

undertake a restoration action. Some specific guidance materials are also listed in Chapter 8, Website Resources.

2. Grant Applications: Programs and projects (either specific or general) included in this Restoration Plan may find it easier to obtain grant funding if the project is included in a publicly vetted and adopted plan.
3. Mitigation: In those circumstances where off-site mitigation may be necessary, this document can provide a source of programmatic ideas or specific projects that maximize the effect of the mitigation regionally.

Depending on the scale and type of project, property owners and interest groups wishing to conduct a restoration action may need to obtain permits from the County and/or Cities, as well as Washington Department of Fish and Wildlife, Washington Department of Ecology, Washington Department of Natural Resources, and/or the U.S. Army Corps of Engineers. In shoreline jurisdiction, the project would need to comply with the County's and Cities' Shoreline Master Program, including the incorporated critical areas regulations. Also depending on the scale and type of project, professionals, including biologists or engineers, may need to assist in project development.

2 SHORELINE INVENTORY AND ANALYSIS REPORT SUMMARY

The County and Cities recently completed a draft comprehensive inventory and analysis of their shorelines (June 2014) as an element of the SMP update. Whitman County adopted its existing SMP in 1974, and it has not been updated since that time. The Cities have each adopted the County's current SMP. The information provided in the *Draft Shoreline Analysis Report for Shorelines in Whitman County; the Cities of Colfax, Palouse, Pullman and Tekoa; and the Towns of Albion, Malden and Rosalia* (The Watershed Company and Berk 2014) (herein referred to as "Analysis Report") will be used to update the SMP. Shoreline uses, developments, and activities are also subject to the County's and Cities' Comprehensive Plans, development regulations, and various other provisions of County, City, State and Federal laws, as well as other codes and policies.

The purpose of the shoreline inventory and analysis was to gain a greater understanding of the existing condition of the County's and Cities' shoreline environment to ensure the updated SMP policies and regulations will protect local ecological processes and functions. The Analysis Report describes existing physical and biological conditions in

shoreline jurisdiction. A summary of the current regulatory framework is included as well as existing shoreline conditions, an analysis of ecological functions and ecosystem-wide processes, land use, and public access. A map folio of the shoreline inventory results is also included as Appendix B of the Analysis Report.

The Analysis Report is divided into seven main sections: Introduction, Summary of Current Regulatory Framework, Summary of Existing Ecosystem Conditions, Shoreline Inventory, Analysis of Ecological Functions, Land Use Analysis, and Shoreline Management Recommendations. Most of these chapters were subdivided into separate sections for the County and Cities. Ecosystem-wide discussions were broken into the three major Water Resource Inventory Areas (WRIAs) located within Whitman County: WRIA 34- Palouse, WRIA 35- Middle Snake, and WRIA 56- Hangman (Latah) Creek. Results of the Analysis Report are summarized below to provide context for this Restoration Plan. A map of the WRIAs in Whitman County is located in Appendix A.

2.1 Shoreline Jurisdiction

As defined by the Shoreline Management Act of 1971, shorelines include certain waters of the state plus their associated “shorelands.” At a minimum, the waterbodies designated as shorelines of the state are streams whose mean annual flow is 20 cubic feet per second (cfs) or greater, lakes whose area is greater than 20 acres, and all marine waters. Ecology has identified the upstream limits of shoreline streams and rivers based on projected mean annual flow of 20 cfs (Higgins 2003), and those lakes that are 20 acres or greater in size.

Shorelands are defined as:

“those lands extending landward for 200 feet in all directions as measured on a horizontal plane from the ordinary high water mark; floodways and contiguous floodplain areas landward 200 feet from such floodways; and all wetlands and river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of this chapter...Any county or city may determine that portion of a one-hundred-year-floodplain to be included in its master program as long as such portion includes, as a minimum, the floodway and the adjacent land extending landward two hundred feet therefrom... Any city or county may also include in its master program land necessary for buffers for critical areas (RCW 90.58.030)”

The County’s and Cities’ shoreline management area includes the shorelines of 12 lakes, the Palouse River, South Fork Palouse River, Rock Creek, Cottonwood Creek, Fourmile Creek, Hangman Creek, Pine Creek, Union Flat Creek and the Snake River. In total, the

shoreline inventory mapped approximately 464 miles of river/stream shoreline and 40 miles of lake shoreline that meet shoreline jurisdiction criteria. Total jurisdictional shoreland area equals approximately 29 square miles, which includes associated wetlands, floodways, and portions of associated floodplains.

