

Responses to DEIS Comments

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Chapter 10—Responses to DEIS Comments

Commenter	Date Received	Comments	Responses
<p>Commenter #1 Duwamish Tribal Historic Preservation, Duwamish Tribe 4705 W. Marginal Way SW, Seattle, WA 98106 (206) 431-1582 www.duwamishtribe.org</p>	<p>9/14/2024</p>	<p>Thank you for the opportunity to comment on the Shoreline 2044 - Comprehensive Plan - Picture It! Plan It! Build It! to create a new plan that guides growth in Shoreline for the next 20 years and to accommodate growth targets allocated by King County in line with Washington State's GMA (Growth Management Act). Shoreline (the City) and its environs are an area that the Duwamish Tribe considers culturally significant, and near its many waterways and marshes, has a High probability of having unknown archaeological deposits. Shoreline was one of our usual and accustomed places that we have inhabited since time immemorial through today. We note that there are at least 4 historical and ancestral Duwamish place names, Boeing Creek and its headwaters, the headwaters and upper course of McAleer Creek, Echo Lake, Ronald Bog Park and Lake Balinger all near or within the current bounds of the City of Shoreline. These bodies of waters created pathways and resources for our Tribe as well as our Sister Tribes, the Snoqualmie, sduk^walbix^w, the Snohomish, sduhubš and the Suquamish, x^wsaq̓ ^wəbš.</p> <p>The Duwamish Tribe supports Shoreline’s 2044 Comprehensive Plan and commends the City for including discussions on environment, housing choices, transit access, open space protection and sustainability. We also commend the City for their efforts in community engagement to increase participation in the Plan that includes historically underrepresented people from the BIPOC community as well as the Duwamish Tribe. The Tribe appreciates the continued communication on development projects within the City of Shoreline. Recognizing the many voices that have contributed to Shoreline, is a positive way for the City to invite economic growth, create a welcoming destination place for visitors, to become a leader among the surrounding central Puget Sound, and to uplift its citizens by fostering a sense of community.</p> <p>Our comments will focus primarily on land use, the natural environment, and cultural resources after a narrative of the Duwamish Tribe’s continued existence.</p>	<p>Thank you for your comments and for expressing support for the 2044 Comprehensive Plan—Picture It! Plan It! Build It! Following are specific responses to your comments.</p> <p>Response 1A: The City of Shoreline will follow requirements related to archaeological and cultural resources preservation in alignment with any applicable federally funded or federally related permitting. These requirements include notification of the Duwamish Tribe when site archaeology is proposed. In addition, State law requires an <u>Inadvertent Discovery Plan</u> (IDP) in the event of an unanticipated discovery of human remains, historic or prehistoric resources. A permit condition will be placed on a permit stating: “State law requires an Inadvertent Discovery Plan (IDP) in the event of an unanticipated discovery of human remains, historic or prehistoric resources. This plan is required at the project site at all times.”</p>

		<p>The Duwamish Tribe originated along the shores of the Black and Duwamish Rivers near the modern-day cities of Renton, Tukwila and Seattle. This location is the home of our ancestral village and our people, dxʷdəwʔabš, The People of the Inside. The Black and Duwamish Rivers hold numerous Duwamish ancestral and historical place names including the location of our creation story at North Wind’s Weir.