Planning & Development Services

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Public Comments on Climate Element

Count	Last Name	First Name	Organization/ Address	Comment Method	Date Received
1	Hagin	Emily	Puget Sound Energy 1110 Kentucky Street Bellingham, WA 98229	Email	06/26/2024
2	Stamm	Joan	4824 New Woods Place Mount Vernon, WA 98274	Email	06/26/2024
3	Careret	Betty	14786 Entner Lane Anacortes, WA 98221	Email	06/28/2024
4	Doran	Molly	Skagit Land Trust	Email	07/12/2024
5	Bridgman	Peggy	1121 East Orange Avenue Burlington, WA	Email	09/27/2024
6	Shimeall	Nancy	74 Hoh Place La Conner, WA 98257	Email	10/01/2024
7	Moore	Virginia	22342 Shady Lane Mount Vernon, WA 98274	Email	10/22/2024
8	Cross	Joan	708 S 4th Street La Conner, WA 98257	Email	10/28/2024
9	Shimeall	Nancy	74 Hoh Place La Conner, WA 98257	Email	10/30/2024
10	Olson	Craig		Email	11/01/2024
11	Gregory	William	Sedro-Woolley	Email	11/02/2024
12	Dix	Teresa	3124 Dakota Drive Mount Vernon, WA 98274	Email	11/03/2024
13	McJunkin	Lin	Conway	Email	11/05/2024
14	Roberts	Sarah	Anacortes	Email	11/09/2024
15	Holder	Mary & Phillip	201 S 7th St Mount Vernon, WA 98274	Email	11/09/2024
16	Link	Virgene		Email	11/09/2024
17	Cross	Ellie	Mount Vernon	Email	11/10/2024
18	Hostler	Bob & Ann	1004 Commercial Ave #1021 Anacortes, WA 98221	Email	11/11/2024
19	Gleason	Mary		Email	11/11/2024
20	Brown Randles	Melinda	204 South 5th Street Mount Vernon, WA 98274	Email	11/12/2024
21	Katz	Aaron	1616 Georgia Place Anacortes, WA 98221	Email	11/13/2024

22	Agler	Leigh	1223 S 11th Street Mount Vernon, WA 98274	Email	11/13/2024
23	Natalie	Niblack		Email	11/13/2024
24	Studley	Diane	3309 Erika Lane Mount Vernon, WA 98273	Email	11/13/2024
25	Dix	Teresa	3124 Dakota Drive Mount Vernon, WA 98274	Email	11/14/2024
26	DiLabio	Gena	3124 Dakota Drive Mount Vernon, WA 98274	Email	11/14/2024
27	King	Marina	3509 D Avenue #F3 Anacortes, WA 98221	Email	11/14/2024
28	Gastellum	Carolyn	14451 Ashley Place Anacortes, WA 98221	Email	11/14/2024
29	Hansen	Ken		Email	10/25/2024
30	Hughes	Michael	Ag Advisory Board	Email	11/15/2024
31	Chamberlain	Marylee	La Conner	Email	11/16/2024
32	Shafansky	Paula		Email	11/16/2024
33	Chamberlain	Marylee	La Conner	Email	11/17/2024
34	Shannon & Osmundson	Colleen & Jeff	27626 65th Lane NW Stanwood, WA 98292	Email	11/17/2024
35	Ratermann	Peggy (Mary)	1806 Cascade Vista Burlington, WA 98233	Email	11/17/2024
36	Friebel	Jenna	2017 Continental Pl, Suite 4 Mount Vernon, WA 98293	Email	11/18/2024
37	Raymond	Bob	608 S 2nd Street	Email	11/18/2024
38	Sidbury	Anne	610 Longview Avenue Anacortes, Washington 98221	Email	11/18/2024
39	Hinton	Ingrid & Charles	22128 SR 9 Mount Vernon, WA 98274	Email	11/18/2024
40	Erbstoeszer	Marie	217 E Division St Mount Vernon, WA 98274	Email	11/18/2024
41	Farrar	Judy	13033 Sunrise Drive Mount Vernon, WA 98273	Email	11/18/2024
42	Karp	Merna	Burlington	Email	11/18/2024
43	Faxon	Beverly	20757 Anderson Road Burlington, WA 98233	Email	11/18/2024
44	Shimeall	Nancy	74 Hoh Place La Conner, WA 98257	Email	11/18/2024
45	Levens	Aimee & Daniel	Mount Vernon	Email	11/18/2024
46	Lee	Harold & Hella	2500 S. 18th St. Mount Vernon, WA 98274	Email	11/18/2024

47	Zak	Alison	14830 Baker Heights Road Mount Vernon, WA 98273	Email	11/19/2024
48	Ullman	Carl	5162 West Shore Road Anacortes, WA 98221	Email	11/19/2024
49	Hopkins	Lisa	4914 New Woods Place Mount Vernon, WA 98274	Email	11/19/2024
50	Epstein	Heidi	16703 Beaver Marsh R. Mt. Vernon, WA 98273	Email	11/20/2024
51	McKay	Eiren	22953 Bumblebee Lane Mount Vernon, WA 98273	Email	11/20/2024
52	Middleton	Anne & Jack	12694 Josh Wilson Rd Mount Vernon, WA	Email	11/20/2024
53	Baker	Judy	1504 Alpine View Pl Mount Vernon, WA 98274	Email	11/20/2024
54	Spore	Heather	Swinomish Indian Tribal Community; Department of Environmental Policy	Email/letter	11/21/2024
55	Hillery	Jamie	Skagit County Forest Advisory Board	Email	11/21/2024
56	Pietrone	Alison	24307 Lee Rd. Mount Vernon, WA 98274	Email	11/21/2024
57	Jann	Elizabeth	PO Box 2112 Mount Vernon, WA. 98273	Email	11/21/2024
58			Indivisible Skagit	Mail	11/22/2024
59			Skagit Audubon Society PO Box 1101 Mount Vernon, WA 98273	Mail	11/22/2024
60	Nelson	Terry	701 Whatcom St., PO Box 100, La Conner, WA	Email	11/21/2024
61	Chilcote	Judith	22303 Little Mountain Road Mount Vernon, WA 98274	Email	11/21/2024
62	Steele	Sophia	The Western States Petroleum Association; Northwest Region	Email	11/21/2024
63	Rose	Valerie	1434 S. 12th St. Mt. Vernon WA 98274	Email	11/22/2024
64	Ury	Eddy	RE Sources	Email	11/22/2024
65	Winkes	Anne	PO Box 586, Conway WA 98238-0586	Email	11/22/2024
66	Brooking	Ann	16465 Dragonfly Lane Bow, WA 98232	Email	11/22/2024
67	Pedersen	Sarah	703 St. Marys Drive Anacortes WA 98221	Email	11/22/2024
68	Ellis	Lisa	426 Tristan Place Mount Vernon, WA	Email	11/22/2024

69	Selting Smith	Katherine Elaine	17622 Greenacres Rd. Mount Vernon, WA 98273	Email	11/22/2024
70	Loring	Kyle	Evergreen Islands	Email/letter	11/22/2024
71	Cunningham	Brenda	Indivisible Skagit Support Team	Email	11/22/2024
72	Day	John	Skagit Audubon Society - Skagit Audubon Board	Email	11/22/2024
73	Malley	Kathy	Guemes Island Planning Advisory Committee	Email	11/22/2024
74	Hite	Emma	15407 Colony Road Bow, WA 98232	Email	11/22/2024
75	Siniscal	Joyce	429 Cayuse Place La Conner WA 98257	Email	11/22/2024
76	Skinner	Ann	6790 San Juan Hill Lane Anacortes, WA 98221	Email	11/22/2024
77	Durand Robblee	Nancy	21072 Mann Road Mount Vernon, WA 98273	Email	11/22/2024
78	Doran	Mollly	Skagit Land Trust	Email	11/22/2024
79	Burnham	Elma	811 W Hazel St, Mount Vernon, WA 98273	Email	11/22/2024
80	Hitchko	E. Bruce	1029 E. Orange Ave Burlington, WA 98233	Email	11/22/2024
81	Philbrick	Annie	17978 McLean Road Mount Vernon, WA 98273	Email	11/22/2024
82	Lindsay	Ron	Anacortes, WA	Email	11/22/2024
83	Roberts	Sarah	1303 26th St. Anacortes, WA 98221	Email	11/22/2024
84	Stapleton	Timothy	Washington Department of Fish and Wildlife Region 4, Habitat Program	Email/letter	11/22/2024
85	Diephuis	Liam	414 Park Street, Mount Vernon, WA	Email	11/22/2024
86	Day	John	6368 Erwin Lane Sedro Woolley, WA 98284	Email	11/22/2024
87	Knudsen	E. Eric	13033 Sunrise Dr. Mount vernon, WA 98273	Email	11/22/2024
88	Gardiner	Karen	726 N 14th Street Mount Vernon, WA 98273	Email	11/22/2024
89	Bray	Martha	6368 Erwin Ln Sedro Woolley, WA	Email	11/22/2024
90	Good Rubenstein	Kim	Skagitonians for the Preservation of Farmland	letter	11/25/2024
83	Roberts	Sarah	1303 26th St. Anacortes, WA 98221	Email	11/22/2024
84	Stapleton	Timothy	Washington Department of Fish and Wildlife	Email/letter	11/22/2024

			Region 4, Habitat Program		
85	Diephuis	Liam	414 Park Street, Mount Vernon, WA	Email	11/22/2024
86	Day	John	6368 Erwin Lane Sedro Woolley, WA 98284	Email	11/22/2024
87	Knudsen	E. Eric	13033 Sunrise Dr. Mount vernon, WA 98273	Email	11/22/2024
88	Gardiner	Karen	726 N 14th Street Mount Vernon, WA 98273	Email	11/22/2024
89	Bray	Martha	6368 Erwin Ln Sedro Woolley, WA	Email	11/22/2024
90	Good Rubenstein	Kim	Skagitonians for the Preservation of Farmland	letter	11/25/2024

Climate Comment #1

Tara Satushek

From: PDS comments
Sent: Wednesday, June 26, 2024 11:50 AM
To: Tara Satushek; Robby Eckroth
Subject: FW: Skagit County Comprehensive Update
Attachments: PSE Comp Plan Language Comments April 2024.xlsx

From: Hagin, Emily <Emily.Hagin@pse.com>
Sent: Wednesday, June 26, 2024 11:48 AM
To: Jack Moore <jrmoore@co.skagit.wa.us>; PDS comments <pdscomments@co.skagit.wa.us>
Cc: Heinrich, Brian <Brian.Heinrich@pse.com>
Subject: Skagit County Comprehensive Update

Dear Jack Moore,

On behalf of Puget Sound Energy (PSE), I am reaching out to convey our thoughts for your consideration as part of the periodic update to the comprehensive plan and development regulations under the Revised Code of Washington (RCW), specifically Chapters 36.70A and 43.21C.

The attached spreadsheet contains suggested language as it relates to customer programs and our shared climate goals. In the attached, you will find 7 tabs grouped by category.

At PSE, we recognize that climate change is one of the biggest existential threats facing our planet today. As one of the largest producers of renewable energy in the Pacific Northwest, PSE has been an early leader in addressing climate change and investing billions in renewable resources and energy efficiency for homes and businesses. Now, PSE is on the path to meet the current and future needs of its customers and to deliver on the requirements to decarbonize operations and serve its customers and communities equitably. This transition is unprecedented in terms of the magnitude of the change and the accelerated time frame in which it must be achieved. By working together, we can successfully drive towards our shared clean energy goals.

PSE looks forward to providing input as the comprehensive plan items are discussed in more detail. Together, we can reduce emissions and keep energy safe, reliable, and affordable.

Thank you,

Emily Hagin
Sr. Municipal Liaison Manager – (Whatcom/Skagit)
1110 Kentucky Street
Bellingham, WA 98229
Phone: 360-319-6424
PUGET SOUND ENERGY

Wildfire Preparedness	
PSE Program	Model Comp Plan Language
Wildfire Mitigation	
Situational Awareness: PSE evaluates the condition of the electric system, as well as the environment around it, using real-time weather data, wildfire risk modeling and pre-wildfire season inspections. **Strengthening the electric system:** PSE regularly maintains and updates the electric system to provide safe and reliable power to our customers. In areas of high wildfire risk, we identify maintenance and improvement activities that will further reduce the risk of wildfire, including ***vegetation management*** , equipment upgrades, and in some cases, moving power lines underground. **Operational Procedures:** During wildfire season, PSE may change some device settings or implement operational procedures to reduce the risk of wildfire. In the future, PSE may proactively turn off power during high wildfire risk conditions to help prevent wildfires. This is called a ***Public Safety Power Shutoff (PSPS)*** . **Emergency Response:** During an emergency, including an active wildfire, PSE will coordinate with local emergency officials and may implement emergency response procedures. This may include turning off power at the request of emergency officials for public and first responder safety.	Support PSE's wildfire mitigation efforts including electric system upgrades, year-round vegetation management, and fire weather operational procedures. Work closely with utilities and local fire departments to lessen the risk and impact of wildfires.

Gas Conservation & Decarbonization	
PSE Program	Model Comp Plan Language
Gas Decarbonization	
Renewable Natural Gas Production Utilizing wastewater facility, landfill, or similar system.	Evaluate the potential for renewable, recoverable natural gas in exisiting systems.

June 26, 2024

Climate Comment # 2

To: Tara Satushek and Robby Eckroth

From: Joan D. Stamm
4824 New Woods Pl.
Mount Vernon, WA 98274

Re: Skagit County's 2025 Comprehensive Plan

Dear Tara and Robby,

Thank you for hosting tonight's community meeting in Sedro Woolley. I learned a lot about various community needs and issues.

Although I attended to specifically address preserving the Eaglemont Golf Course land as a pristine wilderness and wildlife corridor, I now understand that I need to take my concerns primarily to the City of Mount Vernon. However, since the Eaglemont lands border unincorporated County lands, including the Eaglemont land, county involvement in including these lands into your Open Space Plans would seem to be relevant. Please consider.

As a member of the Skagit Land Trust, the Washington Native Plant Society, the Xerces Society and a working member of Skagit Master Gardeners, I would like to see a more sustainable and ecologically balanced approach to all land in Skagit County. Some ideas include:

1. Incentivizing homeowners to remove all or some of their turf lawn (as some counties already do) to be planted with native trees, shrubs and wildflowers. This would provide more wildlife habitat, sequester more carbon, encourage pollinators, contribute to biodiversity and address water conservation.
2. Encourage public schools, community centers, government buildings, and libraries to plant trees and native plants, to install solar panels and to compost food and yard waste.
3. Preserve open spaces, forests, meadows, and farmland for future generations.
4. Incentivize buying electric powered lawn mowers and leaf blowers to reduce carbon emissions, or switching, where feasible, to rakes, brooms & push mowers.
5. Reduce or eliminate the use of pesticides, herbicides and insecticides on County controlled land in order to preserve pollinators and to reduce air and water contamination.

The County has great potential in reducing carbon emissions, water and air pollution, habitat loss, and species extinction. Government regulations are needed to create a healthier ecosystem. I hope you will use your power and influence to do just that.

Best regards,
Joan D. Stamm
jstamm@seanet.com

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Tara Satushek Climate Comment #3

From: Betty Carteret <sydster2@outlook.com>
Sent: Friday, June 28, 2024 12:30 PM
To: Robby Eckroth; Tara Satushek
Cc: Skagit CCL Gmail Account (skagitccl@gmail.com)
Subject: Feedback on Comp Plan Meeting July 26th.
Attachments: GMA Comments 2.docx; GMA Mtg Comments 1.docx

Tara and Robby,

I was very nice meeting you at the Comprehensive Plan meeting in Sedro Woolley. I was the one with the typed comments on the shipping labels that I left with Robby (that I have attached again here). As a little background, I am a mechanical engineer retired from the Pacific Northwest National Laboratory in the Tri Cities. Since retiring in 2005, I have been focused on climate change education and outreach and have taught classes and give countless presentations in the area on climate change and the transition to clean energy and electrification.

I am currently the lead for the Skagit Chapter of Citizens Climate Education, a national organization with over 500 chapters in the US. We have a small, active chapter of people working on climate change outreach in Skagit County that is solutions oriented. I am personally working on educating people about building efficiency and electrification, but I am also very concerned about water issues in Skagit County driven by climate change. I believe there is a great opportunity to find integrated solutions to the current and projected increases of flooding and drought in our county. I personally urge that you include in your climate resilience element a study to identify the best options to store floodwater from the Skagit River (reservoirs, underground storage, aquifer recharge – or others) that can be drawn on during summer months for agricultural irrigation, residential and business use, as well as for salmon recovery and recreation. The solution(s) are going to be big projects and costly, so it is important that the county get started now on this as part of our resilience work and take advantage of funding available for such work through the Dept. of Commence and the Climate Commitment Act. There are several other areas that I'd like to discuss as the planning process unfolds.

I also encourage you to establish a climate advisory team that can help with the planning process and bring in perspectives from residents, local nonprofits, community leaders and trusted voices for key stakeholder groups. This is recommended in Section 2 of the State GMA Climate Element guidance prepared by the Department of Commerce. Skagit County is lucky to have our own local experts on climate change, the Skagit Climate Science Consortium, as well as several nonprofits committed to this area that could provide representatives to support such a team. Our organization would be happy to appoint a representative to work with you and we are collaborating also with the Skagit Clean Energy Alliance another group that might be interested in participating.

Thanks for hosting the informative session on July 26th and I look forward to continuing to connect with you as the process continues. Betty

Betty Carteret, Chapter Lead
Citizens' Climate Education, Skagit County, WA Chapter
skagitccl@gmail.com; (360) 299-8553 (h); (360) 202-0316
https://citizensclimateeducation.org/
14786 Entner Lane
Anacortes, WA 98221

Water Management: projected flooding and drought due to climate change present an opportunity to develop joint solutions when you look at this as managing water to store excess for times of drought. Skagit County should evaluation options for developing large water storage capacity that can be drawn down during summer months to support agricultural irrigation, residential and business usage, tourism/water sports, and also as a resource for wildfire suppression and to recharge aquifers. Betty Carteret; sydster2@outlook.com

Water management – start planning on developing new infrastructure for water storage from flooding early to enable time for thorough analysis, planning, and seeking funding to pay for such large infrastructure projects. Identify needs for revenue from grants, state programs, and possibly funding from residents of the county through appropriate measures (fees, taxes etc).
This needs to be a priority.
Betty Carteret; sydster2@outlook.com

Reduce GHG Emissions through electrification: Electrification of residential, rental, and business properties can make a major contribution towards reducing emissions in Skagit. There are organizations in the County that can help with this such as the Skagit Clean Energy Association and Skagit Citizens' Climate Education (I am local chapter lead). Provide free mentors or coaches who can get people started with planning and refer to experts. Betty Carteret; sydster2@outlook.com

Look for ways that Skagit County can participate and benefit from building out of the electrical grid. This is happening to meet the increased electricity demands and could be an opportunity for the County.

Betty Carteret; sydster2@outlook.com

Evaluate and streamline county planning requirements, permitting and regulations to support transition to electric vehicles, home HVAC, and other residential and business electrification efforts.

Betty Carteret, sydster2@outlook.com

Find ways to make mass transit more attractive to a larger segment of the population. Find out what limits peoples use of buses and find ways to improve the barriers.

Improve bike travel on county roads. Look to work done in other communities to provide bike trails both for recreation and for transit. Consider increasing bike lanes and other safety measures.
Betty Carteret; sydster2@outlook.com

Look for ways for Skagit County to use funding resources available from both the State (Dept. of Commerce) and Federal Government that area available through the WA Climate Commitment Act, US Infrastructure and Inflation Reducation Acts. These funds are available now and can help the county with funds for planning, education, and infrastructure development.

Betty Carteret; sydster2@outlook.com

Develop programs in partnership with the state and PSE to educate homeowners, renters, landlords and businesses on the benefits of energy efficiency and electrification to achieving goals for reducing greenhouse gas emissions. There are many resources to help with this and local groups that can help such as our chapter of Citizens' Climate Education.
Betty Carteret; sydster2@outlook.com

Review permitting for residential and business building and look to limit development in areas that are vulnerable to flooding, sea level rise, and wildfires.

Look at strategies for retreating from hazardous areas on the coast versus increasing shoreline armoring that impacts marine habitat and species.

Betty Carteret; sydster2@outlook.com

Because the PNW will see less impacts of climate change we can expect large population growth in coming decades due to climate migration. We need to be planning ahead on how to manage this growth while protecting our critical farmland, which will be even more important as other areas such as California and Midwest are impacted harder by climate change.

Betty Carteret; sydster2@outlook.com

Population growth in future will need to be managed by looking at urban growth and identifying ways to site housing and transit to limit the need for car travel. Avoid concepts of Fully Contained Communities that drive increased GHG from car emissions.

Betty Carteret; sydster2@outlook.com

Develop public education campaigns on the projected impacts of climate change in Skagit County but include education on what individuals, businesses, and visitors can do to reduce their carbon footprint including residential electrification; transition to EVs; supporting county and other programs that work for this.

Betty Carteret; sydster2@outlook.com

Educate public on funding available to help them transition to electric appliances, HVAC, EVs, and other items. This will help increase participation and reduce GHG emissions.

Betty Carteret; sydster2@outlook.com

Educate county employees on the plans and goals for the climate actions included in the new Comp Plan to increase support and participation. Create incentives that could get people excited about their work and efforts.

Betty Carteret; sydster2@outlook.com

Educate landlords and large property developers about goals to reduce emissions through efficiency and electrification. Create goals to reduce emissions from large residential units (apartments etc.) and support things like solar panels, weatherization etc.

Betty Carteret; sydster2@outlook.com

Look for programs already developed in other counties and cities that can be replicated in Skagit County.

Betty Carteret; sydster2@outlook.com

Form a Climate Policy Advisory Team including representatives of local organizations, citizens, community leaders (especially in lower income communities).

Betty Carteret; sydster2@outlook.com

Climate Comment #4

SUGGESTIONS FOR SKAGIT COUNTY'S COMPREHENSIVE PLAN UPDATE

7/12/2024
From Skagit Land Trust

Climate Change

Form a task force to work with staff to write a Climate Action Framework for Skagit County. The more communities participate in planning and strategy, the more realistic and effective the plan.

- **Compose a diverse task force with representatives from organizations and community members that reflect our "whole system".** At the table should be those focused on health, transportation, housing, conservation, natural resources, business, tourism, social justice, etc.
- Aim to work across jurisdictions (towns, cities, county) and have common, integrated goals and programs**.**
- **Climate impacts fall hardest on those that did the least to cause them.** Actions must assist these people and **they must be at the table.**

A Framework will not only help the County but also assist community-based organizations to help develop climate solutions.

- M**ake a base map of the areas most vulnerable** to climate change as part of the Comprehensive Plan Supplemental Map section. This should include sea level rise, river flooding, excessive fire danger, geologic hazard areas (landslides, alluvial fans, erosion areas), areas with infrastructure hazards/potential failure that will be at increased risk with climate changes.

- **Speed up efforts to map the true 100-year flood plain**. Map how it will change over time.

- **Consult with the Skagit Climate Science Consortium. They** are local experts on climate change and have local data to inform this map.
  - Their maps use best available science and are free: ww.skagitclimatescience.org/flood-scenario-map/

Resiliency

EDUCATION:

- **Publish the map of potentially impacted areas that climate models show.** If people know they are vulnerable, they are more likely to move voluntarily or submit to voluntary buy outs or other options.

- We also appreciate the County's mapping exercise at Open Houses which incorporates local knowledge and should be used with above.

- **Explore how resiliency options could work and make the options public so that people are educated on concepts and how they work. Consider:**
  - Managed retreat.
  - A Transfer of Development Rights (TDR) program or other incentives to encourage property owners to move or exchange development rights voluntarily.
  - Use of grant funds and mitigation programs for voluntary buy outs by government organizations and conservation organizations.

- **Make a county web page on Climate Change and Resiliency: facts, tactics, science, stories and guidance such as "Best ways to lower your carbon footprint".**

REGULATION:

- **Pass Conservation Subdivision regulations.** This would allow professional conservation organizations or government entities to purchase part of a property from a voluntary landowner for strict conservation purposes without going through the current arduous and expensive subdivision process. A conservation easement would be placed on the land purchased to ensure it was not developed. This is a win-win for adapting to climate change and for landowners who often want to keep the productive parts of their land, or move their home to a resilient location, but do not want to manage sensitive or increasingly hazardous excess acreage.

- **Have a Goal to Stop Putting Development in Harm's Way. Enact a mixture of voluntary incentives, education and regulations to:**
  - restrict further development in the 100-year flood plan.
  - restrict new development in natural hazard areas.
  - restrict new development in areas most vulnerable to sea level rise.

- **Enact code that allows more land to be "sponges" and pollution strainers.**
  - Allow for 100% recycling of household grey water in appropriate circumstances.
  - Lessen impact of storm water system through controlled release and evaporation systems (natural greenspace protection, green roofs)
  - Allow for experimentation in new homes or neighborhoods i.e. circular sewer systems.
  - Add stricter code that protects aquifers, with special attention to sole source aquifers.

- **Skagit County should actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years**.
  - Conduct a sea-level rise vulnerability assessment and make it public.
  - Add language that avoids construction in tidal and storm surge areas.

- Select a base elevation for all structures, utilities, and septic systems that will withstand inundation or destabilization for at least 60 years based on best available science.
- Ensure robust shoreline buffers on both marine and freshwater shorelines with strict limits for variances.
- Require that development on feeder bluffs have setbacks that reflect the typical lifespan of a building (i.e. 55 -100 years).
- Stress avoidance of new overwater structures. Any new overwater structures should minimize and mitigate impacts to eelgrass, kelp, and other critical environments.
- Limit hard armoring of shorelines to situations where there is no other alternative to protect an existing structure.
- Do not classify boulders as soft armoring.
- Require that new development be situated to avoid needing shoreline stabilization.

- **Develop systems to preserve our forests, wetlands, water and soils for natural carbon storage** as a way to reduce carbon emissions in the County.
  - Identify carbon sequestration as a compatible forestry practice for Open Space taxation.
  - Allow increased carbon storage (bio-char, etc.), including through mitigation programs, as compatible agricultural land uses for Open Space taxation.
  - Adopt strict critical area code for science-based buffer widths to protect and restore healthy freshwater and coastal wetlands in all land use areas. These store more carbon per acre than any habitat on earth. They also buffer communities from sea level rise, flooding, and fire.

PLANNING & STRATEGY

- **In the comprehensive plan chapters on Land Use, Natural Resources, and Environment elevate natural resource conservation for all types of land.** Prioritize conserving lands that mitigate climate change while helping provide clean water, unpolluted air, the ability for communities to adapt to changing conditions, and places for fish and wildlife to adapt.

- **Develop a transportation plan that incorporates sea level rise and natural hazard conditions into its planning.**
  - Identify roads at risk of erosion, natural hazards, or inundation due to climate change.
  - Have a plan that accepts that not all lands currently behind dikes or levees will remain viable for development or agriculture.
  - Develop ways for towns and neighborhoods with access roads at risk to help pay for dike and drainage infrastructure protecting those roads.

- **Update the Skagit Countywide UGA Open Space Concept Plan with climate change and green connectors in mind. Reduction of Greenhouse Gases (GHGs)**

- **Focus on the causes of GHG emissions.** Every solution should be linked to the causes.

- **Create incentives to build electric vehicle charging infrastructure in rural areas,** including eastern Skagit County. Currently there are no public charging stations upriver, which greatly reduces incentives to move to electric transportation.

- **Prioritize the development of interconnected trails systems between towns and cities to decrease the use of motorized vehicles.**
    - Increase ways for communities to use non-carbon transportation- trails, bike paths, electric charging stations.
    - Allow public access trails on dikes. Develop incentives and protections for dike districts and adjacent landowners.
    - Develop additional trails to attract recreationists and eco-tourists (such as birders) increasing the county's tourist economy without increasing the carbon footprint. Eco-tourism contributes over $20 billion to Washington's GDP and growing. Skagit County is uniquely positioned to capitalize on this trend with more tourist infrastructure such as trails and wildlife viewing sites.
    - Make completing the Centennial Trail from Snohomish County to Whatcom County a priority.
    - Develop a bike path from Edison to Burlington. The Samish Flats are a tourism site needing safer passage for bikers and walkers.

- **Work with cities and towns to help them plan for and absorb more people, homes, and businesses.** Modify the population distribution goal so that 90% of new population growth is in urban areas (rather than the current 80% goal).

- **Encourage 20-minute neighborhoods**. 20-minute neighborhoods are places where residents have easy, convenient access to many of the places and services they use daily including grocery stores, restaurants, schools, and parks, without relying heavily on cars. Increasing the walkability of neighborhoods will reduce the county's carbon output. **Encourage smaller "truck" farms on the edges of cities and towns through zoning incentives.**

- **Focus strongly on keeping growth in urban areas and making those urban areas livable.**
    - Establish high thresholds for when cities and towns are allowed to expand their Urban Growth Areas (UGAs).
    - Do not allow UGAs to expand into floodplain or critical areas.
    - Have programs that purchase development rights around UGAs to contain development and provide green spaces, parks, and trails. Green spaces will also help absorb storm waters and keep urban areas cooler.

- Stop sprawl by outlawing Fully Contained Communities (FCC) in rural areas. FCCs increase GHG emissions as they contribute to increased vehicle use.

- **Develop Plans to Reduce harm including erosion, floods, and sea level rise by planning for green systems that allow natural processes to operate**.

- **Focus on connecting green spaces and wildlife corridors so wildlife can move freely as their habitat changes or is lost.**

Climate Comment #5

Tara Satushek

From: Peggy Bridgman <bridgmannoe@gmail.com>
Sent: Friday, September 27, 2024 8:02 AM
To: PDS comments
Subject: Skagit County's Comprehensive Plan Draft Policies

To whom it may concern:

I will be unable to attend the meeting on October 1. I am sorry about your timing of the meeting, which coincides with the Vice Presidential Debate that evening.

Climate change is the most pressing issue of our time in my opinion. Everything we humans do hinges on the condition of the Earth that has been entrusted to us. Therefore I urge you to treat the Climate Element of the 2025 Comprehensive Plan with the utmost urgency. People complain about the cost of mitigation measures, but they are ignoring the fact that repairing the damage caused by weather-related and other catastrophes will cost many times more.

It won't be cheap to make changes to our systems and behaviors, but the future of our planet depends on hard decisions that we make now. Please include bold proposals in the Comprehensive Plan to slow the damage we have already done.

Sincerely,
Peggy Bridgman
1121 East Orange Avenue
Burlington

Tara Satushek Comment # 6

From: Nancy Shimeall <nshimeall@gmail.com>
Sent: Tuesday, October 1, 2024 3:29 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

This email is regarding the "**Environment and Climate Change, Resiliency and Greenhouse Gas Emission Reduction**" portion of the 2025 Comp Plan draft. We are unable to attend the Open House on October 1 due to several other events and obligations occurring on the same day at the same time. (Attendance by other residents at this one Open House will likely be impacted.) Please consider the following comments:

My family and I are deeply concerned about the county's plans to reduce greenhouse gases and improve our quality of life while facing the oncoming climate challenges. Skagit County has so far not taken enough action to reduce GHGs, and we hope this comp plan update ignites a desire to become a leader and consider innovative approaches to reducing our emissions.

Our primary comments are to urge these first two actions, as delineated in the very helpful resource at Climate Policy Explorer (arcgis.com):

1. **Prioritize improving the energy efficiency of both government, commercial, and residential buildings**: Retrofit county buildings for energy efficiency (Policy - ID#: E.03); phase out natural gas use in existing publicly owned facilities by 2030 and retrofit with electric heat pumps (Policy - ID#: E.05). In addition, ensure that buildings use renewable energy, conservation, and efficiency technologies and practices to reduce greenhouse gas emissions (Goal - ID#: E)
2. **Prioritize and enhance the county's trees and forests**: Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality; prioritize overburdened communities (Goal – ID#: AB). Establish a green belt of parks to support connectivity and non-motorized travel between housing, schools, and businesses across the community (Policy - ID#: AB.02); and maximize tree canopy coverage in surface parking lots (Policy - ID#: AB.04).

Additionally, Skagit County can enhance its environmental sustainability AND reduce Greenhouse gases through several initiatives.

1. Expanding Public Transit and Bike Infrastructure: To reduce the city's carbon footprint, invest in sustainable transportation options. Expanding its bus networks and encouraging the use of electric buses can lower emissions. Improving bike lanes, creating bike-sharing programs, and promoting walking can reduce reliance on cars, thereby lowering traffic congestion and air pollution.

2. Encouraging Electric Vehicles (EVs): To promote the use of EVs, **install more EV charging stations throughout the county**. The Mount Vernon library transportation hub is a great start; we need similar hubs across the county. Offering incentives for residents and businesses to transition to EVs and hybrid vehicles will contribute to reducing the county's greenhouse gas emissions.

3. Green Building Initiatives: Encourage **sustainable development** by adopting stricter **energy-efficient building codes** for new constructions and renovations. Provide incentives for developers to use **eco-friendly materials** and implement energy-saving technologies like **solar panels**, **green roofs**, and **smart energy systems**.

4. Increasing the use of renewable energy like solar, wind, and hydroelectric power in all buildings can make Skagit County more sustainable. Also partner with utilities to provide incentives for residents and businesses to **switch to clean energy**.

5. Skagit County should boost its **waste reduction** initiatives by expanding **recycling** and **composting programs**. Offering educational workshops to encourage residents to minimize **single-use plastics**, **compost food waste**, and **recycle** correctly would contribute to a more sustainable waste management system.

6. Protecting, maintaining, and expanding the county's **green spaces** is crucial for biodiversity and reducing **urban heat island effects**. Skagit county could prioritize the preservation of parks, wetlands, and forests, and create new urban gardens and green areas for residents to enjoy.

These strategies can significantly increase Skagit County's environmental sustainability, reduce its greenhouse gases, and improve quality of life for residents.

Thank you for considering these comments. Again, we wish to emphasize the excellent resource at Climate Policy Explorer (arcgis.com), which offers more details and is designed to assist the comp plan updates required at this time.

Respectfully,

Nancy Shimeall
Steve Cotter
74 Hoh Place
La Conner, WA 98257
cell 360-708-4014

We live on reservation land that has been stewarded for thousands of years by the Swinomish Coast Salish People, and are grateful that the Swinomish people will continue to hold sacred this land for future generations.

Tara Satushek

Comment # 7

From: Ginger Moore <gingermoore5@hotmail.com>
Sent: Tuesday, October 22, 2024 10:46 AM
To: PDS comments
Subject: Protecting our World

The Climate Plan looks wonderful on paper, BUT what good will it do if the people who are there to follow and enforce the plan have a personal investment in it's failure. We are failing to protect our environment. We continue to cut down our forests, allow building of housing tracts in areas which should be protected from the chemical run off and impacts they make while at the same time ignoring the fact that we have areas within our currently developed areas which could be revitalized without the huge impact to our natural world. Sadly things are not changing!

Virginia L Moore
22342 Shady Lane
Mount Vernon, WA 98274

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Tara Satushek Comment # 8

From: joan cross <joaninbhutan@yahoo.com>
Sent: Monday, October 28, 2024 6:30 PM
To: PDS comments
Subject: skagit county's 2025 comprehensive plan draft

As a resident of La Conner for 45 years, I have comments on the County's 10 year Comprehensive plan. The future demand for electricity in the county will hugely increase with demands from electric vehicles, population growth, migration population from the south coming north, air conditioning, data processing growth. Because of peak high usage for only a few hours a day, we have extra generation of electricity during other times of the day. Instead of expanding expensive new generation transmission, it seems logical to expand battery storage to use during peak times. So I am infavor of the county's comprehensive plan to favor energy storage in batteries or water heat exchange which is much more efficient than air heat exchange. Also expanding electric
vehicle level 3 chargers to accommodate not only Skagit residents but also tourist needs. PLease consider these ideas in your planning.
thank you, joan cross. 708 S. 4th St, La Conner

Tara Satushek Comment # 9

From: Nancy Shimeall <nshimeall@gmail.com>
Sent: Wednesday, October 30, 2024 3:36 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies
Attachments: Skagit Needs Battery Storage.docx

Comments for the climate element:
After reviewing the requirements for this update, and knowing the oncoming changes in climate that we need to plan for, our county needs to budget for a sustainability manager position, like several Washington counties have.

Some of the issues we should plan for in our updated comp plan:

1. Urgency of Action: reduce greenhouse gas emissions to protect public health, the environment, and future generations.

2. Renewable Energy Investments: increase investments in renewable energy sources like solar, wind, and geothermal to reduce dependence on fossil fuels. Invest in battery storage!

3. Energy Efficiency Programs: implement energy efficiency programs in buildings and transportation to lower energy consumption and emissions.

4. Sustainable Transportation: develop of public transportation, bike lanes, and electric vehicle charging stations to reduce emissions from vehicles.

5. Community Engagement: involve local communities in sustainability initiatives, provide education on energy conservation, and create local green job opportunities.

6. Climate Action Plan: create a climate action plan with clear targets for emission reductions and timelines for transitioning off fossil fuels.

7. Support for Local Agriculture: support local and sustainable agriculture practices that can reduce carbon footprints and enhance food security.

8. Partnerships and Funding: create partnerships with tribal, state and federal agencies to secure funding for climate initiatives and technology development.

9. Monitoring and Reporting: track progress on emissions reduction and publicly report results to foster accountability.

10. Resilience Planning: integrate climate resilience strategies into urban planning to prepare for climate impacts while reducing emissions.

Finally, please include this article (attached) about Skagit County's need for battery storage in my comments: https://www.laconnerweeklynews.com/story/2024/10/23/opinion/skagit-needs-utility-scale-battery-energy-storage-sites/11125.html.

Thank you,
Nancy Shimeall
Cell 360-708-4014
74 Hoh Place
La Conner 98257

Skagit needs utility-scale battery energy storage sites

Greg Whiting | Oct 23, 20240

Should Skagit County approve utility scale battery energy storage projects?

Yes. The size of the project, the type of battery and where, exactly, those projects should be located are subjects that will require public discussion. However, as their costs have fallen more than 99% over the last 20 years, large batteries have become very helpful in keeping electricity rates down. Here's why:

The American electric generation system is significantly overbuilt. There's more capacity to generate electricity than we can use, most of the time.

For instance, electric demand in northwest Washington is higher at 6:30 on a winter morning, when people get up and turn on water heating appliances and lights while electric heat is already running, than it is at 2 p.m. on a mild spring day.

To supply electricity during the "peak hours," the system needs to be built to generate more than enough (to account for transmission losses and transient equipment startup surges) for the single hour during which demand is highest.

Depending on the specific location, demand during an average hour may be a third, or even a sixth, of the peak hour's demand. During any given year, the lowest hour may only have a tenth the demand of the peak hour.

Currently, utilities rely on "peaker" generation plants to meet demand during the top 200 or so hours of an 8,760-hour year (24 hours for 365 days). Peakers are capable of operating for thousands of hours a year, but actually run for tens of hours a year. To pay for these underused assets, their operators have to charge utilities high prices – sometimes more than $10 per kilowatt-hour. A utility that has to buy energy from a peaker pays $10 for a kilowatt hour and then sells it for 13 cents. That cost eventually gets included in the average rate, and keeps rates up for everyone.

Inexpensive storage enables lower-cost generation assets that have already been built, to be used more. A battery storage system enables the utility to buy off-peak energy at normal wholesale costs of 2 or 3 cents a kilowatt-hour and store it. Sometimes, off-peak energy available in the western U.S. will include renewable energy available at near-zero cost. California is well into the process of building more solar generation capacity than it needs during some off-peak hours.

Even here in Washington, overnight wind power can be more than the grid needs. Without storage, this energy would be "curtailed." The plants would be turned off and the otherwise-almost free energy wouldn't be generated at all. A utility-scale battery allows this near-zero-cost, zero-emission electricity to be captured for use during peak hours.

If there's a hot summer or a cold winter that would require more peaker use than average, a battery storage system can pay for itself, keeping rates down for everyone, within a year or two. That's what happened with the first major utility battery system in south Australia a few years ago.

Batteries can also relieve local grid congestion, reducing the need to build new power lines and substations.

There’s been discussion about lithium batteries as fire hazards. Utility batteries will usually be lithium iron phosphate batteries, which aren’t hazardous. The lighter, higher-capacity lithium-ion (nickel, cobalt, manganese) batteries used in cars aren’t necessary for utilities, because utility batteries can be physically larger and heavier without performance consequences.

Lithium ion batteries do occasionally catch fire, but the risk is low. Some battery-powered car fires have gotten significant publicity, but the probability of a lithium battery car fire is less than 1% of the probability of a gasoline car fire. Gasoline is more flammable than batteries.

Published in La Conner Weekly News on 10/24/2024

Tara Satushek Comment # 10

From: Craig Olson <is40.col3@gmail.com>
Sent: Friday, November 1, 2024 10:37 PM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Thank you for doing this work and giving us the opportunity to submit comments!

I'm expressing strong support for all the items under #4, ENERGY CONSERVATION, GENERATION, AND STORAGE POLICY REVISIONS
Electricity is the most practical means of distributing energy from sustainable sources to users all over the county. Sustainable generation and storage facilities are new infrastructure components that significantly increase efficiency (thereby less expensive) and resilience for electrical energy - if planned intelligently. Over the last few years demonstration projects of grid-tied storage and generation have so remarkably reduced energy costs and increased resilience that they are now in high demand globally.

(Consider how freeways have benefitted the USA for many decades because they were an expensive but intelligent implementation of a much more efficient means of transportation.)

Wise planning, but actually getting it done as soon as possible is the best way to implement these changes. The S-W proposed storage facility is an example of demand preceding intelligent planning.

Do everything you can to encourage / facilitate community solar. Especially on existing roofs (private as well as public) and new apartment construction. Encourage and plan for increasing battery storage in conjunction with these, for winter storm power outages and grid stabilization.

Suggestion: Instead of using valuable rural or urban acreage for solar, encourage installation on existing and new large roofs. E.g. the Cascade Mall roof as a solar farm, tied in to nearby main transmission lines.

Don't neglect to anticipate and include in planning the increasing use of EVs, which contribute to VMT and congestion but not GHG emissions.
Personal testimonial: I've been driving a Tesla mid-size SUV locally for 4 years and 70K miles. It goes 40 miles per $1 of PSE 100% sustainable electricity, and the first dollar I spent on maintenance was new tires at 50K miles. It drives wonderfully and is the safest car on the road. Used Teslas are getting into the average price range of used cars. As more people realize the affordability, cheap O&M, and quality, count on them becoming a large contributor to GHG reduction (but not VMT).

We depend on you leaders and planners to do a good job of both. Thank you and keep going. :-)
Craig Olson

Tara Satushek Comment # 11

From: William Gregory <trailseekerwrg@yahoo.com>
Sent: Saturday, November 2, 2024 8:56 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Spam

As a decades long resident of Skagit County, I am extremely concerned about the impacts of climate change here. I am grateful that County Council is reaching out to citizens for input as to how to approach this challenging situation. Here is what I recommend :

1. **Establish an Environmental Advisory Board (EAB)**: Skagit County lacks an EAB to guide decision-making on complex environmental issues exacerbated by climate change. Establishing an EAB composed of individuals with lived and professional expertise in various environmental fields will help the County Commissioners make informed decisions based on the best available science. The EAB will report on and recommend plans, policies, and programs related to natural resources, climate preparedness, and environmental stewardship.

2. **Expand Sea Level Rise Policy Revision**: Support proposed policy CE 10.3, which includes climate change considerations in floodplain management by updating flood hazard zones using recent climate change projections.

3. **Policy Revisions for Rural Lands Conservation and Emissions Reduction**: Support various policy revisions aimed at protecting rural landscapes and enhancing natural ecosystems to support climate change resilience and reduce greenhouse gas emissions. Recommend actions include recognizing the value of conserving rural lands for carbon sequestration and planning for sea level rise by updating the Shoreline Master Program and conducting a vulnerability assessment.

4. **Energy Conservation, Generation, and Storage Policy Revisions**: Support policies emphasizing clean energy sources and identifying suitable locations for renewable energy facilities. Recommend planning for community solar arrays and clean energy installations.

5. **Forest Resource Lands Wildfire Strategy**: Support policies for reducing wildfire risks and consequences. Recommend prohibiting new development in forested areas to manage wildfire risks effectively.

6. **Multi-Modal Transportation Expansion**: Support policies to expand multi-modal transportation systems to reduce greenhouse gas emissions and vehicle miles traveled. Recommend developing non-motorized trail systems, improving safety for cyclists, and prioritizing the completion of the Centennial Trail to boost eco-tourism.

William Gregory
Sedro-Woolley

Sent from my iPad

Tara Satushek

Comment # 12

From: tdixrainier@frontier.com
Sent: Sunday, November 3, 2024 1:58 PM
To: PDS comments
Subject: Skagit Co 2025 Comprehensive planning draft policies

I am asking the county to establish an environmental advisory board. (EAB).

This board should include those who understand the best available science, professionals with experience on a variety of environmental issues such as: conservation, habitat restoration, climate science, urban planning, climate impact mitigation, environmental justice and land use decision experience. The board should also be inclusive bringing in younger persons whose future we are planning for and also include Tribal Governments.

Please support the revisions of, CE 10.3,, 10.4, CE 2.4 CE 10.5 4B-2.11.

It would also be nice to see public access to dikes for biking and walking.

Thank you for these considerations,
Sincerely,

Teresa Dix
3124 Dakota Drive
Mount Vernon, Wa 98274

Tara Satushek Comment # 13

From: LIN MCJUNKIN <mcjunkin@wavecable.com>
Sent: Tuesday, November 5, 2024 3:35 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Proposal

I've lived in Skagit County for 25 years, 1 block from the Skagit River in Conway, so I have a very personal connection to its flow and precipitation events. Since 1990, I have worked with the EPA and Nobel Prize winning IPCC scientists on issues related to climate change, so I am deeply concerned about rising sea and river levels due to extreme precipitation, increased winter streamflow, and other impacts. What we saw last winter in La Conner and Samish Island should be warning enough of more flood events to come in our area and of our need to plan for them.

Therefore, I **support the proposed revision to expand our Sea Level Rise Policy CE 10.3** to "consider climate change, including sea level rise, in our floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling."

I highly recommend that :
1- Skagit County actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years

2- A sea level rise vulnerability assessment be done and made public.

Tara Satushek

Comment #14

From: Sarah Roberts <saraharoberts@gmail.com>
Sent: Saturday, November 9, 2024 2:08 PM
To: PDS comments
Subject: Skagit County 2025 Comprehensive plan CLIMATE ELEMENT policy update

Dear Skagit County planners,

We are not where we want to be, having to make hard choices, but your well being depends on stepping up now and thinking ahead. And making the right choices now.

Please help us make sure that Skagit county is prepared as best we can for the ongoing and accelerating changes that lie ahead, in our temperatures, precipitation, flooding, drought, population changes, housing needs, pressures on infrastructure, rising costs for energy, wildfires - I could go on. All of this costs money to manage, and not planning ahead will cost more. We have to do what we can to reduce greenhouse gas emissions now, for our children and grandchildren.

Please ensure that recommendations for climate change mitigation are included, and prioritized in the comprehensive plan update, especially for education, farming adaptations, water supply protection, wildfire mitigation, energy use, electrification, shoreline security. The status quo is not going to get us anywhere, and complaining about the costs of adopting forward thinking climate policies makes us look uninformed or stupid and we will be caught with our pants down.

I'm counting on you!

Sarah Roberts
Anacortes

Tara Satushek Comment # 15

From: Mary Ruth Holder <mruthholder@gmail.com>
Sent: Saturday, November 9, 2024 4:16 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Skagit County Planning and Development Services

Via email at pdscomments@co.skagit.wa.us

Re: Skagit County's 2025 Comprehensive Plan Draft Policies, **Climate Element**

Please accept our comment on the Climate Element Draft Policies for the 2025 Skagit County Comprehensive Plan. First, we would like to thank the County's staff for their hard work on the draft Plan, including the open houses they have held and other public outreach efforts.

We are concerned, however, that the aggressive schedule that has been set for the staff has resulted in a draft Climate Element and Planning Commission meeting without the help of key information - a climate and sea level rise vulnerability assessment and relevant maps. Their absence left the Planning Commissioners and members of the public without any context about what and where the climate change and sea level rise risks are to: Skagit residents and their property, including crops and livestock; our economy; work places; public buildings and services; wildlife and natural areas. Presentations and decisions made in the absence of a thorough risk assessment document can lead to misconceptions and nay-saying about the urgent need for action to protect against climate change effects and achieve climate resilience for our county.

Climate change is upon us. We moved to Skagit County because of its natural beauty, rich farmlands, proximity to mountains and the Salish Sea, diverse ecosystems, wildlife, quality of life and, of course, its great people. The county is a national and state treasure; we cannot imagine living anywhere else. We have lived here for nearly 20 years and in that time we have experienced: changes in precipitation (heavier rainfall); hotter and erratic temperatures (for example, the record breaking heat done of 2021 that killed one of our trees and resulted in a rare insect infestation in another); flooding events and storm surges that have damaged residents' property; and smoke from increasingly wide-spreading and intensive wildfires (In 2018 a dear friend with an previously undetected respiratory condition died after inhaling unrelenting smoke from wildfires in Canada and Washington). Effective 2025 Comp Plan's Climate Element provisions are of the utmost importance to Skagit residents.

Below we describe our recommendations for one matter not addressed in the Climate Element draft policies (**item I**), as well as for specific identified provisions (**items II-VI**).

I. We request that the Board of County Commissioners establish an Environmental Advisory Board.

Going forward, an Environmental Advisory Board with appointed members having appropriate expertise and experience applying "best available science" would help County decision makers address environmental issues in light of the complex and varied ecosystems of Skagit County. Its members would

report to the Board of County Commissioners and give advice to the County Commissioners and, where appropriate, the Planning Commission. Issues that could be considered by appointed Environmental Advisory Board members include: natural resource conservation; habitat restoration; climate science; greenhouse gas emissions reduction; climate impacts mitigation; appropriate use of open spaces like bike and walking paths; protection of wildlife habitat and wildlife corridors; natural resource and environmental plans, policies, and programs (including legislation affecting natural lands, open space, water bodies and wildlife habitat); land use decisions affecting the long-term sustainability of natural processes like rivers and marine shorelines; natural solutions to improve climate preparedness; and environmental justice and environmental stewardship.

Appointed members of an Environmental Advisory Board would have lived experience, background and professional expertise to address these and other issues and would include researchers, scientists, and educators and members of under-served communities.

Other counties have created this type of Board using different names. As our county grows in population and planning decisions grow in complexity, the Board of Commissioners could call upon its Environmental Advisory Board to ensure that consistent with current County policy, the "best available science" is included in local decision making.

II. We support the draft policy revisions concerning Sea Level Rise but recommend their expansion.

We support draft policy revision **CE 10.3**, update flood hazard zones according to most recent climate change projections. But we would note our comment in paragraph 2 above concerning the need for a sea level rise vulnerability assessment and maps made available to the public to identify areas and impacts of particular risks. We recommend that Skagit County actively plan for sea level rise and climate change by updating its Shoreline Master Program within the next three years.

We also support proposed policy revision **CE 10.4** concerning shoreline stabilization. Erosion of lands associated with sea level rise is among Skagit's greatest climate change threats. Therefore we strongly recommend that you:
1.Do not classify boulders as soft armoring;
2.Require that new development be situated to avoid needing shoreline stabilization; and
3.Add language that avoids construction in tidal and storm surge areas.

III. We also support draft policy revisions for rural land conservation and reduction of carbon emissions but recommend changes.

We all know that farmlands and other rural lands as well as natural lands are treasured by our County and its residents like us. These lands are essential to our economy, well being and quality of life. The long term resilience of these lands in the face of climate change and sea level rise is critically important. Therefore we support proposed policy revision **3A(a)**'s language about protecting rural lands and identifying lands for long-term use, conservation and resilience. And we are particularly pleased that you also recognize the need for resilience and added that concept to this draft. Thank you.

We also support proposed policy revisions **6.0**, "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction" and **6.6**, "Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."

Agricultural lands and natural lands, including grasslands, forests and wetlands, play an important role in carbon sequestration. We recommend that the policies expressly recognize the value of their role. Also, we recommend policies recognizing the fact (and, sadly the experiences of many in the western United States} that wildfires are more easily managed in forests without development. Additionally, we recommend that the policies include an express recognition that grasslands, wetlands and marginal agricultural lands can help hold flood waters and thus protect homes and businesses.

We request that you delete existing policy **3A(b)** "Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities." This sentence is self contradictory. Goal 3A(b) cannot "*protect*" rural landscape by allowing an *increase* in rural housing densities. Such an increase would facilitate sprawl and allow the destruction of Skagit County's rural landscape, character, and lifestyle. And the policy would increase GHG emissions by increasing vehicular miles driven. We recommend that the County prohibit more development outside of cities, towns, and urban growth areas. Rural development will result in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services.

IV. We support energy conservation, generation and storage policy revisions and add recommendations.

The draft revision appropriately emphasizes a policy of increased use of clean energy sources and a reduction of burning fossil fuels for energy. We urge the County to plan now for clean energy installations, mapping and developing policy and code provisions concerning siting of electrical energy generation and storage facilities where appropriate. The County should identify where such facilities can be sited with the least conflict, and where they do not belong. Accordingly, we support draft policy revision **CE 2.4,** "Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."

We also support as sensible the draft policy revision **CE 10.5** that calls for "Consideration of future climate conditions during the siting and design of capital facilities to help ensure they function as intended over their planned life cycle." The implementation of this policy will prevent loss of capital facilities to climate change and sea level rise impacts and save taxpayer dollars.

We recommend that the County consider installing community solar arrays, similar to what has been done in the City of Anacortes. This allows individuals to invest in solar arrays on public buildings and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.

V. The revised Forest Resource Lands Wildfire Strategy should be expanded.

We support the proposed policy revisions **CE10.6**, "Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards" and 4B-2.11, "Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires."

As we stated in **item III** above, we recommend policies recognizing the fact that wildfires are more easily

managed in forests that do not contain development. We further recommend that the County no longer allow building in forested areas (not only because of the difficulty in managing fires in these areas but also the overall increased risk of more intense wildfires). The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where it may be impossible to defend these homes and their residents from wildfires. Other vulnerable communities are no longer allowing development in fire prone forests and wildlands.

VI. More provisions concerning Multi-Modal Transportation and Vehicle Miles Traveled are needed.

We support Proposed policy revisions **CE 7.1**, re: "expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions" and **8A-1.8**, Multi-modal transportation to "increase mobility of all users" and reduce "vehicle miles traveled and greenhouse gas emissions."

We recommend the addition of a policy revision: participate in the planning and development of multi-use non-motorized trail systems that connect towns, cities, and green spaces around them and connect rural areas to towns and cities. We also recommend a policy revision calling for the identification and mapping of roads and bridges that are dangerous for cyclists, and developing plans to make them safer by adding shoulders or bike lanes. We further support a policy revision allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners. Finally, we request a policy revision to prioritize completion of the Centennial Trail from Snohomish County to Whatcom County, being careful to avoid sensitive wildlife habitat and corridors. LIkewise a policy is needed to facilitate the development of additional trails to attract recreationists and eco-tourists like birders, which would help support the tourism economy without increasing the carbon footprint while, again being careful to avoid sensitive wildlife habitat and corridors.

Thank you for your work on the 2025 Comprehensive Plan Update and for your close consideration of our comments. Our County is facing serious challenges from climate change and sea level rise. It is time for Skagit County to adopt robust policies that will be effective in addressing this increasing threat.

Sincerely,
Mary Ruth and Phillip Holder
201 S. 7th St.
Mount Vernon WA 98274

Tara Satushek Comment # 16

From: virgene link <linkerwan@yahoo.com>
Sent: Saturday, November 9, 2024 7:05 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

To Whom It Concerns:

Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open

Tara Satushek Comment # 17

From: Ellie Cross <elliecross@gmail.com>
Sent: Sunday, November 10, 2024 12:39 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft

I am resubmitting because I forgot my full mailing address in my prior email.

Thank you for all you do! I have lived in Skagit for 7 years and love this special place so much. Both my husband and I work here and our kids go to school here. These are my suggestions:

1. Please establish an Environmental Advisory Board, composed of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners and the Planning Department look at environmental issues holistically and make decisions based on the best available science. In addition to researchers, scientists, and educators, the EAB could include younger people and underserved people so the commissioners could hear from people who do not usually have the opportunity to contribute to environmental policy planning.
2. Please support Proposed policy revision CE 2.4 "Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."
3. Please support: Proposed policy revision CE 10.5 "Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle."
4. Please support: Proposed policy revision CE10.6 "Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards."
5. Please support: Proposed policy revision 4B-2.11 "Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires."
6. Please Support: Proposed policy revision 8A-1.8 Multi-modal transportation. "Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."
7. Please consider the following: Development of multi use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities. Identify and map roads and bridges that are dangerous for cyclists and develop plans to make them safer by adding shoulders or bike lanes. Allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners. Prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. Develop additional trails to attract recreationists and eco-tourists like birders which would increase the tourism economy without increasing the carbon footprint.

Thank you so much!
Ellie Cross, Mount Vernon resident, work in La Conner

1220 s 11th st
Mount Vernon WA 98274
--
www.artworkworks.com

Tara Satushek

Comment # 18

From: Bob and Ann Hostler <rahostler@hotmail.com>
Sent: Monday, November 11, 2024 2:21 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Hello, my name is Ann Hostler. I have lived in Anacortes for 21 years, living on a sailboat for 17 years and renting in Old Town now. Skagit county is a beautiful place to live and I encourage you, with my comments, to keep Skagit a lovely county to live in for everyone. I enjoy the Anacortes forest lands and bike wherever I can including to the stores in Mt. Vernon. My concerns are 1) to support keeping farmland and protecting all rural land including stopping urban sprawl, 2) build and maintain affordable housing, 3) have affordable transportation for all including buses and safe walking and biking trails.

Following are my comments for Skagit County Climate Policies.

1. Establish an Environmental Advisory Board to assist in addressing environmental issues. The Board would be made up of people who have local experience and professional expertise on a variety of environmental issues. The Board would ensure the best available science is used
2. Support farmland and protect rural land:

   -support proposal policy revision 3A (a) - protect rural lands for long term use, conservation and resilience

   -support proposal policy 6.0 - protect and enhance natural ecosystems to support climate change resilience

   -support proposed policy revision 6.6 - protect and manage natural lands. Recognize the value of conserving rural lands

3. Stop urban sprawl by deleting existing policy 3A (b) which provides for a variety of rural densities and housing opportunities
4. Build affordable environmentally correct housing within cities close to services
5. Expand the use of Multi-Modal transportation in reducing GHG emissions

   -Support proposed policy revision 8A-1.8 Multi-Modal transportation

   -Support proposed policy revision CE 7.1 - support the expansion of employer commute reduction programs

   -Development of multi use non-motorized trail systems that connect towns and green spaces

- Identify roads and bridges that are dangerous to cyclists and develop plans to make safe
- Allow public access on dikes for bicycling and walking
- Prioritize completion of the Centennial Trail

Thank you for reading my comments.

Ann Hostler 1004 Commercial Ave., #1021, Anacortes, WA 98221 (Principal address 1609A 8th Street, Anacortes)
rahostler@hotmail.com


Virus-free.www.avast.com

Tara Satushek Climate Comment # 19

From: Mary Gleason <marygleason47@gmail.com>
Sent: Monday, November 11, 2024 3:01 PM
To: PDS comments
Subject: Skagit County 2025 Comprehensive Plan Update Comments
Attachments: Skagit County's 2025 Comprehensive Plan Draft Policies - Mary Gleason -joeg.docx

Comments from Mary Gleason enclosed as an attachment to this email. Please see below.

Thank you for the consideration.

SKAGIT COUNTY 2025 COMPREHENSIVE PLAN DRAFT POLICIES

I am Mary Gleason, residing at 1902 Highland Drive, Anacortes, WA 98221.
I have been a resident of Skagit County for 22 years and have always been an advocate for the land and its use in Skagit County. I am currently an active member of groups that advocate for Skagit County land use and the requirements that I believe are necessary and good for the county. By that, I mean sensible use of the land, such as not having climate regulations that ruin our county by such things as creating foot paths between populated areas, taking valuable farmland out of production to make these or installing unneeded solar arrays because we currently have sufficient clean, reliable hydro-electricity.

Specific recommendations:

1. **Proposed policy revision CE 10.3**
Skagit County needs to look at ways that the effects of sea level rise, winter stream flow increase and more precipitation can be lessened. Skagit County then needs plans to get these things done, such as dikes in some of the low-lying areas that flood frequently. Any Planning Committee should be made up of farmers, water and stream management experts, dike builders and estuary experts. This group would report to the County Commissioners.

2. **Proposed policy revision 3A(a)**
We need to protect the character and lifestyle of rural lands and and identify farmland which is to remain long-term as farmland.
The present trend toward "Event" venue development should be curtailed. This type of development forever removes farmland from production with the construction of roads, parking lots and buildings. “Pavement is forever.”

3. **Proposed policy revision 6.0**
Climate change is a natural and global phenomenon and any action taken by Skagit County will be money spent to no effect.

4. **Policy Revision 3A(b)**
Protect the rural land uses by not allowing communities to sprawl into the farmlands. Increase the population density by encouraging multi-family housing, revisiting height restrictions to encourage vertical development and zoning for smaller lot sizes. New communities in farmland should not be permitted
Farming is the major business of Skagit County and is the basis of our income and our quality of life.

5. **Proposed Policy Revision CE 2.4 and CE 10.5**

We do not need solar farms using up large tracts of farmland or land already in use for other purposes. We do not need large or small wind farms either.

Nor do we need to use our land for battery storage. Fires in battery storage facilities are notoriously dangerous, creating such extreme heat and toxic fumes that firemen are unable to contain them and local residents must evacuate their homes.

As stated before, we have electricity from clean, reliable sources. Think of the pollution generated by the production of lithium batteries, their inherent danger and issues and costs of their eventual disposal.

6. **Proposed Policy Revision 8A-1.8 AND CE 7.1**

We do need to study the feasibility of enhancing the mass transit bus system with more routes, buses and more frequent service with its subsequent financial costs addressed too.

Employer commute trip reduction programs should be voluntary, not mandated, for each business owner to make his own decisions.

Respectfully submitted by Mary Gleason.

Tara Satushek Comment # 20

From: melinda randles <mbrandles1120@gmail.com>
Sent: Tuesday, November 12, 2024 3:55 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I am a retired elementary school teacher, and I have been a resident of Skagit County for 57 years. The quality of life we enjoy here is due in large part to the beauty and diversity of our natural surroundings. The mountains, the rivers, the forests and farm lands, the estuaries and shorelines make our area unique, and offer a multitude of enjoyable and enlightening outdoor experiences.

I am hopeful that Skagit County's 2025 Comprehensive Plan will address current and future threats to our natural environment, especially those caused by climate change. The decisions that will be made will be based on the "best available science." As a layperson trying to understand the complexities of the decisions that must be made, I am concerned that Skagit County does not have an Environmental Advisory Board (EAB) of experts in this field to help the decision makers in addressing environmental challenges, which will only become more complex as the effect of climate change becomes more impactful to our environment.

I am recommending that an EAB be established to offer guidance and expertise as the County Commissioners and the Planning Department make the decisions which will ultimately be a part of the Comprehensive Plan. Ideally, the EAB would be made up of professionals with knowledge in a variety of environmental issues, as well as members of the public who have lived experiences, including younger people, Tribal members, and underserved people who do not usually have an opportunity to participate in environmental planning.

The EAB would report to and make recommendations to the Skagit County Commissioner on a variety of topics: water and wildlife habitat, legislation affecting natural lands, open space, natural solutions to improve long-term sustainability of natural processes like rivers and marine shorelines, environmental justice, and environmental stewardship.

In summary please consider establishing an Environmental Advisory Board to assist county decision makers moving forward with the Skagit County's 2025 Comprehensive Plan.

Thank you for your consideration.

Melinda Brown Randles
204 South 5th Street
Mount Vernon, WA 98274

Sent from my iPad

Tara Satushek Comment # 21

From: Aaron B. Katz <abkchezgarlic@gmail.com>
Sent: Wednesday, November 13, 2024 3:14 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Draft Plan Policies

Dear Skagit County Commissioners,

I am a resident of Anacortes, an avid hiker, bicyclist, and birder and member of the Board of Directors of Friends of the Anacortes Community Forest Lands (*these comments are my own* and do not necessarily reflect the views of the Friends of the ACFL).

Please accept the following comments and recommendations concerning the Climate Element of the Skagit County 2025 Comprehensive Plan Update.

The world is changing. We can see it in the headlines every day, in the wildfire smoke that more and more often envelops our lives, the fires themselves that more frequently visit us Westsiders, in the altering water cycles that threaten fish and the cultures and livelihoods that depend on them. Skagit County needs to proactively take these changes into account – for our diverse ecosystems, open spaces, and critical areas – in updating its comprehensive plan using the best available science, as county policies require.

Therefore, I recommend the following:

1. Establish an "environmental advisory council" to advise you and other county decision makers. The council should comprise those with lived experience – including people of all ages – those with technical and professional expertise in such areas as conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impact mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This council should help assure local planning consistently incorporates available science and maintain active outreach to tribal governments, county partners, stakeholder groups, and underserved community members.

2. Include proposed policy revision CE 10.3 "Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling." Skagit County should conduct, and make public, a sea level rise vulnerability assessment and actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years.

3. Make changes to policy revisions for rural lands conservation and carbon emissions reductions as follows:

a. Include proposed policy revision 3A(a),"Protect the rural landscape, character, and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience."

b. Include proposed policy revision 6.0 "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."

c. Include proposed policy revision 6.6 “Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems.”

d. Recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their critical role in carbon sequestration.

e. Delete existing policy 3A(b) “Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities.” This goal appears to allow an increase in rural housing densities, which would change Skagit County’s rural landscape, character, and lifestyle and increase vehicular GHG emissions.

f. Include proposed policy revision CE 10.4 “Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise.”

g. Require that new development be situated to avoid needing shoreline stabilization and avoid construction in tidal and storm surge areas.

4. Strengthen energy conservation, generation, and storage policies by emphasizing greater use of clean energy sources and reduced burning of fossil fuels, including proposed policy revision CE 2.4 “Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands.” The county should also consider installing community solar arrays, similar to those in Anacortes.

5. Strengthen wildfire prevention and preparedness by including proposed policy revision CE10.6 “Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards” and proposed policy revision 4B 2.11 “Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires.” In addition, the County should proactively purchase development rights to deter home building where they cannot be defended.

6. Strengthen policies to expand the use of multi-modal transportation, which can reduce vehicle miles traveled and, thus, greenhouse gas emissions, including: proposed policy revision 8A-1.8 Multi-modal transportation. “Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions” and proposed policy revision CE 7.1 “Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions.” In addition, the comprehensive plan should expand non-motorized trail systems that connect towns, cities, and green spaces around them and connect rural areas to towns and cities; identify and map roads and bridges that are dangerous for cyclists and develop plans to make them safer by adding shoulders or bike lanes; support public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners; and prioritize completion of the Centennial Trail from Snohomish County to Whatcom County.

Thank you.

Aaron Katz
1616 Georgia Place
Anacortes, WA. 98221

Tara Satushek Comment # 22

From: Leigh Agler <leigh.agler@gmail.com>
Sent: Wednesday, November 13, 2024 12:17 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Leigh Agler
1223 S 11th St
Mount Vernon, WA 98274
leigh.agler@gmail.com

Dear Commissioners,

I am very concerned about the current and future effects of climate change on our county, and how to mitigate those effects with the needs of a growing population. It is a vital question for our farming families and coastal residents, and for all residents impacted by the air and water quality affected by the increasing wildfires of the PNW. After taking a close look at the currently proposed 2025 Comprehensive Plan, I have the following comments:

1. **RECOMMEND:** Other counties have an Environmental Advisory Board; Skagit should as well. We need people with professional experience and scientific expertise to advise the board based on the best available science, not politics. This should include environmental and climate scientists and urban planners with experience with climate mitigation. The current commissioners alone (and future commissioners) cannot make these vital decisions on their own.
2. **CE 10.0-10.8 I AGREE** with revisions. Climate resilience; Drought; Land use; Sea level rise; Flooding.
    a. RECOMMEND: Update the Shoreline Master Plan to include sea level rise and climate change consistent with the Comprehensive Plan.
    b. REQUIRE any new development to avoid needing shoreline stabilization, including construction in tidal and storm surge areas.
3. **10.4 I AGREE** with proposed revision AND recommend not classifying boulders as soft armoring.
4. **CE 2.4. I AGREE** with revision. “Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands. “
    a. **RECOMMEND:** Utilize the roofs of community buildings for placement of solar power generation; i.e. schools, jails, county government buildings, parking areas. This serves 2 goals: additional power generation for the city and lowing energy costs for such facilities. If schools generated their own power, the money spent on electrical needs could better go towards educational needs.
5. **CE 3A. I AGREE** with revisions: “Protect the rural landscape, character and lifestyle by defining and identifying rural lands for long-term use.”
    a. **CE 3A(b) I DISAGREE.** An increase in rural housing densities would increase GHG emissions by increasing driving distances to schools, shopping and services.
    b. **REQUIRE** development to occur within cities, towns and urban growth areas **only.**
6. **CE 4B-2.11. I AGREE** with proposed revision with the following recommendation:

a. RECOMMEND: Ban all building in forest areas due to increased fire danger. Other communities no longer allow development in fire prone areas. This can be accomplished by a combination of county and non-profits purchasing development rights.

7. **CE 6.0-6.6. I AGREE** with proposed revisions.
   a. **RECOMMEND:** Add "Protection of grasslands, wetlands and marginal agricultural land can hold flood waters therefore protecting homes and businesses."
8. **CE 8A-1.8 I AGREE** with proposed revisions.
   RECOMMEND: Prioritize completion of the Centennial Trail from Snohomish to Whatcom counties to attract eco-tourists and recreationists without increasing carbon footprint.
   RECOMMEND: Identify roads and bridges that are dangerous to bikers and pedestrians and plan for adding shoulders, bike lanes or crossing lights as needed.
   RECOMMEND: Allow public access on dikes for bikes and walkers by creating incentives for dike districts and adjacent landowners.

Thank you for considering this input. Your process and public inclusion has been wonderful! I am SO grateful for all your blood, sweat and tears you put into this!
Leigh Agler

Tara Satushek Comment # 23

From: natalie niblack <natalieniblack@gmail.com>
Sent: Wednesday, November 13, 2024 2:48 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I have lived in Skagit County for 24 years and in that time have notice significant changes in fish populations, migratory bird populations, fewer small wildlife from snakes to chorus frogs to bees. What I see more and more of is people and traffic. The rural land, estuaries, and forests that are left need to have a higher priority than more and more people. Environmental issues must have a priority with climate change impacts at the top of the list-not just for people, but for all the other creatures that share our beautiful county. I heartily agree with these priorities:

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.
2. Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.
3. Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.
4. Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

Thank you
Natalie Niblack

Comment # 24

Tara Satushek

From: diane studley <dianestudley@gmail.com>
Sent: Wednesday, November 13, 2024 3:12 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

My name is Diane Studley. My family has lived in the Skagit Valley for 50 years. We originally settled here because of the rural character of the Valley. Thank you for giving me the opportunity to comment on the Comprehensive Draft plan as keeping the rural character of the Valley, as well as addressing climate change, are important to me and my family.

I am most interested in proposed policy revision for rural land conservation and reduction of carbon emissions. I support the change 3A(a) with the word "resilience" added.

I support proposed policy revision 6.0 to "protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG."

I support proposed policy revision 6.6 to "Protect and manage natural lands to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."

I recommend deleting existing policy 3A(b). By increasing rural housing densities, Skagit County's rural character would change and GHG emissions would increase due to vehicular miles driven.

Again, thank you for the opportunity to comment on this very extensive plan.

Sincerely,
Diane Studley
3309 Erika Lane
Mount Vernon, WA 98273

Tara Satushek Climate Comment # 25

From: tdixrainier@frontier.com
Sent: Thursday, November 14, 2024 9:43 AM
To: PDS comments
Subject: 2025 comprehensive plan climate

To the planning department,

I've been a resident of Skagit County for 18 years. I moved here because of the farmlands, the beauty of the valley and the proximity to places for beach exploration, birding, and hiking. I retired after 25 years as an environmental educator. In my retirement I have spent 13 years as a volunteer with the Skagit Conservation District as a stream team volunteer. Before that I spent 8 years as a volunteer with the Beach Watchers on Whidbey Island.

I have spent considerable time reading through the county's environmental plans for 2025 project.
As I mentioned in a previous message to the planners I would like to see the county put in place an EAB, Environmental Advisory Board. Other counties have EAB's and it is urgent in the face of climate change that Skagit county put one in place. Bring in people who are scientists, researchers, educators, professionals with a variety of expertise concerning environmental issues, especially those who understand the implications of what climate change will mean in the future for our county. The EAB should be inclusive of young persons and those from tribal governments.

The EAB should ensure the best available science in used. Policies and programs should be put in place that protect
our natural lands, our forests and wetlands, river shorelines and marine shorelines. We should absolutely do whatever is possible to protect our farmlands from development.

I would especially like to see more trails that connect. The Centennial trail in Skagit and the Burke Gilman in King county are two examples. Get the bikers and walkers off roads they now share with cars , open more dikes for the public to walk or bike on. I have friends and family who drive up to Skagit just to take in the natural beauty, the open space they have so little of in Edmonds. Many like myself come for the birdwatching, and it would be nice if there were places along our farm roads for people to pull off to enjoy the flocks of our migrating feathered friends. Or in some places just lower the speed limit so birders or tulip visitors aren't pushed down the road at 50 mph. Perhaps incentives 9tax breaks) could be given to Farmers who provide a pull out space for birders/tourists.

There have been many changes over the past 18 years I have been living here. Climate change is impacting trees in my yard, they are dying from drought or infestations. We have been incredibly impacted by wildfire smoke, keeping us inside, not out for enjoying our natural areas. There is a greater demand by people to be out and be in natural

areas, so it is most important we think about preserving/setting aside such areas for ourselves and for the animals and plants that inhabit these areas.

The need for an EAB is an urgent one and I hope the planning department will do everything possible to put one in place ASAP.

Skagit should prepare for sea level rise by updating the shoreline master program. Such as avoiding construction in tidal and storm surge areas.

Protect the rural landscape, character and lifestyle by providing for a variety of rural densities and housing opportunities. The county needs to prohibit more development outside cities, towns and urban growth areas. Rural development leads to increased greenhouse gas emissions due to frequent travel to stores and schools and jobs.

The County could also consider using more solar on public buildings, shopping mall in Burlington. It's wonderful the new Commons Center in Mount Vernon will be using solar for various purposes.

Thank you for considering my Requests, things I believe will make Skagit County a most livable place now and in the future. Thank you for the work you do each day to make a positive difference in our County.

Respectfully,

Teresa Dix
3124 Dakota Drive
Mount Vernon, Wa.
98274

Tara Satushek Comment # 26

From: dilabiog dilabiog <dilabiog@frontier.com>
Sent: Thursday, November 14, 2024 10:27 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I have lived in Mount Vernon since 2006 and very much appreciate being in farm country and enjoy he space,.. birdwatching, buying local produce, and the tulip festival to name a few reasons. I want to see the valley remain farmland. I appreciate being invited to give input.

I recommend the formation of an environmental advisory board(EAB). County policy states that decisions about our diverse ecosystems, open space and critical areas will be based on "best available science" yet Skagit County does not have an EAB to assist county decision makers in addressing environmental issues that are becoming more complex as the impacts of climate change intensify. The EAB will be composed of those with professional expertise on a variety of environmental concerns including conservation, habitat restoration, climate science, reducing green house gas emissions, climate impacts mitigation, urban planning. open space issues such as bike and walking paths, and connected wildlife corridors. Along with researchers, scientists, and educators, the EAB could include younger and underserved people who do not usually have the opportunity to contribute to environmental policy. AN EAB would report to and make recommendations to the Skagit County Commissioners.

Gena DiLabio
3124 Dakota Dfive
Moung Vernon, WA 09274

Tara Satushek Comment # 27

From: Marina King <marinakingcarpenter@gmail.com>
Sent: Thursday, November 14, 2024 12:43 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

To the Commissioners, Skagit County:
Thank you for your clear and thorough interface with the public regarding the ongoing work on the update to the Comprehensive Plan for Skagit County. As an urban planner, now retired, I firmly believe this type of regional planning is critical in order for local government and indeed our society, to move into the future in a careful and rational way. As someone who loves Skagit County's natural areas and agricultural history, I firmly believe protecting the county's natural environment and resources is critical. As someone who understands and believes what scientists are telling us about climate change, I am certain that we must act now and in successive steps into the future to protect Skagit County's environment, in order to protect jobs and the physical well-being of the human, animal and plant population. Therefore,
I would like to comment on the plan's newly published climate change provisions.

1) Appoint some form of environmental advisory board or commission that would report to the County Commissioners with recommendations about local environmental issues, to be made up of a cross section of the county's people - those with expertise in agriculture, environmental sciences and outdoor interests such as bicycling, hiking, fishing etc.

2) Expand Sea Level Rise Policy Revision to:
A. Support proposed policy revision CE 10.3 “Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling.”
B. Support proposed policy revision CE 10.4 “Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise.”
C. Recommend Skagit County actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next 3 years.
D. Recommend a sea level rise vulnerability assessment and make it public.
E. Require that new development be situated to avoid needing shoreline stabilization.
F. Add language that prohibits construction in tidal and storm surge areas.

3) Make changes to Policy Revision for Rural Lands Conservation and Reduction of Carbon Emissions to:
A. Support proposed policy revision 3A(a), "Protect the rural landscape, character, and lifestyle by defining and identifying rural lands for long-term use, conservation and resilience.
B. Support proposed policy revision 6.0, "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."
C. Support proposed policy revision 6.6, "Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."
D. Recommend recognition of the value of conserving rural lands, including agricultural lands, grasslands, forests and wetlands because of their important role in carbon sequestration. In addition,

forest lands without development are easier to manage during wildfires, and grasslands, wetlands and marginal agricultural land can hold flood waters thus protection homes and businesses.
E. Recommend deletion of existing policy 3A(b) “Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities.” Because Goal 3A(b) allows an increase in rural housing densities, which would change Skagit County’s rural landscape, character, and lifestyle. It would increase GHG emissions by increasing vehicular miles driven.
F. Recommend that the County needs to prohibit more development outside of cities, towns, and urban growth areas. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services.

4) Add to Energy Conservation, Generation and Storage Policy revisions to:
A. Support the draft revision emphasizing increased use of clean energy sources and reduction of burning fossil fuels for energy.
B. Support proposed policy revision CE 2.4, "Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."
C. Support proposed policy revision CE 10.5, “Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle.”
D. Recommend that the County consider installing community solar arrays, similar to what has been done in Anacortes. Individuals can invest in solar arrays on public buildings and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.
E. Recommend that the County plan now for clean energy installations, mapping and developing policy and code concerning the siting of electrical energy generation and storage facilities. The County should indicate where such facilities can be sited with the least conflict, and where they do not belong.

5) Expand the Forest Resource Lands Wildfire Stragegy by:
A. Support proposed policy revision CE10.6, “Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards.”
B. Support the proposed policy revision 4B-2.11 “Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires.”
C. Recommend that the County no longer allow building in forested areas, due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities are no longer allowing development in fire prone forests and wildlands.

6) Expand the use of multi-modal transportation in reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT) by:
A. Support the proposed policy revision 8A-1.8, Multi-modal transportation. “Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions.”
B. Support the proposed policy revision CE 7.1, “Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions.”
C. Recommend development of multi-use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities.

D. Recommend identification and mapping of roads and bridges that are dangerous for cyclists and develop plans to make them safer by adding shoulders or bike lanes.
E Recommend allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.
F. Recommend prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. Develop additional trails to attract recreationists and eco-tourists like birders which would increase the tourism economy without increasing the carbon footprint.

Thank you for this opportunity to comment on the County's masterplan update. Our children will thank us for taking the above steps to insure our and their future. I believe the above steps are the least we can do.
Sincerely,
Marina King
3509 D Avenue
#F3
Anacortes, WA 98221

Tara Satushek Climate Comment # 28

From: Carolyn Gastellum <cgastellum67@gmail.com>
Sent: Thursday, November 14, 2024 8:40 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

To: Skagit County Planning and Development Services

Re: Skagit County 2025 Comprehensive Plan Update - Climate Element

I have lived in Skagit County for 35 years. My husband, our three children, and I moved to Mount Vernon in 1989 and knew we had found our forever home. We have been fortunate to live in other beautiful and unique places but the mountains, the Skagit River, forests, lakes, world class farmlands, shorelines and marine environments are unparalleled for ecosystem diversity and beauty all within a fairly short distance. I am a retired teacher, having taught 5th graders at two different elementary schools in Mount Vernon and have enjoyed being a community volunteer for about twenty years with different non-profit organizations. I feel so fortunate to be part of a big community of caring, giving, and conscientious people who love the magic Skagit as much as I and our family do.

Skagit County is a place to protect. This has been done in the past and must continue into the present and future. The Climate Element for the 2025 Comprehensive Plan Update is an important opportunity to take essential actions through the establishment of viable plans and policies on environment, climate change, resilience, and greenhouse gas emissions reduction.

I strongly support:

Establishment of an Environmental Advisory Board made up of people with professional expertise in marine science, conservation, habitat restoration, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, development of bike and walking paths, and connected wildlife corridors. It is important that an EAB include climate scientists who conduct research and report reliable peer-reviewed results so that decisions utilize best available science for on-going climate policies and plans in Skagit County.
The EAB must also include representatives from tribal nations with their own environmental expertise, educators, health professionals, younger people and people from underserved communities who want to engage in helping to protect our diversity of ecosystems.

An EAB would report to and make recommendations to the Skagit County Commissioners on natural resource and environmental plans, policies, and programs. Examples include legislation affecting natural lands, open space, waters and wildlife habitat; land use decisions affecting the long-term sustainability of natural processes like rivers and marine shorelines; natural solutions to improve climate preparedness; environmental justice and environmental stewardship.

I am concerned about:

Sea level rise. It's only going to get worse, more challenging, and potentially more dangerous unless effective planning is done now. Most of us remember the major flooding event due to King Tides,

sea level rise, and significant amounts of precipitation that resulted in topping and damaging the Alice Bay dike causing major flooding of the Samish Island Road on December 27, 2022.

I support your proposed policy revisions CE 10.3 and CE 10.4. Within these policies it is important that boulders are not classified as "soft" armoring. The hard armoring using big boulders along the shoreline at Bowman Bay in Deception Pass State Park has been removed. The boulders stopped natural wave action that allowed the near shore marine environment to support forage fish and marine invertebrates that are their food source. The result of removing the boulders has been a gradual return of habitat for forage fish which are essential to the food chain to support salmon and marine mammals. Thriving salmon populations are important to local fishermen and tribal nations both economically and culturally.

As stated in CE 10.3, flood hazard zones must be updated with the most current climate change projections and modeling for floodplain management. This modeling should be made public and the County Shoreline Management Plan should be updated in the next three years. Taking King Tides and sea level rise into account is essential. New development should be away from flood hazard zones whether the flooding is caused by sea level rise or extreme winter storms and precipitation.

I strongly support:

Proposed policy revisions 3A(a), 6.0, and 6.6 regarding rural land conservation and reduction of carbon emissions. Rural lands which include agricultural lands, grasslands, forests, and wetlands are critically important for carbon sequestration. Protecting natural ecosystems throughout Skagit County, especially in rural lands is essential for climate resilience and greenhouse gas reduction.

Skagit County must prohibit more development outside of city boundaries and adjacent urban growth areas. Forest land without development is easier and less costly to manage should wildfires occur. Flood waters have a place to go when there are undeveloped grasslands, marginal agricultural land, and protected wetlands. These natural lands are not only scenic and a treasured part of Skagit County's character, they are protective, and they are areas where wildlife, plant life, insects, and birds can thrive and survive the harsher aspects of our changing climate. Protecting wildlife habitats must be prioritized.

I strongly support:

Proposed policy revisions CE 2.4 and 10.5 regarding energy conservation, generation, and storage. The recent proposed battery storage facility near Hansen Creek in rural Skagit County was denied which was a good decision. However it is increasingly important that appropriate sites for renewable energy generation and storage be identified as soon as possible. Skagit County stands to benefit greatly by having reliable renewable energy generation and storage installations built away from environmentally sensitive areas. Mapping and developing policy code for these sites should get underway.

Skagit County should identify places to install community solar arrays on public buildings similar to what has been done in Anacortes, La Conner, and Community Action of Skagit County in Mount Vernon. This is a win-win for local entities and customers who otherwise would not have access to solar energy production. Community solar arrays benefit everyone because of reduced greenhouse gas emissions from fossil fuels, cleaner air, and a healthier environment.

I strongly support:

Proposed policy revisions CE10.6 and 4B-2.11 in order to incorporate best practices to reduce risks of worsening wildfires, extreme heat, flooding and other climate accelerated hazards. I appreciate the inclusion of a Wildfire Resilience Strategy to develop a county-wide program to increase public safety and awareness about forest fire dangers and establish a reliable way to manage, reduce, and suppress catastrophic wildfires.

The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities are no longer allowing development in fire prone forests and wildlands.

I will add that the tax burdens increase for all of us when extreme climate exacerbated events like wildfires, hurricanes, drought, and flooding occur anywhere in the United States. Certainly when these events occur with our own state, we all pay the price. Skagit County could become a role model for developing reliable, actionable, and effective plans now to decrease the likelihood of loss of life, habitats, and structures due to the increasing frequency of extreme natural disasters.

I strongly support:

Expanding the use of multi-modal transportation systems to reduce greenhouse gas emissions and vehicle miles traveled. I applaud the goal to increase affordable, accessible, and reliable alternatives to the passenger car as stated in proposed policy revision 8A-1.8. Incentivizing employers and their employees to reduce vehicle miles traveled (VMT) to and from work is an effective strategy that should be implemented as soon as possible.

I really like the idea of allowing public access on the dikes once again for bicycling and walking. When we first moved to Mount Vernon it was common for people to walk along the dikes. I respect concerns that may arise from landowners who are adjacent to dikes but so many places outside of Skagit County do allow public access in cooperation with landowners. I'm sure it can be done here.

Multi use non-motorized trails systems connecting towns, cities, and rural areas are needed and would result in decreased use of driving cars between these areas. The Centennial Trail is an excellent example. It has large sections already completed from Snohomish County to Skagit County. Completing the Centennial Trail into Whatcom County should be a priority.

I would like to see increases in public transit within Skagit County. Skagit Transit buses have improved scheduling slowly but there is still a lot of unmet need. I would like to see public transportation add stops at trailheads to decrease parking congestion and make it easier for underserved communities to enjoy getting into natural areas. There are many health, social, and climate benefits to incentivize reducing the need to travel everywhere in individual passenger cars.

I truly appreciate the opportunity to comment on the draft of the Climate Element. Thank you to the staff of Skagit County Planning and Development Services for the hours you have spent organizing this process, holding open houses, and collecting, reading, and valuing public comments.

Carolyn Gastellum
14451 Ashley Place
Anacortes, WA 98221

Tara Satushek Comment # 29

From: Ken Hansen
Sent: Friday, October 25, 2024 3:03 PM
To: PDS comments
Cc: Robby Eckroth
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Good Afternoon,
Here are some comments and observations regarding your draft comp plan policies, and I'm happy to discuss if you have any questions.

Climate Policies. I was hoping to see some goals mixed in these policies. Many of the actions (such as: promote, continue to develop/support, ensure, consider, enhance, foster, align with, encourage, and seek) don't give the impression that Skagit County is serious about change in the near future and will be difficult to assess for progress. Is the County willing to more clearly advertise our 10-year goals by including some measurable tasks in the policies?

Environment Element Preliminary Policy Revisions. Actions that start with "shall be" sound mandatory, but we don't have any deadlines. How do we know these policies will be followed? On the flip side, the verb "should" appears at least 40 times in the documents and doesn't carry much weight, especially regarding development applicant requirements.

5A-1.2. Any plan to update the County's 154-page 1996 Critical Areas Ordinance that includes RCW sections that have most likely been modified?

5A-4. Including climate change in planning will have a very small effect when trying to minimize potential for flood damage, and the agencies listed aren't going to provide much assistance in this effort either. The County needs to continue working with the upriver dam owner (PSE and Seattle City Light) for our greatest tool in mitigating floods. Retention ponds or dry reservoirs are also great tools used in other locations prone to heavy rains and flash floods. The Dike Districts are another resource with a vested interest in this topic. Let's start thinking about storm water management on a much larger scale and identify areas we are willing to flood.

5A-5. First sentence covers every possibility after "should" and is a pointless statement. Recommend listing in preferred order of options with increasing fees to encourage best practices.

- Mention of enforcing compliance in applicable Skagit County ordinances, but little written about any new ordinances. When will clearing and filling and grading ordinance be executed?

Climate Change. My understanding is the Pacific northwest is the least impacted region regarding climate change with low probability of the nation's most destructive storms. Many of the proposed policies look like a template that may not always be applicable.

- Will policies only apply to county-owned assets or all residents? The state energy code has already forced the County's hand in building efficiency more than any local policy the County is willing to adopt.
- The County lacks jurisdiction in urban areas to influence tree canopies, and "strengthen economic prosperity" is a stretch on expected outcomes. Trees must be appropriate for location if non-irrigated or in full sun, so we wasting resources to water less resilient trees.
- Why no mention of fertilizer use and techniques on farmland with so much on stored carbon, stormwater, and health?

- Will the County really prioritize investments to protect homes of the most vulnerable populations with no stated population size threshold over assets required to maintain community services, health, and the local economy?
- The 100-year flood elevation has become a political topic with multiple determined elevations and the possibility of putting home owners into undeclared flood zone. I've had trouble obtaining 100-year flood elevations, so am doubtful that the County knows elevations of the 500-year floodplain to be used for relocating hazardous industries. Does this only apply to coastal regions on Puget Sound and do we know that elevation?

Climate Comment # 30

Skagit County
Agricultural Advisory Board

1800 Continental Place • Mount Vernon, Washington 98273
office 360-416-1338 • www.skagitcounty.net/planning

November 15, 2024

Planning and Development
1800 Continental Place
Mount Vernon, WA 98273

Dear Skagit County Planning Department:

The Skagit County Agricultural Advisory Board values the opportunity to comment on the 2025 Comprehensive Plan. The AAB appreciates how the Comprehensive Plan outlines the County's commitment to agriculture, keeping the protection of agricultural lands in the forefront of County policy for the duration of the Plan. Agricultural protection as an ongoing goal throughout the Plan is a key part of maintaining agricultural viability long term in Skagit County.

The AAB recognizes in the Climate Element policy CE1.6 the policy 'support for an adequate water right necessary to sustain Skagit Agriculture'. Climate predictions show as the climate changes, rainfall changes are to be expected. An adequate water right for agricultural use will be vital to maintaining the agricultural production and expansion of higher value crops grown in Skagit County. The AAB supports this section and its inclusion in other parts of the Comprehensive Plan to further this goal. An expanded water right in the county will give farmers the confidence to continue to make investments in their operations, enhancing food security in the Pacific Northwest and ensuring farm sustainability.

Thank you for considering our comments.

Sincerely,

Michael Hughes
Chair, Agricultural Advisory Board

Advisory Board Members:
Michael Hughes (Chair), Kraig Knutzen (Vice Chair), Nels Lagerlund,
Justin Hayton, John Morrison, Terry Sapp,
Steve Wright, Michael Trafton, Steve Skrinde, Kim Mower,
Cindy Kleinhuizen, Don McMoran (ex officio)

Tara Satushek Comment # 31

From: marylee chamberlain <mchamberlain07@gmail.com>
Sent: Saturday, November 16, 2024 5:26 AM
To: PDS comments
Subject: Skagit County Comprehensive Plan Draft Policies 2025

RE: Climate Element

In the recent election an overwhelming majority of voters in Washington once again demonstrated strong support for climate legislation by rejecting Initiative 2117 and reinforcing our allegiance to the Climate Commitment Act (CCA). I have personally been involved in helping my local community access CCA funds to increase resiliency for our school district and emergency management.
This county is diverse in geographic elements and activities. Including an Environmental Advisory Board (EAB) in this plan would greatly assist with representation of this county's composition and enhance successful planning and implementation.

The EAB should include stakeholders who have lived experience in this county as well as those with professional expertise on climate science and a variety of environmental issues, including habitat restoration, cutting greenhouse gas emissions, urban planning, retrofitting buildings for energy efficiency, and permitting reform. The county decision makers need factual information and research with respect to climate impacts and mitigation strategies.

This Board can advise on policies regarding overall climate protection and resilience with applications in land use, new development, solid waste management, stormwater management, air quality, transportation, energy conservation, renewable energy implementation, groundwater and natural resources

Essentially an EAB can provide an informed perspective to assist the County Commissioners and would strengthen county wide representation and efficiency. I urge your consideration of this vital component in the Comprehensive Plan.

Thank you.

MaryLee Chamberlain
La Conner
mchamberlain07@gmail.com

Tara Satushek Comment # 32

From: Paula Shafransky <pshafransky@gmail.com>
Sent: Saturday, November 16, 2024 4:53 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plant Draft Policies

Thank you for the opportunity to comment on the Environment Element and the new Climate Element.
It is important to protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.
I STRONGLY support protecting forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.
It is imperative to establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science. Science rules!

Tara Satushek Comment # 33

From: marylee chamberlain <mchamberlain07@gmail.com>
Sent: Sunday, November 17, 2024 2:04 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Thank you for the opportunity to review and provide comments/feedback on the draft plan. I have appreciated the public engagement opportunities that have been provided with this process.

I have lived in Skagit County and the La Conner area on farmland and in the town for most of my life and appreciate the unique aspects of this county with its diverse geographic elements and natural resources.

In reviewing the draft of the 2025 Comprehensive Plan I would like to request that the plan emphasize the following given the climate/environment impacts:

- Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County

- Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other

vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands. This action also helps to address the 20 % tree loss identified as a source of greenhouse gas emissions identified in the baseline GHC study.

Again, thank you for this opportunity to contribute public feedback and engage with this important planning document.

MaryLee Chamberlain
mchamberlain07@gmail.com
La Conner

Tara Satushek Comment # 34

From: colleen shannon <cashannon1952@gmail.com>
Sent: Sunday, November 17, 2024 3:07 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Skagit County Council Members,

As Snohomish County residents who spend most of our time up in your beautiful county, we would like to encourage you to take seriously the mandate to consider climate change in your comprehensive plan. Skagit County is a complex and beautiful place. With ag, shoreline, rivers, estuaries, increasing population, forests and the increasing risk of wildfires, any planning would be daunting. Climate change is real. It will impact all of the above.

I highly recommend the establishment of an Environmental Advisory Board. The issues are so complex and the players so numerous, that to serve your constituents wisely I would think you would welcome a board that would provide sound, science-based recommendations on future plans, policies and programs. An EAB would be able to focus on sea level rise, conservation, curbing carbon emissions and managing for wildfire prevention. There would be no downside to such a board.

We live near the county line but do all of our shopping and recreating in Skagit County. We are both on the board of Skagit Audubon Society. Please take action to protect the incredible mosaic that makes up Skagit County.

Sincerely,
Colleen Shannon and Jeff Osmundson
27626 65th Lane NW
Stanwood, WA 98292

Tara Satushek Comment # 35

From: Peggy Ratermann <ratermann.peggy@gmail.com>
Sent: Sunday, November 17, 2024 5:18 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

SKAGIT COUNTY 2025 COMPREHENSIVE PLAN DRAFT POLICIES

My name is Peggy Ratermann, and I have lived in the Skagit Valley for the past 30 years. I love being able to call this beautiful area home with its farmland that we cycle through, the shorelines where we regularly picnic, and the mountains trails we hike each summer. Family and friends visit each winter and are in awe of our gorgeous valley, its bald eagles, trumpeter swans, and snow geese , or the kayaking, cycling by farm stands, and tulip viewing of spring or summer. Obviously I feel the strong need to protect this valley, not only for the environment, but also for the health of all of us who live here. We live in one of the last farming areas along the west coast that has not been paved over, and we appreciate how our farmland is a far better for our native salmon than a strip mall or urban sprawl. This rich area and its people is deserving of the best available science and prevention and mitigation from climate change that is already occurring.

It is for these reasons that Skagit County must establish an **Environmental Advisory Board** with a diverse group of environmental professionals, farmers and teachers, as well as others who have experiences that are not always heard.

Creating an Environmental Advisory Board would show us that the County takes the health of this amazing area seriously and is willing to focus on the solutions we need to navigate our changing weather and landscape.

Thank you for allowing the public to be a part of this process and for the work you do to keep this valley such a beautiful place to call home.

I support the proposed policy revision CE 10.3: *"Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling."*

Sea level rise is affecting coastlines worldwide, and while our shorelines need protection, that protection should not include any form of hard armoring, including boulders. Hard armor such as boulders or seawalls may have short term protection, but also are found to disrupt food chains, reduce marine habitat, accumulate sand and sediment, and only increase erosion on nearby shores. Instead keeping development from the shoreline and allowing for a natural ebb and flow of tides will be better protection while also helping our threatened marine environment.

I support the proposed policy revision 6.6 "*Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."*

Not only will the protection of such areas increase carbon sequestration and increase biodiversity, but they are also a protection against wildfires, are naturally able to decrease the level of flooding, and protect our native wildlife, aquatic species, and provide respite for our busy lives. In other words, these areas are a tremendous financial benefit to us as well as a physical and mental benefit.

I am also recommending that the county **delete existing policy 3A(b)** "*Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities."*

Increasing rural housing density will be a detriment by changing our character, our lifestyle, and will only increase our green house gas emissions from the traffic it will bring to our rural areas. Instead the county needs to concentrate development within the cities, and not outside urban growth areas,

I support the proposed policy revision CE 2.4. "I*dentify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."*

Appropriate areas within the city could be government buildings, libraries, medical facilities, and schools.

I support proposed policy revision CE 10.5 *"Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle".*

In 2023, 8971 schools in the US had solar arrays, and I would like to see this happen in Skagit County. This is a huge financial boost for our schools as energy costs are the second largest expense in most schools, after salaries. Upfront funding for a program such as this, could come from the Inflation Reduction Act at the federal level or the Climate Commitment Act at the state level. The savings to schools would be tremendous. And, the educational opportunities could expand as students see the real time power produced by arrays, vs power consumed by each building.

I support the proposed revision CE 10.6. "*Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding, and other climate-exacerbated hazards."*

I support policy revision 4B-2.11 "*Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires."*

Recently we visited the beautiful new library in Winthrop and found the educational outdoor walk that demonstrated the firewire community to be informative in a beautiful outdoor setting. The fire wise community is a way to help citizens make their homes and neighborhoods more fire resistant and places an emphasis on what individuals can do to protect themselves from fires. Such an educational walk could be placed at a local school, the community college, or other area where the public can easily learn about this program in a quiet walk.

I also believe that building in forested areas is a danger to our forests and our limited fire personnel by having the focus on the need to save structures rather than the actual forest fire.

I support the proposed policy revision 8A-1.8 multi-modal transportation: "*Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."*

Recently a family visited, and after a lovely visit, was ready to return to the Seattle area, but I was unable to provide the transportation, which should not have been a problem. However we spent more than one hour trying to find a way to get from Mount Vernon to Lynnwood or Mukilteo, where connections were easy to find. The problem is the Skagit Valley piece. If one doesn't travel during the early morning or late in the day, it is not possible to take any form of public transportation. Hence I needed to drive to Mukilteo on a busy day. Finding a way to close this gap in the day would be very beneficial. I am sure many others have also experienced this, as well as other frustrations with not owning a car or with simply wanting to decrease one's carbon footprint.

As someone who walks more than a few miles most days, or who bicycles our roads, I find that many rural roads are lovely to ride along, or to walk. I often walk to the grocery store, which is about 2 miles each way, and while I enjoy this, it is a zig-zag path as I find roads that are pedestrian friendly and often I am stopped by slow moving trains. I am willing to do this, but I wonder about so many others who would prefer a healthier option, and one that doesn't require an auto.

I support the proposed policy revision CE 7.1 *"Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions."*

I recommend the development of multi use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities.

Skagit Valley has amazing potential to be a leader in non-motorized trails! Imagine trails that would lead tourists or locals along our farms, or into small towns, such as Edison or La Conner! Riding from Little Mountain Park to Conway, and a return via the levee with a stop for lunch in Mount Vernon would be a wonderful opportunity for everyone! A perfect example of a well used and beautiful trail is the one from March's Point to Anacortes, where we like to stop to wander through town. Another beautiful loop might be from Mount Vernon, utilizing the Kulshan trail, to Sedro Woolley and a

return by way of Burlington! While the price tag to make and connect trails might seem high, I believe that tourists from the Seattle area, out of state, or even British Columbia would love to spend time and money in this beautiful valley.

I recommend identifying and mapping roads and bridges that are dangerous for cyclists and developing plans to make them safer by adding shoulders or bike lanes.

Recently Burlington offered such a map where individuals simply inserted stickers at intersections or areas that were dangerous for cyclists. I loved allowing this type of input! With this information the county and cities would be able to focus on those areas by adding bike lanes **with some sort of separation to the car lane such as some type of stanchion or line of posts.** The recent creation of the bike lane on Burlington Blvd is wonderful and such lanes would benefit other cities as well.

I recommend allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.

It would be so wonderful to ride from Burlington to Mount Vernon and back on the levee! Traffic reduction, and therefore our carbon footprint would be reduced, as more people are able to exercise and enjoy our river. With the Burlington Levee open to the public, people find it is a wonderful way to meet friends and walk dogs, or teach children to ride bicycles.

I recommend that the county prioritize completion of the Centennial Trail form Snohomish County to Whatcom County.

This trail and other that I envisioned above would certainly benefit our economy, our physical, as well as our carbon footprint.

Again, I would like to thank the county for allowing this opportunity to participate in these critical decisions as our population grows and experiences the effects of a warming planet. The multiple ways that we manage our growth and how we maintain our rural, farming community for the next 20 years will determine if we become a thriving, healthy community where all members can live meaningful, healthy lives or a community that must endure increased traffic, sprawl, and the tensions they bring.

Sincerely,

Peggy (Mary) Ratermann
1806 Cascade Vista
Burlington, WA 98233

Comment # 36

Skagit Drainage and Irrigation Districts Consortium LLC
2017 Continental Place Suite 4
Mount Vernon, WA 98273
360.708.0344

November 18, 2024

Skagit County Planning & Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Comments "Draft Policies to the Comprehensive Plan Period Update: Climate Resiliency and GHG and Environment Elements"

Dear Planning Department,

The Skagit Drainage and Irrigation Districts Consortium LLC (Consortium) submits the following comments on the Draft Policies to the Comprehensive Plan Element Climate Resiliency and GHG Element.

Policy CE 1.5

The Consortium suggests the following revisions to the proposed policies:

"Work with dike, drainage, and irrigation improvement special purpose districts, the WSU Skagit County extension program, WSU NWREC, the Skagit Conservation District, and Skagit tribes to enhance flooding, sea level rise, and drought resilience within the agricultural sector, ensuring that farming practices, drainage, water availablity, habitat quality, and economic stability are effectively supported"

Policy CE 10.3

"Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by working with FEMA to update flood hazard maps using a risk based approach and climate change projections and updated modeling."

Policy CE 10.7

"Protect and restore existing coastal ecosystems to increase the resilience of species, habitats, and communities to climate change."

Policy CE 3.1

"Expand and bolster efforts to reduce the negative impacts of natural hazards, such as appropriate hazard identification, warning, dissemination of relevant information and data, and public outreach in coordination with the natural hazard mitigation planning process (see CE 3.3)"

Policy CE 4.2 and 6.0

Both of these policies seem partially redundance of the recommendations to develop an integrated natural resources plan to address ecosystem resilience; particularly as it relates to salmon / streams. Can these sections be revised –to align language with actionable / specific goals; for example does GHG emissions reduction mean planting trees or something else specific to natural ecosystems?

Comprehensive Plan Element: Environment

Policy 5A-4.6 (170)

"Skagit County shall continue to work cooperative with diking and drainage special purpose districts, cities, towns, state and federal agencies and tribes as needed in flood hazard mitigation planning…"

Thank you for this early opportunity to be involved in the planning process, we recognize that this is will be a long process and we welcome additional opportunities to be involved in this and other key elements of the Comprehensive Plan Update.

Sincerely,



Jenna Friebel
Executive Director. Skagit County Drainage and Irrigation Districts Consortium LLC
jfriebel@skagitdidc.org

Tara Satushek Comment # 37

From: Bob Raymond <bedrock@wavecable.com>
Sent: Saturday, November 16, 2024 9:16 AM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plant Draft Policies

Impacts on Climate Change and how to meet the county needs for clean electric energy from green and renewable sources should be a part of all significant planning decisions. It is essential that the county and regional economies be converted markedly and increasingly to electricity from clean and renewable sources.
That should include County leadership in that effort through, for example, converting County vehicles to electricity, adoption of heat pumps in new County buildings, net zero construction of County facilities.

In undertaking this objective, the County planning process should continue to protect the rural character of Skagit County by reducing residential development outside the cities.

Bob Raymond
608 S 2nd Street,
bob@svcea.org
360-421-3428

Tara Satushek

Comment # 38

From: Anne Sidbury <asidbury@gmail.com>
Sent: Sunday, November 17, 2024 5:10 PM
To: PDS comments
Subject: 2025 Skagit County Comprehensive Plan Draft Policies

Spam

Good day Planning Commission,

My name is Anne Sidbury and I've lived in Skagit County for the past 40 years. My husband and I raised three kids here and worked in the valley, he as a family physician and I as a school counselor. We've spent most of those years on beautiful Padilla Bay and have watched climate change in real time... from king tides to the appearance of white pelicans. We recently placed part of our acreage in Bay View in a restrictive covenant to protect our forest resources from future development. I would hope that the comprehensive plan addresses the loss of forestland to residential development.

Padilla Bay is just one small part of our beautiful Skagit Valley landscape. The Skagit River is, of course, its wellspring. We've seen a dramatic increase in heavy rains and damaging floods that will shape the course of our valley for decades. We must make proactive plans to protect and preserve critical lands and waters.

For these reasons, and many more, I urge the Planning Commission to create an Environmental Advisory Board to help guide you and all of us in making sound environmental decisions for our future. Both the counties to our north and south have endorsed this idea and are benefiting from the expertise of environmental advisors. Why woudn't our county do the same?

Thank you for your consideration. You have an incredibly important job in finalizing the 2025 Comprehensive Plan. I thank you for your dedication and hard work in getting this right for the sake of all Skagit County residents who live here today, and for all those who will live here tomorrow.

Sincerely,

Anne Sidbury
610 Longview Avenue
Anacortes, Washington 98221

Tara Satushek Comment # 39

From: Ingrid Hinton <ing.hinton@gmail.com>
Sent: Monday, November 18, 2024 12:15 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Polices

We are all about the expensive use of Multi-Modal Transportation in reducing Greenhouse emissions and vehicle miles traveled.

Please prioritize completion of the Centennial Trail from Snohomish County to Whatcom County and develop additional Trails to attract recreation issues and eco-tourists like borders and bikers which would increase the tourism economy without increasing Carbon Footprint.

Ingrid and Charles Hinton
22128 WA-9, Mt Vernon, WA 98274

Tara Satushek Comment # 40

From: Erbstoeszer <erbst@cnw.com>
Sent: Monday, November 18, 2024 1:14 PM
To: PDS comments
Subject: Comments regarding Skagit County 2025 Comprehensive Plan Update - Climate Element

To: Skagit County Planning and Development Services
pdscomments@co.skagit.wa.us

RE: Skagit County 2025 Comprehensive Plan Update – Climate Element

In July 1975, my husband, our young son, and I moved to Mount Vernon. It's hard to believe we've been here 49 years. We moved here as a young couple after searching for a community where we could pursue our health/ medical services careers, raise our son with good public-school systems and also live in a wonderful environment with endless opportunities for outdoor activities from the salt water to the mountains. My husband, John Erbstoeszer, MD, practiced family medicine in Mount Vernon for 35 years. I have an MHA from the U of WA School of Public Health and worked as a Health Services Consultant throughout Washington State for 40 years.

Our family has thoroughly appreciated and enjoyed all that Skagit County has to offer. Now, in retirement, we still plan to stay here and sincerely hope that Skagit County will continue be the "gem" that attracted us 49 years ago. We believe that Skagit County must take action to secure and protect its future. The Climate Element for the 2025 Comprehensive Plan Update is certainly a mechanism to take essential steps by establishing plans and policies on environment, climate change, resilience, and greenhouse gas emissions reduction.

My priorities for the Climate Element of the 2024 Comprehensive Plan Update include:

- **Establishment of an Environmental Advisory Board** including people with lived experience and those with professional expertise on a variety of environmental issues including: marine science, conservation, habitat restoration, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, development of bike and walking paths and connecting wild life corridors. The EAB should also include representatives from Tribal nations, educators, health professionals, younger people, and underserved communities. **An EAB** would report to and make recommendations to the Skagit County Commissioners on natural resource and environmental plans, policies and programs. Examples include: legislation affecting natural lands, open space, waters and wildlife habitat; land use decisions affecting the long-term sustainability of natural processes like rivers and marine shorelines; solutions to improve climate preparedness; environmental justice and environmental stewardship.

- **Adoption of Proposed policy revisions 3A(a), 6.0 and 6.6 regarding rural land conservation and reduction of carbon emissions.** Protecting natural ecosystems throughout Skagit County, especially in rural lands is essential. Skagit County must prohibit more development outside of city boundaries and adjacent urban growth areas.

- **Adoption of Proposed policy revisions CE 2.4 and 10.5 regarding energy conservation, generation, and storage.** It is important for the County to plan now for clean energy installations, mapping and developing policy and code concerning the siting of electrical energy generation and storage facilities.

- **Update the Geohazard Maps and prohibit development in areas susceptible to landslides and other hazards.** Increased rainfall, combined with the removal of forest cover, creates high risk areas where

building should be prohibited. It is important to proactively identify these areas and take action to keep the public safe.

- **Expand the use of Multi-modal Transportation in reducing Greenhouse Gas emissions and Vehicle Miles Traveled.**

    - I encourage the adoption of Proposed Policy revision 8A-1.8 regarding the planning and implementation of multi-modal transportation systems to increase mobility of all users, and provide affordable, accessible and reliable alternatives to passenger cars.
    - I also encourage the adoption of Proposed Policy revision CE 7.1 regarding the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions.
    - I recommend the development of multi-use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to town and cities.
    - I recommend allowing public access on dikes for bicycling and walking by creating incentives and protection for dike districts and adjacent landowners.
    - I recommend prioritizing the completion of the Centennial Trail from Snohomish County to Whatcom County. Also, develop additional trails to attract recreational users and eco-tourists such as birders which would increase the tourism economy without increasing the carbon foot print.

I want to thank all who have worked on the Draft Climate Element section of the 2025 Skagit County Comprehensive Plan Update. There was an amazing amount of time and effort required for organizing this process, holding open houses, collecting, reading and valuing public comments. It is a privilege to have the opportunity to comment on these important Climate Element issues which will definitely influence the future of Skagit County and its residents. I hope that my comments will be useful as the Climate Element section of the Comprehensive Plan is finalized.

I look forward to seeing the entire Skagit County 2025 Comprehensive Plan when it is completed and approved.

Marie Erbstoeszer, MHA
217 East Division Street
Mount Vernon, WA 98274
erbst@cnw.com

Tara Satushek

Comment # 41

From: Judy Farrar <judy.farrar@gmail.com>
Sent: Monday, November 18, 2024 2:37 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I am a retired mental health counselor who has lived in and loved the Skagit Valley for 52 years. I appreciate that the farmland and natural beauty of this amazing place has been largely preserved through careful planning over that time. Because of that forethought, much of the urban sprawl that has affected our state south of here has been avoided. I am grateful for all the hard work and thought that goes into planning for future growth and job opportunities, while still preserving our natural environment. I love the beauty of the Skagit Valley from hiking in the North Cascades National Park to eagle watching along the Skagit River to kayaking in the salt water.

We are all increasingly affected by global climate change that is bringing increased adverse weather events such as flooding and wildfires. As we consider planning for the future I think that the county needs to have an Environmental Advisory Board made up of people who have professional experience on a variety of environmental issues. In that way, the county commissioners and the Planning Department have access to the best available science regarding climate impacts mitigation, open space issues, habitat restoration, conservation, connected wildlife corridors and other environmental issues. This is a wonderful opportunity to apply the principle that "An ounce of prevention is worth a pound of cure." I know that people often aren't given credit when they prevent future catastrophes, but now is the time to be thinking along exactly those lines. Recently I visited the Northern State Recreational Area and learned about the Hansen Creek watershed management project that was developed to help mitigate flooding and provide habitat for salmon and other species. This is a wonderful project and an example of the benefits to our environment when we carefully plan to protect our resources. An EAB could help to ensure that careful planning always includes caring for our natural resources and mitigating the inevitable effects of global climate change.

I know that growth is going to happen. I think that we need to plan carefully to avoid urban sprawl. I would like to see all empty spaces inside town and city limits be filled in before considering development in the outlying areas. This should include planning for parks and green spaces to make towns and cities more attractive and welcoming. Bike paths and bus routes should also be enhanced and expanded. The United States has been a very car-centric nation because so much of our development happened after the invention of the motor vehicle. But people live better, healthier lives when they are able to walk and bike to their everyday activities. It also helps to foster a sense of community.

I would like to see the rural areas remain rural. I am in favor of eliminating the existing policy 3A(b) that says that "the rural landscape will provide for a variety of rural densities and housing opportunities." When people live in rural areas but work in urban areas, there is automatically an increase in greenhouse gas emissions. Let's keep development out of the rural areas and keep our fertile farmland for farming.

I would like to see the County provide for clean energy installations such as the community solar arrays, similar to what has been done in Anacortes. I support the draft revisions that emphasize the increased use of clean energy sources and a reduction of burning fossil fuels for energy, specifically, proposed policy revisions CE 2.4 and CE 10.5.

I support expanding the sea level rise policy revisions CE 10.3 and CE 10.4. I support proposed policy revisions 6.0 and 6.6 that will help reduce carbon emissions and enhance climate resilience. I support proposed policy revisions CE 2.4 and CE 10.5 to add energy conservation, generation and storage. I support policy revisions CE10.6 and 4B-2.11 to expand forest resource lands wildfire strategy, which is so important as wildfire risk grows every year. Finally I support proposed policy revisions 8A-1.8 and CE 7.1 to expand the use of multi-modal transportation systems.

Thank you for the hard work that the planning department, the planning commission and the County commissioners all do to create a wonderful place for us to live. Thank you for taking my comments into consideration.

Judy Farrar
13033 Sunrise Drive
Mount Vernon, WA 98273
360-421-6731

Tara Satushek Comment # 42

From: merna karp <mkarp1@yahoo.com>
Sent: Monday, November 18, 2024 2:59 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Please, please protect this resource rich beautiful valley for generations to come. We can't stop progress but we can harness how we benefit our economy and sustain our way of life by putting thoughtful guardrails in place. Please consider the following:

Thank you,

Merna Karp
Burlington, WA

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

2. Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.

3. Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.

4. Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

Tara Satushek Comment # 43

From: Beverly Faxon <beefaxon@gmail.com>
Sent: Monday, November 18, 2024 3:36 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Thank you for the opportunity to comment on the draft Climate Element in the Comprehensive Plan update.

This new comp plan requirement is an excellent opportunity for Skagit County to model both an appropriate response to the climate changes that we already see in our valley and to prepare us to better meet the increasing challenges that await. Skagit County can be proactive in this work, and demonstrate what local governments, using best practices, can do to protect future generations. I support a healthy, well-conceived and thorough climate element.

To help with those goals, I support the establishment of an on-going Environmental Advisory Board to provide science-based guidance as the County addresses the many climate-change related decisions that await us. At the moment, there is no board that is tasked with taking a science-based, ecological view when making county decisions, noting how all components of the valley work together and are interdependent. We have occasionally seen the confusion that has arisen when recommendations are made that do not appear to have included consultation with accepted science. The current and coming challenges of climate change don't give us any wiggle room in ignoring best available science practices.

An Environmental Advisory Board would report to and make recommendations to the Skagit County Commissioners on natural resource and environmental plans, policies, and programs. Examples include legislation affecting natural lands, open space, waters and wildlife habitat; land use decisions affecting the long-term sustainability of natural processes like rivers and marine shorelines; natural solutions to improve climate preparedness; environmental justice and environmental stewardship. Those on the board could bring professional expertise in areas like climate science, urban planning, conservation and greenhouse gas emissions. Members might also be chosen for their ability to represent the lived experience of a range of valley residents around these and other environmental issues. The key would be a diversity of viewpoints, informed by the best available science.

In addition to the establishment of such a Board, I will also comment on the following:

I support addressing the inevitability of sea level rise. The unaddressed effects of sea level rise could be devastating for the valley. Given this, I support revision CE 10.3 and CE 10.4 (with the specification that boulders not be classified as soft armoring).

I support policy 3A(a), and I appreciate the inclusion of the quality of "resilience." I advocate deleting existing policy 3A (b), which would allow an increase in rural housing densities, changing the valley's rural character and increasing greenhouse gas emissions due to increase commuting. We need to clarify our county intent not to put development on rural lands. This intent was clearly expressed by the public during the discussion of fully contained communities.

I also support proposed policy revisions CE10.6 and 4B-2.11. Along with the rest of the Valley, I have already experienced the effects of wildfire smoke—the health hazards, the need to monitor and reduce outdoor activities, the disruption to tourism activities, the toll on wildlife. This climate change outcome is upon us. In just a few decades, we saw fire become a yearly occurrence on the east side of the Cascades, and now we regularly see it just up Highway 20 in the North Cascades. We ignore planning for fire and smoke, and trying to reduce its likelihood, at our peril. In addition to these proposed revisions, I support no longer allowing the construction of new homes in forested areas. Additional building in this area increases the vulnerability of our communities and our forests, and is not sustainable.

Thank you.

Beverly Faxon
20757 Anderson Road
Burlington, WA 98233

Tara Satushek Comment # 44

From: Nancy Shimeall <nshimeall@gmail.com>
Sent: Monday, November 18, 2024 4:05 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I live on Fidalgo island on Swinomish land. I also am a forest landowner in East Skagit County.

This comment is regarding the update to the comprehensive plan. By now you know that our state climate commitment act was upheld by a strong majority. This makes it clear that our citizens understand that we must act to curb our contributions to the problem.

This update to the climate element of our county comprehensive plan is crucial.

Out of concern about what we have seen so far in this process, I urge you to establish an Environmental Advisory Board to ensure the most balanced and research-based approach. This EAB would be made up of people who have lived experience and those with professional expertise on climate science and a variety of environmental issues, including habitat restoration, cutting greenhouse gas emissions, urban planning, retrofitting buildings for energy efficiency, and permitting reform. The county decision makers need factual information as well as research on successes in other jurisdictions. This will help inform the Commissioners and provide a balanced source of recommendations along with the perspective of the Planning Commissioners who have expressed their reservations about the requirements of this climate element.

Our county should look at environmental issues holistically and make decisions based on the best available science. The majority of citizens understand this time of urgency in taking action to protect what we love about our county.

Please include an Environmental Advisory Board as we move forward with this crucial update on the climate element. It is our obligation to provide the best outcomes for Skagit County today and a legacy for future generations.

Thank you,
Nancy Shimeall
74 Hoh Place
La Conner, WA
360-708-4014

Tara Satushek Comment # 45

From: A Lynn <aimeelynncreates@gmail.com>
Sent: Monday, November 18, 2024 4:38 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Regardless of politics, climate change is affecting us exponentially more each year and as a Skagit County resident, I've seen how crazy the weather is getting and affecting myself, my neighbors, and my community. We deserve a more concentrated focus on our climate instead of it being a tiny part of the comprehensive plan. Without a healthy environment here in Skagit County, costs for everything else will skyrocket. With that, I join my neighbors in requesting the following:

1. **Establish an Environmental Advisory Board.** The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.
2. **Protect the rural character of Skagit County by reducing residential development outside the cities.** Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.
3. **Protect forest lands from conversion to residential use.** The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.
4. **Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards.** Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

And with all of this, there needs to be a stronger, more comprehensive outreach to all residents to get their feedback on the plan…not just to social media followers or members of certain groups. Engagement is VITAL to ensure the needs of ALL residents are met…not just the more actively engaged. Getting volunteers and/or staff out on the streets talking to neighbors on their turf? That would be huge.

Thank you,
Aimee & Daniel Levens
Mount Vernon, WA

Tara Satushek

Comment # 46

From: Harold Lee <hhlee@frontier.com>
Sent: Monday, November 18, 2024 5:00 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

1. Recommend establishing an Environmental Advisory Board made up of people who have both professional and lived experience in environmental issues, including conservation, habitat restoration, climate science, climate impact mitigation, urban planning, connected wildlife corridors, bike and walking paths etc. This would help the County Commissioners and Planning Department look at environmental issues and make decisions based on best available science.
The EAB would report and make recommendations to the Skagit County Commissioners on natural recourses and environmental plans, policies, and programs.

2. Support Proposed policy revision CE 10.3 "Consider climate change including sea level rise, extreme precipitation, increased winter stream flow, and other impacts, in floodplain management planning by updating flood hazard zones according to the most recent climate change projections and modeling.
Skagit County should actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years.
A sea level rise vulnerability assessment should be done and made public.

Support Proposed policy revision CE 10.4 "Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to project sites from wave driven erosion or flooding by sea level rise."
Do not classify boulders as soft armoring.
Require that new development be situated to avoid needing shoreline stabilization.
Add language that avoids construction in tidal and storm surge areas.

3. Make changes to policy revision for rural lands conservation and reduction of carbon emissions.
Support: Proposed policy revision 3A (a) "Protect the rural landscape character and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience."
Support: Proposed policy revision 6.0 " Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emission reduction."
Support: Proposed policy revision 6.6. "Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."
Recommend: Recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their important role in carbon sequestion. In addition, forest lands without development are easier to manage during wildfires, and grasslands, wetlands, and marginal agricultural land can hold flood waters, thus protecting homes and businesses.

Delete existing policy 3A(b) "Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities.
The county needs to prohibit more development outside of the cities, towns, and urban growth areas. Rural development will result in increased greenhouse gas emissions due to frequent travel for schools, shopping, job, and essential services.

4. Add to energy conservation, generation, and storage policy revisions.
Support: the draft revision emphasizes increased use of clean energy sources and reduction of burning fossil fuels for energy.
Support: Proposed policy revision CE 2.4 "Identify areas in the County that are appropriate for siting renewable energy and storage facilities and prioritize protection of Natural Resources Lands."
Support: Proposed policy revision CE10.5. "Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle."
The county should consider installing community solar arrays, similar to what has been done in Anacortes.
The county should plan now for clean energy installations, mapping and developing policy and code concerning the siting of electrical generation and storage facilities. The county should indicate where such facilities can be sited with the least conflict, and where they do not belong.

5. Expand Forest Resources Lands Wildfire Strategy.
Support: Proposed policy revision CE10.6 Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards."
Support: Proposal policy revision 4B-2.11 "Wildfire Resilience Strategy. Development a comprehensive, county wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing , reducing and suppressing catastrophic wildfires."
The county should no longer allow building in forested areas due to the increased risk of intense wildfires. The county could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires.

6. Expand the use of multi-modal transportation in reducing greenhouse gas emissions (GHG) and vehicle miles traveled.
Support: Proposed policy revision 8A-1.8 Multi-modal transportation. "Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."
Support: Proposed policy revision CE7.1. "Support the expansion of employer commute trip reduction (CTR) programs to include both large and small business across various jurisdictions.
Recommend development of multi use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities.
Identify and map roads and bridges that are dangerous for cyclists and develop plans to make them safer.
Allow public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.
Prioritize the completion of the Centennial Trail from Snohomish County to Whatcom County.

Thank You,

Harold & Hella Lee
2500 S. 18th St.
Mount Vernon, Wa 98274

Tara Satushek Comment # 47

From: zakblum <zakblum@frontier.com>
Sent: Tuesday, November 19, 2024 2:04 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Planning Department,

Thank you for your dedication and attention to planning the future of Skagit County. Please consider my comments on the 2025 Comprehensive Plan Policies Draft. My husband and I are both retired Registered Nurses who have lived in Skagit County since 1972 working most of our 30 plus year careers at Skagit Valley Hospital. The natural beauty and sense of community here have sustained us for all of these years. As the county reviews the 2025 Comprehensive Plan, I wanted to voice my support of a strong commitment to our beautiful environment by protecting our rural landscape and precious agricultural land. I strongly support the prohibition of development outside of cities and towns, including planned contained communities. I believe the County Commissioners should be guided by those with expertise on environmental issues who can provide information that reflects the value of preservation of agriculture, recreation and sensible development, not short term economic gain. The decisions of today will have impact on the quality of life we so dearly appreciate in Skagit County. Thank you for your time.

Sincerely,
Alison Zak
14830 Baker Heights Road
Mount Vernon, Wa 98273

Tara Satushek Comment # 48

From: bullman31971@gmail.com
Sent: Tuesday, November 19, 2024 2:03 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Skagit County is a terrific place to live. My sincere thanks to all the public servants and their supporters who work to protect our county. The Comprehensive Plan Update is an opportunity to continue and advance that work. Here are my comments.

^ County policy states that decisions about our complex ecosystems will be based on "best available science", yet Skagit County does not have an Environmental Advisory Board (EAB) to assist county decision makers in addressing environmental issues that are made increasingly complex as the impacts of climate change intensify.

We should establish an Environmental Advisory Board to report to the Commissioners and/or the Planning Department so we can ensure the best availably science is employed in Skagit County.

^ Proposed policy revision CE 10.3 should be adopted to actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years.

^ Proposed Policy revisions 3A(a) and 6.0 and 6.6 should be adopted to recognize the value of conserving rural lands and especially wetlands because of their important role in carbon sequestration.

^ The draft provisions regarding increased use of clean energy sources and reducing burning of fossil fuels should be adopted including Proposed policy revisions CE 2.4 and CE 10.5.

^ Encourage development of multi-use non-motorized trail systems the connect our communities and attract recreationists.

Thank you for your time and consideration, and your work for our communities.

Carl Ullman
5162 West Shore Road
Anacortes, WA 98221

Tara Satushek

Comment # 49

From: lhoplhop@comcast.net
Sent: Tuesday, November 19, 2024 4:06 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Skagit County Planners,

I'm a senior resident of Skagit County who actively volunteers to make our community better. This is the first time I'm submitting comments to the Planning Commissioners.

I'm so pleased that the impacts of climate change are finally being included in our county's Comprehensive Plan. Anybody who's my age and has lived in the area all their life as I have can bear witness to the fact that our climate has changed. And it's continuing to change rapidly. There are many areas in our county that are at increasing risk for tidal surges, river flooding, flooding from rain and snowstorms, windstorms, changes in tree canopy and vegetation, extreme heat events and wildfires. These heightened risks are due to human-caused climate change. Our Skagit County planning needs to address and mitigate these growing risks.

I'm also glad to see that sea-level rise is finally being addressed in our planning. The unprecedented flooding in recent years in Samish Island, Bow-Edison and other areas illustrate the problem. I will never understand why the most recent update of the Shoreline Master Plan didn't address sea-level rise. This oversight needs to be rectified.

Recommendation:
Amend Skagit County's current Shoreline Master Plan within the next two years to address and plan for sea-level rise and other risks due to the changing climate in the area.

Those with direct commercial and financial interests in planning matters make every effort to communicate their views to county planners. The Planning Commissioners would be better served by ensuring they hear other viewpoints and concerns too. An Environmental Advisory Board is the best way to do this. Having occasional hearings that are open for public comment are not enough.

Recommendation:
Create an Environmental Advisory Board to help the county Planning Commissioners and the planning department make decisions that are informed by science, environmental expertise, and the needs and concerns of our diverse citizenry. This advisory board would provide a more balanced approach to planning.

In general, I strongly support the Climate – Element policy revisions reflected in the draft Comprehensive Plan, and they are a good start.

In the Zoning and Development Sector, there were many good policy revisions to address climate resilience, but nowhere did I see a policy for actively informing citizens of the climate risks in the areas where they live, work and recreate. We need clear risk maps for flooding, windstorms, and wildfires.

Recommendation:
Create clear risk maps of flooding, windstorms and wildfires for the entire county and make these maps very accessible to the public. They should be easy to find on the county website and should be communicated periodically to citizenry in different ways that take into account the various ways people are most likely to see information such as social media, newspapers and posting in public spaces.

In the Zoning and Development Sector, I especially support policy CE 10.7 that calls for protecting and restoring coastal ecosystems to increase the resilience of species, habitats, and communities to climate change. This is a very good policy and should be enacted.

In the Zoning and Development Sector, I see a specific policy statement, (CE10.8) that addresses where residential and commercial development should be located, or how it should be designed (to withstand 100-year flood events,) but **nowhere do I see a similar statement that addresses where development should be located to mitigate losses from wildfire.** This appears to be a serious oversight.

Property owners often argue that they should have the right to build on their property even if the property is located in an area that has significant risks for wildfire. They argue it's their property and their risk. But that's not true. When a wildfire happens, it takes public resources to fight it**. The growing risk of wildfire is taking an ever-increasing share of our public resources. Fighting wildfires is much more difficult when there are residential and commercial structures in harm's way.** I don't want my tax dollars spent to mitigate a risk someone else foolishly decided to take in building where they shouldn't have.

The absolute best way to mitigate wildfire risk in public planning is to have policies that prohibit building in higher-risk areas in the first place. Why is this missing from the comprehensive plan?

Recommendation:
Add a policy statement in the Zoning and Development Sector – Climate Element that states the following… **Ensure all residential and commercial development and accessory uses, port and industrial facilities, equipment, and works are sited in areas that do not have a significant risk of wildfire. Incorporate climate projections to account for anticipated changes in wildfire frequency and intensity. Ensure that zoning and development policies are updated periodically in accordance with these projections to reduce losses from wildfire and enhance public safety and long-term resilience against evolving climate impacts.**

In the Building and Energy Sector, policy CE 2.4 calls for identifying areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands. Missing from this policy statement is language that addresses public health and safety concerns.

Recommendation:
Extend the last sentence in policy CE 2.4 to add the following…**and public health and safety.** Then add an additional sentence that reads… **Renewable energy generation and storage facilities should be located in commercial or industrial areas that mitigate fire risk and noise pollution impacts to residential areas.**

In the Economic Development Sector, **I would like to see a stronger policy statement in support of rooftop solar.** This is such an untapped resource for clean energy generation. Rooftop solar doesn't take away agricultural lands, it doesn't require clearing forests or other wildlands, it merely uses existing hardscape and developed property for producing needed energy. After initial installation costs and a little bit of ongoing maintenance, it's free energy from the sun. Policy CE 5.1 show discussion of rooftop solar in the last column for reasoning behind a proposed policy change, but I think it should be a specific policy priority. I would like to add rooftop solar to my home but I live on a tight budget and could use a little help from my local government.

Recommendation:
Add a policy statement to the Economic Development Sector – Climate Element that reads…**Support the development of rooftop solar in the County in both residential and commercial areas to provide energy to the region in a manner that mitigates negative climate impacts by reducing greenhouse gas emissions from energy production.**

I strongly support the policies as drafted in the Land Uses & Ecosystems Sector.

Thank you for the opportunity to comment on these proposed policy changes that address the impacts of climate change in our county.

Best regards,

Lisa Hopkins
4914 New Woods Place
Mount Vernon, WA 98274



Virus-free.www.avast.com

Tara Satushek Comment # 50

From: Heidi Epstein <heidiep@gmail.com>
Sent: Tuesday, November 19, 2024 6:15 PM
To: PDS comments
Subject: Skagit County 2025 Comprehensive Plan Draft

To Whom It May Concern,

As a long time resident of Skagit County I am concerned about the effect of climate and how we will respond to the needs it may require.
Please consider the following:
• Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

• Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.

• Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.

• Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

Thank you very much for your time and devotion, Heidi Epstein
16703 Beaver Marsh R.
Mt. Vernon, WA 98273
360 941 0472

Tara Satushek Comment # 51

From: Richard McKay <mckay@wavecable.com>
Sent: Tuesday, November 19, 2024 7:34 PM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Commissioners,
Skagit County has been my cherished home since my husband and I married forty seven years ago. He was born and raised here as was his father. Our children, and now our grandchildren are growing up and living their lives here as well. For thirty one years, working as an RN at our hospital, I helped new families grow as a labor and delivery nurse. I am commitment to participate in this process to preserve and protect this incredibly unique and diverse place we call home. The gift of nature's beauty surrounds us in the ocean, the rivers, the mountains, the forests, wildlife and the farmland at our door. We have a caring community that is rapidly growing. Protecting and maintaining the beauty of our county is vital.

To bring qualified science based knowledge into decisions regarding our county, I recommend that an Environmental Advisory Board be established. It could be made up of people who have professional expertise on a variety of environmental issues such as conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning , open space issues like bike and walking paths and connected wildlife corridors. Researchers, scientists, educators, tribal members, young people and underserved people could be part of the Environmental Advisory Board using the best available science to advise the County Commissioners and County Planning Department. Using their expertise would help advise the Commissioners on legislation affecting natural lands, open space, waters, and wildlife habitat and land use decisions affecting the long term sustainability of natural process like rivers and marine shorelines. They can advise on solutions to improve climate preparedness, and environmental stewardship. I strongly recommend that an Environmental Advisory Board be formed and sustained with the experts, scientists and community members.

I strongly support protecting the rural character of Skagit County by reducing residential development outside the cities. Greenhouse gas emissions would increase if development outside the cities grows due to frequent travel for schools, jobs, shopping, and essential services. Protecting our valuable rural lands including, agriculture, forests, wetlands is vital. They play an essential role in carbon sequestration making it imperative that we protect them. Conserving wetlands, grasslands and some farmlands can hold floodwaters protecting homes and businesses from flooding. Protecting our forestlands and keeping them without development will make wildfires easier to manage.

I do not support existing policy 3A9b) "Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities." and recommend that portion be deleted. Goal 3A allows an increase in rural housing densities which would change Skagit County's rural landscape, character and lifestyle. It would increase greenhouse gas emissions by increasing vehicular miles driven. I recommend the County prohibit more development outside of cities, towns, and urban growth areas.

Expanding the use of multi-modal transportation will reduce greenhouse gas emissions and vehicle miles traveled. I support developing of multi use non-motorized trail systems that connect towns,

cities, and green spaces around them and also connects rural areas to towns and cities and making designated bike lanes on shoulders of roads to allow for safer transportation using bicycles.

Thank you for your attention to the issues I feel have the greatest import moving forward in planning to protect and maintain our beautiful Skagit County.

Sincerely, Eiren McKay
22953 Bumblebee Lane
Mount Vernon, WA 98273

Tara Satushek Comment # 52

From: Anne Middleton <anne.jackm@gmail.com>
Sent: Wednesday, November 20, 2024 2:52 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

First of all, thank you for already incorporating ideas from public meetings into this process and for engaging the community to make further comments on local impacts of climate change.

The following are the proposals we would like to urge the County to adopt.

1. Recommend the establishment of an Environmental Advisory Board (EAB).

Our county includes many widely diverse habitats — estuaries, farmlands, urban areas, and mountainous terrain. County policy states that decisions about these complex areas will be based on "best available science". As the impacts of climate change intensify, county decisions need assistance from citizens well-versed in these sciences — Skagit Consortium of Climate Scientists, Tribes, SVC environmental instructors, fishers, urban planners, Land Trust staff, Skagit Fisheries Enhancement Group staff, citizens who have worked on environmental issues in the county. The way has been led by counties to the north and south, so the pattern to proceed is well set.

The EAB would report to and make recommendations to the Skagit County Commissioners on plans, policies, and programs. These might include legislation affecting natural lands, open space, waters and wildlife habitat; as well as land use decisions affecting the long-term sustainability of natural processes like rivers, and marine shorelines; natural solutions to improve climate preparedness; environmental justice, and environmental justice.

An EAB could ensure that best available science is consistently included in local planning. It could maintain active outreach to county partners, stakeholder groups, tribal governments, and underserved community members.

2. Expand Sea Level Rise Policy Revision

We support the proposed policy revision **CE 10.3**

Living in Bay View and traveling frequently to Samish Island and through Edison we endorse the county actively plan for sea level rise and climate change by updating the Shoreline Master Plan in the next three years.

Publishing a sea level rise vulnerability assessment for county residents is needed.

We also support policy revision **CE 10.4.**

3. Make changes to policy revision for rural lands conservation and reduction of carbon emissions

We support the proposed policy revisions **3A(a)**

6.0
6.6

We do **not** support existing policy **3A(b)** which would allow an increase in rural housing densities which would change Skagit County's rural landscape, character, and lifestyle. This policy also increases GHG emissions by increasing vehicular miles driven.

We feel growth needs to be concentrated in our established communities, towns, and cities.

4. Add to energy conservation, generation, and storage policy revisions.

We support **CE 2.4**
CE 10.5

Several of us in the Bay View neighborhood went together to install at the same time solar arrays. We know first hand how beneficial these are to individuals and communities like Anacortes.

5. Expand Forest Resource Lands Wildfire Strategy

We support **CE 10.6**
4B - 2.11

In these times of more frequent high temperatures paired with low humidity the perfect conditions for explosive fires are created as we have witnessed in the North Cascades, Alberta, British Columbia, Oregon, and California.

We discourage the County allowing further building in forested areas. As is being done in other vulnerable communities, this could be achieved by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires.

6. Expand the use of multi-modal transportation in reducing greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

We support **8A-1.8**
CE 7.1

We recommend that roads and bridges dangerous for walkers, riders, and rollers be identified and that clearly separated and identified lanes be created. Also, we recommend installing crossing signals and lights to safeguard walkers, riders, and rollers.

Our family of cyclists encourages the completions of the Centennial Trail from Snohomish County to Whatcom County and the development and periodic maintenance of additional trails which would attract recreationists, eco-tourists, and birders without increasing the carbon footprint.

And we support creating incentives and protections for dike districts and adjacent landowners in order to allow public access on dikes for bicycling and walking.

Again, thank you so much for providing the community an avenue to communicate our wishes for our county. Thank you for your many hours of work — past, present, and yet to come!

Anne Middleton (and Jack Middleton as well)
12694 Josh Wilson Rd
Mount Vernon, WA

360-757-6960

anne.jackm@gmail.com

Robby Eckroth Comment # 53

From: Judy Baker <judyrbaker15@gmail.com>
Sent: Wednesday, November 20, 2024 5:06 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I have lived, worked and raised my family in the Skagit Valley for over 50 years.
The fertile, rural nature of this beautiful area makes it a unique place for farming, recreation, tourism and wildlife.

I am hopeful that Skagit County's 2025 Comprehensive Plan will address current and future threats to our natural environment, including those caused by climate change.
As a mountain hiker and climber I have seen firsthand the effects of our warming climate---most especially in the recent dramatic recession of the glaciers in the North Cascades.

There is much scientific research going on as to the causes of climate change and how it will affect our future and that of our children.

It is my hope that the Skagit County Commissioners will appoint an Environmental Advisory Board, including professional climate experts and interested members of the public to advise them on policies to protect our area.This will help the County Commissioners and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

Thank you for your consideration.

Judy Baker
1504 Alpine View Place,
Mt Vernon WA 98274

Comment # 54

Main Office: 360.466.3163
Facsimile: 360.466.5309

Swinomish Indian Tribal Community

A Federally Recognized Indian Tribe Organized Pursuant to 25 U.S.C. § 476
* 11404 Moorage Way * La Conner, Washington 98257 *

November 21, 2024

Skagit County Planning and Development Services
1800 Continental Place
Mount Vernon, WA 98273
Via email: pdscomments@co.skagit.wa.us

Subject: Comments on 2025 Skagit County Draft Comprehensive Plan Environment and Climate Policies

Dear Planning and Development Services,

The Swinomish Indian Tribal Community ("Swinomish" or "Tribe") submits the following comments on Skagit County's 2025 Draft Comprehensive Plan (Draft Comp Plan) Environment and Climate Policies. The Swinomish Tribe recognizes the importance of resilience planning, environmental protection, and sustainable development, and is a longtime leader in advancing these priority policy matters. Given the Tribe's unique vulnerability to climate impacts, and our cultural and ecological connection to the Skagit watershed, we reemphasize the need for the County to adopt and implement clear, actionable, and science-based policies to address climate change, environmental conservation, and the meaningful protection of natural resources in Skagit County.

These comments are in addition to those we submitted to the Board of County Commissioners regarding the County's Shoreline Master Program update (SMP) in June 2021, March 2022, during public testimony in the spring of 2023, as well as in a follow-up technical memo later that year. We would like to reiterate the critical concerns raised in those letters and remind the County of the numerous scientific resources and literature we provided, which should be incorporated into the County's planning documents. Most of the issues the Tribe raised regarding the SMP, including the need for specific enforceable measures, science-backed standards, and protection of critical habitats, remain unresolved in these Draft Comp Plan policies. In order for the Draft Comp Plan to meet applicable requirements it must be updated to address the following:

- Need for Specific, Enforceable, Science-Based Measures
- Lack of Alignment with the Shoreline Master Program
- Failure to Meet No Net Loss Standard and Requirements
- Failure to Ensure Mitigation is Adequate and Completed
- Inadequate Protections for Riparian Habitat Areas
- Numerous Draft Climate Change and Environmental Policies

Swinomish Tribe's Treaty Rights and Interests Throughout the Skagit Basin

Swinomish has been the primary steward of the Skagit River and north Puget Sound since time immemorial. Fish and fish habitat are crucial to the cultural, spiritual, subsistence and commercial activities of the Swinomish Tribe. The Tribe exercises Treaty-reserved fishing rights in their "usual and accustomed" fishing areas (U&As), which include an extensive portion of marine waters of the northern Salish Sea, the entirety of the Skagit River watershed and all its tributaries, as well as the Samish River system. The Tribe's Treaty-protected fishing, hunting and gathering rights also extend throughout the Skagit River basin and coastal areas affected by the Draft Comp Plan, among other places. These habitats, integral to the Swinomish culture and the broader ecosystem, must be safeguarded in all County planning efforts. We acknowledge the County's inclusion of climate change impacts and resilience measures in the draft; however, the draft policies lack the necessary detail, enforceability, and actionable measures required for effective resilience. Below, we outline specific recommendations, noting that we continue to have similar and overlapping concerns with the County's SMP that must also be addressed.

Need for Specific, Enforceable, Science-Based Measures

The Draft Comp Plan covers a broad range of policy areas, but remains overly general and aspirational. The draft lacks clear implementation measures, data-backed standards, or any detailed timelines for implementation. The County needs to clarify how the Draft Comp Plan will satisfy the new climate change and resiliency requirements of House Bill (HB) 1181, including alignment with the Shoreline Master Program (SMP) to provide cohesive protection for interconnected ecosystems, particularly those that support Skagit River salmon populations.

Specifically, HB 1181 directs that the "resiliency sub-element must, among other things, equitably enhance resiliency to, and avoid or substantially reduce the adverse impacts of, climate change in human communities and ecological systems through goals, policies, and programs consistent with the best available science and scientifically credible climate projections and impact scenarios". Skagit County's natural resource-based economic sectors, ecosystems, water resources, infrastructure, emergency management, and public health all face climate change related risks in the future. The County should consider potential long-range climate change implications into its on-going functional planning and implementation actions. As a first step towards this, the County should: 1) study the resilience of its natural and built environments to

the potential impacts of climate change; 2) identify the relative vulnerability of these sectors to climate change; and, 3) examine the adaptive capacity of these sectors to cope with or mitigate climate change.

There are many published online resources authored by the Department of Ecology, Washington Sea Grant, the University of Washington Climate Impacts Group, NOAA, Skagit Climate Science Consortium, and others that include scientific analyses specific to coastal Washington and Puget Sound, all of which represent the most current, accurate and complete science. Many of these publications are specifically geared toward planners and local governments. We encourage the County to ground their revised environmental and climate policy sections in these bodies of work.

Lack of Alignment with the Shoreline Master Program (SMP)

Skagit County's Draft Comp Plan Environment Element does not adequately include or reference elements of the County's SMP. As a result, the draft Element does not meet the requirements of the Shoreline Management Act in regards to Standards for Shorelines of the State and Standards for Shorelines of Statewide Significance. The County must clarify how the Draft Comp Plan will integrate the SMP, as we emphasized in our March 2022 SMP comments, to provide cohesive, science-backed protections across land and shoreline interfaces. As the guiding document informing growth-related objectives and goals in Skagit County, the Draft Comp Plan update must incorporate the applicable climate and resiliency elements of the County's SMP in order to ensure that County policy aligns with the requirements of the Shoreline Management Act. Given the interconnected nature of land-use and shoreline policies, the County must clarify the documents to ensure consistency and support for the SMP's objectives.

Failure to Meet No Net Loss Standard and Requirements

Environmental policies in the Draft Comp Plan need to be strengthened to adequately meet the No Net Loss (NNL) requirement. While we appreciate the addition of NNL language in 5A and 5A-5.1, subsequent language weakens NNL policy and fails to reflect that NNL is a requirement of the Shoreline Management Act, not an optional recommendation. Furthermore, the Draft Comp Plan does not support NNL policies with guidance or reference for how NNL will be defined, quantified, monitored, and enforced. Despite NNL requirements of the Shoreline Management Act, losses of critical wetland and shoreline habitats continue as a result of permit variances and lack of metrics and enforcement. To address this, we suggest inclusion of additional NNL language wherever applicable, and the addition of policies so that new development requires monitoring, adaptive management, and accountability measures to ensure that NNL is actually achieved through avoidance of critical areas and adequate mitigation.

Failure to Ensure Mitigation Is Adequate or Completed

Language in 5A-5.4 requiring applicants to develop comprehensive mitigation plans should not be removed unless further detail of specific requirements of the mitigation plan are included in (e)II. Applicants must still be required to develop a detailed mitigation plan that ensures the success of mitigation projects through application of the best available science, long term monitoring and maintenance, adaptive management, and evaluation of mitigation project efficacy. Policies must include additional language to ensure mitigation is in-kind and in-place, provides equivalent or improved ecological function and value, and accounts for both cumulative impacts and the long ecological timescale. To ensure protection of critical areas and compliance with no net loss, an applicant must be required to have its mitigation plans reviewed by qualified professionals using best available science prior to permit or project approval. Post-project evaluations should also be conducted using best available science to ensure NNL requirements are met. There must also be specific policies put in place to force compliance with no net loss when mitigation measures are shown to be inadequate.

Inadequate Protections for Riparian Habitat Areas

In addition to corridor connections and tree canopy which have been called out in the comprehensive plan, riparian zones and habitat buffers that adhere to WDFW Priority Habitat and Species vol 1 (2020) guidance should also be specified in environmental goals and policies wherever applicable. Adequate and mature riparian vegetation plays a critical role in maintaining water quality by reducing water temperature in the stream and microclimate, protecting the hyporheic zone, reducing evaporation, filtering and trapping of sediments and pollutants, increased groundwater infiltration, and preventing eutrophication. Riparian zones also contribute other substantial and critical ecosystem services by providing flood resilience through increased bank stabilization and erosion control, climate change resilience through buffering against extreme weather events and temperature fluctuations, agricultural enhancements through reduced nutrient runoff, reduced need for flood prevention infrastructure, decreased soil compaction, increased organic matter and nutrient cycling, and improved pollination services. Riparian zones also provide important fish and wildlife habitat to over 80% of terrestrial species and enhance the overall quality and aesthetics of the landscape. Therefore, it is essential that riparian habitat be afforded better protections commensurate with the innumerable benefits they provide and more specifically protected in the comprehensive plan policies.

Specific Environmental Policies

The Tribe proposes the following specific language changes to the Draft Comp Plan policies:

5A: Preserve and protect wetlands to maintain no net loss of wetland habitat, functions, and values. ~~Encourage the voluntary~~ Require restoration and enhancement of wetlands lost or degraded by development to meet no net loss requirements ~~wetlands~~. …Protect, restore ~~where~~

~~practical~~, and enhance fish and wildlife populations and their associated habitats, including corridor connections, riparian buffers, and tree canopy.

5A-1.2: The classification and designation of critical areas should not be moved to the Critical Areas Ordinance. This level of detail specifying a list of the types of critical areas to be classified for conservation, protection, and risk is helpful in guiding countywide policy without the need to refer to more detailed ordinances. Additionally, the section of policy (c) "(Critical areas shall be designated upon completion of a site assessment done by a qualified professional) during the process of a permit or development application" is not redundant and should be maintained to ensure that proper critical areas assessments are done during the permitting phase, prior to approval.

5A-3.1: Wildlife corridors and connections between areas of native vegetation, and riparian corridors, wetlands, and open space shall~~should~~ be conserved in accordance with state and federal laws and approved recovery plans and additionally protected whenever feasible through incentive programs.

5A-4.4: To promote a consistent and efficient regulatory framework, all existing county land use regulations shall be reviewed and, where appropriate, modified to eliminate redundancies or conflicts with other county, state or federal requirements for critical areas including, but not limited to, the Shoreline Management Act, the Endangered Species Act, the Clean Water Act, policies related to No Net Loss, and the Skagit Instream Flow Rule.

5A-5.1: Critical Areas shall be designated and protected to maintain no net loss of wetland habitat, functions, and values. Priority shall be given to the avoidance of impacts to Critical Areas, followed by the minimization of impacts and full mitigation respectively.
(a) Wetlands
(iii) Mitigation projects shall~~, whenever feasible~~ achieve no net loss of wetland area and provide equivalent or greater functions and values both on site and, to the extent that impacts may be cumulative, off site. The preferred mitigation sequence (avoid, minimize, rectify, reduce, or compensate for the environmental impact) shall follow that listed in WAC 173-26-201(2)(e) and all mitigation shall account for loss of ecological function during the time it takes mitigation to achieve full functionality.
(iv) A wetland buffer zone of adequate width, as determined by best available science, ~~should~~ shall be maintained between a wetland and any adjacent development to protect the functions and integrity of the wetland. Required buffers must be protected and managed using best management practices to sustain ~~the~~ full and improved buffer functions.
(v) Wetland buffer zones ~~should~~ shall be retained in their natural condition to the greatest extent possible. Re-vegetation may be required to restore the functional value of the buffer zone, and

any mitigation must account for the loss of function during the time it takes a restored buffer to achieve full functionality.
(vi) Regulated wetlands and their associated buffer zones shall be protected from adverse wetland impacts to their overall functions. No wetland or buffer zone alteration should be authorized unless it can be shown that the impact is unavoidable and that the adverse impacts are offset by deliberate restoration, creation or enhancement of wetlands and buffer zones.
(vii) Skagit County shall ensure no let loss to designated Shorelines of the State and Shorelines of Statewide Significance through monitoring, enforcement, reporting and through the application of a robust Shoreline Master Program.
(d) Fish and Wildlife Habitat Conservation Areas
(i) Landscape-scale habitat corridors shall be considered in stream/riparian and wetland buffer regulations ~~as feasible~~ to protect habitats associated with riparian dependent species.

5A-5.2: Land uses that are incompatible with critical areas shall be prohibited ~~discouraged~~.

5A-5.4: Language in (iv) (b) and (c) must not remove requirements for mitigation plans including monitoring, maintenance, and contingencies to ensure mitigation success.

