

From: [Karen Walter](#)
To: [Jack Dodge](#)
Subject: RE: Notice of Application - Shoreline Permit, Stewart Road Improvements SHR20-001
Date: Monday, July 6, 2020 2:27:10 PM

Jack,

Thanks for the additional information for this project. As you have seen, we submitted comments to Sumner's SEPA documents for the road widening and bridge project. Many of these comments would also be applicable to the shoreline permit; therefore, we are going to submit them in response to the pending shoreline permit for the City of Pacific.

Please note that MITFD habitat program staff that previously worked with the City on initial bridge designs have been furloughed so the comments and questions that we send today should be viewed as initial comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources:

Missing waterbodies in the project area

The checklist only denotes the White River in the Surface Water responses; however, the plan set shows a wetland near the Manke site (Sheet RD-1 and RD-2) and there is a backwater or off channel feature along Butte Avenue where Muckleshoot employees and fishers have noted juvenile salmon use. I think this feature is shown in Exhibit A that you provided. There is clearly a waterbody/stream shown north of the roadway in the regulated shoreline area and beyond in the underlying aerial photo on this Exhibit. I think this feature may get backwatered by the White River and should have been included as part of the White River regulated shoreline as a result. This feature does not show up on any of the project drawings and needs to be included so an assessment of potential impacts and mitigation, if needed, can be done.

Bridge design and potential impacts to salmon/habitat and tribal fishing

The project plan set is missing the bridge design details, including the extent of piers in the OHWM and the 100 year floodplain. This important as MITFD staff reviewed initial designs back in 2016 including how the proposed bridge may connect to King County's Countyline levee setback and habitat restoration project. We need to see the proposed bridge designs to see how they compare and to assess potential impacts to salmon/their habitats and tribal fishing that occurs in the bridge area on the White River.

As part of the bridge design details, we also need the details about the proposed bridge and Stewart road roadway lighting. Artificial lighting can adversely affect salmon migration behaviors and increase their risk of predation.

Bridge construction

Bridge construction details will be needed so that we can assess potential impacts to tribal fishing activities and ways to reduce/minimize these impacts.

Stormwater outfalls

Any proposed stormwater outfall needs to be set back from the OHWM of the White River, including the erosion pad to dissipate energy. Native woody shrubs should be planted between the dissipater and the river to further dissipate stormwater flows and reduce impacts to margin habitats along the White River used by juvenile salmon.

Stormwater treatment

Stormwater should also be treated using enhanced treatment methods before discharged to the White River to reduce impacts to salmon.

Tree removals

Any native tree that is 4 inches in diameter or greater and within 200 feet of the White River should be placed back into the White River as partial mitigation for temporal losses to future wood recruitment.

No net loss evaluation

The project needs to evaluate potential impacts to regulated shoreline areas and buffers and provide a no net loss evaluation. From a quick review of the Habitat Management Plan submitted to Sumner, it appears to be incomplete with respect to the issues noted above. It should be rewritten to be more comprehensive or a separate critical areas report that includes wetlands/their buffers, the Butte Ave waterbody and White River and its buffers be developed that fully addresses potential project impacts and mitigation sequencing and mitigation measures for unavoidable impacts. This would include impacts from temporary work bridges needed to demo the existing bridge and build the new bridge.

We appreciate the opportunity to review this proposal and look forward to the City of Pacific's written responses and additional information to address these concerns. We will likely have additional comments, too.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

*Muckleshoot Indian Tribe Fisheries Division
Habitat Program
39015-A 172nd Ave SE
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253-876-3116*

From: Jack Dodge [mailto:jdodge@ci.pacific.wa.us]
Sent: Thursday, June 04, 2020 10:57 AM
To: Karen Walter
Subject: RE: Notice of Application - Shoreline Permit, Stewart Road Improvements SHR20-001

Hi Karen: Within Pacific, the permit is a Conditional Use Permit. Attached is a response to the CUP permit criteria under WAC 173-27-160 and the City of Pacific's shoreline designations (While the map says proposed, it was approved by DOE). SEPA will be done jointly with the City of Sumner with their White River Bridge replacement project on 8th Street. Due to the symbiotic nature of Pacific's Stewart Road widening project and the bridge replacement project, it was determined that the City of Sumner would be the lead SEPA agency for both projects. The Sumner SEPA file is PLN-2020-0036 as noted on the Notice of Application. The City of Sumner will be issuing the SEPA determination on this project. If you have any further questions, please let me know.

*Jack Dodge
Community Development Manager
City of Pacific
253-929-1107*

From: Karen Walter <KWalter@muckleshoot.nsn.us>
Sent: Thursday, June 4, 2020 10:14 AM
To: Jack Dodge <jdodge@ci.pacific.wa.us>
Subject: RE: Notice of Application - Shoreline Permit, Stewart Road Improvements SHR20-001

Jack,

Thanks for this notice. Is there additional project documents or information about this project available for

Attachment 10-2

our review? For example, how does the proposal comply with all of Pacific's Shoreline requirements? Usually applicants (even government agencies) provide a narrative that responds to each of the relevant shoreline program and code requirements.

Also, when did the City issue SEPA for this project? I can't find a copy in our files or the SEPA register. The last thing we got was for the section of Stewart Road from SR 167 to Valentine Avenue which also underwent NEPA review (categorical exemption) via WSDOT's Highways and Local Programs. That document clearly states that the Butte Ave-Valentine Road section would undergo its own environmental review.

We are also asking because we had commented on the SR 167 to Valentine Ave section and some of the City's responses deferred full answers for a later date (see attached email with outstanding comments and the LCE paperwork).

Please advise.

Karen Walter
Watersheds and Land Use Team Leader

*Muckleshoot Indian Tribe Fisheries Division
Habitat Program
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From: Jack Dodge [<mailto:jdodge@ci.pacific.wa.us>]

Sent: Thursday, June 04, 2020 9:46 AM

To: Adonais Clark; Anne-Marie Marshall-Dody; Austin Fearnow; Bill Sullivan; Chris Anderson (candersen@auburnwa.gov); Clare Flanagan; Dale Severson; Darren Groth; David Hill; DOE SEPA Unit; Erika Harris; Frank DiBiase; Gary Kriedt; Grant Timenantha; Gretchen Kaehler; Heather Jarvis; Jamey Taylor; Jeff Dixon; Jeff Payne; Jim Ishimaru; Jim Venters; John Graves; Karen Walter; Kelly Barnard (Kelly.Barnard@boeing.com); Larry Fisher; Maggie Gipson; Michael Gagliardo; Nathan Jones; Perry Weinberg; Puget Sound Clean Air Agency; Puget Sound Energy; Ramin Pazooki; Randy Sandin; Review Team; Robert Hubenthal; Rory Grindley; Russ Ladley; Ryan Windish (ryanw@sumnerwa.gov); SEPA Desk DFW; Steve Botteim; Suzanne Anderson; Thea Severn; Tim Osborne; Valerie Garza; VRFA; Wally Archuleta

Cc: Jack Dodge

Subject: Notice of Application - Shoreline Permit, Stewart Road Improvements SHR20-001

Hello Everyone: Attached is the Notice of Application for a Shoreline Substantial Development Permit for the Stewart Road Improvements in Pacific. If you have any questions, please contact me.

Jack

*Jack Dodge
Community Development Manager
City of Pacific
253-929-1107*

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Attachment 10-3

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