

**WALLA WALLA COUNTY
GRANT No. G1400495**

NO NET LOSS REPORT

FOR THE WALLA WALLA COUNTY SHORELINE MASTER PROGRAM

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TABLE OF CONTENTS

	Page #
1 Introduction	1
2 Shoreline Jurisdiction.....	1
3 Shoreline Environment Designations.....	3
3.1 Aquatic.....	3
3.2 Natural	4
3.3 Rural Conservancy	4
3.4 Urban Conservancy	4
3.5 Urban Residential.....	4
3.6 Rural Residential.....	5
3.7 High Intensity	5
3.8 Mill Creek Flume	6
4 Goals, Policies, and Regulations	6
4.1 Critical Areas.....	8
4.2 Shoreline Vegetation Conservation.....	8
4.3 Water Quality, Stormwater and Non Point Pollution.....	9
4.4 Shoreline Stabilization.....	9
4.5 Other Shoreline Modifications	10
4.6 Shoreline Use	12
4.7 Shoreline Habitat and Natural Systems Enhancement Projects.....	16
5 Restoration Opportunities	18
6 Cumulative Impacts	18
7 Conclusions Regarding No Net Loss	19
8 References.....	21

NO NET LOSS REPORT

WALLA WALLA COUNTY SHORELINE MASTER PROGRAM

1 INTRODUCTION

The Shoreline Management Act guidelines (Guidelines) require local shoreline master programs (SMPs) to regulate new development to “achieve no net loss of ecological function.” This No Net Loss (NNL) Report provides a summary of how the development of the Walla Walla County SMP and supporting documents, including the Shoreline Analysis Report, Shoreline Restoration Plan, and Cumulative Impacts Analysis (CIA), will ensure that ecological functions will not be degraded or minimized over time as the SMP is implemented. The CIA evaluated the effects of foreseeable development under the proposed SMP and demonstrated that the goals, policies and regulations in the proposed SMP will prevent degradation of ecological functions relative to the existing conditions, as documented in the County’s Shoreline Analysis Report.

Note that the Shoreline Analysis Report and Restoration Plan were developed on a regional basis and included unincorporated Walla Walla County as well as the City of Walla Walla, City of Waitsburg and City of Prescott. Individual SMPs and, correspondingly, CIAs and NNL Reports have been prepared for each jurisdiction. The County SMP this NNL report relates to pertains only to unincorporated Walla Walla County, including the Attalia Industrial Urban Growth Area (UGA) and Burbank UGA along the Columbia River, as well as the City of Prescott, City of Waitsburg and City of Walla Walla UGAs.

2 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. 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).

In Walla Walla County, shoreline jurisdiction includes the waterbodies listed in Table 1, below.

Table 1. List of Shorelines of the State

<i>Rivers and Streams</i>
Snake River ¹
Columbia River ¹
Walla Walla River ¹
Touchet River ¹
Yellowhawk Creek ²
Mill Creek
Bennington Lake

¹ All or portions of these waterbodies also meet criteria for Shorelines of Statewide Significance.

² Only the portion of Yellowhawk Creek from the confluence with the Walla Walla River to Cottonwood Creek qualifies as a Shoreline of the State.

The areas meeting the shoreline jurisdiction criteria include approximately 269 miles of river and lake shoreline and 18 square miles of upland shorelands, which includes floodways, associated floodplains, and wetlands. The Snake, Columbia, Walla Walla Rivers and portions of the Touchet River also qualify for the special status of Shorelines of Statewide Significance due to having a mean annual flow of 200 cfs or greater.

3 SHORELINE ENVIRONMENT DESIGNATIONS

The County's Shoreline Analysis Report (The Watershed Company and BERK 2014) evaluated existing conditions in the County's shorelines. Shorelines were divided into discrete reaches, and environment designations were proposed for each reach based on site-specific conditions and likely changes in land use.

The assignment of shoreline environment designations is an important step in achieving no net loss of ecological function. Appropriate assignment of such designations can help minimize impacts by concentrating development activity in lower functioning areas that are not likely to experience significant function degradation with incremental increases in new development or redevelopment.

The County's current SMP utilizes a system of four environment designations: Rural, Conservancy, Natural and Urban. The SMP Guidelines recommend use of six unique environments: Aquatic, Natural, Urban Conservancy, Rural Conservancy, Shoreline Residential, and High Intensity. Urban Conservancy, Shoreline Residential, and High Intensity are each intended by the Guidelines to be applied only in cities, UGAs, and intensely developed rural areas.

The Draft Walla Walla County SMP generally follows Ecology's recommended environment designations; however, the findings of the Shoreline Analysis Report support the development of several alternative designations to supplement the Guidelines system. Two alternative designations, "Mill Creek Flume" and "Rural Residential" are added. Additionally, a designation that is generally equivalent to the Guidelines Shoreline Residential environment designation is renamed "Urban Residential." The following discussion provides a brief description of each of the environment designations established in the County's proposed SMP.

