

Appendix E

Technical Review Group Comments



STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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March 10, 2010

City of Spokane Valley
Attn: Scott Kuhta
11707 East Sprague Avenue, Suite 106
Spokane Valley, Washington 99206

SUBJECT: Comments regarding the Technical Review Draft of Shoreline Inventory and Characterization Report

Dear Mr. Kuhta:

The State of Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review and comment on the draft version of the City of Spokane Valley's Shoreline Inventory and Characterization Report February 2010. The inventory and characterization is very thorough; we have only a few comments on the Report that highlight minor inconsistencies and ecosystem characterization gaps.

Chapter 3, Regional Characterization: The shoreline analysis in this chapter is a comprehensive inventory of ecosystem-wide processes and ecological functions in habitats within shoreline jurisdiction in the City of Spokane Valley. However, the inventory of species and habitats in Section 3.2 **Spokane River Biological Resources** does not include all state listed species related to or affected by shoreline planning. In Spokane County, amphibians, such as western toad, also depend on freshwater shoreline habitat in the county. The following link will take you to WDFW's Priority Habitat and Species website <http://wdfw.wa.gov/hab/phslist.htm>. **County Specific Lists of Species and Habitats** are also available at this site under Related Links on the left hand side of the page.

The characterization does not include species that are Sensitive or Candidates for listing and therefore vulnerable of becoming Endangered or Threatened without removal of threats. We have enclosed a list of priority species found in the WDFW priority habitats and species database for Spokane County (<http://wdfw.wa.gov/hab/phspage.htm>). We recommend including these species in your characterization report to inform policies and regulations that will adequately protect the existing habitat functions upon which these species depend.

Additional Comments on the Species List:

Osprey, while included as a species of Local Importance in Spokane County, is no longer included as a priority species and is not included on the State Monitor list.

Section 3.2: References to Rainbow trout as well as Redband trout. WDFW has conducted genetics work under the Joint Stock Assessment Program and the redband trout have been found to be genetically distinct, wild fish. It is redundant to have both redband and rainbow trout listed. Columbia River redband trout (*Onchorynchus mykiss gairdneri*) are a subspecies of rainbow trout (*O. mykiss*) (Behnke 1992). A genetic inventory of rainbow indicates we have a virtually pure population of Columbia River redband trout in the Spokane River (Small et al 2007). For more information and to further improve the accuracy of the Characterization Report, please refer to the specific comments provided by Jason McLellan, WDFW Fisheries Biologist, forwarded through Doug Pineo, Ecology.

Section 3.5 Regional Processes, Stressors and Opportunites for Improvement:

Erosion (Spokane River): The Spokane River, particularly the upper reaches is not a wood controlled system nor in the past is it believed to have been wood controlled. The upper reaches of the river look much the same today as the reaches look historically indicating a system that is somewhat stable overtime. WDFW looks at the movement of bedload and channel changes that may occur with high flow conditions as a positive change. The embedded conditions that exist in the Spokane are not indicative of a natural river condition. It takes extreme high flow events (1996/1997) to move the bedload. The HEDs on the river do alter the natural flow regimes, restrict flows, and limit gravel recruitment downstream. The limited sources of gravel feeder bluffs and the operation of HEDs has resulted in a *gravel* starved system. This lack of gravel recruitment is believed to be one of the limiting factors effecting trout production in this reach.

Flooding: WDFW does not look at flooding as negative, but rather as a natural river process. Streams and rivers are supposed to be allowed floodplain connectivity and natural channel migration. It is the process of shoreline development and a controlled system that has resulted in flood control and resulted in altered natural shoreline and riverine processes.

Solarization: The main temperature issue in the upper Spokane is due to the operation of the HED upstream in Post Falls. Temperature is considered to be a factor in reduced survival of juvenile salmonids. The warmer water also supports the non-native smallmouth bass.

Fish and Wildlife: *Fish:* While the upper river habitat structure could be ranked as fair to good, the water quality parameters, particularly instream flow and temperature, force the ranking under Condition to be Poor. WDFW is quite concerned with the population decline of native redband trout in the Spokane River and as described above, this is likely linked with reduced spawning material, increased temperature, low recruitment success, and predation. *Wildlife:* Provide a source for the rankings. While some areas might have suitable habitat, development limits the functional use of the river by some wildlife species. The railroad, highway, residential, and commercial development have all limited the habitat available for species.

WDFW suggests adding Residential Development as a process so that docks, danger tree removal, private boat ramps, shoreline armoring, trails, riparian impacts, loss up upland habitat

and connectivity are all examples that can be included. Homeless encampments are also an issue along the river within the City.

Poaching is another Stressor on the native trout resources. WDFW has recently increased enforcement patrols to try to get control of the increased illegal fishing taking place on the already stressed population. Activity includes angling out of season, not practicing catch and release, and illegal use of bait in baitless/barbless area.

5.0 Local Characterization:

Fish: Include Redside shiner and sculpin spp. in the list of fish species found in the Spokane River system. Bull trout, Chinook salmon, and northern pike could also be added to the list of species that are occasionally noted– though all are entrained from the Couer d’Alene system.

Critical Areas: Fish and Wildlife Habitat Conservation Areas extend above the OHWL. For example, the WDFW recommended riparian habitat width is 250 ft. This extends well above the OHWL. Stating “below the OHWL” may cause confusion.

Shoreline Modifications: The City has an opportunity to address cumulative shoreline impacts under this update process. Addressing cumulative shoreline impacts is a requirement under the Ecology’s SMA and relying on WDFW to address these impacts under the hydraulic code is problematic at best. WDFW does not have the authority to address cumulative impacts from individual applications and can only deny projects on the basis of impacts to fish life. WDFW encourages the City to take this opportunity seriously and set an appropriate standard for future shoreline developments.

Sources: WDFW would like suggest that the following sources be considered for best available science:

A. Management Recommendations: WDFW produces management recommendations supported by best available science. Management recommendations are most appropriate to inform protection standards, but may also inform shoreline analysis recommendations. Sources include:

1. The updated PHS list includes electronic links to PHS management recommendations and single-page recommendations, recovery plans, living with wildlife program, and NatureServe Species Reports for all priority species. (<http://wdfw.wa.gov/hab/phsrecs.htm>). Management recommendations most commonly applied to SMP updates are:
 - a. Washington’s Priority Habitats: Riparian (1997), <http://wdfw.wa.gov/hab/ripsum.htm>
2. Trout Recovery: A sampling of agency recommendations include:

- a. Aquatic Habitat Guidelines, <http://wdfw.wa.gov/hab/ahg/>, covering a number of topics related to shoreline protection and restoration.
- b. WDFW Wild Salmonid Policy (1997):
<http://wdfw.wa.gov/fish/wsp/wsp.htm>
- c. WDFW, Ecology, and DOT. Alternative Mitigation Policy Guidance:
<http://wdfw.wa.gov/hab/ahg/altmtgtn.pdf>
- d. Land Use Planning for Salmon, Steelhead and Trout (Knight 2009);
<http://wdfw.wa.gov/habitat/plannersguide/index.html>

Again we thank you for providing an opportunity to comment on the Report and are impressed with the thorough inventory and characterization. With the inclusion of all WDFW priority habitats and species, we believe this report provides a good foundation for your Shoreline Master Program policies and regulations. We look forward to providing additional technical assistance throughout your update process. Please feel free to contact me with any questions or requests for additional information.

