



State of Washington

Department of Fish and Wildlife

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February 25, 2015

Washington Department of Ecology
Eastern Regional Office
Attention: Jeremy Sikes – Shorelands and Environmental Assistance Program
4601 N. Monroe St.
Spokane, WA 99205

Dear Jeremy:

SUBJECT: PUBLIC COMMENT REQUESTED ON THE CITY OF MOSES LAKE'S PROPOSED UPDATE TO ITS SHORELINE MASTER PROGRAM

The Washington Department of Fish and Wildlife (WDFW) appreciates this opportunity to comment on the proposed shoreline master program (SMP) update that has been submitted to Ecology by the City of Moses Lake. At their request for comments on the proposed SMP updates, WDFW responded to the City of Moses Lake's Planning Commission and Planning Department with a letter dated July 9, 2014 (enclosed). Some of the recommended changes from that letter have been addressed in the most recent SMP update version submitted to the Department of Ecology for review, while other recommendations have not been incorporated. WDFW would like to take this opportunity to highlight those recommendations that were made in the July 2014 letter which are not reflected in the submitted SMP updated proposal.

Natural Environment- Natural environments in the City of Moses Lake contain the most intact riparian environments within the city and provide the best protection to riparian area functions. However, according to table 9.3, buffers in Recreation Areas for water-dependent uses are allowed to be reduced to 0'. Transportation facility setbacks are allowed to be reduced to 100' or 150'. Higher intensity water-dependent uses which require buffer widths to be reduced to 0' and transportation facility uses are not physical alterations which 'serve to protect or enhance any significant, unique, or highly valued feature...', which is the stated policy for natural environment areas in the City of Moses Lake. **WDFW recommends water- dependent and transportation facility uses not be allowed in areas designated as Natural within the City of Moses Lake.**

Shoreline Residential Special Resources (SR-S) Environment- Shoreline areas designated SR-S within the City of Moses Lake demonstrate some ecological impairments, but '...they also retain important ecological functions and have high potential for ecological protection and restoration because they include relatively large tracts that have not been subdivided or include large wetland areas.' (Table 9.1) Proposed buffers listed in Table 9.3

for SR-S designated areas that could hinder properly functioning ecological conditions or interfere with future restoration efforts include the allowed buffer reduction for Aquaculture water-dependent structures and facilities to 0', Boating water-dependent facilities to 0', and Recreation water-dependent uses and paths and trails reduced to 0' and 15'. **WDFW recommends Aquaculture, Boating Facilities, and Recreation water-dependent uses not be allowed unless absolutely necessary in SR-S designated areas within the City of Moses Lake and that required buffers for recreational trails be expanded to a minimum width of 25'.**

Shoreline Residential Resource (SR-R) Environment- SR-R designated lands, similar to SR-S lands, demonstrate impairments to ecological functions, but 'They retain important ecological functions and have the potential for development that is compatible with ecological protection and restoration.' (Table 9.1) Proposed buffers in table 9.3 that could hinder properly functioning ecological conditions and impair potential restoration efforts include 0' and 50' buffers for Aquaculture water-dependent and water-related structures, 50' Commercial water-related and water-enjoyment buffers, and 35' & 10' Recreation water-oriented uses and Recreational path/trail buffers. In addition, 25' and 50' buffer widths are allowed for dwelling units and non-water-dependent accessory structures in Residential uses areas. **WDFW recommends buffers for water-related, water-dependent and water enjoyment structures and facilities in areas that are currently functioning properly or may possibly be restored to proper functioning conditions be set at a minimum of 65' wide and buffer widths for paths and trails should only be allowed to be reduced to 25'. Residential uses should have the buffers expanded to a minimum of 65' to retain most functioning conditions and allow for adequate restoration of degraded areas.**

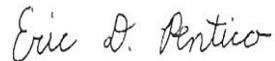
High-Intensity Resource (H-R) Environment- H-R designated lands demonstrate impairments to ecological functions, but 'They retain important ecological functions and have the potential for development that is compatible with ecological protection and restoration.' (Table 9.1) The proposed buffers listed in Table 9.3 that could hinder properly functioning ecological conditions and impair restoration efforts include 50' buffers for Aquaculture water-related structure and facilities, 50' buffers for Commercial water-dependent and water-enjoyment structures, and 35' & 10' buffers for Recreation water-oriented uses and Recreational paths/trails. For Residential use areas, buffer reductions to 25' are proposed for dwelling units and non-water dependent accessory structures. **WDFW recommends buffers in areas retaining some properly functioning ecological conditions or may be restored should be set for water-related, water-dependent and water-enjoyment structures and Recreation water-oriented uses to a minimum 65' buffer width. Buffer widths for Recreation paths and trails should only be allowed to be reduced to 25'. WDFW recommends buffers in Residential areas be expanded to a minimum of 65' to retain most functioning ecological conditions and allow for adequate restoration of degraded areas.**

Shoreline Residential Dunes (SR-D)- The SD-D designated areas have '... been found to be relatively intact as regards ecological functions.' and '...has high potential for planned

development that combines limited residential use with ecological protection and restoration.'(Table 9.1) Table 9.3 indicates ecological functions and restoration potentials are being adequately protected in most cases. A planned development permit is required for Residential uses. **WDFW recommends that a 65' buffer be required to retain most functioning ecological conditions and allow for adequate restoration potential of degraded areas.**

As stated in the July 2014 letter, the shorelines of Moses Lake enrich the citizens of Moses Lake and Washington State by providing visually pleasing landscapes, filter pollutants, and providing irreplaceable habitat for fish and wildlife. WDFW believes the inclusion of the above stated recommendations into the City of Moses Lake's SMP will likely assure no adverse effects due to development and achieve the no net loss of ecological function standard stated in the Shoreline Management Act.

Sincerely,



Eric D. Pentico
Area Habitat Biologist

cc: Carmen Andonaegui – WDFW Region 2 Habitat Program Manager
Keith Folkerts – WDFW Land Use Policy Lead
Anne Henning – Senior Planner, City of Moses Lake Community Development Department