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TOWN OF SOUTH PRAIRIE

GRANT No. 1000069

CUMULATIVE IMPACTS ANALYSIS

**for Town of South Prairie's Shoreline: South Prairie
Creek**

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CUMULATIVE IMPACTS ANALYSIS

TOWN OF SOUTH PRAIRIE SHORELINE: SOUTH PRAIRIE CREEK

1 INTRODUCTION

1.1 Shoreline Management Act Requirements

The Shoreline Management Act guidelines (Guidelines) require local shoreline master programs (SMPs) to regulate new development to “achieve no net loss of ecological function.” The Guidelines (WAC 173-26-186(8)(d)) state that, “To ensure no net loss of ecological functions and protection of other shoreline functions and/or uses, master programs shall contain policies, programs, and regulations that address adverse cumulative impacts and fairly allocate the burden of addressing cumulative impacts.”

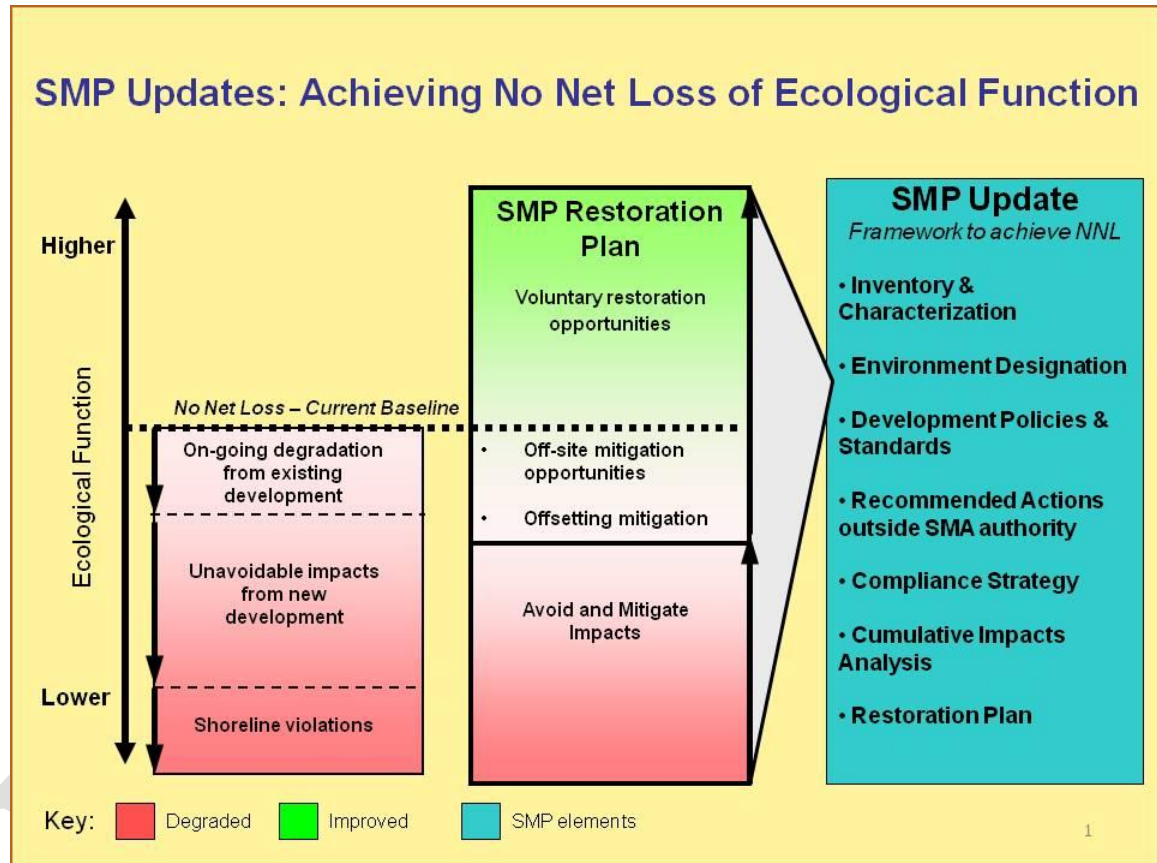
The Guidelines further elaborate on the concept of net loss as follows:

