



Anita Marrero
Monroe Community Development Department
806 West Main St.
Monroe, WA 98272

Via email to: amarrero@monroewa.gov

Re: City of Monroe Shoreline Master Program update

Dear Ms. Marrero,

Please accept the following comments from the Snoqualmie Indian Tribe (Tribe) Environmental and Natural Resources Department regarding the City of Monroe's (City's) 2019 Shoreline Master Program (SMP) update. Thank you for the opportunity to provide comments.

The City of Monroe's watertyping code is not completely up-to-date with the preferred, recommended statewide approach. As the City undertakes the current CAO/SMP update, we urge the City to refer to the Washington Department of Commerce (Commerce) Growth Management Critical Areas guidance (<https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/critical-areas/>). As the 2018 update to Commerce's Critical Areas Handbook explains on page 12 of Chapter 2:

WDNR's water typing system has been under review by the Forest Practices Board for the past several years. In December 2006, the Forest Practices Board adopted an interim water typing system that transitioned from a mapping system that used numbers (i.e., Type 1 through Type 5) to the lettering system shown below...

Interim Stream Typing Symbology

Type "S" (for Shoreline)

Type "F" (for Fish)

Type "Np" (for Non-fish, perennial)

Type "Ns" (for Non-fish, seasonal)

Old Stream Typing Symbology

Type 1

Type 2 and 3

Type 4

Type 5

The City's code, as published online, currently uses the older, outdated numbering system. Please revise the system to the current Interim Symbology as recommended by Commerce and the Tribe.



The Commerce guidance also explains that Washington DNR’s water typing maps are extremely unreliable outside of forestry areas. As stated on Page 13 of the 2018 guidance update: “Local governments should field-verify stream presence/locations and, if the stream is shown as non-fish bearing (i.e., Type Np or Ns), this should also be field-verified. WDFW habitat biologists are able to help with stream typing (this is the preferred way to verify stream types); alternatively, a qualified biologist can apply WDNR’s current stream classification methodology.”

Additionally, we suggest that City code should clarify that “fish habitat,” per WAC 222-16-030 “means habitat which is used by any fish at any life stage at any time of the year, including potential habitat likely to be used by fish which could be recovered by restoration or management and includes off-channel habitat.” Please note that while additional special consideration for salmonids may be appropriate per the GMA, we wish to emphasize that all “fish habitat” must be protected and that this is much more extensive than only salmonid habitat, and includes “potential habitat” as cited above. Also notable is that “potential habitat likely to be used by fish which could be recovered by restoration or management” means that stream reaches which contain fish habitat per the state rules, but which are blocked to fish passage by manmade barriers downstream, regardless of who owns the barrier, must be considered fish habitat, since barrier removal and fish passage restoration and use of the potential habitat could be achieved at such locations.

Thank you for the opportunity to comment. We hope that the City will update its watertyping system to the currently recommended approach, in keeping with Best Available Science. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Baerwalde".

Matt Baerwalde
Water Quality Manager
Snoqualmie Indian Tribe
425-363-2008