

Date: April 23, 2018

Subject: Comments on Franklin County Draft Comprehensive Plan, Natural Element

From: Debbie Berkowitz and Rick Leaumont, Lower Columbia Basin Audubon Society

Thank you for the opportunity to comment on the Comprehensive Plan Natural Element.

**Natural Element text:** (underlines are suggested additions)

1. P. N-1 2<sup>nd</sup> intro paragraph. “All five critical areas exist in the County and protection and restoration of these areas is necessary for water quality and quantity, soil health, protection of habitat and its associated fish and wildlife, and the prevention of hazardous conditions....” I.e., fish & wildlife habitat is a component of critical areas that should be included.
2. P. N-1 Intro paragraph – in addition to critical areas, what about shorelines and natural areas? They are an important component of the Natural Element. Possible wording: The natural setting of Franklin County comprises natural areas, shorelines, and critical areas within the County. The County uses the best available science to develop regulations to protect the functions and values of these areas. [since BAS is a requirement of the RCW/WAC.]
3. P. N-5 Surface Water. “Water from the Columbia River is used for ....tribal treaty commitments, fish and wildlife needs, and .... “ I.e., fisheries and wildlife in general, not just salmonids.
4. P. N-5 Surface Water. Would be useful to mention how many miles of shoreline meet the jurisdictional criteria of the Franklin County SMP and which rivers are Shorelines of Statewide Significance.
5. P. N-5 Surface Water. Suggest adding info about the rivers and coulees and lakes. E.g., The Columbia, Snake, and Palouse rivers and the Esquatzel Coulee/Washtucna Coulee (others?) provide a water source for aquifer recharge areas and provide floodplain, wetland, and fish and wildlife habitat. Many indigenous wildlife species depend on these river and coulee corridors for cover and other sustenance essential to their life cycles. These waters of the state are protected under shoreline or critical area protections.
6. P. N-12 It would be useful to label the start of the critical area discussion on P. 12 with a ‘super heading’ of ‘Critical Areas’ and then include the ‘Habitats and Species’ (or Fish and Wildlife Habitat Conservation Areas), ‘Wetlands’, ‘Floodplains’ as subheadings under ‘Critical Areas.’
7. P. N-12 (last paragraph). “FWHCAs are established and mapped to protect habitats for federal or state endangered, threatened, sensitive, candidate, and priority species of fish, wildlife or plants,” following best available science.
8. P. N-13. Is there an edition of the Washington Environment Atlas that’s later than 1975? I haven’t seen reference to this in other CAO’s. They mainly reference WDFW’s PHS list.
9. P. N-13 FWHCAs in the County – references should be made to the Juniper Dunes Wilderness Area and to the portion of the Hanford Reach National Monument that lies in Franklin County. What other areas are important to protect – based on input from WDFW, Corps, USFWS, and citizen input?
10. P. N-13 I’d like to see a discussion of how natural habitats are at risk and how they will be protected in the future. As an example: “Biological resources in the County are threatened by development pressure, expansion of UGAs, farming, recreational, and other activities. Much of the native shrub steppe habitat has been eliminated and what remains is being fragmented, resulting in declines of native wildlife species. Declining water quality has also impacted aquatic species. Protection of these priority habitats and fish and wildlife species should be pursued under a federal, state, and local partnership. Priority habitats on existing public lands should be conserved, with additional purchases, exchanges, or conservation easements being used to connect these priority habitats into functional systems. Riparian and wetland environments should be conserved and monitored for protection and enhancement.”
11. P. N-16 (1<sup>st</sup> paragraph under Wetlands). The wetlands definition is incomplete; it should be stated in its entirety. I.e., “Wetlands are those areas that are inundated or saturated by surface water or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include

swamps, marshes, bogs, and similar areas. Wetlands do not include those artificial wetlands intentionally created from nonwetland sites, including but not limited to irrigation and drainage ditches, grass-lined swales, canals, detention facilities, wastewater treatment facilities, farm ponds, and landscape amenities or those wetlands created after July 1, 1990, that were unintentionally created as a result of the construction of a road, street, or highway. Wetlands may include those artificial wetlands intentionally created from non-wetland areas to mitigate the conversion of wetlands.” The non-definition parts of the first paragraph should be separated into a separate paragraph.