</p> <p>The Duwamish and our Sister Tribes had villages around our major waterways and lakes. We have been here since at least the end of the Vashon Stade of the Fraser Glaciation about 10 to 12 thousand years ago. Like other tribes around Lake Washington (ḡačuʔ) and Puget Sound, ḡʷəlč, we managed and respected our land, rivers and resources that held abundant diversity in floral and fauna. Our longhouses were many and populated the shores of the Duwamish River, Puget Sound, Shilshoe, Lake Washington, the Sammamish River, Lake Sammamish, Issaquah Creek and the Cedar River. One of our old village sites, čətčal, was at the mouth of McAleer Creek, sʔacusucid, along the shore of Lake Washington belonging to the ḡačuʔabš or Lake People, a band of the Duwamish. McAleer Creek was also a pathway for many tribes to take from the lake to the upland wetlands for hunting and gathering resources at places like Lake Ballinger, S'a'tsu, and across to the shores of Puget Sound.</p> <p>After European contact, the land we once knew was artificially divided and most of our people were forced to leave our ancestral lands. At the turn of the 20th century, our last traditional longhouses and gathering places (potlatch homes) were burned and the land regraded to make a port in downtown Seattle, and the Duwamish River armored and straightened to create a waterway for industrial traffic. In addition, the Montlake Cut was created to make ship passage from Shilshoe Bay via the newly created Ballard (Hiram M. Chittenden) Locks into Lake Washington. The cut and waterways through Lake Union were never a permanent passageway during our ancestors’ time. It was a seasonal place to put our canoes as well as a burial place for our ancestors. These changes effectively cut us off from our access to water, our food sources, transportation and trade, and our way of life by lowering Lake Washington and drying up the Black River, a river which helped mitigate seasonal tides coming up from Elliott Bay through the Duwamish River. The Duwamish Tribe and our sister Tribes have experienced the same adverse effects of climate change on our ancestral lands many years before the documentation of global warming. Our Tribe</p>	<p>Response 1B: The City will continue to actively engage the community in planning and projects, including seeking participation and providing outreach to the Duwamish Tribe.</p> <p>Response 1C: The City’s Critical Areas Ordinance and provisions protecting critical areas in the Shoreline Municipal Code (https://www.codepublishing.com/WA/Shoreline/html/Shoreline20/Shoreline2080.html) require enhancement with native vegetation along stream corridors and in wetland areas as part of project permitting. In addition, the City sponsors a variety of programs that encourage environmental protection and enhancement and assessment, monitoring, and expanding the citywide tree canopy. In 2023, Shoreline completed an Urban Tree Canopy Assessment and adopted its Urban Forest Strategic Plan, which can be found here: https://www.shorelinewa.gov/government/departments/parks-recreation-cultural-services/projects-and-plans/urban-forest-strategic-plan</p>
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		<p>of Thornton, McAleer and places proximal to Lyon Creeks. We ask that the City continue to inform the Tribe of development projects and archaeological surveys as growth continues for Shoreline. See Response 1E.</p> <ul style="list-style-type: none"> • The Duwamish Tribe supports the many modes of transportation the City has outlined in the Plan. The Duwamish were the first peoples to provide transportation to the European settlers and we understand that transportation is important to the economy and for social and cultural gatherings. We support the mobility hubs that provide alternatives for single use automobile trips. See Response 1F. • The Duwamish Tribe supports the City’s housing policies. We are also encouraged by the City to allow clustering of residential units to promote low impact on the environment and preserve open spaces. Our ancestors understood this concept and clustered their villages and houses along waterways allowing for resources inland and on the water. See Response 1G. <p>The Duwamish Tribe also has some additional remarks regarding Shoreline’s environment.