

April 4, 2016

Dear Elizabeth Chamberlain and Jeremy Sikes,

The Staff Report on the Shoreline Master Program Update (IV. Conclusions) states:

The City of Walla Walla's approach to updating its Shoreline Master Program is to protect Mill Creek and the shoreline environment; recognize Mill Creek within the City is a flood control channel; there is substantial existing development along the corridor; and portions of Mill Creek are piped through downtown. The proposed environmental designations take into account existing development patterns as well as the underlying zoning or future land use designations.

This approach meant in practice that the Update simply ratified existing conditions along the Mill Creek Corridor using existing City zoning as its only guide to land use. The existing form of the Flood Control Project, with a concrete channel through most of the City and partially undergrounded in the downtown ("piped", in the language of the Update) is taken to be as an established, irreversible fact for the 20-year planning projection of the Update.

While it is certainly true that the need to maintain flood protection is and will continue to be a significant factor shaping urban form along Mill Creek in Walla Walla, the fact is that City plans for some time have called for re-examining the existing form of the vintage 1942 Flood Control Project:

- We look at Walla Walla Urban Area Comprehensive Plan Policy ENR 9, which calls for completion of a "Mill Creek Corridor Plan...with a focus on the opportunity to 'daylight' Mill Creek in the Downtown."
- We know that there is a general recognition that, due to its age and insufficient maintenance, Flood Control Project infrastructure is badly deteriorated. Design and engineering criteria for urban flood control have changed radically since Project infrastructure was designed in

the 1930s, and that along with new requirements for environmental review mean that existing concrete channels and other infrastructure cannot simply be repaired and reinforced. Environmental considerations alone mean that it would never qualify for federal funds.

- City infrastructure related to the Flood Control Project is also badly deteriorated and partially unusable. City parking lots built over the “piped” Flood Control Project are in danger of collapse and portions have been closed. Two bridges over the channel can no longer be used by heavy City vehicles such as garbage trucks.
- The City itself is a partner with the Downtown Association and other organizations in a request for federal funding to study how to redesign and rebuild the Flood Control Project.
- In 2014, 2015 and we’ll see it again this year, where a coalition of civic organizations with the City of Walla Walla brought a Washington State University Landscape Architecture Class to Walla Walla to study how to re- envision the Flood Control Project. The class has given two well-attended public workshops on how Mill Creek in Walla Walla can be reconfigured as a civic amenity. Presentations were also made to the City Council and top City staff.

The guidelines for the Master Program (WAC 173-26-186) require local governments “to evaluate and consider...reasonably foreseeable future developments.” Given the considerations mentioned above, it was and is reasonably foreseeable that the Mill Creek Flood Control Project will have to be redesigned and rebuilt within the 20-year time horizon of this Update. The Update therefore appears to violate the Guidelines in that it does not “evaluate and consider” one major development within Walla Walla: the necessary replanning and reconstruction of Mill Creek flood control and related infrastructure according to modern criteria within the 20-year time horizon of the Update.

The Guidelines (173-26-191) say that “Shoreline master programs are both planning and regulatory tools.” This one, unfortunately, is nearly entirely a

regulatory tool and ignored “planning” including policies in its own Walla Walla Urban Area Comprehensive Plan.

It is probably true, as the staff report states, that this Shoreline Master Program Update could not itself be the needed Mill Creek Corridor Plan. Nevertheless, given the existing policy to pursue daylighting in the downtown, consultants working on the Update could have been directed to complete tasks such as identifying key parcels where daylighting might occur, as well as creek view corridors that it are important to create or preserve. Given that development is proceeding in the downtown, including a proposed new 100 foot building next to Mill Creek, there is a danger that the Shoreline regulations proposed in the Update that, as noted, simply ratify existing zoning, contradict the intent expressed in ENR 9 to replan the Flood Control Project in the downtown.

Thank you for the opportunity to submit my comments.

Sincerely,

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