“When based on the inventory and analysis requirements and completed consistent with the specific provisions of these guidelines, the master program should ensure that development will be protective of ecological functions necessary to sustain existing shoreline natural resources and meet the standard. The concept of “net” as used herein, recognizes that any development has potential or actual, short-term or long-term impacts and that through application of appropriate development standards and employment of mitigation measures in accordance with the mitigation sequence, those impacts will be addressed in a manner necessary to assure that the end result will not diminish the shoreline resources and values as they currently exist. Where uses or development that impact ecological functions are necessary to achieve other objectives of RCW 90.58.020, master program provisions shall, to the greatest extent feasible, protect existing ecological functions and avoid new impacts to habitat and ecological functions before implementing other measures designed to achieve no net loss of ecological functions.” [WAC 173-206-201(2)(c)]

In short, updated SMPs shall contain goals, policies and regulations that prevent degradation of ecological functions relative to the existing conditions as documented in that jurisdiction’s characterization and analysis report. For those projects that result in degradation of ecological functions, the required mitigation must return the resultant ecological function back to the baseline. This is illustrated in the figure below. The jurisdiction must be able to demonstrate that it has accomplished the goal of “no net loss” through an analysis of cumulative impacts that might occur through

implementation of the updated SMP. WAC 173-26-186(8)(d) states “[e]valuation of such cumulative impacts should consider:

- (i) current circumstances affecting the shorelines and relevant natural processes;
- (ii) reasonably foreseeable future development and use of the shoreline; and
- (iii) beneficial effects of any established regulatory programs under other local, state, and federal laws.”



Source: Department of Ecology

As outlined in the *Shoreline Restoration Plan* (Appendix C of the SMP) prepared as part of this SMP update, the SMA also seeks to restore ecological functions in degraded shorelines. This cannot be required by the SMP at a project level, but Section 173-26-201(2)(f) of the Guidelines says: “master programs shall include goals and policies that provide for restoration of such impaired ecological functions.” See the *Shoreline Restoration Plan* for additional discussion of SMP policies and other programs and activities in the Town that contribute to the long-term restoration of ecological functions relative to the baseline condition.

1.2 Methodology

Using the textual, numerical and graphical information developed and presented in the *Shoreline Analysis Report*, this cumulative impacts analysis was prepared consistent with direction provided in the Guidelines as described above. To the extent that existing information was sufficiently detailed and assumptions about possible new or re-development could be made with reasonable certainty, the following analysis is quantitative. However, in many cases information about existing conditions and/or redevelopment potential was not available at a level that could be assessed quantitatively or the analysis would be unnecessarily complex to reach a conclusion that could be derived more simply. Further, ecological function does not have a simple metric. For these reasons, much of the following analysis is more qualitative than quantitative.

2 EXISTING CONDITIONS

The following summary of existing conditions is based on the *Shoreline Analysis Report*. Environment designations include Urban Conservancy, High Intensity, Shoreline Residential, and Aquatic (see Appendix A of the SMP for a map of environment designations). The *Shoreline Analysis Report* includes an in-depth discussion of the topics below, as well as information about transportation, stormwater and wastewater utilities, impervious surfaces, and historical/archaeological sites, among others.

The South Prairie Creek shoreline is primarily dominated by residential uses, although some commercial and public uses are also present. Residential uses consist exclusively of single-family residences. The entirety of the upland shoreline has been given an environment designation of Urban Conservancy.

South Prairie Creek has been divided into two assessment units based on variations in land use and ecological condition. Land use conditions in each assessment unit can be found in Table 5 of the *Shoreline Analysis Report*. Some shoreline armoring is present, and forest cover is patchy along the stream. Ecological functions are moderate to high, and floodplain functions are particularly high in the southern assessment unit. Detailed information about existing functions, including a performance rating of individual assessment unit, can be found in the *Shoreline Analysis Report*, Section 4.3.

3 DEVELOPMENT POTENTIAL

Two shoreline assessment units were identified within the Town (see Section 3.3 of the *Shoreline Analysis Report*) based primarily on location, as well as biological character and dominant land use. Assessment units were then assigned environment designations based upon the performance of biological functions and anticipated future land uses.

