WALLA WALLA COUNTY
GRANT NO. G1400495

NO NET LOSS REPORT

FOR THE CITY OF WALLA WALLA SHORELINE MASTER PROGRAM

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NO NET LOSS REPORT

CITY OF WALLA WALLA 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 City of Walla Walla 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 Shoreline Analysis Report.

Note that the Shoreline Analysis Report and Restoration Plan were developed on a regional basis and included both 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 City of Walla Walla SMP this NNL report relates to pertains only to incorporated areas of the City of Walla Walla. The City of Walla Walla Urban Growth Area (UGA) is addressed in the County documents.

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 the City of Walla Walla the only waterbody meeting the definition of a shoreline of the state is Mill Creek. The areas meeting the shoreline jurisdiction criteria include approximately 10 miles of river shoreline and .46 square miles of upland shorelands, which includes floodways, associated floodplains, and wetlands.

3 SHORELINE ENVIRONMENT DESIGNATIONS

The Shoreline Analysis Report (The Watershed Company and BERK 2014) evaluated existing conditions in the City'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 City's current SMP utilizes a system of four environment designations: Rural, Conservancy, Natural and Urban. The SMP Guidelines recommend the use of five potential environment designations for incorporated areas: Aquatic, Natural, Urban Conservancy, Shoreline Residential, and High Intensity.

The Draft 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 "Urban Downtown" are added. Additionally, a

designation that is generally equivalent to the Guidelines Shoreline Residential environment designation is renamed "Urban Residential". The Natural environment designation is not applicable to shorelines in the city and is omitted. Finally, the Aquatic environment designation is also omitted as all shorelines waterward of the OHWM are contained within the Mill Creek Flume environment designation. The following discussion provides a brief description of each of the environment designations established in the City's proposed SMP.

3.1 Urban Conservancy

The purpose of the Urban Conservancy environment 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.

3.2 Urban Residential

The purpose of the Urban Residential environment is to primarily 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.

3.3 High Intensity

The purpose of the High Intensity environment designation is to provide for a variety of different uses including, high-intensity commercial, transportation, industrial, and

residential uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded. Management policies give priority to water-enjoyment uses and promote full utilization of existing urban and extensively altered areas before further expansion of intensive development is allowed. Where feasible public access should be required as well as environmental cleanup and restoration of the shoreline to comply with relevant state and federal law.

3.4 Urban Downtown

The purpose of the Urban Downtown environment designation is to provide for a variety of urban uses in areas where Mill Creek flows partially or fully confined in artificial, underground channels. Management policies acknowledge that because this environment designation is characterized by an artificial stream channel and is physically separated from upland development by virtue of being located underground, areas within the Urban Downtown environment designation should not be subject to the shoreline use preferences established in RCW 90.58.020, nor the use priorities established in WAC 173-26-201(2)(d). Likewise, the General Policies and Regulations contained in Chapter 5 of the SMP do not apply within the Urban Downtown environment designation. Furthermore, building heights within the Urban Downtown environment designation should not be limited by the development standards of this SMP, but should comply with applicable city zoning regulations.

3.5 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. 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 the City of Walla Walla 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 the City of Walla Walla, 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

Analysis Report Recommendations	*SMP Provisions*
• Modify the City'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.	• Appendix A of the SMP contains a revised version of the City's critical areas regulations. It states that these regulations are applicable only in shoreline jurisdiction, and shall control within shoreline jurisdiction over other City critical area regulations. • The existing critical area stream buffers were evaluated and deemed sufficient to meet no net loss provisions. Buffers for shoreline waterbodies 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

Analysis Report Recommendations	*SMP Provisions*
• 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 modifications, water-dependent or –related port developments, other water-oriented uses, and public access and recreation.	• 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 (Subsection 6.2, Dimensional Development Standards Table. • 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

Analysis Report Recommendations	*SMP Provisions*
• 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.	• The SMP states that shoreline uses and developments shall maintain and improve the water quality and quantity of the City'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 the City of Walla Walla'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

Analysis Report Recommendations	*SMP Provisions*
• 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" 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. • Consider requiring a Conditional Use Permit for any new hard shoreline stabilization, at least in certain environment designations.	• 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 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. • 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)

Analysis Report Recommendations	*SMP Provisions*
	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

Analysis Report Recommendations	*SMP Provisions*
Piers and Docks • There do not appear to be any private residential pier or dock structures which are associated with boat moorage. If that is the case, standards for such residential moorage structures may not be needed. • Consider providing dimensional requirements for overwater structures associated with residential uses, if appropriate. • 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.	• Boating facilities are not an appropriate or feasible use in the City of Walla Walla’s shoreline jurisdiction. All boating and moorage facilities, including piers and docks are prohibited (Table 6-1, Use and Modification Table).