2.2 Existing Conditions Summary

Unincorporated areas make up most of the County territory and the majority of the County's shorelines are rural and agricultural in nature. City shorelines are generally more developed, predominantly in the largest cities of Pullman and Colfax where the majority of housing, commercial and industrial activities are centered. Findings of existing shoreline conditions and functions provided in the Analysis Report are briefly summarized below by WRIA. For reach-level detail of each shoreline waterbody, please refer to the full Analysis Report.

2.2.1 County Shorelines

WRIA 34- Palouse

The topography of the Palouse watershed transitions from mountainous terrain in Idaho to rolling hills composed of basalt covered with loess in the central portion of the watershed. The far western portion of the watershed is in an area called the Channeled Scablands. This area was shaped by massive floods over the past million years, which left behind exposed channels of the underlying basalt amongst islands of loess (HDR and EES 2007). Historically, the dominant vegetation in the Palouse watershed was a bunchgrass association. Much of that vegetation has been converted to dryland agriculture or altered by rangeland uses. Soil erosion resulting from storm water runoff has been a continuing problem throughout WRIA 34 as a result of land conversions to agriculture. An estimated 40% of the topsoil in the Palouse has been lost to erosion during this time (HDR and EES 2007). Most livestock grazing occurs in the westernmost portion of the basin, within the Channeled Scablands. Urban development makes up a small portion of the watershed.

Riparian areas have been significantly altered by land use in the South Fork Palouse subbasin, and many small intermittent streams have been converted to drainage ditches throughout the North and South Fork subbasins.

Lakes

Twelve shoreline lakes occur in the Palouse Watershed, all located in the northwest quadrant of the County. Many of the lakes are natural depressions with basalt bottoms

and no outlets (HDR and EES 2007). The level of existing and potential future development surrounding the lakes is generally low and functions are largely unaltered.

Palouse River

Shoreline conditions vary greatly throughout the Palouse River shorelines, from steep cliffs and canyons in the lower reaches, to forested meanders through the center of the County. The majority of shorelands are undeveloped outside of agricultural uses, which are the predominant cause of shoreline degradation. Functions are most impaired in the industrial area northwest of Colfax.

There are no ESA-listed salmonids or other listed aquatic species above the Palouse Falls. Upstream of the falls, resident rainbow trout are present. Downstream of the falls, there is documented presence of Dolly Varden/bull trout, summer steelhead and fall Chinook in some reaches.

South Fork Palouse River

Hydrologic functions are generally the highest functions of this waterbody due to extensive floodplain and some floodway and generally good connections to the channel. Vegetation and habitat functions are limited mainly by modifications from agricultural use. Narrow riparian vegetation separates the agriculture fields and associated development from the river in most places and roads or development are also present in all reaches. No anadromous fish use is documented.

Rock Creek

Rock Creek flows southwest through the northwest corner of the County. It briefly enters Adams County and then re-enters Whitman County and flows south parallel to the County's western border until it converges with the Palouse River west of Endicott. There are no ESA-listed salmonids documented in Rock Creek, but rainbow trout are documented throughout all reaches. Shorelines are largely unaltered except for some agricultural modifications primarily in the lower creek. High amounts of wetland are present however, vegetation is naturally limited by the basalt landscape throughout the region.

Cottonwood Creek

Only the very western end of Cottonwood Creek, near the confluence with Rock Creek, meets jurisdictional requirements. A fairly large area of potentially associated wetlands (PAW) abutting the creek are also within jurisdiction. High hydrologic function is present overall. No armoring or overwater structures are present though the channel has

a generally simple structure with few backwater areas or meanders. However, a high percentage of wetland is present.

Agricultural uses are the main modifications to shoreline function. Most of the PAW is in agricultural use. The narrow channel of the creek itself has herbaceous vegetation present within it in places but trees and shrubs are limited throughout most of the creek and PAW.

Fourmile Creek

The portion of Fourmile Creek directly east of the convergence with the South Fork of the Palouse meets the jurisdictional threshold. The reach runs through primarily agricultural lands which are the primary modification to functions in this reach. No other development is present except for roads.