</p> <ul style="list-style-type: none"> • The Duwamish Tribe strongly recommends the ban of harmful or toxic fertilizers and insecticides to further increase water quality for fish, wildlife, native birds and pollinators and humans. Fertilizers increase nitrate pollution and soil acidification leading to dead zones through water run-off. See Response 1H. • For aesthetics and light pollution, the Duwamish Tribe would request that the City provide responsible outdoor lighting as outlined in Dark Sky International Protecting the night skies for present and future generations. The night sky was important to the Duwamish and other tribes and allowed us to understand and verify our seasonal calendars. Darkened skies were also favorable conditions to practice traditional life pathways. See Response 1I. • Also, for aesthetics we would encourage the City to construct buildings including housing that reflect the Coast Salish design of 	<p>https://www.shorelinewa.gov/our-city/environment.</p> <p>The City will continue to inform the Duwamish Tribe of development projects and archaeological surveys as growth continues for Shoreline as is our typical practice.</p> <p>Response 1F: Thank you for your support of the multimodal transportation plan. The City will continue to work to encourage less vehicle miles traveled in single person occupied automobiles.</p> <p>Response 1G: Thank you for your support of the City’s housing policies and the City’s allowance for clustering of residential units.</p> <p>Response 1H: Surface water run-off is stringently protected through federal, Washington State, and City of Shoreline water quality provisions, including permitting requirements related to the National Pollutant Discharge Elimination System (NPDES).</p> <p>Response 1I: Shoreline regulates lighting by requiring all light sources, such as a lamp or bulb, shall be shielded within a fixture, and fixtures</p>
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		<p>our ancestors - for reference view the web pages for the Duwamish Longhouse and Cultural Center, the Intellectual House on the University of Washington campus or a similar design like The Hanger in Kenmore. The designs were not only functional and adapted to our climate conditions, but also aesthetically pleasing. See Response 1J.</p> <ul style="list-style-type: none"> • We also strongly recommend that mature native trees in and around development projects are evaluated culturally. Mature trees can be of profound cultural significance to the Duwamish Tribe and other Tribes and provide innumerable benefits for people, climate, and wildlife. If a tree is suspected to be culturally modified, the Duwamish Tribe would like to be notified and would like the opportunity to come to the site to ensure its protection. See Response 1K. • The Tribe would like to see wildlife protected during times of migration. Oftentimes waterfowl and mammals cross major urban roadways at their lives' expense and contribute to vehicle damage. • The Duwamish Tribe would also like to have the opportunity to be involved in interpretive signage within the City. The Tribe is working to restore the place names along the Duwamish River and to reintroduce our native language. We would like to see this trend continue in Shoreline. See Response 1L. <p>Lastly the Duwamish Tribe wishes the City of Shoreline success in adopting its Comprehensive Plan. We hope it can be a vibrant place for citizens, visitors and its ancestral people. We hope that The Tribe can be a community partner with the City. We would also like to extend to you an invitation to meet with the Tribe at our Longhouse to discuss the comprehensive plan or to discuss other topics at any time. See Response 1M.</p>	<p>shall be located, aimed or shielded to prevent direct light trespassing across property lines.</p> <p>Response 1J: Thank you for this comment. New design standards will be incorporated into the Shoreline Development Code as part of the Comprehensive Plan update.</p> <p>Response 1K: In 2023, Shoreline completed an Urban Tree Canopy Assessment and adopted its Urban Forest Strategic Plan, which can be found here: https://www.shorelinewa.gov/government/departments/parks-recreation-cultural-services/projects-and-plans/urban-forest-strategic-plan</p> <p>Response 1L: Comment noted. The City will consider opportunities to collaborate on signage for upcoming parks and trails projects.</p> <p>Response 1M: Thank you again for your comments. We are honored by your invitation to the City to meet with the Tribe at your Longhouse to discuss the comprehensive plan and other topics.</p>
