



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

April 30, 2010

City of Port Orchard
Planning Department
Associate Planner Jennifer Haro
216 Prospect Street
Port Orchard, WA 98366

RECEIVED
MAY 05 2010
CITY OF PORT ORCHARD
PLANNING DEPARTMENT

Re: Ecology Comments on City of Port Orchard (March 2010) Draft Shoreline Inventory and Characterization Report

Dear Jennifer Haro:

Thank you for the opportunity to review the City's Draft March 2010 Shoreline Inventory and Characterization Report. This report is being reviewed for consistency as part of Task 2.1-2.3 of SMP Update Grant Agreement G1000018, between the City of Port Orchard and the Washington State Department of Ecology. This document is complete in providing the necessary background information required of an SMP update inventory. The report covers approximately six linear miles of shoreline. This includes approximately three miles of marine shoreline, along Sinclair inlet, and three miles of shoreline along Blackjack Creek. This also includes UGA areas, which the City is pre-designating, in anticipation of future annexation.

Throughout these comments, it will be helpful to refer to the following attached documents:

- Draft Potential No Net Loss Indicators (NNL-Indicators)
- SMP Handbook Chapter 7 Shoreline Inventory and Characterization (guidance)
- Port Orchard Freshwater Ecosystem Wide Assessment (Blackjack Creek)

Sections (1) Introduction, (2) Methods, (3) Ecosystem Wide Processes, and (4) Watershed Processes:

Chapters 1-4 reflect an overview of what is known, to date, about Port Orchard shoreline water quality issues, general land uses and current physical and biological conditions. The report uses a complete and comprehensive compilation of recent information available for Port Orchard shorelines, inclusive of its uses, conditions and available public access opportunities. Overall, the report does a good job of identifying and compiling the appropriate data on the physical and biological nature of the City's shorelines, as they pertain to the requirements of the Washington State Shoreline Management Act. The document contains a very good introduction to the purpose of the document, the study area and the report methodology. In addition to compiling and presenting relevant data, the report also contains appropriate mapping products required for shoreline inventorying.

INVENTORY OBJECTIVES

An important function of the inventory is the identification of issues and solutions to assist the City in its development of shoreline designations, policies and standards to help the City achieve no-net-loss of present ecosystem conditions, with future development. Important to this end, is the creation of a document that can serve as an easy-to-reference transparent tool for the staff and the general public to understand the conditions of particular shoreline areas. This includes the uses of those shorelines and what actions can be taken to enhance, restore or protect shoreline processes, given present uses, environmental conditions and issues, both at the reach scale and within the contributing basin. In particular, the document must address ecosystem wide processes outside of shoreline jurisdiction and indicate their relationship to shoreline issues. This can be done effectively by using a simple table format discussed below in comments on Chapter 7. In short, it is important for the inventory to serve as a tool for policy development, future project planning, permitting, policy making and public education.

The following comments are intended to assist the City, in its ability to use the information it has compiled and formatted, to set baselines, evaluate cumulative impacts and chart a course to achieve no net loss of ecological functions over the next decade's implementation of an updated SMP.

Chapter 1

1. Figure 2.2. Move Figure 2.2 to Chapter 1 and expand its eastern edge to include Segment 8 (a pre-designated UGA).

Chapter 2 Methods

2. Chapter 2. Page 8. Section 2.1 1st sentence. Add: "out to the middle of Sinclair inlet and adjacent to the shoreline jurisdictions of Bremerton and unincorporated Kitsap County"
3. Page 8. Section 2.1 Add to the last sentence a reference to the individual shoreline segments add: This includes eight segments on Sinclair Inlet and four segments along Blackjack Creek.
4. Page 9. Add an overlay of the 12 segments referred to in the report. This is a good place to present all 12 segments on a larger overall map (including Segment 8).
5. Page 11. Section 2.3 Add to the first sentence: 12 segments. This includes eight Sinclair Inlet segments and four Blackjack Creek segments. The eight segments along Sinclair Inlet include: seven..... and one segment, segment eight, that provides the pre-analysis of the shoreline.....Move your description of how these segments are determined as separate down to the bottom of the paragraph and begin your discussion about the four segments along Blackjack Creek. This clarifies that the total segments and what they represent.
6. Page 12 Last paragraph. 2nd sentence: remove "all" in the second sentence.

Chapter 3 Ecosystem Wide Processes

7. Page 13 Section 3.1. 2nd Paragraph 6th sentence: Break it up into two simple sentences, such as: Presently, most forest cover in Kitsap occurs within the Gorst Creek watershed. This area is protected, as it is a drinking water source for Bremerton.
8. Page 13. Paragraph 2- 7th Sentence: (Note: I would leave out the phrase about Williams 1975 report as it gets confusing).