The creek's shorelines function highly for moderating sediment transport and attenuating flow energy due to a significant amount of floodplain with good connectivity to the channel and little armoring present. Shoreland area is dominated by cultivated crops which have limited the width of natural vegetation. No wetlands are mapped.

Pine Creek

The lower portions of Pine Creek shorelines are heavily agricultural with limited riparian vegetation while the upper portions are less altered with more woody vegetation present and less agricultural impact in the shorelands. One area just outside of Rosalia includes a wastewater treatment facility. Agricultural uses and loss of riparian vegetation are the primary functional impairments. A high percentage of floodplain and some floodway are present in the lower reaches but are limited in the upper reach where vegetation cover is greater.

Union Flat Creek

Union Flat Creek is a tributary to the Palouse River. It flows west through the central portion of Whitman County, entering the Palouse just northwest of Lacrosse. No anadromous salmonid species are documented in the creek. Portions of the creek flow through a canyon through the scabland region while other areas flow through regions with a very narrow area of riparian vegetation with shorelands dominated by agricultural fields. The upper portion of the creek has a somewhat wider area of riparian vegetation including areas of sparse evergreen forest. Rainbow trout are documented throughout.

WRIA 35- Middle Snake

Historically, the Middle Snake River watershed was covered by prairie and canyon grasslands and shrub-steppe at low to mid-elevations. Forests dominated as elevation and proximity to the Blue Mountains increased (Kuttel 2002). As a result of land use changes and development, much of the prairie, shrub-steppe, and riparian habitats have been lost or modified. Conversion of perennial bunchgrass prairies to production of annual crops has led to significant quantities of fine sediment erosion and deposition in WRIA 35 streams. Floodplains throughout WRIA 35 have been converted to agricultural and residential use. This development has resulted in channel straightening, armoring, and simplification (Kuttel 2002).

The Snake River contributes about 20 percent of the Columbia River flow (Snake River Salmon Recovery Board 2011). Stream flows are controlled by the hydropower system, as well as seasonally variable flows in smaller tributaries corresponding with winter precipitation and spring snowmelt. The hydrology along the Snake River has been severely altered by the installation of hydroelectric dams. The dams were built to provide hydroelectric power, river navigation, irrigation water, and flood control. Two Corps operated dams, Little Goose Dam and Lower Granite Dam are located in Whitman County.

The channel in most areas has steeply sloped banks or is within steep-sided canyons with limited vegetation. A railroad prism and associated armoring limits shoreline functions and natural cliffs limit vegetative and hyporheic functions throughout much of the shoreline. However, cliffs and bluffs provide unique upland habitats and waterfowl concentration areas are present throughout. Several parks and recreation areas are present where riparian vegetation is denser and/or wider, usually where banks are less steep.

Industrial uses are also present including the two dams mentioned above. Dam operations retain sediment and result in seasonal and daily fluctuations in water levels. Industrial development and associated armoring, lack of vegetation and development impairs the shorelines in these areas.

WRIA 56- Hangman Creek

Hangman Creek flows through sedimentary hills of sand, gravel and cobbles deposited during the Lake Missoula floods (Spokane County Conservation District (SCCD) 2005). Hangman Creek historically supported a tribal salmon fishery upstream of the Town of Tekoa (Edelen and Allen, 1998 in SCCD 2005). However, as vegetation was cleared and soils were tilled to accommodate agriculture in the late 1800s, stream conditions became

degraded. Today, agriculture is the predominant land use in the upper and middle reaches of the Hangman Creek watershed. Removal of riparian vegetation has resulted in increased bank erosion and stream siltation. Forestry practices in the upper watershed have altered stream flows, increasing peak flows and lowering summer low-flows.

Hangman Creek has degraded water quality and is on the 303(d) list for dissolved oxygen and has a Category 4a listing (TMDL in place) for bacteria and temperature. No anadromous fish presence is documented. Agriculture is a significant land use in this area and is the primary modification to the Hangman Creek shorelines. Development of agriculture has led to a reduction of natural riparian vegetation and altered channel structure.

2.2.2 Cities and Towns

Albion

Albion lies within WRIA 34. The South Fork of the Palouse River flows north through the town. It crosses the southwest corner of the City. Shorelands are primarily undeveloped but some residential and industrial development is present. Agricultural uses are dominant. All reaches have a water quality Category 4a listing for bacteria.

