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TASK 9, DELIVERABLE 2

NO NET LOSS REPORT

City of Goldendale Shoreline Master Program

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NO NET LOSS REPORT

CITY OF GOLDENDALE SHORELINE MASTER PROGRAM

1 INTRODUCTION

The Shoreline Master Program Guidelines (Guidelines) require each local Shoreline Master Program (SMP) to regulate new development to achieve “no net loss” of ecological function (WAC 173-26-186[8][b]). This No Net Loss Report provides a summary of how the development of the City of Goldendale (City) SMP (dated February 29, 2016) and supporting documents, including the Shoreline Analysis Report, Shoreline Restoration Plan, and Cumulative Impacts Analysis, ensure that ecological functions will not be diminished over time as the SMP is implemented. This No Net Loss Report is a required element of the SMP update process.

2 SHORELINE ENVIRONMENT DESIGNATIONS

The Little Klickitat River is the only waterbody in the City that qualifies as a Shoreline of the State. Shoreline jurisdiction within City limits covers approximately 7,263 linear feet of shoreline and encompasses approximately 115 acres.

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

The Shoreline Analysis Report evaluated existing conditions in the City’s shorelines and informed the development of environment designations. The inventory of shoreline conditions and evaluation of ecological functions was completed using three distinct reaches. These three reaches are shown below in Figure 3-1.

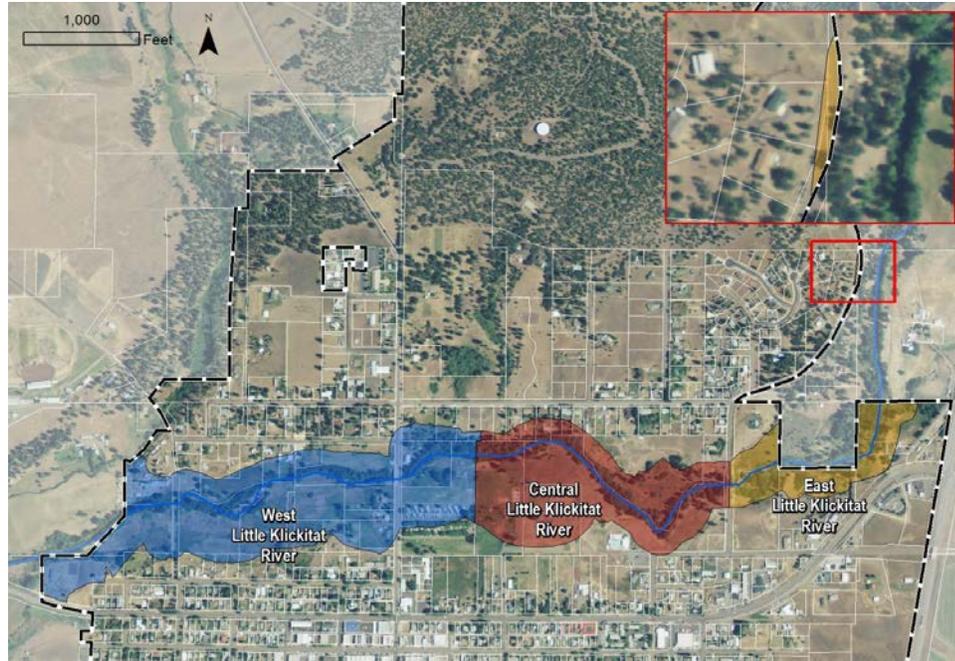


Figure 1. Reaches in the Shoreline Analysis Report.

The assignment of environment designations was based on the existing use pattern, the biological and physical character of the shoreline, and the goals and aspirations of the community. The SMP features three upland environment designations: High-Intensity, Parks and Recreation, and Shoreline Residential. The extents of these designations are shown below in Figure 3-2. All areas waterward of the ordinary high water mark are designated Aquatic. Areas outside of current City limits, within its designated urban growth area, Little Klickitat River shorelines have been pre-designated in preparation for eventual annexation.