5A-5.5: (C) Critical area restoration, creation, and enhancement projects must~~should~~ be completed prior to alteration, where possible. In all other cases, replacement must~~should~~ be completed prior to use or occupancy of the development.

5A-5.6: ~~Continue to I~~ Implement enforcement procedures to ensure compliance with applicable Skagit County ordinances.
(a) Enforcement action shall be taken whenever a person has violated the provisions of any applicable Skagit County ordinance used for critical area protection.
(b) The choice of enforcement action and the severity of any penalty should be commensurate with ~~based on~~ the nature of the violation, the damage or risk to the public, and ~~or~~ the public and natural resources. Damage to critical area values and function shall be assessed by a qualified professional and shall account for short-and long-term direct and indirect impacts, and cumulative impacts.
~~(c) Work with property owners to resolve critical area code violations through voluntary compliance measures as feasible.~~
Climate Change: The following resilience policies are provided to support protection, enhancement, and restoration of the natural environment:
(a) Enhance urban tree canopy to support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strengthen economic prosperity.

(b) Restore and enhance riparian buffers to mitigate effects of rising water temperature, conserve water resources, manage stormwater and pollution, and protect against adverse impacts of extreme weather.
(~~b~~c) Protect and restore natural resources that sequester and store carbon such as forests, farmland, wetlands, estuaries, riparian areas, and urban tree canopy.
(~~c~~d) Identify and address the impacts of climate change on the region's hydrological systems.
(~~d~~e) ~~Consider the~~ Work to mitigate potential impacts of climate change ~~and~~ on fisheries ~~protection~~ and on the region's water supply.

Specific Climate Change Policies

CE 1.1: Farmland Conservation and Habitat Restoration Conflicts
Draft policy CE 1.1 proposes securing funding to protect agricultural lands, which we understand as an effort to balance agricultural and ecological priorities. However, this policy must not conflict with habitat restoration opportunities, particularly in floodplain, riparian, and estuarine areas critical to salmon recovery, given that a substantial amount of natural habitat and ecological value was lost when these habitats were originally converted to agricultural land. We are concerned that the current wording could preclude habitat restoration on agricultural land. Restoration of farmland to wildlife habitat or for conservation purposes, or to forested land should be promoted for climate resiliency, particularly when farmland is no longer productive or sustainable. Restoration of unproductive farmland to wildlife habitat not only enhances climate resilience in general at the landscape level, but will further enhance viability and climate resilience for adjacent agricultural areas. Because much of the county's existing agricultural lands are within the floodplain, actual development pressure should be relatively low. We recommend the following revision:

> Continue to support and secure funding to protect agricultural land from development ~~conversion to other uses~~ through the Conservation Futures taxing mechanism, federal and state grants, and private funding sources.

CE 1.4: Supporting agricultural resilience through providing resilience resources and programs should not only be for the purpose of making informed business decisions, but also for making informed land management decisions. This should include best practices for climate resilient farming, including information about benefits of riparian buffers and water conservation. We suggest the following changes:

> Support the WSU Skagit County extension program and the Skagit County Conservation District in providing agricultural resilience resources and programs to support farmers in making informed land management and business decisions that support climate resilience ~~in a changing climate~~.

CE 1.6: Integrated Strategic Investment Plan

Policy CE 1.6 should be revised. Acquisition of farmland development rights should include the possibility for restoration projects, riparian habitat buffers (including to meet federally approved water quality standards), and conversion of unproductive farmland to habitat, all of which have greater contributions to climate resilience than would be gained from farmland alone.

The Tribe strenuously objects to the section regarding supporting water rights for sustaining Skagit Agriculture, and it must be removed. As the County is well aware, this water right would be a violation of the Skagit Instream Flow Rule (WAC 173-503) and impair the Tribe's federally protected senior water rights. We recommend the following policy revisions:

> Protect the +/-88,000 acres of remaining prime farmland in Skagit County. Success requires continued commitment to restrictive farmland zoning and precluding new development in the floodplain to prevent conversion to development; continued farmland development right acquisition through the Farmland Legacy Program; ~~support for an adequate water right necessary to sustain Skagit Agriculture~~; ~~and an integrated, strategic investment plan in partnership with Skagit tribes and diking/drainage districts~~ and a scientifically-based plan to holistically address sea level rise, habitat ~~enhancement~~ restoration, and farmland preservation on the Skagit/Samish Delta ~~downstream of the Wild & Scenic portion of the Skagit River~~.

CE 9.4: Water Resources

The Swinomish Tribe does not support Agriculture & Food Systems policy CE 9.4. This policy CE 9.4 should be completely removed from the Draft Comp Plan. Instream flows in the Skagit River have been demonstrated to be inadequate during summer months to support robust salmon populations. Salmon are crucial to the Tribes' wellbeing in addition to being part of its Treaty-secured and adjudicated fishing rights. Additional reductions of instream flows will be detrimental to both salmon populations (including ESA-listed Chinook Salmon) and to the Tribe, which depends on this resource for ceremonial, subsistence and commercial purposes. Additionally, element CE 9.4 disregards the Tribe's federally protected senior water rights that stands to be further impaired if additional uninterruptible water rights are granted for agriculture withdrawals. We are disappointed that the County promotes additional out of stream uses of water to support agriculture without a shred of scientific basis while also ignoring Tribal needs for sustainable salmon populations in the face of projected reductions in instream flow as a result of climate change.

Furthermore, we are deeply troubled that the County intends to support and advocate for additional uninterruptible water rights despite having provided no analysis on the impacts to instream resources as a result of this advocacy. These proposed baseless and entirely

unsupported additional water withdrawals do not comport with GMA Planning Goal 10, "Environment" (RCW 36.70A.020(10)). It requires Skagit County to "protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water." In addition, this proposed policy is in conflict with Planning Goal 9, "Open Space and Recreation" (RCW 36.70A.020(9), which directs the county to "conserve fish and wildlife habitat." The County should provide the information it relied upon to propose this element of its Comprehensive Plan.

CE 10.3: Restrict Development in Flood-Prone Areas with Best Available Climate Science
The language in CE 10.3 suggests elevating or setting back structures in flood-prone areas, which is insufficient. Development should be precluded entirely in these areas, as allowing development—even if modified—disrupts floodplain ecosystems critical for salmon. Additionally, this policy must explicitly require the use of best available climate science, incorporating the most recent flood hazard data and climate projections.

We recommend the following revision: "Preclude new development in flood-prone areas, integrate best available climate science into planning efforts, and prioritize flood hazard management strategies that protect habitat and support salmon recovery." This aligns with the standards outlined in our previous SMP comments and addresses the importance of preserving floodplain ecosystems for ecological resilience.

CE 10.4: Shoreline Stabilization with Science-Based Justification
CE 10.4's preference for "soft" shoreline stabilization techniques lacks enforceable requirements for scientific justification. We reiterate our concern that any shoreline stabilization must rely on Best Available Science and require a scientifically justified demonstration of need, performed by a qualified professional. This policy should be consistent with the newly codified USACE Regional General Conditions for Nationwide Permits within Puget Sound (June 2024), specifically those that apply to Nationwide Permit 3. This approach, consistent with our 2022 SMP comments, is necessary to protect natural sediment dynamics, salmon habitat, and riparian health.

We recommend revising CE 10.4 to read: "Shoreline stabilization projects must be based on Best Available Science, including an evidence-based, scientifically justified demonstration of need conducted by a qualified professional." Furthermore, mitigation plans should be required to offset any impacts, with oversight from environmental and tribal experts to safeguard coastal and estuarine ecosystems.

The Tribe also feels there should be an additional climate policy in the Water Resources section supporting the instream flow rule, protecting adequate flow for proper hydrological function and habitat for ESA-listed salmonids and treaty-reserved resources under conditions of climate

change-induced drought and temperature rise. This policy should support the use of full site potential tree height riparian buffers (WDFW PHS Vol 1 2020) to protect critical water resources in the Skagit River basin from increased impacts from climate change.

> Additional Policy CE 9.5 Climate Resilience; Drought; Agriculture: Support climate residence of streams and rivers for salmonid populations by protecting aquatic habitats from low stream flows through preventing further water withdrawals, promoting restoration of full site potential tree height riparian buffers to ameliorate water temperature rise and decrease evaporation, and restoring hydrologic function of waterways.

Climate Integration: Enhancing Specificity and Enforcement

The Swinomish Tribe acknowledges these draft climate policy considerations; however, the language is vague and/or lacks specific implementation measures, both of which could hinder effective action on climate resilience and environmental conservation.

- Policy 4A-5.6 on drainage management for agricultural lands emphasizes mitigating flooding and drainage impacts, including the installation of adaptive drainage infrastructure such as improved culverts, ditches, and water retention systems to prevent flooding and waterlogging of crops, but fails to specify how these actions will be monitored and evaluated for effectiveness. The Tribe objects to this policy being included here, unless and until there is a scientific study demonstrating need supported by best available climate science, which addresses potential harm to ESA-listed species and their habitats, and proposes mitigation necessary to offset environmental impacts of additional drainage infrastructure.
- Policy 5A-5.1 regarding critical areas protection outlines objectives for preventing habitat degradation but lacks enforceable language or specific buffer zone widths for wetland and riparian zone protections. Including standards based on the Washington State Wetland Rating System and additional guidelines from WDFW Priority Habitats and Species vol 2 (2022) could strengthen the policy's ecological protections and clarify compliance requirements.
- Policy 4B-2.11 on wildfire resilience lacks detail on funding, staffing, and coordination efforts for wildfire planning, especially in vulnerable rural and forested communities. Per HB 1181, this draft policy should align with the Land Use Element goals, including: 1) giving special consideration to achieving environmental justice in its goals and policies; 2) mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include reducing residential development pressure in the wildland urban interface area; and 3) separating human development from wildfire prone landscapes.

Conclusion

We acknowledge that the Draft Comprehensive Plan represents an incremental step forward from the County's previous draft climate and environmental policies. However, without specific language to ensure salmon habitat protections, enforce adherence to best available science, and clarify alignment with the Shoreline Master Program, these policies fail to meet requirements and risk reinforcing past prioritizations that favored agriculture and development over ecosystem health. The Swinomish Tribe remains committed to collaborating with the County to refine these policies to reflect a balanced, sustainable, and habitat-sensitive approach to climate resilience.

Thank you for the opportunity to comment on these critical issues. Please refer to our June 2021 and March 2022 SMP comments for further details, scientific references, and literature to support this planning process. We look forward to a revised draft that more fully respects and protects the natural and cultural resources within Skagit County.

Sincerely,



Heather Spore
Environmental Policy Manager
Swinomish Indian Tribal Community

Tara Satushek

Comment # 55

From: Jamie Hillery <jhillery@merrillring.com>
Sent: Thursday, November 21, 2024 9:00 AM
To: PDS comments
Cc: Commissioners; Kendra Smith
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Skagit County Planning Department
Skagit County's 2025 Comprehensive Plan Draft Policies
November 20, 2024

Dear Ms. Satushek and Mr. Eckroth,

I'm writing as Chair of the Skagit County Forest Advisory Board (FAB) regarding the future comments this advisory board would like to make concerning the Draft of the Climate and Environment Elements of the Comprehensive Plan. It is unfortunate, but the reality is that this Board only meets once a month. Your email announcing a comment period from October 22, 2024, to November 22, 2024, was received October 21, 2024, without previous knowledge that this would be coming out at this time. With the release of the County's Climate Element after our October meeting, leaving us with only the November 14th meeting, we are unable to provide input by November 22nd. Due to numerous rule making actions requiring the FAB's timely comments and recommendations to the Board of County Commissioners on both State and Federal actions occurring at this time (State rule-making on water-typing, Federal National Old Growth Amendment and USFS Northwest Forest Plan Amendment) we have been inundated and unable to purposefully meet to pull together our expertise and then comment on this important topic, especially in lieu of the significant role forestry plays in climate and carbon.
The FAB's first meeting since the release of the draft work on the Climate Element was last week and though we could not take that on that day, we are proposing to have a subcommittee meeting December 4th with the intent of providing comments to you by December 20th. It would have been our hope to have had an in-person meeting with staff working on this during this time frame for better dialog and input. Perhaps that can happen for our January meeting.
Again, this is an important topic to us, and we believe forestry plays a significant role in achieving climate resilience, carbon sequestration and storage.

Sincerely,

Jamie Hillery
Chairman, Forest Advisory Board
Forest Operations Manager, Merrill & Ring, Inc/Grandy Lake Forest Associates LLC

SKAGIT COUNTY FOREST

ADVISORY BOARD

Jamie Hillery, Chairman

Peter Janicki David Nielsen

Al Craney Chuck Parker

Gordon Iverson Tim Raschko

Kris McCall Aubrey Stargell

John Gold Steve Tift

Dave Chamberlain

Kendra Smith, Staff

Tara Satushek Climate Comment # 56

From: Alison Pietrone <apietrone@hotmail.com>
Sent: Thursday, November 21, 2024 12:11 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive plan draft policies

EXPAND THE USE OF MULTI-MODAL TRANSPORTATION IN REDUCING GREENHOUSE GAS EMISSIONS (GHG) AND VEHICLE MILES TRAVELED (VMT).
• Support: Proposed policy revision 8A-1.8 Multi-modal transportation. “Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions.”
• Support: Proposed policy revision CE 7.1 “Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions.”
• Recommend: Development of multi use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities. And to create more greenspace when developing new housing projects.
• Recommend: Identify and map roads and bridges that are dangerous for cyclists and develop plans to make them safer by adding shoulders or bike lanes.
• Recommend: Allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.
• Recommend: Prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. Develop additional trails to attract recreationists and eco-tourists like birders which would increase the tourism economy.

Please consider these improvements for the health and safety of our citizens.

Thank you for your time,
Alison Pietrone
24307 Lee Rd.
Mount Vernon, WA 98274

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Tara Satushek Comment # 57

From: Todd & Elizabeth Jann <jannclan@fidalgo.net>
Sent: Thursday, November 21, 2024 9:49 AM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

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Esteemed Members of Skagit County Planning Department,

I have been a resident of Skagit County since 1981. My children attended Skagit County schools. I am currently retired after working as an RN in the valley since 1990. I feel myself and family have a vested interest in the future plans for our community.

I would like to advocate for what I feel is the necessity of an environmental advisory board to provide expert information for educated choices and decisions for our county. I realize emotions and opinions are important but we also need to have specialized, expert input to guide and provide reason to our decision making.

As a property owner in the valley, I am deeply concerned about the results of climate change I can see with my own eyes. Our relatively young cedar trees, alders, Indian plum, all native plants are dying off after slowly increasingly years of extreme dryness in our area. My husband and I refer to them as the haunted forests, due to their stark, bare, dead appearance. We are very disconcerted by the die off. As defense, we have resorted to planting species indigenous to Northern California, for example, sequoias, which so far are thriving as they are more drought tolerant.

We both hope that with comprehensive input from specialists, we can go forward with a plan to ensure we maintain the beauty, wildness, agricultural lands and clean air, water and soil our valley deserves for our people, plants and wildlife.

Please consider the addition of an environmental advisory board to the decision making process for the good of us all. Thank you for your time and effort in this endeavor. I appreciate you giving me the opportunity to voice my thoughts on this topic. We need to work together to ensure our county remains the magical place it is for our future generations.

Thank you,
EA Jann
pob 2112
Mount Vernon, WA. 98273

Comment # 58

RECEIVED
NOV 22 2024
SKAGIT COUNTY
PDS

November 22, 2024

Planning and Development Services
1800 Continental Place
Mount Vernon WA 98273

Subject: Comments on "Skagit County's 2025 Comprehensive Plan Draft Policies"

Dear Planning and Development Services staff,

Thank you for the opportunity to comment on the draft policy updates. The following comments are submitted by Indivisible Skagit regarding changes to the Environment element and the new Climate element. Indivisible Skagit is a local organization committed to engaging the community in positive changes that lead to a more equitable and sustainable future for Skagit County and the country. We are more than 1400 members strong.

Environment Element:

We support the insertion of specifics regarding no net loss of wetlands and the importance of preserving tree canopy and connections. Also, the insertion of references to climate change regarding flood protections and the cooperation with state and federal agencies. Consistency across jurisdictions will foster greater stability for citizens as well as businesses navigating the changing environment. Many of the policy additions addressing climate change will result in the protection of more forest and farm resources in Skagit County. We support the recommendation of siting infrastructure away from the 500-year floodplain. We are seeing 100-year flood events every 5 or 6 years on the Skagit River and dealing with many developments that were permitted in hazardous areas. We recommend stronger protection to keep people out of harm's way and to site essential services to be available during times of crisis.

Climate Element:

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

2. Require the use of sea level rise models and updated flood hazard mapping when making decisions regarding zoning and allowed uses. These maps should be made public so that landowners and the greater community can be informed.

3. Shoreline stabilizations – we support the policy that requires landowners to demonstrate a need before permitting stabilization. Stronger language should be added that requires landowners to demonstrate how their stabilization will not negatively impact neighboring properties by reducing accumulation of sediments further down drift cells.

4. Buildings and energy – there are many policies in this section that we support. They should go further in incentivizing construction to incorporate green energy features, including making community solar more accessible to everyone.

5. Land use - Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.

6. Land use - Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.

7. Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

We support many of the recommended policies in the Climate Element. We support the acknowledgement of the importance of waste management, water resources, multi-modal transportation and the protection of forests to the resilience of Skagit County. It is in the best interests of the community that our county plan for the future, utilizing all available resources to protect the existing natural and agricultural values of this amazing place.

Sincerely,

Indivisible Skagit Support Team, all residents of Skagit County

Christie Stewart Stein

Christine Kohnert

Brenda Cunningham

Lisa Ellis

Roger Phillip

Brenda Cunningham
on behalf of the
Support Team.

Skagit Audubon Society
P.O. Box 1101
Mount Vernon, WA 98273

Comment # 59

RECEIVED
NOV 22 2024
SKAGIT COUNTY
PDS

November 22, 2024

Skagit County Planning and Development Services
Comments on "Skagit County's 2025 Comprehensive Plan Draft Policies"
1800 Continental Place
Mount Vernon WA 98273

Re: Comments on the Periodic Skagit County Comprehensive Plan Update – Climate and Environment Elements

Dear Skagit County Commissioners, Planning Commission, and Planning & Development Services Staff:

I am writing on behalf of Skagit Audubon Society to offer comments on the draft update of the Skagit County Comprehensive Plan's Environment Element and the new Climate Element. We appreciate the opportunity to participate in the update process and have attended several of the open houses to contribute comments there.

Skagit Audubon is the local chapter of the National Audubon Society. Our 497 members share an interest in birds and other wildlife and in protecting and restoring the habitats on which they depend. In addition to rivers, streams, the marine environment, and undeveloped land, these habitats include agricultural lands and working forests which are also important for wildlife. Skagit Audubon's members value the birds, varied habitats, and protected rural character of our county, and we want the Comprehensive Plan policies to protect these while also proactively moving our community towards a green energy future.

The *Skagit County Climate Action Plan*, dated March 16, 2010, opens with this statement from the County Commissioners:

> "When Skagit County embarked on its Climate Action and Sustainability Initiative in June 2008, we did so with the intention of committing ourselves fully to reduction of our greenhouse gas emissions and sustainable use of our resources. Today, in an economy still deep in recession, we find that commitment a bit harder to keep, but no less important. The savings we reap from implementing the policies in this plan will benefit the residents and taxpayers of Skagit County for years to come. While the energy savings will allow us to reduce our carbon footprint and do our part to combat climate change, the financial savings will empower us to continue providing the high levels of service our constituents demand and deserve."[1]

Skagit Audubon members would like to see the same determination and commitment of fourteen years ago in the Climate Element and related parts of the Comprehensive Plan, recognizing our county as having an important role to play in addressing climate change. We hope to see a strong

[1] P. 6, CAP 2010 Adopted.pdf

commitment to implementing the policies of the Comprehensive Plan. There was no time to lose in 2010, and there is much less time to lose now.

I would note that in our comments the emphasis on addressing climate change and its effects supports our mission in that National Audubon research has identified climate change as the single greatest threat to birds.[2] Audubon Washington's 25 chapters, including Skagit Audubon, and its thousands of members advocated vigorously for passage of HB 1181, which calls for addressing climate change in Comprehensive Plans. Dealing with climate change is a challenge requiring action at every level: by individuals, towns, counties, states, and the nation. As residents of Skagit County, we want our county, just as our state, to be a leader in addressing this challenge. The draft Climate Element policies are a good start, and we call on you to include them in the final updated Comprehensive Plan largely as written, with some recommended strengthening,.

The draft policies under the Climate Element and the suggested updates to the Environment Element contain many good ideas. There are none that we would ask you to delete. We offer the following comments and suggestions.

Climate Element

1. **Goal CE 10.0 Climate resilience; Drought; Land use; Sea level rise; Flooding[3]**
   We strongly support this goal for zoning and development as written:

   > *"Enhance community resilience by integrating climate change projections into land use, infrastructure planning, and development regulations, ensuring long-term safety from sea-level rise, flooding, wildfires, and other climate-exacerbated hazards while protecting natural ecosystems."*

   It is appropriate, and in fact essential, that the Comprehensive Plan address sea level rise as an important climate change effect, which it does at a number of points. We are very concerned, however, that the draft update of Skagit County's Shoreline Master Program (SMP) does not address sea level rise. We strongly urge the County not to wait to update the SMP until it is again required by law, but to begin as soon as possible to address sea level rise in that plan too.

2. **Policy CE 10.2[4]**

   > *"Consistent with State and Federal standards, plan and build facilities, utilities, and infrastructure projects to mitigate or withstand flooding from rising sea levels and changing precipitation patterns."*

   Please either expand this policy or write a separate one to address existing facilities and infrastructure in harm's way from sea level rise, increased flooding, or coastal erosion. The policy as written addresses only future construction. Assets at risk need to be mapped and then prioritized for adaptive measures or relocation.

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[2] https://www.audubon.org/climate/survivalbydegrees
[3] P. 2, *2025 Skagit County Comprehensive Plan First Draft, Climate Element,* SkagitCounty_ClimatePoliciesV1.2_1015_PlanningCommission_clean.pdf
[4] Ibid, p.2

3. **Policy CE 10.4**[5]

"Require that proposals for shoreline stabilization demonstrate a need and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise."

Rising sea level and storms of increased severity could motivate shoreline residents to install new or more robust hard armoring. Ultimately, this approach will be futile and will further degrade shoreline processes. We at Audubon are concerned that armoring shorelines destroys the spawning habitat needed by forage fish such as smelt and sand lance. These small species are the base of the marine food chain for salmon, seabirds, marine mammals, and ultimately orcas. We believe that Skagit County should collaborate with the appropriate state and federal agencies to proactively identify and map areas where shoreline residents are at risk from sea level rise. Furthermore, we urge Skagit County to have a policy of incentives, for example through a Transfer of Development Rights program, for shoreline residents living in harm's way to relocate. Policy CE 10.4 should more strongly discourage building where any type of shore stabilization would be needed and should include programs to dissuade such development.

4. **Policy CE 10.7**[6]

"Protect and restore coastal ecosystems to increase the resilience of species, habitats, and communities to climate change."

We strongly support this policy. Please make it more specific to Skagit County, mentioning that as sea level rises what few remaining acres of salt marsh remain will be lost against coastal dikes. To retain and expand the ecosystem services which salt marshes provide by absorbing storm wave impact and reducing coastal erosion, the dikes must be repositioned inland. This also needs to be done to avoid losing key habitat for many avian and marine species.

5. **Policy CE 2.4**[7]

"Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."

We strongly support this policy consistent with our September 23, 2024, letter to the Energy Facility Siting Evaluation Council opposing the Goldeneye Battery Energy Storage System proposal and our October 24, 2024, comments on the draft revised Comprehensive Plan Utilities Element. There are places in Skagit County appropriate for facilities associated with energy production, storage, and transmission with minimal impact to the environment. It is important for Skagit County to identify these locations in advance of proposals being submitted for permitting.

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[5] Ibid, p.3
[6] Ibid, p.4
[7] Ibid, p.5

6. **Policy CE 3.1**[8]

"Expand and bolster efforts to reduce the negative impacts of natural hazards, such as appropriate hazard identification, warning, dissemination of relevant information and data, and public outreach."

The best available science predicts higher rainfall, more frequent storm events, and changing flooding patterns for Skagit County. In light of these predictions, there should be a policy to soon, and then more frequently, update the map of natural hazard areas and to develop less flexible regulations concerning development in those areas. It has been too easy for property owners to obtain permission to build in areas prone to landslides, shoreline erosion, debris flows, and flooding. Building in such hazardous places will become less and less tenable, putting the county in the position of increasingly responding to dangerous and expensive emergencies.

7. **Goal CE 6.0**[9]

"Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."

We are strongly in favor of all the policies proposed under this goal. Consistent with the Audubon mission, we suggest adding "and retention of wildlife" to the above statement so that it reads, "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, GHG emissions reduction, and retention of wildlife." The presence of diverse wildlife, especially birds, is one of the characteristics of Skagit County most important to our membership.

8. **Policy CE 6.6**[10]

We strongly support natural climate solutions as part of the mix in addressing the effects of climate change, and propose the following revised language:

"Protect and manage natural lands (forests, grasslands, wetlands, eel grass meadows, and salt marsh) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems." (new language underlined)

County policies should strive to protect this function by actions to retain and expand these types of near shore environments.

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[8] Ibid, p.5
[9] Ibid, p.9
[10] Ibid, p.10

Integration of Climate into other Comprehensive Plan Elements

9. **Policy 9A-5.1**[11]
We would like to see stronger wording about phasing out fossil fuels in heating buildings as this is a major source of greenhouse gas emissions in Skagit County.[12] We propose the following revised wording:

> *"Non-renewable Resources – Energy generation from non-renewable resources, such as natural gas, shall be phased out where possible, and the county will explore the use of renewable energy sources in both new and existing buildings."* (substituted word underlined)

There should be an emphasis, too, on equipping Skagit County buildings with solar panels to supply as much of the energy need of the given facility as possible.

10. **Policy 9A-5.5**[13]
We strongly support the policy as stated:

> *"In parallel, support the transition of high carbon emitting sectors, including oil refining and industrial gas manufacturing, to low carbon processes or industries."*

11. **Policy 9A-5.6**[14]
We propose the following revised language:

> "*The use of solar energy for water and space heating shall be encouraged and incentivized, including on existing and new commercial and industrial buildings. Where needed, ordinances shall be developed to protect solar access, particularly in high-density and overburdened communities, to enhance energy resiliency and equity. Skagit County will strongly encourage development of community solar projects on county-owned buildings and above county-owned parking areas.*" (changed or new language underlined)

Community solar installations could provide residents with the opportunity to invest in solar power when their own properties do not have the appropriate location for solar panels or when they cannot afford the cost of a complete installation. Anacortes has several examples on public buildings already.

[11] P. 7, Comprehensive Plan Element: All Elements (Climate Integration), SkagitCounty_ClimateIntegration_PlanningCommission_0115.pdf
[12] P. 6, CountyGHGAnalysisReport_Skagit.pdf
[13] P. 8, Comprehensive Plan Element: All Elements (Climate Integration),
[14] Ibid, p.9

Environment Element

12. **Policy 5A-3.1**[15]

"Wildlife corridors and connections between areas of native vegetation, riparian corridors, that connect wetland systems, and open space should be conserved and protected whenever feasible through incentive programs."

We strongly support this and other policies to identify, enhance, and protect wildlife corridors.

13. **Policy 5A-5.1(d)(i)**[16]

We support this policy, but propose strengthening it by deleting "as feasible" to read as follows:

"(i) Landscape-scale habitat corridors shall be considered in stream/riparian and wetland buffer regulations to protect habitats associated with riparian dependent species."

14. **Policy 5A-5.3(d) Geologically Hazardous Areas**[17]

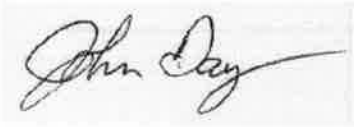
Please refer to our number 6 above. The wording of 5A-5.3(d) allows too much leeway for building in geohazard zones. Here and in Snohomish County we have seen the destructive and potentially catastrophic potential of too lax policies around development in hazard zones. This potential will only increase with greater storm severity and other effects of climate change.

15. **Environmental Advisory Board**

We understand that other organizations and individuals are urging the Board of County Commissioners to establish an Environmental Advisory Board to support their decision-making on such things as climate change-related actions. This is an excellent idea, and we support it. The technical aspects of some of the challenges facing Skagit County call for specialized expertise to aid our County Commissioners in making sound decisions based on the best available science.

Thank you for your attention to our comments. We look forward to seeing future iterations of the Comprehensive Plan updated policies.

Sincerely,



John Day
For the Skagit Audubon Board

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[15] P.5, 2025 Skagit County Comprehensive Plan First Draft – Environment Element, SkagitCounty_EnvironmentalPolicies_PlanningCommission_1015.pdf
[16] Ibid, p.11
[17] Ibid, p.14

Tara Satushek Comment # 60

From: Terry Nelson <terry@svcea.org>
Sent: Thursday, November 21, 2024 2:22 PM
To: PDS comments
Subject: Fwd: Skagit County's 2025 Comprehensive Plant Draft Policies

---------- Forwarded message ---------
From: **Terry Nelson** <terry@svcea.org>
Date: Thu, Nov 21, 2024 at 2:12 PM
Subject: Skagit County's 2025 Comprehensive Plant Draft Policies
To: <pdscomments@co.skagit.wa.us>

Hello-

I realized after I just sent you the following draft that I forgot to properly identify myself so I am trying to do that now. My name is Terry Nelson, 701 Whatcom St., PO Box 100, La Conner, Wa. and I am the President of the Skagit Valley Clean Energy Alliance and-

I am a lifetime resident of La Conner and have seen many changes locally in my 80 years of residence here. I've been here for at least two times when the channel flowed into the lower areas of town which has made me realize that we are at a very low elevation relative to much of Skagit County and will be among the most affected by sea level rise in the future. These events have made me appreciate the benefits of resilience for our community by utilizing proven technologies like solar and other options being used in other parts of the world. There are many great suggestions in what I have read so far and therefore I would like to strongly endorse the following suggestions for the Comp Plan:

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

2. Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.

3. Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from

wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.

4. Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

5. EXPAND SEA LEVEL RISE POLICY REVISION

• Support: Proposed policy revision CE 10.3 “Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling.”

• Recommend: Skagit County should actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years.

• Recommend: A sea level rise vulnerability assessment and make it public. • Support: Proposed policy revision CE 10.4 “Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise.” • Recommend: Do not classify boulders as soft armoring.

• Recommend: Require that new development be situated to avoid needing shoreline stabilization.

• Recommend: Add language that avoids construction in tidal and storm surge areas.

6. MAKE CHANGES TO POLICY REVISION FOR RURAL LANDS CONSERVATION AND REDUCTION OF CARBON EMISSIONS

• Support: Proposed policy revision 3A(a), “Protect the rural landscape, character, and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience.” (Thank you for adding “resilience” to the Comprehensive Plan draft.)

• Support: Proposed policy revision 6.0 “Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction.”

• Support: Proposed policy revision 6.6 “Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems.”

• Recommend: Recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their important role in carbon sequestration. In addition, forest lands without development are easier to manage during wildfires, and grasslands, wetlands, and marginal agricultural land can hold flood waters thus protecting homes and businesses.

• Recommend: Delete existing policy 3A(b) “Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities.” Goal 3A(b) allows an increase in rural housing densities which would change Skagit County’s rural landscape, character, and lifestyle. It would increase GHG emissions by increasing vehicular miles driven.

• Recommend: The County needs to prohibit more development outside of cities, towns, and urban growth areas. Rural development will result in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services.

7. ADD TO ENERGY CONSERVATION, GENERATION, AND STORAGE POLICY REVISIONS

• Support: The draft revision emphasizes increased use of clean energy sources and a reduction of burning fossil fuels for energy.

• Support: Proposed policy revision CE 2.4 “Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands.”

• Support: Proposed policy revision CE 10.5 “Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle.”

• Recommend: The County should consider installing community solar arrays, similar to what has been done in Anacortes. Individuals can invest in solar arrays on public buildings and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.

• Recommend: The County should plan now for clean energy installations, mapping and developing policy and code concerning the siting of electrical energy generation and storage facilities. The County should indicate where such facilities can be sited with the least conflict, and where they do not belong.

8. EXPAND FOREST RESOURCE LANDS WILDFIRE STRATEGY

• Support: Proposed policy revision CE10.6 “Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards.”

• Support: Proposed policy revision 4B-2.11 “Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires.”

• Recommend - The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities are no longer allowing development in fire prone forests and wildlands.

9. EXPAND THE USE OF MULTI-MODAL TRANSPORTATION IN REDUCING GREENHOUSE GAS EMISSIONS (GHG) AND VEHICLE MILES TRAVELED (VMT).

• Support: Proposed policy revision 8A-1.8 Multi-modal transportation. “Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions.”

• Support: Proposed policy revision CE 7.1 “Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions.”

• Recommend: Development of multi use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities.

• Recommend: Identify and map roads and bridges that are dangerous for cyclists and develop plans to make them safer by adding shoulders or bike lanes.

• Recommend: Allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.

• Recommend: Prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. Develop additional trails to attract recreationists and eco-tourists like birders which would increase the tourism economy without increasing the carbon footprint.

Tara Satushek Comment # 61

From: Judith Chilcote <judithchilcote@gmail.com>
Sent: Thursday, November 21, 2024 2:51 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Re: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Members of the Planning Commission,

Thank you for your work on the Climate section of the Skagit County's Comprehensive Plan Draft and for taking comments. After watching the recording of the meeting of the Planning Commission from October 9th I am compelled to make a public comment.

I have lived in the Skagit Valley since 1975, raised a family, and worked in the medical community until retiring in 2020. People come here, myself included, for the natural beauty of the mountains, Salish Sea, forests, and farmlands. We, as a community, need to have a vision about how to shape and preserve our natural resources and environment. Climate change is accelerating, affecting sea level rise, causing hotter drier summers and more frequent wildfires in the NW and British Columbia. This threatens our environment with smoke nearly every summer. I do not recall in the decades past pollution from fires being so frequent.

One way to help make decisions about how to meet state mandates and face the ever changing climate impacts that are upon us is to establish an Environmental Advisory Board. Other counties (Whatcom, Snohomish and King) have EABs which are made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas (GHG) emissions reduction, climate impacts mitigation, urban and rural planning, but not limited to these experts. This could help the Planning Department and County Commissioners look at environmental issues holistically and make decisions based on the best available science. The county population is and will continue to grow. We need to be proactive.

In regard to using other methods of transportation I support more bus routes, perhaps with smaller electric buses or vans that have more routes and more frequent stops. I live on the route from Big Lake to Mount Vernon. As far as I know, no buses travel on Little Mountain Road. I would love to bike to Mount Vernon, but the road has no safe shoulder and traffic frequently speeds along this road. We can build trails that bikes can utilize for people to get to work, recreate on, complete their errands and build creative alternatives to GHG worsened by automobiles. The trail that connects Burlington to Sedro Woolley and the Cascade Trail from Sedro Woolley to Concrete is a great example of how to start the transition for other types of transportation.

Please consider establishing an EAB to help advise our commissioners to help meet the state mandates. The benefits of strong climate policies and actions at the County level include green jobs, cleaner air, and protection of natural ecosystems.

Thank you for your time and consideration.

Judith Chilcote
22303 Little Mountain Road
Mount Vernon, WA 98274

Tara Satushek Comment # 62

From: Sophia Steele <ssteele@wspa.org>
Sent: Thursday, November 21, 2024 3:10 PM
To: PDS comments
Cc: Jessica Spiegel; Donny Neel
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Good Afternoon Commissioners,

The Western States Petroleum Association (WSPA) appreciates this opportunity to provide feedback on the Skagit County 2025 Comprehensive Plan Draft Policies. WSPA is a non-profit trade association that represents companies that produce and refine the fuels and create the energy we all need now and for the future, including renewables, biofuels, and sustainable energy projects.

In our initial review, it appears that Skagit County (County) is generally implementing necessary changes to the Skagit County 2025 Comprehensive Plan policies to comply with state laws. One area we would like to draw your attention to is Greenhouse Gas (GHG) Reduction. WSPA member companies are required to comply with the **Climate Commitment Act (CCA)**, a state law that reduces GHG emissions for Washington that not only covers refineries but also serves as a primary compliance mechanism for transportation fuel. WSPA suggests that the County reference in the 2025 Comprehensive Plan this compliance as an approach for GHG reduction related to refineries and transportation fuels. In addition, improved permitting opportunities may be aided by the additional low carbon processes at facilities.

WSPA also requests that the County recognize in its 2025 Comprehensive Plan that the CCA includes as a goal avoiding leakage during the transition period to lower carbon energy. Leakage occurs when local facilities are closed and the associated jobs lost, only to then ship the same exact product from ex-jurisdiction areas, like East Asia or Canada. The 2025 Comprehensive Plan should recognize that the transition to low carbon processes or industries may take time, and that the County supports local industries in the meantime. Specifically, WSPA recommends the following policy language modification be included in the 2025 Comprehensive Plan:

> *"Encourage commercial and industrial facilities to support the transition to low-carbon systems, including incorporation of co-generation system whenever possible. In parallel, support the local industries and avoid leakage to other jurisdictions while also supporting the transition of high-carbon emitting sectors, including oil refining and industrial gas manufacturing, to low-carbon processes or industries needed at the facilities."*

If you have any questions regarding the feedback presented in this email, please do not hesitate to contact me via e-mail at ssteele@wspa.org or by phone at (360) 352-4516.

Sincerely,

Sophia Steele
Sr. Manager, Northwest Region
WSPA

C: 425.890.9723
O 360.352.4516

Tara Satushek

Comment # 63

From: VJ Rose <gardeningvaleriejean@gmail.com>
Sent: Thursday, November 21, 2024 10:28 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

November 21, 2024

Planning and Development Services
1800 Continental Place, Mount Vernon WA 98273

Subject: Comments on "Skagit County's 2025 Comprehensive Plan Draft Policies"

To the staff of Planning and Development Services: I support the language focusing on the importance of preserving trees and tree canopy. So many trees have been cut in the county, without being replaced! No net loss of wetlands is crucial for flood prevention, and habitat preservation. Climate change/climate chaos will make this all the more important!

Create an Environmental Advisory Board, made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners and the Planning Department to look at interconnected environmental issues, and make decisions based on the best available science.

Zoning to keep new construction away from 500-year flood plains is realistic and essential.

When making zoning decisions, require the use of sea level rise models and updated flood hazard mapping, with information available to everyone. This way, landowners and all county residents can be informed.

The policy requiring landowners to demonstrate a need before permitting shoreline stabilization is spot-on. To prevent negative impact on neighboring properties, strengthen the language requiring landowners to demonstrate how their stabilization will not negatively impact neighboring properties.

Protect the rural character of Skagit County by reducing residential development outside the cities. Conserve rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration.

With increasingly dangerous wildfires, the county should halt permitting building in forested areas. The County could proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires.

Prohibit development in areas vulnerable to landslides and other hazards. Increasing rainfall, along the removal of forest cover, creates high risk areas where building should not be permitted.

When my grandparents moved to Mt. Vernon in 1930, there were fewer people and more trees. With population growth, and increasingly severe weather events, it is essential to concentrate building in urban areas, and wisely protect our precious agricultural and forest lands. Thank you for your efforts to plan for a healthy, stable future.

Sincerely,

Valerie Rose

1434 S. 12th St.

Mt. Vernon WA 98274

"The most precious gift we can offer others is our presence. When mindfulness embraces those we love, they will bloom like flowers." Thich Nhat Hanh

Tara Satushek Comment # 64

From: Eddy Ury <eddyu@re-sources.org>
Sent: Friday, November 22, 2024 5:47 AM
To: PDS comments
Cc: Ander Russell; Kaia Hayes; Seth Mangold; Kirsten McDade
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies - Climate & Environment Elements

Honorable Planning Commissioners,

At the October 22nd meeting, Commissioners raised important concerns about the social ramifications of decarbonization pathways, and expressed fears of detrimental outcomes resulting from the electrification of vehicles and HVAC. We heard a sentiment conveyed that targets demanded an unreasonable pace that could diminish the reliability and availability of electric power and combustible fuel, while increasing costs. It was speculated that state lawmakers may have not adequately accounted for these implications, and would subject Washingtonians to risks and austerity in the service of unrealistic goals. These are responsible questions that any policymaker ought to consider. Some answers may be found in the Washington State Energy Strategy, the Transportation Electrification Strategy, and in resource plans reported by Puget Sound Energy. Whatcom County's Climate Action Plan may also be of interest as a reference point.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy and action. On behalf of our members in Skagit County, we are grateful for the opportunity to weigh in on these important issues.

We believe the policies proposed this October - related to the Environment and Climate Change, Resiliency and Greenhouse Gas Emission Reduction portions of the Skagit County Comprehensive Plan 2025 Update - are altogether justifiably advisable to adopt, while their implementation should be beneficial to all local residents, regardless of any impact on future climate conditions. We would support adoption of the proposed policies as drafted.

Further elaborating with additional sub-policies could clarify expectations for implementation. Building on the good work of staff and consultants to implement the public participation plan - through focused interviews as well as open houses - we encourage the Commissioners themselves to engage in direct dialogue with stakeholders, and to further incorporate enhancements and additions suggested by our fellow conservationists with deep roots in Skagit communities.

Thank you for your attention to public input, with thoughtful deliberations of important issues, and commend you for your diligent public service. We look forward to reviewing and discussing more public comments from our peers, and seeing next steps at upcoming meetings. In the meantime, we do wish you all a restful and enjoyable Thanksgiving holiday.

Sincerely,
--
Eddy Ury
Climate & Energy Policy Manager
RE Sources

(360) 733 8307 x 215
RE-Sources.org | Facebook | Blog | E-News

Comment # 65

Tara Satushek

From: Anne Winkes <annewinkes@gmail.com>
Sent: Friday, November 22, 2024 6:33 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I am writing to share with you my thoughts about some of your initial draft policy revisions for the Climate Change Element of Skagit County's 2025 Comprehensive Plan, including the GHG emissions reduction and resiliency sub-elements.

Thank you for engaging the public in the comprehensive plan update process. Thank you for listening to the ideas and suggestions you received from the public at your Open Houses and during your climate change focused stakeholder interviews. And thank you, especially, for including some of the thoughts expressed in those public comments in your climate change draft policy revisions.

As you know, the natural world of Skagit County is unique with tremendous biodiversity in its myriad ecosystems. During our 40 plus years of living here, my husband, our sons, our grandchildren and I have backpacked in the North Cascades, hiked in the foothills, canoed, fished and swum in the county's lakes, rivers and marine waters, listened with awe to coyotes howling, beaver tails slapping, and geese honking, watched slugs and woolly caterpillars cross the dikes as we walk along them, and bicycled country roads across Fir Island, and the Skagit and Samish flats.

We have witnessed the effects of climate change: the increased browning of cedar needles so evident when we hike on Little Mountain, the flooding of LaConner, the inundation of Samish Island Rd, the paucity of snow on the slopes of Mt Baker, the inescapability from wildfire smoke when winds blow it our way, and the high temperatures of the 2021 heat dome.

Environmental Advisory Board

As is evident in the number of policy changes and additions in your initial draft of the Climate Change element and sub elements, responding to the multiple, varied impacts of climate change in Skagit County, those that have already occurred and those yet to come, is a Herculean task. Skagit County needs expert advice as it lays the foundation for mitigating the exceedingly complex impacts of climate change.

Though they go by a variety of names, other counties and cities already have in place environmental and climate impact advisory committees or boards to help them understand environmental issues and plan ahead for climate change. I read in November 15, 2024's Skagit Valley Herald that the Mount Vernon City Council established a Citizen's Advisory Committee and a Climate Planning Technical Advisory Committee made up of community stakeholders, interest groups and academic professionals to help with Mount Vernon's 2025 comprehensive plan update.

It's time the Skagit County Commissioners establish an Environmental Advisory Board to help them, the planning department and the planning commission understand the unique biodiversity and multilayered ecosystems that make up Skagit County's natural world so that they can make informed judgements, based on the best available science, about the our natural lands, waterways and wildlife habitat, and make well thought out plans for dealing with the intensification of climate change's impacts upon our county far into the future.

The county commissioners should select for service on their Environmental Advisory Board people with expertise and interest in environmental conservation and who have demonstrated a willingess to collaborate with others to seek realistic local solutions to environmental concerns and the climate crisis. Skagit County's natural world is so large and diverse, an environmental advisory board must be made up of a group of people with a broad variety of experience and

knowledge, including, but not limited to, conservation of lands and waterways, restoration of wildlife habitat (including salmon habitat), hydrology, environmental education, climate science, biology, botany, geology, and carbon sequestration.

I recognize that the county commissioners can establish an environmental advisory board at any time, but a policy recommending the commissioners do so should be included in the 2025 Comprehensive Plan update.

Public Transit and Non-motorized Transportation

Over the past forty some years I have lived in Skagit County, I have bicycled many of the county's roads. I have also bicycled widely in other Wa state counties, other states, and other countries. My cycling experiences, both good and bad, have given me an appreciation and understanding of how public transportation and non-motorized transportation networks can work together to encourage people, regardless of where they live, their economic level, their physical abilities, and their health, to get out of their cars and walk, ride or roll, thus reducing their personal contributions to GHG emissions and reducing air pollution while improving their own health and the health of their communities.

Because of those experiences, I fully support the following PDS's proposed policy revisions:

- *8A-1.3 Multi-Modal Transportation, "Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."*

- *8A-3.1, "Transit Support- Support Skagit Transit to create incentives to encourage citizens and businesses to participate in transit use over single-occupant vehicles to reduce greenhouse gas emissions and vehicle miles traveled. Enhance the quality of transit systems viability by increasing speed, frequency, coverage, and reliability."*

- *8A-6, Non-Motorized Transportation Network, "Provide an equitable, resilient, safe, and efficient network of trails and bikeways, including both on- and off- road facilities that link populated and historically underserved areas of the County with important travel destinations such as jobs, schools, and essential services……"*

However, the County must look carefully at safety and connectivity as it considers how to best iimplement its proposed policy revisions concerning public transportation and the non-motorized transportation network.

People often say they don't use non-motorized transportation (walking, cycling or rolling) for every day trips or recreation because they don't feel safe doing so. Skagit County's paucity of non-motorized routes (whether bike lanes on roads, sidewalks, trails or paths) contributes to their feelings that it's neither safe nor convenient to use either non-motorized transportation or public transit, or a combination of both.

Connectivity: The County must create safe and efficient walking and rolling networks so people can readily reach their destinations and other forms of transportation, whether they are traveling to jobs, to take their children to school, to buy food, to obtain health care or to meet friends. Non-motorized routes must connect our county's towns, cities, and the green spaces around them, and connect the county's rural areas to towns. Importantly, safe non-motorized routes must connect to public transit hubs—buses, trains, ferries—so locals and tourists can journey farther without needing a car to do so. Clearly defined networks will allow people who don't own cars to safely walk or ride to wherever they need to go (how often my heart has gone out to people out of necessity walking or riding along our roads in the dark) and allow those who do own cars to leave them at home and choose, instead, to use non-motorized transportation options and public transit.

One public transportation need overlooked by the County is access to the county's many trailheads. The County should encourage public transit routes with bus stops at county parks, trailheads like Little Mountain, Big Rock, Northern State, with more scheduled stops on weekends.

Allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners is one way the County could provide safe non-motorized transportation routes for locals and tourists.

For many years, the County has had plans for completing the Centennial Trail, a safe long-distance off-road route from Snohomish County to Whatcom County. The County once again is proposing to keep the Centennial Trail in its Proposed 2025-2030 Six-Year Transportation Improvement Program (TIP), stating:
"Centennial Trail (Stage 1) This project will design a non-motorized path from Coltrin Road to Clear Lake Park as part of the connection or portion of the Centennial Trail that currently runs through Snohomish County. Survey was completed in 2016 and the County was awarded $215,250 in Federal funding for design of the project. Skagit Public Utility District is currently clearing the trail and installing waterline. We will be seeking additional funding to complete design and construction through various grant programs as they become available."

It's long past time for the County to bring the Centennial Trail to fruition. The County needs to prioritize getting funding **now** for the Centennial Trail.

In 2009 the County's Open Space Concept Plan proposed several multi-use trails in addition to the Centennial Trail that would connect the county's towns, open spaces, and rural areas. Only the Cascade Trail was completed. Suggested long distance trails included:

- Anacortes-Burlington Trail that could extend west from Burlington along SR-20 through the Bayview Ridge UGA to link with the Swinomish Channel and the PNW Trail to LaConner and Anacortes, thereby creating a countywide trail linkage with other major trail systems.
- Swinomish Channel Trail that could extend north from LaConner along the Swinomish Channel to the PNW Trail, providing access to the estuaries and wetlands in Padilla and Fidalgo Bays.
- PNW/Interurban Trail that could extend south from the Interurban Trail in Whatcom County through Bayview to the Swinomish Channel then west through Anacortes to Deception Pass and Whidbey Island
- Skagit-Snohomish Trail that could extend from the Nookachamps south through Mount Vernon and Britt Slough then along the South Fork of the Skagit River to link with Fir Island, Conway, Stanwood and the Snohomish County trail systems.

The County should update the Open Space Concept Plan taking into account the impacts of climate change, and plan for more trails for use by locals and to attract recreationists and eco-tourists like birders, creating a win-win for the County by increasing the tourism economy without increasing the carbon footprint.

Safety: If the County truly wants to decrease its carbon emissions by creating a non-motorized network that will be used by locals and visitors alike, it must plan carefully to make non-motorized routes safe for all users.

The County should begin by mapping and identifying roads, including round-abouts, that are currently too dangerous for walking, cycling, or rolling, and then develop plans to make them safer for non-motorized use. Similar safety measures should be incorporated into other proposed routes, like the Centennial Trail.

WSDOT's "Active Transportation, 2020 and Beyond", details multiple measures that allow walkers and riders to be safe. Two of those measures currently in use at two locations in Skagit County are highlighted, but Skagit County still

has a long way to go before its roads and routes are safe enough to allow walkers, riders, and rollers to use them without fear of harm.

Studies show that the most effective safety measure Skagit County can employ to protect walkers, riders and rollers is to reduce motorized vehicular speed limits along its non-motorized transportation routes. Per WSDOT, between 2010–2019, 86 percent of pedestrian and bicyclist fatalities in Washington occurred on roads with posted speeds of 30 mph or higher—only 14 percent on roads posted at 25 mph or less.

Unfortunately, it is not possible to reduce speed limits along all non-motorized transportation routes, particularly those along our county's highways. However, it is possible to provide ways for walkers and riders to cross high-speed roadways safely and to make travel along them safer. In addition to reduced speed limits, safety measures the County should plan to incorporate into its non-motorized transportation network include, but are not limited to the following:

- Wide shoulders that clearly separate bicycle lanes from motorized traffic. Bicycle lanes on shoulders are safest when well defined by protective barriers, either continuous or broken, rather than simply painting white lines and bicycle icons on the shoulder pavement.

- Bike paths or trails paralleling heavily trafficked routes wherever possible are more protective than bike lanes or wide shoulders.

- Bridges on non-motorized routes must have sidewalks wide enough to accommodate walkers and riders, or barrier protected bike lanes. Almost all Skagit County bridges are too dangerous for walkers and riders. The bridge on Fir Island over the North Fork of the Skagit is one of the most dangerous with no shoulders, let alone sidewalks or bike lanes, and used by semis carrying freight and as a detour route for I-5 due to emergency closures. Not quite as dangerous but particularly unfriendly to walkers, riders, or rollers, is the bridge crossing the Skagit to the west side of Mount Vernon. It has narrow shoulders and a sidewalk on only one side, not wide enough for walkers and riders to use simultaneously.

- Operational tools like bicycle, wheelchair or pedestrian accessible signals for crossing streets, highways and bridges. Such a signal is a safety measure the County should consider, for example, while it awaits funding for replacement of the North Fork Bridge over the Skagit, a cost currently estimated at over $40 million. A signal installed now, informing drivers that a bicycle is crossing the bridge and they must reduce their speed, would be both economically feasible and protective.

- A leading walker/rider/roller interval, which allows pedestrians, cyclists and wheelchairs to get a head start at some crossings.

- Bike boxes that provide a high visibility staging area for bicyclists waiting at red lights.

- Turning opportunities for cyclists: From WSDOT: "a signal can have one phase with the WALK signal on and no left turn permitted for drivers, and a separate phase with DON'T WALK and driver left turns permitted; this provides separation in time." Another example, would be to put restrictions on drivers making right turns on red after stopping which would help to reduce conflicts between turning drivers and pedestrians or bicyclists.

Skagit County's rural and natural areas

My husband and I have lived in Skagit County for nearly half a century. We live here because we love its rural feel, its open spaces, its mountains and waterways, its forests and its wildlife.

I support the following draft PDS proposal policy revisions, with some suggested clarifications and expansions for the County's next draft so that the rural Skagit County will be protected, while providing for resiliency in the face of climate change.

5A-3.1 and 5A-5.1 that stress the importance of protecting wildlife habitat and wildlife corridors. It is important that the County protect wildlife habitat and corridors without fragmentation so that wildlife can easily move about and migrate through our county.

3A(a) that protects the rural landscape, character and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience. The County must work with the cities and towns so that 90%, rather than the currently allocated 80% of new development over the next 20 years occurs in cities and towns, not on rural lands. More rural development will result in increased greenhouse gas emissions as people drive farther to access schools, shops, jobs, and essential services.

CE 6.0 that protects and enhances natural ecosystems so that they support climate change resilience, carbon sequestration, and GHG emissions reduction and
CE 6.6 that protects and manages natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems. I appreciate that the County recognizes that the county's natural environment when protected can function as a tool for sequestering carbon. I hope that the County will add rules and regulations that incentivize landowners to conserve their natural lands as natural carbon sinks.

CE 2.4 that identifies areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands and
CE 10.5 that considers future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle."
These policies are good but don't go far enough. The County needs to consider prohibiting these facilities on other than just Ag land. The County needs to map and develop policy and code concerning the siting of electrical energy generation and storage facilities that indicate where such facilities can be sited with the least conflict, and where they do not belong.

The County needs to add rules and regulations that will encourage use of all currently available sources of renewable energy and newly developing sources of renewable energy.

The County should consider installing community solar arrays, similar to what has been done in Anacortes. Individuals can invest in solar arrays on public buildings and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.

The County should consider the use of thermal energy which following the passage of House Bill 2131, electric and gas utilities may now sell, delivered via a thermal energy network (TEN) Distinct from geothermal energy, TENs use neighborhood-scale highly efficient carbon-free networks of water pipes and ground-source heat pumps to distribute thermal energy for heating, cooling, and domestic hot water, drawing on a number of local non-emitting energy sources (like lakes, rivers, wastewater systems, or the stable temperature of the ground not far below the surface), making clean thermal energy available to all, including renters and lower-income households.

Additionally, by making clean thermal energy accessible to all, including renters and lower-income households, TENs ensure that the benefits of decarbonization are shared widely across communities.

CE 10.1, CE 10.4, CE 10.7 and CE 10.8 that concern sea level rise and the effects of climate change on shorelines.

Skagit County must actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next 3 to 5 years. Skagit County must do a sea level rise vulnerability assessment and make it public. New development must be situated to avoid needing shoreline stabilization. New construction should not occur in tidal and storm surge areas. Additionally, the County must consider and educate the public about adaptations to sea level rise, like dike setbacks or managed retreat.

CE 6.1 "ensures the protection and restoration of streams, riparian zones, estuaries, wetlands, and floodplains to maintain healthy, climate-resilient watersheds." and
5A-5.1 (a) Wetlands (ii) states that "measures shall be taken to protect the natural ability of wetlands to improve the quality of surface water runoff, hold and gradually release stormwater, function as primary producers of plant matter, provide habitat for fish and wildlife, provide recreational opportunities, and provide historical and cultural values."

Beavers create wetlands and protect and restore wetlands, helping to maintain healthy, climate-resistant watersheds. I appreciate that the County in other documents has provided the public with education about living with beavers, and about how to manage beavers when they cause trouble. Given the beavers' role in maintaining healthy wetlands, the County also needs to consider, when possible, ways to incentivize relocation of infrastructure and structures away from areas likely to support or be flooded by beavers.

Thank you for reading and considering my thoughts.

Anne Winkes
18562 Main St,
Conway, WA
98238
Mailing address: PO Box 586, Conway Wa 98238-0586

Tara Satushek Comment # 66

From: Ann Brooking <brookingann@yahoo.com>
Sent: Friday, November 22, 2024 7:28 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Ann Brooking
16465 Dragonfly Lane
Bow, WA 98232

Thank you for considering my input and recommendations:

Stop harvesting legacy forests such as the one being considered for auction on Blanchard Mountain's south side. Make it illegal to cut legacy forests in Skagit County.

Adopt rank choice voting. Use whatever means available to support rank choice voting in the county, in cities and towns to allow the popular vote to prevail rather than allowing large corporations to affect local politics by backing candidates and measures with big money that undercut environmental protections. Keep big money out of local politics in any way possible.

Utilize the term and concept of the very real phenomenon of ecocide to support environmental protections. This organization could be helpful in that regard:

Stop Ecocide International



Stop Ecocide International

Advocating globally for a law of ECOCIDE, making large-scale & systematic destruction of nature an INTERNATIONAL...

Environmental concerns that arise in my mind are the following: unnecessary cutting of forests (a neighbor of mine in Bow cut at least an acre forest on their property. When I asked them what they were planning to do they said, "Oh, we are just making it more sustainable.")
Storm water is a big concern here in Bow with yearly flooding on Colony Road. We saw salmon on the pavement a couple of years ago. Without the degradation of forests, there would not be so much stormwater. Water would be able to be absorbed by the forests and vegetation. Also, friends in Alger are experiencing depletion of their ground water, another indication of too much deforestation. Also

stormwater carries pollutants to the Salish Sea endangering estuaries, the herring, the salmon, the orca, etc.

Watch the documentary "Water is Love"

https://mail.yahoo.com/d/search/referrer=starred&keyword=is%253Astarred&accountIds=1/messages/146149/AJLOV7Zi9KOIZzt_6Ag9YI8Xe7c:2?.src=fp&guce_referrer=aHR0cHM6Ly9sb2dpbi55YWhvby5jb20v&guce_referrer_sig=AQAAAB1c11NVOjnyv1D_jEgi4uDKiViQcaaprJC72mF5LYPeuviqQr6K8Wg-ftoEhuZyDbCL3YJf7773bq6IKow7ntu_xkZLnwK2Hyh9JnRug5Oi3sHirSCtw2j-g3-_lzke6TlJWDJ24HZyIPryL3wzDdO63VktxfCVrpKZAN0xcWSV&fullscreen=1&target=blank

Help solar energy and wind energy to be accessible and affordable for businesses and homes.

Thank you again for your consideration.

Ann Brooking

Tara Satushek

Comment # 67

From: Sarah Pedersen <sarahapedersen@gmail.com>
Sent: Friday, November 22, 2024 10:13 AM
To: PDS comments
Subject: Skagit County 2025 Comprehensive Draft Policies

Resending with my address attached:

I want to thank the County for the strong effort to engage the public in the planning process. Of major concern and interest are, of course, the new elements on climate and housing. I am very pleased to see that the proposed language reflects the efforts of our legislature to assure that local and state-wide planning provide frameworks for the protection of our natural lands and resources, mitigation of climate change, and more just housing. Congratulations on those efforts.

I can't congratulate the Planning Commission however. Their October 8th meeting demonstrated a shocking dereliction of duty and misunderstanding of their role. While they did congratulate the staff for managing the process and following the state-mandated new policy directions, they seemed to think that their perspectives had an overarching importance county-wide. It appears that they think their ideologies, which ignore climate science and population growth, should override the larger interests of the county and state, as defined by elected officials. County Commissioners, the body which the Planning Commission reports to, are elected by the entire county, not just the rural population as represented by this group. That means, I presume, that the Planning Commission should serve the entire county and not just those who depend on our natural resources for their prosperity or identity. It appears that the Planning Commission is in dire need of some diverse representation to include individuals who have the interests of the entire county population in mind. Anyone with the slightest knowledge of environmental issues might help.

Our future presents many conflicting demands. We need housing and we need climate resilience and we all want our county to remain beautiful and liveable. It's a difficult path to tread and it doesn't help if our (unelected) representatives want to bury their heads in the sand and ignore the demands of the future. We don't need different legislators (as suggested by the Commission), we need different appointments to the Planning Commission.

Sarah Pedersen
703 St. Marys Drive
Anacortes WA 98221
(360) 709-9224

Skagit County's 2025 Comprehensive Plan Draft Policies

Sarah Pedersen <sarahapedersen@gmail.com> 10:08 AM (2 minutes ago)

to pdscomments



Tara Satushek

Comment # 68

From: Lisa Ellis <storytimeforest@gmail.com>
Sent: Friday, November 22, 2024 10:55 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I am a resident of Mount Vernon since 2013. I grew up in LA and also lived in Chicago and in a mall town in Iowa.

My Comments are for the 2025 Comprehensive Plan Draft Policies.

It is so crucial for the lives and well-being of all people and the resources we depend on to have the Climate Elements going forward. I am an educator with the MV school system and volunteer with many organizations. If we do not have these elements in our plan, development will not move adequately and will increase climate disasters such as more flooding and high heat in the summer if development moves into more critical habitats needed for sustaining the whole of the Skagit region.

I have already seen the temperature increase over the years where there are more paved areas and fewer trees replanted to reduce heat in populated areas. I see beautiful places people go to get degraded if there are no policies in place for the care of these destinations as we have more people coming from WA and around the country. The rivers and ocean areas have had toxic blooms and other dangerous bacteria develop when the health of the ecosystem is not cared for. Here are my more specifics to my suggestions based on collaborating with people in science field who study the affects of regions that have been overpopulated without these in their plans.

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.
2. Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.
3. Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.
4. Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high-risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

Lisa Ellis
712.299.4517
426 Tristan Place
Mount Vernon, WA

Tara Satushek Comment # 69

From: Kate Smith <katherine.selting@gmail.com>
Sent: Friday, November 22, 2024 9:46 AM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear County Comprehensive Planning Committee,
Thank you for your thorough work on the Climate Element and for including Resilience in the comprehensive plan draft. I support much of the proposed policy revisions and would like to make the following additional comments for the Skagit County 2025 Comprehensive Plan Draft Policies for the Climate Element.

I recommend the establishment of an Environmental Advisory Board (EAB) to report to and make recommendations to the Skagit County Commissioners for policy decisions based on the best available science. The EAB should be made up of diverse representatives from the community with either professional expertise and lived experience.

CE 1.2: Recommend : Include 10% target for conversion of agricultural production to organic or regenerative production with the development of a supporting Organic/Regenerative Action Plan. The number of farms farming organically increased from 5% (2017) to 7% (2022), but % acreage may be a more important target for climate mitigation. Agroforestry practices should be promoted as well.

CE 1.6: Recommend: Adjust Farmland Legacy Program to consider the impact of selling off development rights for larger parcels that reduces the opportunity for small/mid size acreage family farms with housing for purchase by next generation farmers.

CE 10.3 Recommend: Skagit County should actively plan for sea level rise and climate change by updating the Shoreline Master Program and conduct a sea level rise vulnerability assessment to be made public.

CE 10.4 Recommend: Require that new development be situated to avoid needing shoreline stabilization.
Recommend: Add language that avoids construction in tidal and storm surge areas.

CE 10.5
Recommend: The County should plan now for clean energy installations, mapping and developing policy and code concerning the siting of electrical energy generation and storage facilities. The County should indicate where such facilities (including community solar arrays, battery storage etc) can be sited with the least conflict, and where they do not belong.

CE 6.6
Recommend: Recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their important role in carbon sequestration. In addition, forest lands without development are easier to manage during wildfires, and grasslands, wetlands, and marginal agricultural land can hold flood waters thus protecting homes and businesses.

CE 7.0
Recommend: Development of multi-use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities. Focus efforts on connecting existing bike lanes and trail systems to locations of importance including downtown businesses areas, parks and places of community interest.
Recommend: Identify and map roads and bridges that are dangerous for cyclists and pedestrians and develop plans to make them safer by adding shoulders, bike lanes and pedestrian bridges (downtown Mount Vernon) to reduce passenger car vehicles driven by both residents and visitors (for example during Tulip Festival).
Recommend: Allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.
Recommend: Prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. Develop additional trails to attract recreationists and eco-tourists like birders which would increase the tourism economy without increasing the carbon footprint.

CE 8.1
Recommend: Development section of Solid Waste Management Plan for compliance with Organics Waste Management Law to reduce methane production from food waste as well as minimize cost for County to transport heavy organic waste to landfills. This would include capacity assessment for composting facilities to accept increased residential organic waste, process compostable plastics, and incentives for residents to subscribe for organic waste pick up.

CE 9.4
Recommend: Water rights should be managed with regard to other policies including CE 4.2. Water rights should also be accessed with regard to implementation of soil health practices for improved water holding capacity and drought resistance.

--
Katherine Elaine Selting Smith
17622 Greenacres Rd.
Mount Vernon, WA 98273

LORING ADVISING

Comment # 70

By Email

November 22, 2024

Skagit County Planning & Development Services
1800 Continental Place
Mount Vernon, WA 98273
pdscomments@co.skagit.wa.us

Re: Skagit County's 2025 Comprehensive Plan Draft Policies – Climate and Environmental Policies

Dear Skagit County Planning & Development Services:

Evergreen Islands appreciates the efforts that Skagit County has made to draft new climate change goals and policies and to update environmental goals and policies as part of its Comprehensive Plan update. After having had an opportunity to review the Skagit County 2022 Green Gas Emissions Analysis and the First Drafts of the new climate policies, the climate updates to other Comprehensive Plan policies, and the updated Critical Areas policies, we offer the following comments:

- **Climate Element.** We appreciate and fully support the robust new climate goals and policies that would constitute the Climate Element. We recommend a few additions, as follows:

    - **Environmental Advisory Board (EAB).** We recommend that Skagit County establish an EAB to provide recommendations on goals, policies, and development regulations related to climate change and sea level rise. The EAB would consist of people with professional and lived experience regarding environmental issues like climate science, wildlife corridors and habitat, sea level rise, and shoreline processes and conservation.

    - **CE 5.0. Economic Development.** We recommend the addition of a policy promoting a transition from high carbon intensity industries and commercial activities to low carbon intensity industries and commercial activities.

    - **CE 7.0. Transportation.** We recommend the addition of a policy promoting increased nonmotorized transportation to support the goal of reduced Vehicle Miles Traveled. While proposed revisions to the Transportation Element appear to address nonmotorized transportation, adding the policy above in the Climate Element will increase consistency and send a stronger message.

- **CE 10.1.** We recommend a more thorough treatment of the landslide risk likely to be exacerbated by more severe storms. This could be achieved with:

    - an updated identification, mapping, and zoning of high-risk areas for flooding and landslides and strict limitations on new development and major redevelopment in these areas;

    - the addition of a training policy, such as: "Skagit County will develop internal resources and training materials for staff to use when reviewing permit applications that involve proposals with landslide risks."

    - a focus on reducing landslide and flooding hazards and risks at the scale of the risk, rather than at a parcel scale, to reflect the geographic extent of shoreline processes and geologic hazards.

- **Environmental Policies.** To ensure the protection of critical areas required by Washington's Growth Management Act, we recommend that Skagit County decline to make the following revisions identified in the first draft:[1]

    - Preserve and protect wetlands to ~~prevent their continual loss and degradation~~ maintain no net loss of wetland functions and values. Comp Plan Goal 5A.

    - Minimize risk to life, property, infrastructure, and resources caused by ~~disrupting geologically hazardous areas or by locating development in areas subject to~~ naturally hazardous geologic processes. Comp Plan Goal 5A. *This text provides helpful instruction for residents and County staff alike in contemplating areas for new development.*

    - ~~Skagit County shall protect and conserve critical areas in cooperation with federal, state, local, and tribal jurisdictions~~. Comp Plan Goal 5A-5. *We do not believe this is overly repetitive, and provides the necessary goal for the following associated policies*.

    - Critical Areas shall be designated and protected to maintain no net loss of wetland functions and values ~~prevent their continued loss and degradation~~. Comp Plan Policy 5A-5.1. *Based on the scientific literature that demonstrates*

[1] As shown in the drafts, the revisions mark proposed deletions with strike-through and proposed additions with underline.

that wetland mitigation efforts typically fail, t*he original language is more likely to achieve protection and no net loss of wetlands and their functions and values.*

- Mitigation projects shall, whenever feasible, ~~contribute to an existing wetland system or restore an area that was historically a wetland~~ achieve no net loss of wetland area and provide equivalent or greater functions and values. Comp Plan Policy 5A-5.1(iii). *The scientific literature indicates that creating new wetlands is not likely to compensate for impacts to existing wetlands, and thus the existing language should be retained to promote mitigation in areas proven to function as wetlands.*

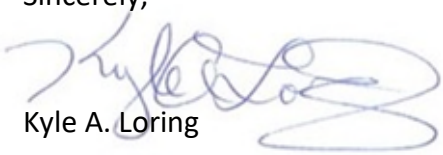
- ~~Regulated wetlands and their associated buffer zones shall be protected from adverse impacts to their overall functions. No wetland or buffer zone alteration should be authorized unless it can be shown that the impact is unavoidable and that the adverse impacts are offset by deliberate restoration, creation or enhancement of wetlands and buffer zones~~. Comp Plan Policy 5A-5.1(vi). *While the reasons for deleting this text appear to include deleting duplication, this text provides more specific instructions than the general mitigation sequence.*

- (b) Land used for critical area mitigation should be preserved in perpetuity. ~~Monitoring and maintenance of critical area mitigation sites shall be provided until the success of the site is established~~. (c) A minimum ~~M~~monitoring period should be established to ensure ~~of the~~ successful establishment of approved mitigation plans. ~~site should take appropriate measures utilizing one or more of the following: (i) Applicants should develop comprehensive mitigation plans in order to ensure long-term success of the mitigation project. Such plans should provide for sufficient monitoring, maintenance, and contingencies to ensure mitigation persistence~~. Comp Plan Policy 5A-5.4. *By revising the mandatory "shall" to "should" for monitoring and maintenance of mitigation sites, the new language would no longer ensure that mitigation functions as required for the project. In addition, while there may be some redundancy in the second portion of deleted language, it nevertheless provides useful instruction and should be retained.*

- (d) Critical area mitigation proposals should ~~improve overall~~ provide equivalent or greater critical area functions, recognizing that it may be inappropriate to impact certain critical areas. All critical area functions shall be considered. Comp Plan Policy 5A-5.4. *The text to be removed acknowledges the reality that the*

implementation of mitigation proposals typically results in a decrease in critical area functions and values, and thus should be retained to promote the aspirational goal of improved functions.

Sincerely,



Kyle A. Loring

Tara Satushek

Comment # 71

From: Brenda Cunningham <brenda.cunningham1@outlook.com>
Sent: Friday, November 22, 2024 11:57 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies - resubmitted with complete address

Dear Planning and Development Services staff,

Thank you for the opportunity to comment on the draft policy updates. The following comments are submitted by Indivisible Skagit regarding changes to the Environment element and the new Climate element. Indivisible Skagit is a local organization committed to engaging the community in positive changes that lead to a more equitable and sustainable future for Skagit County and the country. We are more than 1400 members strong.

Environment Element:
We support the insertion of specifics regarding no net loss of wetlands and the importance of preserving tree canopy and connections. Also, the insertion of references to climate change regarding flood protections and the cooperation with state and federal agencies. Consistency across jurisdictions will foster greater stability for citizens as well as businesses navigating the changing environment. Many of the policy additions addressing climate change will result in the protection of more forest and farm resources in Skagit County. We support the recommendation of siting infrastructure away from the 500-year floodplain. We are seeing 100-year flood events every 5 or 6 years on the Skagit River and dealing with many developments that were permitted in hazardous areas. We recommend stronger protection to keep people out of harm's way and to site essential services to be available during times of crisis.

Climate Element:

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners, and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

2. Require the use of sea level rise models and updated flood hazard mapping when making decisions regarding zoning and allowed uses. These maps should be made public so that landowners and the greater community can be informed.

3. Shoreline stabilizations – we support the policy that requires landowners to demonstrate a need before permitting stabilization. Stronger language should be added that requires landowners to demonstrate how their stabilization will not negatively impact neighboring properties by reducing accumulation of sediments further down drift cells.

4. Buildings and energy – there are many policies in this section that we support. They should go further in incentivizing construction to incorporate green energy features, including making community solar more accessible to everyone.

5. Land use - Protect the rural character of Skagit County by reducing residential development outside the cities. Rural development results in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services. Recognize the value of conserving rural lands including

agricultural lands, forests, and wetlands because of their important role in carbon sequestration. Rural development reduces the land base for farming and forestry in Skagit County.

6. Land use - Protect forest lands from conversion to residential use. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.

7. Update the geohazard maps and prohibit development in areas susceptible to landslides and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

We support many of the recommended policies in the Climate Element. We support the acknowledgement of the importance of waste management, water resources, multi-modal transportation and the protection of forests to the resilience of Skagit County. It is in the best interests of the community that our county plan for the future, utilizing all available resources to protect the existing natural and agricultural values of this amazing place.
Sincerely,
Indivisible Skagit Support Team, all residents of Skagit County

Christie Stewart Stein
Christine Kohnert
Brenda Cunningham
Lisa Ellis
Roger Phillip

Submitted by Brenda Cunningham, 1218 S 13th Street, Mount Vernon, WA 98274

Tara Satushek Comment # 72

From: Timothy Manns <t.manns1@outlook.com>
Sent: Friday, November 22, 2024 11:42 AM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

November 22, 2024

Skagit County Planning and Development Services
Comments on "Skagit County's 2025 Comprehensive Plan Draft Policies"
1800 Continental Place
Mount Vernon WA 98273

Re: Comments on the Periodic Skagit County Comprehensive Plan Update – Climate and Environment Elements (Note – A paper copy of this letter was delivered to PDS at Continental Place on Nov. 22nd. The paper version includes the footnotes which we were not able to include below due to software limitations.)

Dear Skagit County Commissioners, Planning Commission, and Planning & Development Services Staff:

I am writing on behalf of Skagit Audubon Society to offer comments on the draft update of the Skagit County Comprehensive Plan's Environment Element and the new Climate Element. We appreciate the opportunity to participate in the update process and have attended several of the open houses to contribute comments there.

Skagit Audubon is the local chapter of the National Audubon Society. Our 497 members share an interest in birds and other wildlife and in protecting and restoring the habitats on which they depend. In addition to rivers, streams, the marine environment, and undeveloped land, these habitats include agricultural lands and working forests which are also important for wildlife. Skagit Audubon's members value the birds, varied habitats, and protected rural character of our county, and we want the Comprehensive Plan policies to protect these while also proactively moving our community towards a green energy future.

The *Skagit County Climate Action Plan*, dated March 16, 2010, opens with this statement from the County Commissioners:

> "When Skagit County embarked on its Climate Action and Sustainability Initiative in June 2008, we did so with the intention of committing ourselves fully to reduction of our greenhouse gas emissions and sustainable use of our resources. Today, in an economy still deep in recession, we find that commitment a bit harder to keep, but no less important. The savings we reap from implementing the policies in this plan will benefit the residents and taxpayers of Skagit County for years to come. While the energy savings will allow us to reduce our carbon footprint and do our part to combat climate change, the financial savings will empower us to continue providing the high levels of service our constituents demand and deserve."[1]

Skagit Audubon members would like to see the same determination and commitment of fourteen years ago in the Climate Element and related parts of the Comprehensive Plan, recognizing our county as having an important role to play in addressing climate change. We hope to see a strong commitment to implementing the policies of the Comprehensive Plan. There was no time to lose in 2010, and there is much less time to lose now.

I would note that in our comments the emphasis on addressing climate change and its effects supports our mission in that National Audubon research has identified climate change as the single greatest threat to birds.[2] Audubon Washington's 25 chapters, including Skagit Audubon, and its thousands of members advocated vigorously for passage of HB 1181, which calls for addressing climate change in Comprehensive Plans. Dealing with climate change is a challenge requiring action at every level: by individuals, towns, counties, states, and the nation. As

residents of Skagit County, we want our county, just as our state, to be a leader in addressing this challenge. The draft Climate Element policies are a good start, and we call on you to include them in the final updated Comprehensive Plan largely as written, with some recommended strengthening,.

The draft policies under the Climate Element and the suggested updates to the Environment Element contain many good ideas. There are none that we would ask you to delete. We offer the following comments and suggestions.

Climate Element

1. **Goal CE 10.0 Climate resilience; Drought; Land use; Sea level rise; Flooding[3]**
   We strongly support this goal for zoning and development as written:

   > *"Enhance community resilience by integrating climate change projections into land use, infrastructure planning, and development regulations, ensuring long-term safety from sea-level rise, flooding, wildfires, and other climate-exacerbated hazards while protecting natural ecosystems."*

   It is appropriate, and in fact essential, that the Comprehensive Plan address sea level rise as an important climate change effect, which it does at a number of points. We are very concerned, however, that the draft update of Skagit County's Shoreline Master Program (SMP) does not address sea level rise. We strongly urge the County not to wait to update the SMP until it is again required by law, but to begin as soon as possible to address sea level rise in that plan too.

2. **Policy CE 10.2[4]**
   > *"Consistent with State and Federal standards, plan and build facilities, utilities, and infrastructure projects to mitigate or withstand flooding from rising sea levels and changing precipitation patterns."*

   Please either expand this policy or write a separate one to address existing facilities and infrastructure in harm's way from sea level rise, increased flooding, or coastal erosion. The policy as written addresses only future construction. Assets at risk need to be mapped and then prioritized for adaptive measures or relocation.

3. **Policy CE 10.4[5]**
   > *"Require that proposals for shoreline stabilization demonstrate a need and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise."*

   Rising sea level and storms of increased severity could motivate shoreline residents to install new or more robust hard armoring. Ultimately, this approach will be futile and will further degrade shoreline processes. We at Audubon are concerned that armoring shorelines destroys the spawning habitat needed by forage fish such as smelt and sand lance. These small species are the base of the marine food chain for salmon, seabirds, marine mammals, and ultimately orcas. We believe that Skagit County should collaborate with the appropriate state and federal agencies to proactively identify and map areas where shoreline residents are at risk from sea level rise. Furthermore, we urge Skagit County to have a policy of incentives, for example through a Transfer of Development Rights program, for shoreline residents living in harm's way to relocate. Policy CE 10.4 should more strongly discourage building where any type of shore stabilization would be needed and should include programs to dissuade such development.

4. **Policy CE 10.7[6]**
   > *"Protect and restore coastal ecosystems to increase the resilience of species, habitats, and communities to climate change."*

We strongly support this policy. Please make it more specific to Skagit County, mentioning that as sea level rises what few remaining acres of salt marsh remain will be lost against coastal dikes. To retain and expand the ecosystem services which salt marshes provide by absorbing storm wave impact and reducing coastal erosion, the dikes must be repositioned inland. This also needs to be done to avoid losing key habitat for many avian and marine species.

5. **Policy CE 2.4[7]**

   "Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."

We strongly support this policy consistent with our September 23, 2024, letter to the Energy Facility Siting Evaluation Council opposing the Goldeneye Battery Energy Storage System proposal and our October 24, 2024, comments on the draft revised Comprehensive Plan Utilities Element. There are places in Skagit County appropriate for facilities associated with energy production, storage, and transmission with minimal impact to the environment. It is important for Skagit County to identify these locations in advance of proposals being submitted for permitting.

6. **Policy CE 3.1[8]**

   "Expand and bolster efforts to reduce the negative impacts of natural hazards, such as appropriate hazard identification, warning, dissemination of relevant information and data, and public outreach."

The best available science predicts higher rainfall, more frequent storm events, and changing flooding patterns for Skagit County. In light of these predictions, there should be a policy to soon, and then more frequently, update the map of natural hazard areas and to develop less flexible regulations concerning development in those areas. It has been too easy for property owners to obtain permission to build in areas prone to landslides, shoreline erosion, debris flows, and flooding. Building in such hazardous places will become less and less tenable, putting the county in the position of increasingly responding to dangerous and expensive emergencies.

7. **Goal CE 6.0[9]**

   "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."

We are strongly in favor of all the policies proposed under this goal. Consistent with the Audubon mission, we suggest adding "and retention of wildlife" to the above statement so that it reads, "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, GHG emissions reduction, and retention of wildlife." The presence of diverse wildlife, especially birds, is one of the characteristics of Skagit County most important to our membership.

8. **Policy CE 6.6[10]**

We strongly support natural climate solutions as part of the mix in addressing the effects of climate change, and propose the following revised language:

"Protect and manage natural lands (forests, grasslands, wetlands, eel grass meadows, and salt marsh) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems." (new language underlined)

County policies should strive to protect this function by actions to retain and expand these types of near shore environments.

Integration of Climate into other Comprehensive Plan Elements

9. **Policy 9A-5.1**[11]

We would like to see stronger wording about phasing out fossil fuels in heating buildings as this is a major source of greenhouse gas emissions in Skagit County.[12] We propose the following revised wording:

> *"Non-renewable Resources – Energy generation from non-renewable resources, such as natural gas, shall be phased out where possible, and the county will explore the use of renewable energy sources in both new and existing buildings."* (substituted word underlined)

There should be an emphasis, too, on equipping Skagit County buildings with solar panels to supply as much of the energy need of the given facility as possible.

10. **Policy 9A-5.5**[13]

We strongly support the policy as stated:

> *"In parallel, support the transition of high carbon emitting sectors, including oil refining and industrial gas manufacturing, to low carbon processes or industries."*

11. **Policy 9A-5.6**[14]

We propose the following revised language:

> "*The use of solar energy for water and space heating shall be encouraged and incentivized, including on existing and new commercial and industrial buildings. Where needed, ordinances shall be developed to protect solar access, particularly in high-density and overburdened communities, to enhance energy resiliency and equity. Skagit County will strongly encourage development of community solar projects on county-owned buildings and above county-owned parking areas.*" (changed or new language underlined)

Community solar installations could provide residents with the opportunity to invest in solar power when their own properties do not have the appropriate location for solar panels or when they cannot afford the cost of a complete installation. Anacortes has several examples on public buildings already.

Environment Element

12. **Policy 5A-3.1**[15]

> *"Wildlife corridors and connections between areas of native vegetation, riparian corridors, that connect wetland systems, and open space should be conserved and protected whenever feasible through incentive programs."*

We strongly support this and other policies to identify, enhance, and protect wildlife corridors.

13. **Policy 5A-5.1(d)(i)**[16]

We support this policy, but propose strengthening it by deleting "as feasible" to read as follows:

> *"(i) Landscape-scale habitat corridors shall be considered in stream/riparian and wetland buffer regulations to protect habitats associated with riparian dependent species."*

14. **Policy 5A-5.3(d) Geologically Hazardous Areas**[17]

Please refer to our number 6 above. The wording of 5A-5.3(d) allows too much leeway for building in geohazard zones. Here and in Snohomish County we have seen the destructive and potentially catastrophic potential of too lax policies around development in hazard zones. This potential will only increase with greater storm severity and other effects of climate change.

15. **Environmental Advisory Board**
    We understand that other organizations and individuals are urging the Board of County Commissioners to establish an Environmental Advisory Board to support their decision-making on such things as climate change-related actions. This is an excellent idea, and we support it. The technical aspects of some of the challenges facing Skagit County call for specialized expertise to aid our County Commissioners in making sound decisions based on the best available science.

Thank you for your attention to our comments. We look forward to seeing future iterations of the Comprehensive Plan updated policies.

Sincerely,

/s/ John Day

John Day
For the Skagit Audubon Board
Skagit Audubon Society
PO Box 1101
Mount Vernon, WA 98274

[1] P. 6, CAP 2010 Adopted.pdf
[2] https://www.audubon.org/climate/survivalbydegrees
[3] P. 2, *2025 Skagit County Comprehensive Plan First Draft, Climate Element,* SkagitCounty_ClimatePoliciesV1.2_1015_PlanningCommission_clean.pdf
[4] Ibid, p.2
[5] Ibid, p.3
[6] Ibid, p.4
[7] Ibid, p.5
[8] Ibid, p.5
[9] Ibid, p.9
[10] Ibid, p.10
[11] P. 7, Comprehensive Plan Element: All Elements (Climate Integration), SkagitCounty_ClimateIntegration_PlanningCommission_0115.pdf
[12] P. 6, CountyGHGAnalysisReport_Skagit.pdf
[13] P. 8, Comprehensive Plan Element: All Elements (Climate Integration),
[14] Ibid, p.9
[15] P.5, 2025 Skagit County Comprehensive Plan First Draft – Environment Element, SkagitCounty_EnvironmentalPolicies_PlanningCommission_1015.pdf
[16] Ibid, p.11
[17] Ibid, p.14

Comment # 73

Tara Satushek

From: Kathy Malley <kathy@snowmesa.com>
Sent: Friday, November 22, 2024 12:47 PM
To: PDS comments
Cc: Allen Bush (bushman@mail.com); Gabe Murphy; Jep Burdock (jepburdock48 @gmail.com); pinotmaster@msn.com; Stephen Orsini (sailingorsini@gmail.com)
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Regarding Skagit County's 2025 Comprehensive Plan update, the Guemes Island Planning Advisory Committee (GIPAC) would like to thank the County for embarking on a timely and thorough update of its comprehensive plan to address climate change and its impacts. The new chapter on climate is impressive in its scope and content. We applaud the county for taking a broad view by addressing climate impacts across multiple sectors and looking to reduce future greenhouse gas emissions.

It is an ambitious plan, setting out intentions, goals and strategies. Consequently there are many unknowns as to how and when these policies will be implemented. We look forward to learning more about the County's plan to prioritize and implement elements of the comp plan once it is adopted.

At this time, GIPAC would like to provide some comments on the Climate Element specific to the concerns of Guemes Island:

Water Resources, CE 9.2, Climate resilience, Wildfire, Drought

We recommend adding additional language to this section. This change aligns with the recent policy adjustment by the county regarding well-drilling in sole-source aquifer and seawater intrusion areas: "Assess and implement resilience strategies to reduce the vulnerability of Skagit's aquifers, wastewater systems, and septic systems to seawater intrusion, flooding from rising sea levels, and changing groundwater tables. In known areas of seawater intrusion, critical areas, and sole source aquifers, implement geo-hydrologic review of new wells prior to drilling whether or not related to a building permit application. Move well drilling review and enforcement of water quality standards into Skagit County Health Department."

Related to this is **5A-5.1 Protection and Conservation Measures** where we support the revised policy language: "Skagit County will identify and implement strategies in its Saltwater Intrusion Policy to prepare and mitigate for the effects of saltwater intrusion into its aquifers and drainage systems for the most vulnerable islands and coastal areas."

Water Resources, CE 9.3, Climate resilience; Drought; Built Environment

For several years, GIPAC has been advocating rainwater catchment as a viable source of potable and non-potable water. We applaud and support the call-out of rainwater catchment as a strategy to conserve water resources. We suggest some additional language to continue to drive this change forward: "Support water conservation practices such as rainwater catchment, onsite retention, and water reuse to conserve water resources. Adopt a rainwater catchment template to reduce cost in design and implementation for home-based catchment systems."

Zoning and Development, CE 10.0, Climate resilience, Drought; Land Use; Sea Level rise; Flooding

We greatly appreciate and support the overarching goal for the zoning and development sector with its focus on community resilience: "Enhance community resilience by integrating climate change projections into land use, infrastructure planning, and development regulations, ensuring long-term safety from sea-level rise, flooding, wildfires, and other climate exacerbated hazards while protecting natural ecosystems." This will require a new approach to planning, which will hopefully lessen the impact of climate change for County residents over the coming decades.

Zoning and Development, CE 10.1, Climate resilience, Sea Level rise

We support "Work with regulatory agencies to develop regulations for elevating or setting back new and substantially improved structures located within mapped sea-level rise hazard areas to reduce the risk and damage caused by sea-level rise."

Skagit County needs to actively plan for sea level rise and we recommend an early priority be the completion of a sea-level rise vulnerability report, which is then made widely available. Additionally, sea-level rise needs to be incorporated in the update of the Shoreline Master Program.

Zoning and Development, CE 10.4, Climate resilience, Sea Level rise

We support "Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea-level rise."

New development should be situated so that it avoids the need for shoreline stabilization, and boulders should not be classified as soft armoring. We support the idea of promoting a Shore Friendly program to educate private landowners about how to reduce shoreline armoring. Finally, using the sea-level vulnerability report, Skagit County could identify tidal or storm surge areas and avoid development in those areas.

Land Use & Ecosystems, CE 10.6 Climate resilience, Wildfire; Extreme Heat; Extreme Precipitation

As a forested island with limited water and evacuation challenges, we support the "Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards."

Additionally we **support the policy revision in 4B-2.11 Wildfire Resilience Strategy**. "Develop a comprehensive, county-wide wildfire resilience strategy to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires."

Land Use & Ecosystems, CE 6.0 Climate resilience, Ecosystems

We support the overarching goal for the Land Use and Ecosystems Sector: "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."

We also **support CE 6.6 GHG reduction, Land Use:** "Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems." Recognizing the value of rural lands and their various and important roles in carbon sequestration will not only protect the rural character of our Skagit County, these lands can protect people, businesses and homes from the damaging effects of climate change.

Transportation, CE 7.0 GHG reduction; Transportation

We support the overarching goal for the transportation sector: "Promote transportation resilience to climate impacts and reduce the miles traveled while prioritizing benefits for overburdened communities."

Related to this is **8A-1.3, Systems,** where we support the policy change: "Multi-modal transportation – Participate in the planning and implementation of multi-modal transportation systems to increase the mobility of all users, especially in underserved communities and provide affordable, accessible and reliable alternatives to passenger car to reduce vehicle miles traveled and greenhouse gas emissions.

As a ferry dependent community for all food and services, ensuring better public transit options to Anacortes, Skagit County and beyond is critical to reducing vehicle miles travelled for Island residents. This needs to include easy pick-up

on the Anacortes dock for those with accessibility needs and better schedule alignment with the ferry schedule. It could also include transit services on the Island.

Transportation, CE 7.5 GHG reduction; Transportation

We support "Seek to reduce greenhouse gas emissions and air pollutants from County-owned vehicles, equipment, and machinery, where feasible using clean fuel technologies including but not limited to bio-blend fuels or converting to electric or hydrogen power."

The fate of the all-electric ferry planned for Guemes Island is unknown and ultimately may prove too expensive. Given this, the current vessel will need an overhaul and any replacement engines should be the cleanest, most fuel efficient diesel engines available. Additionally, when the County does moves forward with a replacement vessel, building a hybrid boat, similar to what they are planning for in Whatcom County and the state ferries, would be an important step toward meeting the CE 7.5 goal.

Thank you for considering this input.

Sincerely ~

Kathy Malley
President, GIPAC

GIPAC address: Mailbox 829, 1004 Commercial Ave. Anacortes. 98221
My personal address: 6469 Edens Rd Anacortes, WA 98221

Comment # 74

Tara Satushek

From: Emma Hite <emma.e.hite@gmail.com>
Sent: Friday, November 22, 2024 1:14 PM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Spam

To whom it may concern,

My name is Emma Hite and I am writing to comment on Skagit County's 2025 Comprehensive Plan update. My address is: 15407 Colony Road, Bow, WA, 98232. I have been a resident of Skagit County since 1993, returning in 2016 to live full-time in the county after pursuing higher education and working internationally as an archaeologist. I now help operate our family farm in Bow, where we raise dairy sheep to produce lamb, yogurt, and a variety of cheeses.

I love living in Skagit County. My experiences elsewhere in the US and abroad helped me realize how precious and remarkable our county is. We remain a holdout for farming, rural ways of life, and ecological diversity in a part of Washington State that has otherwise been swallowed up by strip malls and suburbs. We truly live in the most beautiful place in the world. Yet I am very concerned about the future of our county, which is threatened by profit-seeking developers, outside corporate interests, and global climate change.

Today I will comment specifically on how our 2025 Comprehensive Plan update should address the threats posed by climate change to Skagit County and our unique way of life. My comments consist of a series of actions I recommend or support across six categories: 1) establishment of an Environment Advisory Board (EAB); 2) expansion of sea level rise policy revision; 3) changes to policy revision for rural lands conservation and reduction of carbon emissions; 4) adding to energy conservation, generation, and storage policy revisions; 5) expansion of forest resource lands wildfire strategy; and 6) expand the use of multi-model transportation to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT).

My full comments are as follows:

1) RECOMMEND THE ESTABLISHMENT OF AN ENVIRONMENTAL ADVISORY BOARD

Background: Skagit County's natural environment is multi-layered with a variety of diverse ecosystems, open space, and critical areas. County policy states that decisions about these complex areas will be based on "best available science", yet Skagit County does not have an Environmental Advisory Board (EAB) to assist county decision makers in addressing environmental issues that are made increasingly complex as the impacts of climate change intensify.

a) Recommend: Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners and the Planning Department look at environmental issues

holistically and make decisions based on the best available science. In addition to researchers, scientists, and educators, the EAB could include younger people and underserved people so the commissioners could hear from people who do not usually have the opportunity to contribute to environmental policy planning.

An EAB would report to and make recommendations to the Skagit County Commissioners on natural resource and environmental plans, policies, and programs. Examples include legislation affecting natural lands, open space, waters and wildlife habitat; land use decisions affecting the long-term sustainability of natural processes like rivers and marine shorelines; natural solutions to improve climate preparedness; environmental justice and environmental stewardship.

An EAB could ensure that best available science is consistently included in local planning. It could maintain active outreach to county partners, stakeholder groups, tribal governments, and underserved community members.

2) EXPAND SEA LEVEL RISE POLICY REVISION

a) Support: Proposed policy revision CE 10.3 “Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow,

and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling."

b) Recommend: Skagit County should actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years.

c) Recommend: A sea level rise vulnerability assessment and make it public.

d) Support: Proposed policy revision CE 10.4 "Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise."

e) Recommend: Do not classify boulders as soft armoring.

f) Recommend: Require that new development be situated to avoid needing shoreline stabilization.

g) Recommend: Add language that avoids construction in tidal and storm surge areas.

3. MAKE CHANGES TO POLICY REVISION FOR RURAL LANDS CONSERVATION AND REDUCTION OF CARBON EMISSIONS

a) Support: Proposed policy revision 3A(a), "Protect the rural landscape, character, and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience." Thank them for adding "resilience" to the Comprehensive Plan draft.

b) Support: Proposed policy revision 6.0 “Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction.”

c) Support: Proposed policy revision 6.6 “Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems.”

d) Recommend: Recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their important role in carbon sequestration. In addition, forest lands without development are easier to manage during wildfires, and grasslands, wetlands, and marginal agricultural land can hold flood waters thus protecting homes and businesses.

e) Recommend: Delete existing policy 3A(b) “Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities.” Goal 3A(b) allows an increase in rural housing densities which would change Skagit County’s rural landscape, character, and lifestyle. It would increase GHG emissions by increasing vehicular miles driven.

f) Recommend: The County needs to prohibit more development outside of cities, towns, and urban growth areas. Rural development will result in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services.

4. ADD TO ENERGY CONSERVATION, GENERATION, AND STORAGE POLICY

REVISIONS

a) Support: The draft revision emphasizes increased use of clean energy sources and a reduction of burning fossil fuels for energy.

b) Support: Proposed policy revision CE 2.4 “Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands.”

c) Support: Proposed policy revision CE 10.5 “Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle.”

d) Recommend: The County should consider installing community solar arrays, similar to what has been done in Anacortes. Individuals can invest in solar arrays on public buildings and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.

e) Recommend: The County should plan now for clean energy installations, mapping and developing policy and code concerning the siting of electrical energy generation and storage facilities. The County should indicate where such facilities can be sited with the least conflict, and where they do not belong.

5. EXPAND FOREST RESOURCE LANDS WILDFIRE STRATEGY

a) Support: Proposed policy revision CE10.6 “Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards.”

b) Support: Proposed policy revision 4B-2.11 “Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires.”

c) Recommend: the County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people

are not tempted to build homes where they may be impossible to defend from wildfires. Other vulnerable communities are no longer allowing development in fire prone forests and wildlands.

6. EXPAND THE USE OF MULTI-MODAL TRANSPORTATION IN REDUCING GREENHOUSE GAS EMISSIONS (GHG) AND VEHICLE MILES TRAVELED (VMT).

a) Support: Proposed policy revision 8A-1.8 Multi-modal transportation. "Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."

b) Support: Proposed policy revision CE 7.1 "Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions."

c) Recommend: Development of multi-use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities.

d) Recommend: Identify and map roads and bridges that are dangerous for cyclists and develop plans to make them safer by adding shoulders or bike lanes.

e) Recommend: Allowing public access on dikes for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.

f) Recommend: Prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. Develop additional trails to attract recreationists and eco-tourists like birders which would increase the tourism economy without increasing the carbon footprint.

I hope that you will incorporate my recommendations and supported actions when drafting updates to the Skagit County Comprehensive Plan. Thank you for your time and consideration.

Sincerely,

Emma Hite

15407 Colony Road

Bow, WA 98232

Tara Satushek Comment # 75

From: Joyce <expressing.joyce@gmail.com>
Sent: Friday, November 22, 2024 1:17 PM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

I have lived and worked in Skagit County since the early 1970's. I love living in our amazing county and want to help protect our rural county with its farmlands, forest lands, Skagit River, salmon, wetlands, shorelines and lakes for our future generations.

I am concerned about the increasing amount of flood and fire events that have been occurring in greater frequency in our area and the effects of the global climate crisis. I have lost two of my friends to landslides that were caused by heavy rainfalls on deforested hillsides, one on Highway 9 and the other in Oso. In past decades, I had to evacuate from two different rentals due to rising flood waters.

I would like the commission to implement the following recommendations:

1. Update the geohazard maps and prohibit development in areas susceptible to landslides, flooding and other hazards. Increased rainfall, combined with the removal of forest cover, creates high risk areas where building should be prohibited. Proactively identify these areas and take action to keep the public safe.

2. Establish an **Environmental Advisory Board (EAB)** to offer guidance and expertise to the County Commissioners and the Planning Department to help make the decisions which will ultimately be a part of the Comprehensive Plan. Ideally, the EAB would be made up of professionals with knowledge in a variety of environmental issues, as well as members of the public who have lived experiences, including younger people, Tribal members, and underserved people who do not usually have an opportunity to participate in environmental planning.
3. Stop residential development outside the cities and preserve our farmlands and forest lands.

Thank you for your consideration.

Sincerely,

Joyce Siniscal
429 Cayuse Place
La Conner WA 98257

Tara Satushek Comment # 76

From: Ann Skinner <askinner083@gmail.com>
Sent: Friday, November 22, 2024 1:25 PM
To: PDS comments
Subject: Possible Spam: Skagit County 2025 Comp Plan Draft Policies

November 22, 2024

Planning and Development Services
1800 Continental Place
Mount Vernon WA 98273

Re: Comments on the Skagit County Comprehensive Plan Update – Climate and Environment Elements

Dear Skagit County Commissioners, Planning Commissioners and Staff

I am a resident of Skagit County and a business owner in Mount Vernon, so I feel compelled to comment on the Comprehensive Plan updates as they will guide the success and future quality of life for my family, my business and my employees.

A major concern I have as both a citizen and as a business owner is the impact of climate change, and in particular, sea level rise on many of the low-lying areas throughout the Skagit Valley. I have observed several times just this year the impact that higher "king tides" have on local roads, highways and tidally influenced sloughs and bays. I therefore am in support of **Policy revision CE 10.3** and would encourage an assessment of areas in the County that will be impacted by sea level rise. I also support **Policy revision 6.0 and 6.6** as they encourage protecting ecosystems that sequester carbon and reducing GHG emissions that are driving climate change.

Quality of life for my family and employees is in large part the reason that we settled in Skagit County and have chosen to start a business here. The rural nature of the area, along with the abundance of wildlife and natural areas are an important part of that decision. I therefore **support Policy revision 3A(a)**. However, **I do not support Policy revision 3A(b)** as it supports increased housing densities in RURAL areas which could encourage sprawl and destroy the rural character of the County.

Finally, I am in support of **Energy Conservation Policy revisions, particularly 9A 5.1, 5.2, 5.3 and 5.4** where incentive programs and financing support can be used to help encourage installing or adopting upgrades to reduce energy use and consequently, emit less greenhouse gasses. As a business owner, I want to do my part to help protect the environment and community I live and work in, but costs can be a limiting factor. Programs that ease that burden and give business owners the opportunity to be part of the solution are an important component of these policies.

Thank you for this opportunity to comment.

Ann Skinner
6790 San Juan Hill Lane
Anacortes, WA 98221

Tara Satushek Comment # 77

From: Nancy and Dick <nrobblee@frontier.com>
Sent: Friday, November 22, 2024 2:39 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Spam

These are my comments:

The county commissioners should select for service on their Environmental Advisory Board people with expertise and interest in environmental conservation and who have demonstrated a willingess to collaborate with others to seek realistic local solutions to environmental concerns and the climate crisis. Skagit County's natural world is so large and diverse, an environmental advisory board must be made up of a group of people with a broad variety of experience and knowledge, including, but not limited to, conservation of lands and waterways, restoration of wildlife habitat (including salmon habitat), hydrology, environmental education, climate science, biology, botany, geology, and carbon sequestration.

I recognize that the county commissioners can establish an environmental advisory board at any time, but a policy recommending the commissioners do so should be included in the 2025 Comprehensive Plan update.

Public Transit and Non-motorized Transportation

Over the past forty some years I have lived in Skagit County, I have bicycled many of the county's roads. I have also bicycled widely in other Wa state counties, other states, and other countries. My cycling experiences, both good and bad, have given me an appreciation and understanding of how public transportation and non-motorized transportation networks can work together to encourage people, regardless of where they live, their economic level, their physical abilities, and their health, to get out of their cars and walk, ride or roll, thus reducing their personal contributions to GHG emissions and reducing air pollution while improving their own health and the health of their communities.

Because of those experiences, I fully support the following PDS's proposed policy revisions:

- *8A-1.3 Multi-Modal Transportation, "Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."*

- *8A-3.1, "Transit Support- Support Skagit Transit to create incentives to encourage citizens and businesses to participate in transit use over single-occupant vehicles to reduce greenhouse*

gas emissions and vehicle miles traveled. Enhance the quality of transit systems viability by increasing speed, frequency, coverage, and reliability."

- *8A-6, Non-Motorized Transportation Network, "Provide an equitable, resilient, safe, and efficient network of trails and bikeways, including both on- and off- road facilities that link populated and historically underserved areas of the County with important travel destinations such as jobs, schools, and essential services……"*

However, the County must look carefully at safety and connectivity as it considers how to best implement its proposed policy revisions concerning public transportation and the non-motorized transportation network.

People often say they don't use non-motorized transportation (walking, cycling or rolling) for everyday trips or recreation because they don't feel safe doing so. Skagit County's paucity of non-motorized routes (whether bike lanes on roads, sidewalks, trails or paths) contributes to their feelings that it's neither safe nor convenient to use either non-motorized transportation or public transit, or a combination of both.

Connectivity: The County must create safe and efficient walking and rolling networks so people can readily reach their destinations and other forms of transportation, whether they are traveling to jobs, to take their children to school, to buy food, to obtain health care or to meet friends. Non-motorized routes must connect our county's towns, cities, and the green spaces around them, and connect the county's rural areas to towns. Importantly, safe non-motorized routes must connect to public transit hubs—buses, trains, ferries—so locals and tourists can journey farther without needing a car to do so. Clearly defined networks will allow people who don't own cars to safely walk or ride to wherever they need to go (how often my heart has gone out to people out of necessity walking or riding along our roads in the dark) and allow those who do own cars to leave them at home and choose, instead, to use non-motorized transportation options and public transit.

One public transportation need overlooked by the County is access to the county's many trailheads. The County should encourage public transit routes with bus stops at county parks, trailheads like Little Mountain, Big Rock, Northern State, with more scheduled stops on weekends.

Allowing public access on dikes for bicycling and walking by creating incentives and protections
for dike districts and adjacent landowners is one way the County could provide safe non-motorized transportation routes for locals and tourists.

For many years, the County has had plans for completing the Centennial Trail, a safe long-distance off-road route from Snohomish County to Whatcom County. The County once again is proposing to keep the Centennial Trail in its Proposed 2025-2030 Six-Year Transportation Improvement Program (TIP), stating:

"Centennial Trail (Stage 1) This project will design a non-motorized path from Coltrin Road to Clear Lake Park as part of the connection or portion of the Centennial Trail that currently runs through Snohomish County. Survey was completed in 2016 and the County was awarded $215,250 in Federal funding for design of the project. Skagit Public Utility District is currently clearing the trail and installing waterline. We will be seeking additional funding to complete design and construction through various grant programs as they become available."

It's long past time for the County to bring the Centennial Trail to fruition. The County needs to prioritize getting funding **now** for the Centennial Trail.

In 2009 the County's Open Space Concept Plan proposed several multi-use trails in addition to the Centennial Trail that would connect the county's towns, open spaces, and rural areas. Only the Cascade Trail was completed. Suggested long distance trails included:

- Anacortes-Burlington Trail that could extend west from Burlington along SR-20 through the Bayview Ridge UGA to link with the Swinomish Channel and the PNW Trail to LaConner and Anacortes, thereby creating a countywide trail linkage with other major trail systems.
- Swinomish Channel Trail that could extend north from LaConner along the Swinomish Channel to the PNW Trail, providing access to the estuaries and wetlands in Padilla and Fidalgo Bays.
- PNW/Interurban Trail that could extend south from the Interurban Trail in Whatcom County through Bayview to the Swinomish Channel then west through Anacortes to Deception Pass and Whidbey Island
- Skagit-Snohomish Trail that could extend from the Nookachamps south through Mount Vernon and Britt Slough then along the South Fork of the Skagit River to link with Fir Island, Conway, Stanwood and the Snohomish County trail systems.

The County should update the Open Space Concept Plan taking into account the impacts of climate change, and plan for more trails for use by locals and to attract recreationists and eco-tourists like birders, creating a win-win for the County by increasing the tourism economy without increasing the carbon footprint.

Safety: If the County truly wants to decrease its carbon emissions by creating a non-motorized network that will be used by locals and visitors alike, it must plan carefully to make non-motorized routes safe for all users.

The County should begin by mapping and identifying roads, including round-abouts, that are currently too dangerous for walking, cycling, or rolling, and then develop plans to make them safer for non-motorized use. Similar safety measures should be incorporated into other proposed routes, like the Centennial Trail.

WSDOT's "Active Transportation, 2020 and Beyond", details multiple measures that allow walkers and riders to be safe. Two of those measures currently in use at two locations in Skagit County are highlighted, but Skagit County still has a long way to go before its roads and routes are safe enough to allow walkers, riders and rollers to use them without fear of harm.

Studies show that the most effective safety measure Skagit County can employ to protect walkers, riders and rollers is to reduce motorized vehicular speed limits along its non-motorized transportation routes. Per WSDOT, between 2010–2019, 86 percent of pedestrian and bicyclist fatalities in Washington occurred on roads with posted speeds of 30 mph or higher—only 14 percent on roads posted at 25 mph or less.

Unfortunately, it is not possible to reduce speed limits along all non-motorized transportation routes, particularly those along our county's highways. However, it is possible to provide ways for walkers and riders to cross high-speed roadways safely and to make travel along them safer. In addition to reduced speed limits, safety measures the County should plan to incorporate into its non-motorized transportation network include, but are not limited to the following:

- Wide shoulders that clearly separate bicycle lanes from motorized traffic. Bicycle lanes on shoulders are safest when well defined by protective barriers, either continuous or broken, rather than simply painting white lines and bicycle icons on the shoulder pavement.

- Bike paths or trails paralleling heavily trafficked routeswherever possible are more protective than bike lanes or wide shoulders.

- Bridges on non-motorized routes must have sidewalks wide enough to accommodate walkers and riders, or barrier protected bike lanes. Almost all Skagit County bridges are too dangerous for walkers and riders. The bridge on Fir Island over the North Fork of the Skagit is one of the most dangerous with no shoulders, let alone sidewalks or bike lanes, and used by semis carrying freight and as a detour route for I-5 due to emergency closures. Not quite as dangerous but particularly unfriendly to walkers, riders, or rollers, is the bridge crossing the Skagit to the west side of Mount Vernon. It has narrow shoulders and a sidewalk on only one side, not wide enough for walkers and riders to use simultaneously.

- Operational tools like bicycle, wheelchair or pedestrian accessible signals for crossing streets, highways and bridges. Such a signal is a safety measure the County should consider, for example, while it awaits funding for replacement of the North Fork Bridge over

the Skagit, a cost currently estimated at over $40 million. A signal installed now, informing drivers that a bicycle is crossing the bridge and they must reduce their speed, would be both economically feasible and protective.

- A leading walker/rider/roller interval, which allows pedestrians, cyclists and wheelchairs to get a head start at some crossings

- Bike boxes that provide a high-visibility staging area for bicyclists waiting at red lights.

- Turning opportunities for cyclists: From WSDOT: a signal can have one phase with the WALK signal on and no left turn permitted for drivers, and a separate phase with DON'T WALK and driver left turns permitted; this provides separation in time. As another example, restrictions on drivers making right turns on red after stopping can help to reduce conflicts between turning drivers and pedestrians or bicyclists.

Thank you.

Nancy Durand Robblee
21072 Mann Road
Mount Vernon, WA 98273

Tara Satushek Comment # 78

From: Molly Doran <mollyd@skagitlandtrust.org>
Sent: Friday, November 22, 2024 2:50 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies, comments submitted by Skagit Land Trust

Skagit Land Trust's

COMMENTS ON POLICY REVISIONS

Skagit County's 2025 Comprehensive Plan Environment and Climate Elements.

Suggestions submitted on behalf of

Skagit Land Trust. November 21 2024

Molly Doran, Executive Director

1020 S 3rd Street

Mount Vernon, WA 98273

Thank you for the opportunity to comment on preliminary policy revisions to the Skagit County Comprehensive Plan Environment and Climate Elements.

Skagit Land Trust conserves wildlife habitat, agricultural and forest lands, scenic open space, wetlands, and shorelines for the benefit of our community and as a legacy for future generations. Our organization has over 1,700 family and business supporters (members) and 400 active volunteers who work to protect the most important and beloved places in Skagit County. Today, the Trust protects more than 10,000 acres, including more than 48 miles of shoreline.

Our comments draw from this mission and seek to ensure that the Skagit County Comprehensive Plan works to maintain the resilience of Skagit County's natural environment in the face of population growth and the impacts of climate change.

General Comments & Suggestions

We are impressed with the staff and consultants' development of the draft Climate Element. This is a substantial body of work that suggests, if adopted, that Skagit County is prepared to address the significant challenges we will face, and are already facing, due to climate change. It demonstrates that the County will also seek to play a role in reducing its contribution to greenhouse gas emissions. We urge adoption of a robust set of climate oriented policies. Adopting sound policy for the newly required element of the Comprehensive Plan will help the County prepare. Failing to plan for climate issues risks worsening the problem, making future "fixes" more costly or out of reach.

Establish an Environmental Advisory Board

Implementation of these new policies would be assisted greatly by the County's creation of an Environmental Advisory Board (EAB).

Skagit County's natural environment is multi-layered with a variety of diverse ecosystems, open space, and critical areas. County policy states that decisions about these complex areas will be based on "Best Available Science," yet Skagit County does not have an Environmental Advisory Board to assist county decision makers in addressing environmental issues. These issues are made increasingly complex as the impacts of climate change intensify and affect many areas of the County's plans and oversight. An Environmental Advisory Board would serve a similar purpose to the existing Agricultural Advisory Board and Forest Advisory Board.

The County's Environmental Advisory Board would be composed of people who have lived experience and those with professional expertise on a variety of environmental issues, including land conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues such as bike and walking paths, water conservation, and connected wildlife corridors. Tribes should be included if they felt this was appropriate.

This Environmental Advisory Board (EAB) would help the County Commissioners and the Planning Department look at environmental issues holistically which assists in making decisions based on the best available science. In addition to researchers, scientists, and educators, the EAB could include younger people and underserved populations so the Commissioners could hear from those who do not usually have the opportunity to contribute to environmental policy planning. Individuals selected to serve on the EAB should demonstrate a commitment to environmental conservation, and a willingness to collaborate with others to seek realistic local solutions to the environmental concerns and the climate crisis. An Environmental Advisory Board would report to, and make recommendations to, the Skagit County Commissioners on natural resource and environmental plans, policies, and programs. Examples include legislation affecting natural lands, open space, wildlife habitat; land use decisions affecting the long-term sustainability of natural processes such as rivers and marine shorelines; natural solutions to improve climate preparedness and adaptation; environmental justice and environmental stewardship.

An Environmental Advisory Board could help ensure that Best Available Science is consistently considered in local planning. This board could also provide communication between the County and the environmental community as well as the community at large.

Specific Comments

Climate Element Preliminary Policies

AGRICULTURE & FOOD SYSTEMS

In suite CE 1, we support policies which seek to enhance flooding, sea level rise, innovation and drought resilience within the agricultural sector as well as support communities and their housing and safety.

> Climate change impacts are a threat to Skagit's agricultural land. Sea level rise's impact in addition to more frequent high precipitation events will put stress on drainage systems leading to more flooding and may change soil health. Growing season or crop suitability may shift with warmer temperatures, changes in weather and reduced water availability. It seems unlikely that all of the currently identified 88,000 acres can be protected over time. Therefore, we strongly support the policy's call for planning involving all involved stakeholders, however, this need is not be limited to agriculture. With a changing climate, it is important to consider the entire watershed's agricultural potential and limitations as well as the needs and challenges of agriculture alongside forestry, fisheries, habitat, water, and the built environment. Looking at the this larger interconnected system prepares us for long-term ecological resilience.

CE 1.6 We recommend addressing the following:

- One key area of focus should be identifying what lands in the watershed have a good likelihood of remaining viable farmland through time with or without public investments. Those lands that are not likely to remain viable farmland, even with reasonable long-term public investments, may be better served through dike setbacks or managed retreat, coupled with restoration projects to address Chinook recovery, blue carbon, flood storage and other ecosystem restoration goals.

- **We recommend that planning associated with climate impacts looks at the watershed as a whole** instead of only at areas of the delta below the Wild and Scenic portion of the Skagit River (as proposed) and involve the widest slate of affected parties. Agricultural lands, including those with identified unique or USDA prime farmland, extend well into the Wild and Scenic portion of the Skagit watershed. As well, agriculture, forestry, fisheries, habitat, water, and the built environment all interact in, and will face interdependent challenges, as the climate changes. Watersheds are interconnected systems.

ZONING & DEVELOPMENT

We strongly support policies in CE 10:

CE 10.1, "Work with regulatory agencies to develop regulations for elevating or setting back new and substantially improved structures located within mapped areas sea-level rise hazard areas [sic] to reduce the risk of damage caused by sea level rise."

We note that a 2022 EPA-funded study by Coastal Geologic Services and Washington Sea Grant indicates that Skagit County is, by far, the location most vulnerable to climate-driven impacts, such as sea level rise and coastal erosion, in all of Puget Sound. (https://wacoastalnetwork.com/wp-content/uploads/2022/12/Prioritizing-Sea-Level-Rise-Exposure-and-Habitat-Sensitivity-Across-Puget-Sound.pdf)

We also recommend the following:

- Other techniques besides "elevating" and "setting back" structures will need to be used, such as property buy-outs. Working with organizations that can assist with voluntary buyouts as part of their conservation strategy should be identified in the proposed policies. These voluntary buyouts can happen well before the situation becomes critical which assists property owners and local adaptation needs.

We support proposed policy revision CE 10.3, "Consider climate change, including sea level rise, extreme precipitation, increased winter stream flow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling."

One need only consider the devastating floods and resulting damage in North Carolina, as just one recent example, to realize the importance of updating flood hazard zones accordingly.

We also recommend the following:

- Skagit County should actively plan for sea level rise and climate change by updating the Shoreline Master Program under new regulations now in development, within 3-5 years.
- Skagit County should conduct a sea level rise vulnerability assessment and make it public.

We support proposed policy revision CE 10.4, "Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise."

We also recommend the following:

- Do not classify boulders as soft armoring.
- Require that new development be situated to avoid needing shoreline stabilization for the life of the structure.

We strongly support proposed policy CE 10.5, "Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle."

We also recommend the following:

- The location of hazardous industries and essential public services should be located well above the 100-year flood level.

We support but encourage fleshing out proposed policy CE 10.7, "Protect and restore coastal ecosystems to increase the resilience of species, habitats, and communities to climate change."

We also recommend the following:

- This policy should be fleshed out with more detail, such as the need to address protection and resilience through planning for shoreline migration and natural processes.
- Identify managed retreat as a tool to create new habitats and manage risk for flooding.
- Assess the sea level rise vulnerability of wetlands, aquatic vegetation, beaches and dunes, and other valuable natural assets and collaborate with landowners and partners to support adaptation.
- Identify, protect, and restore submerged aquatic vegetation (eelgrass, kelp, etc.) that provides aquatic habitat, "blue" carbon storage, and other ecosystem services
- We recommend that language be added that supports working with partners and funding sources to protect these lands as part of resilient community projects

We support, but encourage strengthening, of policy CE 10.8, "Ensure all residential and commercial development and accessory uses, port and water-related industrial facilities, equipment, and works should be located, designed, and maintained to avoid, or if necessary, withstand 100-year flood frequency flooding and/or storm tides or surges without becoming hazards and without the placement of flood hazard reduction measures or other hard structural shoreline stabilization...."

We also recommend the following:

- This policy addresses residential/commercial development in the 100-year floodplain including areas subject to sea level rise and storm surge. It does say such development should be located or designed to avoid impact from flooding/storm surge, but the implication is for new development or perhaps raising structures. There is no mention of options such as managed retreat or dike setbacks so that structures are relocated or not built in the 100-year floodplain

BUILDING & ENERGY

We support draft revisions emphasizing increased use of clean energy sources and a reduction of burning fossil fuels for energy.

We support Proposed policy CE 2.4, "Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."

We also recommend the following:

- In addition to protecting natural resource land, this policy should also emphasize the protection of floodplains and valuable habitats and ecosystems from new energy facilities.
- The County should consider installing community solar arrays on County buildings, similar to what the City of Anacortes has done on some of its public buildings. In that city individuals can invest in solar arrays on public buildings and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.
- The County should plan now for all types of clean energy installations, mapping and developing policy and code concerning the siting of electrical energy generation and storage facilities. The County should indicate where such facilities can be sited with the least conflict, and where they do not belong.

LAND USE & ECOSYSTEMS

We support CE Goal 6, "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."

We support proposed policy CE 6.1, "Ensure the protection and restoration of streams, riparian zones, estuaries, wetlands, and floodplains to maintain healthy, climate-resilient watersheds."

We support proposed policy CE 6.6, "Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."

- Thank you for including the language on avoiding conversion of carbon-rich ecosystems.

We support proposed policy CE 6.7, "Align with Conservation Futures and Open Space Program strategies of the Climate Commitment Act to maximize conservation and carbon sequestration efforts."

- The County should explore options to include forest lands, especially Secondary Forest, in the Conservation Futures program or look for other opportunities such as Transfer of Development Rights to facilitate conservation of forest lands as it already does with agriculture lands through Farmland Legacy.

TRANSPORTATION, CLIMATE RESILIENCE

We support proposed policy CE 7.1, "Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions."

We support proposed policy CE 7.2, "Map and prioritize transportation infrastructure that is vulnerable to repeated floods, landslides, and other natural hazards, and designate alternative travel routes for critical transportation corridors when roads must be closed. Strengthen the resilience of public transportation systems against heatwaves and extreme precipitation by implementing proactive measures that prevent delays, reduce disruptions, and minimize the risk of community isolation."

We support proposed policy CE 7.4, "Support community mobility hubs in strategically accessible, multimodal available locations with a focus on overburdened communities experiencing a scarcity of transportation alternatives."

EXPAND FOREST RESOURCE LANDS WILDFIRE STRATEGY

We support proposed policy CE10.6, "Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards."

Specific Comments: Comprehensive Plan: All Elements (Climate Integration)

Make changes to policy revisions for Rural Lands Conservation and Reduction of Carbon Emissions

We support proposed policy revision 3A(a), Protection of Rural Character, "Protect the rural landscape, character, and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience," and appreciate the addition of the term resilience to this policy.

We also recommend the following:

- Recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their important role in carbon sequestration. In addition, forest lands without development are easier to manage during wildfires; grasslands, wetlands, and marginal agricultural land can hold flood waters thus protecting homes and businesses.
- The County needs to avoid creating additional development potential outside of cities, towns, and urban growth areas. Rural development will result in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential services.

EXPAND FOREST RESOURCE LANDS WILDFIRE STRATEGY

We support proposed policy 4B-2.11, "Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires."

We also recommend the following:

- Identify and implement strategies for reducing residential development pressure in the wildland-urban interface. The County should discourage building in some forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights or assisting conservation agencies and nonprofits to purchase development rights. This will decrease risk of people building homes where they may be

impossible to defend from wildfires. Some other vulnerable communities are no longer allowing development in fire prone forests and wildlands.

EXPAND MULTI-MODAL TRANSPORTATION, public transit, and the non-motorized transportation network:

We support proposed policy revision 8A-1.3 Multi-Modal Transportation, "Participate in the planning and implementation of multi-modal transportation systems to increase mobility of all users, especially in underserved communities, and provide affordable, accessible, and reliable alternatives to the passenger car to reduce vehicle miles traveled and greenhouse gas emissions."

We support proposed policy revision 8A-3.1, "Transit Support- Support Skagit Transit to create incentives to encourage citizens and businesses to participate in transit use over single-occupant vehicles to reduce greenhouse gas emissions and vehicle miles traveled. Enhance the quality of transit systems viability by increasing speed, frequency, coverage, and reliability."

We support proposed policy revision 8A-6, Non-Motorized Transportation Network, "Provide an equitable, resilient, safe, and efficient network of trails and bikeways, including both on- and off- road facilities that link populated and historically underserved areas of the County with important travel destinations such as jobs, schools, and essential services....."

We also recommend the following:

We note that expansion of public transportation and non-motorized transportation networks will go a long way toward helping Skagit County meet its greenhouse gas (GHG) emissions reduction requirements and its reduction in per capita miles traveled (MVT) requirements, while benefiting overburdened communities by reducing air pollution, improving both individual and community health.

The County should look carefully at safety and connectivity as it considers how to best implement a non-motorized transportation network. We recommend the County:

- Develop multi-use non-motorized trail systems that connect towns, cities, and the green spaces around them, that connect rural areas to towns and cities, and that lead to public transit. Incorporate dikes into the non-motorized trail system, allowing public access for biking and walking. Create incentives and protections for dike districts and adjacent landowners.
- Prioritize completing the Centennial Trail from Snohomish County to Whatcom County, a safe long-distance route for locals and tourists. Plan other trails to attract recreationists and eco-tourists like birders, creating a win-win for the County by increasing the tourism economy without increasing the carbon footprint. The Tiger Trail from Burlington to Edison, and a trail from an appropriate point on the I-5 corridor to Anacortes are top priorities.
- Map and identify roads, including round-abouts, and bridges that are currently too dangerous for walking, cycling, or rolling and plan to make them safer.
- Consider safety measures like wide shoulders; bicycle lanes separated from traffic by barriers (continuous or broken); bike paths or trails along heavily trafficked routes; sidewalks on bridges wide enough to accommodate walkers and riders; operational tools like bicycle, wheelchair or pedestrian accessible signals for crossing streets, highways, and bridges.

ENERGY CONSERVATION AND CLEAN ENERGY SOURCES

We support the proposed policy revisions in Utilities Element policies 9A-5.1 through 9A-5.7 related to energy conservation that emphasize increased use of clean energy sources and a reduction of burning fossil fuels for energy.

We also recommend the following:

- To achieve the goals of the above policies, Skagit Land Trust recommends the County consider adding rules and regulations that will encourage use of currently available sources of renewable energy and plan for use of newly developing sources of renewable energy.
- The County should plan now for future desirable uses of March Point as we transition away from fossil fuels to cleaner energy sources, taking into consideration product types, manufacturing processes, and transportation methods.
- The County should consider the use of thermal energy, which following the passage of House Bill 2131, electric and gas utilities may now sell, delivered via a thermal energy network (TEN). Distinct from geothermal energy, TENs use neighborhood-scale, highly-efficient, carbon-free networks of water pipes and ground-source heat pumps to distribute thermal energy for heating, cooling, and domestic hot water, drawing on various local non-emitting energy sources (like lakes, rivers, wastewater systems, or the stable temperature of the ground not far below the surface), making clean thermal energy available to all, including renters and lower-income households.

SPECIFIC COMMENTS – ENVIONMENTAL ELEMENT REVISIONS

For the most part, proposed revisions to the Environment Element appear to be minor in nature, emphasizing streamlining the policy language and removing extraneous detail.

We support Environment Element Goal 5A, especially the strengthening of the first subgoal to emphasize no net loss of wetland functions and values: "Preserve and protect wetlands to prevent their continual loss and no net loss of wetland functions and values."

We also support the corresponding language change to Policy 5A emphasizing no net loss of wetland functions and values**.**

We recommend that the final subgoal under 5A be strengthened as follows, with underlined language, to emphasize protection of wildlife corridors:

- " Protect, restore where practical, and enhance fish and wildlife populations and their associated habitats, including seeking opportunities to protect and restore corridor connections and continuous tree canopy and cover, to allow wildlife movement and migration across the landscape."
    - Measures shall be taken to protect the natural ability of wetlands to improve the quality of surface water runoff, hold and gradually release storm water, function as primary producers of plant matter, provide habitat for fish and wildlife, provide recreational opportunities, and provide historical and cultural values."

We would like to see corresponding language changes to Policy 5A-5.1

- Emphasize protection and restoration of habitat corridor connections and continuous tree canopy and cover to allow wildlife movement and migration.

- Given the beavers' role in maintaining healthy wetlands, the County also needs to consider, when possible, ways to incentivize relocation of infrastructure and structures away from areas likely to support or be flooded by beavers. Beavers create, protect and restore wetlands, helping to maintain healthy, climate-resistant watersheds. We appreciate that the County's Natural Resources Division has provided the public with education about living with beavers, and about how to manage beavers when they cause trouble.

We recommend that 5A2.2 be more specific to assist with hazard reduction.

Alluvial drainage floods will happen more frequently with the intense precipitation events expected with climate change. While Skagit County code does recognize alluvial fans as hazard areas, specific assessment or development standards for alluvial fans are absent. These should be added to the code to reduce risk and damage.

We recommend adding the following

Add specific standards such as these examples from Whatcom County code:

- Permanent residential structures and commercial developments shall be allowed in alluvial fan hazard areas only if the fan has undergone a county-approved study to assess potential hazards, determine risks, and identify mitigation measures and is deemed suitable for development
- The determination of risk and mitigation should be based on a detailed assessment by a qualified professional that identifies the risks associated with a 500-year return period debris flow, or the maximum credible event, that could impact the alluvial fan.

We strongly support additions to policies 5A-3.1 and 5A-5.1 emphasizing the importance of protecting wildlife habitat and habitat corridors. Thank you for adding these sections

We support what appear to be new policies added at the end of the Environment Element under the theme or subheading of Climate Change, listed on pages 20 – 22 of the Environment Element revisions document.

We are unclear where these policies would reside in the Environment Element as they are not given policy numbers; and we are also unclear how they compare to the new proposed policies on p. 23 which are shown in red underlined text which implies new policy language.

We appreciate the opportunity to comment. Thank you

Tara Satushek Comment # 79

From: Elma Burnham <eccburnham@gmail.com>
Sent: Friday, November 22, 2024 3:00 PM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Spam

Hello,
My name is Elma Burnham, and I live in Mount Vernon at 811 W Hazel St, Mount Vernon, WA 98273. Thank you for the opportunity to comment on the county's comprehensive plan. I would like to add the following:

- I recommend the establishment of an Environmental Advisory Board.

- I am glad to see the support of policy 8A - 1.8 because I believe we need more opportunities for mixed transportation because of greenhouse gas emissions and quality of life for those in our community.

- I support CE 7.1, and I think employer commute trip reduction programs. Particularly, the port of Skagit Burlington location could benefit from more opportunities in this realm. That campus is full of commuters from both Bellingham and Mount Vernon that could be carpooling or taking a bus if the routes were improved.

- I would like to see more attention given to a multi-use non motorized trail system. Biking is currently unsafe in most of our region, particularly across bridges and in congested commuting areas. Meanwhile, the dike runs along most of these routes and could be used as beautiful, convenient trail, that lowers emissions and increases health of our communities.

- I would like to see more bike lanes, especially on memorial highway, with efforts for these to be safe all year, meaning well-reflected for the winter months.

- I would like the dike system to be a public trail without private property interruptions and with trash pickup for dog poop.

- I would like to see the completion of the Centennial Trail for tourists and locals alike. I think the Cascade Trail could also be beautifully expanded for bikers and walkers.

- I think we should expect more bike visitors to take advantage of the library commons and would love for them to have a place to bike from to explore the tulips and rural area.

Thank you for your time,
Elma

Elma Burnham (she/her)
(860) 949 2144
#hersalso

From: E. Bruce Hitchko <ebhitchko@gmail.com>
Sent: Friday, November 22, 2024 3:18 PM
To: PDS comments
Subject: Possible Spam: Skagit County 2025 Comprehensive Plan Update - Climate Element

Skagit County 2025 Comprehensive Plan Draft Policies

E. Bruce Hitchko
1029 E. Orange Ave
Burlington, WA 98233

My name is Bruce Hitchko and I have retired in Burlington. I have lived here for 3 years; plan to continue my retirement years here Burlington.

I'm a retired educator and love the open spaces here in Burlington for walking, cycling, and playing sports. The Senior Center and Library are marvelous city investments that I use frequently.

I am certainly concerned about climate change in Skagit County. These are the following comments I find most important to the Comprehensive Plan Update.

#1: Establishing an Environmental Advisory Board would be wise. This will help the County Commissioners and Planning Department look at the environmental issues holistically and make decisions based on the best available science.

#2: Skagit County should actively plan for sea level rise and climate change by up dating the shoreline Master Program in the next three years. And, I support the proposed policy revision CE 10.3.

#3: I would like to see some changes to policy revisions for rural lands. I support proposed policy revisions 3A(a), 6.0, and 6.6.

I recommend showing more value to conserving rural lands. In addition, the forest lands without development are easier to manage during wildfires – grasslands, wetlands, and marginal agricultural land can hold flood waters thus protecting homes and businesses.

Please delete existing policy 3A(b). An increase in rural housing densities would change Skagit County's rural landscape, character, and lifestyle.

I recommend that the County prohibit more development outside of cities, towns, and urban growth areas. More development equals more increase in greenhouse gas emissions.

#4: Adding to energy conservation, generation, and storage policy is critical.
I support an increase use of clean energy sources and a reduction of burning fossil fuels for energy. I also support policy revisions CE 2.4, and CE 10.5.

I recommend the County installing community solar arrays, similar to what has been done in Anacortes.

I recommend the County plan for clean energy installations. Pay attention to locations of electrical energy generation and storage facilities – develop policy and codes for future sites.

#5: The forest resource lands wildfire strategy should be expanded. I support CE 10.6 and 4B-2.11.

I highly recommend the County not allowing building in forested areas due to increase risk of intense wildfires.

#6: Please expand the use of multi-modal transportation – reduces GHS and VMT. I support 8A-1.8 and CE 7.1. And, the following recommendations are crucial to multi-modal transportation.

- Development of multi use non-motorized trail system that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities
- Identify and map roads and bridges that are dangerous for cyclists. Make those safer.
- Allowing public access on dikes for bicycling and walking – create incentives and protections for dike districts and adjacent landowners
- Prioritize completion of the Centennial Trail from Snohomish County to Whatcom County. More trails to attract tourists; result is increase of tourism economy.

Best Regards, E. Bruce Hitchko

Tara Satushek Comment # 81

From: Annie Philbrick <chapin802@gmail.com>
Sent: Friday, November 22, 2024 3:24 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Hello,

Thank you for the opportunity to comment on this important plan update. Forwarded to me by my daughter who has lived here longer, there are some items that I feel confident in experience to comment on.

I support items 1, 2, and 6. The others, which I may support, I do not feel qualified enough to comment on.

We moved to Skagit County this summer after many years in Stonington/Mystic Connecticut. Having grown up in Seattle and Friday Harbor since the 60s I wanted to come "home." Mystic and Stonington have similar issues you address in the CPD (Comprehensive Plan Draft). My husband was Chairman of Planning and Zoning for Stonington and for the past few years worked closely on their CPD.

As a small business owner on Main Street, Mystic, situated next to the Mystic River, a tidal river affected by sea level rise and surge, I am very familiar with the effects of being flooded. During Tropical Storm Sandy our 6,000 sq ft bookstore was flooded with 6 inches of water from the tidal surge and there was nothing we could do about it. We survived and reopened with the help of the community three weeks later but not without losses and much PTSD every time it rains inches and the tide is high. We store sandbags in the carport ready to use. Despite many conversations about how to deal with the river and sea level rise there are no easy solutions.

Mystic is part of the Town of Groton, CT and recently gave grants to businesses to enhance their sustainability. I believe these funds were leftover from the CARES Act of Covid. My business used the $5k grant to purchase and hard wire a generator in case of further flooding.

I cannot stress enough that early planning for sea level rise, climate change, such as establishing an Environmental Advisory Board, is highly critical to the success of Skagit County. I support the recommendations in item #1.

As stated, the same goes for recommendations in item #2. We ourselves cannot stop sea level rise; it requires many levels of influence. However, early planning and awareness in particular, is crucial.

Item # 6 also is critical to a small town such as Mt Vernon for example. The town of Mystic, where my former business is located, has seen booming tourist growth in the last 5 years in particular. It has become a dining mecca of New England and a destination for everyone. While great for business, the infrastructure of Main Street and such cannot keep up, resulting in many issues that are driving the locals away. No parking, traffic backed up for miles when the Bascule Drawbridge over the river goes up in the summer to allow boats through to the Mystic Seaport, etc. While I understand Mt Vernon currently does not yet have these issues year around, neither did Mystic until 5 or so years ago and now the Town doesn't know how to fix them. Withs some early planning, other means of transportation such as a river ferry, bike lanes, trolleys or buses, whatever, all would help to alleviate

the growing pains while encouraging the growth of tourism. When I visited Mt Vernon last April during the Tulip Festival, downtown reminded me very much of Main Street Mystic on any day in the summer.

Therefore I support all the recommendations under Item #6 in the CPD. There is a plethora of resources in Skagit County as far as I have found, such as the dikes, flat beautiful roads for biking, amazing birding, hiking, and just beautiful surroundings. Let's use them to the fullest while respecting the past and looking towards the future.

Thank you for your time and listening,

Annie Philbrick
17978 McLean Road
Mount Vernon, WA 98273
860-912-7108

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Annie Philbrick (She/Her)
Mt Vernon, Washington
Vice President, Book Industry Charitable Foundation (Binc)
C: 860-912-7108

Tara Satushek Comment # 82

From: Ron <rwlindsay@mail.com>
Sent: Friday, November 22, 2024 3:26 PM
To: PDS comments
Subject: Possible Spam: Skagit County's 2025 Comprehensive Plan Draft Policies

Spam

My name is Ron Lindsay. I am a resident of Anacortes and a climate scientist. I spent most of my carrier studying Arctic climate and sea ice, doing field work, looking at observations from ships, moorings, buoys, submarines, aircraft, and satellites and doing modelling and predictions. I understand the climate crises we are all living. I understand that predictions of the details of how the global crises will impact local conditions are uncertain, and I understand that the biggest source of uncertainty in climate projections is what the global community will do to reduce to zero greenhouse gas emissions. It is clear that while much is being done to expand clean energy options there is no real progress in reducing global greenhouse gas emissions and they continue to rise. The county should plan on worst-case scenarios for climate change.

I have several comments on the Environment and Climate Change, Resiliency and Greenhouse Gas Emission Reduction section of the comprehensive plan.

1. **The refineries**. We must acknowledge that the refineries on March's Point are a major massive source of fossil fuel emissions from the county through their products, shipping, trucking, railroad, and plant operations. While it is clear the county has no ability to direct the operations of these facilities it is in the counties best interest to begin wide discussions on the eventual need for and implications of decommissioning these plants. **They must eventually totally close if the climate crises is to be addressed in any meaningful fashion** for the region if not for the county, the sooner the better. Discussions are needed now about how to best manage their decommissioning in a timely manner that best protects energy needs, the regional economy, the plant workers and the surrounding communities. How can these industrial complexes be repurposed for clean, sustainable businesses? The planning department needs to openly address the need to eventually decommission the refineries and, with the state, hold the owners responsible for all cleanup. The cost of fossil fuels should be allowed to increase substantially as planned for in the Climate Commitment Act and making the demand for the fuels and the need for the refineries to diminish.

2. **Biodiversity and sustaining the natural environment must be a very high priority** in all land use determinations. A healthy natural environment is essential for the health and well being of the citizens of the county and we should not allow loss of farm land, forest land, wet land, or shorelines and maintain all development within the urban cores. This will require much higher density so zoning in the county should allow this.

I recommend that the county recognize the value of conserving rural lands including agricultural lands, grasslands, forests, and wetlands because of their important role in carbon sequestration. In addition, forest lands without development are easier to manage during wildfires, and grasslands, wetlands, and

marginal agricultural land can hold flood waters thus protecting homes and businesses. Maintaining and increasing connectivity between wild lands is crucial for enhancing biodiversity.

I also recommend that the County needs to prohibit more development outside of cities, towns, and urban growth areas. Rural development will result in increased greenhouse gas emissions due to frequent travel for schools, shopping, jobs, and essential service.

3. In order to reduce driving and the fossil fuel use or energy use from individual cars, **the public transit system should be greatly expanded** and made much more user friendly. More bus stops, more bus shelters, more buses, better connections to other urban centers like Bellingham, Arlington, Oak Harbor, and Everett, better outreach to new riders at community events, more adds for bus riding.

4. I Recommend the **establishment of an Environmental Advisory Board**. The EAB will be made up of people who have lived experience and those with professional expertise on a variety of environmental issues, including conservation, habitat restoration, climate science, greenhouse gas emissions reduction, climate impacts mitigation, urban planning, open space issues like bike and walking paths, and connected wildlife corridors. This will help the County Commissioners and the Planning Department look at environmental issues holistically and make decisions based on the best available science. In addition to researchers, scientists, and educators, the EAB could include younger people and underserved people so the commissioners could hear from people who do not usually have the opportunity to contribute to environmental policy planning.

5. Skagit County should actively **plan for sea level rise and climate change** by updating the Shoreline Master Program. New and existing infrastructure should **accommodate projected sea level rises for a worst-case scenario of over 3 feet in the next hundred years** and we should also plan to accommodate possible tsunami flooding from a major earthquake. An example is the urgent need to raise the level of the road to Sammish Island, which already occasionally floods. The areas around Sammish Channel and Fir Island are also of concern.

6. **Clean Energy.** I recommend that the County consider installing community solar arrays, similar to what has been done in Anacortes and by Puget Sound Energy. Individuals can invest in solar arrays on public buildings or in elevated arrays in parking areas and then receive dividends on investment for a set time. The arrays allow multiple customers such as low-income and other individuals, businesses, nonprofits, and other groups to benefit from solar energy production.

7. **Wild Fires**. The County should no longer allow building in forested areas due to increased risk of intense wildfires. The County could achieve this by proactively purchasing development rights so people are not tempted to build homes where they may be impossible to defend from wildfires. Fire districts should be allowed to charge more for properties in forested areas. Other vulnerable communities are no longer allowing development in fire prone forests and wild lands.

8. **Multimodal Transportation**. I recommend the development of multi use non-motorized trail systems that connect towns, cities, and green spaces around them and also connect rural areas to towns and cities in order to reduce transit emissions and increase the outdoor opportunities for the residents.

I recommend the county should identify and **map roads and bridges that are dangerous** for cyclists and develop plans to make them safer by adding shoulders or bike lanes.

An example is the Cascade Trail to Concrete which has a dangerous crossing at Grandy Creek near the Baker Lake Road. A bridge for the trail should be built for this crossing.

I also recommend allowing **public access on dikes** for bicycling and walking by creating incentives and protections for dike districts and adjacent landowners.

Finally I recommend to prioritize **completion of the Centennial Trail** from Snohomish County to Whatcom County and to develop additional trails to attract recreationists and eco-tourists which would increase the tourism economy without increasing the carbon footprint.

Thank you for considering these comments.

Ron Lindsay

Tara Satushek Comment # 83

From: Sarah Roberts <saraharoberts@gmail.com>
Sent: Friday, November 22, 2024 3:29 PM
To: PDS comments; Commissioners; Planning & Development Services
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Dear Commissioners,

Regarding plans for the 2025 comprehensive plan update climate element I wish to make clear my concerns, and those of many of the residents you represent.

What we have to do going forward as a county and as individuals is uncomfortable, costly, and uncharted. I recently had the opportunity to travel to 4 different countries in Europe and was most impressed by the technologies, jobs and individual efforts and lifestyle changes that are being focused on mitigation of climate change effects. I worry we in the USA are slow to realize the work we need to do in order to stave off the mounting costs associated with climate change and protect our quality of life. I have two grandchildren, 3 1/2 and 1 years old, and I already know they will not enjoy the stability we have taken for granted over the past several decades. But we can still take action! and it is our duty to do what we can, now. I have lived in this valley since 1989 and truly believe it is unique. This is a critical time and we have an opportunity.

Please consider the following actions:

1. Establish an Environmental Advisory Board. The EAB will be made up of people who have lived experience and those with professional expertise. These are complex problems and we deserve the input of experts to help us address them. Thinking we can chart the complicated course going forward without input from experts would be arrogance. Stakeholder groups need opportunity to give input, and this includes wildlife ecologists, farmers and tribal governments. Surely we have some of the best scientists in the world, I hope we tap their knowledge.

2. Protect our natural and rural resources. This includes not allowing self contained urban areas plonked down into our farmlands. WE are blessed with rich resources that offset and reduce climate impacts, keep food local, and provide jobs. Homes should not be built in forest lands, due to increasing wildfire risks. We have seen the huge cost of this in other states where residential spread is resulting in catastrophic loss in forested areas. Let's learn these lessons. Other vulnerable communities in the western US are no longer allowing development in fire prone forests and wildlands.

3. The shoreline master program must be adopted into the GMA. Sea level rise and shoreline degradation due to increased storm intensity is real. We are seeing this in many places around the county where shorelines have been destroyed or eroded during storms. WE need to seriously include climate change predictions in our planning. We need a thorough assessment. Hard armoring has been shown by studies done at UW to be detrimental overall. This practice needs to be discontinued. Boulders are NOT soft armoring. Further construction in low bank flood prone areas needs to be terminated.

4. We need to focus on conserving rural lands and reducing carbon emissions. There is no going back here. We get one shot. Rural development increases greenhouse gas emissions. Forests and wetlands needs to be protected due to the role these areas play in carbon sequestration.

5. Focus on how we can reduce fossil fuel emissions in transportation. This includes electrification of private and public transportation and better envisioning of our towns so that pedestrian and bicycle use is facilitated. Take a walk around our towns right now and see how hard it is to get from A to B on foot.

This is not an easy job you have and so I hope you can hear and use the expertise that is available to you as you execute the responsibilities that we have entrusted to you.

Thank you for your service.

Respectfully

Sarah Roberts

1303 26th St.

Anacortes, 98221

Tara Satushek Comment # 84

From: Krueger, Morgan (DFW) <Morgan.Krueger@dfw.wa.gov>
Sent: Friday, November 22, 2024 3:31 PM
To: Robby Eckroth; PDS comments
Cc: Berejikian, Marian (DFW); Caldwell, Christie M (DFW); Whittaker, Kara A (DFW); Reaves, Marcus A (DFW); Tara Satushek; Stapleton, Timothy R (DFW); alexander.richard@dfw.wa.gov; Long, Lexine (COM)
Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies
Attachments: 11.22.24 WDFW Comments Skagit County Comp Plan.pdf; Vol.1. Science Synthesis.pdf; Vol.2. Management Recommendations.pdf

Hi Robby,

Here is the final version of our comments for the draft Environment and Climate Change, Resiliency, and Greenhouse Gas Emission Reduction Comprehensive Plan elements. Kindly include this comment letter and the attached best available science documents in the official record. Please let me know if you have any questions or comments.

All the best,

Morgan Krueger (she/her)
Regional Land Use Lead, Habitat Division
Washington Dept. of Fish and Wildlife
Region 4

Morgan.Krueger@dfw.wa.gov
425-537-1354

From: Krueger, Morgan (DFW)
Sent: Friday, November 15, 2024 2:00 PM
To: 'Robby Eckroth' <reckroth@co.skagit.wa.us>
Cc: Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>; Caldwell, Christie M (DFW) <Christie.Caldwell@dfw.wa.gov>
Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

I wanted to be sure to get you our *draft* comments as it relates to the draft Environment and Climate Change, Resiliency, and Greenhouse Gas Emission Reduction Comprehensive Plan elements. Once we receive confirmation from your team, we will finalize our draft comments and upload them to PlanView and send them to the correct comment email address (pdscomments@co.skagit.wa.us). If we do not receive confirmation, we will upload and send these comments in one week from today. If you have any comments, questions, require technical assistance, or would like to schedule a time to chat about these comments, please feel free to reach out to me.

All the best,

Morgan Krueger (she/her)
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Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

Here is the final version of our comments for the draft Capital Facilities, Utilities, and Transportation Comprehensive Plan elements. Kindly include this comment letter in the official record. Please let me know if you have any questions or comments.

All the best,

Morgan Krueger (she/her)
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Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

I wanted to be sure to get you our draft comments as it relates to the draft Capital Facilities, Utilities, and Transportation elements of Skagit County's Comprehensive Plan. Once we receive confirmation from your team, we will finalize our draft comments and upload them to PlanView and send them to the correct comment email address (pdscomments@co.skagit.wa.us). If we do not receive confirmation, we will upload and send these comments in one

week from today. If you have any comments, questions, require technical assistance, or would like to schedule a time to chat about these comments, please feel free to reach out to me.

All the best,

Morgan Krueger (she/her)
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From: Krueger, Morgan (DFW)
Sent: Thursday, September 19, 2024 3:53 PM
To: 'Robby Eckroth' <reckroth@co.skagit.wa.us>; pdscomments@co.skagit.wa.us
Cc: Caldwell, Christie M (DFW) <Christie.Caldwell@dfw.wa.gov>; Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>; Whittaker, Kara A (DFW) <Kara.Whittaker@dfw.wa.gov>; Reaves, Marcus A (DFW) <Marcus.Reaves@dfw.wa.gov>; Stapleton, Timothy R (DFW) <Timothy.Stapleton@dfw.wa.gov>; Long, Lexine (COM) <lexine.long@commerce.wa.gov>; Richard, Alexander (DFW) <Alexander.Richard@dfw.wa.gov>
Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

Here is the final version of our comments. Kindly include this comment letter in the official record. Please let me know if you have any questions or comments.

All the best,

Morgan Krueger (she/her)
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Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

I wanted to be sure to get you our draft comments as it relates to the draft Housing and Land Use elements of Skagit County's Comprehensive Plan. Once we receive confirmation from your team, we will finalize our draft comments and upload them to PlanView and send them to the correct comment email address (pdscomments@co.skagit.wa.us). If we do not receive confirmation, we will upload and send these comments in one week from today. If you have any comments, questions, require technical assistance, or would like to schedule a time to chat about these comments, please feel free to reach out to me.

All the best,

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Subject: RE: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

Here is the final version of our comments. Kindly include this comment letter in the official record. Please let me know if you have any questions or comments.

All the best,

Morgan Krueger (she/her)
Regional Land Use Lead, Habitat Division
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From: Krueger, Morgan (DFW)
Sent: Thursday, August 15, 2024 4:18 PM
To: Robby Eckroth <reckroth@co.skagit.wa.us>
Cc: Caldwell, Christie M (DFW) <Christie.Caldwell@dfw.wa.gov>; Berejikian, Marian (DFW) <Marian.Berejikian@dfw.wa.gov>
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

Hi Robby,

I wanted to be sure to get you our draft comments as it relates to the draft Rural and Natural Resource Lands elements of Skagit County's Comprehensive Plan. Once we receive confirmation from your team, we will finalize our draft comments and upload them to PlanView and send them to the correct comment email address (pdscomments@co.skagit.wa.us). If we do not receive confirmation, we will upload and send these comments in one week from today. If you have any comments, questions, require technical assistance, or would like to schedule a time to chat about these comments, please feel free to reach out to me.

All the best,

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Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

November 22, 2024

Robby Eckroth, Senior Planner
1800 Continental Pl
Mount Vernon, WA 98273

RE: Case # 2022-C-307, WDFW comments for Skagit County's draft Environment and Climate Change, Resiliency, and Greenhouse Gas Emission Reduction Comprehensive Plan elements

Dear Mr. Eckroth,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on draft elements of Skagit County's Comprehensive Plan as part of the current periodic update. Within the State of Washington's land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions. We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

Table 1. Recommended changes to proposed policy language.

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW Comment
Climate, Resiliency, and Greenhouse Gas Emission Reduction Element (this version: link)		
CE 10.3 Page 2	Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling.	We greatly appreciate this element's emphasis on updating flood hazard zones based on best available science, as FEMA Flood Insurance Rate Maps (FIRM) do not consider climate projections or modeling.

CE 6.2 Page 9	Once modeling is available, incorporate hydrologic climate impact projections into the design of water-crossing structures such as culverts and bridges to support fish passage and habitat quality.	Current fish passage barriers within Skagit County can be found through WDFW's interactive mapping tool. See also NOAA's grant opportunity that addresses this, Restoring Fish Passage through Barrier Removal Grants. Please see WDFW's climate-change-resilient culvert webpage and Incorporating Climate Change into the Design of Water Crossing Structures: Final Project Report (2017) for resources on how to incorporate climate-resiliency into culvert designs.
Environment Element (this version: link)		
5A-2 Page 4	Utilize existing programs, grants, and other funding opportunities to provide educational outreach and the involvement of a well-informed citizenry in developing programs, voluntary stewardship, and regulations for the conservation and protection of critical areas.	See WDFW's Habitat at Home resource. This program promotes the implementation of wildlife habitat features in any outdoor space, whether public or private, large or small. Participants receive a free sign to display, recognizing their efforts and commitment to supporting local wildlife. By showcasing their involvement, participants help raise awareness among neighbors, encouraging wider community participation and fostering a network of connected habitats. See also WDFW's Landscape Planning for Washington's Wildlife, especially "Chapter 6: Implementation through Comprehensive Plans, Development Regulations, and Incentive Programs," page 6-1.
5A-3.1 Page 5	Wildlife corridors and connections between areas of native vegetation, and riparian corridors, wetlands, and open space should be conserved and protected whenever feasible through incentive programs and unique infrastructure planning.	We recommend incorporating wildlife corridor needs within all infrastructure retrofits and new development projects. For example, culverts replaced with wide underpasses can facilitate wildlife habitat corridor connection (Wildlife Habitat Connectivity Consideration in Fish Barrier Removal Projects), along with potential pedestrian trail linkages and facilitate climate resiliency against higher flow conditions (WDFW's Incorporating Climate Change into the Design of Water Crossing Structures). Planning for wildlife habitat corridor connection within transportation projects is exceedingly important to consider to help address wildlife-vehicle collision concerns.