Colfax

Colfax lies within WRIA 34. The north and south forks of the Palouse River meet in the city. The north fork meanders through recreational, residential, and agricultural uses before entering a concrete flume. Most of the south fork meanders through more dense residential and commercial areas and is contained within a concrete flume for most of its length. Downstream of the confluence, the Palouse River continues along some minor residential uses and primarily industrial uses.

All reaches have some level of functional impairment. The highest functioning area is on the northwest edge of the city where scrub shrub vegetation is most intact, armoring is lacking, substantial areas of floodplain and floodway and a wetland fringe are present. However, the proximity of the reach to intense development and alteration on the opposite bank, as well as the presence of the railroad at the upland edge of the reach, limits function. A flume and levees through the center of the City, as well as upland commercial and industrial development, have a strong, adverse impact on processes and functions in much of the City.

Malden

Malden lies within WRIA 34. Pine Creek flows west through the northern half of the City. Shorelands are primarily in agricultural use with occasional sparse scrub/shrub or forested vegetation scattered along the reach, mostly in the western half. Generally a narrow band of dense herbaceous vegetation separates the channel from cultivated crops which dominate the shorelands. Trees or shrubs are occasionally present helping to provide bank stabilization. Moderate habitat function is present as there is very little development and some wetland and riparian habitat is present. There is also undisturbed connectivity between the channel and evergreen forest located upslope.

Palouse

Palouse lies within WRIA 34. The Palouse River meanders north and continues flowing west through the center of the City. The most impaired area is the industrial and commercial shorelines through the downtown area. Even in these most impacted areas, the banks of the river are well vegetated with trees and shrubs in places; however, the shorelands upland are almost all developed a narrow band of shoreline vegetation is all that separates the channel from the development.

Pullman

Pullman lies within WRIA 34. The South Fork of the Palouse River flows northwest through the City. The first two reaches heading upstream (Industrial and Commercial/Business District) pass through the most developed areas of the town, with a number of crossings, narrower riparian corridor, and high impervious surface. The next reach (Parks) contains more open space, active recreational lands, and scattered pockets of more intense commercial development. The most upstream reach is South Commercial. Similar to the Industrial reach, this reach has some intense commercial developments, but these are separated from the stream by wider riparian corridors generally. The Residential reach is composed of a number of scattered segments, most of which do not directly abut the river, but are separated from the river by other reaches.

Rosalia

Rosalia lies within WRIA 34. Pine Creek flows north through the western half of the city. It then briefly enters Spokane County before turning and continuing back southwest into Whitman County toward Malden. This southwest flowing portion of Pine Creek shoreline jurisdiction encompasses a small piece of the parcel containing the Town of Rosalia airport located directly west of the Town. Other portions of the shoreline include city parks, residential and agricultural uses.

Tekoa

Tekoa lies within WRIA 56. Hangman Creek flows northwest through the city. The shorelines in the northwest portion of the City flow through a rural residential area with the highest function relative to the other reaches. Also fairly high functioning is the portion of the creek that meanders through open space in the southern end of the City. Habitat function is highest in these reaches. The least amount of development is present and the riparian corridor provides some connectivity between habitat types including forested areas. These areas have narrow but dense herbaceous vegetation present along the channel with occasional shrubs and trees providing filtration and stabilization functions. The lowest functioning area is in the middle of the City which is impacted from commercial and urban residential development.

3 RESTORATION GOALS

The following subsections discuss restoration goals and objectives previously identified in local planning efforts. Discussions are broken into the three WRIAs and Cities when applicable.

3.1 County Wide

3.1.1 Comprehensive Plan and Critical Areas Regulations

The County's Comprehensive Plan, amended most recently in 2010, contains the following goals specific to protecting and restoring natural resources:

- Minimizing degradation of existing natural areas and preserving designated critical areas.
- Using State Environmental Policy Act (SEPA) review to ensure that development does not adversely impact natural resources, include water resources and critical or sensitive areas.