3.1 Aquatic

The purpose of the Aquatic environment designation is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark (OHWM). Management policies focus on water-dependent uses and ecological restoration, and aim to minimize impacts to the fish and wildlife habitat, views, water quality, natural hydrologic conditions, and surface navigation.

3.2 Natural

The purpose of the Natural environment designation is to protect those publicly owned shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline functions intolerant of human use. Management policies focus on allowing only very low-intensity uses in order to maintain the ecological functions and ecosystem-wide processes. Any use that would substantially degrade the ecological functions or natural character of the shoreline area should not be allowed. Single-family residential development may be allowed as a conditional use within the Natural environment

3.3 Rural Conservancy

The purpose of the Rural Conservancy environment designation is to give priority to agricultural activities, including associated irrigation and support facilities, accommodate low-density residential uses which are compatible with agricultural activities, maintain no net loss of ecological functions, and allow for recreational opportunities. Management policies promote agricultural activities. All activities and uses should be compatible with the rural character, including the overall density pattern.

3.4 Urban Conservancy

The purpose of the Urban Conservancy environment in the unincorporated County is to protect and restore ecological functions of open space, floodplain and other sensitive lands where they exist in urban growth areas, while allowing a variety of compatible uses. Management policies promote uses that focus on recreation. Allowed uses are generally those which preserve the natural character of the area, and promote the preservation of open space, floodplains or sensitive lands. Public access and recreation objectives should be implemented whenever feasible and significant ecological impacts can be mitigated.

3.5 Urban Residential

The purpose of the Urban Residential environment is primarily to accommodate existing development and guide planned urban residential development and accessory structures. An additional purpose is to provide appropriate community or public access and recreational uses and limited commercial uses. It is assigned to areas that include existing residential development or areas planned or platted for residential development within non-industrial UGAs. Management policies focus on ensuring no net loss of shoreline ecological functions, taking into account the environmental limitations and

sensitivity of the shoreline area, the level of infrastructure and services available or planned to be available, and other comprehensive planning policy considerations. Multi-unit residential developments, including subdivision of land into more than four lots, should provide public access and joint use for community recreational facilities. Access, utilities, and public services should be available and adequate or planned for to serve existing needs and/or planned future development. Commercial development should be limited to water-oriented uses, unless separated from the shoreline, and allowed only when the underlying zoning permits such uses.

3.6 Rural Residential

The purpose of the Rural Residential environment is to give priority to rural-scale residential development in those areas of the County which have stretches of predominantly small lot residential uses or are planned or platted for rural small lot residential uses in rural and agricultural areas. This designation is also intended to provide appropriate public access, maintain no net loss of ecological functions, and allow for recreational opportunities. Management policies focus on taking into account the environmental limitations and sensitivity of the shoreline area, the level of infrastructure and services available or planned to be available, and other comprehensive planning policy considerations. Activities and uses should be designed for compatibility with the rural character, including the overall density pattern. Residential developments that entail subdivision of land into more than four lots should provide public access and joint use of community recreational facilities. Commercial development should be limited to water-oriented uses and allowed only when the underlying zoning permits such uses.

3.7 High Intensity

The purpose of the High Intensity environment designation is to provide for high-intensity water-oriented commercial, transportation, and industrial uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded. Management policies give priority to water-dependent, water-related, and water-enjoyment uses in that order of preference. Public benefits such as ecological restoration or public access may be required in association with nonwater-oriented development. Full utilization of existing urban and extensively altered areas should be achieved before further expansion of intensive development is allowed. Where applicable, new development should include environmental cleanup and restoration of the shoreline to comply with relevant State and federal law.

3.8 Mill Creek Flume

The purpose of the Mill Creek Flume environment designation is to accommodate a mix of water-oriented and nonwater-oriented uses in an intensively developed environment adjacent to Mill Creek's flood control works. Management policies recognize that the existing concrete-lined and partially fenced condition precludes accommodation of recreation oriented water-dependent and water-related development. Water-enjoyment uses, primarily visual, and nonwater-oriented uses should be allowed. The flume environment should be managed to maximize flood control for protection of adjacent uses and developments and improve conditions (passage, water quality) for aquatic species using the flood control channel.

4 GOALS, POLICIES, AND REGULATIONS

The proposed SMP includes several goals intended to conserve the ecological function of all jurisdictional shoreline areas. Additionally, the proposed SMP recognizes that all or portions of the Snake, Columbia, Walla Walla and Touchet Rivers are Shorelines of Statewide Significance and must be given additional consideration as a major resource from which all people derive benefit (SMP Subsection 3.2). General goals for the Shorelines of Statewide Significance include:

- Preserve the natural character of the shoreline.
- Result in long-term over short-term benefit.
- Protect the resources and ecology of the shoreline.

