City of Buckley
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No Net Loss Report
for Shorelines in the City of Buckley: White River

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NO NET LOSS REPORT
FOR SHORELINES IN THE CITY OF BUCKLEY: WHITE RIVER

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 Buckley's (City) SMP and supporting documents, including the Shoreline Analysis Report, Shoreline Restoration Plan, and Cumulative Impacts Analysis, ensure that ecological functions will not be degraded or minimized over time as the SMP is implemented. The Cumulative Impacts Analysis evaluated the effects of reasonably foreseeable development under the proposed SMP and demonstrated that the goals, policies, and regulations contained in the proposed SMP, combined with recommendations in the Shoreline Restoration Plan, will prevent degradation of ecological functions relative to the existing conditions, as documented in the Shoreline Analysis Report.

2. SHORELINE JURISDICTION

The entirety of the White River within the City qualifies as a Shoreline of Statewide Significance (≥ 1,000 cubic feet per second). Additionally, uplands within 200 feet of the river, any other lands within 200 feet of the river's floodway, and associated wetlands are part of the City's shoreline jurisdiction.

No other water bodies, watercourses, wetlands, or wetland buffers within the City are included in its shoreline jurisdiction.

The total area subject to the City's updated SMP, not including aquatic area, is approximately 187.1 acres (0.29 square miles), spread across 3.04 miles (16,071 linear feet) of White River shoreline.

3. ENVIRONMENT DESIGNATIONS

The following discussion provides a brief overview of the City's process of developing environment designations, beginning with a discussion of the environment designations proposed in the Shoreline Analysis Report and
concluding with a discussion of each of the environment designations proposed in the SMP.

In the Shoreline Analysis Report, the City’s shorelines were divided into three reaches based on existing ecological functions and existing and planned land use (Figure 1). Environment designations were later considered for each reach, based on site-specific conditions and likely changes in land use. The Shoreline Analysis Report concluded that of the standard Washington State Department of Ecology (Ecology) environment designation classifications, the Urban Conservancy designation appeared to be the most appropriate for all three reaches. However, the report noted that a special designation could be created to reflect the unique shoreline uses in Reach 2, specifically the barrier dam and flume.

Figure 1. Shoreline Reaches in the City of Buckley

During the initial development of the SMP with the Planning Commission, in addition to the Urban Conservancy designation, Special Use and Natural designations were included. The Special Use designation was included, as mentioned above, to address the barrier dam and flume. The Natural designation was included because the Planning Commission desired additional protection for certain lands within shoreline jurisdiction.

As the SMP development process continued, further adjustments were made to the environment designation scheme and proposed jurisdiction boundary. For one, the Planning Commission discussed at length the area west of State Route
410. Initially, this area was proposed as Natural but after discussion with Ecology, these lands were later designated as Urban Conservancy to better accommodate the public water supply wells and associated facilities that are planned for this area. Finally, after further discussion, the Planning Commission reverted back to their original position of designated this area as Natural. Additionally, to potentially simplify the SMP, an attempt was made to include the barrier dam and flume as part of the Urban Conservancy designation; however, in the end, the Planning Commission preferred that the barrier dam and flume be addressed by the Special Use designation.

As shown in Figure 1, the area of proposed shoreline jurisdiction initially included both the entire floodplain and potential associated wetlands. However, the proposed shoreline jurisdiction was subsequently revised after the Analysis Report was complete to remove the floodplain except in areas with a designated floodway and floodplain area up to 200 feet landward of the floodway. Potential associated wetlands were also removed due to uncertainty in the accuracy of existing wetland inventory maps.

Figure 2 shows the City’s environment designations as proposed in the SMP. These designations are discussed in more detail in the following subsections.

**Figure 2. Proposed Environment Designations in the City of Buckley SMP.**
3.1 Special Use
The Special Use environment is an environment designation unique to Buckley. According to the proposed SMP, “the purpose of the Special Use environment is to permit established uses and allow maintenance activities. These include the barrier dam on the east side of the City that diverts a portion of the White River into a flume and to Lake Tapps. Maintenance activities include periodically dredging the flume and stockpiling the spoils outside of shoreline jurisdiction.”