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<p>Commenter #2 Patrick Ducey plducey@gmail.com 19502 14th Avenue NE (206) 794-1048</p>	<p>10/16/2024</p>	<p>Maps used in the Comprehensive Plan continue to show errors.</p> <p>On Figure 7.6, Existing Sidewalks, there is a pathway indicated between 14th Ave and 15th Ave NE on 195th street, This city right-of-way is fenced off, is overgrown with blackberries, and is not actually a pathway. There is no through access. In Table 7-10, it is actually indicated as an unopened right-of-way. Does anybody in your office actually read the Plan? See Response 2B:</p> <p>On Figure 7.6, Existing Sidewalks, there is a pathway indicated between 10th Ave and 11th Ave NE on 195th street. This is an extremely steep and muddy slope that is quite treacherous. I don't know how the City can safely call this a pathway. What is the city's liability if someone gets hurt on this pathway? See Response 2B:</p> <p>On Figure 7.6, Existing Sidewalks, there is a pathway indicated between 12th Ave and 15th Ave NE on 200th street. While this pathway exists, the map shows a connection from 12th to 15th, This pathway terminates at McAleer creek. There is no bridge, and it's too wide to jump. The bottom of 200 court is completely covered in blackberries, there is no way through, even if you waded across the creek. See Response 2B:</p> <p>Figure 7.8, 2021 Metro Transit. It's 2024, the routes have been updated, Light Rail service has begun, maps are available of updated routes. Maybe it's time to update the Comp Plan. Isn't that what this Comp Plan review is about? See Response 2C:</p> <p>Figure 7.16, Bicycle plan. A ground level crossing of 15th Ave NE at 195th would be a dangerous intersection. There is a reason that 195th between 14th and 15th is blocked off. Why don't you come out and actually look at the intersection, and maybe plan for a safer crossing? I would be happy to meet with you and show you some of the issues. See Response 2D:</p> <p>Figure 7.17, Transit Map. Same comment as on Fig 7.8. Click copy paste from old data. Aren't you supposed to be updating the plan to 2024? See Response 2E:</p>	<p>Response 2A: Your comments are acknowledged and pertain to maps contained within the Comprehensive Plan, as well as the supporting Draft Environmental Impact Statement.</p> <p>Response 2B: Map has been updated in the FEIS.</p> <p>Response 2C: The King County Metro Transit network map has been updated in the FEIS to show the 2024 network map. This map is updated regularly by King County Metro and cannot always be accurately reflected in adopted documents.</p> <p>Response 2D: Figure 7.16 shows a network of future conditions. Individual intersection needs would be identified during the planning of a specific project.</p> <p>Response 2E: Figure 7.17 shows a network of planned future conditions which remain the same as the ones adopted in 2022 Transportation Element.</p>
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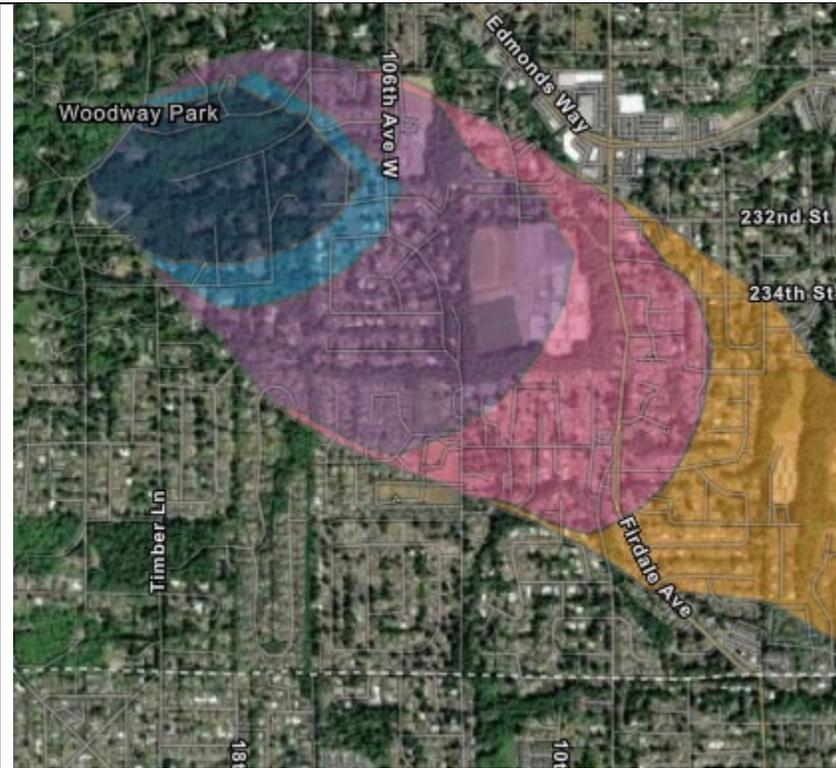
		<p>I have commented on some of these errors previously, and they continue to show up on the Comp Plan. Is there any review of citizen comments, or do you just ignore public comments and continue to publish wrong information? Does anyone actually check these maps? Does anybody actually make a site visit, or do you use Google maps and just phone it in?</p> <p>See Response 2A.</p>	
