the buffers listed in the 2023 CAO update. In the CAO update, type S watercourses are assigned a 250’ riparian buffer, which WDFW commends. This table (18.16.210B) has a variety of undersized riparian buffers listed depending on designation. None of the listed buffers are 	<p>Comment noted. The buffers were approved by Ecology during the last comprehensive update in 2015. No changes were</p>

		consistent with the CAO nor with Best Available Science. <u>We request that this is rectified, and buffers are consistent with the 250' width listed in the 2023 CAO.</u>	contemplated during the 2023 periodic review.
5.	WDFW	<ul style="list-style-type: none"> • Table 18.16.210 Footnote 2: According to the newest Best Available Science, specifically Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications (WDFW, 2020), these measurements should occur from the outer edge of the CMZ whenever possible. WDFW recognizes that in some instances, S-designated watercourse riparian zones cannot realistically begin at the edge of the Channel Migration Zone. However, in locations where this is realistic, such as rural or undeveloped locations, the measurements should begin at the CMZ. Only when it is impossible to measure from this benchmark would it be appropriate to reduce measurements to the OHWL mark. The Department of Ecology provides resources for CMZ estimation. 	Comment noted. This may be further discussed in future updates.
6.	WDFW	<ul style="list-style-type: none"> • 18.16.260(G)(5): WDFW recommends that priority/emphasis be given to gravel instead of pervious paving. In our experience, pervious pavement functions as intended for only a very short amount of time. Within a season or two after installation, dust, dirt, moss, and other such debris enters the interstitial spaces of the pavement, reducing or even eliminating its porosity. It is virtually impossible to clean or restore the pervious nature of this material except at the surface level. Therefore, porous pavement does not function as intended, and gravel or other such material is a much better choice, especially over large surface areas where rain and other water infiltration needs to 	Comment noted. We revised to add gravel as an option: "gravel or pervious pavement"

		be maintained.	
7.	WDFW	<ul style="list-style-type: none"> • 18.16.350(C)(6): We request a new bullet point in this section which outlines the need to evaluate potential dredging impacts to fish life. Juvenile lamprey, a native fish of ecological and cultural importance, utilize sandy/mucky material frequently targeted for dredging as part of their juvenile rearing and other life history stages. Dredging projects often have a distinct possibility of impacting or causing fatalities to this specific type of fish. Additionally, dredge spoil spillage also has the possibility of impacting native PHS-listed freshwater shellfish, which are known to occur in the rivers of Franklin County. There are realistic, easy-to-implement methods of reducing impacts to shellfish and lamprey by making operational changes to the dredge plan. <u>WDFW requests that fisheries impacts be evaluated when applicants propose dredge projects and the subsequent spoil disposal.</u> WDFW is available to offer technical assistance to help applicants accomplish these objectives. 	Revised 18.16.350(C) and added a new subsection (5) which adds as a submittal requirement: <i>An assessment of potential impacts to fish, freshwater shellfish, and ecological functions or processes from the proposal.</i>
8.	WDFW	<ul style="list-style-type: none"> • 18.16.420(B)(2): WDFW would like to request additional information on how Franklin County will decide which sites have “fragile and unique shoreline conditions” including “high-quality...wildlife habitats.” How will this be evaluated, and by whom? 	Comment noted. No changes proposed at this time. The text explains that fragile and unique shoreline conditions include “high quality wetlands and wildlife habitats.”
9.	WDFW	<ul style="list-style-type: none"> • 18.16.560(C)(8): WDFW is concerned that up to 50% of a riparian buffer may be reduced without any requirement for 	Comment noted. No

		mitigation. This should be corrected and appropriate mitigation should be required, otherwise, this practice will result in net losses of riparian areas.	changes proposed at this time. Previously approved by Ecology during the 2015 comprehensive review.
10.	WDFW	<ul style="list-style-type: none"> • 18.16.860: We suggest including a reference to the term “watercourse,” as both “stream” and “watercourse” have identical definitions and are used interchangeably. 	Comment noted. No changes proposed at this time.
11.	WDFW	<ul style="list-style-type: none"> • We suggest adding a definition for the term “Stream or Water Type.” Suggested wording is: <ul style="list-style-type: none"> a. "Stream or Water Types" are fully defined in WAC 222-16-030. An abbreviated definition is provided below, but the full WAC definition is adopted and applies: <ul style="list-style-type: none"> i. "Type S Water" means all designated "shorelines of the state." ii. "Type F Water" means streams other than Type S Waters that contain fish habitat or are diverted for certain kinds of domestic use or for use by fish hatcheries. iii. "Type Np Water" means streams that are perennial nonfish habitat streams. iv. "Type Ns Water" means streams that are seasonal, nonfish habitat streams, which are physically connected by an above-ground channel system to Type S, F, or Np Waters. 	Comment noted. No Changes proposed at this time. These types are not differentiated in the SMP.
12.	WDFW	<ul style="list-style-type: none"> • We suggest adding a definition for the term “Riparian Management Zone.” Suggested wording for this definition is: 	Comment noted. No

		<p>"Riparian management zone(s)" or "RMZ(s)" is a scientifically based description of the area adjacent to rivers and streams (see "riparian") based on the site potential tree height conceptual framework. It is the area that has the potential to provide full ecological function for bank stability, shade, pollution removal, contributions of detrital nutrients, and recruitment of large woody debris.</p>	<p>changes proposed at this time. A Riparian Management Zone is not included in this SMP, so no definition is needed.</p>
13.	<i>WDFW</i>	<ul style="list-style-type: none"> • Thank you again for the opportunity to comment and participate in this important update process. Please contact me to discuss WDFW's recommendations or any of the other comments presented within this letter. 	<p>Thank you for your comments.</p>
14.		<i>No further comments</i>	