I look forward to continuing to work with the City of Spokane Valley on this Shoreline Master Program Update.

Sincerely,



Karin A. Divens

Kad: KAD

Cc: Mark Wachtel, RHPM
Jennifer Davis, Environmental Services Coordinator
Doug Pineo, Department of Ecology

From: Person, Randy (PARKS) [mailto:Randy.Person@PARKS.WA.GOV]

Sent: Thursday, March 11, 2010 3:17 PM

To: Lori Barlow

Cc: Parsons, Christine (PARKS); Person, Randy (PARKS); Schulz, Mark (PARKS); Guidotti, Chris (PARKS); Fraser, Bill (PARKS); Scott, Kathryn (PARKS); Harris, Jim (PARKS); Koss, Bill (PARKS)

Subject: Response to Spokane Valley SMP inventory report

Thank you for making the Draft Shoreline Inventory and Characterization Report available for comment. It contains a great deal of information, and should make a good basis for future discussions. The Washington State Parks and Recreation Commission has a few comments for you to consider.

Spokane River Centennial Trail – the document routinely refers to the trail developed by the Washington State Parks and Recreation Commission, and maintained through an interagency agreement, as simply “Centennial Trail.” We recommend that the more complete reference “Spokane River Centennial Trail (SRCT)” be used. Although it’s not a bad reference in context, there were several other “Centennial Trails” constructed in Washington at about that time, and using the full reference will make it easier in the future, especially for digital search engines.

The SRCT is mentioned often as an important feature. At times it is a landmark, at other times its presence as a barrier is noted. Unfortunately, only the map in figure 5-4 on page 42 actually shows the alignment of the trail within the shoreline zone. Wherever possible, please show the actual trail alignment. We can help with this – GIS data is available for the asking, that shows State Park ownership, as well as the trail alignment. Please contact Kathryn Scott at Kathryn.Scott@parks.wa.gov, or (360) 902-8691 to work out the details.

In a similar vein, the text is full of landmarks and other geographic references, which some of us are unfamiliar with. Categorically, maps showing the locations of all the referenced items should be included. It is difficult to fully understand the written information without some idea of the physical relationships being discussed.

The second paragraph on page 69 discusses potential for non-motorized watercraft access near Coyote Rock, “just west of Mirabeau Point.” Is this correct? Our reading of the maps shows the Coyote Rocks area lying just westerly of Myrtle Point, with Mirabeau further upstream.

Speaking of development, please consider the ongoing need for public access to the shoreline during discussions of shoreline designations, appropriate uses, and development regulations. This report describes a number of areas with social trails leading to the water edge. The demand to reach this special area is high, and the need to protect the shoreline is also high. We recognize that often the best solution is appropriate development of designated facilities such as paths, viewing platforms, and hand carried watercraft launch and retrieval facilities. Providing carefully designed convenient access facilities directs use, and helps protect adjacent fragile natural areas.

To be able to provide useful public access facilities and thereby limit impacts, it is important that public access facilities be shown as “permitted uses” in publically owned shoreline areas, and especially those lands that contain the SRCT. Appropriate development regulations will then

help assure that facilities are well designed and strike a good balance between public access and preserving most of the shoreline's existing natural character.

Please add the address local.government@parks.wa.gov to your mailing list. This site is monitored regularly. Sending there will assure a timely response that is not dependent on one individual.

Thank you. We look forward to continuing to work with the City of Spokane Valley as you work towards a new revised Shoreline Master Program.

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Hi, Scott. We're always happy to review when someone actually pays attention to our comments. Your newly available suite of maps is very helpful. The Shorelines by Section map certainly shows the SRCT very accurately. Those same maps could be made more useful with just a little more label work. Some examples:

- E-5i shows the Sullivan Road area, with several parking areas near the river. I might presume the one west of Sullivan, closest to the river on the north bank, is public recreational parking, and the others are business related. A short label in these relatively clear areas would clarify things. If the parking on the north side is intended for access to the SRCT, by walking across the bridge, that could even be stated.
- E-5o could easily label Myrtle Point.
- E-5j shows an unidentified railroad bridge

In general, take the attitude of an ignorant (though intelligent) person viewing the area for the first time through your maps. Don't crowd them with so many notes that you can no longer see the features, but the scale used allows a lot of room for helpful labels.

And speaking of scales . . . Even here at the office, my print default came up at 8 ½ x 11. If I was an interested citizen viewing these from home, I may well have a printer that could not produce 11 x 17. Especially today, when digital output is so controllable by the end user, it is important to have a scale that works. The text 1" = 200' does not. It should be replaced (or augmented) with a graphic scale, which was well done on E-4. No matter what size the output, one can then accurately determine distances.

I'm still not sure that I could pick out each area in the Audubon report, but I have a much better idea of the site conditions with the draft inventory maps. Although a day in the field exploring the river would be great, I'm probably destined to help coordinate our responses from Olympia, so the printable product is very important for me.

Cheers,
Randy Person

Memo

To: Scott Kuhta
From: Walt Edelen
CC: Shoreline Inventory Comments
Date: 4/6/2010
Re: Characterization Report

Comments:

1. Page 5. It should state Spokane County Conservation District, not Service
2. Page 11. 3rd paragraph. It should read, According to Spokane County Conservation District's,
3. Page 11. 3rd paragraph states that the PFC rates the Spokane River as poor to fair ecologically. This is inaccurate. The PFC states that the Spokane River, ecologically, is fair to good. The PFC reported 24% as Good, 55% Fair, and only 21% as poor.
4. Scientific names of plants should be italicized on page 13.
5. Your water quality section is rather sparse. I would have expected a lengthy section with all the TMDL efforts and data collected over the years.
6. Page 14. NPS. Your first sentence needs restructuring. It reads as though you are promoting decreased use of urban runoff and fertilizers.
7. Shelley Lake. Might want to add something about the large waterline fluctuation of Shelley Lake due to the spring runoff. There is a significant drop by summer without the pumping.
8. Would one of your issues (page 17) be instream flows? What about impacts of Post Falls dam?
9. Page 21. 2nd paragraph. Ends with relatively recently. Change that to recently.
10. Page 21. Shelley Lake section. No mention of slaughterhouse history & use. Dumping of carcasses in Lake? Probably not needed.
11. Page 24. It may be important to enhance the riparian corridor, but there are areas that need to be protected from development encroachment. High quality areas that need restrictions likely greater than the SMA or local ordinances.
12. It would be helpful to have the River Miles stated for the Study Segments in the documents. I could line up other things with that information.
13. Page 31. I think this area is a Rosgen channel type C2 or C3. Not sure it matches up with PFC work.