5A-3.2 Page 5	Public and private programs should be encouraged and utilized to support and quantify the ability of wetlands, streams, and habitat conservation areas to function naturally and provide landscape diversity and ecosystem services.	Quantifying ecosystem services in monetary terms provides a tangible, measurable framework that allows stakeholders to better understand the cost-saving and environmental benefits of protecting natural features and retaining mature vegetation. When these benefits—such as improved water quality, flood mitigation, and groundwater recharge—are translated into economic terms, they become more relatable and compelling for decision-makers, enabling informed choices that consider both immediate and long-term savings. By integrating this approach into policy, the county can demonstrate how sustainable management of natural resources supports infrastructure resilience, reduces public expenditures on traditional "gray" infrastructure, and fosters community well-being, making it easier for stakeholders to prioritize and invest in sustainable development. See the USGS's Ecosystem Services Assessment and Valuation tools, as well as i-Tree. See also FEMA's guide *Building Community Resilience with Nature-based Solutions*, as well as software to track these resources from Natural Capital Project. Furthermore, see **Kitsap County's approach to quantifying ecosystem services through their Kitsap Natural Resource Asset Management Project.**
5A-4.5 Page 8	Annual evaluations and prioritized recommendations for non-point source pollution control (such as from Watershed Action Plans and Water Quality Management Plans) shall be implemented where found to be feasible and most cost-effective.	We recommend establishing incentive programs for developments to address nonpoint source pollution. Examples of similar programs in other counties are listed below: **1. King County:** • **RainWise Program:** A collaboration between King County and Seattle Public Utilities, RainWise provides rebates covering most or all of the cost for installing rain gardens and cisterns on private properties within eligible combined sewer overflow basins. • **RainScapes Program:** This initiative partners with property owners in unincorporated King County to fund and install green stormwater infrastructure features, such as rain gardens and native

		plant landscaping, to manage rainwater runoff. **2. Pierce County:** • **Pierce Conservation District Programs:** Offers mini-grants up to $4,000 for projects like rain gardens, rain tanks, urban wildlife habitats, or de-paving. Additionally, a cost-share program provides approximately $2,000 per property, with homeowners responsible for construction or hiring a contractor. **3. Kitsap County:** • **Kitsap Conservation District Cost Share Program:** Provides up to $1,000 per project and technical assistance for installing rain gardens and other LID practices. **4. Thurston County:** • **City of Olympia Rain Garden Incentive Program:** Offers up to $400 reimbursement for rain garden installations. • **Storm and Surface Water Utility Rate Credits:** Schools and non-residential properties can receive utility rate reductions by implementing approved stormwater management practices. **5. Snohomish County:** • **Snohomish Conservation District Programs:** Provides technical assistance and financial incentives for homeowners interested in installing rain gardens and other LID features to manage stormwater.
5A-5.1 Pages 9-11	(d) Fish and Wildlife Habitat Conservation Areas... ix: Riparian areas, which provide vital wildlife habitat, support diverse vegetation, improve water quality, stabilize stream banks, and mitigate flooding, will be protected, enhanced, and adaptively managed. Practices that safeguard the ecological functions of these areas will be prioritized, using best available science to	To address this section's goals, we recommend incorporating the adjacent suggestion, which outlines the uniquely important functions of riparian areas. To actively conserve riparian areas, we strongly recommend the county utilize WDFW's best available science (BAS) and management recommendations related to riparian ecosystems. Protecting all streams regardless of fish presence, employing riparian management zones (RMZs) to replace outdated 'stream buffer' terminology, and utilizing site-specific characteristics to determine

	benefit both local species and the overall health of the watershed.	RMZ widths (Site Potential Tree Height at 200 years, or $SPTH_{200}$) are all integral components of ensuring no net loss of ecosystem values or functions occur. See RMZ widths via WDFW's mapping resource. Many counties have worked with WDFW during this periodic update to incorporate this science. See also the Department of Ecology's Climate Resilient Riparian Systems Grant.
5A-5.3 Page 15	(e) Fish and Wildlife Habitat Conservation Areas (i) New development within or adjacent to HCAs should incorporate design elements that protect wildlife habitat and ecosystem service values.	As previously noted in the comments for 5A-3.2 (Page 5), protecting natural ecosystem services—such as flood mitigation, carbon sequestration, natural cooling from trees, water filtration, and recreational opportunities—is often far more cost-effective than relying on built infrastructure. Safeguarding these invaluable services is essential not only for the health and resilience of ecosystems but also for the well-being of our communities, providing sustainable benefits that built solutions may not be able to replicate.
5A-5.4 Page 16	(ii) Site inspections and development review of construction within critical areas;	We recommend clearly emphasizing the requirement to demonstrate that **avoidance** was considered first within this policy section. Requiring projects to assess the mitigation sequence, starting with avoidance, ensures compliance with environmental regulations (WAC 197-11-768) and ensures alignment with best practices for ecosystem protection. We encourage this language to be reflected within this Comprehensive Plan.
5A-5.5 Page 18	(d) The County shall place a high priority on the proper placement or other correction of all identified county road culverts causing blockage of fish passage.	We encourage the county to look for ways to combine these projects with other benefits, as noted in comments given for 5A-3.1 Page 5 above.
Climate Change Page 21	(b) Reduce building energy use through green building incentive programs and retrofit of existing buildings.	We encourage the county to participate in the effort to address environmentally sustainable development by utilizing incentives to help address climate resiliency goals. See examples and resources below: **1. King County:**

		• Green Building Grants: King County offers grants to projects that meet stringent criteria for resource conservation, encouraging the adoption of green building practices. • Sustainable Building Program: This program provides resources and incentives for developers, builders, architects, and homeowners interested in sustainable building practices. **2. Statewide Resources:** • Clean Buildings Performance Standard (CBPS)**:** Administered by the Washington State Department of Commerce (DOC), CBPS aims to reduce energy consumption and greenhouse gas emissions in existing buildings. The program sets energy performance standards and provides incentives for early compliance. Building owners who demonstrate early compliance can receive financial incentives to offset the costs of energy efficiency improvements. • Energy Efficiency Grants: The DOC offers grants to public entities, including cities, towns, school districts, and state agencies, to fund energy efficiency improvements in public buildings and facilities. • Energy Audit Incentive for Public Buildings Program: This program provides financial assistance to publicly owned buildings for conducting energy audits, which are essential for identifying energy-saving opportunities and complying with the Clean Buildings Performance Standard. A total of $20 million is available to assist with the cost of energy audits. • Inflation Reduction Act Home Energy Rebates**:** In alignment with the federal Inflation Reduction Act, Washington State offers rebates for home energy efficiency improvements and electrification measures. The rebates target low- and moderate-income households and are distributed through third-party administrators.

Climate Change Page 21	(a) Enhance urban tree canopy to support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strengthen economic prosperity.	We encourage the county to participate in achieving tree canopy goals by performing assessments of tree canopy within its jurisdictions. See the Urban Tree Canopy Assessment website and how King County utilized this tool to assess the tree canopy in select jurisdictions.

Please see the Sound Choices Checklist for additional guidance for all elements of the Comprehensive Plan.

Thank you for taking the time to consider our recommendations to better reflect the best available science for fish and wildlife habitats and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don't hesitate to contact me or our Regional Land Use Lead, Morgan Krueger (morgan.krueger@dfw.wa.gov).

Sincerely,



Timothy Stapleton
Washington Department of Fish and Wildlife
Region 4, Habitat Program Manager

CC:
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Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications



A Priority Habitats and Species Document of the Washington Department of Fish and Wildlife

Washington Department of FISH and WILDLIFE

Updated July 2020

Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications

Published May 2018, updated July 2020

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Accessibility:
This document is available in alternative formats upon request. Please contact WDFW's ADA Program Manager at 360-902-2349, TTY (711), or ADAProgram@dfw.wa.gov.

Acknowledgements

Many people were involved with the creation of this document. WDFW would like to acknowledge the Washington Department of Ecology and US Environmental Protection Agency for the funds that made this document possible. Contract planning and budgeting for this work was led by Keith Folkerts. We appreciatively acknowledge the participation of our Technical Advisory Group:

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Carol Smith, PhD	WA State Conservation Commission
Steve Wondzell, PhD	US Forest Service

The scientific rigor of this document was improved through the peer review provided by the Washington State Academy of Sciences, with coordination provided by Dr. Robert Bates. Draft versions of this document were reviewed by numerous staff in state agencies, including the Department of Ecology, Department of Natural Resources, Department of Commerce, Recreation and Conservation Office, State Conservation Commission, and Puget Sound Partnership. These reviews improved the document and we appreciate the helpful feedback. We also appreciate the reviews by federal and tribal entities including EPA, NOAA Fisheries, Northwest Indian Fisheries Commission, Columbia River Inter-Tribal Fish Commission, Upper Columbia United Tribes, and individual tribes. We express our appreciation for all local governments and individuals who provided feedback during our public comment period. Finally, thank you to Peggy Ushakoff for creating graphics that help us better portray the science.

While we acknowledge and appreciate all review comments, WDFW bears sole responsibility for the content of this document.

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Leopard Frog Lithobates pipiens/*Scott Fitkin, WDFW*

Preface

This Priority Habitats and Species (PHS) document of the Washington Department of Fish and Wildlife (WDFW) is provided in support of the agency's mission to preserve, protect, and perpetuate the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. WDFW works cooperatively with land use decision makers and landowners to facilitate solutions that accommodate local needs and needs of fish and wildlife. One of WDFW's important roles in land use decision making is that of technical advisor: we provide information about the habitat needs of fish and wildlife and the likely implications of various land use decisions for fish and wildlife.

The nine chapters of Volume 1 are a partial update of a 1997 document entitled *Management Recommendations for Washington's Priority Habitats: Riparian.* This document, called *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* is a partial update because it addresses only aquatic species. Riparian needs of terrestrial species will be updated in the future. Until that update is complete, readers can consult the 1997 document, available at **http://wdfw.wa.gov/publications/00029/**, for information about riparian ecosystems and terrestrial species.

Priority Habitats are places that warrant special consideration for protection when land use decisions are made. For more information, see *Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List,* available at **https://wdfw.wa.gov/species-habitats/at-risk/phs.**

The PHS program provides land use decision support to clients such as local governments, tribes, government agencies, non-governmental organizations, and landowners. PHS consists of a PHS List, PHS Maps available at **https://wdfw.wa.gov/species-habitats/at-risk/phs/maps**, PHS Management Recommendations, and technical assistance from our regional habitat biologists.

This PHS document compliments a family of PHS documents including *Landscape Planning for Washington's Wildlife: Managing for Biodiversity in Developing Areas* and *Land Use Planning for Salmon, Steelhead and Trout: A land use planner's guide to salmonid habitat protection and recovery,* available at **https://wdfw.wa.gov/species-habitats/at-risk/phs/recommendations**.

List of Acronyms

BAS	best available science
BFW	bankfull width
CMZ	channel migration zone
DBH	diameter at breast height
DNR	(Washington) Department of Natural Resources
EPA or (US)EPA	United States Environmental Protection Agency
FEMAT	Forest Ecosystem Management Assessment Team
HCP	habitat conservation plan
IMW	intensively monitored watersheds
LWD	large woody debris
NOAA	National Oceanographic and Atmospheric Administration
NRC	National Research Council
PHS	Priority Habitats and Species
PNW	Pacific Northwest
RCW	Revised Code of Washington
RMZ	riparian management zone
SMA	Shoreline Management Act
SPTH	site-potential tree height
$SPTH_{200}$	site-potential tree height at tree age equal to 200 years
TAG	Technical Advisory Group
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WNHP	Washington Natural Heritage Program
WSAS	Washington State Academy of Sciences



Bank of the Chehalis River/Kaysie Cox, WDFW

Chapter 1. Introduction

By: Timothy Quinn, Kirk L. Krueger, and George F. Wilhere

1.1. Document Description

Volume 1 is part one of a two-volume set. It contains reviews and syntheses of scientific literature for the purpose of informing the development of policies related to management of riparian areas and watersheds of Washington State. Volume 1 adds additional information to the science summarized in the PHS report titled *Management Recommendations for Washington's Priority Habitats: Riparian* (Knutson and Naef 1997).

Volume 1 was designed to answer the following three general questions:

- What is currently known about the key ecological functions of riparian areas?
- How do riparian areas and watersheds affect the freshwater habitats of fish and wildlife?
- How do human activities affect the capacity of riparian areas and watersheds to provide habitat for fish and wildlife in rivers and streams?

Volume 1 is intended to serve two goals. The first goal is to be a source of best available science (BAS) for understanding how riparian areas and surrounding



Chehalis River meander paths between 1938 and 2013/Ken Pierce, WDFW

watersheds affect ecological functions and aquatic habitats. The second goal is to provide a scientific foundation for management recommendations presented in Volume 2, which are consistent with Washington Department of Fish and Wildlife's (WDFW) mandate (RCW 77.04.012) to protect, preserve, and perpetuate Washington's fish and wildlife. Both goals also relate to WDFW's responsibility to support and provide technical assistance for conservation and protection measures necessary to preserve or enhance anadromous fisheries under the Growth Management Act (GMA; RCW 36.70A.172) and the Shoreline Management Act (SMA; WAC 173-26-221(5)(b)).

Volume 1 does not directly address instream flows as affected by water withdrawal for domestic and commercial uses, or instream water quality, both of which are regulated by the Washington Department of Ecology. However, because water quality is affected by land use, we discuss this issue in the context of riparian and watershed science. In addition, Volume 1 does not specifically address riverine wetlands, i.e., wetland associated with rivers and streams and commonly found in floodplains. Rather, riverine wetlands are usually considered part of riparian ecosystems, which are the focus of this document. Other specific wetland management guidance is available from Washington Department of Ecology (https://ecology.wa.gov/Water-Shorelines/Wetlands).

Volume 2 translates these science reviews and syntheses into land use guidance for local governments and other organizations to conserve watershed processes and riparian ecosystems in support of aquatic species and their habitats. The guidance presented in Volume 2 is not in and of itself "best available science." Rather, it represents the recommendations of WDFW as to how a local government could include the best available science in policies, plans, and regulations to protect riparian ecosystems and their associated aquatic habitats.

WDFW recognizes that natural resource management and land use policies must often balance competing ecological, economic, and social goals (Wilhere and Quinn 2018). In fact, one of WDFW's conservation principles is that management decisions should integrate ecological, economic, and social perspectives. This volume addresses only the ecology of riparian areas within the context of watershed conditions; it does not cover economic and social aspects. Determining an acceptable balance requires a political process involving stakeholders, local governments, tribes, and state agencies. Such a process would establish society's goals for freshwater habitats for salmon and other species of fish and wildlife, and lead to management for achieving those goals. This volume can help to inform that process.

1.1.1. Ecosystems

The ecosystem, a fundamental concept in natural resource management, can be defined as "a spatially explicit unit of the Earth that includes all of the organisms, along with all components of the abiotic environment" (Likens 1992). Throughout this document we use the term ecosystem composition to mean "the different parts (components) which something is made of" (Oxford Dictionary 2015). We define ecosystem structure as the "arrangement of and relations among the parts or elements of something complex" (Oxford Dictionary 2015). We define ecosystem function(ing) to include the first and second definitions of ecological function by Jax (2005): 1) the process, or the cause-effect-relationship underlying two or more interacting components, and 2) the sum of processes that sustain the system. Note that the definitions of functions we use here are broader and more inclusive than "functions" defined solely as ecosystem outputs that benefit humans, namely goods and services (Jax 2005; MEA 2005).

In this volume, we explicitly consider the composition, structure, and function of riparian ecosystems in the context of the surrounding watershed. This is especially important in light of the challenges of managing ecosystems sustainably and the risks associated with scientific uncertainty, i.e., the consequences of being wrong.

The composition, structure, and function of ecosystems describe the organization of biotic and abiotic elements and the processes occurring among elements. These concepts are closely related but not equally well studied nor understood. For example, describing an ecosystem's composition and structure is easier than describing its functions (Hunter et al. 1988; Noss 1992). Likewise, management objectives are often expressed in terms of composition and structure, not functions, because they are easier to characterize.

Composition and structure versus function have a chicken-and-egg relationship. That is, functions (processes) are in large part responsible for maintaining composition and structure, but some functions could not exist without an ecosystem's particular composition and structure. Myster (2001), for instance, argues that ecosystem structure can be defined as the minimal organization necessary for a function to operate. Others argue that managing for functions (Beechie and Bolton 1999) is likely to be more successful than managing for composition and structure because processes likely exert stronger influences on composition and structure than the other way around (Odum 1953), and processes are more directly affected by land use activities (Reid 1998). Furthermore, some land use laws or regulations stipulate no net loss of ecological functions, not no net loss of composition and structure (RCW 90.58, WAC 173-26-186, WAC 365-196-830), however, compliance is often determined through evaluating ecosystem composition and structure, not functions. Such conceptual ambiguity suggests that we consider the entire ecosystem, i.e., composition, structure, and functions, when studying riparian areas, and furthermore, that land managers understand how composition and structure manifest ecological functions. The following chapters synthesize our review of the relationships among composition, structure, and functions of riparian ecosystems in the Pacific Northwest.

1.1.2. Riparian Ecosystems

WDFW has adopted the following conceptual definition of riparian ecosystems:

Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence).



Riparian ecosystem/Scott Fitkin, WDFW

Riparian ecosystems are sometimes referred to by different names: riparian areas, riparian zones, or riparian habitats. To compound confusion, the "riparian zone" is sometimes identified as a distinctive area within riparian ecosystems (Sedell et al. 1989; Naiman et al. 1992; Steiner et al. 1994). Some definitions include the adjacent waters whereas others do not. Unless stated otherwise, we consider riparian area, riparian habitat, riparian corridor, and riparian ecosystem to be synonyms. Furthermore, our definition of riparian ecosystem does not include adjacent waters (i.e., rivers or streams) and recognizes the riparian zone as a distinctive area within riparian ecosystems. The riparian zone contains wet or moist soils and plants adapted to growing conditions associated with periodically saturated soils.

Recent definitions reflect common conceptual understanding and identify similar composition, structure, and functions, including distinct plant communities and soil types; disturbance regimes unique to fluvial systems; gradients in soil, vegetation, and microclimate that manifest an ecotone between terrestrial and aquatic environments; and essential interactions between terrestrial and aquatic ecosystems. Riparian areas are the loci of terrestrial and aquatic interactions, however, the exact boundaries of riparian ecosystems can be difficult to delineate because: 1) ecosystems are not uniquely identified entities (Karr 1996); 2) the environmental heterogeneity of riparian areas is expressed in a variety of plant life history strategies and successional patterns; and 3) some ecosystem functions depend on environmental setting (Naiman et al. 1998).

Following Naiman et al. (1998), our definition of riparian ecosystem includes the active floodplain, including riverine wetlands, and the terraces or adjacent uplands that directly contribute organic matter or large wood to the active channel or active floodplain (Figure 1.1 and 1.2). Terraces and adjacent uplands that contribute organic matter or large wood are located in the "zone of influence." The active channel is defined by the lower limit of continuous riparian vegetation (Naiman et al. 1998), and it may be delineated by absence of both moss on rocks and rooted vegetation (USFS 2008). The upper most elevation of the active channel is sometimes equated with the ordinary high water mark. The active floodplain is located between the active channel and adjacent terrace or hillslopes (Fetherston et al. 1995; Harris 1987). Depending on the watershed, the flood return interval of the active floodplain varies between 1 and 10 years (Wolman and Leopold 1957; Ward and Stanford 1995; Lichvar et al. 2006; Williams et al. 2009; BLM 2015).

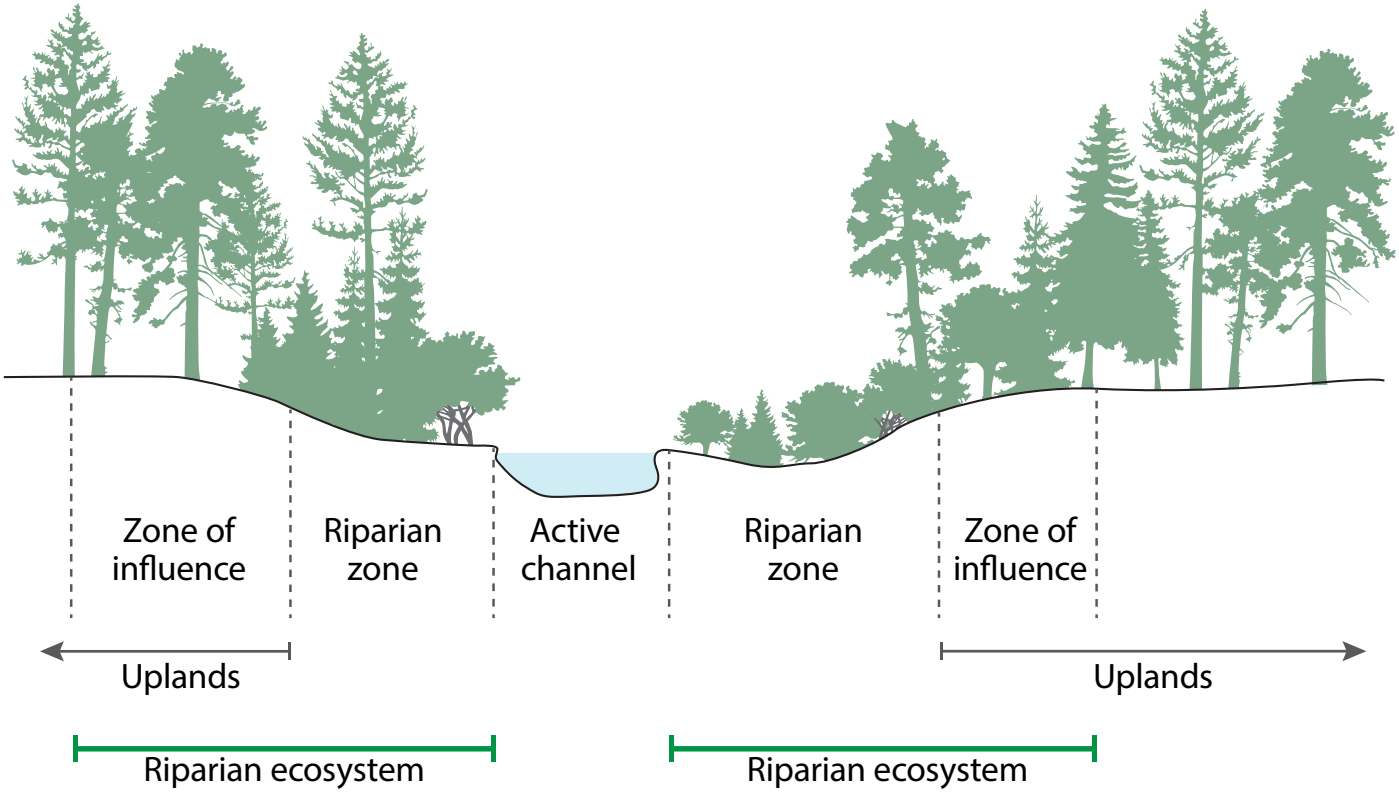
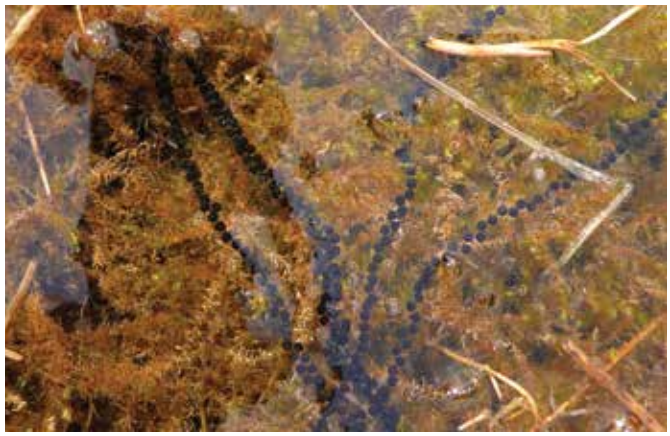


Figure 1.1. A generalized diagram of the riparian ecosystem. The NRC (2002) states that, "Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., the zone of influence)." The portion of the ecosystem characterized by moist soils and plants adapted to periodically saturated soils is the riparian zone. The width of the riparian ecosystem is typically based on riparian functions (i.e., wood recruitment to the stream in forested regions and the pollution removal function in dryland regions).

Riparian ecosystems are priority habitats in part because wildlife occurs more often and in greater variety in riparian areas than in any other habitat type. "Natural riparian corridors are the most diverse, dynamic, and complex biophysical habitats on the terrestrial portion of the earth" (Naiman et al. 1993). Although riparian ecosystems constitute a small portion of the surface landscape, approximately 85% of Washington's wildlife species are known to use riparian areas associated with rivers and streams (Knutson and Naef 1997). Of these, 170 species including 134 mollusks, 11 amphibians, 3 reptiles, 10 birds, and 9 mammals may be riparian obligates, i.e., require riparian habitat to survive (T. Quinn, unpublished). In addition, habitat for many upland and aquatic species is directly enhanced by the presence of adjacent riparian areas. A principal reason for high fish and wildlife diversity is that riparian ecosystems are exceptionally productive. Riparian



Western Toad Anaxyrus boreas *egg strings/Scott Fitkin, WDFW*

ecosystems are characterized by the availability of water, milder microclimate, and relatively fertile soils. These factors enhance the productivity of plant communities and support a complex food web that includes a rich variety and abundance of fish, invertebrates, amphibians, plants, bacteria, fungi, reptiles, birds, and mammals (Cummins 1974; Johnson and Carothers 1982). It is not surprising then, that $1.4 billion (57%) of $2.5 billion spent to recover salmon in Pacific Northwest since 2000 has been directed at enhancing, restoring, and maintaining salmon habitat (e.g., large wood supplementation, riparian planting, fine sediment remediation, land acquisition) previously provided in large part by functioning riparian areas (NOAA 2015).

In addition to their essential role as fish and wildlife habitats, riparian areas provide other significant benefits to humans (Naiman and Bilby 1998; NRC 2002). Briefly, riparian areas help provide a variety of ecosystem goods and services: provisioning services such as food and water; regulating services such as decreasing flood flows; supporting services such as nutrient cycling, sediment and pollutant filtering, and carbon sequestration; and cultural services such as recreational, spiritual, and other nonmaterial benefits (MEA 2005). These services provide real but often unquantified economic benefits to individuals and society; benefits that largely go unnoticed until they are lacking. According to the NRC (2002), protection and restoration of riparian areas should be a national goal because they have a major influence on achieving important national standards of the Clean Water Act, the Endangered Species Act, and flood damage control programs.

This document includes consideration of river-associated wetlands but does not consider other types of wetlands, which are covered by the Washington

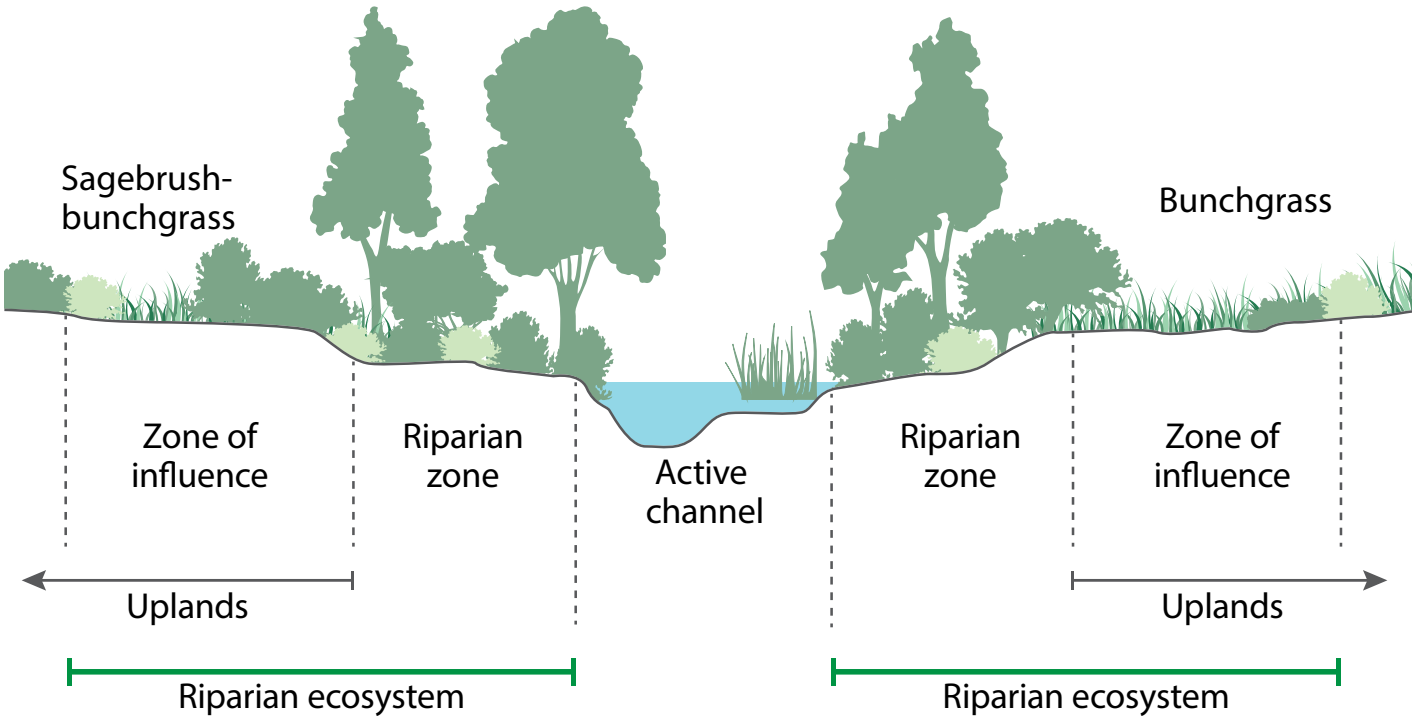


Figure 1.2. Dryland Riparian Ecosystem. The riparian ecosystem consists of two zones: riparian and zone of influence. The riparian zone extends from the edge of the active channel towards the uplands. This zone includes areas where terrestrial biota and soils are influenced, at least periodically, by surface or subsurface waters. Beyond this is the riparian "zone of influence." This includes areas where ecological processes significantly influence the stream (diagram modified from USFS 2004).

Department of Ecology, or areas bordering marine or estuarine (brackish) waters despite the potential applicability of this work to those environmental settings. A 2009 review of riparian functions of marine shorelines is available at https://wdfw.wa.gov/publications/00693.

1.2. Scope of Volume 1

1.2.1. Riparian Ecosystem Management

Riparian ecosystem management is often couched in terms of maintaining riparian functions thought to be important to fish and wildlife and their habitats (e.g., Bolton and Shellberg 2001, Everest and Reeves 2007). Some commonly identified riparian functions are described in FEMAT (1993) and the Forests and Fish Report (DNR 1999). The riparian ecosystem functions we discuss in this document, including some associated compositional and structural elements, are organized by chapter:

- Chapter 2. *Stream Morphology*—the interplay of water, sediment, and vegetation on channel form and riparian areas
- Chapter 3. *Wood*—effects of wood on channel morphology and habitat, and the recruitment of wood from riparian areas
- Chapter 4. *Stream Temperature*—effects of hydrology and shading on the thermal regime of streams
- Chapter 5. *Pollutant Removal*—the interception or filtration of fine sediments, excessive nutrients, pathogens, pesticides, and other contaminants in overland and shallow subsurface flows
- Chapter 6. *Nutrients Dynamics in Riparian Ecosystems*—dynamics and fate of the primary macro-nutrients: nitrogen, phosphorus, and carbon
- Chapter 7. *Riparian Areas of the Columbia Plateau*
- Chapter 8. *Watersheds*—relationship of watershed-scale management to the goal of achieving beneficial effects for fish and wildlife

Riparian functions are affected and in turn affect aquatic and terrestrial systems at multiple spatial scales. We focus much attention on riparian functions at the site (e.g., stream reach or land parcel) scale for three reasons. First, riparian areas are disproportionately important, relative to area, for fish and wildlife and other ecosystem services (Naiman and Bilby 1998; NRC 2002). Second, local governments and individual landowners, important users of WDFW's PHS guidance, typically manage at the parcel scale. Most land use activity, outside of public lands, occurs at the site-scale on ownership parcels that are relatively small compared to the watershed in which they occur. Third, effective and efficient conservation of fish and wildlife habitats requires management at multiple scales and thus good site-scale riparian management is an essential complement to good watershed management (Chapter 8), although approaches at different scales can vary dramatically.

1.2.2. Watershed Management

Even when all riparian functions are protected, rivers, streams, and riparian ecosystems are not immune to the effects of upland management. To varying degrees, riparian and stream structure, composition, and function reflect land uses and conditions throughout watersheds.

Regardless of its size, no ecosystem is entirely closed. Upslope activities can considerably alter the magnitude and timing of stream flows; the mobilization, routing, and storage of sediment, wood, and fine organic matter; and the quality of water, thereby influencing riparian ecosystem functions (NRC 2002; Figure 1.3). Thus, the management of riparian ecosystems at the site or reach scale should be considered just one important part, not

the sole requirement, of holistic watershed management for the protection of fish and wildlife and other values. We include Chapter 8, which focuses on watershed-scale issues that are important to the management of aquatic systems as a whole, with the intent of increasing the effectiveness of collective riparian conservation efforts. This chapter provides a conceptual framework that identifies the key watershed processes and their primary influences by, on, and through riparian areas and adjacent watercourses.

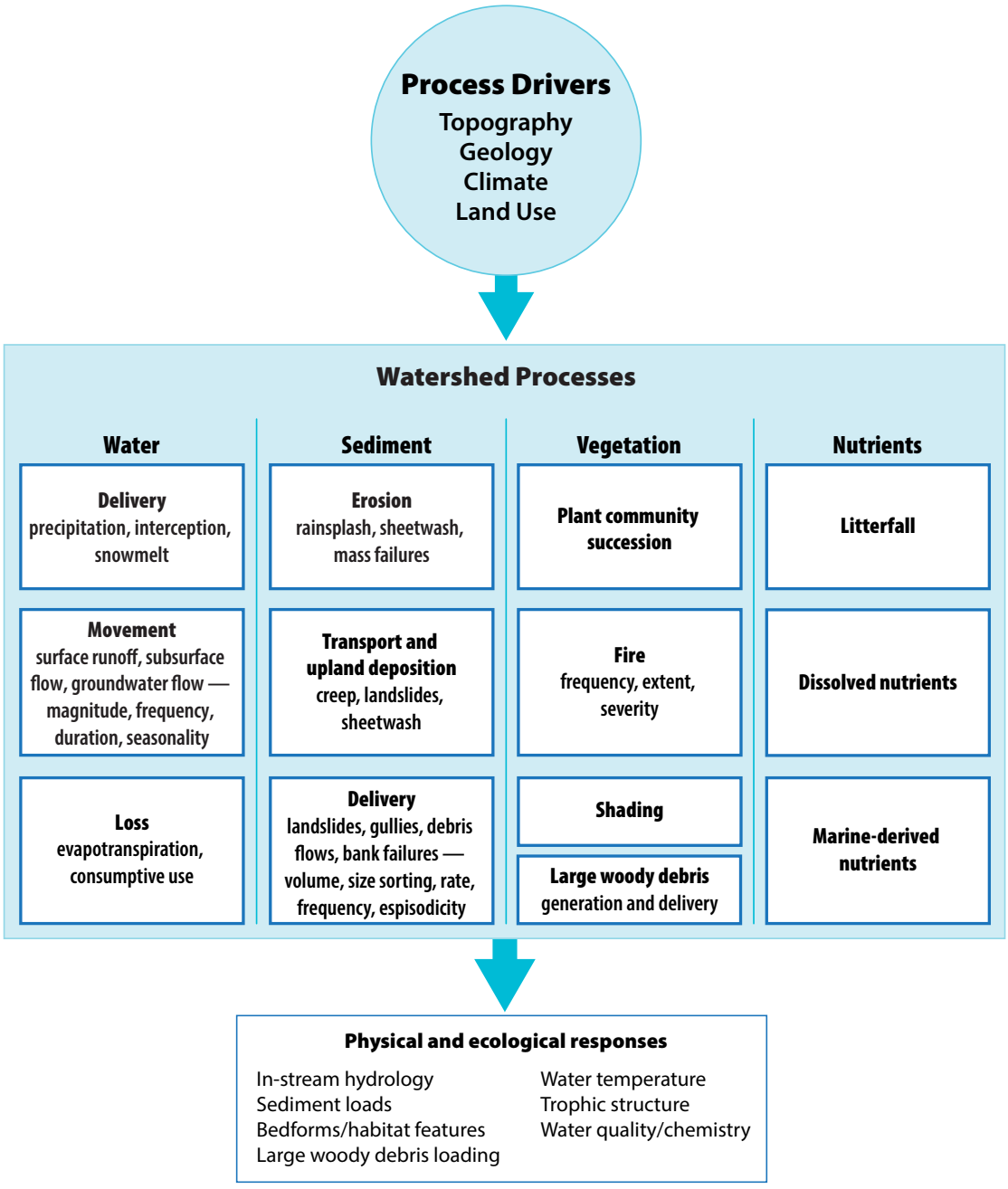


Figure 1.3. Conceptual framework for the hierarchical relationship of invariant, large-scale "process drivers," the suite of watershed processes that are determined by these drivers, and the instream physical and biological responses to those processes. Multiple additional interactions between elements and levels are not shown on this diagram to emphasize the primary influences; but in any given setting, one or more of these secondary interactions may temporarily achieve equivalent importance. This framework embraces the definition of watershed processes from Stanley et al. (2011): "[t]he dynamic physical and chemical interactions that form and maintain the landscape and ecosystems."



Devil's Club Oplopanax horridus *is common in wet soils of western Washington riparian areas/Ned Pittman, WDFW*

1.2.3. Science Synthesis

Chapter 9, *Science Synthesis to Management Implications,* of this volume summarizes important scientific finding from chapters 1-8 and provides a brief discussion of scientific themes that can inform thoughtful approaches to protecting aquatic systems.

1.2.4. Scope: Protection and Restoration

Protection and restoration of riparian ecosystems and watersheds are both essential for Washington's fish and wildlife, and especially for endangered and threatened salmonids. However, planning, management practices, regulations, and legal context for protection are different from those for restoration, and thoroughly covering both topics was beyond our scope. Thus, restoration is not explicitly incorporated in the scope of this document. Nevertheless, much of the science presented in this document can inform restoration activities. For instance, while this document does not review scientific literature on instream large wood placement, a common restoration activity, it does summarize large wood recruitment and reference conditions for the amount and size of instream large wood. Thus, the body of science that informs protection also helps to inform restoration, at least in terms of establishing resource goals and objectives.

1.3. Document Development

We employed the following approach to developing this document. We first established a Technical Advisory Group (TAG) of scientists from the region. Second, with guidance from the TAG, we conducted a literature review designed to inform the general state of knowledge regarding ecosystem protection and another literature review more focused on recent developments in riparian ecology and management. Third, we contracted with regional topic experts to author and co-author chapters. WDFW staff provided conceptual and technical guidance as possible. Finally, we subjected the draft final documents to several rounds of peer review. Each of these steps is discussed below.

1.3.1. Technical Advisory Group

The TAG helped provide overall science guidance, that is, contribute expertise and scientific perspective, provide important references and other sources of information, and review draft products. The TAG was composed of 13 individuals who were selected by virtue of their scientific expertise as opposed to affiliation with particular organization or stakeholder group. However, given the broad potential applicability of this document, it is conceivable that TAG members belong to one or more stakeholder groups. All TAG members were expected to attend three all-day meetings over the course of the project. Members of the TAG volunteered their time, except one who was paid a small stipend because she was employed by a non-profit organization. The first meeting was designed to introduce TAG members to the nature of the PHS update, to discuss different approaches to conducting a literature review and synthesizing new scientific information, and to

secure their ongoing commitment to helping WDFW meet high scientific standards. The second and third TAG meetings were designed to solicit review and feedback from TAG members on draft products. As part of their review process, we invited all TAG members to edit draft chapters and provide additional citations for WDFW's considerations. Although the TAG played a key role in advising WDFW on the science of riparian management and conservation, WDFW bears sole responsibility for the contents of this document.

1.3.2. Literature Review

We organized summaries around ecological functions including stream channel morphology, wood, pollution removal, nutrients, water temperatures, and watershed processes. Note that many of the issues we address here are directly or indirectly related to fish and wildlife habitats and other ecosystem services. We did not, however, explicitly consider cultural services that are important values for many stakeholders (e.g., spiritual, cultural and aesthetic values of riparian areas).

We enlisted the assistance of scientists with specific areas of expertise as technical advisors, authors, and informal and formal reviewers to help ensure that our summaries of pertinent scientific information were sufficiently accurate and inclusive. We were most interested in characterizing the state of knowledge and important, recent findings about each topic. That is, we tried to assesses what we know, how well we know it, and what we do not know. The summary statements in each chapter are important to the development of management recommendations because they often identify important management challenges that are not well described in the published literature (e.g., the importance of habitat connectivity to fish population persistence). To this end, when appropriate, we encouraged authors to consider the broad body of scientific information and how it might be extrapolated to unstudied locales; in other words, to consider the body of literature with regard to our ability to make reliable predictions.

Where information existed and as time allowed, we also attempted to summarize how riparian composition, structure, and functions differ among natural plant communities. In most cases, we used the broadest division called Major Vegetational Areas, which is made up of two groups in Washington State, i.e., Forested Regions and Steppe Regions (Franklin and Dyrness 1988). Regions can be further subdivided into forested zones (e.g., *Tsuga heterophylla* Zone) and steppe communities (e.g., shrub-steppe with *Artemisia tridentata*) that contain similar climax plant communities influenced by similar disturbance regimes. When information was available, for example, in the case of large wood in forested regions, we report that information at the finer division within the vegetation classification.

In addition, and as time and resources allowed, we summarized some potential effects of common land use activities on stream and riparian areas as a precursor to providing useful land use advice. We considered four general categories of land use: 1) urban, which includes commercial, industrial, urban, suburban, and rural development, 2) agricultural, which includes cultivated crops and grazing uses, 3) forestry, which includes timber management and associated activities such as

Chapter 9 summarizes scientific findings from chapters 1 through 8 and includes a brief discussion of scientific themes that can inform thoughtful approaches to protecting aquatic systems.

road building and maintenance, and 4) other activities (e.g., mining), which were not discussed due to the paucity of available research results.

We started this work by assembling topical literature reviews including Bolton and Shellberg (2001), Pizzimenti (2002), Bezener and Bishop (2005), Mayer et al. (2005), and Naiman et al. (2005). We compiled relevant literature cited in these review articles, from other reference materials we encountered, and from recommendations of TAG members. We also did an extensive literature search on computerized databases. We mostly focused our literature search on peer reviewed articles published after 1993, published in English, and conducted in proximity to Washington State. This last criterion was designed to focus on studies thought most relevant to Washington State's ecological conditions.



The North Fork Skokomish River runs through mature conifer forests of the Olympic National Park/Tim Quinn, WDFW

We also documented the type of review the study received according to RCW 34.05.271 (Appendix 1). Studies with no record of review were not considered further. As we (authors) reviewed the published literature, we noted important study findings that we believed would be especially useful for writing the PHS document. For empirical studies, our notes typically included the primary research questions or objectives, key results, management implications, and study limitations or assumptions. For literature reviews and syntheses, our notes summarized main conclusions by subject area. The intent here was to capture a sufficient level of detail for each paper so that we could use our collective notes as sources for writing the synthesis.

We found a massive quantity of literature related to riparian and watershed science despite focusing on information published after 1993. Due to the sheer volume of information, we could not cover all the literature in depth, so we covered those topics that were most relevant for management of riparian areas in Washington State. This document provides a comprehensive review on the current state of the science regarding certain riparian functions. Further, as described above, we enlisted the services of experts with specific areas of expertise as technical advisors, authors, and informal and formal reviewers to help ensure that our summaries of pertinent scientific information were sufficiently accurate and inclusive.

1.3.3. Peer Review

The peer review for Volume 1 consisted of a series of iterative steps, wherein we tried to gain as much agreement about the science synthesis as possible among those involved in the writing and reviewing process. Our intent was to provide the best available science. As described above, the TAG reviewed and often edited incomplete chapter drafts during the literature review and synthesis stage of the project. These draft syntheses were then given to topic experts to complete.

In cases, where WDFW lacked sufficient topic expertise, we provided stipends up to $10,000 to outside authors (i.e., contractors) for completing a chapter. The steps involved in completion of drafts included adding one or more conceptual models describing the system and its functioning and a synthesis or summary of the important findings over the last approximately 20 years. These steps often entailed a series of editing and reediting by WDFW staff and contractors. Once completed by contractors and returned to WDFW, the drafts were reviewed a final time by TAG members. This last review by TAG members was to ensure that completion of the chapters was consistent with their earlier guidance and with their understanding of the literature. WDFW attempted to resolve all disagreement that occurred between contractors and TAG members and provided a written description of how those issues were resolved to both the contractor and the TAG. After final WDFW review, the document was submitted for review by the Washington State Academy of Sciences (WSAS).

We enlisted the WSAS to conduct the final, independent peer review of the PHS document. Modeled after the National Academy of Science, which is charged with providing independent, objective advice to the nation on matters related to science and technology, the WSAS provides expert scientific analysis to inform public policy making at the state level (WSAS 2015). The final peer review with the WSAS was also iterative. That is, WDFW in consultation with authors and TAG members, addressed WSAS comments, made appropriate changes to the document, and then discussed those comments with the WSAS in an attempt to resolve differences. This process proceeded until we reached agreement about scientific contents and conclusions.

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Chapter 2. Stream Morphology

By: Jane B. Atha, Mike Liquori, Kirk L. Krueger, George F. Wilhere, and Timothy Quinn

2.1. Introduction

The composition, structure, and functions of lotic systems are largely due to dynamic interactions of water, sediment, wood, and riparian vegetation. The nature of these interactions is affected by topography (e.g., channel slope), flow regime, sources and characteristics of sediment, the size, strength, and density of riparian vegetation (Naiman and Bilby 1998), and the actions of some animal species, most notably the American Beaver *Castor canadensis* and salmon. The influences of water and channel slope on sediment results in channel patterns (i.e., straight, meandering, braided) (Leopold and Wolman 1957) and geomorphic zones (i.e., source, transport, depositional) (Schumm 1977) that occur somewhat predictably from headwaters to river mouth. Furthermore, variation in fluvial processes (e.g., frequency and intensity of floods) and controls (e.g., lithology, large wood, riparian vegetation) result in a wide range of channel forms or reach types that are often described based on their bedform (e.g., slope, sinuosity, distribution of sediment sizes, etc.) (Montgomery and Buffington 1997). These channel forms can be useful descriptors of aquatic species' habitats. Tributary junctions (Kiffney et al. 2006), natural disturbances (Frissell et al. 1986), and artificial structures (Stanford and Ward 2001) can create discontinuities in these general patterns.

The composition and structure of riparian vegetation affects channel morphology, which in turn affects riparian vegetation (Hupp and Osterkamp 1996; Corenblit et al. 2007; Osterkamp and Hupp 2010; Gurnell 2014). Additionally, channel morphology and the processes that shape it can be impacted by human activities (e.g., levees, dams, Beaver trapping), usually resulting in loss of habitats, reduced habitat diversity, and diminished habitat functions for aquatic species. Management actions such as bank armoring, channelization, and riparian vegetation removal tend to reduce natural variability of geomorphic processes, often amounting to stream habitat degradation greater than the sum of its parts.



Yakima River/Justin Haug, WDFW

Knowledge of the fluvial processes that affect riparian and aquatic systems is important for making sound policy and management decisions. This chapter provides an overview of water and sediment in fluvial processes, their interactions with riparian vegetation, and potential alterations of fluvial processes by human activities. We first describe a general conceptual model for considering how physical processes affect channel morphology. Next, we describe stream flow and sediment processes in more detail. We then consider the watershed-scale context that directly influences fluvial processes. Lastly, we review impacts of human activities on stream functioning, introduce the "riverscape" concept for the management of fish habitats, and describe some physical stream habitat associations of herpetofauna. Some related topics are discussed in other chapters. For example, see Chapter 3 for a description of fluvial process interactions with large wood and Chapter 8 for a thorough examination of influences and management that occur at the watershed scale.

2.2. Conceptual Context

The concept of equilibrium is one of the most important ideas in fluvial geomorphology (Thorn and Welford 1994; Grant et al. 2013). The equilibrium concept posits that rivers tend to work toward long-term equilibrium (Gilbert 1877 as cited by Grant et al. 2013). *Dynamic equilibrium* describes a state of relative stability that results from the interaction of opposing forces (e.g., flowing water and substrate resistance). That is, over the long term and assuming that process drivers like climate and land use remain unchanged (see Chapter 8), overall progression of the composition and structure of stream reaches in a watershed remains largely unchanged. A stream network may undergo significant changes during an extreme flood event, and yet return to equilibrium as smaller flows rework the sediment distributed by floodwaters to re-establish roughly the same relative abundance of stream reach types that existed prior to the flood event.

Lane (1955) conceptualized equilibrium within a stable channel as a balance among stream discharge, channel slope, sediment load, and sediment size (Figure 2.1). Lane's conceptual model was described by Heede (1980) as:

$$Q_s D \propto Q_w S$$

where Q_s is sediment load (i.e., sediment discharge), Q_W is water discharge, D is sediment size, and S is channel slope.

What remains "in balance" over time are the processes of streambed degradation (erosion) and aggradation (sediment deposition). If an increase occurs in stream discharge, for instance, then the resulting increase in stream power can cause an increase in streambed degradation. The channel "adjusts" by decreasing channel slope, which reduces stream power and causes a return to the balance between degradation and aggradation. If a shift in stream discharge or sediment supply occurs, then the channel returns to equilibrium through adjustments in one or more other variables. However, persistent changes in one or more variables of sufficient magnitude may exceed a threshold that causes an abrupt shift to a new equilibrium state (Schumm 1979).

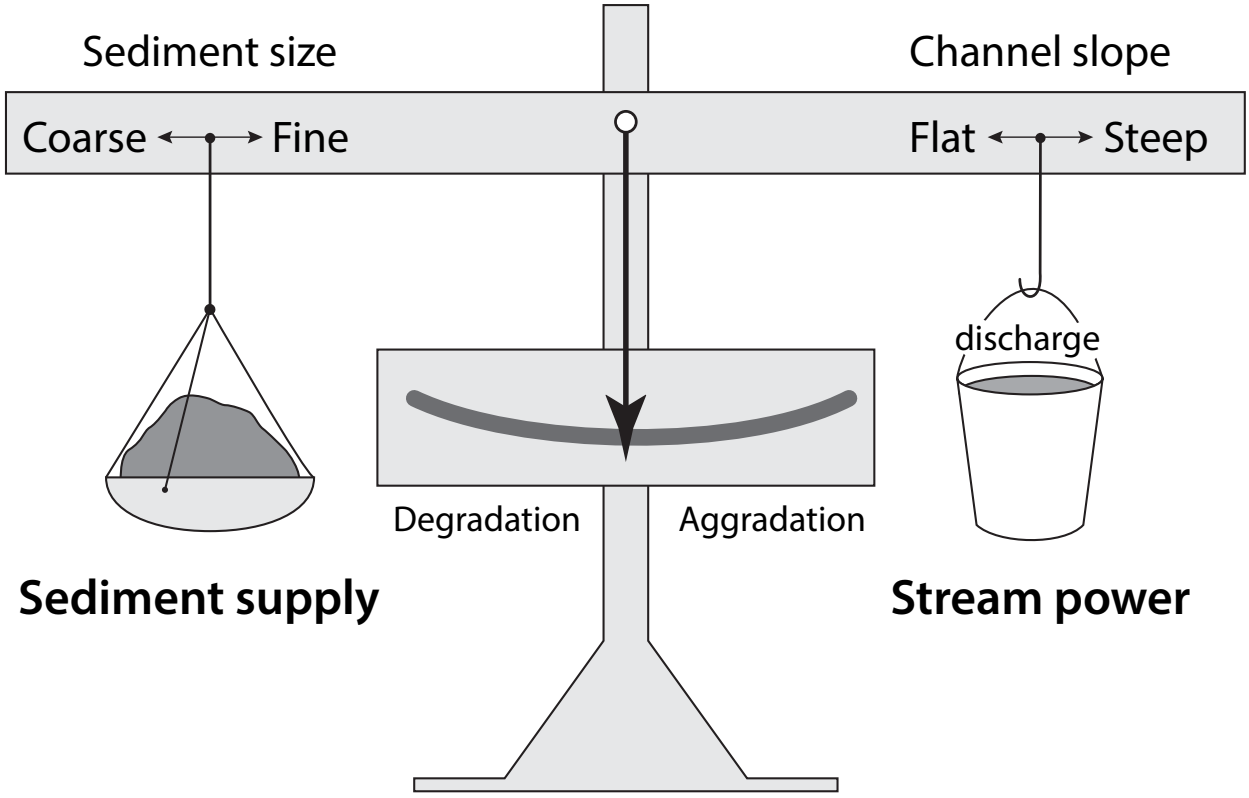


Figure 2.1. Lane's Balance illustrating the concept of channel adjustment (i.e., vertical aggradation or degradation of the streambed) in response to changes in water or sediment yield (from Dust and Wohl 2012).

While Lane's Balance is a useful conceptual model, it does not address complexity at the watershed scale nor the interactions between fluvial processes and riparian vegetation that affect channel morphology (Corenblit et al. 2007; Gurnell 2014) (Figure 2.2). These interactions are reciprocal and feedbacks exist between fluvial processes and vegetation composition and structure (Hupp and Osterkamp 1996; Osterkamp and Hupp 2010). Vegetation influences channel form and channel forming processes help shape riparian plant communities. Human activities that alter these interactions can cause significant changes to channel morphology and fish habitats.

Many geomorphic and ecosystem processes are coupled and occur in parallel at similar spatial and temporal scales. This results in mutual dependence between processes (Renschler et al. 2007). While such processes have received much attention from the scientific community in the last fifteen years, a theoretical synthesis within a holistic conceptual framework is still needed to address how riparian management interacts with this complex system (Smith et al. 2002; Stallins 2006). Interdisciplinary research of these interactions could result in better predictability of impacts caused by management. From an ecosystem management perspective, the choice of spatiotemporal boundaries—often dictated by geomorphic processes—is of profound importance to conceptualization of the system and its ecologic processes (Post et al. 2007).

We frame the hydrologic and physical processes as they shape the riverscape from the context of equilibrium and mutual dependence among water, sediment, and vegetation.

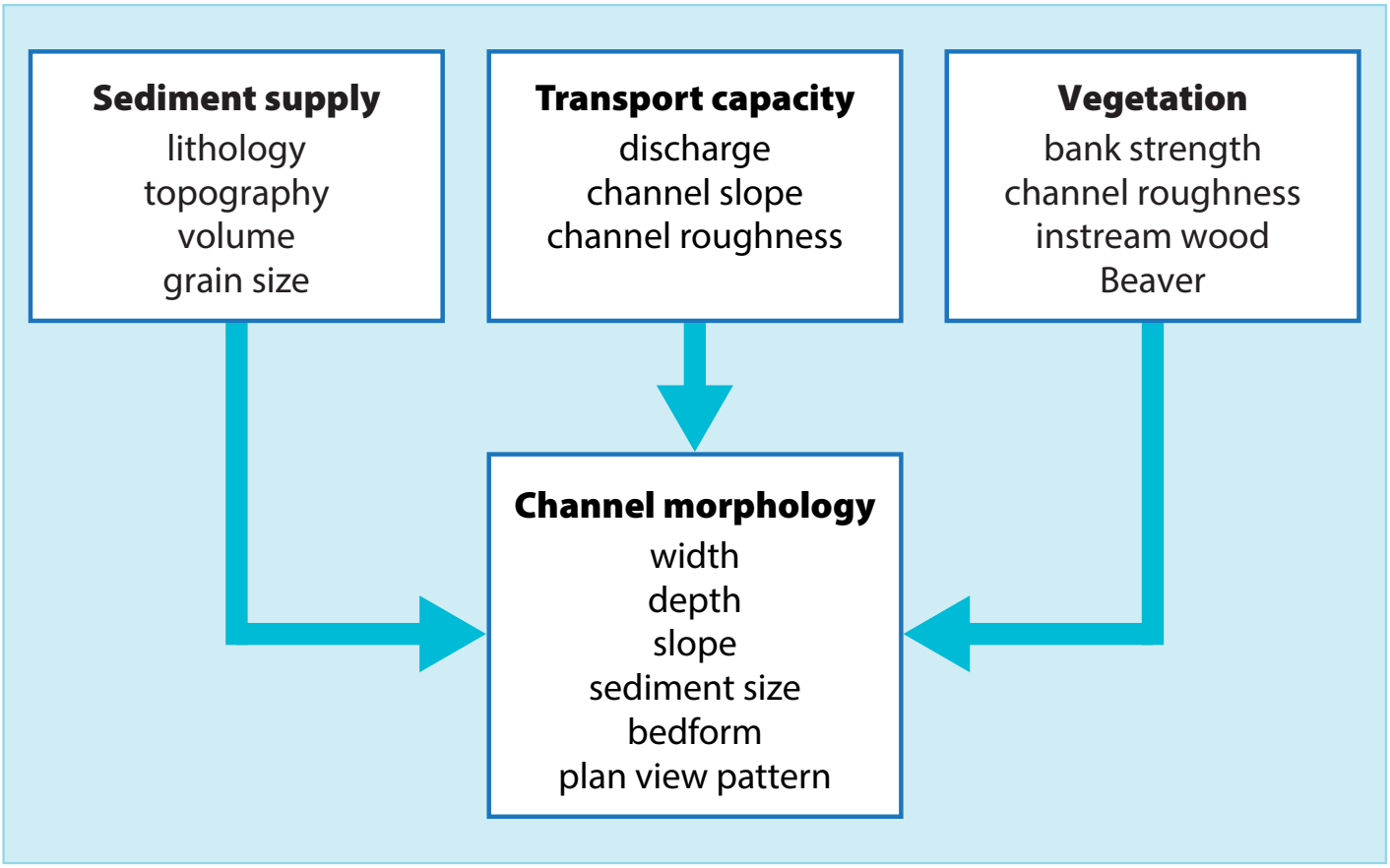


Figure 2.2. Influences on channel morphology (modified from Naiman and Bilby 1998).

2.3. Streamflow Processes

The pathways that water takes to reach a river exert a strong influence on the amount and timing of streamflow in the channel (Figure 2.3). Differences in the relative contributions of these pathways among locations and seasonal variability (e.g., presence or absence of snow) in environmental conditions produce a wide range of stream flow responses to precipitation events.

The fate of precipitation that is not lost through evaporation and transpiration is highly dependent on soil cover. Rain or melted snow that infiltrates the soil can flow downslope in the vadose zone (unsaturated), above the water table as through flow, or below the water table as groundwater in the phreatic zone (saturated).

When precipitation rates exceed soil infiltration rates (Horton 1933) or when local soils are saturated (Dunne and Black 1970a, 1970b; Dunne 1978), water moves downslope as surface runoff. Surface runoff or overland flow remains outside the confines of a channel, and is most common where vegetation is sparse. Human activities that compact soil or destroy permeable, near-surface soil layers reduce infiltration capacity and promote overland flow. A second type of runoff, saturated overland flow, occurs at convergent zones (such as hillslope concavities) and is a combination of direct precipitation onto saturated areas and return flow from the subsurface as it becomes saturated (Wohl 2014) (Figure 2.3).

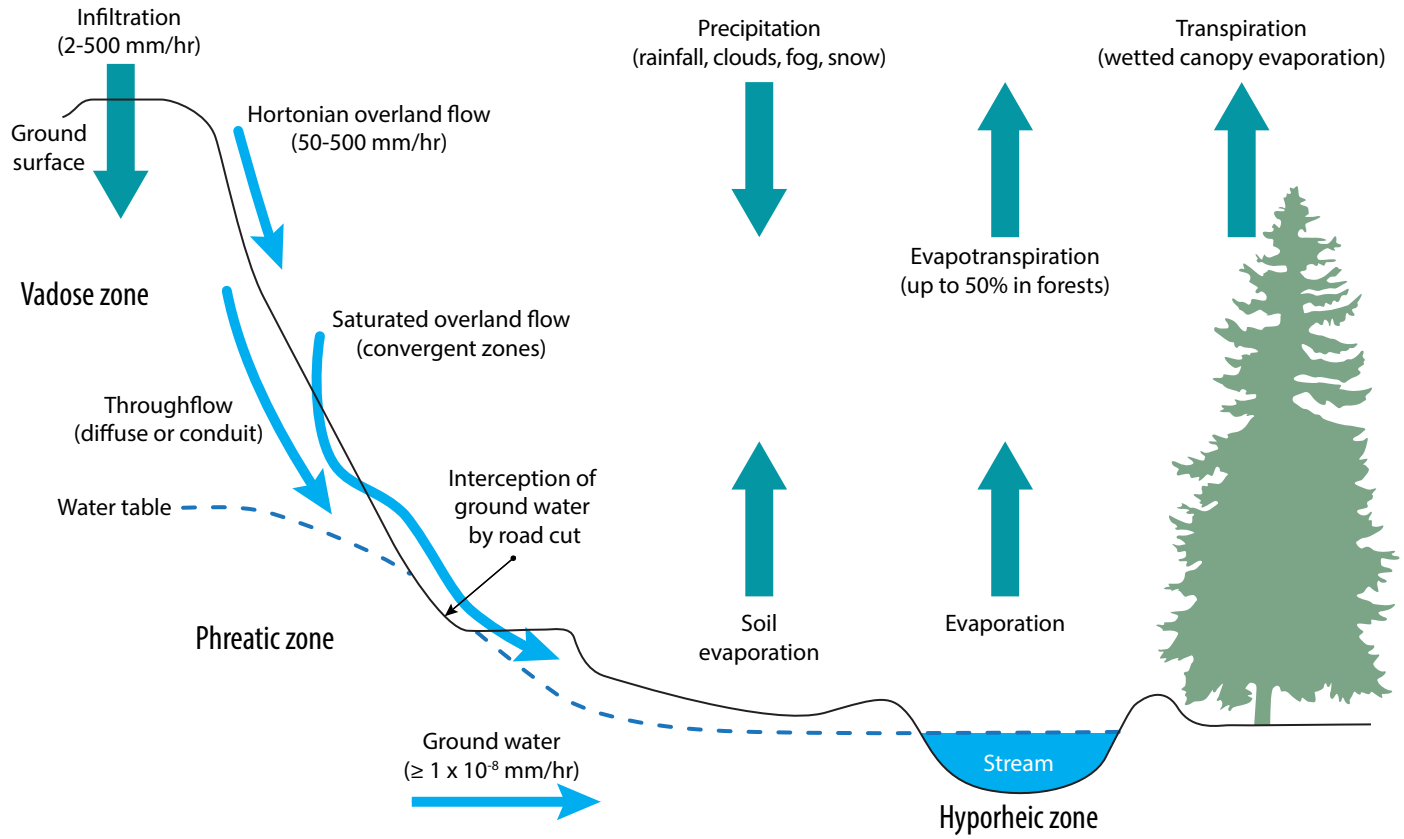


Figure 2.3. Illustration of different types and rates of downslope movement of water on a hillslope (modified from Ziemer and Lisle 1998, and Wohl 2014).

Runoff originates from variable source areas in response to precipitation and soil saturation conditions (Betson 1964; Hewlett and Nutter 1970). Conceptually, the amount of runoff within a single small drainage basin can be highly varied in space and time because many factors influence water infiltration and movement. Much of the variability in areas contributing water to the channel reflects the groundwater levels and activation[1] thresholds for lateral subsurface flow existing immediately after a precipitation event (McDonnell 2003).

Riparian vegetation influences preferential flow pathways in both surface and subsurface environments (Swanson et al. 1998; McDonnell 2003) and the manner in which surface flows create and maintain channel and floodplain morphology. During periods of active runoff, riparian areas quickly become saturated, and become the first areas within the watershed to contribute runoff into the channel (McDonnell 2003). Riparian areas account for the majority of the runoff at the beginning of a flood event, whereas hillslopes contribute more as the runoff tapers off at the end of an event. Flow resistance provided by riparian vegetation and related organic material slows water velocities, reduces peak discharge, and lengthens a flood's duration (Tabacchi et al. 2000; Nilsson and Svedmark 2002).

In a reciprocal manner, stream hydrology plays a large role in shaping riparian vegetation communities. The rate at which the river water surface lowers after a spring freshet influences seedling germination and recruitment (Mahoney and Rood 1998). Thus vegetation species composition and age structure vary due to flow frequencies that determine sediment mobilization and effective discharge (Pike and Scatena 2010).

[1] Activation of subsurface water means that subsurface water is flowing, i.e., the velocity deviates significantly from zero. Activation threshold often refers to the amount of precipitation needed to activate subsurface flow.

Interactions between stream water and groundwater occur in the hyporheic zone. In other words, the *hyporheic zone* is the ecotone between a surface stream and deeper groundwater (Boultan et al. 1998). The extent of the hyporheic zone is determined by the volume of sediment stored within the channel and active floodplain (Moore and Wondzell 2005). Two-way exchanges of water occurring in the hyporheic zone are important in regulating hydrological, biogeochemical, and thermal processes (Krause et al. 2011), which strongly influence the volume, chemistry, and temperature of streamflow. Along this ecotone, upwelling subsurface water supplies the stream ecosystem with mineral nutrients while downwelling stream water provides dissolved oxygen and organic matter to organisms inhabiting the interstitial spaces of alluvial sediments (Boultan et al. 1998). The hyporheic zone can account for a fifth of the invertebrate production in an aquatic ecosystem (Smock et al. 1992). Water flows laterally from the hyporheic zone into alluvial sediment deposits, and can extend out more than 1.2 miles (2 km) in wide valleys and to depths of 33 ft (10 m) (Stanford and Ward 1988). Hyporheic flows can also affect riparian vegetation, although the interactions between riparian communities and hyporheic conditions are not well understood (NRC 2002).



Cape Creek, Lane County, Oregon/Jane Atha, WDFW

2.4. Erosion and Sedimentation Processes

2.4.1. Sediment Sources and Delivery

Sediment sources and delivery within a watershed can vary significantly depending upon geology, climate, landform, soil erodibility, vegetation, and the magnitude and frequency of dominant disturbances. Delivery of sediment to channels by surface erosion is generally low in undisturbed watersheds, but can vary greatly by year (Swanston 1991). Annual differences are caused by variation in weather patterns, changes in exposed surface area, and changes in the amount of erodible material. Sediment can move downslope in aggregates through mass wasting (mass movement, mass failure, or slope movement) categorized as landslides, debris flows, or heaves. Mass wasting events are typically seasonal as a function of soil moisture and freeze-thaw processes (Hales and Roering 2009). Soil on a hillslope will remain stable if the sum of the applied shear stresses does not exceed the sum of the shear strengths of slope materials (soils, roots, etc.). Mass wasting is initiated when shear stress on a material exceeds its shear strength threshold (Ritter et al. 2002). The volume of material generated from hillslope mass wasting events can be very large, and is often the predominant source of sediment and large wood delivered to streams in the Pacific Northwest (Swanson et al. 1982).

Sediment can also move downslope through gradual, diffuse processes such as rainsplash and rills that form from overland flow. Rainsplash takes place when raindrops loosen the soil particles making them more



Skagit Valley agriculture/Jane Atha, WDFW

susceptible to entrainment by overland flow (Furbish et al. 2009; Dunne et al. 2010). Overland flow can be concentrated into small, narrow, shallowly incised micro-channels that are carved into hillslope soils (Selby 1993). These channels, termed rills and gullies (with gullies being deeper) can form effective conduits for sediment erosion into stream channels (Wohl 2014).

Sediment delivered from riparian areas can be generated by mechanisms other than direct streambank erosion. Riparian sediment sources can be associated with treefall that results in the uprooting of trees (root throw; Hairston-Strang and Adams 2000; Liquori 2006). The primary causes of treefall include wind along newly created edges in riparian forest (Liquori 2006; Reid and Hilton 1998), undercutting streambank erosion, and large-scale disturbances such as fire or pest infestation. Root throw can provide direct sediment inputs to the channel (Lewis 1998; Reid and Hilton 1998; Gomi et al. 2005). Harris (1977) found that windthrow-related sediment production along a stream in coastal Oregon was responsible for 33 tons of sediment per mile of stream per year (18.6 metric tons per kilometer per year) (as cited in Gomi et al. 2005).

Riparian vegetation can effectively trap and store sediment transported downslope from overland flow (Naiman et al. 2010). This topic is fully explored in Chapter 5, Pollutant Removal. Once the sediment is deposited in riparian areas, plant roots facilitate stabilization and continued storage of sediment (Allmendinger et al. 2005; Tal and Paola 2007).

2.4.2. Instream Sediment Transport and Deposition

Sediment that has entered the stream channel can be transported downstream as dissolved load, suspended load, or bed load. Dissolved load carries sediment within solution, which can be substantial in some rivers (Knighton 2014). The concentration of solute is highest in water entering the channel through subsurface pathways because slower rates of subsurface water

movement allow for longer reaction times with the surrounding environment. Solute concentrations through subsurface pathways tend to lessen with greater discharge (Wohl 2014). Suspended load refers to sediment carried as suspended particulates in the water, and originates predominantly from bank erosion and surface erosion from upland areas. The finest size fractions of suspended transport, known as wash load, are more likely to be supply limited, i.e., the amount in transport is limited by the amount available. In contrast, the coarser bed load, which consists of larger rocks that bounce along the channel bed, is typically limited by transport capacity of flowing water (stream energy). Bed load may not get suspended; it can roll and slide during low flows, saltate (bounce) at intermediate flows, and move as sheetflow during high flows (Wohl 2014). Bed load transport processes are surprisingly complicated because many factors, some of which interact, determine the threshold for movement. These factors include the range of sediment sizes, their spatial arrangement, and channel form within a reach (Knighton 1984).

Bedforms are bed undulations that result from sediment transport and deposition. Montgomery and Buffington (1997) classified stream channels based on common bedforms (i.e., cascade, step-pool, plane-bed, pool-riffle, and dune-riffle), their dominant sediment transport process, and behaviors of debris flows and instream wood. The role that sediment plays in aquatic habitat can differ dramatically among those classes. For example, sediment in headwater channels (often classified as cascade or step-pool) tends to be stored behind boulder and wood obstructions. In lower gradient channels, sediments become sorted into pools and riffles depending on instream wood load, gradient, and a wide variety of other factors (Benda et al. 2005; Gomi et al. 2005).

All bedforms are depositional features. Deposition occurs when the flow or shear velocity in the stream falls below the settling threshold velocity of the sediment particle. Settling thresholds are lower than entrainment thresholds, and deposition can be localized or extended across a channel length depending on fluctuations in flow velocity (Wohl 2014). Riparian vegetation can be especially instrumental in facilitating deposition within channels and along banks (Tal et al. 2004). Establishment of riparian vegetation can initiate a positive feedback process as plants trap and stabilize sediments and organic matter that provides sites for germination of plants, which can then reinforce the development of floodplains, instream islands, and other landforms.

Erosional forces in the streambed can be increased due to topographic constrictions or locally steep gradients. Where hydraulic forces overcome surface resistance, channel incision can occur (Wells et al. 2009). Channel incision that occurs at the channel head, known as a headcut, results in vertical faces that separate upslope unchanneled environments from downslope channels. Headcuts that destabilize or incise an otherwise stable channel bed result in significant increases in sediment yield (Meyer et al. 1975; Bryan 1990). Headcuts can also occur as an upstream-migrating "step" in the channel bed that forms as a result of hydraulic scour, often from manipulations to the channel or flow conditions (e.g., culverts, diversions, etc.). This type of headcut can migrate upstream and change channel form for long distances.

Establishment of riparian vegetation can initiate a positive feedback process as plants trap and stabilize sediments and organic matter that provide sites for germination of plants, which can then reinforce the development of floodplains, instream islands, and other landforms.

A combination of field, experimental, and theoretical research has dramatically advanced our understanding of sediment transport dynamics as well as the role of vegetation in stream morphology. Sophisticated flume experiments and computational models have confirmed the importance and complexity of interactions among water, sediment, wood, and vegetation (Gurnell 2014). Recent modeling efforts have placed these phenomena on solid theoretical footings and have allowed researchers to explore scale dependence. We know much less about these interactions at small scales (single plant), however, understanding smaller scale phenomena is crucial to fully understanding longer-term and larger-scale geomorphic form and process (Gurnell 2014).



Bank erosion along the upper Chehalis River/Jane Atha, WDFW

2.4.3. Streambank Erosion

Streambank erosion is a geomorphic process that is integral to a watershed's natural disturbance regime and necessary for long-term ecological sustainability (Florsheim et al. 2008). Bank erosion is a key process for maintaining the structural diversity of aquatic and riparian habitats; it initiates community succession that promotes ecological diversity of riparian areas, and contributes coarse sediment to streambeds that is an essential habitat element for benthic invertebrates and spawning salmon. Bank erosion commonly occurs on the outside of river bends, but it can also occur in straight channels where changes in water or sediment supply cause channel incision. Instream large wood or mid-channel gravel bars that divert flows toward a bank (Florshiem et al. 2008) can also cause bank erosion. Local bank erosion is a naturally occurring process that is often indicative of a channel in dynamic equilibrium. Despite this fact, bank erosion at any scale is commonly misinterpreted as a sign of channel instability. Human disturbances can increase rates of bank erosion, and thus, understanding whether bank erosion is triggered by human activities or natural geomorphic processes is important for site-scale management (Polvi et al. 2014).

Two types of processes result in bank erosion: fluvial erosion and mass wasting (ASCE 1998). Fluvial erosion is the separation of sediments from a streambank's surface by the forces of flowing water. Fluvial erosion may destabilize riparian vegetation by exposing plant roots or undercutting vegetation (Florsheim et al. 2008). Fluvial erosion can eventually lead to mass wasting ("bank failure"). Mass wasting at streambanks is caused by scour of the streambed and bank toe that increases bank height and angle. When gravitational forces on the bank (weight of soil, water, and overlying vegetation) exceed the shear strength of the bank material, a portion of the bank collapses along a failure plane (Simon et al. 2000). Both types of bank erosion occur mainly during peak flows, but the association between flow magnitude and amount of bank erosion varies greatly among



Building in danger from streambank erosion on Newaukum River/Kaysie Cox, WDFW

watersheds. Wolman (1959, as cited in ASCE 1998), for instance, reported that significant bank erosion on a creek in Maryland occurred more than ten times per year during relatively small but frequent peak flow events. Studies of other alluvial systems have found that significant bank erosion was caused mostly by large floods with recurrence intervals of decades or more (ASCE 1998).

The stability of streambanks is influenced by soil characteristics, groundwater, and vegetation (Hickin 1984; NRC 2002). Mass wasting failure mechanics, for example, are quite different for cohesive and noncohesive soils (ASCE 1998). Adjacent surface waters or ground water affects pore water pressure, and positive pore water pressure destabilizes banks by reducing cohesion and friction amongst soil particles. Water in soil also adds mass, thereby increasing gravitational forces acting on a streambank. Bank failure often occurs shortly after flood waters recede because soils are at or near saturation and the laterally confining hydraulic pressure of the floodwaters decreases to zero (Rinaldi et al. 2004).

Vegetation may have mechanical and hydrologic effects on bank stability, and these effects can be stabilizing or destabilizing (Simon and Collison 2002; Langendoen et al. 2009; Pollen-Bankhead and Simon 2010). Soil is generally strong in compression, but weak in tension. Woody and herbaceous plant roots are strong in tension, but weak in compression. Consequently, the root-permeated soil of streambanks behaves as a composite material with enhanced strength (Simon and Collision 2002; Pollen and Simon 2005). However, the additional bank strength provided by roots is species dependent (Polvi et al. 2014). Simon et al. (2006), for instance, found that Lemmons's Willow *Salix lemmonii* provided an order of magnitude more root reinforcement of streambanks than Lodgepole Pine *Pinus contorta*. Dense root networks also physically restrain or bind soil particles. In addition, exposed roots on the bank surface increase channel roughness, which dampens stream flow velocities, thereby reducing fluvial erosion (Griffin et al. 2005; Gorrick and Rodríguez 2012). In fact, fluvial erosion of well-vegetated banks is 10 to 100 times less than erosion of unvegetated banks (ASCE

1998). Reduction of stream velocities by roots may also cause sediment deposition, which further stabilizes streambanks.

Vegetation has destabilizing mechanical effects as well (ASCE 1998; Simon and Collison 2002). The weight of vegetation adds a "surcharge"[2] load to soil. Hence, the weight of vegetation increases the vertical shear stress near a streambank and adds to the lateral earth pressure[3] at the streambank surface, however, these effects can be minimal relative to soil's weight (Simon et al. 2006). Additionally, tall, stiff vegetation may impose destabilizing forces on streambanks during windstorms (ASCE 1998).

The hydrologic effects of plants on streambank stability are those that influence soil moisture. Through canopy interception, vegetation reduces the amount of precipitation that reaches soil. Transpiration, which extracts water from the soil column within the root zone, creates negative pore water pressures (matric suction) that increase soil shear strength (Simon and Collison 2002). Plants destabilize streambanks by facilitating infiltration of water into soil via flow pathways ("macropores") created by live and decayed roots. In addition, stemflow tends to concentrate precipitation around the base of stems, creating higher local pore water pressure. The net hydrological effect of vegetation can be significant. Simon and Collision (2002), for instance, found in their study conducted in northern Mississippi that following a very dry period the stabilizing hydrological effect of tree cover was two times greater (220%) than tree cover's stabilizing mechanical effect. However, this result was reversed following a wet period; the stabilizing mechanical effect of tree cover was 159% of tree cover stabilizing hydrological effect.

The bank stability function of riparian vegetation has important implications for riparian area management. FEMAT (1993:V-27) created a generalized curve of root strength versus distance from channel based on expert opinion informed by scientific literature. The radius of Douglas-fir *Pseudotsuga menziesii* root networks are highly correlated with tree crown radius (Smith 1964).[4] Hence, FEMAT (1993) assumed the contribution of root strength to maintaining streambank integrity declines at distances greater than one-half a crown diameter. Using linear regression, Roering et al. (2003) derived a power-law relationship for coniferous trees between root network radius and tree diameter. This relationship suggests that large diameter conifers (36 to 48 inches [91 to 122 cm] diameter breast height) have root network radii that measure 16 to 33 ft (5 to 10 m). Hence, in an undisturbed old-growth riparian forest, the full contribution of root strength to streambank stability is provided by trees within approximately 33 ft (11 m) of the streambank.

2.4.4. Lateral Channel Migration

Lateral channel migration affects sediment erosion and deposition, local topographic relief, flood inundation patterns, river planform, alluvial architecture, and riparian vegetation patterns, which in turn results in a complex arrangement of aquatic and riparian habitats across a river's floodplain (Naiman et al. 1993). Lateral channel migration occurs through the processes of meander bend development, avulsions, and channel widening and narrowing (Rapp and Abbe 2003). These processes occur through fluvial erosion of intact bank material and mass failure of streambanks under gravity, followed by mobilization and transport of the disturbed material (Burckhardt and Todd 1998).

2 A surcharge load is any load imposed upon the soil surface close enough to a streambank to cause lateral pressure to act on the bank. "Surcharge" denotes an extra force in addition to the weight of the soil.

3 Lateral earth pressure is the pressure (i.e., force per area) that soil exerts in the horizontal direction.

4 The ratio of root spread to crown width for small Douglas-fir and Western Hemlock *(Tsuga heterophylla)* (mean dbh about 13 inches [33 cm]) was reported by Smith (1964) to be about 1. Data in Eis (1987) for these same tree species suggest a ratio of about 2.

One mechanism of channel migration is meandering, which is one of the most common river-channel patterns (Güneralp and Marston 2012). Given time, and lacking physical obstructions, a natural unimpeded meandering channel can swing and shift across its valley in the downstream direction, completely disturbing the floodplain (Schumm 1977). The floodplains of meandering rivers are low-lying depositional features that store large volumes of sediment, and reflect the history of erosion and deposition of a river occupying the valley floor (Dunne and Leopold 1978). The time needed for a channel to migrate and occupy its entire floodplain is expressed as a "floodplain turnover rate," which may take tens to thousands of years in western Washington. Beechie et al. (2006) found, for example, that braided channels in rivers of the Cascades and Olympic mountains had a turnover rate of 25 years. In contrast, O'Connor et al. (2003) estimated turnover rates for two large rivers on the Olympic Peninsula to be approximately 200 to 2000 years. The channel migration rates for the rivers in O'Connor et al.'s study ranged from 13 ft (4.0 m) to 42 ft (12.7 m) per year.

Sediment erosion and deposition patterns that result in channel migration are caused by complex flow patterns along meander bends. Water tends to develop a horizontal swirling flow as a result of greater roughness along the banks than in the center of the channel. This swirling flow, termed "helical flow", is generated by the super elevation of the water's surface as it flows along the outside of a bend (Callander 1978). Helical flow creates large cross-stream variation in velocity (Dietrich et al. 1984), and the reduced velocity and bed shear stress at the inside of a bend creates pointbar deposition. In addition, pointbars deflect flow laterally toward the cutbank, creating topographically driven secondary flow that further induces an outward velocity shift toward the cutbank (Güneralp and Marston 2012).

Movements of individual meanders are described as: 1) simple migration (or translation), which is a downstream shift without significant shape change; 2) extension (or growth), where the amplitude of the bend extends by migrating across the valley; 3) rotation, in which the bend axis changes orientation; and 4) lobing and compound growth, where the bends become less regular and symmetrical (Hooke 1984). Individual bends along a meandering channel can have different styles and rates of migration, and typically deform and become asymmetrical with migration. Meander migration that increases the amplitude and tightness of bends can lead to a cutoff channel that creates a shorter flow path across the inside of a pointbar or a neck cutoff at the base of the bend. The increase in channel gradient from the cutoff causes it to become the main channel, and the longer flow path becomes a secondary or overflow channel on the floodplain. Secondary channels may function as side channels that are important rearing habitat for juvenile salmonids (Rosenfeld et al. 2008) or



Chehalis River meander bend/Jane Atha, WDFW



Mid-channel bar/Jane Atha, WDFW

oxbow lakes, which are habitat for amphibians (Henning and Schirato 2006). The increased habitat diversity for aquatic and riparian organisms can persist for decades to centuries depending on rates of sediment filling.

Another mechanism for channel migration is avulsion, which is the rapid abandonment of a river channel and the formation of a new river channel. Avulsions can occur with little erosion of the land between the old and new channel locations (Allen 1965; Butler 2004). An avulsion can cause rapid, dramatic shifts in channel location from one side of the valley bottom to the other, and can occur during a single flood event. Avulsions are often associated with aggrading channels, but this is not a necessary requirement (Tooth et al. 2007). Meander cutoffs, for example, are a type of avulsion not derived from aggradation. In the Pacific Northwest, wood jams often cause and mediate avulsions, acting to maintain a multiple-channel pattern. Wood jams can cause avulsions by plugging channels and diverting flow into a relict channel that then becomes the main channel (Collins and Montgomery 2002).

Along alluvial rivers, spatial and temporal patterns of riparian vegetation composition and structure are controlled by rates of channel migration and vegetation response to disturbance (Figure 2.4). As channels migrate laterally, pointbars create conditions for recruitment of early successional plant species. Over long periods, pointbar growth is followed by the succession of terrestrial plant communities. Consequently, a pointbar may support a chronological series of successional stages arranged from youngest closest to the active channel to oldest farthest from the channel (Shankman 1993). A limited number of species consistently dominate the accreting edge of pointbar landforms, while progressively more species establish as the pointbar aggrades to a higher surface elevation (Meitzen 2009). Opposite these pointbars, eroding cutbanks expose and remove previously established mature vegetation, but also open edge habitat for colonization by new plant species. Kupfer and Malanson (1993) found that cutbank edge forests have higher stem densities and greater species richness than floodplain interior forests.

Lateral channel migration and related streambank erosion processes can pose risks to human communities located near rivers and large streams. Likewise, human actions intended to limit channel migration can degrade aquatic and riparian habitats. For these reasons, geomorphologists have developed protocols for determining the channel migration zone (CMZ). A CMZ includes the outer extent of historical channels, plus the area where future channel migration could occur over some time period (e.g., 100 years). CMZ delineation considers the historical migration zone, i.e., the area encompassing all historical channels; the avulsion hazard zone, i.e., areas not in the historical record that are at risk of avulsion; and the erosion hazard area, i.e., the area at risk of bank erosion from stream flow or mass wasting over the time horizon of the CMZ (Rapp and Abbe 2003). The CMZ typically encompass floodplains and some portion of terraces (landform remnants of the former floodplain). The CMZ also includes channels and terrace banks that are at risk of mass wasting due to erosion of the toe.

Lateral channel migration produces a spatially dynamic riparian ecosystem. Because the riparian ecosystem (i.e., the riparian zone and zone of influence) is defined by proximity to water, as the active channel moves back

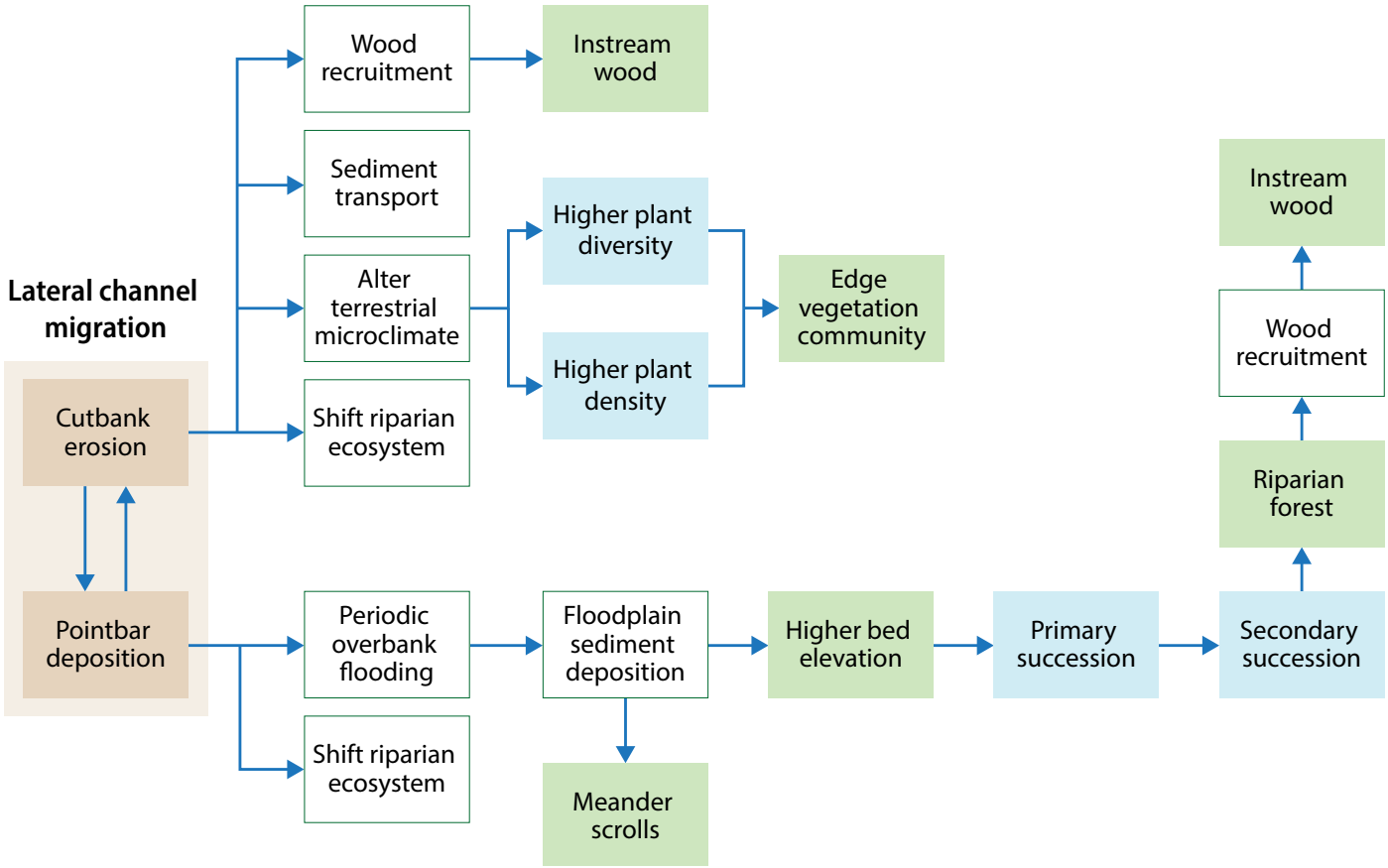
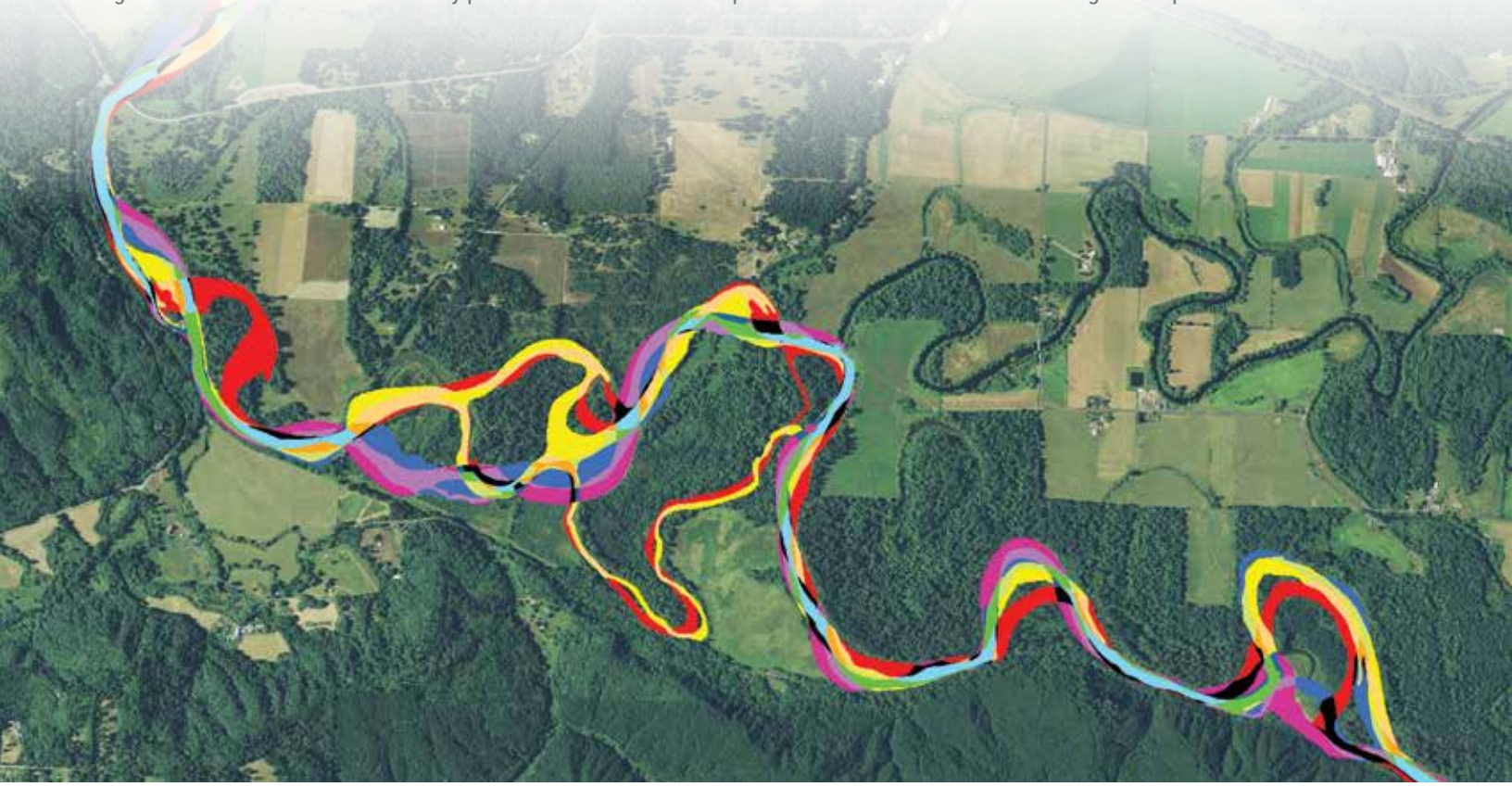


Figure 2.4. A conceptual model of lateral channel migration processes and riparian forest responses (modified from Meitzen 2009). Arrows indicate the hypothesized directions of causal relationships. Brown boxes represent proximal processes leading to channel migration. White boxes are secondary processes. Green boxes depict structures. Blue boxes are biological responses.



Chehalis River meander paths between 1938 and 2013/Ken Pierce, WDFW

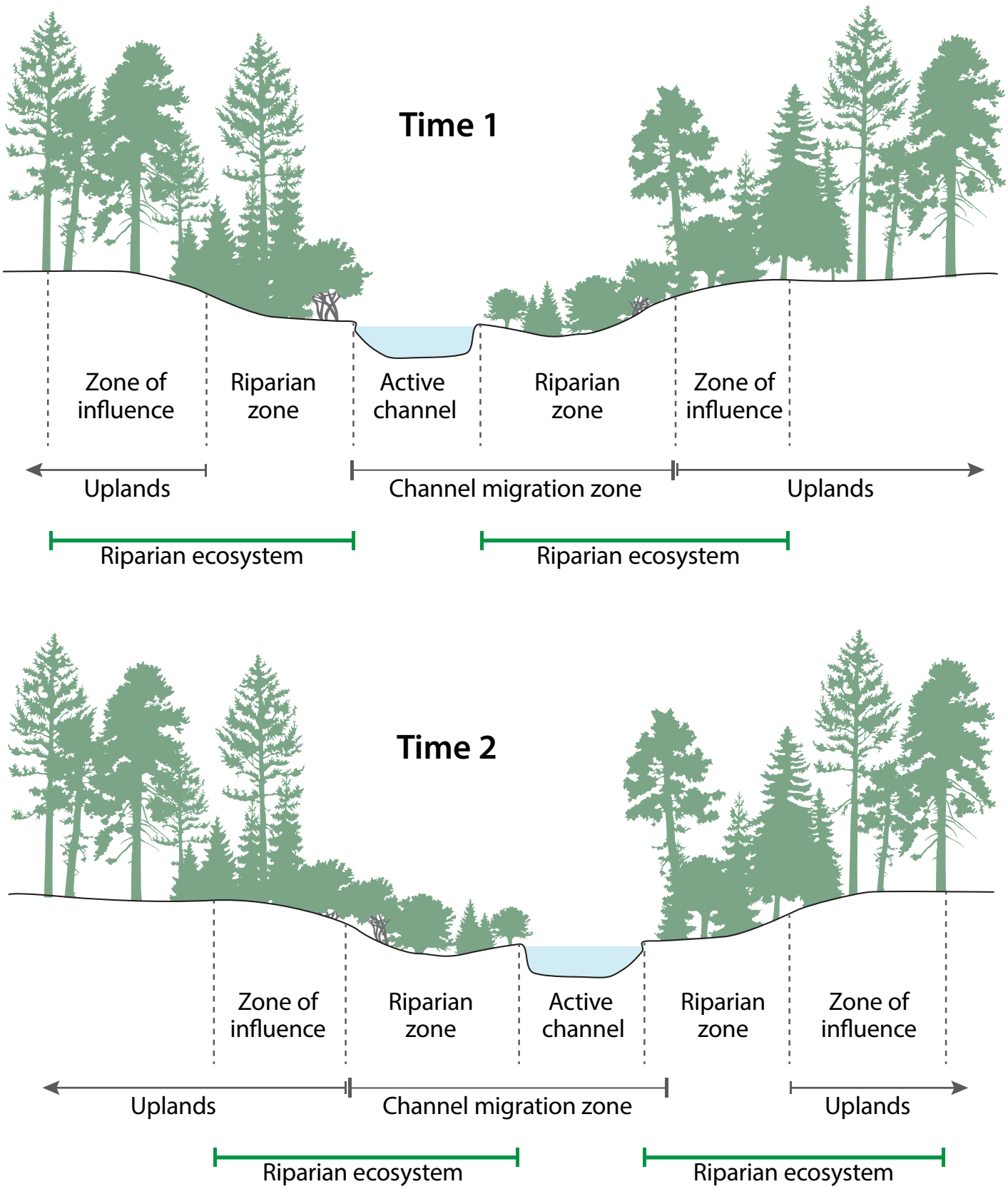


Figure 2.5. Spatial relationships between the riparian ecosystem and channel migration zone (CMZ) over time. As the active channel moves laterally within the CMZ the riparian ecosystem moves with it. Time 1 and time 2 could be separated by days or centuries.



Quinault River/Jane Atha, WDFW

and forth across the CMZ, the riparian ecosystem moves with it (Figure 2.5). Consequently, over long periods of time, a riparian ecosystem will occupy different parts of the CMZ. Furthermore, when an active channel reaches the outside limit of its CMZ, the riparian ecosystem lies outside and adjacent to the CMZ. Hence, to maintain riparian ecosystem functions, management must anticipate and protect future locations of the riparian ecosystem.

2.5. Disturbances

2.5.1. Geomorphic Process Domains

The spatial variability of sediment sources and the varying capacity of water to transport sediment result in a mosaic of different channel forms within a watershed. Channel forms can be described by attributes such as bed and bank sediment size distributions, pool and riffle depths, bankfull widths, gradient, and sinuosity. The classification of channel forms has been refined over the last 30-40 years beginning with Schumm (1977), who distinguished a headwater production zone, mid-basin transfer zone, and downstream depositional zone. This longitudinal arrangement is also reflected in more recent work that defines geomorphic *process domains*. Process domains characterize differences in the types and frequency of disturbance events, and provide a way to represent spatial differences in disturbance regimes (Montgomery 1999).

Six common geomorphic process domains have been identified for forested watersheds of Washington State: hillslope, unchanneled hollows, debris-flow channels, bedrock-fluvial channels, coarse-bed alluvial channels, and fine-bed alluvial channels (Montgomery et al. 1996; Sklar and Dietrich 1998; Montgomery 1999). These process domains are important to distinguish since they

each function differently in terms of sediment dynamics and transport capacity. Note that although geomorphic process domains often occur in a regular longitudinal sequence, there are many exceptions in Washington State where this is not the case.

Hillslopes are unchannelized and are typically dominated by diffusive transport or rain-facilitated transport of sediment downslope. Unchanneled hollows are hillslope concavities that serve as sediment storage sites and source zones for hillslope mass movement (Dietrich and Dunne 1978; Montgomery et al. 2009). Debris-flow channels are dominated by mass wasting sediment dynamics but channel geometry may still be influenced by fluvial processes. Bedrock-fluvial channels have underlying exposed bedrock that limits boundary erosion. In these channels, overlying alluvium is transported by scour during higher flows, and transport capacity exceeds sediment supply, resulting in exposed bedrock. Coarse-bed alluvial channels are dominated by unconsolidated gravels, cobbles, and boulders and are more likely to be supply limited, rather than stream energy limited. Lastly, fine-bed alluvial channels have non-cohesive sand-sized sediment and are more likely to be transport limited by flow energy rather than sediment supply (Wohl 2014).

Using process domains, it is possible to identify within a watershed where different geomorphic processes, disturbance regimes, and responses to disturbance dominate, and predict riparian vegetation dynamics (Naiman et al. 2000; Polvi et al. 2011). Channel morphology correlates well with bed gradient and sediment supply (Montgomery and Buffington 1997). The differences in the balance of hydraulic forces and available sediment among these channels likely lead to differences in overbank processes that can affect vegetation establishment, growth, and mortality. For example, in higher gradient channels, energy is expended on transporting sediment downstream and is not available to reshape the riparian area.

Disturbances are relatively discrete disruptive events that change the physical environment or resource availability, and are essential for developing habitat to support native biota.

2.5.2. Natural Disturbance Regimes

From an ecological perspective, disturbances are relatively discrete disruptive events that change the physical environment or resource availability (Pickett and White 1985); thereby creating opportunities for other species to become established (Nakamura and Swanson 2003). Natural disturbances result in dynamic habitats of varying physical conditions that allow for a variety of species to coexist. Community succession theory recognizes that large-scale disturbances, such as low frequency, high magnitude floods, continually reinitiate community succession in riparian areas (Pickett et al. 1987; Corenblit et al. 2007). The cycle of disturbance and succession occurring throughout a watershed maintains compositional and structural diversity in aquatic and riparian ecosystems. Disturbances that influence streams and riparian areas include wildfire, floods, landslides, tree infestations by insects, and human-induced disturbances such as residential development, timber harvest, and road construction.

Disturbance processes are essential for developing the range of habitat conditions necessary to support native biota (Swanson et al. 1998; Tabacchi et al. 2000). For example, the coarse sediments and large wood delivered to streams via mass wasting are thought to be essential components of freshwater salmonid habitats (Reeves et al. 1995). A natural disturbance regime can be characterized by frequency (how often), magnitude

(how big), duration (how long), and predictability. Wildfires of a given magnitude, for example, occur with a particular statistical probability in the absence of human manipulation of a watershed (Agee 1993). In general, smaller, frequent, and varied disturbances increase the heterogeneity of channel forms, leading to an environment that is more diverse and species rich (Kauffman and Martin 1989; Malanson 1993; Tabacchi et al. 2000; Everett et al. 2003). For example, the dynamics of stream channels that result from frequent, low intensity wildfires determine short-term patterns such as seed germination and animal foraging behavior (Hughes 1997). The influence of moderate and frequent disturbances such as fire (Wright and Bailey 1992) or insect-induced tree mortality (Mattson and Addy 1975) may lead to minor reductions in the riparian canopy, but more diverse habitat conditions that are generally beneficial for salmonids (Naiman and Bilby 1998). By contrast, disturbances that are large and infrequent tend to lead to widespread alterations that have larger and longer-lasting physical impacts. Large disturbances could cause a geomorphic threshold to be exceeded, and the resulting fluvial response could manifest a new geomorphic state with different physical conditions that support a different biological community (Hughes 1997).

Human activities can either dampen or amplify disturbance processes. While natural disturbance processes are ongoing, they are modified by human alterations (e.g., dams eliminate or dampen flood flows and land management can reduce the frequency and severity of fires). Too little or too much disturbance may have detrimental impacts on the physical structure of streams and riparian areas. For example, too little flooding can lead to cementation of the streambed or loss of riparian vegetation, especially in arid regions. Conversely, too much flooding caused by land cover change, for example, can lead to less habitat complexity due to excessive scouring of the channel. The past and current management of a site–and of its greater watershed–may alter the natural disturbance regime resulting in ecosystem states that did not exist historically.

Process domains within a watershed exhibit different disturbance regimes which manifest different aquatic and riparian ecosystems. Disturbances, and where they occur within a watershed, play key roles in structuring ecosystems. Important advances have shifted focus from single channel reaches and disturbance events to processes occurring at larger geographic extents over longer periods of time, that establish linkages between watershed-scale conditions and natural disturbance regimes (Naiman and Bilby 1998; Nakamura and Swanson 2003).

2.5.3. Human Alteration Impacts

Thus far, this chapter has largely focused on the hydrologic and geomorphic processes and their interactions with riparian area vegetation as they naturally occur within a watershed. However, human influences on channel form are ubiquitous, and therefore should be considered in management of riparian areas.

How a channel responds to human alterations of the landscape or riparian areas depends on its sensitivity and resilience (Brunsden and Thornes 1979).



Narrow riparian buffers along Badger Creek/Jennifer Nelson, WDFW

A sensitive channel reach changes in response to human alterations. A resilient channel reach also changes in response to human alterations but will return to its prior condition at some later time. The idea that some parts of a river are more or less sensitive or resilient is critical to predicting channel adjustments. For example, stream reaches with high transport capacity may adjust relatively quickly to an increase in upstream sediment yield but a similar change in sediment yield may cause significant changes in channel morphology in reaches with low transport capacity. The shape, hydraulics, and natural disturbance regime of a reach may indicate its sensitivity to anthropogenic disturbance. For example, a channel that is degrading (lowering bed elevation) may be more sensitive to riparian large wood additions than a channel that is in equilibrium. In addition, sensitivity to changes in hydrology is inversely proportional to channel gradient (Wohl et al. 2007). Hence, managers should anticipate that high gradient streams will be more sensitive to changes in stream flow than lower gradient streams. Other drivers such as the flow regime or controls such as lithology might also be used to determine a reach's sensitivity and resilience, and thereby inform management decisions.

Forestry

An extensive body of scientific literature documents the effects of forestry on stream channels (see Foley et al. 2005; Scanlon et al. 2007; and Wohl 2013 for thorough reviews). Cutting of trees and road building associated with forestry can greatly increase sediment yields and affects water yields over multiple decades as vegetation recovers (Wohl 2014). Impacts from road networks—for logging and otherwise—are numerous and are discussed below. Changes in sediment supply and water yield due to logging can alter the streamflow, stream chemistry, and channel morphology of a stream reach (Liquori et al. 2008). In addition, the resilience of channels in response to such alterations can be quite variable. For example, Madej and Ozaki (1996) found that channel recovery (defined as returning to a former bed-elevation) after a sediment wave following extensive logging in Redwood Creek basin, Northern California varied from 8 years in one creek to 15 years in another. A third channel had not yet recovered.



Clearcut hillslope/Jane Atha, WDFW



Big Beef Creek, Kitsap Peninsula/Ned Pittman, WDFW

There is substantial agreement among scientists as to the potential magnitude and consequences of peak flow changes due to forestry. Grant et al. (2008) assessed the effects of forestry on peak flows and consequent channel response in the Pacific Northwest in a state of the science report. Their findings, primarily synthesized from long-term monitoring, show that responses are complex, and vary with runoff type (snowmelt, rainfall or rain-on-snow), local hydrology, harvest treatment, and channel type. The authors generally noted that geomorphic changes from harvest-related peak flow effects are limited to low-gradient channels (below 2% grade) and are generally minor as compared to other anthropomorphic impacts. Other literature reviews (e.g., Liquori et al. 2008; Grant et al. 1999) had similar conclusions.

The degree to which forestry practices alter water and sediment yields depends on where the logging occurs within a drainage basin. In one study, logging at lower elevations in snowmelt-dominated basins of southwestern Canada caused little to no change in peak flow because of relatively small snowpack, whereas in the higher elevations the peak flow changed significantly (Whitaker et al. 2002). Similarly, characteristics such as climate, topography, and soils also determine landscape sensitivity to forestry. Several studies have shown that mean annual precipitation is a reasonable indicator of impact (e.g. Anderson et al. 1976; Coe 2006; CBOF-TAC 2008). A road network may deliver 20% of sediment to stream channels in areas with 22 in (500 mm) per year average precipitation compared with 50% of the sediment when precipitation exceeds 118 in (3,000 mm) per year (Coe 2006). In areas of high topographic relief, it is particularly challenging for researchers to differentiate channel adjustments induced by logging from change that would have occurred without interference (Marston 2008).

Conversion of riparian areas from forest to other land uses can cause channel narrowing and deepening (Anderson et al. 2004; Sweeney et al. 2004; Faustini et al. 2009). Furthermore, streams without riparian forests often exhibit channels with less wood that are narrower, deeper, have fewer obstructions, less variability in active channel width, higher proportions of run and glide habitats, and lower habitat diversity (Jackson et al. 2014).

Road Infrastructure

Road networks are similar to stream networks in that they are often widely distributed, transport energy and material across a landscape, and have a high edge length per unit area enabling interaction with adjacent hillslopes (Jones et al. 2000). Stream networks and road networks commonly occur in similar densities in wet-climate forested mountains where logging has occurred (Wemple et al. 1996).

The biggest impact of unpaved roads on aquatic systems is sedimentation. Road construction and maintenance disturbs a layer of soil on the road tread, adjacent drainage ditch, and cutslopes that becomes easily eroded material (Megahan 1974). In conjunction with other loose material on roads, higher erodibility increases the total sediment yield from a road segment (Luce and Black 1999). In managed forests of Washington State, unpaved roads and trails are the most significant management activity that affects

sediment production and delivery into streams (Lewis 1998; Gomi et al. 2005; CBOF TAC 2008). Roads can initiate mass movements that tend to result in longer runout zones and more sediment than their naturally occurring counterparts do (May 2002). Sediment generated from roads can be delivered to streams via ditches and gullies below cross-draining culverts that concentrate and route runoff. Road sediment production varies substantially with the type of surfacing material, road slope, mean annual precipitation, geology, traffic type and volumes, and road area (Cafferata and Munn 2002; MacDonald et al. 2004; Coe 2006). Roads and water crossings with improper design or maintenance are often the most significant sources of erosion and sediment delivery to streams in forested watersheds (Madej 2001; Cafferata and Munn 2002). Jones et al. (2000) found that unpaved roads continue to contribute sediment fines to channels long after harvested vegetation has reestablished.

Agriculture

Agriculture, in the form of livestock grazing or crop production, can reduce and alter vegetation cover, compact soils,and reduce water infiltration. It can also increase runoff and sediment yield, and cause associated changes in streamflow, channel morphology, and channel stability.

Cattle grazing can severely degrade riparian areas particularly through vegetation reduction and trampling of streambanks. Grazing animals can create ramps along streambanks and trails along the floodplain that enhance localized erosion (Trimble and Mendel 1995). Grazing-disturbed streams are usually characterized by a lack of overhanging banks, wide and shallow channels, smaller pool area, high sediment yields and turbidity, steep gradients, and channel beds typified by long stretches of glides or runs. Along streams with enclosures that kept cattle out of riparian areas, Magilligan and McDowell (1997) found that channel widths became narrower due to increased roughness by grassy riparian vegetation, which ultimately traps sediment leading to width reductions. The channel narrowing effects of grassy vegetation were also reported by Sweeney et al. (2004) and Allmendinger et al. (2005).

Understanding a channel's state of equilibrium (or disequilibrium) and its potential future states is critical for restoration and protection of salmon habitats.

A common effect of planting crops is increased sediment yield and associated changes in channel pattern and stability (Wohl 2014). The magnitude of these changes is dependent on the type and extent of crops, as well as the topographic and soil characteristics at a site. Numerous case studies indicate that soil erosion from conventional agriculture exceeds rates of natural erosion by up to several orders of magnitude (Montgomery 2007).

Urban/Suburban

Research on the effects of urbanization on sediment yield and channel response date back almost 50 years and is global in reach (Wolman 1967). The results of this research draw similar conclusions regarding the sequence of changes that occur within a drainage basin, with differences occurring only in the magnitude and timing (Chin 2006).

Erosion rates can reach up to 40,000 times pre-disturbance rates on land surfaces cleared for building that remain bare for up to a year (Harbor 1999). Construction sites can dramatically increase sediment yield from an urbanizing basin (Fusillo et al. 1977). For example, sediment production from Issaquah Creek



Mill Creek, Walla Walla, Washington/Jane Atha, WDFW

watershed in western Washington had two- to five-fold increases when only 0.3% of its 55.6 mi^2 (144 km^2) drainage area was under construction (Nelson and Booth 2002). Upon completion of construction, sediment yield usually decreases to negligible amounts as urbanizing areas are stabilized beneath roads, buildings, and lawns.

Research on the effects of urbanization on hydrology and flooding is also extensive, and dates back at least 50 years. Collectively, this research clearly shows that urban development, and associated increases in impervious surfaces, leads to larger and more frequent floods (Leopold 1968). The key metrics of change are peak discharge, lag time, flood frequency, and total runoff or water yield. Morphological adjustments have been studied in response to hydrologic changes, with most studies showing increases in channel width (Chin 2006).

Stream Channel Modifications

Humans have been directly altering stream flow and channel form for centuries (Poff et al. 1997). Flow regulation, through dams, reduces the size and variation of annual peak flows (Williams and Wolman 1984), increases minimum flows (Hirsch et al. 1990), shifts the timing of seasonal flows, and can alter diurnal flow fluctuations if the dam is used for hydroelectric power generation (Magilligan and Nislow 2001).

Dams can have dramatic effects on aquatic and riparian systems (Nilsson et al. 1997; Nilsson and Berggren 2000; Katz et al. 2005; Merritt and Wohl 2006). Dams disconnect the channel from the floodplain by reducing peak flows. This decreases or eliminates freshly scoured surfaces necessary for seedling establishment in riparian areas. Flow regulation can disrupt downstream transport of seeds to germination sites, and seedlings established on gravel bars may die from prolonged submersion when managed flows are higher than natural flows. Changes in sediment size distributions and moisture content can also adversely impact riparian vegetation. The cumulative effects on riparian communities downstream of dams can result in fewer plant species and lower plant density (Jansson et al. 2000).

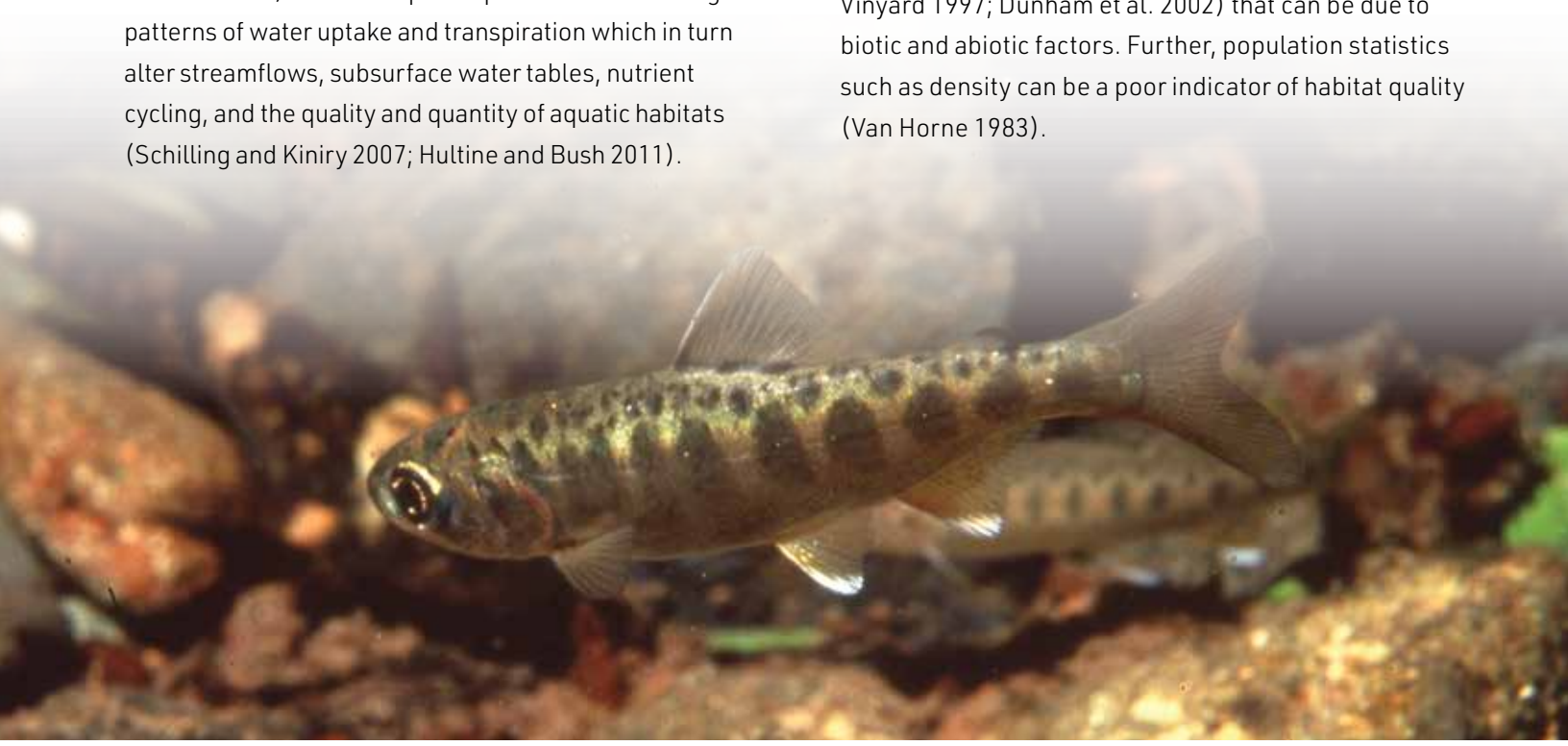
Humans regularly alter channel form through dredging, channel straightening, removing instream wood or Beaver dams, building check dams, extending channel networks via canals, burying or laterally shifting inconvenient channels, and simply reconfiguring a channel to be more esthetically pleasing. (Wohl 2014). Levees are a direct form of channel alteration particularly ubiquitous in lowland rivers. Levees are mounds built parallel to stream channels that limit overbank flooding, and are also known as dikes or embankments (Petroski 2006). Levees severely reduce or eliminate channel-floodplain exchanges, facilitate higher magnitude floods, and exacerbate flooding in downstream areas without levees. Disconnection between the channel and floodplain reduces deposition of sediment and organic matter in floodplains, leading to loss of habitat, reduced animal abundance, and lower biodiversity in riparian areas (Hohensinner et al. 2004).

Lastly, humans can indirectly and severely alter channel form by introducing invasive, exotic species to riparian areas. Invasive plants may displace native riparian plants and thus impact streambank resistance to erosion and overbank sedimentation dynamics (Graf 1978; Allred and Schmidt 1999). Invasive riparian plants can also change patterns of water uptake and transpiration which in turn alter streamflows, subsurface water tables, nutrient cycling, and the quality and quantity of aquatic habitats (Schilling and Kiniry 2007; Hultine and Bush 2011).

2.6. Fish and Wildlife Habitat

2.6.1. Fish

The fisheries and fish ecology literature are replete with studies that report relationships between fish and physical habitat conditions. Such studies demonstrate the profound importance of instream conditions for fish and they have helped guide habitat management and restoration. For example, Nickelson et al. (1992) found seasonal differences in the use of pool and riffle habitat by juvenile Coho Salmon *Oncorhynchus kisutch* and suggested that additional pool habitats might improve their survival. Such correlative approaches have been expanded by considering shifts in habitat use within species and differential habitat requirements among species in attempts to identify optimal habitat type configurations (Rosenfeld 2003; Bain and Jai 2012). However, the success of such approaches has been limited by high spatiotemporal variability in, for example, habitat-density relations among streams (Dunham and Vinyard 1997; Dunham et al. 2002) that can be due to biotic and abiotic factors. Further, population statistics such as density can be a poor indicator of habitat quality (Van Horne 1983).



Juvenile Chinook Salmon Oncorhynchus tshawytscha/*David Price, WDFW*

Recent scientific advances regarding the protection and restoration of fish habitats (and habitats for other vagile aquatic species) include the following: 1) acknowledgement of the importance and frequency of fish movement (Schlosser 1991, 1995; Gowan et al. 1994), 2) greater acknowledgement of the importance of habitat heterogeneity and spatial variability in fish-habitat relationships (Torgersen et al. 2006), and 3) the concept of riverscapes (Ward 1998; Fausch et al. 2002; Allan 2004), which describes a dynamic mosaic of habitat types and environmental gradients that are characterized by high connectivity and complexity.

The riverscape concept expands on the classic stream continuum concept of Vannote et al. (1980) mostly by explicitly incorporating spatial and temporal heterogeneity, discontinuities, and connectivity between stream reaches (longitudinal), the stream and uplands (lateral), and the stream and groundwater (vertical). Fausch et al. (2002) provide several principles for effective research and management given the riverscape concept. These include: 1) conduct research (and management) at appropriate scales for the question, 2) the importance of physical and ecological processes are revealed at different spatiotemporal scales and processes will interact among scales, 3) rare or unique features can be very important, and 4) unintended consequences of habitat degradation propagate in all directions, including upstream. Cumulatively, these principles and the vast research that supported their development suggest that the spatial extent and temporal duration of research and management must be matched to the scales at which populations of species use habitat and at which suitable habitat conditions are created and maintained. Further, they emphasize the importance of maintaining and restoring longitudinal and lateral connectivity of stream systems (Sedell et al. 1989) to allow for proper functioning of habitat forming processes and maintenance and restoration of supplementary and complimentary habitats to account for expected variability in local suitability.

Conducting research and management that incorporates the riverscape concept is challenging because it often requires study at large spatial and long temporal extents as well as monitoring biotic and abiotic processes at fine spatial and temporal resolutions. Perhaps the best examples of such work in Washington are the Intensively Monitored Watersheds (IMW) projects that are designed to assess the efficacy of stream restoration for increasing the freshwater survival and production of salmon (Bilby et al. 2005). The IMW projects are conducted at the spatial extent of watersheds and over the course of several salmon life cycles. Important physical and ecological processes are monitored within and among individual stream reaches with the intent of identifying rare features and measuring changes in habitat complexity and connectivity (Bennett et al. 2016). This approach should yield reliable inferences regarding the efficacy of restoration efforts that can be used to inform decisions via adaptive management (Bennett et al. 2016).

2.6.2. Amphibians and Reptiles

Amphibians are less conspicuous inhabitants of instream habitats than fish, but in much of the Pacific Northwest, particular groups of stream-breeding amphibian species that include giant salamanders (*Dicamptodon* spp.), tailed frogs (*Ascaphus* spp.), and torrent salamanders (*Rhyacotriton* spp.) dominate fishless headwater

The riverscape concept expands on Vannote et al.'s (1980) classic stream continuum concept by including lateral and vertical connectivity and incorporating spatial and temporal heterogeneity.



Coastal Tailed Frog Ascaphus truei *in metamorphosis/Marc Hayes, WDFW*

streams. Headwater streams represent a large majority (up to 80%) of the overall stream network based on its length (Meyer and Wallace 2001). Stream-breeding amphibian dominance in headwaters partly reflects the flow conditions in headwater habitats and the suitable physical conditions those flows create. Amphibian abundance is highest in step-pool and cascade reach morphologies characterized by armored beds, stable bedforms, refuge spaces amongst coarse bed material, and reduced tractive forces as a result of tumbling flow (Dupuis and Friele 2006). For example, torrent salamanders, the only stream-breeding amphibian group that does not attach their eggs to rocky substrates, deposit and conceal them in the lowest flow headwater ends of streams and their tributaries; higher flow habitats will dislodge or damage their eggs. In contrast, giant salamanders and tailed frogs, which glue their eggs to coarse rocky substrates, use concealed oviposition sites in stable step structures typically found further downstream in the headwater network (Hayes et al. 2006). Stream-breeding amphibians seem to become less abundant below headwater streams at least in part because substrate and flow conditions that provide either oviposition or refuge sites become less frequent (Brummer and Montgomery 2003). Other conditions, such as predation by fishes, also play a role.

The freshets (high water events) in larger streams or rivers that have an alluvial floodplain, when coupled with wood, are also critical to both creation and maintenance of off-channel amphibian habitats (Amoros and Bornette 2002). Off-channel habitats comprise among the most important lowland stillwater habitats representing key breeding and rearing areas for the largest group of native amphibians (stillwater breeders) (Richter 2005) and the garter snakes (*Thamnophis* spp.) that feed on them. Such off-channel habitats are also critical rearing and foraging habitat for native turtles (Holland 1994).

2.7. Conclusions

The interactions of water, sediment, wood, and riparian vegetation create complex channel morphologies and diverse aquatic habitat conditions. Reach-scale differences in sediment erosion, transport, and deposition result in a mosaic of aquatic habitat conditions within and among stream reaches.

Understanding a channel's state of equilibrium (or disequilibrium) and its potential future states is critical for restoration and protection of salmon habitats. Consistent with the idea of process domains, not all stream reaches within a watershed are equally sensitive or resilient to human land uses or other anthropogenic disturbances. Describing a channel's historical range of natural variability can aid in understanding a reach's potential response to human disturbance. A historical perspective may also aid in identifying biological communities that are in most need of habitat restoration (McDonald et al. 2004; Brierley and Fryirs 2009). By adopting a historical perspective, we may be able to move closer to the ecosystem composition and structure, and the resulting habitat heterogeneity, essential for fish and wildlife.

Historically, disturbance and successional processes were key drivers for the creation of aquatic habitats (Reeves et al. 1995). Now and into the future, both natural and anthropogenic disturbances will affect the creation, maintenance, destruction, and recreation of aquatic habitats. Management may most reliably result in high quality habitat when it emulates historical disturbances and their effects on a watershed (Poff et al. 1997). An idea offered by Naiman et al. (2000) is to base management on historical patterns of watershed conditions and natural disturbances. If flooding was a major natural disturbance in a watershed, then with empirical data and/or models on the extent to which flooding has affected the watershed, one could describe the dynamic equilibrium conditions of channels and floodplains over time, and then tailor riparian management to the unique conditions of that watershed. If wildfires followed by landslides were the historical disturbance pattern in a watershed, then watershed-scale, long-term forest management plans might schedule timber harvests such that historical natural patterns are partially emulated (Reeves et al. 1995; Bisson et al. 2009). Emulating flood or wildlife disturbances for the benefit of salmon and other aquatic species will be a much more complicated project in residential (i.e., rural, suburban, urban) areas.

The importance of riparian ecosystems in maintaining channel, off-channel, and floodplain habitats is increasingly well supported by the scientific literature. In particular, the importance of longitudinal, lateral, and vertical connectivity to the quality of habitat conditions and the importance of riparian vegetation to stream channel stability are increasingly emphasized. Management of riparian ecosystems should consider connectivity among the geomorphic process domains, the influences of natural disturbance, the historical range of natural variability, and the inextricable influence that riparian vegetation has on geomorphic processes.



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School of Bull Trout Salvelinus confluentus/*William Meyer, WDFW*

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Chapter 3. Wood

By: George F. Wilhere and Anne Marshall

3.1. Introduction

The scientific study of wood in rivers and streams began about 50 years ago (Gregory 2003) and the vital ecological role of instream wood has been known for at least 40 years (Swanson et al. 1976). Over that 50 year period, the substantial quantity of research on instream wood has motivated numerous authoritative reviews of the scientific literature, such as Bisson et al. (1987), Maser et al. (1988), Gurnell et al. (1995), Bilby and Bisson (1998), Gurnell et al. (2002), Naiman et al. (2002a), and Hassan et al. (2005). A comprehensive, in-depth review of the ecology of wood in aquatic ecosystems is provided by Gregory et al. (2003). Although we have a solid understanding of wood's role in aquatic ecosystems and the pathways through which wood enters and moves through a stream network, some important questions remained unanswered.



Wood, rocks, and roots – roughness elements that enhance habitat diversity by increasing hydraulic complexity/Jane Atha, WDFW

This chapter focuses on the roles and recruitment of wood in aquatic ecosystems. It does not cover stream restoration using large wood. For information on that, see Dominguez and Cederholm (2000), Reich et al. (2003), Bisson et al. (2003), Carah et al. (2014), and Roni et al. (2014). For information on riparian forest management see Boyer et al. (2003) and Spies et al. (2013).

3.2. The Ecological Role of Instream Wood

Wood plays critical roles in the composition, structure, and function of riparian and aquatic ecosystems. In forested regions, wood is an important determinant of channel form and dynamics, especially in small streams (Montgomery and Buffington 1997; Bilby and Bisson 1998). However, the importance of wood's effects differs with channel dimensions, slope, sediment supply, and stream discharge (Gurnell et al. 1995). Large wood causes widening and narrowing, deepening and shallowing, stabilization and destabilization at different points along a stream or river channel (Swanson et al. 1976). The many effects of large wood create a variety of channel morphologies–dam pools, plunge pools, riffles, glides, undercut banks, and side channels–which provide a diversity of aquatic habitats. Pools are deposition sites for sediment and fine organic matter. Sediment is essential substrate for salmonid spawning, and stored sediments become mobilized over time to replenish downstream spawning areas.

Sediment and fine organic matter deposits are productive areas for invertebrates and are important food production sites for juvenile salmonids (Bisson et al. 1987). Pools provide rearing habitats and essential refuge from high flows for fish and other aquatic fauna. Instream large wood provides fish with cover from predators, and by increasing a water body's effective space, wood structures may increase fish densities (Bisson et al. 1987).

3.2.1. Small Wood

Wood is often divided into large and small size categories. Large wood is usually defined as having diameter greater than 4 in (10 cm) and length greater than 6 ft (≈2 m) (Bilby and Ward 1991; Schuett-Hames et al. 1999).[1] Small wood[2] consists of branches and other woody material not classified as large wood. Small wood plays essential and unique roles in lotic ecosystems. For instance, accumulations of small wood enhance a stream's retention of leaves and particulate organic matter (Gregory et al. 1991), which are vital food sources for many aquatic invertebrates. Small wood also effects channel morphology. Plunge and dammed pools are often associated with accumulations of small wood, and large wood with dense accumulations of small wood retain sediment significantly more frequently than large wood with sparse small wood accumulations (Bilby and Ward 1991).

Small wood exerts tremendous effects on hydrology and channel morphology through actions of the American Beaver *Castor canadensis* (Naiman et al. 1988). Beaver dams can store large quantities of sediment, reduce channel incision, remove excess nutrients from water, increase water retention and base flows, reduce peak flows, and by spreading flow events over longer periods, increase groundwater recharge, and increase the salmonid habitat capacity of small streams (Pollock et al. 2015). Beaver dams consist mainly of mud and small wood. Published information on small wood sizes in dams of Beaver is lacking. However, Beaver most often forage on trees ranging from 1.2 - 3.2 in (3 - 8 cm) in diameter (Collen and Gibson 2001), and a large proportion of woody stems used as food are also used in dam construction (Barnes and Mallik 1996). In Maryland, Blersch and Kangas (2014) found that 98% of sticks (i.e., small wood) in a Beaver dam were less than 4 in (10 cm) in diameter and that 46% of those sticks were probably placed in the dam by Beaver. The other 54% of sticks in the dam were due to passive capture of transported wood. For more information on the role of Beaver and Beaver dams in aquatic ecosystems, see Pollock et al. (2015).

3.2.2. Roles of Instream Large Wood

The main role of large wood in aquatic ecosystems is large roughness elements (Bisson et al. 1987) (Figure 3.1). Roughness elements are obstacles in a channel that deflect flow and change its velocity. The size, shape, and strength of large wood make it very effective at redirecting hydraulic forces and the flow of materials (Figure 3.2), such as sediment and fine organic matter. Instream large wood increases hydraulic complexity, i.e., creates a wider range of flow velocities, which causes pool formation, streambed scour, sediment deposition, and channel migration. The net result is a diversity of aquatic habitats.

[1] Large wood is also known as large woody debris (LWD) or coarse woody debris. There is no universal definition of LWD. Another definition is greater than 4 in (10 cm) in diameter and greater than 3 ft (≈1 m) in length. The system of measurement used effects the size of large wood. The definition using English units (4 in wide and 6 ft long) results in a piece of smaller volume than the definition using metric units (10 cm wide and 2 m long).
[2] Small wood is also known as small woody debris or fine woody debris

The influences of instream large wood on aquatic ecosystems are a function of wood size relative to channel size. For instance, as much as 80% of pools in small streams can be associated with wood (Montgomery et al. 1995); however, the frequency of wood-associated pools decreases with increasing stream size (Bilby and Ward 1989, 1991; Montgomery et al. 1995). The latter relationship is due to the increased capacity of larger streams to transport large wood downstream.

In low order streams, "key pieces" of large wood affect channel morphology. Key pieces are defined as large wood that is independently stable within the bankfull channel (i.e., not held or trapped by other material) and have the potential to retain other pieces of large wood (WFPB 2011). Key piece size increases as channel width increases (Table 3.1). In large rivers, wood influences channel morphology through tangled accumulations of wood known as woody debris jams.

Stable structural features can promote channel stability (Sullivan et al. 1987). In large rivers, for instance, woody debris jams contribute to floodplain stabilization by initiating the formation of mid-channel bars that eventually become forested islands (Fetherston et al. 1995; Abbe and Montgomery 1996). In small streams, persistent large wood structures trap sizable amounts of sediment thereby increasing channel stability (Figure 3.3). Of all structures capable of storing sediment (i.e., wood, boulders) in small non-fish-bearing streams of northwest Washington, 93% were composed of large wood (Grizzel and Wolff 1998). Thirty to 80% of a stream's drop in elevation can be influenced by large wood (Keller and Swanson 1979), and log steps can reduce average channel gradients by 8 to 22% (Heede 1972). Reducing channel gradient dissipates stream power which mobilizes less sediment and increases sediment storage which can subsequently increase channel stability.

Table 3.1. Minimum volume of large wood key pieces for different channel widths. Example dimensions for key piece length and diameter yield minimum volume. Diameter is measured at piece midpoint. One meter is approximately 3.3 ft.

		Example dimensions (m)	
Bankfull width (m)	Minimum volume (m^3)	Length	Diameter
0-5[a]	1	2.5	0.71
5-10[a]	2.5	7.5	0.65
10-15[a]	6	12.5	0.78
15-20[a]	9	17.5	0.81
20-30[b]	9.75	17.5	0.84
30-50[bc]	10.5	17.5	0.87
50-100[bc]	10.75	17.5	0.88

[a] WFPB (2011), [b] Fox and Bolton (2007), [c] Must have an attached root wad.

Studies where wood has been experimentally removed from streams further reveal the significant role of large wood for storing sediment. For instance, Bilby (1981) measured a 72% reduction in sediment storage following removal of large wood from 575 ft (175 m) of streambed. Beschta (1979) observed a similar effect after woody debris dams were removed from a moderate gradient headwater stream in western Oregon where 6,500 yd^3 (5,000 m^3) of sediment was lost from 820 ft (250 m) of streambed over a period of about 10 months.

Large wood can also cause transient channel instability. Keller and Swanson (1979) and Nakamura and Swanson (1993) describe stream reaches where large wood caused local erosion that increased channel width by more than 50%. In one case a woody debris jam increased channel width by 230%. These two studies also describe reaches where large wood caused lateral migration of the main channel and formation of side

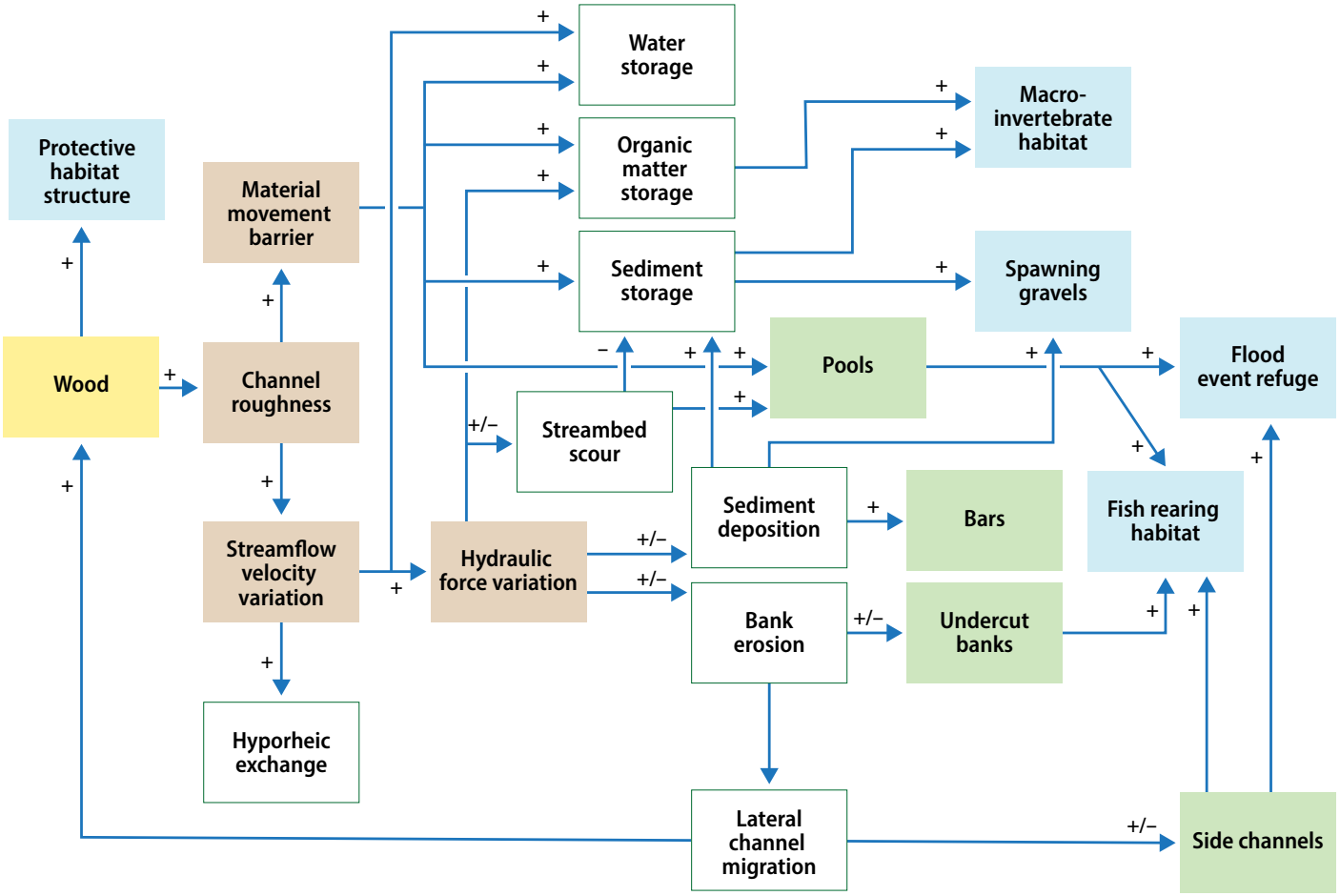


Figure 3.1. Conceptual model depicting the effects of wood on fluvial systems and fish habitats. Arrows indicate the hypothesized directions of causal relationships; pluses and minuses indicate the hypothesized slope of each relationship. Brown boxes represent direct effects of wood on fluvial processes. White boxes are secondary processes. Green boxes depict channel structures. Blue boxes are habitat features. Diagram does not include most feedback loops.

channels. Over time, these types of disturbances create a shifting mosaic of aquatic and riparian habitats.

Wood influences nutrient dynamics in two major ways: wood contains nutrients that are released through decomposition, and large wood influences the rate and timing of organic materials transport (Bilby 2003). The latter is the more important effect. Instream large wood traps and retains organic matter, such as leaves and other plant detritus, which are essential to the aquatic food web. Trapped organic materials are food sources for aquatic microorganisms, such as bacteria and certain fungi, and invertebrates, such as insects, crustaceans, and mollusks.



Figure 3.2. Sediment and nutrient storage and gravel bar formation behind large wood/Jane Atha, WDFW



Figure 3.3. Large wood altering channel morphology by creating dam pool, step drop, and plunge pool/Jane Atha, WDFW

The relationship between instream large wood and nutrient storage is well established. Larger quantities of wood per unit area in small streams lead to higher rates of storage of fine organic matter (Bilby and Likens 1980; Bilby and Bisson 1998; Brookshire and Dwire 2003). The mass of coarse particulate organic matter in streams in the McKenzie River watershed of Oregon was positively related to amounts of instream wood (Naiman and Sedell 1979). Bilby (1981) reported dramatic increases in downstream export of fine particulates during periods of high discharge following woody debris removal.

Carcasses of adult anadromous salmon provide nutrients to aquatic ecosystems (Cederholm et al. 1989; Reimchen et al. 2003). On the Olympic Peninsula, a positive correlation was observed between the number of Coho Salmon *Oncorhynchus kisutch* carcasses retained in streams and the amount of large wood in the stream (Cederholm and Peterson 1985).

By creating dams, instream large wood regulates water flow and storage. For example, surface water volume increased by 168%, five years after restoration of instream large wood in a coastal Oregon stream (Crispin et al. 1993), and third-order streams in Indiana with woody debris dams held surface water 1.5 to 1.7 times longer than those with minimal large wood (Ehrman and Lamberti 1992, cited by Gurnell et al. 1995). Hydrological effects such as these may alter high flow events by reducing peak discharge and increasing the event's duration (Gurnell et al. 1995). Pools created by woody debris dams raise the water table in adjacent streambanks (Gurnell et al. 1995), and that affects riparian vegetation composition. For instance, at some sites, wet riparian soils may be maintained through seepage from pools, and wet soils are more suitable for Red Alder *Alnus rubra,* Red Ceder *Thuja plicata,* and Alaska Yellow Ceder *Chamaecyparis nootkatensis* than other tree species. Red Alder is known to contribute enormous amounts of beneficial nitrogen to soils and streams (Naiman et al. 2002b).

The hyporheic zone is the saturated sediment beneath stream channels and riparian areas where groundwater and instream water mix. Large wood diverts surface water flow into the hyporheic zone, and by trapping and storing sediments, large wood increases the volume of the hyporheic zone (Naiman et al. 2000). Greater hyporheic exchange can also reduce a streams thermal sensitivity (Chapter 4).

3.3. Recruitment of Instream Large Wood

The quantity of instream large wood is determined by the processes of wood recruitment, decomposition, and transport (Figure 3.4). "Recruitment" refers to the process of wood moving from the terrestrial environment to the stream channel. "Transport" refers to wood import to, movement within, and export from stream reaches. For comprehensive reviews of the dynamics of instream large wood, including decomposition and transport, see Benda et al. (2003), Bilby (2003), Gurnell (2003), and Piegay (2003).

3.3.1. Wood Recruitment Mechanisms

Large wood recruitment is often caused by bank erosion, windthrow, landslides, debris flows, snow avalanches, and tree mortality due to fire, ice storms, insects, and disease (Swanson et al. 1976; Maser et al. 1988). At any given site, more than one mechanism may contribute to recruitment. However, the dominant mechanism is determined by channel morphology, slope steepness, slope stability, forest composition and structure, and local wind patterns (Murphy and Koski 1989; McDade et al. 1990; May and Gresswell 2003; Johnston et al. 2011; Benda and Bigelow 2014). In large low-gradient rivers, for instance, wood is commonly recruited via bank erosion. Steep-sloped riparian forests along confined streams can recruit instream large wood via several mechanisms; however, landslides and windthrow are the dominant recruitment mechanisms in such settings (Nakamura and Swanson 1993; May and Gresswell 2003). Fox (2001) reported that smaller channels are likely to obtain a significant proportion of instream large wood by stem breakage and individual tree mortality due to insects or disease because smaller streams recruit less wood through lateral bank avulsion. Beaver recruit small wood to small, low-gradient streams (Pollock et al. 2003).

Instream wood originating from bank erosion increases as channel confinement decreases (Murphy and Koski 1989; Nakamura and Swanson 1993; Martin and Benda 2001; Johnston et al. 2011). In relatively unconfined third-order channels surrounded by mature and old-growth forests in British Columbia, bank erosion was the dominant route of large wood delivery, especially in wider channels (Johnston et al. 2011). Along Alaska's southeastern coast, bank erosion dominated large wood recruitment in alluvial channels, while windthrow was dominant in bedrock channels (Murphy and Koski 1989). Over a 63 year period, the Queets River (bankfull width = 420 ft [128 m]) recruited 95% of wood pieces ≥ 3 ft (1 m) in diameter through bank erosion that occurred as its channel meandered across its wide floodplain (Latterell and Naiman 2007).

The relative importance of each instream wood recruitment mechanism is highly variable (Table 3.2). Johnston et al. (2011) found tree mortality was the most common recruitment mechanism followed by (in descending order) bank erosion, windthrow, and landslides. In contrast, Murphy and Koski (1989) found that tree mortality was the third most common mechanism, and their rank ordering was bank erosion, windthrow, tree mortality, and landslides. Johnston et al. (2011) found that windthrow contributed 4% of instream large wood, but May and Gresswell (2003) found windthrow contributed 59%, on average. Benda et al. (2003) found that landslides contributed, on average, 17% of instream wood volume, but at the site-level, the contribution from landslides ranged from 0 to 66%. In the Oregon Coast Range, 65% of instream pieces of large wood and 46% of wood volume in a fourth order stream were delivered by landslide or debris flow (Reeves et al. 2003).



Large wood suspended over water creates a refuge for fish from avian predators/Jane Atha, WDFW

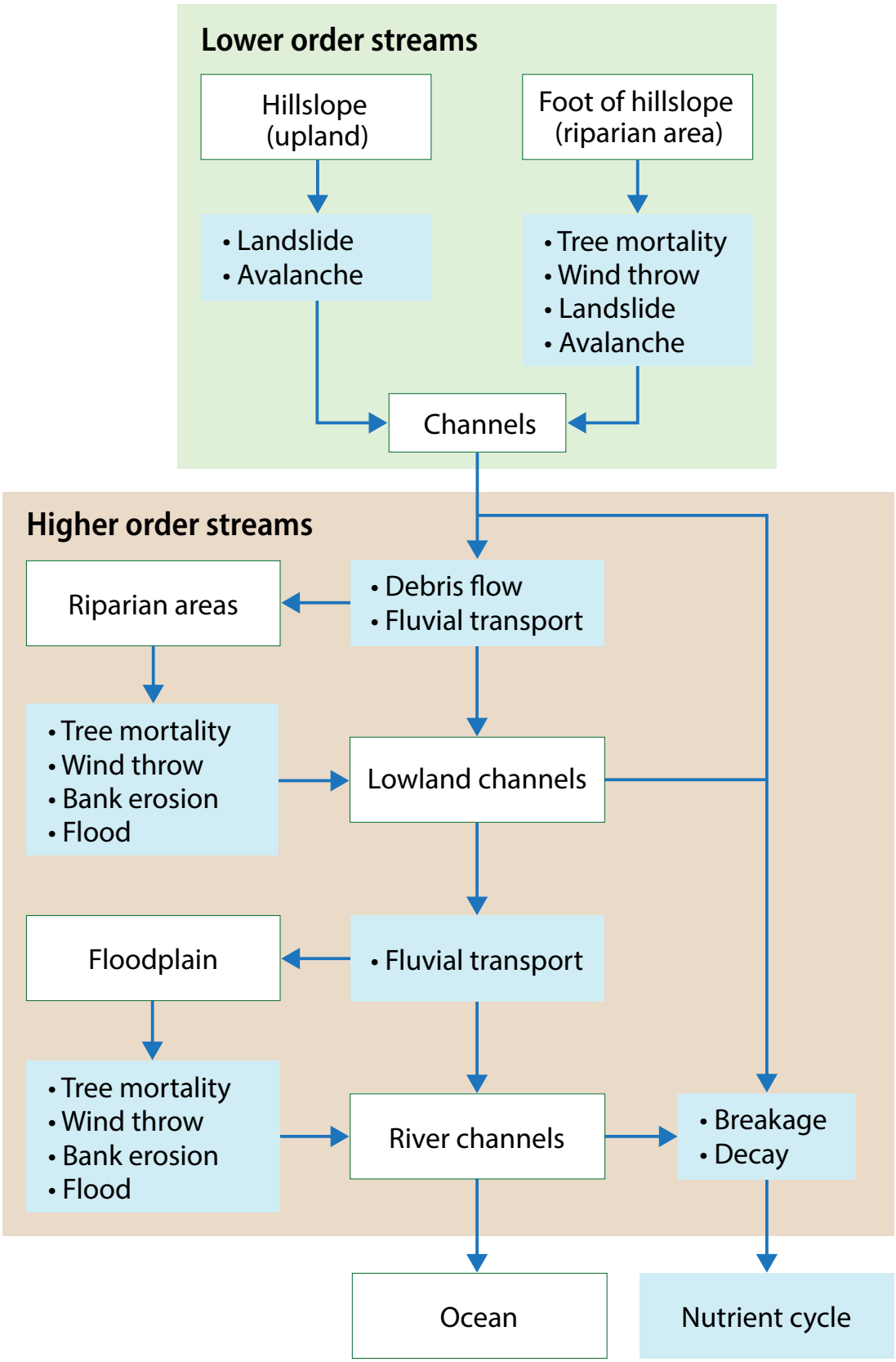


Figure 3.4. Wood recruitment mechanisms and wood transport pathways (adapted from Hassan et al. 2005). Lower order streams are first and second order headwaters. White and blue boxes are ecosystem structures and processes, respectively.

Table 3.2. Mean percentage of instream large wood contributed by various recruitment mechanisms in unmanaged old-growth conifer forests. For Johnston et al. (2011), stem breakage could be lumped with the windthrow or tree mortality categories. One meter is approximately 3.3 feet.

		Southeast Alaska[1]	South & Central British Columbia[2]	Coast Range Oregon[3]	Northern California[4]
	Stream length (m)	10,280	8,129	3,220	4,470
	Wood units	% of wood pieces	% of wood pieces	% of wood pieces	% of wood volume
Recruitment mechanism	bank erosion	42	18	6	29
	windthrow	33	4	59	--
	tree mortality	22	65	6	53
	stem break	--	12	--	--
	landslide	3	1	29	17

1 = Murphy and Koski 1989, 2 = Johnston et al. 2011, 3 = May and Gresswell 2003, 4 = Benda et al. 2003

A site's recruitment mechanisms determine the magnitude and timing of wood recruitment events. Recruitment can be continual or episodic. In large, meandering rivers wood may be recruited through continual bank erosion. Soil creep along the eroding base of a hillslope may also contribute to continual wood recruitment. However, most wood recruitment occurs through episodic events such as floods, landslides, debris flow, or windstorms. For example, if a 100-year flood causes a river to migrate across its floodplain, then a huge volume of wood that would have taken decades to be recruited under smaller flows could be recruited overnight. In smaller confined streams, the main recruitment mechanism may be windthrow, which can recruit wood incrementally (single tree per event) or catastrophically (100s of trees per event).

3.3.2. Recruitment Distances

Forests adjacent to streams provide the majority of large wood delivered to stream channels (Murphy and Koski 1989; McDade et al. 1990), however, trees far removed from riparian areas may also be delivered via landslides (Reeves et al. 2003) or channel migration (Latterell and Naiman 2007). Johnston et al. (2011) found that mean recruitment distances were greatest for wood entering by way of landslides, followed by (in descending order by distance) windthrow, stem breakage, falling of dead trees, and bank erosion.

Source distances are affected by channel geomorphology. The source distance of instream large wood differed significantly ($P < 0.05$) when comparing alluvial streams to colluvial channels draining steep hillslopes in Oregon's Coast Range (May and Gresswell 2003). In this study, 80% of wood pieces and total wood volume originated from forests within 160 ft (50 m) of colluvial channels confined by steep hillslopes, whereas in unconfined alluvial channels, 80% of instream large wood originated from within 98 ft (30 m) of the channel (May and Gresswell 2003). Along steep second growth redwood forests in northern California, landslides resulted in recruitment distances extending over 197 ft (60 m) (Benda et al. 2002). In the Oregon Coast Range, large wood from pristine steeply sloped conifer-deciduous forest was delivered to a fourth order stream by landslide or debris flow from distances of more than 295 ft (90 m) upslope of the channel (Reeves et al. 2003).

Table 3.3. Recruitment distances of instream large wood from unmanaged old-growth conifer riparian forests.