12. P. N-16 (3<sup>rd</sup> paragraph under Wetlands). Some of the areas mentioned in the first sentence of this paragraph should be considered regulated wetlands; some (like stock ponds) are not. A wetland is considered artificial, and not subject to state or local regulation as a wetland, only if it meets both of the following characteristics: (1) Intentionally created and (2) Formerly non-wetland (upland) site. In irrigated agricultural areas, wetlands can result from localized conditions (e.g., a leaking irrigation ditch) or from a region-wide rise in groundwater resulting from regional irrigation projects. These types of wetlands are regulated by state wetland law and cannot be filled or drained without appropriate permits and mitigation. However, if the irrigation practices that led to the incidental wetland creation are changed (e.g., through implementation of water conservation practices), and the wetland dries up and no longer performs wetland functions, then no mitigation is required.
13. P. N-17. Floodplain discussion should be separated from wetlands since they are a separate critical area. Frequently flooded areas. Is there any discussion about constraints on development in a floodplain/floodway? (e.g., WDOE’s Floodplain Management in the State of WA for examples/suggestions.?)
14. P. N-6,7. CARA’s should be discussed under Critical Areas or at least referenced back to “Water Cycle.” What is Franklin County doing or proposing to do to improve groundwater contamination in CARAs? How well is groundwater contamination being monitored throughout the County?
15. P. N-3. The discussion on “Geologically Hazardous Areas” should be referenced under Critical Areas. Seismic hazard areas are also considered Geologically Hazardous Areas. Suggest you elaborate on what you mean by “special consideration” when development occurs? Also, are there advantages to leaving some of these areas undeveloped? For example, some of these areas that are difficult to develop may also provide good habitat for wildlife and could help with connectivity of habitat.

**Table on Franklin County Comprehensive Plan Goals, Policies and Strategies:** We’d suggest replacing this table with Goals #1 thru #5 and associated policies as described below (this incorporates a number of the goals and policies in the original table):

Goal#1: Promote the protection, conservation, and restoration of natural areas, shorelines, and critical areas as unique assets to the community and provide non-motorized public access to public lands for enjoyment of such areas based on the ability of the resource to support the use.

Policy #1. Use the critical areas ordinance (CAO), shoreline master program (SMP), the state environmental policy act (SEPA), and other ordinances, as applicable, to designate and protect the critical areas and natural environment. These ordinances will be updated according to the best available science.

Policy #2. Consider the goals and policies of the SMP as part of this Comprehensive Plan. Encourage development of water-oriented recreational, cultural, and commercial facilities in certain shoreline locations, consistent with the SMP and its criterion of no net loss of ecological functions, to enhance and diversify community recreational resources and its attractiveness to tourists.

Policy #3. Ensure public access to shorelines on public land, subject to regulations protecting public safety, sensitive habitat areas, and wildlife.

Policy #4. Identify rivers, streams, creeks, natural drainage ways, lakes, wetlands, riparian habitats, and fish and wildlife habitat conservation areas and protect their functions and values.

Policy #5. Encourage public agency acquisition of natural areas of scientific, research, and educational significance for public benefit.

Policy #6. Identify and designate habitats of local importance to protect locally important habitats and species under the County CAO.

Policy #7. Integrate natural areas and critical areas into a linked pattern of open lands where feasible to serve multiple open space functions such as buffers, visual resources, and wildlife habitat corridors and connectivity, specifically maintain connectivity of shrub steppe habitat.

Policy #8. Develop an integrated pedestrian trail system to provide access and linkages between natural features, based on the ability of the resource to support the use.

Goal #2. Consider the goals and benchmarks and adaptive management of the Voluntary Stewardship Work Plan in agricultural areas as part of the Comprehensive Plan.

