

Matrix of Proposed SMP Edits

Section	Change	Comment Summary/Staff Discussion	Source	Recommendation	PC Action
Chapter 4	Comment letter D6 requested several updates and edits to this Chapter. However this is a summary of the existing Shoreline Inventory and Characterization Report and updating this underlying document is not within the scope of this periodic update.	Staff recommends the following clarifying comments but these should not imply that the report itself has been updated.	Public - D6 p.3-4		No action required
Chapter 4	While the report has been finalized, the City continues to utilize the most recent information available, such as the recently updated 9/15/2017 FEMA Revised Preliminary Digital Flood Insurance Rate Maps (DFIRM) , which were issued after the completion of the Inventory and Characterization report.	Commenter asked what is the date of the referenced DFIRM maps on this page?	Public - D6 p.3	Staff - Add new language	No change to Public Review Draft
Chapter 4.1	Aside from The Tukwila 205 certified levee on the left bank of the river in the Urban Center is not certified and areas protected by this levee have been designated as "secluded" and regulated as outside of the 100-year Special Flood Hazard on the proposed 9/15/2017 FEMA Revised Preliminary Digital Flood Insurance Rate Maps (DFIRM). Other levees in the City also do not meet COE standards and are mapped as floodplain. These include portions of the newly annexed Tukwila South area and levees along the right bank of the river. Current development proposals in Tukwila South include the relocation of the cross-valley levee and reconstruction of the non-certified levees to meet COE standards. The permitting for this work is on-going.	Commenter asks about the statements on the inadequacy of the Tukwila South levee and relocation of the cross-valley levee and permitting to address these issues. Staff proposes the clarification shown.	Public - D6 p.3	Staff - Change as shown	Change as shown
Chapter 4.2	The entire length of the Green/Duwamish River within the City of Tukwila has been declared "critical habitat" for Chinook salmon, Steelhead trout and bull trout. Both These species are listed as threatened under the Federal Endangered Species Act.	Commenter notes that Steelhead trout are also listed under the Endangered Species Act and are found in the Green/Duwamish River.	Public - D6 p.3	Staff - Change as shown	Change as shown
Chapter 4.2	Changes to hydrology are the result of modified flow regime due to dam construction, diversion, and urban development. River management, piping of streams including the use of tide-gates, pumped storm discharges, and levees have reduced the connection between the rivers and their floodplains, changing the spatial extent of habitats, and increasing the potential for negative water quality impacts. Disturbances to the channel banks have resulted in areas that are dominated by non-native invasive species and generally devoid of sufficient riparian vegetation. Wood, in the form of riparian trees and in-channel wood, is generally lacking throughout the system, which negatively impacts riparian and aquatic habitats as well as river temperatures that periodically exceed state standards and create lethal and sublethal conditions for adult salmon.	Commenter states that this section should be modified to note that lack of trees affects water temperatures which exceed state standards and create lethal and sublethal conditions for adult salmon.	Public - D6 p.3	Staff - Change as shown	Change as shown

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Chapter 4.3	In general, these changes have reduced the amount of water flowing through the Green/Duwamish River to about one third of historic conditions and eliminated significant fish habitat.	Commenter notes that the rerouting of the Cedar and White Rivers eliminated the Black River, lowered the flow, and reduced the source of wood and sediment. Staff suggests the proposed edit.	Public - D6 p.3	Staff - Change as shown	Change to read "to approximately one third of historic conditions and have impacted fish habitat. "
Chapter 4.4	Discussion of shoreline planning for the Green River in Tukwila must acknowledge the fact that, in light of the existing system of levees (including the federally certified authorized "205" levees) and revetments, the City cannot act alone. There are a variety of regulatory jurisdictions outside of the City with different responsibilities for maintenance and , management and regulating of the levee system, including the U.S. Army Corps of Engineers (the Corps), the Federal Emergency Management Agency (FEMA), the King County River and Floodplain Management Unit (acting as part of the Green River Flood Control Zone District) Flood Control District (KCFCD) , and private property owners. The City of Tukwila Public Works Department has overall responsibility for maintenance of all levees, including the federally authorized certified Tukwila 205 Levee, which extends from about the I-405 crossing to the south city limits approximately S. 196th Street . The actual maintenance work on this public levees is performed by the KCFCD contracted by the City to King County .	Commenter asked if all of the levees in Tukwila are certified and stated that the references to the Green River Flood Control District should be changed to King County.	Public - D6 p.3	Staff - Change as shown	Change as shown
Chapter 4.5	Issues of concern today are focused on uncertainties about the ability of reconstructing existing levees and revetments to protect existing development from flood hazards, an effort that will take place over a number of years in coordination with the King County Flood Control Zone District, King County and state and federal agencies . There are many opportunities for conservation and restoration actions in the City to restore or replace habitat while managing natural hazard areas.	Commenter states that there is no mention of the Lower Green River Flood Hazard Management and Corridor Plan that is being developed. As that plan is still in the development process Staff suggests the language in red.	Public - D6 p.4	Staff - Change as shown	Change as shown
Chapter 5	Comment letter D6 requested several updates and edits to this Chapter. However this is a summary of the existing Shoreline Restoration Plan and updating this underlying document is not within the scope of this periodic update.	Staff recommends the following clarifying comments but these should not imply that the Plan itself has been updated.	Public - D6 p.4		No action required
Chapter 5.3	Tukwila has worked within the larger Green/Duwamish River Ecosystem restoration project to acquire or donate properties for restoration that are either currently functioning (Cecil B. Moses Park, Codiga Farm), or have the potential for restoration (North Winds Weir, Duwamish Gardens).	Commenter states that the proposed restoration projects on this page need updating.	Public - D6 p.4		Change as shown