The proposed SMP Section 3.0 includes goals for all shorelines specific to each of the individual elements outlined in the Shoreline Management Act (SMA) and SMP Guidelines. Select goals relevant to no net loss of ecological function include:

Shoreline Use and Modifications, Goal 1 - To foster a pattern of land use along the shorelines of Walla Walla County that balances human use with protection of existing character, habitat, and ecological systems.

Shoreline Use and Modifications, Goal 2 - To encourage shoreline development and modifications that are wisely placed, consistent with the physical limitations

of the area, serve the needs and desires of the local citizens, and ensure no net loss of ecological function.

Shoreline Use and Modifications, Goal 3 - To give priority to preferred uses of the shoreline, as well as those uses that contribute to the unique character and economic prosperity of Walla Walla County, where those uses will not cause a net loss of shoreline ecological function.

Economic Development, Goal 8 - To ensure that economic activity along shorelines is encouraged while also developing in a manner that protects the shoreline environment, is compatible with adjacent land uses, and ensures no net loss of shoreline ecological function.

Conservation and Restoration, Goal 13 - To protect and preserve shoreline natural resources, including wetlands, native vegetation, fish and wildlife habitat, and scenic resources, both through responsible management of public land and incentives for private landowners and developers.

Conservation and Restoration, Goal 14 - To encourage restoration of shoreline ecological functions where they have been impaired and to facilitate restoration of shoreline ecological functions and aesthetics to achieve regional goals for water quality and habitat recovery.

The Shoreline Analysis Report evaluated existing conditions, with particular attention to ecological conditions. The overarching purpose of recording baseline conditions is to ensure the adopted regulations, designed to meet the goals above and others contained within the SMP, provide no net loss of shoreline ecological functions. The Shoreline Analysis Report includes recommendations for translating findings into shoreline designations, SMP policies, and restoration strategies. Key recommendations related to no-net-loss goals are presented below with a brief description of how and where those recommendations are addressed in the SMP's policies and regulations. Additional no-net-loss related provisions found in the SMP for each category of activity are also noted.

4.1 Critical Areas

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<ul style="list-style-type: none"> • Modify the County’s critical areas regulations where needed to meet SMA criteria. • Evaluate whether the existing critical area buffer protections are sufficient to protect their functions and values and achieve no net loss. Assess if changes are needed to recognize existing shoreline conditions and to accommodate water-oriented and other preferred uses consistent with no net loss of ecological functions. • Review wetland regulations to ensure consistency with the latest Ecology guidance. 	<ul style="list-style-type: none"> • Appendix A of the SMP contains a revised version of the County’s critical areas regulations. It states that these regulations are applicable only in shoreline jurisdiction, and shall control within shoreline jurisdiction over other County critical area regulations. • The existing critical area stream buffers were evaluated and where deemed insufficient to meet no net loss provisions, an alternative buffer width was proposed for shoreline waterbodies (this occurred only for Yellowhawk Creek). Buffers for shoreline waterbodies (including Bennington Lake) are included in the body of the SMP (Subsection 6.2, Dimensional Development Standards Table). Shoreline buffer regulations (allowed uses etc.) and buffers for non-shoreline waterbodies in shoreline jurisdiction are found in the SMP critical areas regulations (Appendix A, Section 6.0, Fish and Wildlife Habitat Conservation Areas). • Wetland regulations are updated to specify the most current manuals and guidance (Appendix A, Section 3.0).

4.2 Shoreline Vegetation Conservation

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<ul style="list-style-type: none"> • Review the existing protections provided in the critical areas regulations, paying special attention to measures that will promote retention of shoreline vegetation, replacement of invasive vegetation with native vegetation, and development of a well-functioning shoreline which provides both physical and habitat processes. • Consider development of specific buffer and/or setback strategies that meet requirements for environmental protection and recognition of local conditions. These may include variations between environment designations, and/or waterbodies. • Ensure that vegetation provisions allow for appropriate modifications to accommodate preferred uses, particularly important agriculture 	<ul style="list-style-type: none"> • The SMP states in its policies that development proposals must ensure shoreline vegetation, both upland and waterward of the OHWM, is conserved to maintain shoreline ecological functions and processes. Policies encourage management and control of noxious weeds and state that control of such species should be done in a manner that retains onsite native vegetation, provides for erosion control, and protects water quality. • Buffers for shoreline waterbodies are included in the body of the SMP (Section 6.2, Dimensional Development Standards Table) and Appendix A Table 6.5-1. Appendix A: Section 6.5.B.5 describes a unique buffer strategy developed specifically for Yellowhawk Creek

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<p>modifications, water-dependent or –related port developments, other water-oriented uses, and public access and recreation.</p>	<p>to offer flexibility in required buffer widths based on the existing conditions of a particular parcel, while providing a sufficient level of protection from future development.</p> <ul style="list-style-type: none"> • Allowed uses in buffers are found in the SMP critical areas regulations (Appendix A, Section 6.0, Fish and Wildlife Habitat Conservation Areas).

