The following changes are recommended to clarify elements of the City's updated SMP.

<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Table of Contents, Part 4 Page vi</td>
<td>Appendices</td>
<td>Appendix 1 City of Lacey Public Access Plan for Lacey and Lacey's Urban Growth Area Appendix 2 Vegetation/Landscaping Examples and guidelines - Green Shorelines: Examples and Guidelines Appendix 3 Shoreline Restoration Plan for the City of Lacey and the Lacey Urban Growth Area Appendix 4 Original Inventory and Characterization Report and Environmental Designations: Shoreline Inventory for the Cities of Lacey, Olympia, and Tumwater and their Urban Growth Areas Appendix 5 Cumulative Impacts Report Analysis Appendix 6 Shoreline Environmental Designations for the Cities of Lacey, Olympia and Tumwater and their Urban Growth Areas Appendix 7 Referenced City of Lacey Ordinances Used in this Document</td>
<td>These changes are recommended so that the title of the appendix listed in the table of contents matches the title on the actual appendices.</td>
</tr>
<tr>
<td>B</td>
<td>17.15.000 [new] (15), Page 9.</td>
<td>Definitions</td>
<td>(15) <strong>Agricultural activities.</strong> Agricultural uses and practices including, but not limited to: Producing, breeding, or increasing agricultural products; rotating and changing agricultural crops; allowing land used for agricultural activities to lie fallow in which it is plowed and tilled but left unseeded; allowing land used for agricultural activities to lie dormant as a result of adverse agricultural market conditions; allowing land used for agricultural activities to lie dormant because the land is enrolled in a local, state, or federal conservation program, or the land is subject to a conservation easement; conducting agricultural operations; maintaining, repairing, and replacing agricultural equipment; maintaining, repairing, and replacing agricultural facilities, provided that the replacement facility is no closer to the shoreline than the original facility; and maintaining agricultural lands under production or cultivation. This definition of agricultural activities excludes &quot;urban agriculture&quot; as defined in LMC 16.06.747 and as outlined in City of Lacey Ordinance Number 1368, dated June 9, 2011.</td>
<td>Section 17.30.015 of the SMP states that uses not classified in the City’s SMP may be authorized as conditional uses. Agricultural activities are not addressed in Table 3 or in Part Three (Goals, Policies and Development Standards for Uses, Activities and Modifications) of the City's SMP, resulting in such uses qualifying for authorization through the conditional use permit process. The City’s SMP submittal checklist indicates the City does not intend to authorize agricultural activities in shoreline jurisdiction through the SMP because Lacey is an urban area and agricultural uses are not located in Lacey or Lacey’s UGA within shoreline jurisdiction. If the City’s intention is to prohibit agriculture within shoreline jurisdiction through the SMP, Agricultural Activities should be added to Table 3 and prohibited, and a definition of Agricultural Activities consistent with the definition in WAC 173-26-020 (3) should be added to the definitions section of the SMP. This definition excludes &quot;Urban Agriculture&quot;, as defined in LMC 16.06.747, which includes a range of activities including but not limited to private gardens for use of residents of a single family dwelling, urban vegetable gardens on common property for community use, and limited animal husbandry of small farm animals for personal use.</td>
</tr>
<tr>
<td>C</td>
<td>17.15.044 Page 11</td>
<td>Definitions</td>
<td>Commercial Development. Those uses involved in wholesale, retail, service and business trade. Examples include hotels, motels, grocery markets, shopping centers, restaurants, shops, offices and private or public recreation facilities. For purposes of this SMP, this definition does not include Home Occupations as defined and described in LMC 16.69.</td>
<td>This change is suggested at the City’s request. It will ensure that home occupations, which are distinguished from commercial activities and development in the City's Municipal Code based on the intensity of activities and other characteristics, are not prohibited in dwellings that fall within shoreline jurisdiction.</td>
</tr>
<tr>
<td>D</td>
<td>17.15.049 Page 11</td>
<td>Definitions</td>
<td>Critical Freshwater Habitats. Designated areas of streams, rivers, wetlands and lakes, their associated channel migration zones and flood plains. River and stream corridors from the headwaters to the mouth and including the channel, associated channel migration zones, wetlands and the floodplain to the extent such areas fall in shoreline jurisdiction, including hydrologic connections between water bodies, water courses, lake basins and associated wetlands.</td>
<td>This change is suggested so that the definition of critical freshwater habitat in the SMP better aligns with the definition given in WAC 173-26-221 (2) (c) (iv) and identifies the overlap between critical freshwater habitats in the SMP and freshwater critical areas in the City's critical area ordinances.</td>
</tr>
<tr>
<td>E</td>
<td>17.15.132</td>
<td>Definitions</td>
<td>Low-Intensity Water-Oriented Commercial. See &quot;Commercial, Low Intensity Water-Oriented&quot;.</td>
<td>It is suggested this definition be stricken; the term it refers to (Commercial, Low Intensity Water-Oriented) should be used in its place.</td>
</tr>
<tr>
<td>Item</td>
<td>SMP Provision</td>
<td>Topic</td>
<td>Bill Format Changes [underline-additions; strikethrough-deletions]</td>
<td>Ecology - Discussion/Rational</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>-----------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td></td>
<td>Page 17</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>F</td>
<td>17.15.201 and 17.15.202</td>
<td>Definitions</td>
<td>Recreation, High Intensity. Involves uses and activities that provide for increased public enjoyment of the shorelines and adjacent areas. Examples of such uses may include parks, playgrounds, athletic fields, campgrounds, and boat ramps. High intensity uses may require earth modification and construction of a variety of structures. Recreation, Low Intensity. Involves activities such as hiking, canoeing, viewing, nature study, photography and fishing. Low intensity uses do not typically require extensive preparation of facilities.</td>
<td>It is suggested these definitions be stricken; the terms are not used within the SMP and the text of the SMP do not differentiate between low and high intensity recreational uses and activities.</td>
</tr>
<tr>
<td>G</td>
<td>17.15.220 Page 22</td>
<td>Definitions</td>
<td>Scientific Education. Any activity undertaken for the support of public or private science education, such as scientific studies, classroom field trips and observation, interpretive trails and similar generally low impact activities. This category also includes sites and areas having scientific and educational values. For the purposes of this SMP this term does not include development of structures for habitation or institutional education such as schools or museums.</td>
<td>It is suggested this definition be revised to include sites that provide value for these activities in addition to just the uses/activities themselves being addressed. This ensures that policies and standards related to these uses address them but also address uses and activities of other sites that may occur on lands meeting this definition.</td>
</tr>
<tr>
<td>H</td>
<td>17.15.274 Page 28</td>
<td>Definitions</td>
<td>Utilities, Accessory. Those small-scale on site distribution services connected directly to a primary use located on the shorelines.</td>
<td>This change is suggested to better align the definition with the description of accessory utilities in WAC 17-26-241 (3) (l).</td>
</tr>
<tr>
<td>I</td>
<td>17.20.027 Page 32</td>
<td>Shoreline Jurisdiction and Relationship to Buffers</td>
<td>For the purposes of this SMP, the shoreline jurisdiction shall not include the buffer of an associated wetland or other critical area buffer, unless the exception portions of the buffer located on shorelines are within 200 feet of the OHWM.</td>
<td>This change is suggested to clarify that this provision applies not only to wetland buffers but also to buffers for all critical areas that are located within shoreline jurisdiction.</td>
</tr>
<tr>
<td>J</td>
<td>17.20.050 Page 33</td>
<td>Natural - Designation Criteria</td>
<td>Uses that adversely impact the ecological functions of critical saltwater and freshwater habitats should not be allowed except where necessary to achieve the objectives of RCW 90.58.020, and then only when their impacts are mitigated according to the sequence described in Section 17.40.015 of this SMP as necessary to assure no net loss of ecological functions.</td>
<td>This change is suggested to refer to the mitigation sequence as incorporated into the City’s SMP rather than the mitigation sequence as it exists in the WAC. They are the same sequence but it is preferred that the City refer to its own SMP rather than the WAC for clarity, when possible.</td>
</tr>
<tr>
<td>K</td>
<td>17.20.060 Page 34</td>
<td>The Department of Ecology guidelines state that the natural environment designation should be applied to shoreline areas if any of the following characteristics apply: 1. The shoreline is ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity; 2. The shoreline is considered to represent ecosystems and geologic types that are of particular scientific and educational interest;</td>
<td>This change is suggested to remove reference to the WAC and the Guidelines, and to use an active voice, when communicating decisions the City has made relative to assigning environment designations. The original wording was also repetitive, so changes are suggested to remove duplicative discussions.</td>
<td></td>
</tr>
</tbody>
</table>
ITEM | SMP PROVISION | TOPIC | BILL FORMAT CHANGES | ECOSYSTEM - DISCUSSION/RATIONAL |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>The shoreline is unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.</td>
<td>Lacey’s shoreline areas that meet this criteria include largely undisturbed portions of shoreline areas with wetlands, the Woodland Creek stream corridor system and the ecologically intact shoreline habitat by Butterball Cove in the Hawks Prairie Planned Community. Ecologically intact shorelines, as used here, means those shoreline areas that retain the majority of their natural shoreline functions, as evidenced by the shoreline configuration and the presence of native vegetation. Lacey’s ecologically intact shorelines around Hicks Lake and the Woodland Creek corridor are generally free of structural shoreline modifications, structures, and intensive human uses. These areas have been designated as OSI under Lacey’s zoning code for over a decade to protect wetland areas. Prior to that time they were not developed because other properties that were easier to develop were available. The Woodland Creek area and the marine area in the Hawks Prairie Planned Community are also considered “ecologically intact”. These areas are generally forested and include native vegetation with diverse plant communities, multiple canopy layers, and the presence of large woody debris available for recruitment to adjacent water bodies. These areas have also been protected by critical area regulations and owners that have been good land stewards. Much of the Woodland Creek corridor is under the ownership of Saint Martin’s University Abbey which has placed a high priority on preservation of the Creek’s natural functions and values and has protected the Creek from development. The Hawks Prairie Planned Community also included protection of the marine area by designating it as open space and protecting its natural character.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>L</td>
<td>17.20.066 Page 35</td>
<td>Urban Conservancy - Designation Criteria</td>
<td>The urban conservancy environment designation has been applied to shoreline areas appropriate and planned for development that is compatible with maintaining or restoring the ecological functions of the area.</td>
<td>This change is suggested to assist in readability; the City used the designation criteria in the Guidelines and some text is missing.</td>
</tr>
<tr>
<td>M</td>
<td>17.20.100 Page 37</td>
<td>Official Map</td>
<td>Approximate Shoreline Jurisdiction and the Shoreline Environment Designations are delineated on a map, hereby incorporated as a part of this SMP that shall be known as the “City of Lacey Shoreline Master Program Map”; see Map 1, Appendix 6.</td>
<td>This change is suggested to clearly indicate that the boundaries of shoreline jurisdiction and environment designations as shown on the map are approximate; the criteria in the SMA and SMP will control.</td>
</tr>
<tr>
<td>N</td>
<td>17.24.000 Page 41</td>
<td>Tables</td>
<td>Uses and Activities: A. Guidelines (baseline expectations) for vegetative restoration improvements, when required, are provided in Section 17.41.021 Table 1. D. When there are no development standards for a specific use or activity, application for such use or activity shall be processed as a CUP and the design of the proposed use shall satisfy the goals and policies in sections 17.44, 17.45.000, 17.45.010, 17.45.015 and promote no net loss of shoreline ecological functions.</td>
<td>These changes are suggested for clarification, accuracy, readability and consistency between sections of the SMP.</td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP Provision</td>
<td>Topic</td>
<td>Bill Format Changes [underline-additions; strikethrough-deletions]</td>
<td>Ecology - Discussion/Rational</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>O</td>
<td>17.24.010 Page 42</td>
<td>Table 3</td>
<td></td>
<td>The change to marinas is suggested to avoid conflicts with Section 17.49.020, which prohibits new marinas until and unless the Comprehensive Plan for Outdoor Recreation demonstrates a need. The new footnote is suggested to refer to Section 17.49 for this information, and to recognize that the existing marina in the urban conservancy designation will not become nonconforming as a result of this provision.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>USES &amp; ACTIVITIES</th>
<th>Shoreline Residential</th>
<th>Urban Conservancy</th>
<th>Natural</th>
<th>Aquatic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boating Facilities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Launch Ramps</td>
<td>S</td>
<td>S</td>
<td>C</td>
<td>S*</td>
</tr>
<tr>
<td>Marinas</td>
<td>X</td>
<td>X/S-</td>
<td>X</td>
<td>S*</td>
</tr>
<tr>
<td>Covered Moorage</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

(Refer to Table 5 for Piers and Docks)

<table>
<thead>
<tr>
<th>Historical or Archeological Protection, Rehabilitation and Restoration</th>
<th>N/A</th>
<th>N/A</th>
<th>N/A</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation</td>
<td>C</td>
<td>C</td>
<td>C</td>
<td>C</td>
</tr>
<tr>
<td>Water-dependent</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>S</td>
</tr>
<tr>
<td>Water-related</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>S</td>
</tr>
<tr>
<td>Water-enjoyment</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>C</td>
</tr>
<tr>
<td>Non-water oriented</td>
<td>C1 / S2</td>
<td>C1 / S2</td>
<td>X1 / C2</td>
<td>X</td>
</tr>
<tr>
<td>Pedestrian trail, surfaced with wood chips or other natural permeable material, Designed to minimize impact to shoreline functions and values</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Pedestrian trail in a boardwalk design in sensitive area or buffer for public access, Designed to minimize impacts to shoreline functions and values</td>
<td>N/A</td>
<td>S</td>
<td>S</td>
<td>N/A</td>
</tr>
<tr>
<td>Scientific or Educational</td>
<td>S</td>
<td>N/A***</td>
<td>S</td>
<td>N/A***</td>
</tr>
</tbody>
</table>

Pedestrian trails are suggested to be moved from the Transportation Use and Activity section of this Table to the Recreation section, for consistency with Part Three of the SMP.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOSYSTEM - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Signage</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>On Premise and Way Finding</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Off Premise</td>
<td>X</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Transportation</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Roads and Railroads</td>
<td>C1 / S2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Shared Use Path</td>
<td>S</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Pedestrian trail surfaced with wood chips or</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>other natural permeable material. Designed to</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>minimize impact to shoreline functions and</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>values</td>
<td>S</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Pedestrian trail in a boardwalk design or</td>
<td>S</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>sensitive area or buffer for public access.</td>
<td>E</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Designed to minimize impacts to shoreline</td>
<td>S</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>functions and values.</td>
<td>S</td>
</tr>
</tbody>
</table>

+ New marinas are prohibited until and unless the City’s Comprehensive Plan for Outdoor Recreation demonstrates a need. See additional provisions in Section 17.49.020.

NA = Not applicable, refer to the appropriate Master Program section for additional standards. Such uses and activities may not meet the definition of development or threshold to be considered “substantial development.”

P 17.24.010 & 17.24.020 Pages 42, 43, 46 & 47 Tables 3 & 4 footnotes 1 = Within one hundred (100) feet from the ordinary high water mark 2 = From one hundred (100) feet from the OHWM to the landward edge of the shoreline jurisdiction

These changes are suggested for readability, clarity and to correct a minor typographical error.

Q 17.24.015 Page 45 Table 4 - Development Standards This change is recommended for consistency. The definition of boating facilities in the City’s SMP does not include piers and docks. Piers are included in the definition of shoreline modifications. Piers and docks are also referred to as shoreline modifications in Table 3. For these reasons reference to piers and docks should be removed from this table. In addition,
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECMOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Boating Facilities (Boat Launches, Marinas, Piers and Docks)</td>
<td>OHWM setbacks and building heights do not apply to piers and docks. Marinas are defined as boating facilities in the City’s SMP and are addressed in Table 3 so should be added to the same cell in Table 4.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Water-dependent OHWM setback[^6] Building height</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0’ 30’ 0’ 30’ 25’ 20’</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Water-related OHWM setback[^6] Building height</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>15’ 30’ 15’ 30’ 25’ NA</td>
<td></td>
</tr>
</tbody>
</table>

This change is suggested to incorporate the information regarding minimum lot size and minimum lot width from the Residential section of the SMP (17.63) into Table 4. The addition of a new footnote is suggested to allow for development options related to lot size and width such as clustering.

### Table 4 - Development Standards

<table>
<thead>
<tr>
<th>USES &amp; ACTIVITIES</th>
<th>Shoreline Residential</th>
<th>Urban Conservancy</th>
<th>Natural</th>
<th>Aquatic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Single-Family Dwellings</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum Density</td>
<td>4* du/ac 1 du*/ac</td>
<td>1 du*/10 ac</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>OHWM Setback[^6]</td>
<td>50’ 100’</td>
<td>150’</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Building Height</td>
<td>35’ 35’</td>
<td>35’</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Max. Imp. Surfaces</td>
<td>50% 30%</td>
<td>10%</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Min. Lot Size/Width</td>
<td>7,500 ±5’50’</td>
<td>±50’</td>
<td>±50’</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Attached Single Family &amp; Multi-Family Dwellings</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maximum Density</td>
<td>4* du/ac 1* du*/ac</td>
<td>1* du*/1 ac****</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>OHWM Setback[^6]</td>
<td>50’ 100’</td>
<td>150’</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Building Height</td>
<td>35’ 35’</td>
<td>35’</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Max. Imp. Surfaces</td>
<td>50% 30%</td>
<td>10%****</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Min. Lot Size/Width</td>
<td>– –</td>
<td>–</td>
<td>–</td>
<td>N/A</td>
</tr>
<tr>
<td>Accessory structures</td>
<td>50 100</td>
<td>150</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

[^6]: Refer to residential lot size and width provisions in Section 17.63.025.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLoGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>17.24.015</td>
<td>Page 45</td>
<td>Table 4 - Development Standards</td>
<td></td>
<td>The first change (relocation of standards for pedestrian trails and shoreline access segments) is suggested for consistency with Part Three of the SMP. See also 0 above. Deletion of text related to parking and transportation facilities is suggested for clarity and consistency. Table 3 indicates that these uses should be located outside of shoreline jurisdiction on naturally designated shoreline when feasible; however, the policies and regulations in Part Three of the City’s SMP applicable to parking facilities, roads and railroads indicate that these uses should be located outside of shoreline jurisdiction when feasible without specific reference to the natural designation. WAC 173-26-241 (3) (k) and (l) state that transportation, parking and utility uses and developments should not occur within shoreline jurisdiction unless no other feasible options are available. This direction in the Guidelines is also not specific to naturally designated shorelines. The text in Part Three of the SMP accurately applies this provision to these uses in all shoreline environments, and striking this language from Table 4 would better align with provisions in other sections of the SMP and ensure consistency with the Guidelines.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>USES &amp; ACTIVITIES</th>
<th>Shoreline Residential</th>
<th>Urban Conservancy</th>
<th>Natural</th>
<th>Aquatic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water-dependent</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OHWM Setback</td>
<td>25'</td>
<td>25'</td>
<td>25'</td>
<td>NA</td>
</tr>
<tr>
<td>Building Height</td>
<td>25'</td>
<td>25'</td>
<td>25'</td>
<td>10'</td>
</tr>
<tr>
<td>Water-related &amp; enjoyment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OHWM Setback</td>
<td>50'</td>
<td>50'</td>
<td>50'</td>
<td>NA</td>
</tr>
<tr>
<td>Building Height</td>
<td>25'</td>
<td>25'</td>
<td>25'</td>
<td>10'</td>
</tr>
<tr>
<td>Nonwater-oriented</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OHWM Setback</td>
<td>100'</td>
<td>100'</td>
<td>100'</td>
<td>NA</td>
</tr>
<tr>
<td>Building Height</td>
<td>25'</td>
<td>25'</td>
<td>25'</td>
<td>10'</td>
</tr>
<tr>
<td>Shared Use Path</td>
<td>25'***</td>
<td>50'***</td>
<td>75'***</td>
<td>N/A</td>
</tr>
<tr>
<td>OHWM setback@</td>
<td>0'</td>
<td>0'</td>
<td>0'</td>
<td></td>
</tr>
<tr>
<td>Pedestrian trails and Shoreline Access Segment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking facilities (surface)</td>
<td>50'</td>
<td>75'</td>
<td>150' (minimum and outside shoreline jurisdiction if possible as determined by Administrator)</td>
<td>N/A</td>
</tr>
<tr>
<td>Transportation Roads and Railroads</td>
<td>50'</td>
<td>75'</td>
<td>150' (minimum and outside shoreline jurisdiction if possible as determined by Administrator)</td>
<td>NA</td>
</tr>
<tr>
<td>OHWM setback@</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shared Use Path</td>
<td>25'***</td>
<td>50'***</td>
<td>75'***</td>
<td>N/A</td>
</tr>
<tr>
<td>OHWM setback@</td>
<td>0'</td>
<td>0'</td>
<td>0'</td>
<td></td>
</tr>
<tr>
<td>Pedestrian trails and Shoreline Access Segment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>T</td>
<td>17.24.015</td>
<td>Table 4 - Residential Development and footnotes</td>
<td>@ = Refer to shoreline vegetation conservation provisions in Sections 17.40.030 to 17.40.040. <strong>Provided additional density credit may be available through an incentive dedication agreement.</strong></td>
<td>The first change is suggested because the section referred to containing vegetation conservation provisions has changed from previous versions of the SMP. <strong>Housing must be clustered and be have a designed to have the least impact to shoreline resources, including utilization of low impact development techniques.</strong> Emphasis is to encourage use of incentive programs, providing higher value and density opportunities when shoreline area is dedicated to the public. Under incentive programs all development and associated density is transferred out of shoreline jurisdiction to a designated receiving area.</td>
</tr>
<tr>
<td>U</td>
<td>17.24.020</td>
<td>Table 5 - Shoreline Modification</td>
<td>SHORELINE MODIFICATIONS</td>
<td>The first change is suggested because the SMP currently defines clearing, grading, fill and dredging. Clearing is addressed in Section 17.41 (Vegetation Management) of the SMP. Dredging and fill are addressed as shoreline modifications in specific sections of Part Three of the SMP. Upland grading is not addressed in the SMP. This change is recommended to ensure upland grading is recognized and addressed in the SMP. <strong>Allowed by conditional use provided there is a demonstrated need, it is the most ecologically friendly way of beach access, the scope of the project is the least amount of modification necessary to accomplish the objectives and all impacts have been mitigated.</strong></td>
</tr>
<tr>
<td>V</td>
<td>17.24.020</td>
<td>Table 5 - Shoreline Modification</td>
<td>SHORELINE MODIFICATIONS</td>
<td>Changes to the table and footnote are suggested for consistency; through the SMP the term cost was used interchangeably with value in this situation. The City has indicated its desire was to use value, not cost, which is less subjective and can be consistently calculated for all types of projects using the process described in the footnote. The asterisks used for the footnote should be tied to the table by adding them to the first column. The second change to the footnote (striking the last sentence) is suggested for readability, because the meaning is unclear.</td>
</tr>
</tbody>
</table>

**Notes:**
- **S** = Shoreline Residential
- **C** = Conservancy
- **N** = Natural
- **A** = Aquatic

- **Grading and Fill**
  - Ecological Restoration Project: S S S S
  - All Other Activities: C C X C

- **Stair Tower**
  - C X C X X

Changes to the table and footnote are suggested for consistency; through the SMP the term cost was used interchangeably with value in this situation. The City has indicated its desire was to use value, not cost, which is less subjective and can be consistently calculated for all types of projects using the process described in the footnote. The asterisks used for the footnote should be tied to the table by adding them to the first column. The second change to the footnote (striking the last sentence) is suggested for readability, because the meaning is unclear.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP Provision</th>
<th>Topic</th>
<th>Bill Format Changes [underline-additions; strikethrough-deletions]</th>
<th>Ecology - Discussion/Rational</th>
</tr>
</thead>
<tbody>
<tr>
<td>W</td>
<td>17.25.000</td>
<td>Non-conforming Uses, Lots and Structures</td>
<td>The repair and value will be calculated from the International Building Code Tables used to calculate the value of improvements for determining the cost of permits. If no value can be assigned from the IBC, other means for determining the “Fair market value” will be utilized. The value assigned will be for a new structure and the cost of repair will be the value assigned the work required for full repair.</td>
<td>Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section. The recommended changes can be generally characterized as achieving consistent use of terms, clarification regarding policies and regulations applying to structures versus uses, and removal of repetitive and unnecessary and sometimes confusing of conflicting language. Other suggested changes clarify that to be considered nonconforming under this Section, a use or structure must have been legally established, as defined in Section 17.15 of the SMP. Finally, some changes are suggested to reflect conversations with the City surrounding consistent use of the term “vegetation management area” in place of the previously used term “buffer”, to distinguish these areas from a critical area buffers. Because of the scope of the recommended changes, Exhibit C-1 was created. This attachment illustrates all of the recommended changes to this section of the SMP in bill format. Please note there are required changes to this section as discussed in Attachment B (Department of Ecology Required Changes to the City of Lacey October 15, 2010 SMP). Exhibit C-1 to this document also reflects those required changes.</td>
</tr>
<tr>
<td></td>
<td>through 17.25.055 Pages 49-58</td>
<td></td>
<td>Please see exhibit C-1.</td>
<td></td>
</tr>
<tr>
<td>X</td>
<td>17.30.000</td>
<td>Shoreline Permits</td>
<td>Shoreline permits and exemptions shall be processed according to the procedures described in Section Chapter I of the City Development Guidelines and Public Works Standards.</td>
<td>This change is suggested because they Development Guidelines and Public Works Standards are organized by Chapter, not Section, and the referenced procedures are in Chapter 1.</td>
</tr>
<tr>
<td></td>
<td>Page 59</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Y</td>
<td>17.30.020 (2)</td>
<td>Shoreline Variance Permit</td>
<td>Variance permits for development and/or uses that will be located landward of the ordinary high water mark (OHWM) as defined in RCW 90.06.030 (2)(b) and/or landward of any wetland as defined in RCW 90.06.030 (2)(h). This Master Program may be authorized provided the applicant can demonstrate all of the following:</td>
<td>This change is suggested to refer to these definitions as incorporated into the City’s SMP rather than the definitions as they exist in the RCW. They are the same definitions but it is preferred that the City refer to its own SMP rather than the RCW for clarity, when possible.</td>
</tr>
<tr>
<td></td>
<td>Page 60</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Z</td>
<td>17.30.020 (3)</td>
<td>Shoreline Variance Permit</td>
<td>Variance permits for development and/or uses that will be located waterward of the ordinary high water mark (OHWM) as defined in RCW 90.06.030 (2)(b) or within any wetland as defined in RCW 90.06.030 (2)(h). This Master Program may be authorized provided the applicant can demonstrate all of the following:</td>
<td>This change is suggested to refer to these definitions as incorporated into the City’s SMP rather than the definitions as they exist in the RCW. They are the same definitions but it is preferred that the City refer to its own SMP rather than the RCW for clarity, when possible.</td>
</tr>
<tr>
<td></td>
<td>Page 61</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AA</td>
<td>17.30.020 (6)</td>
<td>Shoreline Variance Permit</td>
<td>Water-oriented and water-related uses may be located within the required shoreline buffer setback and vegetation management area without a shoreline variance, provided other required permits are obtained and the mitigation sequence is followed. Size of the variation has been minimized to the extent needed. Uses that may locate within the buffer setback and vegetation management area without a variance include the following:</td>
<td>The first and third change are suggested to reflect conversations with the City surrounding consistent use of the term “vegetation management area” in place of the previously used term “buffer”, which may confuse the reader as it is different than a critical area buffer. Reference to the mitigation sequence is suggested as it clarifies that not only must impacts be avoided and minimized even if no variance is required, but compensatory mitigation for impacts may be necessary.</td>
</tr>
<tr>
<td></td>
<td>Page 61</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BB</td>
<td>17.30.040</td>
<td>Letter of Exemption</td>
<td>All uses, land and water alterations, and development that are not defined as substantial developments are exempted from the requirement to obtain a Shoreline</td>
<td>These changes are suggested to remove duplicative language, make the document more concise, and reduce repetition.</td>
</tr>
<tr>
<td></td>
<td>Page 64</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Substantial Development Permit</strong>. However, these developments must still comply with the standards of the Shoreline Master Program. In addition, these developments may still need a Shoreline Conditional Use Permit or a Shoreline Variance.</td>
<td>These changes are suggested for readability and clarity.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A project The proponent of a project that qualifies for an exemption must obtain confirmation that it conforms to the Shoreline Master Program and to state law. If it conforms, a letter of exemption will be issued stating that there are no further shoreline permits to obtain, and may contain conditions which the proponent must meet.</td>
<td>Changes removing the word “structure” in this section are suggested to remedy conflicts in the SMP. In some parts of the SMP this provision was said to refer to structures AND modifications, and in others it was drafted to apply only to modifications. The City clarified that its intent was only to apply this provision to modifications; therefore these changes are suggested for consistency throughout the document. Additional textual changes are suggested for clarification and readability.</td>
</tr>
<tr>
<td>CC</td>
<td>17.30.045</td>
<td>Unclassified Uses</td>
<td>This program does not attempt to identify or foresee all conceivable shoreline uses or types of development. When a use or development is proposed which is not readily classified within an existing use or development category, it shall require a conditional use permit. During processing of the permit application, the Administrator and Hearing Examiner shall identify and apply those program policies and regulations which will best promote the policies of the Shoreline Management Act and the Shoreline Master Program, with special reference to the policies of the environmental designation in which the use will be located. In addition, general goals, policies and standards shall also apply.</td>
<td>These changes are suggested for readability and clarity.</td>
</tr>
<tr>
<td></td>
<td>Page 64</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| DD   | 17.30.047     | Maintenance Threshold for Exemptions | **17.30.047 Maintenance and Repair Activities : Exemption Threshold and Activity Not Exempted; Policy for Maintenance of Structures and Modifications**

1. Normal maintenance and repairs to an existing structure or shoreline modification (see description of modification in Section 17.45.000), shall be exempt from permits acquiring a substantial development permit in accordance with Section 17.30.035 if such repair and maintenance have activities are valued at less than 50% of the replacement value of the structure or modification.

2. Where the value of repair of an existing structure or modification, is equal to or exceeds 50% of the replacement value, it shall be considered a replacement and a new conditional use permit or approval shall be required. The approval or permit process for replacement of a structure shall be the process identified for if it was a new structure which may include a letter of exemption, substantial development permit, conditional use permit or variance. Replacement of a modification shall always be processed as a conditional use permit.

3. When a new approval or conditional use permit is required for replacement and the existing structure or modification does not meet existing shoreline standards in this SMP and may be having an adverse impact on shoreline functions and values, review shall include consideration of, and preference for, other more ecologically sound practices that can achieve the same function.

4. A project The proponent of a project that qualifies for an exemption must obtain confirmation that it conforms to the Shoreline Master Program and to state law. If it conforms, a letter of exemption will be issued stating that there are no further shoreline permits to obtain, and may contain conditions which the proponent must meet. | Changes removing the word “structure” in this section are suggested to remedy conflicts in the SMP. In some parts of the SMP this provision was said to refer to structures AND modifications, and in others it was drafted to apply only to modifications. The City clarified that its intent was only to apply this provision to modifications; therefore these changes are suggested for consistency throughout the document. Additional textual changes are suggested for clarification and readability. |
<p>|      | Page 64       |       |                                                               |                               |</p>
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLoGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>and is not a permitted use, consideration shall be given to not approving replacement and the planned abandonment or removal of the structure or modification.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td>Placement of a modification or replacement of an existing modification designed for stabilization must be designed for protection or stabilization of a residence(s) that is in danger from active erosion. Such modification may be permitted through a conditional use permit, if it is demonstrated by a qualified geotechnical engineer, that it is the only feasible way to protect the residence(s), and such modification will not result in a net loss of ecological function or otherwise conflict with the public’s interest.</td>
<td></td>
</tr>
<tr>
<td>EE</td>
<td>17.35.010 Page 67</td>
<td>Compliance with Existing Development Regulations</td>
<td>Use and developments within shoreline jurisdiction shall comply with City development standards, and applicable state and federal regulations, provided they do not conflict with the shoreline goals, shoreline policies, and development regulations of this program. In the case of conflicts between specific standards and regulations the most restrictive shall usually apply and shoreline goals and policies of the SMA and this Master Program shall always guide interpretation of the most appropriate standard to apply.</td>
<td>These changes are recommended to specifically highlight the origin of the shoreline ‘goals and policies’ referenced in the provision.</td>
</tr>
<tr>
<td>FF</td>
<td>17.35.020 (1) (A) and (C) Page 68/69</td>
<td>Critical Area Regulations within Shoreline Jurisdiction</td>
<td>A. Exceptions of certain provisions in conflict with the intent of the SMP: 1) “Exempt uses and activities” or “exceptions” or “exemptions” - LMC 14.28.140, LMC 14.33.080, and LMC 14.37.080. The only “exemptions” allowed within shoreline jurisdiction are those listed as being exempt from a shoreline substantial development permit. See Section 17.30.035. 2) “Administratively authorized uses and activities” or “allowed activities” - Any activity which is not exempt within shoreline jurisdiction will require a shoreline substantial development permit, shoreline conditional use permit, or shoreline variance. 3) “Reduction of standard buffer zone width” - LMC 14.28.300. Reduction of the standard Critical Area Ordinance wetland buffer width within shoreline jurisdiction shall be prohibited may be permitted in accordance with subsection (C) below. When outside the shoreline residential designation, reductions may be permitted in accordance with the provisions outlined in LMC 14.28.300 when not used in combination with provisions for buffer averaging. Further reductions will require a shoreline variance. 4) “Administrative variances” - Administrative variances, being variances authorized by the administrator without the use of a shoreline variance, are prohibited within shoreline jurisdiction. 5) “Standard buffer width averaging” - LMC 14.28.310, LMC 14.33.116 G (3) and LMC 14.33.117 D (4). Critical Area Ordinance Wetland buffer averaging within shoreline jurisdiction is not permitted when used in combination with buffer reduction. If averaging is permitted, the buffer width shall not be reduced by more than 25% of the standard buffer or be less than 35 feet in any location; further averaging will require a shoreline variance. In the case of an associated wetland, the edge of the wetland is the edge of the shoreline jurisdiction. Habitat buffers for both riparian and non-riparian habitats may be averaged if such averaging does not result in a buffer width of less than 75% of the recommended buffer width. Averaging may not be used in combination with reductions.</td>
<td>Changes to subsection A are recommended to specifically highlight provisions in the City’s critical areas ordinance (CAO) that are not being incorporated into the SMP, or areas where review processes or conditions outlined in the CAO will differ because the critical area is located within shoreline jurisdiction. Ecology has typically agreed with buffer averaging and reduction provisions that allow reductions of up to 25% to standard critical area buffer, with the application of the additional criteria outlined in the suggested language. As of March 14, 2011 Ecology has repealed the Washington State wetland delineation manual referenced in Lacey’s wetland protection code and replaced it with a revision to the Washington Administrative Code stating that wetland delineations be done in accordance with the currently approved federal manual and supplements.</td>
</tr>
</tbody>
</table>
Further averaging will require a shoreline variance.

6) "Reduction to wetland replacement ratios" - A reduction of the wetland replacement ratio within shoreline jurisdiction will require a shoreline variance.

7) "Reasonable use exception" - LMC 14.28.350 (E). Within a shoreline jurisdiction, a shoreline conditional use permit and/or shoreline variance will serve as a reasonable use exception review. The Administrator shall determine whether a CUP or variance is required depending upon the proposed activity and purpose for which relief is sought; see Sections 17.30.015 to 17.30.020 of the SMP.

8) LMC 14.28.090, Determination of Wetland Boundary - within shoreline jurisdiction, identification of wetlands and delineation of their boundaries shall be done in accordance with the approved federal wetland delineation manual and applicable regional supplements. See WAC 173-21-035.

C. Exception related to buffer widths for freshwater critical areas in the shoreline residential zone: Within the shoreline residential environment designation zone, buffers for freshwater critical habitat areas along lake front platted lots will dovetail may be reduced to match setbacks from the OHWM as identified for the most intensive use expected for the property as illustrated in Section 17.24.015, Table 4; see Section 17.35.037.

Changes to subsection C are suggested for clarification.

Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section. The City depended largely on the State’s Aquatic Habitat Guidelines (AHG) white paper “Protection of Marine Riparian Functions in Puget Sound, Washington” to address these shoreline areas. The white paper was written as guidance rather than in a prescriptive fashion typical of development regulations. Therefore, it was not appropriate to incorporate findings, conclusions and recommendations from the white paper into the SMP as standards.

The recommended changes can be generally characterized as clarification regarding policies versus regulations and removal of repetitive or inaccurate language. Because of the scope of the recommended changes, Exhibit C-2 was created. This attachment illustrates all of the recommended changes to this section of the SMP in bill format. Please note there are required changes to this section as discussed in Attachment B (Department of Ecology Required Changes to the City of Lacey October 15, 2010 SMP). Exhibit C-2 to this document also reflects those required changes.

Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section. The language in this section is unclear as to where it applies. The section also conflicts with provisions in the City’s Critical Areas Ordinances that were not made exceptions from this SMP in Section 17.35.020.

