



January 20, 2009

Molly Harris
City of Tacoma
Tacoma Economic Development Department
747 Market St, Rm 1036
Tacoma, WA 98402

Subject: City of Tacoma – Shoreline Master Program Updates: Restoration Plan

Dear Ms. Harris:

Thank you for the opportunity to comment on the Shoreline Master Program Update – Restoration Plan. The Department of Natural Resources (DNR) comments are based solely on our role as the proprietary manager of State Owned Aquatics Land.

State Owned Aquatics Land consists of the navigable waters of the State, with the exception of tideland or shoreland properties which have been sold. Within the boundaries of the City of Tacoma, the State asserts ownership within Commencement Bay, the Tacoma Narrows, Thea Foss Waterway, Middle Waterway and the Puyallup River.

General Comments:

- 1) The Restoration Plan references several other planning processes, such as the Open Space Plan, Shoreline Inventory, and Watershed Resource Inventory Analysis. It would be helpful if there was a summary, or graphic, showing how the information developed in these different planning processes shaped the Restoration Plan.
- 2) The plan goes from overarching goals and objectives in Section 4, to how those goals and objectives generally apply in different shoreline zones in Section 5. However, there is no link to specific restoration projects. It would be helpful to identify some specific projects for each shoreline zone which could be feasibly executed within the next seven years. There is a fairly substantial list of projects proposed for Commencement Bay and the surrounding areas.
- 3) Pierce County is currently going through the same restoration planning process. Some projects Pierce County is developing within the city limits include: Puget Creek Beach Restoration and Titlow Saltmarsh Restoration. The contact for restoration in Pierce County is Tom Kantz, Pierce County Special Projects.

Specific Comments:

- 4) Section 3.2 “Defining Restoration”- Without quantitative values for the baseline conditions, the concept of no net loss of ecological function has no context. The Shoreline Inventory information should be quantitatively summarized to establish a baseline condition which can be directly linked to restoration monitoring and metrics. For example: One of the metrics identified is “acres of feeder bluffs which are connected to the shoreline” and “feet of feeder bluff along the shoreline”. To make the Restoration Plan more meaningful, it would be worthwhile to quantitatively summarize:
 - a. How many acres/lineal feet of feeder bluffs available within Tacoma
 - b. The percentage of the feeder bluffs which are connected vs. unconnected.
 - c. Acres/ lineal feet feasibly available for restoration

- 5) Section 5.1 “Opportunities - Table 2 “Ecological Processes, Restoration Goals and Objectives and Associated Actions”-
 - a. Metrics and monitoring should include target values [i.e. acres/lineal feet of feeder bluff restoration.
 - b. Some of the restoration opportunities identified do not seem feasible in given shoreline zones.

- 7) Section 7.3 “Strategies” - The City should work with the community to develop strategies which could be used by private property owners when redeveloping existing site. For example, conservation easements have been used in many riparian areas. Purchase of conservation easements provides a funding source for private property owners who are interested in redeveloping property and incorporating restoration features.

The DNR looks forward to working with the City of Tacoma to develop an integrated landscape picture of restoration within your shoreline management area. We have a wide variety of restoration related information including: site specific restoration information, historic aerial photography, geological maps, and submerged aquatic vegetation information. Thank you for the opportunity to submit comments. If you have any questions regarding these comments, please contact me at 206-949-1740.

Sincerely,



Lindie Schmidt, Natural Resource Specialist

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