

From: [renee.hadley@wwccd.net](mailto:renee.hadley@wwccd.net)  
Sent: Tuesday, September 27, 2016 3:45 PM  
To: Sikes, Jeremy (ECY)  
Subject: Walla Walla Coalition Shoreline Master Program public comment

Mr. Sikes,

I previously reviewed the Cities of Prescott and Waitsburg SMP's and provided comments their management staff separately. Regarding the Walla Walla County and City of Walla Walla SMP's I have concerns. Regarding buffers, development and flood control, the SMP does not appear to be different from the existing municipal codes. The City of Walla Walla does not include Yellowhawk Creek as a SMP waterway but the County does. This uneven approach to regulation is adversarial as the City annexes more and more areas along Yellowhawk Creek. Previous areas under County jurisdiction that may be annexed then do not have to comply with SMP. The WW Co. SMP 4.10(D) defers to FEMA 100 yr flood mapping or the most current technical information available. Local FEMA flood maps are from the early 1980's with inaccurate topography (floodplain extent lines bisecting houses and not following terraces). Section 5.1(E.9) references "changes in grading or fill that reduce floodplain capacity" as an adverse impact to critical areas. Development within floodplain/floodway areas are bound by dated maps and mitigation efforts are currently insufficient to accommodate for fill/grading activities within floodplains. Buffer widths along major floodways such as Mill Creek, Yellowhawk Creek, Russell Creek and others are currently only sufficient for hold 20-40 year flood events but not an 80 year flood event such as 199 or a 100 year flood event. We recommend buffer widths be expanded to 1.5 the existing buffer width for all new development. We also recommend floodplain/floodway delineation be updated based on documented past flood events, updated FEMA maps, surveys, and/or LiDAR data. Thank you for providing this opportunity for public comment.

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