14. Table 5.5. I realize the one plant association comes out to 0%, but it just doesn't look good to the general reader.
15. I do like the fact that you researched the amount of impervious surfaces within the riparian zone. Great data.
16. I was a little confused as to how you have 144.6 acres of plant associations within your 88.5 acres of Segment 1. Is this due to that the 88.5 is just the amount under jurisdiction?
17. Page 41. The statement regarding the SCCD report and adequate riparian vegetation of greater than 60 ft. I think this interpretation is not entirely accurate. The SCCD report indicates that this area had a riparian width similar to the previous reach (in the report – reach 4). It actually states an average riparian width of 0-50 ft and that it the reach was dominated by discontinuous narrow bands of vegetation. Overall, the reach is fair to good on habitat.
18. I do like the paragraph on page 41 where it states that more trees need to be added for restoration efforts.
19. Page 43. Coyote Development. Who has determined that a 75' buffer is adequate? What types of access are they trying to get with permits?
20. SR-4 – areas behind upriver dam are subject to wake action due to boating activities. Local residents complain of this regularly. Lots without adequate vegetation are suffering streambank erosion issues.
21. The trail around Shelley Lake has mooring areas for non-motorized boats? I didn't see any last year.
22. The east side of Shelley Lake has a nice High quality area including the granite rock, Ponderosa Pine community and some alder communities.
23. General comment: There should be better spacing between some of the text and the figures in the document. It may be a formatting issue.
24. Page 65. Last paragraph. Misspelled word (t). the word "it" is missing the "i"
25. I do not think dock permitting should occur within the Spokane River at the Coyote Development site. This is not protection of the shoreline and preserving its natural character. Don't allow this activity to degrade a great City asset.
26. Your Recommendations section does not include any restoration plans for the shorelines. Why not? You could work with local agencies, especially the SCCD to accomplish this.
27. Overall, I think you have a done a good job on the inventory section. Please contact me if you have any questions regarding my comments

Regards,

Walt Edelen

Water Resources Program Manager

Spokane County Conservation District



Comment Response Form

Document Reviewed:	City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)						
Subject:	Shoreline Planning	Commenter:	Doug Pinneo and Jeremy Sikes, Ecology	Comment Date:	3-12-2010	Response Date:	4-5-2010

No.	Ref.	Comment	Response	Provided by
1.	Section 1.0, 4 th pgh	[DAP1] I think this is supposed to be a heading	Remnant sentence, removed	JCP
2.	Sec. 1.1 Purpose of the Characterization	<p>[DAP2]: When referring to functions it's probably good to specify ecological functions. Also these three bullets mix up the following sequence a little bit:</p> <p>1) Conduct a shoreline inventory;</p> <p>2) Analyze inventory data and information to:</p> <ul style="list-style-type: none"> - characterize ecological functions including biodiversity, native plant and animal community integrity, etc., so as to achieve a "meaningful understanding of shoreline ecological functions; - identify elements of natural character, shoreline habitats and ecosystems and related attributes which should not be disturbed, damaged or destroyed because they can't be restored or replicated within the time horizon of the SMP (10-12 years); - identify opportunities for restoration of shoreline resources and ecological function; - characterize reasonably foreseeable uses and developments in the shorelines as the basis for assessing potential cumulative impacts. 	Revised paragraph to address comment.	JCP
3.	Sec. 1.2 SMA Jurisdiction	<p>[DAP3]: SMP jurisdiction MUST be extended to include the delineated boundary of all associated wetlands. Local governments MAY choose to extend SMP jurisdiction to include the buffers necessary to protect wetlands as they are critical areas as defined in the Growth Management Act.</p> <p>All critical areas (as defined in the GMA) within SMP jurisdiction shall be managed with the comprehensively updated SMP after it is approved by the Department of Ecology and becomes part of the statewide Shoreline Master Program. This was clarified earlier this week by the legislature in its most recent amendments to the SMA and GMA. This legislation has been informally labeled the "Anacortes Fix" during the 2010 legislative session.</p>	Revised per comment and added a reference to the latest SMP amendment .	JCP

No.	Ref.	Comment	Response	Provided by
4.	Sec. 2.0 Methods, last bullet (Tribe)	[DAP4]: The technical advisory committee might also benefit from participation by experts in riparian ecology and stream ecology at Eastern Washington University and from other local experts not affiliated with government.	Many groups have been contacted (Audubon, IEFCC, SFF, TU, Native Plant Society) and involved with data gathering. Some have been more responsive than others. The inventory is available on the website and public notice has been published.	JCP
5.	2.1-Field Inventory, last paragraph	[jjs5]: Was there some kind of gap analysis document that was prepared for the City? If so, this section should at least refer to it and include it as a reference. If not, this 3 sentence paragraph describing gaps does not really tell the tale. Either way this section requires some expansion.	Revised slightly. App. A includes a listing of data sources and an evaluation of missing information that was needed for the inventory.	JCP
6.	2.2.1 Veg. Survey Protocol	Comment [DAP6]: The SMA requires “protecting against adverse impacts to the land, its vegetation and wildlife, and the waters of the state and their aquatic life. Thus, riparian and associated upland vegetation and native plant communities are thus given equal protection under the SMA. It’s fine to call out the special importance and ecological functions riparian areas have in the landscape, but this discussion should be revised to better emphasize the relevance of upland plant communities in SMA jurisdiction. This need is better born out in the actual descriptions of reaches in Section 5.	Agreed. Reaches are given detailed assessment of all veg. communities for this reason. Also, Sec. 3.2, under the Biological Resources heading, addresses not only the importance of riparian habitat but of the importance of the ecotone between the riparian habitat and the adjacent upland communities. Some redundancy is inherent in the outline of the document so the vegetation is described in general regional terms (Sec. 3), historic terms (Sec. 4), and study segment-specific terms (Sec. 5).	NH
7.		Comment [DAP7]: Since Rex Crawford’s work encompassed only the Columbia Basin and not the surrounding highlands, like the northern tier of eastern Washington, the Spokane area, the Palouse and the riparian and floodplain plant associations of the Blue Mountain counties (Asotin, Garfield, Columbia, and Walla Walla), why did you not develop or assign your own plant associations or use those identified by others including Kovalchik?	Rex Crawford’s associations best matched the observed plant associations along the river (surprisingly!). So as to minimize reinventing the wheel, the most applicable vegetation management guide was used, which happened to be RC’s. It should be mentioned that Kovalchik et. al. and the SCCD’s PFC study were also referenced for various wildlife habitat values as presented in Table 5-1.	NH