4.3 Water Quality, Stormwater and Non Point Pollution

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<ul style="list-style-type: none"> • Consider incorporating regulations to facilitate maximum implementation of TMDL plans, and controlling introduction of 303(d)-listed pollutants for which TMDLs have not yet been prepared. • Consider adding clarifying statements noting that the policies of the SMPs are also policies of the comprehensive plan and that the policies also apply to activities outside shoreline jurisdiction that affect water quality within shoreline jurisdiction. However, the regulations apply only within shoreline jurisdiction. 	<ul style="list-style-type: none"> • The SMP states that shoreline uses and developments shall maintain and improve the water quality and quantity of the County's shorelines, and preserve surface and groundwater (5.2, Policy-1). • SMP Subsection 1.1 states that consistent with RCW 36.70A.480, the goals and policies of the SMP shall be considered an element of Walla Walla County's comprehensive planning. • The design, construction and operation of shoreline uses and developments shall incorporate measures to protect and maintain surface and groundwater quantity and quality in accordance with all applicable laws, so that there is no net loss of ecological functions (5.2(A)).

4.4 Shoreline Stabilization

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<ul style="list-style-type: none"> • Ensure that proper reference is given to appropriate exemptions found in the WAC related to "normal maintenance and repair." • Ensure "replacement" and "repair" definitions and standards are consistent with WAC 173-26-231(3)(a). Repair activities should be defined to include a replacement threshold so that applicants and staff will know when "replacement" requirements need to be met. • Include policies and regulations which promote "soft" over "hard" 	<ul style="list-style-type: none"> • 6.19(H) states that maintenance and repair of shoreline stabilization structures may be allowed subject to certain listed standards. It states that while maintenance and repair may meet the criteria for exemption from a SSD Permit, such activity is not exempt from the policies and regulations of the SMP. • Replacement of stabilization structures is defined and regulated under 6.19(G). SMP shoreline stabilization regulations require

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<p>shoreline stabilization measures. Incentives should be included in the SMP that would encourage modification of existing armoring, where feasible, to improve habitat while still maintaining any necessary site use and protection.</p> <ul style="list-style-type: none"> • Consider requiring a Conditional Use Permit for any new hard shoreline stabilization, at least in certain environment designations. 	<p>replacement structures to be regulated as a new shoreline stabilization measure, except for the requirement to prepare a geotechnical analysis (6.19(G)(2)). 6.19(H)(1)(b) also states that any additions to or increases in the size of existing shoreline stabilization measures shall be considered new structures.</p> <ul style="list-style-type: none"> • New development must be located and designed to avoid the need for future shoreline stabilization (6.19(A)). • Soft shoreline stabilization methods are shown preference in the SMP policies (6.19 Policy-3) and regulations (6.19(C)). 6.19(D) states all proposals for shoreline stabilization structures, both individually and cumulatively, must not result in a net loss of ecological functions and shall be the minimum size necessary. • New hard stabilization is a conditional use in the Natural environment designation, but is permitted in the other designations (6.1). However, 6.19(F) states that new hard structural shoreline stabilization measures shall not be authorized, except when a report confirms that there is a significant possibility that a primary structure will be damaged within three years as a result of shoreline erosion in the absence of such hard structural shoreline stabilization measures, or where waiting until the need is immediate results in the loss of opportunity to use measures that would avoid impacts on ecological functions.

4.5 Other Shoreline Modifications

<i>Analysis Report Recommendations</i>	<i>SMP Provisions</i>
<p>Piers and Docks</p> <ul style="list-style-type: none"> • There do not appear to be any private residential pier or dock structures in Walla Walla County which are associated with boat moorage. If that is the case, standards for such residential moorage structures may not be needed. • Overwater structures associated with residential uses, which are used for viewing or other recreational access, such as swimming 	<ul style="list-style-type: none"> • Section 6.6, Boating and Moorage Facilities details specific construction, design and location standards for all boating facilities including piers and docks. To prevent damage to shallow-water habitat, piers and/or ramps shall generally extend at least 40 feet perpendicular from the OHWM and the bottom of both the pier or landward edge of the ramp shall be elevated at least 2 feet above the plane of OHWM. Grated decking is required.