The recommended changes can be generally characterized as clarification regarding policies versus regulations and removal of repetitive or inaccurate language. Because of the scope of...
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>II</td>
<td>17.40.005 Page 87</td>
<td>General Provisions</td>
<td>The SMA and the Guidelines for the SMP place an emphasis on the protection of ecosystem-wide processes and ecological functions. This SMP must contain policies, regulations and standards sufficient to ensure that shoreline uses and modifications activities will promote designed to achieve “no net loss” of these processes and functions. To accomplish this objective, Lacey has developed this SMP with the necessary goals, policies and development regulations to assure development within the shoreline jurisdiction will promote no loss of ecological functions necessary to sustain the natural shoreline.</td>
<td>This change is recommended for consistency with the wording of introductory statements regarding no net loss that occur in the Guidelines [WAC 173-26-186 (8) (b)].</td>
</tr>
</tbody>
</table>
| JJ   | 17.40.007 (2) Page 87 | Goals and Policies for Ecological Protection | A. Policy: Require a buffer of vegetation management area, appropriate to each designation and expected use, to promote the natural functions of stormwater absorption and treatment and promote water quality and natural habitat functions and values.  
B. Policy: Allow alternatives for vegetation improvements within the vegetation management area as long as the landscaping buffer area will achieve similar results in mitigating upland development and impacts of urbanization on the shorelines natural functions and values. | These changes are suggested to reflect conversations with the City surrounding consistent use of the term “vegetation management area” in place of the previously used term “buffer”, which may confuse the reader as it is different than a critical area buffer. |
| KK   | 17.40.007 (3) (E) Page 88 | Goals and Policies for Ecological Protection | To balance public access and use of shoreline resources with ecological function, Lacey will consider offsite mitigation and restoration consistent with priorities in the City’s Restoration Plan. Offsite mitigation and restoration will can be used to achieve no net loss on a community wide basis if this cannot be achieved onsite. | This change is suggested to differentiate between mitigation and restoration (see required change 10 on Appendix B) and to clarify that offsite mitigation “can” be used, at the City’s discretion, not that it ‘will’ be used, implying it will be required. |
| LL   | 17.40.007 (4) and (4) (E) Page 88 | Goals and Policies for Ecological Protection | Goal: Achieve restoration goals appropriate to the shorelines designation in developed areas. Promote new development only where appropriate for the shoreline designation and ensure all development is sensitive to and protects ecological processes and functions.  
E. Policy: Locate and design structures along the shoreline to ensure future shoreline stabilization will be unnecessary. | The first change is suggested because none of the supporting policies A through E speak to this topic or support this part of this goal statement. Policies A through E are very specific to balancing development with ecological protection. The second change is suggested because it is duplicative of Policy A. |
| MM   | 17.40.020 Page 89 | Development Standards for Ecological Functions | 17.40.020 General Development Standards for Protection of Ecological Functions  
A. General goals, and policies and standards applicable to all uses, activities and modifications in Sections 17.44 and 17.45.  
B. General goals, policies and standards for uses and modifications in Sections 17.46 through 17.70. | The first change is suggested for clarity (removal of “general”) and consistency (section titling in rest of SMP). Changes to A and B are also suggested for consistency in titling, as well as to emphasize that satisfaction of ALL of the components in each of the referenced sections is required, not just the components listed in the original wording. |
<p>| NN   | 17.40.020 (2) Page 89 | Development Standards for Ecological | Buffers Vegetation Management Areas, when critical areas are not present: Where no designated critical area exists within shoreline jurisdiction, a general buffer vegetation management area shall be required to overlay the setback from the OHWM for the primary and most intensive use planned for the site. | These changes are suggested to reflect conversations with the City surrounding consistent use of the term “vegetation management area” in place of the previously used term “buffer”, which may confuse the reader as it is different than a critical area buffer. Other minor changes are suggested for clarity and readability. |</p>
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOPOLY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>O  17.40.020 (4) and (5) Pages 89/90</td>
<td>Development Standards for Ecological Functions</td>
<td>4. Vegetation requirements for buffers/vegetation management areas: Buffers/vegetation management areas required in items 17.40.020 (2) and 3. above shall consist of be vegetated with native species typical to riparian areas, or a functional equivalent. There are several intents to this provision which include: A. To promote no net loss of ecological functions as further urbanization or more intensive use of individual sites occur. B. To improve maintain the health and value of the shoreline, as well as individual properties, when new development takes place by restoring maintaining buffer areas that can help mitigate existing impacts and result in healthy incremental restoration of riparian areas over the long term. C. To implement requirements that are flexible to meet individual needs (provide a toolbox of options accomplishing the intended objectives) and are proportionate to planned improvements. See Section 17.41.021, Table 1, for vegetation guidelines for buffer vegetation management areas. 5. Ecological functions: All projects shall satisfy the intent of goals applicable to ecological functions in Section 17.44 and 17.45.</td>
<td>These changes are suggested to reflect conversations with the City surrounding consistent use of the term “vegetation management area” in place of the previously used term “buffer”, which may confuse the reader as it is different than a critical area buffer. Other minor changes are suggested for clarity and readability, for internal document and section consistency, and to clearly differentiate between the terms and concepts of mitigation versus restoration as required under this SMP. The deletion of #5 is recommended because it exactly duplicates 17.40.020 (1) (A).</td>
<td></td>
</tr>
<tr>
<td>P  17.40.020 (6) Page 90</td>
<td>Development Standards for Ecological Functions</td>
<td>6. Uses designated for location within a buffer/vegetation management area must promote shoreline goals: Generally, structures and activities that do not promote shoreline goals as expressed in the SMA and this SMP are prohibited within the designated buffer/vegetation management and setback areas. Examples of uses that have damaging impacts and are prohibited within this buffer and setback, except as provided within this SMP include: A. New or expanded lawns and gardens (that are typically heavily fertilized, contaminate the water body through nutrient loading, are generally not efficient in filtering runoff or allowing water to infiltrate and provide little habitat value); B. New or expanded parking and stormwater facilities (that contribute significant contaminants);</td>
<td>These changes are suggested to reflect conversations with the City surrounding consistent use of the term “vegetation management area” in place of the previously used term “buffer”, which may confuse the reader as it is different than a critical area buffer. Other minor changes are suggested for clarity and readability, for internal document and section consistency, and towards reduction of the volume of the document through deletion of repetitive and unnecessary language that is not essential to convey concepts or standards in the SMP. Addition of the word “new or expanded” to provisions (6) (A) through (E) are suggested to clarify these standards are not retroactive.</td>
<td></td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline additions; strikethrough deletions]</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>C.</td>
<td>New or expanded fences (that degrade the natural look and aesthetics of shorelines and restrict movement of wildlife and people); and</td>
<td><strong>Vegetation Management</strong> Please see exhibit C-4.</td>
<td>Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section. It was not clear if some statements were intended to be policies or standards, and it was not clear when and for what activities a vegetation management plan would be required. In addition, some information in the section was not consistently referenced; for example, the information in Table 1 alternately referred to as a guideline, a benchmark and a standard. Suggested changes also include consistent use of the term “vegetation management area” in place of the previously used term “buffer”. Changes are also suggested that help clarify which standards apply to alteration or redevelopment of existing uses/structures only and not to new development. Many changes to Table 1 are suggested so that terms like threshold, requirement, improvement, etc. are used consistently and to clearly tie requirements to meet specific thresholds to other applicable sections of the SMP.</td>
<td></td>
</tr>
<tr>
<td>D.</td>
<td>New or expanded accessory structures (which can have a range of adverse impacts).</td>
<td></td>
<td>The recommended changes can generally be characterized as removal of repetitive or inaccurate language, combination of like policies and standards, consistent use of terms and clarity of requirements, procedures, and thresholds. Because of the scope of the recommended changes, Exhibit C-4 was created. This attachment illustrates all of the recommended changes to this section of the SMP in bill format. <strong>Please note there are required changes to this section as discussed in Attachment B [Department of Ecology Required Changes to the City of Lacey October 15, 2010 SMP].</strong> Exhibit C-4 to this document also reflects those required changes.</td>
<td></td>
</tr>
<tr>
<td>E.</td>
<td>New or expanded uses, structures, activities and modifications not otherwise permitted in this SMP, that can adversely impact shoreline functions and values not otherwise permitted in this SMP.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Restoration Goals and Policies**

1. **Goal:** Identify and take advantage of restoration opportunities where restoration goals can be integrated into the design and planning of public or private shoreline development projects.

   **Policy:** Recognize that restoration and enhancement may result from:  
   1) Mitigation of impacts from new development.  
   2) Adoption of shoreline setbacks and vegetation management areas with a protective buffer function, which are based upon shoreline ecological functions and processes.

   **Policy:** Reestablish, rehabilitate and/or otherwise improve impaired shoreline ecological functions and/or processes through voluntary and incentive-based public
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>and private programs and actions that are consistent with this master program and other approved restoration plans.</td>
<td></td>
</tr>
<tr>
<td>C.</td>
<td>Policy: Restore and enhance shoreline ecological functions and processes as well as shoreline features through voluntary and incentive-based public and private programs.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>D. Policy: Restoration should be carried out in accordance with an approved shoreline restoration vegetation management plan and in accordance with the policies and regulations of this SMP.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SS</td>
<td>17.42.000 (4) (7) Page 104 Restoration Goals and Policies Encourage the beneficial reuse of dredged materials for beach restoration and enhancement projects when it has suitable organic and physical properties.</td>
<td>This change is suggested so that the City’s SMP is using the same term as State and Federal agencies do, ‘beneficial reuse’ being the placement or use of dredged material for some productive purpose.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TT</td>
<td>17.43.000 Page 109 Document Organization For the reader’s convenience, this document has been organized with all of the uses, activities and modifications in alphabetical order. Each use, activity or modification has its own separate section. These sections are all alphabetized. Modifications are listed separately addressed in Table 5. In addition, a separate modifications section 17.45 has been developed that provides general goal and policy statements applying to all modifications. Additional A policies and development standards for various modifications are provided under separate sections that deal with each particular modification. These sections are integrated and organized into the alphabetized sections of uses and activities. The modifications Section 17.45 has a listing of the separate sections dealing with various each modification for easy referral between the two.</td>
<td>The recommended deletion in the first paragraph is suggested because the sentence duplicates information given in the previous sentence. Changes suggested to the second paragraph are recommended for clarity and readability.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>UU</td>
<td>17.44.000 Page 111-112 Goals and Policies Applicable to all Uses and Activities A. Policy: As part of development approvals, apply standards for proper maintenance and restoration of degraded shorelines. Where there are no regulatory opportunities, use incentives to encourage developers, property owners, community groups and others to enhance degraded shorelines and return them to an ecologically functioning condition.</td>
<td>The change to policy A and first change to policy C are recommended to clarify that proposals not qualifying as development as defined in the SMP, and that may be exempt from having to obtain a Shoreline Substantial Development Permit, still must comply with these policies. The second change to policy C and deletion of policy D are suggested to reduce duplication.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>C. Policy: Evaluate all shoreline uses and activities development applications for their effect on the aquatic environment to ensure every proposal that is approved achieves no net loss of ecological functions and values and does not adversely impact public health.</td>
<td>The first change to policy F is recommended to delete repetitive language by incorporating policy H into policy F. The second change is for clarity because activities requiring permits are not the only types of activities that are subject to the no net loss standard. The remaining changes are recommended to clarify that compliance with the mitigation sequence is necessary, not just compensatory mitigation, where impacts must occur and that avoidance is the first step in that sequence.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Recommended changes to policy reflect that not all activities occurring within shoreline jurisdiction will qualify as development under the definition of development in the SMP. It also reflects required changes in Attachment B-1 (the use of “shall” versus “should” in policies).

### ITEM SMP PROVISION 

<table>
<thead>
<tr>
<th>Item</th>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>VV</td>
<td>17.45.000 Page 113 Shoreline Modification Goals and Policies</td>
</tr>
<tr>
<td>WW</td>
<td>17.45.000 Page 113 Shoreline Modification Goals and Policies</td>
</tr>
<tr>
<td>XX</td>
<td>17.45.000 Page 114 Shoreline Modification Goals and Policies</td>
</tr>
</tbody>
</table>

#### BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]

- **Impact public health.**

**F. Policy:** Assess project-specific impacts, cumulative impacts, and a project’s potential to result in a net loss of ecological functions during permit review. Require compliance with the mitigation sequence and compensatory mitigation as necessary to mitigate unavoidable identified impacts. If impacts cannot be mitigated, the application for use, activity or modification may be denied.

**H. Policy:** Require mitigation of site specific development impacts to maintain existing ecological functions, also including cumulative impacts that cannot be anticipated, avoided or fully mitigated at the time of development.

**I. Policy:** Generally prohibit development which activities that would degrade existing levels of ecological function. Development shall always provide on site Mitigation of impacts should occur on site or provide enhancements to on other priority shoreline sites that offset on site impacts. Development shall Activities should always be consistent with state long term goals and requirements for protection and restoration of shoreline areas.

---

**Recommendations:**

- This change is recommended because the listed sections that follow the statement include goals and policies in addition to standards.

- This change is suggested for consistency; Section 17.30.020 and the definitions section of the SMP highlight the difference between stair towers and stairs, and stairs are permitted for pedestrian beach access in the setback and vegetation management area without a variance. Stair towers are prohibited.

- These changes are recommended for clarity, readability, and consistency with the wording and style used in other policy statements and sections of the SMP.
### ATTACHMENT C - DEPARTMENT OF ECOLOGY RECOMMENDED CHANGES TO THE CITY OF LACEY, OCTOBER 15, 2010 SMP - (RESOLUTION NO. 967)

<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>H.</td>
<td>Policy: Design, locate, and construct bank stabilization measures should be designed, located, and constructed only to prevent damage to existing development.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>J.</td>
<td>Policy: Prohibit the use of car bodies, demolition debris, concrete rubble, scrap building equipment or appliances should not be used for shoreline stabilization.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>K.</td>
<td>Policy: Generally prohibit the use of substantial stream channel direction modifications, and realignment and/or straightening as a means of shoreline stabilization and flood protection should be discouraged. Work within the natural shoreline processes and do not build avoid development within flood plains, floodways or other areas that require stabilization of the natural processes with infrastructure.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M.</td>
<td>Policy: Retain natural features serving a stabilization function such as snags, stumps or uprooted trees that support fish and wildlife and other aquatic systems and that are not a significant navigation hazard.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>O.</td>
<td>Policy: Require the use of beach restoration/enhancement using naturally regenerating systems for the prevention and control of beach erosion are preferred rather than bulkheads and other structures where:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### YY 17.45.010 Policies Applying to Shoreline Stabilization

| A.   | Policy: Locate and design shore stabilization should be located and designed to: |
|      | 3) Not intrude into or over critical saltwater or freshwater habitats. |
| B.   | Policy: Locate and design shoreline stabilization on streams should be located and designed to fit the physical character and hydraulic energy potential of a specific shoreline reach, which may differ substantially from adjacent reaches. |
| C.   | Policy: Locate and design public or quasi-public development shoreline stabilization projects should be located and designed for multiple use, restoration, and/or public access, where feasible. |
| E.   | Policy: Limit new or expanded structural shore stabilization should be limited to when: |
| G.   | Policy: Prohibit shore stabilization projects should not be allowed be prohibited on publicly owned shorelines which result in a long-term decrease in public use of the shoreline. |

These changes are recommended for clarity, readability, and consistency with the wording and style used in other policy statements and sections of the SMP. Changes are also recommended to avoid statements that indicate the City is the “doer” in the sentence. For example, statements like “Locate and design shoreline stabilization” are recommended to be changed to statements like “Shoreline stabilization should be located and designed...”

There are multiple sections of the SMP that are similarly worded: 17.46.000, 17.48.010, 17.49.010, 17.52.010, 17.53.010, 17.54.010, 17.61.010, 17.63.000, 17.65.010, 17.67.000, 17.68.000, 17.69.000 and 17.70.000.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Shoreline Stabilization Standards</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ZZ</td>
<td>17.45.015 (2) Page 117</td>
<td>New structural stabilization measures shall not be allowed except when necessity is demonstrated in the following manner:</td>
<td></td>
<td>These changes are suggested to remove duplicative and repetitive language.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>A. To protect existing primary structures:</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1) New or enlarged structural shoreline stabilization measures for an existing primary structure, including residences, shall not be allowed unless there is conclusive evidence documented by a geotechnical analysis that the structure is in danger from shoreline erosion caused by tidal action, currents, or waves. Normal sloughing, erosion of steep bluffs, or shoreline erosion itself, without a scientific or geotechnical analysis, is not demonstration of need. The geotechnical analysis shall evaluate on-site drainage issues and address drainage problems away from the shoreline edge before considering structural shoreline stabilization.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2) The erosion control structure will not result in a net loss of shoreline ecological functions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3) The erosion is not being caused by upland conditions, such as the loss of vegetation and drainage.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I. Policy: Prohibit Structural shoreline stabilization to should not be located on or at the base of eroding bluffs, except where existing structures are threatened or non-structural methods have been determined to be infeasible.

J. Policy: Give preference in permitting to Encourage shore stabilization efforts which coordinate affected property owners and public agencies for a whole drift sector (net shore-drift cell) to address ecological and geo-hydraulic processes, sediment conveyance and beach management issues. Encourage the creation of a comprehensive management program where beach erosion threatens existing development.

K. Policy: Encourage & removal of failing, harmful, unnecessary, or ineffective structures and restore shoreline processes and ecological functions by using less harmful more natural long-term stabilization measures.

L. Policy: Prioritize Shoreline stabilization projects should be prioritized in based upon the following order. of preference, Applications that propose less preferred methods must should demonstrate why preferred methods are not feasible will not work.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAA</td>
<td>17.45.015 (3) Page 117</td>
<td>Shoreline Stabilization Standards</td>
<td>An existing shoreline stabilization structure may be replaced with a similar structure if there is a demonstrated need to protect principal uses or structures from erosion caused by currents, tidal action, or waves and provided there is no other more ecologically sound practice that can serve the same purpose.</td>
<td>This change is recommended for clarity and to avoid inadvertent misunderstanding of the term “function” as it is commonly used in the SMP (ecological function).</td>
</tr>
<tr>
<td>BBB</td>
<td>17.45.015 (6) and (7) Page 118-119</td>
<td>Shoreline Stabilization Standards</td>
<td>For erosion or mass wasting due to upland conditions, see WAC 173-26-221(3)(c)(ii) Geologically Hazardous Areas. Development in designated geologically hazardous areas shall be regulated in accordance with the following:</td>
<td>This deletion is suggested because the portion of the Guidelines language used within it represents direction to the local government on how to regulate geologically hazard areas in SMPs; the language was not intended to be a standard. In addition, the language is repetitive of other sections of the SMP. All of these standards exist in other chapters.</td>
</tr>
</tbody>
</table>

4) Nonstructural measures, such as placing the development further from the shoreline, planting vegetation, or installing on-site drainage improvements, are not feasible or not sufficient.

5) The need to protect primary structures from damage due to erosion is demonstrated through a geotechnical report. The damage must be caused by natural processes, such as tidal action, currents, and waves.

6) The erosion control structure will not result in a net loss of shoreline ecological functions.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOCY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCC</td>
<td>17.46.000 through 17.46.025 Pages 121-130</td>
<td>Public Access</td>
<td>Please see exhibit C-5.</td>
<td>Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section and to reduce the volume of the section by combining like policies or standards into more concise statements. Other changes are suggested for consistency with other sections of the document. Where possible, the recommended changes also refer to other codes or documents the City is loosely referencing in the SMP instead of repeating relevant information in the SMP. This is intended to reduce the volume of the document and to avoid inconsistencies or conflicts where language inserted into the SMP does not represent an exact copy of the language in the other codes or documents. Finally, a few of the changes as highlighted by comments on exhibit C-5 are suggested to clarify the City will evaluate the nexus and proportionality of public access requirements on a project by project basis. Because of the scope of the recommended changes, Exhibit C-5 was created. This attachment illustrates all of the recommended changes to this section of the SMP in bill format. Please note there are required changes to this section as discussed in Attachment B (Department of Ecology Required Changes to the City of Lacey October 15, 2010 SMP). Exhibit C-5 to this document also reflects and notes the location of those required changes.</td>
</tr>
<tr>
<td>DDD</td>
<td>17.47.020 Page 133</td>
<td>Aquaculture Standards</td>
<td>4. Commercial shellfish activity shall meet requirements of Section 17.35.031 through 17.35.033 and shall demonstrate no net loss of function and value with emphasis on impacts to the adjacent natural designation with other critical and sensitive habitat.</td>
<td>This change is suggested to refer to all applicable provisions in other land use regulations the City is incorporating by reference into the SMP.</td>
</tr>
<tr>
<td>EEE</td>
<td>17.48.000 Page 135</td>
<td>Bioeng. Goals</td>
<td>See General Goals, and Policies and Standards under Modifications, Section 17.43.</td>
<td>These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to “modifications” refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>FFF</td>
<td>17.48.010 (3) Page 135</td>
<td>Bioeng. Policies</td>
<td>D. Include vegetation buffer, fencing and/or other measures to avoid disturbance of the project site by livestock and vehicles.</td>
<td>This change is suggested to avoid the use of the term “buffer” in order to avoid confusion with critical area buffers or that additional buffer areas may be required.</td>
</tr>
<tr>
<td>GGG</td>
<td>17.48.020 (3)(C) Page 135</td>
<td>Bioeng. Development Standards</td>
<td>C. An undisturbed buffer Vegetation shall be incorporated into the site design vegetation management area to allow bank protection plantings to become established within a minimum of three years. The vegetation management area buffer shall exclude livestock, vehicles and activities that could further disturb the site.</td>
<td>The suggested change includes consistent use of the term “vegetation management area” in place of the previously used term “buffer” and for clarity regarding vegetation establishment timeframes.</td>
</tr>
<tr>
<td>HHH</td>
<td>17.49.000 Page 137</td>
<td>Boating Facilities</td>
<td>1. Goal: Provide opportunity to meet demonstrated public need and demand for boating facilities for shoreline areas consistent with the City Comprehensive Plan for Outdoor Recreation, City Public Access Plan, shoreline designations and the overall emphasis on protection of shoreline natural functions and values. 2. Goal: Integrate planning for boating services with the City’s Comprehensive Plan for Outdoor Recreation and the Shoreline Public Access Plan.</td>
<td>The changes to #1 are suggested for readability and to clarify that the goal applies to all boating facilities, not just boat launches. #2 is suggested for deletion because it is repetitive of the information in #1.</td>
</tr>
<tr>
<td>III</td>
<td>17.49.000 through 17.49.021</td>
<td>Boating Facilities</td>
<td>Please see exhibit C-6.</td>
<td>Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section and to reduce inadvertent conflicts with other sections of the SMP. A good portion of the discussion in this section relates to the existing Beachcrest marina, most of which is not located within the City’s jurisdiction.</td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOLoGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>JJJ</td>
<td>Pages 137-140</td>
<td>Breakwaters, Jetties, Groins and Weirs</td>
<td>See General Goals, and Policies and Standards under Modifications, Section 17.45.</td>
<td>Although the City has outlined that it intends to work with the County on an interlocal permitting agreement. Extensive discussions about the facility and the surrounding land uses are included in the inventory and characterization and do not need to be repeated here. The recommended changes can be generally characterized as clarification. Because of the scope of the recommended changes, Exhibit C-6 was created. This attachment illustrates all of the recommended changes to this section of the SMP in bill format. <strong>Please note there is one required change to this section as discussed in Attachment B (Department of Ecology Required Changes to the City of Lacey October 15, 2010 SMP).</strong> Exhibit C-6 to this document also reflects that required change.</td>
</tr>
<tr>
<td>KKK</td>
<td>17.50.000 Page 141</td>
<td>Bulkheads</td>
<td>See General Goals, and Policies and Standards under Modifications, Section 17.45.</td>
<td>These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to &quot;modifications&quot; refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>LLL</td>
<td>17.51.010 Page 143</td>
<td>Bulkhead Policies 3. Policy: Where new bulkheads are necessary, applications should <strong>require</strong> that applications for new single-family residence bulkheads be processed as a shoreline conditional use permit to. Approval of new bulkheads should be rare because new residential development and structures need to be designed so they do not need protection from shoreline processes (Section 17.63., Residential Development Goal 1, Policy D, and Section 17.51.010 Bulkheads, Goal 1, Policy 2, above). In addition, stabilization of beach area can generally be accomplished with naturalized alternatives to bulkheads that are much more ecologically friendly, more attractive, provide more usable beach front and have advantages considering natural shoreline functions, habitat, drainage treatment and water quality. 4. Policy: Generally, when replacement of an existing bulkhead is necessary, emphasis should be placed on developing alternative naturalized concepts [soft stabilization] for meeting objectives and bulkheads should be removed or abandoned in favor of more naturalized strategies, &quot;bioengineering&quot;; see Section 17.30.047.</td>
<td>The changes to policies 3 and 4 are suggested for clarity and readability, towards reduction of the volume of the document through deletion of repetitive and unnecessary language, and to clarify these provisions apply not only to residential structures.</td>
<td></td>
</tr>
<tr>
<td>MMM</td>
<td>17.51.020 Page 143-144</td>
<td>Bulkhead Development Standards 3. Bulkheads shall be subject to mitigation sequencing outlined in Section 17.40.015. When allowed, mitigation shall be required for all adverse impacts to assure no net loss of shoreline ecological functions. 4. A bulkhead may be allowed to protect an existing single-family residence or to maintain access to an authorized shoreline use after the Administrator has determined, based on a geotechnical analysis, that other techniques such as beach restoration and enhancement or bioengineering are not feasible [see also Section 17.45.015].</td>
<td>The changes to policies 3 and 4 are suggested for clarity and readability, towards reduction of the volume of the document through deletion of repetitive and unnecessary language, and to clarify these provisions apply not only to residential structures. Combination of policies 5 and 9 are suggested for the same reasons.</td>
<td></td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>5</td>
<td>A bulkhead is prohibited. Bulkheads are prohibited on shores where valuable geohydraulic-hydraulic or biological processes are sensitive to interference and critical to shoreline conservation, such as feeder bluffs, marshes, accretion shoreforms such as spits, hooks, bars or barrier beaches, on estuarine shores, in wetlands, on point and channel bars, and in salmon and trout spawning areas, except for the purpose of fish or wildlife habitat enhancement or restoration.</td>
<td><strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to “modifications” refers to Section 17.45 of this SMP.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NNN</td>
<td>17.52.000&lt;br&gt;Page 145</td>
<td>Bouys</td>
<td>See General Goals, and Policies and Standards under Modifications, Section 17.45.</td>
<td><strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to “modifications” refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>OOO</td>
<td>17.52.020&lt;br&gt;Page 145</td>
<td>Buoy Development Standards</td>
<td>3. New mooring buoys shall not be located farther waterward than existing mooring buoys or established swimming areas on an adjacent lot, and shall not significantly interfere with use of waters for navigation.</td>
<td><strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;This change is suggested to clarify which buoys (or buoys located where) can be used to calculate this location.</td>
</tr>
<tr>
<td>PPP</td>
<td>17.53.000&lt;br&gt;Page 147</td>
<td>Dredging</td>
<td>See General Goals, and Policies and Standards under Modifications, Section 17.45.</td>
<td><strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to “modifications” refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>QQQ</td>
<td>17.53.010 (9)&lt;br&gt;Page 147</td>
<td>Dredging Policies</td>
<td><strong>Policy:</strong> Allowed Dredging for the should be limited to the following activities through a conditional use permit:&lt;br&gt;1. All applications for permits which include dredging shall include supply a dredging plan which includes the following information:&lt;br&gt;A. A description of the applicable purpose of the proposed dredging and an analysis of compliance with the policies and regulations of this master program.&lt;br&gt;D. A description of the method of by which materials will be removed, including facilities to address for settlement and movement.&lt;br&gt;1) Dredging procedure: length of time it will take to complete dredging, method of dredging and amount of materials removed.&lt;br&gt;2) Frequency and quantity of project maintenance dredging.&lt;br&gt;2. Toxic dredge spoil deposits on land shall not be placed on sites from which toxic leachates could reach shorelines and/or associated wetlands.</td>
<td><strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;This change is recommended for clarification. This policy is followed by a list of activities. Inclusion of a list of activities in the policy suggests that dredging should only be authorized for those listed activities. Table 5 lists dredging for all activities as a conditional use, so this policy is more specific than Table 5. This change clarifies that preference will be given to dredging for these activities over unspecified activities, although all dredging activities will be reviewed through the CLIP process. <strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;The changes to #1 and its supporting standards are recommended for clarity and readability and to remove unnecessary language. <strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;The change to #2 is recommended to clarify that toxic spoils placed anywhere should not be allowed to reach shorelines or wetlands. <strong>ECOLOGY - DISCUSSION/RATIONAL</strong>&lt;br&gt;The change to #9 is recommended to clearly indicate these are standards, not policies, and that the action is a mandate or is required.</td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>SSS</td>
<td>17.54.000</td>
<td>Fill</td>
<td>17.54.000 <strong>Grading and Fill - Goals</strong></td>
<td>Upland grading is not addressed in the SMP. This change is recommended to ensure upland grading is recognized and addressed in the SMP. See also U above.</td>
</tr>
<tr>
<td></td>
<td>Page 151</td>
<td></td>
<td>See General Goals, <strong>and Policies and Standards</strong> under Modifications, Section 17.45.</td>
<td>The second change is recommended to clarify that there are also applicable standards in the Modification section, and that the reference to “modifications” refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>TTT</td>
<td>17.54.010</td>
<td>Fill Policies</td>
<td>17.54.010 <strong>Grading and Fill - Policies</strong></td>
<td>Upland grading is not addressed in the SMP. This change is recommended to ensure upland grading is recognized and addressed in the SMP. See also T above.</td>
</tr>
<tr>
<td></td>
<td>Page 151</td>
<td></td>
<td></td>
<td>The change to #3 is recommended for clarity, readability and accuracy.</td>
</tr>
<tr>
<td>UUU</td>
<td>17.54.010</td>
<td>Fill Policies</td>
<td>3. <strong>Policy:</strong> Design and locate shoreline fills to avoid loss of ecological values or natural resources, <strong>or and to</strong> avoid creating a risk of significant injury to life, or adjacent property.</td>
<td>The deletion of #5 is recommended because it repeats policy #7 which supports allowance of fill only when necessary to support water dependent uses.</td>
</tr>
<tr>
<td></td>
<td>Page 151</td>
<td></td>
<td>5. <strong>Policy:</strong> Prioritize fills for water dependent uses</td>
<td>The deletion of #8 is recommended because it represents an administrative procedure of the City, not an SMP policy. The information is also presented in other places in the document, so is repetitive.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>8. <strong>Policy:</strong> Require a shoreline conditional use permit for any fill placed waterward of the OHWM for any use except ecological restoration.</td>
<td></td>
</tr>
<tr>
<td>VVV</td>
<td>17.54.020</td>
<td>Fill Development Standards</td>
<td>17.54.020 <strong>Grading and Fill - Development Standards</strong></td>
<td>Upland grading is not addressed in the SMP. This change is recommended to ensure upland grading is recognized and addressed in the SMP. See also T above.</td>
</tr>
<tr>
<td></td>
<td>Page 152</td>
<td></td>
<td>10. Fill within a <strong>floodway and the 100-year floodplains are</strong> prohibited.</td>
<td>The combination of #10 and #11 is suggested to reduce duplicity and the volume of the document.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>11. Fill within a floodway is prohibited.</td>
<td></td>
</tr>
<tr>
<td>WWW</td>
<td>17.54.020 (14)</td>
<td>Fill Development Standards</td>
<td>14. <strong>Fill disposal sites shall adhere to the following conditions:</strong></td>
<td>It is suggested that this standard and its supporting standards be stricken because the language appears to have come from standards relating to dredge disposal, not fill, and their applicability and appropriateness in regard to fill activities is not clear.</td>
</tr>
<tr>
<td></td>
<td>Page 152</td>
<td></td>
<td>A. <strong>Containment dikes and adequate settling basins shall be built and maintained so that the site’s discharge water carries a minimum of suspended sediment.</strong> Required basins shall be designed to maintain at least 1 foot of standing water at all times to encourage proper settling.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>B. <strong>Proper diversion of surface discharge shall be provided to maintain the integrity of the natural streams, wetlands and drainages.</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>C. <strong>Shoreline ecological functions and processes will be preserved, including protection of surface and ground water, erosion, sedimentation, floodwaters or runoff will not increase adverse impacts to shoreline ecological functions and processes or property.</strong></td>
<td></td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOCY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>------------------------------------------------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>D. Runoff water shall be controlled so as to enter a waterway through grassy swales or other treatment features that assures protection of water quality and other environmental resources.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>E. Underground springs and aquifers shall be identified and protected.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>F. The outside face of dikes shall be sloped at 1 1/2 to 1 (horizontal to vertical) or flatter and seeded with grass and/or native vegetation. Landscaping and buffer areas may be required.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>G. Sites shall be adequately screened from view. Dredge disposal in shoreline areas shall not impair scenic views.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>H. Dredge materials deposited upland and not part of a permitted dike or levee shall constitute fill, and when deposited within the jurisdiction of this master program, shall comply with the fill regulations of this master program.</td>
<td></td>
</tr>
<tr>
<td>XXX</td>
<td>17.55.000</td>
<td>Floats</td>
<td>See General Goals, and Policies and Standards under Modifications, Section 17.45.</td>
<td>These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to “modifications” refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>YYY</td>
<td>17.55.020</td>
<td>Floats - Development Standards</td>
<td>E. Recreational float width shall comply with the following standards: 1) Floats with a width of six (6) feet or less shall incorporate a minimum of thirty percent (30%) functional grating into float dock surface area. 2) Floats with a width greater than six (6) feet that does not exceed eight (8) feet in width shall incorporate a minimum of fifty percent (50%) functional grating into the float dock surface area. 3) Recreational floats shall be anchored utilizing either helical screw or “duckbill” anchor; anchor lines shall not rest on or disturb the substrate.</td>
<td>These changes are recommended for clarity, consistency, and to resolve cut and paste errors.</td>
</tr>
<tr>
<td>ZZZ</td>
<td>17.56.000 and .010</td>
<td>Forestry/ Mining Policies and Standards</td>
<td>2. <strong>Goal:</strong> Achieve protection of forest resources from harvesting within shoreline jurisdiction areas. A. <strong>Policy:</strong> There are many benefits of urban forest tree resources as discussed in Lacey’s Urban Forest Management Plan. These benefits include habitat, helping stabilize surface water runoff and drainage and promoting other natural functions and values. Tree resources should be protected from harvesting in these areas.</td>
<td>These changes are suggested for clarity and readability, for internal document and section consistency, and towards reduction of the volume of the document through deletion of repetitive and unnecessary language not essential to convey concepts or standards in the SMP.</td>
</tr>
</tbody>
</table>

Policy: Resource areas for forestry and mining activities are designated in appropriate areas outside the UGA and outside critical areas and shoreline areas. Forestry and mining
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOTOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAAA</td>
<td>17.57.020 (5)</td>
<td>Historical and Arch. Development Standards</td>
<td>5. Where the protection of a historic or archaeological site is a concern to the administrator of the City's Certificate Local Government Program, a shoreline conditional use permit shall be required for any use or development of single-family residences.</td>
<td>This change is suggested to clarify that any use or development, not just single family residential development, should be of concern in areas with historic or archaeological sites.</td>
</tr>
<tr>
<td>BBBB</td>
<td>17.58.000 (1)</td>
<td>Instream Structures</td>
<td>See General Goals and Policies and Standards under Modifications, Section 17.45.</td>
<td>These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to &quot;modifications&quot; refers to Section 17.45 of this SMP.</td>
</tr>
<tr>
<td>CCCC</td>
<td>17.58.000 (2)</td>
<td>Instream Structures</td>
<td>2. Goal: Achieve urbanized areas where land use is planned so the layout and design of development respects natural systems and processes and artificial facilities like instream structures, dikes and levees are not necessary.</td>
<td>It is recommended that this goal and its associated policies be stricken. The same language exists elsewhere in the document. The intent of policy B under #2 is achieved in policies under #3 (see below). Policy A should be brought into #3 and the rest of this section should be deleted to reduce unnecessary document volume.</td>
</tr>
<tr>
<td>DDDD</td>
<td>17.58.000 (3)</td>
<td>Instream Structures</td>
<td>3. Goal: Protect and preserve natural systems and functional values while providing some limited flexibility to intervene with improvements to natural systems where necessary to protect the public’s health and safety.</td>
<td>Please see also Exhibit B-1 for required changes affecting this section, which are reflected here. The deletion of Policy A is suggested because it is duplicative; all of the same information is covered in Policy B. The changes to Policy B are suggested to incorporate required changes in Exhibit B-1 (shall to should), incorporate deleted Policy A in CCCC above, and for clarity, accuracy and readability.</td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES</td>
<td>ECOCY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------</td>
<td>----------------------------</td>
</tr>
<tr>
<td>EEEE</td>
<td>17.58.020 and 0.025</td>
<td>Instream Structure Development Standards</td>
<td>17.58.025 - Instream Structures - Development Standards</td>
<td>These changes are suggested to delete repetitious statements, to combine like standards, and for readability, accuracy, and clarity. 17.58.025 (1) -old- is recommended for deletion because by definition, instream structures are not related solely to flood control works or flood management. 17.58.025(4) -old- is recommended for deletion because it is the same as 17.58.020 (1). The numbering scheme would change because these standards would be absorbed into Section 17.28.020.</td>
</tr>
<tr>
<td>FFFF</td>
<td>17.60.000 (1)</td>
<td>Parking Goals and Policies</td>
<td>D. Policy: Encourage availability of alternative forms of transportation for uses located within shorelines jurisdiction to reduce impacts from automobile infrastructure and use. Encourage design emphasis in walking and biking consistent with the Comprehensive Land Use Plan's emphasis on pedestrian friendly design for the City’s residential neighborhood areas.</td>
<td>These changes are suggested for clarity and readability and towards reduction of the volume of the document through deletion of repetitive and unnecessary language.</td>
</tr>
<tr>
<td>GGGG</td>
<td>17.60.000 (2)</td>
<td>Parking Goals and Policies</td>
<td>2. Goal: Accommodate automobile use necessary to provide for allowed activities located in the shoreline jurisdiction and mitigate all identified impact to the shoreline area and adjacent neighborhoods associated with its use.</td>
<td>These changes are suggested to delete repetitious statements, to combine like policies, and for readability, accuracy, and clarity. 17.60.000 Goal (2) is recommended for deletion because it repeats Goal #1 of the same section. Policy 2 (A) is recommended for deletion because it repeats Goal 1 (A). The numbering scheme would change because these policies would be吸收 into Section 17.60.000 (1).</td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>C.</td>
<td>Policy: Allow parking within the shoreline jurisdiction only for an approved authorized use.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D.</td>
<td>Policy: Design and construct parking facilities to minimize off-site light and glare by using fully shielded and properly aimed fixtures to provide appropriate lighting levels. If night time use of access points is anticipated, design access to prevent headlights from impacting adjacent homes and orient pedestrian security lighting to pedestrian corridors and shield it away from adjacent properties.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E.</td>
<td>Policy: Locate parking facilities as far landward of the ordinary high water mark as possible and recreational beaches, and out of required setback/buffer areas. Where possible, parking and road infrastructure should be located outside shoreline jurisdiction in an upland area and well buffered from adjacent residential neighborhoods.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>F.</td>
<td>Policy: Link parking facilities with the shoreline and to the uses they serve with walkways.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HHH</td>
<td>17.60.020 Page 168 Parking Development Standards</td>
<td>2. Parking facilities shall be located landward of the principal building or use and outside of the shoreline setback and vegetation management/buffer area, except when the parking facility is within or beneath a structure and adequately screened, or in cases when an alternate orientation would have less adverse impact on the shoreline, as determined by the Administrator.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5. Parking facilities shall provide safe and convenient pedestrian circulation within the parking area and to the shoreline or use.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>6. Parking associated with launch ramps and other shoreline access shall satisfy requirements of Table 4, section 17.24.015.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>7. Refer to Section 17.70.010 for the water quality development standards which includes on-site stormwater control measures. Also refer to Sections 17.40 (Shoreline Ecological Function) and 17.41 (Vegetation Management).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>8. Additional parking regulations can be found in Parking facilities shall be designed and constructed in accordance with Chapter 16.72 (zoning chapter) of the Lacey Municipal Code.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>III</td>
<td>17.61.020 Page 170 Pier and Dock Development Standards</td>
<td>4. If the City has performed a needs analysis associated with its Comprehensive Plan for Outdoor Recreation or Public Access Plan, and it determines a pier or dock is necessary and consistent with this Program, applicable state guidelines, it shall serve as the necessary justification for pier or dock design, size, and construction. The intent of this provision is to allow the City the flexibility necessary to provide for existing and</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Changes to these standards are suggested for consistent use of the term “vegetation management area” in place of the previously used term “buffer”, for clarity, accuracy, to reduce repetitiveness, and for completeness.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The change to #4 is suggested to refer to the City’s SMP rather than the WAC. This does not change the intent of the provision.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOLOGY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>future public recreational opportunities associated with the use of piers and docks.</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Piers and docks, including those accessory to single-family residences, shall be designed and constructed to avoid or, if that is not possible, to minimize and mitigate the impacts to ecological functions, critical areas resources such as eelgrass beds and fish habitats and processes such as currents and littoral drift. For application in Lacey's critical salt water habitat and marine riparian habitat areas. See discussion, goals, policies and standards in Sections 17.35.030 through 17.35.035.</td>
<td>The change to #6 is suggested to refer to all applicable provisions in other land use regulations the City is incorporating by reference into the SMP.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>Piers and docks shall follow [underline-adhere to] the Green Shoreline Guidelines [underline-concepts] in Appendix 2 and construct such structures of materials that have been approved by applicable state agencies. The change to #7 is suggested to clarify that there are no specific standards, only guidelines/concepts, in Appendix 2 with regard to docks.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td>Because of the potential impact to the environment, new piers and docks in the marine environment shall only be permitted when it is identified as a public need in Lacey's Comprehensive Plan for Outdoor Recreation, they will be [underline-and] [underline-when] owned and maintained by the City of Lacey. [underline-And] [underline-a] [underline-net] loss of function and value of shoreline resources can [underline-shall] be demonstrated. The change to #8 is suggested for readability, clarity, to remove duplicative statements, and to ensure application of the statement as a requirement (“shall”).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12.</td>
<td>Shared moorage proposed for lease to upland property owners shall be reviewed as a marina and shall be subject to requirements for marinas as identified in this SMP. This provision does not apply when the upland property owners share a shoreline open space area with shoreline property owners and shared moorage facilities are provided as outlined in Section 17.55.020 (1). This addition is recommended to avoid potential conflict between this provision and the provision for shared moorage in Section 17.55.020 (1).</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

JJJJ  17.62.000 (1) Page 173 Recreation Goals and Policies  B. Policy: Link shoreline parks and public access points through open spaces, public land, designated sensitive and resource areas and other areas that are pedestrian and neighborhood focus points that can promote pedestrian linkage. Such areas linkage can include hiking paths, public parks, designated tree tracts, open space in plats, sensitive areas and buffers, bicycle paths, and scenic drives/walks located close to the water’s edge. Changes to these policies are suggested for clarity, readability, and to reduce duplication.  
D. Policy: Comply with all applicable city, county, state, and federal regulations.  