The following table is based on material included in Chapter 5 of the *Shoreline Analysis Report*.

Table 1. Likely changes in land use and implications for shoreline management.

| Assessment Unit/Zoning Area | Likely Changes in Land Use |
|--|---|
| Upstream South Prairie Creek | |
| Residential District Zoning (R) | This area encompasses the majority of the assessment unit and includes approximately 15 residential parcels. Most of the parcels are developed at low densities, while one of the parcels includes the RV park. Four parcels are undeveloped and could be developed in the future and up to 9 of the parcels could be further subdivided. However, due to the current sewer moratorium, new development and/or subdivision are unlikely and redevelopment of existing structures is the more likely scenario. |
| Government/Utilities | This area includes Veteran’s Park. |
| Parks/Trails/Open Space | This area includes the Foothills rail-to-trail west of the stream as well as the railroad bridge and a small undeveloped portion on the east side of the stream. |
| Areas Waterward of the OHWM | No changes. |
| Downstream South Prairie Creek | |
| Residential District Zoning (R) | This area encompasses the majority of the assessment unit and includes approximately 16 residential parcels. Most of the parcels are developed at appropriate densities. Three parcels are undeveloped and could be developed in the future and up to 8 of the parcels could be further subdivided. However, due to the current sewer moratorium, new development and/or subdivision are unlikely and redevelopment of existing structures is the more likely scenario. |

| Assessment Unit/Zoning Area | Likely Changes in Land Use |
|---------------------------------------|--|
| Commercial District Zoning (C) | This area is made up of a single residential parcel and two parcels which consist of an existing gas station. Subdivision of land and/or new development is unlikely. However, redevelopment of existing structures is the most likely scenario. |
| Parks/Trails/Open Space | This area consists of an undeveloped privately owned lot along the northern Town limits. Due to its proximity to the stream, this area is unlikely to see new development. |
| Areas Waterward of the OHWM | No changes. |

4 PROTECTIVE SMP PROVISIONS

4.1 Environment Designations

The first level of protection provided by the SMP is the recognition of two different shoreline environment types in South Prairie: Urban Conservancy and Aquatic. The town accommodates a mix of uses and structures, none of which are water-dependent. Overall, the shoreline maintains a moderate amount of ecological function and little growth is expected in the foreseeable future. For these reasons, a single upland environment designation has been given to the entire Town. Table 2 (Table 3.1 in the SMP) below identifies the prohibited and allowed uses and modifications in each of the two shoreline environments.

Table 2. Shoreline Use and Modification Matrix (from Table 3.1 of the Shoreline Master Program)

| Legend: | Aquatic | Urban Conservancy |
|--|---------|-------------------|
| SD/E = Permitted, may be subject to Shoreline Substantial Development Permit or shoreline exemption requirements | | |
| CU = Shoreline Conditional Use | | |
| X = Prohibited; the use is not eligible for a Shoreline Variance or Shoreline Conditional Use Permit | | |
| -- = Not applicable | | |
| Agriculture | X | X |
| Aquaculture | X | X |
| Boating Infrastructure | | |
| Boat launch, private | X | X |

| | | |
|--|-----------------|-------------------|
| Boat launch, public | X | X |
| Marinas | X | X |
| Mooring buoys, mooring piles | X | X |
| Piers, docks | X | X |
| Breakwaters, jetties, rock weirs, groins | X | X |
| Clearing and grading | -- | |
| Commercial uses | | |
| Water-dependent uses | X | SD/E |
| Water-related | X | SD/E |
| Water-enjoyment uses | X | SD/E ¹ |
| Nonwater-oriented uses | X | X |
| Dredging | CU | -- |
| Fill ² | CU ³ | SD/E |
| Forest Practices | -- | X |
| Industrial Uses | | |
| Water-dependent uses | X | X |
| Water-related uses | X | X |
| Nonwater-oriented uses | X | X |
| Institutional | | |
| Water-oriented | X | X |
| Nonwater-oriented | X | X |
| In-Water Structures | CU | -- |
| Mining | X | X |
| Parking | | |
| Primary | X | X |
| Accessory | X | SD/E ⁴ |
| Recreational Uses | | |
| Water-dependent | SD/E | SD/E |
| Water-enjoyment | -- | SD/E |
| Nonwater-oriented | X | SD/E ⁵ |
| Residential Uses | | |
| Single-family | X | SD/E |
| Multi-family | X | SD/E |
| Shoreline Habitat and Natural Systems Enhancement Projects | SD/E | SD/E |
| Shoreline Stabilization | | |
| Bioengineering | CU | SD/E |
| Dikes, levees | X | X |
| Hard structural shoreline stabilization | CU | CU |
| Roads, railways | CU | SD/E |
| Utilities (primary) | CU | SD/E |

