

Compilation of Follow-up Comments from 12/14/06 STAC Meeting

Requested due to time shortage during meeting

Introduction:

While the project team of staff and consultants appreciates the dialogue that occurred at the December 14th STAC meeting, the discussion did not necessarily proceed in the linear fashion outlined by the agenda. Therefore, in an effort to collect STAC member thoughts on anything missed during the meeting and to assist the project team to proceed, STAC members were invited to submit any further comments/questions to the Project Coordinator by Friday 12/22/06 on the following items:

- Project Strategy on STAC Sub-Group Recommendations
- I&C Map Folio Data Source Matrix
- Current code, draft amendments and CAO Committee Brief
- Any specific questions/clarifications on the Battelle methodology and scoring prioritization maps

STAC Input:

The following input on the documents identified above was received from STAC members.

Project Strategy on STAC Sub-Group Recommendations

Four STAC members submitted comments:

Peter Bahls:

Although the Jefferson County excerpt from the lakes report below is a bit cryptic, what it says is that in addition to the six lakes identified by both surveys, three lakes were surveyed in 1998 that also appear to be Shorelines (Browns, Thorndyke, and Chinese Gardens). (In fact, the Thorndyke lake is the one that DOE still uses in their slideshow as an example of how a lake with a small open water area can actually be larger than 20 acres). My "assumption" of six lakes in the last sentence is overly conservative for arguments sake -- the probable number of lakes that meet Shoreline criteria is still nine.

*[Page 21] In summary, results from Jefferson County suggest that the Phase I GIS methodology is possibly more accurate than predicted by Phase II and III subsampling. Six of 9 lakes identified as Possible Shorelines by the Phase I GIS method were also identified by the 1998 survey (Table 8). All four of the lakes classified by the GIS methodology as having an open water area between 10-19 acres were identified as Shorelines and one lake in the 1-9 acre category was identified. The Phase I survey errors were primarily with lakes with small open water areas. **The Phase I survey missed three lakes with small open water areas that are probably Shorelines** and included two lakes that are probably not Shorelines. These results indicate that the accuracy of the Phase I GIS to identify*

12/14/06 STAC Meeting Follow-up Comments

Shorelines may be higher than estimated by Phase II and III sampling results, especially for lakes of 10 acres and larger in open water area. More detailed mapping and field verification is needed to verify if these Jefferson County lakes do indeed meet Shoreline criteria. However, if we assume that the six lakes identified by both methods do qualify, this represents a 55 percent increase in designated lakes in Jefferson County beyond the eleven lakes currently designated.

Table 8. Comparison of 1998 survey and Phase I GIS results for Jefferson County. Yellow shows lakes identified by each method that may meet criteria for designation.

Lake Name	1998 Survey results	GIS Results by Lake Class
East Wahl	Shoreline	Open Water 1-9 Acres, Possible Shoreline
Beausite	Shoreline	Open Water 10-19 Acres, Possible Shoreline
Horseshoe	Shoreline	Open Water 10-19 Acres, Possible Shoreline
Ludlow	Shoreline	Open Water 10-19 Acres, Possible Shoreline
Teal	Shoreline	Open Water 10-19 Acres, Possible Shoreline
Rice	Shoreline	Open Water 20+ Acres, Possible Shoreline
Browns	Shoreline	Open Water 1-9 Acres, Not Shoreline
Chinese Gardens	Shoreline	Not found -no open water
Thorndyke	Shoreline	Not found - < 1 acre open water
Delaney	Not Shoreline	Open Water 1-9 Acres, Possible Shoreline
Embody	Not Shoreline	Open Water 1-9 Acres, Possible Shoreline

Further clarification was requested by Michelle regarding 1) Chinese Gardens' location in City of Port Townsend, 2) author(s) of the 1998 survey, and 3) identification of Ecology staff. Peter Bahls replied as follows:

Yes, if you don't count Chinese Gardens, that leaves Browns and Thorndyke, for a total of eight lakes that are probably shorelines with a need for field verification (in-the-field location of ordinary high water and GPS locations then plotted on aerial photo to confirm lake edge location). The 98 survey was done by me, based on measuring lake size from aerial photos and then field checking location of lake edge (ordinary high water mark determination) on several of the lakes as a TFW ID team with landowner representatives, DNR, and with ecology staff (Perry Lund, Jeffree Stewart, and Al Wald). Dan Baskins at Fred Hill Materials sent me a wetland survey for Wahl lake and East Wahl lake (aka Twin Lakes) that he says is on file with Jefferson County. Although this wetland survey was not designed to field verify lake size based on ordinary high water, lake size for both lakes is listed as greater than 20 acres and the results of the wetland survey appear to confirm that both Wahl lake and E. Wahl are greater than 20 acres.