KKKK  17.62.000 (2) Page 173 Recreation Goals and Policies  2. Goal: Provide public access and recreation opportunities within shoreline areas appropriate for the use as identified within the City Comprehensive Plan for Outdoor Recreation, [underline-and] Shorelines Public Access Plan, [underline-and] Shoreline Environment Designation. These changes are suggested for clarity, readability and consistency and towards reduction of the volume of the document through deletion of repetitive and unnecessary language.  
B. Policy: Plan public access to recreational locations such as fishing streams and hunting areas to prevent concentration of use pressures and avoid use conflicts.  
D. Policy: Locate parking areas for recreation inland, away from the water.  

<table>
<thead>
<tr>
<th>Item</th>
<th>SMP Provision</th>
<th>Topic</th>
<th>Bill Format Changes</th>
<th>Ecology - Discussion/Rational</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>17.62.030</td>
<td>Page 174, Recreation Development Standards</td>
<td></td>
<td>Changes to these standards are suggested for clarity, accuracy, to reduce repetitiveness, and for completeness.</td>
</tr>
</tbody>
</table>

**Recruitment of the immediate edge of the water and recreational beaches. Link the parking to the shoreline by walkways. See Section 17.60.020.**

**H. Policy:** Design of public access points should consider the context of the neighborhood in which it is located and the expected parking demand. During this consideration, the context of the area and the impact of parking and promoting more automobile trips to the site should be weighed with alternative public transportation opportunities including walking and bikes. Large public recreation sites for active use should have upland parking to accommodate the recreation use. However, smaller access or observation points associated with a walking trail may not require any parking.

**I. Policy:** Given the desired pedestrian emphasis for most neighborhood areas, reduced or limited parking may be a strategy to limit automobile use and maintain existing neighborhood character. This may be a viable alternative for access points expected to be of more local use for the surrounding neighborhood area. If limiting parking is incorporated in the design, as a tool to contain automobile and parking impacts, the site will need closely monitored to assess impact of visitor parking on adjacent residential streets.

Changes to these standards are suggested for clarity, accuracy, to reduce repetitiveness, and for completeness.
### Item 1: Residential Development

**SMP Provision:** 17.63.000 through 17.63.045 Pages 175-186

**Topic:** Please see exhibit C-7.

**Bill Format Changes:**

*Standards.*

Refer to Section 17.70.010 for the water quality development standards which includes on-site stormwater control measures. Also refer to Sections 17.40 (Shoreline Ecological Function) and 17.41 (Vegetation Management).

**Ecology - Discussion/Rational:**

Ecology is recommending a number of changes to this section of the SMP. Most are to improve the readability and clarity of the section, to delete repetitive information and to reduce the volume of the section. References to the mitigation sequence are made more specific, and clarification of the shoreline access incentive dedication agreement program (clarifying that the density bonus will be transferred to lands outside of shoreline jurisdiction) is provided. Other changes include minor revisions to clarify that the provisions in this Section apply to all residential development. The chapter was written with the understanding that most residential development will occur in the shoreline residential designation, but needs to be clear that residential development is permitted in other shoreline environments; this section of the SMP needs to reflect that.

Other suggested changes move applicable bulk and dimensional standards into Table 4, and delete information more appropriately left to the City to administer through the zoning code by referencing those zoning provisions instead of attempting to repeat them all in the SMP (design review standards and residential landscaping standards, for example).

Because of the scope of the recommended changes, Exhibit C-7 was created. This attachment illustrates all of the recommended changes to this section of the SMP in bill format.

### Item 2: Revetments and Gabions - Goals

**SMP Provision:** 17.65.000 Page 189

**Topic:** See General Goals, and Policies and Standards under Modifications, Section 17.45.

**Bill Format Changes:**

These changes are recommended to clarify that there are also applicable standards in the Modification section, and that the reference to "modifications" refers to Section 17.45 of this SMP.

### Item 3: Signage - Goals and Policies

**SMP Provision:** 17.67.000 (1) Page 193

**Topic:** C. Policy: Only permit authorize signs consistent with the residential and public use of shorelines. Signs will generally be limited to municipal traffic, municipal pedestrian circulation, and small private signage providing circulation, location and use information to the public necessary for the use and enjoyment of shoreline facilities/area.

**Bill Format Changes:**

This change is recommended to clarify that signs not requiring a permit will still require authorization and compliance with the Master Program provisions.

### Item 4: Transportation Goals and Policies

**SMP Provision:** 17.68.000 Page 195

**Topic:**

1. **Goal:** Integrate the Lacey Transportation Plan into transportation planning for the land's resources under shorelines jurisdiction.

2. **Goal:** Achieve more naturalized Protect shoreline resources areas by keeping road infrastructure out of shoreline areas whenever possible.

**Bill Format Changes:**

The changes to Goal #1 are recommended for clarity and readability.

The changes to Goal #2 and policy B are suggested for readability, clarity and consistency. In addition, the second part of Policy B is more accurately related to Goal #3 and is addressed through policies related to that goal.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
</table>
| 3.   | 17.68.020     | 3. Goal: Ensure impacts are mitigated when there is no feasible alternative to locating a needed road transportation infrastructure in shoreline jurisdiction areas mitigate impacts to the maximum extent practical.  
   A. Policy: Use mitigation sequencing per Section 17.40.015 to locate new transportation corridors and facilities within shoreline jurisdiction areas.  
   B. Policy: Design, construct and maintain roads, shared use paths, and railroads should be designed, constructed and maintained to minimize erosion and to permit natural movement of ground water and flood waters.  
   C. Policy: Piers and bridges are preferred to the placement of fill within the shoreline jurisdiction for the roads, shared use paths, and railroad crossings.  
   D. Policy: Dispose of construction debris, overburden, and other waste materials should be disposed of in such a way as to prevent their entry into any surface water body by erosion from runoff drainage, high water, or other means into any surface water body.  
   The changes to Goal #3 and its supporting policies are suggested for readability, clarity and consistency. |
| QQ Q | 17.68.020     | 2. Future community transportation facilities and corridors within shoreline jurisdiction areas shall be prohibited unless shown/included on the City’s Comprehensive Land Use Plan—Transportation Plan Maps/Figures.  
   3. The placement of fill for roads, shared use paths, or railroads within shoreline jurisdiction shall be restricted to the smallest possible footprint for the intended purpose.  
   34. Bridges for roads, shared use paths, and railroads may be located within salmon and steelhead habitat provided that the following conditions are met:  
   A. An alternative alignment is not feasible,  
   B. The project is located and designed to minimize its impacts on the environment,  
   AC. Any adverse impacts are the mitigation sequence is followed,  
   BD. Open-piling and piers required to construct the bridge may only be placed waterward of the ordinary high water mark, if no alternative method is feasible.  
   The changes to standard #2 are suggested for readability, clarity and consistency. The City’s 1998 Transportation Plan (an element of the City’s Comprehensive Plan) appears to include maps and figures that illustrate future transportation facilities and corridors.  
   The deletion of standard #3 is suggested because this standard is essentially a step in the mitigation sequence (minimization) and can be incorporated into standard 5 (old; new #4) for the sake of brevity.  
   The deletion of standards A-C below #4 (old; new #3) are suggested because they can be combined into one concise statement.  
   The changes to standard #5 (old; new #4) are suggested for clarity, brevity, consistency with the rest of the master program, and to delete statements that occur in other portions of the document and on Tables 3 and 5. |
|------|---------------|-------|-------------------------------------------------|--------------------------------|
| RRRR | 17.69.000 (1) Page 197 Utilities Goals and Policies | 1. Goal: Provide opportunity for power to utilities serving shoreline areas while respecting the special function needs of these resource areas and maintaining their natural beauty. | The first change is recommended because power is not the only utility to which the policies that follow this goal speak or apply to. The second change is suggested for readability, accuracy and clarity. |}

| SSSS | 17.69.000 (2) Page 197 Utilities Goals and Policies | 2. Goal: Provide for the utility needs of permitted authorized uses within the shoreline jurisdiction while minimizing impacts to the environment and to the values and functions of the shoreline resource. | This change is recommended to clarify that utility activities not requiring a permit will still require authorization and compliance with the Master Program provisions. |}

<p>| TTTT | 17.69.020 Pages 197-198 Utilities Development Standards | 2. Utility facilities and lines shall be located outside of the shoreline area where feasible. When the utility needs to be located within shoreline jurisdiction, mitigation sequencing pursuant to Section 17.40.015 shall be used to justify the location, and utility corridors shall be used, to the extent feasible. | The changes to standard #2 are recommended for consistency with standards 1, 4 and 5, and for readability. |</p>
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>area to pre-development conditions where feasible</td>
<td>Changes to standards 5 and 6 are suggested for clarity, consistency, accuracy and readability.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>elevation, replant with native or pre-existing species, and make provisions for the maintenance and care for the newly planted vegetation.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6. Installation of Accessory utility services to primary authorized uses a development within shoreline jurisdiction shall not require a separate shoreline substantial development permit, but shall be regulated by the specific use regulations and permit requirements for the primary use or activity and the standards of this section.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Utilities located landward of the OHWM shall be placed underground unless shown to be infeasible or if such undergrounding would be significantly detrimental to the environment. Utilities located waterward of the OHWM shall be bridged or bored unless shown to be infeasible or if such approach would be significantly detrimental to the environment.</td>
<td></td>
</tr>
<tr>
<td>UUU</td>
<td>17.70.000 (2) Page 199</td>
<td>Water Quality Goals and Policies</td>
<td>C. Policy: Require reasonable Utilize setbacks and vegetation management areas buffers, and storm water storage basins and require encourage low-impact development techniques and materials where practical to achieve the objective of lessening impacts from shoreline use and development on water quality.</td>
<td>Changes to these policies are suggested for clarity, consistency, accuracy and readability.</td>
</tr>
<tr>
<td>D. Policy: Plan land use and put in place development standards that work with and respect natural drainage features and functions. Generally have an Emphasize on utilization of development techniques for sites that do not alter natural drainage patterns or disrupt the natural recharge processes of the drainage basin. Where intervention is necessary to restore drainage function, locate, design, construct, and maintain ensure measures for controlling erosion, stream flow rates, or flood waters are located, designed, constructed and maintained that will preserve maintain and improve existing water quality.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>F. Policy: Prohibit Discourage uses and activities in shoreline or other sensitive areas where it would that may pose a risk of contamination of ground or surface waters, such as:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>VVV</td>
<td>17.70.010 Pages 200-201</td>
<td>Water Quality Development Standards</td>
<td>3. The City will plan for sewer service to all development within shoreline jurisdiction.</td>
<td>The deletion of standard 1 is suggested because this is not language that requires a mandate or requirement. If the City desires to keep such a statement in its Master Program, it is more appropriately made a policy than a standard.</td>
</tr>
<tr>
<td>12. New development within shoreline jurisdiction shall not be allowed on septic systems. Property with an approved septic tank drainfield permit for a use otherwise authorized under the zoning designation and master program designation shall be allowed to develop such use subject to limitations and conditions as required under the approved septic tank drainfield permit; provided, once the original approval expires, it shall not be renewed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23. When projects a permit or authorization under the Master Program is necessary are proposed for activities associated with existing development operating on septic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The changes to standard 7 are suggested for consistency with the policies in Section 17.69.000, and to differentiate between approaches for utilities landward and landward of the OHWM as done in Section 17.69.000.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</th>
<th>ECOSYSTEM - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td><strong>systems, they shall be required to connect to municipal sewer. If municipal sewer is not available, use of the septic system may be allowed if the development installs stub-outs and any needed agreements are executed to ensure future connection to the sewer service as soon as it is available in the area.</strong></td>
<td></td>
</tr>
<tr>
<td>34.</td>
<td>New development shall provide storm water management facilities designed, constructed, and maintained in accordance with the current storm water management standards of Lacey's Stormwater Drainage Manual. <strong>Preference shall be given to low impact development concepts are preferred.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>45.</td>
<td>Best management practices (BMPs) for control of erosion and sedimentation shall be implemented for all development in shorelines through an approved temporary erosion and sediment control (TESC) plan, or through administrative conditions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>56.</td>
<td>Wood treated with creosote, copper chromium arsenic or pentachlorophenol is prohibited in or above shoreline water bodies.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>62.</td>
<td>All materials that may come in contact with water shall be constructed of materials, such as untreated wood, concrete, approved plastic composites or steel, shall be constructed of materials that will not adversely affect water quality or aquatic plants or animals. Materials used for decking or other structural components shall be approved by applicable state agencies for contact with water to avoid discharge of pollutants from wave splash, rain, or runoff.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 78. | Proper management of vegetation shall be required as a condition of all new development and permit approvals associated with existing development. At a minimum this shall include:  
   A. Shoreline use and development shall minimize, through effective education, site planning and maintenance, the need for chemical fertilizers, pesticides, herbicides or other similar chemical treatments that could contaminate surface or ground water or cause adverse effects on shoreline ecological functions and values;  
   B. Planting of approved vegetation as described in Appendix 2 to promote green shorelines concepts;  
   BC. Compliance with the requirements of Section 17.41.020, regarding vegetation management;  
   CD. In protective covenants and Home Owner Association documents, new plats shall describe acceptable use of organic fertilizers and other green shoreline principals.  

The deletion of standard B under #8 (old; new #7) is suggested because the concepts in Appendix 2 are described elsewhere in this SMP as guidelines or options; they do not prescribe specific action or evoke specific requirements. In addition, standard C (old; new standard B) captures the reference to Appendix 2 that this standard was aiming for.
<table>
<thead>
<tr>
<th>ITEM</th>
<th>SMP PROVISION</th>
<th>TOPIC</th>
<th>BILL FORMAT CHANGES [<strong>underline</strong>-additions; <strong>strikethrough</strong>-deletions]</th>
<th>ECOLOGY - DISCUSSION/RATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>App 1</td>
<td>Appendix 1</td>
<td>Public Access Plan</td>
<td>Please see exhibit C-8. Please note some of the large graphics were removed from this appendix when Exhibit C-8 was created, for formatting reasons.</td>
<td>Ecology is recommending changes to this Appendix to the SMP, mostly for readability and clarity; changes include reorganizing the introduction to follow the chronological order of the document, correcting statements about what the SMP guidelines say about public access, and clarifying the information in the need assessment tables. For ease of review, Exhibit C-8 was created. This attachment illustrates all recommended changes to Appendix 1 in bill format.</td>
</tr>
<tr>
<td>App 2</td>
<td>Appendix 2</td>
<td>Green Shorelines</td>
<td>Three suggested changes. First: &quot;Green Shoreline Landscaping: Vegetation/landscaping Examples and Guidelines&quot; Second, changes to Shoreline Plant List; please see exhibit C-9. Third, page A2-22: These guidelines are highlights of a regional general permit for dock construction issued by the Army Corps of Engineers. Complying with these guidelines can substantially speed up the federal review and permitting for your dock (see &quot;Getting Permits&quot;).</td>
<td>The first change, to the title of the Appendix, is suggested because it does not deal only with landscaping/vegetation. The second change, to the shoreline plant list, is suggested at the request of the City. The City’s forester reviewed the list and recommended some plants be removed from the list and had corrections to the names of many of the listed plants. The third change (deletion) is suggested because the referenced Army Corps regional general permit (RGP) for dock construction is only applicable to Lake Washington.</td>
</tr>
<tr>
<td>App 3</td>
<td>Appendix 3</td>
<td>Restoration Plan</td>
<td>Please see exhibit C-10. Please note some of the large graphics were removed from this appendix when Exhibit C-10 was created, for formatting reasons.</td>
<td>Ecology is recommending changes to this Appendix to the SMP to align with the Analysis and Characterization report. When the reach conditions from that report were brought into this Appendix and refined to address only Lacey, conditions in Lacey’s UGA were not reflected even though the text indicates that they were intended to be. Sections in the original report specific to Lacey, like discussion of the Woodland Creek system, did include the UGA. In addition, text in the tables has been moved so that discussion of protection and restoration opportunities is rightfully located in the ‘Potential Protection and Restoration Measures and Opportunities’ column rather than the level of alteration column. Finally, there was some confusion about the level of alteration/condition qualifiers versus potential for restoration qualifiers (low, moderate, and high) in the tables. Suggested changes reflect information in the Analysis and Characterization report and also align these qualifiers between each column. For example, “low” levels of alteration, which would be likened to the “high” or best condition, cannot equate to “high” potential for restoration. For ease of review, Exhibit C-10 was created. This attachment illustrates all recommended changes to Appendix 3 in bill format.</td>
</tr>
<tr>
<td>App 5</td>
<td>Appendix 5</td>
<td>Cumulative Impacts Assessment</td>
<td>Please see exhibit C-11. Please note some of the large graphics were removed from this appendix when Exhibit C-11 was created, for formatting reasons.</td>
<td>Ecology is recommending changes to this Appendix to the SMP, mostly for consistency with the changes suggested to tables in Appendix 3 as outlined in the cell above. Changes include aligning level of alteration/condition with the potential for restoration in the tables, moving text so that discussion about identified versus predicted impacts is located in the ‘level of</td>
</tr>
<tr>
<td>ITEM</td>
<td>SMP PROVISION</td>
<td>TOPIC</td>
<td>BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]</td>
<td>ECOCITY - DISCUSSION/RATIONAL</td>
</tr>
<tr>
<td>------</td>
<td>---------------</td>
<td>-------</td>
<td>---------------------------------------------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>existing alteration' column versus the 'potential future impacts' column, and including reference to provisions in the SMP aimed at achieving no net loss in discussions about proposed SMP measures' versus 'potential risk'. Other suggested changes reflect revised numbering schemes in the SMP and provisions added/removed since the time the Cumulative Impacts Analysis was originally drafted. This includes removing comparisons of the new SMP to the old SMP when considering cumulative impacts. The SMP Guidelines indicate that an appropriate evaluation of cumulative impacts will consider reasonably foreseeable future development under the policies, programs and regulations of the developing master program.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>For ease of review, Exhibit C-11 was created. This attachment illustrates all recommended changes to Appendix 5 in bill format.</td>
</tr>
</tbody>
</table>

**Exhibits**

Exhibit C-1: Continuation of Recommended Change “W” - Changes to nonconforming uses, lots, and structures section for clarification and readability; achieve consistent use of terms, clarify policies and regulations applying to structures versus uses, and removal of repetitive, unnecessary or confusing/conflicting language.

Exhibit C-2: Continuation of Recommended Change “GG” - Changes to critical saltwater and marine riparian habitat section to improve readability and clarity; rewrite AHG white paper findings, conclusions and recommendations as standards for the SMP.

Exhibit C-3: Continuation of Recommended Change “HH” - Changes to critical freshwater habitat section to improve readability and clarify; where it applies and to delete conflicts with provisions in the City’s Critical Areas Ordinances that were incorporated by reference into the SMP.

Exhibit C-4: Continuation of Recommended Change “QQ” - Changes to vegetation management section for clarification and readability; separation of policies from standards, clarification of thresholds/triggers, and use of consistent references and terms.

Exhibit C-5: Continuation of Recommended Change “CCC” - Changes to public access section for readability and clarity; reduction of volume by combining like policies/standards, consistency with other sections of the document, clarification that the City will evaluate nexus and proportionality on a project by project basis.

Exhibit C-6: Continuation of Recommended Change “III” - Changes to boating facilities section to improve readability and clarity; reduce inadvertent conflicts with other sections of the SMP and remove extensive discussions about the existing Beachcrest marina, most of which is not located within the City’s jurisdiction.

Exhibit C-7: Continuation of Recommended Change “MMMM” - Changes to residential development section; specific references to the mitigation sequence, clarifying density bonuses will be transferred to lands outside of shoreline jurisdiction and clarification that residential development is permitted in shoreline environments other than shoreline residential.

Exhibit C-8: Continuation of Recommended Change “App 1” - Changes to Appendix 1, Public Access Plan, including; reorganization, corrections to statements about the SMP guidelines, and clarification of the need assessment results.

Exhibit C-9: Continuation of Recommended Change “App 2” - Changes to Appendix 2, Green Shorelines plant list, including; removal of certain plants upon recommendations of the City Forester and fixes to the Latin and common names of many of the included plants.

Exhibit C-10: Continuation of Recommended Change “App 3” - Changes to Appendix 3, Restoration Plan, including; inclusion of Lacey’s UGA when discussing reach conditions, the placement of text/discussions about certain topics in the appropriate place in the tables, and aligning level of alteration/condition qualifiers with potential for restoration qualifiers.

Exhibit C-11: Continuation of Recommended Change “App 5” - Changes to Appendix 5, Cumulative Impacts Analysis, including; revisions to tables to incorporate changes to same tables found in Appendix 3 and deletion of language comparing the new SMP to the old SMP.
17.25.000 Nonconforming Uses, Lots and Structures

This section of the SMP has been written in a more narrative and informal discussion style than is typical of most legislation. This was considered necessary to bring the complexity of the topic to the reader in a way that will provide an understanding of what “nonconforming” means, what its implications are and the unique ways Lacey has chosen to implement the concept. Lacey’s treatment of this topic reflects its sensitivity to the needs of landowners that may find themselves in the uncomfortable position of owning homes that do not meet new setbacks.

Lacey’s SMP has been written to soften and avoid with the concerns with of having a home being that is designated as nonconforming in mind. Lacey’s strategy simply excludes the footprint of an existing legally established residences located within the shoreline setback from the ordinary high water mark (OHWM) from being labeled as nonconforming, status while protecting achieving no net loss of shoreline resources through mitigation and restoration as new development or expansion occurs. This and other issues with this topic are discussed and resolved in this section, as it takes the reader step by step through a discussion of the need and purpose and policy guidance for implementation of shoreline regulations.

This section is designed for the customer and the staff to read together as consideration is given to why the regulations exist, what important public interests need to be protected and how the needs of the landowner for the wise management, enjoyment and use of property can be accomplished.

17.25.005 Nonconforming – Fundamental Aspects of the Concept of a Noneconforming Structure or Use and Lacey’s Use of this Concept for the Purpose of in this SMP

1. Traditional application of the term nonconforming:

   Discussion: The term nonconforming use or nonconforming structure is a standard concept used in zoning ordinances. Generally in zoning ordinances, a legal nonconforming status indicates a structure or use does not meet an important standard that is considered necessary for a valid public interest in the current ordinance which has changed and is different from the standard in the ordinance in place at the time the use or structure was legally established.

   Because of the public interest at stake, the nonconforming structure or use may be strictly regulated. Dependent upon a jurisdiction’s emphasis on gaining compliance over time, restrictions on a nonconforming structure regulations can vary from one jurisdiction to another from being permissive to very restrictive.

   Restrictive treatment might include preventing replacement of a structure after such structure is lost to a fire, or restrictions on any expansion. However, generally a balanced approach is taken weighing the public interest with the fair treatment of structures and uses legally established prior to the code requirement.

2. Concern with implications of labeling residential homes as nonconforming:

   Discussion: Because of the possible adverse implications a designation as of nonconforming could have on a home, the City of Lacey has chosen not to create a situation where existing, legally

Comment [CB1]: Recommended changes to this section are intended to strike a balance between the City’s desire to introduce the subject with soft wording and Ecology’s desire for the subject matter to be introduced clearly and concisely. The City’s intent is to be narrative and informal; within this spirit Ecology seeks to ensure the result is not confusion about what the standards are or when and to what they apply.
established single family homes are labeled as nonconforming as a result of new setbacks from the OHWM in this SMP.

At the same time, the City has determined the new setbacks and associated buffer widths and vegetation management areas and retention standards are necessary to achieve protection of shoreline resources and functions values such as water quality.

3. Lacey’s approach for drawing new setbacks and related buffer-vegetation management areas in association with existing, legally established residential homes:

   A. Policy: When establishing for the purposes of setbacks from the OHWM on a waterfront lot for purposes of administering this SMP, the City will “draw” the setback and the associated buffer-vegetation management area around the footprint of any single family residential structure that is too close to the OHWM to meet falls within the new OHWM setback and buffer requirements vegetation management area. In such cases, the setback and buffer-vegetation management area shall wrap around the existing residence in a configuration keeping that excludes the footprint of the residence out of the OHWM setback and buffer-vegetation management area. This will provide for a setback and buffer-vegetation management area surrounding the residence, but will exclude the footprint of the existing residence from classification being labeled as nonconforming because of its location within such area.

   B. Policy: An existing, legally established home where the setback and vegetation management area wrap around all, or a portion of its perimeter, as outlined above, will be considered conforming to the OHWM setback standards of the code in this SMP. Because of its location in relationship to the setback from the OHWM which surrounds it, it is conforming yet limits expansion by location of the setback around the parameter of the footprint, it shall such houses will be referred to as “conforming, expansion limited”.

4. Maintaining conforming status with an approved expansion:

   A. Policy: A proposal for future enlargement or expansion of a residence that is designated “conforming, expansion limited” will be considered in the same way as a proposal for expansion of a structure that is designated nonconforming. Both must meet applicable requirements of this SMP for avoidance, minimization, and mitigation of impacts and no net loss of shoreline function and value.

   B. Policy: If expansion of a “conforming, expansion limited” house can be accommodated pursuant to the requirements-policies and standards of Sections 17.25.015 and 17.25.020, upon approval of the expansion the setback line and the buffer-vegetation management area may be redrawn around the new footprint of the expanded structure to maintain the residence’s status as “conforming, expansion limited”.

5. Nonconforming term used when appropriate for all other structures:

   A. Policy: The term nonconforming will be used and applied to appropriate situations where it is a standard zoning practice in the public interest.

   B. Policy: Application of the term nonconforming will be applied to accessory residential structures such as garages, storage sheds, decks and similar structures not used as a home principle living area where such structures are located within the setback and buffer vegetation management area.
6. General provisions:

   A. **Policy:** Uses, lots or structures within shoreline jurisdiction that were legally established prior to Lacey’s updates of this SMP on (INSERT DATE OF ADOPTION), which do not meet the specific standards of this Master Program, are subject to the nonconforming provisions of Section 17.25.

   B. **Rights of a nonconforming structure, lot or use:**

      **Policy:** Subject to the provisions of this program, a nonconforming use, lot or structure lawfully existing prior to the effective date of this program, (INSERT DATE OF ADOPTION) or any amendment thereto, which is rendered nonconforming or “conforming, expansion limited” by adoption of the Program or an amendment, may continue as is and in the manner and to the extent that it existed upon the effective date of the Program or amendment, respectively.

17.25.010 **Continuance - Contiguous Lots**

**Policy:** When a nonconforming lot is contiguous to another lot and both lots have the same owner, the contiguous lots are deemed a single, undivided lot for purposes of this Program unless:

   A. Each lot has a dwelling;

   B. The purchase of an adjacent lot is subsequent to the adoption of this Program (i.e., May 21, 1976); or

   C. Pursuant to RCW 58.17.170, one or more of the lots is a platted lot, and less than five (5) years has lapsed since the final plat in which either of the lots is located was filed for record.

17.25.015 **Alterations and Expansions of Nonconforming or “Conforming, Expansion Limited” Residential Structures**

1. **General policies and requirements:**

   A. **Policy:** Expansion of all residential structures must meet requirements and standards of the environment designation in which they are located, including setbacks from the OHWM.

   B. **Policy:** Proposals for expansion of a nonconforming structure, or a structure designated “conforming, expansion limited”, shall require review and should include consideration of existing and the potential for increased loss of ecological function.

   C. **Policy:** Expansion of a nonconforming structure or “conforming, limited expansion” structure should meet the test of no increase in nonconformance. No increase in nonconformance means...
an action will not increase an aspect of the structure that resulted in it being designated nonconforming or “conforming, expansion limited” and that it does not materially interfere or jeopardize further the public interest.

D. **Policy**: Vertical expansions (within permissible height restrictions), expansion to the side (within permissible side yard restrictions), or expansion away from the OHWM will generally not be considered an increase in nonconformity. However, expansions vertically or to the side in areas that overlap the OHWM setback or vegetation management area may be considered an increase in nonconformance. Expansion requests of this type should comply with mitigation sequencing and minimize impacts to views and view corridors.

E. **Policy**: Dependent upon impacts identified and appropriate use of the mitigation sequence, expansion of a nonconforming structure or a structure designated “conforming, expansion limited” may be able to expand without increasing overall impact to shoreline resources and result in no net loss of ecological function.

F. **Policy**: Dependent upon impacts identified and appropriate use of the mitigation sequence, expansion of a nonconforming structure or a structure designated “conforming, expansion limited” may be able to expand without increasing overall impact to shoreline resources and result in no net loss of ecological function. Expansion of a structure within the OHWM setback area or vegetation management area will require a vegetation management and mitigation plan to ensure all unavoidable impacts are mitigated for and that no net loss of shoreline ecological function occurs.

2. **Option for mitigation standards and restoration to demonstrate public benefit**:

   A. **Policy Standard**: Requests for expansion of a nonconforming structure or “conforming, expansion limited” residential structure may utilize the mitigation and restoration sequence and mitigation strategies set forth in this SMP to satisfy no net loss requirements and demonstrate improved ecological function and value for the site.

   B. **Standard**: Expansions of nonconforming or “conforming, expansion limited” structures within the vegetation management area shall provide compensatory mitigation in accordance with the thresholds outlined in Section 17.41.021, Table 1.

   C. **Policy Standard**: If expansion of a nonconforming structure or “conforming, expansion limited”, residential structure will result in better management of shoreline resources and public benefit can be realized through mitigation and restoration options, expansion may be approved.

   D. **Policy Standard**: If impacts cannot be the option to implement mitigation and restoration strategies is not utilized or the proposal fails to demonstrate improved protection and or the maintenance of ecological function of the shoreline resources, expansion shall be denied.

3. **Expansion of any structure for a nonconforming use prohibited**:

   **Policy**: Expansion of a structure into the OHWM setback is prohibited when the expansion is to accommodate a nonconforming use. However, when expansion of a structure involves setbacks encroachment into setbacks other than the setbacks to from the OHWM and it does not
impact the public interest, said expansion might be permitted pursuant to other requirements of this SMP.

4. Permit requirements for expansion of a nonconforming structure or a structure designated as “conforming, expansion limited”:

A. **Policy Standard:** Expansion of a nonconforming structure or a structure designated “conforming, expansion limited,” requires special consideration of environmental impacts where such expansion is proposed to further encroach on the OHWM setback by decreasing the distance between the structure and the OHWM. To facilitate this review, expansion of a nonconforming structure or a structure designated as conforming, expansion limited, will require a conditional use permit variance under Section 17.30.020. This does not apply to expansions to the side or rear of the structure within the setback/vegetation management area.

B. **Policy Standard:** Expansion of a nonconforming structure or a structure designated “conforming, expansion limited,” where such expansion does not further encroach upon the OHWM setback or buffer/vegetation management area by decreasing the distance between it and the OHWM, will follow regular permit process requirements outlined in Section 17.30 and Table 3.

17.25.020—Determining Public Interest, Public Benefit and Options for Expansion of a Nonconforming Structure

1. General discussion, policy and requirements:

A. **Discussion:** Generally expansion of a nonconforming structure must meet the test of no increase in nonconformance. No increase in nonconformance means an action will not increase an aspect of the structure that resulted in it being designated nonconforming and that it does not materially interfere or jeopardize further the identified public interest.

B. **Discussion:** Dependent upon impacts identified and possibility of mitigation and/or restoration, a proposal for a nonconforming structure or a structure designated conforming, expansion limited, might be able to expand without increasing overall impact to shoreline resources or no net loss of function or value.

C. **Policy:** Expansion of a structure within the setback area will require a successful plan for mitigation and/or restoration activity to ensure all impacts are mitigated and no net loss of function or value occurs.

2. **Purpose of setback:**

**Discussion:** The purpose of the setback requirement is to establish area for a buffer between the structure and the shoreline. The primary function is to provide physical space, distance and opportunity for native vegetation in this area. Setbacks are important to the public to provide some degree of minimal protection of shoreline area from disruption and modification of the natural ecological system functions and values and natural shoreline processes.

3. **Expansion may be permitted if public interest not compromised:**

Comment [CB4]: This sentence was added to clarify that a variance is required only with expansions proposing to decrease the distance between an existing structure and the OHWM.

Comment [CB5]: These policies and this discussion are suggested to be moved to the previous section where they are followed by applicable and relevant standards.

Comment [CB6]: Already covered in the definitions.

Comment [CB7]: These policies have been suggested for incorporation into the previous section; there they will be followed by applicable and relevant standards.
A. Policy: If the expansion does not increase the footprint towards the water, to further encroach upon the required setback with further impact upon the buffer and buffering functions, it may be permitted provided no public interest is compromised.

B. Policy: This could include vertical height (within permissible height restrictions), or expansion to the side (within permissible side yard restrictions), or expansion away from the shoreline area of a review demonstrates there will be no impact to the public interest.

4. Mitigation and restoration may be used to allow expansion of a nonconforming structure or conforming limited expansion home:

A. Discussion of considerations: An expansion to the side or a vertical expansion can increase the impact of the structure to public interest simply by being bigger. Vertical expansion will occupy additional air space that is within the setback area. A side yard expansion will occupy additional space that is within the setback area and increase impervious surface.

B. Policy: When expansion of a structure would impact the public interest, as in the case of a nonconforming structure, or structure that would become nonconforming, the applicant has the option of pursuing a plan of mitigation and restoration to gain approval. Such expansion may be approved under the impact evaluation, mitigation and restoration provisions of Section 17.40, 17.41, 17.42 and 17.41.021 Table 1.

5. Determination of impact to the public:

A. Policy: For expansion of a nonconforming structure or a structure designated conforming, expansion limited, Lacey will consider the intent behind the setback restriction when considering the impact to the public.

B. Policy: Review will require consideration of what the setback is designed to protect and the actual extent of impacts to the public interest that would be expected. This will include an evaluation of the proposed expansion and specific site circumstances considering what is on the ground.

C. Policy: Consideration of public impacts may include potential future impacts, given expected development and view corridor issues. This evaluation will include, but will not necessarily be limited to, the following considerations:

1) Vertical expansion:
   a) Vertical expansion can have impacts by utilization of airspace above a developed home that is part of a view corridor. In some jurisdictions this may be a concern. However, lakes in Lacey are surrounded by relatively flat property.
   b) Undeveloped sites are generally heavily timbered and developed sites have landscaping including trees that provide a canopy consistent with Lacey’s tree protection regulations and Urban Forest Management Plan.
   c) Given topography and natural vegetation surrounding Lacey’s lakes, there are generally only limited lake views from non-shoreline property. These views are usually from lots immediately behind lakefront properties.

2) Views generally:
   a) Generally, views associated with Lacey’s lakes are from the shoreline looking across the lake. Vertical expansion of a nonconforming structure or residence designated conforming, expansion limited, along Lacey’s lakefronts would generally not impact the ability to view the water from properties surrounding the lakes or from outlying property.

Comment [CB8]: These are suggested to be removed because they are covered by the application of the mitigation sequence in the policies and standards above.

Comment [CB9]: The policies and discussions below are repetitive; they cover discussions and information already presented in this document and do not add anything of substance to this section of the document. These ideas, concepts and considerations are already addressed in the policies and standards applicable to use and development of all types in shoreline jurisdiction; they are not unique to alteration or expansion of nonconforming or “conforming, expansion limited” structures. It is suggested that this text be deleted as the discussion is not essential to understanding, implementing or administering the SMP. In addition, the required changes portion of the State’s decision (Appendix B) outlined that the City cannot require restoration of shoreline areas above and beyond mitigation for project impacts. The same caution applies to this section regarding public benefit and assumed future costs.
b) One exception would be homes adjacent to the expansion that may have their view partially impacted when looking towards the expanded home or homes immediately adjacent and behind the waterfront home. Consideration of this concern will generally include use of the following development requirements:

i) Utilize design requirements of LMC Section 16.12.050 D, as illustrated in Table 16T-72, to step back the second story to reduce the impact of the expansion to properties both to the side and behind the home;

ii) Meet requirements of Lacey’s Public Access Plan for upland views by staggering homes in consideration of view corridors between homes. Where placement of homes has provided views to adjacent upland homes, these should be maintained in design of expansions.

3) Side yard expansions:

a) Typically side yards will be between 5 and 15 feet wide, have been modified during construction of the home, planted with grass and delineated with a fence to define property boundaries.

b) An expansion to the side yard could impact the public’s interest in a couple of ways. It might eliminate additional natural vegetation protecting the shoreline, or it could increase the volume of runoff and have increased drainage impacts to the shoreline, particularly if natural vegetation has been removed.

4) Side yard impact present: Some impact from a side yard expansion will normally be present. However, depending upon the scope and design, these impacts would usually be minimal and could be mitigated by design requirements to consider views or planting native vegetation and restoration for drainage concerns.

5) Consideration of future impacts:

a) Even if there are no current views a vertical expansion would impact and no native vegetation on the side yard or drainage concerns that would further impact the shoreline, there may still be future opportunities that could be lost by allowing the expansion to occur.

b) If an expansion takes place there may be future costs associated with the expansion including views from future homes not yet built or the opportunity to re-vegetate the side yard.

c) These costs need to be considered when developing mitigation and restoration plans.

6. Benefits of landscaping associated with new construction and expansion of nonconforming structure or a structure designated conforming, expansion limited:

A. Discussion of purpose: As discussed in Lacey’s Urban Forest Management Plan and Part Two of this SMP, native vegetation, particularly trees, have significant benefit to the community. In addition to benefits of vegetation discussed in Part Two of this SMP, the landscaping standards of this SMP will help implement the community’s expectations for protection of Lacey’s natural aesthetic qualities and capitalize on the benefits trees and native vegetation provide.

Many proposed expansions will hold the potential for additional improvement by vegetative restoration and mitigation requirements. With either of the vertical or side yard expansions discussed above, a proportionate share of natural indigenous vegetation, or approved equivalent, will be required.
Through these landscaping requirements, reintroducing native landscaping along Lacey’s shoreline will act as an incremental restoration strategy. This strategy is expected to improve the urbanized lake shoreline environment over the long term.

**B. Policy:** Where a shoreline buffer area is not fully landscaped with natural indigenous vegetation or species accomplishing the same objectives, landscaping is required for shoreline frontage with all new permits that establish a new use or structure or increase an existing structure’s square footage.

**C. Policy:** When landscaping standards are applied to expansion of a nonconforming structure or a structure designated as conforming, expansion limited, standards shall include a mitigation and restoration component in addition to standard requirements as provided in Table 1, Section 17.41.024.

7. Case by case review for expansion of nonconforming structures or a structure designated conforming, expansion limited:

**A. Discussion:** There are many benefits of native vegetation to the Lacey community. These benefits are discussed in Lacey’s Urban Forest Management Plan, Lacey’s tree protection ordinance (LMC Chapter 14.32), Part Two of this SMP and the landscaping section of Lacey’s zoning code (LMC Chapter 16.80).

In addition, there is an expected added benefit of improving the health of shoreline resources when landscaping requirements are applied to lake-side or creek-side properties that will result in incremental restoration of shoreline buffers over the long term.

These benefits can be realized by both property owners and the general public when applied to expansion or redevelopment of nonconforming structures or a structure designated conforming, expansion limited.

**B. Policy:** The City will review expansions of a nonconforming structure or a structure designated conforming, expansion limited, on a case by case basis to determine actual impacts to public value and potential restoration opportunities with public benefits.

**C. Policy:** The City will have the option to approve an expansion of a nonconforming structure or a structure designated conforming, expansion limited, provided:

1) No expansion will be permitted towards the water;

2) The City determines there is no loss to the public interest and no net loss of value or function given mitigation opportunities (satisfies no net loss policy);

3) Re-vegetation or restoration benefits would be expected to have a positive impact to the shoreline involved for an overall gain in function and value.

8. No expansion where public interest is adversely impacted:

**Policy:** The applicant shall not be allowed to expand, regardless of re-vegetation or restoration opportunities if the City determines there is a significant identifiable public interest that is adversely impacted or loss of ecological function that cannot be mitigated.

9. Assumed future costs:

---

Comment [CB10]: This is covered by discussion of the application of the mitigation sequence in sections above.
A. **Discussion:** There may be future costs and risks of unidentified impacts from an expanding nonconforming structure or a structure designated conforming, expansion limited. Because of potential costs and impacts to the public interest these expansions represent, requirements for expansion of a structure in this situation may involve more mitigation and restoration than conforming and permitted structures that do not require building over a setback line or within the designated buffer area.