Location	Stream order or width	Maximum recruitment distance	Dominant recruitment process	Recruitment from intermediate distances	Source*
Southeast Alaska	second- to fifth-order	> 100 ft > 30 m	bank erosion	99% of pieces from < 100 ft (30 m). 45% of pieces from within 3 ft (1 m) of streambank. Average tree height = 130 ft (40 m)‡.	1
Western Oregon & Washington	first- to third-order	180 ft 55 m	not reported	50% of pieces from within 33 ft (10 m) of streambank; 85% from within 100 ft (30 m); 90% from within 128 ft (39 m), horizontal distance. Average tree height = 189 ft (57.6 m).	2
Northern California	45-55 ft 14-17 m	180 ft 55 m	variable	90% of wood from < 100 ft (30 m), slope distance. Longer recruitment distances due to landsliding.	3
Coast Range Oregon	second- and third-order	230 < d < 262 ft 70 < d < 80 m	windthrow	In alluvial stream 80% of pieces from ≤ 100 ft (30 m). In colluvial streams ≈50% of pieces from ≤ 100 ft (30 m). For both types ≈75% of volume from ≤ 165 ft (50 m).	4
Coast Range Oregon	fourth-order	> 300 ft > 90 m	landslide & debris flow	About 65% of pieces and 46% of wood volume were from upslope sources by landslides or debris flows.	5
Olympic Peninsula	sixth-order	> 1,475 ft > 450 m	channel migration	95% of wood from < 870 ft (265 m). 50% of pieces from within 300 ft (92 m).	6
Southeast Alaska	16-94 ft 5-30 m	115 < d < 130 ft 35 < d < 40 m	variable	96% of all large wood from within 65 ft (20 m) and 89% of from within 33 ft (10 m). Average tree height = 74 ft (22.6 m).	7
South & Central British Columbia	3-55 ft 1-17 m	425 ft 65 m	tree mortality	90% of large wood pieces and volume delivered to stream channels from within 33 and 30 ft (10 and 9 m), respectively. Average tree height = 120 ft (37 m).	8

* 1 = Murphy and Koski 1989, 2 = McDade et al. 1990, 3 = Benda et al. 2002; 4 = May and Gresswell 2003; 5 = Reeves et al. 2003, 6 - Latterell and Naiman 2007, 7 - Martin and Grotefendt 2007, 8 - Johnston et al. 2011.

‡ Tree height from Spence et al. (1996).

Source distances are affected by tree size. In one study, source distances for approximately 90% of instream large wood from mature and old-growth conifer riparian forest in western Washington and Oregon were within 85 and 130 ft (26 m and 40 m) of the streambank, respectively (McDade et al. 1990). The difference in source distances was largely attributed to taller trees in old-growth riparian forest (mean height = 189 ft [58 m]) compared to trees in mature riparian forest (mean height = 157 ft [48 m]). Likewise, recruitment distances measured in Alaska (e.g., Murphy and Koski 1989; Martin and Grotefendt 2007) are generally shorter than those measured in Oregon (e.g., McDade et al. 1990; May and Gresswell 2003) because trees of the same species are generally shorter in Alaska than in Oregon (Table 3.3). Johnston et al. (2011) also found that large wood source distances increased with increasing tree height. For a more thorough discussion of factors affecting source distances see Benda and Bigelow (2014).

The stereotypic recruitment function describing the amount of instream wood versus recruitment distance is nonlinear (Figure 3.5). That is, areas closer to the

stream channel provide relatively more wood than areas farther from the stream channel. In southeast Alaska, for instance, 100% of large wood was recruited from within 98 ft (30 m) of the streambank, but 45% of large wood originated from within 3.3 ft (1 m) (Murphy and Koski 1989). Likewise, in a study from Oregon and Washington, 100% of large wood with an identified source was recruited from within 180 ft (55 m), but 50% of large wood with an identified source originated from 33 ft (10 m; McDade et al. 1990) (Table 3.3). The shape of the wood recruitment function, and in particular, the shape under different watershed and site-level conditions, is an important question for riparian forest management.

Although most wood is recruited from areas close to a stream (Table 3.2), areas farther from a stream cannot be discounted, especially along larger alluvial streams. Along a fourth order stream in Oregon, the sources for 65% of large wood originated on hillslopes prone to landslides and lay beyond 295 ft (90 m) from the stream channel (Reeves et al. 2003). In Washington, 50% of large wood in a fifth-order river was recruited by lateral channel migration from forests on floodplains and fluvial terraces that lay beyond 300 ft (92 m) from the riverbank (Latterell and Naiman 2007).

3.3.3. Wood Recruitment in Intensively Managed Forests

An important question for riparian area management is how does wood recruitment in second-growth or intensively managed forests differ from recruitment in unmanaged, "natural" riparian forests? The answer to this question is essential for understanding the effects of contemporary forest management on fish habitats, however, useful answers are difficult to obtain because forest practices today are much different from those of the past.

The current conditions of instream wood and riparian areas in second-growth forests are the result of past management, and over the past 100 years management practices have changed dramatically. In the early 20th century splash dams were built on small streams to sluice logs downstream (Bisson et al. 1987), a practice that flushed naturally occurring large wood from the channel. During the 1950s and 1960s wood was routinely removed from streams to "improve" fish passage (Sedell et al. 1988), and this practice continued until the 1980s (Bilby 1984). Until the 1970s, logging to the streambank was common in Oregon

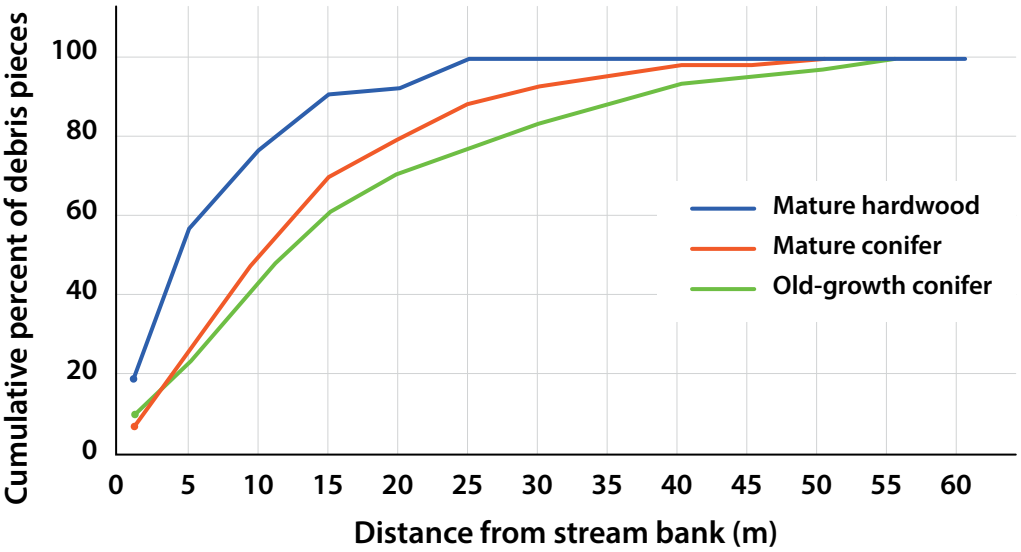


Figure 3.5. Distribution of source distances from tree origin to streambank. Empirically derived curves for old-growth conifer, mature conifer, and mature hardwood stands in western Oregon and Washington (from McDade et al. 1990). Empirically derived curves based on large wood with an identified source. One meter is equivalent to 3.3 feet.

and Washington; a practice that changed shortly after passage of the Clean Water Act of 1972. From 1987 to 2000, the Washington Forest Practices Rules required 23 to 65 trees per acre in riparian areas (WFPB 1987). In contrast, old-growth riparian areas may have 160 or more trees per acre (Acker et al. 2003). The current forest practices rule (WDNR 2005) require much wider stream-side buffers with much higher tree densities in riparian areas than pervious rules. The current regulations should result in a stand basal area equal to that of a mature conifer forest when the riparian stand is 140 years old. In short, over the past 100 years, riparian areas in intensively managed forests of Washington have been subjected to many different types of management, and over the next 100 years these same riparian areas will change dramatically.

Past forest practices are known to have severely degraded instream wood (Bilby and Ward 1991; Ralph et al. 1994), but current forest practice regulations are expected to improve instream wood (WDNR 2005). Whether current regulations will result in enough instream wood to create fish habitats that meet policy goals is unknown, and resolving that issue will be difficult until riparian areas attain their desired future conditions a century or more from now. Nevertheless, theoretical and empirical evidence suggest two main differences in large wood recruitment between second-growth, intensively managed forests and unmanaged mature and old-growth riparian forests.

Past forest practices are known to have severely degraded instream wood, but current forest practice regulations are expected to improve instream wood. Whether current regulations will result in enough instream wood to create fish habitats that meet policy goals is unknown.

First, the size of wood recruited from intensively managed forests is smaller than wood recruited from old-growth forests. Benda et al. (2002) found that the diameter of wood recruited from old-growth sites was, on average, up to twice the diameter of wood found in 50-year-old second-growth sites. Czarnomski et al. (2008) found significantly higher numbers of large wood pieces in stream segments adjacent to unmanaged mature and old-growth sites than in segments adjacent to 30- to 50-year-old intensively managed sites. From a theoretical perspective, these results are unsurprising—the dominant trees in a 200-year-old stand are much larger than the dominant trees in a 50-year-old stand. A similar relationship was also reported by McDade at al. (1990) who found that the size, both length and diameter, of instream large wood was related to forest age—wood was significantly smaller in younger forests (i.e., unmanaged mature forest versus old-growth forest).

Second, both theoretical models and empirical evidence show that maximum wood recruitment distances for intensively managed forest are less than the maximum recruitment distance for old-growth forests (McDade at al. 1990; Robison and Beschta 1990; Benda and Bigelow 2014). Again, these results are due to relative tree sizes—taller trees can contribute large wood from longer distances. The models show that the maximum recruitment distance for large wood is slightly less than the height of dominant trees; however, these models do not incorporate the recruitment processes of landslides and lateral channel migration which could substantially lengthen the maximum recruitment distance. For instance, in Benda et al. (2002) the theoretical maximum recruitment distance for their sixteen 50-year-old second-growth sites was about 98 ft (30 m), but due to landslides two sites had large wood recruited from beyond that distance—105 ft (32 m) and 210 ft (65 m). The results of Benda et al. (2002) and Benda and



Bank erosion recruits large wood into stream/Ned Pittman, WDFW

Bigelow (2014) also show that regardless of stand age or management, recruitment distances are primarily determined by recruitment processes. Riparian areas where bank erosion is the dominant process will, on average, have shorter recruitment distances, riparian areas where landslides dominate will have longer recruitment distances, and areas where other forms of tree mortality (e.g., windthrow, suppression, disease) dominate will have intermediate recruitment distances. In short, spatial variability in large wood recruitment is a function of many factors, including stream size and channel morphology, forest management, and natural disturbances such as landslides, floods, and windthrow.

3.4. Abundance of Instream Wood

3.4.1. Forested Regions of Washington

The abundance of instream large wood was much greater historically than it is today, especially in large rivers. One hundred fifty years ago, some woody debris jams on large rivers were nearly 1-mile-long (Sedell and Luchessa 1981), but

these impressive natural structures were cleared for purposes of river navigation. For instance, during the latter part of the 19th century, over 5,500 pieces of wood between 5 and 9 ft (1.5 and 2.7 m) in diameter were pulled from a 50-mile (80-km) section of the Willamette River (Sedell and Luchessa 1981). Collins et al. (2002) estimated that wood in some lowland Puget Sound rivers was 10 to 100 times greater prior to European settlement.

In contrast to large rivers, the abundance of large wood in small streams of unmanaged watersheds may still be representative of historical conditions. Fox and Bolton (2007) studied the quantities of instream large wood in natural, unmanaged forested watersheds in Washington. Ninety-six percent of their 150 sites had a stand age between 200 and 800 years (Fox 2001). In these watersheds, the processes of recruitment, decomposition, and transport were presumably undisturbed by human activities. Their findings, which are presented for forest zones and channel widths, could serve as reference or target conditions for instream large wood (Table 3.4).

3.4.2. Non-forested Regions of Washington

Fox and Bolton (2007) studied forested watersheds in forested regions (sensu Franklin and Dryness 1988), and, in fact, nearly all we know about instream wood is based on studies conducted in forested watersheds. This is unfortunate because our knowledge of instream wood for non-forested regions of Washington, such as semi-arid grasslands (i.e., steppe or Palouse) and shrub-steppe, is limited. Nevertheless, instream wood was likely to have been more abundant than it is today for two reasons.

First, in basins with headwaters in forested regions, such as the Yakima, Wenatchee, and Walla Walla basins, wood was transported downstream to shrub-steppe and grassland streams. This process is known to have occurred in other semi-arid and arid regions of the United States. Minckley and Rinne (1985) present historical evidence for the movement of large wood in rivers of the desert southwest: wood originated in forested headwaters, moved sporadically through desert riparian areas during flood events, and was ultimately deposited at the mouth of the Colorado River in Mexico. Minckley and Rinne (1985) identify interception of large wood by dams as a major cause of large wood reduction in semi-arid and arid river basins. At artificial reservoirs in eastern Washington, such as Keechelus, Kachess, Cle Elum, Bumping, Clear, and Rimrock lakes, large wood that could potentially interfere with dam operations is removed and burned (W. Meyer and B. Renfrow, Washington Department of Fish and Wildlife, personal communications). Some small water diversion dams do the same with large wood. This practice diminishes the quantity and quality of fish habitat in the Yakima and Tieton rivers, especially in their semi-arid shrub-steppe sections.

Second, riparian areas in grassland and shrub-steppe regions are inhabited by a wide variety of woody plants—Black Cottonwood *Populus balsamorhiza*, Quaking Aspen *Populus tremuloides*, White Alder *Alnus rhombifolia*, Thinleaf Alder *Alnus incana*, Water Birch *Betula occidentalis*, Black Hawthorne *Crataegus douglasii*, and Yellow Willow *Salix lutea* (Crawford 2003), and the historical abundance of woody plants in riparian areas is thought to have been much greater than it is today (Wissmar et al. 1994; Kauffman et al. 1997; Wissmar 2004). Reductions in woody plant abundance are mainly due to hydrological changes caused by water diversions for irrigation (Jamieson and Braatne 2001) and livestock grazing. Restoration projects can indicate the density of woody plants that historically existed in riparian areas prior to intensive livestock grazing. Only two years after the cessation of grazing within riparian areas in northeastern Oregon, the mean crown volume of willows and Thinleaf Alder tripled in size and that of Black Cottonwood increased 9-fold (Case and Kauffman

1997). Furthermore, shrub density increased by 50%. One possible reason for the severe impacts of grazing is that riparian vegetation in the semi-arid grassland and shrub-steppe regions of Washington evolved with little grazing by large herbivores (Mack and Thompson 1982).

With the exception of Black Cottonwood, woody plants in grassland and shrub-steppe regions do not contribute key pieces of large wood to stream channels (Table 3.1). Historically, much wood in stream channels of semi-arid regions was likely to have been small wood, and much of that small wood may have been recruited to and stored in the channel through Beaver activity. Prior to 1864, Beaver are known to have been abundant in the shrub-steppe region of central Oregon, and the eradication of Beaver from central Oregon is thought to have caused a cascade of effects: gradual disintegration of Beaver dams led to incision of streambeds, lowering of water

Table 3.4. Distributions of large wood per 100 m of stream channel by forest regions in Washington State and by bankfull width (BFW) class (Fox and Bolton 2007). Large wood was defined as pieces exceeding 10 cm (4 in) in diameter and 2 m (≈6 ft) in length. Key piece sizes are defined in Table 3.1. One meter is approximately 3.3 feet.

Forest zones	BFW Class (m)	75th Percentile	Median	25th Percentile
		Number of pieces per 100 m		
Sitka Spruce *Picea sitchensis*, Western Hemlock *Tsuga heterophylla*, Silver Fir *Abies alba*, and Mountain Hemlock *T. mertensiana*	0-6	> 38	29	< 26
	> 6-30	> 63	52	< 29
	> 30-100	> 208	106	< 57
Subalpine Fir *Abies lasiocarpa* and Grand Fir *A. grandis*	0-3	> 28	22	< 15
	> 3-30	> 56	35	< 25
	> 30-50	> 63	34	< 22
Douglas-fir *Pseudotsuga menziesii* and Ponderosa Pine *Pinus ponderosa*	0-6	> 29	15	< 5
	> 6-30	> 35	17	< 5
		Number of key pieces per 100 m		
Sitka Spruce, Western Hemlock, Silver Fir, and Mountain Hemlock	0-30	> 11	6	< 4
	> 30-100	> 4	1.3	< 1
Subalpine Fir and Grand Fir	0-15	> 4	2	< 0.5
	>15-50	> 1	0.3	< 0.5
Douglas-fir and Ponderosa Pine	0-30	> 2	0.4	< 0.5
		Volume (m^3) per 100 m		
Sitka Spruce, Western Hemlock, Silver Fir, and Mountain Hemlock	0-30	> 99	51	< 28
	> 30-100	> 317	93	< 44
Subalpine Fir and Grand Fir	0-3	> 10	8	< 3
	> 3-50	> 30	18	< 11
Douglas-fir and Ponderosa Pine	0-30	> 15	7	< 2



Wood jams are habitat features and are less common now than they were historically/Ned Pittman, WDFW

tables, loss of riparian vegetation, and subsequently deeper incision of channels (Buckley 1993). According to Pollock et al. (2007), the exact mechanism that caused widespread incision of streambeds remains uncertain, however, incision almost invariably coincided with widespread trapping of Beaver and the onset of intensive livestock grazing.

For the semi-arid grassland and shrub-steppe regions of Washington, we currently lack data with which to describe reference conditions for instream wood and for riparian plant communities. Historical reconstruction using General Land Office survey notes and historical photos is one way to develop qualitative descriptions of riparian plant communities (McAllister 2008); however, more quantitative descriptions would benefit development of management objectives. Much remains unknown about historical conditions of riparian areas in non-forested regions.

3.5. Fish, Wildlife, and Instream Wood

Authoritative reviews of the scientific literature regarding relationships between instream wood and fish or wildlife species have been written by Bisson et al. (1987), Benke and Wallace (2003), Dolloff and Warren (2003), Zalewski et al. (2003), Steel et al. (2003), and Wondzell and Bisson (2003). Certain small mammal and bird species are known to be associated with wood in stream channels (Steel et al. 2003). However, we discuss only fish, amphibians, reptiles, and invertebrates; taxonomic groups known to have strong associations with instream wood.

3.5.1. Fish

For salmonids, especially juvenile Coho Salmon, there is no more important structural component than instream wood (Bisson et al. 1987). In Puget Sound lowland streams, measures of salmonid rearing habitat were strongly linked to instream large wood abundance (May et al. 1997). In headwater streams, step pools formed by large wood were important for Dolly Varden *Salvelinus malma,* juvenile Coho Salmon, steelhead, and Cutthroat Trout *Oncorhynchus clarkii* in reaches with gradients less than 4% to greater than 10% (Bryant et al. 2007). Adult spawning Sockeye Salmon *Oncorhynchus nerka* densities were positively correlated with cover provided by large wood and undercut banks, pool area, and large wood (Braun and Reynolds 2011). The instream abundance of juvenile salmonids often is directly related to the amount of large wood (Murphy et al. 1986; Bisson et al. 1987). Stream reaches where large wood was artificially added were used by higher densities of juvenile Coho Salmon in summer and winter, and Cutthroat Trout and steelhead in winter in 30 western Oregon and Washington streams when compared to reaches where large wood was not enhanced (Roni and Quinn 2001). Spawning Coho Salmon abundance increased after instream wood structures were restored (Crispin et al. 1993). A study in British Columbia found that the biomass of yearling and older salmonids was positively correlated with stream pool volume (R^2 = 0.92) and that over 70% of pool volume was formed by large wood (Fausch and Northcote 1992).

Large wood provides both direct and indirect benefits to fish (Bisson et al. 1987). Indirect benefits are related to wood's role as a roughness element, and this role is especially obvious in smaller streams where wood

can bridge much of a channel (Zalewski et al. 2003). Large wood within a small channel dissipates flow velocity, which reduces the energy fish expend as they move upstream (Zalewski et al. 2003). Bisson et al. (1987) state that sediment storage by large wood benefits fish primarily by buffering the stream network against rapid changes in sediment load that would degrade habitats, such as rapid sediment increases due to landslides. Wood also benefits fish by increasing habitat diversity. In seeking a path around large wood obstructions, water creates complex hydraulic patterns that carve pools and side channels, form falls, and enhance channel sinuosity, imposing numerous variations in a stream's hydrology and geomorphology. Another indirect benefit of instream large wood is its influences on the availability of prey for fish in the form of macroinvertebrates. Large wood provides habitat for invertebrates, which then supplies fish with a source of food (Bisson et al. 1987).

The direct benefits of instream large wood to fish are also important. Large pieces of instream wood provide fish with refuge from high velocity flows during floods and provide hiding cover from predators (Sedell et al. 1985; Bisson et al. 1987; Braun and Reynolds 2011). Upturned tree roots and logs were the most common type of cover used by juvenile Coho Salmon and steelhead in an unlogged, west coast Vancouver Island stream (Bustard and Narver 1975). The deep pools often formed around these features made for good cover, particularly for older juveniles (Bustard and Narver 1975). After logging, almost all Coho Salmon that remained in channels over the winter sheltered in stream segments jammed with logs, with undercut banks, and in pools filled with upturned tree roots and other forest debris (Tschaplinski and Harman 1983). Hartman (1965) also found overwintering Coho Salmon fry preferring cover near logs, roots, and banks in streams in coastal British Columbia. Large wood increases fish density by visually isolating individual fish, which reduces inter- and intra-species competition (Dolloff and Reeves 1990; Crook and Robertson 1999).

3.5.2. Amphibians and Reptiles

Amphibians can be a dominant biotic component in Pacific Northwest streams (Olson et al. 2007), but in contrast to fishes and invertebrates, studies that characterize the importance of instream large wood for amphibians are sparse (Wondzell and Bisson 2003). However, diverse sources of data on stream-associated amphibian species life histories indicate that instream wood contributes to the creation and maintenance of breeding, rearing, and foraging habitats, and likely overwintering habitats as well. In particular, large wood can serve as the instream substrate for amphibian oviposition (Henry and Twitty 1940; Jones et al. 1990). Wood also forms steps in streams that promote sediment wedges (May and Gresswell 2003) that serve as variable but often extensive habitat matrices for oviposition and rearing (Nussbaum 1969; Wilkins and Peterson 2000). Moreover, wood-formed steps often create dam and plunge pools that are important for amphibian foraging or refuge (Wilkins and Peterson 2000; Welsh and Lind 2002). The basis of the former is that many aquatic invertebrates eaten by stream-associated amphibians occur in the habitat matrices created by wood-formed steps (Parker 1994; Steele and Brammer 2006; see next section). In coastal Washington headwater streams, the density of stream-associated amphibians



Van Dyke's Salamander Plethodon vandykei *use large wood for cover/ Eric Lund, WDFW*

was positively correlated with the amount of functional large wood (R^2 = 0.50), and torrent salamander (family Rhyacotritonidae) densities were positively correlated with the percentage of pools, indicating the importance of habitat complexity that large wood creates (Jackson et al. 2007). In Olympic National Park, large wood was a significant variable in explaining the densities of all three stream-associated amphibian species that were present, but its relative importance varied between species and was less important than one or more of aspect, gradient, and substrate in habitat use models for tailed frogs (family Ascaphidae) and torrent salamanders (Adams and Bury 2002).

Instream large wood is especially important for one Pacific Northwest reptile order: turtles. In the Northwest, water temperatures, even in the lowland stillwater habitats in which our two native turtle species occur, is often limiting (Holland 1994). Hence, the ability to bask securely (i.e., in a relatively predator-free environment) at temperatures that exceed those of water is critical to the normal processes of digestion and for female turtles, successfully yolking up eggs. Large floating or anchored-downed logs with enough area extending above the water surface are the key structures on which basking can occur (Holland 1994). Such structures are especially important in stillwater side- and off-channel habitats of large streams.

3.5.3. Aquatic Invertebrates

The distribution and abundance of aquatic invertebrates are influenced by instream wood and certain taxa are dependent on instream wood. In streams of all sizes, areas of wood accumulation are often also invertebrate biodiversity hot spots (Benke and Wallace 2003; Wondzell and Bisson 2003). Many aquatic invertebrates use the numerous grooves, splits, and fissures in large wood as refuges from predators and harsh environments. Other invertebrate uses of wood include



Large wood in Deschutes River/Noll Steinweg, WDFW

oviposition, case making, and emergence, especially when submerged pieces are decayed rather than firm (Harmon et al. 1986). Several families of caddisfly use wood for case construction. Of ninety-two case-making caddisfly genera reviewed by Wiggins (1977), roughly a quarter exploit bark or wood to varying degrees for case construction. Instream wood also is used as sites for oviposition above and below the water line. Many caddisflies in the family Limnephilidae deposit their egg masses on moist wood. In the Coast Range of Oregon, Wisseman and Anderson (1984) found oviposition by a number of caddisfly taxa on overhanging logs. The surfaces of instream wood also are used as nursery areas for early instars, and for resting, molting, and pupation (Anderson et al. 1978).

Large wood is especially important as substrate for invertebrates to attach to in rivers with limited sources of stable substrate (Benke and Wallace 2003). Trees that have fallen into the main channels of low-gradient rivers frequently are the only stable habitat (Benke and Wallace 2003). In these streams, wood can be especially important for periphyton and macroinvertebrate taxa to attach themselves (Benke and Wallace 2003). In contrast to smaller rivers, instream large wood shifts to channel margins and floodplains of larger rivers (Bisson et al. 1987), and hence, in these main-stem locations invertebrate densities peak (Ward et al. 1982). In headwater streams, large wood and gravel habitats supported higher densities and biomass of benthic invertebrates than cobble habitats (Hernandez et al. 2005). Coe et al. (2009) saw significantly higher densities of invertebrates in Pacific Northwest streams where engineered logjams were added. They attributed this to increased overall habitat surface area, and thereby the potential for increased productivity relative to reaches with low levels of wood. Instream large wood also supported a richer and more diverse invertebrate fauna than either cobble or gravel substrates.

Wood provides invertebrates with access to a wide variety of food sources. Large wood traps and stores



Large wood on Cedar River/Hal Beecher, WDFW

organic matter, and wood can be directly consumed by some invertebrates (Benke and Wallace 2003). Trapped organic materials are food sources for bacteria, fungi, mollusks, insects, and crustaceans. Although only a small fraction of aquatic insect taxa exploit woody debris as a source of food (Harmon et al. 1986), direct wood consumption by aquatic invertebrates in the Pacific Northwest has been observed in some species of caddisfly, mayfly, beetles, and snails (Anderson et al. 1978; Dudley and Anderson 1982; Pereira and Anderson 1982; Pereira et al. 1982). Submerged large wood may also support surface films of micro-organisms (e.g., diatoms, bacteria, fungi) that efficiently take up instream nitrogen and form a food web base for aquatic invertebrates (Dudley and Anderson 1982; Johnson et al. 2003), that in turn support vertebrate species (Ashkenas et al. 2004). By moderating pulses of fine sediment (Entrekin et al. 2009), instream large wood also acts to reduce the accumulation of sediment on algae (Richardson 2008), which is an important food to many macroinvertebrate taxa.

3.5.4. Fish and Wildlife Summary

The vital ecological role of instream wood has been known for at least 40 years (Swanson et al. 1976). Relationships between high quality salmonid habitats and instream large wood are well established (Bisson et al. 1987; Dollof and Warren 2003). Invertebrate taxa,

such as aquatic insects, are also known to rely on large wood as a habitat substrate and food source. Juvenile salmonids prey on aquatic insects. Amphibians and turtles also depend on the channel morphology and wood structure created by instream large wood.

3.6. Land Use Effects

The major human land uses in Washington–urban/suburban, agriculture, and forestry–have altered or removed extensive areas of riparian forest and have adversely impacted instream wood size, abundance, and distribution, and left many streams with a chronic deficiency of instream large wood compared to historical conditions (Maser et al. 1988; Bilby and Ward 1991; Stouder et al. 1997; May et al. 1997).

In general, the three major land uses impact instream large wood in similar ways–they diminish the amount of instream wood by reducing the number and size of trees in riparian areas. Furthermore, large wood is often purposefully removed from rivers and streams because it can block culverts or damage other human-made structures such as bridges, dams, or levees; cause streambank erosion that destroys private property; and present hazards to navigation or recreation. Culverts and dams also disrupt the transport of wood through a stream network and reduce the amount of wood in higher order streams and rivers.



Juvenile fish use large wood for shelter/WDFW

Most research on instream wood and riparian forests has occurred in unmanaged and managed forests, but much of the knowledge gained in forests–such as the functions of instream wood, natural amounts of instream wood, and recruitment mechanisms–is applicable to riparian areas in urban/suburban and agricultural settings as well, especially in forested ecoregions.

3.6.1. Forestry

Because mature conifer trees in the Pacific Northwest have large-diameter, decay-resistant boles, streams in this region have naturally high volumes of large wood compared to other parts of North America (Harmon et al. 1986). Nevertheless, harvest in and around riparian areas can result in immediate and long-term changes to the volume of instream wood. Czarnomski et al. (2008) found that instream wood volume and abundance varied significantly relative to timber harvest and adjacent tree stand age. They found instream wood volume and abundance were significantly higher in streams adjacent to unmanaged, mature and old-growth stands compared to streams along 30- to 50-year-old plantations, and significantly less in streams adjacent to 30- to 50-year-old plantations compared to those adjacent to 20- to 30-year-old plantations or mature and old-growth forest. Beechie et al. (2000) estimated that if a riparian buffer was established today in a 50-year-old stand of Douglas-fir, recovery of pool-forming large wood might take less than 100 years in small channels (e.g., ≤ 66 ft [20 m] wide), but could take as much as 200 years in larger channels.

The impacts of logging on instream large wood and aquatic habitats may not be realized for many decades after logging. In interior British Columbia, Chen et al. (2005) found that in the short term, instream large wood volume and biomass increased after logging. However, they concluded that in the long term, abundance of instream large wood may be greatly reduced as a

result of increased rates of decay, transport, and reduced recruitment from the adjacent riparian forest. With instream wood residence times averaging about 30 years, Hyatt and Naiman (2001) estimated that harvesting large riparian conifers would adversely impact aquatic habitats of large streams in about three to five decades. Murphy and Koski (1989) showed a 70% reduction of instream large wood 90 years after clearcutting without a riparian buffer. They also estimated a 250-year recovery time to pre-harvest levels.



Harvest near riparian areas can impact aquatic habitats/Marc Hayes, WDFW

The loss of riparian trees can come with long-term repercussions to functional aquatic habitat. Where riparian trees are absent, Beechie et al. (2000) predicted a lag of 7-49 and 15-91 years before pool-forming large wood could be recruited from Red Alder and Douglas-fir forests, respectively. The lag time for a given stream depends on multiple factors including channel width and the minimum size of pool-forming wood. In Alberta, instream large wood generated from stand-replacing fires was depleted within 100 years of the event but once the forests reestablished, new large wood recruitment was delayed by roughly 40 years (Powell et al. 2009).

A riparian management zone (RMZ) adjacent to logging differs in its ability to supply instream wood compared to riparian areas adjacent to unlogged uplands. On average, tree mortality was 50% greater in RMZs compared to riparian areas in unlogged landscapes, 3 to 15 years post-harvest (Martin and Grotefendt 2007). Differences in stand mortality between logged and unlogged tracts were primarily due to greater windthrow at a small proportion of RMZs in logged tracts. Additionally, downed tree recruitment from RMZ outer zones was more than double that of trees recruited in unlogged tracts. Consequently, wood recruitment increased by an average of 2 trees per 330 ft (100 m) in the buffered versus unlogged forested tracts (Martin and Grotefendt 2007).

Trees in RMZs with adjacent clear-cuts may be more susceptible to windthrow. Windthrow in RMZs (85 ft [26 m] wide on both side of streams) increased instream large wood by 34% within one to three years after logging in small streams (Grizzel and Wolff 1998). The authors of that study suggested that the RMZs adjacent to clearcuts served as a long-term source of large wood. They added that over a 10-year period, windthrow could add an average of 1.9 trees per 984 ft (300 m) of stream. Along second to fifth order streams, windthrow in RMZs was 26 times greater up to three years post-harvest compared to estimated mortality rates of trees in riparian stands in unlogged tracts (Liquori 2006). Post-harvest windthrow may reduce tree density in RMZs enough to significantly reduce competition-induced tree mortality, which in turn may lead to substantially different wood recruitment dynamics in buffers compared to unlogged forests (Liquori 2006).

3.6.2. Urban/Suburban

Very few studies have examined the impacts of development on instream large wood dynamics. In their analysis of the effects of urbanization, May et al. (1997) noted that as a basin's urbanization increased the quantity of large wood declined, as did related measures of habitat quality, namely loss of riparian forest area, reduced pool area, and decreased habitat complexity. Urban streams greater than 2% gradient and lacking large wood were found to be more susceptible to scour than less developed counterparts. Other than restoration sites where instream large wood had been replaced, high quantities of instream large wood were only found in undeveloped watersheds.

An analysis of relationships of channel characteristics, land ownership, land use, and land cover to instream large wood abundance in western Oregon showed that the most important predictor for large wood volume was land ownership, followed by stream gradient (Wing and Skaugset 2002). They also observed fewer large wood pieces in streams near rural residential areas compared to managed forests. In a study outside the Pacific Northwest, researchers in the Piedmont region of Georgia found that the absence of forest cover in catchments in suburban Atlanta corresponded to a decrease of instream large wood biomass (Roy et al. 2005).



Agricultural area in western Washington/Marlin Greene, One Earth Images

3.6.3. Agriculture

Many types of agriculture remove riparian forest, and consequently, reduce the recruitment of large wood to fish-bearing rivers and streams. Within the Nooksack River basin of northwest Washington, riparian forest along reaches accessible to anadromous fish were evaluated based on their ability to contribute instream wood large enough to form pools (Hyatt et al. 2004). Seventy-four percent of this basin's riparian forests that failed to meet this criterion were found in lowland rural-agricultural areas. In contrast, only 20% of the stands that failed to meet this threshold were in federal and commercial forestlands. This contrast is notable given that agricultural and rural areas comprised only about 22% of Nooksack basin (Hyatt et al. 2004). Similar results were observed in an analysis relating land use and land cover to instream wood abundance in western Oregon (Wing and Skaugset 2002). In this study, they found fewer pieces of large wood in streams near agricultural land uses compared to that of managed forestlands.

In shrub-steppe and grassland ecoregions of eastern Washington, livestock grazing in riparian areas significantly reduces the amount of woody vegetation. Significant reductions in woody vegetation lead to numerous adverse impacts to aquatic habitats: increased streambank erosion, increased overland flow and erosion within riparian areas, increased turbidity, reduced shade, higher water temperatures, loss of cover for fish due to reductions in overhanging vegetation and undercut banks, reduction in the amount of instream small wood, changes to channel morphology such as fewer pools, fewer meanders, and channel incision, lowering the water table, and reduction in essential nutrients derived from detritus (Belsky et al. 1999).

3.6.4. Land Use Effects Summary

Land uses that affect riparian forest also affect instream large wood. Of the three major land uses, contemporary forestry has the least effect on instream large wood. However, for all three land uses, the severity of effects depends largely on how riparian areas are managed.

3.7. Conclusions

Many effects of wood on aquatic ecosystems are well understood and not subtle, and therefore, ecologists are very confident about the critical role of wood in fish habitats. Ecologists are also confident about the role of riparian forests in supplying large wood to aquatic systems. Successful conservation of fish habitats and fish species in the forested regions of Washington depends on riparian forest management that delivers adequate wood to aquatic ecosystems. From a management perspective, the main scientific uncertainties are: 1) the shape of the wood recruitment function (e.g., Figure 3.5), especially the shape under different watershed and site-level conditions; and 2) the potential contributions from recruitment mechanisms outside the riparian forest, such as landslides, debris flows, or extreme channel migration. Addressing these uncertainties through research could lead to more ecologically effective and economically efficient management of riparian areas.

To maintain or restore 100% of a site's large wood recruitment potential, the site's composition and structure should be similar to that of an unmanaged riparian forest. Given current uncertainties, re-establishing riparian forest similar to unmanaged, mature or old-growth forests should be the most reliable way to provide instream large wood sizes and abundance that are similar to historical levels.

An important management question is: what are source distances for large wood recruitment from riparian areas to aquatic ecosystems? We know that source distances for wood in riparian areas are a function of tree height—source distances are longer for riparian forests with taller trees. We also know that tree heights for old-growth conifer forests can exceed 200 ft (60 m). In Washington State, Fox (2003) found that mean heights of canopy trees in old-growth riparian areas (i.e., stand age > 200 years old) ranged from 100 to 240 ft (30 to 73 m). Height variation among riparian areas was largely explained by forest zone and site productivity class. If large wood has a minimum diameter of 4 in (10 cm), then only that portion of a tree's stem greater than 4 in (10 cm) in diameter is large wood. From tree taper equations for Douglas-fir (Biging 1984), we know that for trees between 100 to 240 ft (30 and 73 m) tall about 15 to 3 percent of the stem is not large wood, respectively.[3] In other words, for the purpose of large wood recruitment, the "effective" tree height (*sensu* Robison and Beschta. 1990; Van Sickle and Gregory 1990) ranges from 85 to 230 ft (26 to 70 m), depending on site productivity class. Therefore, in forested ecoregions, 100% of a site's large wood recruitment potential, is located about 85 to 230 ft (26 to 70 m) from the stream channel, depending on site productivity class. These source distances only account for trees recruited via bank erosion, windthrow, or tree mortality. It does not account for large wood recruited to the stream channel through landslides or debris flows, nor does it account for recruitment through extreme channel migration in large river floodplains. In addition, this does not account for source distances of small wood. Source distances for small wood equal a full tree height from the stream channel.

Ecologists are confident about the critical role of wood in creating fish habitat and the role of riparian forests in supplying large wood to aquatic systems.

[3] Effective tree height calculations were done in Microsoft Excel with equations from Robison and Beschta (1990) and Biging (1984).

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Chapter 4. Stream Temperature

By: Kirk L. Krueger, Daniel J. Isaak, and Marc P. Hayes

4.1. Introduction

The great diversity of Washington's landscapes creates equally diverse stream thermal conditions (Figure 4.1). Broad ranges in elevation (0 -14,000 ft, 0 - 4,300 m), precipitation, stream size, topography, and other factors contribute to some streams having average summer temperatures as low as 39°F (4°C); whereas others only a few miles away may exceed 68°F (20°C). Much of that thermal heterogeneity is dictated by effectively immutable geomorphic attributes of landscapes (e.g., elevation, aspect, topographic slope), which affect the potential amount of solar radiation available at a given location (Boyd and Kasper 2003). However, the types of riparian vegetation and their condition also play important roles in determining the amount of solar radiation that reaches a stream's surface. Through management of riparian ecosystem conditions, especially vegetation, the spatiotemporal distribution of stream temperatures (i.e., thermal regime) (Boyd and Kasper 2003; Caissie 2006) can be affected, which in turn, directly and indirectly affect the survival and productivity of aquatic species (Beschta et al. 1987; McCullough 1999) including salmon.

Shade can substantially reduce the amount of direct (shortwave) solar radiation, usually the main cause of heating, that reaches a stream (Poole and Berman 2001). Indirect effects of riparian vegetation include, but are not limited to, maintenance of channel form and



Pink Salmon Oncorhynchus gorbuscha *moving upstream to spawn/Ned Pittman, WDFW*

hyporheic connectivity (Gregory et al. 1991; Stanford 1998; Poole and Berman 2001) that also affect stream temperatures (Boyd and Kasper 2003; Webb et al. 2008). Maintaining and restoring riparian ecosystem functions and the thermal regimes of aquatic systems is increasingly important in light of climate change and as land use intensifies. Land use can strongly influence the intensity, timing, duration, and geographic distributions (i.e., structure) of stream temperatures (NRC 2002).

In this chapter we briefly summarize the results of our literature review, and present a simple conceptual model that identifies components (environmental factors) and structures (relations of components) that affect stream temperatures, to facilitate understanding of potential effects of different management alternatives. We also briefly discuss considerations of the effects of riparian management on stream thermal regime within a watershed or stream network context, the sensitivity of some priority species to changes in stream thermal regime, and applications of current scientific information to riparian management for suitable thermal regimes for aquatic species. Much of the literature describing the effects of human activity on stream temperature has focused on summer maximum water temperatures. Increasingly, scientists are focusing on better understanding stream thermal regimes, which describe how the temperature of streams varies through time and throughout stream networks. This shift recognizes two important ideas: 1) fish and other aquatic organism use different stream habitats, defined in part by specific water temperature ranges, to complete their life cycle, and 2) heat energy inputs into streams are variable in space and time and heat energy is often carried downstream of the reach from which it was gained.

Our review of the scientific literature on the effects of riparian conditions on stream temperatures was extensive; including more than 6,000 articles relevant to riparian ecosystem research, of which more than 700 referenced stream temperatures and over 100 that referred to or reported measured effects of riparian ecosystem conditions on stream temperatures. Our work also identifies research to inform management recommendations that are applicable across a wide range of environmental conditions (e.g., various latitudes, topographies, and land uses). Further, we wanted to address the broad range of thermal conditions that are important to aquatic species (e.g., frequency, duration, intensity, and predictability of summer high temperatures and temperatures during incubation (Lytle and Poff 2004); and the geographic distribution of stream temperatures (Torgersen et al. 1999; Poole et al. 2001; Ebersole et al. 2003a). Therefore, we reference additional scientific information to provide the context that allows for better understanding and application of riparian ecosystem-specific information. Several reviews were particularly valuable in directing our efforts (e.g., Elmore and Kauffman 1994; May 2003; Moore et al. 2005; Sather and May 2007; Bowler et al. 2012; Czarnomski and Hale 2013).

Scientists are focusing on better understanding stream thermal regimes, which describe how the temperature of streams varies through time and throughout stream networks.

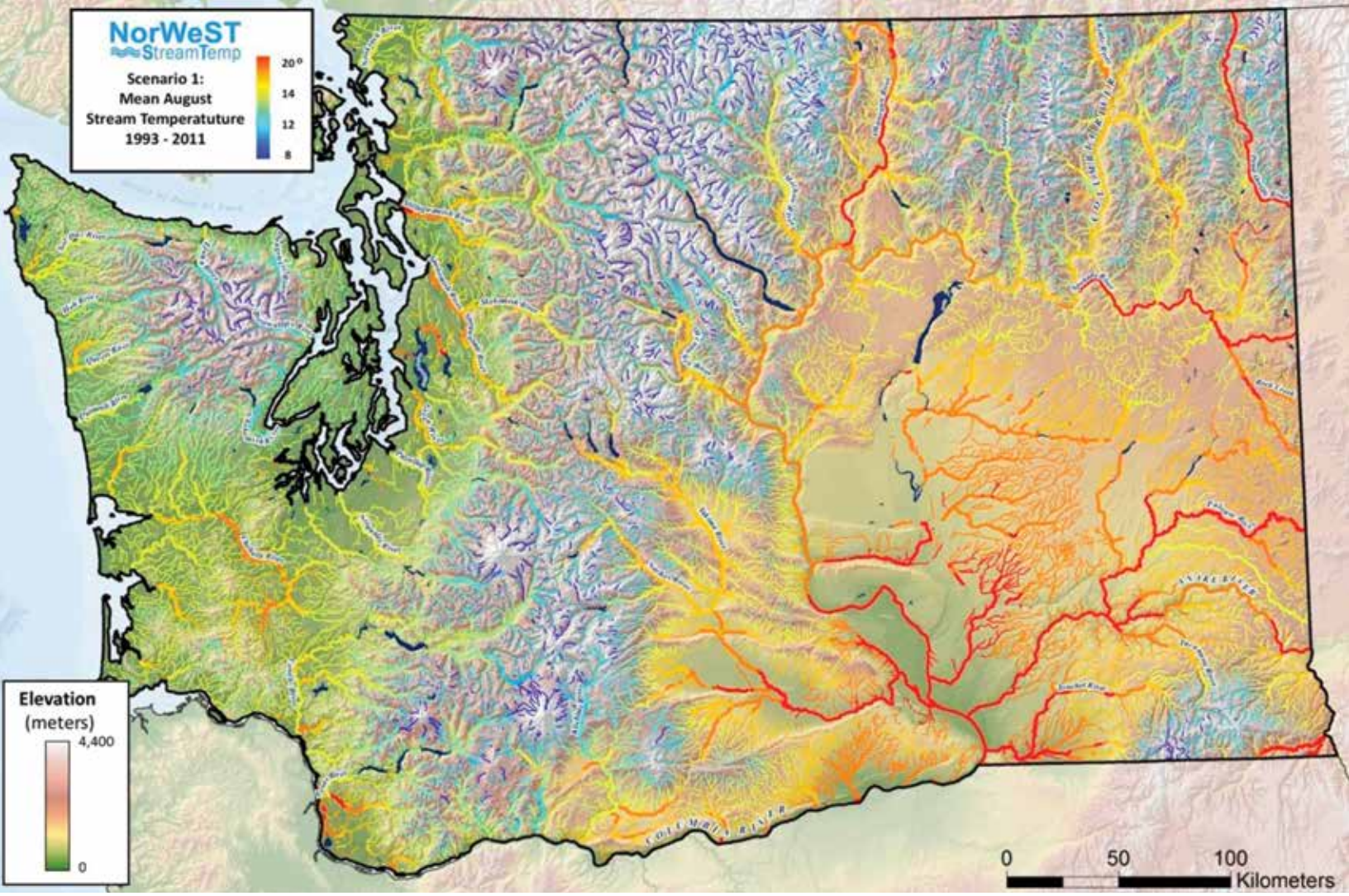


Figure 4.1. Stream thermalscape showing mean August temperatures for 66,236 kilometers (41,157 miles) of streams across Washington that was developed in the NorWeST project (poster available here: http://www.fs.fed .us/rm/boise/AWAE/projects/stream_temp/downloads/14NorWeST_WashingtonStreamTemperatureMap.pdf). Topographic and geomorphic complexity across the state creates significant thermal heterogeneity that is moderated locally by riparian conditions.

4.1.1. State of the Science

The scientific literature establishes a clear expectation that reduction of stream shade, especially due to vegetation removal, will result in warmer summer stream temperatures (e.g., Sridhar et al. 2004; Allen et al. 2007). The literature, derived primarily from descriptive (e.g., case study) and occasionally statistically predictive (e.g., generalization across many case studies) studies, demonstrates that riparian management can affect shade and in turn stream temperatures (Johnson 2004; Moore et al. 2005). The vast majority of those studies document an increase in a temperature statistic, often mean daily maximum temperature during summer, associated with a loss of shade (Johnson 2004; Moore et al. 2005; Bowler et al. 2012), but a few studies have shown mixed results (Johnson 2004; Moore et al. 2005; Janisch et al. 2012; Kibler et al. 2013).

Variability in stream temperatures among locations (Figure 4.1) and among some study results is due to both temporally constant attributes of landscapes (e.g., elevation, topographic slope, drainage area) and temporally variable attributes (e.g., stream wetted width, stream flow) that affect the potential amount of solar radiation available at a given location (Boyd and Kasper 2003) and the thermal sensitivity of the stream, respectively. The amount of solar radiation available is often referred to as thermal loading potential or

potential solar load. At a given thermal input or load, the temperature change responsiveness of a stream is often referred to as "thermal sensitivity" (Beschta et al. 1987; Moore et al. 2005). Thermal sensitivity is influenced by many physical factors. Streams with higher flows of surface and groundwater, and hyporheic exchange rates (Cristea and Burges 2010; Arismendi et al. 2012) tend to be relatively thermally insensitive. Wood loading, channel complexity and depth can also affect thermal load and sensitivity. The potential solar load in combination with thermal sensitivity (discussed in detail below) of locations across a stream network and through time largely determine a stream thermal regime.

In addition to solar radiation, other microclimate variables - such as air temperature, wind speed, and humidity - may affect instream water temperatures. Microclimate conditions interact with energy exchanges at the air-water interface (Figure 4.2) and can thereby affect stream thermal regimes (Moore et al. 2005; Benyahya et al. 2010), especially in small streams (Caissie 2016). However, we believe the effects of microclimate on the thermal regime of streams with fully functioning riparian ecosystems are minor for two reasons: 1) microclimate effects (e.g., changes in air temperature and humidity) at forest edges rarely extend farther than one tree height into mature riparian forest (Moore et al. 2005; Rykken et al. 2007; Reeves at al. 2018), and 2) sensible heat exchanges comprise only a small portion of total heat flux in streams (Johnson 2004; Moore et al. 2005). In fact, net solar radiation effects on stream temperatures are generally about an order of magnitude greater than sensible and latent heat exchanges at the air-water interface (Moore et al. 2005; D. Caissie, Fisheries and Oceans Canada, personal communication). However, we also agree with Reeves et al. (2018), who note that the range of effects measured in different studies suggests substantial uncertainties regarding riparian ecosystem management with respect to microclimate.

Riparian ecosystem-stream temperature research appears to be transitioning from largely local, descriptive (e.g., case study and generalizations of case studies) to predictive, mechanistic, and deterministic modeling across larger areas (e.g., Boyd and Kasper 2003; Allen et al. 2007). Mechanistic models attempt to include most of the factors that affect stream temperatures (Figure 4.2) in a given area and thus do not rely on statistical extrapolation from other locations. These types of models can provide relatively accurate and precise temperature predictions at various spatial and temporal scales (Leinenbach et al. 2013). Further, they can provide useful information on systems and processes that are not readily estimated through statistical approaches used in case studies. However, collecting the environmental data necessary for accurate prediction of the effects of riparian management actions on stream thermal regimes via mechanistic models is difficult and often prohibitively expensive (Allen et al. 2007). For example, studies on the effects of riparian ecosystem or land cover management on stream temperatures at large spatial extents (e.g., watersheds of large streams or rivers) and cumulative effects are very rare. Watershed-scale studies (e.g., Janisch et al. 2012; Kibler et al. 2013) are often limited to relatively small watersheds (e.g., 2 to 1,000 ha) and second order streams.

New types of statistical models for stream network data (Ver Hoef et al. 2006; Isaak et al. 2014) have been applied to large stream temperature databases (Isaak et al. 2017a) and these have enabled relatively accurate predictions (R^2 = 0.90; RMSE = 1.8°F or 1.0°C) and mapping of summer thermal conditions across all Washington streams (Figure 4.1). Those statistical approaches use predictor variables derived from broad geospatial and remotely sensed datasets (e.g., elevation, stream slope, riparian density from the National Land Cover Database) so they do not provide insights to local temperature anomalies that could be associated with alterations of riparian or channel conditions. However,

these statistical models do provide accurate thermal status maps that could be used with mechanistic models or field measurements to better ascertain the influence of riparian conditions on stream temperatures.

Scientific knowledge of the importance of stream temperatures on aquatic species has also advanced since the publication of Knutson and Naef in 1997; especially by better describing the importance of thermal regimes (rather than only extreme high temperatures) on fish survival, growth, and productivity (Ward and Stanford 1982; McCullough 1999; Caissie 2006; McCullough et al. 2009; Hinch et al. 2012). For example, the collapse of the Fraser River Sockeye Salmon *Oncorhynchus nerka* spawning run in 2009 was largely attributed to thermal exposure due to early migration, which resulted in indirect, but often fatal, effects (Hinch et al. 2012). Following Olden and Naiman (2010), we suggest that thermal regimes can be described by their rates of change, magnitude, frequency, timing, and duration, and also their spatial distribution in a stream. The timing and duration of thermal exposure, in addition to exposure to extreme temperatures, affects the survival and productivity of many aquatic species (Caissie 2006).

Importantly, studies such as those of Murphy and Hall (1981), Murphy et al. (1981), Hawkins et al. (1983), and Bilby and Bisson (1987) that demonstrated apparent beneficial effects of reduced riparian shade on an aquatic species, such as increased salmonid growth or abundance, can now be considered in a broader ecological context. It should be noted that in these studies observed temperature increases were small and apparent beneficial effects were attributed to increased solar radiation, primary production, and consequent bottom-up stimulation of the food web. These findings are consistent with the idea that oftentimes the biological effects of altered temperatures differ among locations (Li et al. 1994; Farrell et al. 2008), and that such differences in effects may be attributed to the difference between local temperature and the thermal niche of a species. For example, in reaches where temperatures are near a species' thermal maxima, additional warming will cause the habitat to become unsuitable. However, in streams that are too cold for a species, warmer temperatures may increase habitat suitability (Isaak and Hubert 2004; Isaak et al. 2017b). In addition to direct stream temperature changes on a single species, changes may affect ecological trade-offs between species. Rezende et al. (2014) showed that faster growth might also be associated with increased competition with non-native species (Lawrence et al. 2014).

Widespread alterations of upland and riparian conditions and subsequent changes in stream composition and structure have likely already impacted thermal conditions in many streams (Poole and Berman 2001) and such impacts will be further exacerbated by the ongoing effects of climate change (Isaak et al. 2012; Holsinger et al. 2014). Streams with degraded riparian conditions, however, also offer opportunities where restoration actions could mitigate future warming and improve ecological resilience by enhancing the survival and productivity of the populations and assemblages that use those systems.

4.2. Conceptual Model

We provide a conceptual model to help describe the important components, structures, and processes that affect stream temperatures and that can result in different effects of riparian management actions on stream temperatures among locations (Figure 4.2). Our conceptual model is largely a simplification of the model "Heat Source" in Boyd (1996) and Boyd and Kasper (2003) and developed based on the preponderance of scientific evidence. Heat Source is a deterministic, mechanistic model developed to predict dynamic open channel heat and mass transfer. As such, it includes parameters for all variables that are known

to significantly affect stream temperatures. Our simplified conceptual model describes components and parameters that can have a large effect on stream temperatures or that are affected by riparian ecosystem management. We provide this model in an attempt to improve basic understanding of stream thermal processes and to identify important composition, structure, and functions that are subject to management and that affect stream temperatures. Additional information based on the models of Poole and Berman (2001), Moore et al. (2005), and Leinenbach et al. (2013) are included to more clearly identify factors that affect thermal loading potential and stream thermal sensitivity via riparian management.

Scientific understanding of the environmental factors and their relations that affect stream thermal regimes is well developed, as demonstrated by the development of deterministic, mechanistic models (e.g., Boyd and Kasper 2003) that can provide accurate temperature predictions when sufficient data are available to run the model and when the stream system remains relatively stable. Such models have been applied successfully at the spatial extent of individual stream reaches (Cristea and Janisch 2007; Cole and Newton 2013) and watersheds (Coffin et al. 2011; Bisson et al. 2013; Booth et al. 2014), suggesting that our understanding of the composition, structure, and functions that affect stream temperatures are well understood and can be

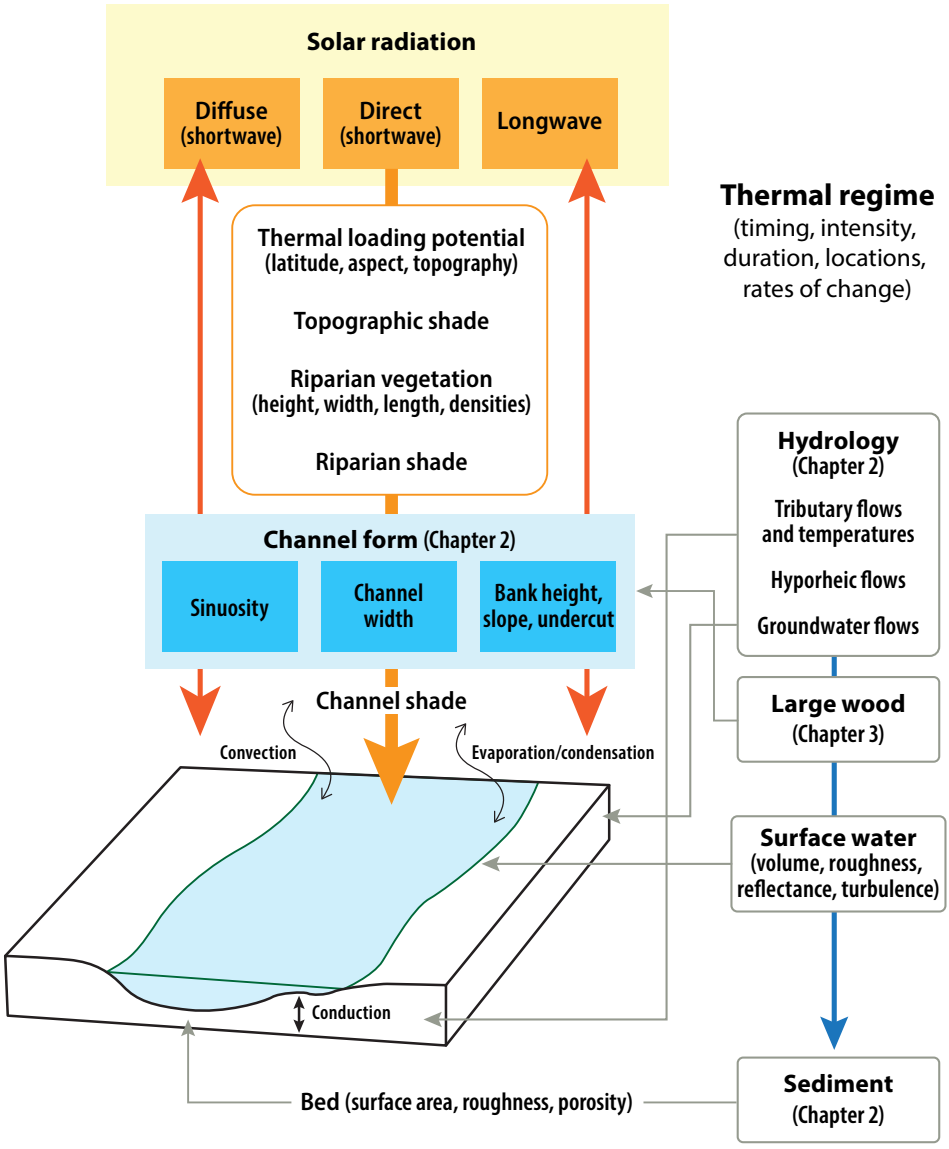


Figure 4.2. Conceptual model that identifies some factors that affect the thermal regime of stream networks. Relative importance is noted by line weight and arrows indicate directions of flows. Note that most of the elements in the model are influenced by human activities and that many components and structures are not presented here. See Boyd and Kasper (2003) for a more thorough review.



Dense tree canopies rarely provide 100% shade/Ned Pittman, WDFW

reliably applied to management problems. Rates of direct (shortwave) solar radiation reaching the stream surface and the volumes and temperatures of water are consistently identified as the dominant processes affecting the thermal regime of streams (Sinokrot and Stefan 1993; Johnson 2004). At many locations these two dominant processes are subject to management: direct solar radiation reaching a stream via vegetation management and water flows via water diversion, storage, and return (Olden and Naiman 2010).

The thermal loading potential of a stream reach is controlled in part by temporally constant and largely independent factors such as latitude, aspect, elevation, and topographic shading (Figure 4.2, Boyd and Kasper 2003; Janisch et al. 2012). Streams at high latitudes are less exposed to solar radiation, the ultimate source of heat energy to streams, than streams at low latitudes. Stream aspect affects stream temperatures because a stream's orientation relative to the path of the sun (which differs seasonally) determines the amount of direct solar radiation that a stream receives (Johnson 1971). Elevation affects the ambient air temperatures that streams are exposed to, as well as the dominant form and amount of precipitation (i.e., snow or rain). For these reasons, higher elevation streams are usually colder and commonly, although not always, less thermally sensitive than lower elevation streams (Luce et al. 2014). Topography can shade a stream from direct solar radiation and the effects of topography and aspect can interact. The effects of these four geographic factors can be difficult to detect (Isaak and Hubert 2001) and are likely responsible for some of the variability of the results of case studies that measured the effects of riparian management on stream temperatures. Note that some of these attributes (e.g., elevation) also affect the composition and structure of riparian vegetation. Stream thermal loading is not only controlled by independent factors such as latitude, aspect, elevation, and topographic shading. The scientific literature clearly identifies shade from riparian vegetation as important to stream temperatures, especially for small (narrow) streams (e.g., Beschta 1987; Poole and Berman 2001; Johnson 2004; Sridhar et al. 2004; Moore et al. 2005; Caissie 2006; Allen et al. 2007; Bowler et al. 2012; Garner et al. 2014). The effects of altered stream shading on temperatures is complex because thermal loading potential and thermal sensitivity of streams differ among locations. Some attributes, such as water volume, wetted width, and width-depth ratio can affect both thermal loading potential and thermal sensitivity (Cristea and Janisch 2007; DeWalle 2010). For a given volume of water, wider channels of the same length have a greater surface area that can intercept more direct solar radiation (Boyd and Kasper 2003) and also exchange more heat through atmospheric conduction. The width of a stream also affects the amount of shade that can be provided by topography and riparian vegetation (Cristea and Janisch 2007; DeWalle 2010). That is, riparian vegetation of given height, density, and width might shade a larger proportion of a narrow channel for a longer period than for a wide channel. Stream widths, especially wetted channel widths, are often much less temporally stable than the other factors that control thermal loading potential. Management actions that result in changes in stream width (e.g., over-grazing [Belsky et al. 1999; Chapter 2] and maintenance of wide forested riparian areas that can result in wide channels [Sweeney and Newbold 2014]) can increase thermal loading potential and thermal sensitivity.

While shortwave radiation input and water volume and temperature largely control temperature regime, longitudinal channel form (stream reach and cross section) can also affect stream temperature, for example, via high sinuosity and the presence of undercut banks (Frissell et al. 1986; Bisson et al. 2006). Channel form and features that increase stream roughness can store gravel (Buffington et al. 2004) and increase hyporheic exchange (Wondzell and Gooseff 2013) that, in turn, can affect stream temperatures by storing and releasing heat (Burkholder et al. 2008). Large wood can also store large amounts of gravel in some streams (Buffington et al. 2004) and affect channel form (Chapter 3; Keller and Swanson 1979; Abbe and Montgomery 1996; Konrad et al. 2005) which might subsequently affect stream temperatures. For example, sediment deposition due to instream large wood might increase hyporheic flow and stream width, which can subsequently effect stream temperatures. Steep or undercut banks can also provide shade (Boyd and Kasper 2003) which, in some locations (Ebersole et al. 2003b), can lower water temperatures at small spatial extents (e.g., individual pools; Ebersole et al. 2003a), even in large streams and rivers. Unfortunately, relatively few studies quantify the effects of channel form on thermal sensitivity and stream temperatures, which likely adds variability among stream temperature case studies and limits our ability to predict their relative importance at specific locations. Groundwater and tributary flows also affect stream temperatures (Malard et al. 2002) in two ways, 1) by adding volume and increasing flow velocity that can make streams less sensitive to thermal change (i.e., increasing thermal capacity), and 2) by adding water that is at a different temperature than receiving waters (Boyd and Kasper 2003; Story et al. 2003). However, the effects of groundwater flows can be difficult to detect due to spatiotemporal lags (Alvarez et al. 2004; Arrigoni et al. 2008) and difficult to apply to management due to the paucity of information describing groundwater flows. Additionally, side channels and wetlands can provide large volumes of water at different temperatures to receiving stream water (Bobba et al. 2010). Streambed attributes, such as porosity and surface area, are largely controlled by the flows of water and available sediment (see Chapter 2). Streambed attributes can affect the thermal regime of a reach by affecting heat conduction (Sinokrot and Stefan 1993), by regulating the amount and velocity of water flow through the streambed, and by controlling the rates and locations of groundwater flows (Malcolm et al. 2002). The effects of these processes on stream temperatures can be spatially and temporally discontinuous and dynamic, especially in systems where stream form is heterogeneous and dynamic (Wright et al. 2005; Wondzell 2012). Hyporheic flows often have little effect on average stream surface water temperatures except for small streams at low flows but can create discrete locations of cool water (Wondzell 2012) that may serve as important refugia for salmon. Hyporheic flows can be influenced by flow regulation (e.g., dams), which can reduce variation in both flows and temperatures that reduces the potential for hyporheic exchange to act as a thermal buffer (Ward and Stanford 1995; Poole and Berman 2001; Nyberg et al. 2008).



Juvenile salmon/Portia Leigh, WDFW

The interaction of complex in- and near-stream riparian ecosystem processes can lead to a cascade of events (i.e., a series of related events triggered by single event) and new system states (Pringle and Triska 2000; Allan 2004). These cascading events are almost impossible to predict. For example, the removal of riparian trees typically reduces shading and increases solar radiation to the stream. Even when reductions in shade have a small direct effect on stream temperatures, the loss of trees can increase bank susceptibility to erosion (Chapters 2 and 3; Micheli and Kirchner 2002; Gomi et al. 2004) resulting in a wider stream that increases thermal loading and thermally sensitivity of the stream. Similarly, channel incision resulting from riparian management, may increase local topographic shading to the stream, but lower streambed and water elevations that can shift the riparian vegetation composition and structure. This shift in riparian vegetation can result in less stable streambanks and less riparian shade that ultimately offsets any benefits of topographical shading on water temperature (Toledo and Kauffman 2001). The results of such interactions are difficult to predict because they rely on accurate predictions of changes to stream morphology, vegetation composition and structure (which interact and have non-linear responses), and water and sediment flows (which can be stochastic).

The processes that affect the timing, duration, and geographic distribution of stream temperatures are complex due to the variability of the environment in which these processes occur (Figure 4.2). The relative importance of these ecological processes differs among locations and through time (Poole and Berman 2001; Webb et al. 2008). Scientific literature is clear about the expected effect of reducing stream shading, especially during summer; water gets warmer, particularly peak temperatures. Science is less able to provide accurate and precise predictions of the effects of specific riparian management measures. For example, the studies presented in Figure 4.3 represent statistical models relating changes in riparian buffer width to changes in stream temperature. Data in Figure 4.3 are collected by measuring stream temperature before and after a reduction in the width of a forested riparian buffer which in turn decreases shade to the stream. Model output (prediction) is change in temperature related to specific buffer widths. The models tell us that reducing shade usually increases stream temperatures (following the shape of the dotted line connecting points), but they cannot predict exactly how much shade reduction will result in a specific temperature increase. A manager attempting to use the statistical model in Figure 4.3 to predict how a reduction from a fully forested site to a 30-foot wide buffer might affect summer stream temperatures is confronted with a range of possible answers. Those answers fall within the 90% credible intervals for one study representing a change between 1.25 and 2.25°C (2.25 and 4.05°F), and for another study between -0.5 to nearly 5.0°C (-0.9 to nearly 9.0°F). Uncertainty in this case describes our inability to accurately predict exact outcomes. While rarely applied due to their expense, mechanistic models and attendant data (e.g., hyporheic flows and temperatures) provide the best approach for predicting accurate site-specific outcomes from management.

Fortunately, the literature is very clear that solar radiation is often the dominant factor affecting stream heat budgets during all seasons except winter (Webb et al. 2008). Results of case studies can prove very useful by clearly describing the expected direction and shape of the relations between attributes of riparian ecosystems (e.g., width of vegetation) and stream shade and temperature. Importantly, riparian shade is often directly amenable to management and in many locations riparian vegetation height and density may be more closely associated with shade than width of riparian vegetation per se (DeWalle 2010). In any case, the literature is very clear about the importance of riparian vegetation for providing shade to streams (Figure 4.3a).

4.3. Species Sensitivity

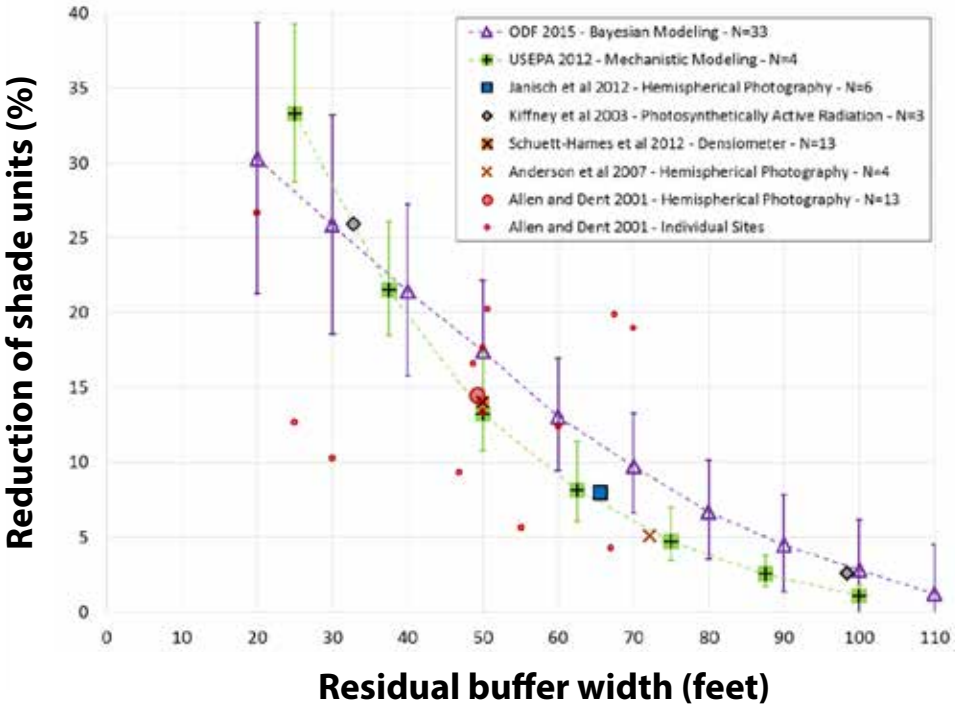
4.3.1. Fish

The scientific literature describing the importance of temperature, especially high temperatures, to fish is extensive (e.g., Brett 1952, 1971; Brett et al. 1969; Richter and Kolmes 2005). As aquatic ectotherms, the physiology of fish are strongly affected by water temperatures (McCullough et al. 2001; Welsh et al. 2001). Studies have frequently found associations between temperature and the geographic distribution (Welsh et al. 2001), spawn timing (Hodgson and Quinn 2002), growth rates, egg development and survival, competitive interactions, life stage survival, and behavior of fish (McCullough 1999; McCullough et al. 2009). Salmonids have frequently been studied because of their cultural and economic importance and their relative sensitivity to high temperatures, narrow thermal tolerance, and narrow aerobic scope (Farrell et al. 2008; Eliason et al. 2011; Ayllon et al. 2013). Summer temperature information is useful for identifying acute problems, but may be insufficient for ensuring population resilience because indirect effects and exposure to altered thermal regimes, not just extreme summer temperatures, can affect fish survival and productivity (McCullough 1999).

Recent research has increasingly focused on the effects of water temperatures and thermal regimes for fishes that have narrow thermal tolerance (i.e., range of suitable temperatures) or aerobic scope (Farrell et al. 2008; Eliason et al. 2011; Ayllon et al. 2013). This work is particularly relevant to salmonids in the Pacific Northwest that have life histories adapted to historical, location-specific thermal regimes (Brannon et al. 2004; Farrell et al. 2008; Eliason et al. 2011). Much of this research is related to the increasing threats posed by climate change, and some studies have already found evidence of existing, detrimental effects of increased stream temperatures on fish. For example, Isaak et al.



Juvenile anadromous salmon can spend up to 3 years in streams depending on the species/Ned Pittman, WDFW



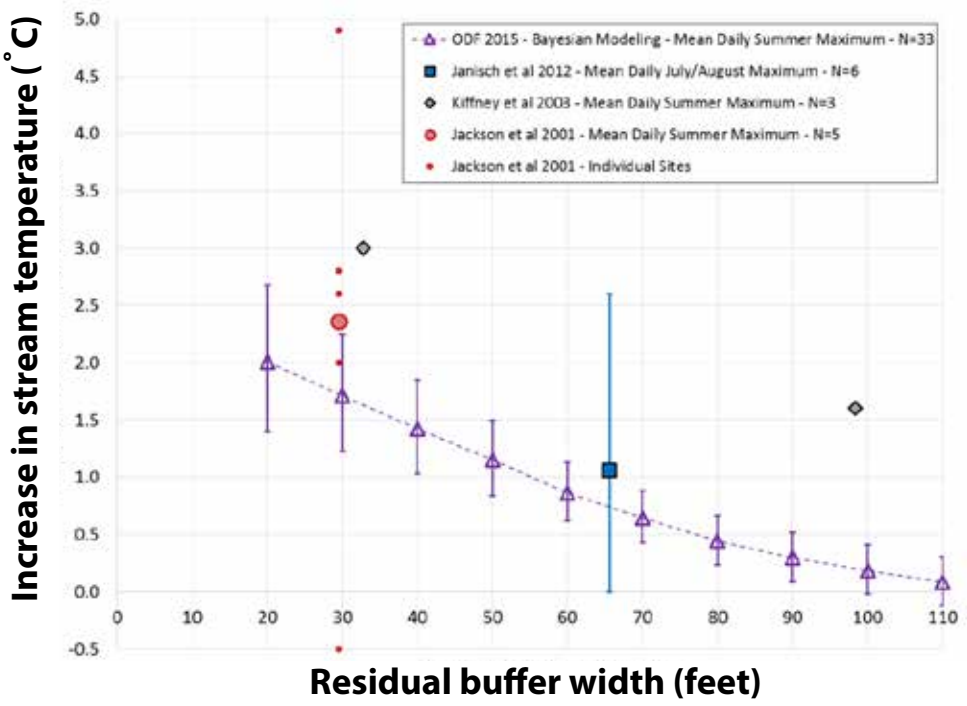


Figure 4.3. Observed shade (a: top panel) and temperature response (b: bottom panel) associated with "no-cut" riparian buffers with adjacent clearcut harvest. Only studies that employed a Before-After-Control-Impact design and conducted in Pacific Northwest forests are included. Shade unit is percent from completely shaded. Bayesian modeling results (and 90% credible intervals) were derived from data collected as part of Groom et al. (2011). Analyses provided by P. Leinenbach, USEPA Region 10.



Chum Salmon Oncorhynchus keta *in spawning colors/Ned Pittman, WDFW*

(2010, 2015) found increases in stream temperatures would result in losses of Bull Trout *Salvelinus confluentus* and Cutthroat Trout *Oncorhynchus clarkii* habitats, but also that especially cold streams could serve as climate refugia during the 21st century. Additionally, a number of recent studies have described some complex effects of altered thermal regimes to the productivity and survival of fish at different life stages and dramatic differences in thermal tolerance and aerobic scope among populations and species. For example, Hinch et al. (2012) describe complex links between the physiology, behavior, environment, disease exposure, and the effect of thermal exposure, on the population-specific survival of migrating Sockeye Salmon. Hodgson and Quinn (2002), Keefer et al. (2007), Strange (2010) and others have documented that high temperatures and previous thermal exposure can inhibit fish migration, and Marsh (1985) and Kappenman et al. (2013) have documented that high and low temperatures can impede spawning and embryo development and that optimal temperatures for embryo survival and development differ among species. Steel et al. (2012) found that thermal variability (without changing mean temperature) can affect the emergence timing and development of Chinook Salmon *Oncorhynchus tshawytscha*.

The literature is conclusive about the importance of stream thermal regimes to fish survival and productivity and also demonstrates wide variability in sensitivity to altered thermal regimes among species and among populations within species (Steel et al. 2012). More research would help us fill the sizeable gap in our understanding of the risk posed by altered thermal regimes on the survival and productivity of populations of salmonids or non-salmonid fishes, and on the ecological interactions that affect survival, productivity and population viability. For example, the time of hatching (i.e., duration of incubation) of salmonid eggs is largely determined by their thermal exposure during incubation. Relatively small changes in temperature can advance or delay maturation and subsequently hatching date (Groot and Margolis 2010) and effects of temperature can differ among closely related populations of the same species that spawn in different habitats (Hendry et al. 1998). Regardless of the ultimate cause, changes in thermal regimes can, for example, uncouple trophic interactions due to temporal mismatches, such as fry emerging when their preferred food is not available to them (Winder and Schindler 2004; Post et al. 2008). Altered thermal regimes can also affect other life stages by altering the timing of parr-smolt transformation (Zaugg and Wagner 1973), the duration of freshwater rearing (Sauter et al. 2001) which can affect ocean survival (Weitkamp et al. 2015), and the timing and success of spawning migration (Crossin et al. 2008). Altered thermal regimes can also affect ecological interactions. For example,

Wise management of riparian and aquatic systems would ideally consider the distribution and dynamics of stream temperatures in space and time and at scales that are relevant to the species in the region.

Lawrence et al. (2014) demonstrated that higher stream temperatures can expand the geographic distribution of non-native Smallmouth Bass *Micropterus dolomieu* and increase their predation on salmon. These results are complicated by the fact that effects of altered thermal regimes often differ among populations and life stages of a species, and among species (Brett 1971; Zaugg and Wagner 1973) which makes prediction of the exact effects of any riparian shade reduction and subsequent effects on stream thermal regime on fish survival and productivity uncertain. This uncertainty is compounded by fish behavioral responses, such as daily and seasonal movement among locations where thermal conditions differ (Torgersen et al. 2001).

Our understanding of the importance of altered thermal regimes on fish has improved substantially since the publication of Knutson and Naef (1997). Discussion of stream temperature by Knutson and Naef (1997) focused mostly on summer high temperatures and their effects on fish, but did not identify many components and structures of ecosystems that can affect stream temperatures or the importance of thermal regimes to fish. In particular, more recent studies are able to measure thermal exposure of fish through time, occasionally in field conditions, and estimate physiological attributes such as growth rate (Sauter and Connolly 2010).

Most studies calculate a single statistic that describes an important attribute of a stream's thermal regime (e.g., mean maximum daily summer temperature) and identify species, population, or life stage attributes that are correlated with that statistic, such as a critical thermal limit. These studies have been useful for demonstrating the importance of temperature and for setting some management objectives. However, they are insufficient for effective, long-term management of perturbed systems because changes in temperature means (i.e., chronic exposure) or extremes (i.e., acute exposure) can result in different selective pressures and evolutionary responses (Rezende et al. 2014) and because life stages, populations, and species differ widely in their sensitivity to altered thermal regimes (Farrell et al. 2008; Hinch et al. 2012). Further, we now better understand that many individual fish and especially populations use (and perhaps are dependent on) a dynamic mosaic of habitats (Fausch et al. 2002; Ward et al. 2002; Wiens 2002); that is, they move between discrete locations with different temperatures (Torgersen et al. 1999). Such movement among "patches" can be important to individual survival and population persistence because thermal conditions at discrete locations can be highly temporally variable (Dugdale et al. 2013) and spatially complex (Fullerton et al. 2015). Management of stream thermal regimes should carefully consider the spatiotemporal distribution and dynamics of thermal conditions at scales that are relevant to the species in the region (Fausch et al. 2002) at durations that are relevant to the rates of system change and recovery from disturbance.

4.3.2. Amphibians and Reptiles

Few studies address the effects of altered thermal regimes on stream-associated amphibians and reptiles, which currently limits the level of specificity to which reliable management recommendations can be made. However, some important insights are possible and these are best discussed in the context of breeding habitat: 1) amphibians that breed in the flowing portions of stream networks, and 2) amphibians and reptiles that breed in or use off-channel stillwater habitats associated with stream networks.

Instream-breeding amphibians (giant salamanders, *Dicamptodon* spp.; tailed frogs, *Ascaphus* spp.; and torrent salamanders, *Rhyacotriton* spp.) are generally described as having low thermal requirements (Bury 2008). However, those requirements are often characterized solely in terms of critical thermal maxima (Brattstrom 1963; Claussen 1973; Brown 1975; Bury



*Giant salamanders (*Dicamptodon *spp.) can be found in small western Washington streams/Eric Lund, WDFW*

2008), while stream temperatures in which these species are found are considerably lower than those maxima (invariably ≤61°F [16°C]; e.g., Brattstrom 1963; Welsh 1990; Welsh and Lind 1996; Pollett et al. 2010). Moreover, water temperatures at which these species first become stressed are entirely unknown. Several studies demonstrate higher density or relative abundances (Stoddard and Hayes 2005; Pollett et al. 2010) of amphibians at the margin of their temperature maxima although the mechanism responsible for this effect is unclear. Similar to fish, identifying critical effects of temperatures on amphibians is complicated by a host of potential variables, e.g., younger life stages frequently have cooler temperature requirements (de Vlaming and Bury 1970; Brown 1975) than older life stages. Importantly, very little research has been conducted on the effects of altered thermal regimes on the timing of life history events, such as the time of hatching, and indirect effects, such as possible ecological temporal mismatches, altered predator-prey relations, and disease frequency and effect (e.g., Hari et al. 2006), that would be useful for identifying important conservation and management actions.

Amphibians and reptiles that breed or utilize riverine off-channel stillwater habitats (e.g., oxbow lakes and permanent and seasonally flooded riverine wetlands) associated with stream networks generally have warmer thermal requirements than instream breeding amphibians. For stillwater-breeding amphibians, thermal requirements vary as a function of the thermal tolerance limits of a specific life stage (often eggs and embryos), which determine the seasonal interval in which they lay eggs. For example, Northern Red-legged Frog *Rana aurora* embryos have the lowest critical thermal maximum of any North American frog (about 68°F or 20°C) (Licht 1971), and they oviposit in late winter, at which time surface water temperatures of stillwater habitats rarely if ever put its embryos at risk. Except for our two turtle species (Western Pond Turtle *Actinemys marmorata* and Western Painted Turtle *Chryemys picta*) and selected garter snake species *Thamnophis*, especially the Common Garter Snake *T. sirtalis* and the Western Terrestrial Garter Snake *T. elegans,* few reptiles utilize aquatic habitats in the Pacific Northwest. These reptiles have



Riparian corridor/Ned Pittman, WDFW

thermal requirements that are more elevated than the temperatures generally found in stillwater habitats except during the warmest part of summer. For this reason, aerial basking (basking out of water) at daytime temperatures that are warmer than water temperature can be critical for these species for effective digestion of food or production of eggs. This pattern is especially important for turtles that need aquatic aerial basking sites isolated from predators, which in most stillwater habitats are provided by large downed wood with relatively level accessible surfaces above the water line (Holland 1994).

4.3.3. Invertebrates

Few studies have examined the effects of altered thermal regimes on stream-associated invertebrates in the Pacific Northwest. However, broad relationships between the geographic distributions of invertebrates and their thermal tolerance have been reported (Beschta et al. 1987; Moulton et al. 1993) as have changes in emergence timing and asynchronous emergence among sexes due to small increases in summer temperatures (Li et al. 2011), demonstrating the importance of temperature to invertebrates. Stream temperature can affect invertebrate density, growth, size at maturation, and sex ratios and the effects often differ among species (Hogg and Williams 1996). Altered stream thermal regimes appear to have important effects on many invertebrates and, subsequently, on stream food webs. Indirect effects such as altered predator-prey relations and disease frequency may also be important but have not been well studied. Riparian ecosystem management for aquatic invertebrates is also constrained by a general lack of information on their geographic distribution.

4.3.4. Species Sensitivity Summary

Management of vegetation in riparian ecosystems can affect stream temperatures and, subsequently, fish, amphibian, and invertebrate abundance and survival. Stream temperature influences important food web and energetic interactions between fish, amphibians, and invertebrates in multiple direct ways and likely in more subtle but relatively unstudied indirect ways (Baxter et al. 2005). The effects of thermal regime has received little study for amphibians and invertebrates. Fortunately, our understanding of the mechanisms that affect stream thermal regime can provide useful guidance in the absence of better information.

4.4. Land Use Effects

4.4.1. Urbanization

There have been very few studies specifically relating urbanization to riparian ecosystem function and subsequent effects on stream thermal regimes (Paul and Meyer 2001). Clearly, urbanization related changes to riparian areas can be similar to riparian changes associated with agriculture and forestry as far as stream temperature is concerned, e.g., removal of shade, reduction in large wood inputs. Urban areas have additional issues that can affect stream temperatures including heat island

effects, and inputs of wastewater and runoff from impervious surfaces (Kinouchi et al. 2006; Hester and Doyle 2011). Some of these complicating factors may contribute to the absence of detectable effects on stream temperatures studies in some comparative studies (Wahl et al. 2013). Nonetheless, urbanization is considered to have adverse effects on stream temperatures (LeBlanc et al. 1997; Finkenbine 1998), especially when riparian functions are affected (Booth et al. 2001). To protect stream thermal regimes in urban settings, conservation efforts should focus on maintaining riparian functions, mitigating anthropogenic changes to hydrology, and preserving watershed connectivity (e.g., movement of water, sediment, wood, nutrients, and species).

4.4.2. Agriculture

In comparison to urbanization studies, studies of the effects of agricultural practices on riparian ecosystems or subsequent effects on stream thermal regimes are fairly abundant, especially for grazing lands (e.g., Li et al. 1994; Tait et al. 1994; Maloney et al. 1999; Zoellick 2004) and crop lands (e.g., Waite and Carpenter 2000). Studies examining the effects of agriculture, particularly livestock grazing, generally find stream temperature increases associated with disturbance of the riparian ecosystem (Zoellick 2004; Webb et al. 2008). Livestock use of streamside areas can increase a stream's exposure to direct sunlight by reducing shade from streamside vegetation (Li et al. 1994). Livestock can also reduce the amount of undercut banks and increase stream channel width through trampling and vegetation removal (Belsky et al. 1999; Chapter 2). Channel widening can also result in reduced depth, which can exacerbate warming (Poole and Berman 2001). However, results of observational studies are mixed, with occasional absences of predicted detectable increases in stream temperature due to changes in riparian ecosystems as a result of agriculture (e.g., Tait et al. 1994) and wide variation in effect on riparian vegetation among locations and types of agriculture (see Maloney et al. 1999). Importantly, Zoellick (2004) found that riparian vegetation can recover after removal of the disturbance agent (e.g., livestock). For crop lands, the importance of riparian ecosystem attributes, e.g., vegetation width, height and density, on stream temperatures have been documented (Waite and Carpenter 2000) and, similar to grazed lands, effects differ widely among locations (Benedict and Shaw 2012).

Studies of the effects of land management on riparian functions and stream temperatures confirm the importance of riparian ecosystems to stream thermal regimes.

4.4.3. Forestry

Relative to urbanization and agriculture, many studies in the Pacific Northwest have examined the effects of forest management on stream temperatures. Decades of research have frequently documented increased stream temperature due to forestry practices (Olson and Rugger 2007), and our understanding of the mechanisms by which forest practices affect stream temperatures is well developed (Beschta et al. 1987; Groom et al. 2011). Most studies find that forestry, especially when riparian vegetation is disturbed, results in higher stream temperatures than in less disturbed locations (Li et al. 1994), however, exceptions to this pattern are not uncommon. For example, Liquori and Jackson (2001) found stream temperatures 3 to 7°F (1.5 to 4°C) greater in stream reaches surrounded by dense riparian forests compared to downstream reaches

adjacent to scrub-shrub riparian communities.
Many of the studies of the effects of forestry on stream temperatures include consideration of some of the components and structures that affect stream thermal regimes identified by Boyd and Kasper (2003) and Poole and Berman (2001). For example, Liquori and Jackson (2001) suggest that their results are due to lower width-to-depth ratio, higher rates of hyporheic or groundwater exchange, and greater amounts of shade in shrub-scrub associated reaches. Maloney et al. (1999) found that much of the variation in their results (in mostly agricultural settings) was explained by reach length, shade, elevation, aspect, and especially by stream gradient and air temperature. Similarly, Kiffney et al. (2003) and Janisch et al. (2012) described the influence of groundwater and hyporheic exchange on their results.

4.4.4. Land Use Summary

Studies of the effects of land management, especially the many studies of forestry, on riparian functions and stream temperatures confirm the importance of riparian ecosystems to stream thermal regimes. Additionally, they emphasize the high degree of variability among locations of the functions that affect stream thermal regimes, even among adjacent stream reaches, that so often produce variable results. Unfortunately, studies that examined the effects of land management on the complete thermal regime of a stream are lacking. Such studies could be especially valuable because the cumulative effects of riparian ecosystem or upland management on stream temperatures can dominate local effects (Chapter 8). Further, most studies use only a few statistics that describe peak or average temperatures, usually during summer. Such statistics are useful, but have limited ability to address dynamic, water quality parameters including temperature (Poole et al. 2004) related to species needs. Thus, predicting the effects of land management on other thermal attributes (e.g., duration or frequency of stressful temperatures) or during other seasons when thermal exposure can significantly affect some species (e.g., overwinter incubation) is difficult. Similarly, even cumulatively, the relatively small number of studies and their skewed geographic distribution (i.e., most are on low-order streams in maritime regions) constrain our ability to provide broad and precise generalizations or make accurate predictions to other locations. Conservation efforts for maintaining stream thermal regimes must be based on our understanding of direct and indirect mechanisms of stream heating affected by human activities, wise use of statistical models relating shade and stream temperature across the watershed until mechanistic models become available, and preserving watershed connectivity (e.g., movement of water, sediment, wood, nutrients, and species).



Light through alder tree canopy/Ned Pittman, WDFW

4.5. Conclusions

Scientific understanding of the structure and function of streams and the importance of thermal regimes has improved substantially since the publication of Knutson and Naef (1997). This understanding underscores the need to consider temperature statistics other than the daily maximum temperature during summer. We now have mechanistic,



Giant salamander (Dicamptodon *spp.*) *egg cluster/Jack Armstrong, WDFW*

deterministic models that can accurately predict changes in stream temperatures for specific locations due to specific management actions in the riparian ecosystem. We are also better able to set directional or qualitative expectations for cumulative effects on temperatures at the spatial extent of watersheds. However, quantitative information needed to run mechanistic, deterministic models to make site-scale predictions (e.g., surface water and groundwater flows and temperatures) is expensive to collect and thus are rarely used in management settings. Further, even the most capable stream temperature predictive models are limited by the assumption that the channel structure remains relatively stable (e.g., cross-section shape will not change) even though there is strong evidence that riparian and some types of upslope management affects channel stability (Chapters 2 and 3) at least in some reach types.

Scientific models and most observational studies find that shade from riparian vegetation can affect stream thermal regimes, particularly by lowering peak temperatures during summer. Recent monitoring studies have found substantial variation in the thermal sensitivity of apparently similar stream reaches. The use of improved monitoring tools (e.g., digital temperature loggers), more robust study designs e.g., Before-After-Control-Impact designs (Eberhardt 1976; Stewart-Oaten et al. 1986), more powerful statistical analyses (Gomi et al. 2006; Isaak et al. 2014), and longer study durations have improved our ability to detect effects of riparian management actions on stream temperatures. Importantly, better understanding of the structure and function of streams, especially the importance of surface, ground, and hyporheic water flows on stream temperatures, has allowed scientists to identify likely causes for failures to detect effects of riparian shade reductions on stream temperatures.

Scientific understanding of the importance of stream temperatures on aquatic species has improved substantially over the past two decades, especially for salmonids. Most studies provide useful descriptions of some direct effects of exposure to high temperatures on specific life stages. Laboratory and field studies demonstrated the importance of temperature on fish survival and allowed for comparisons among species, populations, and life stages, and thus the identification of those that are likely most sensitive to heat stress. They have also demonstrated substantial differences in sensitivity among species, populations, and life stages which make developing simple thermal standards challenging and likely inadequate for management. Several recent studies have described effects of prolonged exposure to elevated, but non-lethal, temperatures and altered thermal regimes. These studies demonstrate some of the complexity of this management challenge. Even when altered thermal regimes do not have immediate lethal effects on species, there are costs or trade-offs, such as changes in growth, survival, productivity, and energetic requirements. Detecting such effects is beyond the scope of most studies and will often require long-term, comprehensive monitoring of populations through several life cycles. Such studies will likely need to be conducted at spatial



Salmon eggs in Morse Creek/Steve Boessow, WDFW

extents and durations that account for fish behavior, such as daily and seasonal movement among locations where temperature regimes differ.

Relatively few studies that describe the effects of temperatures or thermal regimes on reptiles, amphibians or invertebrates have been completed. Most studies of these taxonomic groups have simply identified seasonal thermal preferences in the field or the effects of acute temperature in laboratory settings. Such studies are valuable for identifying thermally sensitive species, but are insufficient for management. Further, we found no study that addressed ecological interactions that might be mediated by riparian condition on a stream's thermal regime.

Studies generally show that the effects of urbanization, agriculture, and forestry on watershed and riparian ecosystems result in warmer summer stream temperatures, an expectation consistent with the conceptual model. Importantly, these land uses often include surface water routing to streams (e.g., roads and ditches) that can change the timing, intensity, duration, and temperatures of stream flows. The changes in temperature detected differed among regions, land uses, and studies. The relatively low number of studies and high variability among study results limits our ability to accurately predict outcomes in unstudied locations and precludes us from reliably calculating a mean (i.e., expected) resulting temperature change, even for a specific temperature statistic. Of the studies we reviewed, most were designed to detect an effect using a specific stream temperature statistic (e.g., mean daily maximum summer temperature) rather than changes in the stream's thermal regime. This limits the inferences that can be made, especially from studies in which anticipated temperature changes were not detected, and to make reliable, precise generalizations from study results.

Although we have sound understanding of the composition, structure, and functions that affect stream thermal regimes, substantial uncertainty remains regarding the effects of any specific riparian management action on stream thermal regimes in most locations. That uncertainty is amplified by our relative lack of understanding at large spatial and long temporal extents for which few studies have been

completed. Recovery of stream temperatures due to shade from vegetation regrowth can occur in less than a decade following disturbance (D'Souza et al. 2011), but recovery rates differ widely among locations due to differences in stream size and components that control rates of vegetation re-establishment and growth (Gecy and Wilson 1990; D'Souza et al. 2011). Although scientists are very certain that temperatures and thermal regimes are important to many aquatic species, relatively little is known about ecological interactions (e.g., predator-prey relations), behaviors (e.g., movement among locations of different temperature), and indirect effects (e.g., effects on the rates and severity of disease). These interactions may be very important. For example, Lawrence et al. (2014) suggest that riparian restoration in some locations might prevent extirpation of Chinook Salmon and restrict the expansion of non-native fish in some locations by maintaining relatively cool stream temperatures. Such uncertainties often compound and should be addressed explicitly when making management decisions, especially when the decisions can have important, lasting effects (Harwood and Stokes 2003). Management of riparian ecosystem composition (e.g., vegetation species, side channels) and structure (e.g., longitudinal and lateral connectivity) can importantly benefit aquatic species. Management for such beneficial effects might prove especially important as our climate continues to change.

The state of the science regarding stream thermal regimes is uneven. On the one hand, we have a very good understanding of the physics of stream heating and cooling. We understand the relative magnitudes of direct and indirect effects of ecosystem changes on stream thermal regimes and have the ability to quantify these effects given enough time and resources. Shade provided by riparian vegetation is generally considered the single most important, albeit not the only, process of the system that humans can directly effect. These findings are undisputed. On the other hand, because thermal regimes are affected by a variety of factors and their interactions, stream temperatures are difficult to precisely predict on the basis on any single factor alone (e.g., shade). Thus, predicting stream temperature based solely on shade removal or buffer width will likely always suffer from imprecision. In addition to this prediction challenge, and despite the fact that we know suitable water temperatures are critical to the persistence of aquatic species, we are only now beginning to understand how aquatic organisms interact with and are impacted by changes in the stream thermal regime. The combination of what we know and do not know about how changes to stream thermal regimes affect aquatic species and how human activities can affect those regimes makes conservation in the face of a changing climate particularly challenging.

4.6. Literature Cited[1]

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Long-toed salamander Ambystoma macrodactylum/*Scott Fitkin, WDFW*

Chapter 5. Pollutant Removal

By: Jeffrey L. Ullman and George F. Wilhere

5.1. Introduction

The capability of riparian areas to remove certain pollutants from runoff has been known to scientists for over 60 years (e.g., Trimble and Sartz 1957). Understanding the complex processes and associated factors that affect the pollutant removal function of riparian areas is essential for developing management strategies that will protect aquatic ecosystems. Management of riparian areas for pollutant removal differs from the other ecological functions discussed in this document in that the primary focus is on mitigating activities occurring outside the riparian area. The pollutant removal function is unique in that it only exists in the presence of human activities that generate polluted water, and it is only necessary when runoff from upland activities threaten to degrade water quality.

This chapter summarizes key information relevant to riparian pollutant removal function. First, a general background is presented on the main processes and related site-level factors affecting the transport and fate of nonpoint source pollutants in riparian areas. Next, the biological impacts, common sources, *in situ* chemistry, transport pathways, and mitigation are reviewed for five types of pollutants—sediments, excess nutrients, metals, pesticides and other organic compounds, and pathogens. Last, a summary of what is currently known about the relationships between riparian buffer width and pollutant removal is provided. Riparian buffer is not synonymous with riparian area. Riparian area is an ecological designation that is synonymous with riparian ecosystem (see Chapter 1). Riparian buffer is a management designation, and a buffer may be narrower or wider than the riparian ecosystem.



Yellowjacket Creek/George Fornes, WDFW

This chapter only addresses nonpoint-source chemical pollutants that interact with riparian areas. Hence, it does not deal with "thermal pollution" effects on water temperature (see Chapter 4), which is another important water quality parameter. Similarly, it does not deal with pollutants routed via roads, ditches, and drains into urban and suburban stormwater runoff systems, or with polluted water routed to rivers and streams via agricultural tile drainage.

While the scientific literature reviewed here includes information collected during the 1970s and 1980s, when scientists first started to rigorously investigate the removal of pollutants by riparian areas (Correll 1997), more recent findings are highlighted. Decades of research have revealed that the ecosystem structures and processes responsible for pollutant removal functions of riparian areas are complex, spatially and temporally variable, and dependent on site-level environmental conditions. This complexity and variability are the main reasons for inconsistent results found in the published research and the lack of definitive recommendations regarding the structure and size of riparian buffers required for pollutant removal. Nevertheless, general trends in research findings can guide policy makers and resource managers to management strategies that address these uncertainties and lead to adequate protection of water quality.

5.2. The Pollutant Removal Function of Riparian Areas

Water quality refers to the physical, chemical, and biological characteristics of water that indicate a waterbody's suitability to meet human needs or habitat requirements for fish and wildlife. Riparian areas exert a significant influence on water quality due to their position between terrestrial and aquatic ecosystems. Pollutants in dissolved, chemical, or suspended solid forms are transported by water from uplands to surface waterbodies, and while passing through riparian areas contaminated water undergoes a variety of physical, chemical, and biological processes that reduce pollutant concentrations. The processes in riparian areas affecting pollutant transport and fate are complex and often interrelated. Riparian areas slow surface runoff and increase infiltration of water into the soil, thereby enhancing both deposition of solids and filtration of water-borne pollutants. Riparian areas also intercept and act on contaminants in subsurface flow through dilution, sorption[1], physical transformation, chemical degradation, or volatilization by various biogeochemical processes and through uptake and assimilation by plants, fungi, and microbes.

There is overwhelming evidence in the scientific literature that riparian buffers reduce nonpoint source water pollution for a variety of pollutants—including sediments, excess nutrients, metals, organic compounds such as pesticides, and pathogens. Management activities can enhance the physical, chemical, and biological mechanisms that reduce the flow of polluted waters to river and streams.

1 Sorption or "to sorb" is a physical and chemical process by which one substance becomes attached to another. It encompasses two processes adsorption and absorption. Adsorption is the binding of molecules or particles to a substance's surface. The reverse of adsorption is desorption. Absorption is the filling of minute pores in a substance by molecules or particles.



Riparian buffer widths for pollution removal need not be one-size-fits-all/U.S. Dept. of Agriculture, National Agriculture Imagery Program

However, the science is very clear that results vary considerably depending on local conditions, and that the configuration of a riparian buffer may effectively remove one type of pollutant while having minimal effect on another. Although riparian management can reduce significantly the quantity of pollutants entering surface waters, riparian areas are not sufficient by themselves to fully mitigate pollution from nonpoint sources. Thus, it is critical to view pollution control from a holistic, watershed perspective that also manages contaminated runoff at its source, i.e., upland areas subjected to various intensive land uses: forestry, agriculture, commercial, and urban, suburban, and rural residential. Nevertheless, maintaining functional riparian areas is essential for reducing nonpoint source pollution and must be a key component in any suite of management actions focused on water quality.

5.3. Processes Influencing the Pollutant Removal Function

Riparian areas are consistently shown to remove a variety of nonpoint source pollutants, such as those originating from agricultural lands, urban areas, construction sites, and forestry operations. However, the effectiveness of riparian buffers is highly variable (Hickey and Doran 2004; Lee et al. 2004, Anbumozhi et al. 2005; Zhang et al. 2010). Inconsistencies among research results can be explained by the multi-dimensional heterogeneity of riparian ecosystems; the complex, interconnected processes that act on contaminant transport and fate; and the variety of research methods employed. Many site-specific factors contribute to this variability,

including riparian buffer width, slope, topography, surface and subsurface hydrology, soil properties, riparian vegetation, and adjacent upland characteristics. Of all these factors hydrology, soil, and vegetation play dominant roles governing pollutant transport and fate (NRC 2002). The following sections discuss the effects of these three site-level characteristics on the pollutant removal function of riparian areas.

5.3.1. Hydrology

Hydrologic regimes at the terrestrial-aquatic interface impart a particularly significant influence on the attenuation of pollutants by riparian areas. Three principal pathways govern water movement through these systems: 1) overland flow and shallow subsurface flow from adjacent uplands, 2) groundwater flow, and 3) instream water movement that includes hyporheic exchange as well as flood conditions (NRC 2002). Each of these flow paths can act as conduits for pollutant transport to aquatic ecosystems depending on site-specific conditions and pollutant type. Furthermore, seasonal stream flows, fluctuating water tables, and intermittent flooding create a dynamic environment that subjects pollutants to a range of biogeochemical processes.

Upland sources of water often originate as precipitation. During and immediately after a precipitation event, water from upland areas follows different flow paths to the stream channel, each contributing differently to pollutant transport and fate. Overland flow can be either infiltration-excess[2] (Hortonian overland flow) or saturation-excess[3] overland flow. Water that enters the soil profile can also travel downslope in shallow subsurface flow (interflow) through the unsaturated zone[4]. Depending on site-specific conditions, water in one of these flow paths may switch to another.

Collectively these flow paths are commonly termed hillslope runoff. Under certain circumstances, such as in the presence of deep, well-drained soils that facilitate percolation, portions of the shallow subsurface flow can reach the groundwater table and resume transport in the groundwater system. These pathways extend into riparian areas before reaching a surface waterbody.

As overland flow travels through the landscape it can pick up pollutants that can be in either particulate or soluble form. When water infiltrates the soil surface, suspended particulate matter and associated contaminants are entrapped at the soil surface, almost exclusively limiting the form of pollutants that are transported through the subsurface to soluble forms that remain in solution. However, recent research highlights the significance of colloid-facilitated transport as an additional means by which contaminants can move through the subsurface (Sen and Khilar 2006; Bradford and Torkzaban 2008). Colloidal forms (particles ranging from 1 to 1,000 nm) can remain dispersed in solution and exhibit characteristics resembling solutions. This behavior can consequently mobilize substances that tend to sorb to soil particles or organic matter that would otherwise not be able to move through the subsurface. While the fundamental physics and chemistry of this mechanism is understood, the contribution of colloids to pollutant migration through the soil profile is unresolved. Essentially no literature exists on the role of colloids in riparian areas, contributing to uncertainty in predicting the ultimate fate of associated pollutants.

The fundamental variables of interest regarding groundwater are flow rate and travel time, which influence natural chemical and biological processes that remove soluble pollutants, such as sorption to soils, microbial degradation, and plant uptake (Vogt et al.

2 Infiltration-excess overland flow occurs when water enters a soil system faster than the soil can absorb or transport it, such as when precipitation exceeds the infiltration capacity of the soil.

3 Saturation-excess overland flow occurs when the soil becomes saturated, and any additional precipitation results in runoff.

4 The unsaturated zone is also known as the vadose zone. It extends from the ground surface to the water table. Beneath the water table is the zone of saturation.

2012). As groundwater approaches the stream margin biogeochemical activity increases, and this gradient contributes to temporal and spatial variability in solute fluxes (Hayashi and Rosenberry 2002). It should be noted that groundwater exhibits a different geochemical composition than shallow subsurface flow that originates from precipitation events. Groundwater samples typically have a greater specific conductance (related to salinity), higher mineral content and elevated pH (Landmeyer 2011). Differences in chemical composition and biogeochemical activity are likely to manifest differences in pollutant removal from groundwater.

The hyporheic zone is the region beneath and alongside the streambed that represents the groundwater-surface water interface. While hydrologists have a solid understanding of most other hydrologic processes occurring in riparian areas, understanding of the exchanges between groundwater and in-channel surface waters is considerably less (UKEA 2009; Gu et al. 2012). Hyporheic flow patterns are multifaceted and influenced by the pressure gradient at the stream margin, (micro)morphology of the channel, the spatial distribution of hydraulic conductivity along the streambank, and the water exchange rate between the river and the riparian area (Kalbus et al. 2009; Lewandowski 2011). The complexity of the hydrologic regime is further compounded by seasonal variations, and at times intra-seasonal oscillations, in the direction of water flow (Wroblicky et al. 1998), as well as instances where ambient movement of deeper groundwater flows near the interface. Despite the confounding nature of the hyporheic zone, it is vital to consider hyporheic exchange when discussing subsurface fluxes of pollutants, as this zone is a direct link to streams through which contaminants can be transported to lotic systems (Gordon et al. 2004).

As groundwater approaches a streambank, biogeochemical activity increases. Groundwater flow rate and travel time through the riparian area influence natural chemical and biological processes that remove soluble pollutants.

Not only does the hyporheic zone play a critical role in regulating pollutant fluxes from riparian areas to the adjacent lotic environment, the heterogeneous structure at the interface, an oscillating water table, and shifting flow regimes exert a significant influence on biogeochemical cycling. The fluctuating water table alters oxygen concentrations and oxidation-reduction (redox) potential, and the flow regime provides a continuous source of reactants. This dynamic environment allows for anaerobic and aerobic processes to occur simultaneously and in close proximity (Wang et al. 2014). The strong hydraulic and biogeochemical gradients that result from mixing of the subsurface water coming from riparian areas and the surface water of the stream channel create biogeochemical hot spots that exhibit disproportionately high reaction rates compared to the surrounding matrix (McClain et al. 2003). For instance, the convergence of shallow subsurface flow and groundwater at the stream interface can generate hot spots of denitrification. Similarly, hot moments represent brief periods of elevated reaction rates relative to longer periods (e.g., during a rainfall event). Later sections of this chapter discuss this concept in more detail.

5.3.2. Soils

Soils play a critical role in influencing the transport and fate of pollutants in riparian areas. Soil texture and structure act as primary hydrologic regulators, significantly influencing the movement and distribution of contaminants. Comprised of a complex mixture of solid, liquid, and gaseous phases, riparian soils provide a heterogeneous matrix that supports plant and microbial communities. The solid phase encompasses mineral and organic particles of differing sizes and chemical composition that can sorb metals, organic chemicals, and other pollutants, thereby preventing them from migrating to the stream channel. The multiplicity and interaction of various biogeochemical processes in riparian soils contribute greatly to pollutant removal.

Unlike upland soils that are derived from terrestrial parent material, riparian soils primarily develop through the deposition of sediments that originate from various upstream sources. These alluvial deposits establish a heterogeneous patchwork of stratified sediments of different textures, which influences the movement of waterborne contaminants. Huggenberger et al. (1998) provide a good review of the geomorphology and characterization of alluvial soils, but a brief description is warranted here to provide a background related to the movement of contaminants through riparian soils. Deposits of clay, silt, sand, and gravel, and continual disturbance by seasonal high flows and occasional extreme flood events, create a complex mosaic of soil microenvironments that can vary considerably both vertically within the soil profile and along the length of the stream channel (Malanson 1993). A general trend can be observed where coarser sediments are deposited along steep-gradient streams while finer particles are washed downstream and deposited along low-gradient reaches as stream energy dissipates and wider floodplains develop (BLM 2003). Soil particle size also tends to decrease moving away from the stream edge (Huggenberger et al. 1998). This vertical, longitudinal, and lateral spatial structure results in disparate hydrologic conditions, and corresponding differences in pollutant fate, at locations in close proximity.



Rough-skinned Newt Taricha granulosa/*Renee Kinnick, WDFW*

The soil microenvironments described above influence hydrologic conditions, which consequently affect pollutant transport. Soil texture and structure dictate water storage capacity and retention, flow paths and hydraulic conductivity. Coarse textured soils enable a greater hydraulic conductivity that shortens hydraulic residence time in the riparian area, thereby reducing the period in which attenuation mechanisms can act on soluble contaminants before they reach the stream channel. Water may percolate below the root zone and limit potential interactions between vegetation and pollutants in deep, well-drained soils, such as those commonly found in forested riparian areas in humid climatic regions (NRC 2002). However, the root zone intercepts subsurface flow to a greater degree in forested riparian areas that exhibit shallow soils overlying a confining layer (e.g., shallow aquiclude). Overland flow that predominates in arid environments often undergoes limited infiltration due to a tendency for riparian soils to exhibit low permeability in these regions, which allows much of the runoff and associated waterborne contaminants to enter the stream with minimal attenuation (NRC 2002; Buffler et al. 2005).

Altered soil structure can influence pollutant attenuation (Vervoort et al. 1999). Compaction, for instance caused by over-grazing or vehicular traffic, and accompanying structural changes and surface soil instability can lead to diminished infiltration and amplified overland flow (Bohn and Buckhouse 1985; McInnis and McIver 2001). Soils with low infiltration rates typically exhibit a diminished capacity to retain pollutants in riparian areas (Johnson and Buffler 2008). Subsurface soil structure influences water movement and distribution in the unsaturated zone, affecting pollutant transport. Subsurface soil structure also impacts soil aeration and plant root growth, which have ramifications on pollutant fate. Preferential flow in soil macropores represents another facet of soil structure that affects pollutant removal (Allaire et al. 2015). Preferential flow of water through large connected void spaces in soils, which result from fractures, animal burrows and other processes, can enhance subsurface pollutant transport to river systems (Angier et al. 2002; Fuchs et al. 2009; Menichino et al. 2014). Alluvial deposits in riparian areas can further increase the connectivity of subsurface flows with stream channels, increasing lateral contaminant transport toward the stream channel. Preferential flow paths diminish the potential for contaminant sorption by both reducing interactions with soil particles and associated sorption sites and contributing to a higher flow velocity that reduces sorption kinetics. Although preferential flow paths have been a familiar concept in the field of soil science for some time, the recognized importance of these conduits has increased in recent years. This enhanced understanding is particularly important for controlling pollutants such as phosphorus that historically were not considered to undergo much, if any, subsurface transport (Angier et al. 2002; Fox et al. 2011a).

Artificial preferential flow also can be created by tile drains that are used by agricultural operations to remove excess water from the soil profile. Tile drains have been shown to enhance the movement of nutrients and herbicides from agricultural fields to streams, bypassing the natural attenuation processes that would have otherwise reduced the movement of these agrochemicals to aquatic ecosystems (Guan et al. 2011; Vidon and Cuadra 2011; Jaynes and Isenhart 2014).

In addition to playing an integral role in influencing the hydrologic linkage between upland areas and the stream channel, riparian soils provide a dynamic framework that regulates biogeochemical processes that act on contaminants. Soluble pollutants that have entered the soil profile, either from subsurface flow from upland areas or through infiltration in the riparian area, are subject to a variety of processes. Contaminants prone to sorption can be retained within the soil profile of the riparian area, reducing their potential of migrating to the stream channel. Chemicals typically have a greater affinity for clay minerals or organic matter, and thus the attenuation due to sorption will vary depending on



Riparian area along White River/Alan Bauer

the soil composition. Microbial assemblages in riparian soils can contribute to the assimilation, transformation, and degradation of a range of chemicals. Anaerobic conditions in saturated soils found in riparian areas differ considerably from the aerobic environments of adjacent uplands, altering the redox potential. The fate of numerous contaminants is influenced strongly by the redox potential of the soil and associated microbial communities. Fluctuating water tables can alter the redox state, resulting in seasonal variations in chemical species distributed within the riparian area. Although broad generalizations can be made, the literature highlights that temporal changes in soil complexities are not well understood (NRC 2002).

Vegetative communities are also impacted by soil conditions in riparian areas. Plant species exhibit habitat preferences that follow soil moisture gradients across riparian areas. The influence of vegetation on contaminant fate and transport will be discussed in the next section. However, it is salient to note here that soil compaction and other disturbances can lead to invasive plant species that can degrade riparian ecosystem function in relation to pollutant attenuation. Disturbed soils can lose their native species diversity and develop more homogenous stands of an exotic species (e.g., Himalayan Blackberry *Rubus armeniacus*) that often do not have the same vegetative density or root structure as the native population, thereby altering riparian area efficacy in pollutant removal.

5.3.3. Vegetation

Riparian vegetation also plays a critical role in attenuating pollutant transport to surface waters. Plants physically alter the movement of water and associated contaminants, provide habitat for microbial communities that assimilate and transform contaminants, and influence soil redox conditions that govern many biogeochemical cycles. Plant root systems provide bank stabilization, which reduces the direct introduction of sediments into aquatic ecosystems via streambank erosion. Soil stabilization also limits erosion and gully formation that can result from overland flow moving through a riparian area. In addition, forested riparian



Vegetated buffers reduce nonpoint source pollution to rivers and streams/U.S. Dept. of Agriculture, National Agriculture Imagery Program

areas have been shown to enhance instream processing of contaminants, including nutrients and pesticides (Sweeney et al. 2004). This section provides a brief overview of the influence vegetation has on pollutant attenuation in riparian areas and identifies critical points to consider when developing management plans. A number of focused review articles present further details on riparian vegetation-hydrology interactions and mechanisms by which plants can attenuate contaminants in riparian areas (e.g., Tabacchi et al. 2000; Williams and Scott 2009; Dosskey et al. 2010).

The high vegetation density inherent in streamside ecosystems serves a critical function in modulating overland flow and amplifying infiltration. The stems of grass and herbaceous groundcover, trunks of woody vegetation, and downed wood create resistance to overland flow, slowing it, and causing deposition onto and infiltration into the soil profile (Fisher and Binkley 2000; Schuster and Grismer 2004). Vegetation also helps maintain soil structure by increasing soil macropore formation through root growth and decay, which further enhances soil permeability. Soluble contaminants present in overland flow enter the soil column, augmenting attenuation through the various mechanisms discussed throughout this chapter. The reduced velocity of the overland flow caused by the riparian plant community causes suspended particles to settle out of the water column, reducing the transport of sediment and sediment-borne pollutants to the stream. Similarly, lower velocity flows will limit erosion within the riparian area, reducing potential contributions to stream sediment loads and avoiding gully formation, which concentrates overland flows and short circuits pollutant attenuation. A dense overstory canopy will further reduce erosion by intercepting precipitation



that would fall directly onto bare soil, and a dense plant community also reduces erosion of riparian soils by diminishing the velocity of runoff and floodwaters (Schultz et al. 2000).

Vegetation also increases soil surface roughness by producing herbaceous litter and woody debris, and by altering micro-topography, which slows surface flow and enhances infiltration of water. In contrast, sites with exposed mineral soil tend to exhibit low surface roughness that limits infiltration, and these sites are susceptible to increased transport to streams via overland flow.

Vegetation also influences the hydrologic behavior of subsurface and groundwater flow through streamside areas. Root uptake and transpiration by both herbaceous and woody plants can modify subsurface flow and soil moisture regimes in the unsaturated zone under unsaturated conditions. These alterations not only influence pollutant transport through riparian soils, but also affect redox conditions that govern biogeochemical transformations. Deeper-rooted plants can impact groundwater levels by reducing the pressure head at the water table through direct uptake or by extracting water along a water potential gradient. Hence, trees can cause daily or seasonal changes to water table levels, a phenomenon more prevalent in drier climates (Landmeyer 2011). Correspondingly, contaminant fluxes from riparian areas to surface waterbodies may exhibit similar diurnal and seasonal patterns. Water uptake by roots can similarly form a hydraulic barrier that creates an upward water flow through the soil profile that can reduce pollutant leaching and inhibit contaminant plumes from spreading horizontally (Pilon-Smits 2005).



Chinook salmon Oncorhynchus tshawytscha/*Morgan Bond*

While vegetation modulates water flow, it is vital to recognize the interconnected nature between riparian plant communities and hydrologic regimes. Riparian plant communities are determined largely by their adaptation to high moisture environments. Groundwater often represents a primary water source for riparian plants, principally trees and deeper-rooted flora. Consequently, alterations in groundwater regimes can have a detrimental impact on species diversity, density, and distribution, especially in drier regions where vegetation is typically concentrated along a narrow band of suitable soil moisture conditions (NRC 2002). Dramatic changes to plant communities can significantly limit the pollutant removal function of a riparian area. Thus, managers should consider the interrelationships between vegetation and subsurface hydrology. Kuglerová et al. (2014) expounded on this theme in a recent review examining the effects of forest management on groundwater processes and resultant water quality. The authors concluded that logging operations in riparian areas and hydrologically connected upland forests can alter groundwater regimes and affect water quality. They recommended site-specific riparian management where wider buffers would be implemented at critical groundwater discharge locations but narrower buffers would be allowed at sites lacking groundwater flow paths.

Riparian management strategies often emphasize the effectiveness of forested riparian areas for protecting water quality. However, research over the last two decades reveals that forests are not always the most effective vegetation for removing pollutants. Results can vary between sites, but research has shown that grass buffers (also called vegetative filter strips or grass filter strips) can yield similar reductions in sediments and sediment-borne pollutants (Correll 1997; Hawes and Smith 2004; Dosskey et al. 2010). Grasses and similar plants create a dense vegetative obstacle that slows overland flow, promotes deposition of sediments and attached pollutants, and provides an opportunity for the plants and associated microbes to capture soluble contaminants that enter the soil profile (Dillaha et al. 1989). Filter strips often serve as an effective alternative for protecting water quality from pollutants generated by upland activities where it is impractical to implement forested riparian areas, such as adjacent to agricultural fields, in urban settings, or along highways.

According to Lacas et al. (2005), much of the sediment removal effected by grass filter strips occurs mainly as a result of sedimentation immediately upslope of the strip in an area of still water that builds up against the strip's outer boundary. Furthermore, they note, the deposit formed upslope can expand into the filter strip, and that sediment deposition can increase to the point of forming channels that concentrate overland flow and induce the formation of water pathways with high velocities.

The primary drawback of a vegetative filter strip is that it addresses only pollutant removal and does not provide the other functions of forested riparian areas such as shading, large wood, and bank stability. Furthermore, grasses have a relatively shallow root

structure and thus vegetative filter strips are not as effective in removing pollutants from groundwater. In contrast, trees inherently have a deeper root zone that can effectively intercept subsurface flow and often reach shallow groundwater. Therefore, forested riparian areas can be more effective at removing soluble pollutants in subsurface and groundwater flow through plant uptake and by associated microbial communities that act on the pollutants in the rhizosphere. Considering both situations, structurally diverse riparian areas that contain a combination of grasses, shrubs and trees provide a more robust system for mitigating a range of pollutants (Fischer and Fischenich 2000). A similar concept was proposed by Welsch (1991), who presented a three-zone model that considered an herbaceous filter strip between uplands and the start of the riparian area, followed by a managed forest, and culminating with an undisturbed forest immediately adjacent to the streambank.

Vegetation in riparian buffers also provides a range of phytoremediation processes, wherein plants and associated microbial populations remove, contain, degrade or eliminate pollutants. Investigations on the phytoremediation potential of riparian vegetation to attenuate nutrients have been conducted for some time and results are well documented. The management of vegetation specifically as a pollutant treatment technology for organic compounds and metals has gained acceptance in general over the last couple of decades (Pilons-Smits 2005), but studies on phytoremediation specific to riparian areas remains fairly limited. However, recent research suggests that the promotion of specific plant species to attenuate organic chemicals and metals in riparian areas can be used to treat localized areas of concern (e.g., chemical spills, industrial sites, mine tailings). Design of a phytoremediation treatment system depends largely on the three primary factors identified by Susarla et al. (2002) that govern contaminant uptake and distribution in plants and the surrounding soil system: physicochemical characteristics of the pollutant (e.g., polarity, lipophilicity), environmental conditions (e.g., soil moisture, pH), and plant characteristics (e.g., available enzymes, root structure). Specifics on the phytoremediation potential of different pollutant classes in riparian areas will be discussed later in the respective sections of this chapter, while more detailed descriptions of phytoremediation are readily found in a large number of scientific reviews (e.g., Salt et al. 1998; Pulford and Watson 2003; Pilon-Smits 2005; Sarma 2011).

5.4. Specific Pollutants

For the purposes of riparian area management, we are most interested in five types of water pollutants: sediments, excess nutrients (in particular, nitrogen and phosphorus containing compounds), metals (in particular copper), toxic organic compounds (especially pesticides), and pathogens (especially those related to agricultural animal waste). The physical, chemical, and biological processes through which riparian areas remove these pollutants from water vary tremendously. Consequently, the degree to which riparian areas can remove each of these pollutants, and thereby protect aquatic ecosystems, varies significantly. The following sections describe the complicated processes and mechanisms involved in determining removal efficacy of specific pollutants by riparian areas.

Vegetation in riparian buffers provides a range of phytoremediation processes, wherein plants and associated microbial populations remove, contain, degrade or eliminate pollutants.

5.4.1. Sediments

Sediment transport in streams is a natural process, but excessive sediment loads can significantly degrade water quality. The impact of sediments on aquatic organisms has been researched extensively for many decades, and can consist of lethal, sub-lethal and behavioral effects (Newcombe and MacDonald 1991). Sediments that settle out of the water column can smother gravel and cobble streambeds that are essential for salmonid spawning and habitat for benthic macroinvertebrates and other organisms that form critical links in stream food webs. For example, the filling of interstitial spaces in coarse sediment matrices with fine sediments are thought to reduce or eliminate refuge and foraging habitat for selected life stages of stream-dwelling amphibians (Welsh and Ollivier 1998). Increased turbidity levels, indicative of suspended particles, can elicit physiological stress in fish through gill abrasion, impaired immune function and lowered growth rates (Redding et al. 1987; Au et al. 2004). High suspended sediment loads reduce visibility, which limits fish foraging ability and influences predator avoidance reactions (Redding et al. 1987). Aquatic vegetation and periphyton can be reduced due to diminished light penetration. Sediments also impart indirect effects on aquatic organisms. Elevated turbidity decreases the water albedo (reflectiveness), which increases the fraction of radiant energy absorbed by the water and increases stream temperature, leading to corresponding reductions in dissolved oxygen concentrations. Furthermore, sediments serve as a transport mechanism for other pollutants, carrying attached contaminants from upland sources to the stream channel. Soil particles that harbor legacy contaminants perpetuate water quality problems, such as those caused by DDT in some Washington streams despite this pesticide being banned in 1972 (Ecology 2007).



Restored vegetation in riparian area to capture pollutants in runoff/U.S. Dept. of Agriculture, National Agriculture Imagery Program

While the extent of these detrimental effects is largely a function of concentration and duration, and there is little agreement on the degree of ecological risk in the literature, sediments are a ubiquitous pollutant that many scientists regard as the worst form of pollution in aquatic ecosystems (Newcombe and MacDonald 1991; Waters 1995).

Erosion rates in uplands can be significantly increased by agricultural activities, construction sites, deforestation, and other land uses. Riparian areas effectively remove soil particles carried from upland areas via overland flow by slowing overland flow velocities, promoting sediment settling, and acting as sediment sinks[5]. Mass wasting (also referred to as mass movement, mass failure, or slope movement), wherein large masses of soil and geologic material move downslope into a stream, acts as another potential sediment source in hilly or steep mountainous environments. Although limited in spatial distribution, this geomorphic process can overwhelm the sediment removal capacity of riparian areas.

Our understanding of the riparian area's sediment removal function will be enhanced with a basic understanding of sediment erosion and transport processes. Briefly, the impact of falling raindrops can loosen soil particles via splash erosion. Overland flow picks up soil particles and transports them downslope through sheet erosion. Generation of concentrated flow paths results in rill erosion, which enhances sediment delivery and increases erosion rates through flow that is on the order of a few centimeters deep. Gully erosion develops when deep, narrow channels form, leading to increased erosion and more rapid sediment delivery. It is important to prevent the formation of rill and gully erosion entering riparian areas because channel formation extending into riparian areas short-circuits sediment removal and represents a direct conduit from terrestrial to aquatic systems. Merritt et al. (2003) provide an extensive review of various erosion and sediment transport models that can be employed to determine the potential sediment loads that could enter a riparian area.

While the upland hydrologic regime acts as a principal driver governing the movement of eroded soil particles, the aforementioned erosion mechanisms can be significantly tempered by intact soil cover. This can be accomplished by vegetation overlying a dense cover of herbaceous litter and woody debris. Vegetation increases surface roughness which slows surface flow and enhances water infiltration, both of which promote the settling out of sediments (Figure 5.1). Muñoz-Carpena et al. (1999) showed that spacing between vegetation is the most important parameter in sediment attenuation in riparian buffers, although soil characteristics, sediment load, and slope also play prominent roles.

Agriculturally generated nitrogen continues to present an issue, and it is becoming increasingly apparent that smaller hobby farms and lawn fertilizers used in suburban and urban areas can lead to severely degraded water quality.

[5] Streambank erosion, channel incision, and surface erosion in riparian areas present other potential sediment sources. As this chapter focuses on the removal of pollutants generated by upland activities, these geomorphological processes are outside the scope of this chapter. However, it should be noted that riparian vegetation can increase bank stability, thereby decreasing erosion along the stream channel (see Chapter 2).

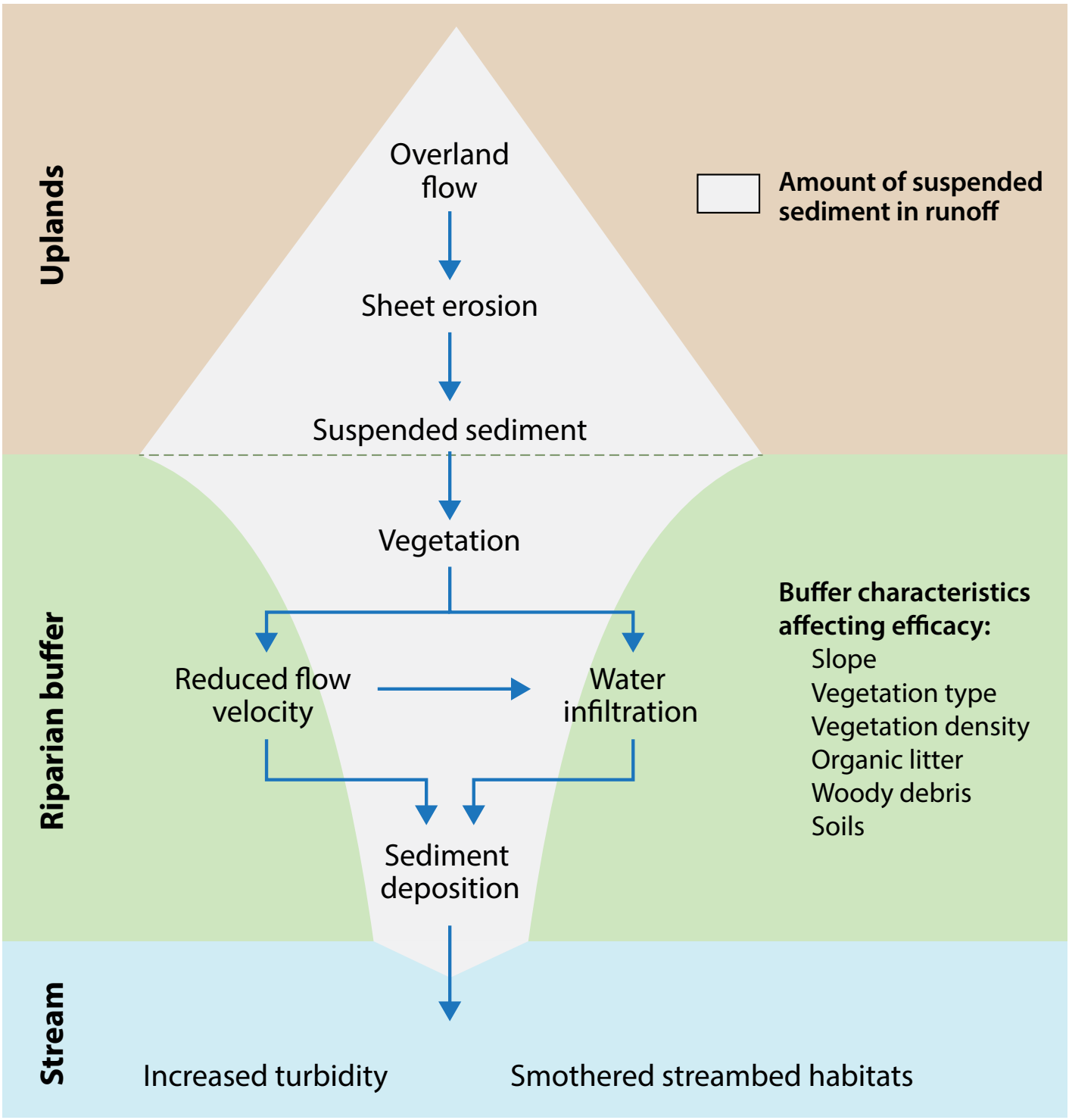


Figure 5.1 Efficacy of riparian buffer in removal of sediment from runoff. The amount of suspended sediment in runoff increases through sheet erosion of upland soils. Vegetation, woody debris, and organic litter in riparian buffer reduce flow velocity. Reduced flow velocity and increased water infiltration into soils causes deposition of suspended sediments. Sediments not removed from runoff increase turbidity and can smother gravel or cobble streambed habitats.

Riparian buffer widths required for sediment attenuation vary considerably depending on the site-specific conditions (e.g., slope, area of adjacent uplands, drainage paths, vegetation density). Sediment particle sizes are also a consideration in buffer width design – larger particles are deposited within the first 10 to 33 ft (3 to 10 m) of a buffer but smaller particles settle out at greater distances (Sheridan et al. 1999; Syversen et al. 2001; Dosskey et al. 2002; Yuan et al. 2009). The potential quantity of overland flow should also be a consideration when determining buffer widths, and hence, upland area should also factor into the determination of buffer width. Leeds et al. (1994) suggested that on agricultural lands the ratio of field drainage area to buffer area should be no greater than 50:1, and for consistently higher water quality the ratio should be on the order of 3:1 to 8:1. From research conducted on forested lands undergoing timber harvest, Clinton (2011) concluded that leaving a forested riparian buffer of 33 ft (10 m) would sufficiently reduce sediment transport to the adjacent stream, assuming responsible timber harvest practices, although greater widths have been recommended depending on the circumstance (Castelle et al. 1994). Furthermore, the relationship between buffer width and sediment attenuation is non-linear, necessitating a disproportionate increase in width to achieve an incremental increase in sediment removal. This relationship was described in a literature review of research on riparian buffers conducted by Sweeney and Newbold (2014). They concluded that a sediment removal efficiency of about 65% is typical for 30 ft (10 m) buffers but an 85% removal efficiency required more than twice that width, about 100 ft (30 m).

5.4.2. Excess Nutrients

Excess nutrients, in this context referring specifically to nitrogen and phosphorus, have long been recognized as significant water quality impairments. Eutrophication, the nutrient enrichment of aquatic systems, promotes algal blooms that shift community structure. Subsequent bloom die off leads to oxygen deficiency in the water column as oxygen is consumed by microorganisms during the decay of the excess organic matter. Hypoxia can have devastating consequences on aquatic animal communities, killing immobile organisms (e.g., clams) and mobile species (e.g., fish) that are not able to escape the deoxygenated zone. Excessive accumulation of cyanobacteria (formerly known as blue-green algae), resulting from shifts in nutrient ratios in the water, can release cyanotoxins which can cause dermal reactions, gastroenteritis, liver and kidney poisoning, and neurological impacts in humans or animals following water contact. Canine deaths due to cyanotoxin exposure have been confirmed throughout the country, with Washington reporting the highest number of cases among 27 states (Backer et al. 2013). In some cases, selected nutrients are toxic at concentrations within typical fertilizer application ranges. For example, embryos of the highly aquatic Oregon Spotted Frog *Rana pretiosa*, a federally threatened species in the Pacific Northwest, all died after 15-day exposure to nitrite (NO_2^-) concentrations lower than 2 mg/L (Marco et al. 1999).

Fertilizers and manures are major sources of excess nutrients entering riparian areas. Wastewater discharges and leaking septic tanks introduce nutrients to riverine systems, but those sources fall outside the scope of this review. Agricultural activities have long been blamed as the biggest nonpoint source for nutrients. The enormous contribution of phosphorus to the eutrophication of surface waters led to extensive promotion of various best management practices (BMPs)[6] for reducing off-field transport of phosphorus. Nevertheless, there has been a general lack of improvement in water quality of many receiving

6 In general usage "best management practice" (BMP) means one or more practices that are determined to be an effective and practicable means of preventing or reducing the amount of pollution generated by nonpoint sources to a level compatible with water quality goals. Under Washington State regulations, BMP means physical, structural, and/or managerial practices approved by the Washington Department of Ecology that, when used singularly or in combination, prevent or reduce pollutant discharges (WAC 173-201A-020).

streams. In addition to existing agricultural sources of phosphorus, it is increasingly evident that "legacy phosphorus" from past activities that accumulated in watersheds contributes to current water quality problems (Jarvie et al. 2013). Agriculturally generated nitrogen continues to present an issue, as it can leach through the soil and move with shallow groundwater flows through riparian soils and enter receiving waters. It is also becoming increasingly apparent that smaller hobby farms and lawn fertilizers used in suburban/urban areas can lead to severely degraded water quality (Cheng et al. 2014).

For a thorough discussion of nitrogen and phosphorus dynamics in natural, undisturbed riparian areas see Chapter 6. For this chapter it is salient to note the differing biogeochemical cycles exhibited by nitrogen and phosphorus: nitrogen displays complex transformations between various species including atmospheric forms whereas phosphorus undergoes relatively simple shifts between soluble, sorbed, precipitate and organic forms. Nitrogen and phosphorus are often casually grouped together as nutrients, but this discrepancy in chemical behavior leads to significantly different considerations when assessing their removal by riparian areas.

Nitrogen

Due to its soluble nature in its aqueous forms, a significant portion of the excess nitrogen entering streamside areas will enter riparian soils either through infiltration or via groundwater transport. Nitrogen then can undergo attenuation through a variety of mechanisms. It is widely accepted that denitrification acts as the primary pathway for removing nitrate (NO_3^-) from water in riparian areas (Fennessy and Cronk 1997; Cey et al. 1999; Wang et al. 2014). This process is governed by specific denitrifying bacteria that use nitrate during anaerobic respiration, reducing it to the gaseous forms of nitric oxide (NO) and nitrous oxide (N_2O) and ultimately molecular nitrogen (N_2). These gaseous species can then volatilize in harmless forms to the atmosphere and be completely eliminated as a potential pollutant. This process requires the presence of a shallow water table, anoxic conditions, denitrifying bacteria and an available carbon source—conditions commonly associated with riparian areas. Hydric soils, despite occupying a limited area within riparian areas, are important sites of anaerobic activity that promote denitrification. If groundwater bypasses riparian soils then nutrient pollution of surface waters may occur despite the presence of a riparian buffer (Burt et al. 1999). In a highly cited critical review of research on nitrate removal in riparian areas, Hill (1996) asserted that understanding denitrification requires a better understanding of groundwater interactions with riparian vegetation and soils.

Plant uptake of dissolved nitrogen in subsurface flows moving through riparian areas provides an additional mechanism that can remove considerable amounts of nitrate. A significant difference from denitrification though is that vegetative uptake is often viewed as transient storage for nitrogen because nitrogen assimilated by plants will be reintroduced to the ecosystem following leaf senescence or plant death. Both grasses and trees have been widely shown to remove nitrogen in riparian areas, but studies have yielded contradictory observations and conclusions regarding which vegetation type is more effective (Groffman et al. 1991; Osborne and Kovacic 1993; Schnaebel et al. 1997). A meta-analysis performed to assess the key riparian variables responsible for nitrogen removal concluded that forested buffers exhibited the greatest propensity for nitrogen uptake, and surpassed the efficacy of both grasses and communities composed of both trees and grass (Zhang et al. 2010). Although this study did not end the debate, many researchers believe that deeper and more expansive root structure allows trees to take up greater proportions of nitrogen. A riparian area's age may also be a variable affecting nitrogen removal. Cors and Tchon (2007) evaluated denitrification enzyme activity in two

riparian areas of different ages: 6 and 20 years old. They found the older system was significantly more effective at denitrification, which was attributed to a greater accumulation of carbon.

Research focusing on hot spots and hot moments has provided a more nuanced understanding of nitrogen dynamics in riparian areas. Hot spots and hot moments that develop in the hyporheic zone are increasingly being recognized as a contributing mechanism to nitrogen attenuation (McClain et al. 2003; Vidon et al. 2010; Gu et al. 2012). A landmark paper by Hedin et al. (1998) exemplified the concept of enhanced nitrogen removal at hot spots along the soil-stream interface in a mixed forested-agricultural watershed. A first-order stream exhibited two converging primary flow paths, one consisting of shallow subsurface flow containing high concentrations of chemical reducers (i.e., dissolved organic carbon, CH_4, and NH_4^+) and the other a near-stream upwelling of deep groundwater containing high concentrations of oxidizers (i.e., NO_3^-, N_2O, and SO_4^{2-}). A zone of high denitrification resulted that was less than 3 ft (1 m) wide and remained active for the two-year study period. Hedin et al. (1998) suggested that nitrate removal via denitrification could be sustained depending on the spatial location of high flow pathways, the propensity of the chemical environment to support rapid denitrification, and the availability of oxidizable carbon. Furthermore, they recommended that management actions enhancing natural carbon inputs could be adopted to optimize nitrate removal by denitrification.

Phosphorus

Unlike nitrogen, phosphorus possesses a binding affinity for soil particles and typically enters riparian areas adsorbed to soil particles carried by overland flow. Hence, phosphorus removal is closely connected to sediment removal by riparian areas. A comprehensive review of phosphorus dynamics in grass buffer strips surmised that that optimum phosphorus retention occurs in filter strips that are at least 16 to 33 ft (5 to 10 m) wide (Dorioz et al. 2006), but this recommendation is debatable. It is generally recognized that a positive correlation exists between buffer width and phosphorus retention in riparian areas, and hence, buffers greater than 33 ft (10 m) offer greater removal efficacy. Independent studies have consistently found 60% to 80% phosphorus removal by buffers roughly 15 to 53 ft (4.6 to 16.3 m) wide (Dillaha et al. 1989; Vought et al. 1994; Lee et al. 2003). Forested riparian ecosystems assessments have yielded less consistent results, with studies showing phosphorus removal ranging from 30% to 80% in deciduous riparian areas (Lowrance et al. 1984; Cooper and Gilliam 1987). This discrepancy corresponds with the premise that a robust stand of grass provides better attenuation of sediments and associated pollutants than forested riparian areas.



Unknown species of crayfish in the Deschutes River/Steve Boessow, WDFW

Even though these results appear convincing at first glance, a significant proportion of the body of research consists of short-term studies that fail to account for changes in riparian function over time. While it can confidently be stated that riparian areas offer effective short-term control of sediment-bound phosphorus, uncertainty exists regarding their long-term efficacy. Filter strips receiving sediment loads are well known to become less effective over time due to internal erosion and sediment accumulation. The continual incorporation of phosphorus into surface soils presumably would lead to a saturation of the system that could not only decrease removal of new phosphorus entering the

riparian area, but also lead to release and export of dissolved phosphorus to the stream that had previously been stored in riparian soils (Muscutt et al. 1993). Some studies have reported significant removal of soluble phosphorus in surface runoff (Peterjohn and Correll 1984). However, contradictory reports indicate little retention of soluble forms, with the majority moving through the area in surface runoff (Daniels and Gilliam 1996). Plants take up some of the phosphorus in the riparian soils, but this mechanism is not nearly as significant in removal as it is for nitrogen. Increased removal of soluble forms could potentially be achieved with various amendments, such as biochar (charcoal used as a soil amendment), that could enhance phosphorus sorption (Zhang et al. 2014).

A relatively new research topic related to phosphorus attenuation focuses on subsurface transport of soluble phosphorus forms. It was long accepted as dogma that phosphorus did not leach or move through the soil profile. Although scattered findings contradicted this view during the preceding decades (e.g., Peverill et al. 1977), this conviction remained recalcitrant and was still taught in university soil courses up until the last decade. This belief has now been dispelled by increasing evidence that phosphorus can move through the soil profile, particularly in coarse textured soils. A preponderance of the recent research on this topic has been conducted in upland soils, but the findings are relevant for riparian areas and are particularly true in coarse alluvial soils. This has been demonstrated by the rapid transport of soluble phosphorus forms through preferential flow paths (Fuchs et al. 2009). This movement can serve as an important transport mechanism that should be considered when determining potential phosphorus fluxes reaching the stream channel. Although extensive literature exists on phosphorus cycling in a variety of settings, relatively little information is available on phosphorus dynamics in the hyporheic zone and further research is needed to understand phosphorus flux through this interface between the stream and groundwater flowing through riparian areas (Zhang 2014).

While it can confidently be stated that riparian areas offer effective short-term control of sediment-bound phosphorus, uncertainty exists regarding their long-term efficacy. Riparian filter strips are well known to become less effective over time.

5.4.3. Metals

Metals (as well as metalloids that share similar properties, such as arsenic) are elements naturally found in geologic material. They enter the environment either through natural weathering processes or through anthropogenic activities. Localized metal deposits can result in elevated concentrations in streams that can be hazardous to biota. Metal pollution in aquatic ecosystems appeared as a serious environmental issue on a wide scale in the late 19th and early 20th century due to increasing industrial and mining activities. Contamination sources have grown over time to include a range of other activities, the most pertinent to this discussion on riparian areas being runoff from urban and agricultural lands. While mining activities present significant metal inputs into certain streams in Washington, protecting water quality from these sources requires the implementation of specific remediation techniques that are outside the scope of this chapter.

Metals present a significant environmental hazard that can lead to a variety of health issues in plants and animals. While some metals are essential elements required for normal growth and development of biota, these can also impart toxicological issues when concentrations exceed a given threshold. Among other health effects, metals can be carcinogenic, cause reproductive problems, and interfere with the normal function of the heart, bones, intestines, and kidneys. While debate continues over the specific mechanisms associated with metal toxicity in plants, it is generally recognized that oxidative stress represents a primary driver that results in cellular damage (Pinto et al. 2003). Some heavy metals bioaccumulate and biomagnify, which leads to elevated concentrations exhibited at higher trophic levels (Boening 2000). The propensity for metals to bioaccumulate can be magnified by biologically mediated transformation into organometallic complexes, such as methylmercury. Metal toxicity is often related to the chemical species formed, which often relates to their bioavailability. For instance, chromium(III) compounds are not considered a significant health risk while chromium(V) is a well-known carcinogen. Similarly, metal complexation with dissolved organic carbon often inhibits their bioavailability.

While copper's detrimental environmental impacts have been recognized for many decades (Sprague and Ramsay 1965), it has received increased attention in recent years as toxicity symptoms have become more pronounced. Copper is an essential mineral for organisms, contributing to enzymatic and metabolic function, but toxic effects have been observed at all levels of the aquatic food chain when it exceeds particular concentrations. Copper has been shown to have detrimental effects on plants, retarding growth at concentrations as low as 1.0 part per billion (ppb) and impeding photosynthesis at 5.0 ppb levels (USEPA 1980). While reductions in algal production can theoretically exert an indirect effect on zooplankton by limiting their food source, copper can impart a lethal effect on these organisms at low parts per billion levels (Ingersoll and Winner 1982). Similarly, significant mortality has been shown to occur in benthic macroinvertebrates at similar copper



Juvenile salmon need clean water/Ned Pittman, WDFW

concentrations (Clements et al. 1992). Copper presents a litany of issues to fish. Lethal concentrations vary considerably between fish species and fluctuate depending on environmental conditions. Sub-lethal effects are conveyed at lower concentrations, which include hindering osmoregulation, weakening immune response, altering enzymatic and metabolic activity, impairing olfaction (sense of smell), altering migration patterns and predator avoidance behavior, and modifying hatch rates (Lortz and McPherson 1977; Sorensen 1991; Rougier et al. 1994; Baldwin et al. 2003; Monteiro et al 2005; Sandahl et al. 2007; McIntyre et al. 2012). Synergistic impacts that occur when copper is present in combination with other pollutants highlights the current concern over this element (Hecht 2007). Effects similar to those observed in fish have been recorded in amphibians following exposure to rather low concentrations of copper ions (Cu^{2+}). For example, the concentration of copper at which half of larval Northern Leopard Frogs *Rana pipiens* would die following a seven-day exposure was estimated at 0.067 mg/L (Redick and La Point 2004). The same study revealed lethargy, loss of equilibrium, and loss of appetite at copper concentrations of 36 ppb. A widespread pattern in copper exposure studies with amphibians is a general impairment of predator evasion behaviors (Garcia-Muñoz et al. 2011).

Anthropogenic copper inputs to the environment include those of other metals, but what sets copper apart are two significant sources. The first is the agricultural use of copper-based pesticides. Copper sulfate and other copper-based pesticides are frequently used as a fungicide to protect a variety of crops, including fruits and potatoes. The second is the release of copper from vehicle brake pads. This unique source has received considerable attention as an environmental hazard worldwide, and has led to the 2010 adoption of Washington State's Brake Material Friction Act (RCW 70.285) that is phasing out copper in automobile brakes (Straffelini et al. 2015). Copper can also enter the environment through atmospheric deposition, which is a potential pathway in industrial and mining regions (USEPA 1980). These sources introduce copper into the environment as a nonpoint source pollutant, which makes copper very different from other metals. While the following discussion will continue to refer to metals in general, the reader should recognize that the nonpoint source nature of copper makes it the primary metal of concern in Washington in regards to attenuation in riparian areas.

Metals form various inorganic and organic species, the nature of which directly relates to its bioavailability and mobility through a riparian area. Metal speciation is driven through complex biogeochemical processes. Environmental conditions and the chemical nature of the surrounding constituents play a significant role in dictating the form that a metal might take. This is particularly relevant to riparian areas where fluctuating water tables alter redox conditions, and correspondingly metal dynamics in riparian soils. Daily oscillations related to the photocycle, for instance, have been shown to occur in aquatic ecosystems as a result of biogeochemical interactions involving temperature, acidity, and biofilms (Nimick et al. 2011). Consequently, zinc, manganese, and cadmium can increase several-fold between late afternoon and early morning. In contrast, arsenic undergoes the opposite diel pattern; meanwhile copper and lead do not undergo regular diel cycling.

The metal species resulting from soil acidity and redox conditions can form precipitates, exhibit an affinity to clay minerals and oxide/hydroxide compounds, and thus be more readily retained in riparian areas. Conversely, metals stay in solution as more mobile forms that leach and move toward the stream. Typically, metals more readily enter solution under acidic conditions. Meanwhile the ionic strength of the water (a measure of the concentration of all the ions in solution) presents a confounding variable in these processes. The impact of other ions manifests through enhanced metal desorption from soil particles with increasing

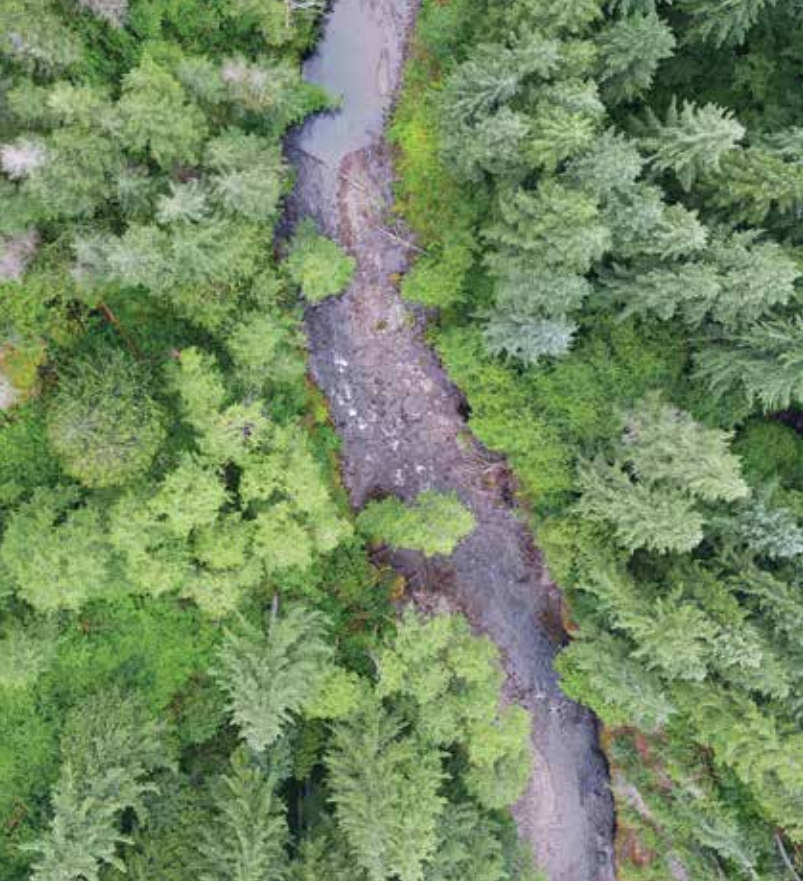
salinity. Carbonates in riparian soils promote metal retention by buffering acidity (i.e., preventing increased acidity), limiting metal solubility, and forming insoluble precipitates with metals.

Organic constituents in soil-water systems also play a major role in metal fate and transport processes. It has been clearly understood for some time that humic substances, a classification of complex and heterogeneous macromolecules that represent a substantial component of natural organic matter, have the capacity to bind significant amounts of metals (Reuter and Perdue 1977). While association of metal ions with soil organic matter can retain metals, humic substances can act as colloids and contribute to colloid-enhanced movement. The environmental factors and mechanisms involved in metal-humic interactions are multifaceted, but it is salient to recognize the impacts that organic matter in riparian soils can have on the movement of metals to the stream channel. A more detailed explanation of the inorganic and organic factors that influence metal behavior is presented in a review by Du Laing et al. (2009), which includes a specific focus on riparian areas.

Unlike organic contaminants that can degrade, metals are recalcitrant and removal in riparian areas depends largely on retention. Although the brief description of metal chemistry provided here elucidates the primary factors that affect their movement in the environment, management practices to enhance their attenuation are limited, and metal mobility will be driven overwhelmingly by environmental conditions. An exception to this statement is phytoremediation.

Phytoremediation of metals offers promise as a means to enhance metals removal in riparian areas. Although significant research on this process did not start in earnest until the late 1990s, since then hundreds of scientific papers have been published on the topic. Correspondingly, there is a plethora of review articles (e.g., Ghosh and Singh 2005; Sarma 2011; Koptsik 2014; Laghlimi et al. 2015). Four classes of phytoremediation can influence metal attenuation in soil, including phytoextraction (removal of metals from the soil-water system by plants), phytostabilzation (minimizing metal transport and sequestering them in the soil near the roots), phytovolatilization (uptake and transpiration by plants; this process is primarily limited to mercury and arsenic), and rhizofiltration (sorption, concentration and precipitation of metals in the root mass). Of these, the first two mechanisms are the most effective in attenuating metals (Laghlimi et al. 2015). In general, trees are a more effective form of vegetation due to their size, perennial nature, and the depth of root growth. Different metals will accumulate in different parts of a tree. For instance, copper tends to be immobilized and retained principally in the roots while zinc moves into the branches and leaf mass (Pulford and Watson 2003). Some plant and tree species act as hyper-accumulators that are tolerant of high metal concentrations in soils and can amass metals in their tissues through detoxification mechanisms (Sarma 2011). These species could be preferentially planted in areas where metals are a particular concern to help attenuate metal movement to the stream channel. As leaves will fall to the ground, riparian management could include the periodic removal of vegetative debris to off-site locations to avoid subsequent movement to the stream. Often there is no need to plant nonindigenous plants as a variety of common native riparian vegetative species can provide phytoremediation capabilities. For instance, willows (*Salix* spp.) have been shown to attenuate various metals in riparian areas to great effect (Bourret et al. 2009; Zhongmin et al. 2012).