Richard Brocksmith:

Hello, and thanks for the opportunity to comment. Time is short for everyone, so I'll focus my comments on the most important points.

12/14/06 STAC Meeting Follow-up Comments

- Project Strategy on STAC comments
 - C. It seems that we should work with Ecology to develop the capacity to inventory and characterize all known waterbodies that meet the criteria for shorelines of the state.
 - D. It also seems that although we may not be able to inventory and characterize every single attribute on Jefferson County shorelines, at a minimum we should thoroughly describe freshwater and marine processes and functions so that at least the foundational information is provided to SPAC and to the general public so that we provide the rationale for any actions needed to meet the “no net loss” requirements of this update. To that end, I would propose that the consultant send out their current draft of this document and allow the STAC additional time to provide more detailed written recommendations for inclusion before it is finalized.
 - F. I could use this additional review period to add detail on this major recommendation.
 - I. Similar to C., we should work with Ecology to understand how monitoring fits into the SMP process, especially in light of “no net loss” requirements.

John Cambalik:

Page 1 – Key:

I suggest that you consider sending around a final draft of the revised I&C report for final comment once all of these items have been addressed.

Page 2 – Last paragraph:

I look forward to that review! I recommend that a STAC meeting, open to the public, be organized very soon (*e.g.*, January) so that members will have an opportunity to provide input on development of the restoration plan. I’m available to help staff organize such a meeting. Please let me know how I can help.

Page 3 – Item B, bottom of page:

While I understand the funding limitations, it remains unfortunate that this I&C report can not be reproduced at the level that was done for Whatcom County, particularly knowing how regionally important the eastern Jefferson County marine shoreline is to the Puget Sound basin. For example, the marine shoreline of eastern Jefferson County is at a critical geographic juncture within the Puget Sound basin for salmon recovery, as it is part of three marine sub-basins (Eastern Strait of Juan de Fuca, Admiralty Inlet/Whidbey, and Hood Canal) described within the Puget Sound Salmon Recovery Plan submitted to NOAA Fisheries (see the Regional Nearshore and Marine Aspects of Salmon Recovery in Puget Sound chapter of that plan at <http://www.sharedsalmonstrategy.org/plan/index.htm>).

Page 4, Item C:

Great! This item seems of utmost importance to incorporate into the I&C report. Please keep the STAC informed on any progress here.

Page 4, Item D:

Great! I look forward to reviewing the expanded and improved language in the next version of the I&C report and the draft Restoration Plan.

12/14/06 STAC Meeting Follow-up Comments

Page 4, Item E:
Great!

Page 4, Item F:
In addition to the Summer Chum Recovery Plan, please be sure to also review and reference, where appropriate, the Salmon Recovery Plan submitted to NOAA Fisheries by Shared Strategy, particularly the regional nearshore chapter I mentioned in a comment above, within the next draft of the I&C report.

Page 5, Item G:
Great! It would be useful to have members of the STAC review and comment on the forest cover map using their extensive knowledge of the county riparian areas.

Page 5, Item G “wildlife”:
Please check with Jeff Davis with WDFW to see if there are any additional wildlife datasets that might be of use here.

Page 6, Item H:
Great! This should help to some degree.

Page 6, Item I:
Another critical missing piece that needs to be addressed. Please keep the STAC informed on the progress in this regard.

Page 6, Item J:
Again, I recommend that a STAC meeting, open to the public, be organized soon (*e.g.*, January) so that members will have an opportunity to provide input on development of the restoration plan. I'm available to help staff organize such a meeting. Please let me know how I can help. Perhaps such a meeting could also include discussion among STAC members, staff and their contractors on the soon to be proposed Environmental Designations and associated buffers and setbacks. I believe that the STAC could provide some valuable input in this regard for staff and the SPAC to consider when formulating these recommendations.

Steve Todd:

Dear Ms. McConnell: As a member of the STAC and employee of the Point No Point Treaty Council, I would like to comment on the “Project Strategy for Addressing STAC Sub-Group Recommendations” (hereafter called Project Strategy). These comments are also supported by Jamestown S’Klallam Tribe technical staff. The Project Strategy was distributed to the STAC by email on December 12, 2006, and discussed in part at a STAC meeting held on December 14.