No.	Ref.	Comment	Response	Provided by
8.	3.1- SVRP Aquifer	<p>[DAP8]: From our Spokane River and Aquifer expert John Covert: On page ten they have a graphic that shows gaining and losing reaches along the river. The most up-to-date version of this map can be found in the 2009 Update addition of the SVRP Aquifer Atlas. I am attaching a screen capture of a portion of page 14 of the atlas that shows the most current understanding of the relationships. It is slightly different than the one in the draft SMP inventory. The aquifer boundary was updated in 2007 (Bi state study) which isn't used on the image on page 10. In the third paragraph from the bottom of page 20 they say "Sometime between 1910 and 1925 the Spokane Valley Irrigation District constructed a canal to divert water from the river for irrigation near the state line." This is true.</p> <p>Near the top of page 21 is this paragraph: A review of the historic documentation indicates that the Spokane River did not play a large role in the development of the Spokane Valley. Early land development is generally associated with irrigation from the surrounding lakes and later with pumping from the Spokane-Rathdrum Aquifer. The river was not heavily used until relatively recently. The Spokane Valley Farms Canal at Post Falls (USGS gage 12418500) diverted hundreds of cfs from the Spokane River and irrigated thousands of acres from the 1920s into the 1960s. That surface water was replaced with groundwater wells in the late 1960s (USBR project drilled 34 wells in the aquifer to replace the surface water diversion). Very little surface water is actually used any more. Almost all water users withdraw from wells now. So the paragraph on page 21 needs to be fixed. JC</p>	<p>Revised section to address comments. COSV is acquiring the latest aquifer GIS information. Mapping will be revised I this or the final draft depending on when the information can be acquired.</p> <p>The intent of this paragraph was to indicate that development of the valley did not impact the river to a great extent. Irrigation from the river, lakes, and aquifer certainly played a major role in development but the immediate river valley was not a significant factor in shaping the valley as evidenced by no roads or utility corridors along the river as occurs in many other areas. Section revised.</p>	JCP
9.	3.1- SVRP Aquifer, 4 th paragraph	<p>[DAP9]: These two sentences contradict each other.</p>	Revised	JCP
10.	3.2- Spokane River (last paragraph)	<p>[DAP10]: The Proper Functioning Condition assessment conducted by the Spokane County Conservation District did in fact include some limited annotation about ecological function, but significantly understates the ecological functions made evident elsewhere in this Inventory. Also, the river banks in much of the river reaches flowing through Spokane Valley are self armored and frequently characterized by large boulders and cobbles distributed by much larger flow regimes than occur today. This section needs to be rewritten.</p>	<p>Section 3 presents a general, regional overview of SMP waters within the City. More detailed assessments of geomorphic conditions and ecological functions are presented in Section 5; at the local assessment scale.</p>	NH

No.	Ref.	Comment	Response	Provided by
11.	3.2- Bio Resources	<p>[DAP11]: This discussion does not tell us anything about, or introduce future discussion of the spatial and temporal occurrences and distribution of these groups in the shorelines of the Spokane River. The SMP guidelines tell us how to use local expertise but use of anecdotal observations of wildlife abundance must be carefully placed in context. Even the PFC assessment is a one-day “fly by” of only very limited value in the inventory discussion.</p> <p>This introductory discussion also makes no mention of aquatic or terrestrial macro-invertebrates, though they are briefly mentioned later.</p>	<p>Again, this is meant to provide a regional description to showcase the matrix within the COSV shorelines fit into.</p>	NH
12.	3.2-Bio Resources, trout bullets	<p>[DAP12]: Redundant. Red band are the native rainbow trout which include both resident non-migratory populations and also the region’s anadromous steelhead trout which do not reach into Spokane Valley. Also, many other priority species have been observed in Spokane Valley over the years, and while a discussion of the Priority Species has a limited place in the SMP update Inventory, the SMA and SMP Guidelines require equal protective management for all species in shoreline environments. This is one of the areas in which the SMA and the GMA standards for Critical Areas differs significantly. The SMA standard for protecting wildlife and their aquatic and terrestrial habitats is higher in the SMA than in the GMA.</p>	<p>Per WDFW comments, a new table (Table 3-2) was added to the report to include all priority species within the county. Section 5 then links the life forms to available habitats and describes their use potential in Table 5-1. This is meant to provide a surrogate for the shoreline’s potential to support these species and, thereby, highlight areas for conservation or restoration.</p>	JCP/NH
13.	3.2-Bio Resources, 4 th paragraph	<p>[DAP13]: Thurow is in error with respect to the status of red-band trout in the Spokane and its tributaries. See Jason McLellan’s more thorough comments circulated separately.</p>	<p>Revised to incorporate the findings of Small’s 2007 genetics study.</p>	JCP/NH
14.	3.2 plants	<p>[DAP14]: This a vague, general and deficient discussion which doesn’t add anything to our “meaningful understanding” of native plants along the Spokane River in Spokane Valley.</p>	<p>I assume you are describing the “Vegetation” section. Again, this is meant to provide a general/regional overview of vegetation patterns along the river. By describing the general bands of vegetation and corresponding geomorphic positions, lay readers are more readily able to visualize the shoreline environment and understand the differences within a varying habitat collectively referred to as “riparian”. Further detail provided in Section 5.</p>	NH
15.	3.3-Shelley Lake	<p>[jjs15]: Has this “work” been referenced already elsewhere?</p>	<p>No. Reference expanded.</p>	JCP
16.	3.4-Gravel Pits	<p>[jjs16]: Reference a figure here</p>	<p>Added a reference to Figure 1-1</p>	JCP
17.	4.1-historic veg.	<p>Conspicuous? Meaning they “stand out” less?</p>	<p>Yes. I have changed conspicuous to “common” for clarity.</p>	NH
18.	4.1 shoreline alterations	<p>[jjs18]: They have a water right for discharge? Should this refer to an effluent discharge permit?</p>	<p>Revised – added reference to NPDES permit for discharge.</p>	JCP

No.	Ref.	Comment	Response	Provided by
19.	4.1	[jjs19]: The riparian impacts from the initial trail construction bear a little more description here. What type of vegetation? was it intact riparian? How much? To what effect?	Revised after discussions with Ecology. Please review and comment.	JCP
20.	4.1	[DAP20]: In a number of locations in Spokane Valley, where no previous roadbed existed, the trail was constructed through remnant intact patches of native Rathdrum Prairie and through riparian vegetation, for example west of Barker Road, over 30 acres of native plant associations were permanently lost. The trail also introduced noxious weeds to areas previously not invaded. Trail maintenance has included routine use of herbicides to control the weeds, also affecting adjacent remaining native vegetation.	Revised, see response in No. 19.	JCP
21.	4.2	[jjs21]: this implies that there was once much more water in the lake. Is that true? Miniature hydroplane races sound awesome.	Hard to say, since past information is hard to come by, but we know that supplemental water was pumped into the lake from the aquifer until recently.	JCP
22.	4.3-gravel pits	[jjs22]: SI there any more information on how this conversion will take place? Will they actively restore the area to maximize habitat or just quit mining and let nature take it's course?	There are approved DNR reclamation plans for each of the pits.	JCP
23.	5.1-rare plants	Comment [DAP23]: More significant in many ways than rare plants are the relative abundance and association of plant species which are not yet listed.	“Rare” as used in the report includes listed (T & E), “Sensitive”, and “Tracking” status plants. No records of any rare plants or rare plant associations were documented within the SMP areas. Overlapping rare plant associations were noted at the old Inland Empire Zoo (Mirabeau Park) but not within the SMP during fieldwork.	NH
24.	5.1-fish	[DAP24]: This is not true. The river channel is characterized by a diverse channel morphology and fish species exploit different habitats within the wetted perimeter. Temperature and dissolved oxygen also strongly affect the distribution of different species in the river. Small mouth bass are as yet not widespread in the lower river below Monroe Street Dam in Spokane, as they are in the upper river in Spokane Valley. Contact WDFW for more recent surveys of fish in the upper Spokane River.	This section was updated to address cold water refugia per McLellen & O’Connor (WDFW) 2008 and 2009. Further detail on spawning areas and local abundances provided I the study segment subsections.	NH
25.	5.1-Critical areas	[DAP25]: Need to add geohazards	According to the City GIS information no geohazards have been identified along the Spokane River.	JCP
26.	5.1-sediment transport	[jjs26]: refer to figure; this is a little confusing. be more specific; what natural areas? where are the corridors? how important are they regionally	Revised, added additional detail.	JCP