<p>Commenter #2 Patrick Ducey plducey@gmail.com 19502 14th Avenue NE (206) 794-1048 (second correspondence)</p>		<p>On 7/25/23, my property was designated to be in a potential landslide area, a potential flood area and a potential liquefaction area. Why doesn't Figure 6.1 show these potential seismic hazard areas? Why don't you use the soils maps from the City of Shoreline Hazard Mitigation Plan (figure 4.9 on page 4-27 or figure 4-12 on page 4-30)? Note, the Hazard Mitigation Plan I am able to access is in draft form and was published in 2004. I can't find an updated version.</p> <p>Figure 6.3 is missing. Does anybody review these documents prior to releasing them?</p> <p>See Response 2B.</p>	<p>Response 2B: City GIS data indicates the property has a moderate to high-risk landslide hazard are on the western portion of the lot which is reflected in figure 6.1. Maps showing seismic and liquefaction hazards have been added to the FEIS. Additional mapping and information related to seismic hazards and preparedness is available online at: https://www.shorelinewa.gov/services/emergency-services/emergency-management/hazards-in-shoreline/earthquake Figure 6.3 showing tree canopy mapping for Shoreline has been added to the FEIS in Chapter 6.</p>

<p>Commenter #2 Patrick Ducey plducey@gmail.com 19502 14th Avenue NE (206) 794-1048 (third correspondence)</p>		<p>Figure 8.2, City Owned Facilities indicates a pool next to the Spartan Gym. That pool was demolished in 2020.</p> <p>On Table 8.2, School District Facilities, why is the Shoreline Center listed twice? Does the Edwin Pratt Early Learning Center have an address.</p> <p>See Response 2C.</p>	<p>Response 2C: The label for Shoreline Pool has been removed from Figure 8.2. The second listing of the Shoreline Center has been removed from Table 8.2. The Edwin Pratt Early Learning Center address is: 1900 N 170th St, Shoreline, WA 98133, and this has been added to Table 8.2.</p>
<p>Commenter #3 Bob Danson, General Manager, Olympic View Water and Sewer District 8128 228th Street SW Edmonds, WA 98026-8449 bobd@ovwater.com (425) 774-7769</p>	<p>10/25/2024</p>	<p>Thank you for bringing the Draft Environmental Impact Statement (DEIS) for the 2024 Comprehensive Plan to our attention. After reviewing the document, we appreciate that it acknowledges Olympic View’s identification of a Critical Aquifer Recharge Area (CARA) buffer crossing into Shoreline. However, we did notice the statement that Shoreline does not have any CARAs, which raises major concerns for us.</p> <p>We respectfully request that the final version of the Comprehensive Plan more clearly state the presence of the CARA within Shoreline, as defined by Olympic View using Best Available Science, and that appropriate CARA protections be put in place as soon as possible. We believe it’s important to consult with Olympic View on any development proposed in the CARA to ensure that critical groundwater resources are protected. If additional analysis is required by the City, we hope it will not delay the necessary protections based on the current Best Available Science that can be found at this link https://olympicviewwater.com/wp-content/uploads/2023/04/2023-watershed-protection-plan.pdf.</p> <p>Thank you again for notifying us about this. We look forward to submitting more detailed comments and continuing the conversation to ensure this important resource is properly safeguarded.</p>	<p>Response 3A: As noted in the comment letter from Deborah Johnson, Department of Health (Commenter #4), below, while it is accurate that Shoreline does not have any currently designated critical aquifer recharge areas (CARAS) per SMC 20.80.430 (reflecting work adopted in 2015), the City does intend to update its Critical Areas Ordinance and corresponding provisions in the Shoreline Municipal Code in 2025. The City acknowledges that while a specific wellhead protection area (WHPA) does not exist in Shoreline, mapping provided by the Olympic View Water and Sewer District shows a buffer zone for the Deer Creek Springs Wellhead extending into the city limits of Shoreline. City of Edmonds recognizes this WHPA as a CARA. As part of the 2025</p>

			updates to the City’s critical areas provisions, the City will evaluate the area of the CARA and WHPA within Shoreline city limits and make updates to the critical areas code as needed to comply with the Growth Management Act.