¹ Park concessions, such as small food stands, cafes, and restaurants with views and seating oriented to the water, and uses that enhance the opportunity to enjoy publicly accessible shorelines are allowed.

² Fill in the floodplain must meet all federal, state, and local flood hazard reduction regulations.

³ Fill in aquatic areas for the purposes of shoreline ecological restoration may be allowed as a permitted use if the Shoreline Administrator determines that there will be an increase in desired ecological functions.

⁴ Accessory parking is allowed in shoreline jurisdiction only if there is no other feasible option, as determined by the Town.

⁵ Nonwater-oriented uses may be allowed as a permitted use where the Town determines that water-dependent or water-enjoyment use of the shoreline is not feasible due to the configuration of the shoreline and water body or due to the underlying land use classification in the comprehensive plan.

4.2 General Policies and Regulations

The SMP contains numerous general policies, with supporting regulations (see SMP), intended to protect the ecological functions of the shoreline and prevent adverse cumulative impacts. These policies are summarized below.

- Policy 4.2.1.A: Shoreline use and development should be carried out in a manner that prevents or mitigates adverse impacts, both on site and to the extent that impacts may propagate up- or downstream, so that the resulting ecological condition does not become worse than the current condition.
- Policy 4.2.1.B: In assessing the potential for net loss of ecological functions or processes, project-specific and cumulative impacts should be considered.
- Policy 4.5.1.A: Where new developments and/or uses or redevelopments are proposed, native shoreline vegetation should be conserved to maintain shoreline ecological functions and/or processes. Vegetation conservation and restoration should be used to mitigate the direct, indirect and/or cumulative impacts of shoreline development, wherever feasible.
- Regulation 4.5.2.B: Vegetation clearing within shoreline jurisdiction shall be limited to the minimum necessary to accommodate approved shoreline development.
- Regulation 5.1.1.A: Development and uses should be designed in a manner that directs land alteration to the least sensitive portions of the site to maximize vegetation conservation; minimize impervious surfaces and runoff; protect riparian, nearshore and wetland habitats; protect wildlife and habitats; protect archaeological, historic and cultural resources; and preserve aesthetic values.
- Regulation 5.1.1.C: Development should be located, designed, and managed to minimize impacts on shoreline or upland uses through bulk and scale restrictions, setbacks, buffers, light shielding, noise attenuation, and other measures.

Table 3. Shoreline Development Standards (from Table 3.2 of the Shoreline Master Program)

| Legend: -- = Not applicable Note: All dimensions are in feet. | Aquatic | Urban Conservancy |
|---|---------|-------------------|
| Shoreline Buffer – All Uses | -- | 100-ft |
| Shoreline Lot Frontage Minimum – Residential | -- | 50-ft |
| Side Yard Setback Minimum – Residential | -- | 5-ft |
| Height | --- | 35-ft |

4.3 Shoreline Restoration Plan

As discussed above, one of the key objectives that the SMP must address is “no net loss of ecological shoreline functions necessary to sustain shoreline natural resources” (Ecology 2004). However, SMP updates seek not only to maintain conditions, but to improve them:

“... [shoreline master programs] include planning elements that when implemented, serve to improve the overall condition of habitat and resources within the shoreline area of each city and county (WAC 173-26-201(c)).”

The guidelines state that “master programs shall include goals, policies and actions for restoration of impaired shoreline ecological functions. These master program provisions should be designed to achieve overall improvements in shoreline ecological functions over time, when compared to the status upon adoption of the master program” (WAC 173-26-201(2)(f)). Pursuant to that direction, the Town has prepared a *Shoreline Restoration Plan*, which is a non-regulatory part of the SMP (Appendix C).