I am pleased with the way Adolfson and county staff has responded to some of the STAC recommendations on the Draft I&C, for example item G in the Project Strategy, which addresses data and maps. However, there are several items where I have uncertainty as to how specifically Adolfson and the county will address STAC recommendations. In other words, I am in a “wait and see” mode. I want to emphasize this point because I think the STAC should be given the opportunity to review a Final Draft of the I&C, apparently due

12/14/06 STAC Meeting Follow-up Comments

in mid-January 2007. I have particular concerns with several items in the Project Strategy, namely C, D, I and J. Because the I&C is one of only a few reports (others being the Restoration Plan and Hydrological Alterations Report) that provide the technical foundation for updating the SMP, and the I&C is the primary document defining the baseline condition for us to measure “no net loss” of ecological function, it is critical that we adequately address key aspects of the I&C.

Two concerns, Shorelines of the State (item C) and Monitoring (item I), are matters that need to be resolved with Ecology, and I strongly support the county in continuing their communication with Ecology to address these issues. We need to incorporate the best available information (i.e., found in Kresh 1998 and Bahls et al. 2006) on the Shorelines of the State in this revision of the SMP. For example, at least two important stream systems in East Jefferson County, Salmon Creek and Chimacum Creek, would be significantly affected by including the information found in Kresh (1998). A monitoring program is essential for us to be able to measure whether and how well we are meeting the SMA requirement of “no net loss” of ecological function, in addition to providing direction as to how we might adapt the SMP over time to more effectively achieve no net loss.

Two other concerns, items D and J, are matters that are central to the success of the I&C and in the forming of an effective revised county SMP. In item D, the STAC recommended that the I&C provide an improved description of marine and freshwater processes. This would include (among others) riparian functions, channel migration zones, and geomorphic processes. Specifically, the county, its consultants, and the SPAC, need the technical guidelines (i.e., the science) to help them make appropriate decisions on shoreline environmental designations (SEDs), allowed, conditional, and prohibited uses, and vegetated buffers and setbacks along marine and freshwater shorelines. I am not yet convinced that the “Final” I&C will provide the needed descriptions of these processes. Thus, I again express the need for another STAC review of the I&C Report before it becomes final.

In addressing item J in the STAC recommendations and Project Strategy, I appreciate the willingness of the county and consultants to keep the STAC involved in the process of updating the SMP. However, I think the STAC should have the opportunity to be more engaged and needs adequate time to deliberate and review the important components that go into revising the SMP. With that, I would request that the STAC meet with county staff and (if possible) consultants sometime in January to discuss finalizing the I&C, specifics of the restoration prioritization model and results developed by Battelle (e.g., we still do not understand important assumptions and inputs of this model), and how the Battelle work becomes incorporated into the Restoration Plan, as well as Shoreline Environmental Designations (SEDs). As a STAC member, I am willing to work with county staff and consultants in helping to gather the necessary information for an improved I&C Report and other reports that will put us in a better position to move ahead with the SMP revision process, giving us an effective Shoreline Master Program.

Thank you for the chance to comment. I look forward to more engagement with the county, consultants, and other STAC/SPAC members in the coming year.

I&C Map Folio Data Source Matrix

Two STAC members submitted comments:

Richard Brocksmith:

I have no specific comments to add to the Map Folio, other than commenting on how helpful this matrix is to understanding the maps!

Jill Silver:

Hi all – ~~Attached~~ [Below] are my recommendations for inclusion to the Map Folio, ~~incorporated as comments in the Adobe file~~ [Adobe comments were transcribed to Word.doc text with page/map references to include here]. I'm also attaching a summary focus sheet from DOE regarding expectation of inclusion of the Shorelines updates in the SMP update process. I'll send a set of shellfish maps provided by Jamestown S'Klallam in a separate email. Thanks, and happy holidays!

Page 1 - Map 1

Shorelines of the State

- See these websites for information re: inclusion of updated jurisdictional points:
<http://www.ecy.wa.gov/biblio/0506021.html>
<http://www.ecy.wa.gov/pubs/0506021.pdf>
http://www.ecy.wa.gov/laws-rules/activity/wac173_18_22_27.html

Page 1 - Maps 2 & 3

Wetlands & Potential Wetlands

- DNR's FPRAT - (Forest Practices Review Assessment Tool) has a good layering of soils, NWI, and other information. Contact Mac McCay at DNR in Olympia to see if it's available to JeffCo: Donald T. "Mac" McKay, Jr.; Hydrography and Transportation Data Steward; 360-902-1453; mac.mckay@wadnr.gov

Page 2 – Maps 2 & 3

CMZs

- YES, GIS is available for all reports on the west end. The reports have contact info, as do my comments. Good luck, and thanks.