B. **Policy:** Mitigation of public interest issues associated with the specific expansion will be required as well as normal landscaping required of all projects to fill out the designated buffer. Requirements for landscaping of nonconforming structures or a structure designated conforming, expansion limited, and other conforming structures are shown in Table 1 in Section 17.41.021.

### 17.25.025 Expansions of Nonconforming Uses

**Policy/Standard:** The expansion of a nonconforming use is **shall** be prohibited. An intensification of use is permitted when the intensified use is contained within the existing structure, or area which has been in use, and is not different in kind from the existing nonconforming use. Refer to Section 17.47 for policies and standards relating to expansion of a pre-existing approved use as defined in this SMP.

### 17.25.030 Relocation of Nonconforming or **Pre-Existing “Conforming, Expansion Limited”** Structure

1. **Policy:** Generally a nonconforming structure must be brought into compliance with the Shoreline Master Program when it is moved. However, in circumstances where compliance with the existing setback is not possible or would result in extraordinary difficulty, the Administrator may allow the structure to be moved to a new location still within the setback area.

2. **Policy:** When a nonconforming structure or a structure designated “conforming, expansion limited”, is moved, the new location should decrease the nonconformance or increase the setback from the OHWM and **not result in a positive an** impact on the shorelines functions and values. In circumstances where compliance with the OHWM setback is not possible or would result in extraordinary hardship, the Administrator may allow the structure to be moved to a new location within the setback area.

3. **Policy:** The decision to allow a nonconforming structure or a structure designated conforming, expansion limited, to be relocated into another area that is not out of the designated setback area will be at the sole discretion of the Administrator, based upon a review of the situation and applicable facts and may be conditioned on mitigation and/or restoration needs of the site.

4. **Policy/Standard:** The process of reviewing relocation of **moving a nonconforming** structure or **“conforming, expansion limited”** structure within to another location within the setback area to another area that is not out of the setback area shall be a conditional use permit.

---

Comment [CB11]: This change is suggested for clarity and consistency and to call attention to the exception to this standard elsewhere in the SMP.

Comment [CB12]: Changes to this section are suggested for clarity, consistency, and to differentiate between policies and standards.
17.25.035 Resumption of Discontinued or Abandoned Nonconforming Use or Structure

1. Policy: A nonconforming use or structure, when abandoned or discontinued, shall not be resumed. Discontinuance or abandonment is presumed to occur when the land or a structure is not used for a particular use for eighteen (18) consecutive months pursuant to Lacey's nonconforming use provisions in LMC 16.93.030. Any person may appeal the Administrator’s determination that discontinuance or abandonment has occurred pursuant to the requirements of LMC 2.30 and Chapter One of the Development Guidelines and Public Works Standards.

2. Policy: Any person may appeal a staff determination that discontinuance or abandonment has occurred by filing an appeal with the City pursuant to the requirements of LMC 2.30 and Chapter One of the Development Guidelines and Public Works Standards.

17.25.040 Development of a Nonconforming Lot

Policy: When the shape or size of an existing, legally created lot would prevent development of a nonconforming lot consistent with the applicable setback, bulk or dimensional requirements in this SMP, the Administrator may authorize development under the following conditions:

A. A written request is received from the project proponent;

B. The development will be located as far landward as possible from the ordinary high-water mark;

C. The decision of the Administrator is based upon the shoreline variance criteria found in Section 17.30.020.

17.25.045 Notification for the Development of a Nonconforming Lot

1. Policy: Upon receiving a written request, the Administrator shall mail notice of the request to all property owners within three hundred (300) feet. At a minimum, the notice shall state the following:

A. The decision on the request will be made within ten days from the date that the notice was mailed; and

B. Interested citizens may contact the Shoreline Administrator for further information and to learn the Administrator's decision.

2. Policy: Appeal of the Administrator's decision shall be made in accordance with the procedures of appeal established in LMC 2.30 and Chapter One of the Development Guidelines and Public Works Standards.
17.25.050  Reconstruction of a Nonconforming Structure

1. Policy: In the event that a nonconforming structure is destroyed by fire, explosion, natural catastrophe, or act of public enemy, nothing in this Program shall prevent the reconstruction of that or a more conforming structure provided a building permit must be obtained for reconstruction within one (1) year after the destruction and timely progress towards completion of the reconstruction must be demonstrated.

2. Policy: If progress towards completion is not demonstrated the building permit shall expire without an opportunity for renewal.

17.25.055  Conversion of a Nonconforming Use

Policy: A nonconforming use may not be converted to a prohibited use.

Comment [CB13]: Does this also apply to 'conforming, expansion limited' structures? If so, please add the appropriate language.
17.35.000 Relationship to Other Land Use Regulations

17.35.005 Local Permits, Approvals and Shoreline Exemptions

1. **Building permits and other activities requiring City review - Shoreline Permits.** In the case of development subject to the shoreline permit requirement of this program, the Administrator shall not issue a building permit for such development until a shoreline permit has been granted. Also, any permit issued by the Administrator for such development shall be subject to the same terms and conditions that apply to the shoreline permit.

2. **Activities exempt from shoreline permit requirements** - In the case of development subject to regulations of this program, but exempt from the shoreline substantial development permit requirement, any required statement of exemption shall be obtained prior to issuance of the building permit or applicable approval. For single family residences, a building permit reviewed and signed off by the Administrator and including any conditions, may substitute for a written statement of exemption.

3. **All land use planning permits** - The City shall use a “shoreline zoning overlay” designation to integrate the Shoreline Master Program map and all standards of the Shoreline Master Program with the Lacey zoning code. This overlay zoning will provide the basis for review and application of standards and conditions for all of the City's land use planning processes and permits. **For all planning permits and approvals the Administrator shall attach conditions and mitigation measures as necessary to ensure that the design, development, functionality and use is consistent with the goals, policies, standards and intent of this program.** This will include all planning permits and approvals such as zoning conditional use permits, variances, site plan review, environmental permits and land divisions, including short subdivisions, long subdivisions, binding site plans and condominium conversions.

4. **Planning permits and conditions** - For all planning permits and approvals the Administrator shall attach conditions and mitigation measures as necessary to ensure that the design, development, functionality and use is consistent with the goals, policies, standards and intent of this program.

17.35.010 Compliance with Existing Development Regulations

Uses and Developments within shoreline jurisdiction shall comply with City development standards, and applicable state and federal regulations, provided they do not conflict with the shoreline goals, shoreline policies, and development regulations of this program. In the case of conflicts between specific standards and regulations the most restrictive shall usually apply and shoreline goals and policies of the Shoreline Management Act and this Program shall always guide interpretation of the most appropriate standard to apply.
17.35.015 Critical Areas Ordinance Categories

The City of Lacey Critical Area Ordinances, contained in Title 14 of the Lacey Municipal Code, shall be adopted as a part of this master plan, with the exception of the critical area category of areas with a critical recharging effect on aquifers used for potable waters; see list of Sections in 17.10.020.

17.35.020 Critical Areas Regulations within Shoreline Jurisdiction

1. Adoption of Critical Area Ordinances of LMC Chapter 14, with exceptions:

The City of Lacey Critical Area Ordinances, in Title 14 of the Lacey Municipal Code, shall be adopted as a part of this SMP, with a few exceptions. The intent of referencing and use of critical area legislation is to provide the best protection for these resources. It is also the intent of this SMP to apply a consistent and efficient consolidated process for review and action on proposals involving these resources. To these purposes, the critical area ordinances are adopted as part of the SMP with the following exceptions:

A. Exceptions of certain provisions in conflict with the intent of the SMP:

Where there are provisions in Chapter 14 that are less restrictive than the SMP, those provisions will not be applied. However, where there are provisions that are more restrictive than the SMP, they will generally be applied, except as provided for in this section of the SMP (17.35). The intent is to ensure the provision providing the most protection is always applied. To this purpose, the following provisions within Chapter 14 shall not apply to proposals involving critical areas that are within shoreline jurisdiction:

1) “Exempt uses and activities” or “exceptions” or “exemptions”, LMC 14.28.140, LMC 14.33.080 and LMC 14.37.080. - The only “exemptions” allowed within shoreline jurisdiction are those listed as being exempt from a shoreline substantial development permit. See Section 17.30.035.

2) “Administratively authorized uses and activities” or “allowed activities” - Any activity which is not exempt within shoreline jurisdiction will require a shoreline substantial development permit, shoreline conditional use permit, or shoreline variance.

3) “Reduction of standard buffer zone width” - Reduction of the standard Critical Area Ordinance buffer width within shoreline jurisdiction may be authorized by the Administrator in accordance with provisions in the critical areas regulations as adopted into this SMP, when the reduction is up to 25%. Reductions of more than 25% of the standard buffer width shall require a shoreline variance. Reductions shall not be combined with buffer width averaging.

4) “Administrative variances” - Administrative variances, being variances authorized by the Administrator without the use of a shoreline variance, are prohibited within shoreline jurisdiction.

5) “Standard buffer width averaging” - Critical Area Ordinance buffer averaging within shoreline jurisdiction will require a shoreline variance. In the case of an associated wetland, the edge of the wetland is the edge of the shoreline jurisdiction.
---

36) “Reduction to wetland replacement ratios”, LMC 14.28.445 (B) and 14.28.450 D (2) - A reduction of the wetland replacement ratio within shoreline jurisdiction will require a shoreline variance.

52) “Reasonable use exception” - Within a shoreline jurisdiction, a shoreline conditional use permit and/or shoreline variance will serve as a reasonable use exception review.

7) “Building Setback Lines” - Within shoreline jurisdiction, the requirement to locate the setback line a distance that corresponds to the required yard area setback for the underlying zone from the edge of a wetland buffer (LMC 14.28.340) or designated priority habitat or species buffer (LMC 14.33.190) shall not apply.

B. Exception of certain provisions related to permit process and timing:

1) Permit processes: Where processes or timelines identified in the SMP conflict with critical area ordinance permit processes or timelines in LMC Chapter 14, the requirements of the SMP shall apply. Specific permits used to review and condition proposals within Chapter 14 of the LMC shall be dovetailed with the underlying SMP permit or approval. The underlying permit and process and timeline used in the SMP shall be utilized.

The SMP has specific permit process requirements and provisions that apply to the review and approval process for all activities, uses and modifications. All necessary review requirements, standards and mitigation shall be accomplished under the umbrella of the defined Shoreline Master Program review process(es) and permit(s).

Example process: As an example of B. 1) above, an activity, use or structure requiring a conditional use permit under shorelines jurisdiction will always require a CUP under the SMP, with associated DOE review, regardless of what it might be called and processed as under a critical area ordinance. Likewise, timing requirements, extensions (if permitted) for permits or approvals shall also follow the format and timing of the SMP, instead of critical area ordinance timing which is specific to its critical area permit requirements.

C. Exception related to buffer widths for freshwater critical areas in the shoreline residential zone: Within the shoreline residential environment designation zone, buffers for freshwater critical habitat areas along lake front platted lots will dovetail may be reduced to match setbacks from the OHWM as identified for the most intensive use expected for the property as illustrated in Section 17.24.015, Table 4; see Section 17.35.027.

2. Standards of critical area ordinances and principals and requirements of the SMP:

A. All standards and provisions of the critical area ordinances, relative to performance of a proposal standards and protection of critical areas and resources, are considered a fundamental requirement and the purpose of review. All specific standards and regulatory provisions of the critical area ordinances shall apply provided they are consistent with Section 17.35.020 1. A. above.

B. In addition to the exacting standards for the protection of critical area resources contained within the adopted critical area ordinances, the underlying principals and requirements of the SMP, for aNo net loss of ecological function and value and mitigation sequencing, shall be the baseline criteria for evaluation, conditioning and permit and exemption actions.

3. Critical area principles:

---

Exhibit C-2: Continuation of Recommended Change “GG” 3
A. Principles: The following principles are embodied within Lacey’s Critical Area Ordinances, but are not so stated in relationship to shoreline management areas. These principals are stated here for clarity of purpose in application of Lacey’s Critical Area Ordinances in shoreline jurisdiction under this SMP:

1) Planning objectives: The planning objectives of for critical areas in shoreline management provisions for critical areas-jurisdiction shall be in the protection of existing ecological functions and ecosystem-wide processes, and restoration of degraded ecological functions and ecosystem-wide processes.

2) Regulatory provisions: The regulatory provisions for critical areas shall are intended to protect existing ecological functions and ecosystem-wide processes.

3) Protection, use and enjoyment: An underlying intent is to promote human uses and values that are compatible with the other objectives of the Shoreline Management Act and this Shoreline Master Program, such as public access and aesthetic values, provided they do not significantly adversely impact critical areas and shoreline ecological functions.

17.35.030 Critical Saltwater Habitat and Marine Riparian Habitat

1. Location and critical area type: The marine habitat shoreline in Lacey runs generally from the Butterball Cove area to Mallard Cove. The shorelands are adjacent Much of this area is to aquatic areas that are designated as critical saltwater habitat. This, which includes pocket estuaries, eel grass beds, forage fish spawning habitat and feeder bluffs; see Map L14 habitat area identified in the inventory.

2. Shoreline designation: With the exception of the area where the existing marina is located in Mallard Cove, areas landward of the OHWM and associated wetlands and pocket estuaries have been designated as natural. The site Areas immediately surrounding the marina are designated urban conservancy. Areas water ward of the OHWM are designated aquatic; see map designations in Appendix 6.

3. Land use and use of beach area: The majority of this area is in the Hawks Prairie Planned Community. Conditions for the planned community restrict development and preserve the area for enjoyment as passive open space for passive activity. Trails provide visual and physical access to the beach. The trail is owned by the Planned Community’s homeowners association, but historically this access has also been used by the general public. The Hawks Prairie Planned Community has a trail that provides visual access to this beach. At the end of the trail there is a viewing platform that provides visual access to this stretch of beach. This provides access opportunity without requiring access to the beach. However, pedestrian access to the beach is currently available and utilized extensively by Hawks Prairie Planned Community residents.

At the time of this writing, the trail is under the ownership of the Community Homeowners Association and it is responsible for the maintenance of this trail. Access to this trail is currently not restricted. Historically, this access has been available for the general public. However, it is not in public ownership at this time. This access is very valuable to the public as it is the only marine access in the City of Lacey. Work with the HOA to secure this access for use by the general public may be an option for future consideration.
There is an old pier on the beach that had been used during the war for transport of dynamite from Dupont. Maps refer to this pier as the Atlas Powder Dock. It is currently abandoned and unusable. Whether this pier might be able to provide some future public use (like a public fishing pier) is unknown. Significant work to restore the pier would be necessary.

A portion of the area east of the planned community has a private marina that is part of the Beachcrest community. The Beachcrest community also has access to the beach and marina by roads constructed as part of the original development in the 1950s, see land use map L-2 in inventory.

The existing marina in Mallard Cove is private and belongs to the Beachcrest Community. It is interesting to note that The Beachcrest subdivision is located in Thurston County, but a portion of the marina falls is actually on property within the Hawks Prairie Planned Community and within the City of Lacey. This portion of property has an easement giving Beachcrest the right to operate the marina. This was a result of early surveying issues when the marina was established in the 1950s and later agreements between the owners of the land where the marina is situated and the Beachcrest Community Association.

### 17.35.031 Specific Management Goals and Policies for Protection of Marine Riparian Habitat

1. **Goal:** Achieve and protect Lacey’s marine riparian habitat areas and achieve no net loss of ecological functions or values over the long term in these areas.

   **A. Policy:** Utilize the best available science recommendations provided in literature from state resource agencies when developing standards and reviewing habitat management plans, as provided for in LMC 14.33 and incorporated into this SMP, for activities in marine riparian habitat areas.

   **B. Policy:** Utilize requirements standards of in Lacey’s critical areas ordinances habitat, wetland, and tree and vegetation and geologically sensitive area protection legislation, as appropriate, to protect marine riparian habitat resources, areas and achieve no net loss objectives of this SMP; LMC Chapter 14.28, 14.32, 14.33 and 14.37.

   **C. Policy:** Adopt Utilize the recommendations and “general conclusions” of the report white paper “Protection of Marine Riparian Functions in Puget Sound, Washington,” prepared by the State’s Aquatic Habitat Guidelines (AHG) Program when considering the importance of marine riparian areas and reviewing proposed uses and activities in these areas, including:
   1) “General conclusions” identified in Section VI of the report;
   2) “Overarching” recommendations identified in Section VI of the report;
   3) “Impact specific” recommendations identified in Section VI of the report.

   **D. Policy:** Adopt the “general conclusions” in Section IV of the AHG white paper as findings in regard to the importance of marine riparian areas. These conclusions should be considered when designing projects and developing management strategies for activities proposed within marine riparian areas.

Comment [CB4]: It is suggested that this section be moved from its original location in the following section to here. This language comes from the AHG white paper, which was written as guidance and is not appropriate for incorporating into the SMP as standards. It is more accurately a policy.
1. Riparian areas perform important hydrologic, geomorphic, and biological functions. These areas encompass complex above- and below-ground habitats created by the convergence of biophysical processes in the transition zone between aquatic and terrestrial ecosystems.

2. **B.** Riparian areas cannot be thought of in isolation from associated water bodies. The characteristic geomorphology, plant communities, and associated aquatic and wildlife species of riparian and marine systems are intrinsically linked.

3. **C.** Natural riparian systems have adapted to specific disturbance regimes. Managing riparian areas without regard to their dynamic patterns and influences of adjacent water bodies ignores a fundamental aspect of how these systems function.

4. **D.** Riparian areas, in proportion to their area within a watershed, perform more biologically productive functions than do uplands. Riparian areas provide a wide range of functions, such as microclimate modification and shade, bank stabilization and modification of sediment processes, contributions of organic matter and large wood to aquatic systems, nutrient retention and cycling, wildlife habitat, and general food web support for a wide range of aquatic and terrestrial organisms.

5. **E.** Riparian areas are effective in filtering and transforming materials (such as dissolved and particulate nonpoint source pollutants) from hill slope runoff.

6. **F.** Because riparian areas are located at the convergence of terrestrial and aquatic ecosystems, they are regional hot spots of biodiversity and often exhibit high rates of biological productivity in marked contrast to the larger landscape.

7. **G.** During the last decade, a patchwork of federal, state, and local laws and programs has come to acknowledge the importance of riparian areas and to require or encourage special management to restore or protect their essential functions, although the degree of protection, the focus, and the spatial coverage of these laws and programs are highly variable among federal, state, and local levels.

**D. Policy:** Adopt the “overarching recommendations” in Section IV of the AHG white paper as management strategies for marine riparian areas. These strategies should be considered in the design and management of all projects proposed within marine riparian areas:

1. **Protect marine riparian soils and vegetation** – prevent damage to native riparian soils and vegetation, including clearing and grading, compaction, covering (paving) and removal.

2. **Restore damaged marine riparian habitat** – restore vegetation, soil characteristics.

3. **Account for scale issues (temporal and spatial)** when evaluating riparian condition, current functions and potential for future functions, and cumulative effects of alterations. The dynamic nature and connectivity of riparian areas and linkages between riparian and aquatic systems operate at multiple scales.

4. **Exclude all major sources of contamination from the riparian buffer** including construction, impervious surfaces, mining, septic system drain fields, agricultural activity, clear cutting and application of pesticides and herbicides.
5. Manage riparian areas for the long-term. For many sites, substantial time, on the order of years to decades, will be required for vegetation to become fully functional.

17.35.032 Specific Standards for Protection of Lacey’s Marine Riparian Habitat

1. Standard: The following general principles and conclusions shall be incorporated into the design and management strategies for any projects proposed within marine riparian habitat areas. Management strategies developed based upon these principles and conclusions shall be detailed within a habitat management plan and incorporated as conditions of the project:

   A. Riparian areas perform important hydrologic, geomorphic, and biological functions. These areas encompass complex above- and below-ground habitats created by the convergence of biophysical processes in the transition zone between aquatic and terrestrial ecosystems.

   B. Riparian areas cannot be thought of in isolation from associated water bodies. The characteristic geomorphology, plant communities, and associated aquatic and wildlife species of riparian and marine systems are intrinsically linked.

   C. Natural riparian systems have adapted to specific disturbance regimes. Managing riparian areas without regard to their dynamic patterns and influences of adjacent water bodies ignores a fundamental aspect of how these systems function.

   D. Riparian areas, in proportion to their area within a watershed, perform more biologically productive functions than do uplands. Riparian areas provide a wide range of functions, such as microclimate modification and shade, bank stabilization and modification of sediment processes, contributions of organic matter and large wood to aquatic systems, nutrient retention and cycling, wildlife habitat, and general food web support for a wide range of aquatic and terrestrial organisms.

   E. Riparian areas are effective in filtering and transforming materials (such as dissolved and particulate nonpoint source pollutants) from hill slope runoff.

   F. Because riparian areas are located at the convergence of terrestrial and aquatic ecosystems, they are regional hot spots of biodiversity and often exhibit high rates of biological productivity in marked contrast to the larger landscape.

   G. During the last decade, a patchwork of federal, state, and local laws and programs has come to acknowledge the importance of riparian areas and to require or encourage special management to restore or protect their essential functions, although the degree of protection, the focus, and the spatial coverage of these laws and programs are highly variable among federal, state, and local levels.

3. Standard: The following “Overarching Recommendations” shall be incorporated into project requirements and detailed within a habitat management plan for any proposal, use or activity planned within Lacey’s marine riparian habitat areas.
A. Protect marine riparian soils and vegetation—prevent damage to native riparian soils and vegetation, including clearing and grading, compaction, covering (paving) and removal.

B. Restore damaged marine riparian habitat—restore vegetation, soil characteristics.

C. Account for scale issues (temporal and spatial) when evaluating riparian condition, current functions and potential for future functions, and cumulative effects of alterations. The dynamic nature and connectivity of riparian areas and linkages between riparian and aquatic systems operate at multiple scales.

D. Exclude all major sources of contamination from the riparian buffer, including construction, impervious surfaces, mining, septic system drain fields, agricultural activity, clear cutting and application of pesticides and herbicides.

E. Manage riparian areas for the long-term. For many sites, substantial time, on the order of years to decades, will be required for vegetation to become fully functional (NRC 2002).

F. Requiring additional structural setbacks (10-30 ft) landward of buffers will allow routine maintenance of structures without compromising buffer function integrity.

31. **Standard:** The following “**Standards: Recommendations to Avoid or Minimize Specific Impacts**” from the AHG white paper, as modified, shall be incorporated into the design and management of all projects within marine riparian areas. Project conditions and Compliance with these standards shall be detailed within a habitat management plan for any proposal, use or activity within Lacey’s marine riparian habitat area. Provided if one of the provisions contained herein below is less restrictive than another provision in within Lacey’s critical area ordinances and in this SMP, the most restrictive and protective shall apply:

A. **Avoid any Vegetation** removal on shorelines and bluffs shall be avoided to the maximum extent possible. If vegetation must be removed, minimize the area and amount removed shall be minimized and located the disturbed area of the required buffer width away-as far landward of from the ordinary high water mark as possible. Minimize ground disturbance, removal of mature trees, and introduction of nonnative vegetation, especially invasive species such as English Ivy, shall be minimized.

B. **Prohibit location of Impervious surfaces** shall not be located in marine riparian buffers areas. If impervious surfaces are must be located within or adjacent close to marine riparian areas, the minimize footprint shall be minimized and impacts shall be mitigated impacts through techniques such as the use of including pervious surfaces such as like pervious pavers and concrete, bioretention facilities such as rain gardens, green roofs, cisterns, etc. Promote infiltration and implement approved methods/designs for controlling rates of surface runoff and pollutant loading shall be minimized. Caution should be taken when designing and installing bioretention and other facilities that infiltrate water, if located along slopes and bluffs, along slopes and bluffs shall be designed so as to not increase the likelihood of mass failures or erosion. Note: This provision has been modified to be consistent with Lacey’s sensitive area ordinances relating to prohibition on impervious surfaces within a designated buffer.

C. **Avoid Shoreline modification** shall be avoided to the maximum extent possible. Maintain existing native vegetation shall be maintained, particularly at and near the land-water interface. If shoreline alterations must occur they shall be done in a way that minimizes potential negative

**Comment [CB6]:** After moving this information to the section above, it is suggested that this provision be deleted. It conflicts with other setback information in the SMP, and none of the remaining standards implement it.

**Comment [CB7]:** It is suggested that this statement be deleted because an outright prohibition like this was not found in any of the LMC critical area chapters. In addition, all of these provisions have been modified in minor ways for inclusion into this SMP, so the point is moot.
impacts to natural functions and shall use the least intrusive methods, including bioengineering, or relocating structures where feasible and practical. All adverse impacts shall be receive fully compensatory mitigation to promote no net loss of ecological functions.

D. **Remove invasive plant species** shall be removed from marine riparian areas. Purple Loosestrife, Himalayan blackberry, English Ivy and other invasive plants compete with native species, particularly in disturbed sites along marine bluffs and shorelines.

E. **As appropriate through the mitigation sequence**, restore and replant marine riparian areas with native vegetation according to a habitat management plan to improve the connectivity of between upland and marine riparian habitat and to restore functions that benefit the nearshore and beach ecosystems. Ensure that Replanted marine riparian areas shall be properly maintained so as to improve plant survival.

F. **Prohibit** buildings shall be discouraged within the marine riparian buffers. If authorized through the appropriate permitting process contained in this SMP, minimize the footprint, and site disturbance of structures shall be minimized and structures shall be located as far landward enough back from the water’s edge to ensure maintenance of functional riparian areas as possible. Note: This provision has been modified to be consistent with Lacey’s sensitive area ordinances relating to prohibition on building within a designated buffer.

G. **Prohibit locating septic systems** and new waste water systems are prohibited in the marine riparian areas. If an existing system is located in the riparian area, restoration activity should be designed to minimize impact and improve the existing situation. Existing systems within the drainage basin that could impact the riparian area should be maintained, and operated in such a way that human waste and nutrients are prevented from leaching into local water bodies. Note: This provision has been modified to be consistent with Lacey’s sensitive area ordinances relating to prohibition on septic and drainage systems within a designated buffer.

H. **Avoid disturbance to native vegetation** shall be avoided in the marine riparian areas, especially near the water’s edge, with the goal of maintaining vegetation communities that are resilient to disturbance from surrounding land uses and able to regenerate with minimal human intervention, and to help ensure that nutrients, pathogens, toxics, and fine sediments associated with land-use practices shall be prevented from entering marine water bodies.

I. **According to mitigation sequencing of Section 17.40.015**, avoid land use practices in riparian areas that involve the use or generation of nutrients, pathogens, and toxics. Avoid salvage or removal of downed trees, LWD or snags in riparian areas and on beaches shall be avoided. All efforts shall be made to maintain complex, multi-aged riparian forest cover and wide buffers to allow natural recruitment of LWD over long time frames.

J. **Mitigation sequencing of Section 17.40.015** shall be utilized for all activities in marine riparian buffers. Impacts that cannot be avoided shall be fully mitigated.

4. **Standard**: Requirements of 17.35.032 of this SMP are supplemental to the core critical area requirements of Lacey’s critical area ordinances. All applicable requirements and standards of Lacey’s habitat, wetland, tree and vegetation and geologically sensitive area protection legislation shall be satisfied; LMC Chapter 14.28, 14.32, 14.33 and 14.37.

**Comment [CB8]**: It is suggested that this standard be deleted because it repeats what has already been stated above.
17.35.033 **Specific Management Goals** and Policies for Protection of Critical Saltwater Habitat

1. **Goal:** Achieve protection of Lacey’s critical saltwater habitat areas and achieve no net loss of ecological functions or values over the long-term in these areas.

   A. **Policy:** Utilize the best available science recommendations provided in literature from state resource agencies when developing standards and reviewing habitat management plans for projects intruding into or over critical saltwater habitat areas.

   B. **Policy:** Because ecological functions of marine shorelands can affect the viability of critical saltwater habitat, effective protection of critical saltwater habitats should integrate the policies for management of shorelands, outlined in Section 17.35.031, with management policies for submerged areas. Where applicable to critical saltwater habitats, adopt recommendations and “general conclusions” of the report “Protection of Marine Riparian Functions in Puget Sound, Washington” prepared by the State’s Aquatic Habitat Guidelines Program including:

   1) “General conclusions” identified in Section VI of the report;
   2) “Overarching” recommendations identified in Section VI of the report;
   3) “Impact specific” recommendations identified in Section VI of the report.

   C. **Policy:** Much of Lacey’s critical saltwater habitat overlaps with the marine riparian areas. Where there is overlap, goals, policies and standards for marine riparian areas identified in Sections 17.35.031 and 17.35.032 will be applied to Lacey’s saltwater critical habitat.

   D. **Policy:** In addition to applicable requirements of Section 17.35 and LMC Chapter 14.33, management planning for saltwater critical areas shall always include an evaluation of current data and trends and appropriate planning elements as identified in DOE’s guidelines, including the following:

   1) Available inventory and collection of necessary data regarding physical characteristics of the habitat, including upland conditions, and any information on species population trends;
   2) Terrestrial and aquatic vegetation;
   3) The level of human activity in such areas, including the presence of roads and level of recreational types (passive or active recreation may be appropriate for certain areas and habitats);
   4) Restoration potential;
   5) Tributaries and small streams flowing into marine waters;
   6) Dock and bulkhead construction, including an inventory of bulkheads serving no protective purpose;
   7) Conditions and ecological functions in the near-shore area;
   8) Uses surrounding the critical saltwater habitat areas that may negatively impact those areas, including permanent or occasional upland, beach, or over-water uses; and
   9) An analysis of what data gaps exist and a strategy for gaining this information.

   E. **Policy:** Activities in, over or adjacent to critical saltwater habitat Management plans for saltwater habitat should include the following, where applicable minimum considerations:

Comment [CB9]: It is suggested that this provision be deleted; these sections of the Guidelines represent guidance for local government on how to plan for management of critical saltwater habitat and are not appropriate as local shoreline management policies or standards.
1) Protecting a system of fish and wildlife habitats with connections between larger habitat blocks and open spaces and restoring such habitats and connections where they are degraded;
2) Protecting existing and restoring degraded riparian and estuarine ecosystems, especially salt marsh habitats;
3) Establishing adequate buffer zones around these areas to separate incompatible uses from the habitat areas;
4) Protecting existing and restoring degraded near-shore habitat;
5) Protecting existing and restoring degraded or lost salmonid habitat;
6) Protecting existing and restoring degraded upland ecological functions important to critical saltwater habitats, including riparian vegetation;
7) Improving water quality;
8) Protecting existing and restoring degraded sediment inflow and transport regimens; and
9) Correcting activities that cause excessive sediment input where human activity has led to mass wasting.

17.35.034 Buffer Requirements for Protection of Lacey’s Marine Riparian Areas and Saltwater Habitat as Appropriate

1. Buffer requirements for marine riparian areas and for critical saltwater habitat where appropriate as identified in a habitat management plan:

A. Policy: Buffers will be designed to protect critical area and achieve no net loss of function and value. Buffers shall be based upon the best available science and, when available, site specific recommendations of the Department of Fish and Wildlife and other state agencies with expertise in relevant areas.

B. Policy: Buffers for all critical saltwater habitats with riparian areas will be identified in the management plan, will be designated around the critical area and will have a depth adequate to protect the identified functions and values of the critical area. This may overlay the setback from the OHWM or be independent and in addition to, depending upon the needs for protection and intent of the buffer.

C. Policy: Buffers are expected to be variable, designed in consideration of the unique site features of the critical area and the specific values and functions being protected. However, a minimum baseline for a critical area buffer associated with marine riparian habitat shall not be less than the distance applied to Lacey’s fresh water riparian area of Woodland Creek, which is 200 feet.

D. Policy: The buffer applied to a marine riparian area or critical saltwater habitat area designation may accommodate appropriate public access opportunities. Provided, the planned public access is consistent with the intent and applicable provisions of Lacey’s Public Access Plan and it is approved and maintained by the City of Lacey.
17.35.035 Fundamental Standards Applying to all for Protection of Critical Saltwater Habitat and Marine Riparian Habitat

1. **Standard:** Docks, bulkheads, bridges, fill, floats, jetties, utility crossings, and other human-made structures shall not intrude into or over critical saltwater habitats or marine riparian habitat or associated buffers except when all of the conditions below are met or it is designed for public access and meets the requirements of Section 17.35.034 1. D. regarding public access and consistency with the City Public Access Plan:

   A. The public’s need for such an action or structure is clearly demonstrated and the proposal is consistent with protection of the public trust, as embodied in RCW 90.58.020;

   B. Avoidance of impacts to critical saltwater habitats by an alternative alignment or location is not feasible or would result in unreasonable and disproportionate cost to accomplish the same general purpose;

   C. The project including any required mitigation will result in no net loss of ecological functions associated with critical saltwater habitat;

   D. The project is consistent with the state’s interest in resource protection and species recovery; and,

   E. Private, non-commercial docks for individual residential or community use may be authorized provided that:

      1) Avoidance of impacts to critical saltwater habitats by an alternative alignment or location is not feasible; and

      2) The project including any required mitigation will result in no net loss of ecological functions associated with critical saltwater habitat.

17.35.0364 Buffer Requirements for Protection of Lacey’s Marine Riparian Areas and Critical Saltwater Habitat as Appropriate

1. Buffer requirements for marine riparian areas and for critical saltwater habitat where appropriate as identified in a habitat management plan:

   A. **Standard:** The minimum baseline marine riparian habitat area buffer shall be 200 feet measured landward from the OHWM. The Administrator may authorize reduction of the standard buffer under the conditions and through the process provided for in LMC 14.33 and incorporated into this SMP.

   A. **Policy:** Buffers will be designed to protect critical area and achieve no net loss of function and value. Buffers shall be based upon the best available science and, when available, site specific recommendations of the Department of Fish and Wildlife and other state agencies with expertise in relevant areas.
B. Policy: Buffers for all critical saltwater habitats with riparian areas will be identified in the management plan, will be designated around the critical area and will have a depth adequate to protect the identified functions and values of the critical area. This may overlay the setback from the OHWM or be independent and in addition to, depending upon the needs for protection and intent of the buffer.

C. Policy: Buffers are expected to be variable, designed in consideration of the unique site features of the critical area and the specific values and functions being protected. However, a minimum baseline for a critical area buffer associated with marine riparian habitat shall not be less than the distance applied to Lacey’s fresh water riparian area of Woodland Creek, which is 200 feet.

BD. Policy Standard: Activities and structures associated with water oriented public access opportunities may intrude into the buffer applied to a marine riparian area or critical saltwater habitat area buffers. designation may accommodate appropriate public access opportunities, provided, the planned such public access is consistent with the intent and applicable provisions of Lacey’s Public Access Plan, and it is approved and maintained by the City of Lacey, is the minimum intrusion necessary to support the authorized use, and the mitigation sequence is followed.
17.35.0367 Critical Area Fresh Water Riparian Habitat

1. Location and Type:
The critical area habitat in Lacey includes Woodland Creek, its floodplain, and an associated, almost continuous, stretch of wetland complex that connects and extends around portions of area lakes including Hicks Lake, Pattison Lake, and Long Lake, to the extent such areas fall within shoreline jurisdiction, and the lake basins. See Map L-1 within the inventory.

2. Shoreline Designation: As discussed in Section 17.20.075, the shoreline residential designation has been applied to properties around Lacey’s lakes where residential development has occurred. These areas are predominately built out. It is the intent of this SMP to stabilize these areas by application of reasonable standards designed to protect environmental functions and values and to accomplish restoration of these areas over the long term. Woodland Creek is designated Urban Conservancy and Natural, and the large, associated wetland complex connecting them all is designated natural. Protection of the vast complex of wetland areas surrounding Hicks, Pattison, and Long Lake has come naturally as it was considered unusable. Most all of this complex has been protected and remains undeveloped.

3. Land use:
Land use along Woodland Creek and lakes within Lacey and Lacey’s UGA is somewhat variable ranging from undeveloped land to low density residential, with some commercial land uses along Woodland Creek’s associated wetlands north of Martin Way. However, Most of Woodland Creek from this area-point north within Lacey and its UGA is undeveloped and has maintained critical area values and functions, particularly in regard to flood storage capacity and habitat associated with wetland areas. Where lakefront property contained developable area, it has generally been platted and developed with residential uses. Continuation of the residential uses and reasonable expansions are anticipated to continue to occur. This is a result of Lacey’s emphasis on environmental protection and adoption and enforcement of environmental legislation dating back to the early 1980s.

3. Local environmental legislation and protection:

A. Longstanding protection: Generally, areas designated as critical area have had long standing protection under various ordinances and most recently under GMA environmental protection legislation. The one exception is platted lots around lakes where wetlands are limited to a thin beachfront (sometimes only a few feet wide) and lots have developed in a residential capacity.

However, most areas with any significant amount of area designated as critical and most all of the large wetland complex in Lacey adjacent to the lakes have been protected and remain undeveloped. In addition, Lacey’s wetland ordinance requires dedication of wetland areas and buffers to the City for protection and preservation when adjacent property is developed.

B. Requirement for dedication of wetlands and buffers associated with development: The requirement for dedication of wetlands and buffers has led to a significant amount of wetland area and buffers in Lacey’s stewardship. This is expected to facilitate stated goals in the access management plan for eventual ownership and protection of the majority of designated critical area associated with the major wetland complex in the east and south of Hicks Lake.

Comment [CB1]: The changes to this section are recommended to delete unnecessary or repetitive information and to bring information from the following section about the shoreline designation into this section. This will result in formatting that follows the rest of the chapter.
C. Plans and ordinances providing protection for critical areas: Plans and ordinances with direct influence over the protection of these areas have included the Environmental Protection and Resource Conservation Plan, Lacey Tree and Vegetation Protection and Preservation Ordinance (LMC 14.32), Habitat Protection Ordinance (LMC 14.33), Wetland Protection Ordinance (LMC 14.28) and Environmental Policy Ordinance (LMC 14.24), as well as other planning legislation including the Comprehensive Land Use Plan and Zoning Code (LMC Chapter 16) adopted under GMA.

D. General success in protection of critical area functions and values: Buffers and standards in these regulations have been very successful in providing protection for the values and functions of these critical areas. A 200 foot buffer for Woodland Creek was put in place as early as 1992, as part of the Environmental Protection and Resource Conservation Plan developed under GMA.

17.35.037 Discussion, Protection of Critical Fresh Water Riparian Habitat

1. Discussion and intent:

A. Protection outside shorelines jurisdiction, generally: Standards for specific uses proposed relative to critical areas is addressed under sections of this SMP that deal with the specific use, activity or modification. Normally, in areas outside of shoreline jurisdiction all uses that adversely impact the value and natural functions of wetland areas are simply prohibited from locating within the critical area and its associated buffer. The same is true for designated habitat protection area that is generally dovetailed with requirements for wetland protection as these areas often overlap.

B. Protection generally easy when property not associated with lakes and developable upland property: In Lacey, protection of the vast complex of wetland resource area came naturally as it was difficult to develop and in most cases was considered unusable. While this is not necessarily the case for Woodland Creek, the majority of Woodland Creek within incorporated Lacey has the advantage of being under the ownership of Saint Martin’s University. Saint Martin’s corporate culture has historically had an emphasis on environmental protection with a deep respect for nature and its value.

C. Protection more complex when associated with lakes where residential use has been a preferred use: Protection of critical areas is more complex for areas along lakes falling under shoreline jurisdiction. Lakes often have shoreline with a shallow area qualifying for wetland status that is associated with a lot stretching to an upland area. Where there is dry upland area adjacent to a lake it has been considered a desirable area for residential development with upper end land values. This has had adverse impact upon opportunities to preserve or protect the resource in its natural state.

D. Competition between protection and residential use: Regulation of critical areas has been relatively easy where the property is basically unusable for the owner. However, lakefront property has been particularly popular for residential use based upon the natural recreation opportunities available and the desirable living experience it naturally provides. Where there has been the opportunity to plat developable property that has lakefront, there is competition between use of the resource for residential use and protection of its natural values.

E. Balance needed: Such property in Lacey has generally been platted for residential development and developed with a residence. In these cases, the shoreline has generally been subjected to active use and modification that has impacted the normal shoreline processes and likely had an adverse impact
on its functions and values. While use of lakefront property is an expectation under the SMA and this SMP, a balance needs to be struck that can provide opportunities for use of shoreline resources while protecting the functions and values that make them so precious.