Policy #1. Prevent the degradation of functions and values of critical areas existing as of July 22, 2011 in agricultural areas at the watershed level.

Policy #2. Maintain and enhance agricultural viability.

Policy #3. Voluntarily enhance critical areas in agricultural areas through promotion of incentive-based measures.

Goal #3. Protect life and property and avoid or mitigate significant risks to public and private property and to public health and safety that are posed by frequently flooded and geologic hazard areas.

Policy #1. Limit development in areas with higher risk for natural disaster or geologic hazard unless it can be demonstrated by the project proponent that the development is sited, designed, and engineered for long term structural integrity and that life and property on- and off-site are not subject to increased risk as a result of the development.

Policy #2. Regulate development in frequently flooded area in accordance with the National Flood Insurance Program and WDOE guidelines.

Policy #3. Prevent developments within floodways and inherently unstable slopes as they are not suitable for developments.

Policy #4. Locate and designate lands subject to natural disasters and hazards for uses which avoid or minimize exposure of life and property to risk.

Policy #5. Work with the applicable agencies to update the County FIRM mapping and adopt a Digital Mapping system (D-FIRM).

Policy #6. Support hazard mitigation planning and implement adopted mitigation initiatives.

Goal #4. Protect and enhance surface water and groundwater quality for human health, drinking water supply, and to meet water quality standards.

Policy #1. Restrict development that significantly degrades or depletes surface waters or groundwater or site and design developments to avoid, minimize, or mitigate such impacts.

Policy #2. Protect surface and groundwater quality as a resource essential to the public health, safety and welfare, economic growth, and prosperity of the County.

Question for policy #2. Is the multi-county groundwater monitoring program sufficient to monitor and protect all CARA's?

Policy #3. Establish standards for the retention, recharge, and treatment of stormwater runoff channeled from impervious surfaces.

Policy #4. Support the Benton-Franklin Health District to develop and implement septic tank and drain field standards that protect surface and ground water quality and human health.

Policy #5. Encourage educational programs and voluntary efforts of agricultural producers, processors, irrigation districts, and municipal users to responsibly manage return flows to improve surface and ground water quality.

Goal #5. Development through appropriate design should protect natural features such as rivers, shorelines, and steep slopes.

Policy #1. Development should be sensitive to existing topography, landscape, and critical areas, and should avoid, minimize, or mitigate environmental impacts.

Policy #2. Lighting should be designed so as to promote public safety as well as to promote “Dark Sky” principals.

Policy #3. Minimize the impacts of development to property owners while not adversely impacting critical areas by using density bonuses, clustering, and other means of compensation as appropriate for the protection of critical areas.

**Other general comments:**

1. Original goals/policies #4-6. Shouldn't these be under 'Utilities Element'?
2. Recommend the draft plan be submitted to county legal counsel for review prior to finalizing the draft.
3. Recommendation has been made to delete the discussion on soils on P. N-7 thru N-12. The recommendation noted that this information was unnecessary. The recommendation also stated that it might still be included as an appendix. We would like to commend the planning staff for the excellent write up on county soils. This information may be redundant to planning commissioners who are involved in agriculture but it is a revelation to most of the public. We highly recommend that the information on P. N-8 through the middle of P. N-9 (up to the paragraph beginning with “In the 1990's...” be retained in the body of the plan, either in this element or under the “Resource Lands Element” since it is related to agricultural lands. The soils descriptions beginning at the bottom of P. N-9 through P. N-12 could be moved to an appendix but definitely should be retained in the overall planning document. Having this information available to the public will enhance the plan's ability to aid all parties in understanding the importance of the various soil types and their impact on suitability for crops and land uses.
4. Agriculture is a fundamental part of our county's economy and culture, but we are also blessed with exceptional natural beauty, wildlife habitat, and recreational opportunities. We should craft a plan that promotes harmony, while protecting agriculture, the environment, our culture, and recreation.