Page 3 – Maps 6 & 7

LSI Landslides

- Please add the completed LHZ areas available for east and west Jefferson County at: <http://www.dnr.wa.gov/forestpractices/lhzproject/completed/> Included are: Humptulips, Middle Hoh, Kalaloch Ridge, Queets, Quinault. There may be additional for east JeffCo. Also, mass wasting and landslide maps are available for DNR as mentioned elsewhere.

Page 3 – Maps 8, 9 & 10

Aquatic Resources

12/14/06 STAC Meeting Follow-up Comments

- As above, need to incorporate updated shorelines jurisdictional boundaries. Where points move upstream into federal lands, I recommend that the point be snapped at the boundary, to at least include any thing that lay between the federal land and some other point downstream.

Page 4 – Maps 11, 12 & 13

Coastal Processes & Modifications

- Seems like JeffCo Public Works should have information for the Hoh River along the Upper Hoh Road and Oil City Road at a minimum, as these are county roads, along a Shoreline of Statewide Significance. Perkins Geosciences and Herrera and BOR reports for the Hoh River map in GIS the revetments and bank hardening.

Page 5 – Maps 14, 15 & 16

Environmentally Sensitive Areas

- Recommend using the Middle Hoh and Kalaloch Ridge LHZ as well as the landslide and mass wasting module maps and reports generated by DNR and stakeholders in draft form for the Middle Hoh WSA and the OESF Landscape Plan. Contact: Sue Trettevik - DNR, Olympic Region - 360-374-6131, susan.trettevik@wadnr.gov

Page 5 – Maps 17, 18 & 19

Marine Resource Species

- Nearshore tribal report produced by Shaeffer and Wray was provided. Please refer to it for west side shellfish and forage fish documentation. Thanks!

Page 6 – Map 20

Eelgrass

- Please do the same for west Jefferson County. The park strip is very narrow, and freshwater shorelines contribute impacts to nearshore resources.

Page 6 – Map 20

Kelp

- As above

Page 6 – Map 20

Priority Habitat Areas

- As above

Page 6 – Map 24

Commercial Shellfish Growing Areas; Biotoxin

- Need to incorporate Kalaloch Beach in West Jeffco for razor clamming - both recreational, subsistence, and tribal commercial.

Page 7 – Map 26

Marine Shoreline Geomorphic Class

- Geomorphic classes have been developed on the west side for freshwater shorelines in the channel module of the Middle Hoh WSA, Kalaloch Ridge, and Lower Hoh modules. Again, available in GIS from DNR. Call Jill if you can't get it.

12/14/06 STAC Meeting Follow-up Comments

[See also - Ecology Publication #05-06-021 “Focus on: Updating Shorelines of the State through local plans” (September 2005)]

[See also - Three maps produced by Jamestown S’Klallam Tribe using WA DOH, Jefferson County, and tribal data: 1) East Jefferson County Commercial, Recreational and Tribal Beaches AND Growing Areas; 2) East Jefferson County Commercial & Recreational Beaches; 3) West Jefferson County Commercial & Recreational Beaches.]

Current code, draft amendments and CAO Committee Brief

No comments were submitted.

Battelle methodology and scoring prioritization maps

One STAC member submitted comments:

Richard Brocksmith:

More time will be needed to review the details of their analysis, with additional time within the STAC to understand the potential uses for this assessment product. I suggest sending out the data matrices to STAC members so we can understand the framework and implications of weighting, parameter inclusion, and lack of geomorphic context.

Additional comments

One STAC member submitted comments:

Richard Brocksmith:

Additional Comments on SMP update process

- From my limited discussions with other STAC members, it seems that this process would be a bit smoother if we were allowed to work with the consultant team developing the SED criteria, allowed uses, etc., as well as the restoration plan before they are final drafted and sent to the SPAC. Simply put, providing input beforehand and with sufficient time to review and provide meaningful comments would be the logical order to proceed in the future.
- To these ends, I’d propose a STAC meeting in mid to late January (which should leave enough time to have public notice of the meeting), at which we should discuss;
 - Final Draft I and C Report
 - Best available science around SEDs
 - Approach for a restoration plan