Soil amendments offer another form of "green remediation" that has been increasingly used in soil systems since the turn of the century. A wide variety of amendments can be used either to mobilize metals by promoting uptake via phytoextraction or to immobilize (stabilize) metals in a solid phase. For instance, chelating agents have been applied at sites around the globe to enhance desorption, while phosphate



Tilton River/George Fornes, WDFW

fertilizers are common amendments intended to intensify metal sorption and form precipitates. Several topical reviews describing assorted soil additives have been published that provide more detail on this *in-situ* remediation technique (e.g., Bolan et al. 2014; Mahar et al. 2015). Similarly, over the last decade biochar has seen increased application in the context of attenuating metals (Ahmad et al. 2014). Although studies on the use of soil amendments to attenuate metals in riparian soils are limited, recent findings showed that additions of 11 different materials, such as biochar, bentonite, cement bypass kiln dust, and limestone to a floodplain soil could provide a potential remediation technique (Rinklebe and Shaheen 2015). An evaluation of the amendments in riparian soils heavily contaminated with copper (over 3,000 mg/kg) showed that most of the additives shifted the geochemical forms of copper through either increased sorption or by transformation to more plant available forms. Although the authors concluded that the low amendment rates that could practically be applied would inadequately immobilize copper, the increased copper concentration found in grass tissues at the same site indicates a means of enhanced phytoremediation.

Clearly, the use of soil amendments requires further field verification in riparian areas, but this approach to enhancing natural attenuation mechanisms shows promise.

5.4.4. Pesticides and Other Organic Compounds

An extensive array of organic contaminants exists in the environment that can threaten water quality in aquatic ecosystems. This category of compounds describes molecules that contain carbon covalently bonded to other elements, and includes both naturally derived and synthetic chemicals. This chapter focuses on anthropogenic compounds that exert a toxic effect on aquatic organisms.

The multitude of organic chemicals makes it impractical to touch on each class here, but common examples that present environmental health risks in aquatic habitats include polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and pesticides. While the detrimental effects of many of these pollutants have been recognized for some time, studies continually identify emerging contaminants of concern ("emerging" does not only connote new compounds, but also chemicals that have been in use without realizing the extent of their toxicity). For instance, hazards associated with flame retardants, such as polybrominated diphenyl ethers (PBDEs), have been highlighted over the last decade (Covaci et al. 2011; Ye et al. 2015). Recent research emphasis also has been placed on a variety of trace organic compounds, including pharmaceuticals and personal-care products (PPCPs), as it is now recognized that these chemicals can exert negative impacts on fish and other aquatic organisms at both the individual and population levels even at extremely low (e.g. parts per trillions) concentrations (Mueller 2004; Kümmerer 2009a; Kümmerer 2009b; Luo et al. 2014). In addition, there is growing awareness that while individual pesticides may have little or no effect

when examined alone, that same pesticide as part of a pesticide mixture may be lethal to amphibians (Hua and Relyea 2014).

While only a brief discussion was provided above on the various organic pollutants that act as environmental contaminants, a little more information on pesticides is warranted, as they are more likely to be used in uplands and transported into riparian areas. Pesticides consist of any substance that is used to control fungal, plant, or animal pests. These chemicals represent a broad range of different chemicals that are derived from various sources such as plant extracts (nicotine, pyrethrum, neem oil), inorganics (e.g., copper sulphate; inorganic pesticides will not be discussed here), and synthetics. Synthetic pesticides are themselves a broad class that includes legacy organochlorines (chlorinated hydrocarbons such as DDT), organophosphates (e.g., Malathion), phenoxyacetic acids (e.g., MCP), carbamates (e.g., carbaryl), and neonicotinoids (e.g., imidacloprid). Pesticide pollution of streams can impact non-target organisms resulting in a wide variety of physiological and ecological problems (Mann et al. 2009), including altered growth (Alvarez and Fuiman 2005) and reproduction (Moore et al. 2007), altered community dynamics (Fleeger et al. 2003), and the loss of species (Relyea and Diecks 2008).

The ecological impacts of organic pollutants on aquatic organisms vary considerably, depending on not only the contaminant type but also the environmental conditions. Various compounds can be carcinogenic (causing cancer), mutagenic (altering genetic material and fomenting mutations), and teratogenic (stimulating abnormalities). Organic pollutants can also act as endocrine disrupting chemicals (EDCs), adversely impacting development, reproduction, neurologic, and immune system function in humans and wildlife (Colborn et al. 1993). Endocrine disruption has emerged as a key issue as studies have identified more cases of detrimental impacts, such as the discovery of atrazine-induced feminization of male Northern Leopard Frogs at very low concentrations (Hayes et al. 2003). This finding is controversial, but it has increased awareness that many organic compounds have potentially unrecognized endocrine-disrupting effects. Some organic contaminants, such as halogenated hydrocarbons, are capable of bioaccumulating in individuals and biomagnify up the food chain (Rahman et al. 2001).

To further complicate potential risk, pesticides rarely occur singly in aquatic environments. For example, a comprehensive decadal assessment of 178 streams in agricultural, urban, and mixed-land use watersheds found two or more pesticides more than 90% of the time and ten or more pesticides 20% of the time (USGS 2006). Ecological and toxicological research is increasingly recognizing the complexity of contaminant mixtures, which may have antagonistic, additive, or synergistic interactions in biota (Cedergreen 2014). For example, combining the pesticides diazinon and Malathion inhibits brain activity, and therefore swimming performance in fish at concentrations more than 50 times lower than the concentrations that cause an impact when these pesticides are used singly (Laetz et al. 2013). Although the examples given focused on pesticides, mixtures of hydrocarbons originating from roadways, parking lots and other locations can also be found in urban watersheds, including pollutants such as PAHs that originate from coal-tar-sealed parking lots (Scoggins et al. 2007). Amalgamations of these urban generated organic contaminants have been shown to impart both sub-lethal and lethal effects on aquatic organisms and disrupt stream communities (PSAT 2007; Scoggins et al. 2007; Spromberg et al. 2016).

The sheer number of different sub-classes of pesticides makes it impractical to provide information on the chemical behavior of all the potential contaminants that might be encountered in riparian areas. Pesticide pollution is extremely complex due to the multitude of types, the wide range of molecular sizes, the diversity of chemical structures, and the ability of these compounds to react and transform into new products. However,

some basic information on organic compounds will enable a better understanding of the effects riparian buffer size and structure have on pesticide pollutants. It is essential to identify the physicochemical properties of organic contaminants to adequately assess fate and transport pathways through riparian areas. Specific gravity, water solubility, vapor pressure, and partitioning coefficients such as the octanol/water partition (log K_{OW}) and organic carbon partition coefficients (K_{OC}) all serve as predictors of a substance's potential mobility and attenuation in riparian areas.

Natural organic matter has a significant impact on the degree of attenuation riparian soils impart on pesticides. The aforementioned K_{OC} represents the ratio of the amount of chemical adsorbed to the soil to the amount of chemical that remains in solution, related to the mass fraction of organic matter in the soil (Delle Site 2001). This value essentially indicates the affinity of a pollutant to soil organic matter and is a predictor of its potential mobility through the soil, where higher K_{OC} values correlate to less mobile organic contaminants and low K_{OC} values correlate to more mobile organic contaminants. Hydrophobic, nonpolar compounds, such as PAHs, are typically associated with particles in soil-water systems, whereas polar contaminants often exist in dissolved forms that exhibit a greater propensity for movement through the ecosystem.

The relationship between pesticides and their respective K_{OC} values can be confounded by humic substances, which are a heterogeneous mixture of chemically complex macromolecules that comprise a substantial component of natural organic matter. Humic substances have long been known to exert a significant impact on the movement of organic contaminants (Hayes 1970; Khan 1972). These amorphous compounds, which are classified into humic acid, fulvic acid, and humin fractions based on their molecular size and chemical behavior, can effectively bind organic pollutants and present either water-insoluble entities that are retained in the soil column or water-soluble colloids that can facilitate transport through riparian soils to the stream channel. Even when present in small quantities, these chemically reactive compounds can dramatically influence the binding, persistence, and translocation of organic pollutants. The interactions between humic substances and organic contaminants are beyond the scope of this chapter, but their potential to affect K_{OC} values by up to an order of magnitude is salient to predicting their attenuation by riparian buffers (Grathwohl 1990; Kopinke et al. 2001). Nevertheless, in general the attenuation of organic pollutants in riparian areas is positively correlated with soil organic matter.

Pesticides and other organic pollutants can also be retained in riparian areas through sorption to mineral components in the soil, although often to a lesser extent than to organic matter (Delle Site 2001). The surface area of soil particles enhances the binding of organic pollutants, which increases with finer soil textures such as those found in clays. The mineral composition of the soil particles also influences binding affinity by offering different forms of attachment sites. Those compounds that do not attach to soil material are susceptible to leaching, which can result in them entering the groundwater and being transported to the stream. Contaminants associated with inorganic particulates are usually much less bioavailable, although they can become bioavailable if particles are ingested by biota (Moermond et al. 2004).

Pesticides and other organic pollutants can undergo abiotic and biotic transformations that further compound the complexity of their chemistry. Abiotic processes include degradation due to chemical reactions such as hydrolysis (Mitchell et al. 2014; Mitchell et al. 2015). Biotic transformations include biologically mediated reactions, such as bacterial metabolism. Although the potential for biodegradation is dependent on the chemical structure of the contaminant, indigenous soil bacteria can use many organic compounds as a metabolic substrate. Repeated exposure to the same type of pesticides can foster microbial communities that

become contaminant specialists (Vidon et al. 2010). For example, soils receiving repeated applications of the pesticide 2,4-D harbor more 2,4-D-degrading microbes than similar plots receiving fewer applications (Gonod et al. 2006). Similarly, PAH-degrading bacteria were more abundant in rain gardens receiving stormwater runoff than upland control plots (LeFevre et al. 2012). The robust microbial communities found in riparian areas, resulting from conditions discussed previously, helps attenuate many organic compounds in riparian soils. Being biologically mediated, however, the degradation rates will fluctuate seasonally depending on temperature and soil moisture.

Phytoremediation by riparian vegetation provides an additional attenuation mechanism for organic contaminants. Although phytoremediation has received significant interest over the last two decades, the literature contains few papers on this method specific to pesticides in riparian areas. However, the principles are the same as those described in the vegetation section found earlier in this chapter, and presumably the results would be similarly positive. This premise was highlighted in a review article on the potential effectiveness of phytoremediation in riparian areas, where Karthikeyan et al. (2004) drew on similarities between streamside areas and other locations where phytoremediation has been effectively employed to treat pesticide-contaminated soil and water. Similarly, another review paper summarized a range of studies that investigated phytoremediation in aquatic settings, addressing plant species such as cattail (*Typha* spp.) and Cutgrass *Leersia oryzoides* which can be found along the riparian-aquatic ecosystem transition (Moore et al. 2011). A study directly examining the use of phytoremediation in riparian areas found that Tussock Sedge *Carex stricta*, Switchgrass *Panicum virgatum* and Gamagrass *Tripsacum dactyloides* led to approximately 70% reduction in total petroleum hydrocarbons under controlled riparian conditions, while there was only about 20% reduction associated with a Narrowleaf Willow *Salix exigua* and poplar (*Populus* spp.) (Euliss 2008). Following the same procedure in an uncontrolled riparian field site did not reproduce these promising results, but the authors presumed there was a continuous pollutant source re-contaminating the site during the study. A field study examining the phytoremediation potential of willows (*Salix* spp.) in riparian areas yielded a 49% decrease in PCB concentrations before contaminated groundwater reached the stream margin (Skłodowski et al. 2014). Although there is not enough information available in the literature to provide design guidelines for implementing a phytoremediation-based system, there is promise in this approach to attenuating organic contaminants in riparian areas and further research should be encouraged.

Mycoremediation, the degradation of contaminants by fungi, is a type of bioremediation that occurs in soils. This process likely takes place in riparian soils with high organic matter content where lignin-degrading fungi (more commonly known as wood-decay fungi, a class that includes brown rot, soft rot, and white rot) exist. These microorganisms possess the ability to breakdown organic contaminants, particularly PAHs, through the release of a variety of oxidizing enzymes (Haritash and Kaushik 2001). Research on promoting lignin-degrading fungi as a remediation agent started to appear in

The central problem faced by resource managers is determining the adequate riparian buffer width, composition, and structure to protect water quality with high degrees of efficacy, efficiency, and certainty.



Spawning Chum Salmon Oncorhynchus keta*/Ned Pitman, WDFW*

the literature in the 1990s, but did not receive much attention until after the turn of the century (Lamar et al. 1993; Boonchan et al. 2000; Canet et al. 2001). Results vary considerably, but it is not uncommon to observe 50% to 90% reductions in organic pollutants resulting from mycoremediation-mediated degradation (Lamar et al. 1993; Boonchan et al. 2000; Haritash and Kaushik 2001). Although this degradation process is mentioned here to highlight the mechanisms affecting organic pollutants in riparian soils, it has been suggested that mycoremediation could potentially be capitalized on as an engineered mitigation technique in riparian areas, but more research is needed (Jones 2009).

Despite the large body of knowledge that has been developed, the mechanistic understanding of pesticide transport through riparian areas is incomplete. The following summarizes our understanding of the typical transport pathways of a pesticide; this is essential information to consider when determining appropriate riparian widths for attenuation. Pesticide migration from terrestrial sources to stream channels can follow a number of different pathways. The specific transport mechanism governing pesticide movement from uplands through riparian areas and into surface waters is highly correlated to the type of pesticide in question. Surface runoff can carry pesticides off fields as either dissolved forms or attached to eroded soil particles. Leaching of compounds entails their vertical movement through the soil, after which they can either move toward the stream through the unsaturated zone or via groundwater flow. The chemicals that move in the dissolved form tend to be those that exhibit low to moderate sorption properties, as compounds that possess lower partition coefficients are prone to leach into the soil profile. Leaching is further promoted in regions with high precipitation and in soils that are coarse-textured, contain a low percentage of organic matter, or demonstrate a high degree of macropore flow. Pesticides that predominantly follow sediment-facilitated transport are generally those that display a strong affinity to soil particles (i.e., K_{OC} > 1,000 L/kg).

While the literature lacks information on the potential attenuation in riparian areas for most organic pollutants, there are a substantial number of papers on the movement of pesticides through buffer strips. A number of review papers evaluate pesticide attenuation in riparian areas, with a particular emphasis on managed vegetative filter strips (Krutz et al. 2005; Lacas et al.

2005; Reichenberger et al. 2007). Due to the complexity of the attenuation mechanisms involved, the removal rates within buffers vary considerably between disparate compounds, as well as when comparing the removal rates of the same pesticide at different locations. Depending on the conditions, mass removal rates for some pesticides can be negligible while others can reach 100%. Research has shown that herbicide type and filter strip width are primary factors affecting herbicide retention in riparian areas, while antecedent moisture conditions exert an additional effect wherein pesticide attenuation is generally negatively correlated with soil moisture. The type of vegetation appears to have negligible impact on pesticide retention, with studies showing that a grass-shrub-tree mixture exhibited comparable mitigation as grass only. Interestingly, one study found that pesticide mitigation was greater at higher incoming concentrations, which was attributed to better sorption to soil and plant material (Misra et al. 1996).

Due to confounding and often conflicting results, after 35 years of research, there remains a lack of consensus on the minimum filter strip widths needed for effective pesticide removal from surface and surface overland flow. The NRCS recommends a standard width of 49 ft (15 m) with the aim of achieving 50% effectiveness, but there is not much evidence to support this guidance (NRCS 2000). Another general recommendation for diffuse runoff suggests riparian widths of 33 and 66 ft (10 and 20 m) for hillslopes of under and over 328 ft (100 m) in length, respectively (Lacas et al. 2005). However, because this recommendation is based on only one experimental study, it may not be applicable to other locations with different hydrological, soil, and vegetative conditions.

Pesticide Spray Drift

Pesticide spray drift, the aerial transport of pesticide droplets off target areas during spray application, presents another pathway by which these chemicals can enter aquatic ecosystems. Unlike hydrological transport, pesticide physicochemical properties play a negligible role in aerial transport (although formulation does act as an influencing factor). Weather conditions (e.g., wind speed, temperature, and humidity), equipment type, application practices, and target crop all affect aerial transport. There is a better understanding of pesticide aerial drift to streams than that of hydrological pathways, either as a result of occurring in a less complex matrix, or as Reichenberger et al. (2007) asserts, due to aerial drift receiving more regulatory scrutiny.

Management of riparian areas can significantly reduce pesticide spray drift in many cases, particularly when conducted in conjunction with proper application practices. However, in their review of mitigation via windbreaks, Ucar and Hall (2001) found no general consensus on optimum riparian buffer widths to protect water quality. Their review reports that research has yielded buffer width recommendations that range from 20 to 150 ft (6 to 45 m) for ground application and 80 to over 4,000 ft (25 to over 1,200 m) for aerial application. Despite this lack of harmony in recommendations, individual cases have yielded positive results. Analysis of a forested riparian area in British Columbia found that a 25 ft (7.6 m) buffer limited the amount of herbicide reaching the stream to less than 0.1% of the aerial application (Feng et al. 1990). In an agricultural setting, a simple 10 ft (3 m) no-spray buffer reduced herbicide drift deposition to adjacent surface waters by 95%, and no measurable drift reached the stream at a width of 20 ft (6 m) as long as the wind-speed was below 15 mph (25 kph) in the direction towards the buffer (De Snoo and De Wit 1998). Many factors contribute to the effectiveness in reducing pesticide drift to acceptable levels. While wind-speed and application method exert significant impacts, vegetation height, density, orientation, and species composition all play pivotal roles. For instance, Ucar and Hall (2001) suggest that, in general, evergreen species display capture efficiencies 2 to 4 times greater than deciduous trees.

5.4.5. Pathogens

Pathogens impair more waterbodies in Washington than any other contaminant (USEPA 2015). Fecal contamination of surface waters can lead to the introduction of various pathogenic bacteria, fungi, viruses, protozoans, and worms that infect the gastrointestinal tract and present a health risk to both humans and wildlife. Common infections related to fecal pollution result from the presence of pathogenic bacteria such as *Escherichia coli* (*E. coli*), *Salmonella* spp. and *Vibrio* spp. or viruses such as Rotavirus. Primary pathogenic protozoans of concern include *Cryptosporidium parvum* and *Giardia lamblia,* which are able to form oocysts (protective spores) that allow them to survive outside of a host for long periods. Helminths represent a general class of parasitic worms, including flatworms and roundworms, which can act as intestinal parasites. The myriad pathogens that can be found in riverine systems following fecal contamination makes it impractical to list them here, but it is important to understand the four different pathogenic categories that can be conveyed to people through surface water contact or ingestion.

Pathogens comprise a diverse range of microorganisms that are typically found in low concentrations, making it impractical to test for specific pathogens when conducting water quality assessments. As an alternative, "pathogen indicator organisms" are used as a proxy to assess the potential presence of pathogens in a water sample. Commonly employed pathogen indicators include total coliforms, fecal coliforms, and *E. coli.* Total coliforms comprise a group of five genera of bacteria that easily can be analytically differentiated from other microorganisms, and while some occur naturally in soils, many are found in the gastrointestinal tract of warm-blooded animals and can serve as a general marker for fecal contamination. Fecal coliforms represent a sub-group of total coliforms that more specifically reside in the intestines of warm-blooded animals, making them a more accurate indication of the presence of fecal material in water. Washington water quality standards use fecal coliforms as indicator organisms to determine water quality impairment. *E. coli,* a species in the fecal coliform group, is a dominant inhabitant in the digestive tract and is generally considered the best indicator of fecal pollution of the three. As *E. coli* are indigenous enteric bacteria, they are not in themselves pathogenic although some strains are (e.g., *E. coli* O157:57). Although most of these indicator organisms are not pathogenic, it is common to refer to them as pathogens when discussing water quality (shortening the phrase "pathogens and pathogenic indicator organisms"), and while technically inaccurate, we will use that term in this section. We use the term in a way that should allow the reader to differentiate between whether we are referencing pathogens specifically or the broader group that includes pathogen indicator organisms.

As the pathogens in question are enteric, they are introduced into the environment through the feces of warm-blooded animals. Principal pathways for pathogens entering aquatic ecosystems are through direct defecation by livestock, wildlife, and pets in the riparian area and via overland flow carrying fecal material from upland pastures, animal feeding operations, fields that have received land-applied manures, or seepage from septic or sewage systems. Feces from domesticated dogs can be a predominant pathogen source in urban areas, as a study in Seattle attributed 30% of the fecal contamination to canines (Tobiason et al. 2002). Hobby farms also present an often-overlooked source adversely affecting water quality, and this has been shown to be an issue in Washington (Morace and McKenzie 2002).

The fate of pathogenic microorganisms in the environment is still not well understood in general and much uncertainty remains in the context of riparian areas. While many of the pathogens that can contaminate surface waters are obligate parasites,

some can persist outside of an animal's gastrointestinal tract in the environment. The length of time these microorganisms can survive under different conditions is a current topic of debate in the research community. The general assumption in the past was that these enteric organisms were not able to persist in the environment for more than a few days following excretion in feces. However, more recent research indicates that bacterial pathogens can survive for much longer periods, and it is generally recognized that persistence in the environment for two to three months is not uncommon. Longer survival rates are possible given the correct conditions, as demonstrated in a laboratory study where *E. coli* O157:H7 persisted for over 190 days in manure-amended soils (Jiang et al. 2002). General factors that influence the survival of pathogenic bacteria that enter riparian areas include soil moisture, temperature, pH, sunlight, nutrient availability, soil texture, and biological interactions. Moist, nutrient-laden, shady conditions such as those often found in riparian areas theoretically would provide an environment in which pathogens could survive longer, potentially being picked up by overland flow and introduced to adjacent stream channels.

Although considerable research has been conducted through the years on bacterial movement through environmental systems, research is in the nascent stages of examining the transport and fate of pathogens across the landscape and in riparian areas. Unc and Goss (2004) offer a concise review on the transport of bacteria from manure in relation to protecting water resources, and although the material presented does not focus on streamside areas it does provide fundamental information on the mechanisms involved in pathogen transport. The body of research that has examined pathogen attenuation in riparian areas is small although expanding, and almost all findings are related to vegetative filter strips and do not consider natural riparian ecosystems.

The capacity of vegetative filter strips to remove pathogens is not well established and research results have demonstrated that these systems exhibit great variability in their effectiveness in removing pathogens. A number of studies have shown that filter strips impart no significant influence on pathogen and pathogenic indicator organism concentrations moving toward a stream channel (Walker et al. 1990; Schellinger and Clausen 1992; Chaubey et al. 1995; Coyne at al. 1995; Entry et al. 2000). Contradictory findings have been generated by other studies that promote the idea that well maintained filter strips can serve as an effective BMP to prevent pathogens from reaching surface waterbodies (Coyne et al. 1998; Fajardo et al. 2001; Tate et al. 2006).

Inconsistent findings result from a number of factors. Soil infiltration, antecedent soil moisture conditions prior to a rain event, vegetation status, topography, and rainfall intensity and duration all have been identified as key controlling variables (Muñoz-Carpena et al. 1999; Guber et al. 2009). Each of these parameters relates to the concept that pathogens being carried in overland flow are removed by their infiltration into the soil where they typically are filtered or adsorbed to soil particles. High intensity rain events and concentrated flow can significantly reduce pathogen removal efficacy below that which would occur under low-flow conditions (Fox et al. 2011b). Vegetative filter strip width plays a significant role in pollutant removal, where a linear

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decrease in pathogenic bacteria has been consistently observed with increasing buffer width (Young et al. 1980). However, a potential exists for trapped pathogens to later be remobilized in subsequent runoff events. Higher concentrations of pathogens have been recorded in runoff during a second runoff event, which suggests that filter strips could become indirect sources of pathogens under some conditions (Collins et al. 2004).

5.5. Effect of Riparian Buffer Width on Pollutant Removal

The pollutant removal function of riparian areas has been studied for at least 40 years (e.g., Doyle et al. 1975), and the enormous quantity of scientific research over the past four decades has motivated numerous reviews of the scientific literature (Norris 1993; Osborne and Kovacic 1993; Barling and Moore 1994; Vought et al. 1995; Fennesy and Cronk 1997; Lyons et al. 2000; Dosskey 2001; Hickey and Doran 2004; Lacas et al. 2005; Krutz et al. 2005; Polyakov et al. 2005; Hoffman et al. 2009; Dosskey et al. 2010). Despite the large quantity of research and number of literature reviews, no widely accepted recommendations have emerged on minimum buffer widths needed to protect water quality. The lack of agreement amongst scientists is due, in part, to the surprising complexity of the mechanisms that remove pollutants from surface and subsurface flows in riparian areas, to the variety of research methods used to study pollutant removal by riparian buffers, and to the many different environmental conditions at research sites.

The quantitative metric of pollutant removal by riparian areas is referred to as removal efficacy, removal efficiency, or percent removal. These measures are usually defined as:

$$E_R = \frac{m_{in} - m_{out}}{m_{in}} \times 100 \qquad (1)$$

where m_{in} and m_{out} are the mass or concentration of the pollutant entering and exiting a riparian buffer, respectively. The primary question addressed by nearly all research on the pollutant removal function of riparian areas, and by nearly all literature reviews, is how does riparian buffer width affect removal efficacy? The main answers are: 1) removal efficacy increases as buffer width increases, 2) topographic slope and vegetation type strongly affect removal efficacy, and 3) the relationship between removal efficacy and buffer width is highly variable.

In addition to the many literature reviews cited above, several statistical meta-analyses of research results (Mayer et al. 2007; Liu et al. 2008; Yuan et al. 2009; Zhang et al. 2010; Sweeney and Newbold 2014) provide synoptic perspectives on what is currently known about the relationship between buffer width and removal efficacy (Table 5.1). Research results from throughout the world were collected by all five meta-analyses, but the majority were from North America. The remainder of this section discusses the findings of those meta-analyses.

Four meta-analyses looked at the results of research on sediment removal. The meta-analyses found that buffer width alone explained 28% to 37% of the variance in sediment removal results. Models for removal efficacy versus buffer width predicted a wide range of buffer widths necessary for 90% efficacy: 33, 39, 75, and 170 ft (10, 12, 23, and 52 m) (Figure 5.2). Three of the meta-analyses found that adding slope as an independent variable significantly improved the fit of their models to the data. Two meta-analyses (Liu et al. 2008; Zhang et al. 2010) using the same studies but different modeling assumptions, found that optimum slope for sediment removal was about 10%. In other words, removal efficacy increased as slope increased from 1 to 10%, but then removal efficacy decreased as slope increased above 10%. However, extrapolating these findings to other locations should be done cautiously as this relationship may not hold under many conditions. Zhang et al. (2010) found that buffer width, slope,

and vegetation type together could explain 65% of the variance in sediment removal results. Curiously, they also found that buffers composed of grasses only or trees only were more efficacious at removing sediment than buffers composed of both grasses and trees (Figure 5.4).

Three separate meta-analyses looked at the results of research on nitrogen removal. The meta-analyses of Zhang et al. (2010) and Mayer at al. (2007) produced very different relationships for removal efficacy versus buffer width. Zhang et al. (2010) found that buffer width alone explained 44% of the variance in nitrogen removal results, but Mayer et al. (2007) found buffer width alone explained only 9%. Furthermore, Zhang et al. (2010) predicted that buffer widths of 80 ft (24 m) are necessary for 90% removal efficacy, while Mayer et al. (2007) predicted buffer widths of 436 ft (133 m) for the same efficacy (Figure 5.3). Separate models by Mayer et al. (2007) for surface and subsurface flows found a significant relationship (assuming $\alpha = 0.05$) between buffer width and removal efficacy for surface flows ($R^2 = 0.21$, $P = 0.03$) but not for subsurface flows ($R^2 = 0.02$, $P = 0.3$). Despite this result, Mayer et al. (2007) found that riparian buffers were more efficacious in removing nitrogen from subsurface waters than from surface waters. Mayer et al. (2007) found no significant relationship between nitrogen removal and buffer vegetation type but their collection of studies did show that buffers lacking trees (herbaceous cover only) were the least efficacious at removing nitrogen.

Zhang et al. (2010) found a relationship between vegetation type and nitrogen removal and that buffers composed of trees remove more nitrogen than buffers completely or partially composed of grasses. Zhang et al.'s model that included buffer width and vegetation type explained 49% of the variance in nitrogen removal results.

Comparing regression models for sediment and nitrogen removal (Figures 5.2 and 5.3) illustrates three important points regarding the pollutant removal function of riparian areas. First, the magnitude of removal efficacy for different pollutants can be very different. According to the models, 80% of sediment was removed at roughly 50 to 65 ft (15 to 20 m), but 80% removal of nitrogen may require buffer widths two to four times wider. Second, the variability of removal efficacy for various pollutants can be significantly different. The regression models for nitrogen removal show much more variation than the models for sediment removal. The wider variation is due, in part, to the greater complexity of the chemical and biological processes affecting nitrogen removal compared to the simpler physical processes affecting sediment removal. Hence, our ability to predict removal efficacy and our certainty about water quality protection can be very different for different pollutants. Third, for all pollutants the relationship between buffer width and removal efficacy follows a law of diminishing marginal returns. That is, the marginal (or incremental) amount of pollutant removal decreases as buffer width increases.

Zhang et al. (2010) also conducted meta-analysis for phosphorus and pesticides. Buffer width alone explained 35% of the variance in phosphorus removal results (Figure 5.5), and with the addition of vegetation as an independent variable, the model explained 47% of the variance. The buffer-width-only model predicts 89% phosphorus removal with a buffer 98 ft (30 m) wide.[7] Buffers with trees were found to remove more phosphorus than buffers completely or partially composed of grasses. The pesticide meta-analysis included 11 chemicals (norfluranzon, fluometuron, lindane, deisopropylatrazine, deethylatrazine, atrazine, permethrin, bromide, terbuthylazine, metolachlor, isoproturon). Buffer width alone explained 60% of the variance in pesticide removal results, and vegetation was found to be an insignificant predictor variable. The model predicts 92% pesticide removal with a buffer 65 ft (20 m) wide.

7 Because Zhang et al. (2010) assumed an asymptotic equation for their regression, the phosphorus model was invalid for efficacies greater than 89.5%.

Using data provided by Zhang et al. (2010), we calculated prediction intervals for their phosphorus model.[8] A prediction interval describes the precision of a model's predictions and the interval's width is a metric of uncertainty. For a buffer 33 ft (10 m) wide, the width of the 90% prediction interval is 64%. Therefore, while the model predicts that a 33 ft (10 m) buffer will provide an average removal efficacy of 70%, the actual removal efficacy obtained by another study on phosphorus removal (i.e., one which was not included in the meta-analysis) is likely to be somewhere between 38 and 100% (70% ± 32%). The low precision of the model's prediction interval is related to the unexplained variance that could be attributed to other variables not included in the regression, such as site slope and various soil properties.

Table 5.1. Descriptive information for functional relationships on sediment removal shown in Figure 5.2 and nitrogen removal shown in Figure 5.3. Reference numbers 1 through 4 correspond to numbers in Figures 5.2 and 5.3. In the equations, E_R is the removal efficacy, *width* is riparian buffer width, and *a*, *b*, *c*, *d*, and k_{50} are parameters determined through linear or nonlinear regression.

Pollutant	Meta-analysis	Form of equation	Model	*N****	R^2	*P* value
Sediment	(1) Liu et al. (2008)**	$E_R = a + b\ \ln(width)$	width	79	0.34	< 0.001
		$E_R = a + b \times width + c \times slope + d \times slope^2$	width & slope = 5% width & slope = 10% width & slope = 15%	79	0.43	< 0.0001
	(2) Yuan et al. (2009)	$E_R = a + b\ \ln(width)$	width	75	0.30	na*
			width & slope ≤ 5%	53	0.32	na
			width & slope > 5%	14	0.17	na
	(3) Zhang et al. (2010)**	$E_R = a\ (1 - e^{b \times width})$	width	81	0.37	< 0.0001
		$E_R = a\ (1 - e^{b \times width}) + c + d \times slope$	width & slope = 5% & grass or trees width & slope = 10% & grass or trees width & slope = 15% & grass or trees	81	0.65	< 0.001
	(4) Sweeney and Newbold (2014)	$E_R = \frac{width}{k_{50} + width}$	width	22	0.28	na
Nitrogen	(1) Mayer et al. (2007)	$E_R = a \times width^b$	width, surface water only	23	0.21	0.03
			width & herbaceous vegetation	32	0.21	0.009
			width & herbaceous/forest vegetation	11	0.39	0.04
	(2) Zhang et al. (2010)	$E_R = a\ (1 - e^{b \times width})$	width	61	0.44	< 0.0001
		$E_R = a\ (1 - e^{b \times width}) + c$	width & trees vegetation width & grass or mixed grass/trees veg.	61	0.49	< 0.001
	(3) Sweeney and Newbold (2014)†	$E_R = 100\ (1 - e^{b \times width/q})$	width & q set to 58‡ width & q set to 115	30	0.37	na*

* Signifies that *P* value was not reported in cited study.

** Nearly all the studies included by Liu et al. (2008) and Zhang et al. (2010) in their meta-analyses were the same studies.

*** *N* signifies number of studies in meta-analysis.

† Studies for subsurface nitrate removal only.

‡ q represents subsurface water flux. 58 and 115 L/m/day are median and mean subsurface water fluxes for studies collected by Sweeney and Newbold (2014).

[8] A prediction interval is a range that is likely to contain the dependent response value (Y_i) for a new observation (X_i). A prediction interval assumes that the new observation is taken from the same population used to create the regression equation.

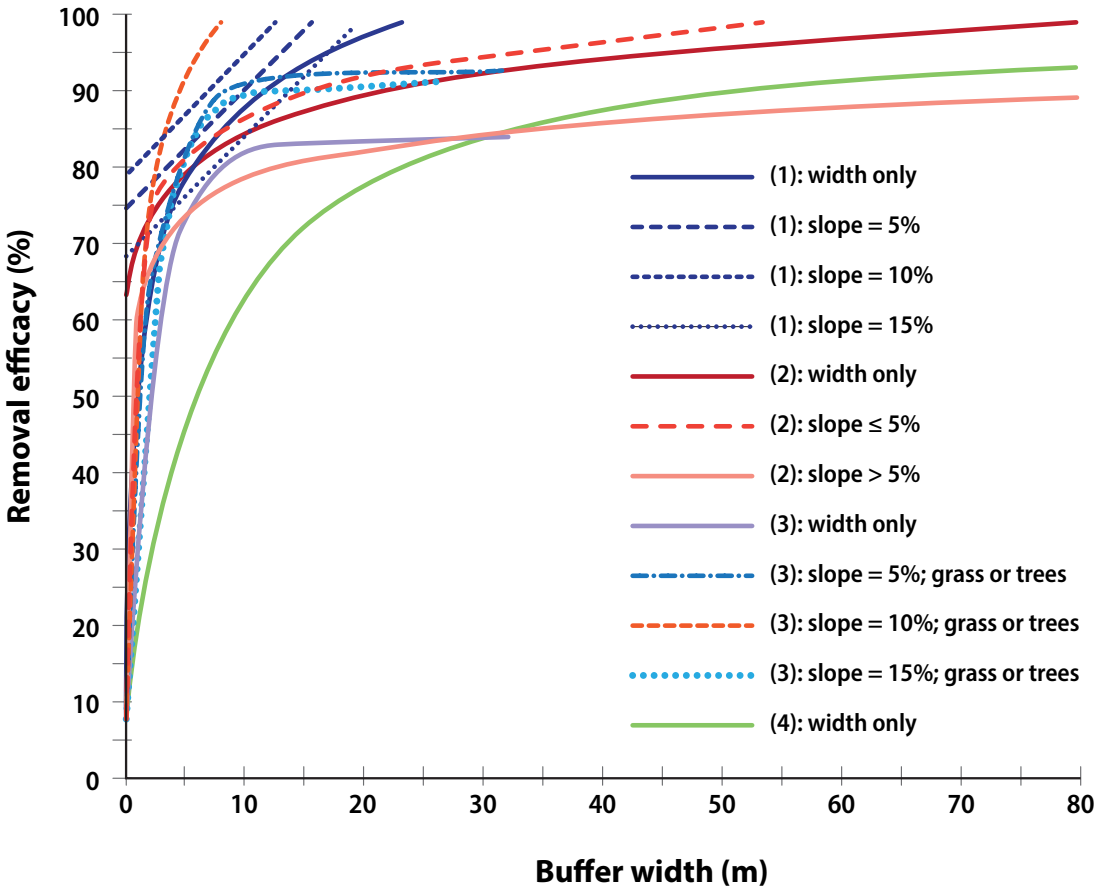


Figure 5.2. Relationships between sediment removal efficacy and riparian buffer width developed by four separate meta-analyses. Numbers in parentheses refer to different meta-analyses. See descriptive information in Table 5.1.

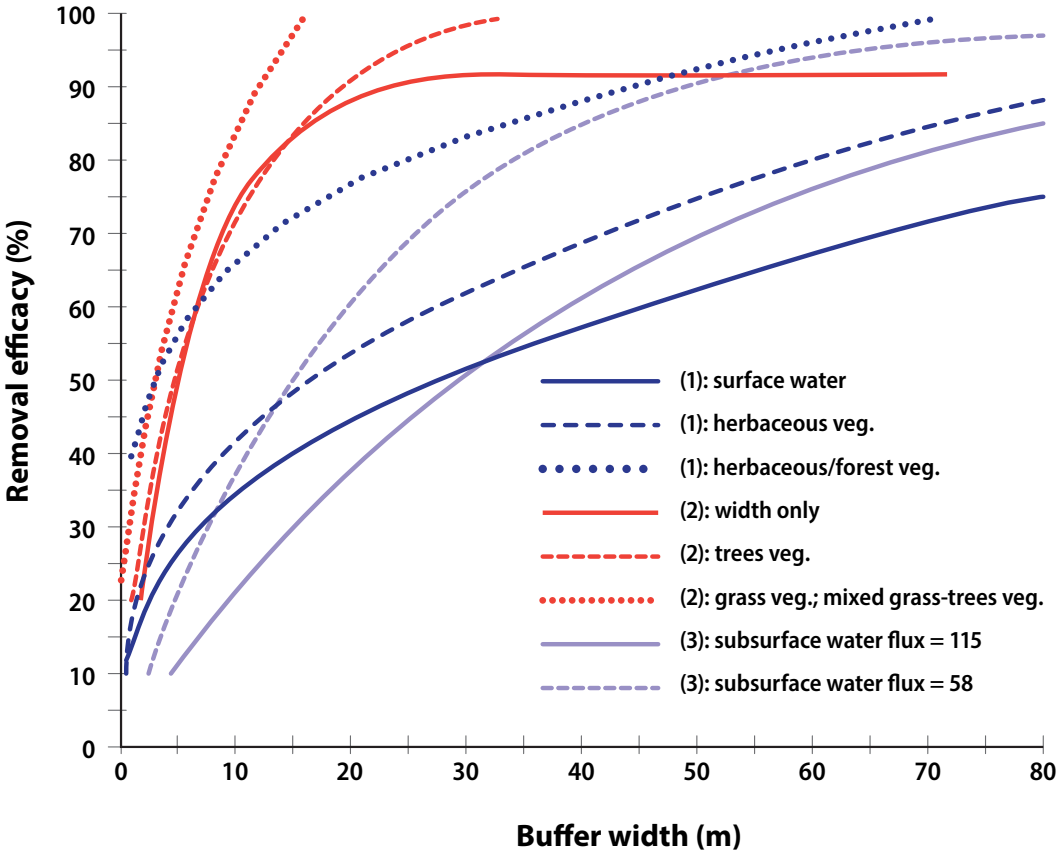


Figure 5.3. Relationships between nitrogen removal efficacy and riparian buffer width developed by three separate meta-analyses. Numbers in parentheses refer to different meta-analyses. See descriptive information in Table 5.1.

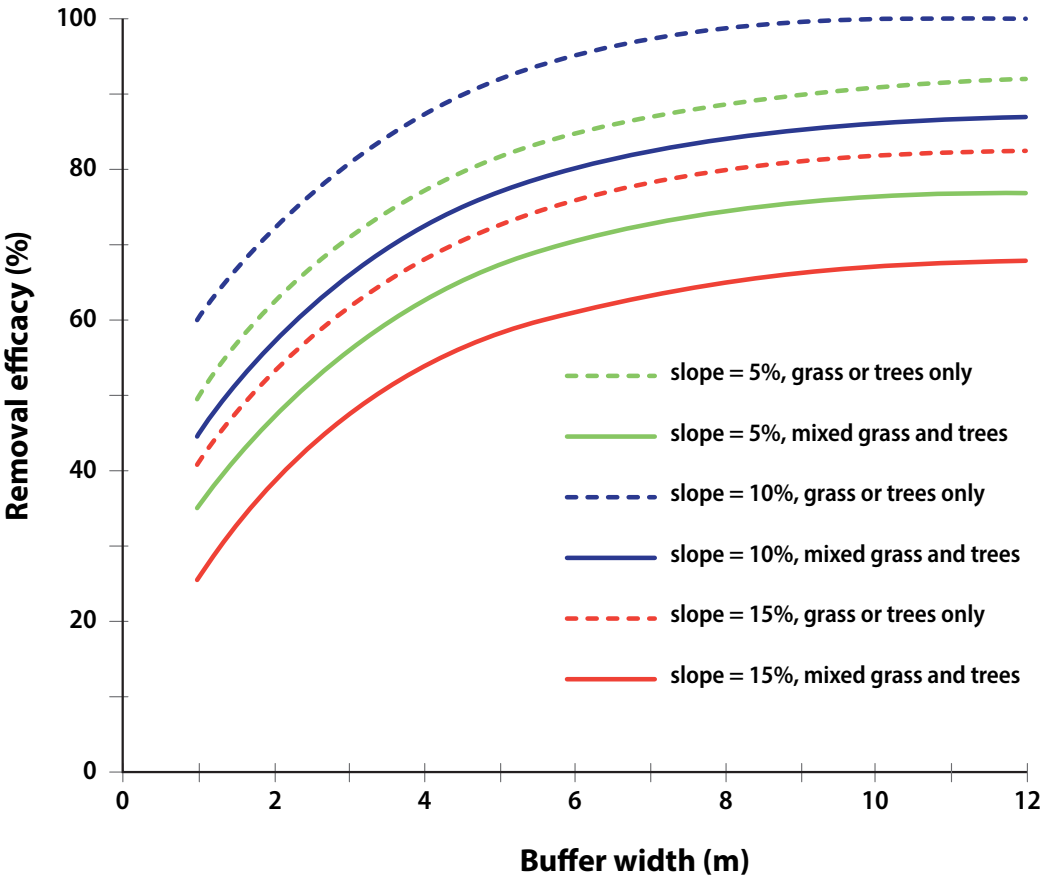


Figure 5.4. A result from meta-analysis of Zhang et al. (2010). Sediment removal efficacy as a function of buffer width, site slope, and buffer vegetation ($N = 81$, $R^2 = 0.65$, $P < 0.001$).

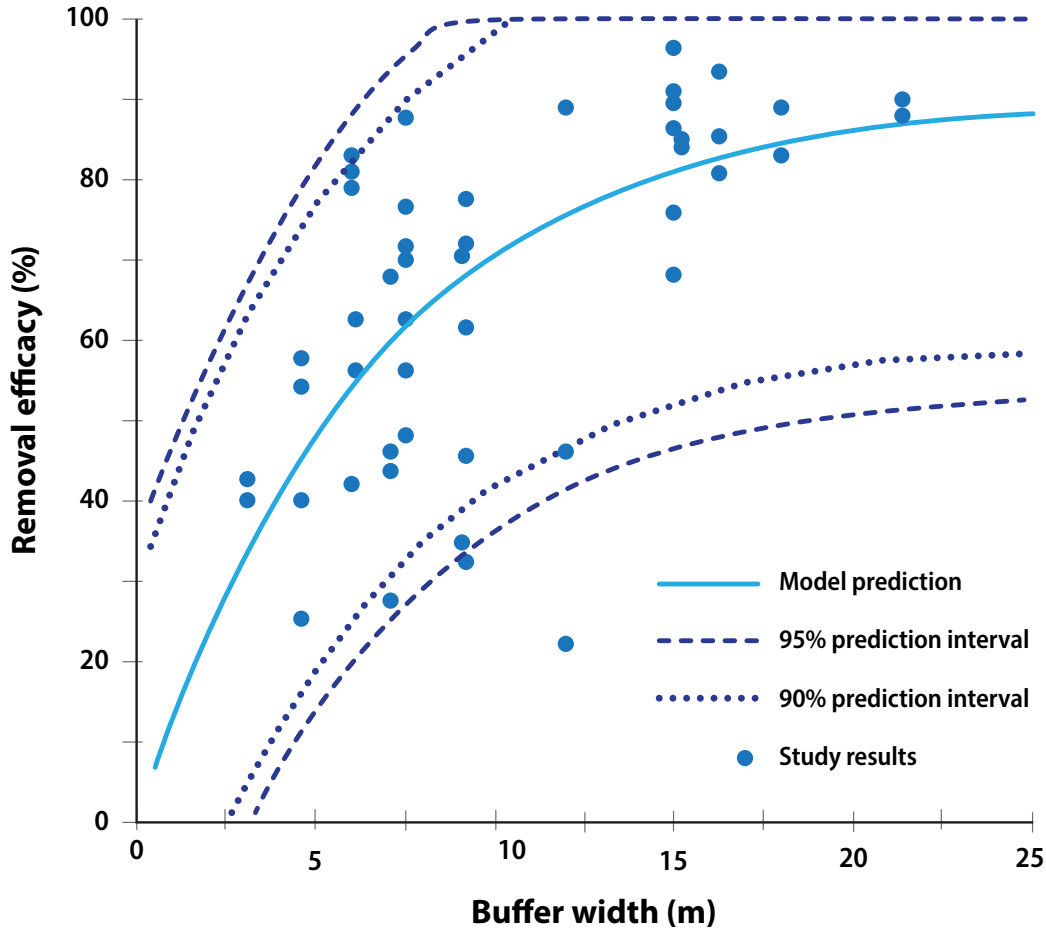


Figure 5.5. Meta-analysis of Zhang et al. (2010). Results of nonlinear regression for phosphorus removal efficacy as a function of buffer width ($N = 52$, $R^2 = 0.35$, $P < 0.0001$) with 90% and 95% prediction intervals.

5.6. Reanalysis of Meta-Analyses

A major assumption made by each of the meta-analyses was the type of equation that would result in the best fit to their data. Zhang et al. (2010), for instance, chose to use a nonlinear asymptotic equation of the form:

$$E_R = a\,(1 - e^{b \times width}) \qquad (2)$$

where E_R is removal efficacy, ***width*** refers to buffer width, and ***a*** and ***b*** are coefficients determined through nonlinear regression. In equation (2), *a* determines the maximum removal efficacy possible (i.e., it is an asymptote). Zhang et al. (2010) conducted their regression such that *a* could be less than 100%. For sediment, pesticide, nitrogen, and phosphorus pollutants, *a* equaled 91, 93, 92, and 89.5 percent, respectively. Hence, we could not determine buffer widths needed for removal efficacies greater than these values of *a* in their models. This limitation was particularly problematic for pesticides and phosphorus because Zhang et al. (2010) was the only meta-analysis for those pollutants.

To determine buffer widths needed for higher removal efficacies (90, 95, 99%), we reanalyzed Zhang et al.'s data with a nonlinear equation of the form:

$$E_R = a + b\ \ln(width) \qquad (3)$$

This form of model is the same used by Liu et al. (2008) and Yuan et al. (2009).[1] We performed linear regression in R (RCT 2013) using the lm function, but first we established that we could obtain the same regression results (same values for ***a*** and ***b***) as Zhang et al. (2010) using equation (2). This confirmed that the data we downloaded from the internet were the same data used by Zhang et al. (2010). We then redid the regression using equation (3). With the exception of sediment, the resulting models fit the data as well or better than the original models of Zhang et al. (2010) (Table 5.2). Graphical comparisons of our results and those of Zhang et al. (2010) are presented in Figure 5.6.

Table 5.2. Comparison of R^2 values for Zhang et al.'s (2010) model and our reanalysis using equation (3). *N* is the number of studies included in the meta-analysis.

Pollutant	*N*	R^2	
		Zhang et al. (2010)	Reanalysis
Sediment	81	0.37	0.31
Nitrogen	61	0.44	0.44
Phosphorus	52	0.35	0.39
Pesticides	49	0.60	0.61



Juvenile fish find shelter in a root wad/Terra Hegy, WDFW

1 Xuyang Zhang, the lead author of Zhang et al. (2010), also recommended that we use equation (3) because equation (2) cannot model 100% removal efficacy (X. Zhang, California Department of Pesticide Regulation, personal communication, May 14, 2019).

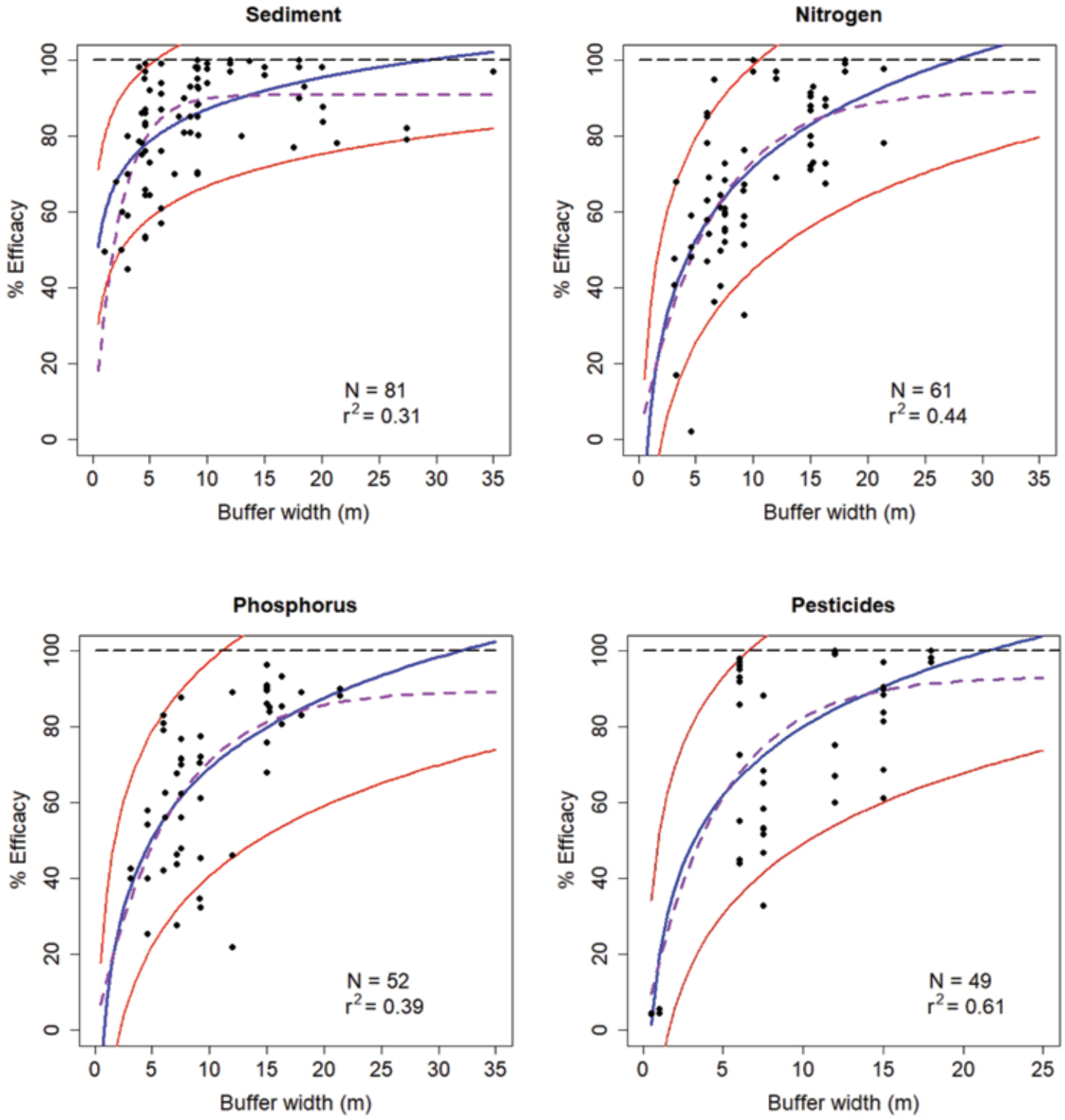


Figure 5.6. Relationship between removal efficacy and buffer width. Data from meta-analysis of Zhang et al. (2010) but reanalyzed using different form of nonlinear model. Line colors: blue: best fit model, red: 90% prediction interval, purple dashed: original model of Zhang et al. (2010), black dashed: 100% removal efficacy

We also reanalyzed two other meta-analyses – Mayer et al. (2007), and Sweeney and Newbold (2014) – for two reasons. The first reason was consistency across meta-analyses. The meta-analyses gave different answers for the relationship between removal efficacy and buffer width. For example, Zhang et al. (2010) predicted that buffer widths of 80 ft (24 m) are necessary for 90% removal efficacy of nitrogen, while Mayer et al. (2007) predicted buffer widths of 436 ft (133 m) for the same efficacy. Part of this discrepancy may be due to the type of equations adopted for their nonlinear or linear regressions, so we redid both meta-analyses using the same equation. Second, as noted earlier, a major assumption made by each of the meta-analyses was the type of equation that would result in the best fit to their data. We tested that assumption, and found that equation (3) often resulted in a better fit.

Mayer at al. (2007) chose to use a power function of the form:[2]

$$E_R = a\ width^b \qquad (4)$$

where ***a*** and ***b*** are coefficients determined through linear regression. We reanalyzed their data using equation (3). The resulting models fit the data as well or better than the original models of Mayer et al. (2007) (Table 5.3, Figure 5.7). For subsurface flow, the relationship between removal efficacy and buffer width was statistically insignificant ($P = 0.30$) and R^2 was only 0.02 for both their model and ours. We also note that both models produce somewhat absurd results – 60% of subsurface nitrogen can be removed with buffers only 2 ft wide but 90% removal requires buffers over 1200 ft wide. Hence, we will use neither model in further discussions of sub-surface nitrogen removal. For surface flow, the reanalysis resulted in a slightly better fit to the data – R^2 improved from 0.21 to 0.28.

We did not reanalyze the meta-analysis that Sweeny and Newbold (2014) did on studies of nitrogen removal from groundwater. While Sweeney and Newbold (2014)

Table 5.3. Comparison of R^2 values for Mayer et al.'s (2007) model and our reanalysis using equation (3). *N* is the number of studies included in the meta-analysis.

		Mayer et al. (2007)		Reanalysis	
Model	*N*	R^2	*P*	R^2	*P*
nitrogen, surface	23	0.21	0.03	0.28	0.009
nitrogen, subsurface	65	0.02	0.30	0.02	0.30

found a significant statistical relationship between nitrogen removal from subsurface flow and buffer width, other studies suggest the buffer width has little or no effect on nitrogen removal from subsurface flow (Hruby 2013, pp. 10-11).

For sediment removal, Sweeney and Newbold (2014) chose an equation of the form:

$$E_R = \frac{width}{k_{50} + width} \qquad (5)$$

where k_{50} equals the buffer width expected to remove 50% of sediments and it is determined through nonlinear regression. We reanalyzed their data using equation (3). The resulting model fits the data better than the original model of Sweeney and Newbold (2007). Their R^2 was 0.28 and the new R^2 is 0.33 (Figure 5.7).

Table 5.4 shows the buffer width needed to achieve desired levels of pollutant removal as predicted by meta-analyses and our reanalyses of meta-analyses. We combined predictions from multiple meta-analyses using a weighted average with the weights being the products of *N* and R^2. Note that values in Table 5.4 are predicted averages for removal efficacy. The actual efficacy realized by implementing a particular buffer width could be much better or worse. The amount of uncertainty in the realized removal efficacy is depicted by prediction intervals in Figures 5.6 and 5.7. The

2 The equation $E_R = a\ width^b$ can be transformed to the equation $\ln(E_R) = a' + b\ \ln(width)$, which is similar in structure to equation (3) and results in a similar fit to the data. Equation (3) was also the form used by Mayer et al. (2006).



Riparian areas capture pollutants/Marlin Greene, One Earth Images

reanalyzed meta-analysis of Zhang et al. (2010), for example, predicts that 90% of sediment can be removed with a 42 ft (13 m) wide buffer, however, according to the prediction interval, the buffer width needed for 90% removal could be as narrow as 8 ft (2.4 m) or as wide as 225 ft (69 m). Better models that include other independent variables, such as slope and vegetation (e.g., Zhang et al. 2010), will reduce this uncertainty, but there is a trade-off. The application of more complicated models leads to more complicated management. If, for example, managers adopted a model that includes vegetation type or vegetation structure, then, in addition to buffer width, they must also manage the condition of vegetation within the buffer.

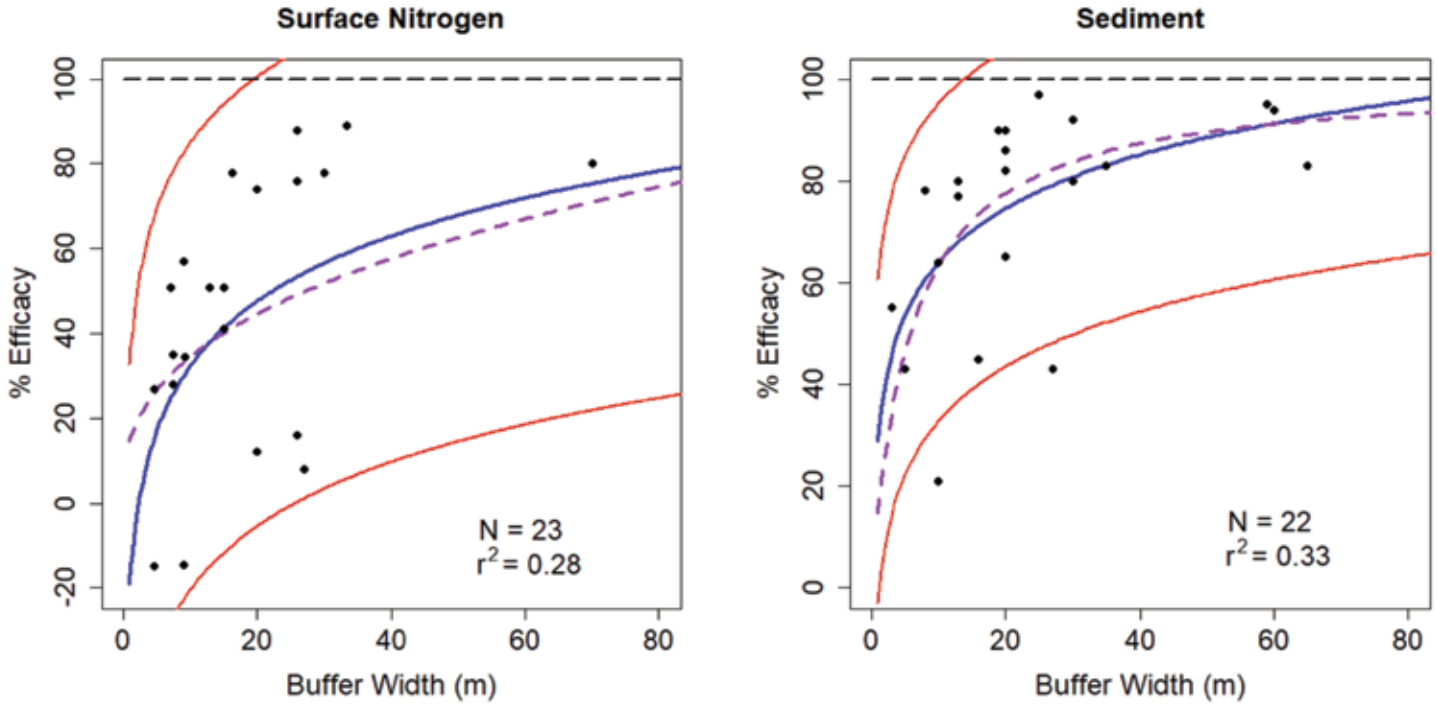


Figure 5.7. Relationship between removal efficacy and buffer width. Study results from meta-analyses reanalyzed using different form of equation in a linear regression. Left: nitrogen study results from Mayer et al. (2007). Right: sediment study results from Sweeney and Newbold (2014). Line colors: blue: best fit model, red: 90% prediction interval, purple dashed: original models from meta-analyses, black dashed: 100% removal efficacy.

Table 5.4. Buffer width in feet needed to achieve desired levels of pollutant removal from run-off. Buffer width calculated with model and/or data from the cited literature. Models had only one predictor variable, which was buffer width. Mean buffer width for sediment and nitrogen removal are weighted averages of widths determined by each meta-analysis. Weights were the product of *N* and R^2.

				Average Removal Efficacy (%)	80	90	95	99
Pollutant	**Meta-analysis**	***N***	***R^2***	**Buffer Width (ft)**				
Sediment	Liu et al. (2008)*	79	0.34		18	39	56	76
	Yuan et al. (2009)	75	0.30		18	74	149	261
	Zhang et al. (2010)*, *reanalyzed*	81	0.31		18	42	64	89
	Sweeney and Newbold (2014), *reanalyzed*	22	0.33		94	181	251	326
				Weighted mean	**25**	**62**	**101**	**153**
Nitrogen, surface	Mayer et al. (2007), *reanalyzed*	23	0.28		283	444	556	666
	Zhang et al. (2010), *reanalyzed*	61	0.44		44	63	76	88
				Weighted mean	**90**	**137**	**169**	**200**
Nitrogen, subsurface	Sweeney and Newbold (2014) ‡	30	0.37		112	161	210	322
Phosphorus	Zhang et al. (2010), *reanalyzed*	52	0.39		50	72	87	101
Pesticides	Zhang et al. (2010), *reanalyzed*	49	0.61		33	48	59	68

* Nearly all the studies included by Liu et al. (2008) and Zhang et al. (2010) were the same studies.

‡ The parameter q, which represents subsurface water flux, was set to 58, which is the median value for 30 studies analyzed by Sweeney and Newbold (2014).

5.7. Conclusions

There is a consensus in the scientific literature that riparian areas reduce the flow of pollutants to aquatic ecosystems, and that pollutant removal functions are contingent on complex interactions between hydrology, soil, and vegetation, and are influenced by many other factors as well. Because hydrology, soil, vegetation and other factors exhibit high spatial and temporal variability, the efficacy of pollutant removal functions provided by riparian areas differs substantially among sites, as well as within sites. Determining the potential for riparian areas to protect water quality is further complicated by the disparate behavior of different contaminant types in the environment. While space limitations required us to simplify this review of the scientific literature regarding pollutant removal functions of riparian areas, we provided the basic information needed for understanding these important ecological functions.

Our review of the literature presents a substantial body of scientific research with which to develop strategies, plans, or policies regarding the pollutant removal functions of riparian areas. The central problem faced by resource managers is determining the adequate riparian buffer width, composition, and structure to protect water quality with high degrees of efficacy, efficiency, and certainty. Riparian function is often simplistically characterized by buffer width and vegetation type, but these parameters only partially explain the effects that riparian areas have on pollutant removal. The current conservation paradigm remains strongly tied to the

premise that wider riparian areas are the only way to increase pollutant removal efficacy, but this is not always the case; other site-specific factors, such as conditions within the buffer, also exert a significant influence on removal efficacy. Therefore, consideration of the entire system (i.e., riparian area, uplands, vegetation, soils, ground and surface water pathways, topography, type of pollutant, etc.) is essential to developing cost-effective pollutant removal. In theory, buffer width and vegetation could be optimized for site conditions such that water quality is protected while minimizing economic costs for landowners.

Despite the many scientific uncertainties, management decisions must be made. Management decisions regarding pollutant removal by riparian buffers should be informed by science, but determining the "right" buffer width for pollutant removal cannot be purely scientific. Determining the "right" buffer width begins with choosing a desired removal efficacy, and that choice is normative. That is, the desired removal efficacy is a social choice influenced by cultural values, economic costs, and risk tolerance. Choosing a desired removal efficacy and determining the "right" buffer requires: 1) factual information regarding the anticipated impacts or outcomes of policy options (i.e., science); 2) an understanding of stakeholders' priorities and preferences (i.e., values); and 3) a process for using science and values to explore tradeoffs amongst policy options (Wilhere and Quinn 2018).

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Okanogan National Forest/Scott Fitkin, WDFW

Chapter 6. Nutrient Dynamics in Riparian Ecosystems

By: Paul M. Mayer, Jana E. Compton, and George F. Wilhere

6.1. Introduction

Riparian ecosystems play a vital role in the dynamics of nutrients within watersheds, especially for the three primary macronutrients carbon (C), nitrogen (N), and phosphorus (P). Because they are positioned at the interface between the stream and upland areas, riparian ecosystems mediate the movement of materials and energy between land and water. Riparian areas can be sources or sinks of energy, water, nutrients, organic matter, and organisms within a watershed. Organic matter from riparian areas, an important source of energy and nutrients, makes its way into streams via plant litterfall, or through transport by water, wind, or animals. Organic matter in streams provides habitat and food for microbes, insects, fish, amphibians, birds, and other organisms, and decomposes to release plant-available inorganic nutrients like ammonium, nitrate, and phosphate. Riparian areas also store energy and nutrients from organic matter coming from upland and instream sources through biotic uptake, sorption and exchange, and slowing or trapping particles. Riparian areas also are sites with high rates of nutrient transformation, including conversion of inorganic nitrogen into the gases N_2 or N_20 via denitrification. Riparian ecosystems are influenced by upland activities that supply nutrients that follow flow paths through these ecosystems, eventually reaching streams via surface and subsurface flows. Age, vegetation composition, topography, soil type, and condition of the riparian ecosystem all factor into the fate and transport of nutrients. In addition, the position in the drainage network and connectivity of the riparian area, along with disturbance and management history, affect nutrient processing rates.

Nutrients and the hydrological and biogeochemical processes that dictate their transport and fate are the subject of much current research in riparian ecology (Mayer et al. 2010a, 2014) because of their critical importance for growth and maintenance of life in the riparian ecosystem and the subsequent effects on stream biota and water quality. Although many micro- and macro-nutrients cycle through riparian areas, this chapter addresses only the three primary macronutrients C, N, and P.

Streams in the Pacific Coastal Ecoregion of Washington State are generally oligotrophic, well shaded, and sensitive to nutrient enrichment (Welch et al. 1998). When more N and P enters a riparian ecosystem than can be immediately utilized or stored, degradation of aquatic habitat conditions can occur and negative consequences within or beyond the riparian ecosystem may result. Excess N and P input to streams and estuaries may lead to harmful algal blooms, hypoxia, fish kills, and contamination of drinking water supplies. Although stream nutrient concerns have a somewhat lower profile in the Pacific Northwest (PNW) relative to other areas of the US, such as the Chesapeake Bay or Great Lakes watersheds, approximately 20% of assessed rivers and 8% of assessed lakes in Washington are regarded by the state as having impaired conditions related to an overabundance of nutrients (USEPA ATTAINS database).

Here, we describe nutrient cycles in riparian areas in the PNW, focusing on C, N, and P from natural and anthropogenic sources. Other nutrients, such as calcium, sulfur, or molybdenum, are not as widely studied but have been shown to be important in areas of the PNW for forest growth or other ecosystem processes (Silvester 1989; Chappell et al. 1991; Perakis et al. 2006). When possible, we discuss implications of common land management activities on nutrient dynamics by contrasting disturbed versus undisturbed riparian ecosystems. We also discuss new information gained from recent stable isotope studies and meta-analyses of riparian nutrient removal that have greatly improved our understanding of the permanence and effectiveness of nutrient removal processes in PNW riparian ecosystems.

6.1.1. Nutrient Dynamics in the Pacific Northwest

Figure 6.1 illustrates processes occurring in a largely undisturbed PNW forested riparian ecosystem and associated stream and upland. Water traveling through the riparian area (surface and subsurface flow) is the main transport mechanism for dissolved C, N, and P. These nutrients can be taken up directly by primary producers and decomposers, passively transported to groundwater or the hyporheic zone, or carried to surface waters via subsurface, overland, or channelized flow. The hydrologic regime dictates the timing and magnitude of nutrient movement into aquatic systems, and can create instream pulses of C, N, and P both in particulate and dissolved form (Kaushal et al. 2010).

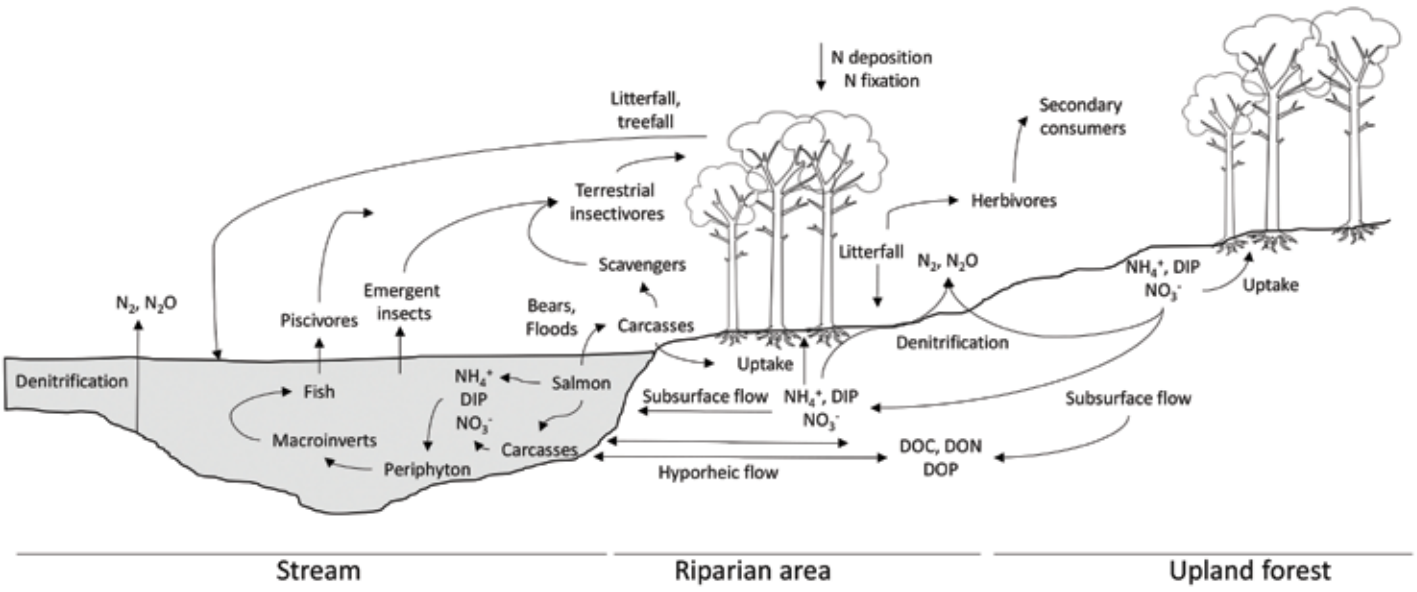


Figure 6.1. Nutrient cycle of an undisturbed PNW forested riparian ecosystem and connected stream and upland forest. Modified from Moyle et al. (2009). DIP = dissolved inorganic phosphorus; DOC, DON, DOP = dissolved organic carbon, nitrogen and phosphorus, respectively.



Most streams in the Pacific Northwest are nutrient-poor ecosystems/Ned Pittman, WDFW

Soil compaction and impervious surfaces typically reduce retention capacity of nutrients in space and time by preventing infiltration and thereby limit the interaction of nutrients with soils, roots, and soil biota. Riparian ecosystems exhibit a continuum of physical characteristics which have implications for nutrient dynamics. Riparian ecosystems along low-order streams, for example, are often narrower and steeper than those along mainstem rivers with wide, level floodplains. Consequently, surface and subsurface hydrological regimes controlling biogeochemical processes in riparian areas also differ along a continuum. Along small, steep forested streams, the water table is usually low and aerobic processes dominate, whereas level areas adjacent to larger rivers may provide water table conditions favoring anaerobic processes that reduce N via denitrification, a microbial transformation of dissolved nitrate N to gaseous molecular N (Burt et al. 2002; Hefting et al. 2004). The hyporheic zone is an area beneath the stream and riparian area where surface water and ground water continually interact. This zone can have a large influence on chemical characteristics of the surface water and, therefore, plays a role in determining biological attributes of streams (Wondzell et al. 2011).

As nutrient molecules move downstream, they may be taken up by algae and microbes living on rocks and wood in the channel in slick mats called biofilms (Cardinale et al. 2002). The polysaccharide layers of biofilms are sites of active nutrient turnover where microscopic algae, fungi, and bacteria consume N and P, die and release nutrients that then move further downstream. Microbial communities may be consumed by grazers such as larval aquatic insects or snails, which in turn may be consumed by larger predators such as fishes or birds. As prey and predators are consumed or die, they release nutrients to the aquatic and terrestrial environments through decay and in this way C, N, and P cycle in a process of uptake and release called nutrient spiraling (Newbold et al. 1982). The distance a molecule moves downstream during a complete cycle is its spiraling length, a metric that explicitly relates nutrient utilization to nutrient supply (Newbold et al. 1982). Long spiraling lengths indicate that: 1) nutrient uptake is inefficient because the system is saturated with nutrients and organisms

can no longer fully exploit the incoming nutrient loads, 2) conditions are not optimal for uptake, such as when water flow is too fast, or 3) the stream does not support a community of organisms that effectively processes the nutrients.

In anthropogenically undisturbed Pacific Northwest watersheds, nutrients are ultimately derived from atmospheric and geologic sources, while plants play an important role in the initial uptake of N and P from these sources (McClain et al. 1998). Spatial variation in vegetation, geologic substrates, and human activities drive the variation in stream N and P concentrations and fluxes across the PNW (Wigington et al. 1998; Wise and Johnson 2011). The geology and geomorphology of a watershed and stream channel set the conditions for mineral composition of the groundwater reaching the stream because the shape and slope of the channel and banks affect water movement and velocity. Some bedrock types yield high stream P (Ice and Binkley 2003), leading to high regional P variability in riparian ecosystems and streams. Some types of vegetation can fix atmospheric gaseous N via symbiotic relationships with bacteria in their root systems, and in turn produce more biologically available N than they consume, thereby contributing to N loads in watersheds. A prime example is N_2-fixing Red Alder *Alnus rubra*, an important source of dissolved N in streams in western Oregon and Washington (Compton et al. 2003; Wise and Johnson 2011; Greathouse et al. 2014).

Nitrogen may occur in organic forms as microbial, plant, or animal tissue and in dissolved organic forms, or, if inorganic, primarily as nitrate ($N0_3^-$) and ammonium (NH_3^+), which are forms that can be assimilated by organisms into organic molecules. Forests in the PNW generally have fairly tight N and P cycles with little N or P lost or leached from the system. Rather, there are low rates of N and P inputs and outputs, but high rates of internal cycling (Sollins et al. 1980; Compton and Cole 1998). Triska et al. (1984) showed that N inputs to a stream reach in an old-growth forest watershed in Oregon's Cascade Mountains were dominated by dissolved organic N from groundwater (69% of inputs), with litterfall and precipitation playing smaller roles.

Human activities like timber harvest, farming, or urban development alter nutrient cycles (Figure 6.2), producing higher fluxes, shorter storage durations, and higher concentrations of nutrients in subsurface flow, some of which will enter streams. Disturbances through forestry, grazing, agriculture or urbanization can alter the timing and routing of water through a landscape (Tague and Grant 2004), which can influence nutrient uptake and delivery to streams. Agriculture can contribute to excess nutrients in riparian and aquatic ecosystems through increased runoff of N and P from fertilizer and livestock manure (Wise and Johnson 2011). Point sources and urban stormwater runoff are the dominant sources of N within urban areas. For P, geologic materials dominate natural sources, with point sources such as urban runoff, farm manure, and fertilizer important in areas under anthropogenic land uses. Timber harvest increases stream nitrate and to a lesser extent phosphate concentration (Fredricksen et al. 1975; Scrivener 1975; Martin and Harr 1989). These increases generally persist for a short time, although Brown et al. (1973) saw increases in nitrate persist for six years post-timber harvest and burning.

Historically, a major source of allochthonous[1] nutrients and energy-rich carbon compounds was anadromous salmon (Cederholm et al. 1999; Gende et al. 2002). Anadromous, semelparous fish return from the ocean to spawn and die in their natal streams. The mass of every salmon carcass, of which 95% is accumulated in the marine environment (Naiman et al. 2002), is deposited in oligotrophic freshwater environments. The magnitude of nutrient and chemical energy losses to freshwater ecosystems caused by declines in salmon populations can best be appreciated by comparing current and historical salmon run sizes. Gresh et al. (2000)

1 Allochthonous means originating or formed in a place other than where found. Hence, in the context of aquatic ecosystems, allochthonous nutrients found in a stream originated in terrestrial ecosystems. In contrast, autochthonous means originating or formed in the place where found.



Historically, carcasses of adult salmon delivered approximately 100,000 tons of nutrients to rivers and streams of Washington/Ned Pittman, WDFW

estimated that the current biomass of salmon runs for all Pacific salmon species (Chinook *Oncorhynchus tshawytscha,* Coho *Oncorhynchus kisutch,* Sockeye *Oncorhynchus nerka,* Chum *Oncorhynchus keta,* and Pink *Oncorhynchus gorbuscha*) in Puget Sound, the Washington Coast, and the Columbia River Basin are 25, 5, and 1% of historical biomass (circa early 1900s), respectively. This represents a loss of 122,470 US tons per year (111,104 metric tons) of marine-derived nutrients and chemical-energy in these watersheds. Naiman et al. (2002) estimated that in the Willapa Bay Watershed the biomass of Chinook, Coho, and Chum Salmon carcasses in streams decreased from 2,920 to 226 US tons (2,649 to 205 metric tons per year), and that marine derived N and P decreased by more than 90%.

Figure 6.2 represents nutrient cycling in a watershed with more human-associated disturbance, including an

absence of salmon returns; by comparing Figures 6.1 and 6.2, changes in the cycling loop and intra-system transfers are evident when salmon are missing. Much of the cycling of marine-derived nutrients is mediated by predators and scavengers that move large amounts of marine-derived nutrients substantial distances into the terrestrial environment either as salmon carcasses or as metabolic waste products, i.e., urine and feces (Naiman et al. 2002). In several small streams on the Olympic Peninsula, Cederholm et al. (1989) observed that Coho Salmon carcasses were consumed by 22 species of mammals and fish (e.g., American Black Bear *Ursus americanus,* Northern River Otter *Lontra canadensis,* Mink *Mustela vison,* Bald Eagles *Haliaeetus leucocephalus,* and Ravens *Corvus corax*), and that 40% of salmon carcasses were moved by scavengers from the water to riparian areas. Flooding also can deposit salmon carcasses in riparian areas (Ben-David et al. 1998). Salmon carcasses provide N and P nutrients for microbes, plants, and animals, and influence all trophic levels in riparian ecosystems (Willson and Halupka 1995; Compton et al. 2006). Trees and shrubs in riparian areas along spawning sites in the Kadashan and Indian rivers of southeast Alaska derived approximately 23% of their foliar nitrogen from decayed salmon carcasses, and growth rates of Sitka Spruce *Picea sitchensis* were significantly increased (Helfield and Naiman 2001). On average, 17% of the nitrogen incorporated into the riparian vegetation of a stream in western Washington was derived from carcasses of spawning salmon, and significant percentages of marine-derived N (up to 30%) and C (up to 39%) were found in aquatic insects, Cutthroat Trout *Oncorhynchus clarkii*, and juvenile salmon (Bilby et al. 1996).

Other animals subsidize riverine food webs by transporting nutrients across watersheds or by altering the hydrology (Chapter 8 in this document; Naiman and Rogers 1997; Masese et al. 2015). As ecosystem engineers, American Beaver *Castor canadensis* have a significant influence on stream nutrients. Beaver can influence biogeochemical cycles by impounding streams and changing hydrologic regimes and organic matter and sediment transport (Pollock et al. 2007).

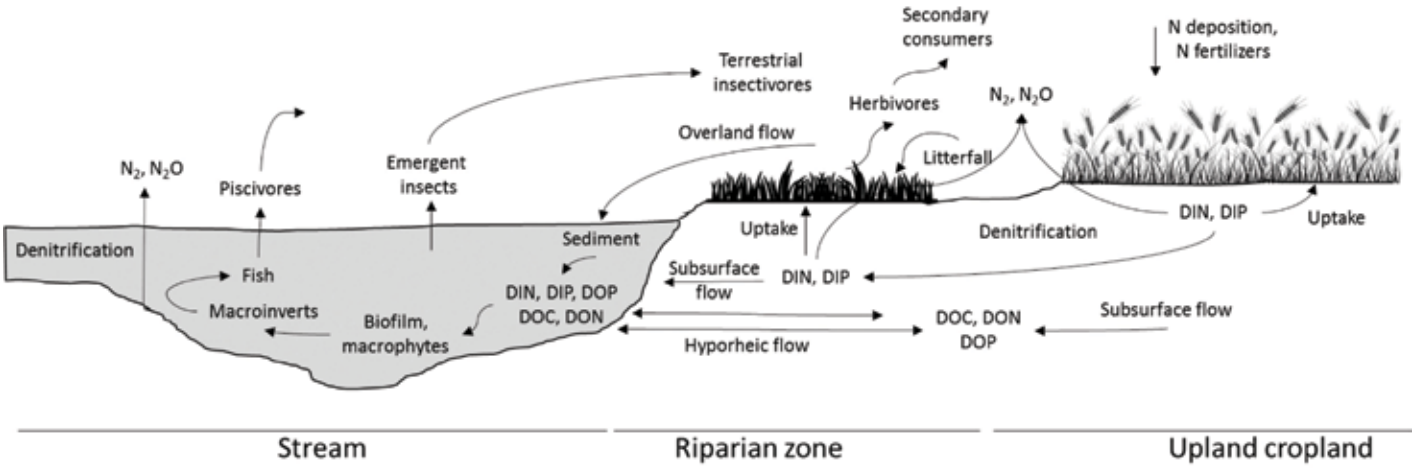


Figure 6.2. Nutrient cycle of a disturbed PNW riparian ecosystem and connected stream and upland cropland. Much of the cycling of marine-derived nutrients is facilitated by predators and scavengers that move nutrients into the terrestrial environment either as salmon carcasses or as urine and feces. Modified from Moyle et al. (2009). DIP = dissolved inorganic phosphorus; DIN = dissolved inorganic nitrogen (nitrate and ammonium); DOC, DON, DOP = dissolved organic carbon, nitrogen and phosphorus, respectively.

Retention of total N and P increased 72% and 43%, respectively after Beaver populations recovered in a Minnesota watershed (Naiman et al. 1994) and organic matter (carbon) retention increased three-fold after a stream was impounded by Beaver (Naiman et al. 1988). However, Beaver impoundments also influence N dynamics by flooding riparian forests, creating anoxic conditions in forest soils leading to an increase in denitrification and subsequent reduction in N (Naiman et al. 1988). Elk *Cervus canadensis*, deer (*Odocoileus* spp.), and livestock can also be important sources of N and P when found in close proximity to streams.

Riparian vegetation can affect uptake and delivery of nutrients to streams. Riparian plant roots can slow water movement and stabilize soils as well as take up dissolved nutrients. The types of vegetation and growth patterns in riparian areas determine the amount and timing of litterfall and woody material delivery to a stream. The height and density of vegetation dictate shading and solar input to the stream, thus affecting conditions for plant growth and N and P uptake. The key limiting nutrients for primary production in PNW streams are N and P (Welch et al. 1998), but there has not been enough experimental work conducted across the region to determine precisely when and where this occurs.

Shallow groundwater adjacent to stream channels often is a hot spot for N removal processes and a storage zone for other solutes.

6.1.2. Carbon

The cycling of C in riparian and aquatic ecosystems is complex and can differ among locations and through time because C can be available in different forms and is produced by different sources, thereby affecting its transport and fate. Carbon is tightly linked to N and P, driving biological transformations of these nutrients. Organic C regulates ecosystem functions in streams and rivers because dissolved organic carbon (DOC) is a primary energy source for microorganisms. Riparian vegetation in forests influences DOC composition and contributes a substantial proportion of stream organic C budgets (McDowell and Likens 1988). DOC in streams is a mixture of recalcitrant, (i.e., difficult to process components) and more easily metabolized labile fractions that drive biogeochemical processes involving nitrogen (Kaushal and Lewis 2005). For example, availability of dissolved and particulate organic C can limit denitrification, a microbial process critical to maintaining water quality, which has important implications for managing N in streams (Newcomer et al. 2012). Denitrification occurs only under anaerobic conditions where microbes shift from respiring oxygen to respiring nitrate, releasing nitrous oxide, and inert N_2 gas. These conditions may be ephemeral, fluctuating in response to water tables and associated changes in redox potential (Mayer et al. 2010b).

Anoxic conditions also promote the production of methane. Production of methane and nitrous oxides, increase in riparian areas with increased organic C supply (Kaushal et al. 2014). Dissolved organic carbon also can increase biological oxygen demand, thereby reducing oxygen for fish (Stanley et al. 2012).

Various organic C types from biofilm, leaves, and soil organic matter may have differential effects on ecosystem functions in forested streams (McDowell and Likens 1988), agricultural streams (Royer and David 2005), and urban streams. For example, C derived from

grasses supports more denitrification than C from tree leaves (Newcomer et al. 2012). Because the microbes that influence the transport and fate of N in riparian ecosystems require C as an energy source, C and N are inextricably linked in a biogeochemical sense.

Shading of small headwater streams in forested watersheds can obscure 95% of sunlight (Murphy 1998); hence, in-stream productivity is typically light-limited. Consequently, the main energy source for such streams is allochthonous chemical energy contained in litter from riparian areas (Conners and Naiman 1984; Bisson and Bilby 1998). In headwater streams, litter directly supports an animal community compromised predominantly of invertebrate detrivores which, in turn, support a community of invertebrate predators (Wallace et al. 1997). Detrivores, microbes, and physical breakup convert the coarse particulate organic material (CPOM) of litter to fine particulate organic material (FPOM) which is utilized by invertebrate communities downstream (Bisson and Bilby 1998; Richardson and Danehy 2007). Headwaters comprise 60 to 80% of the cumulative length of a watershed's drainage network (Benda et al. 2005); hence, headwaters contribute a substantial amount of chemical energy to mainstem rivers and associated biota. For example, Wipfli (2005) estimated that every kilometer of fish-bearing stream received enough energy from headwaters to support 100 to 2,000 young-of the-year salmonids.

Carbon cycles through riparian ecosystems via CO_2 uptake from the atmosphere through photosynthesis, litterfall, decomposition and/or consumption. Riparian litter is a critically important source of C for streams as energy for invertebrates and microbes that form the basis of food webs. Deciduous-dominated riparian forests grow quickly and initially deliver more litter to streams and have a more pronounced seasonal litter contribution than coniferous-dominated forests (Hart et al. 2013). Conifers, however, play an important structural role as large wood in streams. Deciduous species like Red Alder can increase fine litter flux and



The main energy source for small headwater streams is allochthonous chemical energy provided by leaf litter/Marc Hayes, WDFW

nutrient delivery to terrestrial and aquatic food webs, thus complementing the year-round shade and wood provided by conifers (Hart et al. 2013).

Chemical energy, required by heterotrophic organisms (those that do not produce their own food from sunlight), is contained within the various C compounds of organic matter. The fundamental effects of organic matter on ecosystem composition, structure, and functions have motivated conceptual theories to describe riverine ecosystems (Pingram et al. 2012). The River Continuum Concept (RCC; Vannote et al. 1980) describes the balance of allochthonous C (produced externally to the stream) to autochthonous C (produced in-stream) in riverine ecosystems from headwaters to mainstem rivers. This balance plays a key role in structuring the invertebrate community. According

to RCC, in narrow headwater streams (first to third order), nearly all C is allochthonous produced by litter from riparian vegetation because shade severely limits the production of autochthonous C produced through in-stream photosynthesis. Because medium-sized streams (fourth to sixth order) are wider, shading decreases, in-stream photosynthesis increases, and the density of litter inputs decreases. Hence, the quantities of allochthonous and autochthonous C may be about equal. In large rivers (≥ seventh order), shading effects only a small portion of surface water, however, turbidity and water depth limit photosynthetic production. Consequently, according to RCC, the main source of energy in large rivers is allochthonous C from upstream. The RCC also posits that the quantity and quality of organic matter, which changes along the river continuum, affects the composition of the aquatic invertebrate community.

Litter from riparian areas is clearly an important source of limiting nutrients and organic matter for aquatic ecosystems. Consequently, providing adequate amounts of litter to streams is an important issue for riparian area management and addressing this issue requires an understanding of litter delivery into streams. FEMAT (1993:V-26) developed a conceptual model, known as the FEMAT curves, that depicts relationships between riparian ecological functions, including litterfall, and distance from a stream channel. Bilby and Heffner (2016) studied factors influencing litter delivery into streams in young and mature conifer forests of the western Washington Cascades and found that litter travel increased with increasing tree height, topographic slope, and wind speed. They estimated that riparian buffer widths needed to capture 95% of annual litter input from mature conifer forests to streams are between 60 to 83 ft (18 to 25 m) depending on a site's slope and wind exposure. The mean tree height of their three mature forest sites was 154 ft (47 m). Hence, riparian buffer widths needed to meet the 95% capture objective range from 39 to 54% of mean tree height. Bilby and Heffner (2016) warn that they may have underestimated litter travel distances because they released litter from only the bottom of the tree canopy, but litter travels farther with increasing height, and therefore, litter produced within the tree canopy is likely to travel farther.

While stream flows carry organic matter, insects, and other invertebrates downstream to subsidize food webs in higher order streams, there may also be upstream movement of aquatic organisms that subsidizes food webs in lower order streams. In a Welsh mountain stream, for example, amphipods *Gammarus pulex* showed net upstream movement whereas stonefly (*Trichoptera* spp.) females showed no upstream flight preference, but females moving upstream contained twice as many eggs (Dudley-Williams and Williams 1993). In many cases, however, such as with mayflies (family Baetida), seasonal upstream movements of adults via an aerial pathway are pronounced (Hershey et al. 1993). Such upstream movement of nutrients and chemical energy may be important, but has been little studied.

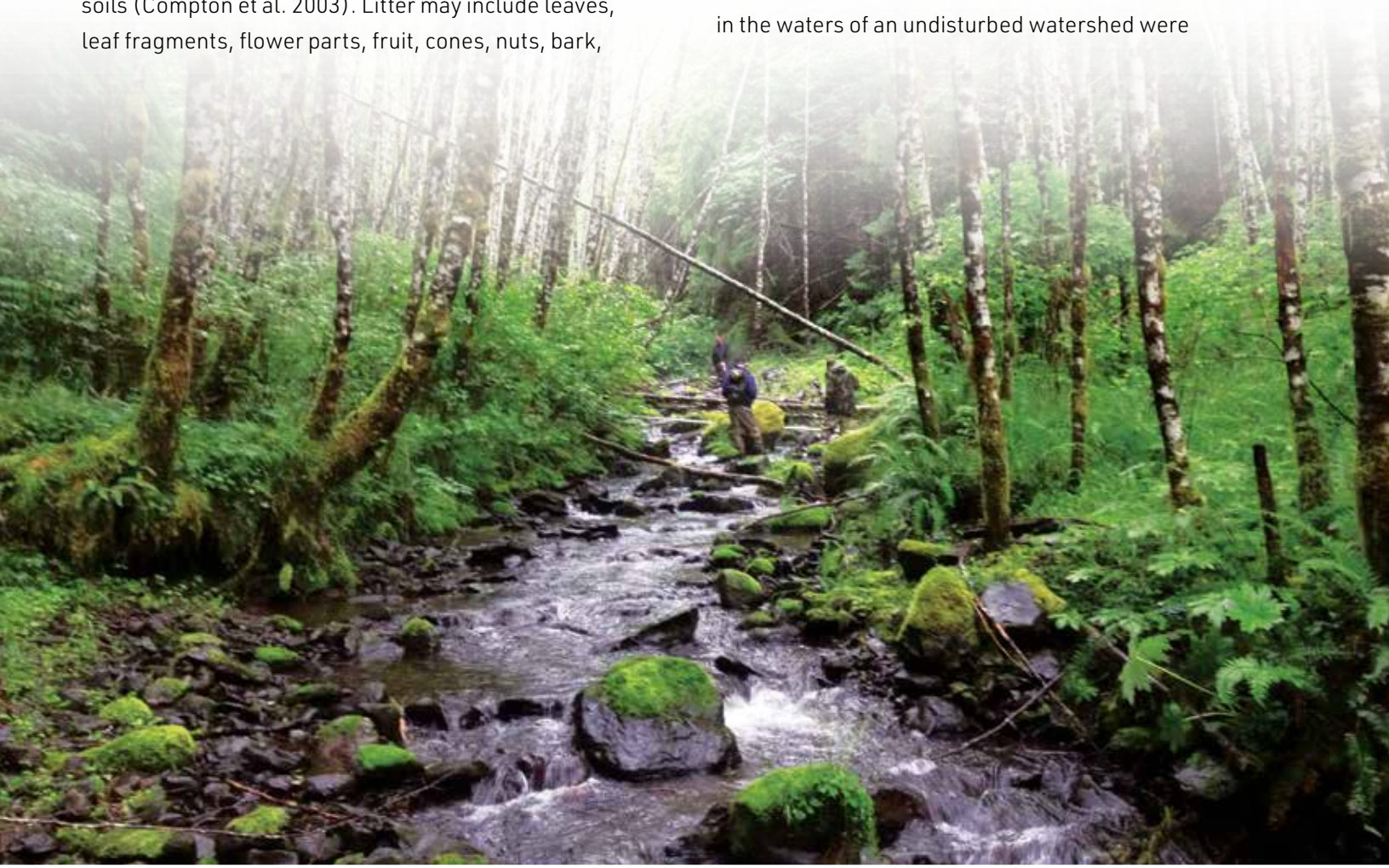
Large wood in stream channels can affect nutrient cycling by slowing the downstream transport of water, sediment, organic matter, and other materials (Chapter 3). Large wood in riparian areas ultimately decomposes, providing nutrients to the forest floor thereby increasing moisture holding capacity (Harmon et al. 1986). Woody material in streams can be a direct source of labile C to streams that can fuel microbial processes, though most C in wood is relatively recalcitrant, taking years or decades to decompose. Wood slows the flow of water thereby extending the residence time of water in the channel and facilitating accumulation of finer organic and inorganic sediments (Chapter 2) that support biofilms.

6.1.3. Nitrogen

Nitrogen is a component of proteins, necessary for all life, and often is a limiting nutrient for both terrestrial and aquatic organisms. N limitation of plant growth is common in PNW forests (Peterson and Hazard 1990). Ultimately, N comes from atmospheric N_2, which has a very strong triple bond that, aside from lightning and industrial processes, only a few specialized N-fixing organisms can break.

Nearly all N in lotic ecosystems of Washington is derived from allochthonous sources, and in undisturbed headwater watersheds, the source of nearly all N is terrestrial. Nitrogen can enter a river or stream via several pathways: litterfall, movement of soluble N from riparian soils into groundwater and hyporheic zones, and leaching and subsurface transport from upland soils (Compton et al. 2003). Litter may include leaves, leaf fragments, flower parts, fruit, cones, nuts, bark, branches and twigs (Benfield 1997), however, leaves account for 72% of total litter in broad-leafed forests and 80% in needle-leaved forests (Xiong and Nilsson 1997). Litter may enter surface waters through direct fall, lateral movement along the ground, or mobilization during floods.

For a headwater stream in the western Cascades of Oregon, Triska et al. (1984) found that more than 90% of annual N inputs to the stream were derived from biotic processes in the adjacent forest. Seventy-three percent of N entering the stream was dissolved organic N in water flowing through the subsurface from forest to stream and 21% was contained in organic matter (e.g., leaf litter, needles, and coarse woody debris) from the riparian forest. The headwater stream exported 74% of its annual N inputs to downstream waters; 22% of the exported N was contained in particulate organic matter. Edmonds et al. (1995) found that nitrate concentrations in the waters of an undisturbed watershed were



N-fixation by Red Alder is an important component of nutrient cycling in forests of western Washington and Oregon/Ned Pittman, WDFW

seasonal, with in-stream concentrations being highest in the fall and lowest in the summer when N uptake by terrestrial vegetation was greatest.

Red Alder fixes N_2 and enriches soil with N compounds through root and nodule secretions. Red Alder leaves contain N concentrations roughly 2 to 3.5 times greater than leaves or needles of other tree species (Tarrant et al. 1951). Because aquatic ecosystems in undisturbed watersheds are often N-limited, Red Alder can be a major source of allochthonous N to aquatic ecosystems, and more Red Alder litter can increase ecosystem productivity. For example, Wipfli and Musslewhite (2004) found that headwater streams with more Red Alder canopy cover exported greater biomass of both terrestrial and aquatic invertebrates to fish-bearing waters than riparian areas with less alder. This subsidy of prey from headwaters to fish-bearing streams is needed to maintain fish productivity (Wipfli and Baxter 2010).

Nitrogen cycles in the environment through multiple redox states, in solid, dissolved, and gaseous forms, and originates from multiple sources, making for one of the most challenging biogeochemical cycles to monitor and characterize (Figure 6.3). Shallow groundwater adjacent to stream channels often is a hot spot for N removal processes and a storage zone for other solutes (Hinkle et al. 2001; Zarnetske et al. 2011). The groundwater–surface water interface is characterized by dynamic gradients of dissolved oxygen, N, and organic C concentrations where biogeochemical reactions take place, including metabolism of organic C, denitrification, and nitrification (Sobczak et al. 2003). Denitrification is generally considered the most important biological process through which ecosystems lose N. Denitrification, and disturbances like tree harvest and fire, remove N from an ecosystem, whereas N uptake by plants eventually returns N to the system through litterfall or senescence and subsequent microbial decay. Organic C is required as an energy source for denitrification. Small streams can lose nitrate

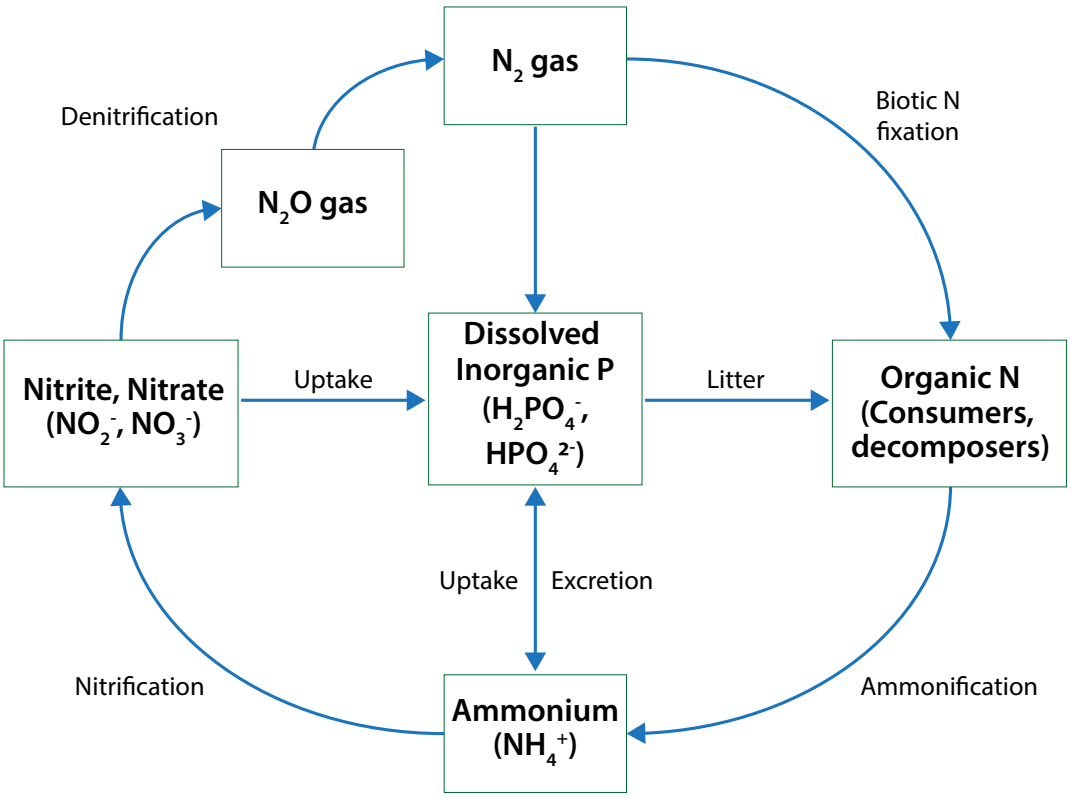


Figure 6.3. Nitrogen cycle pools and processes in ecosystems.

N efficiently because of their high ratio of streambed area to water volume, which brings more surface water in contact with the hyporheic zone. Small streams have a large cumulative influence on N transformation and loss because they account for most of the stream length within a network (Alexander et al. 2000; Peterson et al. 2001). Larger streams lose nitrate N because of longer transport distances over which more biological reactions can occur that consume N coupled with longer water residence times and higher N concentration which fuels the denitrification along with organic C (Mulholland et al. 2008).

Increased groundwater–surface water interaction can alter dissolved oxygen concentrations and redox conditions (Striz and Mayer 2008; Zarnetske et al. 2012), transporting N- and C-containing organic matter to microbes in subsurface sediments, leading to N loss via denitrification under favorable oxidation–reduction conditions (Hedin et al. 1998). The conditions that favor denitrification may change rapidly over time and space. Therefore, "hot spots" may form where denitrification occurs in small patches of the stream (e.g. under leaf packs) or "hot moments" where denitrification rates are high but for short periods of time due to rapid dynamic water movement (McClain et al. 2003; Vidon et al. 2010). However, biochemical processes in urban riparian soils such as denitrification may be impaired because of increased rates of erosion and limited groundwater–surface water interaction due to high proportions of impervious surfaces (Groffman et al. 2002).

The importance of riparian vegetation on transforming N inputs has been examined (Sweeney et al. 2004; Mayer et al. 2007; Sweeney and Newbold 2014). Riparian area characteristics such as width of vegetation, soil carbon, and hydrologic flowpaths, can influence the amount of N removed. Mayer et al. (2007) surveyed the available scientific literature containing data on riparian management and N concentration in streams and groundwater to identify relations between N uptake and riparian width, hydrological flow path, and vegetative cover. Removal efficiencies ranged from <0 (i.e., where the riparian ecosystem appeared to be a N source) to 100%, with a median removal rate of 91%. Wide vegetated riparian areas (>165 ft; 50 m) more consistently removed significantly higher proportions of N entering riparian areas than narrow bands of vegetation (0 - 82 ft; 0 - 25 m). The critical conclusions from this review were that riparian areas were effective at trapping and removing N when they were vegetated, wider, and allowed for subsurface movement of water where the interaction of nutrients dissolved in the water had prolonged contact with soils. Therefore, the hydrologic connection of riparian areas and streams is key to effective nutrient capture. Where channels are incised, riparian areas tiled for drainage, or where floodplains are disconnected via reinforced banks or channelization, nutrients will flow downstream with little interaction with riparian areas.

Subsurface hydrology (saturated vs. unsaturated soil conditions) and redox condition appear to be significant determinants of N-removal efficiency, regardless of vegetation (Mayer et al. 2007; Mayer et al. 2010b). When the water table fluctuates in response to precipitation events, buried relict hydric soil may become saturated, producing sub-oxic or anoxic conditions (Hefting et al. 2004; Weitzman et al. 2014), facilitating N removal. Where flow paths move through wetland riparian soils, great potential exists to remove large quantities of N in proportion to the loads (Jordan et al. 2011); where flows occur via deeper groundwater dynamics or via tile



Riparian vegetation: Red Elderberry Sambucus racemosa*/ Ned Pittman, WDFW*

drainage, N in solution may bypass the C-rich riparian soils and flow through zones where less potential exists for nutrient removal (Wigington et al. 2005). Hydrologic connectivity between riparian areas and streams is a critical factor in determining N removal rates.

Denitrification rates in the stream channel are linked to the organic C content of benthic sediments, respiration rates, and extent of stream water interaction with the streambed (Alexander et al. 2000; Mulholland et al. 2008), conditions that can be fostered by woody material (e.g., sticks, branches or tree trunks), and debris dams in streams. Woody material may function as microsites or hotspots of elevated biogeochemical cycling including denitrification (Groffman et al. 2005), and provides substrates for bacteria and fungi, which in turn consume N in streams (Ashkenas et al. 2004).

Biofilms are a matrix of algae, bacteria, and fungi embedded in a slick polysaccharide film that coats hard substrates in streambeds. These microbial communities consume, respire, and reduce inorganic N (Mulholland et al. 1995). Physical habitat heterogeneity and the biodiversity of the biofilms influence N uptake (Cardinale et al. 2002; Cardinale 2011). Biofilm structure, composition, and capacity for biogeochemical cycling are influenced by substrate composition, light penetration, nutrient concentration, flow rates, seasonality, sediment composition, and the community of invertebrate grazers in the vicinity (Sabater et al. 2002). Biofilms formed on wood substrates have been found to have higher respiration rates and greater N demand than biofilms developed on rock substrates (Sabater et al. 1998). Lazar et al. (2014) found that biofilms on wood substrates in a forested stream had significantly higher denitrification rates than those on non-organic substrates such as stone. In an old-growth forest system in Oregon, aquatic mosses and biofilm on large wood showed the highest N uptake rates among biota while, both vertebrate and invertebrate consumers took up substantial amounts of N, especially small invertebrate grazers (Ashkenas et al. 2004).

Furthermore, N in the stream was transported to the upland through uptake by terrestrial plants, likely through long, subsurface flow paths, demonstrating a strong link between terrestrial and aquatic systems (Ashkenas et al. 2004).

In addition to the biofilms on the streambed, microbial communities within the hyporheic zone can be hotspots for N dynamics. At the HJ Andrews Experimental Forest in Oregon, Zarnetske et al. (2011) found that the hyporheic zone was an important site for N dynamics in small forested streams, with residence time determining the dominance of different N transformation processes. Water pathways with residence times of less than 7 hours tended to be dominated by DO and DOC use as well as ammonium and nitrate production, while pathways with longer residence times removed N via denitrification. Further modeling suggested that water residence times and oxygen uptake rates of microbes are important determinants of whether hyporheic zones are net sources or sinks of nitrate N (Zarnetske et al. 2012). In large rivers like the Willamette, hyporheic zones can be important areas for nitrate removal from regional groundwater prior to entry into surface flow (Hinkle et al. 2001), as well as important for N removal and cooling as water moves in and out of hyporheic areas on its path downstream (Fernald et al. 2006).

The relationships between land use and N transport and fate can be complex, and are mediated by aquatic and riparian biota. Sobota et al. (2012) showed that N uptake differs substantially across forested, agricultural, and urban streams in the Willamette River basin in Oregon. Most nitrate N in forested streams was transported downstream without being taken up. N storage was high in algal biomass in unshaded agricultural and urban streams but turnover and subsequent recycling back to the stream may ultimately be high (Sobota et al. 2012). Collectively, this work indicates that uptake via heterotrophic organisms living on large wood is critical to long-term N capture in forested streams. Once the canopy is opened up, autotrophic algal production

becomes a more important process for uptake of excess nutrients, which leads to shorter-term storage and potential for negative consequences associated with freshwater algal blooms.

6.1.4. Phosphorus

Phosphorus (P) is an important component of adenosine triphosphate (ATP) and necessary for energy transformations in plant and animal cells. Like N, low P availability often limits primary production on land and can be particularly limiting to productivity in freshwater. This is because P tends to form complexes and be retained in soils and thus does not move as readily into ground and surface waters from the landscape as does nitrate N. P cycles in the environment through multiple organic and inorganic forms (Figure 6.4). P occurs in the environment in organic forms (e.g., organo-phosphate and polyphosphates like ATP) in plant and animal biomass, sewage, and pesticides. Inorganic forms of P, such as phosphate (PO_4^{3-}), and orthophosphate, are biologically reactive and thus can be used directly by plants and microorganisms (Carpenter et al. 1998). Orthophosphate is derived from phosphate-bearing minerals, fertilizers, detergents, and industrial chemicals. In the Pacific Northwest, bedrock is the major source of stream P loads, with fertilizer, manure, and wastewater inputs important in some locations (Wise and Johnson 2011). Overabundance of P can result in abnormally high primary production in water, leading to water quality problems such as algal blooms, production of cyanotoxins, and low oxygen events (Carpenter et al. 1998; Jacoby and Kann 2007).

P is commonly a limiting nutrient in aquatic ecosystems because it is highly insoluable and has an affinity for binding to soil particles. Nevertheless, riparian areas are sources of allochthonous P to streams in undisturbed watersheds. The amount of P that is contributed by riparian areas to aquatic habitats through litterfall

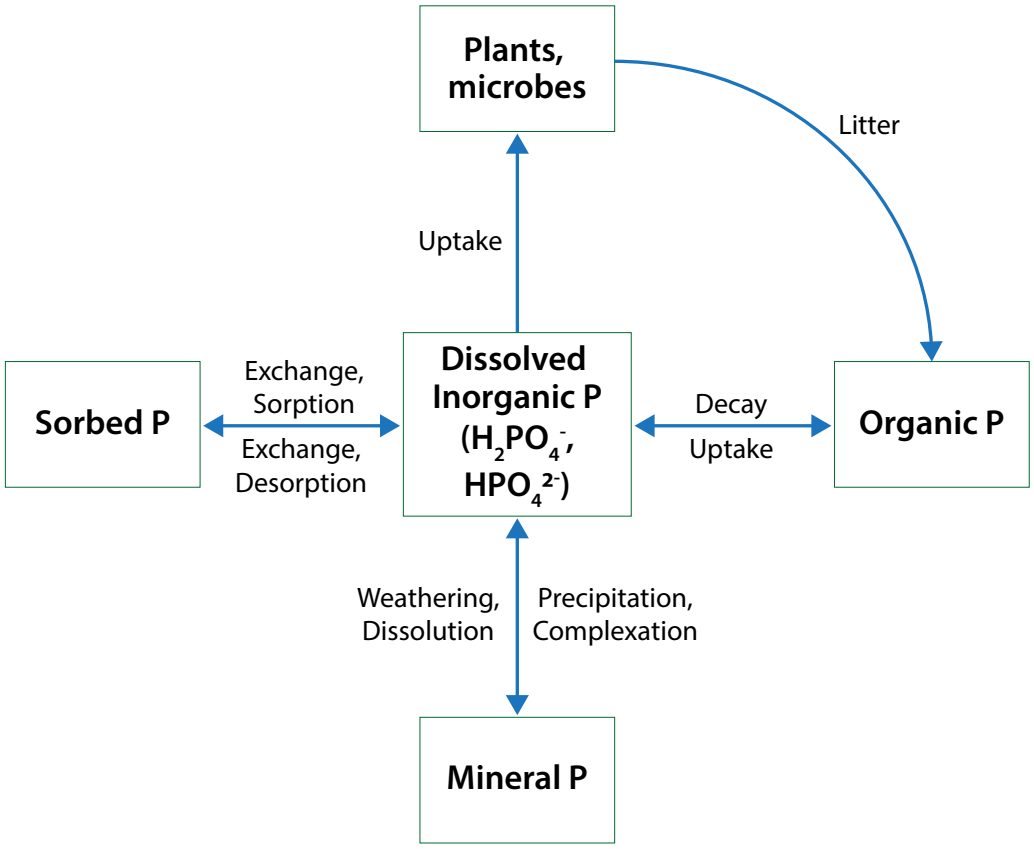


Figure 6.4. Phosphorus cycle pools and processes in ecosystems.

relative to other sources under natural, undisturbed conditions has yet to be quantified for riparian ecosystems in the Pacific Northwest.

P attenuation refers to declines in P concentration in water and soil through physical, chemical, and biological processes. Mineral content and pH are important factors determining P attenuation in soil. Because of their volcanic origins and the weathering environments, many soils in the PNW can bind tightly to large quantities of anions like phosphate, replacing reactive soluble P forms for particulate P forms, which are less biologically reactive (Johnson and Cole 1980; Bohn et al. 1985). Sorption, the chemical attachment of molecules to soil particles, may occur quickly (e.g., days) and includes adsorption and substitution between P and other anions on mineral surfaces. Sorption may also occur slowly (e.g., weeks), such as mineral dissolution and precipitation reactions between P and soil cations such as Ca and Mg or Al, Fe, and Mn oxide compounds depending on soil pH (Bohn et al. 1985). Phosphate is most soluble in slightly acid to neutral pH soils. Under reducing conditions, Fe is reduced and the P-Fe oxide compounds may dissolve, thereby releasing P (Denver et al. 2010). Minimally disturbed forests have a relatively tight P cycle, with low inputs from precipitation, and even lower leaching rates (Yanai 1992; Compton and Cole 1998). In the volcanically influenced soils of the Cascades, most of the ecosystem P is contained in soil, and organic and inorganic forms of sorbed P are the dominant forms as opposed to primary minerals or microbial P (Compton and Cole 1998). There is substantial recycling of P by plants and soil and biotic release of organic P via phosphatase enzyme activities is an important component of this cycle (Giardina et al. 1995). Several studies have shown that Red Alder increases rates of P cycling (Giardina et al. 1995; Zou et al. 1995), further supporting the important role that Red Alder plays in regulating both N and P nutrient cycles of the PNW. Vegetated riparian areas generally are expected to retain P by slowing water flow and by plant and microbial uptake.

Unlike N, which is ultimately constrained by atmospheric fixation and regulated by biologic cycling, P availability is controlled by weathering and a complex set of chemical and biological processes. P retention is regulated by the equilibrium P concentration (EPC), the concentration at which P sorption equals desorption (Hoffmann et al. 2009). Once soil P has reached its sorption capacity, excess P may be exported in water (Domagalski and Johnson 2012). Biological processes also play a role in P attenuation and release (Schechter et al. 2013). Bacteria, fungi, algae, and plants incorporate P into biomass; however, plants vary in P demand and uptake effectiveness, exhibiting numerous strategies for sustaining growth and maintenance (Shen et al. 2011). P is released from organic matter through decomposition, which is dependent on pH, litter quality (C:N:P ratios), Ca content, redox potential, soil moisture, and temperature (Schechter et al. 2013). Increases in P loading as well as soil disturbance and erosion have the potential to reduce this generally tight P cycle and increase transfer to aquatic ecosystems (Figure 6.2).

Microbial and plant uptake represent short-term, transient P pools (Richardson and Marshall 1986). Phosphate may be assimilated into plant tissues or in microorganisms but released upon death and senescence. Peat accumulation and P sorption and precipitation are important long-term P sequestration mechanisms (Richardson and Marshall 1986; Reddy et al. 1995). Long-term storage of P depends on sorption to inorganic sorbents; P sequestration is mainly associated with adsorption to Fe and Al oxides in acidic soils or precipitation of Ca phosphates in alkaline soils (Giesler et al. 2005). Phosphorus retention mechanisms differ widely depending on hydrological pathway through the riparian area. Sorption and desorption reactions are more important during subsurface flow, while sedimentation of particulate P may be the major retention mechanism during overland flow. Significant amounts of P can be stored in stream sediments and may be resuspended and released during storms. Retention of total P in riparian areas is controlled

mainly by sedimentation processes, dependent on morphology (e.g., width) and vegetation characteristics. However, riparian areas can become a net source of dissolved P released from soil or from plant material (Hoffman et al. 2009). Retention of dissolved P in riparian areas is often not as significant as retention of particulate P (Hoffman et al. 2009). Inundation of riparian areas or floodplains can deposit particulate P whereas plant uptake may temporarily immobilize P (Hoffman et al. 2009). Overall, riparian ecosystem retention efficiency varies widely and some riparian areas may become sources of P, especially ortho-phosphate (Schechter et al. 2013). Total P moving through the soil is not necessarily related to the width of the riparian area but rather on flow path and soil types (Hoffman et al. 2009; Schechter et al. 2013).

6.2. Hydrologic Connectivity and Nutrient Dynamics

Nutrients cycle at various spatial and temporal scales. Soils, vegetation, and water flows largely dictate the sources and processing of nutrients. Nutrients may enter the riparian ecosystem from the atmosphere (e.g., nitrogen oxides produced from fossil fuel combustion or ammonia released from agricultural areas), from terrestrial sources when rainwater flushes nutrients from upland soils and vegetation, or from floods that

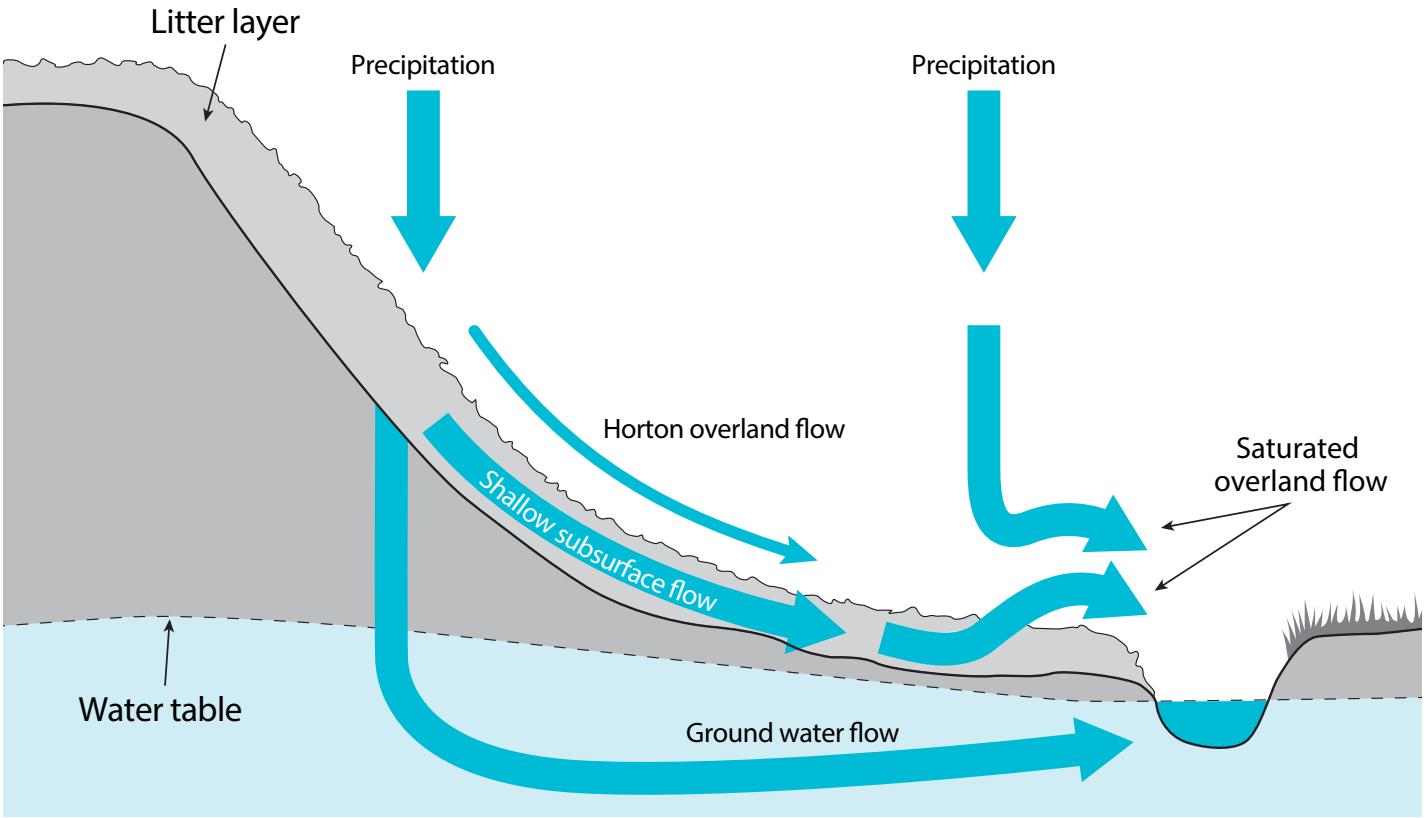


Figure 6.5. Water flow paths. Precipitation reaches a stream as surface runoff and by infiltration into the ground where it contributes to groundwater flow. The amount of water following each flow path depends on the capacity of the soil to absorb water, the amount of storage in surface depressions, and the amount, intensity, and duration of precipitation (image adapted from Stream Corridor Restoration Handbook; FISWRG, 1998).

bring in nutrients from upstream areas (Figure 6.5). As water moves downstream, it moves into and out of the hyporheic zone, carrying with it dissolved nutrients that react with the sediments and biota living in the interstitial spaces of the sediments (Fernald et al. 2006). Wondzell (2011) suggests that hyporheic exchange is likely to be most important in small streams but that hyporheic exchange through sand-bedded streams is substantial and may have an important influence on nutrient loads of large rivers. Regardless, large fractions of N are removed via denitrification in hyporheic sediments at all scales from headwater streams to large rivers (Peterson et al. 2001; Mulholland et al. 2004; Alexander et al. 2007).

Hydrology is the driving force for a range of physical and biogeochemical processes controlling retention and flux of nutrients entering the riparian ecosystem (Chapter 2). Nutrients may originate from neighboring areas via local flow systems throughout the riverscape, from regional groundwater flow systems, especially along reaches of the higher stream orders, or from a recirculation of river water in riparian areas during flooding (Dahl et al. 2007). Depending on flood intensity and frequency, water may overflow the streambanks and move into the floodplain where sediments may be deposited or, conversely, litter, woody material, and sediments may be mobilized and transported into the main channel.

Many floodplains in the Pacific Northwest are highly altered by human activities and are often artificially disconnected from stream channels by levees. Subsequently, natural flooding processes and nutrient exchange, both deposition and production, are severely altered often with negative consequences to riparian habitat.

Discharge volume, stream flow velocity, and temporal variability in flow, coupled with nutrient concentrations dictate the mass loading of each nutrient flowing downstream. Headwater streams commonly make up 75% or more of the total stream channel length in drainage basins (Benda et al. 2004) and have a disproportionately profound influence on the water quality and quantity for downstream ecosystems (Peterson et al. 2001). Alexander et al. (2007) found that fluxes from first-order headwater streams accounted for 70% of water volume and 65% of the N flux occurring from second-order streams. Research comparing perennial, intermittent, and ephemeral stream nutrient cycling processes indicates that flow intermittency can affect the concentrations, fluxes, and forms of nutrients moving from streams into downstream ecosystems (Von Schiller et al. 2011).

In western Oregon and Washington, floodplains experience extremes in water and sediment flux (Naiman et al. 2010). Floodplains often have saturated soils and shallow, upwelling groundwater. Such wet conditions influence N processing by creating anoxic, denitrifying conditions in organic soil horizons (Burt et al. 2002). However, many floodplains of the PNW are highly altered by human activities and are often artificially disconnected from the stream channel via levees constructed to convert lands to agriculture or other uses. Subsequently, nutrient exchange during flood events between aquatic and riparian ecosystems, via both mobilization and deposition of dissolved and suspended organic matter, is severely altered. River restoration often focuses on reconnecting floodplains and associated riparian areas to stream channels in order to restore natural hydrology and re-establish nutrient cycling functions (Bernhardt et al. 2005; Craig et al. 2008). The hydrologic interactions of uplands and

riparian soils control nutrient cycling and transport (Mayer et al. 2007; Weitzman et al. 2014). Therefore, it is critical to maintain riparian vegetation and to control soil erosion and nutrient runoff from uplands (Mayer et al. 2007; Hoffman et al. 2009; Zhang et al. 2010; Sweeney and Newbold 2014).

Impacts to riparian ecosystems may include historic events not well documented and not easily recognized today. Such impacts may lead to erroneous understanding of baseline conditions or misidentification of pristine areas. For example, recent research suggests that legacy sediments, referring to sediments deposited in floodplains from historic upland erosion in response to deforestation and construction of milldams and ponds, have altered nutrient cycling in riparian ecosystems throughout the mid-Atlantic region of the US (Walter and Merritts 2008; Merritts et al. 2011). Much of the fine sediment carried by these streams during storms is from streambank erosion, which often includes legacy sediments, thereby contributing substantially to sediment and nutrient loads in streams (Gellis and Noe 2013). While milldams may not have been as common in the Pacific Northwest, splash dams created to move logs downstream were common throughout the region historically until the mid-20th century (Phelps 2011). These dams and other historic logging activities may have altered riparian systems in ways not easily recognized today but which may have had a significant legacy effect on sediment deposition in floodplains. For example, splash dam releases exceeded the effects of 100-year flood events in headwater regions and were comparable to 100-year flows in lower reaches (Phelps 2011). Splash dams also may have contributed to simplification of stream channels when rocks and debris jams were removed to facilitate log transport (Sedell and Luchessa 1981; Wohl 2000). Overall, the long-term effects of splash dams are not well documented nor are they accounted for in current riparian assessments.



South Fork Sauk River/Wendy Cole, WDFW

Precipitation and runoff are master variables regulating transport and transformation of C, N, and P in watersheds (Dosskey et al. 2010; Vidon et al. 2010). The interaction between land use and climate variability can increase the amplitude and frequency of nutrient pulses, effecting rapid and large changes in concentrations and fluxes of materials (Kaushal et al. 2014). Shifting patterns in runoff and temperature due to land use and climate variability can amplify pulses of greenhouse gases (GHG) such as CO_2, CH_4, and N_2O emanating from watersheds (Kaushal et al. 2014). For example, Vidon et al. (2014) showed strong N_2O pulses in response to storm events in a riparian wetland. Warming increases production of some GHGs in wetlands (Inglett et al. 2012) because temperature affects reaction kinetics and equilibria. Higher stream temperatures may increase rates of both bacterial consumption of nutrients and production of GHGs in streams and rivers (Kaushal et al. 2014). Recent research shows that groundwater may also warm in response to climate (Menberg et al. 2014).

Most N and P enters receiving waterbodies during storm events and during cooler seasons when temperatures are lower than optimal for microbial activity (Kaushal et al. 2010) or when plants are senescent. During drought, residence times may be long, leading to more denitrification in riparian soils, however N loads may be small overall because stream flow may be much lower than normal (Mayer et al. 2010b; Filoso and Palmer 2011). However, drought may also lower moisture levels in riparian soils, potentially reducing the occurrence of anoxic conditions required for denitrification (Groffman et al. 2003). Conversely, high flow conditions during "flashy" storm events may greatly compromise nutrient retention processes (Booth 2005) flushing far more solutes downstream including N and P (Cooper et al. 2014). Consequently, high flows are also responsible for the vast majority of particulate C, N, and P transport in most streams (Alexander et al. 2000; Moore and Wondzell 2005).

Stream channel geomorphology and geologic setting, especially stream channel width, depth, and sediment lithology strongly influence groundwater behavior. In turn, nutrient movement in riparian ecosystems is dependent upon groundwater, which can be highly variable and follow preferential flow paths. Striz and Mayer (2008) showed that groundwater movement may shift considerably depending on seasonal precipitation trends. Streams may be gaining, that is, receiving water from the uplands when precipitation is high, or losing surface water to the ground when soils are dry and drought conditions prevail. Water movement through deep groundwater flow paths back to the stream can take years or decades (Hinkle 2009) and in some cases there is very little exchange with regional deep groundwater (Vaccaro 2011).

Mass removal of nutrients and contaminants in streambed sediments is dependent upon residence times because microbial processes, such as denitrification, require time for complete reaction (Zarnetske et al. 2012). Nutrient concentrations in soils and water may vary on time scales across minutes and hours as plants or algae take up nutrients. Yet, seasonal and annual cycles are also evident based on flow and temperatures. Nutrients may also vary on spatial scales of millimeters to meters depending on plant distribution or litter deposition, and can also vary at regional and global scales depending on land use, geomorphology, and precipitation patterns.

A better understanding of the role hyporheic connections play in the processing of nutrients will improve our ability to design riparian management strategies that protect water quality.

6.3. State of Riparian Nutrient Dynamics Science

Recent advances in stream nutrient research reveal spatially and temporally variable processes and resulting pulses of nutrient transformation, storage, and release that can differ among locations and through time at the same locations. We also know that freshwater and riparian ecosystems vary tremendously across the PNW based on soils, climate, organisms, and human activity. Because most stream nutrient research originates from case studies, the application of case study results to novel conditions should be done cautiously.

Most studies of riparian nutrient dynamics have been conducted in forested watersheds; grassland and desert ecosystems in our region are less well studied but share some common processes and dynamics. Much of the information provided here demonstrates that riparian areas can have important effects on nutrient transfer from land to water, which subsequently have implications for ecosystem goods and services (e.g., water for drinking, swimming, fishing, boating, etc.) and habitat conditions for aquatic species.

Generally, if the goal of riparian management involves nutrients, management should include efforts to shorten nutrient spiraling lengths, increase nutrient retention, provide substrates to support riparian food webs, and maintain natural shading in order to minimize algal blooms. However, stimulating algal and plant growth is one way to shorten nutrient spiraling lengths by enhancing nutrient uptake, at least temporarily as nutrients will be returned after senescence. A longer-term goal of riparian management is to avoid excessive nutrient delivery to streams. Maintaining riparian



The larvae of many caddisfly species use silk to make protective cases, which are often strengthened with gravel, sand, and twigs/ Ned Pittman, WDFW

vegetation, soil conditions, and flowpaths, etc. will fascilitate the removal of nutrients from surface and subsurface flow before entering the channel. If nutrient input is successfully controlled, light levels promoting algal blooms become much less of an issue.

Some of the critical gaps in our understanding occur where physical sampling for detecting water and material movement is most difficult. This occurs in the soil subsurface, the streambed, and hyporheic zones where determining flow dynamics requires multiple sampling wells (Striz and Mayer 2008) or surrogate measures such as stream temperature (Stonestrom and Constantz 2003). A better understanding of the role hyporheic connections play in the processing of nutrients will improve our ability to design riparian management strategies that protect water quality (Hinkle et al. 2001; Zarnetske et al. 2011, 2012), particularly by expanding these studies to better

represent the range of conditions in Washington. However, the use of stable isotopes of N, P, C, and also O and H in water have helped to illuminate some of the more obscure processes like water movement into and out of trees (Brooks et al. 2010) and the uptake of N along entire stream reaches (Ashkenas et al. 2004). Satellite monitoring data (e.g. GRACE) and lidar imaging, which can provide high-resolution topographic data for inaccessible areas, are proving to be valuable tools for the study of nutrient dynamics at the watershed scale. Drone technology may eventually further provide local and current information on condition and environmental variables. Coupling these new data sources with the development of powerful computer models (e.g., VELMA) that predict watershed-scale nutrient movement (Abdelnour et al. 2011; Abdelnour et al. 2013) will greatly enhance our ability to extrapolate field level data to watershed scales and to test land use riparian management scenarios and climate change impacts on nutrient cycling behavior.

6.4. The Role of Management

Litter from riparian areas is clearly an important source of limiting nutrients and chemical energy for aquatic ecosystems. Inorganic nutrients, such as those in artificial fertilizers, do not mimic the foodweb role of litter because inorganic nutrients feed the autotrophic components of foodwebs, such as algae. Litter feeds heterotrophic components of foodwebs, such as benthic macroinvertebrates, many of which are prey for resident salmonids and juvenile salmon. Consequently, providing adequate amounts of litter to streams is an important issue for riparian area management. The results of Bilby and Heffner (2016) suggest that 95% of full litter delivery to streams can be achieved with buffer widths between 40 to 60% of site-potential tree height, depending on site conditions. Numerous factors dictate the transport and fate of nutrients through riparian systems. Managing riparian systems to limit negative impacts of nutrients on downstream resources is inherently complex. The role of management is largely to offset the impacts of human activities that increase nutrient loads and runoff, exacerbate the impacts of nutrients, and/or alter the fluxes of nutrients. Table 6.1 identifies impacts of human activities in the context of factors influencing riparian areas and describes practical management and restoration approaches that are known to mitigate nutrient impacts. The primary objective with respect to offsetting nutrient impacts among all categories of land use is to maintain existing riparian systems, restore degraded systems, and plant riparian buffers where they do not currently exist. Overall, management should focus on where in the watershed important nutrient dynamics that affect aquatic system integrity (or fish life) occur, and how to reduce or ameliorate various human disturbances that can affect nutrient dynamics at those places.

Although salmon runs and associated nutrient fluxes have declined over time in Oregon, Washington, Idaho, and California (Gresh et al. 2000), salmon could still play an important role in stream ecosystems by greatly increasing the quantity of salmon carcasses planted in streams or by greatly increasing harvest escapement (Gende et al. 2002). Addition of inorganic nutrients will not mimic the food web role of salmon in PNW watersheds because they do not directly mimic the complex organic matter from salmon carcasses supplied to heterotrophs such as aquatic insects and juvenile salmonids (Compton et al. 2006). Maintaining structures, such as large wood, and processes that retain nutrients are expected to allow greater utilization of salmon-derived nutrients in aquatic food webs.

Table 6.1. Major factors influencing nutrient dynamics in riparian ecosystems and the role of management in reducing impacts

Factors influencing riparian areas	Impacts of human activities	Role of management in reducing impacts
Land use - agriculture	Excess nutrient application and leaching into groundwater and surface water	Improve nutrient management to reduce nutrient loading - right time, right place, right source, right rate (4Rs)
	Compaction and vegetation damage from poor livestock management near streams	Protect and restore riparian areas to attenuate sediment and nutrient loads
	Riparian disturbance or lack of natural vegetation in riparian area	Protect and restore riparian areas to reduce light inputs that drive algal overproduction and eutrophication
Land use - urbanization	Impervious surfaces increase nutrients and sediment transfer to surface waters	Disconnect direct runoff from impervious surfaces to streams to control nutrient and sediment inputs
	Increased nutrient application via yard fertilizer and pet waste	Educate the public and incentivize behaviors to reduce nutrient loads
	Leaky and ineffective sewer and septic systems	Improve sewer systems, sewage treatment, storm drainage, and septic systems
Land use - forestry (harvest and road building)	Small increase in nutrient loadings	Seek alternatives to clear cutting and protect riparian areas
	Small to moderate increase in sediment transport	Seek alternatives to clear cutting; improve harvest practices, slope and soil management, and road construction; and protect riparian areas
Forest age and composition	Recent clear-cuts may lose the most nutrients	Extend harvest rotations because mature forests likely retain more nutrients than young forests
	Red Alder fixes large amounts of N, which remains in the system and contributes to productive soils of the Coast Range and western Cascades mountains	Recognize the role that Red Alder forests can play in stream nutrient levels
Climate and seasonality	Rapid movement of water during fall and winter rains, sometimes bypass riparian zones	Slow water movement across the landscape
	Rapid N cycling during the summer but low flows mean this inorganic nitrogen accumulates in the soil, fall rains displace this N and transport it to streams	Consider timing of fertilizer applications
	Spring season usually has peak algal blooms because nutrient supplies are high as is light availability before full leaf out.	
	Slower processing of nutrients in cold weather, although conifer trees take up nurients year round	
Elevation and topography	Steep slopes lead to higher rates of runoff and sediment transport	Minimize disturbance to vegetation and soils on steeper slopes through forest and pasture management

Table 6.1. CONTINUED
Major factors influencing nutrient dynamics in riparian ecosystems and the role of management in reducing impacts

Factors influencing riparian areas	Impacts of human activities	Role of management in reducing impacts
Hydrology	Reduced connection between the channel and floodplain can limit nutrient uptake	Reconnect flood plains to increase water residence times, which can increase ground water-surface interactions and nutrient uptake
Nutrient concentrations, forms, and inputs	High concentration and multiple sources of bioavailable nutrient forms may overload capacity of riparian systems to process nutrient loads	Consider terrestrial versus atmospheric sources; carefully manage synthetic fertilizer and manure applications, and balance N and P
Soil properties and geology	Low permeability reduces infiltration and interaction with soils	Practice good soil management because rich, fertile soils can contribute organic carbon for denitrification
	Sandy soils can transmit more water and nutrients (e.g., pumice soils and septic systems)	Recognize that some soils are better at adsorbing P (e.g., volcanic and highly weathered soils)
Biota	Declines in salmon runs reduces supply of nutrients and organic matter for invertebrates, birds, mammals, and other fish	Restore salmon populations, which increases nutrients in ecosystem: nutrients are assimilated by vegetation, consumed by animals, and converted by microbial processes

6.5. Conclusions

Riparian areas are important sources and sinks of organic matter and nutrients for streams. Numerous sources of C, N, and P exist, each taking various organic and inorganic forms, and each moving through the environment continuously along multiple paths at various temporal and spatial scales. Transfers may be via subsurface flow, direct input of materials via litterfall, treefall, or animal movement. Nutrient and energy subsidies from riparian areas to streams and rivers have profound effects on the composition, structure, and functions of aquatic ecosystems.

In watersheds where excess nutrients are polluting surface waters, hydrology and flow paths are critically important when considering potential for nutrient removal by riparian areas. If a riparian area is physically disconnected from the stream, flow paths may not carry materials through the riparian area, particularly into the hotspots with appropriate conditions for denitrification, and thus N removal will not occur as readily. Thus, maintaining hydrologic connections between riparian areas and stream channels are critical. This includes allowing natural seasonal patterns of flow including flooding.

Historically, many watersheds in Washington have seen substantial inputs of salmon-derived N, P, and organic matter. Riparian areas serve as the critical connection for transferring these nutrients to uplands via animal consumption, plant uptake, and biogeochemical cycling.

Results of a large review of riparian ecosystem studies across the globe indicated that vegetated riparian areas were more effective in trapping N than unvegetated ecosystems, but that the type of vegetation did not matter tremendously. Wider riparian areas were more effective in N removal across studies (see Chapter 5).

N-fixation by Red Alder is an important component of nutrient cycling in forests of western Washington and

Oregon. In the PNW, deciduous riparian forests tend to produce more litter with higher nutrient content and nutritional quality for stream food webs than conifer riparian areas. However, conifers have a longer lifespan, produce larger wood and are a more consistent source of shade. In riparian areas with a mixture of deciduous and conifer trees, deciduous species enhance litter flux and nutrient delivery to terrestrial and aquatic food webs, thus, complementing the provision of shade and large wood by conifers. Both the food web and structural roles of tree species should be considered in riparian management plans in order to support aquatic production.

Structurally diverse habitats with variability in geomorphology and soils are likely to support correspondingly diverse biota including vegetation, animals, and microbial communities that will be best able to process and assimilate nutrient loads. Headwaters are especially controlled by riparian processes and thus, are important zones of active nutrient processing that can significantly affect downstream transport of nutrients. Therefore, maintaining riparian areas in headwater systems may be disproportionately important to stream function. Similarly, maintaining hydrologic connection of streams with their floodplains is important because rich, organic sediments are deposited on floodplains during flood events. Conversely, channelization and stream incision from erosion disconnects streams from their floodplains, causes flashy flows, further incises stream channels while starving floodplains of regular resupply of organic matter, and can lower groundwater tables below the rooting zone thereby contributing to the reduction of riparian vegetation in arid climates.

While more research will be necessary to answer important questions about nutrients in riparian ecosystems, the science is very clear about the importance of the condition of riparian areas on the flows of nutrients through stream systems. Riparian areas and their streams are much more than conduits for nutrients from the uplands to downstream systems; they are vitally important locations for the short- and long-term supply, storage, and transformation of nutrients.



Perennial fruiting bodies, or conks, of a polypore fungi/Ned Pittman, WDFW

6.6. Literature Cited[2]

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Big Creek Trail/Rachel Blomker, WDFW



Chapter 7. Riparian Areas of the Columbia Plateau

By: George F. Wilhere

This chapter is dedicated Karin Divens who passed away unexpectedly on 12 October 2017. Karin made a significant contribution to this chapter by organizing a two-day, multi-disciplinary workshop that advanced our scientific understanding of riparian areas in the Columbia Plateau Ecoregion. Karin was an effective and well-respected habitat biologist at WDFW, who brought not only science to her work but a full heart.

7.1. Introduction

The Columbia Plateau Ecoregion (sensu Omernick 1987),[1] is classified as a cold desert (Sleeter 2012), and covers about one-third of Washington State (Figure 7.1). In the driest parts of the ecoregion, a rain shadow cast by the Cascades Mountains limits precipitation to 6 to 9 in (15 to 23 cm) per year, and even wettest parts of the ecoregion, the Palouse Hills Subregion, receive only 18 to 23 in (46 to 58 cm) per year (Bryce and Omernik 1997). Uplands of the Columbia Plateau are covered by either shrub-steppe or steppe[2] vegetation (i.e., sagebrush and bunchgrass communities, respectively), and, most notably, lack trees (Franklin and Dyrness 1988). The ecoregion's desert climate confines nearly all trees to riparian areas.[3]

Seventy-five years ago Daubenmire (1942) wrote, "The vegetation of the unforested regions in the Pacific Northwest has been less thoroughly studied and is consequently less perfectly understood than is that of the forested areas." The situation has not changed. Most of what is known about riparian areas in the Pacific Northwest is based on research conducted in forested ecoregions. During my review of the scientific literature, I found far less information about the composition, structure, and functions of riparian ecosystems in unforested ecoregions, such as the Columbia Plateau, than I found for forested ecoregions. However, many of the basic principles and qualitative relationships that have emerged from research in forested ecoregions are also valid in unforested ecoregions. For instance, while there are significant quantitative differences among ecoregions in the amount of wood or shade provided by riparian areas, the physical processes of large wood recruitment and stream shading should be very nearly the same. On the other hand, processes that are strongly affected by groundwater, such as nutrient dynamics and pollutant removal, should be different. To clarify current

[1] There are several different delineations of ecoregions (e.g., USFWS 1994; Bailey 1995; Olson et al. 2001). For this report WDFW used the ecoregions of Omernick (1987). The only non-forested ecoregion in Washington is the Columbia Plateau. Forested ecoregions surrounding the Columbia Plateau in Washington are the Eastern Cascades, North Cascades, Okanogan, Northern Rockies, and Blue Mountains.

[2] Steppe is also referred to as grassland or prairie. The steppe region of southeastern Washington is called the Palouse.

[3] A notable exception is the Juniper Dunes Wilderness Area, which preserves the northernmost Western Juniper Trees *Juniperus occidentalis* in North America. This 7100-acre area contains no surface water.



The amount of rain received by the Columbia Plateau Ecoregion each year is insufficient to support trees in the uplands/Justin Haug, WDFW

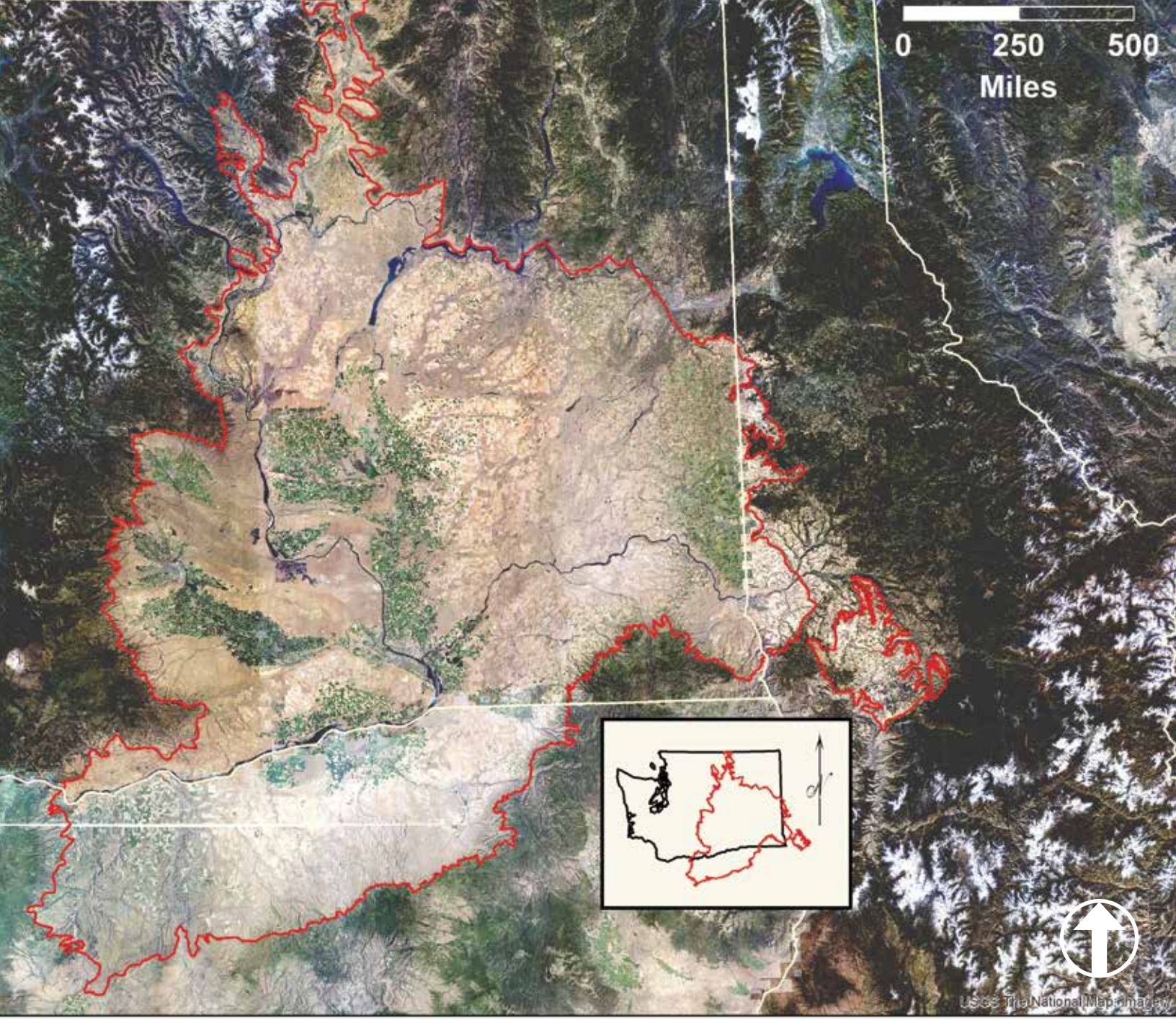


Figure 7.1. Boundary (in red) of the Columbia Plateau Ecoregion. State boundaries are white. Aerial photography for Washington State done in 2015 by the National Agriculture Imagery Program.

scientific understanding, throughout this chapter I point out differences between riparian areas in forested and unforested ecoregions.

The Columbia Plateau Ecoregion is comprised of both arid and semi-arid subregions (hereafter collectively known as drylands). Due to lack of information, I make few subregional distinctions regarding riparian areas. Most of what is known about the ecology of dryland riparian areas is based on research conducted in desert ecoregions of the southwestern United States (Patten 1998). Although these ecoregions have climate, hydrology, soils, and vegetation different from the Columbia Plateau, many of the basic principles and qualitative relationships that have emerged from research in other desert ecoregions should be valid for the Columbia Plateau.

7.1.1. Dryland Riparian Areas

Decades ago, the term "riparian" referred exclusively to areas adjacent to surface waters with moist soils that support distinctive vegetation (e.g., Thomas et al. 1979, Anderson 1987). Later definitions expanded the meaning of riparian. Sedell et al. (1989) and Naiman et al. (1992), for example, divided the "riparian ecosystem" or "riparian area" into two zones: a "riparian zone" with moist soils supporting wetland and riparian-dependent vegetation, and an upland "zone of influence" that significantly influences the exchanges of energy and matter between terrestrial and aquatic ecosystems (Figure 7.2). In forested ecoregions, the potential vegetation of both zones is commonly forest, and the ecological functions of the zones are similar. In the Columbia Plateau, vegetation within riparian ecosystems often exhibits an abrupt demarcation between the two zones. Phreatophytic[4] trees and shrubs and hydrophytic[5] herbaceous plants are confined to moist streamside areas, but the upland zone of influence may consist of sagebrush or bunchgrass communities. Consequently, the functions of the two zones may be quite different. Along some reaches, the riparian zone and zone of influence may both reside within a floodplain and exhibit similar composition and structure. For our purposes, the phrases riparian ecosystem and riparian area are synonymous.

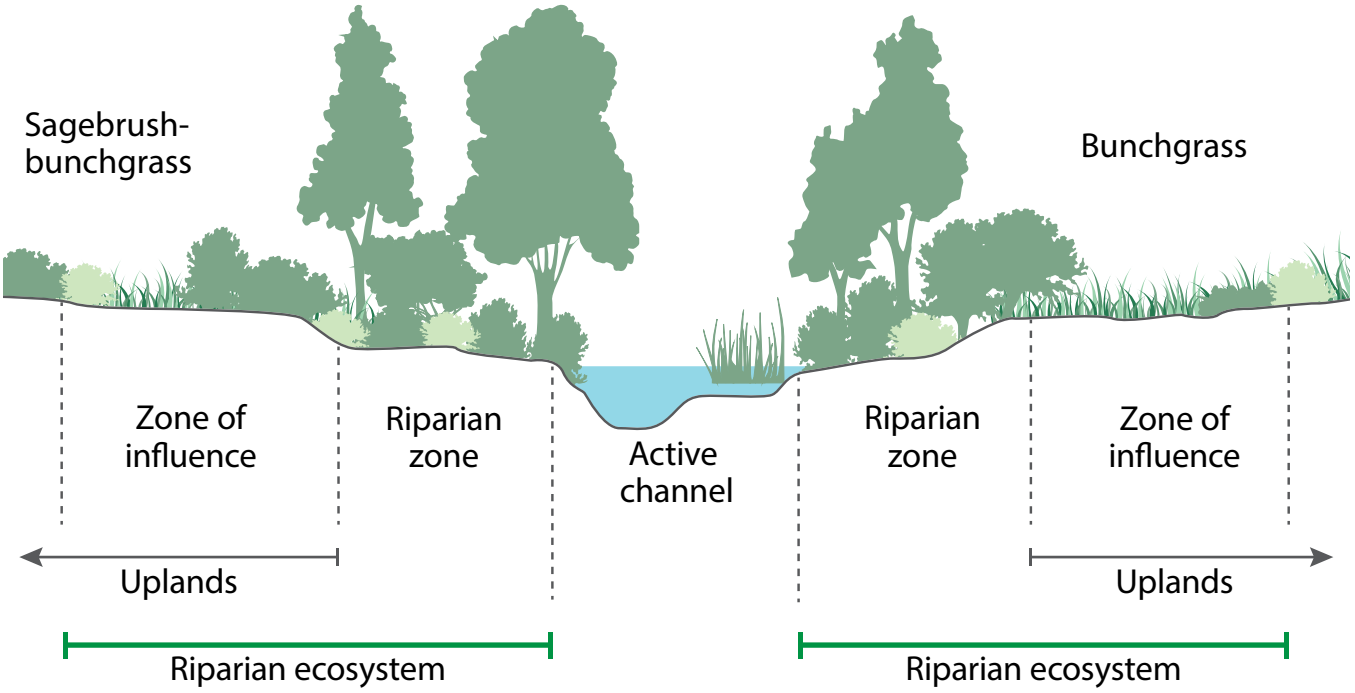


Figure 7.2. Dryland Riparian Ecosystem. The riparian ecosystem consists of two zones: riparian and zone of influence. The riparian zone extends from the edge of the active channel towards the uplands. This zone includes areas where terrestrial biota are influenced, at least periodically, by surface or subsurface waters. Beyond this is the riparian "zone of influence." This includes areas where ecological functions significantly influence the stream (diagram modified from USFS 2004).