F. Shoreline residential designation: As discussed in Section 17.20.075, the shoreline residential designation has been applied to properties where residential development has occurred. These areas are predominately built out. It is the intent of this SMP to stabilize these areas by application of reasonable standards designed to protect environmental functions and values and to accomplish restoration of these areas over the long term.

G. Strategy: As part of a strategy of balancing these competing interests, the shoreline residential designation, including those shoreline residential designated properties with small edge lake critical areas, has been designed to allow continuation of residential use and reasonable expansion subject to mitigation, restoration and no net loss of function and value.

H. Example challenge and restoration scenario: While the presence of a wetland a few feet in width along a typical residential lot is classified as a critical area, development of a residence on the lot and years of human habitation, modification and use have probably left the shoreline impacted. Lacey’s existing critical area ordinances were not designed to protect lakeside wetlands on residential lots where the wetlands and ecology have already been impacted. The ordinances were designed to protect critical areas from new development. As such they typically prohibit all development or activity in critical areas.

— The merging of shoreline regulations with GMA critical area protection requirements presents new challenges for us, but it also presents greater opportunities for improving the ecology in these areas. There is a demonstrated need to restore critical areas where development has already occurred along our lakes. The update to the SMP provides the opportunity to implement new strategies to accomplish these objectives.

— Restoration activities as described in Appendix 2 could have significant positive impacts to both the ecology of a developed site and use of the property by the landowner. Concepts and strategies tying further development of the site to mitigation and restoration would be expected to have benefits to both the community and public interests associated with shoreline resources and the property owner.

— On the other hand, simply prohibiting development outright on these already developed and impacted lots would accomplish little other than continuing the existing use with current associated impacts. This scenario would accomplish little in the way of restoration.

— To accomplish the objectives of restoration, new flexibility and ways of approaching critical area protection is needed for these areas. This SMP presents a number of strategies to accomplish these objectives.

17.35.038 Specific Management Goal and Policies for Protection of Critical Fresh Water Riparian Habitat
1. **Goal:** Achieve protection of Lacey’s critical freshwater riparian habitats and achieve no net loss of function or value and incremental restoration of impacted buffers over the long term in these areas. Strive for greater levels of ecological function in vegetation management areas over the long term.

A. **Policy:** Utilize the best available science recommendations provided in literature from state resource agencies when developing standards and reviewing habitat management plans for activities proposed within or adjacent to critical freshwater riparian habitat areas.

B. **Policy:** Utilize standards in Lacey’s critical areas ordinances and tree and vegetation protection legislation as incorporated into this SMP, as appropriate, to protect critical freshwater habitat areas and achieve no net loss objectives of this SMP.

C. **Policy:** Accommodate existing uses while achieving no net loss of functions and values with new development and implement mitigation strategies designed to improve the functionality of vegetation management areas.

D. **Policy:** Emphasize protection and no net loss of ecological function of critical freshwater habitat in the future under GMA and when considering future land uses in shoreline areas.

Policy: Areas of shoreline along Lacey’s lakes that have upland area that was developable have generally been developed with homes and this use is expected to continue over the long term. Emphasis shall be placed on ways of accommodating existing uses while achieving no net loss of functions and values and implementing restoration strategies designed to mitigate existing impacts to critical areas and improve the existing situation for all shoreline resources over the long term. This is considered a major emphasis and priority in implementation of this SMP.

C. **Policy:** Emphasis shall be for protection and no net loss of value and function of freshwater critical areas and riparian habitat as we move forward under GMA and future land use of shoreline areas. This shall be a fundamental baseline consideration when planning the use of land and associated activities and development within shoreline jurisdiction.

D. **Policy:** Where critical areas occur along designated critical freshwater habitat, a conservancy or natural shoreline designation, buffer requirements shall be based upon critical area buffer requirements standards identified in Lacey’s critical area ordinances as incorporated into this SMP. Exceptions to this policy are outlined in Section 17.35.020 (1) (C). Because of special needs, values and functions, critical areas will generally require a buffer larger than the general setback from the OHWM. However, this will depend upon the type and quality of the wetland and habitat, the values and functions that need protection and the particular shoreline designation in which it occurs.

E. **Policy:** Where critical areas occur within a shoreline residential designation, buffers will be applied consistent with setbacks from the OHWM for the primary and most intensive use of the property, which will generally be a residential structure and use. Setbacks will be as identified in Section 17.24.015, Table 4, provided requirements of 17.35.038 F., G., and H. are satisfied for water dependent uses that typically have setbacks less than a residential home.

F. **Policy:** Water dependent uses and A-use structures or modifications developed and maintained by the City of Lacey for supporting public access or such uses may should be approved-authorized uses within critical freshwater habitat, a-critical areas, critical area as...
G. Policy: Within the shoreline residential designation, a non-commercial, water-dependent use, structure or modification may be approved within a critical area or critical area buffer, provided it meets the standards of Section 17.35.029.

H. Policy: Provisions of this section (17.35.038) are supplemental to Lacey’s critical area ordinance standards and requirements. The City will utilize requirements of Lacey’s habitat, wetland, tree and vegetation and geologically sensitive area protection legislation (LMC Chapter 14.28, 14.32, 14.33 and 14.37), except as modified in this section, to protect fresh water riparian habitat resources and achieve no net loss objectives of this SMP.

17.35.039 Standards Specific to Critical Fresh Water Riparian Habitat

1. Uses, structures or modifications that are not water dependent or do not provide public access shall not be permitted within a critical freshwater habitat area or its critical areas or their buffers under any shoreline designation except as may be provided in this SMP for structures and uses owned and operated by the City of Lacey serving a necessary public interest.

2. A water dependent or public access use, structure or modification may be approved within a critical freshwater habitat area or its critical areas and their buffers provided it meets all of the following requirements:

   A. It is within the shoreline residential designation and Such use, structure, or modification is associated with a residential use on the same property, or if a public use is identified in the Comprehensive Plan for Outdoor Recreation or the Public Access Plan;

   or it is within any shoreline designation and it is associated with public access or other public use and it is owned and maintained by the City of Lacey;

   B. All requirements standards of this SMP applicable to the use, structure or modification are met including provisions in Part 2 and 3 of the SMP and use and standards (including setbacks) identified in Section 17.24.015, Tables 3, 4 and 5;

   C. The proposal is intrusion is the minimum amount necessary to support the authorized use and the proposal complies subject to with mitigation sequencing;

   D. The proposal can demonstrate no net loss of shoreline ecological function and value;

   E. The proposal meets the requirements of Section 17.41.021, Table 1, for vegetation and restoration of buffers; and

   F. The proposal, for activities within critical freshwater habitat areas shall includes development of a Habitat Management Plan pursuant to the requirements of LMC Chapter 14.33. The habitat
The management plan shall illustrate how the proposal complies with the goals, policies and standards relating to critical fresh water habitat areas and critical areas, as applicable, in this SMP.

Note: Items E. and F. may be used to mitigate and restore the site in order to demonstrate no net loss in item D.
17.41.000 Vegetation Management

17.41.010 Importance of Vegetation

1. Importance of vegetation - Native vegetation along the shoreline provides and supports many ecological functions or processes which are critical to the health, vitality, function and value of Lacey's shorelines. These functions and values include but are not limited to:

A. Providing shade necessary to maintain water temperatures required by salmonids, forage fish, and other aquatic biota.

B. Regulating microclimate in riparian and nearshore areas.

C. Providing organic inputs necessary for aquatic life, including providing food in the form of various insects and other benthic macro invertebrates.

D. Stabilizing banks, minimizing erosion and sedimentation, and reducing the occurrence/severity of landslides.

E. Reducing fine sediment input into the aquatic environment by minimizing erosion, aiding infiltration, and retaining runoff.

F. Improving water quality through filtration and vegetative uptake of nutrients and pollutants;

G. Providing a source of large woody debris to moderate flows, create hydraulic roughness, form pools, and increase aquatic diversity for salmonids and other species.

H. Providing habitat for wildlife, including connectivity for travel and migration corridors.

2. Action - Based upon identified functions and values and the role vegetation plays in maintenance of these functions and values, Lacey will promote proper restoration, landscaping and maintenance of its shoreline areas. The goals and polices in Sections 17.41.015, and the general development standards in Section 17.41.20 are intended to form the vision and general framework for this effort.

17.41.015 Vegetation Management - Goals and Policies

1. Goal: Over the long term, achieve vegetated shorelines with plants materials supportive of natural shoreline functions and values that will help maintain and improve water quality and habitat.

A. Policy: Limit the removal of vegetation along the within shorelines jurisdiction to the minimum necessary to accommodate the approved authorized shoreline development, and establish Designate a buffer vegetation management area of vegetation corresponding to each designation’s setback area for the most intensive use expected of the property, generally a residential uses...
outlined in Section 17.24.010, Table 4. To be providing buffering functions, it is assumed such areas are well vegetated with native species appropriate to the eco-region. Where buffering functions are compromised by loss of, lack of, or replacement of native vegetation, Vegetation Management Plans should focus on improving buffering function.

B. Policy: Native/approved vegetation is desired along the shoreline within designated vegetation management areas will be required to further the City’s goals of shoreline restoration and to promote no net loss of ecological function and value with new development. A Vegetation Management Plan should be and landscaping will be required. The plan should provide a balance developed for uses and activities proposed in shoreline jurisdiction, and should considering legitimate competing interests for shoreline areas. This will These interests include but are not limited to habitat, and views corridor opportunities as well as and compatibility and integration with of the full range of land use activities permitted and expected anticipated in the applicable shoreline classification environment and adjacent uplands. Example Vegetation Management Plans are provided in Appendix 2.

C. Policy: The Administrator may allow limited selective pruning of native/approved vegetation for view corridors and some limited vegetation removal clearing for shoreline access segments. Provided ecological functions are not compromised. The Proposals to remove vegetation for shoreline access segments activity shall follow the mitigation sequence. All proposals for vegetation removal or pruning should be reviewed by the City Forester/Arborist, who will provide a recommendation provided to the Administrator. Pruning activities do not require preparation of a Vegetation Management Plan. See Sections 17.41.020 (15) and 17.41.020 (10).

D. Policy: Preserve existing native vegetation along the shoreline, and require encourage and incentivize planting when it does not exist, and avoid, minimize and mitigate for impacts to shoreline vegetation.

E. Policy: Provide flexibility when balancing overlapping shoreline policies and priorities regarding vegetation conservation, a preferences for water-dependant uses, and requirements to provide public access.

F. Policy: When nonconforming or “conforming, expansion limited” structures are expanded within designated vegetation management areas. When remodeled structures are located too close to the ordinary high water mark and do not have room to install the normal vegetative native/approved vegetation does not exist within improvements in the designated buffer vegetation management area, the City should encourage will require planting with the installation of vegetation within these areas at the level of the site can reasonably accommodate and commensurate to offset the proposed level of expansion within the buffer area. In addition, if through review of the Vegetation Management Plan, the Administrator determines there is not adequate space onsite to accommodate vegetation that will adequately to offset and mitigate impacts anticipated from the expansion, that occur for lack of adequate vegetation buffering, the city Administrator may require a commensurate amount of vegetation on consider other offsite priority restoration areas mitigation or payment of fees in lieu of onsite mitigation.

G. Policy: Vegetation Management Plan development standards for the buffer shall apply to a new structure, to remodeled structures which add square footage, to the addition of an accessory structure, and any permit for a shoreline parcel(s) with waterfront access.
Policy: Intact native shoreline vegetation within designated vegetation management areas should be comprised of three vegetative levels including an overstory of trees, an understory of shrubs, and a floor of herbs and native plants commonly found in riparian areas of Thurston County; see example Vegetation Management Plans in Appendix 2.

Policy: When intact native shoreline vegetation is lacking, required such areas shall be planted to resemble native riparian vegetation conditions, or equivalent. The Administrator may consider and approve use of other vegetative materials that are demonstrated through the Vegetation Management Plan from the standpoint of to achieve protection or maintenance of shoreline ecological function, equivalent to native vegetation and value. To satisfy vegetation and restoration goals, trees are considered a high priority; see Table 1. In addition to a tree canopy, vegetation should also have an understory component of native plants commonly found in riparian areas of Thurston County or of benefit to lake shoreline in Lacey; see example Vegetation Management Plan in Appendix 2.

Policy: A Shoreline Vegetation Management Plan shall address shoreline function and values. Where uses or activities are proposed along shorelines that also contain this involves critical areas, the Vegetation Management Plans may be consolidated with a required Habitat Management Plans required under Section 17.35.

Policy: Vegetation conservation development standards shall not apply to the removal of aquatic weeds and fresh water algae undertaken pursuant to WAC 173-201.

Policy: Additional tree regulations and policy can be found in Chapter 14.32 of the Lacey Municipal Code and Lacey’s Urban Forest Management Plan. Per Section 17.35.010, the more restrictive development standard applies.

Policy: The City of Lacey Critical Area Ordinances, including the ordinances for the protection of habitat and wetland areas, requires vegetation along a shoreline or wetland. These requirements will overlay those found within this section. Per Section 17.35.010, the more restrictive development standard applies.

Comment [CB3]: This section reflects required changes outlined in Appendix B.

Comment [CB4]: It is suggested that these policies be moved elsewhere in this section.
Cyanobacteria algae bloom in another community in Spanaway Lake caused by surrounding urbanization and its related drainage impacts and use of septic tank drainfields. This contamination is becoming a major problem in nearby Pierce County communities. This particular species is highly toxic to wildlife and humans producing a very potent liver toxin that will kill dogs and wildlife after just a couple of drinks. It is also toxic to humans and is a danger just from contact with your skin. Health departments post warning signs where these blooms occur to keep humans away from the water. The pollutants that head the list leading to Cyanobacteria blooms are nitrogen and phosphorous.

To avoid the situation pictured above, it is critical to maintain existing native vegetation and restore natural vegetation in designated buffer areas along our shorelines. Positive drainage features like rain gardens can filter and clean runoff before entering the adjacent water body.

Lacey lakes have not yet faced this problem, and Lacey is working very hard to maintain our healthy water resources. Landscaping requirements are part of this effort and are designed to prevent the type of situation displayed in this picture for the benefit of shoreline property owners as well as the larger community.

*Picture taken by Don Russell.*
2. **Goal:** Develop landscaping guidelines that will achieve goals for restoration and that are useful for property owners and will encourage and promote ecological friendly property management.

   **Policy:** Utilize the stated goals and policies for each of the different shoreline use and activities sections to explain to citizens the reasons for the regulations.

   **Policy:** Develop and provide examples of landscaping strategies and plans citizens can use to implement important concepts on their own property.

23. **Goal:** Develop and implement a public informational efforts that will put shoreline vegetation restoration and management **guidelines**, in the hands of shoreline property owners.

   **Policy:** Because of the importance of native vegetation in managing water quality, the City shall promote public education on this topic and help inform citizens of the purpose and need for retention/planting/restoration of shoreline area to perform natural drainage mitigation.

   **Policy:** Develop a full range of techniques/materials for informing to share with the public ranging from how to implement of shoreline revegetation requirements in accordance with this SMP as well as to basic information regarding shoreline functions and values and how vegetation management can be involved in an ecologically friendly way of maintaining shoreline property.

   **Policy:** The City will support efforts of realtors and work in partnership with the local Board of Realtors to inform new and existing shoreline lot property owners of requirements of protective covenants that may be applicable to shoreline properties, and on the topic of proper ecologically friendly vegetation management. This may include a range of strategies such as educational presentations at realtor membership meetings, presentations to homeowner associations, scheduling informational meetings with lot owners or perspective buyers and helping to develop brochures for general circulation to interested groups.

17.41.020 **Vegetation Management - General Development Standards for Vegetation Management**

1. **Vegetation Management Plan required when Standard:** A Shoreline Vegetation Management Plan shall be developed and implemented for any shoreline parcel as a requirement of a shoreline substantial development permit, shoreline conditional use permit, shoreline variance and any action requiring an exemption letter. **If there is no permit or exemption letter required for an activity, structure or use, a Shoreline Vegetation Management Plan is not required. However, in such situations any new landscaping of the site must adhere to the goals, policies and standards of the SMP with regard to and the intent to promote natural functions and values of shoreline property.** **See New landscaping of shoreline property shall follow guidelines in Appendix 2 for sample Vegetation Management Plans for green shoreline.**

   Parcels within shoreline jurisdiction which do not front onto a lake or stream and have property within a required shoreline buffer shall still be required to develop and implement a Shoreline Vegetation Management Plan pursuant to requirements of this section. Said plan will have a different focus than lots with shoreline frontage. Focus for these parcels will be runoff and drainage treatment, overstory vegetation to promote tree canopy and proper maintenance, involving use and minimizing fertilizers and other contaminants that could impact water quality.
2. Vegetation Management Plan not required when: If there is no permit or exemption letter required for an activity or structure, a Shoreline Vegetation Management Plan is not required to be developed and the thresholds and requirements of Table 1 shall not apply. However, any new landscaping of the site must adhere to the goals, policies and standards of the SMP and the intent to promote natural functions and values of shoreline property. New landscaping of shoreline property shall follow guidelines in Appendix 2 for green shorelines.

2A. Vegetation Management Plan generally Standard: The Shoreline Vegetation Management Plan will provide detail to shall include or address the following components:

A. The plan shall cover the entire project area or parcel(s) upon which uses or activities requiring authorization are proposed, as outlined above that area from the ordinary high water mark to the edge of the required setback based upon the most intensive use expected for the property; see example Vegetation Management Plan in Appendix 2. The plan shall illustrate the location of the OHWM, the dimensions and location of the vegetation management area and of any shoreline access segment or clear zone established under Section 17.41.020 (7). The plan shall also illustrate the contours and general slope of the lot, the dimension of all existing and proposed structures (principle and accessory), impervious surfaces, lawn or turf areas, easements, and utility lines/connections. The plan shall illustrate general areas, approximate dimensions, and species makeup of vegetated areas located on portions of the subject site within shoreline jurisdiction but outside of the designated vegetation management area. Where combined with a Habitat Management Plan, the combined plan shall also illustrate the location and type of critical area(s) existing on the site in accordance with the provisions in Section 17.35 of this SMP. This plan shall be prepared by a licensed landscape architect, Washington certified nurseryperson or Washington certified landscape professional. When combined with a Habitat Management Plan, the plan shall also incorporate information from a qualified biologist or ecologist. The Administrator may waive the requirement for a qualified professional to prepare the plan, under appropriate circumstances as determined by the Administrator.

B. The plan shall provide for the retention and/or replanting of native shoreline vegetation, or its functional equivalent, within the required vegetation management area to support natural functions; see example Vegetation Management Plans in Appendix 2. When expansion of a nonconforming structure, “conforming, expansion limited” structure, or development of a nonconforming lot is proposed within the vegetation management area, or when the impacts of development outside of the vegetation management area cannot be offset because of insufficient native vegetation in the vegetation management area, vegetative improvements (replanting) proposed to offset unavoidable impacts through the mitigation sequence shall be provided according to the schedule and tier threshold provisions in Section 17.41.021, Table 1.

C. Authorized uses or development shall retain all vegetation occurring on the lot until such time as a building permit or shoreline authorization is issued. Such permit or authorization shall specify the extent to which and in what locations vegetation can be removed. Development occurring outside of vegetation management areas will generally satisfy the first step in the mitigation sequence (avoidance). If, in the opinion of the Administrator, the use or activity may still result in a net loss of shoreline ecological function due to the character of the proposed activity or because of specific site conditions, the Administrator may require compensatory mitigation commensurate to offset identified impacts.
Thresholds described in Table 1 for development thresholds triggering improvements are considered a mandatory baseline for plan development. However, specific improvements and revegetation strategies employed that are developed to meet objectives of this SMP may differ from those of the in Table 1 provided they are proportionate to and provide for equivalent levels of shoreline functions to accomplish the same objectives as those listed in the table.

The Administrator may waive the requirement provisions of said for preparation of a Shoreline Vegetation Management plan when the proposed permit or action seeks to improve ecological functions of the shoreline, such as the removal of a bulkhead. In this situation, if provisions are the level of functional improvement waives they should be proportionate to that which would be provided through implementation ecological value gained of a Vegetation Management Plan, as determined by the Administrator.

Example Vegetation Management Plan: To aid applicants in preparation of a Shoreline Vegetation Management Plan, the City has provided a couple of example Vegetation Management Plans and a general list of preferred species for Lacey’s shoreline areas; see Appendix 2. Species listed in Appendix 2 have been selected based upon characteristics that contribute and support the natural functions and values of the shorelines. The example plans shall be designed to help guide utilized by applicants to achieve mitigation and restoration efforts unless an alternative approach is authorized by the Administrator utilizing the criteria outlined 17.41.020 (D) above that will promote superior shoreline health by improving water quality and habitat function.

Example plans are guidelines: The example plan(s) in Appendix 2 should be considered options and will not prohibit an applicant from development of a Shoreline Vegetation Management Plan that is different provided the plan meets applicable City and state standards and functionality. Plans must be designed with intent for achieving restoration and mitigation goals related to drainage, habitat and other identified concerns applicable to the subject site.

Review of Vegetation Management Plan: The Shoreline Vegetation Management Plan shall be reviewed by the City Arborist and Tree Protection Professional who shall utilize guidance from the Department of Fish and Wildlife and the information in Appendix 2 to determine evaluate preferred and proposed species and functional needs. The Arborist/Tree Protection Professional shall consult the Shoreline Inventory, Characterization and Analysis based upon characteristics and criteria Reports for information on shoreline functions and values relative to the individual shoreline and subject reach where activities are proposed. Based upon the review, he/she shall provide recommendations to the Administrator for action on the plan. Only plans that do not support protect and mitigate for impacts to the shoreline ecological functions and values and can be expected to obtain results comparable to concepts illustrated and provided in Appendix 2 can will not be approved.

Standards for Maintenance component: Each Shoreline Vegetation Management Plan shall contain a maintenance component that details water quality maintenance requirements. This should include proper use of fertilization-fertilizers, to reduce impacts to water quality, irrigation needs and responsibilities, and adaptive management requirements to guarantee implementation of the plan. The intent is to prevent serious water quality problems as illustrated in the photograph in Section 17.41.015.
58. **Standards to Ensure Maintained through easement Retention:** Each Shoreline Vegetation Management Plan shall be maintained-retained and implemented over-throughout the life of the use and/or development by means of a conservation easement or similar legal instrument recorded with the Thurston County Auditor, prior to issuance of a permit or exemption.

69. **Standards for Limitations on Use of Lawn as Landscaping:** Lawn or turf is generally not permitted within the designated buffer-vegetation management area because it compromises the buffering effectiveness of the buffer area and does not serve a buffering function and values. Turf also generally encourages fertilization, which can result in an increased nutrient load to the water body and compromising water quality. Turf shall only be permitted within the vegetation management area in the following situations and must be when approved by the Administrator:

A. When expansion of an existing nonconforming or "conforming, expansion limited" structure is authorized, or when construction on a nonconforming lot involves encroaching into a designated vegetation management area, in the portion of the yard-vegetation management area within a 10 feet distance to a of the structure, as allowed pursuant to Section 17.41.020 40(7), may include or remain turf. New development shall apply the mitigation sequence to avoid conflicts with vegetation such that this clear zone for turf or lawn within the vegetation management area is not needed, to the extent feasible.

B. When new construction is proposed, turf shall not be utilized in the designated vegetation management area. However if the Administrator determines there is no reasonable alternative that provides the applicant with usable yard space, lawn or turf may be utilized within up to 10 feet of the structure within the vegetation management area. The Administrator shall review the proposal utilizing the variance criteria in Section 17.30.020 and shall only approve such requests utilizing the mitigation sequence and when the allowance is the minimum necessary to afford relief.

C. Wherever lawn is permitted, it must meet requirements of Section 17.41.020 2-(4) concerning proper use of fertilization.

710. **Standards for Shoreline Access Segments and Clear Zones:** Permitted around permitted structures: Permitted-nonconforming or "conforming, expansion limited" structures proposing to expand structures may have maintain non-buffer related vegetative improvements adjacent to and within a 10 foot radius of the structure (clear zone) to prevent conflicts between native vegetation and the structure. As outlined above, new residential construction shall be sited so that any lawn or turf area is located outside of the vegetation management area, to the extent feasible. New residential uses on shoreline parcels may establish a shoreline access segment as defined in 17.15.236. In locating shoreline access segments or locating clear zones, the Compensation mitigation sequence must be provided-followed. Compensatory mitigation shall offset directly impacts from the structural expansion as well as from any resulting loss of function due to expansion of the clear zone further into the vegetation management area, if applicable area of non-native vegetative improvements. Compensatory mitigation shall also be provided for unavoidable impacts resulting from the establishment of shoreline access segments.

Comment [CB8]: Changes to this section are suggested to incorporate the shoreline access segment concept/allowance.
Compensatory mitigation shall be authorized by the Administrator and may include a range of toolbox alternatives including such things as:

A. Additional vegetative improvements in other areas of the buffer portions of the vegetation management area, as outlined in Table 1;

B. Strategies designed to provide more effective buffering functions within the vegetation management area, such as installation of a rain garden that is particularly effective in mitigating runoff impacts;

C. Restoration activity that improves the existing function and value of the shoreline in ways other than installing vegetation, as outlined in Table 1. Such activities may include removing overwater structures that do not provide public access or serve a water dependent use, replacing materials on docks with light penetrating materials, or removing hard shoreline stabilization structures where softer measures would provide adequate shoreline stabilization;

D. Other strategies or techniques designed to provide functions proportionate to and to compensate for area of the buffering functions within the vegetation management area that are lost, as approved by the Administrator.

11. Conforming limited expansion homes: For existing homes that do not meet the setback distance from the OHWM, the following guidelines apply when permits or a letter of exemption is required:

A. A landscaped area meeting the requirements of Section 17.41 shall be established from the ordinary high water mark to within 10 feet of the existing structure. Mitigation and restoration efforts should apply enhanced vegetative concepts necessary to compensate for the reduced buffer area with the intent of achieving similar results expected of a site with a full buffer area of native vegetation.

B. In situations where the reduced buffer area and site circumstances and constraints would prevent enhanced landscaping options necessary to achieve restoration goals similar to a site with a full buffer, the applicant may utilize other toolbox mitigation techniques approved by the City, including:
   1) Compliance of buildings and accessory structures such as bank stabilization structures with current standards;
   2) Off-site mitigation after exhausting onsite opportunities pursuant to items C. through F. below.

C. Once If reasonable effective opportunities for vegetative restoration compensatory mitigation have been exhausted onsite, off-site mitigation may be conducted applied at priority restoration sites as determined by the City of Lacey Administrator. At such time as the City has designed and implemented a fee in lieu of program, this may be accomplished by paying a fee in lieu of additional onsite mitigation shall also be an option at the sole discretion of the Administrator.

D. Said fee will be placed in a fund specifically established for restoration activities at sites designated a priority by the City.

E. Use of said fee in lieu of option shall be at the sole discretion of the City.
8F. Sites that do not meet on site landscaping mitigation/restoration area requirements may be denied permit requests.

12. Standards for Covenants for New Plats to detail management objectives: Protective covenants and articles of incorporation for new plats shall include discussion of the location of and required maintenance for designated vegetation management areas. The discussion shall include the responsibilities of the homeowners association to call the attention of residents to inform its residents policies and standards in this SMP of good water quality and landscaping practices and issues. It shall also detail the responsibility of individual lot owners to follow prescribed rules in regard to preservation maintenance of vegetation and appropriate vegetation maintenance practices to preserve water quality.

913. Responsibilities for parcels not adjacent to shoreline: Parcels within shoreline jurisdiction which do not front onto a lake or stream and have property within a required shoreline buffer shall still be required to develop and implement a Shoreline Vegetation Management Plan pursuant to requirements of this section. Said plan will have a different focus than lots with shoreline frontage. Focus for these parcels will be runoff and drainage treatment, overstory vegetation to promote tree canopy and proper maintenance, involving use and minimizing fertilizers and other contaminants that could impact water quality.

14. Standards for Hazard trees: Hazard trees within a required area of native shoreline vegetation or a critical area buffer may be converted to habitat tree, thinned or pushed over toward the aquatic area to be and retained as large woody debris. Such proposals shall be reviewed and recommended by the City’s Tree Protection Professional and approved by the Administrator in accordance with the process for hazard tree review in LMC 14.32 as incorporated into this SMP.

105. Standards for Limbing of Trees may be approved: The limbing or crown thinning of trees larger than three (3) inches in caliper shall comply with National Arborist Association pruning standards, unless the tree is a hazard tree as defined by the Lacey’s Tree Protection and Preservation Ordinance (LMC 14.32) and applicable policies and adopted criteria of the Lacey Urban Forest Management Plan, as incorporated into this SMP.

K11. Policy Standard: Requirements of this SMP to maintain and conserve vegetation conservation development standards shall not apply to the removal of aquatic weeds and fresh water algae undertaken pursuant to WAC 173-201.

L. Policy: Additional tree regulations and policy can be found in Chapter 14.32 of the Lacey Municipal Code and Lacey’s Urban Forest Management Plan. Per Section 17.35.010, the more restrictive development standard applies.

M. Policy: The City of Lacey Critical Area Ordinances, including the ordinances for the protection of habitat and wetland areas, requires vegetation along a shoreline or wetland. These requirements will overlay those found within this section. Per Section 17.35.010, the more restrictive development standard applies.
Exhibit C

View of a backyard along the north side of Chambers Lake. Notice the storm drain located in the foreground. While the situation provides a serene environment for residents, drainage into the lake and cultivation of lawn is a real threat to the quality of our water and the health and productivity of shoreline resources. Lawns also encourage geese by providing an area free of predators and has led to many complaints because of the mess visiting geese can create. Proper Native landscaping can provide an attractive setting for residents, a healthier shoreline and will also discourage geese. New standards require healthier functional and productive landscaping designs with indigenous species and limit discourage the utilization of grass.
17.41.021—Table 1: Vegetation Management - Landscaping, Re-vegetation and Mitigation Schedule and Restoration Improvement Guidelines Tiers

1. Table 1 is considered a guideline for improvements with specific standards for threshold of development and performance:

   The following table is referred to as a guideline, because mitigation and restoration may involve a myriad of activities and landscaping designs that can meet the objectives of this SMP, the description of tiers/improvements given in this table should be used as a guideline. This Table 1 is intended to provide a basic framework for meeting objectives. The table shall and should be used as a benchmark when considering for performance expectations and thresholds provided in the table shall be considered standards for revegetation and mitigation, when necessary. However, these thresholds listed in this table are standards and shall be utilized in all Vegetation Management Plans.

   Improvements specified in the table, and example plans provided in Appendix B, can be used by applicants that prefer a standardized approach. As outlined in Section 17.41.020, applicants may also develop their own plan utilizing other strategies and “tool box” approaches, provided the plan incorporates the thresholds provided in the Table 1 and the plan meets the same objectives for functional equivalency and no net loss and restoration of shoreline ecological function. These thresholds and tiers/improvements are in addition to applicable requirements for revegetation of disturbed areas and landscaping in the Lacey Zoning Code.

<table>
<thead>
<tr>
<th>Level of Expansion/Action in the Vegetation Management Area</th>
<th>Thresholds*</th>
<th>Description of Tiers/Improvements* **</th>
</tr>
</thead>
<tbody>
<tr>
<td>No expansion permit – Permit associated with residential structure and no expansion; Electrical, plumbing, roofing permit, etc.</td>
<td>Not applicable.</td>
<td>Not applicable.</td>
</tr>
</tbody>
</table>
| Low Impact Expansion – Expansion with no increase in impervious surface or building footprint (vertical) | Tree and Tier One | • Tree Tier - Meet minimum tree requirements of LMC Chapter 14.32, as incorporated into this SMP. Required trees must be placed within vegetation management area.  
• Tier One – Provide a 10 foot strip of landscaped area with native plants in the vegetation management area. |
| Minor Expansion - Expansion of building footprint by up to 500 square feet or up to 10% of structure (whichever is less) OR Expansion of impervious surface by up to 1,000 square feet or up to 10% (whichever is less) | Tier Two | • Tier Two - Install native vegetation in at least 50% of the vegetation management area. Priority given to overstory vegetation along the shoreline.  
• OR  
• *Reduced Vegetation/Structure and Use Option - Install native vegetation in at least 25% of the vegetation management area. Priority given to overstory vegetation along the shoreline. AND, remove over water structures that do not provide public
2. Expectations for focus of Vegetation Management Plan:

   While a Vegetation Management Plan may not be the only requirement to meet objectives of no net loss, it will typically be a major component when dealing with improvements on individual lots. As such, it should have an emphasis on use and management of vegetation to achieve mitigation/restoration objectives of this SMP. This will include the following:

   A. No net loss of function and value related to the proposed expansion.

<table>
<thead>
<tr>
<th>Tier</th>
<th>Moderate Expansion</th>
<th>OR</th>
<th>Expansion of impervious surface by more than 1,000 square feet, or between 10.1 to 25% (whichever is less)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>OR</td>
<td>Tier Three - Install native vegetation in at least 80% of the vegetation management area. Priority given to overstory vegetation along the shoreline.</td>
</tr>
</tbody>
</table>
|      |                    | OR | Reduced Vegetation/Structure and Use Option: Install native vegetation in at least 50% of the vegetation management area. Priority given to overstory vegetation along the shoreline. AND, Replace solid surfaces on piers and docks with light penetrating surfacing materials.
|      |                    | OR | Install native vegetation in at least 50% of the vegetation management area. Priority given to overstory vegetation along the shoreline. AND, if applicable, do one of the following:
|      |                    |     | Remove over water structures that do not provide public access, or do not serve a water dependent use.
|      |                    |     | Remove and replace hard shoreline stabilization structures with bioengineered or softer shoreline stabilization measures. |

<table>
<thead>
<tr>
<th>Tier</th>
<th>Major Expansion – Expansion of the building footprint by more than 25%, or redevelopment (replacement/teardown) of existing structures involving more than 25% of the square footage of the existing structure, or all new construction on a nonconforming lot.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>OR</td>
</tr>
<tr>
<td></td>
<td>Expansion of impervious surface by more than 25%</td>
</tr>
<tr>
<td></td>
<td>Tier Four - Install native vegetation in 100% of the vegetation management area.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tier</th>
<th>New Development or expansion outside of the vegetation management area, where native vegetation within the vegetation management area is not sufficient to offset the impacts of development.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tree and Tier One</td>
</tr>
<tr>
<td></td>
<td>See row two above for description of tiers.</td>
</tr>
</tbody>
</table>
B. Mitigation/restoration to address impacts currently present from existing use of the property.

3. Expectations for mitigation and restoration:

A. To meet no net loss requirements, mitigation is required for all new impacts attributed to expansion activities. This may also include restoration activity, where mitigation options fall short of achieving objectives of no net loss.

B. Restoration is intended to address existing impacts occurring at a site that can be attributed to existing land use. The table is designed to provide restoration that is proportionate to the level of expansion. This is intended to provide a fair and equitable way of improving the health of the shoreline incrementally over the long term as properties develop and redevelop. This strategy also allows choice of toolbox strategies that meet the landowner’s/applicant’s needs and personal objectives.

4. When both a Vegetation and Habitat Management Plan are required:

If the property involves a critical area with a requirement for a Habitat Management Plan, the Vegetation Management Plan and its necessary components can typically be consolidated as part of the Habitat Management Plan.

<table>
<thead>
<tr>
<th>Level of Expansion/Action</th>
<th>Type of Requirement Applied*</th>
<th>Description of Improvement Requirements**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor permit – Permit associated with residential structure and no expansion; Electrical, plumbing, roofing permit, etc.</td>
<td>No landscaping requirement.</td>
<td>No landscaping, mitigation or restoration requirement.</td>
</tr>
<tr>
<td>Low Impact Expansion – Expansion with no increase in impervious surface (vertical)</td>
<td>Comply with Tier One (Basic landscaping) requirements</td>
<td>Basic Tree Requirements – Meet minimum tree requirements. Minimum number of required trees must be placed within buffer area between shoreline and structure. Tier One Requirement – Provide a 10 foot strip of landscaped area of native plants or species with comparable function and value, between shoreline and structure.</td>
</tr>
<tr>
<td>Minor Expansion – Expansion of building footprint by up to 500 square feet or up to 10% of structure (whichever is less)</td>
<td>Comply with Tier Two mitigation/restoration vegetative requirements</td>
<td>Planting of a native community, or species with equivalent value and function, of at least 20% of the area within the buffer between the shoreline and structure (generally 23’ of a 50 foot buffer). Priority given to overstory vegetation along the shoreline.</td>
</tr>
<tr>
<td>Dr. Expansion of impervious surface by up to 1,000 square feet or up to 10% (whichever is less)</td>
<td>Structure and Use Requirements: Remove over-water structures that do not provide public access, or do not serve a water</td>
<td></td>
</tr>
</tbody>
</table>

Comment [CB12]: If these are not truly requirements, I suggest that word not be used.
<table>
<thead>
<tr>
<th>Dependant Use</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moderate Expansion - Expansion of the building footprint by more than 50% square feet, or between 10.1 to 25% (whichever is less)</td>
<td>Comply with Tier Three mitigation/restoration vegetation improvements.</td>
</tr>
<tr>
<td>Major Expansion of a conforming use and structure or new construction: Expansion of the building footprint by no more than 25%, or redevelopment (replacement/teardown) of existing structures involving more than 25% of the square footage of the existing structure, or new construction on an undeveloped lot.</td>
<td>Full compliance required with development standards. Applies to all structures including, but not limited to, the residence, accessory buildings, docks, shoreline enhancing and shoreline stabilization structures if such structures are not otherwise permitted by the provisions of LMC’s Shoreline Master Plan.</td>
</tr>
<tr>
<td>Expansion of a nonconforming structure or residence designated conforming limited expansion.</td>
<td>Compliance with vegetation requirements and structure and use requirements for the applicable category of expansion identified in the chart related to level of expansion. Additional mitigation and restoration based upon the review of specific issues related to identify public interest impacts described in section 17.25.010 and 17.25.020 and policies and standards of Section 17.40, 17.41 and 17.42.</td>
</tr>
<tr>
<td>Criteria:</td>
<td>The administration must be able to make the following findings that:</td>
</tr>
<tr>
<td>In some cases this may be accomplished through mitigation of identified impacts</td>
<td>The expansion does not result in a net loss of ecological function or value.</td>
</tr>
</tbody>
</table>
Exhibit C-4: Continuation of Recommended Change "QQ"

and provision of additional vegetation, removal of accessory nonconforming structures, or providing special value to the public, such as provision of a shoreline public access.

That the expansion will result in some increased public benefit compared to the existing situation.

* Requirements may vary according to the following considerations:

- A nonconforming structure, or a residence designated conforming limited expansion, will follow the same basic guidelines shown in the table, but will be required to have a threshold for improvements at 10% of the project value and will include special mitigation conditions related to specific public interests impacted.
- Where a property has been fully landscaped with qualifying vegetation and meets all other requirements of the SMP, no additional landscaping will be required.
- Credit will be given for participation in weed control provided the property also practices landscaping strategies that do not contribute to weed growth (this does not include standard herbicide use). Credit will be proportionate to the investment made in weed control and the relative priority that should be given to weed control considering the existing condition of property being developed. Restoration funding must follow the adopted priorities.

** Vegetation used should include is from approved landscaping native varieties or approved alternatives. For trees, preferred species are listed in select from the Lacey’s General Tree List in Lacey’s Urban Forest Management Plan or Appendix 2. For shrubs and ground cover types, preferred species are listed in select from Appendix 2. Functionally equivalent alternative varieties may be approved by the City Arborist Administrator.

The Administrator may grant additional credit for certain activities such as weed control as outlined in the footnotes above, and reduce required landscaping. Such reductions will be dependent on the scope of the proposed expansion, site conditions, and shall be at the sole discretion of the Administrator.
17.46.000 Access (Public) - Goals and Policies

1. **Goal:** Provide a full range of shoreline access and use for the Lacey community.

2. **Goal:** Require public access to and along the shorelines pursuant to the requirements of state law, guidance provided in the City Public Access Plan (see Appendix 1) and the goals and policies of this SMP.