Analysis Report Recommendations	SMP Provisions
<p>and fishing, are present along various waterbodies, including upper Mill Creek (e.g. Kooskooskie Commons). Consider providing dimensional requirements, if allowed.</p> <ul style="list-style-type: none"> • For other types of uses, such as commercial, industrial, and public recreational, it may not be appropriate to have defined dimensional requirements but rather standards which emphasize that these uses should rely on mitigation sequencing to develop an appropriate design. • Ensure repair activities are defined to include a replacement threshold so that applicants and staff will know when “replacement” requirements need to be met. 	<ul style="list-style-type: none"> • Piers and ramps shall be the minimum size necessary to achieve their intended purpose.
<p>Fill</p> <ul style="list-style-type: none"> • Encourage restoration fills. • Fills waterward of the OHWM to create developable land should be prohibited. 	<ul style="list-style-type: none"> • Fills are allowed when associated with restoration projects (6.10 Policy-2) and fill regulations show preference to those for the purpose of restoration (6.10(D)).
<p>Breakwaters, Jetties, Groins and Weirs</p> <ul style="list-style-type: none"> • Breakwaters, jetties and groins are not prevalent in Walla Walla County. Consider prohibiting new breakwaters, jetties, and groins, except where they are essential to restoration or maintenance of existing water-dependent uses. • Weirs have been commonly used in many streams and small rivers in the County to control stream flow and improve fish passage. Consider continuing to allow the use of weirs for such purposes. 	<ul style="list-style-type: none"> • New, expanded or replacement breakwaters, weirs and groins are only allowed if it can be demonstrated that they will not result in a net loss of shoreline ecological functions and that they support water-dependent uses, public access, shoreline stabilization, ecological restoration or other specific public purpose (6.7(A)). Jetties are not addressed as they do not occur in Walla Walla County. • The Use and Modification Matrix (6.1) requires a Conditional Use Permit (CUP) for all purposes other than those structures required to protect or restoration ecological functions or to maintain existing water-dependent uses.
<p>Dredging and Dredge Material Disposal</p> <ul style="list-style-type: none"> • Dredging to maintain active navigation channels, moorage facilities, and docking areas, is expected to continue. Consider providing standards as necessary so these activities can continue. • Re-use of dredge material along the Snake River for the purposes of filling interstitial spaces in rip-rapped shorelines should be allowed. 	<ul style="list-style-type: none"> • The SMP states that dredging may only be permitted for specific activities including development of essential public facilities where no feasible alternatives exist, navigation, and maintenance of irrigation waterways for agriculture and restoration (6.9(D)). The Use and Modification Matrix (6.1) requires a CUP for dredging activities other than those for restoration, navigation, water-dependent uses, flood capacity maintenance and public access; or for implementation of a dredging maintenance plan.

Analysis Report Recommendations	SMP Provisions
	<ul style="list-style-type: none"> • Dredging and dredge material disposal must be done in a manner that avoids or minimizes significant ecological impacts. Impacts that cannot be avoided must be mitigated in a manner that assures no net loss of shoreline ecological functions (6.9(C)).

4.6 Shoreline Use

Analysis Report Recommendations	SMP Provisions
<p>Aquaculture</p> <ul style="list-style-type: none"> • Ensure that any salmon recovery-related aquaculture activities are facilitated in the aquatic and appropriate upland environments. 	<ul style="list-style-type: none"> • Aquaculture policies encourage aquaculture that supports the recovery of endangered or threatened fish species and restricts it in areas where it would result in a net loss of ecological functions (6.5, Policy-1). • Commercial aquaculture is prohibited in all but the Rural Conservancy and High Intensity environment designations where it is a conditional use (Table 6-1, Use and Modification Matrix).
<p>Boating Facilities</p> <ul style="list-style-type: none"> • Regulations for the over- and in-water components should be developed to provide applicants with as much predictability as possible, while still allowing for an appropriate amount of flexibility based on site-specific conditions and use-specific needs. • Public access should be included as components of new marinas or expansions, where feasible. 	<ul style="list-style-type: none"> • Section 6.6, Boating and Moorage Facilities details specific location, construction and design standards for all over- and in-water structures and uses that facilitate as their primary purpose the launching or mooring of vessels. • New marinas shall provide physical and/or visual public access for as many water-oriented recreational uses as possible, commensurate with the scale of the proposal (6.6(I)(3)). • To prevent damage to shallow-water habitat, piers and/or ramps shall generally extend at least 40 feet perpendicular from the OHWM and the bottom of both the pier and landward edge of the ramp shall be elevated at least 2 feet above the plane of OHWM. Grated decking is required. • Consistent with requirements for mitigation sequencing, all boating facilities and private moorage structures shall be the minimum size necessary and designed to avoid and then minimize potential adverse impacts. All unavoidable adverse impacts shall be mitigated, and a mitigation plan submitted (6.6(B)(8)).
<p>Commercial Development</p>	<ul style="list-style-type: none"> • Commercial development in shoreline areas shall be designed to