9. Page 13. Last paragraph. 1st sentence insert “with” to read “Sinclair Inlet is a shallow, poorly flushing estuary with several miles of saltwater frontage. “
10. Page 14 Section 3.1.2. 7th sentence suggested rewording: “Although limited vegetation has been retained with the development of the central business district, significant natural vegetation remains throughout the Blackjack Creek corridor.”
11. Page 14 Section 3.1.2. - 8th sentence. Suggest simplifying the sentence by breaking it into two sentences: “This highly compact and dense urban development pattern along the waterfront continues today. It is recognized and encouraged as stated in the goals of the 1992 Shoreline Master Program (Port Orchard 1992b).”
12. Page 14. Section 3.1.2. 2nd paragraph. Last sentence. Add commas to separate “among the few urban corridors”.
13. Page 15. 3rd paragraph 2nd sentence: add commas to separate the “such as” phrase. : “ Alteration of bluffs, such as grading or vegetation removal, have interfered with the erosion processes that historically provided substrate and large woody debris to beaches and sand bars. This interference has resulted in loss of important marine nearshore habitat support by large woody debris, beaches and sand bars.
14. Page 15. Section 3.1.4 just a suggestion: you could break this long 3rd sentence into two simple sentences: “The topography of the Port Orchard shorelines is relatively steep. A comparison of today’s shoreline configuration with historical maps indicates that the amount of fill extended into the aquatic environment is much less than that commonly experienced in other Puget Sound communities.”
Question: do you have historical maps available for comparison? If so, you might want to include those as examples.
15. Page 16. 3rd paragraph 3. 2nd sentence: Phase one fill proceeded.....”
16. Page 16. 4th paragraph. 1st sentence: Add period after docks. For clarity, suggested rewording: “However, with decreased demand and rising costs for timber and fish products, resource industries became less viable. As a result, the City became a primarily residential “bedroom community” for many residents, who commuted daily to work in Seattle and nearby areas.”
17. Page 16 Section 3.2.2 2nd sentence. Suggested rewording: “The City has made it a priority to balance the growing commercial service needs with the increased residential environment; while”

Chapter 4 Watershed Context

18. Page 19. 2nd paragraph separate first sentence into two sentences: “...transpiration. However,.....”
19. Page 19. Section 4.1. Last paragraph. 1st sentence refers to a table below- what table?
20. Page 20. Either omit second and 3rd paragraphs, as these are just general information, or cite the source(s).
21. Page 20. Last paragraph. Add comma after Karcher Creek,
22. Page 20. Last paragraph: 3rd sentence. Suggested rewording to simplify the last sentence: “This increased sedimentation continues to be a navigation concern.”

Chapter 5. Sinclair Inlet/Puget Sound Shoreline

As you move into a segment-by-segment analysis, think about your reading audience and the purposes of the inventory, as a decision-making, permitting, planning and public education tool. Your readers are likely

going to be place-specific in their inquiry. Therefore, to combine all information relative to each segment in one location in the report helps the reader understand just what the report reflects about the shoreline of their particular focus.

Good use of Table 5.1 and very nice overview of physical, water quality, biological and cultural resources. Great information provided on land uses, zoning, transportation and public access. Given the types of disturbances described in the inventory, the segment-specific descriptions should also include the approximate length of shoreline, in each segment, that is armored and the percentage of shoreline, in each segment, presently with riparian vegetation. This will help the inventory create the required baseline to depict how the city can achieve no-net-loss with new development (See the Draft No Net Loss Indicators attached). This could be in a form similar to Table 5.1 with Shoreline Segments identified by name and linear measurements. To enhance this presentation of alterations and simplify the presentation of information for policy development, implementation and use at the project-level, Ecology suggests the following changes:

- 23. Include somewhere in the beginning of this section, a larger map showing all of the individual segments overlaid across the entire shoreline. This will make it more user-friendly as the reader moves through the document.
- 24. Try to bundle the present alterations to ecosystem processes, land uses, zoning, transportation and public access into descriptions of each of the segments, rather than separating them into separate segment-by-segment descriptions for each topic. Again, this will help the reader understand all the pieces for each segment of shoreline. The public access section is very well done through a segment-by-segment analysis of existing and potential access opportunities. However, again folding what you have prepared into the one segment-by-segment analysis (as suggested above) would make it a more useful document for policy-making, implementation and information purposes. (Note: This could be as easy as "cut and paste".)
- 25. On page 33, Segment 8 is not described for land uses. Even though this is a UGA, now regulated by unincorporated Kitsap County, the present land uses are still relevant to SMP development.
- 26. You could also include a Land Use Analysis Section that summarizes land use for each segment in table-form briefly touching upon land uses, anticipated land use changes, if any, and potential designations for shoreline management and whether they are consistent with the issues analysis and environmental conditions at the reach and basin scale (this should link to the table suggested in comments on Chapter 7 below). This will help the City in Task 2.3. The following example is based on the Port Orchard Inventory, using the structure provided in the City of Kent's recent land use analysis for their Green River Shorelines.