3. **Goal:** Increase the ability of the general public to reach, touch, and enjoy the water's edge, to travel on the waters of the state, and/or to view the water and the shoreline from adjacent locations, provided that private rights, the public safety, and shoreline ecological functions and processes are protected consistent with the U.S. and state constitutions, and state statutes.

   A. **Policy:** Consider the type of public shoreline access that is needed for the Lacey community; passive, active, view points, beach recreation etc. Determine what access opportunities exist and what additional opportunities should be pursued based upon value to the public.

   B. **Policy:** Develop an inventory of existing public access to shorelines and potential opportunities for public access that Lacey could pursue in achieving its public access goals.

   C. **Policy:** To support implementing efforts, particularly regulatory actions of conditioning permits, include a discussion of SMP identified public access needs and opportunities in planning documents (The Comprehensive Land Use Plan, The Comprehensive Plan for Outdoor Recreation, and The Capital Facilities Element) with justification and expectations for acquisition and development.

   D. **Policy:** Consider a range of strategies and programs to acquire valued public access sites.

   E. **Policy:** Actively pursue public access opportunities with a variety of special programs;

   F. **Policy:** Where appropriate, acquire access to publicly owned tidelands and shorelands. Encourage cooperation among the City and Thurston County, adjacent cities, landowners, developers, other agencies and organizations to enhance and increase public access to shorelines as specific opportunities arise.

   G. **Policy:** Provide and protect visual access to shorelines and tidelands.

   H. **Policy:** Shoreline development by public entities such as local governments, state agencies, and public utility districts should provide public access measures as part of each development project unless such access is shown to be incompatible due to reasons of safety or impacts to the shoreline.

   I. **Policy:** Physical or visual access to shorelines should be incorporated in all new development when the development would either generate a demand for one or more forms of such access, and/or would impair existing legal access opportunities or rights. Public health and safety concerns should also be adequately addressed and maintenance of shoreline ecological functions and/or processes should be assured.

4. **Goal:** Develop innovative program(s) to achieve Lacey's public access goals with incentives attractive to the development community.

---

Comment [CB1]: Recommend deleting because it duplicates the next policy.
A. Policy: Craft incentive programs to gain needed public access opportunities that should provide a development option that is superior for the shorelines considering in balancing environmental protection and public use/interest, should meet all requirements of the Shoreline Management Act and furthers its spirit and intent, and should be superior from a market and business standpoint and result in a developer's independent decision to pursue the program.

B. Policy: Develop program strategies that offer opportunity for the developer that is superior from a market and business standpoint and will result in a developer's independent decision to pursue the program opportunity.

BC. Policy: Any development resulting from an incentive program should be compatible with and further the intent of GMA plans, the concepts the and the City's is emphasizing in implementation of GMA, and its community vision, and result in development that is compatible with and complementary to the neighborhood in which it is located.

D. Policy: Any development that results from an incentive program needs to be compatible and complementary to the existing neighborhood in which it is located.

E. Policy: Innovative approaches and unique ideas should be encouraged to find ways to make preferred concepts work. Flexibility in general code standards should be permitted with an emphasis on design for compatibility with surrounding developments and functionality considering livability and improvements to a resident's quality of life.

5. Goal: Design and construct public access is designed and constructed so that it preserves or enhances the characteristics and natural functions and values of the shoreline.

6. Goal: Establish a shoreline access program that compliments the need for shorelines protection and recovery and restorative planning.

A. Policy: Lacey will manage shoreline access opportunities consistent with the emphasis to protect and improve the identified functions and values of our shorelines.

BA. Policy: Public access should be located, designed, managed and maintained in a manner that protects shoreline ecological processes and functions as well as the public health and safety.

BC. Policy: When applying conditions for public access, Lacey will select public access sites appropriate to the shoreline designation, the requirements for its environmental protection, and the maintenance of its natural functions and values.

CD. Policy: Site evaluation of sites for public access should include an analysis of the site's potential to accommodate the improvements, requirements necessary for the proposed form and level of intensity of various public access activities.

DE. Policy: Public access facilities such as over water fishing piers may be developed over water should only be authorized if ecological impacts are mitigated, if it is consistent with the intent of this SMP, and if it demonstrates no net loss of ecological function and value.

Comment [CB2]: Combination of the policies in this section is suggested to delete repetitive language, to reduce the volume of the document, and for clarity and readability. Policy E is suggested for deletion because it is vague and repeats information given elsewhere in this Section.

Comment [CB3]: Deletion of goal 6 is suggested because it restates Goal 5. All of the policies associated with goal 6 relate to both goals, so are recommended to be placed with goal 5.

Comment [CB4]: The deletion of this policy is suggested because it is duplicative of policy B.
**Policy:** Design of and development of public access facilities within shoreline jurisdiction shall consider view corridors. Emphasis shall be placed on consideration of neighboring views and existing views from surrounding properties.

6. **Goal:** Implement a shoreline access strategy that meets City of Lacey shoreline access goals needs through permit administration to achieve its shoreline access goals while being sensitive to needs of landowners, surrounding neighborhood residents, and the general public.

A. **Policy:** Lacey will demonstrate need for an access to provide the applicant a reason, purpose, and justification for public access as discussed in Appendix 1.

B. **Policy:** Lacey will provide the applicant with the use and intended design of the public access and assure successful integration of the access with the applicant’s goals and objectives.

C. **Policy:** Lacey will increase public access to publically owned shorelines.

D. **Policy:** Lacey will consider objectives of private projects and landowners as it develops plans for public access and as much as possible, without compromising Lacey's public access goals and goals of the state, will design the access and long term management in a way that accomplishes the objectives of both parties.

E. **Policy:** Public access developed as part of a shoreline permit requirement should be designed to enhance the proposed project by adding value to the property for current and future residents of the site/ownership/development. Ideally, the relationship should be considered a partnership between the developer and the city, where the establishment of public access tied into other public amenities (regional trail, lake trail, parks etc.) will improve a project’s marketability and attractiveness, adding value to the proposed development by establishing an amenity residents of the site/ownership/development will see as added value to their home.

F. **Policy:** Physical or visual access to shorelines should be required as a condition of approval for shoreline development activities commensurate with the anticipated needs of future residents or users of the development, impacts of such development, and the corresponding benefit to the public, and consistent with constitutional limitations. Use an incentive dedication agreement program, such as Section 17.46.025, to provide economic incentives for a developer to design projects that include dedication of shoreline areas and access to the public.

G. **Policy:** Public access area and/or facility requirements should be commensurate with the scale and character of the development and should be reasonable, effective and fair to all affected parties, including but not limited to the land owner and the public.

H. **Policy:** Design review standards should be applied to all projects taking place within shoreline jurisdiction. All projects should meet community expectations detailed in the Comprehensive Land Use Plan for neighborhood form and functionality and be compatible with and complementary to existing and planned development.

I. **Policy:** Public access design should provide for public safety, minimize potential impacts to private property and individual privacy, and protect shoreline ecological functions and processes.

Comment [CBS]: This incorporates a required change outlined on Exhibit B-1.
J. **Policy:** Public access should be designed for integration with the existing built environment. In the context of a shoreline environment, successful integration will necessitate context sensitive design and will provide value to shoreline land owners, surrounding residents and the general public.

78. **Goal:** Achieve public access opportunities that are sensitive to the needs of water dependent uses and reflect priorities of the state for use of shorelines.

A. **Policy:** Public access should be designed and managed in a manner that ensures compatibility with water-dependent uses.

B. **Policy:** Public access should be provided for water-oriented enjoyment, water-related, and non-water-dependent uses and subdivisions of more than 4 lots, and for all developments that increase public use of the shorelines and public aquatic lands, or that would impair existing legal access opportunities as provided in/supported by the City's Public Access Plan.

C. **Policy:** Uses and developments that provide an opportunity for substantial numbers of the people to enjoy the shorelines of the state are a preferred use.

D. **Policy:** Nonwater-oriented uses or activities located on the shoreline should provide public access as a public benefit.

9. **Goal:** Achieve public access opportunities that are compatible and complimentary to existing and planned development and that provide value to shoreline land owners, surrounding neighborhood residents and the general public.

A. **Policy:** Develop and manage public access to prevent adverse impacts to adjacent shoreline properties and developments.

B. **Policy:** Apply design review standards to all projects taking place within shorelines jurisdiction. Through review of design, ensure all projects meet community expectations detailed in the Comprehensive Land Use Plan for neighborhood form and functionality. In the context of a shoreline environment, this requires protection and preservation of sensitive shoreline resources and provision of appropriate public access integrated into the surrounding neighborhood area. Successful integration requires context sensitive design providing value to shoreline land owners, surrounding residents and the general public.

C. **Policy:** Public access design should provide for public safety, minimize potential impacts to private property, individual privacy, and protect shoreline ecological functions and processes.

40. **Goal:** Achieve Lacey's identified public access goals using strategies, methodology and targets established in the Lacey Public Access Plan; see Appendix 1.

9. **Goal:** Achieve safe and respectful use of lake resources by partnering with lake residents and Thurston County and monitoring public access sites and lake use.
A. **Policy:** Review Consider opportunities for a program and that enables local lake residents to establish a “Lake Watch Program”, based upon the same principals as a Neighborhood Watch Program. Provide support as necessary to empower lake residents to help maintain a safe lake and respectful use of these resources for the benefit of all Lacey citizens.

B. **Policy:** Coordinate responsibility with Thurston County for monitoring activity on lakes within Lacey’s UGA. As much as possible, within existing resources, provide support for calls reporting dangerous or abusive behavior on lakes in Lacey and Lacey’s growth area.

C. **Policy:** Coordinate with the Lacey Police Department in the planning and design of public access facilities to lakes and incorporate Crime Prevention through Environmental Design (CPTED) considerations.

### 17.46.020 - Access (Public) - Development Standards

1. Public access shall consist of a dedication of land, recorded easement or a physical improvement in the form of a walkway, trail, bikeway, corridor, viewpoint, park, deck, observation tower, pier, boat launching ramp, dock or pier area, or other area facility serving as a means of view and/or physical approach to public waters. These facilities and may include interpretive centers and displays.

2. **Opportunities to provide public access shall be evaluated for with all applications for shoreline permits.** Public access will generally not be required for the uses listed below, except as determined on a case-by-case basis where the public access plan (Appendix 1) supports it. The circumstances surrounding the site as a site the public needs or should promote for such use. The incentive Dedication Agreement Program detailed in 17.46.025 may be utilized with any development, except when in conflict with the provisions in subsection 3 below. Offer incentives to a developer or land owner to acquire public access for any activity, including:

   A. Agriculture  
   B. Dredging  
   C. Ecological restoration or enhancement activities not associated with development, except when undertaken by a public entity or publicly financed/subsidized  
   D. Instream structures, except when undertaken by a public entity or publicly financed/subsidized  
   E. Landfill and excavation  
   F. Private docks serving four (4) or fewer dwelling units  
   G. Shoreline stabilization, except when undertaken by a public entity or publicly financed/subsidized  
   H. Single-family residential development of four (4) or fewer lots

Comment [CB10]: Changes to standards (2) C, D and G incorporate required changes outlined in Appendix B.
3. **In addition to the list of uses in Section 17.46.020 #2 above,** the Administrator may waive public access requirements **for any water enjoyment, water related, non-water dependent use or subdivision of more than 4 lots** when one or more of the following provisions apply:

   A. Unavoidable health or safety hazards to the public that cannot be prevented by any practical means;

   B. The cost of providing the access, easement, alternative amenity, or mitigating the impacts of development of the public access is unreasonably disproportionate to the total long term cost of the proposed development;

   C. Significant **environmental** impacts to **shoreline ecological functions** will result from the public access that cannot be mitigated; or

   D. Provision of public access would not be consistent with **the provisions of Appendix 1**, the City Public Access Plan; or the site would not be a benefit to the public based upon the Plan’s criteria for need, identified value, priority or site requirements.

4. **Before public access is waived per Section 17.46.020 #3 above,** the City Administrator must determine that all reasonable alternatives have been exhausted, including:

   A. Regulating access by such means as maintaining a gate and/or limiting hours of use;

   B. Designing separation of uses and activities (e.g. fences, terracing, use of one-way glazing, hedges, landscaping, etc.);

   C. Providing for access at a site geographically separated from the proposal such as a street end, vista, tideland or trail system.

5. **When provisions for public access are waived, this decision shall be made in writing listing the rationale per Section 17.46.020 #3 above,** and shall be archived so that this decision can be reviewed by the Washington Department of Ecology during the next master program update cycle.

6. Parcels **developing** within shoreline jurisdiction, which do not front onto a lake, marine, stream, or wetland shoreline **may not** be required to provide shoreline public access. They may be required to provide public access to other parcels along the shoreline (e.g. water’s edge), where this is needed to **support connections to shoreline public access on shoreline property**. The nexus, proportionality, need and support for such a connection shall be based on goals, policies, objectives and provisions identified in Appendix 1, the City’s Comprehensive Land Use Plan, Transportation Plan, and/or Comprehensive Plan for Outdoor Recreation.

7. If **physical** public access on shoreline parcels is demonstrated to be infeasible or inappropriate **on site** due to significant interference to operations or hazards to life and property, alternative visual access opportunities may be provided at a location not directly adjacent to the water such as a viewpoint, observation tower, or other areas serving as a means to view public waters.

8. The City shall evaluate public access opportunities against needs on a case by case basis utilizing the criteria and methodology outlined in Appendix 1. This master program shall seek opportunities to increase public access to existing publicly owned shorelines, such as street ends, and unopened rights of ways. Public access to the shoreline shall be
balanced with the preservation of shoreline habitat and ecological functions on a case by case basis. The City shall review the identified functions and values of a site, the impacts to those functions and values, the potential for mitigation and the benefit to the public of the proposed access. The Administrator shall give consideration to the public access plan and the priority that should be assigned to the site and the opportunity it presents. Priority is based upon the value to the public considering:

A. The functions and value of the specific reach and rarity of the opportunity the access would provide;

B. Location, ease of access and proximity to other public improvements;

C. The type of access the site can provide based on location, size and site limitations;

D. Public need as identified in Lacey’s Comprehensive Plan for Outdoor Recreation; and

E. Other relevant factors as determined by the Administrator upon consultation with the Director of Parks and Recreation.

Based upon this review, the Administrator shall determine if a site should be considered for public access and the City will consider if mitigation or offsite restoration can be applied for protection of the shoreline area and no net loss of function or value.

89. Public access shall be provided in the following order of preference, where appropriate, and incorporate the following location and design criteria:

A. A public pedestrian path or trail shall be provided along the shoreline and public access can be provided in a manner that will not adversely impact shoreline ecological functions and/or processes—a public pedestrian access walkway parallel to the ordinary high water mark of the property is preferred. Such path or trail shall generally include the following features:

1) The walkway shall be buffered from sensitive ecological features and provide limited and controlled access to sensitive features and the water’s edge, where appropriate.

2) Fencing may be provided to control damage to plants and other sensitive ecological features, where appropriate.

3) Trails shall be constructed of permeable materials unless shown to be infeasible, and limited in width to reduce impacts to ecologically sensitive resources, except for a shared use trail or public access which is part of a boardwalk.

B. Other forms of physical public access. Public access shall be located adjacent to other public areas, accesses and connecting trails, and connected to the nearest public street. If such physical access is a shared use path as defined in this SMP, the design shall comply with required according to the classification of the trail as stated in the Public Access Plan and shall include provisions for handicapped and physically impaired persons, where feasible.

C. Where views of the water or shoreline are available and physical access to the water’s edge is not present, or appropriate, a public viewing area shall be provided.

Comment [CB14]: This change is recommended because the standard reads like a policy as originally drafted, and is repetitive of other information in the document. This reference to Appendix 1 directs the user to the pertinent information without unnecessarily repeating information over and over in the SMP, thereby reducing its volume.
D. Design of public access facilities shall minimize intrusions on the privacy of adjacent landowners, utilizing techniques and approaches outlined in incorporating design review concepts such as avoiding locations adjacent to windows and/or outdoor private open spaces or by screening or other separation techniques. Design techniques of Lacey's Design Review Ordinance (LMC 14.23) supplement standards of this chapter.

E. Public access facilities shall be designed to provide for the safety of users and neighboring landowners, including discouraging the control of offensive conduct through public visibility of the public access area, or through provisions for oversight. The Administrator may authorize a public access facility to be temporarily closed in order to develop a program to address offensive conduct. If offensive conduct cannot be reasonably controlled, alternative facilities may be approved through a permit revision.

F. Public amenities appropriate to the use of the public access area such as benches, picnic tables, restrooms and sufficient public parking shall be provided to serve the users in accordance with the standards in this SMP.

910. Unless in conflict with the particular classification of access has standards specifically called out in the Public Access Plan or the City Comprehensive Plan for Outdoor Recreation, the minimum width of public access easements or dedications shall be ten (10) feet in width, with twenty (20) feet being the preferred width where significant public use is expected. The Administrator may reduce the width of public access easements if undue hardship would result or increase the width if necessary to serve the intended function. However, the reduction or enlargement shall only be what is necessary to achieve the intended purpose.

1011. Public access sites shall be fully developed and available for public use at the time of occupancy of the use or activity or in accordance with other provisions for guaranteeing installation through a monetary performance assurance.

1122. Public access facilities shall be maintained over the life of the use or development. The party responsible for maintenance shall be identified in the authorization or permit decision documents. Future actions by successors in interest or other parties shall not diminish the usefulness or value of required public access areas and associated improvements.

1233. Public access provisions shall run with the land and be recorded via a legal instrument such as an easement or dedication. Such legal instruments shall be recorded with the Thurston County Auditor's Office at the time the land division is recorded and/or prior to the time of building shoreline permit approval or building occupancy whichever comes first.

1344. Management of public access areas including protection and preservation of sensitive areas, provision of appropriate infrastructure and facilities, security, and long term maintenance shall normally be the responsibility of the City of Lacey. However, at its option, the City Administrator may approve another public or non-profit agency to assume this responsibility if appropriate given the use. This responsibility may also be required of the owner, future home owners association, or other entity approved by the City Administrator. If the City Administrator approves another entity to assume this responsibility, it shall be through a formal agreement recorded with the Thurston County Auditor's Office.

1455. Public access facilities shall be available to the public twenty four (24) hours per day unless other hours apply according to standards of the Comprehensive Plan for Outdoor Recreation or Parks.
Department Administrative criteria. For clarity to project applicants, hours of operation should be specified in the shoreline permit.

156. Appropriate signage shall be posted to inform facility users of necessary information including rules and responsible use of the resource. The City’s phone number and contact information shall be included. The City’s approved access sign(s) shall be installed in conspicuous locations at public access sites by the owner/developer. Once the signing of the property has been accepted by the City, it shall be maintained by the City or entity approved by the City that has the long term responsibility for maintenance and management of the access.

162. Development of new uses and expansion of existing uses shall consider existing view corridors from both designated public access view areas and existing private development. These areas are considered a form of access to shorelines. The ability to view the water is considered a form of access to shorelines. Design review will have an emphasis on techniques that minimize impacts to existing views shall be minimized utilizing and help maintain views existing neighbors enjoy. Example toolbox techniques in Lacey’s Design Review Ordinance (LMC 14.23) include and are not limited to the following examples:

A. Utilize design requirements of Section 16.12.050 D, as illustrated in Table 16T.72, to step back the second story to reduce the impact of the expansion to properties both to the side and behind the home;

B. Staggering of homes and flexibility on setbacks to have minimum impact to view corridors, provided the underlying function of setbacks is satisfied related to privacy, light, air and circulation;

C. Placement of landscaping and pruning of over story vegetation to maintain existing view corridors;

D. Placement of structures to minimize impact to existing view corridors; and

E. Other techniques that consider accommodating existing views enjoyed by neighbors.

178. Over-water or in-water public access facilities, fishing piers and docks shall follow the mitigation sequence, environmental impacts to the ecology of the water body. Standards suggested by the Department of Fish and Wildlife or other resource agencies shall be incorporated in site design. Generally recommendations for “Building Better Docks” in the “Green Shorelines” publication shown in Appendix 2 shall be utilized unless the Administrator agrees it is demonstrated that a different design will have less environmental impact given specific site conditions.

19. Where views of water exist along public right of way, new subdivisions shall not locate separate lots or site obscuring improvements like fences in such a way that could eliminate all viewing opportunities. Land division shall be designed to provide open space between existing view corridors and the water to maintain the public’s visual connection with the shoreline.

17.46.025 Access (Public) – Incentive Dedication Agreement

As part of the package of strategies in this SMP to manage shorelines in the public’s interest over the long term, Lacey has developed an incentive density bonus opportunity program for the development

Comment [CB15]: Deletion of these standards is suggested because all of the pertinent standards exist in other City codes that are being referenced in this SMP. References support a more concise, brief and readable document versus a document that restates existing information and standards often with different language.

Comment [CB16]: Deletion of this standard is recommended because it repeats #17 (old; new #16).

Comment [CB17]: As originally drafted, it is not clear if these statements are intended to be policies or are ‘discussion’ as occurs elsewhere in the document. Because there was no clear goal statement, the recommended changes to this section reflect changes necessary to format the text the same as the ‘discussion’ text in other sections of the SMP.
community and shoreline land owners. The concept is designed to further public objectives for public access and management of shoreline resources. The program utilizes an alternative Shoreline Access Incentive Dedication Agreement designed to achieve dedication objectives of shoreline areas for public use and protection as provided in the City's Public Access Plan (Appendix 1).

2. The basis of the concept is to achieve incentivize dedication of shoreline areas to the public in return-exchange for density bonuses and transfers to upland areas under the same ownership or other areas throughout the city. In the context of this program, upland means on lands not within shoreline jurisdiction. Receiving areas for the density bonus or transfers would be designated based upon a determination such sites are able to support increased density in accordance with established City or Regional TDR policies. In addition, development planned for receiving areas needs to be consistent with GMA-the objectives of the Comprehensive Land Use Plan.

3. To promote innovative developments with superior quality and functionality, the strategy combines economic incentives for the development community through significant density credit, goals of the Comprehensive Land Use Plan for quality urban neighborhoods and flexible application of normal zoning code standards at receiving sites to be able to focus on form and design permitting flexibility and encouraging innovation.

4. Project planning and developing development under a shoreline access incentive dedication agreement incentive program dedication agreement needs will be reviewed to ensure that the objectives of the dedication program and the intent to provide superior quality and functional developments are satisfied. Under this alternative incentive program, the Administrator may waive or modify zoning restrictions at the receiving site for such things as setbacks, lot size, height limits, and dimensional requirements and other standards in the zoning district used as density receiving areas, provided all of the following provisions can be satisfied:

A. The design of the development results in a concept of superior quality and functionality as discussed in the Comprehensive Land Use Plan;

B. Development that occurs under the incentive program is designed in a way that results in a land use configuration that is superior to or compatible and complementary to adjacent surrounding land use and the overall character of the neighborhood in which it is located; and

C. All standards of the master program and its intent are satisfied for any development taking place within the shoreline designation jurisdiction.
17.49.000 Boating Facilities - Goals

1. Goal: Provide opportunity to meet demonstrated public need and demand for boating facilities for shoreline areas consistent with the City Comprehensive Plan for Outdoor Recreation, City Public Access Plan, shoreline designations and the overall emphasis on protection of shoreline natural functions and values.


17.49.010 Marinas and Boat Launching Ramps Facilities – Discussion and Policies

Discussion: An existing small private marina for Beachcrest exists just east of the Butterball Cove area along the shoreline of Dewolfe Blight. It is the only marina on shorelines under Lacey jurisdiction. It was developed as part of the Beachcrest development in the late 1940s. Approximately half of the marina is within the City of Lacey and the rest is within Lacey’s UGA and unincorporated Thurston County.

Development of the Beachcrest marina in the late 1940s was typical of development at the time and did not place a high priority on consideration of environmental impacts. This included modification of the estuary area that is salmon habitat.

The existing private Beachcrest marina has been established for over half a century and serves a demonstrated need for the Beachcrest community. It should be considered a viable use and is expected to continue over the long term. At the same time, considering environmental impacts of the Beachcrest community-marina on the shoreline environment, restoration should be acknowledged for this area.

Looking at the need for public marinas, there is little justification for location of a public marina in the Lacey area. The marine shoreline of Lacey is extremely limited and its sensitivity and designation as Natural does not lend it to establishment of another marina use. The lakes under Lacey’s jurisdiction are too small to have a need for or to support a marina.

Because of the lack of acceptable shorelines for this use or demonstrated public need, new marinas should not be expected or planned for under the jurisdiction of Lacey’s Shoreline Master Program or within Lacey’s urban growth area.

Policies for marinas:

1. Policy: There are no shoreline areas within the City of Lacey suitable for this activity and there is no demonstrated public need. Lacey’s lakes are too small to justify a marina and the majority of marine shoreline under Lacey’s jurisdiction is designated Natural and is not suitable for marina...
activity. New marinas should be prohibited within this SMP unless a public need is identified and demonstrated within Lacey’s Comprehensive Plan for Outdoor Recreation.

12. **Policy:** The existing Beachcrest marina is an established permitted use in the Aquatic environment and this use is intended to continue over the long term as a private marina. It is the intent of this SMP to provide the Beachcrest community the ability to make repairs and perform maintenance necessary to retain full use of the marina. At the same time, given the environmental sensitivity and importance of this area, it is also the intent to utilize new best available science with environmentally friendly methods to accomplish maintenance objectives. Expansion and maintenance or repair activities at the Beachcrest marina should follow the mitigation sequence.

Implementation of these regulations shall provide for both maintaining a functional marina and achieving a healthy ecologically productive shoreline over the long term. To achieve these intents, maintenance and repair should be reviewed under the provisions of Section 17.37.047 with the expectation that exemptions will be provided for projects, both maintenance and replacement of modifications, that demonstrate a commitment to no net loss and restoration objectives.

3. **Policy:** The continued designation of Conservancy for that portion of shoreline surrounding the Beachcrest marina where it has been modified for marina activity is appropriate. It does not fit the criteria for Natural. However, the estuary to the south of the marina fits the environment designation criteria of Natural and should be designated as such.

24. **Policy:** The Beachcrest Community Association is encouraged to look for environmental restoration opportunities when performing marina maintenance or repairs. Incentives should be provided to the Beachcrest Community Association for activities that meet restoration objectives. Priority should be for restoration of degraded areas on this reach, as discussed in Lacey’s Restoration Plan (Appendix 3).

35. **Policy:** Having Because the Beachcrest marina falls under the jurisdiction of both Thurston County and the City of Lacey, could make permitting activities may be complex for the Beachcrest HOA. To this end, make permitting easier, the City of Lacey will support an interlocal agreement with Thurston County to have one jurisdiction be the lead local jurisdiction for permitting activities. Because the SMPs may have different definitions, process and standards for the same activity. The SMP from of the lead jurisdiction per the interlocal agreement should be the SMP used to determine permitting process and requirements.

Policies for boat launch facilities:

1. **Policy:** Additional boat launch facilities may be needed in the future. The City's Comprehensive Plan for Outdoor Recreation and Public Access Plan should be used as a guide to determine public need for new boat launch facilities. Evidence of substantial demand should be given for new boat launching facilities before considering approval of new facilities for this use.

2. **Policy:** Locate boat launch ramps on stable shorelines where water depths are adequate to avoid the net loss of shoreline ecological functions or processes, and eliminate or minimize the need for
offshore or foreshore channel construction dredging, maintenance dredging, spoil disposal, filling, beach enhancement and other river, lake, harbor and channel maintenance activities.

3. Policy: Where provided, require fuel handling and storage procedures that minimize accidental spillage and provide satisfactory means for handling those spills that do occur.

4. Policy: Locate launch ramps to minimize the adverse effects upon fish and shellfish and their habitat(s).

5. Policy: Locate boat launching facilities in areas where parking and access to the facility can be accommodated without causing adverse impacts upon the adjacent properties.

6. Policy: Design and construct the site so as to minimize off-site light and glare by using fully shielded and appropriately aimed fixtures to provide appropriate lighting levels.

7. Policy: Design boat launch facilities to provide for as many compatible shoreline dependent water oriented recreational uses as possible, according to the size and extent of the facilities.

8. Policy: All boating facilities shall use effective environmentally friendly measures to prevent the release of oil, chemicals, or other hazardous materials onto or into the water.

9. Policy: All facilities should address provide adequate parking needs and landscaping.

10. Policy: Boat launch facilities shall be designed and conditioned to avoid and mitigate identified impacts to adjacent properties. This shall include, but is not limited to impacts such as wave action, and shoreline erosion of shoreline, and privacy issues and enforcement of responsible behavior.

17.49.015 Covered Moorage - Policies

Policy: Covered moorage in Lacey's lakes or in the natural designated marine shoreline is considered unnecessary and would distract from the shoreline's aesthetic and functional values. This use should be prohibited.

17.49.020 Boating Facilities Development Standards

Marinas

1. Lacey has no area to accommodate a new marina and new marinas shall be prohibited until such time as there is a demonstrated need shown and the activity is planned for according to goals, policies and priorities in Lacey's Comprehensive Plan for Outdoor Recreation. The existing Beachcrest marina shall not be labeled nonconforming as a result of this provisional prohibition on new marinas.

2. The existing Beachcrest marina and its accessory facilities are considered an established use serving a demonstrated need and expectations of the Beachcrest community. The area it is situated in is...
敏感和维护和改善活动需要满足不净失生态功能和价值的要求。

23. 如莱西为实施区域管辖权的主体，负责实施在综合协议下描述的码头活动，管理与修复活动在海滩湾码头应当遵守第17.30.047节的规定。然而，为了促进和鼓励在莱西修复计划（附件3）中讨论的修复目标，对超出正常修复和维护50%阈值的修改和更换修复活动可能获得豁免。要获得豁免，此类活动必须：

A. 促进莱西的修复目标，如在附件3和其他适用部分所讨论的本SMP；
B. 预期最终结果在一个净增加的生态价值和功能对这个河段，由管理员在咨询适用州资源机构后确定；
C. 提供充分的文件和分析，使决策者能够对提议的活动的环境效益作出明智的决定，由管理员确定。

覆盖码头：

新覆盖码头是不被允许的。现有的覆盖码头可以维护并被认为是祖父条款，但不得扩大。

船用登船设施：

1. 登船设施应当位于有充足水体混合和冲洗的区域，并且不应当降低或影响冲洗特性。
2. 登船设施应当位于稳定海岸线，水深充足，无需开发或填海造陆等海岸线维护活动。
3. 所有船用设施应当利用有效的、环保的措施防止油类、化学物质或其他有害物质进入水体。
4. 如果必要，船用设施应当提供洗手间，由管理员确定，并且可以根据场地分类和条件被容纳。
5. 登船设施应当符合莱西的停车和绿化要求以及停车部分（第17.60节）的本SMP。
6. 应当在船用设施上张贴指示，提醒使用者负责任地使用，其中包括受权管理湖泊的规则，一般应当有类似意图的语言：

   1. 速度限制为……；
   2. 请勿乱丢垃圾；
   3. 限制过大的噪音；
   4. 日间营业；
   5. 如需帮助，请拨打莱西警察局电话（插入当前莱西警察局电话号码）。

Exhibit C-6: Continuation of Recommended Change “III” 4
Covered Moorage:

New covered moorage is not permitted. Existing covered moorage may be maintained and is considered grandfathered but may not be expanded.

17.49.021 Standards for Marinas

1. Lacey has no area to accommodate a new marina and new marinas shall be prohibited until such time as there is a demonstrated need shown and the activity is planned for according to goals, policies and priorities of Lacey’s Comprehensive Plan for Outdoor Recreation.

2. The existing Beachcrest marina and its ancillary facilities are considered an established use serving a demonstrated need and expectations of the Beachcrest community. The area it is situated in is sensitive and maintenance and improvement activities need to meet requirements of no net loss of ecological function and value.

3. If Lacey is the lead for permitting marina activity, maintenance and repair activities at the marina shall comply with the provisions of Section 17.30.047. Provided, to facilitate and encourage objectives discussed in Lacey’s Restoration Plan (Appendix 3), repair and maintenance activities exceeding the 50% threshold for normal repair and maintenance and considered replacement may qualify for exemption. To qualify for exemption, such activity must:

   A. Promote Lacey’s restoration objectives as discussed in Appendix 3;

   B. Be expected to result in a net gain of ecological value and function for this reach, as determined by the Administrator in consultation with applicable state resource agencies; and

   C. Provide adequate documentation and analysis to make an informed decision on the environmental benefits of the proposed activity, as determined by the Administrator.
17.63.000 Residential Development - Goals and Policies

1. Goal: Achieve development of residential areas in a way that does not interfere with natural shoreline processes. Ensure new residential development, infill and redevelopment within shorelines jurisdiction is sensitive to and complements the shoreline ecological function.

A. Policy: Use the inventory and characterization report to designate property for the shoreline residential designation. Ensure shoreline area designated for this use has the capacity to sustain planned development.

B. Policy: Plan, design and construct residential development should be planned, designed and constructed to avoid then minimize adverse environmental and visual impacts, to be complementary to the shoreline environment and its natural processes and to promote no net loss of ecological functions.

C. Policy: Residential development will be located to ensure it does not interfere with natural shoreline processes.

D. Policy: Residential development will should be located so that no future shoreline stabilization or armoring is not necessary will be required to protect development.

E. Policy: Residential development will should be designed to minimize impacts to views from surrounding homes and viewpoints.

F. Policy: To achieve no net loss of ecological functions along Woodland Creek and other stream corridors, generally prohibit. The removal of riparian non-invasive riparian vegetation for residential development should be discouraged and should follow the mitigation sequence. In cases where removal of any riparian vegetation is unavoidable, require full mitigation of impacts by re-vegetation of disturbed areas with native riparian vegetation.

G. Policy: Open space required through the subdivision code in new residential subdivisions will satisfy goals and policies identified in the Urban Forest Management Plan to protect Lacey's urban forest canopy and should also promote shoreline goals for habitat-resource protection and restoration if the subdivision is within shoreline jurisdiction.

H. Policy: Removal of native riparian understory vegetation necessary to allow an approved pedestrian access corridor may be permitted. Shoreline access segments on residential lots should be designed and located in accordance with the mitigation sequence to avoid and minimize impacts to native vegetation and shoreline ecological functions.

I. Policy: Along lakefront shoreline within the OHHM setback and buffer area, require retention of degraded areas is encouraged. In cases where removal of any riparian vegetation is unavoidable, replanting of native riparian vegetation or an approved equivalent is required to achieve no net loss of ecological functions.
**JG. Policy:** Where non-native or invasive species are present along lakefront residential waterfront property, restoration of degraded areas is encouraged.

**H. Policy:** As part of replanting requirements and restoration, areas may be planted with an alternative to native species. If alternatives to native species are used in accordance with Section 17.41, the alternative landscaping must provide the same functions as native vegetation for habitat value, erosion control, drainage retention and water quality and must not require fortification.

**JK. Policy:** Lacey will provide information to promote education of citizens about the need for and benefits of shorelines protection, and restoration and the role of vegetation management in water quality and a healthy shoreline.

**L. Policy:** Build restoration for healthy shorelines into the expectations for new development and redevelopment.

2. **Goal:** Provide the opportunity for residential development in appropriate shoreline areas and in a variety of forms that are best suited to accomplish objectives of this SMP. Land use form should promote no net loss of function or value with design complementary to and integrated with the natural processes and functions of the shoreline.

**A. Policy:** Form, density, design, layout and functionality of a residential development should be compatible and sensitive to the shoreline designation, natural processes and to environmental limitations.

**B. Policy:** Encourage the clustering of residential development to minimize the potential for adverse impacts to loss of shoreline ecological functions and to encourage larger, consolidated blocks increase of open spaces.

**C. Policy:** Encourage clustering whenever it will result in less impact to the shoreline. This can be achieved by placing clustering within or outside shoreline jurisdiction or as part of an incentive program for transfer of density outside the shoreline jurisdiction to the same or different ownership.

**D. Policy:** Proposals to cluster development should provide superior protection, preservation, and public use opportunity for shorelines. Clustering techniques should be used for placement of homes to take advantage of site conditions to minimize environmental impact and to utilize innovative designs that provide more open space, undisturbed buffer area, opportunity for public access or other environmental and community benefits.

**E. Policy:** Utilize provisions in the City’s subdivision code to prevent the segmentation of critical areas among many owners by requiring in new subdivisions, by placing critical areas within separate tracts that are deeded to the City.

**F. Policy:** New over water residential development should not be authorized.
3. Goal: Integrate **residential development in the shoreline residential designation jurisdiction** with growth management planning, and provide opportunities for the development community that promote GMA strategies, quality residential neighborhoods, shoreline protection and restoration of shoreline resources.

A. Policy: Residential development **should only be allowed** only when there are adequate provisions for utilities, circulation and access as provided for in the Comprehensive Land Use Plan.

B. Policy: The findings of the shoreline inventory and characterization report should be integrated into GMA planning and buildable lands work to ensure fragile components of shoreline resources are given higher priority than expectations for infill when contemplating development expectations for infill and utilization of remaining undeveloped property in the shoreline residential designation.

4. Goal: Integrate functional and environmentally friendly access into the shoreline residential designation to provide for Lacey’s shoreline access needs through careful planning, design, layout and location of new residential development and residential land divisions.

A. Policy: Residential development **will** provide for the access needs of residents of the development as well as opportunities for public access identified in Lacey’s Public Access Plan. Access opportunities will depend on the nexus identified for each project. This will include consideration of connectivity and access to existing and planned public trails and other public amenities to serve the needs of new residents.

B. Policy: Look for design opportunity to integrate dedicated shoreline access and open space into new residential development to provide for the needs of residents and the general public and in a way that both will mutually benefit.

BC. Policy: Open space in residential subdivisions will be designed to accommodate the intended use(s), and intended uses should be appropriate to the capacity of the shoreline resource to support it. Where appropriate, reserve shoreline open space tracts in a relatively undeveloped state, balancing competing interests for open space consistent with Lacey’s Urban Forest Management Plan, Public Access Plan, land division open space policies and the goals of this Shoreline Master Program.

D. Policy: Preserve shoreline open space tracts in a relatively undeveloped state, balancing competing interests for open space consistent with Lacey’s Urban Forest Management Plan, Public Access Plan, land division open space policies and the goals of this Shoreline Master Program.

E. Policy: Use a full range of tools discussed in the Public Access Plan to provide public access opportunities that will enhance value and opportunities for future residents of the subdivision as the general public.

CF. Policy: Provide public access as a part of the a residential development in locations where there has been significant historical usage by the public. Historic use is regular use by the public over a period of years rather than incidental or occasional use by one or only a few members of the public. This policy is not intended to apply to construction of an individual dwelling on a single lot.

Comment [CB4]: This priority statement was added at the request of the City.

Comment [CB5]: This deletion is suggested because the same information is addressed in policy A.

Comment [CB6]: As originally written, this policy could conflict with policy C (old; new policy B) above. Deletion of this policy and moving the information to the previous policy helps clarify the intent.

Comment [CB7]: This deletion is recommended because other portions of this section and this SMP cover this policy well.
G. Policy: Utilize clustering options, incentives and flexibility towards innovative and responsible
design to meet public access objectives.

17.63.025 Residential - Development Standards

1. Permitted Uses and Activities: Only those residential uses/activities and development as
   identified in Table 3 shall be permitted according to the specific shoreline environment designation as
   outlined in Section 17.24.010, Table 3. Residential activity, use, or development shall not result in a
   net loss of shoreline ecological functions and values and shall follow the mitigation sequence.

2. Prohibited Uses: Prohibited residential uses are identified in Table 3. New over water

Comment [CBB]: Deletion of this policy is suggested because the information is more appropriately and completely covered above in policies related to clustering (Goal 2 and supporting policies).

17.63.022 Permitted Uses/Activities/Development

1. Consistent with Shoreline Designation:

Only those residential uses/activities and development as identified in Table 3 shall be permitted according to
the specific shoreline designation.

2. Consistent with Functions and Values:

In addition, the activity, use, or development must be compatible with the physical characteristics and
identified functions and values of the subject reach in which it is proposed and shall be designed and
located accordingly.

17.63.024 Prohibited Uses

1. Table 3:

Uses other than those identified in Table 3 of the Shoreline Master Program are prohibited.