No.	Ref.	Comment	Response	Provided by
27.	5.1.1.1-recreation	[jjs27]: I understand what you are getting at here, but I'm not sure about the use of the word "buffer", Implies that it is providing more ecological benefit than the trail actually does. The presence of the trail in the buffer actually degrades it's function over even a pervious dirt road and certainly over a vegetated riparian corridor. Maybe "physical separation"?	Revised,	JCP
28.	5.1.1.1-recreation	[jjs28]: Is this informal parking causing or likely to cause any kind of shoreline degradation?	No. Parking is along a paved road.	JCP
29.	5.1.1.1-trans	[jjs29]: This sounds interesting; can you give a quick summary of the project?	No. See www.bridgingthevalley.org , I emailed you the link.	JCP
30.	5.1.3.1- recreation	DAP30-Need to characterize velocities better than to say the "Backwater...is present." Especially at higher flows, there is significant current at this reach	Revised to better reflect conditions.	JCP
31.	5.1.3.1-Shoreline Modifications	[DAP31]: This issue is far from over and it is Ecology's carefully evaluated position that docks should be prohibited in this reach, both because of impacts on the river and public user, but also due to cumulative impacts to shoreline plant communities and habitat	Revised by adding discussion on permitting and potential effects, including cumulative impacts. Note that all agencies review letters commented on this.	JCP
32.	5.1.3.2-phys. characterization	[DAP32]: This is a good characterization and is a good standard for other SMPs. It represents a significant improvement over the City of Spokane Inventory.	thanks	NH/JCP
33.	5.1.3.3-High Quality Cons. Areas	[DAP33]: This is a well-intended effort to characterize areas which should not be disturbed, but is not tied to distinct metrics. The broad category of "high quality" also was applied to popular recreational areas regardless of their ecological function, and was also applied to large monotypical stands of large, introduced European white willow and golden willow trees in the vicinity of the confluence of the Spokane and Little Spokane rivers. Remove this reference while retaining the description of these important areas. A better terminology is needed.	Within the COSV, the areas described as high quality conservations areas are attributed to healthy, mature, intact bands of native riparian forest. I've documented this in the report to make sure it is clear that this description is related to habitat conditions (rather than recreation, etc.). This rationale seems relevant to the shoreline characterization so I've left it in for now.	NH
34.	Throughout	Minor text edits made in track changes through document	Incorporated	NH/JCP
35.				
36.				



Comment Response Form

Document Reviewed:	City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)						
Subject:	Shoreline Planning	Commenter:	Bill Gothman, COSV	Comment Date:	2-27-2010	Response Date:	4/5/2010

No.	Ref.	Comment	Response	
1.	5.3 and 6.4.3- future use of gravel pits	<p>I thought the discussion about the aggregate mines (gravel pits) was thoughtful and accurate, and for the most part thorough. However, some discussion of the future of these water bodies is warranted. There is a general tendency to think they should forever be closed off from public use because they expose the aquifer, but stepping back to realize that this is what most naturally formed lakes also do often produces a calming effect. Very high quality fisheries can be sustained in lakes of this size and bathymetry, with the high water quality. Experience in other parts of the US demonstrate that recreational use of lacustrine water bodies which form critical elements of major municipal and regional water supplies can be successfully managed to protect water quality.</p> <p>A discussion of the future of the Park Rd. and Sullivan Rd. lakes is warranted in the sections on opportunities for ecological restoration and the Use Analysis. For process purposes, another discussion series is warranted with the owner - operators of the current active surface mines, to explore options for the future beyond the active economic lives of these mines.</p>	<p>Expanded Section 6.4.3 a bit to address comments. We have spoken with Central Premix and the City about potential future uses. Please review and comment and if there are additional ideas we can address prior to completion of the final document.</p>	JCP/NHB

No.	Ref.	Comment	Response	
2.	Section 6.2- Additional detail on projected recreation	2. Water Trail – Some of you attended at least parts of this week’s Spokane River Forum, so you know discussion of public access and recreation needs to be expanded to address more in - depth analysis of the diversity and scope of current and reasonably foreseeable future public use of Spokane River shorelines within the city. The very recent emergence of a Water Trail proposal for the entire river in Spokane County (and perhaps into Kootenai County to the east) should be a specific area of discussion, since it involves elements of public access, recreation, and protecting shoreline ecological functions. Unlike the unrealized promises and potential of the Centennial Trail to date, the Water Trail also encompasses possibilities for interpreting the natural and cultural history of the river and the landscape through which it flows. These are all purposes within the scope of the SMA and local SMPs, so should be addressed.	<p>Added reference to the water trail.</p> <p>I would like to add that I appreciate these comments; they have helped us focus on an important element of the use analysis that had not been addressed previously and is not very clearly defined in WAC 173-26. Thanks</p>	JCP
3.	Section 6.2- Additional detail on projected whitewater recreation	3. Whitewater – At least five sites have been identified or proposed for whitewater parks along the Spokane River, all located in reaches and on top of channel forms which are critical to native fishes and the aquatic macro - invertebrates upon which they feed. Several of these are located within the corporate limits of Spokane Valley, so are a “reasonably foreseeable use” which should be specifically addressed in the Use Analysis.	Reviewed the REP initial siting study done in 2005, none of the sites are within the COSV. However, there is a short discussion on enhancements of the entire reach between Barker and Sullivan that has been included.	JCP
4.	Section 6.2- Future Bridges	4. Bridges – both conventional transportation bridges and those envisioned for recreational purposes are significant perturbations on river channels and shorelands. At least one proposal for a recreational bridge across the Spokane River in the Spokane Valley has been published in the Spokesman Review. These need to be addressed in the Use Analysis.	The reference to the pedestrian bridge is in the City of Liberty Lake. Added a short discussion on bridges in general.	JCP



Comment Response Form

Document Reviewed:	City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)						
Subject:	Shoreline Planning	Commenter:	Jason McLellen, Ecology	Comment Date:	2-19-2010	Response Date:	4/5/2010

No.	Ref.	Comment	Response	
1.	Page 12, Comment 1	Redundant having both rainbow and redband trout listed. Columbia River redband trout (<i>Oncorhynchus mykiss gairdneri</i>) are a subspecies of rainbow trout (<i>Oncorhynchus mykiss</i>) (Behnke 1992). A genetic inventory of rainbow trout indicated we have a virtually pure population of Columbia River redband trout in the Spokane River (Small et al. 2007).	Text updated	NBH/JCP
2.	Page 12, Comment 2	This statement is not accurate. Steel head are the anadromous life history form of rainbow trout. Thus, rainbow trout, including steelhead, native to the Columbia River drainage east of the Cascade Mountains are Columbia River redband trout (Behnke 1992).	Text updated	NBH/JCP
3.	Page 12, Comment 3	Only in areas where the anadromous life history form has been eliminated.	Removed	NBH/JCP
4.	Page 12, Comment 4	This is not accurate for the Spokane River. A genetic inventory showed little hybridization between hatchery (coastal origin, <i>O. m. irideus</i>) stocks of rainbow trout and redband trout in the Spokane River drainage (Small et al. 2007).	Removed	NBH/JCP



Document Reviewed:	City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)						
Subject:	Shoreline Planning	Commenter:	Karin Divens, WDFW	Comment Date:	3/10/2010	Response Date:	4/5/2010

