

April 4, 2016

Bill Stalzer
Project Team Leader
Regional Shoreline Master Program
County Public Health and Legislative Building
314 West Main Street
2nd floor, Room 203
P.O. Box 1506
Walla Walla, WA 99362

Dear Mr. Stalzer,

I am representing Kooskooskie Commons, a Walla Walla non-profit organization, which has been conducting riparian restoration in Walla Walla and College Place for the past decade. With the Tri-State Steelheaders and Walla Walla County Conservation District as partners, we have conducted over 80 riparian restoration projects. Some of our largest and most public projects include Garrison Creek at Pi-Hi, Garrison Middle School, Walla Walla General Hospital and Ft. Walla Walla Park, and Yellowhawk Creek at Assumption Church, Murr Field, and WA-Hi. The remainders of the projects are located in back and front yards of private residences on along Garrison, Yellowhawk, Stone, Butcher, Lincoln and Bryant Creeks.

I am providing comments on the draft Regional Shoreline Master Program and associated maps and documents, specifically in regard to the adoption of the County Critical Areas riparian buffer width for Mill Creek within the SMP. The 35-foot buffer for Mill Creek is inadequate for purposes of ecological function for Mill Creek as defined by the EPA in their 2014 funding guidelines for riparian restoration; the EPA mandates a 100 ft riparian buffer on streams of this size and important to the recovery of ESA-listed fish species. Meeting these EPA criteria is essential to receive federal funding for riparian restoration, including from state or tribal agencies whose funding is federally source.

The final Walla Walla Shoreline Master Plan requires any development within 200 ft. of Mill Creek, 1) not impair ecological function and 2) incur no net loss of current ecological function of listed streams. An example of concern: the property being cleared for new construction of a motel at Myra Road, which abuts the flood control levy adjacent to Mill Creek, shows no apparent setback for a riparian buffer. Just downstream from that property are some important springs within a natural and mature riparian buffer that is wider than 35 ft. If that area were to be developed, would it be cleared to accommodate only a 35 ft buffer the ecological value would be impaired? Circumstances such as these must be definitively addressed in the final Shoreline Master Plan.

We recommend that the Walla Walla SMP adopt the EPA guidelines for riparian buffers instead of the outdated ones in the Walla Walla County Critical Areas Ordinance.

Adopting these criteria would be in accordance with the draft SMP **Section. 1.4 Relationships to Other Codes, Ordinances, and Plans**

<https://fortress.wa.gov/ecy/publications/documents/1510033.pdf> Appendix G-Riparian Restoration and Planting pg.74. Table G-1: Minimum Buffer Requirements for Surface Waters would replace SMP draft **Table 6.5-1: Recommended Minimum Riparian Buffer Widths for Waterways within the City of Walla Walla.**

The Mill Creek Flood Control Channel is already past its fifty years projected lifespan. There is much concern among related governments and agencies that it would be inadequate to prevent a catastrophic flood. It is also disappointing that, although a preliminary assessment is already underway for changes in the Mill Creek Flood Control Project, the SMP avoids any recommendations on this important topic. Replacing the current flood control channel with updated design and construction methods that produce a more ecological and people friendly flood control channel seems to be inevitable. We are concerned that the SMP as now written does not provide for these eventualities.

Kooskooskie Commons proposes that the draft SMP be amended to create a 100 ft Ecological Restoration Area along the entire Mill Creek Flood Control Channel from Rooks Park through the City of Walla Walla to Gose Street in College Place on currently undeveloped properties. Creating this area would provide for realistic future planning within the time frame of the SMP to provide necessary space for ecological restoration as well as for the development of paths and parks such as those envisioned by WSU Landscape Architecture Classes in 2014 and 2015.

<https://drive.google.com/open?id=0B1ULt4ZQJmzVeWZCT0JmSktXRWM>.

So doing would also provide the potential to acquire in advance or in accordance with a reconstruction of the Mill Creek Flood Control Channel, 100 feet of affected properties, which are not yet developed. A designated 100-foot wide Ecological Restoration Area would allow for private landowners to seek funding from federal sources to implement ecologically effective riparian areas and enhance their properties value.

Thank you for the consideration you give to this proposal.

Sincerely,

Judith S. Johnson

Judith S. Johnson
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