[4] A phreatopyhtic plant is a species that obtains water from the subsurface zone of saturation either directly or through the capillary fringe (Thomas 2014).
[5] Hydrophytic plants are those that are adapted to growing conditions associated with periodically saturated soils. They include obligate wetland plants that almost always occur in wetlands under natural conditions, facultative wetland plants that usually occur in wetlands but are occasionally found in non-wetlands, and facultative plants that equally likely to occur in wetlands or non-wetlands (Lichvar et al. 2012).



In the semi-arid Columbia Plateau Ecoregion, trees are generally confined to riparian areas/Scott Fitkin, WDFW

In dryland ecoregions, riparian ecosystems are the ultimate expression of groundwater and surface-water interactions (Webb and Leake 2006). Soil moisture and water table elevation are key variables in the survival of riparian-dependent plants. Stream discharge affects soil moisture by saturating soils and recharging the alluvial aquifer during overbank flooding, and stream stage (i.e., surface elevation) directly affects water table elevation.

In dryland ecoregions, trees and dense shrubs exist only near surface water, such as a river, stream, or lake. In the Columbia Plateau, surface streamflow is highly dependent on its source. Rivers and perennial[6] streams generally originate in the adjacent mountainous ecoregions (Omernik and Gallen 1986), and their peak flows, if unaffected by dams, generally occur during fall or winter storms and/or during spring snowmelt (Reidy Liermann et al. 2012). Within the Columbia Basin, the flow source of most streams is groundwater (Reidy Liermann et al. 2012), and consequently, during the hot, dry summer, many streams originating within the ecoregion are intermittent (Daubenmire 1942; Bryce and Omernik 1997). This spatial and temporal variability in local hydrology affects the distribution, abundance, and species of plants in dryland riparian areas.

[6] A perennial stream is one which flows continuously. An ephemeral stream, or section of stream, is one that flows only in direct response to precipitation. It receives no water from springs and no long-continued supply from melting snow or other surface source. An intermittent stream is one that flows during protracted periods when it receives water from some surface or subsurface source, such as melting snow or a spring (Meinzer 1923).

The diversity[7] of riparian climax plant communities in the Columbia Plateau Ecoregion is greater than the diversity in surrounding forested ecoregions. In forested ecoregions, the potential natural vegetation of nearly all riparian areas along rivers and streams is forest. The species composition may vary, but the climax community's structure ultimately attains a closed-canopy of trees, with the upland zone of influence most often dominated by conifer species. In the Columbia Plateau, differences in hydrology and geomorphology manifest substantial site-level differences in composition and structure of riparian vegetation (Hough-Snee et al. 2015). A rudimentary classification system based on overstory conveys obvious differences in vertical structure: tall tree, short tree, tall shrub, shrub, grass-like, grass, and forb (Figure 7.3; Crawford 2003). The main tall tree types have an overstory consisting of Black Cottonwood *Populus trichocarpa*, White Alder *Alnus rhombifolia*, or Quaking Aspen *Populus tremuloides*. Short tree types have an overstory of Thinleaf Alder *Alnus incana*, Water Birch *Betula occidentalis*, or Black Hawthorn *Crataegus douglasii*.[8] Tree vegetation types are usually multi-layered with shrub and herbaceous layers under the tree canopy. Common shrubs are Redosier Dogwood *Cornus sericea*, Common Snowberry *Symphoicarpos albus*, Lewis' Mockorange *Philadelphus lewisii*, and Woods' Rose *Rosa woodsii*. Tall shrub vegetation types include those dominated by willow species (e.g., Yellow *Salix lutea*, Sandbar *S. exigua*) which can be up to 20 ft (6 m) tall.

The structural diversity of riparian vegetation in the Columbia Plateau causes differences in site-level functions. Large wood recruitment, for instance, cannot occur in all riparian areas, and the amount of stream shading will vary considerably due to site-to-site variation in vertical structure.



The most diverse and productive biological communities of the Columbia Plateau are riparian areas/Rex Crawford, WNHP



Nearly all woody vegetation in riparian areas of the Columbia Plateau consists of deciduous shrubs and trees/Scott Fitkin, WDFW

[7] Measures of biological diversity take into account two factors: species richness (i.e., the number of different types) and evenness (i.e., the relative abundance of different types). While the richness of riparian climax plant communities in forested ecoregions may be comparable to that of dryland ecoregions, the relative abundance of different riparian climax plant communities is more even in dryland ecoregions. This results in a greater diversity of types.

[8] Black Hawthorn might also be considered a tall shrub. Crawford (2003) reported Black Hawthorn in riparian areas to be 6 to 20 ft (2 to 6 m) tall, and Daubenmire (1970) found Black Hawthorn up to 27 ft (8 m) tall.

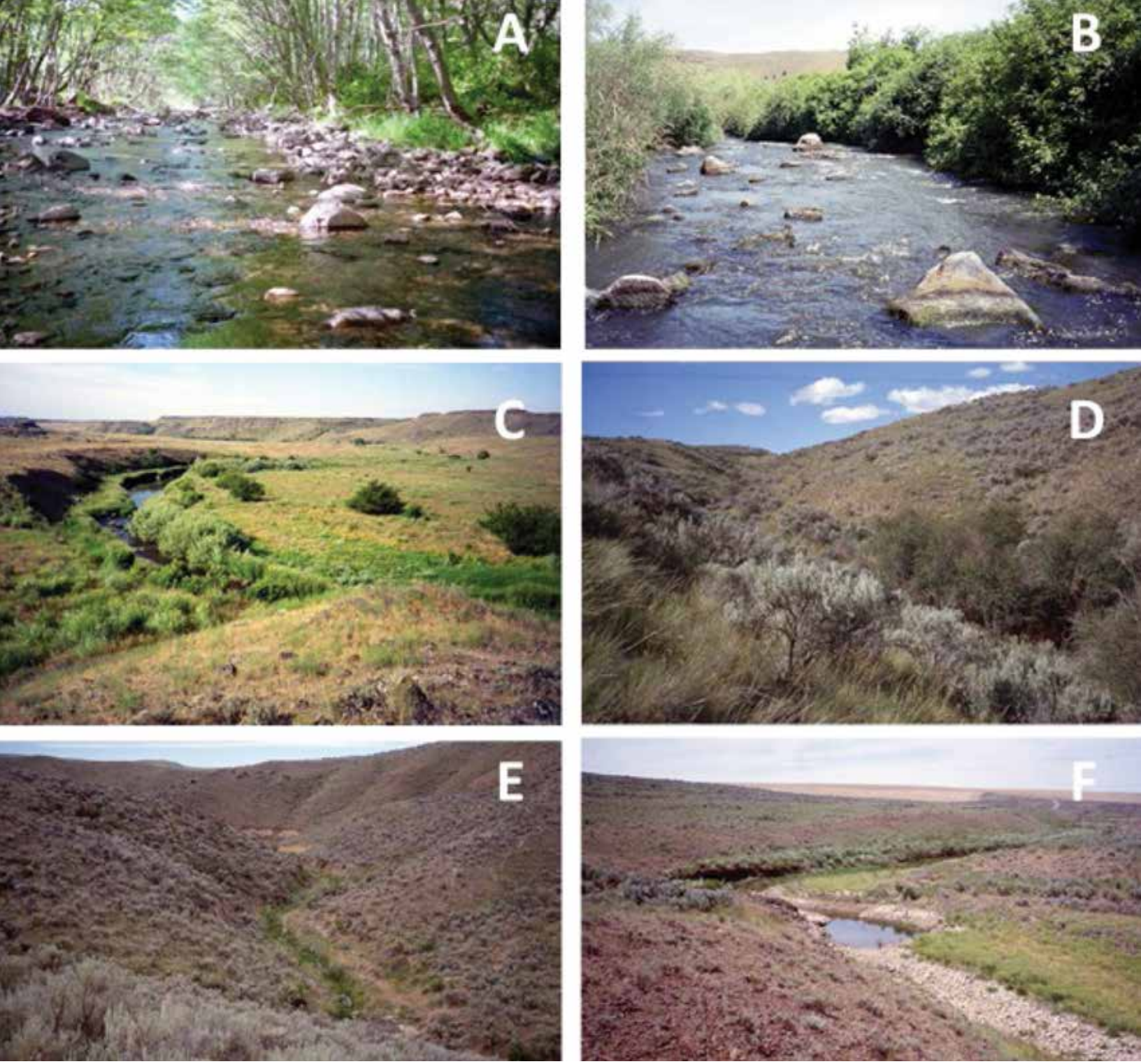


Figure 7.3. Different riparian vegetation structure types: A) tall tree, B) short tree, C) tall shrub, D) shrub on an intermittent stream, E) grass-like, F) forb/Rex Crawford, WNHP

7.2. Historical Context

Because western Washington and Oregon have a substantial amount of national park, wilderness, and roadless areas, the scientific literature contains many descriptions of unmanaged, natural riparian areas within forested ecoregions (e.g., Fonda 1974; Campbell and Franklin 1979; McKee et al. 1982; Sedell and Swanson 1984; Pabst and Spies 1999; Latterell and Naiman 2007; Fox and Bolton 2007). In the Columbia Plateau Ecoregion, however, nearly all riparian areas have been significantly impacted by human land use (grazing, intensive agriculture), resource exploitation (Beaver *Castor canadensis* trapping, timber harvest), water management (dams, diversions, reservoirs), or invasive species (Reed Canary Grass *Phalaris arundinacea*, Russian Olive *Elaeagnus angustifolia*). Daubenmire wrote in 1942, "few typical remnants of the original prairie and desert remain. These relics of the primeval vegetation likewise seem to be heading toward nearly complete extermination within a few years . . ." In short, the conditions of natural riparian areas in the Columbia Plateau Ecoregion are effectively unknown to science.

7.2.1. Beaver Trapping

The first major ecological impacts of Europeans on riparian areas in the Columbia Plateau Ecoregion were due to American Beaver (hereafter Beaver) trapping. In the early 1800s, Beaver hats were very fashionable and in high demand across Europe. The Hudson's Bay Company was determined to profit from that demand, and to obtain Beaver skins it managed a network of forts or trading posts throughout the Pacific Northwest (and throughout western North America). Several were established in and around the Columbia Plateau: Spokane House at the mouth of the Little Spokane River in 1810; Fort Okanagan at the confluence of Okanogan and Columbia rivers in 1811; a temporary post from 1812 to 1813 near confluence of Snake and Clearwater rivers; Fort Nez Perces[9] near the Walla Walla and Columbia rivers' confluence in 1818; and a temporary post at The Dalles from 1829 to 1830 (Meinig 1968). Most Beaver skins traded at these forts were obtained from the surrounding forested ecoregions.

Fort Nez Perces was situated near the center of the Columbia Plateau, and its district, which was delineated by The Dalles to the west, Priest Rapids to the north, and the Deschutes, John Day, and Grande Ronde watersheds to the south, was considered poor "fur country." Nevertheless, between 1827 and 1831 about 1,150 Beaver skins per year were traded at Fort Nez Perces (Meinig 1968). During that period, the number of Beaver skins traded per year at Fort Nez Perces dropped by 50%. Given the locations of trading posts and the high demand for Beaver skins, if Beaver could be trapped profitably in the Columbia Plateau, then they probably were. North of the Columbia Plateau, Beaver were also heavily exploited, and impacts to Beaver populations are indicated by trends in Beaver skins. The number of Beaver skins traded at the Hudson's Bay Company's Fort Colville (founded in 1825) dropped precipitously from 3600 per year in 1826 to 438 per year in 1850 (Johnson and Chance 1974).

The Hudson's Bay Company's annual Snake Country Expeditions operated out of Fort Walla Walla (formerly Fort Nez Perces). One goal of these expeditions was to create a "fur desert" which was intended to discourage America's westward expansion into lands controlled by Great Britain (Lorne 1993). George Simpson, the Hudson's Bay Company's governor at Fort Walla Walla, wrote in 1824, ". . . we have convincing proof that the country is a rich preserve of Beaver and which for

[9] In 1818 the North West Company opened a fur-trading post near the mouth of the Walla Walla River at the current location of Wallula, Washington. Originally called Fort Nez Perces, it was renamed Fort Walla Walla when the North West Company and the Hudson's Bay Company merged in 1821 (Denfeld 2011).

political reasons we should endeavor to destroy as fast as possible" (Ott 2003). In 1825 the trapper Peter Ogden and his party collected 3,577 Beaver skins in the Crooked River watershed, a semi-arid portion of the neighboring Blue Mountains Ecoregion, and on two subsequent expeditions trapped more Beaver in this area (Buckley 1993). During the 1825 expedition, Odgen noted that the Crooked River's tributaries were well lined with willows and aspen. By 1910, if not sooner, Beaver had been eliminated from some tributaries of the Crooked River, and the willow and aspen had vanished (Buckley 1993). The eradication of Beaver from dryland riparian areas is thought to have caused a cascade of adverse effects upon riparian ecosystems that I discuss in Section 7.3.

7.2.2. Open Range Grazing by Livestock

Open-range grazing by livestock was the next major ecological impact of Europeans in the Columbia Plateau Ecoregion. Around 1730, Native Americans on the Columbia Plateau acquired horses descended from those brought by Spanish explorers (Carlson 1940). In 1805, Lewis and Clark saw about 700 horses in one Indian village and thousands more in the nearby hills (Galbraith and Anderson 1971). Daubenmire (1970) believed that while most villages were on rivers, the impacts to riparian vegetation by horses were probably not extensive. A few cattle were brought to the Okanogan Valley in 1825 and to the Walla Walla Valley in 1834 (Carlson 1940). By 1855, roughly 200,000 cattle inhabited the Columbia Plateau of Washington (Daubenmire 1970). Sheep herding developed in the 1880s (Daubenmire 1970), and great numbers of sheep were brought to eastern Washington in 1892 (Galbraith and Anderson 1971). By the late 1800s, damage to rangeland from overgrazing was evident. Based on his 1893 expedition from Spokane to Steven's Pass, the botanist John Leiberg wrote, "We will never know the complete flora of these regions. Sheep and cattle are rapidly destroying the native plants and by the time private explorations reach these regions the flora will have been totally exterminated by such agencies" (as cited in Mack 1988; Weddell 2001).

Open-range management of livestock invariably results in excessive utilization of riparian areas (Ohmart 1996), and the destructive impacts of unmanaged grazing in riparian areas are well-documented (Kauffman and Krueger 1984; Ohmart 1996, Belsky et al. 1999). Riparian areas in arid and semi-arid lands of the western United States cover only 1 to 2% of land area, but produce 20% of available forage and nearly 80% of forage actually consumed by cattle (Fisher 1995). Therefore, it is reasonable to assume that the damage observed by Leiberg was greatest in riparian areas.

Restoration projects can indicate the density of woody plants that existed historically in riparian areas prior to intensive livestock grazing. For example, two years after the cessation of grazing within riparian areas in northeastern Oregon, the mean crown volume of willows and Thinleaf Alder tripled in size and that of Black Cottonwood increased nine-fold (Case and Kauffman 1997). Furthermore, shrub density increased by 50%. One possible reason for the severe impacts of grazing in the Columbia Plateau is that, unlike the Great Plains, Bison (*Bison bison*) have been rare or absent from the Columbia Plateau for close to 10,000 years (Jones 2000). According to Daubenmire (1970) and also Mack and Thompson (1982), ungulates played no significant role in the evolution of plant species in steppe and shrub-steppe communities of the Columbia Plateau, and consequently present-day vegetation cannot endure intensive grazing by livestock.

The impacts of both Beaver trapping and open-range livestock grazing may have acted synergistically to degrade riparian areas. Baker et al. (2005) suggest that Beaver and willow (*Salix* spp.) are mutualists because willow is an important food source for Beaver, and Beaver create environmental conditions suitable

as willow habitat. Baker et al. (2005) believed this relationship can persist indefinitely within a given area. They also speculated that heavy browsing by native ungulates or livestock disrupt the Beaver-willow mutualism, thus leading to degradation of the riparian ecosystem. Ohmart (1996), based on personal observation, suggested that overgrazing by livestock causes an imbalance in the Beaver-vegetation relationship that leads to collapse of riparian forests. A similar relationship has also been observed in Yellowstone National Park (Beschta and Ripple 2016) where decades of intensive grazing by Elk *Cervus canadensis* during the absence of Wolves *Canis lupus* resulted in riparian plant communities that could no longer support Beaver. The reintroduction of Wolves has led to a recovery of Beaver in Yellowstone (Beschta and Ripple 2016).

Today in the Columbia Plateau Ecoregion, the most severe impacts from grazing are caused by wild or feral horses (hereafter collectively known as wild horses). Until the mid-1900s, wild horses inhabited open rangelands in various parts of the Columbia Plateau. Today wild horses are confined to Native American reservations where the number of wild horses has fluctuated greatly over the past 140 years. The reservation of the Yakama Nation, for instance, supported roughly 16,000 horses in 1878, but a round up in 1957 left 300 horses on the reservation (Adams 2004). By 2010, the number of horses had rebounded to 12,000 (YN 2010), but the current carrying capacity of the Yakama Nation's reservation is only about 1,000 horses (Mapes 2010). Consequently, wild horses have destroyed rangelands, cultural resources, and wildlife habitats, including riparian areas (NTHC, no date). Wild horse populations also exceeded the carrying capacities of the Colville and Umatilla reservations (AP 2012; Tribal Tribune 2013). Effective management of wild horses on Native American reservations has been hampered by continual controversy regarding the most practical and ethical means of reducing their population sizes.

7.2.3. Wood Harvest and Wheat

The Donation Land Claim Act of 1850 and Homestead Act in 1862 were major impetuses for settlement of Oregon and Washington states. Settlers needed wood for fuel and construction. On the Columbia Plateau the closest source of wood, and in some places the only practical source, was riparian areas. Historians have little information on wood harvest in riparian areas by early settlers on the Columbia Plateau, however, the practices of pioneers and settlers on the Great Plains, as described by West and Ruark (2004), are likely to be similar to their practices on the Columbia Plateau. West and Ruark (2004) state that pioneers on their way west stripped virtually all trees from the Platte River valley, that riparian areas on the Great Plains were an important source of winter fuel for settlers, and that by 1900 most of the trees in riparian areas of the Great Plains had been harvested. Daubenmire (1970) speculated that Black Cottonwood, the largest tree species in the Columbia Plateau, was much more abundant before the arrival of settlers.

Impacts of Beaver trapping and open-range livestock grazing may have acted synergistically to degrade riparian areas. Baker et al. (2005) suggest that Beaver and willow are mutualists because willow is an important food source for Beaver, and Beaver create environmental conditions suitable as willow habitat.

River commerce on the Columbia and Snake rivers may have also impacted riparian areas. By 1859, steamboats were travelling upriver as far as Wallula, Washington and could reach Lewiston, Idaho at high water (Meinig 1968, cited in Evans 1989). HIstorians do not know how much wood was burned to power steamboats in the Columbia Basin, but estimates from other western watersheds suggest severe impacts to riparian forests along the Columbia and Snake. On the upper Missouri River in Montana, for instance, riparian forests along its banks were denuded of usable trees by the turn of the century (Evans 1989).

The soils and climate of the Palouse Hills subregion are suitable for dryland wheat agriculture. Consequently, the next major impact to riparian areas was converting native vegetation to wheat. The first wheat was planted in 1877, by 1895 most of the tillable land in the subregion had been plowed (Kaiser 1961), and during the 1970s industrial agriculture expedited the destruction of the last refugia for native plant communities (Black et al. 1998). Agriculture in the Palouse Hills had four major impacts on riparian areas, which were all poorly documented: 1) fields were plowed to the very edge of streambanks, thereby destroying riparian vegetation, 2) many ephemeral channels were plowed through and filled (Kaiser 1961; Bryce and Omernik 1997), 3) perennial and intermittent stream channels became deeply incised (Rockie 1939), and 4) some channels were filled with sediment from soil erosion (Rockie 1939; Bryce and Omernik 1997). Rockie (1939) reported a Nez Percé Indian telling him that some dry channels in the Palouse Hills were once perennial streams containing trout. According to Bryce and Omernik (1997), the original channel substrate, riparian vegetation, and flow regime (i.e., perennial or intermittent) are impossible to know in areas of intensive agriculture.



The least arid subregions of the Columbia Plateau support productive grasslands/Alan Bauer

7.2.4. Large-scale Irrigation Projects

Across the Columbia Plateau, the most obvious human impacts to native habitat types, including riparian areas, are those associated with irrigation projects. The U.S. Bureau of Reclamation manages two major projects on the Columbia Plateau, the Yakima and Columbia Basin, which service about 1,135,000 acres (459,318 ha) of farmland (USBR 2017a; 2017b). Another 37,000 acres (14,973 ha) are irrigated with water impounded by dams on the Snake River (USACE 2002). All 1.17 million acres (473,482 ha) of irrigated farmland were once shrub-steppe or steppe vegetation. However, these projects did not record how many acres of riparian area have been lost because ephemeral or intermittent stream channels were filled for agriculture or converted to irrigation ditches.

Construction of the Yakima Project began in 1906, and the last of 11 dams on the Yakima River or its tributaries was completed in 1939 (USBR 2017a). The Yakima Project's biggest impacts to riparian areas are along the Naches and Yakima rivers. Storage reservoirs and water diversions located upstream have truncated the rivers' natural hydrographs. This has substantially reduced river-floodplain interactions, such as inundation and lateral channel migration, which in turn have led to channel simplification and degraded aquatic and riparian habitats (Snyder and Stanford 2001; YSPB 2004).

Construction of the Columbia Basin Project began in 1933 with Grand Coulee Dam, and the first irrigation water was delivered in 1952 (USBR 2017b). The Columbia Basin Project includes a network of canals, drains, and wasteways over 5,800 miles (9,334 km) long. The reservoir behind Grand Coulee Dam, Lake Roosevelt, inundated roughly 84 miles (135 km) of riparian habitat within the Columbia Plateau Ecoregion along the Columbia, Spokane, and Sanpoil rivers.[10] Roughly 460 miles (740 km) of the Columbia River lie within the Columbia Plateau Ecoregion, but only 51 miles (82 km) of riparian habitat, the Hanford Reach, have not been inundated by reservoirs. When the dams were built, there was apparently some hope that vegetation would re-establish along new reservoir margins, but water level fluctuations appear to be too extreme for most plants to tolerate (Evans 1989). The other major impacts to riparian areas from the Columbia Basin Project are dramatic changes in hydrology. The groundwater table around lower Crab Creek, for instance, has risen between 50 and 150 ft (15 and 46 m) since 1952. Furthermore, the formerly intermittent lower Crab Creek is now perennial with four to five times the flow that occurred prior to irrigation (KWA 2004), and, as a consequence, willow species, which are adapted to the natural hydrologic regime, no longer regenerate along lower Crab Creek (Ortolano and Cushing 2000). In contrast, due to groundwater withdrawals, the groundwater table around upper Crab Creek (the Odessa subarea) has fallen 150 ft (46 m) (KWA 2004). I found no records on how the water table changes may have affected stream flow in upper Crab Creek.

Decades of hydrological alteration by dams and water diversions have altered vegetation composition and structure of riparian areas. Black Cottonwood and willow are successional pioneers that require barren sediments of disturbed alluvial floodplains for seedling germination (Patten 1998). Such conditions are produced by floods, but dams reduce peak flows and the erosive forces that scour sediments. Furthermore, the survival and growth of Black Cottonwood seedlings is highly dependent on water table elevation and its seasonal rate of change (Braatne et al. 1996). If the water table declines more rapidly than seedling root growth, then seedlings die. Braatne et al. (2007), for example, found that dams on the Yakima River created

[10] Estimated with Google Earth. Distance estimated along Spokane River comports with that reported by Ortolano and Cushing (2000).

hydrological conditions unsuitable for Black Cottonwood seedlings. They studied river reaches near Cle Elum, Union Gap, and Wapato and found: 1) no seedlings in any reaches, 2) Black Cottonwood stands less than 25 years old were extremely limited, 3) riparian areas were dominated by older age classes, and 4) altered hydrology promoted invasion of the floodplain by exotic tree species such as Silver Maple *Acer saccharinum*, Norway Maple *Acer platanoides*, and Chinese Elm *Ulmus parvifolia*. Hence, one could confidently infer that historical conditions have been altered by regulated flows. If artificial flow regimes are not changed, then as older individuals senesce and die, cottonwoods may be eliminated from some sections of the Yakima River. This would have adverse effects on multiple riparian area functions: streambank stability, shading, large wood recruitment, and detrital nutrients. Exotic tree species currently found along the Yakima River cannot provide the same ecological functions as Black Cottonwood because they cannot establish themselves in the barren, saturated sediments of recently disturbed floodplains.

Dams have also altered the flow of wood through watersheds. Historically, wood was transported from forested headwaters to dryland reaches of rivers and streams. This process is known to have occurred in other semi-arid and arid regions of the United States.

"We will never know the complete flora of these regions. Sheep and cattle are rapidly destroying the native plants and by the time private explorations reach these regions the flora will have been totally exterminated by such agencies."

- Botanist John Leiberg, 1893

Minckley and Rinne (1985) present historical evidence for the movement of large wood in desert rivers of the American southwest: wood originated in forested headwaters, moved sporadically through desert riparian areas during flood events, and was ultimately deposited at the mouth of the Colorado River in Mexico. Minckley and Rinne (1985) identified interception of large wood by dams as a major cause of large wood reduction in semi-arid and arid river basins. At artificial reservoirs in eastern Washington, such as Keechelus, Kachess, Cle Elum, Easton, Bumping, Clear, and Rimrock lakes, large wood that could potentially interfere with dam operations is removed and burned (W. Meyer, Washington Department of Fish and Wildlife, personal communication; B. Renfrow, Washington Department of Fish and Wildlife, personal communication). Large wood in dryland sections of the Wenatchee and Okanogan rivers may be effected in this way as well. How wood management at dams and smaller water diversions affects in-stream large wood in eastern Washington has not been investigated.

7.2.5. Invasive Non-native Plants

An ongoing historical anthropogenic impact is the introduction of exotic invasive plant species. After their botanical survey of the Columbia Plateau in 1893, Sandberg and Leiberg were not troubled by the meager abundance of exotic species at that time (Mack 1988), however, by 1929 about 200 exotic species were known to exist on the plateau (Mack 1988). Riparian areas in dryland landscapes are more vulnerable to invasion by exotic plant species than adjacent upland areas (Loope et al. 1988; Hood and Naiman 2000), and invasive plants in riparian areas can impact a variety of ecological processes: hydrology, sediment dynamics, nutrient dynamics, and species competition. Two invasive species of particular concern are Reed Canary Grass and Russian Olive.[11]

11 Other invasive species of concern in the Columbia Plateau Ecoregion are Crack Willow *Salix fragilis*, Yellow Flag Iris *Iris pseudacorus*, and Purple Loosestrife *Lythrum salicaria*.

Reed Canary Grass occurs as both exotic and indigenous strains (Tu 2006). The European cultivar has been present in the Pacific Northwest since the 1880s (Stannard and Crowder 2001), and, as of 2016, it is found in all Washington counties except Douglas (WSDA 2016). Reed Canary Grass forms dense stands that can exclude all other plant species, and such stands exhibit substantially higher transpiration per unit ground surface area than other species (Gebauer et al. 2015). This could alter water availability in riparian areas. Reed Canary Grass also has higher roughness values than native sedge species (Martinez and McDowell 2016). This could lead to greater sediment deposition and channel narrowing.

As of 2016, Russian Olive is found in most counties east of the Cascade crest and is most common in Grant County (WSDA 2016). In the late 1800s, it was introduced into the Pacific Northwest as an ornamental plant (Giblin 2006), but the species did not become prominent outside cultivated areas until two to five decades later, depending on location. Unlike many tree and shrub species in dryland riparian areas, Russian Olive does not require disturbed soils for germination. Hence, it can grow on sites where woody vegetation would not naturally occur (Katz and Shafroth 2003). It is also shade tolerant, and consequently, Russian Olive can establish beneath the canopy of native riparian trees or shrubs and compete with them for resources. Russian Olive exhibits about two times higher transpiration per unit basal area than cottonwood trees (Hultine and Bush 2011). This could alter water availability in riparian areas. The species is a nitrogen fixer that adds nitrogen to the soil. Tuttle et al. (2016) found that stands of Russian Olive had higher exotic plant ground cover than stands of native tree species, and they believed that the difference was due to higher available soil nitrogen that benefited fast growing exotics plants. Finally, according to Lesica and Miles (1999), Beaver foraging behavior indicates that Russian Olive is much less palatable than native cottonwood. They found that 77% of cottonwood trees along a river in Montana were damaged by Beaver but only 22% of Russian Olive trees were damaged. If Russian Olive replaces native cottonwood, then Beaver population density could be adversely affected.

7.2.6. Value of a Historical Perspective

Current scientific understanding of riparian ecosystems in the Columbia Plateau Ecoregion is mostly based on present-day conditions, which are unlikely to accurately represent historical composition and structure. History indicates that past human impacts in the Columbia Plateau may have erased fully functioning riparian ecosystems from many watersheds. For example, records of the U.S. Army cavalry at Fort Simcoe on the Yakama Indian Reservation from the 1850s describe small valleys with broad floodplains dissected by multi-threaded stream channels that are absent today. These valleys—such as the Wenas, Ahtanum, and Cowiche—historically contained a network of streams, wetlands, and Beaver ponds that supported extensive groves of willow, Redosier Dogwood, Black Cottonwood, and aspen. Cattle were said to be lost for weeks in these tangles (P. Harvester, Washington Department of Fish and Wildlife, personal communication). These same streams are now reduced to a single, incised channel with minimal riparian vegetation. The loss of riparian habitats indicated by the Fort Simcoe records is very likely to have occurred in other parts of the Columbia Plateau.

Rivers and streams of the Columbia Plateau Ecoregion have been degraded by a variety of human activities. This has adversely affected anadromous salmon—their populations are threatened with extinction and fisheries produce a small fraction of historical harvest. In response, salmon habitat restoration projects are occurring throughout the Columbia Plateau. Habitat restoration requires ecological reference information to determine site-level restoration potential, establish desired conditions, and formulate measures of success

(White and Walker 1997). Ecological reference information is generally based on historical conditions, natural areas, or minimally disturbed sites (White and Walker 1997; Stoddard et al. 2006; Higgs et al. 2014). In the Columbia Plateau Ecoregion, which lacks national parks, wilderness, or roadless areas containing natural reference sites, historical information may be the only basis for reference conditions (Wohl 2005).

Because the Columbia Plateau lacks undisturbed watersheds, even small ones, ecologists have a poor understanding of the composition, structure, and functions of natural riparian ecosystems. Historical reconstruction using journals of early explorers and naturalists, General Land Office survey notes, and historical drawings or photos (Figure 7.4) are ways to develop qualitative descriptions of riparian plant

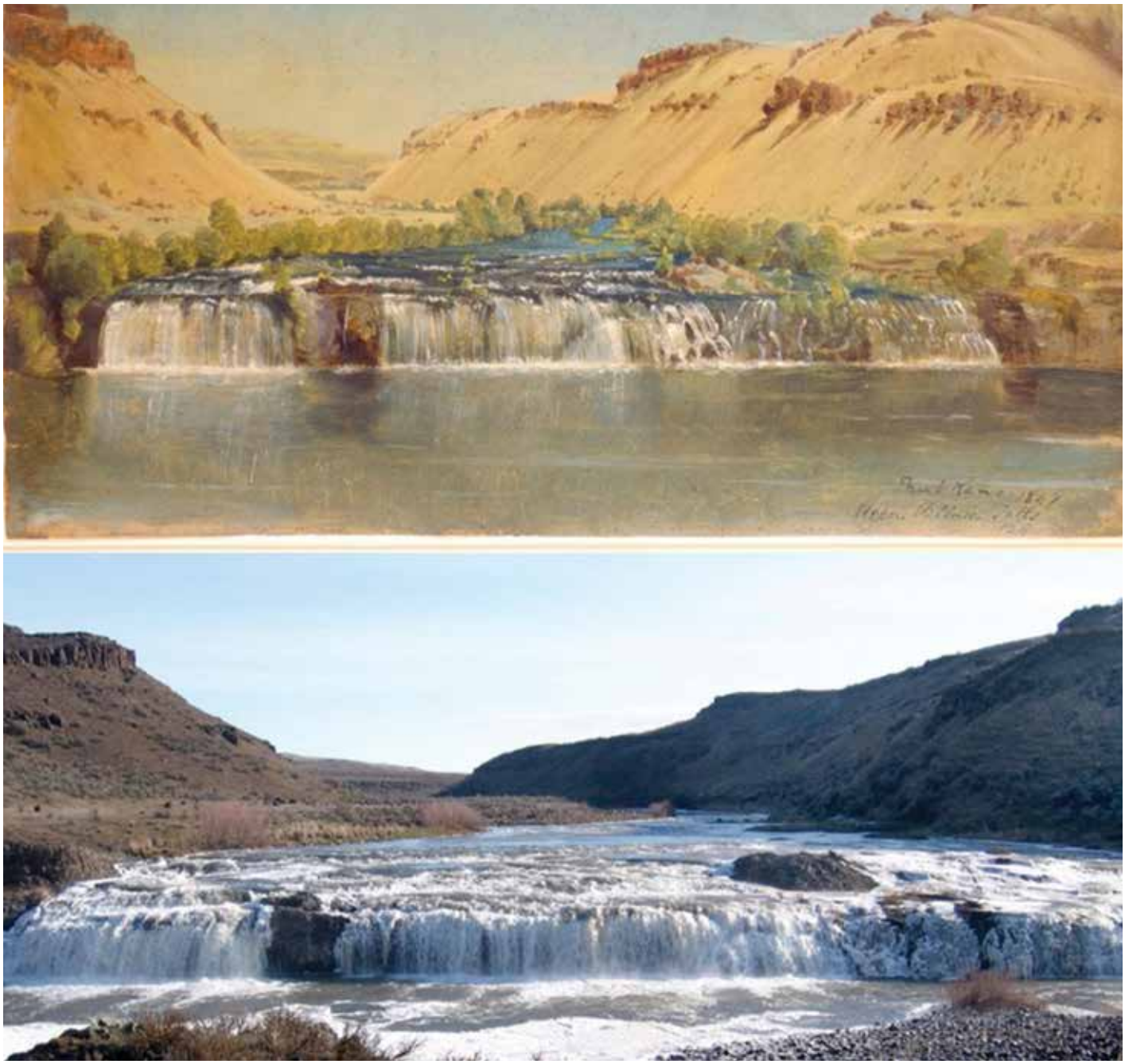


Figure 7.4. Historical drawings and paintings can provide invaluable information for riparian area restoration. A 1847 painting by Paul Kane of Upper Palouse Falls (top) shows extensive, uninterrupted small tree or tall shrub vegetation along the river banks. A recent photo by Jack Nisbet (bottom) although taken in winter, shows large gaps in small tree or tall shrub vegetation along the banks.

communities (McAllister 2008). Much work needs to be done on deducing the likely historical conditions of riparian areas in the Columbia Plateau. Studies of historical conditions in the Columbia Plateau, however, must be cognizant of one important caveat. If hydrology of a riparian area has been significantly altered by human activity, then the vegetation that site supported historically may have no relationship to the vegetation the site is capable of supporting now. Irrigation systems have altered hydrology in riparian areas throughout the Columbia Plateau, making some drier and others wetter. At such places, information on historical vegetation will often be of little value in establishing desired future conditions for restoration.

7.3. Beaver

Beaver may play an essential role in the restoration and future conservation of dryland riparian areas (Dremmer and Beschta 2008; Pollock et al. 2014). The ecosystem benefits of Beaver in dryland riparian areas have been known for over 80 years. Scheffer (1938) reported that in 1936 the Soil Conservation Service transplanted 10 Beaver to the Ahtanum Creek watershed for the purposes of increasing water storage. The Beaver constructed several large dams, one of which was 90 ft (27 m) long, 10 ft (3 m) high, and stored 5 acre-feet (6,167 m^3) of water. Scheffer (1938) implied that the dams reduced downstream flood damage and increased summer stream flows for irrigation. Finley (1937) reported the opposite situation for Silver Creek in eastern Oregon. Two trappers removed 600 Beaver in one winter. As a result, the Beaver ponds "disappeared," the water table lowered, grassy meadows "died out" and streams containing trout went dry.

The observations of Scheffer (1938) and Finley (1937) are anecdotes. More rigorous scientific research into the connections between Beaver and riparian ecosystems have found that Beaver have numerous positive effects.



Beaver viewed with night vision camera/Ned Pittman, WDFW

Beaver dams store organic nutrients and large quantities of sediment, reduce channel incision, remove excess nutrients from water, increase surface water storage and base flows, reduce peak flows, increase groundwater recharge, raise water table elevations, expand the area of riparian vegetation, and increase the salmonid habitat capacity of small streams (Naiman et al. 1988; Pollock et al. 2003; Gibson and Olden 2014). For dryland riparian areas where the extent of riparian vegetation depends on shallow groundwater, the hydrologic and geomorphic effects of Beaver dams may be necessary for the mere existence of a riparian zone at many sites. In dryland riparian areas, most ecosystem functions occur within the riparian zone.

The dramatic effects of Beaver on hydrology was shown by Westbrook et al. (2006), a multi-year study of two Beavers dams on a fourth order stream running through a dry meadow in the Rocky Mountains of Colorado. One dam diverted over half and the other diverted 70% of the stream onto the floodplain and terrace. Both dams increased substantially the area flooded by annual peak flows. One dam caused the equivalent of a 20-year flood over 30 acres (12 ha) of the valley floor during a peak flow event with a 1.6-year recurrence interval, and the other dam caused the equivalent of a 200-year flood over 21 acres (8 ha) of the valley floor during a peak flow event with a 1-year recurrence interval. One of the dams

studied by Westbrook et al. (2006) was breached by high flows. Westbrook et al. (2011) subsequently found that overbank flooding caused by that dam had deposited nutrient-rich sediments in some areas and scoured soils in other areas downstream of the dam site. These bare sediments were colonized by willow and aspen seedlings, which may eventually establish riparian plant communities.

In sagebrush steppe of Wyoming, Cooke and Zach (2008) found that the number of Beaver dams was positively associated with riparian zone width, riparian shrub height and percent cover by emergent wetland vegetation. These responses can at least partly be explained by changes in hydrology caused by Beaver dams.

Eradication of Beaver has been implicated in stream channel incision and desertification of riparian zones that has occurred throughout arid and semi-arid ecoregions of western North American (Parker et al. 1985; Pollock et al. 2003), including the Columbia Plateau (Pollock et al. 2007). According to Pollock et al. (2007), the exact mechanism that caused widespread incision of streambeds remains uncertain, however, incision almost invariably coincided with widespread trapping of Beaver and the onset of intensive livestock grazing. Channel incision, whatever the ultimate cause, occurs through an imbalance between sediment deposition and sediment mobilization. Assuming no changes in upstream sediment sources, incision is usually attributed to an increase in erosive forces or a decrease in channel resistance to erosive forces. The former can be caused by an increase in runoff, both can be caused by a decrease in channel roughness, and the latter can also be caused by loss of streamside vegetation. Therefore, channel incision can be prevented by controlling runoff caused by upstream land uses, maintaining roughness elements such as large wood, and retaining riparian vegetation. For many dryland riparian areas, Beaver are essential for the latter two. Beaver dams act as massive roughness elements that reduce flow velocities, thereby reducing hydraulic forces that cause erosion. Reducing flow velocities also results in sediment deposition, which raises the streambed elevation and creates microsites suitable for germination of riparian plants.

Several studies have suggested that reintroduction of Beaver can reverse channel incision (Pollock et al. 2007; Beechie et al. 2008), primarily by restoring sediment retention processes in the channel (Pollock et al. 2014). Sediment aggradation caused by Beaver dams fills the incision and raises the streambed elevation. As the bed elevation increases, hydrologic connectivity between the channel and former floodplain is improved both by raising the water table elevation and by reducing bank height, which allows overbank flooding to recharge the floodplain's alluvial aquifer. Increased soil moisture allows riparian plant species vegetation to re-establish. Development of a well-vegetated riparian zone provides Beaver with more food and building materials, enabling construction of more dams (Pollock et al. 2014).

The aforementioned impacts of Beaver on aquatic and riparian ecosystems are immensely beneficial to fish; however, Beaver may also have detrimental effects on fish. Sediment deposition in Beaver ponds may harm spawning beds, and Beaver dams can block upstream and downstream fish movements (Pollock et al. 2003). Water temperature in Beaver ponds can be warmer than nearby flowing waters, especially where the stream is largely under a closed canopy forest (Robison et al. 1999), but in areas with open or no canopy (such as dryland riparian areas), water temperatures tend to be similar between Beaver ponds and unimpounded reaches (Talabere 2002). Beaver ponds have also been found to provide productive habitats for non-native fish (Gibson et al. 2015) that may compete with or prey upon native fish.

7.4. Ecosystem Functions

FEMAT (1993) identified five key functions of riparian ecosystems that are important for fish habitats: streambank integrity affected by plant roots, litter fall that provides detrital nutrients, shading to limit stream temperatures, large wood recruitment, and pollution removal. Most of what is known about these key riparian functions was discovered through research conducted in forested ecoregions, in particular, the mesic forest ecoregions of the Pacific Northwest (e.g., Salo and Cundy 1987; Naiman and Bilby 1998; Richardson et al. 2005). Much of what is known about riparian areas in forested ecoregions is transferable to riparian areas in the Columbia Plateau, and therefore, where appropriate I repeat some of the knowledge and principles elucidated in chapters 1 through 6. However, as will become apparent, large gaps in knowledge remain.

In addition to FEMAT's key ecological functions, a sixth key function occurs in dryland riparian areas– alluvial water storage. Alluvial water storage occurs in riparian areas of all ecoregions, but it may be especially important in dryland ecoregions.

7.4.1. Streambank Stability

Streambank stability refers to a bank's resistance to change and its resilience after change (Bohn 1986). Streambank stability is the opposite of streambank erosion. Streambank erosion is commonly misinterpreted as a sign of adverse human impacts to riparian ecosystems, and it can be. However, a channel in dynamic equilibrium simultaneously exhibits both stable and unstable banks (Wohl et al. 2015). Streambank erosion is integral to a watershed's fluvial disturbance regime and necessary for long-term ecological sustainability (Florsheim et al. 2008) because the opposing processes of bank stability and bank erosion maintain the diversity of aquatic and riparian habitats within a watershed. Bank stability is also associated with overhanging/undercut banks which shade the water and provide cover for fish (Bohn 1986; Ohmart 1996).

The stability of streambanks is influenced by soil characteristics, groundwater, and vegetation. For the purposes of riparian area management, I focus on vegetation. Rooted vegetation is essential for streambank stability (Hupp and Osterkamp 1996; Gurnell 2014). Plants are said to provide "root strength" or "root reinforcement" along streambanks (FEMAT 1993; Pollen-Bankhead and Simon 2010). Soil is generally strong in compression, but weak in tension. Woody and herbaceous plant roots are strong in tension, but weak in compression. Consequently, the root-permeated soil of streambanks behaves as a composite material with enhanced strength (Simon and Collision 2002). Dense root networks also physically restrain or bind soil particles. Exposed roots on the bank surface increase channel roughness which dampens stream flow velocities, thereby reducing fluvial erosion (Griffin et al. 2005). Reduction of stream velocities by roots may also cause sediment deposition, which further stabilizes streambanks.

The stability provided by roots is species dependent (Polvi et al. 2014). Simon et al. (2006), for instance, found that Lemmon's Willow *Salix lemmonii* provided 10 times more root reinforcement of streambanks than Lodgepole Pine *Pinus contorta.* The difference was due to the greater root density and larger root area of Lemmon's Willow. On the southeastern slope of the Cascades Range in Washington, Liquori and Jackson (2001) found that different riparian plant communities manifested differences in bank erosion and channel form. They identified two types of riparian plant communities: a scrub-shrub community that exists within an open-canopy Ponderosa Pine *Pinus ponderosa* forest, and a dense, closed-canopy fir forest. The

Ponderosa Pine forest is maintained by regular wildfires while the fir forest was created by fire suppression. The scrub-shrub community was associated with stream channels that had less bank erosion, lower width-to-depth ratios, more pools, and more undercut banks than channels within the fir forest community. The channel morphology of scrub-shrub riparian communities also resulted in slightly lower summer stream temperatures. In the semi-arid Sierra Nevada Mountains, Micheli and Kirchner (2002) found that riparian areas comprised of sedges and/or rushes had banks five times stronger than riparian areas comprised of sagebrush and grasses, and that bank strength was correlated with the root mass to soil mass ratio. Sedges and/or rushes enabled the formation of undercut banks, and increased the width of an undercut bank by a factor of 10.

The composition and structure of riparian vegetation affects channel morphology which, in turn, affects riparian vegetation (Corenblit et al. 2007; Osterkamp and Hupp 2010). Toledo and Kauffman (2001) observed the effects of one such interactive feedback loop in semi-arid northeastern Oregon. Upland plants were found along incised channels and wetland-obligate plants (mostly sedges) were found along unincised channels, which had two times greater root biomass than incised channels. Along unincised channels, approximately 40% of root biomass was deeper than 8 in (20 cm) in the soil, but along incised channels less than 25% of root biomass was below 8 in (20 cm).

Compared to forested ecoregions, there is less large woody debris, and woody debris play a much smaller role in the fluvial processes of dryland river and streams.

Denser roots at deeper soil depths result in a larger volume of reinforced soil. According to Toledo and Kauffman (2001), the severely degraded conditions at their incised sites were caused by a positive feedback loop in which an initial channel incision led to a lower water table. The resulting reduction in soil moisture altered riparian vegetation which shifted to an upland plant community with reduced root mass. Bank erosion subsequently increased which led to channel widening and further incision.

The studies reviewed thus far have reported on the bank strength provided by hydric or wetland-obligate shrubs and herbaceous plants (sedges and rushes) in dryland riparian areas. Trees are also important for bank stability. Rood et al. (2015) studied the amount of bank erosion after major floods along Elk River in British Columbia. They found that floodplain locations occupied by grassland or small shrubs exhibited substantial erosion (>75 m of bank erosion) after major floods but locations occupied by forest, including Black Cottonwood stands, exhibited much less change (<15 m of bank erosion). Rood et al. (2015) concluded that "only big plants can resist big flows," and that other studies which demonstrated that grasses or shrubs are more erosion resistant had observed only low energy flows in smaller or shallower gradient streams.

Streambanks along incised channels of arid or semi-arid regions are particularly sensitive to changes in soil moisture. Much of the bank may be above the water table, and hence soils are unsaturated. Matric[12] suction above the water table, enhanced by transpiration of riparian vegetation, has the effect of increasing the apparent soil cohesion, and decreases in soil strength due to a loss of suction are a leading cause of bank failures in incised channels (Simon and Collison 2002).

12 Matric suction is a negative pore pressure that induces water to flow in unsaturated soil. It results from the combined effects of adsorption and capillarity of the soil matrix. Water flows from a soil with low matric suction (a wet soil) to soil with a high matric suction (a dry soil).

7.4.2. Wood

The main role of wood in aquatic ecosystems is roughness element (Bisson et al. 1987). Roughness elements are obstacles in a channel that deflect flow and change its velocity. The size, shape, and strength of large wood make it very effective at redirecting hydraulic forces and the flow of materials, such as sediment and fine organic matter. In-stream large wood increases hydraulic complexity, i.e., creates a wider range of flow velocities, which causes pool formation, streambed scour, sediment deposition, and channel migration. The net result is a diversity of aquatic habitat types.

I could find no studies conducted in the Columbia Plateau describing the density of trees or their spatial distribution in riparian areas. However, riparian areas in the Columbia Plateau certainly contain less large wood than forested ecoregions, even historically, for three reasons. First, trees are smaller in the Columbia Plateau than in forested ecoregions of Washington. Canopy dominant trees in old-growth riparian ecosystems of mesic forested ecoregions can be well over 48 in (122 cm) diameter at breast height (dbh) and over 150 ft (46 m) tall, but the maximum size of Black Cottonwood in the Columbia Plateau is much smaller (see below). Second, trees are fewer in the Columbia Plateau because in the Columbia Plateau trees inhabit the riparian zone but often do not inhabit the zone of influence. In forested ecoregions, trees inhabit both zones. Third, along some streams, particularly in the most arid subregions of the Columbia Plateau, even the riparian zone is unsuitable for tree species. At such sites, the riparian zone consists of tall shrub, shrub, grass-like, grass, and forb vegetation types. Therefore, compared to forested ecoregions, there is less large woody debris, and woody debris plays a much smaller role in the fluvial processes of dryland river and streams.

Knowledge regarding wood in aquatic and riparian ecosystems of Columbia Plateau is extremely limited at present, nevertheless, the historical abundance of woody plants in riparian areas is thought to have been much greater than it is today (Wissmar et al. 1994; Kauffman et al. 1997; Wissmar 2004). Riparian areas in the Columbia Plateau are inhabited by a variety of woody plants–Black Cottonwood, Quaking Aspen, White Alder, Thinleaf Alder, Water Birch, Black Hawthorn, and Yellow Willow (Crawford 2003). Conifer trees, including Ponderosa Pine and Douglas-fir *Pseudotsuga menziesii,* are widely scattered in eastern Washington riparian areas and were likely more common historically than at present. They are currently restricted to canyons or valleys with steep rocky walls along mid- to high-gradient streams where they are inaccessible to harvest and where microclimates are conducive to supporting trees (Evans 1989). The main causes of reduced wood are explained in Section 7.2.

The size and quantity of wood recruited to a stream depends on the size and density of woody plants, their distances from the channel, and the recruitment processes that deliver wood to the channel. Only a few tree species in riparian areas of the Columbia Plateau qualify as large wood, which is commonly defined as greater than 4 in (10 cm) in diameter and greater than 6 ft (2 m) in length.[13] Black Cottonwood is the largest riparian tree species in the Columbia Plateau Ecoregion and the largest deciduous species in western North America. The species has a typical lifespan of 100 to 200 years (Braatne et al. 1996), and can attain a dbh of about 30 to 35 in (76 to 90 cm) in the Pacific Northwest (Franklin and Dyness 1988), but sizes are smaller in the Columbia Plateau. The interior of British Columbia is less productive than the province's coastal ecoregion, and in the interior, Black Cottonwood attain an average size of 15 in (38 cm) dbh and 52 ft (16 m) tall at age 80 years, and 26 in (66 cm) dbh and 70 ft (21 m) tall at age 150 years (Roe 1958). Other tree species that might also

[13] Large wood is also known as large woody debris (LWD) or coarse woody debris. There is no universal definition of LWD. Another common definition is greater than 4 in (10 cm) in diameter and greater than 3 ft (1 m) in length. Small wood is also known as small woody debris or fine woody debris.



Large trees in riparian areas are a major source of instream large woody debris/Jim Cummins , WDFW

function as large wood are Quaking Aspen, White Alder, and Peachleaf Willow *Salix amygdaloides*. Daubenmire (1970) reported that Quaking Aspen and White Alder grow to about 8 and 23 in (10 and 58 cm) dbh, respectively, in riparian areas of the Columbia Plateau.

Substantial amounts of small wood may be recruited to and stored in stream channels through Beaver activity. Most dryland riparian areas lack large trees, but in dryland riparian areas Beaver create large roughness elements from small wood that mimic some effects of large wood (see section 7.3). In effect, Beaver convert small wood to large wood. Beaver dams consist mainly of mud and small wood. Published information on small wood sizes in dams of North American Beaver is lacking. However, Beaver most often forage on trees ranging from 1.2 to 3.2 in (3 to 8 cm) in diameter (Collen and Gibson 2001), and a large proportion of woody stems used as food are also used in dam construction (Barnes and Mallik 1996). In Maryland, Blersch and Kangas (2014) found that 98% of sticks (i.e., small wood) in a Beaver dam were less than 4 in (10 cm) in diameter and that 46% of those sticks were probably placed in the dam by Beaver. The other 54% of sticks in the dam were due to passive capture of transported wood.

Large wood recruitment processes in riparian areas of the Columbia Plateau should be very similar to those in forested ecoregions. Therefore, the main processes should be tree mortality caused by disease or senescence, bank erosion, and wind throw. Maximum recruitment distances for large wood will generally be either riparian zone width or site-potential tree height, whichever is smaller. I found no studies on recruitment mechanisms of small wood, nevertheless, the main mechanisms should be direct fall of branches into a stream channel, mobilization by overbank flooding, and Beavers. Consequently, depending on the relative distribution of small and large wood sources within a riparian area, the recruitment distance for small wood could be greater than the distance for large wood. That is, shrubs that lie farther from the stream channel than trees, could contribute small wood via flooding or Beaver.

7.4.3. Detrital Nutrients

With respect to riparian ecosystems, *detrital nutrients* most often refer to nutrients derived from terrestrial litter. Litter may consist of leaves, bark, seeds, cones, flowers, fruit, nuts, twigs, and other small plant parts (Benfield 1997). Terrestrial litter in an aquatic system is also called allochthonous nutrients.[14] Detrital nutrients are only one component of nutrient dynamics in riparian ecosystems. Riparian areas also mediate bi-directional exchange of dissolved nutrients between terrestrial and aquatic systems. Detrital nutrients in the larger context of nutrient dynamics (e.g., nitrogen cycle) are discussed in Chapter 6.

Besides research on marine derived nutrients (Naiman et al. 2002), the dynamics of macronutrients—nitrogen, phosphorus, and carbon (N, P, and C)—in riparian areas of the Pacific Northwest has been largely neglected by scientists (but see Naiman and Sedell 1980; Triska et al. 1984). I found one study related to nutrient dynamics in riparian areas that was conducted in the Columbia Plateau Ecoregion (e.g., Cushing and Wolf 1982; Cushing and Wolf 1984; Cushing 1988).

The availability of macronutrients has profound effects on the productivity, composition, and structure of ecosystems. In Washington, many streams and rivers in undisturbed watersheds are oligotrophic, i.e., exhibit low productivity associated with low N or P concentrations. Thut and Haydu reported in 1971 that roughly half of unpolluted surface waters in Washington were N-limited, and the other half were limited by P. Interestingly, N-limited waters, such as those in the Yakima River and lower Columbia River basins, most often arise from volcanic rock formations, while P-limited waters, such as those in the Okanogan River basin, flow from glacial deposits or granitic formations (Thut and Haydu 1971; Murphy 1998). Nutrient-limited waters are often sensitive to anthropogenic inputs of macronutrients, and when more N or P enters a stream than can be immediately metabolized, degradation of aquatic habitats often results. Artificial fertilizers, which are inorganic nutrients, cannot mimic the foodweb role of detrital nutrients. Artificial fertilizers are used by plants, but litter feeds heterotrophs such as macroinvertebrate detritivores (shredders and collectors), many of which are prey for salmonids. Therefore, providing adequate amounts of litter to streams is an important issue for riparian area management.

According to Xiong and Nilsson (1997), in drier and less productive grasslands, a certain amount of litter may help to conserve soil moisture and thus increase plant growth. The same effect may be obtained in dryland riparian areas. Hence, in addition to providing nutrients, litter from riparian vegetation may also retain soil moisture.

Little is known about nutrient dynamics in dryland riparian areas. Nitrogen cycling, for instance, is driven by microbes in soils, and microbial activity depends on water availability. In forested ecoregions, nitrogen cycling is rarely limited by water availability. Hence, microbial processes are active in both uplands and riparian soils, and can occur year round. In arid regions, nitrogen cycling in uplands may cease when soil moisture approaches zero. This is also true of nitrogen cycling in riparian areas, however, nitrogen dynamics are more complex in riparian areas because they are closely linked to seasonal water table elevations which are affected by site and watershed-scale hydrology (Belnap et al. 2005).

Particulate and dissolved organic carbon are important sources of energy in aquatic ecosystems. Both support organisms near the bottom of the food web. In forested ecoregions, productivity of headwater streams is typically light-limited by a closed canopy (Conners and Naiman 1984; Murphy 1998), and consequently, the main source of energy is allochthonous chemical energy

[14] Allochthonous means originating or formed in a place other than where found. In contrast, autochthonous means originating or formed in the place where found.

from riparian areas. In arid and semi-arid regions, the canopy over headwater streams tends to be more open, which allows more light to reach the aquatic ecosystem. Cushing and Wolf (1982) found that chemical energy for a small spring-fed stream in central Washington, Rattlesnake Springs, was predominantly autochthonous, i.e., produced within the stream by Watercress *Rorippa nasturtium-aquatica,*[15] Cattail *Typha latifolia*, and algae. Direct allochthonous inputs contributed 11% of total energy inputs, and all of it was consumed. Consequently, Cushing and Wolf (1982) concluded that the aquatic community exhibited both autotrophic and heterotrophic traits.

The amount of allochthonous carbon produced by dryland riparian areas varies considerably. The input rates of allochthonous organic matter (specifically, leaf litter from shrubs) in two dryland riparian areas were 1.1 oz/ft^2/yr (350 g/m^2/yr) at Rattlesnake Springs and 0.54 oz/ft^2/yr (165 g/m^2/yr) at Snively Springs (Fisher 1995). The former is about 1.2 to 2.1 times greater than the amount of leaf litter produced by riparian areas in mesic forests (Gregory et al. 1991; cited in Fisher 1995).

Nearly all N in lotic ecosystems in forested ecoregions of the Pacific Northwest is derived from allochthonous sources. Headwater streams in the western Cascades of Oregon, for instance, obtain more than 90% of annual nitrogen inputs from biotic processes in the adjacent forest (Triska et al. 1984). An important source of N in forests of western Oregon and Washington is N_2-fixing Red Alder *Alnus rubra*, which contributes both litter and dissolved organic N to streams (Compton et al. 2003). Small streams in the Columbia Plateau Ecoregion must also obtain N from allochthonous sources. The overstory of some riparian plant communities in that ecoregion consists of N_2-fixing White Alder *Alnus rhombifolia* or Thinleaf Alder *Alnus incana*. Evidence suggests that Black Cottonwood and willow species contain mutualistic organisms that fix nitrogen (Doty et al. 2009, Wuehlissch 2011). This helps to explain how these species can survive and grow on recently disturbed, barren, floodplain sediments. Litter from these pioneering plants also provides nitrogen for other plant species in subsequent successional stages and deliver allochthonous nitrogen to the aquatic ecosystem.

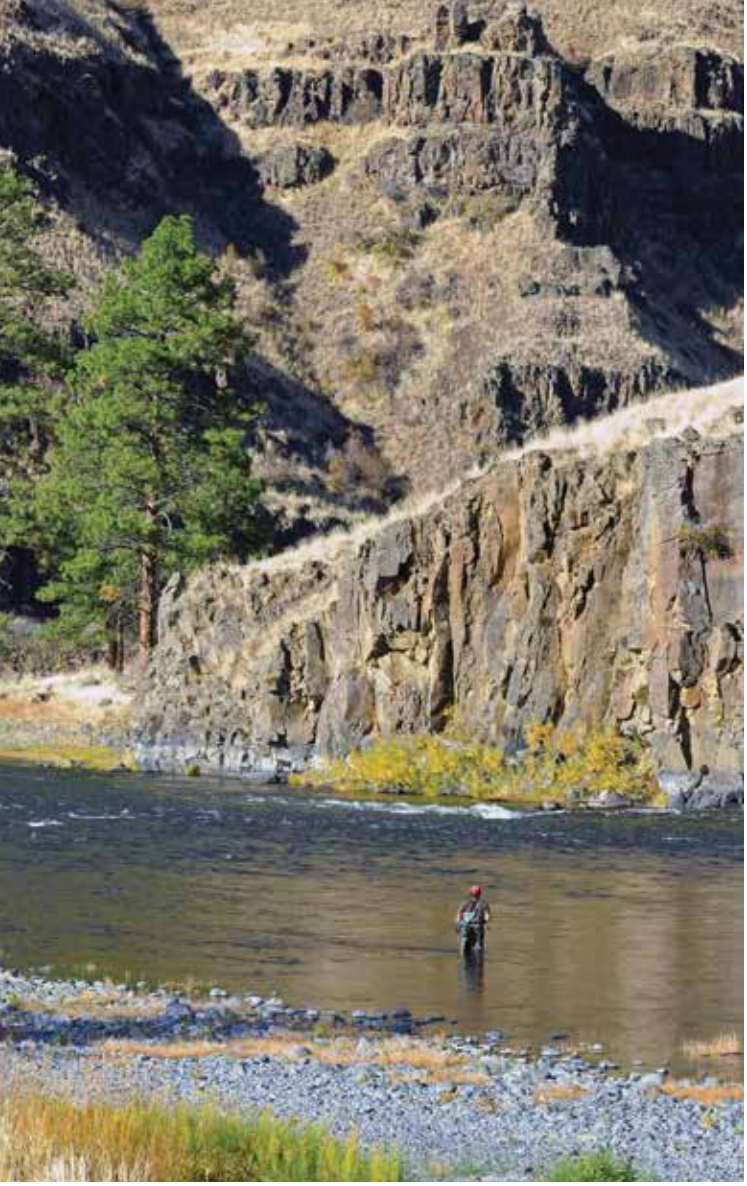
The only study I could find on litter source distances was conducted in mature conifer forest in western Washington. Bilby and Heffner (2016) found that about 95% of litter delivered to streams comes from distances between 39 and 54% of mean tree height, depending upon forest type, topography, and wind. For Snively Springs, a spring-fed small stream with a riparian area comprised of dense willow and wild rose in central Washington, Cushing (1988) found that roughly 40% of litter fell directly into the stream from overhanging vegetation and 60% was blown laterally from plants some distance from the streambank. He did not measure distances. These proportions were affected by factors that influence wind, such as vegetation density and topography.

7.4.4. Shade

For an in-depth discussion of shade and water temperature refer to Chapter 4.

Numerous studies in dryland riparian areas have shown that salmonid species abundance is negatively correlated with stream temperature (Platts and Nelson 1989; Li et al. 1994; Ebersole et al. 2003a; Zoellick 2004). Even when primary and secondary production increase in response to reduced shading, salmonid populations often respond negatively to high temperatures (Tait et al. 1994). Shade is important because it directly affects stream temperatures. Other factors can significantly affect stream temperature, such as topographic shading, channel azimuth, channel form, groundwater flow, and hyporheic exchange, but for the purposes of riparian area management, I focus on shade provided by vegetation. Vegetation also affects local air temperature,

15 Watercress (*Rorippa nasturtium-aquaticum*) is an exotic plant in Washington State.



In the Columbia Plateau, some stream reaches have no shade from vegetation/Alan Bauer

humidity, and air movement, which all affect stream temperature (Cristea and Janisch 2007).

Shading of a stream is affected by the vegetation's height and foliage density and by the stand's depth (or width) and stem density. In general, a taller, denser, or wider strip of vegetation will shade a larger proportion of a channel for a longer time, at both daily and annual time scales. Riparian vegetation also enables the formation of undercut banks, which provide shade along streambanks that has been shown to lower water temperatures of individual pools (Ebersole et al. 2003a; Ebersole et al. 2003b).

The classification system based on overstory underscores the substantial differences in shading provided by riparian vegetation types: tall tree, short tree, tall shrub, shrub, grass-like, grass, and forb (Crawford 2003). The obvious implication of these vegetation types is that some stream channels in the Columbia Plateau receive little or no shade from vegetation, even historically. However, the actual historical condition of many riparian areas is unknown. Studies show that restoration of riparian areas, especially restoration of incised channels, can alter vegetation type, increase shading, and reduce water temperatures. How spatial variation in vegetation type and consequent shading currently affects salmonid habitat regionally is also unknown. Ecologists lack a map of current and potential riparian vegetation types across the Columbia Plateau that would enable managers to assess impacts on fish-bearing streams from insolation (see Macfarlane et al. 2017 for a first approximation).

7.4.5. Pollutant Removal

For an in-depth discussion of pollutant removal by riparian areas refer to Chapter 5.

The capability of riparian areas to remove certain pollutants from runoff is well documented (Barling and Moore 1994; Hickey and Doran 2004; Polyakov et al. 2005; Dosskey et al. 2010). Management of riparian areas for pollutant removal differs from the other ecological functions discussed in this document in that the primary focus is on mitigating activities occurring outside the riparian area. The pollutant removal function is unique in that it only exists in the presence of human activities that generate polluted runoff, and it is only necessary when runoff from upland activities threatens to degrade in-stream water quality. Major nonpoint-source pollutants removed with riparian "buffers"[16] are sediments, excess nutrients (nitrogen or phosphorus), pesticides, and pathogens.

16 Riparian buffers are also known as riparian management zones (RMZs). "Buffer" refers to its purpose, which is to reduce or prevent adverse impacts to water quality, fisheries, and aquatic biodiversity from human activities occurring upslope of the buffer. Riparian buffers managed specifically for pollutant removal may also be called vegetated filter strips.

The processes in riparian areas affecting pollutant transport and fate are complex and often interrelated. Riparian areas can slow surface runoff and increase infiltration of water into the soil, thereby enhancing both deposition of solids and filtration of water-borne pollutants. Riparian areas also intercept and act on contaminants in subsurface flow through dilution, sorption, physical transformation, chemical degradation by various biogeochemical processes, and through uptake and assimilation by plants, fungi, and microbes. Hydrology, soils, and vegetation all affect pollutant transport and fate, but for the purposes of riparian area management I focus on vegetation.

Research on pollutant removal by riparian buffers conducted in arid or semi-arid ecoregions is very limited (Hook 2003). I could locate only three such studies (Tate et al. 2000; Fasching and Bauder 2001; Hook 2003), but all three have significant shortcomings. Hook (2003), for instance, simulated sediment-laden run-off from rangeland in western Montana. He reported that 20 ft (6 m) buffers removed at least 94% of sediment regardless of vegetation type in the buffer, but whether these simulations are realistic is unknown because he did not compare his run-off flow volumes and sediment concentrations to values from actual rangeland. Fasching and Bauder (2001), simulated sediment-laden run-off from tilled, bare cropland in central Montana. They found that 40 ft (12 m) wide buffers removed 75 to 80% of sediment during a simulated 50-year 24-hour storm event. However, while the buffer was 40 ft (12 m) wide, the bare cropland was only 15 ft (3 m) wide, which is certainly an unrealistic size for cropland. Tate et al. (2000) measured nitrate-nitrogen, total phosphorus, and suspended solids in run-off from irrigated pastures in the Central Valley of California. They reported that 33 ft (10 m) wide buffers did not significantly reduce nitrate-nitrogen concentration, total phosphorus concentration, or total suspended solid load. However, the strength of their inferences was compromised by extreme variability. Some buffered plots yielded higher concentrations of all three pollutants than unbuffered plots, which they attributed to differences in soil and microtopography among plots.

Despite the large quantity of research conducted around the world, no widely accepted recommendations have emerged on minimum buffer widths needed to protect water quality. The lack of agreement amongst scientists is due, in part, to the surprising complexity of the biogeochemical processes that remove pollutants from surface and subsurface flows, the many different environmental conditions among research sites, the variety of methods used to study pollutant removal, and the shortcomings of some research (as described above). One way to cut through this variability and develop quantitative relationships between buffer width and pollutant removal efficacy is meta-analysis.[17] I found five such meta-analyses in the literature (Mayer et al. 2007; Liu et al. 2008; Yuan et al. 2009; Zhang et al. 2010; Sweeney and Newbold 2014).

The number of studies in the five meta-analyses ranged from to 52 to 88. I could determine the geographic locations of all studies included in four of the meta-analyses; only one study was conducted in an arid or semi-arid region (i.e., Tate et al. 2000, cited in Zhang et al. 2010). Four meta-analyses analyzed sediment studies, three meta-analyses analyzed nitrogen studies, and 1 one meta-analysis (Zhang et al. 2010) analyzed phosphorus and pesticide studies. All meta-analyses show that: 1) removal efficacy increases as buffer width increases, 2) removal efficacy varies among pollutants, and 3) relationships between buffer width and removal efficacy follow a nonlinear law of diminishing returns. In other words, the marginal removal efficacy decreases as buffer width increases. Comparing the four pollutants, buffer width that resulted in 90% removal was narrowest for sediment and widest for nitrogen (surface and subsurface combined). See Chapter 5 for a complete summary of their results.

17 Meta-analysis refers to various approaches for drawing statistical inferences from many separate but similar experiments (Mann 1990).

Only one study from arid or semi-arid ecoregions was included in the meta-analyses. Therefore, actual removal efficacy versus buffer width relationships may be quite different for riparian buffers in the Columbia Plateau. Differences in soil, hydrology, and vegetation between arid or semi-arid ecoregions and other ecoregions are significant, and are likely to affect pollutant removal. Because soils in arid ecoregions with biological crusts may be less permeable (Warren 2014) and vegetation tends to be less dense, especially in the upland zone of influence, the meta-analyses may underestimate buffer widths needed for a given level of removal efficacy. This issue can only be resolved through research on pollutant removal by dryland riparian areas.

7.4.6. Alluvial Water Storage

Alluvial water storage, also known as bank storage, is an ecological function of riparian areas that is thought to be especially important for small streams in dryland ecoregions (Pollock et al. 2003). However, the idea that alluvium can supply enough water to maintain base flows is controversial because empirical data to support it are lacking (S. Wondzell, U.S. Forest Service, personal communication).

Alluvial water storage is thought to be part of a cyclic process. During annual floods, stream stage exceeds water table elevation, and surface waters flow into shallow alluvial aquifers (Winter et al. 1998). During the dry season, as stream stage declines, water flow reverses from aquifers to surface water, and the released water may comprise a substantial portion of the stream's base flow (Brunke and Gonser 1997; Whiting and Pomerants 1997). By absorbing some floodwaters, alluvial aquifers may also reduce the impacts of flood events (Whiting and Pomerants 1997). The water volume in bank storage depends on the duration of flooding, the area of inundated floodplain, hydraulic gradients between surface water and the aquifer, soil infiltration rate, the permeability and porosity of alluvial sediments, floodplain width, and thickness of the bank storage layer (Whiting and Pomerants 1997; Chen and Chen 2003).



Autumn foliage, brown grass, and low flows annually coincide in Columbia Plateau Ecoregion/Scott Fitkin, WDFW



Alluvial fans, such as these emanating from side canyons, store water from spring snow melt that contributes to a river's base flow during the dry season/Scott Fitkin, WDFW

On the semi-arid plains of Alberta, Meyboom (1961) found that groundwater released from bank storage is a substantial portion of dry-season stream flow in the Elbow River. Bank storage was 73% of total groundwater discharge during normal base-flow recession, and during late summer, discharge from bank storage comprised 50 to 70% of the river's daily mean discharge. On the eastern edge of the Great Plains in central Iowa, Kunkle (1968) determined that base flow characteristics of Four Mile Creek were related mainly to the adjacent alluvial sand reservoir. Bank storage discharge accounted for 37 to 42% of the annual base flow.

Hydrological studies in the Yakima River basin (Synder and Stanford 2001, and studies cited therein) have suggested that prior to irrigation projects extensive exchange between surface and ground waters occurred in riparian areas and floodplains. Annual inundation of floodplains, including riparian areas, would recharge shallow surficial aquifers, including the alluvial aquifer. Synder and Stanford (2001) asserted for the Yakima River, "Based on fundamental hydrologic principles, there is no question that groundwater recharge of this nature would not only have maintained base flows, but would have provided areas of cooler thermal refugia." A salient characteristic of alluvial water

storage is residence time, which can vary from days to years, depending upon floodplain width and hydraulic connectivity of alluvial sediments (Whiting and Pomereants 1997). The historical hydrology of rivers in the Columbia Plateau was water entered alluvial aquifers during spring peak flows and exited the aquifer weeks later during the low flows of late summer and fall of that same year (Synder and Stanford 2001). The historical timing and magnitudes of aquifer recharge and discharge may have been altered by dams, diversions, and levees.

Riparian and floodplain vegetation affect alluvial water storage in four ways. First, vegetation may reduce water storage through evapotranspiration. In fact, removing riparian vegetation can increase annual water yield from a watershed (Salemi et al. 2012). However, the timing of the additional surface water may not coincide with annual low flows when it is most needed. Second, through root growth and decay, vegetation creates soil macropores that increase soil permeability (Fisher and Binkley 2000) and thus enhance infiltration of floodwaters. Third, vegetation increases the residence time of floodwaters in floodplains by increasing surface roughness (Thomas and Nisbet 2007). The increased residence time provides more time for floodwaters to percolate through soils and into the alluvial aquifer. Vegetation increases surface roughness through stems, organic litter, large woody debris, and by altering micro-topography. Fourth, riparian vegetation helps to maintain cooler temperatures of shallow groundwater. Heat conduction from the soil surface into groundwater affects groundwater temperatures. Consequently, shallow groundwater temperatures are cooler in winter and warmer in summer. During the summer, shade from riparian vegetation and the riparian microclimate, which is cooler than adjacent uplands, may result in cooler groundwater. Stanford et al. (2002), for example, collected data suggesting that intact riparian forest moderated the rate of increase in groundwater temperatures along several reaches of the Yakima River.

Alluvial aquifers typically underlie floodplains (Vaccaro 2011), including riparian areas. The alluvial water storage function of floodplains has been degraded by dams that reduce flood magnitudes, levees that reduce the area of flooding, and the channelization or loss of distributary channels across alluvial fans. To replace natural recharge pathways, water managers are trying artificial recharge of shallow alluvial aquifers (USBR & WDOE 2012; WWBWC 2013). While artificial recharge may replace the aquifer recharge function of floods, it cannot replace the fluvial disturbances caused by flooding that are needed to maintain riparian vegetation and aquatic habitats.

7.5. Conclusions

The goal for riparian areas of the Columbia Plateau Ecoregion is the same as the goal for forested ecoregions—maintain or restore key ecological functions. However, management to achieve that goal is more complicated in dryland riparian areas for three reasons. First, there is a greater diversity of plant communities within riparian ecosystems of the Columbia Plateau than in the surrounding forested ecoregions—the vegetation heights of dryland riparian ecosystems range from sedges to tall trees. Several key ecological functions of riparian areas—namely, shade, wood, and detrital nutrients for aquatic habitats—are dependent on vegetation height. The other three functions—bank stability, pollutant removal, and alluvial water storage—are largely dependent on processes occurring at or below the soil surface. In forested ecoregions, the total capacity of a riparian area to provide five of the key functions typically occurs within a site-potential tree height (FEMAT 1993). In other words, with respect to aquatic habitats, full function for five of the key riparian ecological functions is typically provided by an area that is one site-potential tree height wide.[18]

[18] Site-potential" is a concept related to forest productivity. A site's productivity is often expressed as the height a particular tree species growing on that site is expected to attain by a specified age. FEMAT (1993) defined site-potential tree height as the average maximum height of the tallest dominant trees (200 years old or greater).

In dryland ecoregions, the width of the riparian ecosystem is based on the ecological function that creates the widest zone of influence. At most sites, this will be either the wood (large and small) or pollutant removal functions. For grass, herb, shrub, and small tree vegetation types, the zone of influence based on wood, which depends on vegetation height, will be narrower than the zone of influence based on pollutant removal. Therefore, if pollutants, including sediments due to ground disturbance, are a concern at a particular site, then riparian ecosystem width should be based on the desired removal efficacy for pollutants created at that site. If, for instance, surface run-off containing excess nitrogen is a concern and a 95% removal is desired, then the zone of influence is 170 ft (52 m) wide, measured from the active channel, see Table 5.4. If pollutant removal is not a concern, then riparian ecosystem width should be based on site-potential vegetation height (i.e., trees or shrubs), which should provide maximum wood and shade for aquatic habitats.



Some trees (Pinus ponderosa) *have all the luck/Scott Fitkin, WDFW*

The second reason management of riparian ecosystems is more complicated in the Columbia Plateau Ecoregion is water. The existence of dryland riparian areas depends on soil moisture and water table elevations. Many dryland riparian plant communities evolved under an annual hydrological cycle of flooding followed by gradual recession of stream flows. This cycle has been disrupted by dams and water diversions. The consequences of water management on riparian areas were documented by Braatne et al. (2007) who found an unsustainable age-class distribution of cottonwoods along the Yakima River. Two long-term impacts for these reaches of the Yakima could be reductions in shade and large wood for aquatic habitats. Water management is likely to have caused adverse changes to riparian plant communities along other rivers and streams in the Columbia Plateau. Under state law (RCW 90.03), in-stream flows are managed only to maintain flows above a specified minimum flow. Little consideration is given to mimicking the natural seasonal hydrograph for the sake of riparian ecosystems. To restore riparian ecosystems and aquatic habitats in the Columbia Plateau, that may need to change.

Third, management will be more complicated because many riparian areas in the Columbia Plateau have been highly altered by human activities, and ecologists do not know their historical or "properly functioning" conditions. Lacking such information will hamper the success of site-scale riparian restoration projects and regional restoration plans. An initial step toward grappling with this issue might be a subregional or WRIA-level mapping of potential riparian vegetation types. The mapping could include the capacity to support Beaver (e.g., Macfarlane et al. 2017) and the vegetation that would develop in the presence of Beaver. The map would serve three purposes: 1) a vegetation guide for riparian restoration projects, 2) a historical baseline for fish habitat conditions in the Columbia Plateau, and 3) habitat restoration objectives for the recovery of salmon and other aquatic species.

Historical information on riparian areas will serve three other purposes. First, knowledge of historical conditions will enable an accounting of lost ecosystem services. The losses incurred by fisheries are well recognized, but losses of wildlife, both game and nongame species, due to altered riparian areas have not been rigorously evaluated. Another major ecosystem service is the contribution to perennial stream flow from short-term storage of water in shallow alluvial aquifers that lie beneath floodplains (USBR & WDOE 2012; WWBWC 2013). Losses of this ecosystem service caused by disconnecting floodplains from streams also have not been rigorously evaluated. Second, knowledge of historical conditions may enable an estimate of the past quantity and quality of salmon habitats. Historical knowledge of past salmon habitats can be used in salmon recovery plans to establish habitat restoration objectives and priorities. The third purpose is partly political. Knowledge of past habitat loss can influence policy decisions to conserve remaining habitats or to restore habitats where practicable.

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Chapter 8. Watersheds

By: Derek B. Booth

8.1. Introduction

This chapter on watershed-scale processes and management looks beyond the typical site-by-site perspective at which riparian management and stream protection is normally applied. This chapter also considers the interactions between site-specific treatments, whose collective effects may be greater (or less) than anticipated by the individual actions themselves, and it uses these insights to offer a broader approach to riparian management for the protection of aquatic systems. Given this expanded focus, the conditions and influences discussed here may lie outside the framework of normal guidance and regulatory mandates, but they nonetheless affect the health and productivity of riparian areas and their associated aquatic systems. Thus, the conceptual framework provided here should be useful when considering the likely effects of riparian management policies or practices.

The purpose of this chapter is to explore the relationship (and the importance) of watershed-scale management to achieving the goal of abundant, self-sustaining fish and wildlife populations. It assumes that a broader watershed-scale perspective on aquatic ecosystems will ultimately enhance the beneficial effects of management applied at all scales.

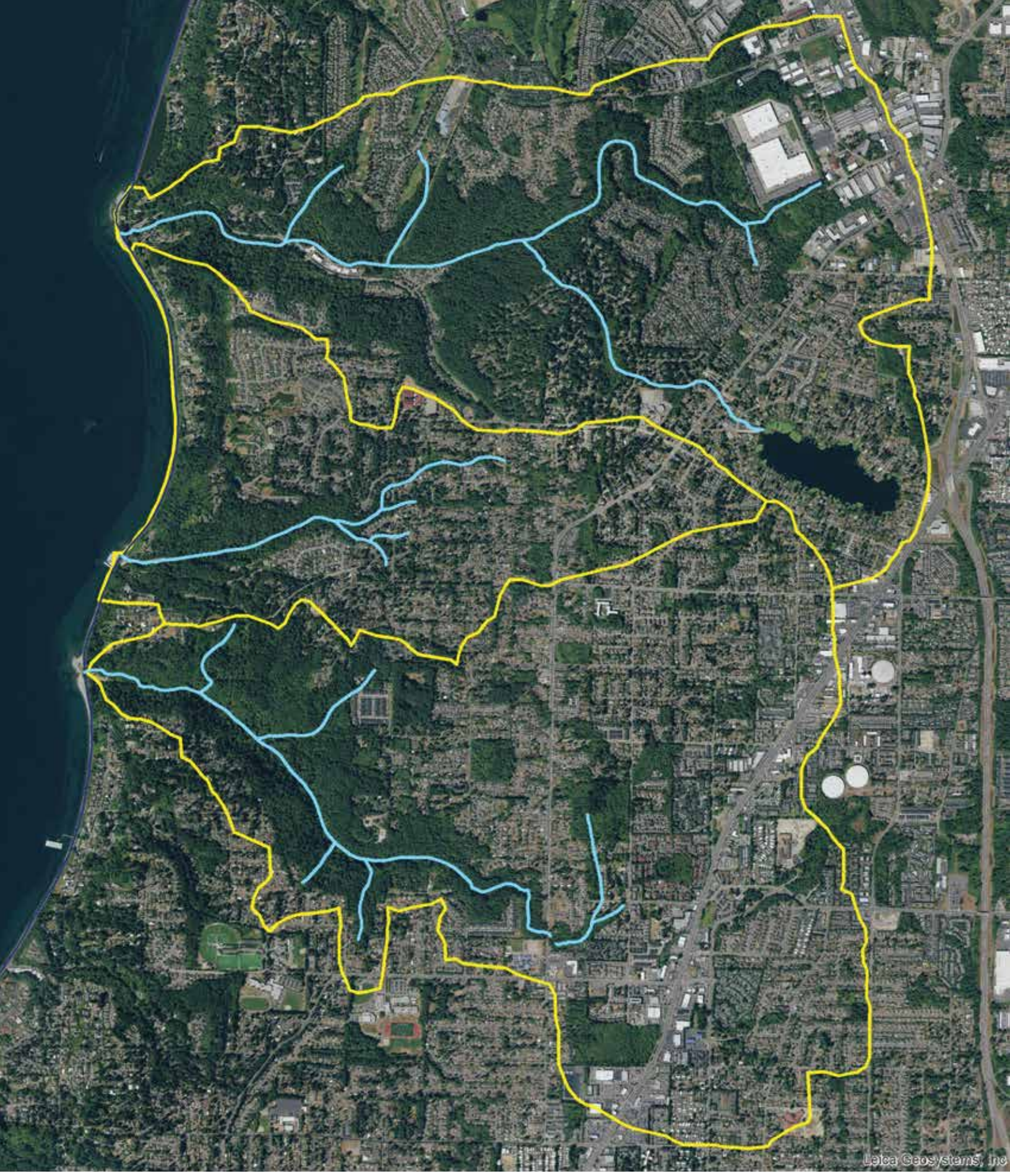
The chapter is divided into four primary sections:

1. A conceptual framework that identifies the key watershed processes and their primary influences on riparian ecosystems and their watercourses, a perspective with a long history in the scientific literature. However, advances in the discipline of landscape ecology over the past two decades—particularly the recognized importance of interrelationships between landscape elements in both spatial (e.g., connectivity and discontinuities) and temporal (e.g., disturbances and recovery) domains—have changed how biological and physical scientists view aquatic ecosystems and the riverine landscape that they occupy.

2. A discussion of how riparian management at the site scale, the emphasis of the other chapters in this document, can best support ecological functions and improve habitat conditions for fish and wildlife, even if a complementary set of watershed-scale management actions (e.g., land use at the watershed scale) cannot be implemented.

3. A description of how individual site-scale management actions, and their recognized site-scale benefits, relate to one another across a channel network and/or landscape. In other words, how do the consequences and overall value/benefit of isolated actions integrate along a channel network? Are the effects of individual actions simply additive, or are there synergistic effects that are revealed by a landscape ecology perspective?

4. Guidance, developed from an understanding of watershed processes and the perspective of landscape ecology, for improving the management of riparian ecosystems. This goal is complicated by the fact that most watersheds are managed under diverse and often uncoordinated responsibility: different landowners and managers have different goals and objectives. Furthermore, many of these managers have neither responsibility nor a process by which to coordinate their



Three watersheds (outlined in yellow) in urban areas of north Seattle/Terry Johnson, WDFW

actions, especially over the long durations necessary for riparian management actions to achieve their greatest effects. This chapter offers no prescription for resolving these challenges, but it proceeds under the belief that greater awareness of these interactions will ultimately lead to more successful protection of riparian systems, streams, and their biota.

8.2. Conceptual Framework

This chapter seeks to integrate the functions of riparian ecosystems into the overall landscape in which they interact–the riverine landscape or *riverscape*. This riverine landscape differs from the contributing watershed of the river or stream: although the flux of water and water-borne biota respect the drainage divides of a watershed almost exactly, other components do not. In particular, mobile organisms (e.g., birds, and large mammals such as American Beaver *Castor canadensis*, and bear (*Ursus* spp.), wind-borne seeds, and wildfire all have the potential to affect and be affected by landscape elements both within and beyond the boundaries of any given watershed, and so they must be included in any comprehensive conceptual framework (Figure 8.1). Despite these watershed-crossing elements, the lotic (flowing-water) environment itself is strongly organized by the unidirectional flow of water, a property that is distinct from terrestrial environments, and so rivers commonly display systematic patterns in the downstream direction (e.g., the "river continuum" of Vannote 1980.) They also display systematic cross-stream patterns, notably the spatial, physical, and ecological relationships between the channel and its adjacent floodplain; and to a less visible but still significant degree in the vertical dimension as well, particularly the interaction of shallow groundwater with stream water in the hyporheic zone (Boulton et al. 1998).

Landscape ecology is the scientific discipline best suited to this larger perspective of the riverine landscape: "...we perceive a need to conceptualize rivers not as sampling points, lines, or gradients, but as spatially continuous longitudinal and lateral mosaics. As such, heterogeneity in the river landscape, or riverscape, becomes the focus of study" (Fausch et al. 2002:485) (Figure 8.2). The foundational premise of landscape ecology is that both biotic and abiotic elements of the landscape interact with one another, and those interactions are spatially mediated (Malanson 1995).

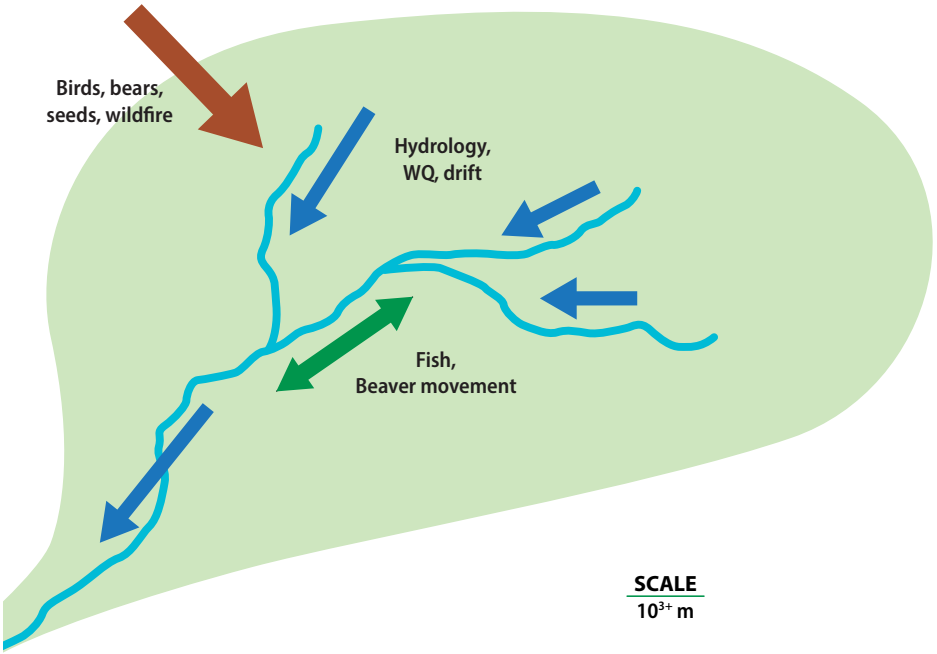


Figure 8.1. Movement of water and biota at the whole-watershed scale. WQ refers to water quality, and drift refers to the downstream transport of bottom-dwelling invertebrates by flowing water.

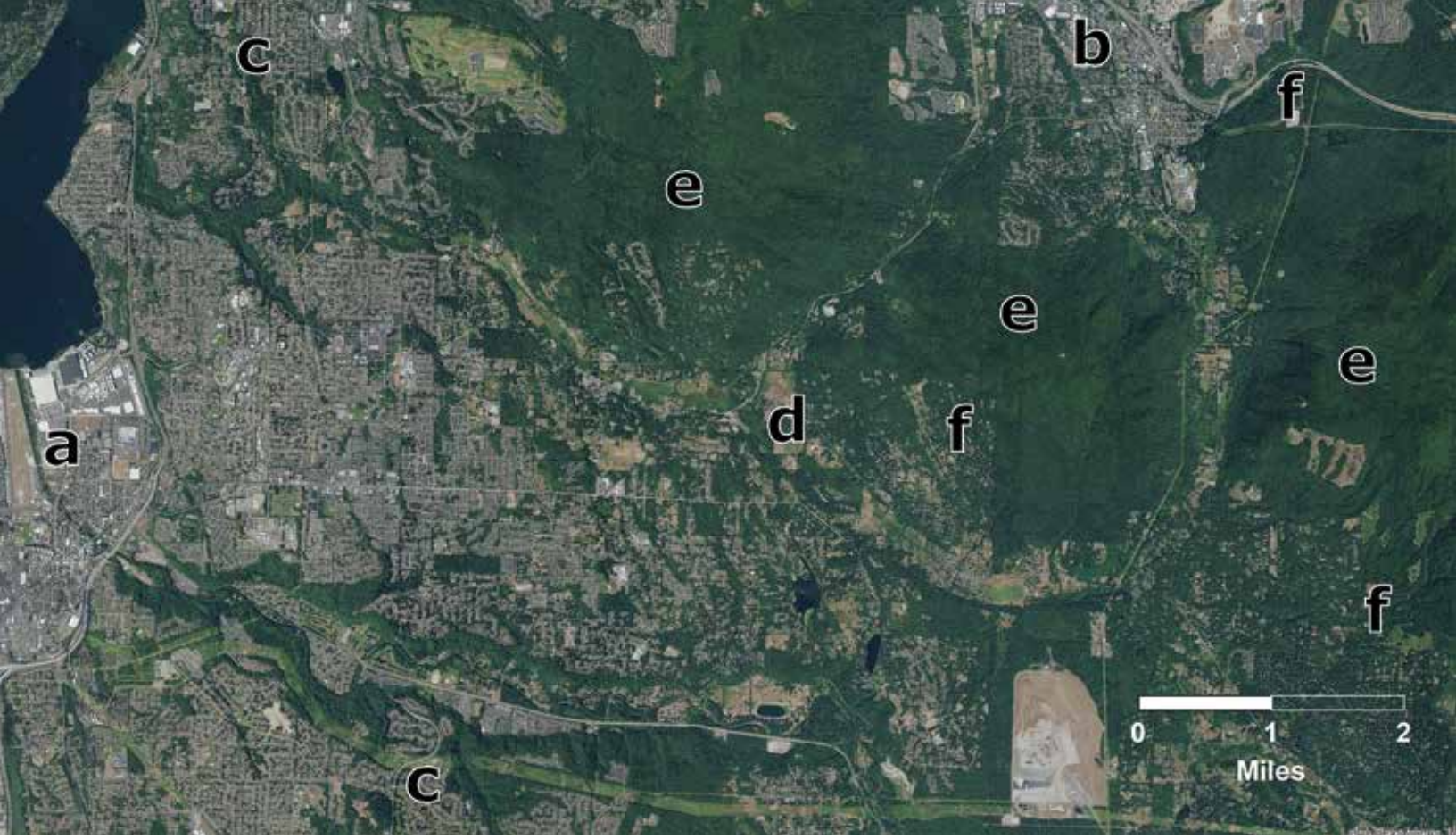


Figure 8.2. An example of landscape heterogeneity at multiple scales in an aerial view that includes the urban centers of Renton (west edge, labeled a) and Issaquah (northeast corner, b); suburban development throughout the south-central and northwest parts of the image (c); agriculture and rural-residential development, particularly in the valleys of May Creek and McDonald Creek trending NW across the center of the image (d); and extensive forest lands of Cougar, Squak, and Tiger Mountains (e) in the north-central and east parts. At finer spatial scales within the largely undeveloped areas in the eastern part of the image, fragmentation is nonetheless widespread from roads, utility lines, and clearing for residential lots and subdivisions (f).

This perspective emphasizes the importance of spatial heterogeneity; it also acknowledges the key role of episodic disturbances in determining the flux of energy and materials, the movement of organisms, and the creation of unique dynamics within the watershed (Wiens 2002).

At a finer spatial scale, water and biota interact across the permeable and dynamic boundary between riparian areas and a watershed's uplands (Figure 8.3, left panel). These areas comprise multiple components. Within riparian areas, these components include surface waters, in-channel bars and islands, floodplains, marshes, wet meadows, alluvial forests, and woody debris. For the uplands, these components might include unstable slopes, aquifer recharge areas, wetlands, seeps, forests, and areas of intensive human modification. Both areas also include the vast variety of organisms that occupy one or more of these habitats.



River running through rural residential area/Jane Atha, WDFW

Riparian areas occupy a particularly dynamic and disturbance-prone region (Figure 8.3, right panel) that can experience decadal, annual, or even more frequent flood events that locally alter, rearrange, or obliterate its components altogether.

> *In the natural state, riverine landscapes exemplify the* new paradigm in ecology *(sensu Talbot 1996), in which ecological systems are widely recognized as non-deterministic, open systems in continual states of flux, rather than internally regulated, homeostatic systems exhibiting equilibrium conditions. Yet, despite their highly dynamic nature, riverine landscapes provide predictable ecological conditions. Although individual landscape components exhibit high turnover, largely as a function of interactions between fluvial dynamics and successional phenomena, their relative abundances in the river corridor as a whole tend to remain constant over ecological time. [From Ward et al. 2002:518.]*

So, for example, a flood may scour a gravel bar at one location in a river and deposit sediment in another; but along any given channel reach the relative frequency of pools and bars may not vary substantially over time. The resulting transience and diversity of habitats provide a variety of habitats that, although ideally always present in aggregate, are not necessarily static in place or time (Robinson et al. 2002). Thus, managers should recognize this dynamic equilibrium as the key attribute of a truly functional riparian–aquatic ecosystem and make the protection of its dynamic *behavior* (rather than any specific *feature*) the overarching goal of riparian management.

Existing policies, however, generally do not facilitate management for dynamic conditions:

> *Policies setting underlying riparian goals that are essentially static and homogenous have become an integral part of many of the management guidelines that drive the goals for riparian management on federal, state and private lands in western Washington. Discussions [at a statewide forest management symposium] did not indicate that current management and policy guidelines necessarily preclude practices that might produce dynamic and heterogeneous riparian conditions. Because they promote uniform conditions over large areas, however, current policy and management guides do little to encourage treatments that would lead to ecologically diverse landscapes that could maintain critical functions that were formerly produced by natural disturbance regimes... [From Ryan and Calhoun 2010:viii-ix].*

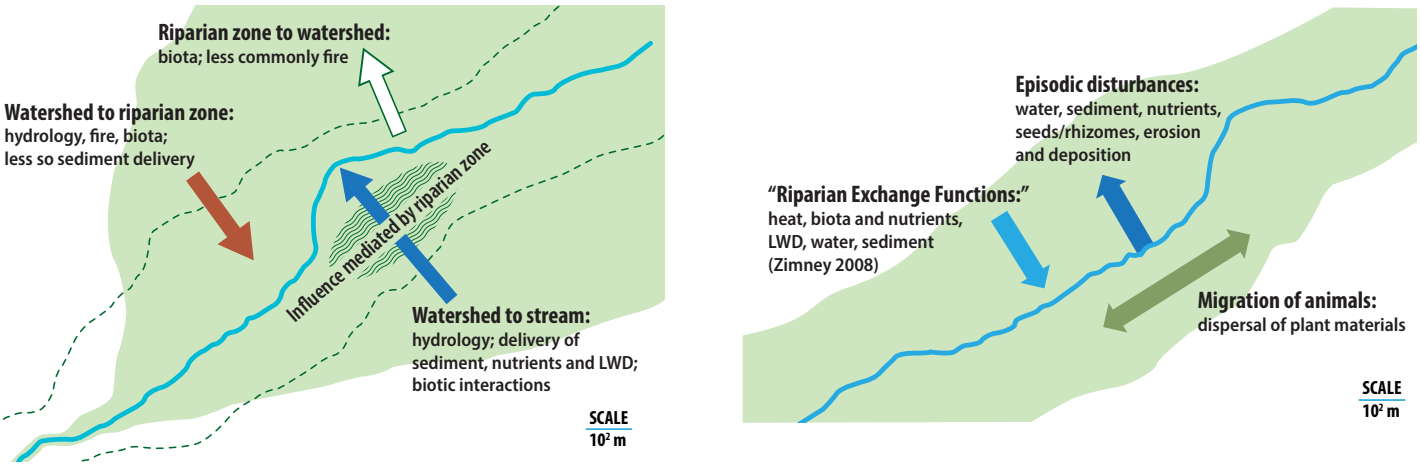


Figure 8.3. Movement of water, biota, and other elements of the aquatic system from the watershed into and through riparian areas (left) and between riparian areas and the stream (right).

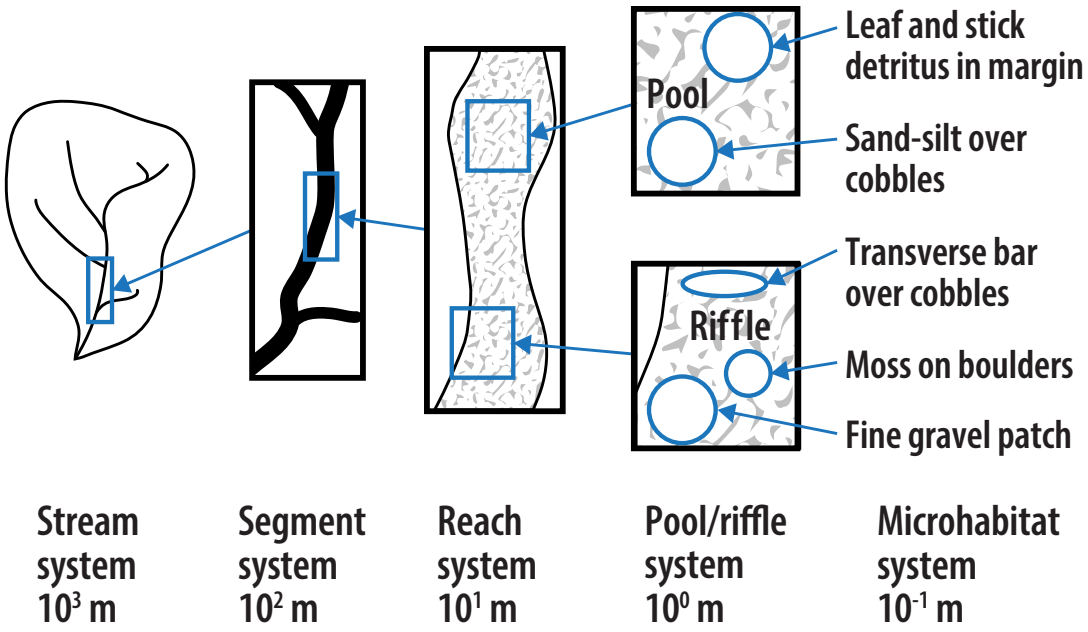


Figure 8.4. Hierarchical spatial organization of a watershed and its aquatic habitats. Approximate spatial scale, appropriate to second or third-order mountain stream (modified from Frissell et al. 1986).

On the other hand, riparian areas have experienced high levels of anthropogenic disturbance, both directly (e.g., harvest, road building) and indirectly (e.g., windthrow, landslides, and forest fire) due to forest management, which also compromises the dynamic equilibrium in riparian-aquatic ecosystems. In response, policy makers have reduced forest management-related disturbances in riparian areas, with the intent of passively reestablishing underrepresented late-seral classes (such as mature forest) which should improve riparian ecological functions, and conserve fish and wildlife species dependent on older forest. Such policies are all likely necessary parts of a successful riparian management strategy. However, because they do not address watershed-scale processes, these policies by themselves are almost surely insufficient to achieve desired riparian and aquatic ecosystem outcomes.

8.2.1. What are Watershed Processes?

Although the immediate goal of riparian management is the protection of species and their habitats, Frissell et al. (1986:199) suggested that "[w]e begin with the assumption that structure, operation, and other aspects of the organization and development of stream communities are largely determined by the organization, structure, and dynamics of the physical stream habitat." (Using the terminology elsewhere in this document, these terms correspond to the structure, composition, and functions of physical habitat). If so, "the problem becomes one of understanding these physical patterns across time and space. This requires a broad, integrative framework that places streams, their habitats, and their

communities in wider geographic context" (Frissell et al. 1986:200). Frissell et al. (1986) developed this wider context by describing a spatial hierarchy that recognizes the influence of larger scale conditions and processes acting primarily (but not exclusively) unidirectionally on smaller scales (Figure 8.4). Factors that are best characterized over the largest extents, and that exert their influence over longest time frames, can be thought of as the ultimate "drivers" of the conditions and processes at lower levels in the hierarchy.

Three overarching process drivers—climate, geology, and topography—structure the suite of landscape-forming processes that are distributed over a landscape and that, in turn, govern watershed characteristics and processes (paraphrasing the framework of Montgomery 1999). At management time scales (i.e., years to decades), these process drivers are invariant and immutable—they are the "givens" under which a watershed evolves. The physical habitat features of any watershed do not simply arise from these process drivers directly, however; instead, they are created and continuously modified by the fluxes of materials (particularly water and sediment) and energy that arise from these process drivers and are widely termed watershed processes. Watershed processes are defined as "[t]he dynamic physical and chemical interactions that form and maintain the landscape and ecosystems on a geographic scale of watershed to basins (i.e., hundreds to thousands of square miles)" (Stanley et al. 2011:8).

To this simple, unidirectional, physical model of watershed influences must be added a few complications of lesser but still critical importance. First, the flow of influence is not always one-way: although topography exerts the dominant influence on the flow of water, over time the erosion by that flowing water will alter the topography to some degree (which, over geologic time scales, may be sufficient to change the very boundaries of the watershed). Second, biota are not always passive respondents to the presence and changes of physical habitat, but instead can also influence that physical habitat in ways that are only slowly being recognized (see Moore 2006 for an overview of such effects). Robinson et al. (2002) emphasizes the role of fauna as ecosystem engineers of riverine landscapes, for which the modification of stream substrates by spawning salmon (Montgomery et al. 1996) or the rearrangement of floodplain dynamics by Beaver (Pollock et al. 2003) are two widely recognized examples. Biological conditions and processes are also of fundamental importance to the expression of some watershed processes: the flux of nutrients may not alter the physical habitat but is key to the health of the ecosystem; the character and extent of vegetative cover will greatly mediate the effects of topography, climate, and geology on the movement of runoff, the downslope transport of sediment, and the potential for dramatic, process-altering wildfire. Finally, the effects of people and human activities cannot be ignored in any useful conceptual framework applied to the modern landscape. Although direct modification of habitat and streams is an obvious impact with a long historical legacy in the Pacific Northwest (and beyond), the aggregate effects of human activities across whole watersheds can be even more consequential to instream resources, to the extent that land use, in many settings, becomes no less of a process driver (i.e., a determinant in a watershed) than is topography or climate.

These concepts are integrated into Figure 8.5, which emphasizes the unidirectional, hierarchical flow of influence from the large-scale process drivers onto the watershed processes that, in turn, give rise to the instream physical and ecological conditions and responses. This representation is not intended to deny the *upstream* influences that also occur (see Beechie et al. 2010, Figure 1 as an alternative representation), but it sacrifices completeness for clarity in acknowledging the overriding importance of this unidirectional perspective. This conceptual model also articulates the variety of processes that are embraced within each of the major watershed processes we

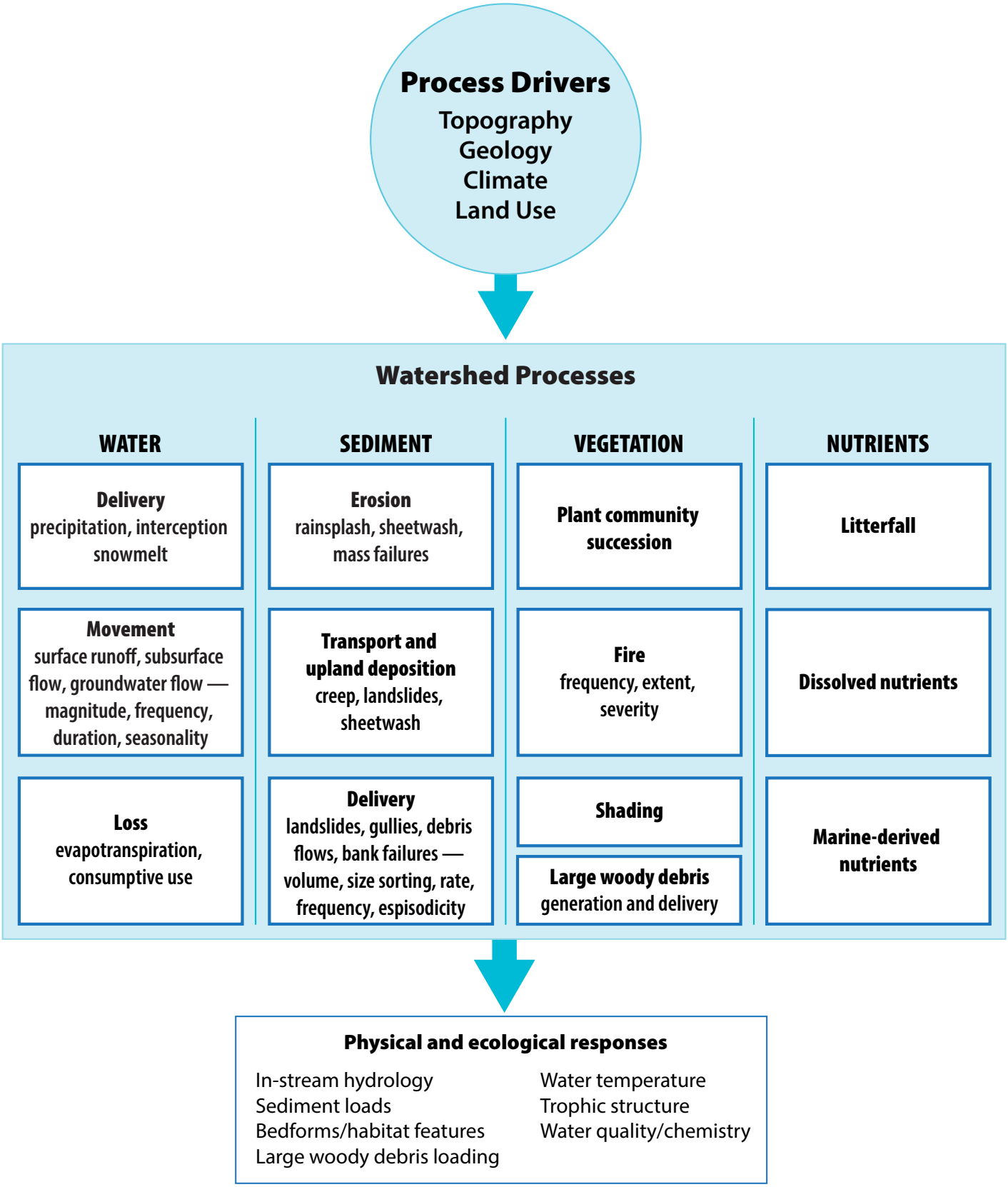


Figure 8.5. Conceptual framework for the hierarchical relationship of invariant, large-scale process drivers, the suite of watershed processes that are determined by these drivers, and the instream physical and biological responses to those processes. Multiple additional interactions between elements and levels are not shown on this diagram to emphasize the primary influences; but in any given setting, one or more of these secondary interactions may temporarily achieve equivalent importance. This framework embraces the definition of watershed processes from Stanley et al. (2011:8): "[t]he dynamic physical and chemical interactions that form and maintain the landscape and ecosystems."

recognize (water, sediment, vegetation, and nutrients), and it reminds us of the major instream responses to these dynamic watershed processes.

8.2.2. How Does the Watershed Affect Instream Conditions?

The direct effects (both physical and biological) of watershed processes on the stream channel are most commonly understood as the delivery of material from the watershed, with or without some attenuation or other modifications as they pass through the riparian ecosystem: water, sediment, nutrients, pollutants, and large wood. These materials are delivered primarily by surface water flow, subsurface flow, landslides and debris flows (Figure 8.6). These fluxes of material and energy from the broader riverine landscape interact with those arising from the riparian corridor itself, to different degrees and over different time scales, with a resulting complexity that defies our current efforts to quantitatively predict their expression in the physical form or biological condition of a stream.

The complexity of these interactions is highlighted by relatively weak correlations reported between various instream features and landscape predictors, regardless of the spatial scale being evaluated (e.g., whole-watershed vs. riparian areas). For example, Anlauf et al. (2011) evaluated the correlation between eleven instream habitat features with landscape variables characterizing both process drivers (e.g., watershed gradient, rainfall) and management-influenced factors (e.g., forest cover, disturbance history, road density) across 121 coastal Oregon streams. The strongest relationships showed unexceptional correlations between particular habitat features and the suite of landscape variables (active channel width, R^2 = 0.72; percentage of fine sediments, R^2 = 0.48). Other habitat features expressed essentially no relationship (percentage gravel, R^2 = 0.05; pools per 328 ft (100 m), R^2 = 0.11; percentage secondary channel area, R^2 = 0.12). Including management-influenced predictors increased adjusted R^2 values only modestly (by up to 16%). Many of the strongest relationships followed intuitive expectations, such as: "Wood volume was associated with several landscape predictors reflecting wood availability (% non-forest, % small trees, and % remnant forests), whereas pools per 328 ft (100 m) were associated with disturbances affecting pool retention (cow density, road density) and pool formation (% small trees)" (Anlauf et al. 2011:708). However, no relationship was sufficiently strong to suggest that either deterministic understanding or statistical correlations are sufficient to precisely characterize the influence of watershed-scale processes on a stream.

Our inability to predict instream conditions from watershed processes and riparian conditions with any useful degree of accuracy is widely recognized. In part, this inability is because the riparian corridor itself has significant, complex effects on the stream (see other chapters in this document). In addition, all of these influences—at every spatial scale—occur within a time-dependent framework mediated by rates of vegetation growth and decay, seasonal variations in flow, and episodic disturbances from floods, and even less frequent but potentially long-lasting channel impacts from fire or landslides (Lake 2000; Roper et al. 2007; Luce et al. 2012; Jellyman et al. 2013).

> ***[E]mpirical associations between land use and stream response only varyingly succeed in implicating pathways of influence. This is the case for a number of reasons, including (a) covariation of anthropogenic and natural gradients in the landscape; (b) the existence of multiple, scale-dependent mechanisms; (c) nonlinear responses; and (d) the difficulties of separating present-day from historical influences. [From Allan 2004:257.]***

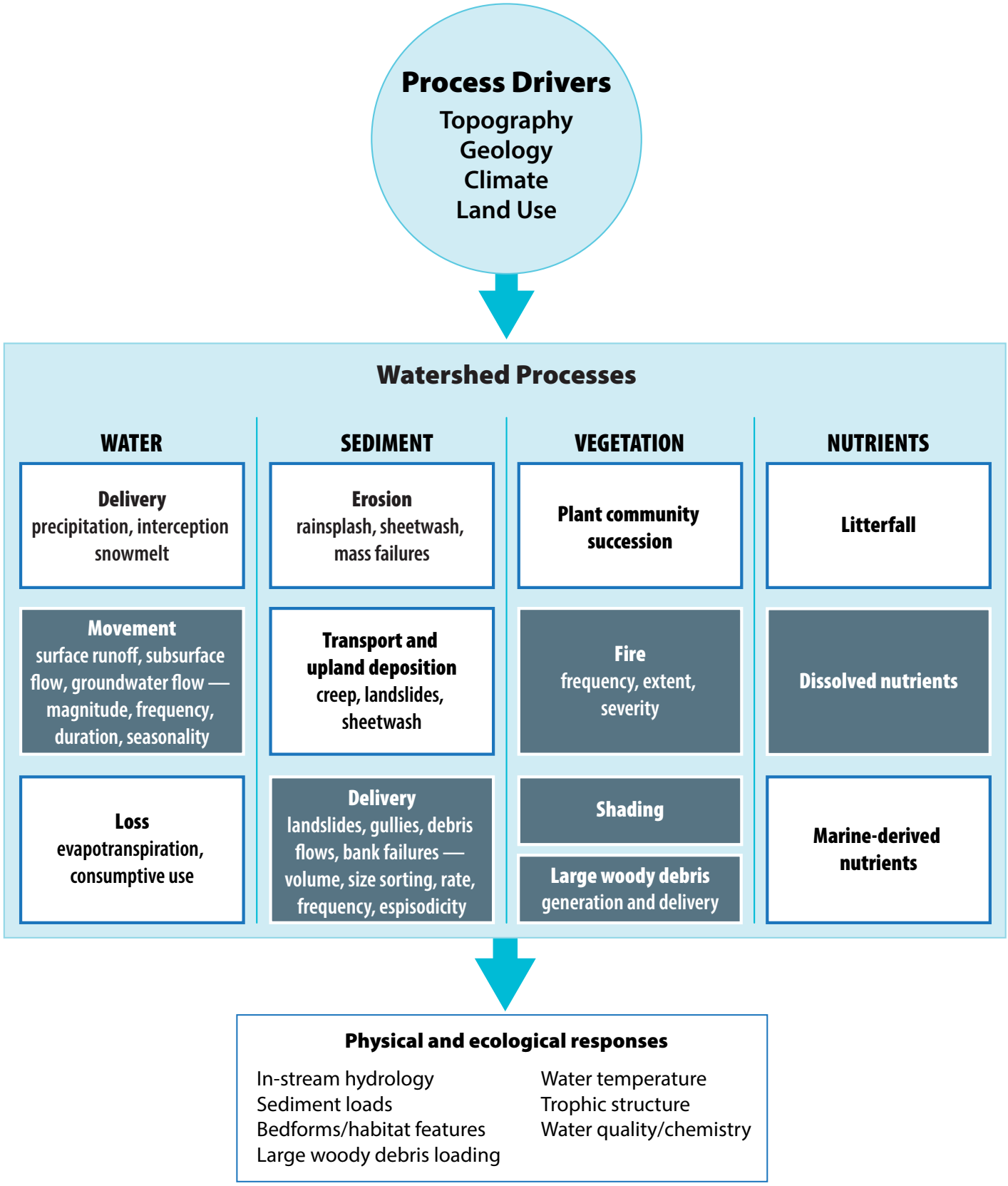


Figure 8.6. The conceptual framework of Figure 8.4, highlighting the subset of watershed processes (dark shaded boxes) that most directly affect instream conditions.



Clearcut harvest in a managed forest landscape/Jane Atha, WDFW

Regardless of our present inability to make reliable predictions of instream conditions from watershed processes, watershed processes do create and maintain instream habitat, and so the determinants of those processes are of indirect, but ultimately critical importance, to the understanding and the management of aquatic resources. Because the nature and intensity of these processes are strongly influenced by prevailing (and past) watershed land use(s), the effects of the dominant land use activities of the Pacific Northwest are discussed individually.

Forestry

The effects of watershed-scale forestry on instream conditions have been a primary focus of scientific research and forest practice regulations for many decades. Most of the attention has been paid to several discrete problems: increased stream temperature from loss of riparian vegetation, the degree to which large-scale loss of forest canopy alters the hydrologic regime, whether the creation of new roads has a discernible impact on both hydrology and sediment delivery to the channel network, and whether forest practices increase the frequency and intensity of debris flows and other forms of mass failure that reach the stream.

The potential for hydrologic alteration in logged watersheds focuses on two major mechanisms: 1) the loss of forest canopy, which should increase total water yield by reducing interception and evapotranspiration, and increase accumulation of snow on canopy-less ground, which increases the total volume of water available during subsequent rain-on-snow events, and 2) more rapid drainage of surface runoff to stream channels from a newly created road network. The review article of Andréassian (2004:12) provides a convenient summary of much of the voluminous literature on this topic, concluding that "deforestation could definitely increase both flood volumes and flood peaks. However, this effect is much more variable than the effect on total flow and may even be inverted in some years or in some

seasons." The underlying causes for such increases are associated not only with the loss of forest canopy but also (and, perhaps, primarily) the consequences of soil compaction and development of the road network.

Increased sediment delivery to streams from watersheds is an anticipated outcome of both the direct and indirect effects of logging. Direct consequences result from the loss of canopy cover, increasing the potential for rainsplash and sheetwash erosion in areas of intrinsically low infiltration capacity, and the eventual loss of soil cohesion in areas of steep slopes. Indirect effects result from the construction of roads, for which inappropriate siting can result in sheetwash erosion and a greater incidence of landslides and debris flows from either concentrated road runoff or failure of the road prism itself. A variety of case studies making use of detailed field mapping, radionuclide tracers, and suspended sediment measurements have implicated various landscape features and erosive processes in post-logging watersheds, such as skid trails and landings, promoting surface runoff and erosion (Wallbrink et al. 2002), enhanced gully erosion (Reid et al. 2010), and road-initiated debris flows (May 2002).

Nutrient dynamics across the watershed are also affected by forest practices, with potential effects throughout the ecosystem (including the channel network and its riparian corridor). Richardson et al. (2005) offered a well-focused and detailed evaluation of the consequences of watershed disturbance, including logging, on the delivery and retention of organic matter in small streams of the Pacific Northwest. He noted that the replacement of coniferous with deciduous trees in recently logged areas can increase the delivery of nutrients, but that more rapid breakdown of delivered material and the accompanying reduction in both large wood and channel complexity, commonly expressed throughout the channel network of logged watersheds, "could produce a substantial reduction in stored organic matter." (Richardson et al. 2005:930).

Agriculture

Cultivated agriculture normally occupies a comparatively narrow range of low-gradient settings in a watershed. Thus, processes associated with steep slopes—particularly landslides and debris flows—found in logged watersheds are nearly absent here. However, the working of the agricultural land surface is far more intensive where it does occur, and a wider range of water-borne contaminants are potentially introduced. As with forestry, hydrology, sediment delivery, and nutrient dynamics are all affected by agricultural land use, but the nature and severity of its impacts on instream resources can be quite different. Runoff from agricultural watersheds, notably its load of nutrients and pesticides, were the historical impetus for the use of riparian buffers under an assumption of surface-runoff filtration (Osborne and Kovacic 1993). Brown et al. (2009) found that the legacy of prior agricultural land use, even in areas presently undergoing urbanization, is one of the strongest determinants of instream conditions in their nine study areas nationwide.

Grazing is a second, broad category of agricultural activities with significant impacts to streams, primarily as a result of direct encroachment into riparian areas and the channel itself. Belsky et al. (1999:2) reviewed dozens of mid- to late-20th century evaluations of grazing throughout arid lands of the American West that evaluated impacts to water quality and temperature, hydrology, channel geomorphology,

Watershed processes help create and maintain instream habitat. Thus the determinants of those processes are indirect but critically important to the understanding and the management of aquatic systems.

wildlife, and instream and riparian-zone vegetation. Their conclusion was that "[n]o positive environmental impacts were found" as a result of grazing, and they advocate complete cessation of grazing as the only sure course for recovery of riparian areas. More recent work (e.g., Agouridis et al. 2005; Raymond and Vondracek 2011) suggest that various strategies of rangeland management may have local success at reducing the magnitude of such impacts; but the large spatial extent over which grazing occurs in certain areas of the Pacific Northwest continues to make this a regionally significant impact to streams and riparian areas.

Urbanization

Urbanization is widely recognized to be the most intensive land use affecting watershed processes. It is also typically the most permanent, insofar as urban developments are rarely returned to anything approaching a natural state, a transition that is not precluded by agriculture and is quite practical in commercially managed forests. As a pervasive, near-total conversion of the land surface, urbanization has the ability to alter each of the dominant watershed processes wherever it occurs: hydrology (both surface and groundwater); the delivery of sediment, nutrients, pollutants, and sunlight; and the interaction of upland/terrestrial biota with the stream channel (Booth et al. 2004; Walsh et al. 2005). Nearly all of these alterations stem from the same fundamental change: the conversation of the land surface, with its vegetative cover and natural soils, to a variety of impervious and near-impervious surfaces. Undisturbed riparian corridors are widely recognized as useful protective measures for streams in urban areas, but all multi-scale evaluations of urban land cover and instream quality affirm the shared importance of not only riparian areas but also upland urbanization in ultimately determining instream conditions (e.g., Wang et al. 2001; Morley and Karr 2002). These watershed-level effects are significant at even low levels of urbanization (e.g., Vietz et al. 2014), and to date they have proven virtually impossible to control under typical riparian-management policies, highlighting the continuing challenge of achieving meaningful aquatic-system protection in an urbanizing watershed.

8.2.3. How Does the Watershed Affect Riparian Areas?

Changes to an upland watershed and watershed processes can also affect the conditions and functions of riparian areas directly (Figure 8.7). Although a riparian area is commonly defined in terms of its relationship to the stream, it also has a relationship to the uplands that surround it. Water from the stream channel will commonly be the riparian area's dominant source of both overland flow (during floods) and groundwater, but adjacent upland water sources can support riparian hydrology during periods of low flow. Much of the sediment that originates from the uplands is transported directly to the streams via channeled flow, but some fraction of that load will deposit before ever reaching the main channel, particularly if the riparian area includes a broad, low-gradient floodplain or if delivery occurs via episodic and channel-overtopping debris flows. Upland vegetation "buffers" riparian areas, providing

More important than simply protecting the habitat itself is protecting the processes that create and sustain that habitat. For this strategy to be successful, however, space in which that habitat can be expressed must also be protected.

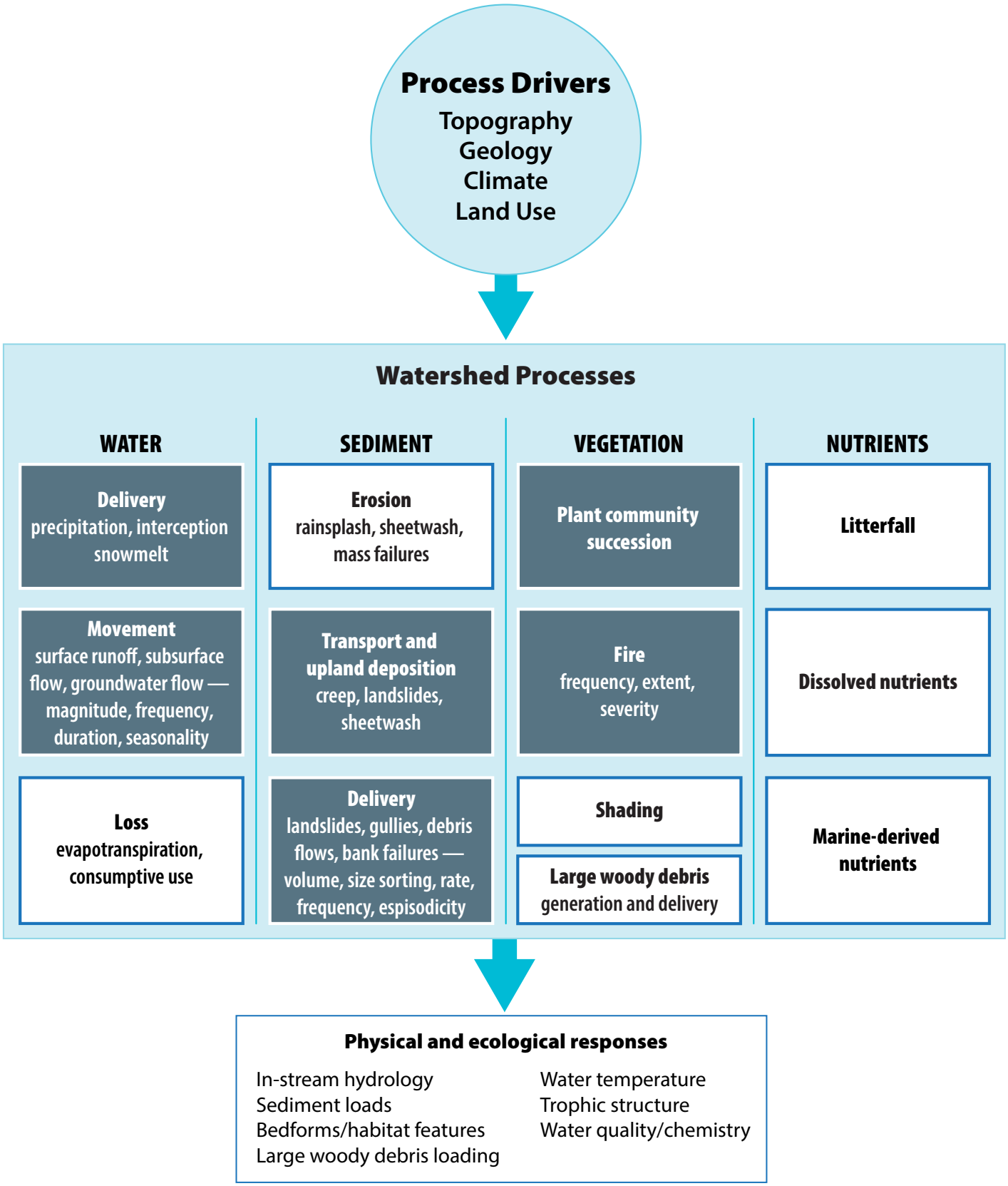


Figure 8.7. The conceptual framework of Figure 8.4, highlighting the subset of watershed processes (dark shaded boxes) that most directly affect conditions in riparian areas.

ecological connectivity between upland plant and animal communities with their riparian counterparts, and providing protection from mechanical disturbances, such as windthrow. Uplands also constitute a broader environment that either supports or suppresses wildfires that may freely cross the upland/riparian boundary.

Various land uses are relatively consistent with respect to their particular impacts to riparian ecosystems. That is, all three of the primary types (forestry, agriculture, urban) physically remove native vegetation, with differences only in the degree of impact. The loss of upland vegetation will consistently affect ecological connectivity and the risks of windthrow and fire regardless of the specific upland land use.

The interactions between uplands, riparian areas, and instream conditions are particularly complex with respect to wildfire. Arkle et al. (2010:299) found that "increasing riparian burn severity and extent were associated with greater year-to-year variation, rather than a perennial increase, in sediment loads, organic debris, large woody debris (LWD) and undercut bank structure." They emphasized a decrease in the stability of physical habitat and high variability in macroinvertebrate communities, which they attributed to annually fluctuating loadings of sediment, large wood and other organic material. They did not recognize any tendency for the macroinvertebrate community to become more like those of relatively undisturbed, reference streams over time, suggesting that changes to wildfire regime can result in permanent changes to stream ecosystems, and that these changes are a result not only of direct influence of burned areas on the stream but also of a permanently altered structure of the riparian corridor. With greater human disturbance, invasive species with high flammability (including those that have begun transforming riparian areas from fire breaks to fire-prone areas of a landscape; Coffman et al. 2010) become more common, as does the greater overall frequency of wildfire in modern human-dominated landscapes (Keeley et al. 2009). Thus this process driver, operating largely independent of typical considerations of riparian area management, can have a profound influence on instream resources (Pausas and Keeley 2014).



Wildfire in Methow River valley, 2018/ Scott Fitkin, WDFW

8.3. The Role and Limitations of Site-Scale Riparian Area Management

Whereas large-scale watershed processes govern the interactions and delivery of water, sediment, organic material, and nutrients to the stream over long distances, the effects of riparian vegetation on physical and ecological processes occur over much shorter distances with complex, direct, time-dependent interactions. These effects are expressed along river corridors "by influencing temperature and light regimes; producing organic detritus (leaf litter, woody debris); by routing water and sediment; by structuring the physical habitat at several scales; by providing a substrate for biological activity and habitat/cover for aquatic, amphibious and terrestrial animals" (Ward et al. 2002:524). For this reason, particular management attention to riparian areas is warranted, insofar as this part of a watershed has a unique, intimate interaction with the stream channel and its biota. Previous chapters explore these specific interactions in detail.

In addition to spatial relationships, temporal interactions are fundamental attributes of aquatic and riparian habitats. These habitats can be created by disturbances and also are episodically affected by them—streams are not static. Just as the influence of process drivers is not uniform across a watershed, so also is the influence of disturbances. In the case of floods, the most common and obvious of disturbances in rivers, this variability is primarily temporal and can be expressed through flood frequency, duration, seasonality (i.e., when in the year they occur), magnitude, and the predictability of occurrence (Lytle and Poff 2004).

The expression of these drivers, their interactions within a watershed and in individual streams, and their variability over time creates and maintains a dynamic mosaic of habitats. These interactions among drivers are complex and intertwined even in the absence of anthropogenic disturbances. Therefore, scientists have had difficulty separating the effects of the different drivers independently and in assessing how any species (even well studied salmon species) respond to this mosaic (Fausch et al. 2002). Adding to this complexity is the fact that habitats are species-specific; what constitutes habitat for one species may be mostly unrelated to what constitutes habitat for another aquatic species in the same river.

Thus, if riparian areas are managed with the objective of maintaining high-quality habitats for aquatic species, managers must ensure that riparian areas contribute what they can (i.e., separate from, but in combination with, watershed processes or drivers) to the long-term maintenance of the temporally variable spatial mosaic of habitat conditions. The mere presence of these habitats, however, is not sufficient: they must exist in configurations that are advantageous to aquatic species, with sufficient variety to support multiple life stages, adequate size and number to support a population, sufficiently proximate to be accessible from one to another, and yet sufficiently distal to not be subject to the same deleterious disturbances.

This, then, defines the fundamental challenge of watershed and riparian ecosystem management: given a system of great diversity and complexity, with attributes that can vary greatly and unpredictably in their influence over time, and biological communities that depend on both the diversity and interconnections between habitats, what fundamental principles should guide management to perpetuate fish and wildlife? We return to this question in the last section of this chapter.

8.4. Integrated Effects of Site-Scale Riparian Areas Management

"Connectivity" is the term most often used to describe whether organisms can move from one habitat to another (Taylor et al. 1993). It comprises two parts: structural connectivity, the physical relationships among habitat patches without regard for the behavior or organisms; and functional connectivity, the degree of movement of organisms through the landscape (Taylor et al. 2006; Kadoya 2009). The two are obviously related in all landscapes, but lotic systems impose some characteristic influences. First, there is a strong (though not universal) downstream bias on functional connectivity, insofar as most organisms and all inert constituents move in the direction of water flow. Second, impediments to flow can impose partial barriers to both structural and functional connectivity, but to very different degrees. For example, a culvert may allow most or all discharges to pass unimpeded but nevertheless present a barrier to migrating salmon (e.g., Davis and Davis 2011).

Concern over longitudinal barriers along a channel network typically focuses on the effects of instream physical barriers, particularly dams, culverts, and road crossings, rather than the consequences of longitudinal disturbances to riparian areas more broadly. Instream connectivity and riparian connectivity are related, however, even if they are not direct surrogates. Some types of discontinuity (e.g., a road running perpendicular to the stream) will affect the longitudinal connectivity (both structural and functional) of both; but others (e.g., an impassible migration barrier in the stream) will affect the movement of aquatic and terrestrial organisms quite differently. Most importantly from the perspective of riparian management, alterations that are limited to riparian areas can nonetheless affect instream (functional) connectivity. For example, loss of shading from riparian area disturbance (Chapter 4) can create unfavorable instream temperatures that impact the movement or outright survival of migrating salmonids (e.g., Thorstad et al. 2008; Martins et al. 2012). Other direct and indirect actions, such as channelization, removal of large wood, or bank failures from vegetation loss can affect connectivity for migratory fish and among other aquatic species, and alter the flow of material and nutrients through the stream network.

These impacts have been explored in a variety of studies at multiple scales. Flitcroft et al. (2012:288) reported that "…[spatial] network variables perform better at explaining juvenile Coho Salmon *Oncorhynchus kisutch* density than instream habitat variables. Moreover, analysis of network distances among seasonal habitats indicates that juvenile Coho Salmon density may be higher where the distance between critical seasonal habitats is short." Perkin and Gido (2012:2183) found lower species richness in fish communities in stream networks fragmented by road crossings across multiple spatial scales. "Our findings support network connectivity as a mediator of ecological processes occurring within complex dendritic ecosystems and promote the need for improved connectivity to enhance conservation of metacommunity dynamics and biodiversity in dendritic ecological networks." Similarly, Favaro et al. (2014:1815) interpreted their findings on the influence of culverts in a channel network to demonstrate that "…fragmentation of habitats and populations acted on a whole stream scale rather than being restricted to within-stream differences that related to position."

These findings speak to the importance of recognizing the channel as part of the riparian ecosystem, that is, they form an interconnected system, both laterally and longitudinally. The degree to which seemingly isolated discontinuities affect either of these elements directly can ultimately impact the entire ecological network. Prescriptive management is challenging, however,



Chum Salmon Oncorhynchus keta *need connected habitat to reach spawning grounds/Alex Biswas, WDFW*

because the ecological functions of any given site or habitat patch along a channel network depend on its context and interconnection with other such sites. Furthermore, not all habitats have the same value for all species:

> ***The relationship between species richness and connectivity is therefore determined by complex relationships among several interacting variables. In addition, species richness maxima for different faunal and floral elements occur at different positions along the connectivity gradient (Tockner et al. 1998). Fish diversity, for example, may peak in highly connected habitats, whereas amphibian diversity tends to be highest in habitats with low connectivity. Other groups attain maximum species richness between these two extremes. The resulting pattern is a series of overlapping species diversity peaks along the connectivity gradient, suggesting that habitats collectively traversing a broad range of connectivity will optimise community diversity in riverine landscapes. [From Ward et al. 2002:535.]***

Although such studies emphasize the importance of connectivity along the channel corridor, they offer little guidance for managing these barriers and discontinuities beyond *less is better.* The impacts of road crossings, in particular, have been evaluated in several studies in Pacific Northwest lowland streams, comparing measures of biological conditions with the frequency of crossings that describe a negative, monotonic relationship (May et al. 1997; McBride and Booth 2005). Unfortunately, these studies do not suggest a consistent, discrete threshold of impacts that might serve as a management objective. For example, the study of McBride and Booth (2005) showed correlations between biological health (as characterized by a multi-metric index of benthic macroinvertebrates) and road crossings with more than three crossings per km, whereas the biological differences reported by Perkin and Gido (2012) occurred on fragmented streams with as few as one road crossing over a stream segment length of one to many kilometers.

The overarching message from these studies is that any given implementation of site-scale riparian area management does not occur in a vacuum: "protecting a site" has ecological meaning only within the context of the entire channel network. Although existing computational tools can characterize the degree of fragmentation from discontinuities or the spatial coherence of a riparian corridor of varying width, the existing literature suggests that we lack clear deterministic linkages between alternative riparian management strategies and the resulting response of instream organisms, particularly the identification of thresholds of disturbance that impact fish mobility. However, any management action that results in frequent interruptions to riparian areas, or riparian corridors where blockage of terrestrial and aquatic organisms is not fully mitigated, is sure to have deleterious impacts to aquatic and terrestrial system health.

8.5. Managing Riparian Areas From a Watershed Perspective

The perspective of riparian area management developed in this chapter has been intentionally expanded, in both space and time, beyond that normally applied (and most feasibly implemented) in the Pacific Northwest. It relies heavily on the active research in the field of landscape ecology, which is organized around a few themes of particular relevance to riparian area management: 1) patches differ in quality, 2) patch boundaries affect flows, 3) patch context matters, 4) connectivity is critical, 5) organisms are important, and 6) scale is important (Wiens 2002:501). We will explore each of these in turn with an eye towards how management of riparian areas might be improved with respect to perpetuating fish and wildlife.

8.5.1. Patches Differ in Quality

Not every location along a stream is equally influential on the physical processes or ecological functions of the riparian-aquatic ecosystem. This generalization is complicated, however, by the fact that different perspectives may not assign the same level of "influence" to every location. For example, bedrock-bound channels have very limited capacity for response (Montgomery and Buffington 1997), despite the potential for highly variable, episodic inputs of water and sediment. Thus, from a geomorphological perspective they might be considered less sensitive and so "less critical" for riparian area protection. However, such channels commonly occupy headwater, high-elevation positions in their watersheds that host potentially critical habitat(s) for a variety of non-fish species. A general treatment of the topic such as this cannot resolve the multiplicity of such complex phenomena across the diversity of landscapes in the Pacific Northwest, but this brief discussion suggests the importance of recognizing the range of riparian functions that must be served, and the improbability that they are all of equivalent importance throughout a channel network.

8.5.2. Patch Boundaries Affect Flows

In general, riparian regulations rarely consider the nature of the transition from riparian to upland (i.e., from regulated to unregulated) areas. This theme provides a reminder that the character of those transitions can affect each of the patches through the flux of material, energy, and organisms across their shared boundary. So, for example, when what was once a part of a forest interior becomes the exposed edge of a buffer strip, adjacent to recently cleared uplands, windthrow can greatly increase (and so compromise the riparian management area itself). Direct adjacency of a riparian area to urban development can invite substantial human intrusion (e.g., invasive species, excess nutrients, pesticides) into the riparian area, reaching all the way to the nominally protected stream because attention is not given to the relationship of upland development to the riparian area, nor to the "porosity" of the boundary between them.

8.5.3. Patch Context Matters

Riparian areas within separate watersheds containing different land uses (e.g., forestry, agricultural, urban) provide very different ecological functions depending on the adjacent land uses. The impacts to a stream from watershed urbanization, for example, span the range

from pervasive hydrologic changes (for which buffers are typically irrelevant) to pesticide-laden run-off (for which the pollutant removal that a buffer provides may be somewhat to highly effective). In a forestry dominated watershed, primary concerns may be the potential for unnaturally high delivery of sediment from increased rates of mass wasting; or potential losses of streambank integrity, habitat complexity, shading, large wood, and allochthonous inputs of organic matter.

According to Hansen et al. (2015:54):

> ***Our review demonstrated that greater widths were required to achieve objectives when adjacent land use intensity was high, or when the objective of management was improving terrestrial biodiversity (particularly fauna). This becomes problematic when intense land use practices occur on small properties, reducing the amount of riparian land that can economically be protected or targeted for management…For example, if we apply the evidence summarized here to a streamside property used for dairying in the lower Hunter River, New South Wales, a riparian zone width of 40 m may achieve ≥75% reduction of nitrogen inputs to the river and reduce streambank erosion, contributing to improved downstream water quality. However, the same investment in riparian set-aside in the upper reaches of the Hunter catchment may provide additional improvements to stream nutrient processing (Lowe and Likens 2005), aquatic biodiversity (Chessman et al. 1997) and bird diversity (Bennett et al. 2014).***

8.5.4. Connectivity is Critical

Connectivity in riparian areas occurs not only parallel to the stream (previous section), but also orthogonally to the channel in a lateral dimension – from the stream through the riparian area into uplands–and the vertical dimension in the hyporheic zone. Typical riparian area regulations are generally successful at maintaining connectivity in the longitudinal dimension at some minimum width, although the consequences of limited interruptions to longitudinal connectivity (e.g., bridges, utility crossings) are commonly dismissed, a consequence of viewing riparian areas only from the perspective of lateral width rather than a recognition of the importance of stream network connectivity.

Longitudinal connectivity is especially important for the movement of sediment, large wood, and other organic matter. Fox (2003), for instance, found that the condition of riparian areas was a reasonable predictor for the quantity of large wood key pieces in adjacent stream channels; however, upstream basin characteristics and processes were likely responsible for most of the large wood in larger channels. Therefore, land managers should not base site-level objectives for in-stream large wood on the condition of adjacent riparian areas alone, but should also manage riparian areas at the watershed scale to provide adequate in-stream large wood throughout a watershed's stream network.



Issaquah Creek is a tributary to Lake Sammamish in King County/ Derek Booth

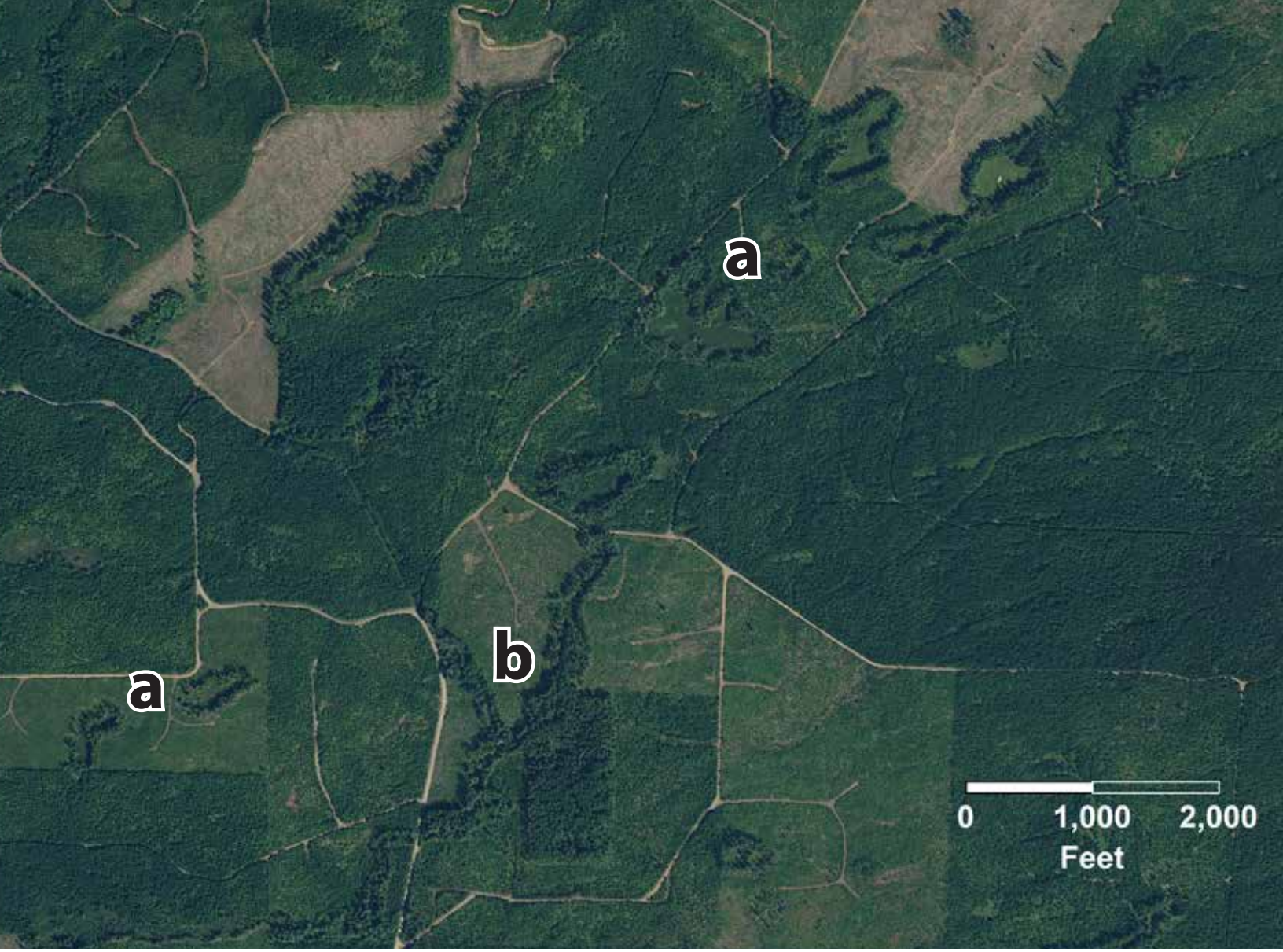


Figure 8.8. View of isolated wetlands (a) and riparian management zones (b) in a commercially logged portion of southwest Washington, providing some degree of local, structural connectivity within each buffer but no functional connectivity between them. Forested buffers in this image are approximately 50 feet (15 meters) wide.

Lateral connectivity, particularly between the riparian area and the adjacent uplands, is a more complex relationship, because improving this connectivity simultaneously enhances ecosystem protection but can also compromise the protection of a stream from upland activities. Continuity of a protected riparian area with uplands that are protected as well provides a range of key habitats for mobile species that depend on both upland and riparian environments for different needs or at different life stages. Separated patches with relatively porous boundaries may achieve only a modest fraction of these benefits, however, and truly isolated riparian–upland patches may be no better than an absence of such habitats altogether (at least for many terrestrial species of concern) (Figure 8.8). Porous boundaries also run the risk of compromising some of the primary goals of a riparian management area, and so the nature of connectivity does not universally result in beneficial outcomes (see 8.5.2 above).

Vertical connectivity occurs at the ecotone between stream water and deeper groundwater. This ecotone, known as the hyporheic zone, is comprised of coarse sediments, and the vertical connectivity occurring there is more commonly referred to as hyporheic exchange (Boultan et al. 1998). Hyporheic exchange includes

water, dissolved solutes, fine sediments, fine organic matter, and small organisms. The size of the hyporheic zone is enlarged by structures such as large wood and boulders that store sediment. Hyporheic exchange is enhanced by structures such as large wood or boulders that redirect flow into the streambed and by undulations in channel morphology (e.g., meanders, pool-riffle beds) that intercept the flow of water.

In summary, the importance of connectivity is broadly recognized:

> ***Restoration of important ecological processes often implies improving connectivity of the stream. For example, longitudinal and lateral connectivity can be enhanced by restoring fluvial dynamics on flood-suppressed rivers and by increasing water availability in rivers subject to water diversion or withdrawal, thereby increasing habitat and species diversity. Restoring links between surface and ground water flow enhances vertical connectivity and communities associated with the hyporheic zone. [From Jansson et al. 2007:589.]***

However, tangible recommendations for how best to manage for this outcome in typical regulatory settings are more elusive.

8.5.5. Organisms are Important

Although not strictly an issue of spatial or temporal relationships between landscape elements, the recognition of organisms as key elements of riverine composition, structure, and functions is a valuable contribution of landscape ecology to watershed management. Some of these influences have been long-appreciated: the importance of large wood to stream structure and salmonid habitat, the role of root strength in mediating bank erosion, and indeed the entire construct of conserving riparian areas of native



Black Bear Ursus Americanus *feeding on grass/Scott Fitkin, WDFW*

vegetation to maintain ecosystem health. However, this perspective has broadened our appreciation of the multiple ways in which biota interact with the physical environment and each other to support the full range of watershed processes and thus the systems that depend on them (Beavers, bears, and marine nutrients, etc.). Management of riparian areas thus must include not only some awareness of the watershed in which that riparian area exists but also the biota that inhabit this environment (and, in some cases, move beyond its boundaries), and the ways in which those biota support the integrity of the aquatic ecosystem (Robinson et al. 2002).

8.5.6. Scale is Important

The goals and application of riparian management actions are generally limited in both space (i.e., the site) and time (i.e., the present). In a system as interconnected and disturbance-prone as a stream channel network, however, the site-scale management of a riparian area is *necessary*, but not *sufficient*, to ensure the desired composition, structure, and functions

of riparian and aquatic habitats. Of all locations on a natural or human-dominated landscape, river channels are probably the least stable in time, experiencing (and depending on) both gradual changes and episodic disturbance that structure their habitats and the organisms that utilize them. They also are subject to a spatial hierarchy of influences, not only those of the immediately adjacent riparian area itself (such as shade) but also those of the upstream watershed (delivering water and sediment to the channel) and the landscape even beyond its drainage boundaries. "Conditions far from stream banks affect the distribution of key instream habitat characteristics. Amount of instream wood, percentage of gravel, and pool frequency, which are essential to healthy salmon habitat, are particularly sensitive to land use" (O'Callaghan 2012:2). At even larger scales, the mobility of large terrestrial animals, the ability of salmon to return to headwater streams from the ocean, and the episodic disturbance from wildfire can exert equivalent (or greater) influences.

8.6. Conclusions

The perspective provided by landscape ecology emphasizes the temporally and spatially varying nature of habitats, and it suggests that achieving genuine habitat protection (and thus species conservation) is crippled by management that is limited to only narrow riparian corridors. To perpetuate fish and wildlife in the long term, three principles need to become integrated into the current paradigm for protecting aquatic ecosystems:

1. More important than simply protecting habitats is protecting the processes that create and sustain habitats. For this strategy to be successful, however, space in which that habitat can be expressed must also be protected. So, for example, instream and riparian area protection is indeed necessary, but it is not sufficient—the watershed and local-scale processes that create habitats within these areas must also be maintained. Current paradigms that focus on site-level management of riparian areas will not successfully support the dynamic processes that maintain diverse, productive fluvial ecosystems.

2. Habitats have not only spatial but also temporal dimensions to their creation and maintenance, and they cannot retain their functions if they remain static. The historical frequencies, durations, and magnitudes of natural disturbances (flood and fire being the most common) need to be better understood and then emulated to the greatest extent that surrounding land uses can tolerate.

3. Spatial connectivity between habitats is critical, particularly for species (such as salmon) with a variety of habitat requirements at different life stages. Isolated key habitats for mobile species are scant improvement over no habitat at all.

Integration of these principles into the management of aquatic systems will be challenging under existing regulatory frameworks. However, even an awareness of their relevance to sustaining healthy ecosystems may reveal opportunities for their application in regulatory and non-regulatory settings alike. The following key points are offered in support of such opportunities:



Decaying salmon carcass/Ned Pitmann, WDFW

8.6.1. Manage the Riverine Landscape

The riverine landscape is the proper construct for understanding and managing aquatic systems. Although riparian areas are disproportionately important for fish and wildlife relative to their area on a landscape, they are not exclusively important. Although riparian areas affect many critical instream conditions, including temperature, nutrient input, bank stability, and large wood, while also filtering sediment and other pollutants from adjacent upland areas, the watershed outside of the riparian area is no less influential on the ultimate state of instream conditions, particularly with respect to its control of hydrology and sediment delivery. From even beyond a watershed's boundaries, influences on the stream can be carried by wind, mobile biota, and wildfire.

8.6.2. Manage at Multiple Scales

Effective and efficient conservation of fish and wildlife habitats requires management at multiple spatial and temporal scales. Just as the influences on streams arise from within and beyond the riparian area, management must find vehicles to embrace these multiple spatial scales as well. Treatments must also embrace the ever-changing temporal patterns of stability and disturbance, which not only result in constantly shifting physical habitats but also create the ecological template necessary for healthy, resilient biological communities (Ryan and Calhoun 2010). This will require approaches that allow sufficient space and for the expression of key habitat-forming processes (Beechie et al. 2010) rather than simply the creation or protection of static habitat features.

8.6.3. Connect Individual Actions

Particularly in rivers, longitudinal connectivity of individual locations is a defining feature of these systems and their biota, and so maintaining this connectivity is an essential consideration of aquatic ecosystem protection. We increase our chances of maintaining connectivity with coordinated actions across all riparian sites, and even more so by considering the entire riverine landscape as the focus of conservation efforts. However, connectivity is only as strong as its weakest link, and so even a single ill-executed action can preclude achieving this goal altogether.

8.6.4. Engage the Challenge of Implementing Effective Management

Adhering to these key points for achieving genuine riparian ecosystem protection, particularly in the face of continued human impacts, may not be presently attainable. Even if specific beneficial actions are neither everywhere known nor universally feasible to implement, our current understanding can support a positive trajectory. "Landscape conditions far from the river's edge may have strong impacts on instream conditions. Understanding the effects of natural processes and human activities across entire drainage basins is key to researching, monitoring, and restoring aquatic resources." (O'Callaghan 2012:5). Progress will require not only an appreciation of the most effective riparian management strategies but also a broadened perspective on the scope of necessary actions, actions that must extend far beyond the river itself and its adjacent riparian ecosystem.