<p>Commenter #3 Bob Danson, General Manager, Olympic View Water and Sewer District 8128 228th Street SW Edmonds, WA 98026-8449 bobd@ovwater.com (425) 774-7769</p>		<p>I am writing on behalf of the Olympic View Water & Sewer District to formally comment on the City of Shoreline’s 2024 Comprehensive Plan Draft Environmental Impact Statement (DEIS). While we appreciate the acknowledgment of Olympic View’s identification of a Critical Aquifer Recharge Area (CARA) buffer crossing into Shoreline, we strongly oppose the DEIS statement that "Shoreline does not have any CARAs."</p> <p>In 2023, Shoreline was informed and invited to comment on the update to Olympic View’s Watershed Protection Plan. The City made no comments, which implied Shoreline’s acceptance that the plan represented the Best Available Science (BAS). Additionally, in our ongoing communication with Shoreline, Olympic View provided a list of affected properties with a request for protections be added to these areas, and to inform Olympic View of any proposed developments within them. This communication has ensured that Shoreline is fully aware of the Wellhead Protection Area, which by definition should be designated as a CARA.</p> <p>The Wellhead Protection Area (WHPA) is clearly defined in our Watershed Protection Plan, based on BAS, and recognized by the Washington State Department of Health. The lack of full recognition of the CARA in the DEIS raises significant concerns regarding water protection and future development.</p> <p>The hydrologic modeling used in our Watershed Protection Plan is a delineation method recognized and encouraged by the Department of Health to identify Wellhead Protection Areas (WHPAs). Through this modeling, buffer areas are included in WHPAs when needed to protect vulnerable drinking water aquifers. Additionally, last year, the Department of Commerce broadened the definition of WHPAs in WAC 365-190-030(23) to include buffer zones when identified by the water system, defining</p>	<p>Response 3B: Comment acknowledged – also, please see Response 3A, above.</p>

		<p>WHPAs as “protective areas associated with public drinking water sources established by water systems and approved or assigned by the state department of health.”</p> <p>We respectfully request that the final version of the Comprehensive Plan clearly state the presence of the CARA within Shoreline, defined by Olympic View, and that CARA protections be put in place promptly. This includes consulting with Olympic View on any development proposed in the CARA to ensure that critical groundwater resources are protected. If additional analysis is necessary, it should not delay the implementation of protections based on the current BAS.</p> <p>We look forward to working with the City of Shoreline to ensure that this important resource is properly protected.</p> <p>See Responses 3A and 3B.</p>	
<p>Commenter #4 Deborah Johnson Wellhead Protection Program Coordinator Office of Drinking Water Environmental Public Health Division deborah.johnson@doh.wa.gov doh.wa.gov 253-433-4054</p>	<p>10/28/2024</p>	<p>Good afternoon,</p> <p>Olympic View Water & Sewer has forwarded last week’s public meeting notice relating to your draft comp plan update & associated DEIS. These comments expand on the District’s input to the project & its concerns about the DEIS. We will additionally be reviewing the draft GMA work under 60-day notice (RCW 36.70.106) & may provide separate comments at a later time.</p> <p>I believe the section Olympic View is particularly concerned with is found in Chapter 6 of the DEIS, p. 6-5:</p> <p>“Shoreline does not have any critical aquifer recharge areas (CARAs) within the city limits. Olympic View Water and Sewer District has identified a small area of the buffer zone associated with the Deer Creek Springs Wellhead as being located in Shoreline. A more thorough analysis of geologic, topographic, and subsurface conditions in the area of the Deer Creek Springs Wellhead buffer zone extending into Shoreline is needed to determine if additional protections within the wellhead buffer zone would be needed.”</p>	<p>Response 4A: Thank you for reaching out to the City of Shoreline on this matter. We would like to confirm the City does intend to update its Critical Areas Ordinance and corresponding provisions in the Shoreline Municipal Code in 2025. The City acknowledges that while a specific wellhead protection area (WHPA) currently does not exist in Shoreline, mapping provided by the Olympic View Water and Sewer District shows a buffer zone for the Deer Creek Springs Wellhead extending into the city limits of Shoreline. City of Edmonds recognizes this WHPA as a critical aquifer recharge area (CARA). As part of the 2025 updates to the City’s critical areas provisions, the</p>