No.	Ref.	Comment	Response	
1.	Chapter 3, Regional Characterization	The shoreline analysis in this chapter is a comprehensive inventory of ecosystem-wide processes and ecological functions in habitats within shoreline jurisdiction in the City of Spokane Valley. However, the inventory of species and habitats in Section 3.2 Spokane River Biological Resources does not include all state listed species related to or affected by shoreline planning. In Spokane County, amphibians, such as western toad, also depend on freshwater shoreline habitat in the county. The following link will take you to WDFW’s Priority Habitat and Species website http://wdfw.wa.gov/hab/phslist.htm . County Specific Lists of Species and Habitats are also available at this site under Related Links on the left hand side of the page.	A complete list of Priority Species was added as Table 3-2 in the revised report	NBH
2.		The characterization does not include species that are Sensitive or Candidates for listing and therefore vulnerable of becoming Endangered or Threatened without removal of threats. We have enclosed a list of priority species found in the WDFW priority habitats and species database for Spokane County (http://wdfw.wa.gov/hab/phspage.htm). We recommend including these species in your characterization report to inform policies and regulations that will adequately protect the existing habitat functions upon which these species depend.	See above	NBH
3.	Additional Comments on the Species List	Osprey, while included as a species of Local Importance in Spokane County, is no longer included as a priority species and is not included on the State Monitor list.	Osprey reference removed.	NBH

No.	Ref.	Comment	Response	
4.		<p>Section 3.2: References to Rainbow trout as well as Redband trout. WDFW has conducted genetics work under the Joint Stock Assessment Program and the redband trout have been found to be genetically distinct, wild fish. It is redundant to have both redband and rainbow trout listed. Columbia River redband trout (<i>Onchorynchus mykiss gairdneri</i>) are a subspecies of rainbow trout (<i>O. mykiss</i>) (Behnke 1992). A genetic inventory of rainbow indicates we have a virtually pure population of Columbia River redband trout in the Spokane River (Small et al 2007). For more information and to further improve the accuracy of the Characterization Report, please refer to the specific comments provided by Jason McLellan, WDFW Fisheries Biologist, forwarded through Doug Pineo, Ecology.</p>	Updated per Jason McLellen's comments	NBH
5.	<p>Section 3.5 Regional Processes, Stressors and Opportunites for Improvement</p>	<p>Erosion:The Spokane River, particularly the upper reaches is not a wood controlled system nor in the past is it believed to have been wood controlled. The upper reaches of the river look much the same today as the reaches look historically indicating a system that is somewhat stable overtime. WDFW looks at the movement of bedload and channel changes that may occur with high flow conditions as a positive change. The embedded conditions that exist in the Spokane are not indicative of a natural river condition. It takes extreme high flow events (1996/1997) to move the bedload. The HEDs on the river do alter the natural flow regimes, restrict flows, and limit gravel recruitment downstream. The limited sources of gravel feeder bluffs and the operation of HEDs has resulted in a <i>gravel</i> starved system. This lack of gravel recruitment is believed to be one of the limiting factors effecting trout production in this reach.</p>	Table 3-3 changed to reflect this information.	NBH
6.		<p>Flooding: WDFW does not look at flooding as negative, but rather as a natural river process. Streams and rivers are supposed to be allowed floodplain connectivity and natural channel migration. It is the process of shoreline development and a controlled system that has resulted in flood control and resulted in altered natural shoreline and riverine processes.</p>	Agreed; table changed to describe flooding as a natural process that has been affected by HEDs and has resulted in altered fluvial processes, including those described in the above comment.	NBH
7.		<p>Solarization: The main temperature issue in the upper Spokane is due to the operation of the HED upstream in Post Falls. Temperature is considered to be a factor in reduced survival of juvenile salmonids. The warmer water also supports the non-native smallmouth bass.</p>	Table updated to reflect the relative importance of cold water input from the aquifer rather than merely focusing on shade from vegetation.	NBH

No.	Ref.	Comment	Response	
8.		Fish: While the upper river habitat structure could be ranked as fair to good, the water quality parameters, particularly instream flow and temperature, force the ranking under Condition to be Poor. WDFW is quite concerned with the population decline of native redband trout in the Spokane River and as described above, this is likely linked with reduced spawning material, increased temperature, low recruitment success, and predation.	Table updated accordingly	NBH
9.		Wildlife: Provide a source for the rankings. While some areas might have suitable habitat, development limits the functional use of the river by some wildlife species. The railroad, highway, residential, and commercial development have all limited the habitat available for species.	Additional detail provided for condition findings.	NBH
10.		Other: WDFW suggests adding Residential Development as a process so that docks, danger tree removal, private boat ramps, shoreline armoring, trails, riparian impacts, loss up upland habitat and connectivity are all examples that can be included. Homeless encampments are also an issue along the river within the City.	Added to Table 3-3	NBH
11.		Other: Poaching is another Stressor on the native trout resources. WDFW has recently increased enforcement patrols to try to get control of the increased illegal fishing taking place on the already stressed population. Activity includes angling out of season, not practicing catch and release, and illegal use of bait in baitless/barbless area.	Noted under stressors to Fish in Table 3-3	NBH
12.		5.0 Local Characterization:	Fish: Include Redside shiner and sculpin spp. in the list of fish species found in the Spokane River system. Bull trout, Chinook salmon, and northern pike could also be added to the list of species that are occasionally noted– though all are entrained from the Couer d’Alene system.	Added.
13.		Critical Areas: Fish and Wildlife Habitat Conservation Areas extend above the OHWL. For example, the WDFW recommended riparian habitat width is 250 ft. This extends well above the OHWL. Stating “below the OHWL” may cause confusion.	The current critical areas ordinance for fish and wildlife habitat conservation areas is related to the WDFW priority habitats. As you know, these are being updated and the current “Urban Natural Open Space” category is being removed. Thus the future designation will likely be one for “Fish Habitat Conservation Area” (below the OHWM) and a separate designation for “Riparian Habitat Area”, which I have described as areas within up to 250 feet from the OHWM on page 26.	NBH