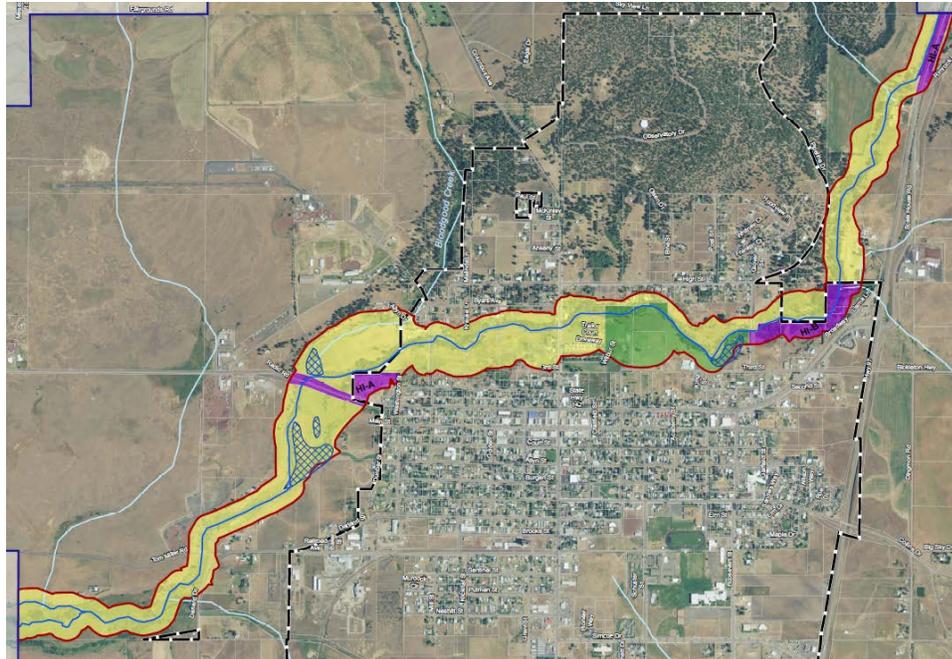


Figure 2. SMP upland environment designations (purple is High-Intensity; green is Parks and Recreation; yellow is Shoreline Residential).

The High-Intensity designation is intended 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. The Parks and Recreation designation is intended to protect and restore ecological functions of open space, floodplain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses. Finally, the Shoreline Residential designation is intended to accommodate residential development and appurtenant structures.

3 POLICIES & REGULATIONS

The Shoreline Analysis Report evaluated existing conditions, with particular attention to ecological conditions, in the City's shorelines. The overarching purpose of recording baseline conditions is to ensure that the adopted regulations achieve no net loss of shoreline ecological function. The report includes recommendations for translating findings into various SMP elements, including SMP policies and regulations. Key recommendations for SMP policies and regulations related to no net loss goals are presented in Tables 1 through 3, with a brief description of how those recommendations are addressed in the SMP.

Table 1. Implementation of key Shoreline Analysis Report general provision recommendations related to no net loss.

General Provision	Report Recommendation Summary	Recommendation Implementation
Critical Areas	Incorporate the City's critical areas ordinance into the SMP either by direct inclusion as an appendix, or by reference.	Updated shoreline critical areas regulations are incorporated into the SMP as Appendix B.
Flood Hazard Reduction	The SMP should provide flexibility for developing and maintaining flood hazard reduction measures as needed to continue protection of existing uses. Emphasis should be given to maintaining existing ecological functions, at a minimum, through Ecology's no net loss criteria.	SMP section 6.4 addresses flood hazard reduction measures, and outlines allowed development in floodplains and includes guidelines on specific activities and structure development. Maintaining existing ecological functions is emphasized in SMP regulation 6.4(5)B in regards to new structural flood hazard reduction measures.

Table 2. Implementation of key Shoreline Analysis Report shoreline modification provision recommendations related to no net loss.

Modification Provision	Report Recommendation Summary	Recommendation Implementation
Shoreline Stabilization	Consider requiring a shoreline conditional use permit for any new hard shoreline stabilization.	A shoreline conditional use permit is required for any new hard shoreline stabilization in all shoreline environments (SMP Table 7-1).
Piers & Docks	Based on the contents of this report and local conditions, consider prohibiting piers and docks.	Boating facilities, including, but not limited to, piers and docks, shall be prohibited within the City's shoreline jurisdiction (SMP regulation 7.4[1]).
Breakwaters, Jetties, Groins & Weirs	Based on the contents of this report and local conditions, consider prohibiting new breakwaters, groins, and jetties. Address weirs as an in-stream structural use.	Breakwaters, jetties, and groins are not specifically addressed in the SMP as they are not anticipated to be applicable in Goldendale, and would therefore be reviewed through the shoreline conditional use permit process if proposed (SMP regulation 7.1[3]). Weirs would be regulated as an in-stream structure.
Dredging & Dredge Material Disposal	Except for purposes of shoreline restoration or flood hazard reduction, consider prohibiting dredging activities.	Dredging may be allowed for the following purposes when significant ecological impacts are minimized and mitigation is provided: A. Development, expansion and maintenance of essential public