The County has critical areas regulations that are designed to implement the goals, policies, guidelines, and requirements of the County Comprehensive Plan and Growth Management Act. The Critical Areas Ordinance (CAO) (Whitman County Code (WCC) Chapter 9.05) aims to limit development and alteration of critical areas. Relevant goals contained in the CAO include:

- Maintain healthy, functioning ecosystems through the protection of unique, fragile, and valuable elements of the environment, including ground and surface

waters, wetlands, fish and wildlife and their habitats, and to conserve the biodiversity of plant and animal species;

- Direct activities not dependent on critical areas resources to less ecologically sensitive sites and mitigate unavoidable impacts to critical areas by regulating alterations in and adjacent to critical areas; and
- Prevent cumulative adverse environmental impacts to water quality, wetlands, fish and wildlife habitat, and the overall net loss of wetlands, frequently flooded areas, and habitat conservation areas.

3.1.2 **County Conservation Districts**

Four conservation districts are active in Whitman County, and each has developed work plans and priorities to address their mission of promoting natural resource conservation. A map of the boundaries of the conservation districts operating in Whitman County is located in Appendix A.

Whitman Conservation District

The Whitman Conservation District has a 5-Year Plan (2010 to 2015) which lists specific 2015 natural resource priority goals that include outreach, education, livestock management to protect streams through participation by livestock managers, review of financial incentives, noxious weed control, and actions through the Conservation Reserve Program. Pertinent general goals are further defined in the FY2014 Annual Work Plan as follows:

“Water Quality: By June 2018 have a demonstrated increase in: participation by livestock operators to have a plan in place addressing water quality issues; riparian areas along streams managed efficiently, runoff from livestock feeding areas eliminated; increase awareness of CREP [Conservation Reserve Enhancement Program] and CCRP [Continuous Conservation Reserve Program] programs to buffer waterways; reduction of most regulators’ concerns in the District

Livestock: By June 2018 have a demonstrated increase in: Partnering with the 5 Star Watershed Stewardship program; collaborate with Whitman County Extension and Whitman County Cattlemen Association on grazing alternatives; increase public perception of the positive aspects of ranching on private and public land; increase the public awareness to the benefits of cohabitation for wildlife and livestock; increase awareness of best management practices by ranchers; reduce regulators’ concerns in well managed livestock operations”

Palouse Rock Lake Conservation District

The Palouse Rock Lake Conservation District has a 5-Year Plan and 2014 Annual Work Plan addressing natural resource priorities related to restoration. Specific goals targeted for 2015 are:

- “Develop plantings for protection of soil and for wildlife habitat
- Increase acres of contour grass buffer strips from the current of approximately 40% up to 50%
- Increase acres of riparian buffer strips from 15% to 50% of the eligible riparian acres to help move cattle in riparian feeding areas away from the streams and rivers
- Increase documentation of water quality and quantity improvements that are achieved
- Have 95% of all identified AFO/CAFO [Animal Feeding Operations/Confined Animal Feeding Operations] issued resolved
- 80% of all the cattle will be located in feeding areas away from the streams and rivers
- Plans that treat water quality will be completed and 50% of the cooperators will be in compliance with water quality standards for nutrients and sedimentation
- Enhance off-site watering facilities for livestock and wildlife”

Palouse Conservation District

The Palouse Conservation District Fiscal Year 2014 Annual Work Plan lists the Conservation District’s most current goals and objectives for each of its natural resource priority program areas. Overarching goals for each pertinent program area are as follows:

- “Soil and Health Erosion Control: Demonstrated improvement in soil health including reduction in erosion as a result of people assisted, conservation plans developed and conservation practices implemented.
- Water Quality: Demonstrated improvement in water quality measures for water bodies in the Palouse CD including reduction in sediment, fecal coliform, temperature as a result of people assisted, conservation plans developed and conservation practices implemented.
- Replenishing the Landscape (habitat, vegetation, prairie): Demonstrated improvement in replenishing the landscape including habitat, vegetative cover,

Palouse Prairie, as a result of people assisted, conservation plans developed and conservation practices implemented

- Weed Control: Demonstrated improvement in weed control and technical assistance for district projects as a result of people assisted, weed control practices implemented
- Small Acreage Issues: Demonstrated improvement in small acreage conservation issues as a result of people assisted, conservation plans developed and conservation practices implemented
- Education/Outreach: Demonstrated improvement in conservation awareness and interest as a result of educational and outreach events, increased partner agencies and organizations involved and media coverage”

Pine Creek Conservation District

Finally, the Pine Creek Conservation District, which covers a portion of the Hangman Creek watershed, lists the following relevant goals in its 5-Year Plan 2011-2016:

- Reduce erosion and improve water quality by providing technical assistance to an average of 10%, annually, of district farm operators.
- Prepare a detailed inventory of livestock operations and have all identified operations complete livestock/water quality plans.
- Seek out and apply for funding to implement a comprehensive cost- share program for direct seed/reduced tillage activities.
- Increase direct seeded and reduced tillage acres to 50% of farmland in the district.
- Perform a quality check on approximately 5% (annually) of the CRP acres in the district by cooperating with NRCS through the TSP program.