Analysis Report Recommendations	SMP Provisions
<ul style="list-style-type: none"> • There is minimal commercial use in unincorporated Walla Walla County along the shorelines. However, the County should allow existing commercial uses to continue and identify criteria for where future commercial uses may be appropriate by providing clear priority for water-oriented uses. • Consider incentives to attract water-oriented uses in appropriate locations along the shoreline. • Public access should be included as a component of new non-water oriented commercial uses, where feasible. • Ensure water-dependent uses are not restricted by other regulatory setbacks/buffers. 	<p>achieve no net loss of ecological functions (6.8(D)).</p> <ul style="list-style-type: none"> • Water-dependent commercial uses shall be given preference over water-related and water-enjoyment commercial uses. Water-related and water-enjoyment commercial uses may not be approved if they displace existing water-dependent uses (6.8(A)). • New commercial development in the shoreline environment shall provide appropriate public access to the shoreline, per the requirements of Section 4.6 – Public Access (6.8(F)).
<p>Forest Practices</p> <ul style="list-style-type: none"> • Provide general policies and regulations for forest practices according to the SMP Guidelines. As provided for in WAC 173-26-241(3)(e), the master program should rely on the Forest Practices Act for regulation of commercial forestry. There are, however, specific limits on clear cutting provided in RCW 90.58.150 which must be included. Exceptions to this standard should be by conditional use review. • The SMP standards should apply to Class IV General Forest Practices within the County where shorelines are being converted to non-forestry uses. 	<ul style="list-style-type: none"> • Forest practices are prohibited in all environment designations except for Natural, Rural Conservancy and Rural Residential where it is a conditional use (Table 6-1, Use and Modification Matrix). Forest management practices shall comply with the regulations established by the Washington State Forest Practices Act (RCW 76.09). Where proposed forest practices in shoreline jurisdiction would fall under the applicability of the Forest Practices Act, the local jurisdiction shall consult with the Department of Natural Resources regarding permitting (6.11(A)). • Regulations require conversion of forest lands to any other use to result in no net loss of shoreline ecological functions or significant adverse impacts to other shoreline uses, resources and values, such as navigation, recreation and public access (6.11(B)).

Analysis Report Recommendations	SMP Provisions
<p>Industry</p> <ul style="list-style-type: none"> • Support the Port’s efforts to retain existing and attract new water-oriented industrial uses in appropriate locations. • Recognize current industrial uses and consider incentives to attract water-oriented uses in appropriate locations along the shoreline. • Recognize and allow existing and new industrial uses (e.g. grain silos), that serve the County’s agriculture industry, provided they are developed and operated consistent with the Guidelines and other County and State requirements. 	<ul style="list-style-type: none"> • Policies for Ports and Industrial Development (6.15) give preference to water-dependent industrial development over non-water oriented industrial development in the shoreline environment. Cooperative use of existing port facilities is encouraged, including docks and piers to reduce additional disruption to the shoreline. Multiple uses should be implemented through cooperative use of cargo handling, storage, parking and other accessory facilities among private or public entities as feasible in industrial facilities (Policy-2). • Policies also allow future industrial and port facilities that are dependent upon a shoreline location in areas where the shoreline is already characterized by industrial development or planned for such uses (Policy-3). • 6.15(C) states that new industrial development shall be located, designed and constructed in a manner that assures no net loss of shoreline ecological functions and minimizes disruption of other shoreline resources and values.
<p>In-stream Structural Uses</p> <ul style="list-style-type: none"> • Large-scale in-stream structures intended to produce energy and/or moderate flooding are found in Walla Walla County. There are also a number of irrigation diversion and discharge structures in many waterbodies. Regulations need to accommodate anticipated new diversion structures, and repair/maintenance and possible expansion of existing projects. 	<ul style="list-style-type: none"> • In-stream structure policies ensure the location, design, construction and maintenance of in-stream structures give due consideration to the full range of public interests, watershed functions and processes, and environmental concerns, with special emphasis on protecting and restoring priority habitats and species and encourage non-structural and non-regulatory approaches as an alternative to in-stream structures (6.13, Policies 1 and 2). • New in-stream structures shall provide for the protection and preservation of ecosystem-wide processes, ecological functions, and cultural resources, including, but not limited to, fish and fish passage, priority habitats and species, other wildlife and water resources, shoreline critical areas, hydrogeological processes, and natural scenic vistas (6.13(A)).
<p>Mining</p> <ul style="list-style-type: none"> • Very little mining actively occurs within Walla Walla County. Consider policies which emphasize locating new mining away from shorelines, floodplains, and streams. 	<ul style="list-style-type: none"> • Mining is prohibited in all environment designations except High Intensity, where is requires a Conditional Use Permit. • Mining shall not be permitted in designated fish and wildlife habitat areas except as a part of an approved flood control program or in conjunction with a habitat restoration or enhancement plan, provided