Segment and land use	Likely Changes in Land Use	Implications for Shoreline Management
1. Largely Commercial, Office and Industrial with some low density residential	No changes expected	Discuss what designation would be the most suitable given the uses and expected changes. Example: High Intensity to provide for existing commercial and industrial uses.
2. Greenbelt area. Least developed in the City	Urban Conservancy	Expand public access amenities, where feasible. Protect and restore ecological functions.

Chapter 6: Blackjack Creek:

- 27. Incorporate the input from Stephen Stanley’s attached PowerPoint on Ecosystem Wide Characterization – Blackjack Creek.
- 28. Once again, fold each element (i.e. physical environment, land use, zoning and transportation, and public access into each of the four segments. Only listing each segment once, rather than multiple layers of segment information.
- 29. Page 2 of the attached PowerPoint by Stephen Stanley provides key ecosystem functions in a table format that relates those processes to solutions, environment designations and recommended protection and restoration measures.

Chapter 7: Summaries and Shoreline Opportunity Areas

Section 7.1.1.1-8. Simplify the segment-by-segment analysis presented in this section. Although, it is excellent that the City has this detailed information, Ecology recommends for the purposes of SMP implementation, policy-making and public understanding, that the NAU, Shorezone ID, and drift cell numbers be omitted from the report. Although these numbers have meaning for identifying aspects of these shoreline segments, they do not necessarily have much meaning for the intended uses and users of this document. Ecology, therefore, recommends that the report rely on simple descriptions of the segments, segment conditions and recommended management actions. You have all that information documented in your references and appendices. Therefore, if someone needs to probe deeper into the background information, the report directs them to where they can access it. Other than that, there is no need to repeat those nearshore assessment ID’s in text of the document itself.

Again, see comment 28 above using Stephen Stanley’s table form. The segment numbers should be identified per the City’s Atlas Segments 1-8 for Sinclair and S1-4 for Blackjack Creek. For example: Ecosystem Issues pertinent to Segment 1:

- How have ecosystem processes been changed relative to those issues?
- What are the proposed solutions?
- What are the recommended actions, measures and environment designations in an effort to get to those solutions?

The following table is only intended as an example.

Segment	Altered Ecosystem Processes	Solution	Recommended Protection and restoration measures and environment designations
1	High Disturbance: 1) Armored shorelines separating shorelines from feeder bluffs and associated uplands; 2) Lack of shoreline riparian vegetation to protect water quality; 3) Roads parallel to the shoreline in shoreline jurisdiction; 4) Habitat impacts of overwater structures.	Enhance, conserve and restore processes	1) incentives to use alternative shoreline stabilization measures, if feasible; 2) incentives and requirements to plant native vegetation along shorelines, if feasible; 3) remove abandoned creosote pilings; require light transmitting and non-toxic materials in overwater structure standards. Designate as High Intensity as uses are not expected to change

References

- 1) Add a note just under the REFERENCES *(beginning on page 82) that this document contains four sets of citation references: 1) pages 82 – 85; 2) Appendix A: Nearshore Characterization & Analysis Methodology on page A.7; 3) Appendix E: Port Orchard 2003 Shoreline Resource Analysis and Inventory on pages 47-50; and 4) Appendix F: Port Orchard Inventory Data Source List on pages 1-3.

Appendices:

Appendices A-F are excellent. For Appendix C: Ecology recommends adding the 12 segments to the Shoreline Designation Atlas Overlay (page 1) and indicating the segment boundaries on the Shoreline Designation Atlas pages that follow. This will inform the reader of what segments they are viewing.

Ecology recognizes and appreciates the City's excellent efforts in creating this draft document. The inventory is a very important product, providing a basis for SMP development. It provides baseline information and a foundation, upon which the SMP will be developed. If you have any questions regarding any of these comments or the inventory process, in general, please feel free to contact me at 425-649-4309.

Nice work – job well done!

Sincerely,



Barbara Nightingale, Regional Shoreline Planner
Department of Ecology SEA Program - NWRO
425-649-4309

Enc: Draft Potential No Net Loss Indicators

SMP Handbook – Chapter 7 Shoreline Inventory and Characterization

Port Orchard Ecosystem Wide Freshwater Assessment (Blackjack Creek) – Stephen Stanley

Cc: Peter Skowlund

Geoff Tallent

Hugh Shipman

Stephen Stanley

Kathy Taylor

Patrick McGraner

Joe Burcar