Practically, it is not always feasible for shoreline developments and redevelopments to achieve no net loss at the site scale, particularly for those developments on currently undeveloped properties or a new bulkhead. The *Shoreline Restoration Plan*, therefore, can be an important component in making up that difference in ecological function that would otherwise result just from implementation of the SMP. The *Shoreline Restoration Plan* represents a long-term vision for restoration that will be implemented over time, resulting in incremental improvement over the existing conditions.

The *Shoreline Restoration Plan* identifies a number of project-specific opportunities for restoration on both public and private properties inside and outside of shoreline jurisdiction, and also identifies ongoing Town programs and activities, non-governmental organization programs and activities, and other recommended actions consistent with a variety of watershed-level efforts. Based on the findings from the *Shoreline Analysis Report*, the restoration of riparian vegetation and edge habitat along South Prairie Creek are among the primary restoration objectives for the Town’s shorelines.

4.4 General Cumulative Impacts Assessment

The following table (Table 4) summarizes for each environment designation and corresponding waterbody the existing conditions, anticipated development, relevant Shoreline Master Program (SMP) and other regulatory provisions, and the expected net impact on ecological function. Certain special topics are discussed and analyzed in greater detail in Chapter 5 following the table. The discussion of existing conditions is based on the *Shoreline Analysis Report*, and additional analysis needed to perform this assessment.

In addition to the Urban Conservancy environment designation, the Aquatic designation will apply to those applicable areas of shoreline jurisdiction:

“Aquatic” Environment - The purpose of the “Aquatic” environment is to protect, restore and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark, including habitat, ecology, navigation and public enjoyment. An “Aquatic” environment designation will be assigned to shoreline areas waterward of the ordinary high-water mark.

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Table 4. General Cumulative Impacts Assessment.

| Environment Designation | Existing Conditions | Likely Development / Functions or Processes Potentially Impacted | Effect of SMP Provisions | Effect of Other Development and Restoration Activities / Programs | Net Effect |
|---------------------------------|---|---|---|--|---|
| <p>Urban Conservancy</p> | <p>The Urban Conservancy designation along South Prairie Creek includes the entirety of all upland areas within shoreline jurisdiction. This includes all residential uses, as well as Veteran's Park and the Foothills Trail.</p> <p>Shoreline armoring is present in several locations, but the majority of the shoreline is in a semi-natural state.</p> <p>The average existing setback of primary structures for the entire designation area is 100.2 feet, while the median setback is 75.5 feet.</p> | <p>Future Development: There is little likelihood of future changes through these shoreline areas. New development is almost certain to not take place, due to the sewer moratorium. Redevelopment/replacement of existing residences is more likely.</p> <p>Functions/Processes Impacted: Water Quantity: Slight changes to water quantity related to surface runoff may increase with redevelopment. However, all future development would adhere to stormwater management requirements.</p> <p>Water Quality: Future redevelopment is likely to result in improved water quality functioning through the addition of native plantings.</p> <p>Vegetation and Habitat: Future redevelopment and/or restoration activities are likely to result in improved vegetation and habitat conditions through the addition of native plantings.</p> | <p>SMP policies for the "Urban Conservancy" environment (SMP Section 3.2.4.C) include:</p> <ul style="list-style-type: none"> • Uses that preserve the natural character of the area or promote preservation of open space, floodplain, or sensitive lands either directly or over the long term should be the primary allowed uses. Uses that result in restoration of ecological functions should be allowed if the use is otherwise compatible with the purpose of the environment and the setting. • Standards should be established for shoreline stabilization measures, vegetation conservation, water quality, and shoreline modifications within the Urban Conservancy designation. These standards shall ensure that new development does not result in a net loss of shoreline ecological functions or further degrade other shoreline values. • Public access and public recreation objectives should be implemented whenever feasible and significant ecological impacts can be mitigated. • Water-oriented uses should be given priority over nonwater-oriented uses. <p>General vegetation conservation standards are discussed below in Section 5.1. Development regulations within the Urban Conservancy environment include a 100 foot buffer for all uses. (SMP Table 3.2)</p> | <p>Any in- or over-water proposals would require review not only by the Town of South Prairie, but also by the Washington Department of Fish and Wildlife (WDFW). A project that includes in-water fill would require review and permitting from the U.S. Army Corps of Engineers (Corps), and the Washington Department of Ecology, along with consultation with the National Marine Fisheries Service (NMFS). Each of these agencies is charged with regulating and/or protecting shorelines and would impose certain design or mitigation requirements on applicants.</p> <p>Work within the floodplain will require compliance with the new FEMA standards.</p> <p>As identified in the <i>Shoreline Restoration Plan</i> (Appendix C of the SMP), several opportunities for improvements to shoreline ecological function exist. These include:</p> <ul style="list-style-type: none"> • Riparian revegetation to address water quality and riparian vegetation issues; • Restoration of flood damaged stream banks, including the use of large woody debris; • Retention of existing shoreline vegetation during future development activities; • Revegetation of shoreline areas during future development activities; • Invasive species removal, including Japanese knotweed; • Improving floodplain connectivity. <p>These actions address the ecological functions assessed in the Restoration Plan, as well as the continuation of ongoing studies, projects and other efforts on South Prairie Creek.</p> | <p>SMP provisions, including setbacks, vegetation conservation standards, and Restoration Plan implementation, help ensure that environmental conditions in this environment will not be degraded relative to existing baseline over the long term. It will be critical to evaluate projects on a site-specific and project-specific basis, however, and utilize the available impact minimization and protective provisions of the SMP.</p> <p>Given strict adherence to the SMP policies and regulations, no net loss of ecological functions is expected as no detrimental or un-mitigated alterations to the existing conditions are likely to occur along the Urban Conservancy designated shorelines.</p> |