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Chapter 5.4	· Removing fish barriers where tributary streams discharge to the river. This action would remove flap gates and install fish-friendly flap gates at the mouths of Tukwila's three major streams (Gilliam, Southgate and Riverton) and possibly restore habitat area at these locations in the shoreline jurisdiction. <u>Many fish barriers on WSDOT roadways are required to be replaced by 2030 per the Federal Court injunction under U.S. v. Washington.</u>	While the WSDOT decision was subsequent to the Plan it does reflect the current regulatory environment.	Public - D6 p.4	Staff - Add new language	Change as shown
Chapter 7.2	· The <u>entire Green/Duwamish river including its tributaries</u> is a critical resource for <u>federally protected</u> Muckleshoot Indian Tribe fishing.	Commenter states that the information regarding Muckleshoot fishing needs to be changed.	Public - D6 p.4	Staff - Add new language	Change as shown
Chapter 7.4	The Director may reduce the standard buffer on a case-by-case basis by up to 50% upon construction of the following cross section: reslope bank from toe to be no steeper than 2.5:1 using bioengineering techniques; Minimum 20' buffer landward from top of bank; Bank and remaining buffer to be planted with native species with high habitat value.	This is a voluntary incentive for property owners to lay their non-levee riverbank back to a stable angle and plant with native species. The change to a slightly flatter slope would improve planting success and improve slope stability.	Staff	PC - Make change D4 p.3 - No change	Retain current 2.5:1 slope in Urban Conservancy
Chapter 7.5	Commenter: The City needs to explain why 100' buffer is sufficient to provide the suite of functions fully discussed in WDFW and NOAA rationale for buffer widths. Please explain how the proposed shoreline buffer widths considered the recommendations from the Green River TMDL River improvement plan (WDOE, 2011).	Commenter says that the statement regarding buffer widths for different riparian functions is incorrect and not supported by various scientific studies and literature. Staff responds that changing shoreline jurisdiction, buffer widths or environment designations is not within the scope of this periodic update.	Public - D6 p.4	Staff - No change	No change to Public Review Draft
Chapter 7.5, 7.	Do not require that new or repaired levees meet the "Briscoe" profile. Use it as an example but allow flexibility to address site conditions as long as overall 2.5:1 slope is achieved.	The most recent COE levee repairs did not use the Briscoe profile but meet flood prevention and habitat goals.	Staff	PC - Make change	No change to Public Review Draft
Chapter 7.5	Commenter: The levee designs referenced here did not consider the extent of trees needed for water temperature compliance nor the extent of rearing habitat created under flow conditions when juvenile salmon would be using these areas.	Staff is proposing greater flexibility in levee design to allow for site specific solutions.	Public - D6 p.5	Staff - No additional changes	No change to Public Review Draft
Chapter 7.7	Allow greater flexibility in the use of flood walls to lessen impacts on adjacent property owners, avoid encroachment on a railroad easement or provide area for habitat restoration.	This flexibility may increase the feasibility of reconstructing levees to protect against 500 year floods while limiting the additional width and property acquisition required.	Staff	PC - Make change	No change to Public Review Draft
Chapter 7.7	Commenter: Floodwalls, if allowed, should be reviewed with Corps to ensure they meet Corps requirements and avoid the Kent Briscoe Site 1 outcomes.	Staff is proposing greater flexibility in levee design to allow for site specific solutions that would be reviewed by all agencies with jurisdiction.	Public - D6 p.5	Staff - No additional changes	No change to Public Review Draft
Chapter 10	A second area where improvement is needed in public access relates to boat launches for small hand launched boats. Several potential sites have been identified in the Tukwila Parks Department Capital Improvement Program to address this need at City-owned sites. <u>A comprehensive regional inventory of public access points to the River should be completed to identify gaps and opportunities.</u>	Commenter encourages the city to undertake a comprehensive inventory of public access points within shoreline jurisdiction and establish standards for appropriate levels of access, especially for more impactful types of access like boat ramps. Staff suggests the language in red.	Public - D8 p.2	Staff - Add new language	Change as shown