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Chapter 9. Science Synthesis to Management Implications

By: Timothy Quinn, Kirk L. Krueger, and George F. Wilhere

9.1. Introduction

This chapter summarizes important scientific findings from chapters 1 through 8 and provides a brief discussion of scientific themes that can inform thoughtful approaches to protecting or restoring riparian ecosystems and associated aquatic habitats. The current state of the science, as reviewed in chapters 1 through 8, clearly demonstrates the importance of an intact riparian ecosystem to the proper functioning of aquatic habitats. It also introduces new studies on conservation of watershed-scale processes that directly affect aquatic habitats and that help maximize the ecological benefits of riparian ecosystems.

Riparian ecosystems are a priority habitat because their composition, structure, and functions dramatically affect a multitude of fish, amphibian, reptile, bird, mammal, and invertebrate species (Cummins 1974; Richardson et al. 2005). Although riparian ecosystems are a small portion of the landscape, approximately 85% of Washington's wildlife species use them (Thomas et al. 1979). Protecting or restoring high function to this relatively small portion of the landscape can disproportionally benefit many species and other important ecosystem goods and services (e.g., clean water, fisheries, and flood control) (NRC 2002).

Our definition of riparian ecosystem is integral to the development of management recommendations. Riparian ecosystems are transitional areas (ecotones) between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota (NRC 2002). Riparian ecosystems include areas through which surface and subsurface hydrology connect waterbodies with uplands. They include those portions of terrestrial area that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence). Following Naiman and Bilby (1998), we include active floodplains and the terraces and adjacent uplands that contribute organic matter to active channels or active floodplains as part of the riparian ecosystem.

9.2. Summary of Chapters 2 Through 8

Chapters 2 through 8 discussed five key riparian ecosystem functions including bank stability, stream shading, wood recruitment, litter fall, and pollutant removal, as well as other topics related to the riparian ecosystems including stream channel morphology, nutrient dynamics, dryland riparian areas, and watershed-scale processes. Here we summarize the main points of each chapter.

9.2.1. Stream Channel Morphology (Chapter 2)

The stream morphology chapter explained how the composition, structure, and functions of riparian ecosystems and their associated aquatic habitats

depend on dynamic interactions of water, sediment, wood, and riparian vegetation. Important points from this chapter are:

- Erosion, transport, and deposition of sediment are part of a hierarchy of disturbance processes that continually create, maintain, destroy, and recreate the variety of aquatic habitats.

- Geomorphic processes related to the input of sediments to streams (from local stream bank erosion to mass wasting events) are integral to a watershed's natural disturbance regime and necessary for long-term ecological sustainability. For example, sediments delivered to streams from hillslope mass wasting events are often the predominant source of gravel, which is essential for salmon spawning habitat.

- Bank stability is one of five key ecological functions of riparian areas. Vegetation has mechanical and hydrologic effects on bank stability, and these effects can be stabilizing or destabilizing. However, in general, the net effect of vegetation is stabilizing.

- Simple models suggest that in an old-growth riparian forest, the full contribution of root strength to streambank stability is provided by trees within approximately 33 ft (10 m) of the streambank.

- Over a period of decades to centuries, a river or stream will travel across the entirety of its channel migration zone. Because the riparian ecosystem is defined by proximity to water, as the active channel moves back and forth across the channel migration zone, the riparian ecosystem moves with it.

9.2.2. Wood (Chapter 3)

Chapter 3 focused on the role of wood in aquatic ecosystems, and the recruitment of large wood to aquatic ecosystems. Wood plays a critical role in the composition, structure, and functions of riparian and aquatic ecosystems. In-stream large wood increases hydraulic complexity, i.e., creates a wider range of flow velocities, which causes pool formation, streambed scour, sediment deposition, and channel migration. The net result is a diversity of aquatic habitat types. Main points from the wood chapter include:

- The effects of wood on aquatic ecosystems in the Pacific Northwest are well-understood and ecologists are very confident about the critical role of wood in fish habitats.

- Ecologists are also confident about the role of riparian forests in supplying large wood to aquatic systems.

- Source distances for in-stream wood are a function of tree height in riparian ecosystems. Source distances are longer for riparian forests with taller trees.

- The main uncertainties for management are: the shape of the wood recruitment function, and in particular, the shape under different site-level and watershed conditions; and the potential contributions from recruitment mechanisms outside the riparian forest, such as landslides, debris flows, and extreme channel migration.

- In an unmanaged natural riparian area, 100% of a site's large wood recruitment potential comes from a distance of about 85 to 230 ft (26 to 70 m), depending on site productivity class. This does not account for additional wood recruitment through landslides, debris flows, or extreme channel migration.

9.2.3. Stream Temperature (Chapter 4)

The chapter on stream temperature presented a conceptual model for stream thermal regimes, discussed the effects of water temperature on fish, herpetofauna, and invertebrates; and reviewed the impacts of various land uses on stream thermal regimes. The chapter's key points include:

- Riparian vegetation can strongly affect stream thermal regimes (i.e., the spatial and temporal distribution of temperatures) which affects the survival and productivity of aquatic species. The importance of the thermal regime, not just summer peak temperatures, to aquatic species is increasingly acknowledged, but our ability to manage for suitable thermal regimes is limited.

- Fish and other aquatic organisms use different stream habitats, defined in part by specific water temperature ranges. However, the scientific literature is conclusive about the importance of cool stream temperatures (≤60°F [15.6°C]) for salmonid survival and productivity.

- Shade can substantially reduce the amount of direct solar radiation to the stream, which is one of the main sources of heating, especially in narrow low-order streams.

- Shade from riparian vegetation is affected by vegetation height, canopy density, and stem density. The width of a riparian area affects the amount of shading to the stream.

- A stream's thermal regime is also affected by latitude, elevation, aspect, topographic shading, channel bed shape, and water volume in addition to tributary, groundwater, and hyporheic flows.

- Structures such as large wood can reduce stream temperature by increasing pool depths, causing the development of undercut banks that provide shade, and by enhancing hyporheic exchange through redirecting surface flow to subsurface flow.

9.2.4. Pollution Removal (Chapter 5)

The pollutant removal function is unique in that it only exists in the presence of human activities that generate polluted water, and it is only necessary when nonpoint source runoff from upland activities threaten to degrade water quality. The pollution removal chapter covered the common sources, biological impacts, in situ chemistry, transport pathways, and results of removal efficacy studies for five types of pollutants—sediments, excess nutrients, metals, pesticides and other organic compounds, and pathogens. Key points from the pollution removal chapter include:

- There is overwhelming evidence in the scientific literature that riparian buffers[1] reduce nonpoint source water pollution for a variety of pollutants, and that riparian buffer width is the most important variable explaining removal efficacy.

- Research also indicates that the second most important variable in pollution removal is the vegetative composition and structure in riparian buffers.

[1] Riparian buffer refers to a strip of land adjacent to a stream that helps protect the stream from nonpoint source pollutants originating from upslope areas.

- Riparian buffer width recommendations depend on the particular pollutant to be removed and the desired removal efficacy. Policy makers must choose the desired removal efficacy.

- Models from four separate peer-reviewed meta-analyses show that riparian buffer widths for 95% removal efficacy of sediment range from 56 to 251 ft (17 to 76 m). Meta-analyses for other pollutants exhibit a similar degree of uncertainty with regard to riparian buffer width.

- Due to uncertainty regarding riparian buffer widths needed for a desired removal efficacy, management of riparian areas for the removal of pollutants should be monitored within an adaptive management program.

9.2.5. Nutrient Dynamics (Chapter 6)

The nutrient dynamics chapter explained the many effects of riparian areas on the three primary macro-nutrients: nitrogen, phosphorus, and carbon. Riparian areas can be nutrient sources or sinks, and riparian areas mediate the movements of nutrients between uplands and surface waters. Key points from the nutrient dynamics chapter include:

- Organic matter from riparian areas is an essential source of nutrients and chemical energy for aquatic ecosystems. Nutrients enter streams via plant litter fall or via surface and subsurface water flow.

- Streams in the Pacific Coastal Ecoregion of Washington (Naiman et al. 2000) are generally nutrient-poor and well shaded. Hence, additional nutrients (e.g., salmon carcasses) may enhance aquatic ecosystem productivity. However, aquatic communities may be adversely impacted by excessive anthropogenic nutrients such as nitrogen and phosphorus.

- One study suggests that riparian area widths needed to deliver 95% of annual litter input from mature conifer forests to streams ranges from 39–54% of mean tree height depending on a site's slope and wind exposure.

- Empirical evidence suggests increasing salmon carcasses, and their marine-derived nutrients and energy, to riparian ecosystems could contribute significantly to the recovery of imperiled salmon populations.

- More research is needed on the effects of riparian litter fall on stream productivity and on the relationship between salmon harvest escapement and salmon population productivity.

9.2.6. Riparian Areas of the Columbia Plateau (Chapter 7)

The chapter on riparian areas of the Columbia Plateau covered aspects of riparian ecology that are unique to this semi-arid to arid (i.e., dryland) ecoregion. The chapter clarified the definition of riparian ecosystem in dryland ecoregions, and reviewed the history of human impacts to riparian areas in the Columbia Plateau. It also reviewed the scientific literature on the five key riparian ecosystem functions – bank stability, stream shading, wood recruitment, litter fall, and pollutant removal – and it added a function of particular importance in the Columbia Plateau – alluvial water storage. Other important points include:

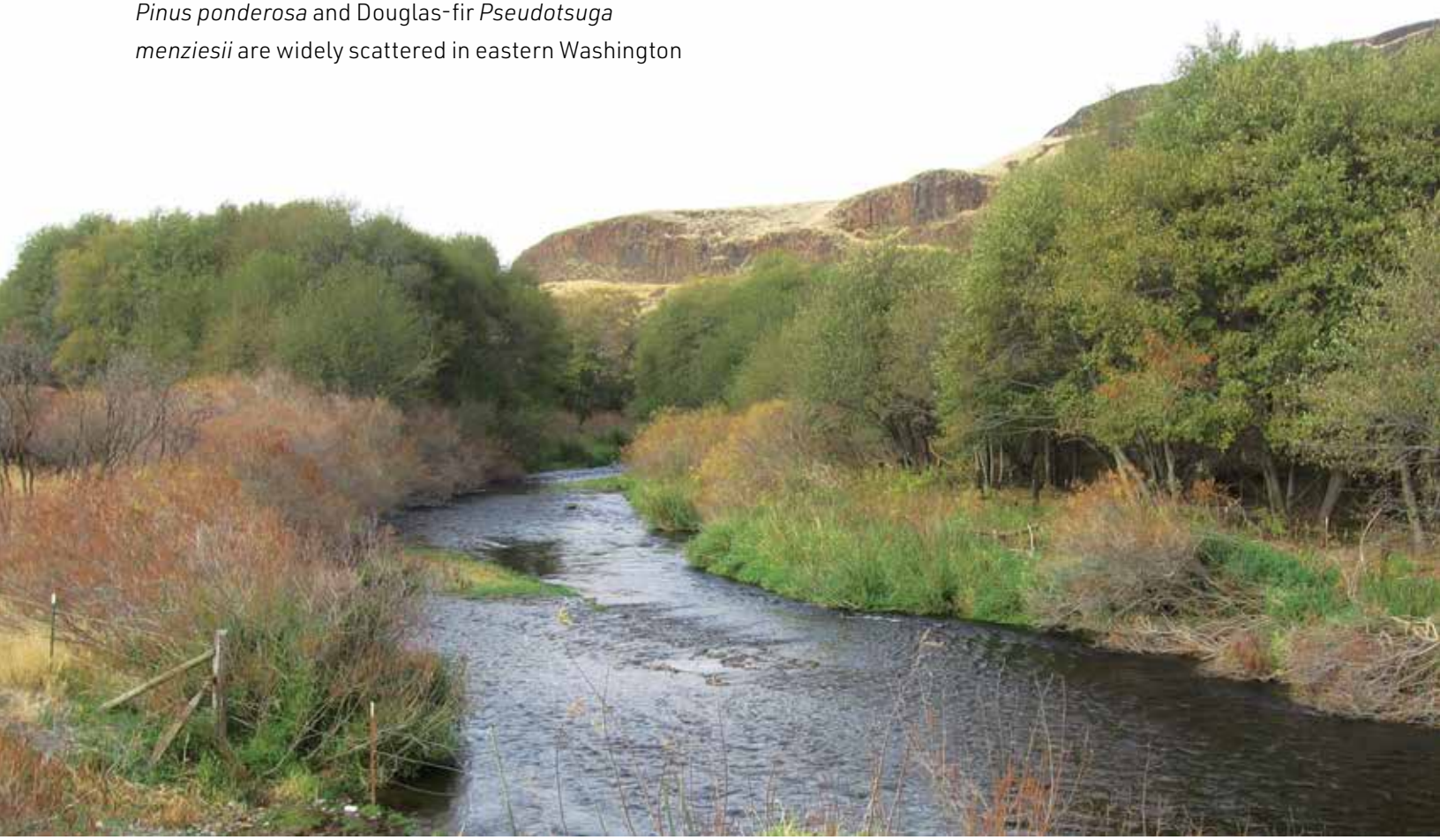
- Vegetation within riparian ecosystems of the Columbia Plateau often exhibits an abrupt demarcation between the riparian zone and the zone of influence. Phreatophytic trees and shrubs and hydrophytic herbaceous plants are confined to moist streamside areas, but the upland zone of influence may consist of sagebrush or bunchgrass communities.

- Nearly all riparian areas in the Columbia Plateau have been significantly impacted by human land use (grazing, intensive agriculture), resource exploitation (Beaver *Castor canadensis* trapping, timber harvest), water management (dams, diversions, reservoirs), or invasive plant species.

- Riparian areas in the Columbia Plateau are inhabited by a variety of deciduous woody plants, with the largest being Black Cottonwood *Populus trichocarpa* and White Alder *Alnus rhombifolia*. Pondersoa Pine *Pinus ponderosa* and Douglas-fir *Pseudotsuga menziesii* are widely scattered in eastern Washington riparian areas and were likely more common historically than at present. Compared to forested ecoregions, large woody debris play a much smaller role in fluvial processes.

- A rudimentary classification system based on overstory conveys obvious differences in stream shading provided by riparian areas: tall tree, short tree, tall shrub, shrub, grass-like, grass, and forb. The obvious implication of these vegetation types is that some stream channels in the Columbia Plateau receive little or no shade from vegetation, even historically. However, the actual historical condition of many riparian areas is unknown.

- Where the riparian zone is narrow (<100 ft [<30 m]) or the zone of influence lacks tall trees (<100 ft), the width of the riparian ecosystem is based on the pollutant removal function.



The Tucannon River flows generally northwest from headwaters in the Blue Mountains of southeastern Washington to the Snake River/Terra Hegy, WDFW

9.2.7. Watersheds (Chapter 8)

The chapter on watershed-scale processes looked beyond the site-level perspective at which riparian ecosystems are normally studied and managed. The chapter presented a conceptual framework that identified the key watershed processes and their primary influences on riparian ecosystems. The key points from the watersheds chapter are:

- Riparian ecosystems occupy perhaps the most dynamic and disturbance-prone area in a watershed. Nevertheless, the relative abundances of various aquatic habitat types in unmanaged, natural watersheds tends to remain constant over long periods (decades to centuries). In other words, at the watershed scale, habitat types appear to be in dynamic equilibrium.

- Riparian areas and surrounding watersheds are complex and dynamic systems comprised of many interacting components. These interactions across the watershed and through time create a mosaic of stream conditions necessary for self-sustaining populations of fish and other aquatic organisms.

- Some animal species have major impacts on the composition and structure of stream networks. Salmon, for example, restructure channel bed substrates during spawning and Beaver restructure the morphology and hydrology of floodplains. These "ecosystem engineers" are vital components of riparian ecosystems.

- Longitudinal, lateral, and vertical connectivity are critical for maintaining or restoring riparian ecological composition, structure, and functions. Studies have shown the importance of connectivity along the riparian corridor, but are often lacking specific guidance for management beyond "more is better."

- The composition, structure, and functions of riparian areas are affected by surrounding land uses (e.g., forestry, agriculture, residential).

- The effectiveness of riparian ecosystems to protect aquatic habitats can be circumvented by anthropogenic changes at the watershed scale. The routing of water from human development to streams via channelized flow, for example, can result in changes to the stream hydrograph, changes in channel morphology, reduced efficacy of the riparian pollutant removal function, and increases in fine sediment inputs to streams.

- More research is needed on practical ways to maintain or emulate natural disturbances in watersheds dominated by human land uses (e.g., agriculture, residential). This includes disturbances such as flooding and landslides that are essential for maintaining aquatic habitats.

9.3. Key Management Implications from Chapters 1 through 8

- Protection and restoration of riparian ecosystems continues to be critically important because: a) they are disproportionately important, relative to area, for aquatic species, e.g., salmon, and terrestrial wildlife, b) they provide ecosystem services such as water purification and fisheries (Naiman and Bilby 2001; NRC 2002; Richardson et al. 2012), and c) by interacting with watershed-scale processes, they contribute to the creation and maintenance of aquatic habitats.

- Stream riparian ecosystems encompass the riparian zone, the active floodplain including riverine wetlands, and the terraces and adjacent uplands that contribute matter and energy to the active channel or active floodplain (Gregory et al. 1991; Naiman and Bilby 1998).



Engineered large wood structure in the north fork of the Lewis River/ Chuck Stambaugh, WDFW

Such terraces and adjacent uplands are called the zone of influence.

- The width of the riparian ecosystem is estimated by one 200-year site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain. Protecting functions within at least one 200-year SPTH is a scientifically supported approach if the goal is to protect and maintain full function of the riparian ecosystem.

- Where the riparian zone is narrow (<100 ft [30 m]) and the zone of influence lacks tall trees (<100 ft), (e.g., in parts of the Columbia Plateau Ecoregion) the pollution removal function may determine the width of the zone of influence.

- The riparian ecosystem begins at the edge of the active channel or active floodplain, whichever is wider. As the active channel moves back and forth across the channel migration zone (CMZ), the riparian ecosystem moves with it. Consequently, there are times when the riparian ecosystem lies adjacent to and immediately outside the CMZ. Hence, to maintain riparian ecosystem functions, management must anticipate and protect future locations of the riparian ecosystems.

- A near consensus of scientific opinion holds that the most effective and reliable means of maintaining viable self-sustaining fish, especially salmon, is to maintain/restore ecosystems to conditions that resemble or emulate their historical range of natural variability (Swanson et al. 1994; Reeves et al. 1995; Bisson et al. 2009). This opinion is based in part on the complexity of processes that affect the expression of habitats over time and space.

- The protection and restoration of watershed-scale processes, especially related to hydrology, water quality, connectivity, and inputs of wood, shade, and sediment are important for aquatic system function, and help maximize the ecological benefits of riparian ecosystem protections.

- Riparian areas and surrounding watersheds are complex and dynamic systems comprised of many interacting components. Natural disturbances (floods, fire, and landslides) across the watershed and through time create the mosaic of conditions necessary for self-sustaining populations of fish, especially salmon, and other aquatic organisms.

- Impending changes to aquatic systems as a result of climate change increase risk to species already threatened by human activities. The effects of climate change on rivers and streams threaten to reduce fish distribution and viability throughout the Pacific Northwest (Beechie et al. 2013).

- The use of the precautionary principle and adaptive management are particularly appropriate when dealing with complex and dynamic systems, and when we have uncertainty related to exactly how management activities affect functioning of watersheds and riparian ecosystems.

9.4. Width of Riparian Ecosystems

The width of the riparian ecosystem is based on the zone of influence, and the zone of influence is based on riparian ecosystem functions (or processes) that affect aquatic habitats. FEMAT's (1993) curves are conceptual models describing how four key riparian ecosystem functions change with distance from the stream channel (Figure 9.1). The four functions are root strength (i.e., streambank stability), stream shading, litter fall (i.e., input of detrital nutrients), and coarse wood debris to

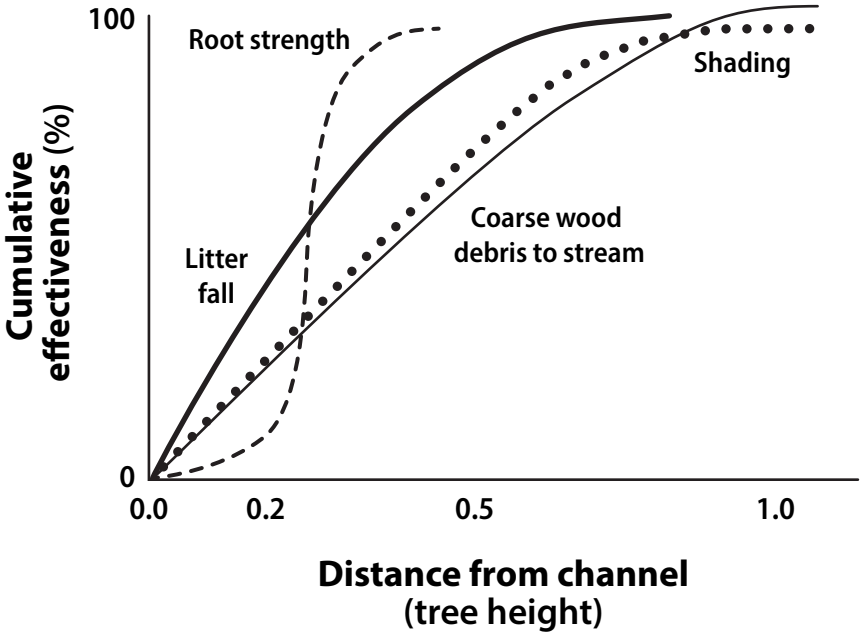


Figure 9.1. The "FEMAT Curves" (FEMAT 1993) are generalized conceptual models describing some riparian ecosystem functions and processes as the distance from a stream channel increases. "Tree height" in this figure is based on the average maximum height of the tallest dominant trees (200 years old or greater) and is referred to as site-potential tree height (SPTH).

stream (i.e., recruitment of large wood). FEMAT (1993) also included the pollution removal function (i.e., water quality) but did not create a curve for it. Originally, the curves were meant to convey two important points: 1) these four riparian ecosystem functions occur within one SPTH, and 2) the marginal return for each function decreases as distance from the stream channel increases. In other words, the FEMAT curves show that areas closer to the stream provide more of each function per unit width than areas farther from the stream.

The FEMAT curves are generalizations that ignore site-specific variability in riparian function among stream reaches. Nevertheless, FEMAT's conceptual models have influenced the width of riparian management zones (RMZs) in a number of important conservation plans such as the Forests and Fish Habitat Conservation Plan (DNR 2005).[2] Protecting natural vegetation within at least one SPTH is a scientifically supported approach if the goal is to protect and maintain ecological functions of riparian areas for the benefit of aquatic species. All else being equal, protecting areas narrower than one SPTH will result in lower levels of ecological function, and generally increase risk to fish and aquatic wildlife.

Although not all riparian functions are strongly associated with tree height (e.g., pollution removal), several key functions are, e.g., large wood recruitment, stream shading, and litter fall. Hence, the FEMAT curves use tree height of the dominant tree species to help estimate the amount of function provided by riparian areas of different widths. Consequently, the area within a site-potential tree height has often been used to define the extent of the "riparian ecosystem." However, FEMAT curves dealt strictly with functions strongly associated with vegetation and thus did not attempt to represent all aspects of the riparian ecosystem, such as other riparian functions or habitats for terrestrial species. For example, FEMAT curves did not explicitly address floodplains and riverine wetlands, sub-surface water movements, nutrient dynamics, pollutant removal, or groundwater recharge.

Given its utility, the height of site-potential trees has been described for a wide variety of tree species and can be readily found in the silvicultural literature. Fox (2003) found that mean heights of dominant trees in riparian old-growth forest of Washington range from 100 to 240 ft (30 to 70 m). The wide range of heights reflects differences in site productivity, i.e., local differences in soil nutrients and moisture, light and temperature regimes, and topography (Avery and Burkhart 1994: 278). Site productivity is described quantitatively through a site index, which is the average height that dominant trees of a particular species are expected to attain at a specified tree age. Tables (e.g., King 1966) have been developed to predict the future average height of dominant trees on a site.

FEMAT (1993:V-34) defined site-potential tree height as "the average maximum height of the tallest dominant trees (200 years or more) for a given site class." The key phrase in this definition is "200 years or more" which refers to the approximate minimum age of old-growth forests (Franklin and Spies 1991). This reflects FEMAT's underlying assumption that old-growth forest conditions are needed for full riparian ecosystem functions. Because Douglas-fir can continue height growth for more than 200 years (Herman and Lavender 1990), site-potential height based on age 200 years is the minimum width for full riparian ecosystem functions according to FEMAT. Moreover, in addition to changes in SPTH with increasing forest age, other riparian forest components (e.g., basal area of live trees, species composition, volume of dead woody material) continue to change after 200 years of age (Fox 2003) resulting in what may be important but relatively unstudied implications for riparian ecosystem functions and values.

[2] However, we note that the Forests and Fish Habitat Conservation Plan (FFHCP) did not adopt the FEMAT (1993) definition of site-potential tree height. The FFHCP defined SPTH as the height of dominant trees at age 100 years.



Quinault River/Wendy Cole, WDFW

9.5. The Condition of Riparian Ecosystems

Many scientific experts (Swanson et al. 1994; Reeves et al. 1995; Bisson et al. 2009) believe that the most likely way to realize viable self-sustaining fish, especially salmon, populations is to maintain/restore ecosystems to conditions that resemble their historical range of natural variability[3] (hereafter historical conditions). The scientific rationale for this opinion is that fish species have over many millennia adapted to particular disturbance regimes and consequent habitat conditions. Therefore, many scientists believe that dramatic deviation from historical conditions reduces the average survival and fecundity of animal populations, and thus puts species at risk of extinction (Swanson et al. 1994).

We define the historical conditions as the dynamic range of ecosystem composition, structure, and functions prior to significant impacts by Euro-American settlement (Swanson et al. 1994). Landres et al. (1999) suggest that the historical conditions provides guidance, context, and benchmarks for management. Understanding changes to historical conditions imposed by past management action (e.g., clearcutting riparian areas) can inform decisions on future management and realistic future objectives, such as desired future condition (DFC). Articulating riparian DFC with awareness of historical conditions provides a meaningful benchmark for assessing potential loss of riparian function and potential risks to fish and wildlife populations (Landres et al. 1999; Morgan et al. 1994). Because historical composition and structure were driven by disturbances, Landres et al. (1999) also suggest that managers should maintain, or at least emulate, the disturbance processes that created historical conditions. In other words, historical conditions describe relationships between species and habitats and thus provide context and guidance for managing ecological systems in the future. Emulating historical conditions could include the appropriate use of engineered solutions (e.g., stormwater basins to reduce peak flows, placing large wood in streams) to protect or restore habitats. Bisson et al. (2009) promote this same concept for conserving freshwater habitats of anadromous salmonids.

Managing a site, reach, or watershed to more closely resemble historical conditions may also effectively serve as a coarse-filter conservation strategy. Coarse filter strategies are based on the idea that managing for a habitat type, perhaps by emulating historical

[3] Also referred to as "historical natural variability," "natural variability," "range of natural variability," "natural range of variability," "historical range of variability," or "reference variability" (Landres et al. 1999).



Riparian ecosystem near Naches/Mary Huff, WDFW

conditions, will more efficiently conserve many species rather than managing for each species separately (Hunter et al. 1988; Swanson et al. 1994). Consistent with Landres et al. (1999), managing riparian areas with a goal of emulating historical conditions may be more cost effective in the long run than other approaches as it should require fewer investments in mitigation for degraded riparian ecosystem functions. In other words, managing for historical conditions is consistent with the idea that avoiding impacts to habitat is less expensive and more scientifically defensible than restoring habitat for each species after impacts.

Emulating an ecosystem's historical conditions poses both empirical and conceptual challenges. Empirical data needed to estimate the historical conditions are seldom available, and when available, the data are usually inadequate for the task of reliably estimating historical variation over time and space (Keane et al. 2009). The biggest conceptual challenge is posed by the ever-changing environment, much of it wrought by humans. While the historical conditions provides the best description of habitats that supported fish and wildlife species in the past, we recognize the challenge of applying that knowledge to watersheds that have been drastically altered by exotic species, fire suppression, intensive land uses, and climate change. Despite these challenges, Keane et al. (2009) still believe that the historical conditions provides an essential perspective for managers.

Historical conditions are the result of natural processes such as frequent floods, landslides, and wildfire – some of catastrophic magnitude – occurring throughout a watershed. Hence, for obvious reasons, managing riparian areas so that they roughly match their historical conditions may be unrealistic, especially in residential or agricultural settings. Furthermore, WDFW acknowledges that other uses of riparian areas as legitimate and worthwhile. Such uses and a wide variety of societal values must also be considered when developing strategies, plans, or rules for riparian areas. Therefore, rather than a goal, the historical conditions may better serve as a guide.

Dynamic mosaics of riparian and aquatic habitats are created, maintained, and altered in predictable (e.g., seasonally) and unpredictable ways (e.g., due to random events like storms, fires, and landslides).

9.6. Other Important Issues

We highlight three important issues that deserve more in-depth discussion: complexity, connectivity, and climate change. We also consider management implications of each issue for riparian areas and watersheds.

9.6.1 Complexity

The ecologist Frank Egler stated, "Ecosystems are not only more complex than we think, but more complex than we can think" (Egler 1977). Riparian ecosystems fit that description – they are dynamic, nonstationary, nonlinear systems comprised of many interacting components. In dynamic systems, conditions continually change over time. Dynamic equilibrium, for instance, means that conditions continually fluctuate about an average state, and the long-term statistics describing that process – mean, variance, fluctuation frequency – remain virtually constant. Nonstationary means that a system's functional relationships are changing over time, and consequently, the long-term statistics describing the process are changing. Some scientists believe that future climate change will lead to more pronounced nonstationarity in aquatic ecosystems (Milly et al. 2008). Nonlinear implies that functional relationships between ecosystem components are complicated. Under certain conditions, some types of nonlinear relationships may exhibit chaotic behavior. Not surprisingly, predicting the effects of management actions on dynamic, nonstationary, nonlinear systems is challenging.

Frissell et al. (1986) helped conceptualize watersheds as hierarchical systems where larger scale components, structures, and processes act primarily in the downstream direction on smaller scale components, structures, and processes. Factors that affect processes



The Nooksack River is located in the northwest part of Washington. It drains an area of the Cascade Range around Mount Baker, and flows through a fertile agricultural area before emptying into Bellingham Bay./Department of Natural Resources

over the longest duration can be considered "drivers" of the conditions and processes at lower levels in the hierarchy. Climate, geology, topography (and land cover) largely determine watershed characteristics and processes (paraphrasing the framework of Montgomery 1999). However, the composition, structure, and functions of streams and riparian ecosystems do not simply arise from these drivers. They are created and modified by continuous and episodic fluxes of materials (particularly water, sediment, and wood) and energy, which are broadly termed watershed processes. Dynamic mosaics of riparian and aquatic habitats are created, maintained, and altered in predictable (e.g., seasonally) and unpredictable ways (e.g., due to random events like storms, fires, and landslides).

These types of nonlinear dynamics are intrinsic properties of all ecosystems and important for the creation and maintenance of habitats that fish and wildlife populations depend on (Fausch et al. 2002; Ward et al. 2002; Wiens 2002), including salmon (Merz et al. 2015). The availability of multiple types of habitat (i.e., habitat heterogeneity) within and among streams may be essential for the persistence of multiple life history strategies in salmon species (Hilborn et al. 2003; Bisson et al. 2009; Waples et al. 2009; Merz et al. 2015) and the coexistence of other aquatic and riparian-dependent species (Bellmore et al. 2015).

The availability of multiple types of habitat within and among streams may be essential for the persistence of multiple life history strategies in salmon species and the coexistence of other aquatic and riparian-dependent species.

How should we approach the management of ecosystem complexity? Because ecosystems are wickedly complex (Ludwig 2001) and exhibit irreducible natural variability at multiple spatial and temporal scales, managers should adopt an attitude of humility. Over-confident managers who approach decisions with resolute certainty may fail to anticipate problems or recognize potential risks. Humility should instill in managers a desire to understand more before acting and a further desire to continually improve one's understanding of the system. The former is a quality of the precautionary principle, and the latter is a philosophical underpinning of adaptive management. Adaptive management is discussed later in this chapter.

9.6.2. Connectivity

Several chapters in this volume introduce the idea of watershed connectivity, in particular, longitudinal, lateral, and vertical connectivity. Connectivity is vital to aquatic ecosystem function and especially important at conferring resiliency to the negative effects of climate change (see section 9.6.3). Streams and their associated riparian ecosystems transport water, wood, sediment, nutrients, and organisms predominantly, but not exclusively in the downstream direction. Longitudinal (upstream to downstream) fragmentation of streams, for example by road crossings that block passage of fish, can reduce habitat capacity for individual species and change aquatic community composition by impeding movements of fish and other animals. Dams and undersized culverts also reduce the transport of large wood and sediment from upstream areas, which can adversely impact habitat composition and structure. Loss of lateral connectivity between streams and their floodplains due to levees, dams, or channel incision can reduce development of off-channel aquatic habitats, alter riparian plant communities, and impact processes such as water storage and nutrient cycling. Reduction of vertical connectivity, i.e., exchanges between stream water and deeper groundwater in the

hyporheic zone, can increase stream water temperatures, alter stream chemistry, and impact macroinvertebrate populations.

The importance of connectivity is also supported by our understanding of the extents at which aquatic species, especially fish, use stream habitat (Fausch et al. 2002). Movement of individuals among reaches and watersheds to locate specific habitat conditions (e.g., suitable water temperatures) is increasingly acknowledged as important to fish population persistence, particularly in light of climate change.



Bull trout in Deep Creek, Yakima County/Eric Anderson, WDFW

Maintaining connectivity in aquatic ecosystems likely requires management at site and watershed-scales. Management to protect or restore salmon and other aquatic species should ensure that all parts of a stream network that could be accessible to fish are in fact accessible to fish. That is, artificial structures should not impede fish movement. This requires watershed-scale stream network inventories and site-scale correction of artificial barriers. Additionally, barriers to the longitudinal or lateral transport of sediment and wood should be corrected, and hyporheic exchange should be enhanced by restoring the processes that supply in-stream large wood and coarse sediments. Where practical, management should ensure that the flows of water, sediment, and wood continue to flow as they did historically.

9.6.3. Climate Change

Climate change is expected to directly affect aquatic ecosystems by increasing air and water temperatures, altering stream hydrology, and impacting sediment yields throughout Washington. Indirect effects are too numerous to mention here but are likely to include changes to riparian plant communities, changes in fire regime, introduction of new diseases, exotic pests, and competitors with salmon. Because water temperature is widely recognized as one of the most important environmental factors influencing the geographic distribution, growth, and survival of fish (Regier et al. 1990; Armour 1991; McCullough 1999), the warming effects of climate change on rivers and streams threaten to reduce fish distribution and population viability (Beechie et al. 2013). The Pacific Northwest experienced a significant warming trend in summer stream temperatures of approximately 0.40°F/decade (0.22°C/decade) between 1980 and 2009 (Isaak et al. 2012). In the future, August stream temperatures are expected to increase an average of 5.1°F (2.8°C) by the 2080s (Isaak et al. 2015), and stream temperatures are expected to increase in all seasons of the year. The effects of climate change on surface water temperatures are compounded by other anthropogenic increases of water temperature caused by removal of riparian vegetation, water withdrawals, and channelization of streams (Poole and Berman 2001; Moore et al. 2005).

Climate change is projected to cause major changes in hydrology across Washington. Scientists have already detected negative trends in glacier volume and snowpack (Granshaw and Fountain 2006, Sitts et al. 2010, Stoelinga et al. 2010) and earlier peak streamflow in many rivers (Stewart et al. 2005). These trends are expected to continue in the future, along with increasing flood magnitudes, declining summer minimum flows, and rising stream temperatures (Elsner et al. 2010, Mantua et al. 2010). In Washington State, projected changes in future annual total precipitation are generally small compared to year-to-year fluctuations in seasonal and annual rainfall. Nonetheless, hydrological projections for the mid to late 21st century show a shift in flood frequencies that results in larger peak flows at all recurrence intervals , e.g., 2-year, 5-year, 10 year, etc. in some watersheds (Salathè et al. 2014). Changes are projected to be most pronounced in middle elevation basins, where a substantial proportion of the basin is located near the snowline (i.e., the "mixed rain and snow" zone). In these watersheds, warming will cause more precipitation to fall as rain instead of snow, which will decrease snow accumulation, hasten melt, and increase runoff (Hamlet et al. 2007).

Changes in stream flow are expected to alter sediment transport and channel morphology, however, published research analyzing the potential impact of future climate change on fluvial processes is limited. Praskievicz (2015) modeled the effects of future climate on geomorphic responses in three snow-dominated river basins of Idaho and eastern Washington. The results from the first site on the Tucannon River indicate that net sediment deposition is likely to occur, with increasing mid-channel bars. The second study site on the Coeur d'Alene River projects net erosion, and results for the third site forecast minimal changes on the Red River. These varying results indicate that the impacts of climate on sediment movement also depend on local context, i.e., how reach traits, such as substrate size or riparian vegetation, affect a stream channel's morphological stability or lateral mobility.

Management to minimize direct detrimental effects of climate change on aquatic habitat includes: 1) increasing shade to streams by protecting or restoring riparian forests, 2) decreasing thermal sensitivity of surface waters by increasing summer low flows, 3) maintaining longitudinal, lateral, and vertical connectivity within watersheds, 4) monitoring and mitigating stream temperatures, especially when management actions are known to cause stream temperature increases, and 5) developing contingency plans for responding to climate related changes to water temperature, hydrology, or channel morphology. Because riparian areas can provide longitudinal habitat connectivity, link aquatic and terrestrial ecosystems, and create thermal refugia for wildlife, climate change makes the restoration of riparian areas especially important (Seavy et al. 2009).

9.7. Uncertainty and Management

Chapters 2 through 8 demonstrate that management of riparian ecosystems often involves substantial and unavoidable uncertainty, despite the fact that many riparian ecosystem functions are well understood. We include a discussion on uncertainty in management because effective use of scientific knowledge requires an understanding of its uncertainty (Fischhoff and Davis 2014) and because addressing uncertainty can lead to better long-term outcomes (Steel et al. 2009) for all stakeholders.

Some uncertainty is due to limited knowledge. For instance, the historical composition and structure of native riparian vegetation in the Columbia Plateau remains relatively unknown (see Chapter 7). Research can improve knowledge and reduce this type of uncertainty. A less well-appreciated type of uncertainty is associated with stochastic environmental variability, which introduces irreducible uncertainty or "unavoidable unpredictability" (sensu Spielgelhalter and

Riesch 2011) into the expected effects of management decisions. In other words, the longer one's time horizon for management decisions, the more likely that less expected, or even unexpected effects are going to occur. This type of uncertainty can be quantified through research, but never reduced. For example, large floods may unexpectedly alter channel form (e.g., widen a channel) and as a result change a stream's thermal regime. This in turn can decrease the effectiveness of management aimed at maintaining stream temperature based on pre-flood riparian conditions (see Chapter 4). This concept is important because conditions created by some land management actions are ubiquitous and long-lived (e.g., young forests after timber harvest), thus creating a situation where less expected effects due to environmental variability are virtually guaranteed.

Using stream temperatures to discuss uncertainty is instructive because our understanding of riparian effects on stream temperatures is arguably the best developed of any riparian function (see Chapter 4). We know for instance how certain ecosystem composition, structures, and functions (predictor variables) affect stream temperatures, so we could accurately predict the effects of common management actions with high certainty. Unfortunately, logistical or economic constraints of collecting predictor variable data usually preclude the development and use of such models. Instead, we often employ simpler, statistical models or correlations to inform management. For instance, we can generally predict changes to water temperatures based on changes to shade from riparian vegetation because changes in shade are often strongly correlated with changes in water temperatures (Cristea and Janisch 2007).

Figure 9.2 shows the results of several studies relating changes in summer stream temperatures to changes in riparian buffer width. Stream temperatures were measured before and after reducing the widths of forested riparian buffers, which decreased shading of streams. The results of such studies are often assumed to predict the effects of shade reduction on stream temperatures in other locations. However, because each stream is unique (e.g., differences in stream widths, topographic shade, groundwater flows, etc.), changes in water temperature based solely on shade are relatively uncertain. For example, Jackson et al. (2001) found that 30-ft wide forested buffers caused summer stream temperatures to increase by an average of 4.2°F (2.4°C), but the 95% confidence interval for the average was -0.1° to 8.6°F (0.0 to 4.8°C). At one site, temperatures decreased, likely due to unmeasured effects on groundwater flow (Janisch et al. 2012). Such uncertainty is common. Additional studies of this type might narrow confidence intervals and more accurately estimate the average response, but predictions of stream temperature based on buffer width alone will remain highly uncertain despite our knowledge that shade can strongly affect water temperature.

Similarly, empirical data describe wood recruitment from riparian areas as increasing with distance from the channel (i.e., riparian area width), but this relation varies widely among streams (Figure 9.3). Other potential predictor variables might include the wood recruitment mechanism, topography, fire regime, and forest age. However, we are unaware of other recruitment models that include variables that would allow us to predict the effects of management actions on wood recruitment with high certainty.

Currently, most riparian ecosystem functions described in this volume are best described with statistical models or correlations that often reliably predict the direction or sign (+ or -) of the correlation and some of the variability around the central tendency. Many such models rely on data from few sites that poorly describe the average or range of relations. For example, sample sizes for studies in Figure 9.2 are small, i.e., $N = 6, 3, 5,$ and 5. Additional studies with larger sample sizes could better describe responses to shade reduction but are unlikely to substantially reduce uncertainty if they do not consider other important predictors in addition to buffer width.

Even as we conduct studies that reduce uncertainty associated with a lack of knowledge, we are continually challenged to make sound decisions into the future by irreducible uncertainty due to stochastic events, such as natural disturbances, and non-stationary processes like climate change. As riparian ecosystems change through time, whether due to future wildfire, floods, or climate change, we must ensure that our management strategies meet their intended goals. Uncertainty about the future effects of current management actions is perhaps the biggest challenge faced by managers because those effects of management often persist over long periods or may be practically irreversible (e.g., loss of riparian areas due to residential development). With this uncertainty comes the risk that the unpredictable may convert current and successful regulatory policies or management practices into future failures.

We can never eliminate uncertainty, but we can make management decisions that are appropriate given our current level of uncertainty. We recommend reducing risk to riparian ecosystems by: 1) reducing uncertainty through new research, 2) explicitly acknowledging and directly addressing uncertainty in policy and management decisions that affect fish and wildlife habitats, 3) considering the application of the precautionary principle to reduce unacceptable risk (O'Riordan and Jordan 1995; Gullet 1997). That is, erring on the side of caution, particularly when dealing with environmental impacts that are difficult to undo (irreversible damage or long recovery times), and 4) practicing adaptive management.

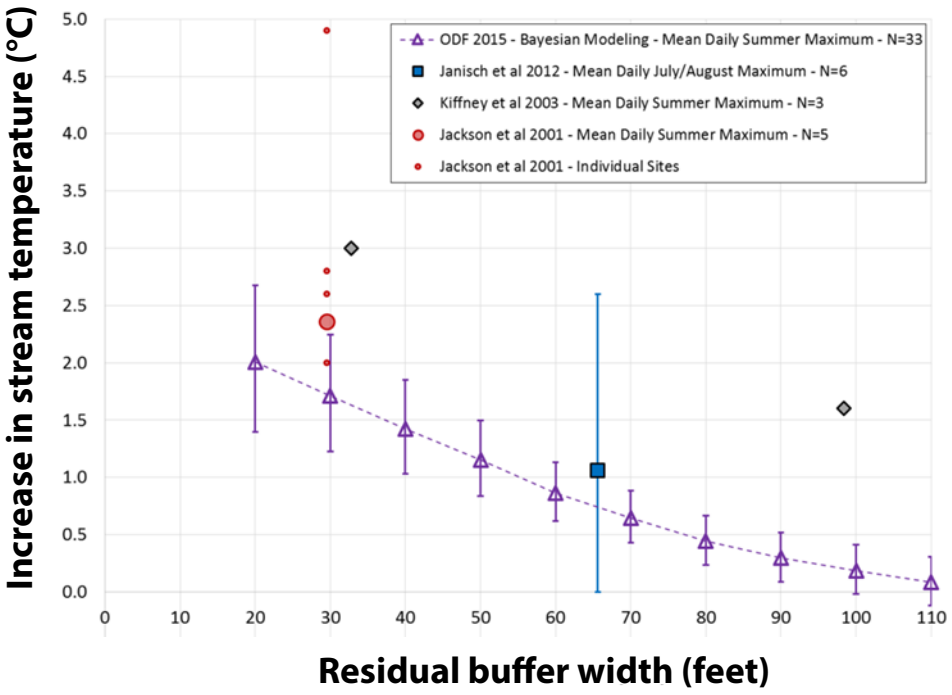


Figure 9.2. Observed temperature response associated with "no-cut" riparian buffers with adjacent clearcut harvest. Only studies that employed a Before-After-Control-Impact design and conducted in Pacific Northwest forests are included. Bayesian modeling results (and 90% credible intervals) were derived from data collected as part of Groom et al. (2011). A change of 1°C is equivalent to a 1.8°F change. Analyses provided by P. Leinenbach, USEPA Region 10 (See Chapter 4 for a more complete description of this figure).

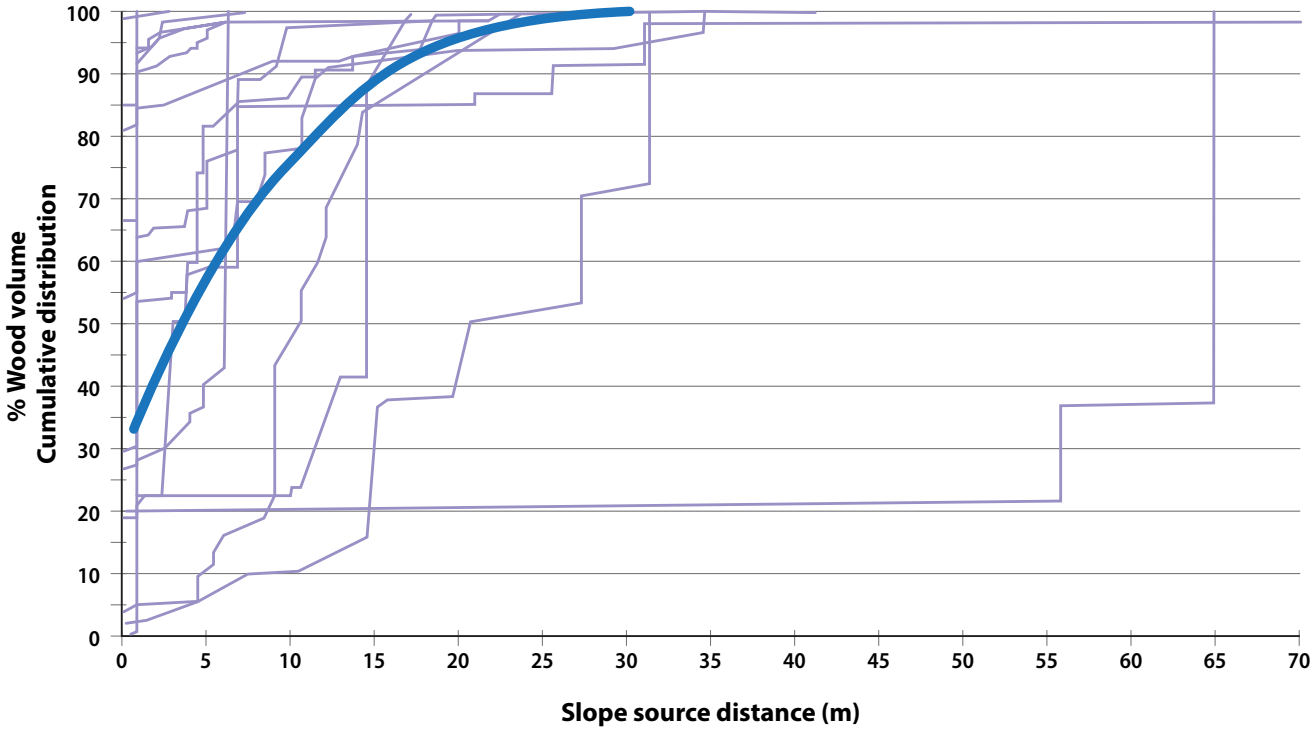


Figure 9.3. Sixteen large wood recruitment curves for second-growth redwood forest on 16 sites in northern California (from Benda et al. 2002). The theoretical prediction curve (thick line) is based on mortality recruitment only using random 360° fall trajectories. Curves to the left of the theoretical curve are sites where bank erosion is a major recruitment mechanism. Curves to the right of the theoretical curve are sites where landsliding is a major recruitment mechanism. (See Chapter 3 for a more complete description of this figure).

9.8. Adaptive Management

Despite new insights into ecosystems dynamics and better understanding of the effects of management actions on species and their habitats, natural resource management decisions will always struggle with some level of uncertainty. Adaptive management is widely recognized as a sensible, if not essential, approach to the management of natural resources under uncertainty. As originally conceived, adaptive management can be defined as the systematic acquisition and application of reliable information to improve management over time (Wilhere 2002). Reliable information is acquired through statistically-valid research and monitoring. Furthermore, adaptive management can facilitate a way forward when levels of uncertainty become high enough to threaten stakeholder agreement about environmental policies (Wilhere and Quinn 2018).

The adaptive management process is a continual cycle consisting of planning, action, monitoring, evaluation, and adjustment (Bormann et al. 1994, Wilhere 2002) (Figure 9.4). Monitoring and evaluation form a feedback loop that provides information for management decisions. However, feedback alone cannot fulfill the goal of adaptive management, that is, the continual improvement of management. Ideally, an "adaptive management plan" integrates every phase of management with monitoring, and considers how information collected through monitoring will lead to future changes in management. Developing an adaptive management plan should be a collective endeavor of policy makers, managers, field staff, and scientists.

Successful adaptive management requires an understanding of all stakeholder perspectives. Hence, developing an adaptive management plan should begin with discussions amongst stakeholders about their concerns regarding uncertainty and risk. The plan should be developed through a negotiated process, and it should explain how specific risks will be addressed through a program of systematic learning (e.g., management experiments, focused monitoring, targeted literature reviews, etc.). Importantly, the best adaptive management plans have agreements about the specific information necessary to change policy or management and what those changes might be.

Adaptive management programs can fall victim to the widespread confusion between the roles of values and science in management decisions (Wilhere and Quinn 2018). Maintaining a clear distinction between values (cultural, social, and economic) and science, and between the roles of policy makers and scientists, is critical to success. That said, WDFW recognizes that natural resource management or land use policies must often balance competing ecological, economic, and social values. In fact, one of WDFW's conservation principles is that management decisions should integrate ecological, economic, and social perspectives. This volume addresses only the ecology of riparian area management; it does not cover economic and social aspects. Determining an acceptable balance requires a political process involving stakeholders, local governments, tribes, and state agencies. We hope this volume can help to inform that process.

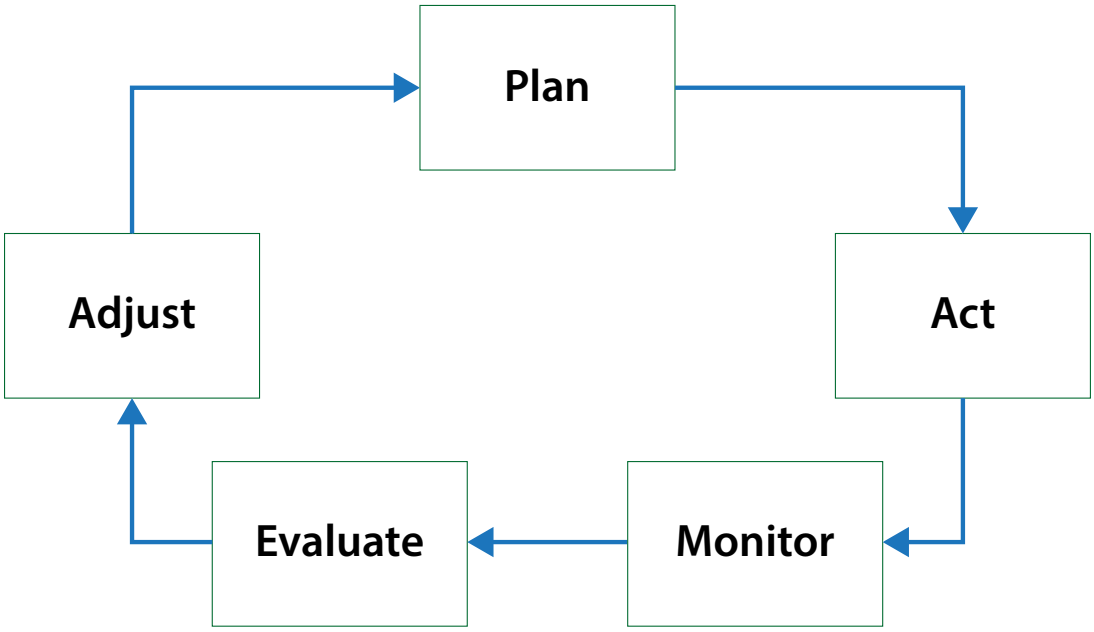


Figure 9.4. The adaptive management cycle (modified from Bormann et al. 1994).

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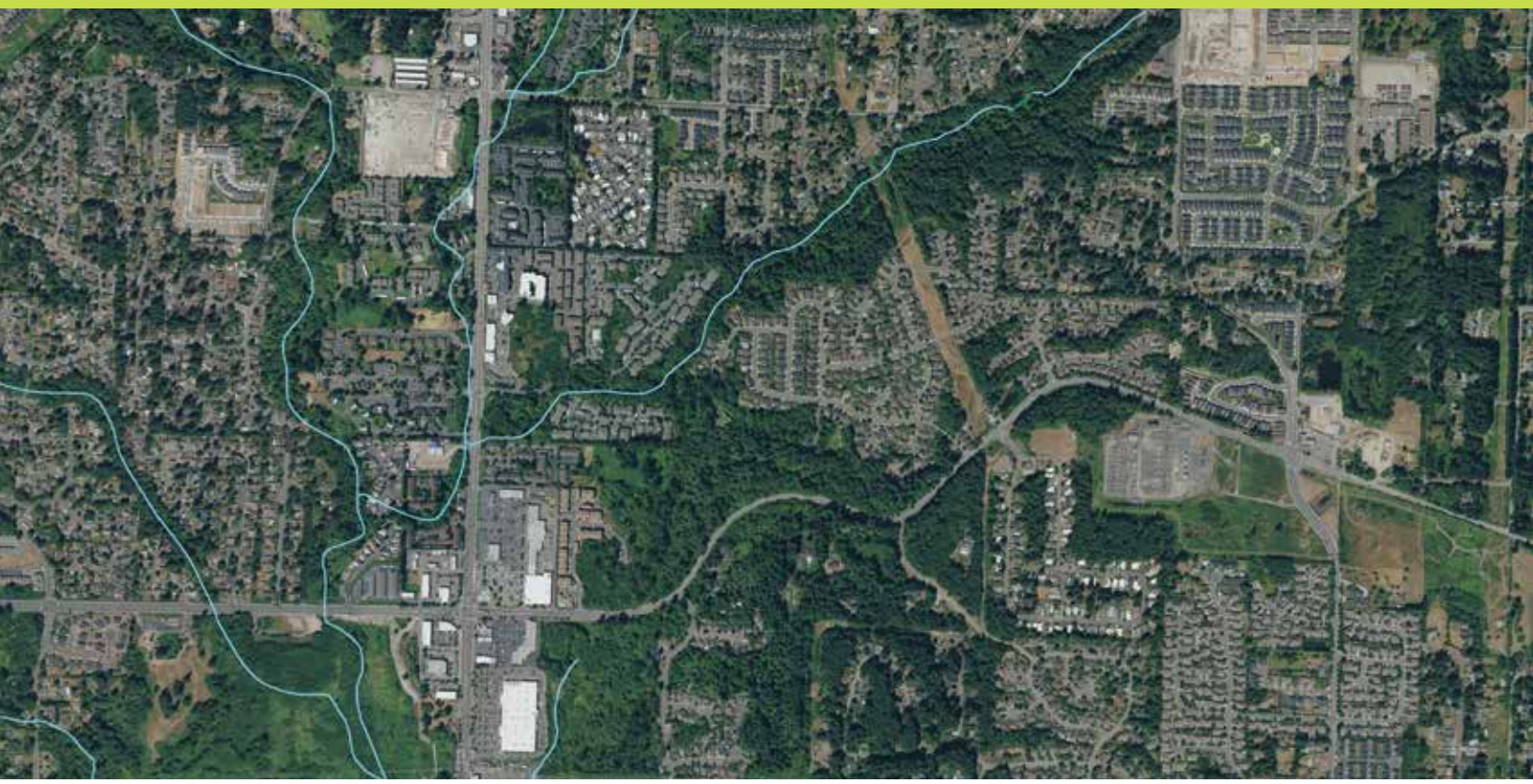
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Grande Ronde River/Alan Bauer

Appendix 1: Glossary



Riparian areas along streams (blue lines) in north King County/Terry Johnson, WDFW

Active channel

The portion of a stream channel defined by the lower limit of continuous riparian vegetation, and it may be delineated by absence of both moss on rocks and rooted vegetation. The upper most elevation of the active channel is sometimes equated with the ordinary high water mark.

Active floodplain

A portion of floodplain that is located between the active channel and adjacent terrace or hillslopes. Depending on the watershed, the flood return interval of the active floodplain varies between 1 and 10 years.

Adaptive management

The systematic acquisition and application of reliable information to improve management over time. Ideally, adaptive management treats management decisions as experiments in order to address critical uncertainties and learn more quickly from experience. It involves setting targets, monitoring outcomes, and adjusting management decisions based on results. Hallmarks of a well conceived adaptive management program include: 1) adequate funding for research, 2) a willingness to change course when pre-established triggers are reached, and 3) a commitment to monitor and evaluate conditions at appropriate spatial and temporal scales. See Ecosystem-based management.

Anthropogenic

Caused by human activity.

Channel confinement

A description of how much a channel can laterally move within its valley determined by the ratio of valley width (distance between toe of hillslopes on both sides of a

valley) to active channel width. Typically, a segment is considered confined when the ratio is less than two and unconfined when greater than four.

Channel migration zone
The area within which a river channel is likely to move laterally over a specified period (e.g., 100 years).

Channel morphology
A stream channel's shape, which changes over time due to the interplay of water, sediments, vegetation, and certain animals, e.g., Beaver *Castor canadensis* and salmon.

Channel reach (stream)
A continuous segment of a channel that has similar physical features, such as gradient and confinement.

Channel slope or gradient
The average steepness of a stream segment measured as its change in elevation divided by its length. Typically, a segment's gradient is considered low if less than 2%, moderate between 2% and 4%, and high if greater than 4%.

Composition: See *Ecological composition*.

Disturbance regime
The frequency, magnitude, and duration of disturbance events.

Disturbance
A disturbance is any relatively discrete event in time that disrupts the composition, structure, or functions of ecosystems, communities, or populations.

Dynamic equilibrium
An ecological system's long-term state of relative stability that is maintained through opposing processes. Understanding an ecosystem's equilibrium, is a goal of ecosystem-based management.

Ecological (biological) integrity
Capacity of an ecological system to maintain a community of organisms that has species composition, diversity, and functional organization comparable to those of natural habitats within a region. An ecological system has integrity when its dominant ecological characteristics (e.g., composition, structure, function) occur within their historical ranges of natural variation.

Ecological composition
A term encompassing all parts of an ecosystem that include both living (biotic) and nonliving (abiotic) parts. Ecosystem composition is an important consideration in conservation.

Ecological function(ing)
1) The process or cause-effect relationships between two or more interacting ecosystem components; 2) the sum of processes that sustain the system; or 3) the capacity of natural processes to provide goods and services that satisfy human needs, either directly or indirectly.

Ecological process
Interactions among components of an ecosystem, both biotic (living organisms) and abiotic (chemical and physical) components. Many processes involve the transfer, conversion, or storage of matter and energy. This term is synonymous with the first definition of *ecological function.*

Ecological structure
The arrangement of and relations among the parts or components of an ecosystem.

Ecosystem
A spatially explicit unit of the Earth that includes all of the organisms, along with all components of the abiotic environment. Ecosystems have *composition, structure,* and *functions.*

Ecosystem-based management (EBM)
An integrated management approach that recognizes the full array of interactions within an ecosystem, including humans, rather than considering single issues, species, or ecosystem services in isolation. EBM often involves balancing ecological, economic, and social trade-offs within the context of existing laws and policies.

Erosion
The loosening and transport of soil particles and other sediment by water. Terrestrial erosion includes raindrop splash erosion, overland flow sheet erosion, surface flow rill (shallow) and gully (deeper) erosion. Channel erosion includes streambank erosion and channel incision. Rill and gully erosion diminishes the capacity of riparian areas to trap sediment and pollutants and often can be avoided with intact riparian vegetation.

FEMAT curve
A conceptual model that describes the relationship between various riparian *ecosystem functions* and distance from channel. The model consists of generalized curves that show the cumulative effectiveness of litter fall, root strength, shading, and coarse wood debris recruitment to stream as a function of distance from channel.

Flow regime
The distribution of stream discharges through space and time. Flow regimes can be described by their magnitude (e.g., mean annual, hourly maximum), timing, frequency or return periodicity, duration, spatial distribution, and rate of change. The pathways that water takes to reach a stream (e.g., surface runoff) exert a strong influence on the flow regime.

Function
Physical, chemical, or biological processes that occur within an ecosystem. See *ecological function(ing)* and *ecological process.*

Historical conditions: See *Range of natural variability.*

Hot moments
Periods of elevated denitrification rates. Hot moments can occur during a rainfall event. Also see *hot spots.*

Hot spots
Areas that exhibit high denitrification rates. Hot spots often occur in floodplains and other riparian areas with oscillating groundwater levels and/or higher hyporheic flows. Locations of hot spots can vary through time.

Hydrology
Study of the occurrence, distribution, movement, and properties of the water and their relationship with land.

Hyporheic zone
The area beneath the bed of a river or stream that is saturated with water.

Impervious surface
Ground surfaces that resist or prevent water infiltration, e.g., roofs of houses and roadways.

Incision
The process of downcutting into a stream channel leading to a decrease in the channel bed elevation. Incision is often caused by a decrease in sediment supply or an increase in stream flows capable of transporting (scouring) sediment.

Infiltration
The rate or process by which water on the ground surface enters the soil.

Macroinvertebrates
Animals, including insects, mollusks, crustaceans, and worms, that do not have a backbone, and are large enough to be seen without a microscope. Aquatic macroinvertebrates are commonly used as an indicator of habitat and water quality.

Mass wasting
The down slope movement of soil, sediments, and rock due to gravity (rather than water, wind, or ice, for example).

Nutrient cycling
The movement, uptake, transformation, storage, and release of nutrients, especially carbon, nitrogen, and phosphorus. Riparian characteristics that affect nutrient cycling include flow path, vegetation composition and structure, topography, groundwater level, and soil type.

Nutrient spiraling length
The distance nutrients move downstream during a complete cycle; a measure of nutrient utilization to nutrient supply. Long spiraling lengths indicate that the system is saturated with nutrients and organisms can no longer use the incoming nutrient loads. Streams in Washington forests typically have relatively short nutrient spiraling lengths.

Ordinary high water mark
This mark occurs along stream channels where the presence and action of waters are so common and usual, and so long continued in all ordinary years, as to mark upon the soil a character distinct from that of the abutting upland.

Precautionary principle
Erring on the side of causing no negative impact to natural resources when faced with uncertainty, especially for harm that is essentially irreversible. The precautionary approach involves: 1) taking preventive action (avoiding impacts), 2) shifting the burden of proof to the project proponents, 3) exploring a wide range of potential alternatives, and/or, 4) including multiple stakeholders and disciplines in decision making.

Process: See *Ecological process.*

Range of natural variability (or historical range of natural variability)
Refers to the range of ecological conditions (composition, structure, and functions) in a time period before widespread anthropogenic changes.

Riparian
An adjective meaning adjacent to a water body: stream, river, lake, pond, bay, sea, ocean. Riparian areas are sometimes referred to by different names: riparian ecosystems, riparian habitats, riparian corridors, or riparian zones. Depending on the context, these different terms may have somewhat different meanings.

Riparian buffer
Buffer refers to its purpose, which is to reduce or prevent adverse impacts to water quality, fisheries, and aquatic biodiversity from human activities occurring upslope of the buffer. Riparian buffers may also be called a riparian management zone. Riparian buffers managed specifically for pollutant removal may also be called a vegetated filter strip.

Riparian ecosystem
Riparian ecosystems are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence). Our definition of riparian ecosystem does not include adjacent waters (i.e., river or streams, but does include riverine wetlands) and recognizes the riparian zone as a distinctive area within riparian ecosystems.

Riparian management zone
Riparian management zone is often synonymous with riparian buffer. See *Riparian buffer.*

Riparian zone
A distinctive area within riparian ecosystems. The riparian zone contains wet or moist soils and plants adapted to growing conditions associated with periodically saturated soils.

Riverscape
A landscape organized around a river system that includes the river network and contributing watershed along with other components that are not organized by watershed boundaries such as wildfire, mobile organisms, and wind-borne seeds. Distinct from uplands, it is primarily organized in a downstream direction (e.g., movement of water, sediment, and wood) but also contains lateral elements (e.g., floodplain interaction), vertical elements (e.g., interaction of surface and hyporheic flow), and upstream elements (e.g., migrating salmon).

Salmonid
A family of fish comprised of salmon, trout, and whitefish. Native salmonid species in Washington State include: Chinook Salmon *Oncorhynchus tshawytscha,* Chum Salmon *O. keta,* Coho Salmon *O. kisutch,* Pink Salmon *O. gorbuscha,* Sockeye Salmon/Kokanee *O. nerka*, Steelhead/Rainbow Trout *O. mykiss,* Cutthroat Trout *O. clarki,* Bull Trout *Salvelinus confluentus,* Dolly Varden *Salvelinus malma,* Pygmy Whitefish *Prosopium coulteri,* and Mountain Whitefish *P. williamsoni.* This list does not include names of subspecies.

Site class
The classification of a site's productivity based on the growth of the dominant tree species. Site classes vary based on local differences in soil nutrients and moisture, light and temperature regimes, and topography. Site classes are typically described as most productive (I) through least productive (V).

Site-potential tree height
The average maximum height of the tallest dominant trees for a given age and site class.

Stochastic process
An event involving chance or probability (e.g., landslide, flood). Stochastic processes may have patterns that can be analyzed statistically but cannot be precisely predicted.

Stream order
A hierarchical stream classification system in which headwater tributaries are classified as first order; when two first order tributaries meet they form a second order tributary, when two second order tributaries meet they form a third order tributary, and so on. Low order (1st-3rd) streams make up ~88% of the state's stream miles. Below its confluence with the Snake and Yakima rivers, the Columbia River is a 10th order river.

Structure: See *Ecological structure*.

Thermal loading potential
The potential amount of solar radiation (sunlight) available at a given location. Primary factors include shading (topographic and vegetative), latitude, elevation, and date.

Thermal regime (stream)
The distribution of stream temperatures through space and time. Thermal regimes can be described by their magnitude (e.g., monthly mean, hourly maximum), timing, frequency, duration, spatial distribution, and rate of change.

Thermal sensitivity (stream reach)
The susceptibility of a stream reach to changes in temperature. Thermal sensitivity typically increases with less stream flow, less groundwater input, and a wider channel to depth ratio.

Uncertainty (scientific)
The absence of information about something. Sources of uncertainty include, but are not limited to: natural variation (i.e., because ecosystems vary in unpredictable ways through time and space), model

uncertainty (e.g., we do not understand a process), systematic error (e.g., poorly designed experiments), or measurement error.

Vegetative filter strips

A riparian buffer designed to capture nutrients, contaminant compounds, and sediment transported by run-off. Filter strips are sometimes synonymous with riparian buffers.

Water quality

Physical, chemical, and biological characteristics of water that describe its suitability to meet human needs or habitat requirements for fish and wildlife.

Watershed processes

The fluxes of energy (e.g., chemical, sunlight, wildfire) and materials (particularly water and sediment) that interact with biota (e.g., vegetation, salmon, Beavers, soil microbes) to form a watershed's physical features and characteristics, which give rise to its instream physical and ecological conditions. These processes occur within a context that reflects the watershed's climate, geology, topography, and existing human land use. Also see *Ecosystem process*.

Watershed

An area of land that drains to a common waterbody.

Wood recruitment

The process of wood moving from a riparian area to the stream channel. Sources of recruitment include bank erosion, windthrow, landslides, debris flows, snow avalanches, ice storms, Beaver, and tree mortality due to fire, insects, or disease.



Northwestern salamander/WDFW

Appendix 2: Categorization of Information Sources

Legal Requirement: RCW 34.05.271

The Revised Code of Washington (RCW) 34.05.271 requires the Washington Department of Fish and Wildlife (WDFW) to categorize sources of information used to inform technical documents that directly support implementation of a state rule or statute. Because WDFW Priority Habitat and Species documents—such as this one—are referenced in regulations for the Growth Management Act [e.g., WAC 365-190-130(4)] and Shoreline Management Act [e.g., WAC 173-26-221(5)(b)], we classify all references in the literature cited sections of Volume 1 into the following RCW 34.05.271 categories:

(i) Independent peer review: Review is overseen by an independent third party;
(ii) Internal peer review: Review by staff internal to the department of fish and wildlife;
(iii) External peer review: Review by persons that are external to and selected by the department of fish and wildlife;
(iv) Open review: Documented open public review process that is not limited to invited organizations or individuals;
(v) Legal and policy document: Documents related to the legal framework for the significant agency action including but not limited to:
(A) Federal and state statutes;
(B) Court and hearings board decisions;
(C) Federal and state administrative rules and regulations; and
(D) Policy and regulatory documents adopted by local governments;
(vi) Data from primary research, monitoring activities, or other sources, but that has not been incorporated as part of documents reviewed under the processes described in (i), (ii), (iii), and (iv) of this subsection;
(vii) Records of the best professional judgment of department of fish and wildlife employees or other individuals; or
(viii) Other: Sources of information that do not fit into categories i - vii.

Meeting the Intent of RCW 34.05.271

Assigning references to categories requires judgement where methods of peer-review are not clearly defined. We assigned all scientific journal articles, science related books by independent science book publishers, universities, the National Research Council (NRC), and the National Academy of Engineering; symposia volumes sponsored by professional organizations (e.g., American Fisheries Society); and graduate theses and dissertations to category i –*independent peer review.* Government agency documents including those published by the Fish and Wildlife Service (USFWS), Environmental Protection Agency (EPA), Geologic Survey (USGS), Forest Service (USFS), and the Canadian Wildlife Service were assigned to category *viii*. Others references were assigned as described above.



Headwater wetland that flows north to Stavis Creek and south to Tahuya River/Keith Folkerts, WDFW













Washington Department of FISH and WILDLIFE

Riparian Ecosystems, Volume 2: Management Recommendations



A Priority Habitats and Species Document of the Washington Department of Fish and Wildlife

Washington Department of FISH and WILDLIFE

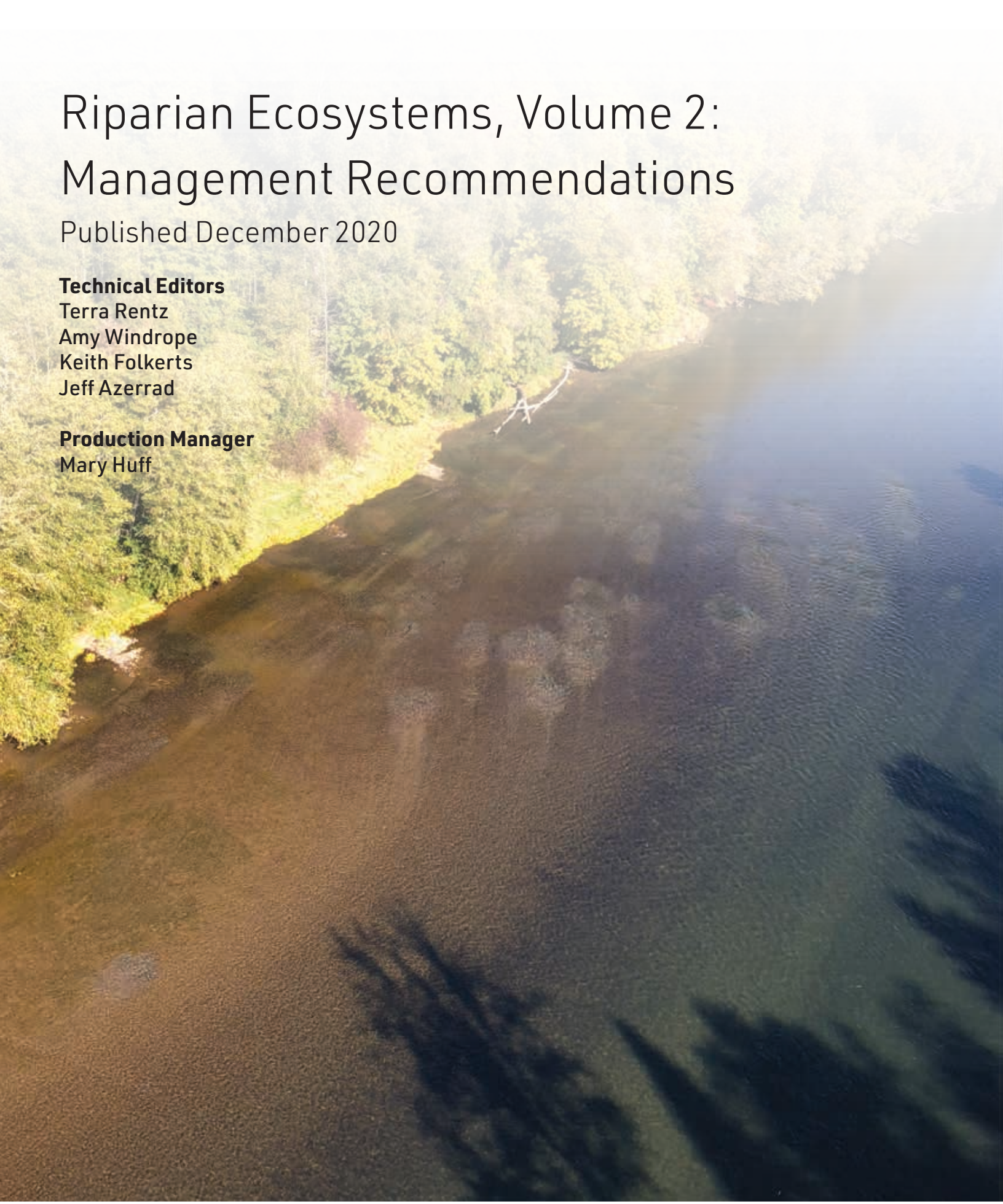
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Salmon redds along the Cowlitz River, Lewis County/George Fornes, WDFW

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Federal (EPA and NOAA Fisheries) and tribal entities (individual tribes, the Northwest Indian Fisheries Commission, Columbia River Inter-Tribal Fish Commission, and Upper Columbia United Tribes) as well as numerous state agencies (Washington State departments of Ecology, Natural Resources, and Commerce; Recreation and Conservation Office; Washington State Conservation Commission; and Puget Sound Partnership) reviewed draft versions of this document. During the summer 2018 public comment period, local governments and members of the public provided valuable feedback that led to a more concise and user-friendly final version of Volume 2.

Within WDFW, Keith Folkerts led coordination, contract planning and budgeting for this work. Tim Quinn and George Wilhere were integral in ensuring a strong relationship with information in Volume 1 and provided additional valuable feedback on multiple drafts. Terry Johnson developed the Site-Potential Tree Height mapping tool and wrote the associated user guide information in the Appendix to this Volume 2. Alison Hart produced final graphics and ensured consistent formatting and stylistic usage throughout. Mary Huff provided editorial support, improved the document's organization, and (in late 2020) took it across the finish line.

WDFW recognizes and appreciates the significant role that tribes, local governments, conservation organizations, and others play in accomplishing our agency's mission. Indeed, we are certain that without these concerted efforts to designate and protect the riparian ecosystems that are essential for most of the state's fish and wildlife species, WDFW would be unable to fulfill its mandate on behalf of all of Washington's residents.

While we acknowledge and have deep appreciation for all the review and comments provided, WDFW bears sole responsibility for this document and any errors contained herein.

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This document is available in alternative formats upon request. Please contact WDFW's ADA Program Manager at 360-902-2349, TTY (711), or ADAProgram@dfw.wa.gov.

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Acronyms for Volume 2

CAO	Critical Areas Ordinance
CMZ	Channel Migration Zone
CREP	Conservation Reserve Enhancement Program
DFC	Desired Future Condition
DNR	Department of Natural Resources (Washington State)
EBM	Ecosystem Based Management
EPA	Environmental Protection Agency (U.S.)
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FEMAT	Forest Ecosystem Management Assessment Team
FPA	Forest Practices Act
FWHCA	Fish and Wildlife Habitat Conservation Area
GIS	Geographic Information System
GMA	Growth Management Act
HMP	Habitat Management Plan
HRCD	High Resolution Change Detection
LID	Low Impact Development
NHD	National Hydrography Dataset
NOAA	National Oceanographic and Atmospheric Administration
NRCS	Natural Resources Conservation Service
OHWM	Ordinary High-Water Mark
OSS	On-site Sewage Systems
PHS	Priority Habitats and Species
RCO	Recreation and Conservation Office (Washington State)
RCW	Revised Code of Washington
RMZ	Riparian Management Zone
RZ	Riparian Zone
SMA	Shoreline Management Act
SMP	Shoreline Master Program
SPTH	Site-Potential Tree Height
$SPTH_{200}$	Site-Potential Tree Height (at age 200 years)
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service



Watershed lesson/Brittany Gordon, WDFW

UWCIG	University of Washington Climate Impacts Group
VSP	Voluntary Stewardship Program
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WFPB	Washington Forest Practices Board
WRIA	Water Resource Inventory Area
WSCC	Washington State Conservation Commission
WWRP	Washington Wildlife and Recreation Program

Chapter 1. Overview

1.1. Our Role as Washington's Conservation Agency

The mission of the Washington Department of Fish and Wildlife (WDFW) is to preserve, protect, and perpetuate the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. We offer the following science-based guidance to further that mission through the preservation, protection, and–where possible–restoration of healthy, intact, and fully functioning riparian ecosystems statewide. As described throughout this volume, we believe that protection *and* restoration[1] of Washington's riparian ecosystems is a foundational conservation action; considering a growing population and changing climate, it is also an urgent one.

Within the State of Washington's land use decision-making framework, WDFW's role is that of advisor. We provide information relative to our mission about the habitat needs of fish and wildlife, and the likely implications of various land use decisions on those resources over time. Through the Priority Habitats and Species (PHS) Program, we work cooperatively with land use decision makers and landowners to facilitate solutions that accommodate their needs and the needs of fish and wildlife. We provide this PHS document, *Riparian Ecosystems Volume 2: Management Recommendations* in support of that effort.

Priority Habitats are places that warrant special consideration for protection when land use decisions are made and should also be prioritized for restoration or enhancement wherever possible. To qualify as a "Priority Habitat" in WDFW's PHS program, an ecosystem or habitat component must provide unique or significant value to many species. Specifically, it must have one or more of the following attributes (WDFW 2008):

- Comparatively high fish and wildlife density
- Comparatively high fish and wildlife species diversity
- Important fish or wildlife breeding habitat
- Important fish or wildlife seasonal ranges
- Important fish or wildlife movement corridors
- Limited availability
- High vulnerability to habitat alteration
- Unique or dependent species

Riparian areas (comprised of riparian ecosystems, active floodplains, and riverine wetlands) meet all these criteria, and were among the first Priority Habitats described by WDFW. Riparian areas provide important ecological functions that help create and maintain aquatic habitats in addition to supporting terrestrial wildlife. Riparian areas alongside

[1] Restoration of riparian ecosystems is critically important because legacy of environmental impacts resulting from the ways land use has affected riparian areas over the past 200 years. In other words, what remains available for protection is not enough to provide the full functions and values Washington's fish and wildlife need.



Hundreds of fish and widlife species, like this female Wood Duck, depend on or use the state's riparian areas. This includes over 150 species of birds, mammals, amphibians, reptiles, and invertebrates designated as Species of Greatest Conservation Need in the 2015 State Wildlife Action Plan./Jeanne Hannah

rivers and streams are the focus of this document, however much of the science reviewed in Volume 1 and the recommendations in this Volume 2 are relevant for lakes, ponds, and marine shorelines as well.

As previously mentioned, one role of WDFW in land use decision making is that of advisor. In that role, recommendations like those contained in this document and in complementary PHS documents (available at https://wdfw.wa.gov/species-habitats/at-risk/phs/recommendations) provide critical information for the protection (and where necessary, recovery) of Washington's fish and wildlife. We recognize landowners and land managers most often face situations where various human needs must also be met; and thus, considerations other than fish and wildlife will be incorporated into land use decision making.

The information presented in this management recommendation document is not, in and of itself, science. Rather, it consists of policy recommendations which are informed by the best available science

WDFW's Mission

To preserve, protect, and perpetuate Washington's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

WDFW'S Riparian Values

We value the protection and restoration of healthy, intact, and fully functioning riparian ecosystems statewide.

WDFW'S Recommendation

Within the context of wise watershed management, preserve, protect, and–where possible–restore the full extent of riparian ecosystems.

Ecosystem Based Management & WDFW's Conservation Principles

In 2013, WDFW adopted ecosystem-based management principles into policy (WDFW Policy 5004). Ecosystem-based management is an integrated, science-based approach to natural resource management that aims to sustain the ability of ecosystems to provide goods and services upon which humans and other species depend. Importantly, ecosystem-based management recognizes the magnitude of humans as change agents in the ecosystem, and the role of social, economic, and ecological factors in managing complex and dynamic systems.

We believe that conservation is best achieved through employing the following ecosystem-based management principles:

1. **We practice conservation by managing, protecting, and restoring ecosystems for the long-term benefit of people, and for fish wildlife and their habitats.**

2. **We work across disciplines to solve problems because of their connections among organisms, species and habitats.**

3. **We integrate ecological, social, economic, and institutional perspectives into our decision-making.**

4. **We embrace new knowledge and apply best science to address changing conditions through adaptive management.**

5. **We collaborate with our co-managers and conservation and community partners to help us achieve our shared goals.**

summarized in Volume 1[2] and which reflect WDFW's mission and legislative mandate. To that end, these recommendations represent WDFW's guidance for the protection and restoration of healthy, intact, and fully functioning riparian ecosystems and for how land managers and land use regulators can utilize best available science to protect these ecosystems within the scope of their authority and/or ability.

For example, local governments are encouraged to use information provided through PHS to guide critical area ordinance (CAO) updates and other land use policies, plans, or regulations. More specifically, WDFW advises using the information in this PHS Riparian Volume 2 for designating riparian areas as Fish and Wildlife Habitat Conservation Areas (FWHCAs) and protecting them for their inherent value, rather than just as buffers for rivers and streams. This is because riparian areas are so important for helping sustain endangered, threatened, and sensitive species; providing habitat connectivity for both aquatic and terrestrial wildlife; and for their critical role in protecting salmonid habitat (WAC 365-190-130).

In short, Volumes 1 and 2 focus on the science and management, respectively, of riparian ecosystems to support fish and aquatic wildlife species. Volume 1 characterizes riparian ecosystem functions and essential processes, while Volume 2 provides management guidance for riparian ecosystems in the context of watershed processes. To be clear, these two volumes do not provide a summary of science or recommendations regarding the contribution of riparian ecosystems for the protection of terrestrial wildlife species. However, our first generation PHS Riparian-specific document, *Management Recommendations for Washington's Priority Habitats: Riparian* (Knutson and Naef 1997) does provide terrestrial species information related to riparian areas. Further, PHS has separate, species-specific management recommendations that address the needs of many terrestrial Priority Species.

This document provides recommendations applicable across the State of Washington but does not address unusual, site-scale environmental conditions or issues specific to particular ecological communities. We strongly encourage addressing such matters at a local level with the assistance of WDFW regional habitat biologists, and other technical experts and stakeholders such as tribal biologists and conservation organizations.

2 The original manuscript of *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* was publicly released in May 2018. In 2020, the format of the document was professionally designed, which included making limited updates to content focused on copyediting and improving usability. In accordance with standard citation practice, Volume 1 is now cited as having a 2020 publication date, but substantively, the current document is equivalent to the original 2018 version.

1.2. Purpose and Applicability of Volume 2

The purpose of this document is to provide guidance to protect and–where possible–restore healthy, intact, and fully functioning riparian ecosystems, which are fundamental for clean water, healthy salmon populations, and climate resilient watersheds.

Volume 2 provides information to:

- Protect existing and restore degraded riparian ecosystem functions in support of aquatic and terrestrial species recovery;
- Assist local governments with their responsibilities to protect priority fish and wildlife and their habitats;
- Assist landowners and local groups in implementing voluntary restoration actions on and off working lands; and
- Incorporate monitoring and adaptive management to understand how well regulatory and non-regulatory efforts are protecting riparian functions and values.

This guidance is applicable to riparian ecosystems statewide. We offer a specific focus on lands within the purview of the Growth Management Act (GMA) and Shoreline Management Act (SMA), although a broader application by local governments and other users is also appropriate.

While many other federal, state, and tribal government programs and policies pertain to riparian ecosystems, they are not specifically addressed in this document. For instance, we do not discuss holistic protection of floodplains, nor do we discuss specific Endangered Species Act (ESA) requirements relative to listed salmonids and other species. Also, we do not address commercial forestlands that fall under the jurisdiction of the Forest Practices Act (FPA), or the Department of Ecology's clean water regulations. These other programs and policies were developed with specific goals and objectives that may be different from the goals of this document, and as such may differ with guidance provided herein.

1.3. Science Synthesis and Management Implications (Volume 1) Summary

As stated above, Volume 1 (Quinn et al. 2020; see footnote 2) provides important information integral to the development of these management recommendations. It includes both overarching as well as specific considerations important to all efforts, large and small, to protect rivers and streams for the benefit of the aquatic species associated with them. Volume 1 focuses on the science of riparian ecosystems–specifically, how riparian areas interact with large-scale drivers (e.g., topography, geology, climate, and land use) and watershed processes to create and maintain riparian and aquatic habitat in support of fish and wildlife. Thus, we provide here an explicit definition of riparian ecosystems from Volume 1 that combines a variety of conceptual riparian descriptions from the scientific literature:

> Riparian ecosystems are transitional between terrestrial and aquatic ecosystems, distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface




Many adult flying insects, such as the blue damselfly (above, left) spend their larval stage as freshwater macroinvertebrates. During this early period, some of those species, like the stonefly nymph (above, right) help fallen leaf litter to decompose by shredding it while feeding. At both life stages, these animals provide important food for fish and other aquatic and terrestrial widlife./Jim Cummins and Taylor Cotten, WDFW

hydrology connect waterbodies with adjacent uplands. They include those portions of terrestrial ecosystems (i.e., *a zone of influence*) that significantly influence exchanges of energy and matter with aquatic ecosystems and the portion of the ecosystem characterized by moist soils and plants adapted to periodically saturated soils – the *riparian zone* (RZ). The width of the riparian ecosystem is typically defined by the outer edge of the zone of influence, which, in forested regions, is based on site-potential tree height (SPTH) measured from the edge of the active channel. While our definition of riparian ecosystem does not include the water in river or streams, it does include riverine wetlands and recognizes the riparian zone as a distinctive area within riparian ecosystems.

To assist managers in understanding important implications of the science synthesized in Volume 1, we reiterate the ten overarching findings of that document below. These findings are also discussed in more detail in later chapters.

1. Protection and restoration of riparian ecosystems continues to be critically important because: (a) they are disproportionately important, relative to area, for aquatic species (e.g., salmon) and terrestrial wildlife; (b) they provide ecosystem services such as water purification and fisheries (Naiman and Bilby 2001, NRC 2002, Richardson et al. 2005); and (c) by interacting with watershed-scale processes, they contribute to the creation and maintenance of aquatic habitats.

2. Stream riparian ecosystems encompass the riparian zone; the active floodplain, including riverine wetlands and the terraces; and adjacent uplands that contribute matter and energy to the active channel or active floodplain (Gregory et al. 1991, Naiman and Bilby 1998). Such terraces and adjacent uplands are called the zone of influence.

3. The width of the riparian ecosystem is estimated by one 200-year SPTH measured from the edge of the active channel or active floodplain. Protecting functions within at least one 200-year SPTH is a scientifically supported approach if the goal is to protect and maintain full function of the riparian ecosystem.

4. Where the riparian zone is narrow (<100 ft [30 m]) and the zone of influence lacks tall trees (<100 ft), (e.g., in parts of the Columbia Plateau Ecoregion), the pollution removal function may determine the width of the zone of influence.

5. The riparian ecosystem begins at the edge of the active channel or active floodplain, whichever is wider. As the active channel moves back and forth across the channel migration zone (CMZ), the riparian ecosystem moves with it. Consequently, there are times when the riparian ecosystem lies adjacent to or overlaps the CMZ (see Figure 2.3). Hence, to maintain riparian ecosystem functions, management must anticipate and protect future locations of the riparian ecosystem.

6. A near consensus of scientific opinion holds that the most effective and reliable means of maintaining viable self-sustaining fish, especially salmon, and wildlife populations is to maintain/restore ecosystems to conditions that resemble or emulate their historical range of natural variability (Swanson et al. 1994, Reeves et al. 1995, Bisson et al. 2009). This opinion is based in part on the complexity of processes that affect the expression of habitats over time and space.

7. The protection and restoration of watershed-scale processes, especially related to hydrology, water quality, connectivity, and inputs of wood, shade, and sediment are important for aquatic system function, and help maximize the ecological benefits of riparian ecosystem protections.

8. Riparian areas and surrounding watersheds are complex and dynamic systems comprised of many interacting components. Natural disturbances (flood, fire, and landslides) across the watershed and through time create the mosaic of conditions necessary for self-sustaining populations of fish, especially salmon, and other aquatic organisms.

9. Impending changes to aquatic systems as a result of climate change increase risk to species already threatened by human activities. The effects of climate change on rivers and streams threaten to reduce fish distribution and viability throughout the Pacific Northwest (Beechie et al. 2013).

10. The use of the precautionary principle and adaptive management are particularly appropriate when dealing with complex and dynamic systems, and when we have uncertainty related to exactly how management activities affect functioning of watersheds and riparian ecosystems.

1.4. Key Findings and Recommendations

WDFW recognizes that there is a significant amount of work currently being done throughout the state to protect and restore riparian areas. This focus is longstanding and has ranged from regulatory protections that guide Washington's growing population to voluntary conservation on our working lands. Below, we highlight what we believe—based on best available science and our agency's mission—are the most important recommendations to ensure healthy, intact, and fully functioning riparian ecosystems that provide for the preservation, protection and perpetuation of Washington's fish and wildlife:



A tributary stream (lower left of photo) contributes sediment to a side channel of the Stillaguamish River as precipitation levels rise in autumn. Snohomish County/Mary Huff, WDFW

1. **Designate riparian ecosystems as critical areas:** WDFW recognizes riparian ecosystems as a Priority Habitat for fish and wildlife and recommends that local jurisdictions designate those ecosystems as Fish and Wildlife Habitat Conservation Areas (FWHCAs), a type of critical area. We define the bounds of the riparian ecosystem as the riparian management zone (RMZ), and this RMZ should be designated as the location where protection and restoration of riparian ecosystem functions and values are addressed. RMZs provide a framework for delineating, evaluating, planning, and managing functions and values. In this volume, we provide a process for RMZ delineation (Chapter 2).

2. **Include watershed–scale management considerations:** Watershed-scale management is critical to realizing the full benefits of riparian ecosystem protection and restoration. Certain types of anthropogenic changes at the watershed scale can dramatically reduce the effectiveness of riparian ecosystems to protect aquatic habitat. For example, unmitigated delivery of stormwater from impervious surfaces like roads, parking lots, and rooftops to streams, for example, dramatically increases peak stream flows, alters channel form, and short-circuits the capacity of riparian areas to remove pollutants from runoff. Similarly, road-crossing culverts that are impassible to fish can reduce stream-network connectivity and dramatically reduce amounts of otherwise suitable habitat.

3. **Use reference points to locate the inner edge of the RMZ:**

    - For streams without Channel Migration Zones (CMZs), the inner edge of the RMZ should be delineated starting at theouter edge of active floodplain, if this has or can be determined; otherwise, from the active channel, as delineated by the Ordinary High-Water Mark (OHWM)[3].

    - For streams with CMZs, the unpredictable nature of channel migration should be accommodated through delineation of an RMZ that encompasses both the entire CMZ and future locations of the riparian ecosystem. In these instances, the inner edge of the RMZ should be located at the outer edge of the CMZ.

Whether or not a stream has a CMZ, the distance from the inner edge of the RMZ to the outer edge of the RMZ should be one $SPTH_{200}$.

4. **Include CMZs in delineation of the RMZ:** CMZs are important to protect for maintaining riparian functions and values, and so are included in the delineation of RMZs. Over time, a riparian ecosystem will occupy different parts of the CMZ and uplands outside the CMZ. Lateral channel migration and related streambank erosion processes can pose risks to homes and communities located near rivers; however, when channels are constrained from moving, aquatic and riparian ecosystems may degrade over time. To maintain riparian ecosystem functions, land managers must anticipate and protect future locations of the riparian ecosystem and thus delineate the RMZ accordingly.

5. **Establish RMZ widths based on site-specific conditions:** From the perspective of those riparian ecosystem functions affecting aquatic systems, the width of the riparian ecosystem varies with ecological conditions. The most efficient way to protect riparian functions is to adopt protections that recognize these differences, rather than uniform-width (i.e., one-size-fits-all) RMZs, as these may result in over-protection in some places and under-protection in others.

3 Active floodplain delineations are rarely available, and we currently lack a repeatable, well-vetted, and widely accepted method for the delineation of active floodplains. Therefore, until such a process is developed, we recommend delineating the RMZ's inner edge using the OHWM for streams without CMZs.



Dryland ecoregion riparian area, Whitman County/Michael Townsend



Forested ecoregion riparian area, Chelan County/George Wilhere, WDFW

a. **In forested ecoregions, start with SPTH$_{200}$**: At most riparian areas in forested ecoregions, SPTH$_{200}$ is 100 feet or greater, and so the RMZ is delineated using one SPTH$_{200}$. If SPTH$_{200}$ is less than 100 feet, the RMZ is delineated by the pollution removal function (see below).In highly altered areas where soil data are not available, it may be necessary to estimate SPTH$_{200}$ values based on nearby soils.

b. **In dryland ecoregions, start with SPTH$_{200}$** (if available), or the width of the riparian vegetation community: If site conditions do not support tree species or SPTH$_{200}$ is less than 100 feet, then RMZ width is determined by the full extent of all riparian vegetation (the riparian zone) or by the pollution removal function–see below.

c. **For both forested and dryland ecoregions, use the pollution removal function when appropriate:** Where the SPTH$_{200}$ and/or the width of the riparian vegetative community is less than 100 feet, we recommend that RMZ width be delineated at a minimum of 100 feet, as this provides the width necessary for 95% pollution removal target for most pollutants (approximately 85% for surface nitrogen.)[4]

To aid with site-specific RMZ delineation, WDFW created an internet-based mapping tool that reports recommended widths for RMZs (Appendix 1) statewide based on SPTH$_{200}$. The tool also notes instances where a 100-foot RMZ should be applied to support the pollution removal function.

6. **Apply the recommended RMZ delineation steps to all streams, whether or not they are fish-bearing:** In 1997, WDFW recommended a lower level of protection for non-fish bearing streams than fish-bearing streams. In reviewing the current science literature for Volume 1, we found no evidence that full riparian ecosystem functions

[4] See Chapter 2, Section 2.3.5 for more information about surface nitrogen removal and other site-specific characteristics that may require RMZ distances greater than 100 feet in order to ensure an adequate pollution removal function.



Deer tracks and fallen leaves near Scatter Creek, Thurston County/Janet Anthony, WDFW

along non-fish-bearing streams are less important to aquatic ecosystems than full riparian ecosystem functions along fish-bearing streams. This recommendation is based on four additional considerations. Non-fish-bearing streams:

- Support a unique community of aquatic and riparian-obligate wildlife;
- Provide movement corridors for wildlife, particularly in the face of changing climate conditions;
- Provision fish-bearing streams with matter and energy; and
- Provide cool water to downstream reaches. Washington State has already experienced increased stream
- temperatures due to climate change and expect further increases, which have direct implications for the persistence of fish.

7. **Establish monitoring and adaptive management frameworks:** We believe it is critical to understand if riparian ecosystems protections are working as intended, and if not, to adjust them accordingly. We recommend the establishment of monitoring and adaptive management designed to improve (where necessary) local permit implementation and compliance, and to increase effectiveness of actions intended to protect aquatic species.

8. **Consider needs of relevant terrestrial species:** As stated earlier, a review of new literature related to the needs of terrestrial Priority Species was not a focus of Volume 1. Nonetheless, riparian areas provide important functions for threatened, endangered, and sensitive terrestrial wildlife that require consideration by landowners and land managers. WDFW regional habitat biologists, tribal biologists and/or other local habitat experts can assist in identification of site-specific terrestrial species needs. Because riparian protections benefit both aquatic and many terrestrial wildlife species, concentrating protections around riparian areas may also be an efficient use of resources.

1.5. Relationship with Washington's Development Laws and Regulations

1.5.1. Relationship with the Growth Management Act (GMA)

The GMA requires local jurisdictions to designate and protect critical areas, and in so doing, use best available science and give special consideration to anadromous species[5]. The GMA also encourages state agencies to provide technical assistance to counties and cities in the review of their critical areas ordinances (CAOs), comprehensive plans, and development regulations [RCW 36.70A.130(6)(g)]. While the Washington State Department of Commerce (Commerce) administers the GMA, WDFW is the lead state agency for advising local governments on matters related to one type of critical area: Fish and Wildlife Habitat Conservation Areas (FWHCAs), and we produce PHS Management Recommendations like this Volume 2 in support of that role.

This document provides guidance that is consistent with the GMA, under which local governments exercise their land use responsibilities: specifically, protection of the functions and values of critical areas. It also reflects the legal and policy framework within which WDFW and the PHS program operate, which includes among other things providing a source of best available science necessary to support local governments in distinguishing and delineating those critical areas (e.g., FWHCAs).

WAC 365-190-130
FISH AND WILDLIFE HABITAT CONSERVATION AREAS

(1) "Fish and wildlife habitat conservation" means land managed for maintaining populations of species in suitable habitats within their natural geographic distribution, so that the habitat is sufficient to support viable populations over the long term and isolated subpopulations are not created. This does not mean maintaining all individuals of all species at all times, but it does mean not degrading or reducing populations or habitats so that they are no longer viable over the long term. Counties and cities should engage in cooperative planning and coordination to help assure population viability.

Fish and wildlife habitat conservation areas contribute to the state's biodiversity and occur on both publicly- and privately-owned lands. Designating these areas is an important part of land use planning for appropriate development densities, urban growth area boundaries, open space corridors, and incentive-based land conservation and stewardship programs."

WDFW understands that local jurisdictions have existing critical area regulations that have been approved by elected officials and in many cases have been found to be compliant with GMA through the Growth Management Hearings Board and courts. We acknowledge that revising a critical area regulation can be a lengthy, expensive, and contentious process, and so jurisdictions frequently do not make updates to their CAOs more frequently than required by law or rule. In this volume, we aim to be more precise about where recent science has improved our certainty around the need for riparian protections, as well as for specific practices; and how to incorporate best available science and WDFW's management recommendations.

WDFW also recommends local jurisdictions continue considering PHS best available science (e.g., Volume 1; PHS maps), incorporating PHS Management Recommendations, and seeking technical assistance from WDFW's regional habitat biologists not just when updating and implementing critical area policies and regulations, but in all land use planning efforts.

5 RCW 36.70A.172(1): "In designating and protecting critical areas under this chapter, counties and cities shall include the best available science in developing policies and development regulations to protect the functions and values of critical areas. In addition, counties and cities shall give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries."

1.5.2. Relationship with the Shoreline Management Act (SMA)

As with GMA, WDFW plays a role of technical advisor under SMA, working directly through locally led development processes, with the goal of addressing needs for fish and wildlife. Under SMA, the Department of Ecology (Ecology) has a role approving Shoreline Master Program (SMP) updates when they are deemed consistent with all statutory and regulatory requirements. Ecology also has a direct role in implementation of SMPs, including issuing the final decision to approve, deny, or put conditions on locally issued conditional use permits and variances. [Under GMA, Commerce does not approve comprehensive plan updates or CAOs.]

The goal of SMA is "to prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines" (RCW 90.58.020). To achieve that end, WDFW recommends local jurisdictions designate riparian areas and provide the same levels of protection for them within the SMA jurisdiction areas as they do under GMA. While the SMA does not apply to streams with 20 cubic feet per second (cfs) or less mean annual flow, we recommend the application of the guidelines in this Volume 2 to all rivers and streams, regardless of size.

WAC 173-26-186 GOVERNING PRINCIPLES OF THE [SMP] GUIDELINES

(8) "Through numerous references to and emphasis on the maintenance, protection, restoration, and preservation of "fragile" shoreline "natural resources," "public health," "the land and its vegetation and wildlife," "the waters and their aquatic life," "ecology," and "environment," the act makes protection of the shoreline environment an essential statewide policy goal consistent with other policy goals of the act. It is recognized that shoreline ecological functions may be imparted not only by shoreline development subject to the substantial development permit requirements of the act but also by past actions, unregulated activities, and development that is exempt from the act's permit requirements. The principle regarding protecting shoreline ecological systems is accomplished by these guidelines in several ways, and in the context of related principles."



The Shoreline Management Act includes a goal to balance multiple uses, including protecting natural resources and providing public access to waters of the state./ Andy Walgamott






Riparian areas provide habitat for many types of birds at one or more life stages, especially during breeding season and for food year round. Photo credits: Sandpiper chicks in nest/Laura Rogers; Northern Harrier foraging low over marshy vegetation/Brad Collins; male Belted Kingfisher watching for fish from fallen tree limb/Anna Owen; Purple Martin pair resting on piling above their nest-box/Kim Eggleston

1.6. Organization of Volume 2

Chapter 1 aims to establish Volume 2's purpose and intent; articulate WDFW's values; and provide policy context regarding protection and designation of riparian ecosystems.

In Chapter 2, we define the RMZ based on $SPTH_{200}$ with special considerations for urban and dryland landscapes; and provide a stepwise process for identifying and delineating the RMZ both for requiring riparian protections and for classifying RMZs as a FWHCA under GMA.

Chapter 3 articulates policies, plans, and practices that protect riparian ecosystems. WDFW recognizes that counties and cities have a long history of providing such protections, and the responsibility to include best available science when updating CAOs. The protection recommendations described in this chapter are intended to help counties and cities moving forward with reviewing and updating their CAOs and other relevant policies and plans.

Chapter 4 explains the importance of restoration in riparian management, which is necessary for recovery of the degraded riparian functions present in many locations and is critical to recover salmon stocks and preserve Washington's riparian-dependent Priority Species. To that end, we outline voluntary approaches to improve riparian functions. Although Volume 2 is not a restoration guide, it is applicable to restoration practitioners in that it describes management actions that enhance riparian functions and values. We do not address restoration project design or standards but provide links within this chapter to resources that do.

Chapter 5 will assist with developing monitoring programs in support of adaptive management, designed to ensure transparent programs that consistently deliver sufficient protection of riparian functions. Careful monitoring and adaptive management are particularly important when a land use may harm a critical area and scientific information about the likely severity of harm is lacking. Although specific to local governments, this chapter provides valuable resources for any land manager interested in engaging in adaptive management.

Finally, this volume includes an appendix that contains a "how-to" process for utilizing WDFW's SPTH mapping tool to help determine recommended minimum RMZ widths around the state. The tool itself is available at wdfw.maps.arcgis.com/apps/MapSeries/index.html?appid=919ea98204eb4f5fa70eca99cd5b0de1.

Chapter 2. Riparian Management Zone Delineation

2.1. Introduction

We define the extent of the riparian ecosystem as the area that provides full ecological function for bank stability, shade, pollution removal, contributions of detrital nutrients, and recruitment of large woody debris. For the purposes of management or regulatory protection, the riparian management zone (RMZ) encompasses the riparian ecosystem, and–when present–the channel migration zone (CMZ) to account for lateral movement of the riparian ecosystem over time. RMZs can also provide habitat for many terrestrial wildlife species including movement corridors. WDFW categorizes the riparian ecosystem as a Priority Habitat, and thus recommends local jurisdictions designate all riparian areas as critical areas: specifically, Fish and Wildlife Habitat Conservation Areas (FWHCAs), as mentioned in Chapter 1.

The RMZ provide an initial framework for delineating, assessing, planning, and managing riparian ecosystems. The RMZ as defined here is not necessarily the same as setbacks or buffers. Setbacks are areas meant to protect an important feature (e.g., a stream or wetland) from certain types of adjacent activities, e.g., the area separating a building from the bank of a river. Setbacks are not typically designed to provide ecological function. On the other hand, buffers, which also protect important features, are commonly undeveloped, naturally vegetated areas that can contribute habitat and in the case of a stream, to riparian functions. In this document, we reserve the use of the term RMZ to mean the area capable of providing full function and managed to that end.

2.2. Foundational Concepts in RMZ Determinations

2.2.1. Desired Future Condition

A major goal in fulfilling WDFW's mission to preserve, protect, and perpetuate Washington's fish, wildlife, and ecosystems is the protection and restoration of healthy, intact, and fully functioning riparian areas. More specifically, the goal will be achieved through management strategies that result in ecosystem composition and structure that provides the five key ecological functions associated with riparian ecosystems. A useful benchmark for this goal is desired future condition (DFC) for riparian areas. DFC describes what land managers are attempting to achieve, often in terms of composition and structure (e.g., vegetation or land-use), over a period of time in a given geographic area. The DFC we recommend results in fully functioning riparian ecosystems as measured by the five key ecological functions (bank stability, shade, pollution removal, contributions of detrital nutrients, and recruitment of large woody debris) in western

Washington. The DFC for composition and structure is old, structurally complex conifer-dominant forest. Such forests exhibit large diameter trees, contain numerous large snags and logs, and have multi-layered canopies and canopy gaps, which promote understory plant diversity.

Throughout the Columbia Plateau, differences in hydrology and geomorphology manifest substantial site-level differences in composition and structure of riparian vegetation, and hence, the DFC for composition and structure is more site-dependent in the Columbia Plateau than in western Washington. Nonetheless, the DFC in the Columbia Plateau is based on the same concepts of ecosystem composition and structure that support the same five key ecological functions in forested regions; specifically, biologically diverse vegetation communities consisting of native trees, shrubs, grasses and forbs. In addition, the DFC for the upland portion of the riparian ecosystem which serves as the zone of influence and contributes to the pollution removal function in the Columbia Plateau is often intact native shrub-steppe or prairie vegetation.

2.2.2. Site-Potential Tree Height (SPTH) Background

A fundamental component of our recommendation is the use of site-potential tree height (SPTH). In this section, we provide background information on its origin, applicability, and usefulness (see also Volume 1, Chapter 9).

In 1993, a group of experts (Forest Ecosystem Management Assessment Team [FEMAT]) was convened to develop a conceptual model to determine how to protect riparian areas in forested landscapes. This model has come to be known as the FEMAT curves (FEMAT 1993). Though this model is over 25 years old, it continues to be one of the most useful conceptual models informing riparian management.

The FEMAT curves provide a conceptual model of important riparian functions and how those functions change with increased distance from the stream channel (Figure 2.1). The model conveys two important points: (1) four of the five riparian ecosystem functions or processes occur within one 200-year SPTH; and (2) the marginal return for each function or process decreases as distance from the stream channel increases. Thus, designating a riparian area based on at least one $SPTH_{200}$ is a scientifically supported approach if the goal is to protect and maintain full function of the riparian ecosystem for aquatic habitat and species, including salmon.

The FEMAT curves and SPTH have been used to describe the lateral extent of riparian ecosystems, and accordingly, the width of the RMZ needed to provide full riparian ecosystem function.

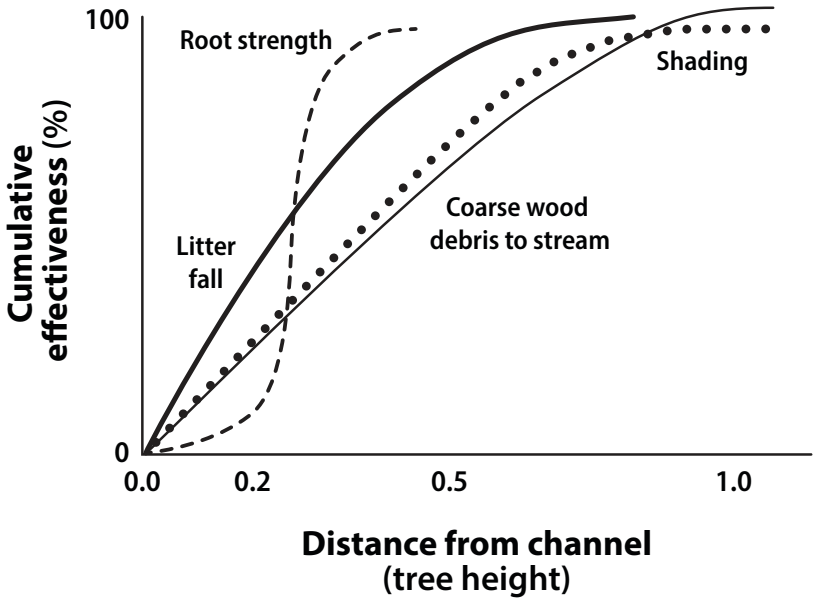


Figure 2.1. The "FEMAT Curves" (FEMAT 1993): a generalized conceptual model describing contributions of key riparian ecosystem functions to aquatic ecosystems as the distance from a stream channel increases. "Tree height" refers to average height of the tallest dominant tree (200 years old or greater); referred to as site-potential tree height (SPTH).

FEMAT (1993, p. V-34) defined SPTH as "the average maximum height of the tallest dominant trees (200 years or more) for a given site class." The key phrase in this definition is "200 years or more" which refers to the approximate minimum age of old-growth forests. This reflects FEMAT's underlying assumption that old-growth forest conditions are needed for full riparian ecosystem functions. WDFW uses SPTH at 200 years (abbreviated $SPTH_{200}$) in our recommendations in this Volume 2.

FEMAT defined Site potential tree height (SPTH) as "the average maximum height of the tallest dominant trees (200 years or more) for a given site class."

"200 years or more" is the approximate minimum age of old-growth forests which are thought to be necessary for full riparian ecosystem functions.

Given its utility, the height of site-potential trees has been described for a variety of tree species and can be readily found in silvicultural literature. Mean heights of dominant trees in riparian old-growth forest of Washington range from 100 to 240 feet (Fox 2003). The wide range of heights reflects differences in site productivity, i.e., local differences in soil nutrients and moisture, light and temperature regimes, and topography. Site productivity is described quantitatively through a site index, which is the average height that dominant trees of a species are expected to obtain at a specified tree age at a given location.

2.2.3. The Importance of Channel Migration Zones (CMZs)

Not all streams have CMZs, but where CMZs are present, it is necessary to map the CMZ in order to establish an RMZ. The Washington Forest Practices Board Manual (DNR 2004) provides a useful definition of the CMZ as "the area where the active channel of a stream is prone to move and this results in a potential near-term loss of riparian function and associated habitat adjacent to the stream, except as modified by a permanent levee or dike" (DNR 2004, Section M2).

Protecting the CMZ from incompatible land uses (e.g., development) is important for providing riparian ecosystem functions. Human alterations to river channels that limit channel migration and bank erosion can degrade aquatic and riparian habitats. For these reasons, geomorphologists have developed protocols for delineating CMZs. Further, RMZ delineation along streams with CMZs ensures that riparian functions do not degrade as a channel moves. Proper delineation also helps landowners avoid siting homes and infrastructure in CMZs that coincide with geologically hazardous critical areas and floodplains (**WAC 365-190-120[6f]**).

2.2.4. Relationship of CMZs and Floodplains

This document does not include guidance on the integration of floodplains into RMZ delineation (see footnote 4 for a brief explanation about the active floodplain). However, a general understanding of floodplains and their relationship to CMZs is valuable, as the two often overlap.



Beavers are considered to be ecosystem engineers. The dams they build, the resulting ponds created, and the surrounding areas from which they fell trees all provide habitat for many other animals./Liz Bocksteigel, WDFW

Both federal and state regulations establish floodplain protections. Floodplain data and **maps** (typically 100-year floodplains) are readily available through the Federal Emergency Management Agency's National Flood Insurance Management Program. Ecology is the state's authority as lead on floodplain management and we support their recommendations for management of **Frequently Flooded Areas** (another type of critical area specified in GMA) and the use of the **Floodplains by Design** grant program to reduce hazards and restore natural functions. Proper floodplain delineation and protection helps landowners and land managers avoid placing homes and infrastructure in areas at high-risk of flooding.

The Bureau of Land Management provides common clues to help determine the presence of an active floodplain (BLM 2015) such as visual evidence of frequent inundation, which may include but is not limited to:

- Fresh deposits of fine sediment;
- Floodplain vegetation matted down or lying flat on floodplain from overbank flow or by deposition or overbank sediment;
- Debris piled on the upstream side of tree trunks; or
- High water marks seen on rocks, trees, or other stationary objects; and ice-rafted deposits on the floodplain.

However, BLM advises caution when relying on these visual clues. Furthermore, looking for signs that an active floodplain is present is only the first step toward delineating the outer edge of an active floodplain. We recommend reviewing BLM's technical reference titled *Proper Functioning Condition Assessment for Lotic Areas* (BLM 2015) and to consult Ecology for assistance regarding floodplain delineation and protections.

Good floodplain management is not only beneficial for human communities, it is also good for fish and wildlife. Although we do not describe use of the 100-year floodplain to measure the RMZ in Volume 2, we recommend that landowners and land use decision makers treat floodplains similarly to RMZs due to their importance to instream health, as habitat, and for their ecological services.

2.3. Procedures for RMZ Delineation

To conserve riparian habitat, one must first establish the lateral extent (i.e., width) of the RMZ. In Chapter 1, we noted that an RMZ encompasses the riparian zone and zone of influence (Figure 2.2), and, where present, considers the CMZ (Figure 2.3). In this section, we outline general steps for collecting site-specific information essential to map an RMZ. These steps will help you identify a site's proximity to streams as well as essential site characteristics. With this information, we then explain how to delineate an RMZ.

In the rest of this section, we explain how to:

- Identify the ecoregion in which the riparian ecosystem is located (e.g., forested or dryland);
- Verify the presence of a stream;
- Identify the inner edge of the RMZ; and finally
- Determine the RMZ width.

2.3.1. Determining Ecosystem Location

We have identified two distinct types of ecoregions statewide, each with a slightly different RMZ delineation procedure: (1) Forested, and (2) Dryland. In general, forested ecoregions dominate western Washington, northeastern Washington, and portions of southeast, north central, and eastern Cascades. Dryland ecosystems are more readily contained in the Columbia Plateau Ecoregion east of the Cascade Range.

Landowners and land use planners should utilize the SPTH mapping tool, described in Appendix 1, to determine the ecoregion where the river or stream lies. Appendix 1 also provides instructions for using this tool to determine the 200-year site-potential tree height ($SPTH_{200}$) at a given location.



Site visits are important because small streams are often unmapped, including in GIS tools commonly used for planning and permitting. Shaner Creek, Thurston County/Janet Anthony, WDFW

2.3.2. Verifying the Presence of a Stream

Once you have identified which ecoregion you are in (e.g., Columbia Plateau), a qualified professional[6] should visit the site to verify the stream's location on or near the project area. It is very important not to rely solely on "stream maps" (e.g., DNR stream layer, National Hydrography Dataset) in place of a site visit (which is also important for mapping RMZs) because existing mapped stream layers often have errors, including streams whose locations are mapped inaccurately on the landscape, and streams actually present on the landscape that are missing from maps. Instead, use the site visit to validate existing stream maps.

[6] Qualified professionals can be entities and individuals identified by the jurisdiction, WDFW regional habitat biologists, tribal biologists, Ecology staff, and/or other individuals familiar with stream verification and who have local expertise (e.g., Conservation District staff, Stream Teams, etc.).

2.3.3. Identifying the Inner Edge of the RMZ

Once you have verified a stream's location, proceed to locate the inner edge of the RMZ. Accurate RMZ delineation is dependent on using the correct starting point. In this section, we describe how to determine the location of the RMZ's inner edge using either the Channel Migration Zone (CMZ), if one is present; or the Ordinary High-Water Mark (OHWM). Ecology, as the state's water quality lead, provides extensive guidance and resources associated with OHWM or CMZ, and those resources are referenced here forward.

2.3.3 (A). Identifying Ordinary High-Water Mark (OHWM)

Delineate the RMZ's inner edge by identifying the OHWM along both sides of the stream following the procedure in Chapter 3 of Ecology's **OHWM delineation manual** (Anderson et al. 2016).

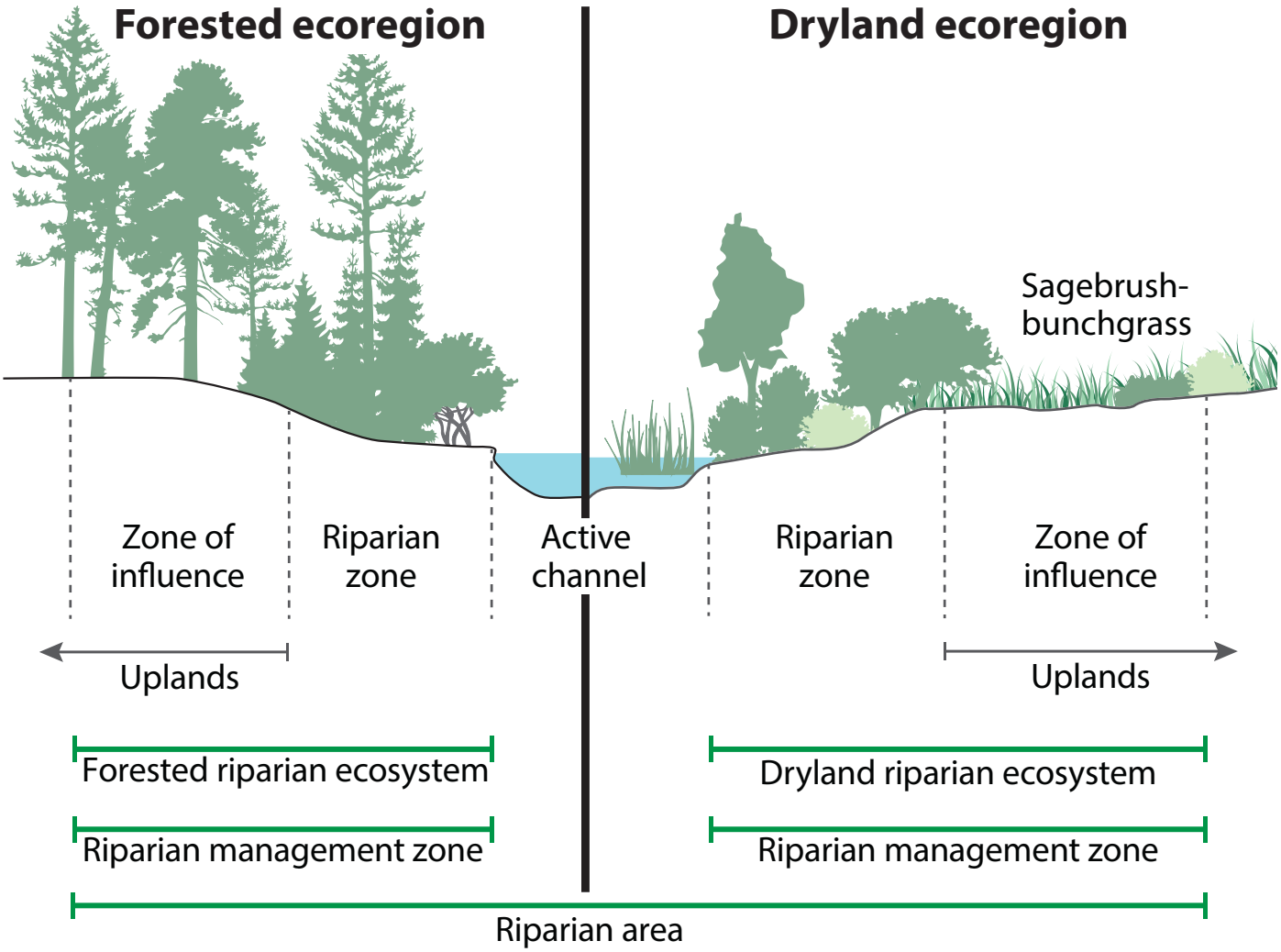


Figure 2.2. The diagram depicts the riparian management zone (RMZ) for both forested (left) and dryland (right) ecoregions. The RMZ is coincident with the riparian ecosystem, *which consists of the* riparian zone *(riparian vegetative community) and the* zone of influence. *The* riparian zone *extends from the edge of the active channel towards the uplands and it includes areas where vegetation is influenced at least periodically by flowing waters. The* zone of influence *includes areas where ecological processes significantly influence the stream, at least periodically.*



A drone photo showing an area of the Nooksack River in Whatcom County. Taken during summertime low flows, the existence of multiple braided channels is evident./Ross Zimmerman, Department of Natural Resources

2.3.3 (B). Identifying the Channel Migration Zone

Delineate the RMZ's inner edge by identifying the edge of the CMZ. Information about CMZs is available for certain streams in the state. For example:

- **SMA-Covered Shorelines** – During Shoreline Master Program comprehensive updates, many jurisdictions map the general location of CMZs associated with shorelines that fall under the jurisdiction of SMA (RCW 36.70A.480). Note that even smaller streams not subject to SMA jurisdiction can have CMZs. In these cases, we recommend jurisdictions still identify and analyze CMZs to protect riparian ecosystems and public health and safety.
- **Puget Sound Streams** – The federal Endangered Species Act may require CMZ delineation in Puget Sound basin streams under the FEMA National Flood Insurance Program Biological Opinion for Puget Sound.
- **Other Local Examples** – Check with your jurisdiction to see if they have more detailed CMZ maps.

Ecology provides the following resources which can help landowners and land managers assess the presence and extent of CMZs where maps and data on CMZs do not currently exist:

- CMZ Home Page provides a high-level look at CMZ identification, and references useful documents;
- Channel Migration Processes and Patterns in Western Washington (Legg and Olson 2014) describes the general channel migration processes that occur in western Washington;
- A Methodology for Delineating Planning-Level Channel Migration Zones (Olson et al. 2014) provides a process for delineating "planning-level" CMZs and gives a few good examples in the appendices;
- A Framework for Delineating Channel Migration Zones (Rapp and Abbe 2003) is a more in-depth guide on how to develop "detailed" CMZs; and
- Screening Tools for Identifying Migrating Stream Channels in Western Washington (Legg and Olson 2015) outlines the "CHAMP" (channel migration potential) GIS layer with guidance on using it to identify high-risk CMZs.

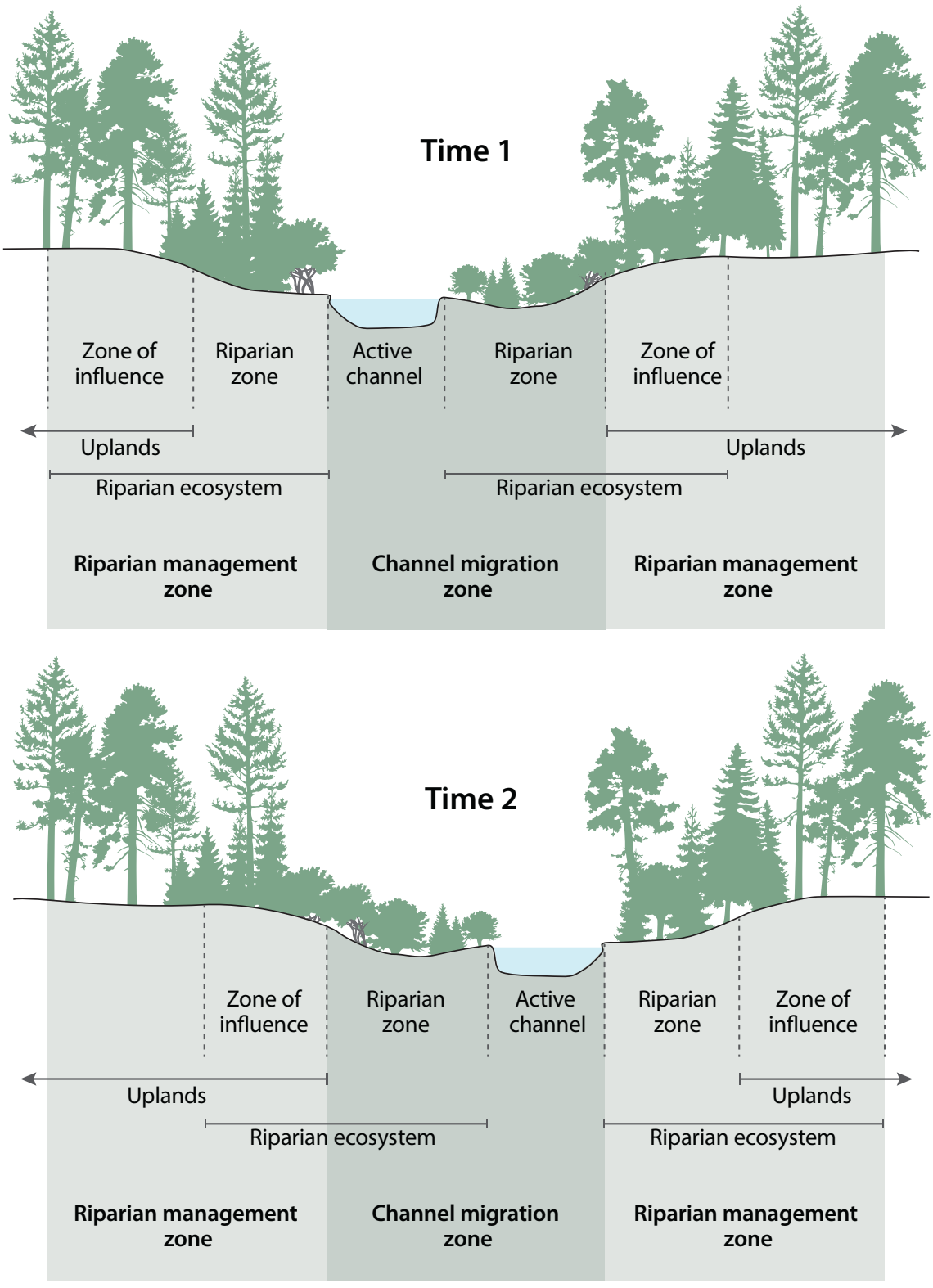


Figure 2.3. This diagram depicts the spatial relationship between the riparian management zone (RMZ) and channel migration zone (CMZ) over time. As the active channel moves laterally within the CMZ, the riparian ecosystem moves with it. As a result, when considering the establishment of an RMZ, delineation should occur at the edge of the CMZ to account for the full extent of both the present day and future riparian ecosystems. Time 1 and Time 2 could be separated by days or centuries. This depiction of a forested system is one representation of a CMZ, which are also present in dryland systems: both should be managed for accordingly.

2.3.4. Determining RMZ Width

Once you have determined the location of the RMZ's inner edge, you then establish the width of the RMZ. The following stepwise process aims to establish recommended minimum delineation distances based on $SPTH_{200}$, vegetation composition, and pollution removal function (Figure 2.4). We say "recommended minimum" because upland adjacent land uses may require further adjustment of the RMZ to provide adequate pollution removal functions. Landowners and land use regulators should also consider additional actions to support wildlife connectivity and/or to protect riparian adjacent Priority Habitats.

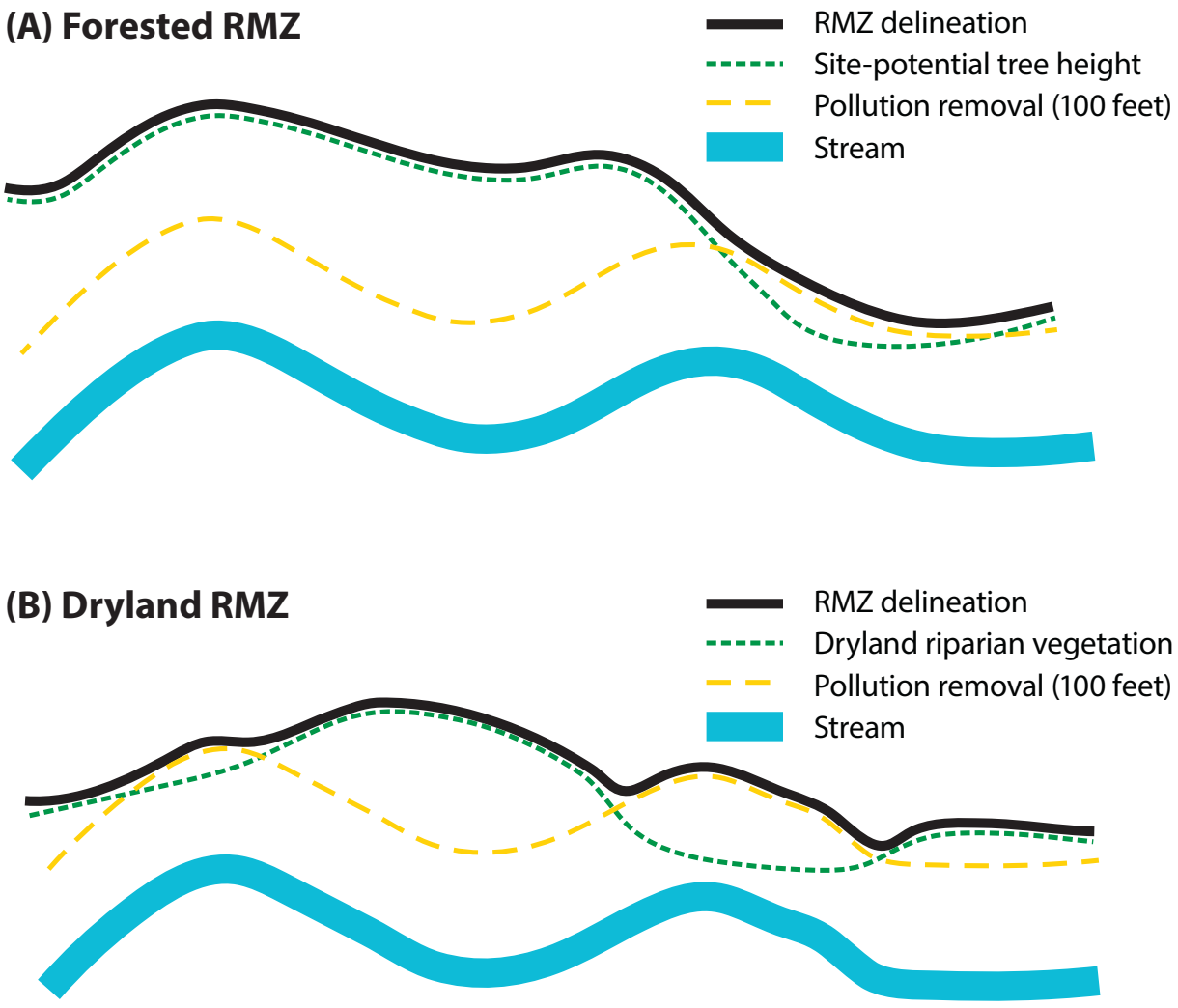


Figure 2.4. Aerial view of variable width RMZ delineation process for forested (A) and dryland (B) systems.

- *Step 1: Identify the SPTH or full extent of the riparian vegetative community (green);*
- *Step 2: Overlay a 100-foot pollution removal distance (yellow);*
- *Step 3: Delineate the RMZ (black) as the greater of the two distances.*

We tailor the following guidance based on two types of ecoregion: (1) Forested and (2) Dryland.

2.3.4 (A). Forested Ecoregions

Forested ecoregions are well-suited for using $SPTH_{200}$ consistently to establish RMZ widths, and so for these areas, landowners and land managers can rely on the $SPTH_{200}$ information provided in the SPTH mapping tool (see Appendix 1). The tool provides the derived average height attained by the dominant tree species at age 200 years ($SPTH_{200}$) using the U.S. Natural Resource Conservation Service (NRCS) forest productivity site index values, which we recommend for delineation of RMZs (see Sec 9.3 in Volume 1 for background on the origin and use of $SPTH_{200}$). In forested ecoregions, contributions of large wood as a riparian ecosystem function often define the farthest lateral extent of the RMZ.

Occasionally, the $SPTH_{200}$ may be less than 100 feet, in which case the pollution removal function (described in more detail in Section 2.3.5 below) defines the lateral extent of the RMZ.

In Washington, $STPH_{200}$ can be as large as 260 feet: therefore, be sure to evaluate each soil polygon within 260 feet of the stream channel to ensure that RMZ delineation is in fact being driven by the largest dominant tree species.

2.3.4 (B). Dryland Ecoregion

Riparian ecosystems in arid and semi-arid regions of North America (also referred to as the dryland ecoregion) make up less than 1 to 3 percent of the landscape (Patten 1998). Dryland riparian ecosystems are hydrologically linked to and influenced by adjacent surface waters; as a result, surface waters sustain riparian vegetation that is clearly distinct from upland vegetation.

Riparian ecosystems in dryland environments are highly variable due to various site-level conditions. While these ecosystems may support large trees in low gradient floodplains, tree presence in riparian ecosystems throughout the dryland ecoregion is much more varied than in forested ecoregions, and so in many cases, the contribution of large wood no longer serves as the outermost ecological function for RMZ delineation. Further, riparian vegetation may be minimal or even non-existent, particularly along degraded, incised streams. In dryland ecoregions, the outermost of

Protecting Columbia Plateau's Priority Habitats Supports Riparian Health

Native shrub-steppe vegetation and other drought-tolerant plant communities dominate Washington's dryland environments. Approximately 450 plant community associations occur in this region, with over 20% of these associations considered vulnerable (WDFW 2005, p. 523). Among the most imperiled ecosystems in North America, historical shrub-steppe has been greatly reduced due to conversion to other land uses (Vander Haegen 2007).

Riparian areas are critical to most animal species using shrub-steppe. Biodiversity in these vegetative communities increases dramatically where surface water occurs, and riparian areas directly support numerous species found only in or near water (Rogers et al. 1988, Johnson and O'Neil 2001). Linking and protecting upland adjacent Priority Habitat(s) not only aims to support Washington's wildlife and their associated habitat conservation goals, but also works to protect and maintain riparian ecosystem integrity.

three factors drives delineation of the RMZ: (1) $SPTH_{200}$ (if trees are present); (2) riparian vegetative community; or (3) pollution removal function.

2.3.4 (C). Considerations in Highly Modified and Urban Systems

In some locations, riparian systems have been substantially modified, and current site-specific conditions may not provide adequate indication of where riparian vegetation would naturally occur. On the whole, this is particularly true of riparian systems in dryland ecoregions. In these instances, we recommend considering nearby sites with unaltered vegetation or selecting a representative site with similar bank height and gradient conditions to identify adequate riparian vegetation delineation for both protection and restoration.



A modified riparian area within an agricultural landscape in Kittitas County. The stream channel was likely straightened decades ago. More recently, small bridges were built across the stream for pivot sprinklers to move back and forth. To allow ease of sprinkler movement, no woody vegetation is allowed to grow./Jennifer Nelson, WDFW

Similarly, four major urban areas (Seattle, Spokane, Tacoma, and Bellingham) in forested ecoregions lack NRCS soils data. For these areas, WDFW identified nearby NRCS soils polygons and calculated weighted averages as estimates reflective of the surrounding environment ("imputed $SPTH_{200}$"). Much like in forested areas where $SPTH_{200}$ data are available, we recommend using the imputed $SPTH_{200}$ values specified for each of these urban areas to delineate RMZs within them.

2.3.5. Width delineation steps

Step 1: Use $SPTH_{200}$ if it is at least 100 feet.

In **forested ecoregions,** WDFW recommends full protection within one $SPTH_{200}$, identified with the use of our SPTH mapping tool (https://arcg.is/1ueq0a). The mean $SPTH_{200}$ in western Washington ranges from 100 to 240 feet (Fox 2003). Some soil polygons have $SPTH_{200}$ information for multiple tree species; therefore, each soil polygon within one $SPTH_{200}$ should be evaluated to ensure RMZ delineation is driven by the largest dominant tree species. Occasionally the $SPTH_{200}$ in forested ecoregions is less than 100 feet; for example, red alder is a fairly common riparian tree species, yet the $SPTH_{200}$ for this species does not always exceed 100 feet. If red alder is the only species for which $SPTH_{200}$ information is available for a certain location, and it is less than 100 feet, then skip to Step 3.

In **dryland ecoregions,** it is less common, but still possible to find riparian vegetation which includes–and may even be dominated by–large trees. Examples of large tree species in these areas are black cottonwood (*Populus trichocarpa*) and ponderosa pine (*Pinus ponderosa*). If $SPTH_{200}$ in dryland ecoregions exceeds 100 feet, then it should be used for the RMZ width.

Step 2: In dryland ecoregions, if $SPTH_{200}$ is less than 100 feet or if no large trees are present, identify the extent of the riparian vegetative community.

In **dryland ecoregions,** the riparian vegetative community is often comprised of shrubs, sedges, grasses, and forbs that are distinct from upland communities. For example, in the Columbia Plateau, vegetation within riparian ecosystems often exhibits an abrupt demarcation between the riparian zone and zone of influence. Phreatophytic[7] trees and shrubs and hydrophytic[8] herbaceous plants are confined to moist streamside areas, but the upland zone of influence may consist of sagebrush or bunchgrass communities [for more information, see Volume 1, Chapter 7 (Section 7.1.1)]. Where trees are not present or consist only of small species (less than 100 feet tall), WDFW recommends full protection of the entire riparian vegetative community. In some places the community may only be a few feet wide but in others it may extend up to several hundred feet, particularly when associated with a wetland or floodplain (Bermingham et al. 2013). Where the riparian vegetative community is less than 100 feet wide, go to step 3.

Step 3: Overlay 100-foot pollution removal delineation

The following applies to both **forested and dryland ecoregions.**

Our recommendation to protect full riparian function recognizes the importance of the pollution removal function of riparian ecosystems. Because pollution removal depends on multiple factors, including slope, soils, plant community composition, and upland uses, establishing a standard RMZ width for 100% pollution removal even at the site scale was impractical.

Where neither $SPTH_{200}$ nor the extent of the riparian vegetative community is at least 100 feet, we recommend RMZ delineation of a *minimum* distance of 100 feet, because this distance will achieve 95% or more removal efficacy of phosphorous, sediment, and most pesticides. To be clear, we value a similar removal efficacy for nitrogen, and at a 100-foot width, an RMZ would achieve only 80% removal efficacy for surface runoff containing excess nitrogen. However, the literature reflects that both the actual risk posed by excess nitrogen, as well as the efficacy of its removal, are very site-specific. In recognition of this, we strongly recommend that, where upland uses contribute nitrogen, the 100-foot minimum pollution removal distance be extended accordingly when determining the appropriate RMZ width.

Further, if RMZ widths are being based on a minimum pollution removal function at locations with steep slopes or poorly drained soils, distances greater than 100 feet should also be considered: this applies for all pollutants. Additionally, WDFW recommends cities and counties identify high intensity land uses that may be located adjacent to riparian areas within their jurisdiction and establish wider RMZs to enhance the pollution removal function in these locations as well, following guidance from Ecology.

When dealing with variables such as those outlined above, it may be necessary to seek expert assistance in determining the appropriate adjustments to RMZ widths based on the pollution removal function.

7 A phreatopyhtic plant is a species that obtains water from the subsurface zone of saturation either directly or through the capillary fringe (Thomas 2014).
8 Hydrophytic plants are those that are adapted to growing conditions associated with periodically saturated soils. They include obligate wetland plants that almost always occur in wetlands under natural conditions, facultative wetland plants that usually occur in wetlands but are occasionally found in non-wetlands, and facultative plants that equally likely to occur in wetlands or non-wetlands (Lichvar et al. 2012).

Chapter 3. Riparian Regulatory Protections

3.1. Introduction

This chapter gives guidance to help local governments review, develop, and implement regulatory tools to protect riparian ecosystems as critical areas, i.e., Fish and Wildlife Habitat Conservation Areas (FWHCAs). We describe key steps toward creating effective programs to protect riparian ecosystems consistent with the goals of the Growth Management Act (GMA), Shoreline Management Act (SMA), and Voluntary Stewardship Program (VSP). More specifically, this chapter describes recommendations for carrying out common land use activities and provides steps for developing Habitat Management Plans (HMPs). The riparian management zone (RMZ) should serve as the focal area to apply our recommendations.

Parcel-scale regulations are foundational to Washington's traditional land use regulatory approaches for protecting rivers and streams and their adjacent riparian ecosystem. However, sole reliance upon a regulatory approach at this site scale may result in loss of aquatic system function over the long term (see Volume 1). Thus, we believe that site-scale regulations must work in coordination with watershed-scale planning (Chapter 4) and that both should be monitored and adaptively managed (Chapter 5). In this chapter, we present considerations and recommendations for managing and protecting riparian ecosystems at both site- and watershed-scales.

3.2. Recommendations to Local Jurisdictions

Protection of watersheds commonly falls under the purview of agencies other than WDFW. Nonetheless, we encourage local jurisdictions (and their long-range planners in particular) to consider how land use patterns at all scales collectively affect fish and wildlife and other important ecosystem services.

The scientific literature review (see Volume 1) informs WDFW's position that protecting the area within one $SPTH_{200}$ from the edge of a stream channel maintains full riparian ecosystem functions for all aquatic species, including salmon, and promotes healthy, intact riparian ecosystems. This recommendation provides the greatest level of certainty that land use activities do not impair functions and values of riparian ecosystems. We recommend the use of monitoring and adaptive management (see Chapter 5) to inform regulations and evaluate the complement of both regulatory and voluntary conservation measures in achieving outcomes.

Land use decision makers should ensure all programs that can affect riparian habitat (e.g., CAOs; SMPs; and ordinances for clearing and grading, fire hazard reduction, and tree protection) are coordinated to optimize the ability of local policies, rules, and management activities to protect those habitats. Further, jurisdictions should look for gaps

such as inconsistencies, exemptions and loopholes, or inefficient practices (e.g., inspection and monitoring protocols) that could impede protection of or cause harm to riparian ecosystems.

To that end, we provide important questions to consider when reviewing CAOs, Comprehensive Plans, or other plans that can affect riparian ecosystems:



The Coweeman River Joint Wetland and Conservation Bank in Cowlitz County includes riparian areas as a focus for both restoration and preservation./Chuck Stambaugh-Bowey, WDFW

1. Conservation Strategies:

- What external strategies exist (e.g., salmon recovery plans, reach-scale assessments, and incentive-based plans) to maintain, protect and restore riparian areas?
- Which of these strategies (if any) currently inform your regulatory, planning, and/or voluntary processes or programs?
- If these strategies are not in your current programs, could they be incorporated to provide additional benefits to riparian ecosystems? Are there other strategies that could also (or instead) benefit riparian ecosystems?
- Which of these strategies may help your jurisdiction satisfy mitigation obligations?
- How are riparian restoration and/or enhancement programs informed by these strategies?

2. Regulatory Buffers:

- Does your jurisdiction rely on $SPTH_{200}$ for delineating regulatory riparian buffers?
- If your jurisdiction does not rely on $SPTH_{200}$ for delineating those buffers, does your jurisdiction currently have regulatory buffers for riparian areas that are equal to or greater than the distance equal to $SPTH_{200}$?
- Are there buffer exemptions? If so, how do those affect riparian function across your jurisdiction?
- Do your buffers consider the CMZ?
- Do your buffers consider adjacent wetlands and appropriate wetland delineation methodology as prescribed by Ecology?
- If your jurisdiction's CAO or SMP buffers are less than $SPTH_{200}$, can you use the RMZ to identify areas to do mitigation or areas impacted that will require mitigation?

3. Restoration and Adaptive Management (see also Chapter 5):

- Can your jurisdiction use the RMZ to identify areas for incentive-based restoration?
- Do you have a monitoring and adaptive management program for improving permit implementation?

- Is your jurisdiction collecting information on effectiveness of protecting riparian areas?
- If you collect effectiveness information, what programs (e.g., incentives, regulations) could you improve to increase riparian conservation?

4. Other Programs and Regulations

- What other regulations separate from CAOs, may inadvertently affect riparian areas (e.g., clearing and grading ordinance that lack safeguards for riparian protection)?
- Are there opportunities to connect riparian areas with other protected areas (e.g., frequently flooded areas, geologically hazardous areas, green belts, parks, wetlands, and aquifer recharge areas)?

3.2.1. Recommendations for Common Activities in the RMZ

Local governments should regulate all land use activities that are likely to impact functions of a riparian ecosystem found within the RMZ to ensure, at a minimum, that the existing functions and values are protected from development actions. For the purposes of meeting requirements under GMA, SMA, and VSP, we describe the RMZ as the area in which functions and values are contributed to the riparian ecosystem: providing a delineated space not just for protection, but also for mitigation and management. We also recommend prioritizing the RMZ as the space for restoration[9]. We provide specific information and recommendations for the following ten common activities: (Note that neither the list of activities nor the recommendations themselves are exhaustive; for more information, contact your WDFW regional habitat biologist.)

1. On-site Sewage Systems (OSS)
2. Bank hardening
3. Clearing, grading, and placement of fill
4. Removal of noxious weeds
5. Forest practices and conversions
6. Firewise and wildfire hazard reduction
7. Removal of hazard trees
8. Non-compensatory restoration and enhancement
9. Emergency activities
10. Educational or Recreational Areas

1. **On-site Sewage Systems (OSS)** – Historically, developers sited OSS at lower elevations bordering streams, lakes and wetlands in order to use passive gravity flow. The disadvantage of these systems is that when drain fields are located near water features, they can more easily contaminate water with high loads of nutrients and toxic pollutants, causing significant impacts to flora, fauna and water quality. The State Department of Health adopted rules establishing public health standards for location, design, installation, operation, maintenance, and monitoring of OSS, including requiring setbacks from waterbodies (WAC 246-272A) which modern OSS systems, using pump systems, can support. Some OSS may meet public health standards even if located within RMZs; nevertheless, jurisdictions should exercise authority to require HMPs to ensure project proponents protect habitat functions of riparian critical areas.

[9] As explained previously, many riparian areas had already experienced a substantial degree of degradation before laws like GMA, SMA, and VSP were passed, so while protecting what level of riparian functions and values remain is essential, protection alone will not be sufficient for meeting the needs of the state's fish and wildlife species.

2. **Bank Hardening** – We recommend jurisdictions avoid allowing new development that requires bank protection now or is likely to in the future (consider channel migration, wind and wave action, and climate change), unless it addresses an imminent threat as an emergency activity (*see* Emergency Activities in this section below). Always look to alternative places to site a project so that no bank protection measures are needed. If measures cannot be avoided, require that a project proponent evaluate the effectiveness of bioengineering alternatives (also known as soft armoring) prior to proposing hard armoring. Follow bank protection recommendations in the Washington State Integrated Streambank Protection Guidelines (Cramer et al. 2002) when bank protection is unavoidable.

3. **Clearing, Grading, and Filling** – We recommend jurisdictions acknowledge impacts of clearing, grading, and filling on riparian areas in their CAOs by limiting these activities to areas outside the RMZ (unless directly related to restoration) as they can negatively affect riparian areas. If a clearing, grading, or filling project must encroach in an RMZ, limit disturbance and minimize effects to the greatest extent possible. Require that a qualified professional prepare an HMP describing how the project proponent will follow the mitigation sequence.

   Jurisdictions that exempt small areas from filling or grading ordinances in riparian ecosystems should calculate cumulative impacts from these exemptions. They should also mitigate impacts and subsequently establish monitoring to ensure that mitigation measures are effectively negating potential losses to habitat function.

4. **Invasive and/or Noxious Plant Removal** – Many CAOs do not require a permit for control and removal of invasive and/or noxious weeds within riparian ecosystem. We support this when weed control efforts (1) employ hand weeding with light equipment; (2) use only Ecology-approved aquatic herbicides and adjuvants (a substance added to herbicides to improve application); avoid use of hazardous substances; and (3) do not result in soil compaction. Local governments should retain some oversight authority for more extensive invasive and/or noxious plant control projects to ensure adequate protections of riparian functions, especially water quality. Most communities issue an exemption letter or permit, which should include conditions to ensure impacts to fish, wildlife, and habitat are minimal. It is important to note that even plants native to the region can, in certain circumstances, be detrimental to riparian areas. An example is in Puget Sound Prairies, where in the absence of periodic fire events (typically prescribed fire), common western Washington conifer species like Douglas fir outcompete native deciduous species (primarily Oregon white oak). In these circumstances, conifer removal and re-establishment of historical riparian conditions (oak and prairie vegetation) should occur under an approved HMP. WDFW regional habitat biologists can assist in preparing, reviewing, and implementing such a plan.

5. **Forest Practices and Conversions** – The state's Forest Practices Act (RCW 76.09 and WAC 222) regulates forest practice activities on forestland. We recommend that the proponent always contact DNR prior to conducting forest practice activities and seek technical assistance from a WDFW regional habitat biologist to ensure protections for Priority Habitats and Species. When conducting commercial forest practice activities, the forest practice rules—not the CAO—apply for protection of resources on site. Lands converted from forestry to another use require a special forest practice permit, and when converting land, local CAOs are applied. If conversion occurs, WDFW recommends timber harvests not be allowed within $SPTH_{200}$.

6. **Wildfire Hazard Reduction** – Wildfire is a concern in Washington, though the threat varies across the state. Local regulations to reduce wildfire hazards should be coordinated with a Firewise program in order to require landowners to consult with a Firewise professional (http://www.dnr.wa.gov/firewise) before removing trees or

manipulating vegetation in an RMZ. Understanding the composition of historical forest stands and shrub-steppe can help ensure retention of riparian functions when carrying out wildfire hazard reduction activities. When fuel (vegetation) reduction efforts involve the removal of merchantable trees, the proponent should check with the local jurisdiction and DNR, which may require a permit for tree removal.

7. **Removing Hazard Trees** – Tree trimming or removal in RMZs is sometimes necessary to address public safety concerns but should be balanced with the potential impacts to riparian ecosystem function. Jurisdictions should define a "hazard tree" (sometimes referred to as a "danger tree") as a threat to life, property or public safety, and require that the method of tree removal not adversely affect riparian ecosystem functions if possible. Specifically, we recommend that any removal of hazard trees involve an avoidance and minimization of damage to remaining trees and vegetation within the RMZ. We further recommend that local governments require a qualified arborist to evaluate requests for hazard tree removal.

   The qualified arborist should be able to establish when a tree presents an imminent threat to life, property or public safety. It is important to note that snags (dead trees) are a Priority Habitat feature for wildlife, and so should be preserved if not hazardous.