Analysis Report Recommendations	SMP Provisions
	<p>that such mining activities are demonstrated to be water-dependent (6.14(B)).</p> <ul style="list-style-type: none"> • Mining of active channel or channels of a river shall not be permitted (6.14(C)).
<p>Recreational Development</p> <ul style="list-style-type: none"> • Recognizing that Walla Walla County has not historically served as a provider of parks and open space, include appropriate provisions for existing and potential recreational uses, including boating, swimming, and fishing. • Work with local, State and federal parks departments; Army Corps of Engineers; and Port officials to ensure consistency between shoreline policies and regulations and long-term parks management plans. • Policies and regulations related to parks management should provide clear preferences for shoreline restoration consistent with public access needs and uses. • New shoreline access should be located and designed to maintain ecological functions. 	<ul style="list-style-type: none"> • Recreational development is a priority use of the shoreline. Preference shall be given to water-dependent uses such as fishing, swimming, and boating (6.16(A)). • Recreation facilities shall be designed and located to take maximum advantage of and enhance the natural character of the shoreline area, and ensure no net loss of shoreline ecological functions (6.16(C)). • Policies encourage recreational uses and development that provide for the preservation and enhancement of scenic views and vistas (Policy-3). • Recreational development in shoreline jurisdiction shall include shoreline access features to allow users to use and enjoy the shoreline. Such features may include, but are not limited to walking paths and bicycle trails (6.16(E)).
<p>Residential Development</p> <ul style="list-style-type: none"> • Residential uses in the unincorporated County are generally not concentrated in shoreline areas. Where proposed, residential development should proceed in a manner consistent with the control of pollution and prevention of damage to the shoreline environment. • Incorporate clear dimensional criteria for residential development, including setbacks/buffers, lot coverage, height limits, etc. • Include provisions which ensure that new development, including the creation of new lots, would not require new shoreline stabilization. New primary and accessory residential structures should be located far enough from the shoreline to prevent such a need. • For residential subdivisions that create five or more lots, consider how to create public or community access opportunities to the shoreline, as stipulated by the WAC Guidelines. 	<ul style="list-style-type: none"> • Residential development shall be designed and configured in a manner that does not result in a net loss of shoreline ecological function. It shall be designed consistent with the applicable environment designation, as well as zoning and development regulations (6.17(A) and (D)). • Design residential development in shoreline jurisdiction to be compatible with environmental conditions. • Dimensional criteria are provided in Table 6-2, Walla Walla County Dimensional Development Standards. • Residential development shall be designed and located in a manner that does not require the construction of new shoreline stabilization features or flood control measures to protect the proposed residences, for the life of the structure (6.17(B)). • New residential development which includes subdivision of land for more than four parcels, shall provide shared community access to

Analysis Report Recommendations	SMP Provisions
<p>Transportation and Parking</p> <ul style="list-style-type: none"> Given the prevalence of transportation infrastructure within or near shorelines, allow for maintenance and improvements to existing roads, railroads and parking areas, and for necessary new roads and parking areas where other locations outside of shoreline jurisdiction are not feasible. 	<p>the shoreline for residents (6.17(F)).</p> <ul style="list-style-type: none"> Maintenance and improvements are allowed. When it is necessary to locate transportation infrastructure within shoreline jurisdiction, such facilities should be designed to minimize the amount of land area consumed and located as far landward from the shoreline as possible (6.21(A)). Transportation and parking development shall be carried out in a manner that maintains or improves State water quality standards for affected waters and results in no net loss of shoreline ecological function (6.21(C)). Stand-alone parking lots and parking garages shall be located on portions of the development site outside shoreline jurisdiction to the greatest degree feasible and shall be separated from the shoreline by vegetation, undeveloped space, a topographical barrier, or another building or structure (6.21(F)).
<p>Utilities</p> <ul style="list-style-type: none"> Allow for maintenance and improvements to existing utility facilities. Ensure that location of new utilities considers alternatives to location within shoreline jurisdiction and provide performance standards for necessary new utilities where other locations outside of shoreline jurisdiction are not feasible. 	<ul style="list-style-type: none"> Policies ensure new utilities utilize existing transportation and utility rights-of-way easements, or existing cleared areas to the greatest extent feasible and state that projects should locate new utilities outside shoreline jurisdiction unless alternative locations are unfeasible, the utility requires a shoreline location, or the utility is necessary to support an approved shoreline use (6.22, Policies 1 and 2). Utilities applications should demonstrate how the location, design and use achieves no net loss of shoreline ecological functions and incorporates appropriate mitigation (6.22(F)).

4.7 Shoreline Habitat and Natural Systems Enhancement Projects

Analysis Report Recommendations	SMP provisions
<ul style="list-style-type: none"> Consider incentives to encourage restoration projects, particularly in areas identified as having lower function. Emphasize that certain fills, such as streambed gravels or material 	<ul style="list-style-type: none"> Restoration is permitted in all environment designations and is generally incentivized through an easier permit pathway (SDP or exemption, versus CUP).

to anchor logs, can be an important component of some restoration projects.

- Restoration related fills are addressed in 6.10, Fill. Fills are encouraged when associated with restoration projects (9.10 Policy-2) and restoration fills are not subject to the same requirements as other fill (9.10(D)).