2. Over-Water Prohibited:

Residential development over water is prohibited.
3. **Density: Residential densities**

### 17.63.026-Density

#### 1. Density for Shoreline Designations:

The overall density permitted for on lands within shoreline jurisdiction shall be no greater than that density identified for the specific designation in Section 17.24.015, Table 4, in addition to potential density bonuses as provided in Chapter 16.58. Density permitted is as follows:

#### 4. Housing Form:

Residential housing forms permitted within each shoreline environment designation are outlined on Table 3. A range of housing form options will be permitted to encourage projects that are compatible with shoreline resources, meet GMA goals for density and provide a quality residential environment.

#### 5. Clustering:

Compact housing forms that consolidate large areas of open space by reducing individual lot size and clustering units and/or lots shall be encouraged. This provides the opportunity for a design that can achieve a higher level of compatibility with the shoreline environment. This may include condominium, townhome, courtyard, cottage or other design forms that accomplish the same objectives. This will include attached and compact housing forms to achieve urban density and environmental compatibility. Shoreline Residential—4 units per gross acre;

Urban Conservancy—1 unit per gross acre;

Natural—1 unit per 10 gross acres;

Aquatic—Not applicable, residential development is not permitted;

Provided that density within the Shoreline Residential, Urban Conservancy and Natural designations may be granted a density bonus increase to exceed the underlying density cap pursuant to adoption of an incentive dedication development agreement as provided in Chapter 16.58. This agreement grants density credit for the property if the density is transferred to ownership outside shoreline jurisdiction and the shoreline property (property under jurisdiction of this SMP) is dedicated to the public.

### 17.63.028—Housing Form within Shoreline Jurisdiction

#### 1. Residential Form Generally:

A. Within the 200-foot shoreline jurisdiction, the form of urban residential development shall be designed to be compatible with the shoreline environment.

---

*Comment [CB9]: Changes suggested to the above section are primarily to combine like statements and information into more concise statements, and to reduce the length of the section. More accurate description of the shoreline access incentive dedication agreement program is given in later parts of this section.*
B. Concepts that use unique or innovative designs to achieve the goals of this Shoreline Master Program are encouraged and will be allowed flexibility in meeting design standards.

C. A range of housing options will be permitted for projects that are compatible with shoreline resources, meet GMA goals for density, and provide a quality residential environment. This will include attached and compact housing forms to achieve urban density and environmental compatibility.

6. Design with Nature:

Design of residential structures shall incorporate and follow to the extent possible existing, natural physical topographic profiles to work with the site’s natural components, without impact to functions and values identified in the inventory, analysis, and classification of the subject reach. Residential development shall be sufficiently setback from the OHWM or otherwise located so that future shoreline stabilization or armoring is not necessary to protect it.

2. Design with Least Impact:

For projects that include more than one residential unit, or a land division of property, design with least impact to the environment may require a clustering concept to minimize site disturbance and impervious area. This will include common facilities that provide use of shoreline resources for residents and also minimize impact and physical alteration of shoreline area.

3. Clustering and Housing Form:

A. Compact housing forms that consolidate large areas of open space by reducing individual lot size and clustering units is encouraged. This provides the opportunity for a design that can achieve a higher level of compatibility with the shoreline environment.

B. Clustering of residential units will require an attached development concept or a compact detached concept. Housing forms that utilize compact low impact design to achieve the goals of this Master Program for integration, compatibility with natural shoreline processes, and environmental sensitivity are preferred. This can include condominium, townhome, courtyard, cottage designs and other innovative housing forms that accomplish the same objectives.

17.63.029

7. Lot Area Bulk and Dimensional Standards:

1. Ordinary High Water Mark Setback and Buffer:

All development within the 200-foot shoreline jurisdiction shall meet the setback and vegetation management area buffer requirements as outlined from the ordinary high water mark (OHWM) in Section 17.24.015, Table 4, Section 17.41, and all other applicable sections of this SMP. Any modifications to the dimension, content or vegetation within such areas shall also comply with all policies and standards in this SMP. This will be dependent upon the particular shoreline designation as described in Table 4 (Development Standards), the most intensive use expected on the property, the buffer is designed to protect against and vegetative buffer standards in Section 17.41.
28. Setbacks for Porches/Decks/Steps:

Uncovered porches, decks or steps attached to principle residential structures may project into the required setback from between the OHWM and the structure provided all of the following requirements are met:

A. Uncovered porches and decks are limited to an 8 foot deep encroachment and the structure may be no higher than thirty (30) inches above the average grade;

B. Material used for porches shall be pervious and approved as a low impact development material by the City;

C. Uncovered porches and decks that encroach on the OHWM setback shall follow the mitigation sequence and provide compensatory mitigation for any unavoidable impacts to the vegetation management area buffer by providing vegetation additional vegetative restoration and/or mitigation proportionate to the surface area covered by the encroachment and buffer area reduced elsewhere in the vegetation management area; and

D. Steps located within the shoreline access segment; and

D. The structure does not compromise any other goals, policies or standards of this Shoreline Master Program.

Front Yard and Side Yard Setbacks:

Front yard setbacks are designed to provide light, air and circulation for a development and also have practical applications considering private open space, drainage treatment and intended use. Depending upon the urban form and open space opportunities provided by the development setback needs will vary to achieve the intended function.

Front Yard and Side Yard Setback: For projects that have standard urban form, the following is the basic requirement for front and side yard setbacks:

Front yard setback: 20 feet from the fronting right of way, provided this may be reduced to within 10 feet if the garage is recessed behind the front façade of the house. This applies to all urban housing forms. This applies to all urban housing forms.
Side yard setback: For detached housing forms, detached structures 5 feet or a minimum maintain a 10 foot separation. Attached or “zero lot line” developments shall observe side yard setbacks in accordance with the applicable design or development chapter of the Lacey Municipal Code.

To accommodate better preservation or protection of shoreline ecological function, a range of needs, an applicant may request a unique front or side yard setback standard. The unique setback shall be that which is based upon a particular development concept and design that is justified based upon a unique targeted urban form and shall demonstrated the ability to functionally protect resources and fulfill other purposes of setbacks and structure separation equivalent to standard setbacks. The burden of demonstration will be on the applicant. Approval of any modification other than the standards described below is at the discretion of the City.

For projects that have standard urban form, the following is the basic requirement for front and side yard setbacks:

Front yard setback—20 feet from the fronting right of way provided it may be within 10 feet if the garage is recessed behind the front façade of the house. This applies to all urban housing forms;

Side yard setback—detached structures 5 feet or maintain a 10 foot separation. Attached or 0 lot line per applicable development chapter.

4. Front Yard and Side Yard Setbacks:

10. Size and Shape of Single Family Detached Lots:

Shall be as follows, provided they adhere to the density requirements:

A. Minimum lot area, seven thousand five hundred (7,500) square feet or as permitted under another development concept such as clustering, as provided in this Section 17.63.029 4 C., below of the SMP or in LMC Section 14.23.072, particularly LMC Section 14.23.072 (L).

B. Minimum lot width, fifty (50) feet.

C. Alternative lot sizes and configurations for single family detached lots is encouraged to provide the most compatible design for the protection of the shoreline’s unique characteristics provided the alternative configuration complies with all of the following:

1) Other applicable standards in this chapter.
2) Design criteria in LMC Section 14.23.072, particularly LMC Section 14.23.072 (L).
3) The design results in a superior land division layout considering its functionality and character with particular consideration given to privacy for individual lots, pedestrian access and convenience, and the design of public and/or private open space opportunities, natural features and protection of shoreline natural functions and values.

511. Size and Shape of Lots Intended for Attached Single Family Development:

These lots intended for attached single family residences shall be reviewed and approved through a subdivision, townhouse, or PRD process where the concept is identified and the project is reviewed and approved subject to design requirements of LMC Section 14.23.080.

126. Maximum Building Area Coverage:
Fifty (50) percent, except as limited by the environment designation; see Table 4.

**513. Maximum Development Coverage:** Residential lot development coverage standards for lots within shoreline jurisdiction are identified in Section 17.24.015, Table 4.

Will depend on environmental classification; see Table 4 in Section 17.24.015. Side and rear yard patios are exempt from development coverage restrictions provided the paving material used is considered pervious pavement by the City of Lacey’s Public Works Department.

**814. Maximum Height:** For principle structures, as described in Table 4. The maximum height for a residential accessory building is sixteen (16) feet.

An additional two (2) feet in height shall be permitted for any residential structure with a green roofs occupying at least fifty percent of the area of the roof, as long as such additional height does not block the view of a substantial number of existing residences.

**915. Accessory buildings:**

A. All accessory buildings shall comply with the setback, and critical area buffer and vegetation management area provisions and other standards as stated in this chapter of this SMP; provided, however, if the accessory building is less than two hundred square feet in total size, the following side and front yard setbacks are permitted provided the setback from the OHWM setback shall not be reduced:

1) Front yard, fifteen (15) feet.
2) Side yard, five (5) feet.

B. Accessory buildings shall be constructed in such a manner as to make them be complementary to the basic architectural character of the main building on the lot, or appropriate to the accessory use. Such uses shall generally meet the same design requirements of the primary structures and shall result in no net loss toof shoreline ecological functions.

**17.63.032–16. Design Review:**

1. **Design Review Required:**

Design review is an integral part of Lacey's planning program. It is a planning tool Lacey uses to promote development of housing and neighborhoods that will provide a functional, attractive and memorable living experience for residents. Design review applies to all residential, commercial and industrial development in the City, including development in shoreline jurisdiction.

2. **Macro Neighborhood Design and Layout:**
A. Neighborhood Considerations Generally:

Design of residential developments, including land divisions, condominiums, binding site plans and other forms of land division, shall meet applicable neighborhood design requirements identified in Chapter 14.23.

B. Neighborhood Intent:

The focus here is on how the development will be:
1) Integrated into the neighborhood with existing uses,
2) The role it is expected to serve in a neighborhood context,
3) Special design necessary to achieve SMP objectives,
4) How the development may impact neighborhood character, and
5) What design is necessary to maximize functionality for everyday living including connectivity to important neighborhood areas, transportation options, and social interaction.

A. C. Unique Shoreline Qualities:

In shoreline areas, emphasis will be placed upon protection and long term management of shoreline resources and public use based on the unique opportunities specific sites may provide.

D. Neighborhood Look and Feel:

1) Development plans shall be consistent with the intent expressed in Section VI E. 1.d of the City Comprehensive Land Use Plan and applicable design requirements of Chapter 14.23.
2) Design must address the overall look and feel of the development and its ability to create or maintain a sense of place for residents.

3. Micro Design: Siting of Individual Uses:

A. Generally:

The siting and placement of all forms of residential development shall meet applicable design standards of Chapter 14.23.

B. Integration and Functionality:

Focus at the individual site level is how the individual structure and use will be integrated into the subdivision and shoreline environment.

4. General Considerations:

General design considerations for all forms of development are detailed in Chapter 14.23. Concepts that have particular applicability to development within shoreline jurisdiction and should be emphasized include:

A. Integration of new development with neighboring units;
B. Providing area with outdoor privacy for each individual ownership;
C. Design that emphasizes use and importance of neighborhood focus points when designing land divisions and the location and orientation of individual units;

D. Taking advantage of unique site features;

E. Creation of common open space that can be used for passive or active recreation opportunities, provide opportunity for community activity and be used as a focus point in a development;

F. Creating attractive qualities and visual interest that will provide comfort and a feeling of place for residents;

G. Shoreline developments should utilize natural amenities and unique features of the site to meet these design objectives.

5B. Emphasis for Shoreline Areas:

1A. Specific shoreline emphasis will be for integration of the development with a site’s specific unique shoreline features and preservation and respect for the site’s natural processes and functions.

2B. Emphasis will include design for a sustainable development that will have minimal impact upon the environment and provide an opportunity for residents to enjoy the shoreline resources.

C. Residential Development within shoreline jurisdiction shall comply with all applicable standards of LMC 14.23, Design Review.

76. Views:

A. Development in shoreline jurisdiction shall maximize views for new residents while and, as much as possible, maintaining views enjoyed by surrounding residents and the traveling public.

B. To the extent reasonable objectives of the builder can be achieved, residential development shall be arranged and designed to:
   1) Protect views, vistas and aesthetic values of the shoreline;
   2) Minimize impacts to the character of the shoreline environment;
   3) Minimize impacts to the views neighboring property owners enjoy.

218. Public Access: Public access shall be considered, evaluated, required, located, planned, designed, constructed and maintained in accordance with the provisions in Section 17.46 and Appendix 1 of this SMP.

A. Public access to shorelines is an emphasis in both state and local legislation and planning. New residential developments shall provide public access according to priorities discussed in the City Public Access Plan; see Appendix 1.
B. Need for access will consider connectivity new residents will require to existing and planned public trails, pedestrian ways and other public amenities.

C. Design of shoreline projects shall incorporate concepts to achieve priorities identified in Lacey's Public Access Plan and applicable goals identified in the Comprehensive Plan for Outdoor Recreation.

D. Concepts that tie new development into existing public outdoor recreation opportunities and expand the amenity for both the benefit of new residents and the general public are a top priority.

E. Design of new developments should improve opportunities for both new residents and the general public and link neighborhood areas and the greater community.

F. An example of a preferred concept is a new development that creates a new pedestrian access to the water that ties into an existing public trail. This will give new residents access to a trail that may provide access throughout a neighborhood area, around a lake, or along a stream corridor. It will also benefit the general public, by addition of another leg or piece of the larger trail system that extends the amenity into an area not previously available.

17.63.034 Shoreline Access Incentive Dedication Agreement - Density Credit

1. Density Bonus Generally:

A. With a Shoreline Access Incentive Dedication density credit project implemented under the development agreement process of RCW 36.70B, and provisions of LMC 16.58, and Section 17.46 of this SMP, density credit available for transfer to receiving sites outside of shoreline jurisdiction can be granted for up to 20 units per gross acre in the Shoreline Residential, Urban Conservancy and Natural designations.

B. To qualify for the density credit, the shoreline project shall include dedication of the 200 foot shoreline jurisdiction area to the public and transfer of the development and density credit to lands outside of the 200 foot shoreline designation and to a receiving area approved by the City. Receiving sites may include lands within the same ownership, a contiguous ownership, or any other site reviewed and approved by the Administrator.

2. Receiving Sites:

Transfer of density will be to a designated "receiving" site(s) outside the 200 foot shoreline jurisdiction. Receiving site(s) and may include the following:

A. The same ownership;

B. A contiguous ownership;

C. Any approved contiguous or non contiguous receiving site throughout the City.

3. Receiving Sites Location and Criteria for Development:
Receiving site(s) will be allowed across the full range of residential and commercial zones and in every planning area. Receiving sites must meet criteria established in Chapter LMC 16.58 and will include components for:

3. Consistency with GMA planning strategies;

Consistency with Lacey’s GMA Comprehensive Land Use Plan goals and policies for quality neighborhood development;

Design review emphasis for creation of compact urban development providing the high quality of life and living experience that Lacey’s GMA plan seeks to achieve;

If neighborhood specific plans have been developed, guidance will be used from these plans for designation of potential receiving sites to allow the intensive infill and re-development opportunities this program is expected to support.

Wetlands Excluded from Calculations:

Wetlands and lands below the ordinary high water mark shall not be included in calculations of used to compute required lot area or lot dimensions, allowed densities and/or required yards.

5. Housing Form of Transferred Density:

A. The form of transferred density outside the shoreline jurisdiction may be any combination of urban residential form approved in the development agreement.

B. The process for and requirements of an incentive dedication development agreement (where bonus density is transferred from a shoreline property to another area of the City and the shoreline property is dedicated to the City) is described in Chapter 16.58 of the Lacey Municipal Code.

17.63.038 Basic Environmental Performance Standards

1. Nuisance Characteristics:

Authorized residential Permitted uses shall create no noise, emissions, odors or other nuisances which are demonstrably disruptive or disturbing to other uses in the area, or which are of a quality or quantity not normally associated with the such a permitted residential use.

Comment [CB15]: Deletion of the bulk of this section is suggested because it is covered in LMC 16.58.
2. **Dedication of Sensitive-Critical Areas:**

Design of land divisions and location of land uses shall protect streams, wetlands, wetland buffers, floodways, channel migration zones, and geologic hazards by locating these features within a separate tract or parcels when land division is proposed. Such areas shall be dedicated to the City of Lacey or held in common by the subdivision landowners as determined by the City pursuant to LMC Section 14.28.030.

**17.63.039 Off-Street Parking**

Off-street parking standards shall be provided in accordance with Section 17.60 of the Shoreline Master Program. Additional guidance is provided in Chapter 16.72 of the Lacey Municipal Code.

**17.63.040 Landscaping**

Landscaping Required Generally:

Preservation, maintenance and revegetation or landscaping of residential lots or subdivisions shall be required and is required in every zoning designation in Lacey’s zoning ordinance and it is also required in each shoreline designation. The purpose is to minimize surface water runoff and diversion, prevent soil erosion, and promote the aesthetic character of the community, in accordance with all applicable standards of Section 17.41 of this SMP and LMC 14.32, LMC 16.12, and LMC 16.80 shall be required for shoreline projects requiring a permit or exemption.

**17.63.045 Stormwater Runoff**

1. **General Requirement:**

All requirements of the Lacey Drainage Manual shall be satisfied.

2. **Special Drainage Considerations in a Shoreline Designation:**

A. An emphasis shall be placed on low impact development techniques.

B. Infrastructure associated with handling community stormwater systems shall be located within 200 feet of the designated setback area and its associated buffer management area. This does not apply to rain gardens for a single family residence on an individual lot.

C. For all uses within shoreline jurisdiction, native naturalized landscaping or its equivalent is required. Naturalized concepts shall incorporate rain garden concepts where possible to properly preserve, maintain, and revegetate areas of the community.
treat runoff before it gets to the water body. Protection of water quality in this sensitive environment is a priority.

CD. All applicable requirements of Section 17.70 of this SMP shall be satisfied.
I. Introduction

A. Background

Generally - This shoreline access plan has been created to provide an analysis of public access needs and opportunities to Lacey's Shoreline areas and to plan for the acquisition and long term management of shoreline access for public use. It meets the requirements of the Shorelines Management Act for Lacey's shoreline public access planning process and is intended to guide Lacey's efforts in achieving public shoreline access goals.

This Plan provides an inventory of existing public access to shorelines, discussion of opportunities for additional access and criteria for evaluation of access opportunities. In addition, this Plan discusses specific strategies and programs to acquire shoreline areas and access for public use and provides policy guidance for achieving shoreline access goals.

This shoreline access plan has been created as an appendix of Lacey's Shoreline Master Program and is intended to be used in concert with the Shoreline Master Program, the Comprehensive Land Use Plan and the Comprehensive Plan for Outdoor Recreation for goal and policy guidance on issues involving public shoreline access and open space.

Requirements of state law for public shoreline access planning - There are three basic policy goals to the Shoreline Management Act: shoreline use, environmental protection and public access. The SMA emphasizes accommodation of reasonable and appropriate uses, protection of shoreline environmental resources, and protection of the public's right to access and use the shorelines (see RCW 90.58.020).

Master programs must include a public access element making provisions for public access to publicly owned areas, and a recreational element for the preservation and expansion of recreational opportunities.

The overarching policy is that “the public’s opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state shall be preserved to the greatest extent feasible consistent with the overall best interest of the state and the people generally. Alterations of the natural conditions of the shorelines of the state, in those limited instances when authorized, shall be given priority for...development that will provide an opportunity for substantial numbers of people to enjoy the shorelines of the state.”

The SMA also implements the common law Public Trust Doctrine. The essence of this court doctrine is that the waters of the state are a public resource for the purposes of navigation, conducting commerce, fishing, recreation and similar uses and that this trust is not invalidated by private ownership of the underlying land. The doctrine limits public and private use of tidelands and other shorelands to protect the public's right to use the waters of the state.

Public access is defined as the ability of the general public to reach, touch, and enjoy the water’s edge, to travel on the waters of the state, and to view the water and the shoreline from adjacent locations (WAC 173 26 221(4)(a)).
B. Timeline

A timeline for the complete Shoreline Master Program update (a multi-year program) is below:

**TABLE 1: TIMELINE FOR THE SHORELINE MASTER PROGRAM UPDATE FOR THE CITY OF LACEY.**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Update Schedule</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>• Determine what shorelines are regulated under the act</td>
<td>Winter 2008</td>
</tr>
<tr>
<td></td>
<td>• Conduct an inventory of all existing and available data for shorelines</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Public Open Houses</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>• Analyze and characterize shoreline conditions</td>
<td>Spring 2008</td>
</tr>
<tr>
<td>3</td>
<td>• Categorize each shoreline segment into a designation such as urban, suburban,</td>
<td>Fall 2008</td>
</tr>
<tr>
<td></td>
<td>or rural. Each will have a different set of rules.</td>
<td>Winter-Spring 2009</td>
</tr>
<tr>
<td></td>
<td>• Develop draft rules and policies</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Public meetings</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>• Analyze the cumulative impacts of expected shoreline development or redevelopment</td>
<td>Winter-Spring 2009</td>
</tr>
<tr>
<td></td>
<td>• Develop a restoration (and preservation) plan, including public access</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>• Planning Commission Consideration of the Regional Draft</td>
<td>Late 2009 - 2011</td>
</tr>
<tr>
<td></td>
<td>• Development of a Shoreline Master Program specific to Lacey</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Public hearings</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Planning Commission recommendation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• City Council approval</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• State approval</td>
<td></td>
</tr>
</tbody>
</table>

C. Methods and Sources of Information

The shoreline Public Access Plan compliments other Lacey planning documents that address our natural resource and environmentally sensitive areas. It provides the same emphasis and vision expressed throughout Lacey's comprehensive planning documents for the wise use, protection and conservation of natural resource and sensitive areas.

This overriding theme and culture is articulated throughout Lacey's Comprehensive Land Use Plan and its many elements including the Environmental Protection and Resource Conservation Plan, the Comprehensive Plan for Outdoor Recreation and the core Land Use element. These documents, and the vision they provide for the community, guide Lacey in its efforts to acquire, develop and manage shoreline properties for parks, habitat, and other recreational and cultural needs and activities.
D. Purpose, Content and Use of this Plan

Summary - This plan is meant to provide a comprehensive analysis of public access to shorelines, with several areas of focus.

One focus is a review of what public access includes and how it relates to goals for protection of shoreline natural functions and values. In defining what public access is, the Plan identifies various types of public access and use. In relationship to shoreline protection, the Plan discusses expectations for use based upon shoreline designation. The designation informs appropriate use and management over the long term.

Another focus is an analysis of shoreline access use and public value. This includes an inventory of existing public access, what types of access are of public value, what opportunities might exist for additional public access, and what criteria should be considered when planning and developing public access.

A third major focus is a discussion of strategies for acquiring public access. This reviews regulatory control, incentive based programs, and development of public property and how these might be utilized to achieve Lacey's public access goals.

A final focus is the articulation of specific public access goals and policies. Goals and policies cover a full range of public access issues.

Together discussion of these focus areas is intended to guide Lacey's effort in meeting the public access needs of the Lacey Community and the requirements of state law.

This plan builds upon the vision expressed in Lacey's existing Comprehensive Land Use Plan, the Comprehensive Plan for Outdoor Recreation and the Lacey Shoreline Master Program. These documents provide a vision for the long term management and protection of Lacey's shoreline resources.

Shoreline designation determines management options - This Plan discusses the balance needed between types and levels of intensity of public access and natural limitations of shoreline areas. Through the SMP, shorelines are given environment designations based upon specific characteristics and identified functions and values.

Long term management of these shoreline areas needs to consider both, and match access opportunities and activities with wise management and protection of the shorelines. This plan provides general guidance for the appropriate public use of shoreline areas while also protecting their functions and values over the long term.

Analysis of opportunity and need - This plan establishes a baseline inventory of existing public access sites to shorelines and examines what opportunities may be available for additional access. It sets forth criteria for classification of access types and provides criteria and a framework for use in assessing the public value of various future access opportunities. The plan also

The Plan identifies what public access opportunities are of value to the public and identifies opportunities ways to achieve additional access goals through shoreline development review and incentive programs.

Shoreline designation determines management options - This Plan discusses the balance needed between types of public access and natural limitations of shoreline designations to accommodate various uses. Shorelines are given designations based upon specific characteristics and each has identified functions and values.

Long term management of these shoreline areas needs to consider and match access opportunities. When
developing shoreline access the city needs to consider the type of access appropriate for wise management and protection of the shoreline. This plan provides general guidance for the appropriate public use of shoreline areas while also protecting the shoreline's functions and values over the long term.

Advantages of using a Public Access Plan as part of Lacey's shoreline program - Public access for every project or type of shoreline would be problematic. Some projects or shorelines may not be well suited for public access. State law allows local governments to consider public access comprehensively through a public access planning process rather than instituting uniform, site-by-site access requirements. Lacey has used this process to provide an assessment of public access opportunities with guidance on and identified issues to consider when public access will be required under shoreline regulatory authority as a condition of a permit.

Developing a public access plan creates an inventory of existing public access and identifies future needs and opportunities that can be implemented through shoreline development proposals with site specific assessments. The public access plan is the foundation for development of public access in the public interest.

Summary - This plan is meant to provide a comprehensive analysis of public access to shorelines, with several areas of focus.

One focus is a review of what public access looks like, and how it relates to goals for protection of shoreline natural functions and values. In defining what public access is, the Plan identifies various types of public access and use. In relationship to shoreline protection, the Plan discusses expectations for use based upon shoreline designation and classification. The classification determines what should be considered and how the shoreline is managed over the long term.

Another focus is an analysis of shoreline access requirements that may result from existing inventory of access, what is of public value, where priorities are and what criteria should be considered when planning. The Plan also identifies the benefits of different types of public access.

A third major focus is a discussion of strategies for expanding public access. The Plan assesses current, incentive based programs, and development of public property and how these might be utilized to achieve Lacey's public access goals.

A final focus is the articulation of specific program goals and objectives. Goals and criteria cover the full range of public access issues.

Together discussion of these focus areas is expected to provide Lacey with meaningful guidance on access needs of the Lacey Community and the requirements of public use.

This plan builds upon the vision expressed in Lacey's existing Comprehensive Land Use Plan, the Comprehensive Plan for Outdoor.

Exhibit C-8: Continuation of Recommended Change “App 1”
Recreation and the Lacey Shorline-Master Program. These documents provide a vision for the long-term management and protection of Lacey’s shoreline resources.
II. Shoreline Management Act Public Access Requirements

A. Three Broad Policies

The Shoreline Management Act has three broad policy goals:

1. **Encourage** give priority to water-dependent uses
2. Protect shoreline natural resources
3. Promote public access and enjoyment

B. Public Access Planning Process, Purpose and Use

As part of the public access policy, the Shoreline Management Act has language requiring local Shoreline Master Programs to contain a public access plan element that provides for public access to publicly owned shoreline areas. The public access plan element should be a comprehensive analysis of public access need and opportunity and a blueprint to guide the acquisition, development and management of public access to shoreline resources over the long term.

WAC 173-26-221 (4) Public Access (c) planning process to address public access, states "At a minimum, the public access planning should result in public access requirements for shoreline permits, recommended projects, port master plans, and/or actions to be taken to develop public shoreline access to shorelines on public property...."

WAC 173-26-221 (4) (d) standards further states that shoreline master programs should "provide standards for the dedication and improvement of public access in developments for water-enjoyment, water-related, and nonwater-dependant uses and for the subdivision of land into more than 4 parcels. In these cases, public access should be required except: (A) Where the local government provides more effective public access through a public access planning process described in WAC 173-26-221 (4)(c). ...."

These WAC provisions provide the City as an option of taking more flexibility in control over when and how to achieve its shoreline public access goals. Lacey will require public access when reviewing and applying regulatory conditions to development activity.
III. Type, Use and Value of Various Forms of Shoreline Public Access

Public access defined - As stated in the introduction of this plan, state law defines public access as "the ability of the general public to reach, touch, and enjoy the water's edge, to travel on the waters of the state, and to view the water and the shoreline from adjacent locations (WAC 173 26 221(4)(a))."

Shoreline access may take many forms and have many different uses associated with it and it may have a wide variety of infrastructure requirements and impacts.

Relationship to the City's Comprehensive Plan for Outdoor Recreation - The requirement to plan for public access is very close in concept to the City's planning process used to develop its Comprehensive Plan for Outdoor Recreation. This was once an optional GMA plan that the City developed years ago to accomplish park planning, including city park facilities and properties adjacent to shorelines and waterfront acquisition and development.

The City's Comprehensive Plan for Outdoor Recreation looks at the City's need for outdoor recreation and provides a comprehensive planning for the delivery of this service to the Lacey community. This purpose plan spans a wide range of public activities from what are termed passive (low activity non intrusive recreation use) to very intensive, high activity use; (Long Lake Park for example). This includes our waterfront front property like Long Lake and Wanchers Park, and it includes trail systems that provide shoreline access opportunities.

The Comprehensive Plan for Outdoor Recreation Plan has level of service standards, service area radius standards and a long term plan for management. Essentially it covers the City's need to provide recreation areas for the public, including waterfront active recreation opportunities. This aspect of public access planning does not need to be duplicated in this public access plan.

However, the Comprehensive Plan for Outdoor Recreation does not deal specifically with shoreline access, nor does it look at the types of small shoreline access opportunities that may be beneficial to Lacey and as may that might be acquired through regulatory action. This access plan will focus on classification of shoreline access types, inventory of existing and potential shoreline access, and strategies to acquire access.

Large significant access to shorelines, generally over an acre in size, will be considered a public responsibility and task requiring public ownership. Major recreation uses can be measured with nationally accepted level of service standards that look at acreage and active recreation land needs. However, there will be many smaller access opportunities that cannot be characterized using level of service standards that look at acreage and active recreation land needs. These opportunities may require a different level of service standard such as an access point for a certain length of shoreline area and a number of access points considered necessary for each reach. In considering level of service, this access plan will focus on basic access opportunities not covered with level of service standards that are already covered in the Comprehensive Plan for Outdoor Recreation. This Plan will address access only and will; please refer to the Comprehensive Plan for Outdoor Recreation in discussing and detailing goals and policies for larger, publically owned recreation areas. It will also have a focus on those smaller access opportunities that will typically be dealt with during review of privately initiated shoreline projects as discussed under implementation strategies in Section V of this Plan.

Identification and classification of various types of public shoreline access -
For classification of shoreline public access types we can fashion descriptions similar to how our Comprehensive Plan for Outdoor Recreation classifies parks. That system classifies parks according to intended use, size, and service radius. For shoreline public access, this plan will want to focus on intended use and public value. This focus provides a framework for assessing need and assigning priority for particular public access types and location.

**General Park Classifications** - Classification of parks considers intended use, client base, service radius and associated infrastructure and maintenance needs. Park types are divided into the following classifications as discussed in the 2010 Comprehensive Plan for Outdoor Recreation (see page 22 of that Plan);

A. **Plazas and Public Spaces** - such as children's playgrounds and downtown parks, located within 2 or 3 blocks of every home or business, typically provided by residential developments and retained, maintained and managed by their Homeowners Associations;

B. **Neighborhood parks** - of 5 to 20 acres, located within one-half mile of every residential area, with a minimum of 2 acres per every 1,000 residents;

C. **Community parks** - of 40 to 100 acres that offer a broad range of facilities located within 2 to 3 miles of every residential area, with a minimum of 3 acres per 1,000 residents;

D. **Regional parks** - offers recreation opportunities to a county wide or larger region;

E. Other - There are also special purpose facilities, linear parks, open space and conservancy site classifications, which also have specific purposes and use, design criteria, and infrastructure requirements.

**Proposed Shoreline Access Classifications** - For the purposes of classifying shoreline public access planning types, we can consider some of the same classification elements in regard to client base and location. A Shoreline public access may or may not have park activities associated with it, so an acreage per capita level of service measure as utilized for public parks will not be applicable to access opportunities unless they are being considered for park development.

However, there are also differences between shoreline public access and parks when considering for location requirements and service radius. For example, Shoreline access is geographically limited to the lakes and stream corridors. We cannot choose to place them within a certain distance to all neighborhood areas as we would with the design and acquisition of a neighborhood park site. When developing public shoreline access, we will generally need to assume it will take on a regional character.

For the purpose of classification of access to shorelines this plan can use the following descriptions:

- **Mini residential access, localized interest** - localized access generally designed for a specific development or neighborhood, may be part of a subdivision's required open space, and may be designed for active or passive recreation. Designed for a local service of homes within a 2-3 block radius, generally less than one acre. Infrastructure and maintenance issues are minimal and may be the responsibility of a Home Owners Association (HOA) if the access is owned by the association.

Both either implementation strategy (regulatory and/or incentive) strategies discussed in Section V of this plan could be utilized to acquire this type of access for the public;
• Mini residential access, regional interest, active or passive, associated facilities - Small opportunity designed to provide a recognized value to larger community (view point opportunity, rest stop along trail system, etc.), is normally but not necessarily associated with a trail system, park, or other recreational opportunity that can provide more than local visibility and access.
Infrastructure needs may vary depending upon intended activities/resources available. Active recreation opportunities need to be located along shoreline areas appropriately designated for active use (residential).

These opportunities should normally be pursued where available because associated recreation opportunities are of a finite nature limited by proximity to other supporting facilities and activities.

Both either implementation strategies (regulatory and/or incentive) strategies discussed in Section V of this plan could be utilized to acquire this type of access for the public.

- Mini access, regional interest, passive only - Small opportunity that provides view point, scientific classroom study or other non-invasive, passive activity valued by the public because of unique, rare, or sensitive features of the properties.

Infrastructure investment would be minimal except signing and control of access to protect shoreline values.

This type of access can be associated with a conservancy or natural zone designation where controlled access and protection of functions and values are still relatively un-impacted and conservation and protection is the highest priority.

Opportunities for this type of access are always valued and should be pursued where limited opportunities exist.

Implementation strategies - Regulatory and incentive strategies discussed in Section V of this plan could be utilized to acquire this type of access for the public.

- Neighborhood and Community Access - These facilities are designed for the entire community and impact to shorelines and use intensity and infrastructure needs would be expected to be relatively significant. A service radius of the entire community should be expected.

This designation needs to provide shoreline opportunities for the full community. It such an access will be utilized by persons who live in areas with no other shoreline access opportunities. It is expected needs to serve a range of intensities of access uses from passive to active. It may include swimming, boating and fishing. This type of access will require public ownership and infrastructure investment.

Strategies to acquire ownership for such types of access are discussed in Section V and could include under both implementation and regulatory and incentive strategies incentives should be utilized.

Note of caution when classifying access opportunities - This classification system is intended for a general guidance only. The needs and of opportunities for shoreline access will present themselves in a number of shapes and forms with many possible combinations of use opportunities.

Public Value used in evaluating access opportunities and priority - The same measures used to consider...
Level of service for general parks are not necessarily applicable to access alone. For access alone, acres would not necessarily be an applicable measure of need, benefit or public demand for the opportunity.

Value of a particular access is based upon what individual opportunities offer. Shoreline property is limited. Every development further limits options for acquisition of property for public use and access.

Comment [CB7]: Suggest striking this because it has been repeated 4 or 5 times.
Generally, because this is a limited resource that is becoming rarer and scarcer, it will be in the public's best interest to carefully review all development proposals to identify opportunities for public access and to take advantage of what is available before they are lost. A list of the criteria that will be used to consider the public value would and help assign priority to the qualities/features that would be most beneficial. These would include:

- Opportunity to **provide access** to a geographic area that does not have an existing access or the only access is limited, or is not convenient based upon physical limitations/boundaries/other barriers;
- Area needed to provide connectivity to other shoreline access areas;
- Particularly unique and interesting areas because of some feature;
- Sensitive areas that provide a particular rare view with or special habitat;
- Viewpoints providing quality opportunity for views of the water or waterfront area. This will be particularly valuable as part of a trail system, or simply sidewalk strolling experience for neighborhood walks;
- The site has opportunities for active recreation and can help meet identified further priorities and level of service demands of the Lacey community.

**Location considerations - Our City’s Comprehensive Plan for Outdoor Recreation also divides the City into service areas based upon proximity to residential areas, barriers for travel and access to various services.** When considering location for shoreline public access, **location criteria should address what portion of the lake/water body stream access is being provided access**. For example, three accesses at the same lake property will only provide one experience. Three accesses in different reaches of the lake or creek corridor may provide a more comprehensive access opportunity to the lake resources.

**Access Valuable opportunities** will provide connectivity to shorelines and properties adjacent to shorelines that can interconnect open space areas, parks, key neighborhood focus areas, trails and other sites of value. As the City reviews planning permits, including non shoreline permits, projects should be reviewed for connectivity opportunities using the Comprehensive Land Use Plan map and trail/pedestrian features as a guide.
IV. Existing Public Access Inventory and Opportunities for Additional Public Access along Shorelines

Identification of access, existing and potential - The City has identified the partially developed shoreline parcels and buildable land with the potential to develop and exceed the threshold expected to whereby consideration provision of public access is required (more than four lots). These areas may represent an opportunity for access and all should be reviewed and considered as such for opportunity as discussed in Section V of this plan. These areas are shown on maps A1-1 through A1-6.

In development of these maps, an underlying assumption was made that parcels under an acre with existing development will generally not be subject to considering public access condition standards. Subdivisions of up to The guidelines exempt short plat with no more than 4 parcels are not required to consider public access from access provision requirements. Lacey’s minimum lot size in the LD 0-4 zone, which generally applies to shoreline parcels within the City, is 7,500 square feet. Parcels under an acre in size with existing improvements are not expected to be able to carve out more than 4 lots in an infill scenario.

The resulting maps show parcels greater than 1 acre that are considered under developed (and may redevelop), or un-developed. Symbols have also been placed to identify existing public improvements and activities such as boat launch, swimming facility, water access, etc.

The process of conditioning a project to require access through regulatory review can only accomplish limited opportunities. Development of significant public access opportunities for active recreation, like Long Lake Park, requires City ownership and public resources to create and maintain.

It is expected that major access opportunities will be on public property and developed by the public. From this standpoint, every effort should be made to utilize special programs as discussed in Section V of this plan to acquire community access that is owned by the public. This may be possible through permit regulation, but only if innovative incentive programs are utilized.