No.	Ref.	Comment	Response	
14.		<p>Shoreline Modifications: The City has an opportunity to address cumulative shoreline impacts under this update process. Addressing cumulative shoreline impacts is a requirement under the Ecology’s SMA and relying on WDFW to address these impacts under the hydraulic code is problematic at best. WDFW does not have the authority to address cumulative impacts from individual applications and can only deny projects on the basis of impacts to fish life. WDFW encourages the City to take this opportunity seriously and set an appropriate standard for future shoreline developments.</p>	<p>Cumulative impacts will be addressed specifically under the next element of the SMP update process.</p>	NBH
15.	<p>Management Recommendations</p>	<p>WDFW produces management recommendations supported by best available science. Management recommendations are most appropriate to inform protection standards, but may also inform shoreline analysis recommendations. Sources include:</p> <ol style="list-style-type: none"> 1. The updated PHS list includes electronic links to PHS management recommendations and single-page recommendations, recovery plans, living with wildlife program, and NatureServe Species Reports for all priority species. (http://wdfw.wa.gov/hab/phsrecs.htm). Management recommendations most commonly applied to SMP updates are: <ol style="list-style-type: none"> a. Washington’s Priority Habitats: Riparian (1997), http://wdfw.wa.gov/hab/ripxsum.htm 2. <u>Trout Recovery:</u> A sampling of agency recommendations include: <ol style="list-style-type: none"> a. Aquatic Habitat Guidelines, http://wdfw.wa.gov/hab/ahg/, covering a number of topics related to shoreline protection and restoration. b. WDFW Wild Salmonid Policy (1997): http://wdfw.wa.gov/fish/wsp/wsp.htm c. WDFW, Ecology, and DOT. Alternative Mitigation Policy Guidance: http://wdfw.wa.gov/hab/ahg/altmtgtn.pdf d. Land Use Planning for Salmon, Steelhead and Trout (Knight 2009); http://wdfw.wa.gov/habitat/plannersguide/index.html 	<p>Thank you for summarizing and providing links to all of these guidance documents! The existing characterization repeatedly recommends riparian enhancements, which I believe is consistent with the riparian priority habitat guidance. This will be further elaborated upon in the forthcoming shoreline restoration plan, which is a separate element of the SMP update process.</p> <p>Per our conversations, most of the limiting factors related to trout recovery have to do with factors outside of the City’s boundaries and beyond their control (e.g. HED flow controls). I have tried to acknowledge the issues present within the City and focus on shoreline planning activities that are within the control of the City. These include protecting the cold water refugia west of Sullivan Rd, where the stream is recharged by the aquifer. McLellen reports that this area is where most of their fish were captured during stock surveys conducted between the state line and Plantes Ferry park so I’ve tried to highlight thermal protection of this habitat as a priority. Please let me know if there are other WDFW recommendations that apply to trout recovery, which are within the City’s ability to implement and that I have not already addressed.</p> <p>Thank you very much for your comments!</p>	NBH



Comment Response Form

Document Reviewed:		City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)					
Subject:		Shoreline Planning	Commenter:	Walt Edelen, SCCD COSV	Comment Date:	Response Date:	4/5/2010
No.	Ref.	Comment			Response		
1.	Page 5	It should state Spokane County Conservation District, not Service			Corrected		JCP
2.	Page 11, 3 rd paragraph	It should read, According to Spokane County Conservation District's,			Corrected		JCP
3.	Page 11. 3 rd paragraph	States that the PFC rates the Spokane River as poor to fair ecologically. This is inaccurate. The PFC states that the Spokane River, ecologically, is fair to good. The PFC reported 24% as Good, 55% Fair, and only 21% as poor			Checked the GIS database, revised to state fair to good.		JCP
4.	page 13	Scientific names of plants should be italicized on.			Corrected		NBH
5.		Your water quality section is rather sparse. I would have expected a lengthy section with all the TMDL efforts and data collected over the years.			Appreciate the comment; we tried to summarize the water quality issues that might affect the planning efforts within the City of Spokane Valley. Metals, PCBs, PBDEs are the contaminants listed for the waters within the COSV. Non-Point nutrient sources are also an important management issue for the P. TMDL. Some additional text was provided regarding temperature and DO issues.		JCP/NBH
6.	Page 14. NPS	Your first sentence needs restructuring. It reads as though you are promoting decreased use of urban runoff and fertilizers.			Revised		JCP
7.	Shelley Lake	Might want to add something about the large waterline fluctuation of Shelley Lake due to the spring runoff. There is a significant drop by summer without the pumping.			Added		jcp

8.	page 17	Would one of your issues be instream flows? What about impacts of Post Falls dam?	Agreed – Added to table	NBH/JCP
9.	Page 21. 2 nd paragraph	Ends with relatively recently. Change that to recently	Thanks – revised that paragraph extensively.	JCP
10.	Page 21. Shelley Lake section	No mention of slaughterhouse history & use. Dumping of carcasses in Lake? Probably not needed.	I have heard about the slaughterhouse history and carcass dumping but have not been able to find any written documentation to reference, little impact on current management practices.	JCP
11.	Page 24.	It may be important to enhance the riparian corridor, but there are areas that need to be protected from development encroachment. High quality areas that need restrictions likely greater than the SMA or local ordinances.	Agreed, out of scope for SMP. For example, the Steen Road Gravel pit should be protected as an overflow for Shelley Lake. There are also areas of intact prairie as well as wooded areas that should be recognized in the GMA critical areas.	JCP
12.		It would be helpful to have the River Miles stated for the Study Segments in the documents. I could line up other things with that information	Agreed, RMs added	JCP
13.	Page 31	I think this area is a Rosgen channel type C2 or C3. Not sure it matches up with PFC work	Yes, C3 likely (cobble sub). Text added.	NBH
14.	Table 5.5	I realize the one plant association comes out to 0%, but it just doesn't look good to the general reader	Changed to "<1%"	NBH
15.		I do like the fact that you researched the amount of impervious surfaces within the riparian zone. Great data	Thanks, hopefully it can be used in the future as an element to address cumulative impacts and no net loss.	JCP
16.		I was a little confused as to how you have 144.6 acres of plant associations within your 88.5 acres of Segment 1. Is this due to that the 88.5 is just the amount under jurisdiction?	The total is 114.6 acres of plant associations (not 144.6). This includes 88.5 acres above the OHWL (shorelands) and 26.1 acres below the OHWL (frequently flooded willows).	NBH
17.	Page 41	The statement regarding the SCCD report and adequate riparian vegetation of greater than 60 ft. I think this interpretation is not entirely accurate. The SCCD report indicates that this area had a riparian width similar to the previous reach (in the report – reach 4). It actually states an average riparian width of 0-50 ft and that it the reach was dominated by discontinuous narrow bands of vegetation. Overall, the reach is fair to good on habitat.	Removed statement.	JCP
18.	page 41	I do like the paragraph where it states that more trees need to be added for restoration efforts.	Thanks	NBH

19.	Page 43	Coyote Development. Who has determined that a 75' buffer is adequate? What types of access are they trying to get with permits?	Believe that the buffer was set under the previous (existing SMP) guidelines. COSV adopted Spokane County's. It is an interesting situation that has had many comments. We assume that as lots are developed the homeowners will work towards direct river access from each lot.	JCP
20.	5.1.4	SR-4 – areas behind upriver dam are subject to wake action due to boating activities. Local residents complain of this regularly. Lots without adequate vegetation are suffering streambank erosion issues	Thanks, comment added. From the public meetings we have received comments about erosion due to wave action and also a request to remove the “no wake zone” requirement.	JCP
21.	5.2	The trail around Shelley Lake has mooring areas for non-motorized boats? I didn't see any last year.	There are a few posts driven into the banks so that non-motorized boats can be moored.	JCP
22.	5.2	The east side of Shelley Lake has a nice High quality area including the granite rock, Ponderosa Pine community and some alder communities	Agreed – this area is included in the inventory.	JCP
23.	General comment	There should be better spacing between some of the text and the figures in the document. It may be a formatting issue	Agreed, will try to catch them all.	JCP
24.	Page 65. Last paragraph	Misspelled word (t). the word “it” is missing the “i”	Corrected.	JCP
25.	5.1.3.3 & Section 6.3	I do not think dock permitting should occur within the Spokane River at the Coyote Development site. This is not protection of the shoreline and preserving its natural character. Don't allow this activity to degrade a great City asset.	Agency and public comments have been received about this. Since the development was platted under the old SMP guidelines not sure what the outcome is going to be at this time.	JCP
26.	6.4	Your Recommendations section does not include any restoration plans for the shorelines. Why not? You could work with local agencies, especially the SCCD to accomplish this.	A separate Restoration Plan will be developed, similar to the City of Spokane's. We look forward to working with the SCCD and other agencies and user groups on this element of the SMP.	JCP/NBH
27.	General	Overall, I think you have a done a good job on the inventory section. Please contact me if you have any questions regarding my comments	Thank you	JCP/NBH