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5 DEVELOPMENT IMPLICATIONS

In addition to the general cumulative impacts analysis presented in Table 4 of Section 4, this section will expand on several key areas of functions and impacts associated with development and redevelopment of the South Prairie Creek shoreline.

5.1 Vegetation Conservation

Changes in vegetation are a significant consideration when evaluating the net effects of development on shoreline ecological function. The conservation and replanting of riparian vegetation is amongst the highest priorities for salmonid conservation in South Prairie Creek.

Vegetation conservation regulations in Chapter 4.5 of the SMP prohibit the removal of significant vegetation in the first 100 feet from the OHWM. Also, consistent with the Town's Critical Areas regulations and Chapter 4.5.1.A of the SMP, "Where new developments and/or uses or redevelopments are proposed, native shoreline vegetation should be conserved to maintain shoreline ecological functions and/or processes. Vegetation conservation and restoration should be used to mitigate the direct, indirect and/or cumulative impacts of shoreline development, wherever feasible." This policy will allow for revegetation along shorelines where vegetation is presently sparse, and could provide for a net gain in vegetative functions along the Town's shorelines.

5.2 Residential Setbacks

Although a sewer moratorium currently exists, new residential development may be anticipated along South Prairie Creek within the next 20 years. Typically, development of vacant lots into residential uses would result in replacement of pervious, vegetated areas with impervious surfaces and a landscape management regime that often includes chemical treatments of lawn and landscaping. These actions can have multiple effects on shoreline ecological functions, including:

- Increase in surface water runoff due to reduced infiltration area and increased impervious surfaces, which can lead to excessive soil erosion and subsequent in-water sediment deposition.
- Reduction in the ability of a site to improve quality of waters through natural vegetation filtration processes.

- Potential contamination of surface water from chemical and nutrient applications.
- Elimination of upland habitat occupied by wildlife that use riparian areas.

Under the Town's existing critical areas regulations, new structures may not be built within 200 feet of the ordinary high water mark of South Prairie Creek. Under the proposed SMP (SMP **Section 3.2.5**), the minimum standard residential shoreline buffer will be 100 feet. While a reduction in the standard buffer will occur through implementation of the new shoreline regulations, the proposed buffer is consistent with existing development along South Prairie Creek. Specifically, the existing average setback of primary structures along the creek is 100.2 feet, while the median setback is 75.5 feet.