	<p>It is accurate that Shoreline does not have any <u>currently designated</u> critical aquifer recharge areas (CARAs), per SMC 20.80.430 which reflects on work adopted in 2015.</p> <p>As I understand it, at issue here is whether the small portion of the identified buffer that overlays Shoreline’s corporate limits “counts” as a wellhead protection area (WHPA), which would then constitute a CARA. Separate from but related to GMA planning, WHPAs are a required element of purveyors’ water system plans (WAC 246-290-100 & -135). For the purposes of protecting CARAs under GMA, WHPAs are defined as “protective areas associated with public drinking water sources established by water systems and approved or assigned by the state department of health” (WAC 365-190-030). Olympic View’s source water protection program (entitled <i>2018 Watershed Protection Plan</i>), including delineation of its WHPAs, was submitted as a standalone element of its previously approved water system plan update. The final plan was approved by the District’s Board in June 2019 & by DOH in October 2019. The Deer Creek Springs WHPA, including the buffer, is depicted in Figure 7 of the approved plan (p. 142); the buffer zone in question is a portion of Olympic View’s delineated WHPA.</p> <p>(scroll down; continued below maps)</p>	<p>City evaluate the area of the ARA and WHPA within Shoreline city limits and make updates to the critical areas code as needed to comply with the Growth Management Act.</p> <p>We will coordinate with the Olympic View Water and Sewer District to obtain and review their modelling and mapping of the wellhead protection zone and confirm these conditions for application and treatment within our City’s code as needed.</p>
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		<p>Source: https://experience.arcgis.com/experience/9dc3fd45206d450f828ebd7ed9cdf7be</p> <p>This may result from a misunderstanding about the process used to identify WHPAs, or confusion because WHPAs in themselves represent buffers. A WHPA developed using a calculated fixed radius (CFR) method results in four “times of travel” (TOTs) outside of the well head. These appear on a map as concentric circles or a “bull’s eye” type image. The overall diameter & intervals will vary depending on the individual well’s operating characteristics, which are used in a math formula that results in the intervals. Theoretically, contaminants in a given area can be expected to travel in ground water for X amount of time before reaching the well. The TOTs include 6 months and 1, 5, and 10 years. There is no outlying buffer zone with the CFR method.</p> <p>Sometimes, the term “zone of contribution” is used synonymously with a WHPA, but the CFR method doesn’t really capture the contribution zone because it doesn’t consider where groundwater is moving. Although the CFR method is very common & is the most frequently used approach statewide, we have been encouraging systems to improve their WHPAs by stepping up to modeling as Olympic View has done. It isn’t unusual for computer modeling to identify an additional buffer zone past the ten-year TOT, because the approach does a better job of identifying a more linear zone of contribution—the “tail of the comet” seen in the Deer Creek Springs WHPA that overlaps Shoreline’s corporate boundary. Honing in on their zones of contribution in turn enables systems to more accurately identify potential contaminant sources, another piece of their required source water protection work. Here is another example of WHPA modeling in a Washington community that includes a buffer area beyond the 10-year TOT.</p> <p>For more information about WPHA delineation methods, see https://www.epa.gov/sourcewaterprotection/delineate-source-water-protection-area#:~:text=Delineations%20are%20often%20described%20as,contaminants%20to%20reach%20the%20well. (Please note, we don’t recognize the “arbitrary radial distance” approach.)</p>	
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	<p>WHPAs are recognized as one type of CARA (WAC 365-190-100). A local jurisdiction (other than one that operates its own water system, in context of delineating its own system’s WHPAs) does not have a role in determining the location of WHPAs; as explained above, that is up to the water purveyor & DOH. We encourage local jurisdictions to view such delineations as part of their BAS in terms of identifying their CARAs. The DEIS statement calling for a “more thorough analysis” to evaluate whether protections are needed seems to ignore the system’s <i>Watershed Protection Plan</i> as BAS. We encourage the City to modify the CARAs discussion in the DEIS to recognize this small sliver of the duly approved WHPA as a CARA, then to designate & regulate it via the City’s critical areas ordinance update. The text on p. 6-5 should be modified accordingly. It could be added to Fig. 6.2, Water Related Critical Areas in Shoreline (p. 6-7) or inserted as a new Fig. 6.2 while renumbering the rest. The bulk of this area overlays fairly dense, established single-family residential development. Google satellite imagery additionally identifies a couple of adult family homes in the area, & there is a small amount of developed commercial area nearest Aurora.</p> <p>Lastly, I can see from the SEPA Register that the DEIS was issued on October 15, but it doesn’t appear that the DEIS was received in our agency SEPA mailbox. In comparing prior notices to the SEPA Register, it seems that we are receiving some SEPA notices from Shoreline but not others. DOH is among the SEPA lead agencies that should receive notifications. Please ensure that your SEPA notifications are provided to SEPA.reviewteam@doh.wa.gov.</p> <p>Thank you for considering our comments. Please let me know if you need additional information or if I can answer any questions.</p>	
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