Like many dead and dying trees, this snag along the Chehalis River shows evidence of woodpecker activity. Grays Harbor County/Mary Huff, WDFW

   Some local governments use Forest Practice Rules (WAC 222-21-010[4]), which define a hazard tree as "any qualifying timber reasonably perceived to pose an imminent danger to life or improved property." This applies to any tree within 1.5 tree-lengths of the structure. A DNR forester can verify during a site visit that a tree is a hazard based on this definition, and thus removing the hazard would not be subject to the Forest Practice jurisdiction or require a Forest Practice Application.

8. **Restoration and Enhancement** – We encourage local governments to include in their CAOs allowances for restoration and/or enhancement of the riparian ecosystem, including in-channel or streamside work, especially on lands set aside for conservation. To the extent possible, jurisdictions should promote incentives and set up a streamlined review process for restoration or enhancement projects to help facilitate project proponents not just meeting the minimum requirements of the local CAO, but instead going "above and beyond". Significant resources are available to jurisdictions that address limiting factors in riparian areas or undertake high priority restoration activities that benefit salmon or other listed species (see Chapter 4 for information on restoration).

9. **Emergency Activities** – Local codes typically have provisions for emergency activities (e.g., bank stabilization to address imminent threats to homes) that provide relief from time delays related to procedural code requirements.

Local regulations should distinguish the immediate need to permit an emergency activity from the need to compensate for its impacts after-the-fact.

10. **Educational or Recreational Areas** – Public access to shorelines is a priority use under the SMA and providing educational and/or recreational developments such as trails, viewing platforms, or similar facilities may also enhance the public's understanding and appreciation of riparian areas, streams, and habitats. Thus, some focused use of the RMZ for educational and recreational activities may be desirable, if it does not create significant disturbances. Most CAOs include allowances for unpaved access to a stream for aesthetic or recreational enjoyment with defined limits on clearing to avoid impacts and minimizing soil, vegetation, and habitat disturbances: this is an allowance we support. That said, construction of trails could allow greater access for pets and other high intensity recreation, which may increase predation on, and/or disturbance of fish and wildlife species. Regulations should minimize impacts from recreational trails and interpretive facilities to the extent practicable, informed by PHS data and associated management recommendations.



A sculpture titled "The Indian Chief" greets visitors at the entrance to the Beebe Springs Natural Area along the Columbia River near Chelan./Alan Bauer

3.2.2. Project-specific Riparian Habitat Management Plans

When reviewing proposed projects near streams, local governments typically require applicants to provide detailed site-specific HMPs (often called a Critical Area Report). Here we describe six aspects of Riparian HMPs that we recommend be addressed in CAOs:

1. When HMPs are required;
2. Which additional critical areas must be delineated, and how;
3. Which specific land use actions must be identified, and how;
4. Mitigation requirements;
5. Monitoring and Adaptive Management requirements; and
6. Articulate who must prepare and review the HMP.

1. **When required** – We recommend jurisdictions require an HMP whenever someone proposes a land use activity in an RMZ (regardless of the jurisdiction's regulatory RMZ delineation) or when a proposal likely could affect riparian or aquatic functions. In cases where there is less confidence in the spatial accuracy of the RMZ, consider requiring a Riparian HMP when impacts occur adjacent to the RMZ's zone of influence.



It is not uncommon for riparian areas to overlap with other types of critical areas, including geologically hazardous areas, where landslides may bring input like large wood to streams./ Terra Hegy, WDFW

Maps, DNR's stream layers, the National Hydrography Dataset (NHD), and other (e.g., local) stream layers are important for triggering HMPs. An HMP should be required whenever a stream is present near proposed development activities, including but not limited to subdivisions (plats, short plats, and large lot subdivisions), land/vegetation disturbing activities (e.g., clearing and grading, septic drain field siting), and stormwater routing.

2. **Critical Area Delineation** – HMPs should have the extent of critical areas within and adjacent to a proposed project site identified, along with ecosystem functions that need protection. Follow the RMZ delineation procedure outlined in Chapter 2, along with locations of other critical areas on or near the site (e.g., wetlands, geologic hazards, frequently flooded, critical aquifer recharge areas; informed by Ecology). Also, identify salmon and other priority aquatic species that use the stream network in the immediate vicinity as well as up- and downstream. Likewise, HMPs should identify Priority Species that may use the riparian corridor and any other Priority Habitats to which the corridor is connected. Attach the delineation map (1) to the property's title to inform future property owners of the site's critical areas, and (2) use it to update the jurisdiction's critical areas maps.

3. **Land Use Action Identification** – A complete HMP should describe relevant management recommendations for Priority Habitats and Species found on or near the site. Include a map in the HMP showing the location of proposed land use actions. It should identify and quantify current and proposed disturbances to the RMZ and other FWHCAs.

4. **Mitigation** – The HMP should have a description of the project proponent's mitigation sequencing. It should describe in detail measures to avoid impacts and minimize unavoidable impacts (e.g., clustering, conservation easements, and seasonal construction restrictions). If mitigation or compensation is necessary, the HMP should identify ways to improve riparian ecosystem function by enhancing riparian corridor connectivity (e.g., removal of stream barriers) or by improving the quality of the riparian area (e.g., replacing invasive vegetation with appropriate native vegetation).

5. **Monitoring and Adaptive Management** –The HMP should describe requirements for monitoring and adaptive management. In addition, it should identify measurable standards and expectations to monitor compliance (e.g., areal extent of vegetative cover, composition of riparian tree species, maximum invasive plant cover). The HMP should identify frequency of visits to monitor the site (e.g., at year 1, 2, 3, 5, 8, and 10) as well as measurable triggers for requiring more actions (e.g., maximum percent area coverage of invasive plants). The HMP should specify who is responsible for preparing, reviewing, and submitting reports. Finally, if deemed necessary by the jurisdiction, the report should include a cost estimate for monitoring, and the project proponent should post a bond for this amount or more to allow for overages.

6. **Preparer and Reviewer** – A qualified professional biologist, botanist, or ecologist should prepare the HMP; additional expertise related to CMZs, unstable slopes, and wetlands may also be necessary. Additionally, an independent professional with similar qualifications should review the HMP. WDFW's regional habitat biologists can often serve in this role, especially for larger projects. USFWS or NOAA Fisheries should also review the HMP if the project might affect a federally listed fish or wildlife species.

3.3. Riparian Management in Urban Areas

Some people have raised questions about the applicability of RMZs to urban and urbanizing areas. These concerns generally fall into two categories: (1) the science on RMZs comes largely from agricultural and forestry settings, and so is perceived to be irrelevant to urban areas; and (2) there is a belief that the need to maximize density of development in urban areas is in direct conflict with the protection of riparian areas.

Concerns over the relevancy of literature on riparian functions to urban areas is largely unfounded. While most riparian ecosystem studies are from non-urban settings, the principles are the same. Functions of shade, bank stability, large wood recruitment, nutrient inputs, and pollutant removal operate similarly in urban areas as they do in other settings. However, within urban areas, these riparian ecosystem functions are often greatly diminished or even absent altogether.



Fish-bearing stream within an urban area of King County/Elizabeth Torrey, WDFW

The role that urban RMZs play in delivering habitat functions for aquatic and many terrestrial species is also like that in non-urban areas. Factors that may be different in urban areas are that urban riparian ecosystems may perform some functions at reduced levels due to their position in developed watersheds, which are often heavily degraded. However, intact RMZs in urban areas function as wildlife corridors that link habitat patches, which is critical for many species. In fact, sometimes RMZs in urban areas may be more important from a habitat standpoint, because within urban areas, adjacent uplands are often even more degraded than the RMZs, which then are often the only remaining areas where habitat functions are provided. Thus, a key element to maintain in urban RMZs is connectivity, both in and along streams.

Many Puget Sound salmon move through channelized streams, traversing heavily urbanized areas prior to reaching spawning grounds and as juveniles on a reciprocal journey to marine waters. Salmon must pass through a wide spectrum of development. For example, adults returning to spawn often start in urban cores (e.g., downtown Seattle), where streams are often channelized; then pass through areas with small lots and high urban density and into suburban

creeks where larger lots allow for more riparian protection; and finally, to rural lots with less development and better ecosystem health. When juveniles make their journeys in reverse, they generally spending more time in each of these areas than their parents did, and yet because of their small size, they are also at much greater risk of not surviving any of them. While the decades-long decline of many of our native salmon stocks illustrate just how challenging this is, their persistence—especially the subspecies which are showing signs of improvement—shows us what is possible. Therefore, it is critical that the urban environment maintain and enhance the ability of different species and ages of salmon to not just survive, but thrive, while in these disturbed areas.

Many of the actions we recommend urban communities focus on are the same or similar to those appropriate in less densely developed areas. For example, it is critical to maintain connectivity through properly sized culverts such that all fish can pass through at all relevant life stages. Additional riparian function can be achieved through revegetation efforts using native plants and by improving connectivity between habitat patches. A landscape analysis can help identify existing connections to protect, as well as areas where restoring connectivity is a priority. On the other hand, some actions are particularly well-suited to urban jurisdictions, like standards for Low Impact Development (LID) and state-of-the-art stormwater management. Further, when changes are made to urban infrastructure, this may create opportunities to improve riparian functions while contributing to new or improved public open spaces.

Recommendations for urban riparian ecosystems:

1. Delineate urban RMZs to protect what areas remain and to highlight lost or degraded areas to target for restoration.
2. Quantify current conditions, with a goal of maintaining and improving functions through regulatory and voluntary means.
3. Identify and prioritize restoration opportunities and projects within the RMZ:
    - Protect riparian functions that remain, especially in places that are relatively high functioning; implement actions that enhance degraded functions (see Chapter 4).
    - Prioritize opportunities to maintain and restore in-stream and riparian connectivity.
    - Adopt a stormwater design manual equivalent to Ecology's most current manual for western and eastern Washington.
    - Manage stormwater by adopting Ecology's latest manual regarding LID for new development, redevelopment and retrofit projects.

4. When replacing or removing existing infrastructure within an RMZ:
    - Map RMZ to pinpoint the best sites to restore – consider connectivity and adjacency to other Priority Habitats;
    - Improve aquatic connectivity by replacing culverts and removing barriers to movement;
    - Revegetate with native plants and consider improvements for wildlife by integrating structures necessary for nesting, breeding, and foraging;
    - As infrastructure is remodeled or replaced, incorporate additional setbacks from streams;
    - Control access to RMZ to limit soil compaction;
    - Avoid operating equipment near the stream to reduce sedimentation and soil compaction; and
    - Avoid using chemicals in the RMZ which are not approved for use there by Ecology.

3.4. Managing Watersheds



Tieton River on Oak Creek Wildlife Area in Yakima County, looking west toward the Cascade Mountains./Justin Haug, WDFW

As described in Chapter 8 of Volume 1, land use activities in a watershed can affect the stream network, even when the riparian ecosystem itself is relatively undisturbed. "Watershed management" is a land management approach that seeks to minimize negative effects of upland land uses on aquatic systems, which include riparian areas. The remainder of this chapter focuses on key watershed elements important to managing and protecting functional aquatic systems. Many of the approaches we outline here are non-regulatory and can complement regulatory efforts; as previously stated, we recommend cities and counties inventory current conditions of critical areas and, based on that inventory, develop watershed scale management plans accordingly.

Fully functional riparian ecosystems, in combination with targeted watershed protections, provide significant benefits to humans. These benefits, often described as ecosystem goods and services, include clean water; decreased flooding; increased nutrient cycling, sediment and pollutant filtering; reduced erosion; carbon sequestration; and cultural services such as recreational, spiritual, and other nonmaterial benefits. These services provide real but often unquantified economic benefits to individuals and society that largely go unnoticed until they are lacking.

3.4.1. Watershed-Scale Recommendations to Protect Aquatic Systems

To achieve desired ecosystem goods and services watershed managers should focus on influencing watershed processes that act upon water, wood, sediment, nutrients, vegetation, and pollutants at both the site- and watershed-scale. This section focuses on watershed-scale management.

Restore and Protect Watershed Processes – Efforts to improve watershed conditions should first focus on protecting and restoring watershed processes (e.g., natural disturbances) that create and retain habitat for fish and wildlife. Maintain the frequencies, magnitudes, and durations of natural disturbances (flood and fire being the most common) to the greatest extent that surrounding land uses can tolerate.

Manage Land for Stormwater – Stormwater runoff can change the timing, quality, and quantity of water provided to streams. Land uses should avoid/minimize changes to surface water flows. Protection and restoration efforts should focus on attenuating peak flows and reducing pollutants. Primary tools available to local governments include land use designations/zoning code, and stormwater regulations. See City of Redmond Watershed Management Plan (City of Redmond 2013).



Chum salmon gathered at a blocked culvert in Kitsap County./Brittany Gordon, WDFW

Manage Land for Stream Temperatures – Reduced riparian vegetation cover, decreased streamflow, and simplified stream channels (e.g., increased width-to-depth ratio and reduced groundwater exchange) can lead to increased water temperature (Volume 1, Chapter 4). Modifications like these are often the result of land use activities such as riparian vegetation removal; water diversions; unmanaged livestock grazing; and stream channelization associated with roads, levees, and other forms of development. Identify and restore thermally sensitive stream reaches at the watershed scale to maintain optimal stream temperatures for sensitive aquatic species such as salmonids.

Restore and Protect Connectivity – Manage watersheds to avoid creating longitudinal (e.g., dams, road crossings), lateral (e.g., levees and roads/buildings that cut off riparian areas and floodplains from their stream), and vertical (water withdrawals, reductions of floodplains) barriers to fish and wildlife movement and fragmentation of their habitat. This is especially important for highly mobile species that require a variety of habitat components across large areas. For example, where CMZs interact with floodplains, dikes and levees restrict the movement of the river or stream and also serve as a barrier for fish and many forms of wildlife.

Restoration to correct existing barriers to movement of water, wood, sediment, and species (e.g., removing blocking culverts) is a high priority with proven benefits for salmon. Connectivity to achieve nearly or completely contiguous RMZs is important to water quality and to achieve connectivity among patches. Ensuring connectivity both for terrestrial and aquatic wildlife works towards a more interconnected and healthy riparian system.

Plan for Climate Change – Impending changes to aquatic systems caused by climate change increases risk to species already threatened, and riparian ecosystem protection is one of the most useful responses to ameliorate those risks. For example, because more intense rainfall events will lead to wider streams, larger culverts will be necessary to support fish passage. WDFW, in collaboration with the University of Washington's Climate Impacts Group, created an online tool (UWCIG 2017) that estimates how much a stream's channel width will increase with climate change in the years 2040 and 2080. Connectivity within the RMZ allows voluntary migration for species and helps minimize temperature change and increase off-channel storage of water to reduce low flows.

Conduct Monitoring and Adaptive Management – Monitoring and adaptive management are important elements to both site-scale and watershed-scale; this is addressed further in Chapter 5.

3.4.2. Tools and Key References for Assessing Current Watershed Conditions

Washington's State agencies, including WDFW, have developed multiple tools to assist local government in assessing watershed conditions. Jurisdictions can utilize these resources—many available at no cost—to quantify changes in land cover, tailor planning for specific species, coordinate monitoring activities, inform restoration, and assess watershed health.

WDFW's High Resolution Change Detection (HRCD) is a spatial dataset that characterizes changes in land cover. This tool allows jurisdictions to evaluate in specific ways how watersheds are changing at a sub-parcel scale over 2- to 3-year intervals. This dataset is currently available throughout the entire Puget Sound basin and in some Eastern Washington watersheds. HRCD data is available at https://hrcd-wdfw.hub.arcgis.com/.

WDFW's Priority Habitats and Species program has several resources of interest to watershed planners. In addition to this two-volume document on riparian ecosystems, readers will find useful ideas in Land Use Planning for Salmon, Steelhead and Trout: A land use planner's guide to salmonid habitat protection and recovery (Knight 2009) and Landscape Planning for Washington's Wildlife: *Managing for Biodiversity in Developing Areas* (Azerrad et al. 2009).

Since 2004, the Pacific Northwest Aquatic Monitoring Partnership has collaborated with West Coast federal, state, and tribal agencies to coordinate monitoring activities and develop common approaches. This partnership provides best practices, mapping tools, and protocols, and serves as a voluntary clearinghouse for a wide variety of monitoring projects.

Since 2009, Ecology's Watershed Health Monitoring Project has been monitoring sites throughout the state to assess watershed health. This project's protocols can be adapted by jurisdictions and scaled to watersheds of various sizes. Data is stored in the Environmental Information Management database. This sophisticated database allows users to input and retrieve data via the web, reliably store it, and make it available for analysis. Quality assurance/quality control measures ensure data put into the database are of high quality.

Ecology's Puget Sound Watershed Characterization is a Puget Sound-wide tool that compares areas based on their suitability and value for restoration and protection. This tool informs two fundamental questions: (1) where to focus protection and restoration on the landscape first, and (2) what types of activities and actions (i.e., restoration, protection, conservation, or development) are most appropriate to that place. With insights gained by this tool, decision-makers can incorporate information regarding watershed processes to improve plans (e.g., comprehensive plans, subarea plans, CAOs, stormwater plans) and conservation efforts (e.g., in-lieu fee programs, open space tax credits, open space land acquisitions).

In 2016, the Washington Department of Commerce (Commerce) published Building Cities in the Rain (Ballash 2016) to help communities improve watersheds while redeveloping and revitalizing urban areas. The guidance describes an optional three-step process for prioritizing watersheds for stormwater retrofits in urban areas. Commerce's Puget Sound Mapping Project uses an interactive map to help users develop insights about how current and expected development patterns might affect the region's environmental health. The tool is designed to help decision makers consider information from the Puget Sound Watershed Characterization (described above) when making decisions regarding development projects, urban growth boundaries, and compensatory mitigation.

Finally, the University of Washington's Climate Impacts Group has developed a suite of tools, many in concert with WDFW, which may be useful for landowners and land use decision makers including climate trends, culvert design projections, and habitat connectivity.

Chapter 4. Restoring Riparian Ecosystems

4.1. Introduction

This chapter provides high-level guidance to landowners, land use decision makers, and conservation partners to promote restoration of riparian areas. Despite recent efforts to protect existing riparian systems, imperiled salmon stocks and other riparian dependent endangered species are not recovering as hoped (Table 4.1). Since non-indigenous settlement of Washington began in the 1800s, between 50 percent and 90 percent of riparian ecosystems have been lost or extensively modified (RCO 2019). While two subspecies (Hood Canal summer chum and Snake River fall Chinook) are moving towards recovery, most listed salmon in Washington are below recovery goals (Table 4.1).

The lack of recovery is also evidenced in the ongoing decline of salmon fishing, which affects the long-term health of Washington's tribes, Washington's economy, and our shared cultural heritage. The lack of salmon is one of the primary reasons Southern Resident Killer Whales are at risk of extinction, in addition to other impacts such as vessel disturbance and pollutants. (Lacy et al. 2017, Murray et al. 2019)

Table 4.1. Non-statistical evaluation of natural origin (wild) fish that returned to spawn with consideration for threats and factors affecting health including habitat, harvest, and hydropower. (Adapted from RCO 2019; Data sources: WDFW, Indian tribes, NOAA).

Below Goal (Endangered Species Act-Listed Salmon in Washington)			**Near Goal**
Getting Worse	*Not Making Progress*	*Showing Signs of Progress*	*Approaching Goal*
Upper Columbia River Spring Chinook	Upper Columbia River Steelhead	Mid-Columbia River Steelhead	Hood Canal Summer Chum
	Lower Columbia River Chum	Lake Ozette Sockeye	
	Lower Columbia River Coho	Lower Columbia River Steelhead	
Puget Sound Chinook	Lower Columbia River Fall Chinook	Snake River Steelhead	Snake River Fall Chinook
	Lower Columbia River Spring Chinook	Puget Sound Steelhead	
	Snake River Spring Chinook		
	Snake River Summer Chinook		



Former lake-bed above the area where the Glines Canyon Dam once stood on the Elwha River, Clallam County. Following dam removal, salmonids returned even faster than expected./Rachel Blomker, WDFW

Given the extent of historical loss, WDFW recognizes that protection alone of remaining riparian ecosystems, will not recover salmon or the Southern Resident Killer Whale population. Therefore, WDFW recommends restoring and enhancing riparian ecosystems to achieve healthy, intact, and fully functioning riparian systems statewide. Continued investments in restoration will be required at all levels of government and in concert with Washington tribes.

4.2. Restoration Actions

Although this section focuses on restoring riparian areas for the benefit of salmon, emulating historical conditions benefits many other aquatic and terrestrial species as well. WDFW is available to provide technical assistance and species-specific guidance for terrestrial species-focused restoration and recovery efforts. To recover salmon, we must protect all remaining existing riparian and watershed functions, while seeking opportunities to restore functions that have been lost over time. We provide the following information to assist the restoration community[10] in understanding what is important to restore.

4.2.1. Developing a Restoration Strategy

Aquatic restoration strategies typically start with a clear set of goals and objectives. The selection of appropriate restoration strategies is informed by the political, social, and ecological context of the watershed, and bounded by the extent of opportunities and constraints. It is important in ecosystem restoration to consider the habitat attributes and scale necessary for a desired suite of species, be they aquatic or terrestrial. At a watershed scale, restoration efforts should focus first on projects that offer the greatest potential for success. The Stream Habitat Restoration Guidelines (Cramer 2012) suggest the following prioritization of stream habitat restoration strategies that are specific to instream related activities most often geared at anadromous fish:

1. **Protect existing habitat.** Protect areas that provide healthy, high-quality habitat functions (strongholds, refugia, and key sub-watersheds) to prevent further degradation. Secure, expand, and link protected areas.

2. **Connect habitat.** Connect and provide access to isolated habitat, including instream, off-channel, and estuarine habitat made inaccessible by culverts, levees, fragmentation, or other man-made obstructions.

3. **Restore habitat-forming processes.** Employ land use recovery and watershed restoration techniques to restore processes that create, maintain, and connect habitats (including restoring sediment dynamics, large wood dynamics, and flow regimes; avoiding/removing manmade disturbances within the riparian ecosystem; and maintaining water quality, floodplain connectivity, and channel evolutionary processes). Employ a combination of active or passive restoration techniques, as necessary. Active restoration involves accelerating processes or attempting to change the trajectory of succession; passive restoration simply involves ceasing environmental stressors such as agriculture, grazing, or timber harvest, and then allowing nature to take its course.

10 Many watersheds in Washington have salmon recovery restoration goals that can be obtained from regional Salmon Recovery Boards or Lead Entities for Salmon Recovery. Lead Entities and Salmon Recovery Boards are in every region of the state, including those areas without salmon or other anadromous fish (https://www.rco.wa.gov/salmon_recovery/regions/regional_orgs.shtml).

4. **Create new or enhance existing habitat.** Improve existing or create new habitat for specific species by installing instream structures such as large woody debris; reconfiguring channel shape, cross-section, or profile to reduce incision or restore flow; or constructing one or more new side channels.

In conjunction with other state agencies and partners, WDFW provides multiple technical guidance documents to help design and implement riparian restoration projects that have proven successful in different types of landscapes, including on marine shorelines, and on river- and streambanks. These are part of a suite of Aquatic Habitat Guidelines found at https://wdfw.wa.gov/licenses/environmental/hpa/application/assistance. They include:

- Water Crossing Design Guidelines (Barnard et al. 2013)
- Stream Habitat Restoration Guidelines (Cramer 2012)
- Integrated Streambank Protection Guidelines (Cramer et al. 2002)
- Land Use Planning for Salmon, Steelhead and Trout: A land use planner's guide to salmonid habitat protection and recovery (Knight 2009)
- Draft Fishway Guidelines for Washington State (Bates 2000)
- Draft Fish Protection Screen Guidelines for Washington State (Nordlund and Bates 2000) Marine Shoreline Design Guidelines (Johannessen et al. 2014)
- Your Marine Waterfront (WDFW 2016)
- Protecting Nearshore Habitat and Functions in Puget Sound (AHGP 2010)

4.3. Implementing Riparian Strategies Through Incentives

There are several types of conservation incentives available to individuals and local governments:

- **Financial assistance:** grant programs that provide funding for conservation activities
- **Tax adjustment:** tax reductions for landowners undertaking conservation activities
- **Technical assistance:** advice and/or hands-on help for landowners on tools or techniques
- **Recognition:** promotion of landowners who undertake conservation actions

Each of these will be described (and examples provided) in more detail, below.

4.3.1. Financial Assistance

State and federal grant funds are available for riparian ecosystem conservation and restoration projects on public and private lands through the Recreation and Conservation Office (RCO) and Salmon Recovery Funding Board. To access these funds and to learn more, go to https://www.rco.wa.gov. Grant programs include:

- Aquatic Lands Enhancement Account
- Washington Wildlife and Recreation Program (Farmland, Forestland, Habitat, and Recreation categories)
- Estuary and Salmon Restoration Program—a program of WDFW
- Land and Water Conservation Fund
- Salmon Recovery and Puget Sound Acquisition and Restoration

Land trusts also help land owners conserve habitat for key aquatic and terrestrial species, often leveraging funds from foundations and other non-governmental sources; see www.walandtrusts.org for a county-specific list of land trusts.

For agricultural property owners, local conservation districts and the Washington State Conservation Commission (WSCC) can provide technical assistance to find an approach that works for the farmer and improves riparian ecosystem function. Technical assistance is also available from the federal Natural Resources Conservation Service (NRCS), Washington State University Extension, and WDFW. Additionally, a host of state and federal financial incentives to expand and maintain riparian functions within the riparian management zone (RMZ) are available, some of which are listed below. For example, the Conservation Reserve Enhancement Program (CREP) provides funding to landowners for riparian preservation and is the most successful riparian buffer program in Washington. Since CREP's 1999 inception in our state, more than 900 miles of stream buffers have been planted, and as of October 2020, producers had over 13,500 acres actively enrolled in CREP. Contact your local conservation district or the RCO to learn more.

- Conservation Reserve Enhancement Program (NRCS)
- Environmental Quality Incentives Program (NRCS)
- Conservation Stewardship Program (NRCS)
- Conservation Reserve Program (NRCS)
- Regional Conservation Partnership Program (NRCS)
- Agricultural Conservation Easement Program (NRCS)
- Agricultural Land Easements (NRCS)
- WWRP Farmland Preservation Grants (RCO)

Timber landowners have access to a variety of forestry-oriented conservation incentive programs (see list, below) and can also receive technical assistance from DNR's Forest Stewardship Program (foreststewardship@dnr.wa.gov, 360-902-1428):

- Forestry Riparian Easement (DNR)
- Rivers and Habitat Open Space Program (DNR)
- Healthy Forests Reserve Program (NRCS)
- Family Forest Fish Passage Program (DNR)
- Forest Legacy (USFS)
- WWRP Forestland Preservation Grants (RCO)



The federal Conservation Reserve Enhancement Program (CREP) funded this vegetation planting project along a stream in Skagit County./Wendy Cole, WDFW

4.3.2. Tax Reduction Incentives

Landowners can receive a substantial tax reduction by converting land into "open space" status because of the Open Space Taxation Act (WAC 458-30), enacted in 1970. Lands with riparian areas often qualify for this incentive; see your county assessor and local planning department for details.

4.3.3. Technical Assistance

Local governments and individual landowners who want to improve riparian habitat for a suite of species can request land use advice from a variety of sources, including:

- WDFW regional habitat and district wildlife biologists. Go to http://arcg.is/1SgsHqk to find the names and direct contact information for your local biologists, or call the regional office in your area:
  - Region 1 – Eastern: 509-892-1001
  - Region 2 – North Central: 509-754-4624
  - Region 3 – South Central: 509-575-2740
  - Region 4 – North Puget Sound: 425-775-1311
  - Region 5 – Southwest: 360-696-6211
  - Region 6 – Coastal: 360-249-4628
- Salmon Recovery Lead Entities or Regional Fisheries Enhancement Groups
- Tribal natural resource departments
- Local Conservation Districts



4.4. Suggested Restoration Practices

The following section provides a series of suggested restoration practices promoted by WDFW, other state and federal agencies, and conservation partners. We encourage consideration of these activities and others within and adjacent to the RMZ, as delineated in accordance with our recommendations in Chapter 2. Further, it is not unusual to find other types of Priority Habitats (e.g., wetlands, shrub-steppe) adjacent to riparian areas. In such cases, restoration practices should not degrade or disturb the adjacent habitat, but rather—if feasible—improve it in addition to improving the riparian habitat. The same approach should be used where riparian-adjacent Priority Species areas are present.

Like most restoration practices, the ones recommended below can range in complexity, both biologically and technically, so landowners are strongly encouraged to seek technical assistance from WDFW and other experts before taking any action: This will help save money, time, and greatly increase the likelihood of success for any restoration activity. Landowners should also be aware that many of these activities may require permits[11,12] issued by one or more

11 The Governor's ORIA Office provides additional assistance for general permitting questions (https://www.oria.wa.gov/site/alias__oria/347/Permitting.aspx)
12 Larger projects may also trigger permit requirements with federal agencies, such as the U.S. Army Corps of Engineers (USACE).

agencies such as WDFW for the Hydraulic Code rules, and DNR for the Forest Practices rules; as well as permits from the local jurisdiction.



Cooperative riparian enhancement project led by the Lower Columbia Fish Enhancement Group along the Toutle River, Cowlitz County/Josh Nicholas, WDFW

1. Improve quality of vegetation for both aquatic and terrestrial wildlife by removing invasive species wherever present. Further, to avoid the likely return of invasive species, cleared areas should be replaced with native riparian vegetation: specifically, native vegetation that provides needed ecosystem functions as described in Volume 1 and throughout this document (e.g., shade, large wood, pollution removal).

2. Where riparian areas already possess some native vegetation, enhance them with a greater mixture of native plants that provide necessary habitat components (forage, cover, breeding, roosting, etc.) for a diversity of species and multiple riparian functions (e.g., streambank stability, wood recruitment, organic litter input, and pollutant removal). The specific mix of vegetation will vary by ecoregion and local needs, but likely includes conifers, grasses, and herbaceous plants.

3. Increase off-channel habitat and improve natural flow regimes by removing dikes or levees and restoring access to and within the floodplain.

4. In areas of incised channels, reintroduce beaver or construct beaver dam surrogates to store sediments, raise streambed elevation, raise water table elevation, and restore riparian vegetation.

5. Remove reed canary grass, which can greatly inhibit channel morphology and aquatic species movement. (Management techniques for reed canary grass vary and are often site-specific: contact your local WDFW regional habitat biologist for technical assistance.)

6. Through proper consultation with WDFW and tribal biologists, increase the presence of large wood in streams and rivers to improve habitat for salmon, resident fish species, and aquatic amphibians.

7. Increase connectivity through removal of non-fish passing culverts. If replacement culverts are needed, ensure they are adequately sized and climate-change-resilient; see WDFW's online resource on Incorporating Climate Change into the Design of Water Crossing Structures (Wilhere et al. 2016).

8. Reduce soil erosion by increasing vegetation complexity and density, excluding (or substantially minimizing) soil compacting activities, and implementing upland soil management techniques where applicable.

9. For agricultural operators: add and/or improve fencing structures to increase the amount of riparian area acreage from which livestock are excluded to reduce compaction, erosion, and overgrazing.

Chapter 5. Improving Protection Through Adaptive Management

5.1. Introduction

Adaptive management is widely recognized as an essential component of effective natural resource management because it provides a systematic process for continually improving policies and management through outcome-based learning. The adaptive management process is a continual cycle of planning, acting, monitoring, evaluating, and adjusting (Figure 5.1). This feedback loop provides information for making adjustments that focus on improving decisions in all phases of resource management. The utility of adaptive management programs should be considered by conservation practitioners, landowners, and land use planners to ensure that conservation actions achieve desired outcomes: in the case of this document, that means preserving, protecting, and restoring healthy, intact, and fully functioning riparian areas. In addition to improving ecosystem outcomes, adaptive management should improve clarity of regulations–resulting in increased transparency to all stakeholders.

All cities and counties are currently protecting critical areas, including riparian ecosystems, through a variety of regulatory and non-regulatory mechanisms. One regulatory challenge is understanding how well these mechanisms meet their intent of protecting ecosystem functions and values and how to make improvements where they are falling short. This chapter was written in collaboration with the Washington Department of Commerce (Commerce) and relies heavily on the Commerce's 2018 update of the Critical Areas Ordinance Handbook (Bonlender 2018), with one exception, as noted.

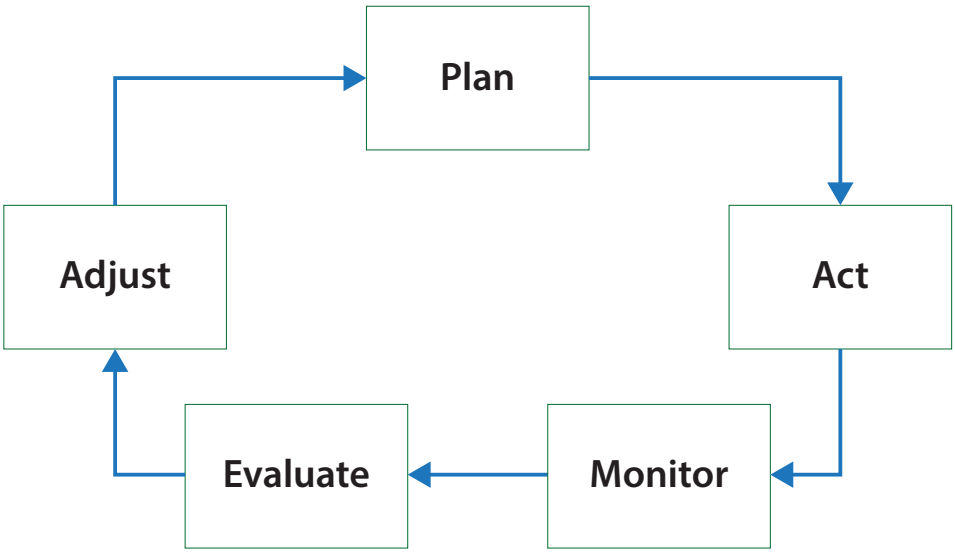


Figure 5.1. A simple depiction of the adaptive management cycle (modified from Bormann et al. 1994).

The process for monitoring we describe here supports both local and larger-scale actions that improve our collective efforts to protect riparian ecosystems throughout the state. For example, the Puget Sound Partnership (Partnership) uses "Vital Signs" of ecosystem health and recovery, such as riparian forest cover, to understand ecosystem condition, articulate shared goals and progress, and inspire action towards meeting those goals.

Adopting an adaptive management program can allow local governments to respond more quickly and meaningfully as new information become available. A willingness to address issues identified through this process is critical to the idea of adaptive management.

5.2. Common Questions Addressed by Adaptive Management

Adaptive management does not have to be expensive or complicated to be useful. We believe local jurisdictions can maximize their investment in adaptive management by focusing on two types of monitoring related to their own regulatory process (explained in more detail in the next section).

We begin by discussing three basic types of monitoring because we have found it instructive to understand how different monitoring types can be hierarchically or sequentially staged, based on the types of questions they seek to answer: implementation monitoring[13], effectiveness monitoring , and validation monitoring.

5.2.1. Implementation Monitoring

Implementation monitoring typically helps the permit issuer (permittor) answer the following questions about its permitting system, by looking at the outcomes of individual permits:

- Are permits consistent with regulations?
- Do permits contain all necessary conditions or provisions for a project?
- Does the permittor issue consistent permits (same requirements) for all permittees?

Implementation monitoring can also include:

- Permit *compliance monitoring,* which asks if the permitte followed or complied with each permit condition or provision and refrained from conducting unpermitted activities. Compliance monitoring usually takes place very soon after completion of permitted work.
- Keeping track of unpermitted activities; that is, finding changes in land use or management that require a permit but where no permit of any kind was issued.

13 As explained further in Section 5.2.2, we describe and use the term effectiveness monitoring somewhat differently than how it is described in Commerce's 2018 Critical Areas Handbook.



Fast-growing alder trees, like these shown in a low area along the Methow River in Okanogan County, can improve bank stability and increase summer shade more quickly than most conifers./Scott Fitkin, WDFW

5.2.2. Effectiveness Monitoring

In Commerce's 2018 Critical Areas Handbook, effectiveness monitoring is a form of long-term implementation monitoring. In other words, effectiveness monitoring looks at permit compliance as a while to determine whether permit conditions/provisions (e.g., buffer widths) are followed over time.

For the purposes of this document, we describe effectiveness monitoring a bit differently: Specifically, effectiveness monitoring is a way to determine whether permit conditions/provisions are working relative to intended environmental outcomes. For example, "Are permit conditions/provisions leading to the riparian function(s) (e.g., shade, bank stability) that they were intended to provide?" Effectiveness monitoring typically involves some on-the-ground measurement of environmental variables affected by land use activities.

5.2.3. Validation Monitoring

Research within the adaptive management framework is often referred to as validation monitoring. In the context of land use regulations, the questions relate to how management of critical areas (e.g., riparian) affects the specific environmental resource it was intended to protect (e.g., water quality, salmon). Validation monitoring may be beyond the fiscal means of most local governments. Moreover, it often involves questions that must be addressed over large spatial extents (e.g., at watershed or multi-watershed scale). In comparison, implementation and effectiveness monitoring are often tied to local jurisdiction's regulatory processes at the site scale: For these reasons, the next two sections focus more on these two types of monitoring.

5.3. Recommended Implementation Monitoring Efforts

We advise local governments to focus first on using implementation monitoring to evaluate their regulatory processes that affect riparian ecosystems. Implementation monitoring tracks execution of the permitting system from the perspective of both the permit issuer (permittor) and permit holder (permittee) (Figure 5.2). This effort can result in regular status reports that help demonstrate how well local governments and permittees are working together to meet resource objectives in a fair and consistent manner.

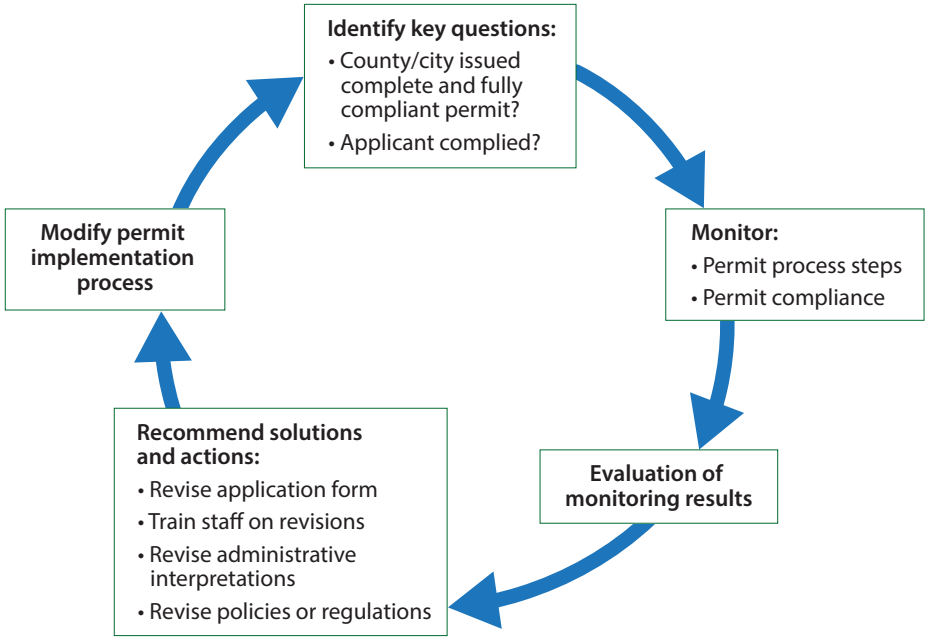


Figure 5.2. Depiction of the adaptive management cycle specific to permit compliance.

Implementation monitoring provides key information for permitting process improvement (5.2; Table 5.1). Even in situations where local governments cannot monitor all steps in their permitting process, monitoring any step—regulations to permit conditions/provisions, permit provisions to construction, construction to inspections, or inspections to enforcement—can provide valuable feedback about the quality of regulatory processes.

Monitoring does not have to be complicated. Even if a city or county chooses to do only permit implementation monitoring, this will provide key information that can improve the permit process, and an individual landowner can check whether choices like enhancing native plantings produce the desired results.

Table 5.1. Key questions for implementation monitoring during the Critical Areas permit review process.

Process Steps	Key study questions to evaluate permit implementation	Proposed metrics
Application	Was adequate information gathered from the permit applicant? Did the local government provide timely and necessary technical assistance to the permit applicant?	Number and percent of complete applications. i.e., include all information necessary to issue a permit. Number and percent by type of permit applications missing information.
Permit	Do permit provisions follow the local government code?	Number and percent of permit provisions by type consistent with code.
Permit	Do permit provision identify intent of protection and how it can be accomplished? (e.g., area of tree retention, distance of structure from stream, clearing, grading, or storm water provisions, replanting requirements, extent of impervious surface.)	Number and percent of (complete) permits (i.e., include all provisions that enable a permittee to be fully compliant with the permit). Number, percent, and type of missing provision/ information.
Permit (variance)	If a variance was granted, is the reason for the variance clearly stated?	Percent of variances by type justified by code or policy. Percent of permits with variances by type.
Permit (mitigation)	If compensatory mitigation was required, were the unavoidable impacts clearly identified/quantified? Was the rationale clearly stated?	Number and percent of permits by type with unavoidable impacts. Percent of permits by type with quantified mitigation requirements
Compliance	Post-Construction Visit: Did the permittee comply with the permit? (Requires field measurements of some or all the provisions in the permit. For riparian ecosystems, key provisions to inspect include RMZ width, retention of trees, replanting, structure distances from stream, area of impervious surface, and implementation of storm water provisions.)	Number and percent by type of provision that were out of compliance.
Enforcement	Are enforcement actions necessary to meet permit provisions and/or the regulations?	Number and percent by type of permit enforcement actions.

Because little or no fieldwork is required, the easiest and least expensive step to monitor is the link between regulations and permit provisions: that is, whether local land use regulations have been translated into permit provisions that can be understood easily by permittees. We recommend that some implementation monitoring become part of all local regulatory programs, even if it only on a relatively small subset of permits selected at random. A database for storing information on each step (i.e., a permit tracking system–see Table 5.1, Figure 5.3) is a critical tool for creating a complete system of accountability.

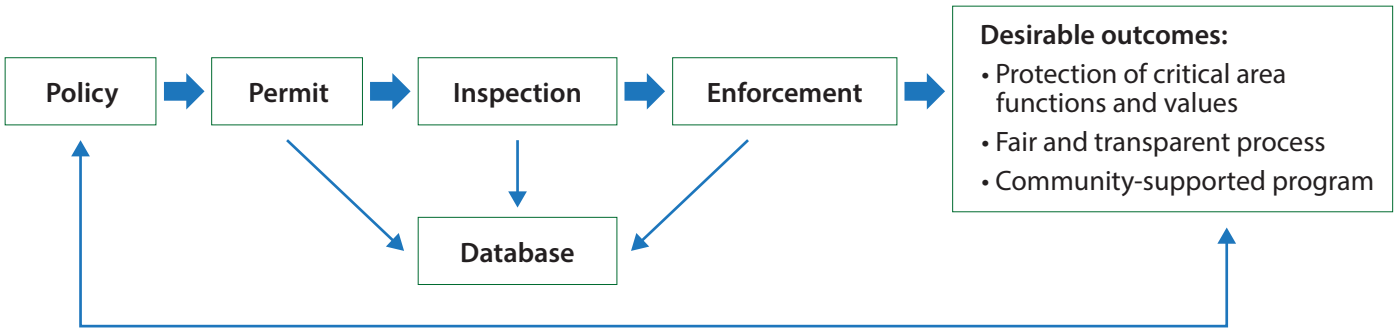


Figure 5.3. One system of permit accountability that includes implementation monitoring of internal permit processes, inspection for permit compliance, a database from which to judge outcomes, and a feedback loop connecting outcomes with policy intent.

Long-term implementation monitoring can help answer additional questions, such as: "Are rules/regulations intended to provide long-term protection of critical areas (e.g., RMZs) actually followed or maintained over time?" One way to answer this is by looking at changes in land cover, which describes the type and amount of vegetation, roads, and buildings occurring on the landscape. By comparing high quality aerial photographs taken of the same locations over time, change can be quantified and attributed to specific activities, both from natural disturbances (e.g., wildfires, river channel migration) and human activities (e.g., timber harvesting, residential subdivision construction, highway widening). In Section 5.5, we describe one such process WDFW developed and for which information for many parts of the state are already available.

5.4. Effectiveness of Regulatory Protections of Critical Areas

Where implementation monitoring has been successful, that is, either documenting a highly functional permitting process or improving poorly performing permitting process, we encourage additional effort on effectiveness monitoring. As described above, our primary goal for effectiveness monitoring would focus on understanding how well the permit conditions/provisions lead to measurable outcomes on the ground (e.g., protection/restoration of one or more riparian functions or values) over an extended period.

5.5. Using Land Cover Change to Understand Long-term Regulatory Protection

High Resolution Change Detection (HRCD) is a tool that is useful for detecting changes in two specific types of land cover (tree canopy and impervious surfaces) over set time periods. Land cover change analysis like HRCD can show jurisdictions the degree to which critical area regulations are maintaining RMZs as intended. This information can then help shape if, where, why, and how adjustments to permitting processes should occur. By combining land cover change analysis with targeted questions about permitting processes, jurisdictions can begin to adaptively manage changes to their overall regulatory system.

Adaptive Management Framework in the Voluntary Stewardship Program

The Voluntary Stewardship Program (VSP) was authorized by the Legislature in 2011 through RCW 36.70A.705. The goals of VSP are to protect and enhance critical areas where agricultural activities are conducted, maintain and improve the long-term viability of agriculture in the State of Washington, and reduce conversion of farmland to other uses. The program provides counties with an alternative approach from traditional development regulations that require protection (and encourage enhancement) of critical areas at the individual parcel scale. Instead, VSP relies upon voluntary practices and incentive programs to protect (and enhance) at a watershed scale. Counties "opted-in" to VSP, and as of 2019, 27 of the state's 39 counties are participating.

Under VSP, local workgroups created work plans that include benchmarks for protection and enhancement of critical areas designed to be achieved through voluntary and incentive-based actions. VSP requires monitoring and adaptive management to maintain and enhance critical areas, including riparian ecosystems, and directs workgroups to monitor at the watershed or sub-watershed scale. Key requirements for county-level programs include:

1. Establishing a durable system to track and report goals, benchmarks, and performance metrics.
2. Developing implementation and effectiveness monitoring programs and conducting monitoring on a pre-determined schedule.
3. Establishing an adaptive management program with (a) "triggers"; (b) subsequent actions to take; and (c) a process to review/update both the triggers and actions over time.
4. Reporting on the achievement of protection and enhancement goals and benchmarks at specified intervals.

Numerous counties have utilized WDFW's recommended VSP Adaptive Management Matrix in approved VSP Work Plans. Examples include:

- Chelan County, Appendix I (Approved April 2017)
- Grant County, Tables 5-7 through 5-10 (Approved June 2017)
- Asotin County, Tables 5-3 through 5-5 (Approved May 2018)
- Okanogan County, Chapter 6 (Approved September 2018)
- Spokane County, Section 4 (Approved November 2018)

Jurisdictions can adapt matrices as templates for connecting goals, benchmarks, performance metrics, monitoring, and adaptive management for other uses beyond VSP. These matrices can be modified as frameworks to identify specific elements of any adaptive management plan.

The example in the following section is adapted from Commerce's Critical Areas Handbook (Bonlender 2018). Chapter 7 of that document provides a number of similar monitoring program examples, nearly all of which were developed by cities or counties.

5.5.1. Example: WDFW/Thurston County Shoreline Master Program

In 2015, Thurston County and WDFW utilized a National Estuary Program grant to quantify shoreline vegetation, land cover change, and evaluate land use permit compliance. Specifically, Thurston County used WDFW's HRCD data to monitor compliance within the County's Shoreline Master Program (SMP) jurisdiction. This project developed a protocol manual for using HRCD for this purpose, available to all jurisdictions within the Puget Sound region.

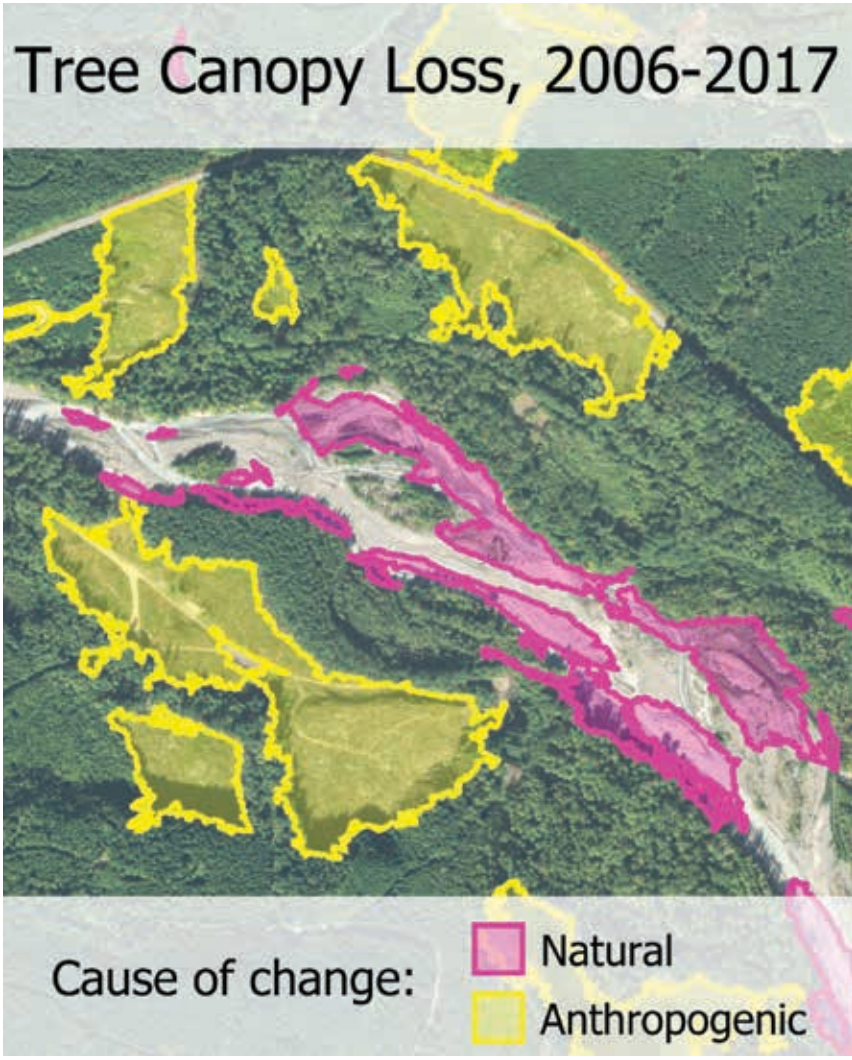
One goal of the pilot project was to answer several related sets of questions:

For Thurston County:

- What land cover change is happening within designated SMP areas? What change is happening throughout the Deschutes River watershed (WRIA 13)?
- How does change known by permit records compare with detected changes by HRCD?
- What changes, if any, can be made to the land use permits or permitting process that could increase the relevancy or efficacy in utilizing the HRCD in compliance monitoring?

For WDFW:

- How well can HRCD detect changes relative to land use permit records?
- Using Thurston County's SMP area as an example test area, what land cover changes are happening which HRCD is not capturing?
- With the development of a HRCD user manual, can HRCD be successfully utilized by other entities in the absence of direct assistance by WDFW?



High Resolution Change Detection (HRCD) analysis showing changes in tree canopy along and above a river in Thurston County. Pink polygons show where trees that existed prior to 2017 are no longer standing, apparently due to natural causes (e.g., where the river meandered). Yellow polygons show places where trees were removed as a result of timber harvesting./HRCD team, WDFW

The pilot quantified increases in impervious surfaces and decrease in tree canopy within marine areas of the SMP jurisdiction and checked for relevant permits issued. It consisted of five phases:

Phase 1: Initial SMP Change Analysis: Staff from WDFW's Habitat Program and the County's Long-Range Planning Department intersected the HRCD dataset with the County's SMP area and tax parcel data within ArcGIS for three time periods of HRCD availability (2006 to 2009, 2009 to 2011, and 2011 to 2013). Staff compared known areas of change to those locations with the county's land use permit records to find locations of observed change via HRCD without any permit record. During this phase, land cover change statistics were also produced, including total area of change and discrete occurrences of land cover change events.

Phase 2: Learning What the HRCD Misses: Using the SMP area in the County, WDFW staff manually looked for land cover changes not captured by the HRCD analysis, to understand how accurate HRCD was in capturing all land cover change situations (rates of omission error).

Phase 3: Developing a Standardized Method for Utilizing the HRCD: A major goal of this project was to develop support materials for others to be able to utilize HRCD to answer land use management questions independent of WDFW staff assistance. Using lessons learned in Phases 1 and 2, WDFW and the County agreed upon a recommended method for applying HRCD to a specific management question, and collaboratively developed a "how-to" manual. In this phase, WDFW staff also developed a web-based service (https://hrcd-wdfw.hub.arcgis.com) where users can download the HRCD dataset, detail the methodology of HRCD construction, find WDFW contact information, and more.

Phase 4: Testing the Manual through Remaining SMP Analysis in WRIA 13: Using only the HRCD dataset and the manual produced in Phase 3, County staff examined land cover change within the remaining SMP areas within WRIA 13 successfully for the same three time periods that HRCD data was available and utilized in the earlier phase.

Phase 5: Training and Outreach: With the lessons learned and products derived from Phases 1 through 4 of the project, staff worked in conjunction with the Coastal Training Program, managed by Ecology, to develop and deliver a workshop for planning staff within other state agencies, local governments, and some non-governmental organizations. WDFW also used this opportunity to train internal staff on the benefits, limitations, and uses of HRCD.

The evaluators analyzed land cover change within Thurston County's SMP area between 2006 and 2013, pulling permit records from timeframes that corresponded with the available HRCD datasets. The project's findings were very helpful, not only because of the information collected, but also in providing proof of concept for several of the steps/tools. For example: The utility of HRCD in analyzing patterns of land cover change in a specific geographic area of concern were well demonstrated. The HRCD analysis found that, from 2006 to 2013, less than half of one percent (0.39%) of the riparian area contained within the SMP had land cover change – approximately two-thirds of this was due to canopy loss, with one-third due to new impervious surfaces. The HRCD analysis did not find any permitted developments that were out of compliance, though it did find unpermitted events (e.g., tree removal) in each time period studied.

Furthermore, the HRCD dataset proved to be relatively simple to use. With the development of standard application methods, Thurston County was able to complete an analysis of their remaining SMP area without any further assistance from WDFW.

On the flip side, Thurston County found that comparing actual permit compliance with HRCD data was "tedious and difficult" because of limitations with the county's permit tracking database. For example, in many cases, land use permits did not include enough information to determine conclusively that a parcel with observed change via HRCD was out of compliance or determine that the parcel had a permit record during the study's timeframe in question.

Local governments can use HRCD analysis at the start to find land cover changes that are otherwise unknown; as they begin to understand patterns, HRCD analysis provides indications to identify locations that warrant closer investigation through other methods.

5.6. Conclusion

Implementation and effectiveness monitoring are important parts of adaptive management and can be undertaken relatively easily by local governments. Many of our riparian ecosystems are already degraded and stressed, so it is worth our while to investigate whether the actions put in place to protect them are being carried out as required and leading to the specific environmental responses that were intended. This is now more important than ever, because in spite of advances in science and efforts to improve regulatory processes, climate change and population pressures are increasingly confronting many parts of the state. Using monitoring and adaptive management to track successes and failures and then learning from both will make our challenges easier to overcome.



To install the lawn seen on the right of this photo, all vegetation was removed from the riparian area except a single row of cottonwood trees at the water's edge./Jennifer Nelson, WDFW

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Riparian area below the south slope of Mt. St. Helens. The area is still recovering from the mountain's volcanic eruption in May 1980. Skamania County/Brendan O'Doherty

Glossary of Terms

Active channel: The active channel is defined by the lower limit of continuous riparian vegetation (Naiman et al. 1998) and may be delineated by absence of both moss on rocks and rooted vegetation (USFS 2008). The upper most elevation of the active channel is sometimes equated with the ordinary high-water mark.

Active floodplain: Located between the active channel and adjacent terrace or hillslopes (Fetherston et al. 1995; Harris 1987). Depending on the watershed, the flood return interval of the active floodplain varies between 1 and 10 years (Wolman and Leopold 1957; Ward and Stanford 1995; Lichvar et al. 2006; Williams et al. 2009; BLM 2015).

Adaptive management: The systematic acquisition and application of reliable information to improve management over time. It often includes treating management decisions as experiments in order to address critical uncertainties and learn more quickly from experience. It involves setting objectives, monitoring conditions, and adjusting management based on results. Hallmarks of a sound adaptive management program include: (1) adequate funding for monitoring and research, (2) a willingness to change course when pre-established triggers are reached, and (3) a commitment to gather data and evaluate conditions at appropriate spatial extents and time scales. See Ecosystem-based management and WAC 365-195-920(2).

Anadromous fisheries: The commercial, recreational or subsistence harvest of fish that are born in freshwater, rear at sea, and return to freshwater to spawn. Anadromous fisheries of Washington include salmon (Chinook, coho, chum, sockeye, and pink), steelhead, bull trout, coastal cutthroat trout, green sturgeon, white sturgeon, eulachon, longfin smelt, and Pacific lamprey.

Aquatic species: Wildlife species that live in marine or freshwater including fish, shellfish (e.g., clams, snails, mussels), amphibians (e.g., frogs, salamanders), reptiles (e.g., turtles), crustaceans (e.g., crayfish), insects (e.g., larval mayflies, stoneflies, caddisflies, dragonflies) and various other invertebrates.

Best Available Science: Information produced through a valid scientific process that WDFW or another local, state or federal agency has determined represents the best available science consistent with criteria set out in WAC 365-195-900 through 365-195-925. (Volume 1 of this document is an example of Best Available Science regarding riparian ecosystems.)

Biota: The animal and plant life of a region, habitat, or geological period.

Buffer: The area around a critical area that separates the critical area from incompatible uses. For example, a 200m buffer may be established around a heron-nesting colony (the critical area) to keep suburban land uses from disrupting the colony. See WAC 365-190-130(3)(a). Riparian ecosystems are both buffers (for instream habitat) and critical areas on their own merit.

Channel Migration Zone: The area within which a river channel is likely to migrate and occupy over a specified time period (e.g., 100 years).

Channel slope or gradient: The average steepness of a stream segment measured as its change in elevation divided by its length. Typically, a segment's gradient is considered low if less than 2%, moderate between 2% and 4%, and high if greater than 4%.

Classification (critical area): Defining categories to which critical areas are assigned. The Priority Habitats and Species (PHS) program provides WDFW's recommended classification scheme for Fish and Wildlife Habitat Conservation Areas. Classification precedes designation in counties' and cities' effort to protect critical areas. *See* WAC 365-190-040(4).

Complexity: The complicated state seen in dynamic environments that contain multiple components and processes that interact with one another in a web of interactions whose outcomes are often unpredictable. Complexity can be described with conceptual models; outcomes of well-understood complex phenomena can be partially predicted using computer models.

Connectivity: Landscape connectivity is the physical relationship between landscape elements. Functional connectivity describes the degree to which landscapes facilitate or impede the movement of organisms between areas of habitat.

Critical Aquifer Recharge Area: Areas with an essential recharging effect on aquifers used for potable water. One of five types of Critical Areas identified in the Growth Management Act.

Critical Area(s): Places that the Growth Management Act requires all counties and cities to designate and protect, specifically, (1) Wetlands; (2) Critical Aquifer Recharge Areas; (3) Fish and Wildlife Habitat Conservation Areas (e.g., Riparian Management Zones); (4) Frequently Flooded Areas; and (5) Geologically Hazardous Areas. In developing policies and regulations to protect the functions and values of critical areas, counties and cities are required to include best available science and give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries. *See* RCW 36.70A.172(1). The presence of a critical area may limit some land development options. *See* WAC 365-190-040(6).

Delineation (critical area): The act of applying definitions or performance standards in the field to identify the boundary of a critical area.

Designation (critical area): Assigning critical areas into established categories and specifying their general distribution, location, and extent. Designation can be made by maps (which are useful for public awareness and for identifying if a proposal may affect a critical area) and by performance standards or definitions (which allow for specific identification and site-scale delineation during permit review). WDFW's Priority Habitats and Species (PHS) program provides the agency's recommended designation maps and performance standards/definitions for Fish and Wildlife Habitat Conservation Areas. Designation occurs after classification in counties' and cities' efforts to protect critical areas. *See* WAC 365-190-040(5).

Disturbance regime: The frequency, magnitude, and duration of disturbance events.

Disturbance: A pronounced, temporary change in environmental conditions within an ecosystem. Disturbances often act quickly and can alter ecosystem composition, structure, and function.

Ecological (biological) **integrity:** Ability of an ecological system to support and maintain a community of organism that has species composition, diversity, and functional organization comparable to those of natural habitats within a region. An ecological system has integrity when its dominant ecological characteristics (composition, structure, function, and processes) occur within their historical ranges of natural variability. See Historical condition and Range of natural variability.

Ecosystem(s): A spatially explicit unit of the Earth that includes all the organisms, along with all components of the abiotic (chemical and physical) environment. Ecosystems have composition, structure, and functions.

Ecosystem composition (or ecological composition): All living (biotic) and nonliving parts of an ecosystem.

Ecosystem function(ing) (or ecological function): (1) The process or cause and effect relationship underlying two or more interacting components, e.g., terrestrial plant material as food/substrate for aquatic invertebrates. (2) The sum of processes that sustain the system. (3) The capacity of natural processes and components to provide goods and services that satisfy human needs, either directly or indirectly. Ecosystem functions can be conceived as a subset of ecological processes (See *Ecosystem process*).

Ecosystem process (or ecological process): Interactions among components of an ecosystem, biotic (living organisms) and abiotic (chemical and physical) components. Many processes involve transfer, conversion, or storage of matter or energy (See *Ecosystem process*).

Ecosystem structure (or ecological structure): The arrangement of and relations among the parts or elements (components) of an ecosystem.

Ecosystem-based management (EBM): Management driven by explicit goals; executed by policies, protocols, and practices; and made adaptable by monitoring and research; based on our best understanding of the ecological interactions and processes necessary to sustain ecosystem composition, structure, and function. EBM acknowledges that humans are an important ecosystem component and focuses on managing human activities within ecosystems. EBM often involves balancing ecological, economic, and social objectives within the context of existing laws and policies.

Enhance: To improve a critical area's existing ecosystem processes, structure, and/or functions so that its ecological integrity is more like its historical condition.

Erosion: The loosening and transport of soil particles and other sediment by water. Terrestrial erosion includes raindrop splash erosion, overland flow sheet erosion, surface flow rill (shallow) and gully (deeper) erosion. Channel erosion includes streambank erosion and channel incision (gouging). Rill and gully erosion diminish the ability of the riparian area to trap sediment and pollutants and can often be avoided with intact riparian vegetation.

Fish and Wildlife Habitat Conservation Areas (FWHCA): A type of Critical Area specified in the Growth Management Act. The intent of FWHCAs are to maintain populations of species in suitable habitats within their natural geographic distribution so that (1) the habitat available is sufficient to support viable populations over the long term, and (2)

isolated subpopulations are not created. FWHCAs come in a variety of types including waters of the state, places with which listed species have a primary association, habitats and species of local importance, and riparian ecosystems. See WAC 365-190-130.

Flow regime (stream): The distribution of stream flow through space and time. Flow regimes can be described by their magnitude (e.g., mean annual, hourly maximum), timing, frequency or return periodicity, duration, spatial distribution, and rate of change. The pathways that water takes to reach a stream (e.g., surface runoff) and within a stream exert a strong influence on the flow regime.

Function: Physical, chemical, or biological processes that occur within an ecosystem. WAC 365-196-830 says, "Functions are the conditions and processes that support the ecosystem. Conditions and processes operate on varying geographic scales ranging from site-specific to watershed and even regional scales." See also *Ecosystem function(ing)* and *Ecosystem process.*

Habitat: The resources and conditions presented in an area that support the functional needs of a species (e.g., hiding, migration, resting, feeding, breeding, and rearing), and which are necessary for its survival and reproduction. Habitat is species-specific, scale dependent, and more than vegetation composition or structure.

Hazard Tree: A tree that a jurisdiction's building official or other recognized professional (e.g., certified arborist, registered landscape architect, or certified forester) has determined poses a near-term hazard to public safety or to an existing permanent structure or public utility.

Herbaceous: Non-woody plants such as grasses and ferns.

Historical condition: *See* Ecological integrity and Range of natural variability.

Hydrology: Description of the properties, distribution, movement, and storage of water on and below the Earth's surface.

Impervious surface: Ground surfaces that resist or prevent water infiltration, e.g., roofs of houses, roadways.

Imputed: Estimated; a value assigned to missing data by inference from the values of data within the same dataset.

Infiltration: The rate or process by which water on the ground enters the soil.

Instream: Within flowing freshwater; also, the area waterward of the Ordinary High-Water Mark.

Large Woody Debris: Large dead woody material (such as fallen trees and branches) in various stages of decomposition that provide nutrient capital to forest and aquatic resources and serve as habitat in forest and riparian ecosystems. Large wood is usually defined as having diameter greater than 4 in (10 cm) and length greater than 6 ft (≈ 2 m).

Low Impact Development (LID): A storm water and land-use management strategy that tries to mimic natural hydrologic conditions by emphasizing pre-disturbance hydrologic processes of infiltration, filtration, storage, evaporation, and transpiration.

Mitigation: General category of measures that a proponent may take to avoid, minimize, and compensate for impacts.

Mitigation sequence: The stepwise process of protecting a critical area through, first (1) avoiding harm to the critical area to the maximum extent practicable, then (2) minimizing unavoidable harm to the maximum extent practicable, and finally (3) providing compensation for all unavoidable harm by restoring, creating, enhancing, or preserving the critical area's ecological functions and values to replace those impacted or lost through permitted activities.

Monitoring: The process of observing and checking the progress or quality environmental conditions for the purposes of adaptive management. Often described as having three types – implementation, effectiveness, and validation.

Morphology (stream channel, aka fluvial geomorphology): A stream channel's shape and how it changes over time. Channel morphology is influenced by the abundance and variation in sediment sources, the ability of water to transport sediment downstream, and interactions of sediment with riparian vegetation and woody debris.

Off-Channel Habitat: Overflow channels, sloughs, alcoves, wetlands, and small streams found within the floodplains of larger river channels. Off-channel habitat consists of waters connected to and draining into rivers and streams by inundation during peak flow events (Smith 2005; WAC 222-16-031). Off-channel habitat provides habitat for salmonids and other aquatic species which often afford (1) spawning habitat that does not experience scouring high flows; and (2) summer rearing habitat that does not experience loss of stream flow.

Ordinary High Water Mark (OHWM): (1) That mark that will be found by examining the bed and banks and ascertaining where the presence and action of waters are so common and usual, and so long continued in all ordinary years, as to mark upon the soil a character distinct from that of the abutting upland (Washington Department of Ecology 2016). (2) That line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas (U.S. Army Corps of Engineers, 2014).

Organic litter: Plant, leaf, tree, or soil litter, and duff are dead plant materials that have fallen to the ground. In this document, organic litter is referenced as available for contributions to the stream system.

Passive Restoration: Allowing natural succession to occur in an ecosystem after removing a source of disturbance.

Population viability (local): The likelihood that a population of a species will persist for some length of time.

Precautionary principle: Erring on the side of not harming resources when faced with uncertainty, especially for potential harm that is essentially irreversible. Utilizing a precautionary approach in land use planning involves: (1) taking preventive action (avoiding impacts); (2) shifting the burden of proof to the project proponents; (3) exploring a wide range of potential alternatives; and/or (4) including multiple stakeholders and disciplines in decision making.

Priority Area: The area within a Priority Species' natural geographic distribution within which protective measures and/or management actions are needed to (1) support viable populations over the long term and (2) avoid creating isolated subpopulations.

Priority Habitat: A State of Washington habitat type with unique or significant value to many species; an area with one or more of the following attributes: (1) comparatively high fish and wildlife density; (2) comparatively high species diversity; (3) important breeding habitat; (4) important seasonal ranges; (5) important movement corridors; (6) limited availability; (7) high vulnerability to habitat alteration; or (8) unique or dependent species. Examples of Priority Habitats include but are not limited to instream, riparian, shrub steppe, Oregon white oak woodlands, freshwater wetlands, and marine nearshore.

Priority Habitats & Species (PHS): WDFW's primary means of transferring fish and wildlife information from resource experts to local governments, landowners, and others for the protection of fish, wildlife, and habitat. Includes endangered, threatened, sensitive, candidate, and vulnerable species and habitats deemed priorities of WDFW and reflective of best available science. See WAC 365-190-130.

Priority Species: A State of Washington fish or wildlife species requiring protective measures and/or management actions to ensure its survival. A Priority Species fits one or more of the following criteria: (1) is a state-listed endangered, threatened, sensitive, or candidate species, (2) has vulnerable aggregations, or (3) is of recreational, commercial, and/or tribal importance. Examples of Priority Species include but are not limited to steelhead/rainbow trout, bull trout/Dolly Varden, great blue heron, cavity-nesting ducks, sage grouse, fisher, orca, and elk.

Process: See *Ecosystem process.*

Protect: To prevent the degradation of existing ecosystem functions and values.

Range of natural variability (or Historical range of natural variability): Refers to the range of ecological conditions (components, structures and functions) in a time period before widespread anthropogenic changes.

Recruitment (wood): The process of wood moving from a riparian area to the stream channel. Sources of recruitment include bank erosion, windthrow, landslides, debris flows, snow avalanches, and tree mortality due to, for example, fire, ice storms, beavers, insects, or disease. Dominant factors include, but are not limited to, channel width, slope steepness, slope stability, forest composition and structure, and local wind patterns.

Refugia (singular Refugium): sites to which biota retreat, persist in and potentially expand from under changing environmental conditions (Keppel et al. 2012).

Riparian: An adjective meaning alongside a waterbody: stream, river, lake, pond, bay, sea, and ocean. Riparian areas are sometimes referred to by different names: riparian ecosystems, riparian habitats, riparian corridors, or riparian zones. Depending on the contexts, these terms may have somewhat different meanings.

Riparian area: A defined area encompassing both sides of a water body, composed of aquatic ecosystems (i.e., the river or stream), riparian ecosystem, and riverine wetlands. Riparian areas are three dimensional: longitudinal up and down streams, lateral to the width of the riparian ecosystem, and vertical from below the water table to above the canopy of mature site-potential trees (NRC 2002).

Riparian buffer: Buffer refers to its purpose, which is to reduce or prevent adverse impacts to water quality, fisheries, and aquatic biodiversity from human activities occurring upslope of the buffer. Riparian buffers managed specifically for pollutant removal may also be called a vegetated filter strip.

Riparian ecosystem: Riparian areas are transitional between terrestrial and aquatic ecosystems and distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. They include those portions of the ecosystem distinguished by gradients (i.e., riparian zones) and portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., the Zone of Influence). Our definition of riparian ecosystem does not include adjacent waters (i.e., rivers or streams, but does include riverine wetlands) and recognizes the riparian zone as a distinctive area within riparian ecosystems.

Riparian Management Zone: A delineable area defined in a land use regulation; often synonymous with riparian buffer. For the purposes of this document, we define the RMZ as the area that has the potential to provide full riparian functions. In many forested regions of the state this area occurs within one 200-year site-potential tree height measured from the edge of the stream channel. In situations where a CMZ is present, this occurs within one site-potential tree height measured from the edges of the CMZ. In non-forest zones the RMZ is defined by the greater of the outermost point of the riparian vegetative community or the pollution removal function, at 100-feet.

Riparian values: The benefits that riparian ecosystems provide to society, including but not limited to flood damage reduction, water quality improvement, provision of harvestable populations of salmon, and provision of recreational opportunities. Riparian values have direct economic consequences to local communities through fishing opportunities, and flood and water quality protection, among others.

Riparian zone: A distinctive area within riparian ecosystems. The riparian zone contains wet or moist soils and plants adapted to growing conditions associated with periodically saturated soils. See *Riparian ecosystem.*

Risk: A situation involving exposure to danger, harm, or loss. Risk reflects the magnitude of the adverse impact and its probability of occurring. Risk is appropriately managed by applying the precautionary principle (especially for irreversible losses) and through adaptive management.

Salmonid: A family of fish comprised of salmon, trout and whitefish. Native salmonid species in Washington State include: Chinook Salmon (*Oncorhynchus tshawytscha*), Chum Salmon (*O. keta*), Coho Salmon (*O. kisutch*), Pink Salmon (*O. gorbuscha*), Sockeye Salmon/Kokanee (*O. nerka*), Steelhead/Rainbow Trout (*O. mykiss*), Cutthroat Trout (*O. clarki*), Bull Trout (*Salvelinus confluentus*), Dolly Varden (*S. malma*), Pygmy Whitefish (*Prosopium coulteri*), and Mountain Whitefish (*P. williamsoni*). This list does not include names of subspecies. (See *Anadromous* fisheries).

Site class: The classification of a site based on the productivity of its dominant tree species. Site classes vary based on local differences in soil nutrients and moisture, light and temperature regimes, and topography. Site classes are typically described as most productive (I) through least productive (V).

Site-Potential Tree Height: The average maximum height of the tallest dominant trees for a given age and site class.

Stronghold: Habitat strongholds are refugia watersheds that contain high quality habitat with depressed or weak populations. The habitat in these areas has a high to very high potential to support these species. The population level in these areas is not considered to be a function of habitat, but other factors (USFS2001).

Structure: See *Ecosystem structure.*

Succession: Ecological succession is the process by which the biological community composition recovers over time following a disturbance event.

Uncertainty (scientific): The absence of information about the state of something or a relevant variable. Sources of uncertainty include, but are not limited to natural variation (i.e., because outcomes vary in difficult-to-predict ways through time and space), model uncertainty (i.e., we do not understand how things interact with each other), systematic error (e.g., poorly designed experiments or calibrated instruments), or measurement error. See *Risk*.

Values: The level of benefits that the space, water, minerals, biota, and all other factors that make up a natural ecosystem provide to support native life forms, including humans (Cordell et al. 2005).

Vegetative filter strips: A riparian buffer designed to capture nutrients, contaminant compounds, and sediment transported by run-off. Filter strips are sometimes synonymous with riparian buffers.

Water quality: Physical, chemical, and biological characteristics of water that describe its suitability to meet human needs or habitat requirements for fish and wildlife.

Watershed processes: The fluxes of energy (e.g., sunlight, wildfire) and materials (particularly water and sediment) that interact with biota (e.g., vegetative cover, salmon, beavers, soil microbes) to form a watershed's physical features and characteristics, which give rise to its instream physical and ecological conditions. These processes occur within a context that reflects the watershed's climate, geology, topography, and existing human land use. See *Ecosystem process.*

Watershed: A land area that drains to a common waterbody.

Wetland: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support—and that under normal circumstances do support—a prevalence of vegetation typically adapted for life in saturated soil conditions. Examples include but are not limited to swamps, marshes, and bogs.

Zone of Influence: The portions of terrestrial ecosystems that significantly influence exchanges of energy (e.g., sunlight) and matter (e.g., large wood, sediment, nutrients) with aquatic ecosystems.

Appendix. Site-Potential Tree Height Mapping Tool

The Site-Potential Tree Height (SPTH) Mapping Tool helps users find information they need to conserve, protect, and restore riparian ecosystems within a project site. The SPTH mapping tool works on personal computers (PCs) and mobile devices (tablets and smartphones).

Site-Potential Tree Height Map Data

The SPTH mapping tool contains several GIS data layers, explained below:

1. Site-potential Tree Height at 200 Years ($SPTH_{200}$),
2. Imputed[14] $SPTH_{200}$ Values for Urban areas,
3. Dryland Ecosystems – No SPTH Values, and
4. Other Lands – No SPTH Values.

Site-potential Tree Height at 200 Years ($SPTH_{200}$)

WDFW derived the $SPTH_{200}$ values from forest productivity site index information using Natural Resource Conservation Service (NRCS) soil polygons and its Soil Data Viewer tool for ArcGIS. The NRCS-provided forest productivity site index values, in feet, were for ages 50 years in Western Washington and typically 100 years in Eastern Washington. WDFW determined $SPTH_{200}$ values using tree site index equations. Each soil polygon has one or more tree species records with associated $SPTH_{200}$. When multiple tree species records with associated $SPTH_{200}$ are available, WDFW recommends using the largest $SPTH_{200}$ value of the tree species historically present at the site (such trees may currently be found on the site, but also may not). For example, if a project site contains mostly red alder but Douglas-fir is present (or was present prior to modern human alterations), use the Douglas-fir $SPTH_{200}$ for that soil polygon.

Imputed $SPTH_{200}$ Values

Four large urban areas (Seattle, Spokane, Tacoma, and Bellingham) lacked NRCS soil polygons; therefore, forest productivity information could not be mapped for most locations within those areas. Similarly, numerous soil polygons labelled as "Urban Land" lacked forest productivity information. For each of these four urban areas, WDFW calculated an imputed $SPTH_{200}$ by using an area-weighted average for 200-year site index values within a two-mile buffer around the perimeter. WDFW recommends the use of this imputed $SPTH_{200}$ as a guide for delineating RMZs in these urban areas. At the time of publication, WDFW had calculated imputed $SPTH_{200}$ information for those large urban areas. WDFW expects to continue to update the map.

[14] Imputed: estimated; a value assigned to something by inference from the value of the products or processes to which it contributes.

Dryland Ecosystems and Other Lands

Not all soil polygons are forested, or have forest productivity information from NRCS; therefore, not all of them have associated $SPTH_{200}$ values. In addition, Benton, Franklin, Grant, and Adams counties had no forest productivity information in their NRCS soil polygons. These areas without $SPTH_{200}$ values were classified in one of two ways: as "dryland ecosystems", or "other lands."

- WDFW approximated the area contained within "dryland ecosystems" using the Arid Lands Initiative study area boundary (Arid Lands Initiative, 2014) and have developed associated process steps that we recommend be used to derive RMZ widths (Volume 2, Section 2.2.3).

- The "other lands" comprise the remaining soil polygons and are small and dispersed across the landscape. These polygons include the NRCS soil map unit name, if applicable, and often represent soils that do not support tree growth, such as beaches and wetlands, as well as certain types of heavily modified sites like gravel pits. Please consult with a WDFW regional habitat biologist on deriving RMZs for "other lands" and consider following a similar process for delineation in dryland ecosystems.

Using the Site-Potential Tree Height Mapping Tool

The mapping tool can be accessed from several locations:

- WDFW website (https://wdfw.wa.gov/species-habitats/at-risk/phs/recommendations),
- Washington Geospatial Open Data Portal (http://geo.wa.gov/), and
- ArcGIS Online (AGOL) (https://wdfw.maps.arcgis.com/apps/MapSeries/index.html?appid=919ea98204eb4f5fa70eca99cd5b0de1).

The mapping tool consists of the statewide map with the four riparian datasets described above; user tools; and a sidebar explaining map contents, how to use the map, and links to supporting documents.

The four riparian datasets have unique colors indicating where the information occurs.

- **Green:** Area where $SPTH_{200}$ has been calculated.
- **Orange:** Areas where $SPTH_{200}$ values have been imputed.
- **Pale brown:** Dryland ecosystems where there is no tree height information.
- **Beige:** Places for which no SPTH site index information is available.

Tribal and publicly owned/managed lands federal and tribal lands are typically subject to different riparian regulations. Tribal, federal, and state lands are displayed in shades of grey. County-owned lands are shown in lavender, and city-owned lands are light blue.

The mapping tool contains the following tools (Figure A1):

- **Zoom slider:** zoom in or out on the center of the map.
- **Address search tool:** zooms to a street address, place name, or latitude and longitude.
- **Legend:** displays the map layers currently visible. For example, map layers displayed at a site-specific scale will not appear in the legend when zoomed out to the statewide extent.
- **Home icon:** resets map to statewide extent.
- **Target icon:** allows the user to zoom directly to their current location.
- **Measurement tool:** use this to measure the distance between objects (e.g. edge of stream to another point), or to measure an area (square feet of an area surrounding a project site).
- **Basemap selector:** change the basemap to show a different view of the landscape: aerial imagery (default), topographic map, open street map, terrain with labels, and USGS national map.
- **Scale bar:** shows the scale that the map is zoomed to. At a statewide extent, the scale bar will show 0 to 60 miles. When zoomed to a scale where you can view the project area, the scale bar will show 0 to 100 feet or 200 feet.
- **Coordinates:** latitude and longitude (decimal degrees) are shown where the cursor is located on the map.
- **Panning:** move the map by placing the cursor over a desired location and dragging it to the center of the map display.

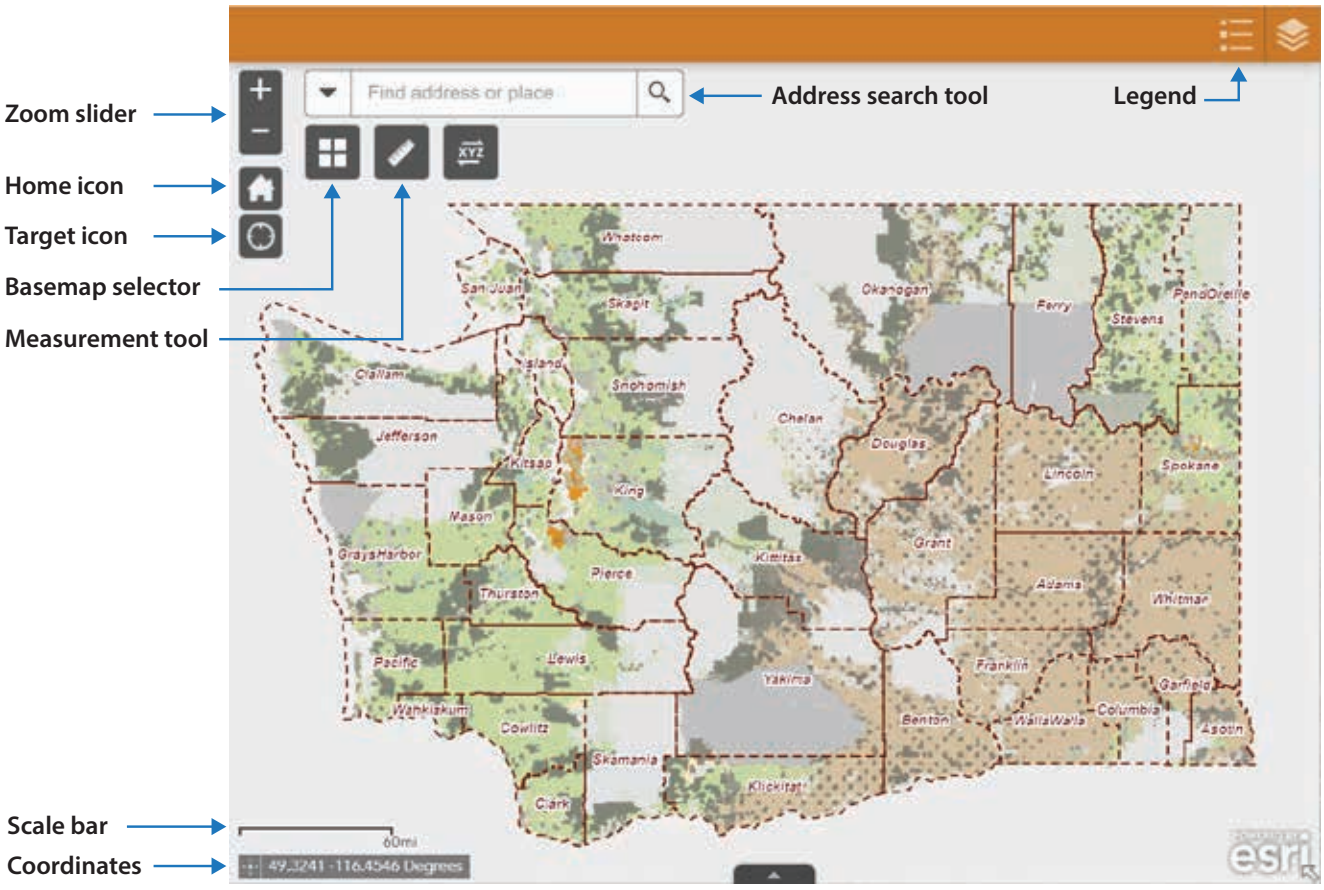


Figure A1. Tools available on the SPTH200 and RMZ Online Map.

To zoom to a site location, use the Address Search tool or use a combination of the Zoom Slider and panning. (If using the Address Search tool, select the "ArcGIS World Geocoding Service" from the dropdown menu to the left of the search field for faster results.) Once the site is located, a click (on PCs) or tap (on mobile devices) of the cursor will open a popup window with information about that location. Be sure to review each window if multiple records are selected.

The NRCS soil polygons form a complex mosaic across the landscape, so you must zoom in close enough to clearly see your project site. Clicking (or tapping, on mobile devices) on the map when it is zoomed out will result in erroneous returns of the $SPTH_{200}$ values. Below is an example of using these tools to obtain riparian information at a project site.

Mapping Tool Example #1

1. Start up the Online Map.

2. Type the project location into the Address Search tool (Figure A2). If the address is unknown, use a nearby place name or latitude and longitude. This example uses 16018 Mill Creek Boulevard, Mill Creek, Washington.

3. Select the correct address from the drop-down menu or continue to enter manually. Click (on a **PC**) or tap (on a **mobile device**) the search button. The map will zoom to that location, shown as a small blue box and a popup titled "Search result" (Figure A3).

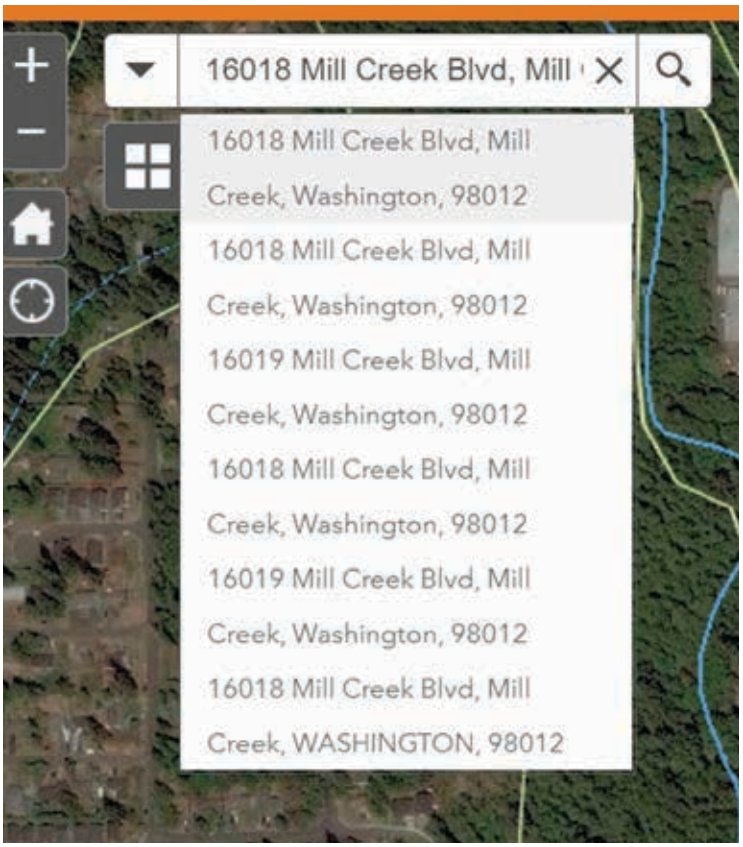


Figure A2. Using the Address Search tool.

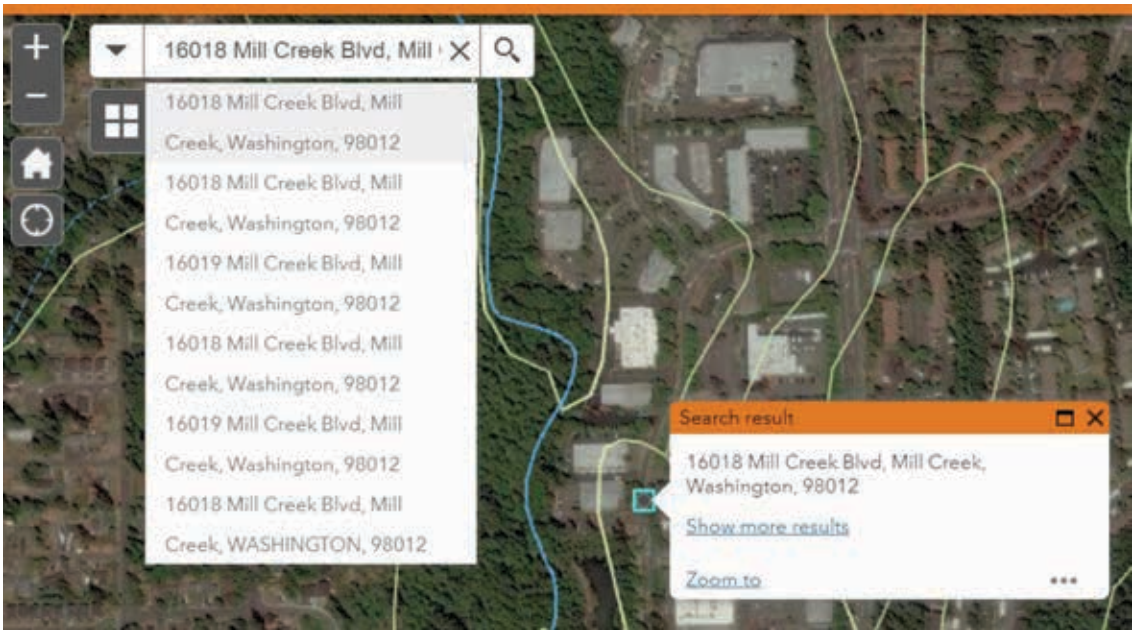


Figure A3. Zoomed in aerial image of the site address.

4. Click (or tap) on the "X" in the Address Search tool to close the popup. Zoom and pan until you can clearly see where the project site is on the landscape (Figure A4).

   In this example, the project site lies in a wooded area to the west of the address selected in the previous screen. We panned west to center the map display over the project site. In this screen, you can see outlines of the soil polygons.



Figure A4. Adjusting the map display over the project site.

5. Click (or tap) near a stream on the project site. The outline of the soil polygon selected will turn blue, and a popup window will provide information about the $SPTH_{200}$ (Figure A5). On a PC, the popup should automatically show (1) the $SPTH_{200}$ in feet, (2) the species of tree it is based on, and (3) the reference study used to derive the height value. On a mobile device, tap the arrow on the right side of the popup to display this information.

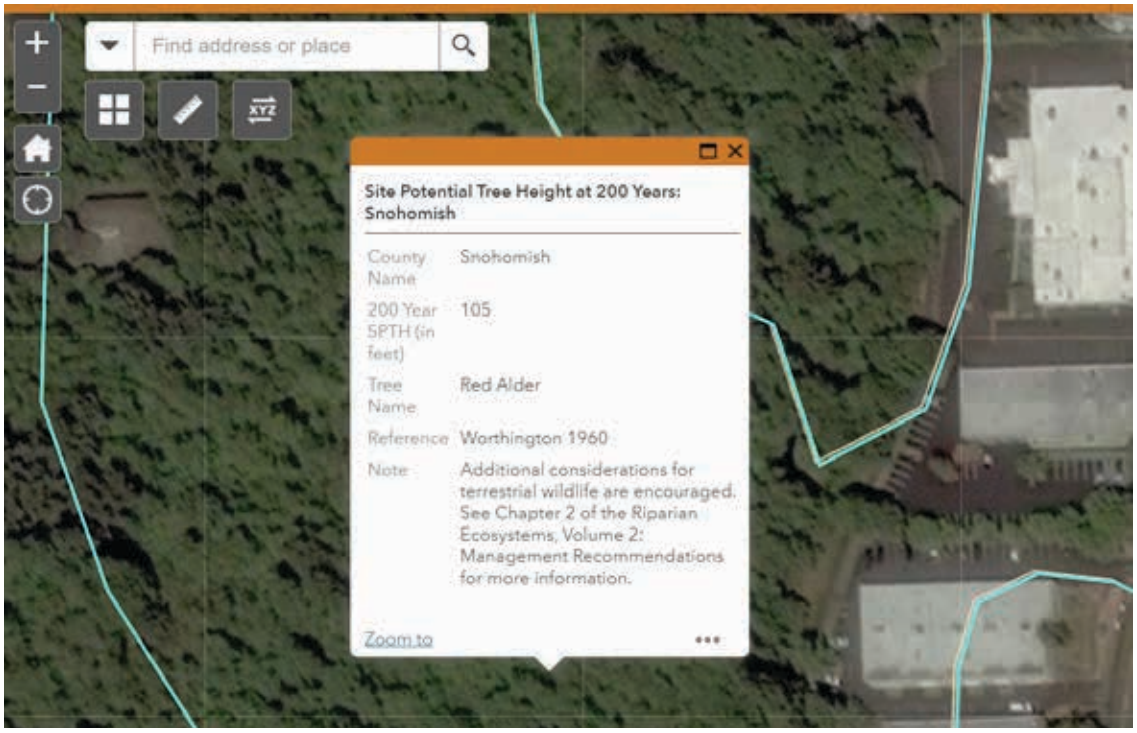


Figure A5. Bringing up the $SPTH_{200}$ information at the project site.

In Example #1, the soil polygon for the project site only showed one tree species: Red Alder. Sometimes soil polygons will list more than one tree species, as shown in Example #2.

Mapping Tool Example #2

Example #2, the project site was at a different location. Steps 1-3 in Example #1 were repeated to zoom to the project site. For this site, the popup window for the selected soil polygon looked different:

- The upper left corner of the popup window says "(1 of 2)"; and
- There is a small arrow near the upper right corner of the popup window.

This means that this soil polygon has two different associated tree species. The first is Douglas-fir (see Figure A6a).

To view the information for the second tree species, click on the small arrow. The second tree species is western hemlock (see Figure A6b).

For project locations with multiple tree species, WDFW recommends using the largest $SPTH_{200}$ value, even if the largest tree species is not the most numerous (or even currently present) onsite.

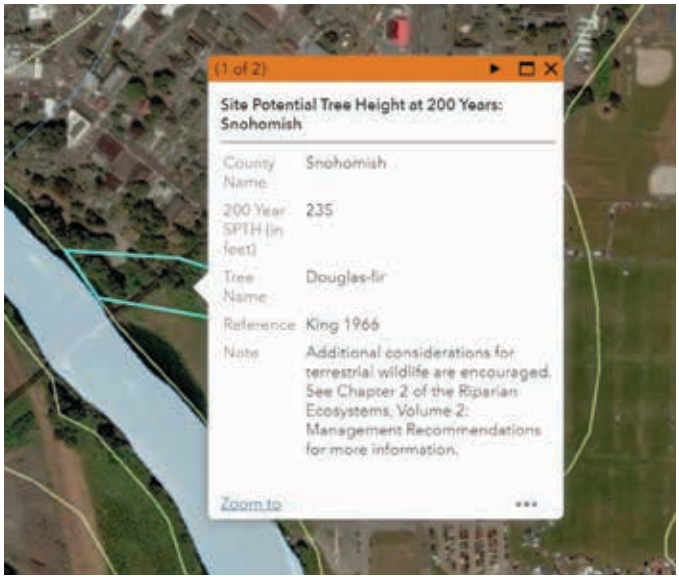


Figure A6a. SPTH information for the first of multiple tree species at a given site.

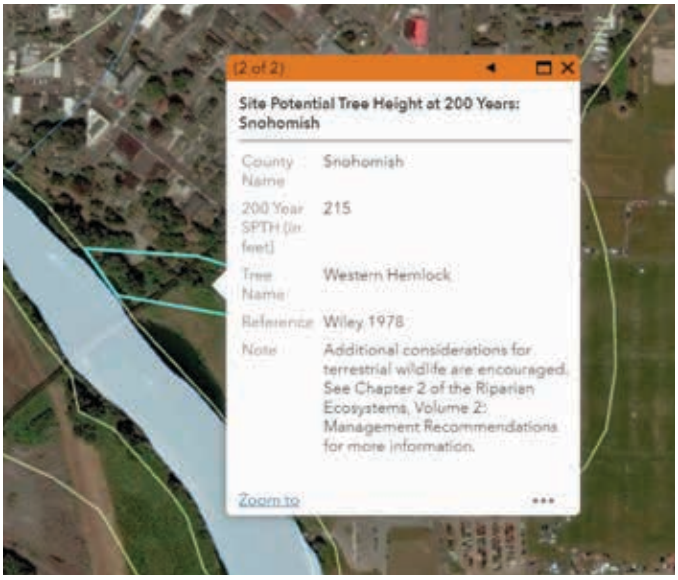


Figure A6b. SPTH$_{200}$ information for the second of multiple tree species at a given site.

Appendix References: Tree Site Index Curves

The following studies were used to determine SPTH$_{200}$ throughout the state:

Alexander, R.R. 1966. Site indexes for lodgepole pine, with corrections for stand density: instructions for field use. Research Paper RM-24. U.S., Forest Service, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado.

Alexander, R.R. 1967. Site indexes for Engelmann spruce. Research Paper RM-32. U.S., Forest Service, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado.

Baker, F.S. 1925. Aspen in the Central Rocky Mountain Region. Bulletin 1291. United States Department of Agriculture, \Washington, D.C.

Barnes, G.H. 1962. Yield of even-aged stands of western hemlock. Technical Bulletin 1273. U.S. Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.

British Columbia Forest Service (BCFS). 1977. Site index curves for cottonwood (as adapted by W.J. Sauerwein). pp. 852-853 *in* Pocket Woodland Handbook. U.S. Department of Agriculture, Soil Conservation Service, Portland, Oregon.

Cochran, P.H. 1979a. Gross yields for even-aged stands of white or Douglas-fir and white or grand fir east of the Cascades in Oregon and Washington. Research Paper PNW-263. U.S. Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.

Cochran, P.H. 1979b. Site index and height growth curves for managed, even-aged stands of Douglas-fir east of the Cascades in Oregon and Washington. Research Paper PNW-251. U.S. Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.

Cochran, P.H. 1985. Site index, height growth, normal yields, and stocking levels for larch in Oregon and Washington. Research Note PNW-424. U.S. Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.

Haig, I.T. 1932. Second-growth yield, stand, and volume tables for the western white pine type. Technical Bulletin 323. United States Department of Agriculture, Washington, D.C.

Hegyi, F., J.J. Jelinek, J. Viszlai, and D.B. Carpenter. 1979. Site index equations and curves for the major tree species in British Columbia. Forest Inventory Report No. 1. Ministry of Forestry, Victoria, British Columbia.

Herman, F.R., R.O. Curtis, and D.J. Demars. 1978. Height growth and site index estimates for noble fir in high-elevation forests of the Oregon-Washington Cascades. Research Paper PNW-243. U.S. Forest Service Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.

Hoyer, G.D., and F.R. Herman. 1989. Height-age and site index curves for Pacific silver fir in the Pacific Northwest. Research Paper RP-418. U.S., Forest Service. Pacific Northwest Research Station, Portland, Oregon.

King, J.E. 1966. Site index curves for Douglas-fir in the Pacific Northwest. Forestry Paper 8. Weyerhaeuser Company, Forestry Research Center, Centralia, Washington.

Kurucz, J.F. 1978. Preliminary, polymorphic site index curves for western red cedar (*Thuja plicata Donn*) in coastal British Columbia. Forest Research Note No. 3. MacMillan Bloedel, Nanaimo, British Columbia.

Meyer, W.H. 1961. Yield of even-aged stands of ponderosa pine. Technical Bulletin 630 (revised 1961). United States Department of Agriculture, Washington, D.C.

Meyer, W.H. 1937. Yield of even-aged stands of Sitka spruce and western hemlock. Technical Bulletin 544. United States Department of Agriculture, Washington, D.C.

Monserud, R.A. 1985. Applying height growth and site index curves for inland Douglas-fir. Research Paper INT-347. U.S. Forest Service. Intermountain Research Station, Ogden, Utah.

Schmidt, W.C., R.C. Shearer, and A.L. Roe. 1976. Ecology and silviculture of western larch forests. Technical Bulletin 1520. U.S. Forest Service, Washington, D.C.

Wiley, K.N. 1978. Site index tables for western hemlock in the Pacific Northwest. Forestry Paper No. 17. Weyerhaeuser Company, Western Forestry Research Center, Centralia, Washington.

Worthington, N.P., F.A. Johnson, G.R. Staebler, and W.J. Lloyd. 1960. Research Paper No. 36. Normal yield tables for red alder. U.S. Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.













Washington Department of FISH and WILDLIFE

Tara Satushek Comment # 85

From: Liam Diephuis <lrdiephuis@gmail.com>
Sent: Friday, November 22, 2024 3:35 PM
To: PDS comments
Subject: Climate Change Preliminary Policies
Attachments: SkagitCounty_ClimatePoliciesV1.2_1015_PlanningCommission_clean.pdf

Hello,

With CE7.4, I appreciate that there is a desire to "upgrade rail, trolley, bus, or rapid-bus route stops." Improvements in transit frequency and accessibility are essential to reducing fossil fuel VMT. Transit is even better than encouragement of personal EVs due to the positive effect that public transit has on housing availability and economic health.

CE9.1: YES! I work with small public and private water purveyors (as a consulting engineer) all the time and it's sadly common to see them running out of water due to a failure on the part of the system owners to prepare for the future. If they are encouraged more to prepare, they have to spend less money on repairing the system by the time they come to us.

Those are my only comments on the climate and environmental policies. Good day!

-Liam Diephuis
414 Park Street, Mount Vernon

Sector	Policy	Element	Theme / Subheading	FIRST DRAFT Proposed Policy Revision *This first draft is for early discussion with the Planning Commission and to collect early feedback from the public. The policies will undergo several rounds of revision before their estimated final adoption in June 2025*	Reasoning for Proposed Policy Change
Agriculture & Food Systems	CE 1.0 Goal	Climate	Climate resilience; Drought; Land use	Promote a resilient and sustainable agricultural sector by preserving farmland, supporting climate resilience efforts, and ensuring the well-being of farmworkers and farming communities.	Overarching goal for Agriculture & Food Systems sector. To note, many policies regarding agriculture are located in Chapter 4 - Natural Resource Lands.
Agriculture & Food Systems	CE 1.1	Climate	Climate resilience; Land use	Continue to support and secure funding to protect agricultural land from conversion to other uses through the Conservation Futures taxing mechanism, federal and state grants, and private funding sources.	Implementation of this policy could include ensuring robust state and local funding for voluntary agricultural conservation easements, as well as developing streamlined, creative, and low-cost loan financing in support of agricultural land protection and land access for new and beginning farmers.
Agriculture & Food Systems	CE 1.2	Climate	Climate resilience; Drought; Land use	Support WSU Skagit County extension program in providing educational opportunities for farmers and landowners to adopt regenerative agricultural practices that enhance soil health and resilience.	Work with the agricultural community to set aside some portions of rural lands for (and encourage) development of regenerative agriculture farms.
Agriculture & Food Systems	CE 1.3	Climate	Climate resilience; Land use	Promote and support adequate, safe, and affordable supply of housing for farmworkers in urban growth areas that addresses the unique needs of agricultural communities, prioritizing equitable access to healthy living environments, reducing environmental health risks, and promoting the well-being of farmworker families.	Additional policies related to farmworker housing in Chapter 7E. Rooted in principles of environmental justice and equity. Farmworkers disproportionately face housing challenges, environmental health risks, and inadequate living conditions. By ensuring a supply of safe, affordable housing, this policy aims to address these inequities while recognizing the essential role farmworkers play in the agricultural industry.
Agriculture & Food Systems	CE 1.4	Climate	Climate resilience; Drought; Land use	Support the WSU Skagit County extension program and the Skagit County Conservation District in providing agricultural resilience resources and programs to support farmers in making informed business decisions in a changing climate.	Key implementers include the WSU Skagit County extension program and the Skagit County Conservation District.
Agriculture & Food Systems	CE 1.5	Climate	Climate resilience; Drought; Land use	Work with special purpose districts, the WSU Skagit County extension program, WSU NWREC, the Skagit County Conservation District, diking/drainage districts, and Skagit tribes to enhance flooding, sea level rise, and drought resilience within the agricultural sector, ensuring that farming practices, water management, habitat quality, and economic stability are effectively supported during extreme events.	Overlaps with drainage policy included in Natural Resource Lands Policy 4A-5.6, but adds more overarching policies for extreme climate impacts.
Agriculture & Food Systems	CE 1.6	Climate	Climate resilience; Land Use; Sea-level rise; Ecosystems	Protect the +/-88,000 acres of remaining prime farmland in Skagit County. Success requires continued commitment to restrictive farmland zoning; continued farmland development right acquisition through the Farmland Legacy Program; support for an adequate water right necessary to sustain Skagit Agriculture; and	

Sector	Policy	Element	Theme / Subheading	FIRST DRAFT Proposed Policy Revision *This first draft is for early discussion with the Planning Commission and to collect early feedback from the public. The policies will undergo several rounds of revision before their estimated final adoption in June 2025*	Reasoning for Proposed Policy Change
				an integrated, strategic investment plan in partnership with Skagit tribes and diking/drainage districts, to holistically address sea level rise, habitat enhancement, and farmland preservation on the Skagit/Samish Delta downstream of the Wild & Scenic portion of the Skagit River.	
Zoning & Development	CE 10.0 Goal	Climate	Climate resilience; Drought; Land use; Sea level rise; Flooding	Enhance community resilience by integrating climate change projections into land use, infrastructure planning, and development regulations, ensuring long-term safety from sea-level rise, flooding, wildfires, and other climate-exacerbated hazards while protecting natural ecosystems.	Overarching goal for the Zoning and Development sector.
Zoning & Development	CE 10.1	Climate	Climate resilience; Sea level rise	Work with regulatory agencies to develop regulations for elevating or setting back new and substantially improved structures located within mapped areas sea-level rise hazard areas to reduce the risk of damage caused by sea level rise.	Development along Washington's marine shorelines is vulnerable to flooding and erosion that may be exacerbated by sea level rise. Local governments can implement this policy by assessing sea level rise projections for their jurisdiction and also consider where erosion and landslides are already a risk. They can then review existing setback requirements and determine if additional regulations for setbacks or building elevations are needed to protect structures in the future, and implement these through their development code. Local governments may need to technical support to identify vulnerable areas and will need to work with landowners to build support for new regulations.
Zoning & Development	CE 10.2	Climate	Climate resilience; Sea Level Rise; Extreme Precipitation	Consistent with State and Federal standards, plan and build facilities, utilities, and infrastructure projects to mitigate or withstand flooding from rising sea levels and changing precipitation patterns.	Incorporating projected sea-level rise and inundation impacts into the planning and construction of public buildings will help reduce long-term social, economic, and environmental risks.
Zoning & Development	CE 10.3	Climate	Climate resilience; Extreme Precipitation	Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling.	Adopted from NHMP Initiative #29 Important to manage the floodplain based on most recent and comprehensive projections of flood zones. Local governments plan for flooding through comprehensive flood hazard management planning, hazard mitigation planning, designating frequently flooded areas, and other land use policies. Plans and policies should consider and address projected changes in the frequency, intensity, and location of flooding due to climate change. A first step is to assess your community's vulnerability to flooding

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					from sea level rise, extreme precipitation, and other changes that may already be impacting or will impact your community. A second step is to review existing plans that address floodplain planning, and identify any gaps or needs to better consider climate change. The Department of Ecology provides guidance for developing comprehensive flood hazard management plans that consider current and future conditions. Floodplain planning is likely most effective when conducted collaboratively with all jurisdictions within a river basin, including other counties, cities, and tribes.
Zoning & Development	CE 10.4	Climate	Climate resilience; Sea level rise	Require that proposals for shoreline stabilization demonstrate a need, and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise.	The updated SMP may have more policies related to shoreline stabilization. It will be important to ensure these policies align. Shoreline stabilization including seawalls and bulkheads may not be necessary or effective in many situations. These types of structures also have negative impacts on coastal habitat. Landowners may have increasing interest in constructing shoreline stabilization to protect their property from erosion and flooding issues exacerbated by sea level rise. SMPs already require that new development should be designed and located where it will not require new shoreline stabilization over the lifespan of the structure (see WAC 173-26-231). Skagit can ensure that permit applications for shoreline stabilization are thoroughly reviewed for a demonstration of need for stabilization, and that the least impacting appropriate alternative is selected. Skagit could develop internal resources for staff reviewing shoreline stabilization proposals to create consistency in review and transparency for applicants. Skagit could also promote the Shore Friendly program, which provides education and resources for private landowners to reduce shoreline armor and restore shoreline habitats.
Zoning & Development	CE 10.5	Climate	Climate resilience; Sea level rise	Consider future climate conditions during siting and design of capital facilities to help ensure they function as intended over their planned life cycle.	The Capital Facilities Plan (CFP) includes a six-year capital improvement plan (CIP) and budget and a longer-range plan for capital investments. The CFP provides for the full implementation of the land use plan by showing

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					how public facilities and services will be provided for in the community, at the population and intensities of development envisioned in the plan, and at adopted levels of service. Given that capital facilities represent significant public investments, it is prudent to ensure that facilities are designed and sited to be resilient to climate impacts. Early collaboration among planners, public works, and transportation staff can help ensure that climate change is considered as capital facilities plans are prepared.
Zoning & Development	CE 10.6	Climate	Climate resilience; Wildfire; Extreme Heat; Extreme Precipitation	Establish development regulations that support and incorporate best practices for reducing the risks and consequences of wildfire, extreme heat, flooding, and other climate-exacerbated hazards.	These regulations could focus on building codes that enhance natural ventilation, encourage green roofs, and create heat-resilient infrastructure (cooling centers, tree canopy).
Zoning & Development	CE 10.7	Climate	Climate resilience; Sea level rise	Protect and restore coastal ecosystems to increase the resilience of species, habitats, and communities to climate change.	As sea levels rise, valuable coastal habitat may be impacted. Coastal wetlands and vegetation provide fish and wildlife habitat and protect infrastructure from waves and erosion. This policy will require collaboration with researchers, agencies, landowners, conservation entities, and others.
Zoning & Development	CE 10.8	Climate	Climate resilience; Sea Level Rise; Extreme Precipitation	Ensure all residential and commercial development and accessory uses, port and water-related industrial facilities, equipment, and works should be located, designed, and maintained to avoid, or if necessary, withstand 100-year flood frequency flooding and/or storm tides or surges without becoming hazards and without the placement of flood hazard reduction measures or other hard structural shoreline stabilization. Incorporate climate projections to account for anticipated changes in flood frequency, storm intensity, and sea-level rise. Ensure that designs and maintenance plans adapt to these projections to enhance long-term resilience against evolving climate impacts.	Adopted from SMP 6C-7.35 D and SMP 6C-15.72 and will be included in both the SMP and the Climate Element. Important to include climate projections in design processes. Combined two SMP policies that were similar for clarity.
Buildings & Energy	CE 2.0 Goal	Climate	Climate resilience; Sea Level Rise; Extreme Precipitation	Enhance the resilience and reliability of energy infrastructure. Promote and support building designs that better withstand climate change impacts.	Overarching goal for the Buildings & Energy sector. Energy Conservation policies, such as promoting energy efficiency and renewable energy sources is addressed in Utilities - Energy Conservation chapter of the Comprehensive Plan

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Buildings & Energy	CE 2.1	Climate	Climate resilience; Extreme Heat	Develop regulations that require commercial developments to address climate resilience through best management practices, such as floodproofing, adaptation to sea-level rise, and the integration of green infrastructure.	Adopted from Shoreline Master Program 6C-5.3 Design and is Commerce Menu of Measure's High Priority Action. Development regulations that integrate best practices for extreme heat, such as building codes that enhance natural ventilation, encourage green roofs, and create heat-resilient infrastructure (cooling centers, tree canopy). Such measures help reduce building cooling costs and heat-related illnesses and deaths.
Buildings & Energy	CE 2.2	Climate	Climate resilience; Wildfire	Work with energy providers to improve the safety and reliability of infrastructure vulnerable to climate change.	Energy utilities' infrastructure, such as transmission lines and gas plants, have been seen to start wildfires and are also impacted by wildfires, extreme heat, and other climate-exacerbated hazards. Recommendations could include removing tree limbs near power lines or burying lines, establishing redundancies, and creating small-scale energy generation systems.
Buildings & Energy	CE 2.3	Climate	Climate resilience; Wildfire	Require new residential subdivisions and commercial and industrial developments to bury electricity transmission lines and associated infrastructure to reduce damage from storms and wildfire ignition risks.	Energy utilities' infrastructure, such as transmission lines and gas plants, have been seen to start wildfires and are also impacted by wildfires, extreme heat, and other climate-exacerbated hazards. This policy could be implemented via development code changes that require developers of new subdivisions to bury place power lines and associated infrastructure underground.
Buildings & Energy	CE 2.4	Climate	GHG Reduction; Buildings & Energy	Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands.	With the recent demand for renewable energy and energy storage facilities, the County should assess where these facilities should be sited.
Community Health & Well-being	CE 3.0 Goal	Climate	Climate resilience; Socioeconomic Impacts	Protect community health and well-being from the impacts of climate-exacerbated hazards and ensure that the most vulnerable residents do not bear disproportionate health impacts.	Overarching goal for Community Health & Well-being sector. See related policy 4B-2.11 (Wildfire Planning Program) in the existing Comprehensive plan. Commerce noted that frontline communities identified creating places in a community to go to in emergencies such as for shelter & resources when there is a natural disaster as a top environmental justice priority.
Community Health & Well-being	CE 3.1	Climate	Climate resilience; Emergency preparedness	Expand and bolster efforts to reduce the negative impacts of natural hazards, such as appropriate hazard identification, warning, dissemination of relevant information and data, and public outreach.	In particular, improve notification process for effective climate preparedness. Adopted from NHMP Initiative #26 Action Update mentioning that this should be high priority. See below:

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					INITIATIVE #26 – Conduct activities that support mitigation efforts to reduce the negative influence of natural hazards impacting Skagit County, such as appropriate hazard identification, warning, dissemination of relevant information and data, and public outreach. Action Update: After Nov 2021 floods this should be a high priority. We need to improve our notification process for the public.
Community Health & Well-being	CE 3.2	Climate	Climate resilience; Emergency Management	Promote and support resilience hubs — community-serving facilities that are designed to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life.	Adopted from NHMP Initiative #8: Identify and designate emergency shelter structural and utility readiness for occupancy after a significant incident. Resilience hubs — a concept developed by the Urban Sustainability Directors Network — are well-trusted, well-utilized community facilities that serve the needs of the community more broadly than temporary emergency shelters. Designed and managed by the community (e.g., a local non-profit or house of worship), resilience hubs can enhance social cohesion by providing residents a place to gather and access information and services at all times. During wildfire smoke events, for example, such hubs could provide cool, filtered air and respiratory masks in neighborhoods with greater socioeconomic risk and prevalence of asthma and other respiratory conditions. Such hubs could also provide residents a place to receive basic medical care, charge electronic devices, and access the internet. To maintain power during outages and to provide steady-state services, such hubs could be outfitted with a solar and back-up battery storage system (energy system) that can serve as an island from the conventional grid.
Community Health & Well-being	CE 3.3	Climate	Climate resilience; Emergency Management	Continue to develop and support hazard planning policies identified in the Multi-Jurisdictional Natural Hazard Mitigation Plan.	The NHMP will be updated in 2025.

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Community Health & Well-being	CE 3.4	Climate	Climate resilience; Socioeconomic Impacts	Maintain and support a program to distribute cooling and/or air purifying units to protect against extreme heat, prioritizing households with residents most vulnerable to extreme temperature events (e.g., low-income seniors).	Commerce notes that a good model for establishing goals, funding, and eligibility criteria is the Portland Clean Energy Community Benefits Fund (PCEF) Heat Response Program.
Community Health & Well-being	CE 3.5	Climate	Climate resilience; Extreme Heat	Work with Skagit County WSU extension and other organizations to support programs to educate and train employers and workers about working in extreme heat. Measures could include mandatory heat protection (cooling breaks, shade, hydration) and stricter enforcement of work-rest cycles during heatwaves.	Implement policies to protect outdoor workers exposed to extreme heat, such as mandatory heat protection measures (cooling breaks, shade, hydration) and stricter enforcement of work-rest cycles during heatwaves.
Community Health & Well-being	CE 3.6	Climate	Climate resilience; Wildfire	Create a comprehensive wildfire smoke resilience strategy by collaborating with local residents and organizations, emergency management officials, and air quality agencies.	Comp Plan Forest Resource Lands has a parallel policy on Wildfire Planning Program (4B-2.11) As wildfires become more frequent, the risk of fire damage to buildings, especially homes, is expected to rise significantly, particularly in the wildland-urban interface (WUI) areas where development meets undeveloped land. With much of Skagit County located within these WUI zones, the region faces a growing wildfire risk to both communities and infrastructure. This policy could include the purchase and installation of low-cost air quality monitors at strategic sites across the city or county, especially if the jurisdiction is far from a regulatory air quality monitor. Notification alerts, which should be accessible in different formats and languages, could warn residents and visitors when they should evacuate or head indoors (e.g., at home or a community resilience hub) to avoid wildfire smoke exposure.
Cultural Resources and Practices	CE 4.0 Goal	Climate	Climate resilience; Socioeconomic Impacts	Promote climate resilience and equity through culturally sensitive outreach and education, and strengthen collaborative relationships with Tribal governments, local leaders, and non-profit groups that work with vulnerable communities to effectively manage climate change risks.	Overarching goal for Cultural Resources and Practices sector.
Cultural Resources and Practices	CE 4.1	Climate	Climate resilience; Socioeconomic Impacts	Develop and implement culturally relevant outreach and educational programs to raise awareness of climate change impacts, ensuring equitable opportunities for all residents to participate in and shape climate-related policy decisions.	Best practice to ensure community is informed about climate change threats. Make the outreach and education materials available in different languages (e.g., Spanish) and formats (e.g., accessible for people with hearing,

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					vision, and mobility differences) per the demographics and needs of community members.
Cultural Resources and Practices	CE 4.2	Climate	Climate resilience; Socioeconomic Impacts	Work with federally recognized tribal governments, federal and state agencies, and appropriate community leaders to identify and support the conservation of culturally important consumptive and non-consumptive resources including foods, medicinal plants, and materials that could be adversely impacted by climate change.	Commerce Menu of Measures High Priority Action. Examples of culturally important resources include salmon and other marine resources, mollusks, berries, cedar bark, grasses, roots, game, and waterfowl. Work with appropriate partners (tribes, local communities) to integrate traditional ecological knowledge and science to identify important resources and areas, assess their climate vulnerabilities, and develop a plan to protect and enhance their resilience to climate impacts.
Cultural Resources and Practices	CE 4.3	Climate	Climate resilience; Socioeconomic Impacts	Strengthen and sustain government-to-government partnerships with Tribal governments to collaboratively address climate change impacts and protect traditional cultural properties that are at risk due to climate impacts.	Coordination with Tribal governments will be key to co-manage climate change risks. The Swinomish Indian Tribal Community is one of the five largest employers in Skagit County, with over 250 employees in Tribal government and approximately 300 employees in its casino and other economic enterprises. Other Tribal communities in Skagit County include the Samish Indian Nation, the Upper Skagit Indian Tribe, and the Sauk-Suiattle Indian Tribe.
Economic Development	CE 5.0 Goal	Climate	Climate resilience; Socioeconomic Impacts	Foster economic resilience and sustainable growth by supporting businesses and workers in climate preparedness and resilience.	Overarching goal for Economic Development sector. Ensuring plans for business continuity is an important aspect of climate resilience.
Economic Development	CE 5.1	Climate	Climate resilience; Socioeconomic Impacts	Support businesses and industries in climate preparedness; ensure economic recovery plans incorporate sustainable practices and continuity of operations.	Action examples could include updating building codes and offering tax incentives or grants to support businesses' installation of rooftop solar panels, batteries, and other on-site renewable energy generation and storage infrastructure that can provide back-up power during emergencies and support continuity of operations.
Economic Development	CE 5.2	Climate	Climate resilience; Socioeconomic Impacts	Define and identify frontline communities, including low-income communities, outdoor workers, and those employed in carbon-intensive industries, who may be disproportionately impacted by environmental and economic shifts.	Commerce Menu of Measures High Priority Action. Support organizations that are committed to building accessible on-ramps to living-wage green careers within frontline communities and leading specialized promotion of green industry sectors catered to frontline

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					communities. Examples of such green jobs could include solar panel and green roof installation and maintenance.
Economic Development	CE 5.3	Climate	Climate resilience; Socioeconomic Impacts	Support schools, technical institutions, labor unions, businesses, and community-based organizations to develop accessible training programs, apprenticeships, and career advancement pathways in living-wage low carbon industries, including renewable energy, sustainable infrastructure, energy efficiency, and environmental restoration.	Commerce Menu of Measures High Priority Action. Support organizations that are committed to building accessible on-ramps to living-wage green careers within frontline communities and leading specialized promotion of green industry sectors catered to frontline communities. Examples of such green jobs could include solar panel and green roof installation and maintenance. Partners could include schools, labor unions, businesses, and community-based organizations.
Land Use & Ecosystems	CE 6.0 Goal	Climate	Climate resilience; Ecosystems	Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction.	Overarching goal for Land Use & Ecosystems sector. See Chapter 4 - Natural Resource Lands policy 4A-5.6 for modified agricultural drainage policy.
Land Use & Ecosystems	CE 6.1	Climate	Climate resilience; Ecosystems	Ensure the protection and restoration of streams, riparian zones, estuaries, wetlands, and floodplains to maintain healthy, climate-resilient watersheds.	Alignment with Commerce Climate Menu of Measures. Commerce mentioned that frontline communities identified using land and plants to absorb carbon pollution and prioritizing this work in frontline communities as an environmental justice priority.
Land Use & Ecosystems	CE 6.2	Climate	Climate resilience; Ecosystems	Once modeling is available, incorporate hydrologic climate impact projections into the design of water-crossing structures such as culverts and bridges to support fish passage and habitat quality.	Alignment with Commerce Climate Menu of Measures High Priority Action. Climate change scientists have noted changes in Pacific Northwest hydrology, including reductions in the size of glaciers, less snowpack, and earlier peak stream flow in many rivers. These trends are expected to continue, along with increasing flood size, and decreasing summer low flows. Typically, the size of water-crossing structures like culverts and bridges is based on stream width. As the size of floods increases, so will stream width. Culverts and bridges built to accommodate higher stream flows are less likely to fail and block fish, which reduces future maintenance and repair costs.
Land Use & Ecosystems	CE 6.3	Climate	Climate resilience; Flooding	Minimize stream sedimentation from extreme precipitation events and flooding by implementing watershed restoration plans that identify susceptible streams and vulnerable areas, restore	In the Skagit County watershed, streamflow is expected to increase in winter and decrease in summer and fall. Effective watershed restoration improves water quality,

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				streambanks, and enhance stream health through collaborative efforts with public and private partners.	reduces erosion, and enhances the resilience of streams to extreme weather events. By focusing on habitat complexity and ecological function, this policy aims to promote healthier watersheds that can better support diverse wildlife and plant communities.
Land Use & Ecosystems	CE 6.4	Climate	Climate resilience; Wildfire	Work to increase tree canopy and forest acreage and health, including in urban areas, to enhance ecosystem health, carbon sequestration, and improve air quality.	This policy could reduce the urban heat island effect, increase biodiversity, increase carbon sequestration, and improve health and well-being by improving air quality. Aligned to Commerce Menu of Measures.
Land Use & Ecosystems	CE 6.5	Climate	GHG reduction; Land Use	Limit tree loss and support low-carbon and sustainable forest, agriculture, and livestock management.	Implementing this policy requires coordination on landscape-level management across jurisdictions and with private landowners. Local land use codes should increase scrutiny and review over tree removal in certain areas by prioritizing retention of healthy trees and tree canopy. Requirements should focus on balancing the tradeoffs between the retention of existing healthy trees, the planting of new trees in locations that better support tree health and maintain or increase tree canopy, and the efficient and strategic use of limited developable land. Use an equity framework to prioritize low-canopy and low-income neighborhoods. Also, ensure the forest master plan facilitates ecologically appropriate management across different ownership types and jurisdictional boundaries.
Land Use & Ecosystems	CE 6.6	Climate	GHG reduction; Land Use	Protect and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems.	Important policy to align to reducing GHG emissions from conversion of land use.
Land Use & Ecosystems	CE 6.7	Climate	GHG reduction; Land Use	Align with Conservation Futures and Open Space Program strategies of the Climate Commitment Act to maximize conservation and carbon sequestration efforts.	Commerce notes that TDR, Conservation Futures, and Open Space Program strategies can foster carbon sequestration. It is a longer term (+ 5 years) assistance to GHG reduction.
	CE 7.0 Goal	Climate	GHG reduction; Climate Resilience; Land Use	Promote transportation resilience to climate impacts and reduce vehicle miles traveled while prioritizing benefits for overburdened communities.	Overarching goal for the Transportation sector. Transportation Chapter 8A in the Comp Plan addresses many of the policies related to reduction of VMT, incorporation of equity.

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Transportation	CE 7.1	Climate	GHG reduction; Transportation	Support the expansion of employer commute trip reduction (CTR) programs to include both large and small businesses across various jurisdictions.	Travel Demand Management (TDM) is a Commerce Menu of Measures High Priority Action. According to Commerce, Commute trip reduction (CTR) programs and strategies are required for large employers (100+ employees). These programs can and should be scaled to fit smaller businesses in different jurisdictions and circumstances. Facilitate participation in the employer commute trip reduction program and expand the program beyond large employers. Provide workers with flexible work schedules and guaranteed rides home. CTR should be an integral part of expanding existing demand management programs. Encourage major employers to establish satellite offices, as well as remote and telework programs.
Transportation	CE 7.2	Climate	Climate resilience; Extreme Precipitation	Map and prioritize transportation infrastructure that is vulnerable to repeated floods, landslides, and other natural hazards, and designate alternative travel routes for critical transportation corridors when roads must be closed. Strengthen the resilience of public transportation systems against heatwaves and extreme precipitation by implementing proactive measures that prevent delays, reduce disruptions, and minimize the risk of community isolation.	Ensures resiliency of public transit systems to climate-exacerbated hazards, in alignment with Commerce Climate Planning for Resiliency. Mapping transportation infrastructure would include all hazards as identified by local, state, and other known resources. This could include integrating this "lifeline" transportation route map into the jurisdiction's emergency operations plan. Integrating this information into the comprehensive plan, the transportation plan, an evacuation plan, a natural hazards mitigation plan, and other plans would help boost local resilience capacity. Update infrastructure map periodically using updated climate modeling.
Transportation	CE 7.3	Climate	GHG reduction; Transportation	Encourage and support the transition to EVs through expansion of reliable EV charging infrastructure throughout Skagit County, prioritizing high-traffic areas with little existing infrastructure. Provide education on options and available rebates and incentives.	Commerce noted that frontline communities identified making it easier to not need a car, as well as reducing fossil-fuel vehicle miles by switching to electric vehicles and installing charging stations near residences, as an environmental justice priority.
Transportation	CE 7.4	Climate	GHG reduction; Transportation	Support community mobility hubs in strategically accessible, multimodal available locations with a focus on overburdened communities experiencing a scarcity of transportation alternatives.	Alignment to Commerce Climate Menu of Measures. Mobility hubs are centralized locations where people can access multiple transportation modes (e.g., bike share, transit, and micromobility devices). The development of mobility hubs may be an incremental upgrade of sites as opportunities arise such as: new or refurbishment of

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					middle and multifamily housing plus commercial development; upgrade of rail, trolley, bus or rapid-bus route stops; utility service work; introduction of electric vehicle infrastructure.
Transportation	CE 7.5	Climate	GHG reduction; Transportation	Seek to reduce greenhouse gas emissions and air pollutants from County-owned vehicles, equipment, and machinery, where feasible, using clean fuel technologies including but not limited to bio-blend fuels or converting to electric or hydrogen power.	The County will explore the feasibility of transitioning the use of fossil fuels to using clean fuel technologies for County-owned vehicles, equipment, and machinery, where feasible.
Waste Management	CE 8.0 Goal	Climate	GHG reduction; Solid Waste	Enhance waste management practices to align with Skagit County's Comprehensive Solid Waste Management Plan, with a focus on reducing greenhouse gas emissions.	Overarching goal for the Waste Management sector. Many policies exist in the Solid Waste Management sector of the Utilities chapter and in Skagit County's Waste Management Plan.
Waste Management	CE 8.1	Climate	GHG reduction; Solid Waste	Support implementation of the Skagit County Comprehensive Solid Waste Management Plan, including initiatives focused on waste prevention and diversion.	Many initiatives in the Waste Management Plan address waste management, including waste reduction, public education, recycling, composting, and waste collection expansion.
Waste Management	CE 8.2	Climate	GHG reduction; Solid Waste	Strengthen waste management engagement and education policy by developing targeted campaigns for reducing, recycling, reusing, and composting material with highest GHG reduction impact (e.g., paper, metal, food waste) in culturally contextualized outreach and education initiatives and materials.	Commerce notes that frontline communities identified reducing material consumption and reuse as a top environmental justice priority.
Water Resources	CE 9.0 Goal	Climate	Climate resilience; Drought	Support long-term water security needs through integrated natural resource management planning and implementation.	Overarching goal for Water Resources sector.
Water Resources	CE 9.1	Climate	Climate resilience; Drought	Encourage and support public and private water purveyors to prepare for climate related drought by planning and funding appropriate capital facility upgrades.	This policy has many social, economic, and environmental co-benefits: For lower-income community members, spikes in water pricing following emergency measures can impact a household's ability to pay for other necessary goods such as healthy food and medicine. Planning for drought has the benefit of preparing people mentally for a drought period, activating important resources to support the negative effects of drought on mental health, and potentially helping to reduce potential for community conflicts over water. Preparing for drought has the benefit of establishing norms and agreements in advance of drought, which can reduce the costs to both water providers and the community members they serve by avoiding the

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					inefficiencies of setting up emergency water infrastructure and delaying or avoiding provision of emergency water to a community. Preparing for drought and developing broad partnerships in the course of planning also helps develop communication and outreach channels through which community members most highly impacted by drought may be reached.
Water Resources	CE 9.2	Climate	Climate resilience; Wildfire; Drought	Assess and implement resilience strategies to reduce the vulnerability of Skagit's aquifers, wastewater systems, and septic systems to seawater intrusion, flooding from rising sea levels, and changing groundwater tables.	Collect and analyze data from the municipal level (e.g., utilities) and potentially from regional and state levels. Evaluate the long-term adequacy of water delivery infrastructure to ensure that changes in hydrological patterns (e.g., increases in flooding frequency or reduction of late-summer water availability associated with climate change) can be anticipated and managed effectively. Aligns with the Saltwater Intrusion Policy in Chapter 5.
Water Resources	CE 9.3	Climate	Climate resilience; Drought; Built Environment	Support water conservation practices such as rainwater catchment, onsite retention, and water reuse to conserve water resources.	This policy would support water conservation and build resilience to droughts exacerbated by climate change.
Water Resources	CE 9.4	Climate	Climate resilience; Drought; Agriculture	Support and advocate for an adequate uninterruptible water right for Skagit Agriculture at a point of withdrawal downstream of the Wild and Scenic portion of the Skagit River.	

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Tara Satushek Comment # 86

From: jday0730@gmail.com
Sent: Friday, November 22, 2024 4:14 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

November 22, 2024

To: Skagit County Commissioners, Skagit County Planning Commission, and Planning & Development Services Staff

From: John Day
6368 Erwin Lane
Sedro Woolley, WA 98284

Re: Comments on Comprehensive Plan Update – Environment & Climate Elements

Thank you for this opportunity to comment on the Environment & Climate Elements of Skagit County's 2025 Comprehensive Plan Update.

As a member of Skagit County's Climate Change Task Force in 2008 and 2009, I participated in drafting proposed language for the 2010 Climate Action Plan, which included statements committing the county to reducing greenhouse gas emissions and combatting climate change. This commitment was critical then, and it has helped guide at least some incremental positive movement in the interim. Now, fourteen years later, it is far more critical, as our time to forestall cataclysmic climate impacts has nearly run out. Much more dramatic action is required.

Overall, I believe the draft Climate Element policies and suggested updates to the Environment Element are on the right track, and none of them should be removed. I offer the following comments and suggestions:

Climate Element

1. Goal CE 10.0 Climate resilience; Drought; Land use; Sea level rise; Flooding

I strongly support this goal for zoning and development as written:

> "Enhance community resilience by integrating climate change projections into land use, infrastructure planning, and development regulations, ensuring long-term safety from sea-level rise, flooding, wildfires, and other climate-exacerbated hazards while protecting natural ecosystems."

It is appropriate, and in fact essential, that the Comprehensive Plan include this important climate change effect, which it does at a number of points. I am very concerned, however, that the draft update of Skagit County's Shoreline Master Program (SMP) does not address sea level rise. I strongly urge the County not to wait until it is again required by law, but to begin as soon as the Comprehensive Plan update process is complete to draft a new SMP update that does address seal level rise.

2. Policy CE 10.2

"Consistent with State and Federal standards, plan and build facilities, utilities, and infrastructure projects to mitigate or withstand flooding from rising sea levels and changing precipitation patterns."

Please either expand this policy or write a separate one to address existing facilities and infrastructure in harm's way from sea level rise, increased flooding, or coastal erosion. The policy as written addresses only future construction. Assets at risk need to be mapped and then prioritized for adaptive measures or relocation.

3. Policy CE 10.4

"Require that proposals for shoreline stabilization demonstrate a need and require the use of soft shore stabilization methods to the extent practicable to protect sites from wave-driven erosion or flooding exacerbated by sea level rise."

Rising sea level and storms of increased severity could motivate shoreline residents to install new or more robust hard armoring. Ultimately, this approach will be futile and will further degrade shoreline processes. I am concerned that armoring shorelines destroys the spawning habitat needed by forage fish such as smelt and sand lance. These small species are the base of the marine food chain for salmon, seabirds, marine mammals, and ultimately orcas. I believe that Skagit County should collaborate with the appropriate state and federal agencies to proactively identify and map areas where shoreline residents are at risk from seal level rise. Furthermore, I urge Skagit County to have a policy of incentives, for example through a Transfer of Development Rights program, for shoreline residents living in harm's way to relocate. Policy CE 10.4 should more strongly discourage building where any type of shore stabilization would be needed and should include programs to dissuade such development.

4. Policy 10.7

"Protect and restore coastal ecosystems to increase the resilience of species, habitats, and communities to climate change."

I strongly support this policy. Please make it more specific to Skagit County, mentioning that as sea level rises what few remaining acres of salt marsh remain will be lost against coastal dikes. To retain and expand the ecosystem services which salt marshes provide by absorbing storm wave impact and reducing coastal erosion, the dikes must be repositioned inland. This also needs to be done to avoid losing key habitat for many avian and marine species.

5. Policy CE 2.4

"Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands."

I strongly support this policy consistent with our September 23, 2024, letter to the Energy Facility Siting Evaluation Council opposing the Goldeneye Battery Energy Storage System proposal and our October 24, 2024, comments on the draft revised Comprehensive Plan Utilities Element. There are places in Skagit County appropriate for facilities associated with energy production, storage, and transmission with minimal impact to the environment. It is important for Skagit County to identify these locations in advance of proposals being submitted for permitting.

6. Policy CE 3.1

"Expand and bolster efforts to reduce the negative impacts of natural hazards, such as appropriate hazard identification, warning, dissemination of relevant information and data, and public outreach."

The best available science predicts higher rainfall, more frequent storm events, and changing flooding patterns for Skagit County. In light of these predictions, there should be a policy to soon, and then more

frequently, update the map of natural hazard areas and to develop less flexible regulations concerning development in those areas. It has been too easy for property owners to obtain permission to build in areas prone to landslides, shoreline erosion, debris flows, and flooding. Building in such hazardous places will become less and less tenable, putting the county in the position of increasingly responding to dangerous and expensive emergencies.

7. Goal 6.0

I am strongly in favor of all the policies proposed under this goal; however I propose adding "and retention of wildlife" to the above statement so that it reads as follows:

> "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, GHG emissions reduction, and retention of wildlife."

The presence of diverse wildlife, especially birds, is one of the characteristics of Skagit County most important to me.

8. Policy CE 6.6

I strongly support natural climate solutions as part of the mix in addressing the effects of climate change, and propose the following revised language:

> "Protect and manage natural lands (forests, grasslands, wetlands, eel grass meadows, and salt marsh) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems."

County policies should strive to protect this function by actions to retain and expand these types of near shore environments.

Integration of Climate into other Comprehensive Plan Elements

9. Policy 9A-5.1

I would like to see stronger wording about phasing out fossil fuels in heating buildings as this is a major source of greenhouse gas emissions in Skagit County. I propose the following revised wording:

> "Non-renewable Resources – Energy generation from non-renewable resources, such as natural gas, shall be phased out where possible, and the county will explore the use of renewable energy sources in both new and existing buildings."

There should be an emphasis, too, on equipping Skagit County buildings with solar panels to supply as much of the energy need of the given facility as possible.

10. Policy 9A-5.5

I strongly support the policy as stated:

> "In parallel, support the transition of high carbon emitting sectors, including oil refining and industrial gas manufacturing, to low carbon processes or industries."

11. Policy 9A-5.6

I propose the following revised language:

> "The use of solar energy for water and space heating shall be encouraged and incentivized, including on existing and new commercial and industrial buildings. Where needed, ordinances shall be developed to protect solar access, particularly in high-density and overburdened communities, to enhance energy resiliency and equity. Skagit County will strongly encourage development of community solar projects on county-owned buildings and above county-owned parking areas."

Community solar projects could provide residents with the opportunity to invest in solar power when their own properties do not have the appropriate location for solar panels or when they cannot afford the cost of a complete installation. Anacortes has several examples on public buildings already.

Environment Element

12. Policy 5A-3.1

"Wildlife corridors and connections between areas of native vegetation, riparian corridors, that connect wetland systems, and open space should be conserved and protected whenever feasible through incentive programs."

I strongly support this and other policies to identify, enhance, and protect wildlife corridors.

13. Policy 5A-5.1(d)(i)

I support this policy, but propose strengthening it to read as follows:

"(i) Landscape-scale habitat corridors shall be considered in stream/riparian and wetland buffer regulations to protect habitats associated with riparian dependent species."

14. Policy 5A-5.3(d) Geologically Hazardous Areas

Please refer to our number 6 above. The wording of 5A-5.3(d) allows too much leeway for building in geohazard zones. Here and in Snohomish County we have seen the destructive and potentially catastrophic potential of too lax policies around development in hazard zones. This potential will only increase with greater storm severity and other effects of climate change.

15. Environmental Advisory Board

I understand that other organizations and individuals are urging the Board of County Commissioners to establish an Environmental Advisory Board to support their decision-making on such things as climate change-related actions. This is an excellent idea, and I support it. The technical aspects of some of the challenges facing Skagit County call for specialized expertise if sound decisions based on the best available science are to be made.

Thank you for considering my comments. I look forward to seeing future updates to the Comprehensive Plan policies.

Tara Satushek Comment # 87

From: Eric Knudsen <eericknudsen@gmail.com>
Sent: Friday, November 22, 2024 4:26 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

To the Skagit County Planning Commission

I am a retired fisheries scientist (Ph.D.) with over 45 years of experience in fish and wildlife, natural ecosystems, and aquatic and marine habitat research and management. I worked for 7 years for Louisiana State University, 21 years for the USFWS and then USGS. I then was a fisheries consultant for 17 years. I am the Co-founder of Ecologists Without Borders (https://www.ecowb.org/). I am very happy to have resided in Skagit County for the past 21 years and love the natural environment and rural character of the County.

I applaud the work thus far on the proposed updates to the Comprehensive Plan. The proposed changes will improve the quality of life in Skagit County, especially in the face of predicted population growth. I encourage the Commission to retain all the currently proposed changes except as I'm suggesting to modify them below. I hope my modifications will be taken in the spirit of positive suggestions to improve the Plan even further.

The following comments address items in the document SkagitCounty_ClimatePoliciesV1.2_1015_PlanningCommission_clean.pdf

Buildings and Energy
CE 2.4 I support this proposal but would like to see this proposal expanded, or another proposal added, to specify that all public buildings be outfitted with solar panels on their roofs and that incentives be created for larger private buildings, such as shopping centers, stores, barns, and other industrial buildings, have solar panels installed wherever possible. I support the draft revisions that emphasize the increased use of clean energy sources and a reduction of burning fossil fuels for energy, specifically, proposed policy revisions.

Land Use and Ecosystems
CE 6.0 I encourage the addition of a policy proposal (or expansion of 6.6) to increase the number of acres of forest that are designated as carbon sequestration (and recreational) acres, in bothe urban, rural, and forested areas. These would be areas specified to hold carbon and produce oxygen and will simultaneously serve as biodiversity reserves as well as excellent recreational opportunities.

Transportation
CE 7.0 and CE 7.1 I support proposals to expand the use of multi-modal transportation systems. In particular, I think a new policy proposal should be added to promote the use of bicycles and PEVs to reduce carbon output. There should be a specific proposal to build new bike corridors and/or add to bike lanes by widening existing roadways. Too many of the existing roads are too narrow for safe bike riding.

Water Resources

CE9.1 The proposed policy revision would be much improved if there was further specificity added to the statement " Encourage and support public and private water purveyors to prepare for climate related drought by planning and funding appropriate capital facility upgrades". What are the envisioned types of upgrades? Expanding reservoirs, building storage tanks, drilling more wells, improved water transport, etc.? The public would benefit from understanding what these upgrades might be so we can comment on the general potential impacts of such upgrades.

CE9.4 The phrase "..... consistent with other instream water uses such as fish and wildlife benefits" should be added to the policy proposal.

Zoning and Development
CE 10.5. I support the proposed policy revisions and request that energy conservation, generation and storage be added to the facilities on the list. This is to ensure that such energy facilities are not built in flood-prone locations.

CE10.6 I support policy revisions to expand forest resource lands wildfire strategy, which is so important as wildfire risk grows every year.

CE 10.7 Please add the concept of converting agricultural land near coastal areas and the lower river, that is no longer suitable for farming, due to waterlogging from increased sea level and precipitation (therefore river runoff), back to natural wetlands that benefit fish and wildlife.

In the document SkagitCounty_ClimateIntegration_PlanningCommission_0115.pdf

I am in favor of eliminating the existing policy 3A(b) that says that "the rural landscape will provide for a variety of rural densities and housing opportunities." When people live in rural areas but work in urban areas, there is automatically an increase in greenhouse gas emissions from the increased need for transportation. Let's keep development out of the rural areas and keep our fertile farmland for farming. Focus on in-filling and building upward with taller multi-unit dwellings.

Lastly, I want to encourage the Planning Commission, and eventually the County Commissioners, to establish an Environmental Advisory Board made up of people who have professional experience on a variety of environmental issues. In that way, the commissioners and the Planning Department have access to the best available science regarding climate impacts mitigation, open space issues, habitat restoration, conservation, connected wildlife corridors and other environmental issues. An EAB could help to ensure that careful planning always includes caring for our natural resources and mitigating the inevitable effects of global climate change.

Thank you for considering my comments.

Sincerely,
E. Eric Knudsen, Ph.D. (Wildlife and Fisheries Science)
Retired Fisheries Consultant
13033 Sunrise Dr.
Mount vernon, WA 98273
360-421-0828

Tara Satushek

Comment # 88

From: Karen Gardiner <kgardinerb@gmail.com>
Sent: Friday, November 22, 2024 4:27 PM
To: PDS comments
Subject: Skagit County's 2025 Comprehensive Plan Draft Policies

I have been a resident of Skagit County for over 35 years and am part owner of a small blueberry farm for the past 13 years, where some bushes were planted over 50 years ago and still produce.
Agriculture land is so important to our valley, Residential development outside of our cities will reduce the land base for farming and forestry which is so critical to the rural character of the valley we all love and appreciate.
New farmers who want to continue the farming tradition in our valley will need access to land to keep agriculture in the valley for future generations.

Please also consider establishing an Environmental Advisory Board that ideally would be made up of professionals,with knowledge in a variety of environmental issues, and members of the public. This will help the County Commissioners and the Planning Department look at environmental issues holistically and make decisions based on the best available science.

Thank you,
Karen Gardiner
726 N 14th Street
Mount Vernon, WA 98273

Tara Satushek Comment # 89

From: mbray1107@gmail.com
Sent: Friday, November 22, 2024 4:41 PM
To: PDS comments
Subject: Comments on Draft Comp Plan Changes

To whom it may concern.

I live in an area that was affected by the recent windstorm and power outage. We only got our power back late last night, and I have not had access to a computer for 3 day. Please accept these comments even though they are submitted ten minutes after the deadline. I have tried my best to get this submitted in time. Thank you.

Thank you for the opportunity to comment on the new draft comprehensive plan policies concerning climate change.

I am relieved to see the County respond to this critical issue, and support many of the proposed policy changes. However, policies are only as good as the implementation that follows. For this reason, I feel strongly that the County needs to establish an Environmental Advisory Board (EAB). Its long past time that a committee be established that is on par with the Forest Advisory Board and the Ag Advisory Board that is populated with experts in the appropriate fields of biology; geology, climate science; natural areas management; infrastructure and risk reduction; land use planning; etc. Individuals should be selected based on their commitment to work together to find real science-based solutions to Skagit County's environmental challenges for the benefit of all citizens of the County, not representing partisan agendas or special interests.

Some specific comments on draft policy changes:
Environment Element -- Policy 5A -- Critical Areas. I strongly support the proposed changes to "no net loss" of wetlands.

In addition: I commend the identification of wildlife corridor language in this Critical Areas section. As proposed the policy states: "Protect, restore where practical, and enhance fish and wildlife populations and their associated habitats, including corridor connections and tree canopy.

I strongly support strengthening this policy to provide more guidance for implementation, as follows: "Protect, restore where practical, and enhance fish and wildlife populations and their associated habitats, including seeking opportunities to protect and restore corridor connections and continuous tree canopy and cover, to allow wildlife movement and migration across the landscape."

I also support the proposed policy revision CE 10.3 "Consider climate change, including sea level rise, extreme precipitation, increased winter streamflow, and other impacts, in floodplain management planning by updating flood hazard zones according to most recent climate change projections and modeling."
Skagit County needs to actively plan for sea level rise and climate change by updating the Shoreline Master Program in the next three years.

All new development be situated to avoid needing shoreline stabilization and must avoid construction in tidal and storm surge areas.

I strongly support the following policy revisions:
3A(a), "Protect the rural landscape, character, and lifestyle by defining and identifying rural lands for long-term use, conservation, and resilience."
6.0 "Protect and enhance natural ecosystems to support climate change resilience, carbon sequestration, and GHG emissions reduction."

6.6 “Protect and manage natural lands (forests,grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems.”

I do not support Policy 3A(b) “Protect the rural landscape, character, and lifestyle by providing for a variety of rural densities and housing opportunities.” New housing and development belong in the cities not in the rural areas, period.

I support the proposed policy changes in CE10.6 “Establish development regulations that support and incorporate best practices for reducing the risks andconsequences of wildfire, extreme heat, flooding and other climate-exacerbated hazards.”
As well as 4B-2.11 “Wildfire Resilience Strategy. Develop a comprehensive, county-wide wildfire resilience strategy planning program to increase public safety and awareness regarding forest fire dangers, and establish the means of managing, reducing and suppressing catastrophic wildfires.”
The County should not allow residential development in and near areas zoned for industrial or secondary forestry. Managing for wildfire on a landscape level should be considered a risk reduction effort similar to floodplain management. Defending hopes in the wildfire prone areas is expensive and ineffective.

Thank you for your time and consideration.
Martha Bray
6368 Erwin Ln
Sedro Woolley, WA

Comment # 90

SKAGITONIANS
TO PRESERVE FARMLAND

November 22, 2024

Skagit County Planning & Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Comments to Draft Skagit County 2025 Comprehensive Plan Update: Climate, Environment, and Climate Integration Elements

Dear Planning Department:

Thank you for the opportunity to comment on the third tranche of Comprehensive Plan: Climate, Environment, and Climate Integration. These comments are submitted on behalf of Skagitonians to Preserve Farmland.

Climate and Climate Integration Elements

We support and applaud the county's leadership in developing and prioritizing the relationship between agriculture and climate resiliency, as expressed in Climate Element Goal 1.0: Promote a resilient and sustainable agricultural sector by preserving farmland, supporting climate resilience efforts, and ensuring the well-being of farmworkers and farming communities.

While numerous elements of this goal include a nod toward important ongoing programs, some of the most important work to be done is included in CE Goal 1.6:

> Protect the +/-88,000 acres of remaining prime farmland in Skagit County. Success requires continued commitment to restrictive farmland zoning; continued farmland development right acquisition through the Farmland Legacy Program; **support for an adequate water right necessary to sustain Skagit Agriculture; and an integrated, strategic investment plan in partnership with Skagit tribes and diking/drainage districts, to holistically address sea level rise, habitat enhancement, and farmland preservation on the Skagit/Samish Delta downstream of the Wild & Scenic portion of the Skagit River.**

For decades, Skagitonians has been a proud partner to the County in our work to protect farmland. Our future depends on supporting the water rights and integrated planning required to ensure climate resiliency and continued agriculture. We cannot agree more, and we endorse this addition to the Comprehensive Plan.

Additional language in this section further underscores the importance of integrated planning for water security in a climate uncertain future:

> CE Goal 9.0: **Support long-term water security needs through integrated natural resource management planning and implementation.**
>
> CE Goal 9.4: **Support and advocate for an adequate uninterruptible water right for Skagit Agriculture at a point of withdrawal downstream of the Wild and Scenic portion of the Skagit River.**

On a related note, the Climate Integration Element includes language that further supports the idea that irrigation and drainage infrastructure is a vital part of planning for a viable future:

> 4A-5.6 Drainage Plans: Minimize and mitigate flooding and drainage impacts on agricultural lands. **Implement enhanced drainage management practices designed to mitigate the projected impacts of extreme precipitation intensity on agricultural lands. These practices could include the installation of adaptive drainage infrastructure such as improved culverts, ditches, and water retention systems to prevent flooding and waterlogging of crops.**

Again, we agree with the intent behind this language, and we support it being called out as a priority for County action.

Skagitonians also was pleased to see language in the Climate Element that address the need to carefully examine where renewable energy facilities are sited. We appreciate the moratorium on electrical energy generation or storage facilities on Skagit farmland recently enacted by the County Commissioners. This was an important stopgap measure. But a larger question needs to be resolved: how can Skagit County best meet current and future energy needs while protecting agricultural lands?

The language of Climate Element 2.4 points us in the right direction: "**Identify areas in the County that are appropriate for siting renewable energy generation and storage facilities that prioritize protection of Natural Resource Lands.**"

We support this addition and appreciate that it has been called out as a priority within the context of the County's climate response.

Thank you for the opportunity to comment on these elements of the 2025 Comprehensive Plan Update. We look forward to reviewing further elements of the plan and working with the County to ensure the long-term viability of Skagit agriculture.

Sincerely,

Kim Good Rubenstein

Mary Manko

Kim Good Rubenstein
President, Board of Directors
Skagitonians to Preserve Farmland
414A Snoqualmie Street
Mount Vernon, WA 98273