In summary, new residences and the subdivision of existing lots into residential parcels are expected in the Town's shoreline jurisdiction over the next 20 years. The protective setbacks and other measures in the SMP, including a requirement for the conservation of shoreline vegetation, will maintain or improve ecological functions of the shoreline over the long term, thereby resulting in no net loss of shoreline ecological function within the environment.

6 NET EFFECT ON ECOLOGICAL FUNCTION

On its own, the proposed SMP, which includes the Shoreline Restoration Plan, is expected to protect and improve shorelines within the Town of South Prairie while accommodating the reasonably foreseeable future shoreline development, resulting in no net loss of shoreline ecological function. Federal, state, and other local regulations, acting in concert with this SMP, will provide further assurances of improved shoreline ecological functions over time.

As discussed above, major elements of the SMP that ensure no net loss of ecological functions fall into generally five categories: 1) environment designations (Chapter 3), 2) general provisions (Chapter 4), 3) shoreline modification provisions (Chapter 5), 4) shoreline use provisions (Chapter 5), and 5) Shoreline Restoration Planning Element (Appendix C).

Environment Designation Provisions: The *Shoreline Analysis Report* provided the information necessary to assess the current condition and the potential for development along the Town's shorelines. Shoreline uses and modifications were then individually determined to be either permitted (as substantial

developments or conditional uses) or prohibited in each of those environment designations. Environment designations and allowable uses and modifications were developed as a means to achieve both Town planning goals and the conservation of shoreline functions.

General provisions: **Chapter 4** contains a number of regulations on a variety of topics that contribute to protection and restoration of ecological functions. In addition to general SMP policies, these provisions address ecological protection and critical area (Section 4.2), mitigation sequencing (Section 4.2.2), flood hazard reduction (Section 4.3), and vegetation conservation (Section 4.5).

Shoreline modification provisions: **Chapter 5** contains a number of regulations on a variety of topics that contribute to protection and restoration of ecological functions, including Section 5.13 (Shoreline Stabilization) and Section 5.12 (Shoreline Habitat and Natural Systems Enhancement). All of these shoreline modification regulations emphasize the use of designs that do not degrade and may enhance shoreline functions.

Shoreline use provisions: Regulations in **Chapter 5** focus on exclusion of uses that are incompatible with the existing land use and ecological conditions, and they emphasize appropriate location and design of the various uses. These regulations also emphasize avoidance and minimization of ecological impacts via appropriate setbacks, protection and enhancement of vegetation, reduction of impervious surfaces, and use of innovative designs such as low impact development (LID) techniques that do not degrade and may even enhance shoreline functions. These factors are balanced with uses that are important to the Town's shoreline use and development. While allowing water-dependent uses and developments to continue along the shoreline, the proposed SMP emphasizes protection and enhancement of shoreline resources such that no net loss of ecological functions will be achieved over time.

Shoreline Restoration Plan: The Town follows a set of restoration goals and policies set forth in the Visions and Goals element of the Shoreline chapter of the Town's Comprehensive Plan.

Both regulatory and non-regulatory approaches to shoreline conservation are supported in the Comprehensive Plan. A number of restoration projects and programs already in place nearby are outlined in the *Shoreline Restoration Plan* (**Appendix C**). Specific opportunities and/or implementation strategies for restoration on both public and private properties inside and outside of shoreline jurisdiction are proposed by various groups; these efforts are summarized in the Restoration Plan and include Pierce County Parks and Recreation, Pierce Conservation District, as well as ongoing Town programs and activities, as well as ongoing Town programs and activities. All of these programs and

organizations share restoration goals of protecting and restoring ecological function and value within the watershed.

Summary: The following are some of the key features identified in the proposed SMP and this evaluation that protect and enhance shoreline ecological functions.

- Minimum shoreline residential setbacks of 100 feet.
- Retention and revegetation along shorelines as part of future development.
- Water quality and quantity standards for construction and post-construction periods.
- Emphasis on achieving no net loss of shoreline ecological functions throughout shoreline jurisdiction, including development of water-dependent uses.

Given the above provisions of the SMP, including the *Shoreline Restoration Plan* and the key features listed above, implementation of the proposed SMP is anticipated to achieve **no net loss of ecological functions in the Town of South Prairie's shorelines.**

7 REFERENCES

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