3.2 WRIA 34

WRIA 34 watershed planning efforts are detailed in the Palouse Watershed Plan (HRD/EES 2007). Some of the relevant basin-wide goals outlined in the plan are:

- Emphasize voluntary, incentive-based management that use existing water conservation programs.
- Support use of urban and rural land BMPs.
- Conduct water resource management education and outreach, addressing such topics as water quality, conservation, and BMPs.

- Restore and enhance floodplains, riparian areas, and wetlands with a focus on improving water quality, providing habitat, and reducing severity of flood events.
- Review and update land use plans and regulations to be compatible with and support resource management goals.
- Establish funding for long-term monitoring and evaluation of watershed plan implementation.
- Protect surface and groundwater quality for aquatic habitat.
- Manage stormwater in urban and rural areas to improve water quality.
- Review water quality standards and establish natural temperature levels for streams that reflect watershed conditions.

3.3 WRIA 35

The Snake River Salmon Recovery Board completed the final Snake River Salmon Recovery Plan for SE Washington in 2011 (Snake River Salmon Recovery Board 2011). The Plan details steelhead and chinook recovery and restoration goals, including “broad sense” goals that take into consideration economic, social, and ecological values, as well as legislative mandates. The Plan’s vision statement includes:

- Meeting recovery goals established by NMFS for listed populations of anadromous fish species and by U.S. Fish and Wildlife Service for bull trout,
- Achieving healthy and harvestable populations of listed species in affected subbasins, and
- Realizing these objectives while recognizing that local culture and economies (agriculture, urban development, logging, power production, recreation, and other activities) are beneficial to the health of the human environment within the recovery region.

Restoration goals (Chapter 4 of the plan) are presented as target abundance of adult salmonids, and limiting factors that affect habitat are identified to guide efforts to address threats. Specific goals for each management unit are presented in Table 6-1 of the plan.

3.4 WRIA 56

The Hangman (Latah) Creek’s Watershed Planning Unit, representing local residents, governmental agencies, tribes, and other watershed stakeholders, developed a Water

Resources Management Plan in 2005 (Hangman (Latah) Creek Watershed Planning Unit 2005)). The Plan defined broad goals and more specific objectives that build upon the earlier phases of watershed planning. Relevant goals and objectives are:

Goals (objectives):

- Improve water quality. Work toward meeting and maintaining Washington State Class A and EPA water quality criteria for all parameters and beneficial uses; Reduce nutrient and waste loading from point and non-point sources; collaborate with partners, including Ecology, in developing TMDLs for pollutants exceeding Class A criteria.
- Reduce suspended sediment loading. Maintain and enhance floodplain functions and values; assess and encourage landowners to reduce erosion; assess current conditions and encourage the improvement of riparian areas and wetlands; evaluate stormwater management practices and make recommendations.
- Maintain and Enhance Fish and Wildlife Habitat. Promote and encourage the planting of native vegetation along stream banks; assess instream flow needs.

3.5 Pullman

The City of Pullman's *Comprehensive Plan* (1999) includes specific goals and policies that would contribute significantly to improvements in ecological function in the City, including:

"GOAL P4: Complete and protect a system of green belts, centered on streams and wildlife corridors, to protect natural resources and provide passive recreation."

"GOAL LU8: Protect, enhance, and wisely utilize Pullman's natural resources."

"GOAL LU9: Preserve wetlands, riparian areas, and significant plant and wildlife habitat."

"Goal LU13: Preserve shoreline areas, while assuring public access to the water."

3.6 Palouse

The Palouse Comprehensive Plan, adopted in 1997, includes an Environment element with the goal to "improve, protect and/or improve Palouse's natural environment". The Comprehensive Plan is currently in the process of being updated. The draft update