5 RESTORATION OPPORTUNITIES

The County's Shoreline Restoration Plan (TWC 2015), prepared as part of the regional SMP update, will serve as a framework for the County and its restoration partners to identify and implement opportunities to improve impaired ecological functions in the County's shorelines. Several restoration opportunities were identified to address ecological impairments identified in the Shoreline Analysis Report. Restoration recommendations focus on implementation of best management practices; project design to improve stream flow, fish passage and floodplain connectivity; coordination with landowners to implement voluntary riparian and floodplain enhancement projects through acquisition, easement, or conservation agreements; improvement of floodplain connectivity, fish passage and habitat restoration on the Columbia River through restoration of off-channel habitats and instream complexity and enhancement of connectivity to small tributaries; and ongoing management and mitigation measures to minimize impacts of ongoing Columbia River dam operations.

The Shoreline Restoration Plan identified several funding sources and partners with whom the County may partner to achieve its shoreline restoration goals.

6 CUMULATIVE IMPACTS

The Cumulative Impacts Analysis determined that the proposed SMP is expected to maintain existing shoreline functions within Walla Walla County while accommodating the reasonably foreseeable future shoreline development.

The following are some of the key features identified in the Cumulative Impacts Analysis that protect and enhance shoreline ecological functions to ensure that the no net loss standard is met.

- Shoreline environment designations are based on existing shoreline conditions. Allowed uses focus higher-intensity development in areas with a higher level of existing alterations, while limiting future uses in areas where ecological functions and processes are more intact.
- SMP standards require applicants to avoid, minimize, and then compensate for unavoidable impacts to shoreline functions. Where SMP standards do not

provide specific, objective measures that clarify avoidance, minimization, and mitigation measures, a mitigation sequencing analysis is required.

- Shoreline critical areas regulations are consistent with recommended State guidance to maintain ecological functions.
- Specific policies and regulations governing shoreline uses and modifications ensure that potential impacts are regulated to avoid a net loss of ecological function, while also meeting the requirements of the Shoreline Management Act pertaining to public access, prioritization of shoreline uses, and private property rights.
- The SMP includes an emphasis on achieving no net loss of shoreline ecological functions throughout shoreline jurisdiction.

7 CONCLUSIONS REGARDING NO NET LOSS

The SMP update process has provided the opportunity to identify existing environmental conditions, anticipate future impacts to shoreline functions, and promote restoration opportunities within Walla Walla County's shoreline jurisdiction. The SMP update was based on the evaluation of existing conditions identified through the Shoreline Analysis Report. The proposed SMP provides a high level of protection to shoreline ecological functions. Major elements of the SMP that ensure no net loss of ecological functions fall into four general categories: 1) environment designations (SMP Section 4.0), 2) general policies and regulations (SMP Section 5.0), 3) critical areas regulations (SMP Appendix A), and 4) shoreline use and modification specific provisions (SMP Section 6.0). In addition to the mandatory components of the SMP, the Shoreline Restoration Plan identifies voluntary restoration opportunities that will help the County identify and prioritize opportunities to restore shoreline ecological functions.

The Shoreline Analysis Report provided the information necessary to assign environment designations to the County's shoreline. 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.

Regulations emphasize avoidance and minimization of ecological impacts primarily via protection of vegetation. These factors are balanced with uses and modifications that

are essential to maintaining the existing water-dependent use and necessary modifications. Recommendations from the Shoreline Analysis Report were weighed and generally followed in the development of the SMP. Deviations from the Shoreline Analysis Report recommendations were made to ensure that 1) regulations did not interfere with the potential for shoreline restoration or enhancement, or prevent future public access/recreation improvements; and 2) existing uses were allowed to continue to operate. All of the shoreline modification regulations emphasize minimization of size of structures and use of appropriate materials, and use of designs that do not degrade and may even enhance shoreline functions. The proposed SMP emphasizes protection and enhancement of shoreline resources such that no net loss of ecological functions will be achieved over time.

Several potential voluntary restoration projects, programs, and partners were identified in the Shoreline Restoration Plan. Specific opportunities and/or implementation strategies for restoration both within and outside of shoreline jurisdiction were proposed.

Given the above provisions, implementation of the proposed SMP is anticipated to achieve **no net loss of ecological functions in Walla Walla County's shorelines.**

8 REFERENCES

Walla Walla County. November 2015. Walla Walla County Shoreline Master Program Draft, Revised per preliminary Ecology review.

The Watershed Company and BERK. November 2015. Cumulative Impacts Analysis for Walla Walla County's Shoreline Master Program. Prepared for Walla Walla County.

The Watershed Company. June 2015. Shoreline Restoration Plan for Shorelines in Walla Walla County and the Cities of Walla Walla, Prescott, and Waitsburg. Prepared for Walla Walla County, Walla Walla, WA.

The Watershed Company, BERK, and the Walla Walla Basin Watershed Council. September 2014. Shoreline Analysis Report for Shorelines in Walla Walla County and the Cities of Walla Walla, Prescott and Waitsburg. Prepared for Walla Walla County, Walla Walla, WA.