The barrier dam and flume addressed by the Special Use designation are the most intensive uses in the City’s shoreline. However, the boundaries for the environment designation were drawn to confine these more intensive uses to a minimum area. Moreover, a management policy for the Special Use designation indicates that “standards shall ensure that development or maintenance activity does not result in a net loss of shoreline ecological functions or further degrade other shoreline values.” Standards addressing the barrier dam and flume uses are principally contained in the In-water Structural Uses section of the SMP, but also in other sections such as Shoreline Stabilization and Water Quality, Stormwater and Nonpoint Pollution.

3.2 Urban Conservancy
The Urban Conservancy environment in the Buckley SMP is very similar to the standard Ecology Urban Conservancy classification. As stated in the SMP, “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 and developed settings, while allowing a variety of compatible uses.”

Compatible uses that are expected to or may occur include public water supply wells, recreational development, and forest practices (particularly on the Washington State Department of Social and Health Services property). A management policy for the Urban Conservancy designation states that “standards shall ensure that new development does not result in a net loss of shoreline ecological functions or further degrade other shoreline values.” Standards addressing likely or potential compatible uses are contained in the Utilities, Recreational Development, and Forest Practices sections of the SMP, among others.

3.3 Natural
The Natural environment is the most restrictive environment designation, and was included specifically at the direction of the Planning Commission. The purpose of the Natural environment, as stated in the SMP, is “to protect those shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline functions intolerant of human use.”
4. GOALS, POLICIES, AND REGULATIONS

The City’s proposed SMP, in Chapter 3, includes several goals supportive of the conservation of shoreline ecological functions. These include the following:

- SMP 3.1.D.4: Cause no net loss of natural systems and/or quality of the shoreline environment.

- SMP 3.3.C: Development that provides public access to the shoreline shall demonstrate it is safe, consistent with the quality of life or property for City residents, and protects fish habitat.

- SMP 3.4.A: Develop and implement management practices that will insure a sustained yield of renewable resources of the shorelines.

- SMP 3.4.B: Protect, enhance, and restore unique and nonrenewable shoreline resources or features, including but not limited to forested areas, wetlands and wildlife habitat.

- SMP 3.4.C: Establish and implement policies and regulations for shoreline use consistent with the Shoreline Management Act of 1971, as amended. These policies and regulations should insure that the overall land use patterns that take place in shoreline areas are compatible with existing shoreline environment designations and are sensitive to, not degrade habitat and ecological systems and other shoreline resources, and provide no net loss of shoreline functions and values.

- SMP 3.4.D: Encourage restoration of shoreline areas that are biologically and aesthetically degraded or diminished in ecological value and function as a result of past activities or catastrophic events.

The City’s Shoreline Analysis Report included several shoreline management recommendations for the updated SMP. Several key recommendations, and discussions of whether or how the proposed SMP implemented these recommendations are identified below:

1. Critical areas

The Shoreline Analysis Report recommended that the City maintain a 200-foot buffer on the White River to the extent consistent with existing conditions and the objectives of the Shoreline Management Act. The City’s critical areas regulations currently include a standard riparian habitat area width for Type 1 watercourses of 150 feet. The proposed SMP provides the same protection as the critical areas regulations with a proposed standard buffer of 150 feet in all shoreline areas.

2. Public access
The Shoreline Analysis Report recommended that the SMP ensure that the development or redevelopment of public access and recreation facilities result in no net loss of ecological functions. Given the expected development or expansion of facilities at Riverside Park, the Planning Commission gave considerable attention to this issue. A key regulation in the proposed SMP promoting no net loss related to public access is that non-water-oriented accessory recreational development, such as restrooms, access roads, parking lots, and maintenance facilities must be located outside shoreline jurisdiction if feasible. An additional protective measure is that permeable trails that run parallel to the shoreline must be set back at least 50 feet. Impervious trails that run parallel to the shoreline must be 150 feet from the OHWM.

3. Boating facilities

The Shoreline Analysis Report recommended limiting boating facilities to boat ramps for public access and prohibiting piers, docks, and other overwater structures associated with boating. Consistent with this recommendation, in the proposed SMP, boating facilities are limited to boat launches for nonmotorized watercraft. Piers and docks are prohibited.

