



David Radabaugh, Shoreline Planner  
Washington Department of Ecology  
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RE: Tukwila SMP Update

I am writing in representation of the Green-Duwamish Watershed Alliance. We are in support of Tukwila's proposed Shoreline Master Program. Since much of Tukwila's shoreline is located within the Duwamish transition zone where juvenile salmon osmoregulate to exist in salt water, it is a high priority protection and restoration area within WRIA 9.

We know from the extensive ecological economics evaluation done in support of the WRIA 9 Plan that protection and restoration investments made in the urban area provide valuable ecological goods and services at a lower cost than engineered solutions such as storm water facilities. It is therefore essential that shoreline regulations provide opportunities for buffers, riparian vegetation, levee setbacks, and low impact development, which affects both the quality and the quantity of water entering the river.

Reducing the amount of shoreline armoring is imperative for diverse riparian habitat. Section 9.6 addresses this by stating that Shoreline protection shall not be considered an outright permitted use and shall be permitted only when it has been demonstrated through a Riverbank Analysis and Report that shoreline protection is necessary for the protection of existing legally established structures and public improvements.

We strongly support the buffer widths in section 10.9 (C) Wetland Watercourse, and Fish and Wildlife Habitat Conservation Area Buffers. Buffers that protect ESA listed species such as Chinook salmon are key to reducing the impact of urban development on salmon and other watershed resources.

The updated regulations are imperative to a healthy, functioning river and we support them as written. We encourage the Department of Ecology to approve the updated Tukwila SMP so that it can be put in place and effectively implemented.

Sincerely,

Brooke Alford, President, Green-Duwamish Watershed Alliance