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STATE OF WASHINGTON

DEPARTMENT OF FISH AND WILDLIFE

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December 13, 2006

Shorelines Team
Planning Services Department
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Shorelines Team:

The Washington Department of Fish and Wildlife (WDFW) received the request for comments from members of the Shoreline Technical Advisory Committee on the Draft Shoreline Inventory Project. WDFW reviewed the document and would like to provide the following comments for consideration during preparation of a final draft.

In reviewing the document, WDFW has noticed data gaps under the following sections:

Native Aquatic and Shoreline Dependent Wildlife

Priority Habitats and Wildlife Corridors

The Shorelines Inventory process is intended to identify what the Shoreline Master Program is ultimately in place to protect. Under the SMP amendment rules: WAC 173.26.201 are the rules for Inventory. Sections that most apply are highlighted.

(c) Inventory shoreline conditions. Gather and incorporate all pertinent and available information, existing inventory data and materials from state agencies, affected Indian tribes, watershed management planning, port districts and other appropriate sources. Ensure that, whenever possible, inventory methods and protocols are consistent with those of neighboring jurisdictions and state efforts. The department will provide, to the extent possible, services and resources for inventory work. Contact the department to

determine information sources and other relevant efforts. Map inventory information at an appropriate scale.

Local governments shall be prepared to demonstrate how the inventory information was used in preparing their local master program amendments.

Collection of additional inventory information is encouraged and should be coordinated with other watershed, regional, or statewide inventory and planning efforts in order to ensure consistent methods and data protocol as well as effective use of fiscal and human resources. Local governments should be prepared to demonstrate that they have coordinated with applicable interjurisdictional shoreline inventory and planning programs where they exist. Two or more local governments are encouraged to jointly conduct an inventory in order to increase the efficiency of data gathering and comprehensiveness of inventory information. Data from interjurisdictional, watershed, or regional inventories may be substituted for an inventory conducted by an individual jurisdiction, provided it meets the requirements of this section.

WDFW was directly involved with the PFC work that was conducted in Latah Creek with the Spokane County Conservation District. Specifically, WDFW correlated wildlife species use with the various habitat types identified along the creek. To the best of my knowledge, WDFW was not directly involved with this work along the reaches of the Spokane River within the City limits. This information is missing from this document. It is neither in the text, nor in the attached Appendices B or C. It appears that at this point the only data that was consulted is the WDFW Priority Habitats and Species Data, including Wildlife Heritage Data. The WDFW Priority Habitat and Species data is not a comprehensive list. It includes only those habitats that are critical and declining, and those species that are State listed, or candidates for listing. The Final Shorelines Inventory document must incorporate Best Available Science and identify a comprehensive list of species. Some of this information has already been compiled and should be cited. Generic lists of species, such as “native wildlife includes osprey, eagle, mink, beaver, deer and more”, weaken the scientific integrity of the document. Instead, consider tapping into scientific sources and documenting information.

A great source to start with for information regarding riparian habitat function and associated wildlife use is *Wildlife of Riparian Habitats*, J. Boone Kauffman, Matthew Mahrt, Laura A. Mahrt, and W. Daniel Edge. In addition WDFW in Region 1 Headquarters is more than willing to assist with filling data gaps with local knowledge.

The Wildlife Program biologists can easily put together comprehensive species lists for birds and wildlife species, while the Fish Program can assist with fish information, including fish density information. . Contact the Spokane County Conservation District to determine if there is additional data collected during the PFC work.

There has been a lot of focus on the construction of a whitewater park in the Spokane River. In reviewing the document WDFW noted that angling was not noted as an important recreational use in the river. Along with many other species of fish, the

Spokane River contains a healthy population rainbow trout, including strains of native redband trout. The section of river below Monroe Street bridge contains the healthiest population of redband trout in the river. Due to its native status, this population of fish is of statewide significance. Along with the protection of the state's fish and wildlife resources, the mandate of the WDFW is to provide and protect recreational opportunity. The excellent quality fish populations attract anglers to the entire river. Many anglers target the lower Spokane River. These anglers, many of them flyfishers, bring economic gain to the region. Many are local anglers, but others travel from around the state, or out of state to fish for these native trout. These anglers are important constituents of the Washington Department of Fish and Wildlife. In all of the efforts to restore vitality downtown and bring the City of Spokane to the river, the importance of the populations of fish in the river and important user groups must not be overlooked.

The proposed whitewater park downtown at the Sandifur bridge threatens the native redband population. The proposed channel wide structure will block upstream migration of fish and the ability for fish to access the critical spawning habitat is above this point.

The construction of the whitewater park as proposed will also impact the angler user group. This reach of the river is highly utilized by anglers and as WDFW pointed this out early on in the whitewater park process, and would like to reiterate this concern now. There is an apparent conflict of interest between a recreational water park and associated crowds of onlookers, and angling. Flyfishers often put in below Monroe Street and float the reach in pontoon boats. The type of whitewater park that is currently proposed would disrupt this use. There is most likely a beneficial way to construct a whitewater kayak park – one that protects fish populations, enhances and increases available macro-habitat, and provides an additional recreational benefit to the region.

WDFW agrees that the CMZ needs to be included in the SMPs. As the CMZ is the area that the river channel is likely to move to, shoreline protection should extend to these cover the habitat in these areas.

Thank you for consideration of these comments. The Washington Department of Fish and Wildlife looks forward to working with the City towards completion of the Final Shoreline Inventory Project and throughout the rewrite process of the Shoreline Master Program.

Sincerely,

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