4. Shoreline habitat and natural systems enhancement projects

The Shoreline Analysis Report recommended that the SMP include incentives to encourage restoration projects and to emphasize that certain fills can be an important component of some restoration projects. The SMP includes a policy (6.18.2(D.)) that says the City should give priority to projects consistent with the Shoreline Restoration Plan or other approved restoration plans. Additionally, the SMP includes a number of cases where restoration projects are given elevated permitting status. For example, dredge material disposal is only allowed in shoreline jurisdiction for restoration or habitat improvement (6.9.3(K.)).

In the proposed SMP, a policy explicitly states that “shoreline habitat and natural systems enhancement projects may include shoreline modification actions such as ... fill.” The SMP further emphasizes that fills can be an important component of restoration projects in other locations, such as in Regulation 6.19.3.(I)(1.), which states that “hard and soft shoreline stabilization measures may allow some fill waterward of the OHWM to provide enhancement of shoreline ecological functions.”

5. Prohibited uses and modifications

The Shoreline Analysis Report recommended considering whether the following shoreline uses could be prohibited: agriculture, aquaculture, commercial development, industry, mining, and residential development.
Agriculture and commercial development are restricted to the Urban Conservancy environment. After review of public comments, Aquaculture is allowed in the Special Use, Urban Conservancy, and Aquatic environments. Industry, mining, and residential development are prohibited in all environments.

The Shoreline Analysis Report recommended considering whether piers and docks, as well as breakwaters, jetties, groins, and weirs could be prohibited. Piers and docks, as discussed above, are prohibited under the SMP. Breakwaters, jetties, groins, and weirs are addressed in the In-water Structures section.

5. RESTORATION OPPORTUNITIES

The Shoreline Restoration Plan (Appendix C of the SMP) prepared as part of this SMP update identifies a number of restoration programs and activities that are ongoing or planned for the future and may potentially affect City shorelines. The Shoreline Restoration Plan 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. While the City of Buckley is an active proponent for shoreline restoration, no restoration projects are identified in the Shoreline Restoration Plan.

6. CUMULATIVE IMPACTS

The Cumulative Impacts Analysis determined that the proposed SMP provides a high level of protection to shoreline ecological functions. The report indicated that the proposed SMP, which includes the Shoreline Restoration Plan, is expected to protect and potentially enhance the City’s shorelines while accommodating the limited amount of reasonably foreseeable future shoreline development, resulting in no net loss of shoreline ecological function.

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:

- The majority of the shoreline is designated either Urban Conservancy or Natural.
- Several provisions limit the potential for future shoreline stabilization.
• Emphasis on achieving no net loss of shoreline ecological functions throughout shoreline jurisdiction, including development of water-dependent uses.

7. **CONCLUSIONS REGARDING NO NET LOSS**

The SMP update process provided the opportunity to identify existing environmental conditions, anticipate future impacts to shoreline functions, and identify restoration opportunities within the City’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
2. General provisions
3. Shoreline use and modification provisions
4. Shoreline Restoration Plan

The Shoreline Analysis Report provided the information necessary to assign environment designations to the City’s shoreline. General provisions emphasize avoidance and minimization of ecological impacts, and require mitigation where any impacts to shoreline ecological functions are identified. Shoreline uses and modifications were individually determined to be either permitted (as substantial developments or conditional uses) or prohibited in each of the environment designations. 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.

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 account for local preferences. The proposed SMP emphasizes protection and enhancement of shoreline resources such that no net loss of ecological functions will be achieved over time.

The Shoreline Restoration Plan identifies a number of restoration programs and activities that are ongoing or planned for the future and may potentially affect City shorelines.
In summary, the following key features identified in the proposed SMP protect and enhance shoreline ecological functions:

- Protection of the entire White River shoreline with a 150-foot buffer.
- Protection of the vast majority of the City’s shorelines through Urban Conservancy and Natural environment designations.
- Provisions promoting the retention of native vegetation in shoreline jurisdiction.

Given the above provisions of the SMP, including the Shoreline Restoration Plan, implementation of the proposed SMP is anticipated to achieve no net loss of ecological functions in the City of Buckley’s shoreline.