Modification Provision	Report Recommendation Summary	Recommendation Implementation
		facilities when there are no feasible alternatives. B. Reduction of flood hazards when consistent with an approved flood hazard management plan. C. Restoration or enhancement of shoreline ecological functions and processes benefiting water quality and/or fish and wildlife habitat. (SMP regulation 7.6[3]).

Table 3. Implementation of key Shoreline Analysis Report shoreline use provision recommendations related to no net loss.

Use Provision	Report Recommendation Summary	Recommendation Implementation
Agriculture	Maintenance of existing agriculture is commercially and culturally important to the City and surrounding area. This should be recognized in SMP policies.	SMP regulation 7.2(1) states that "The City's Shoreline Master Program does not require modification of or limit agricultural activities occurring on agricultural lands."
Aquaculture	Based on the contents of this report and local conditions, consider requiring a conditional use permit for aquaculture.	Aquaculture is allowed through the conditional use process in the Aquatic environment and prohibited in upland environments (SMP Table 7-1). Aquaculture provisions closely follow SMP Handbook Aquaculture Interim Guidance Appendix B: Example language for cities.
Boating Facilities	Based on the contents of this report and local conditions, consider prohibiting boating facilities in shoreline jurisdiction.	Boating facilities, including, but not limited to, piers and docks, shall be prohibited within the City's shoreline jurisdiction (SMP regulation 7.4[1]).
Commercial Development	The City should allow existing commercial uses to continue and include development standards for future commercial development.	Commercial development standards for future development are outlined in SMP section 7.5. Existing commercial uses may continue as SMP applies only to proposed uses and development, not existing development (SMP regulation 1.3[2]).
Forest Practices	Per the Guidelines, the City's SMP should rely on the Forest Practices Act and its implementing rules, as well as the Forest and Fish Report. for adequate management of	New forest practices are prohibited within shoreline jurisdiction (SMP regulation 7.8[1]).

Use Provision	Report Recommendation Summary	Recommendation Implementation
	commercial forest uses within shoreline jurisdiction. However, the City's SMP will apply to Class IV-General forest practices where shorelines are being converted or are expected to be converted to non-forest uses.	
Industry	The City should allow existing industrial uses to continue and include development standards for future industrial development.	Industrial development standards for future development are outlined in SMP section 7.9. Existing industrial uses may continue as SMP applies only to proposed uses and development, not existing development (SMP regulation 1.3[2]).
Mining	Develop regulations that will allow maintaining or expanding the existing mining operation (Reach 3). Consider requiring a shoreline conditional use permit for new mining uses waterward of the OHWM.	New mining is prohibited within shoreline jurisdiction (SMP regulation 7.11[1]). Normal maintenance and repair are exempt (WAC 173-27-040[2][b]).
Recreational Development	Ensure that the SMP includes standards to address potential trail development in shoreline jurisdiction.	SMP regulation 6.5(11) addresses location and design criteria for public access, including potential public pedestrian access walkways. SMP Appendix B regulation 3.3(2)B.3 addresses water-oriented public access and recreation structures in shoreline buffers. SMP Appendix B regulation 3.3(2)B.5 addresses private pathways.
Residential Development	Incorporate clear dimensional criteria for residential development, such as setbacks/buffers.	Shoreline buffers and setbacks are specified in SMP Appendix B Table B3-1. SMP regulation 7.1(4) typically limits structure heights in shoreline jurisdiction to 35 feet.
Transportation & Parking	Allow for maintenance and improvements to existing roads and parking areas, and for necessary new roads and parking areas where other locations outside of shoreline jurisdiction are not feasible.	Improvements to existing transportation and parking facilities are allowed if consistent with SMP section 7.16. Normal maintenance and repair are exempt (WAC 173-27-040[2][b]).
Utilities	Allow for maintenance and improvements to existing utility facilities.	Improvements to existing utility facilities are allowed if consistent with SMP section 7.17. Normal maintenance and repair are exempt (WAC 173-27-040[2][b]).