Analysis Report Recommendations	***SMP Provisions***
Fill • Encourage restoration fills. • Fills waterward of the OHWM to create developable land should be prohibited.	• 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)).
Breakwaters, Jetties, Groins and Weirs • Breakwaters, jetties and groins are not prevalent in the City. Consider prohibiting new breakwaters, jetties, and groins, except where they are essential to restoration or maintenance of existing water-dependent uses.	• 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 the City of Walla Walla. • 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 in the Urban Downton and Mill Creek Flume environment designations.
Dredging and Dredge Material Disposal • Except for purposes of shoreline restoration, flood hazard reduction, and maintenance of existing legal moorage and navigation, consider prohibiting these modifications.	• 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. • 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***
Aquaculture • Ensure that any salmon recovery-related aquaculture activities are facilitated in the aquatic and appropriate upland environments.	• 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 (Table 6-1, Use and Modification Matrix).
Boating Facilities • 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.	• Boating facilities are not an appropriate or feasible use in the City of Walla Walla's shoreline jurisdiction. New or expanded boating and moorage facilities are prohibited (6.6, Boating and Moorage Facilities).
Commercial Development • Support the efforts by the City to provide for commercial development along Mill Creek. • 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.	• Policies recognize the urban character of Mill Creek within the City of Walla Walla and encourage water-enjoyment commercial development that promotes economic activity and public enjoyment of the shoreline (6.8, Policy 1). • Commercial development in shoreline areas shall be designed to achieve no net loss of ecological functions (6.8(D)). • Water-enjoyment uses shall be given preference over nonwater-oriented commercial uses along Mill Creek. Non-water oriented commercial uses may be permitted if included in a mixed-use project that includes a water-oriented uses or if public access to the shoreline is incorporated into the project design (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)).

Analysis Report Recommendations	***SMP Provisions***
Forest Practices • 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 City where shorelines are being converted to non-forestry uses.	• Forest practices are not an appropriate use in the City's shorelines and are prohibited in all environment designations (6.11).
Industry • Recognize current industrial uses and consider incentives to attract water-oriented uses in appropriate locations along the shoreline.	• Policies recognize the urban character of Mill Creek within the City of Walla Walla and give preference to industrial development which encourages cooperative use of existing facilities that promotes economic activity and public enjoyment of the shoreline (6.15, 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.

Analysis Report Recommendations	***SMP Provisions***
In-stream Structural Uses • Regulations need to accommodate anticipated new diversion structures, and repair/maintenance and possible expansion of existing projects.	• 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)).
Mining • Very little mining actively occurs. Consider policies which emphasize locating new mining away from shorelines, floodplains, and streams.	• All mining activities are prohibited (6.14).
Recreational Development • Include appropriate provisions for existing and potential recreational uses. • Work with local, state and federal parks departments and the Army Corps of Engineers 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.	• Water-oriented recreational development shall be a priority in the shoreline jurisdiction. Where water-dependent uses, such as swimming, fishing, and boating are not appropriate or feasible due to shoreline conditions, water-enjoyment uses, such as trails and passive parks shall be given priority (6.16(A)). • Expansions and improvements at existing shoreline parks to add or improve shoreline public access features shall be prioritized, provided that such improvements would not interfere with shoreline use or enjoyment by adjacent property owners or result in a net loss of shoreline ecological function (6.16(B)). • New recreation facility development along the Mill Creek Recreation Trail shall include an on-site connection to the trail network (6.16(C)).

Analysis Report Recommendations	***SMP Provisions***
Residential Development • Recognize current and planned shoreline residential uses with adequate provision of services and utilities as appropriate to allow for shoreline ecological protection. • 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.	• Single-family and multifamily residential development in shoreline jurisdiction shall be designed and located to minimize the need for new structural stabilization, minimize native vegetation removal, and shall result in no net loss of shoreline ecological function (6.17(A)). • Dimensional criteria are provided in Table 6-2, Dimensional Development Standards. • New residential development in shoreline jurisdiction, which includes subdivision of land for more than four parcels, shall provide community access to the shoreline, consistent with the standards of Section 5.1.6: Public Access (6.17(B)).
Transportation and Parking • 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.	• 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)).
Utilities • 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	• 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

Analysis Report Recommendations	*SMP Provisions*
jurisdiction are not feasible.	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*
• Consider incentives to encourage restoration projects, particularly in areas identified as having lower function. • Emphasize that certain fills, such as streambed gravels or material to anchor logs, can be an important component of some restoration projects.	• Restoration is permitted in all environment designations and is generally incentivized through an easier permit pathway (SDP or exemption, versus CUP). • 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 Shoreline Restoration Plan (TWC 2015), prepared as part of the regional SMP update, will serve as a framework for the City and its restoration partners to identify and implement opportunities to improve impaired ecological functions in the City's shorelines. Several restoration opportunities were identified to address ecological impairments identified in the Shoreline Analysis Report. Restoration recommendations which may be relevant in the City focus on implementation of best management practices and project design to improve stream flow and fish passage.

The Shoreline Restoration Plan identified several funding sources and partners with whom the City 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 the City of Walla Walla 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 the City of Walla Walla'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 City identify and prioritize opportunities to restore shoreline ecological functions.

The Shoreline Analysis Report provided the information necessary to assign environment designations to the City'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 the City of Walla Walla's shorelines**.

8 REFERENCES

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