Comment Response Form

Document Reviewed:	City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)						
Subject:	Shoreline Planning	Commenter:	Randy Person, WSPRC	Comment Date:	3-11-2010 & 3-22-2010	Response Date:	4/5/2010

No.	Ref.	Comment	Response	
1.	General- “Centennial Trail” vs. Spokane River Centennial Trail	Spokane River Centennial Trail – the document routinely refers to the trail developed by the Washington State Parks and Recreation Commission, and maintained through an interagency agreement, as simply “Centennial Trail.” We recommend that the more complete reference “Spokane River Centennial Trail (SRCT)” be used. Although it’s not a bad reference in context, there were several other “Centennial Trails” constructed in Washington at about that time, and using the full reference will make it easier in the future, especially for digital search engines.	References changed to SRCT.	NBH
2.	General- SRCT boundary on maps	The SRCT is mentioned often as an important feature. At times it is a landmark, at other times its presence as a barrier is noted. Unfortunately, only the map in figure 5-4 on page 42 actually shows the alignment of the trail within the shoreline zone. Wherever possible, please show the actual trail alignment. We can help with this – GIS data is available for the asking, that shows State Park ownership, as well as the trail alignment. Please contact Kathryn Scott at Kathryn.Scott@parks.wa.gov , or (360) 902-8691 to work out the details.	To improve the clarity of maps, the SRCT was generally not shown in the small graphics contained within the report. Because the trail crossing over the river in SR-3 is described in detail as a point where parks ownership, and the natural buffer it provides, ceases to exist to the west, it was shown on Figure 5-4. However, the trail boundary is shown on maps in Appendix E.	NBH
3.	Landmarks/ Maps	In a similar vein, the text is full of landmarks and other geographic references, which some of us are unfamiliar with. Categorically, maps showing the locations of all the referenced items should be included. It is difficult to fully understand the written information without some idea of the physical relationships being discussed.	Appendix E was later provided to WSPRC. Maps within Appendix E shows the location of these landmarks.	NBH
4.	Incorrect landmark description, page 69	The second paragraph on page 69 discusses potential for non-motorized watercraft access near Coyote Rock, “just west of Mirabeau Point.” Is this correct? Our reading of the maps shows the Coyote Rocks area lying just westerly of Myrtle Point, with Mirabeau further upstream.	Good catch, Myrtle Point is correct	JCP

No.	Ref.	Comment	Response	
5.	Shoreline designations versus access	Speaking of development, please consider the ongoing need for public access to the shoreline during discussions of shoreline designations, appropriate uses, and development regulations. This report describes a number of areas with social trails leading to the water edge. The demand to reach this special area is high, and the need to protect the shoreline is also high. We recognize that often the best solution is appropriate development of designated facilities such as paths, viewing platforms, and hand carried watercraft launch and retrieval facilities. Providing carefully designed convenient access facilities directs use, and helps protect adjacent fragile natural areas.	This will be addressed in policies goals and development regulations. We have had discussions with Chris Guidotti, Riverside State Park Manager about this topic.	JCP
6.	Shoreline designations versus access	To be able to provide useful public access facilities and thereby limit impacts, it is important that public access facilities be shown as “permitted uses” in publically owned shoreline areas, and especially those lands that contain the SRCT. Appropriate development regulations will then help assure that facilities are well designed and strike a good balance between public access and preserving most of the shoreline’s existing natural character.	See response to comment 5.	JCP
7.	Contact info./mailing list request	Please add the address local.government@parks.wa.gov to your mailing list. This site is monitored regularly. Sending there will assure a timely response that is not dependent on one individual.	City has added this email address to the mailing list.	COSV
Note: the following comments were provided separately on March 22, 2010:				
8.	Appendix E; various map panels	<p>The Shorelines by Section map certainly shows the SRCT very accurately. Those same maps could be made more useful with just a little more label work. Some examples:</p> <ul style="list-style-type: none"> • E-5i shows the Sullivan Road area, with several parking areas near the river. I might presume the one west of Sullivan, closest to the river on the north bank, is public recreational parking, and the others are business related. A short label in these relatively clear areas would clarify things. If the parking on the north side is intended for access to the SRCT, by walking across the bridge, that could even be stated. • E-5o could easily label Myrtle Point. • E-5j shows an unidentified railroad bridge 	The City of Spokane Valley is preparing the map portfolio (Appendix E of the Technical Review Draft). Comments 8-11 have been forwarded to the City and will be addressed by Dan Neyman, GIS specialist with the COSV.	NBH/ DN (COSV)
9.	General mapping note	In general, take the attitude of an ignorant (though intelligent) person viewing the area for the first time through your maps. Don’t crowd them with so many notes that you can no longer see the features, but the scale used allows a lot of room for helpful labels.		

No.	Ref.	Comment	Response	
10.	Mapping- page size issue	<p>And speaking of scales . . . Even here at the office, my print default came up at 8 ½ x 11. If I was an interested citizen viewing these from home, I may well have a printer that could not produce 11 x 17. Especially today, when digital output is so controllable by the end user, it is important to have a scale that works. The text 1" = 200' does not. It should be replaced (or augmented) with a graphic scale, which was well done on E-4. No matter what size the output, one can then accurately determine distances.</p>		
11.	General mapping comment	<p>I'm still not sure that I could pick out each area in the Audubon report, but I have a much better idea of the site conditions with the draft inventory maps. Although a day in the field exploring the river would be great, I'm probably destined to help coordinate our responses from Olympia, so the printable product is very important for me.</p>		



Comment Response Form

Document Reviewed:	City of Spokane Valley Shoreline Inventory & Characterization Report (Tech. Review Group Draft)						
Subject:	Shoreline Planning	Commenter:	Bill Gothman, COSV	Comment Date:	2-27-2010	Response Date:	4/5/2010

No.	Ref.	Comment	Response	
1.	P14, "Municipal Wastewater" paragraph	1 st line, Coeur d'Alene misspelled	Thanks – fixed	JCP
2.	P30, 6 th paragraph	Would you want to mention that the Barker Bridge project involves removing several old piers from the 1910 bridge and constructing a bridge with fewer piers than the 1935 (?) bridge?	Revised slightly, good comment.	JCP
3.	P32, Table5-5	Abbreviations not defined (also in other tables of the document)	Abbreviations thrown out- plant names spelled out.	NH
4.	P41, bottom line	"tunnel our walkway" should it be "tunnel or walkway"??	Thanks- fixed	JCP
5.	P44, 3 rd paragraph	would you want to mention the action to remove and analyze concrete dust to see if it has a use in capping land fills?	Revised to indicate that initial studies are being done.	JCP
6.	P65 , 3 rd pgh, first line	change "the primary affect" to "the primary effect"	Thanks –fixed	JCP
7.	P65 4 th line from bottom	chg "t" to "it"	Thanks- Fixed	JCP
8.				
9.				