4 RESTORATION OPPORTUNITIES

As part of a comprehensive SMP update, as elaborated on in the SMP Guidelines, local jurisdictions are required to plan for the restoration of impaired shoreline functions. Such planning “should be designed to achieve overall improvements in shoreline ecological function over time, when compared to the status upon adoption of the master program” (WAC 173-26-201[2][f]). The purpose of the Shoreline Restoration Plan is to plan for the restoration of impaired shorelines for the City.

Importantly, the Shoreline Restoration Plan is a non-regulatory component of the City’s SMP update. The Shoreline Restoration Plan represents a vision for voluntary restoration to be implemented over time and result in ongoing improvements to shoreline ecological functions within Goldendale.

The goal of the Shoreline Restoration Plan is to achieve overall improvements in shoreline ecological function over time, when compared to existing conditions. The Shoreline Restoration Plan includes the following objectives that provide more detail of how the City and potential restoration partners might work to achieve a net improvement in shoreline ecological functions:

- *Objective 1* – Protect natural shoreline ecological processes and functions, and restore those processes and functions that have been altered.
- *Objective 2* – Maintain biodiversity and conserve unique, fragile, and valuable species and habitats.

The Shoreline Restoration Plan lists key issues and actions applicable to the Little Klickitat subbasin. The plan provides an implementation framework by identifying several potential restoration partners, funding mechanisms, outreach and education measures, tracking mechanisms, and other issues for consideration.

5 CUMULATIVE IMPACTS

The Cumulative Impacts Analysis evaluated whether the City’s SMP would address adverse environmental impacts such that no net loss of ecological functions would result over a 20-year planning horizon. The Cumulative Impacts Analysis stated that future development in shoreline jurisdiction is likely to be limited due to the extensive presence of floodway and floodplain, though certain types of development are likely to occur.

The Cumulative Impacts Analysis determined that implementation of the SMP is anticipated to achieve no net loss of ecological functions. Following are components of the SMP that the Cumulative Impacts Analysis identified as integral to ensuring that the no net loss standard is met:

- *Environment designations:* Shoreline environment designations are based on existing shoreline conditions. Allowed uses focus high-intensity development in areas with a high level of existing alterations, while limiting future uses in areas where ecological functions and processes are more intact.
- *Shoreline critical areas regulations:* Shoreline critical regulations are intended to protect shoreline critical areas in accordance with most current, accurate, and complete scientific and technical information available. Regulations include buffers for Shorelines of the State.
- *Mitigation sequencing:* 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 use and modification regulations:* Specific regulations for shoreline uses and modifications ensure that potential impacts are regulated to avoid a net loss of ecological function.

The Cumulative Impacts Analysis also noted that other local, state and federal regulations, acting in concert with the SMP, will provide further assurances of maintaining shoreline ecological functions. Additionally, voluntary restoration actions in the Shoreline Restoration Plan provide the opportunity for the City's shorelines to be enhanced and restored over time.

6 CONCLUSIONS REGARDING NO NET LOSS

The Goldendale SMP update process has provided the opportunity to identify existing environmental conditions, anticipate potential future impacts to shoreline functions, and identify restoration opportunities. The Shoreline Analysis Report enabled the SMP update process to rely on current, comprehensive information on the shoreline environment. The Cumulative Impacts Analysis evaluated the effects of reasonably foreseeable development that may occur under the SMP. The Shoreline Restoration Plan identified opportunities to improve impaired ecological functions in the City's

shorelines. These elements facilitated the development of an SMP that directly and fully considers the preservation of ecological functions in order to achieve no net loss.

Major elements of the SMP update that ensure no net loss of ecological functions include: 1) shoreline environment designations; 2) general provisions; 3) shoreline use and modification provisions; and 4) the Shoreline Restoration Plan. The first three elements were developed with the goal of achieving no net loss of function and subject to an analysis of potential ecological impacts. The fourth element was developed with the aim of improving shoreline function where the opportunity exists.

Given the above, implementation of the City of Goldendale's SMP is anticipated to achieve no net loss of shoreline ecological functions.