The following Table 2 provides an inventory of lists existing public access opportunities to on various shorelines in Lacey and the Lacey growth area, which correspond to maps A1-1 through A1-6. These areas are displayed on maps A1-1 through A1-6 following the table. Table 2 also identifies in addition planned public access opportunities are identified as well as other opportunities that should be considered for future acquisition and provision of public access/open space/recreation activities.
**TABLE 2: EXISTING, PLANNED, AND OPPORTUNITIES FOR PUBLIC ACCESS FOR LACEY AND UGA.**

<table>
<thead>
<tr>
<th>Shoreline</th>
<th>Existing Public Access</th>
<th>Planned Public Access</th>
<th>Other Opportunities</th>
<th>Goals for specific water body</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nisqually Reach (Map A1-5)</td>
<td>The public has accessed this marine shoreline for many years. However, the Planned Community developed on the property only has the open space, associated trail system and marine shoreline as open space partly owned by the Home Owner Association. No official “General Public” access is shown on plat documents. At this time the Home Owners Association has not controlled access to the beach and the trail system is still accessed by the general public.</td>
<td>N/A</td>
<td>None</td>
<td>Maintaining public access to marine shoreline for viewing. Preservation of this marine area in its natural state. Work with the Hawks Prairie Planned Community Home Owners Association to maintain the access to the beach the public has enjoyed over the last several decades. Consider working with the Home Owners Association to take ownership of the property for long term maintenance and management.</td>
</tr>
<tr>
<td>Shoreline</td>
<td>Existing Public Access</td>
<td>% and Length of Shoreline in Public Ownership</td>
<td>Planned Public Access</td>
<td>Other Opportunities</td>
</tr>
<tr>
<td>---------------------------</td>
<td>------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rivers/Streams</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Woodland Creek (Map A1-6)</td>
<td>Pleasant Glade Park (City of Lacey) St. Martin's University has walking trails in the wetland area south of Interstate 5 used for campus activities and research.</td>
<td>Urban Trails – preserve the Woodland/Mill Creek Corridor for public access and resource conservation.</td>
<td>The Lacey Comprehensive Land Use Plan shows a future trail system throughout the Woodland Creek corridor. Currently the City has a park and trail system around Lake Lois. These trails tie into trails through Saint Martin's property. Saint Martin's property, north of Martin Way, is the start of the Woodland Creek shoreline jurisdiction. This area has a system of trails that provide the opportunity to create a partnership with Saint Martin's to provide access for educational opportunities consistent with Saint Martin's campus policy and trail use.</td>
<td></td>
</tr>
<tr>
<td>Shoreline</td>
<td>Existing Public Access</td>
<td>% and Length of shoreline in public ownership</td>
<td>Planned Public Access</td>
<td>Other Opportunities</td>
</tr>
<tr>
<td>----------------</td>
<td>------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------</td>
<td>-------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Lakes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chambers Lake</td>
<td>Chehalis Western Trail (Thurston County) Boat ramp (State)</td>
<td>Reserved pending GIS calculation</td>
<td>Plans for the Chambers Lake Open Space include public access (City of Olympia).</td>
<td>A large parcel containing a designated wetland on the east side of Chambers Lake was designated open space as part of a plat dedication. This property may have an opportunity for development of public access and use in the future. This lake is also adjacent to the Chehalis Western Trail providing opportunities for connectivity.</td>
</tr>
</tbody>
</table>

Chambers Lake (Map A1-1)

| Hicks Lake    | Wanchers Park (City of Lacey) Boat Ramp (State) | Reserved pending GIS calculation | South Hicks Lake Wetlands (City of Lacey) – plans to have a connected trails system between the park, boat ramps, and wetlands. | As part of plating requirements the city acquires wetland areas that are adjacent to the lake to facilitate preservation and proper management of these resources. This provides opportunities for various forms of passive recreation opportunities for the public. | Fishing, swimming, viewing at established Wanchers Park. Connectivity to planned trails surrounding the associated wetland systems and establishment of trail points with habitat views. Ownership of 100% of associated wetlands and 30% or more of waterfront shoreline;10% in residential designated |

Hicks Lake (Map A1-2)
<table>
<thead>
<tr>
<th>Shoreline</th>
<th>Existing Public Access</th>
<th>% and Length of shoreline in public ownership</th>
<th>Planned Public Access</th>
<th>Other Opportunities</th>
<th>Goals for specific water body</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long Lake (Map A1-3)</td>
<td>Long Lake Park (City of Lacey) (swimming, sunbathing, volleyball). Boat ramp (state)</td>
<td>Reserved pending GIS calculation</td>
<td>Long Lake park expansion to adjacent parcels.</td>
<td>Several portions of the wetlands on the south west side and at the south end of Long Lake were acquired as plat requirements and are owned by the City of Lacey. These properties have opportunity for a trail around the outside edge of the wetland buffer that could also provide access to the lake. This area is considered sensitive but could provide passive recreation opportunity.</td>
<td>Swimming, boating, fishing, views, connectivity to trail systems, preservation of associated wetland areas. Ownership of 10% of shoreline waterfront in residential areas for active use and 100% of shoreline in designated Natural areas and associated wetland systems for connectivity to trails and Preservation.</td>
</tr>
<tr>
<td>Pattison Lake (Map A1-4)</td>
<td>Lake Pointe Open Space Institutional Designation</td>
<td>Reserved pending GIS calculation</td>
<td></td>
<td>There is a Homeowners association open space on the west side of the lake where the tip has lake frontage. This site may provide an opportunity for future limited public access. This open space corridor has limitations.</td>
<td></td>
</tr>
<tr>
<td>Shoreline</td>
<td>Existing Public Access</td>
<td>% and Length of Shoreline in Public Ownership</td>
<td>Planned Public Access</td>
<td>Other Opportunities</td>
<td>Goals for Specific Water Body</td>
</tr>
<tr>
<td>-----------</td>
<td>------------------------</td>
<td>---------------------------------------------</td>
<td>-----------------------</td>
<td>-------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Southwick (Map A1-2)</td>
<td>The City of Lacey and the North Thurston Public Schools own the majority of the property immediately adjacent to the south end of Southwick Lake. With the exception of one property, these properties run contiguous to one another and provide lake access. The City of Lacey acquired its wetland property and buffers along the south end of Southwick lake as plat requirements, when properties developed in the late 1990s. North Thurston's wetland area was reserved pending GIS study.</td>
<td>No official plans have been developed</td>
<td>Lacey currently owns two open space parcels along the lake. These could accommodate a section of trail around the lake for public use at some time in the future. A major city park (Rainier Vista) is immediately across Ruddell Road to the west and could be used as a staging area for a trail system around the lake.</td>
<td>Preserve lake shoreline in natural state for views. Connectivity to surrounding residential areas and Rainier Vista park.</td>
<td></td>
</tr>
</tbody>
</table>

Comment [CBB]: For consistency with this same column in the rest of the table, suggest leaving this field blank or put this same statement in the other cells.
dedicated to open space as a requirement when it established a school on the property.

### TABLE 3: COMMUNITY-ACTIVE RECREATION USE: NEED AND PRIORITY ASSESSMENT

<table>
<thead>
<tr>
<th>Swimming</th>
<th>Boating</th>
<th>Fishing</th>
<th>Trails</th>
<th>General Access</th>
</tr>
</thead>
<tbody>
<tr>
<td>An opportunity for swimming along Hicks Lake has been identified as having benefit for Lacey’s recreation program. Wancher’s park is currently being evaluated for having an area designated for this use.</td>
<td>Lacey’s lakes are relatively small and not conducive to motor boating, given other uses present. Opportunities currently available at Long Lake, Hicks Lake and Pattison Lake. Additional facilities need to be reviewed and a public need demonstrated before acquiring new sites for this use.</td>
<td>The Parks Department has identified significant use of its existing facilities at the Community Center and has plans for addition of public fishing piers at lakes where it can be accommodated given the shoreline functions and values. Any opportunities to provide area for this amenity should be reviewed for potential.</td>
<td>Trails are planned to be added as identified in Lacey’s Comprehensive Land Use Plan map. Lacey’s vision is for interconnection of trail systems around Hicks and Southwick Lakes, Woodland Creek and public access at Butterball Cove. Pedestrian trails that tie into key neighborhood access areas, parks and other neighborhood focus points are a priority.</td>
<td>A full range of access points are needed to provide convenient and interconnected access to all of Lacey’s lakes and other appropriate shoreline areas as identified on the Lacey Comprehensive Land Use Plan map. All projects near a designated trail area should be reviewed for potential use and benefit.</td>
</tr>
</tbody>
</table>

NOTE: Additional material and periodic updates will be added pending update of the Comprehensive Plan for Outdoor Recreation and definition of community needs and priorities for these facilities.

**Comment [CB9]:** Suggest deleting; there is no assessment of priorities in this table.
### TABLE 4: IDENTIFIED CRITERIA/PERCEIVED NEED FOR SPECIFIC PUBLIC RECREATION/ACCESS OPPORTUNITIES

NOTE: Additional activities/criteria will be updated with the update of the Comprehensive Plan for Outdoor Recreation and Development of Updated Priorities

<table>
<thead>
<tr>
<th>Use</th>
<th>Swimming</th>
<th>Boating</th>
<th>Fishing</th>
<th>Trails</th>
<th>General Access</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description and discussion of need:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>An opportunity at each lake capable of supporting a community swimming facility; Expected use of Hicks Lake as an additional resource to supplement community’s opportunity at Long Lake.</td>
<td></td>
<td></td>
<td></td>
<td>Additional fishing opportunities needed for the community. At least one public fishing pier for each lake that is capable of supporting this activity and opportunity for two if the opportunity becomes available. Demand for this activity would support a number of additional opportunities at Long, Hicks, Pattison and potentially Chambers Lakes.</td>
<td>One access for every 1/4 mile of shoreline and at least one for each reach with distinct characteristics. Trail access with views or rest stops that may or may not provide direct access will be needed. The need for connectivity is expected to be significant and every project should be evaluated for its potential benefit and suitability for this function.</td>
</tr>
<tr>
<td>Assessment</td>
<td>Unmet need</td>
<td>Unmet need</td>
<td>Unmet need</td>
<td>Unmet need</td>
<td>Unmet need</td>
</tr>
</tbody>
</table>

Exhibit C-8: Continuation of Recommended Change “App 1”
V. Approaches and Strategies to Achieve Goals for Public Access and Protection and Management of Lacey's Shorelines

A. Regulatory Mandate

Shoreline regulation and jurisdiction - State law requires the review and regulation of land use on property within the shoreline jurisdiction. There is an established permitting and review process required for all projects being developed within this jurisdiction (within 200 feet of the ordinary high water mark of a designated shoreline management water body).

As part of this review process, with a few exceptions, there is a requirement to review proposed projects and apply a condition for appropriate public access.

This review process, and guidance under WAC 173.26.221, allows Lacey to review the proposal, the specific project site, applicable environmental criteria and assess the need and potential for establishing public access on the site as a condition of the permit.

Considerations of the suitability of the site for public access opportunities. Generally, when new public access opportunities are identified, the City will public access planning needs to review individual site suitability and potential impacts to the shoreline environment. This evaluation should include the suitability of the site to accommodate improvements required for the public access, considering its proposed use, and the shoreline designation and environmental sensitivity. In addition, public access planning, for sites being evaluated as part of a permit requirement, should be integrated with and support the goals of the private applicant.

Environmental protection concerns - As part of a site's evaluation, the site must be judged for its suitability for a range of public access and use needs; active water recreation or passive recreation, view opportunities only or full conservation with no physical interaction with the shoreline. Generally, only public access use suitable compatible with for the protection of the shorelines identified functions and values should be considered. If public benefit continues to create environmental costs, no net loss may be achieved on a community level.

Accommodating infrastructure and design needs of the public access use - Along with considerations of suitability for protection of shorelines there are a number of criteria for suitability that go with accommodating various public use scenarios; will there be a need for parking and can it be accommodated, is there a need for sanitary facilities, can public access be designed to complement the existing neighborhood character and design, or would it disrupt the livability of residents and compromise privacy and enjoyment of surrounding residential homes? Is there an opportunity for "eyes" on the area to provide regular monitoring and surveillance of the area, or would there be a security risk?

Integration with the applicant's needs and goals - In addition to environmental and public design considerations, a project needs to consider goals of the private land owner. Without compromising overall goals of the public access program, individual access needs should accommodate goals of the applicant. The applicant's proposed project and public access use and design should both be evaluated for opportunities where one can complement the other. Every effort should be made to achieve both the goals of the applicant and the needs of the public.

Where a residential subdivision is involved, a design for public access should be developed that will provide what home buyers would consider an amenity to the neighborhood. It must consider the values residents consider important and address privacy, security, aesthetics and long term management and
maintenance. Most importantly, it must add what residents will consider value to the investment they have made in their home.

Something that adds value to the development and is seen as a long term asset will sell itself. A poorly designed concept, or request for public access for an unquantified use and undisclosed need, will not be as palatable to our development community. In the worse case, a poorly conceived condition for public access might be considered a taking and devaluing of their product and sales potential.

B. Incentive Based Programs

Generally - Another strategy Lacey will use to achieve public access and open space objectives is the development and implementation of unique innovative programs to provide incentives for land owners to dedicate public access and shorelines property to the city for public use and long term protection and management.

These programs will focus on providing incentives to property owners that give the owner special value and opportunities in exchange for the provision of shoreline property and access that provides a special benefit and asset to the public.

Incentive Dedication Density Bonus Strategy - During the beginning stages of the Shoreline Master Program update, advanced planners from the three cities of Lacey, Olympia and Tumwater met to discuss Regional's preliminary work on the first draft being produced with the Department of Ecology's grant. Planners met on a regular basis to review the preliminary work, identify issues and consider new opportunities and strategies.

One idea discussed was the concept of density incentives for a land owner/developer that dedicated shoreline area and public access. In developing this idea, a set of criteria was developed considered necessary for an incentive program to work. These included the following points:

A. Incentive programs should provide an option that is superior for the shorelines considering, environmental protection and public use/interest, that meets all requirements of the Shoreline Management Act and furthers its spirit and intent;

B. The opportunity for the developer should be superior from a market and business standpoint to result in an independent decision to pursue the program opportunity;

C. Any development resulting from the program should be compatible and further the intent of GMA plans and further the concepts the city is emphasizing in implementation of GMA and its community vision;

D. Any development that results from the program should be compatible and complementary to the existing neighborhood in which it is located;

E. Innovative approaches and unique ideas should be encouraged to find ways to make preferred concepts work. Flexibility in general code standards should be permitted with an emphasis on design for compatibility with surrounding developments and functionality considering livability and improvements to a resident's quality of life;

These same points are adopted as goals and policies in Section VI of this plan.
Within this framework, Lacey should develop an optional program for a land owner to dedicate shoreline property and the right for public access for significantly enhanced development opportunity.

Shoreline regulations already restrict what can be developed within the shoreline jurisdiction and the master program has regulatory authority for application of conditions for public access. In looking at development opportunity for shoreline areas there are many restrictions that impact density and location. If wetlands are present development is prohibited within the wetland and its associated buffer.

The incentive program could provide a developer another option to consider when weighing these standards and restrictions in designing a development that will be successful in the market place. In exchange for dedication of the shoreline portion of an ownership to the City, an option with significant benefits over a traditional development approach can be encouraged. Opportunity might include the following:

A. Significantly enhanced density, over what the underlying shoreline and zoning designation would normally permit.

B. Opportunity for a project designed with a mix of uses not normally permitted within the underlying zoning district. This might be a range of residential forms and types or limited commercial activity consistent with village concepts;

C. Relaxation of normal zoning standards in favor of a design focus that can achieve Comprehensive Land Use Plan goals for compatibility and functionality. This needs to result in a higher quality of life and a superior neighborhood experience for residents.

D. Opportunity to transfer benefits of the program for a project throughout the city consistent with the framework of this program considering the emphasis on GMA principals and the vision for neighborhoods articulated in the Comprehensive Land Use Plan.

E. Opportunity to build a project designed with these special features on the subject property if the physical development takes place outside the shoreline jurisdiction on the sites upland areas;

F. Potential opportunity to build a portion of a project within the shorelines jurisdiction if the fronting shoreline area is dedicated to the public providing significant public benefit and all other public interest goals of the program are satisfied and all shoreline requirements of the Shoreline Master program are met.

Implementation of this program can be accomplished with specific Comprehensive Land Use Plan goals and policies providing the intent and expectations of the program. These relate to the community's vision for quality neighborhoods and compliance with principals and strategies of GMA.

In addition, zoning provisions can be developed to provide for this program throughout a variety of zones and in a variety of areas as a permitted use or in overlay designations or "receiving areas".

Design expectations exist in the design chapter to require a design considering both aesthetic values and functionality for enhanced livability.
C. Use of Shoreline Classifications and Designation for Best Use and Management of Shorelines

An important emphasis of shorelines management is protection of the natural values and functions of our shorelines. As part of the Shoreline Master Program update, Lacey did an inventory and classification, characterization of its shoreline areas. Through evaluation of individual reaches shorelines were assigned, classified according to designations appropriate for shoreline use and environmental protection.

Appropriate designations have been assigned based upon the evaluation of functions and values and what the science suggests for management of shoreline over the long term. Designations applied to Lacey's shorelines include Natural, Urban Conservancy, and Shoreline Residential.

These have varying degrees of intensity of use, going from very restrictive under the Natural designation, to accommodating significant residential development under the residential designation. As access opportunities become available a one size fits all approach will not be an acceptable way of establishing and developing public access and public use. When sites are reviewed for public access opportunities, the shoreline designation applied to an individual site should guide the type and intensity of public use considered.

Generally the Natural designation should not accommodate intensive recreation uses. These areas are sensitive, usually have significant wetland resources in addition to shorelines and because of sensitive aspects are still relatively undeveloped. These types of areas need protection and are opportunities for passive activities with view points and trails providing views of the shorelines. They will generally not be well suited for active water related activities.

The Urban Conservancy environment, as the name implies, is also a designation where restrictions are applied because of the value and sensitivity of shoreline resources and a need for care in management. This designation is also generally not an area expected to accommodate intensive public or private use.

The areas designated Shoreline Residential is predominantly developed out with intensive residential use of the shorelines. These areas may be suited for intensive use and recreation activity and can be worked into development concepts as part of a development recreation/open space requirement.
VI. Goals and Policies Concerning Public Access to Shorelines in Lacey and the Lacey Urban Growth Area: These Lacey specific goals and policies supplement the more general goals and policies recommended by the State guidebook which are found in the Shoreline Master Program in Section 17.46.000

1. Goal - Provide a full range of shoreline access and use for the Lacey community.
   A. Policy - Consider the type of public shoreline access that is needed for the Lacey community; passive, active, view points, beach recreation etc. Determine what access opportunities exist and what additional opportunities should be pursued based upon value to the public.
   B. Policy - Develop an inventory of existing and public access to shorelines. Develop an inventory of potential opportunities for public access that Lacey could pursue in achieving its public access goals.
   C. Policy - To support implementing efforts, particularly regulatory actions of conditioning permits, include a discussion of identified public access opportunities in planning documents with justification and expectations for acquisition and development; The Comprehensive Land Use Plan; the Comprehensive Plan for Outdoor Recreation and the Capital Facilities element.
   D. Policy - Consider a range of strategies and programs to acquire valued public access opportunities.
   E. Policy - Actively pursue public access opportunities with a variety of special programs such as the incentive dedication strategy.

2. Goal - Develop special innovative program(s) to achieve Lacey's public access goals with incentives attractive to the development community.
   A. Policy - Craft Incentive programs to gain needed public access opportunities that provide a development option that is superior for the shorelines considering, environmental protection and public use/interest, that meet all requirements of the Shoreline Management Act and furthers its spirit and intent;
   B. Policy - Develop program strategies that offer opportunity for the developer that is superior from a market and business standpoint and will result in a developer's independent decision to pursue the program opportunity;
   C. Policy - Any development resulting from an incentive program needs to be compatible and further the intent of GMA plans and further the concepts the city is emphasizing in implementation of GMA and its community vision;
   D. Policy - Any development that results from an incentive program needs to be compatible and complementary to the existing neighborhood in which it is located;
   E. Policy - Innovative approaches and unique ideas should be encouraged to find ways to make preferred concepts work. Flexibility in general code standards should be permitted with an emphasis on design for compatibility with surrounding developments and functionality considering livability and improvements to a resident's quality of life;

3. Goal - Establish a shoreline access program that compliments the need for shorelines protection and recovery and restorative planning.
   A. Policy - Lacey will manage shoreline access opportunities consistent with the emphasis to protect, restore and improve our shorelines identified functions and values.
   B. Policy - When applying conditions for public access, Lacey will select public access sites appropriate to the shoreline designation and requirements for its environmental protection and maintenance of its natural functions and values.
   C. Policy - Site evaluation shall include a site's potential to accommodate the improvement requirements necessary for various public access activities.
D. Policy - Public access facilities such as fishing piers may be developed over water if ecological impacts are mitigated.

4. Goal - Implement a shoreline access strategy that meets City of Lacey needs through permit administration to achieve its shoreline access goals while being sensitive to needs of landowners.
   A. Policy - Lacey will demonstrate need for an access to provide the applicant a reason, purpose and justification for public access;
   B. Policy - Lacey will provide specificity of the use and intended design for the applicant to assess and have a comfort level with successful integration of the intended public access with his/her own goals and objectives.
   C. Policy - Lacey will increase public access to publically owned shorelines.
   D. Policy - Lacey will consider objectives of private projects and landowners as it develops plans for public access and as much as possible, without compromising Lacey's public access goals and goals of the state, will design the access and long term management in a way that accomplishes both.
   E. Policy - Public access developed as part of a shoreline permit requirement should be designed to enhance the proposed project by adding value to the property for current and future residents of the site/ownership/development. Ideally, the relationship should be considered a partnership between the developer and the city, where the establishment of public access tied into other public amenities (regional trail, lake trail, parks etc.) will improve a projects marketability and attractiveness, adding value to the proposed development by establishing an amenity residents of the site/ownership/development will see as added value to their home.
VII. Resources

City of Lacey, 2008. Lacey Comprehensive Plan, (including Capital Facilities Chapter).
Thurston Regional Planning Council, 2008. Draft Shoreline Inventory for the Cities of Lacey, Olympia, and Tumwater and their UGAs.
Thurston County, 2008. Thurston County Comprehensive Plan (including Capital Facilities Chapter).
GREEN SHORELINE PRACTICES: SHORELINE PLANTINGS: PLANT LIST

Trees

<table>
<thead>
<tr>
<th>Latin name</th>
<th>Common Name</th>
<th>Exposure</th>
<th>Moisture</th>
<th>Height</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abies procera</td>
<td>Noble Fir</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>200</td>
</tr>
<tr>
<td>Acer circinatum</td>
<td>vine maple</td>
<td>part shade/shade</td>
<td>dry/moist</td>
<td>25</td>
</tr>
<tr>
<td>Acer macrophyllum</td>
<td>bigleaf maple</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>105</td>
</tr>
<tr>
<td>Alnus rubra</td>
<td>red alder</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>70</td>
</tr>
<tr>
<td>Betula papyrifera</td>
<td>paper birch</td>
<td>sun</td>
<td>moist</td>
<td>80</td>
</tr>
<tr>
<td>Crataegus douglasii</td>
<td>black hawthorn</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>25</td>
</tr>
<tr>
<td>Crataegus douglasii var suksdorfi</td>
<td>Suksdorf’s hawthorn</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>20</td>
</tr>
<tr>
<td>Fraxinus latifolia</td>
<td>Oregon ash</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>70</td>
</tr>
<tr>
<td>Malus fusca</td>
<td>Pacific crabapple</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>40</td>
</tr>
<tr>
<td>Picea sitchensis</td>
<td>Sitka spruce</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>200</td>
</tr>
<tr>
<td>Populus trichocarpa</td>
<td>black cottonwood</td>
<td>sun</td>
<td>moist</td>
<td>100</td>
</tr>
<tr>
<td>Populus tremuloides</td>
<td>trembling aspen</td>
<td>sun</td>
<td>dry/moist</td>
<td>75</td>
</tr>
<tr>
<td>Pseudotsuga menziesii</td>
<td>Douglas fir</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>200</td>
</tr>
<tr>
<td>Rhamnus purshiana</td>
<td>cascara</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>30</td>
</tr>
<tr>
<td>Salix spp.</td>
<td>willow</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>6-40</td>
</tr>
<tr>
<td>Thuja plicata</td>
<td>Western red cedar</td>
<td>part shade/shade</td>
<td>moist/wet</td>
<td>200</td>
</tr>
<tr>
<td>Tsuga heterophylla</td>
<td>Western hemlock</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>180</td>
</tr>
</tbody>
</table>
## Groundcover

<table>
<thead>
<tr>
<th>Latin name</th>
<th>Common Name</th>
<th>Exposure</th>
<th>Moisture</th>
<th>Height</th>
</tr>
</thead>
<tbody>
<tr>
<td>Achlys triphylla</td>
<td>vanilla leaf</td>
<td>part shade/shade</td>
<td>moist</td>
<td>1</td>
</tr>
<tr>
<td>Allium cernuum</td>
<td>nodding onion</td>
<td>sun</td>
<td>dry/moist</td>
<td>1</td>
</tr>
<tr>
<td>Asarum caudatum</td>
<td>wild ginger</td>
<td>part shade/shade</td>
<td>moist</td>
<td>0.5</td>
</tr>
<tr>
<td>Camassia quamash</td>
<td>common camas</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>1</td>
</tr>
<tr>
<td>Cornus canadensis</td>
<td>bunchberry</td>
<td>part shade/shade</td>
<td>moist</td>
<td>0.5</td>
</tr>
<tr>
<td>Fragaria chiloensis</td>
<td>beach strawberry</td>
<td>sun/part shade</td>
<td>dry</td>
<td>1</td>
</tr>
<tr>
<td>Mahonia nervosa</td>
<td>low Oregon grape</td>
<td>sun/shade</td>
<td>dry/moist</td>
<td>2</td>
</tr>
<tr>
<td>Maianthemum</td>
<td>false lily-of-the-valley</td>
<td>part shade/shade</td>
<td>dry/moist</td>
<td>1</td>
</tr>
<tr>
<td>Maianthemum</td>
<td>false lily-of-the-valley</td>
<td>part shade/shade</td>
<td>dry/moist</td>
<td>1</td>
</tr>
<tr>
<td>Vancouveria hexandra</td>
<td>inside-out flower</td>
<td>part shade/shade</td>
<td>moist</td>
<td>1</td>
</tr>
</tbody>
</table>
## Shrubs

<table>
<thead>
<tr>
<th>Latin name</th>
<th>Common Name</th>
<th>Exposure</th>
<th>Moisture</th>
<th>Height</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Amelanchier alnifolia</em></td>
<td>Saskatoon serviceberry</td>
<td>sun/shade</td>
<td>dry/moist</td>
<td>20</td>
</tr>
<tr>
<td><em>Andromeda polifolia</em></td>
<td>bog rosemary</td>
<td>sun/part shade</td>
<td>wet</td>
<td>1.5</td>
</tr>
<tr>
<td><em>Cornus stolonifera sericea</em></td>
<td>red-osier dogwood</td>
<td>sun/shade</td>
<td>moist/wet</td>
<td>15</td>
</tr>
<tr>
<td><em>Corylus californica</em></td>
<td>beaked hazelnut</td>
<td>sun/shade</td>
<td>dry/moist</td>
<td>20</td>
</tr>
<tr>
<td><em>Gaultheria shallon</em></td>
<td>salal</td>
<td>part shade/shade</td>
<td>dry/moist</td>
<td>5</td>
</tr>
<tr>
<td><em>Holodiscus discolor</em></td>
<td>discolor-oceanspray</td>
<td>sun/shade</td>
<td>dry</td>
<td>15</td>
</tr>
<tr>
<td><em>Lonicera involucrata</em></td>
<td>black twinberry</td>
<td>sun/part shade</td>
<td>dry/wet</td>
<td>8</td>
</tr>
<tr>
<td><em>Mahonia aquifolium</em></td>
<td>tall Oregon grape</td>
<td>sun/shade</td>
<td>dry/moist</td>
<td>8</td>
</tr>
<tr>
<td><em>Philadelphus lewissii</em></td>
<td>mock-orange</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>9</td>
</tr>
<tr>
<td><em>Physocarpus capitatus</em></td>
<td>pacific ninebark</td>
<td>sun/shade</td>
<td>moist/wet</td>
<td>13</td>
</tr>
<tr>
<td><em>Rhododendron macrophyllum</em></td>
<td>pacific rhododendron</td>
<td>part shade/shade</td>
<td>dry/moist</td>
<td>20</td>
</tr>
<tr>
<td><em>Ribes sanguineum</em></td>
<td>red-flowering currant</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>6</td>
</tr>
<tr>
<td><em>Rosa gymnocarpa</em></td>
<td>bald-hip rose</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>5</td>
</tr>
<tr>
<td><em>Rosa pisocarpa</em></td>
<td>cluster rose</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>6</td>
</tr>
<tr>
<td><em>Rosa nutkana nootka</em></td>
<td>Nootka rose</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>10</td>
</tr>
<tr>
<td><em>Rubus spectabilis</em></td>
<td>salmonberry</td>
<td>sun/shade</td>
<td>moist/wet</td>
<td>10</td>
</tr>
<tr>
<td><em>Salix scouleriiana</em></td>
<td>willow</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>25</td>
</tr>
<tr>
<td><em>Sambucus racemosa</em></td>
<td>red elderberry</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>20</td>
</tr>
<tr>
<td><em>Sorbus sitchensis</em></td>
<td>sitka mountain-ash</td>
<td>sun/part shade</td>
<td>moist</td>
<td>10</td>
</tr>
<tr>
<td><em>Spiraea douglasii</em></td>
<td>spiraea</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>12</td>
</tr>
</tbody>
</table>

**Comment [CB1]:** Suggesting these be deleted; there is no footnote indicating what the asterisk represents.
<table>
<thead>
<tr>
<th>Symphoricarpos albus</th>
<th>snowberry</th>
<th>sun/shade</th>
<th>dry</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vaccinium ovatum</td>
<td>evergreen huckleberry</td>
<td>part shade</td>
<td>dry</td>
<td>12</td>
</tr>
<tr>
<td>Viburnum edule</td>
<td>highbush cranberry</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>12</td>
</tr>
</tbody>
</table>
### Perennials

<table>
<thead>
<tr>
<th>Latin name</th>
<th>Common Name</th>
<th>Exposure</th>
<th>Moisture</th>
<th>Height</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aruncus <em>Sylvester</em></td>
<td>goat’s beard</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>5</td>
</tr>
<tr>
<td><em>Aster subspicatus</em></td>
<td>Douglas’ aster</td>
<td>sun/part shade</td>
<td>moist</td>
<td>2</td>
</tr>
<tr>
<td><em>Athyrium filix-femina</em></td>
<td>lady fern</td>
<td>sun/shade</td>
<td>moist/wet</td>
<td>4</td>
</tr>
<tr>
<td><em>Aquilegia Formosa</em></td>
<td>western columbine</td>
<td>sun/part shade</td>
<td>moist</td>
<td>2</td>
</tr>
<tr>
<td><em>Blechnum spicant</em></td>
<td>deer fern part</td>
<td>shade/part shade</td>
<td>moist/wet</td>
<td>3</td>
</tr>
<tr>
<td><em>Carex canescens</em></td>
<td>grey sedge</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>2</td>
</tr>
<tr>
<td><em>Dicentra Formosa</em></td>
<td>pacific bleeding heart</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>1</td>
</tr>
<tr>
<td><em>Iris tenax</em> Oregon</td>
<td>Oregon iris</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>1</td>
</tr>
<tr>
<td><em>Lupinus polyphyllus</em></td>
<td>large-leaved lupine</td>
<td>sun</td>
<td>moist/wet</td>
<td>4</td>
</tr>
<tr>
<td><em>Mimulus guttatus</em></td>
<td>yellow monkey-flower</td>
<td>sun/shade</td>
<td>moist/wet</td>
<td>2</td>
</tr>
<tr>
<td><em>Polystichum munitum</em></td>
<td>sword fern</td>
<td>part shade/shade</td>
<td>moist</td>
<td>4</td>
</tr>
<tr>
<td><em>Sisyrinchium californicum</em></td>
<td>golden-eyed-grass</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>1</td>
</tr>
<tr>
<td><em>Sisyrinchium idahoense</em></td>
<td>Idaho blue-eyed-grass</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>2</td>
</tr>
<tr>
<td><em>Solidago Canadensis</em></td>
<td>goldenrod</td>
<td>sun/part shade</td>
<td>dry/moist</td>
<td>4</td>
</tr>
<tr>
<td><em>Trillium ovatum</em></td>
<td>western trillium</td>
<td>part shade/shade</td>
<td>moist/wet</td>
<td>1.5</td>
</tr>
</tbody>
</table>
### Emergent Aquatic Plants

<table>
<thead>
<tr>
<th>Latin name</th>
<th>Common Name</th>
<th>Exposure</th>
<th>Moisture</th>
<th>Height</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Alisma plantago-aquatica</em></td>
<td>water-plantain</td>
<td>sun/part shade</td>
<td>wet</td>
<td>3</td>
</tr>
<tr>
<td><em>Carex kelloggii</em></td>
<td>Kellogg’s sedge</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>2</td>
</tr>
<tr>
<td><em>Carex obnupta</em></td>
<td>slough sedge</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>2</td>
</tr>
<tr>
<td><em>Carex stipata</em></td>
<td>saw beak sedge</td>
<td>sun/part shade</td>
<td>moist/wet</td>
<td>2</td>
</tr>
<tr>
<td><em>Sagittaria latifolia</em></td>
<td>arrowhead</td>
<td>sun/part shade</td>
<td>wet</td>
<td>3</td>
</tr>
<tr>
<td><em>Scirpus microcarpus</em></td>
<td>small-fruited bulrush</td>
<td>sun/part shade</td>
<td>wet</td>
<td>3</td>
</tr>
<tr>
<td><em>Scirpus acutus</em></td>
<td>hardstem bulrush</td>
<td>sun</td>
<td>wet</td>
<td>9</td>
</tr>
<tr>
<td><em>Typha latifolia</em></td>
<td>cattail</td>
<td>sun/part-shade</td>
<td>wet</td>
<td>8</td>
</tr>
</tbody>
</table>
Appendix 3 - Restoration Plan for the City of Lacey and the Lacey Urban Growth Area
Updated information and analysis June 2010

June 2010
Draft
Shoreline Master Program

Exhibit C-10: Continuation of Recommended Change “App 3”
CITY OF LACEY MISSION

Our mission is to enrich the quality of life in Lacey for all our citizens. To build an attractive, inviting, and secure community; We pledge to work in partnership with our residents to foster community pride, to develop a vibrant, diversified economy, to plan for the future, and to preserve and enhance the natural beauty of our environment.
LACEY CITY COUNCIL

Tom Nelson, Mayor
Virgil Clarkson, Deputy Mayor
Mary Dean
Jason Hearn
Ron Lawson
Cynthia Pratt
Andy Ryder

LACEY PLANNING COMMISSION

O'Dean Williamson, Chair
Donald Melnick, Vice Chair
Carolyn St Claire
Bruce Freeland
Kenneth Mitchell
Raymond Payne
Richard Sovde
Gail Madden
Lenny Greenstein

LACEY CITY MANAGER

Greg J. Cuioio

LACEY COMMUNITY DEVELOPMENT DEPARTMENT

Rick Walk, AICP, Community Development Director David R. Burns, AICP, Principal Planner, lead staff on update Ryan Andrews, Associate Planner
Sarah Schelling, Associate Planner
Samra Seymour, Associate Planner
Jolene Hempel, Permit Technician
Leah Bender, Permit Technician
Acknowledgments

The City of Lacey would like to acknowledge the many public and private agencies that have developed information on the shorelines of Lacey that was used in this update.

This update was prepared with Grant Funding from the Washington State Department of Ecology SMA Grant Agreement No. G0800096

Many thanks to the Thurston Regional Planning staff that worked to secure and administer the grant from the Department of Ecology and who also crafted the framework and prepared a generic document that has served as the starting point for Lacey's update. Thurston Regional planning staff that worked on the first draft includes:

Steve Morrison, Senior Planner and Project Manager
Veena Tabbutt, Senior Planner Andrew
Deffobis Assistant Planner Sarah
Morley Administrative Assistant Toni
Tringolo Office Specialist II

Many thanks to the advanced Planners from the Cities of Olympia, Tumwater and Thurston County who participated in many work-sessions to provide technical input and direction on development of the first draft prepared by regional Planning:

Tim Smith, Senior Planner for Tumwater Jan
Weydemeyer, Senior Planner for Olympia Cindy
Wilson, Senior Planner for Thurston County Molly
Levitt, Associate Planner Thurston County
Table of Contents

I. INTRODUCTION .................................................................................................................. 1
   A. Background ......................................................................................................................... 1
   B. Timeline ............................................................................................................................. 3
   C. Purpose and Scope of Plan ............................................................................................... 3
   D. No Net Loss of Shoreline Ecological Functions ............................................................... 4
   E. Methods and Sources of Information .............................................................................. 7

II. SHORELINES ....................................................................................................................... 8

III. OVERVIEW OF RESTORATION PRIORITIES ................................................................. 9
   A. Assessment of Nearshore Marine Shorelines ................................................................. 9
   B. Freshwater Ecosystem Wide Processes and Restoration Potential ............................ 11
   C. Table Summary of Issues and Restoration Opportunities at the Reach System Scale .... 13
      Nearshore / Marine Environment ............................................................................... 13
      Key Management Issues .............................................................................................. 16
      Restoration Opportunities .............................................................................................. 16
      Woodland Creek System ............................................................................................... 17
      Key Management Issues .............................................................................................. 18
      Restoration Opportunities for Woodland Creek ........................................................... 19
      Freshwater Lake Systems ............................................................................................. 19
      Key Management Issues .............................................................................................. 19
      Restoration Opportunities for Freshwater Lakes ......................................................... 20

IV. IMPLEMENTATION STRATEGIES .................................................................................... 25

V. OTHER RESTORATION OPPORTUNITIES ......................................................................... 28

VI. METRICS AND ONGOING MONITORING ..................................................................... 29

VII. TIMELINES AND BENCHMARKS IN THE CONTEXT OF RESTORATION OBJECTIVES ... 30

VIII. RESTORATION GOALS AND POLICIES ................................................................... 32

IX. SUMMARY ........................................................................................................................ 36

X. RESOURCES USED IN DEVELOPING THIS PLAN ......................................................... 37

XI. EXISTING RESTORATION PARTNERS AND PROGRAMS ............................................ 21
List of Tables

<table>
<thead>
<tr>
<th>TABLE</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>TABLE 1</td>
<td>TIMELINE FOR THE SHORELINE MASTER PROGRAM UPDATE FOR THE CITY OF LACEY</td>
<td>3</td>
</tr>
<tr>
<td>TABLE 2</td>
<td>SMA SHORELINES AND FUNCTIONAL SYSTEMS FOR LACEY AND UGA</td>
<td>8</td>
</tr>
<tr>
<td>TABLE 3</td>
<td>RELATIVE CONDITION AND IMPORTANCE OF LACEY AND UGA MARINE NEARSHORE REACHES</td>
<td>10</td>
</tr>
<tr>
<td>TABLE 4</td>
<td>ASSESSMENT OF NEARSHORE/MARINE FUNCTIONS WITHIN LACEY AND LACEY'S UGA</td>
<td>14</td>
</tr>
<tr>
<td>TABLE 5</td>
<td>ASSESSMENT OF THE WOODLAND CREEK SYSTEM SHORELINE FUNCTIONS IN LACEY AND UGA</td>
<td>17</td>
</tr>
<tr>
<td>TABLE 6</td>
<td>GROUPS ACTIVE IN SHORELINE RESTORATION IN NORTHERN THURSTON COUNTY</td>
<td>21</td>
</tr>
<tr>
<td>TABLE 7</td>
<td>EXISTING RESTORATION PROJECTS IN LACEY AND UGA</td>
<td>26</td>
</tr>
<tr>
<td>TABLE 8</td>
<td>POTENTIAL METRICS AND MONITORING</td>
<td>29</td>
</tr>
</tbody>
</table>

List of Figures

<table>
<thead>
<tr>
<th>FIGURE 1</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>FIGURE 1</td>
<td>MITIGATION VERSUS RESTORATION IN SHORELINE MASTER PROGRAMS</td>
<td>6</td>
</tr>
<tr>
<td>FIGURE 2</td>
<td>CONCEPTUAL VIEW OF THE LANDSCAPE ANALYSIS FRAMEWORK</td>
<td>12</td>
</tr>
</tbody>
</table>
I. Introduction

A. Background

About this report: This report is the proposed final restoration plan for the city of Lacey, and Lacey's urban growth area. The report has been created as part of Lacey's Shoreline Master Program. It has been prepared from a generic draft created by Thurston Regional Planning Council (Regional) with a grant provided by the Department of Ecology. This report, The generic draft generally identified issues and opportunities from a bigger picture review of drainage basin wide issues. As a generic document designed for use by the three jurisdictions of Lacey, Olympia and Tumwater, this level of focus was necessary. The generic draft Regional developed was intended to provide a starting point for local jurisdictions.

To address Lacey's specific circumstances and need for protection and restoration of its shorelines, the generic draft has been significantly modified during a review and refinement process by the Lacey Planning Commission and Lacey City Council. This final report reflects those modifications.

Detail related to Lacey was generated as part of Lacey's SMP update process: It is important to note that the original generic draft necessarily made many broad conclusions when reviewing bigger picture restoration needs across the full spectrum of shoreline areas in Olympia, Tumwater and Lacey together with all of the associated UGAs. However, when considering restoration opportunities at the local level, Lacey only has jurisdiction over area within its incorporated boundaries. From this standpoint, it is important to specifically address those areas and situations Lacey can regulate and equally important to note differences in regulatory requirements Lacey has implemented that have had positive results in towards restoration and protection.

During Lacey’s evaluation, the original restoration analysis was taken a step further and review focused on Lacey’s specific jurisdiction, specific sites with known issues and a range of strategies that could achieve desired outcomes. The Planning Commission’s work-sessions over a nine month period were the heart of Lacey’s SMP update process and acted as the forum for the deliberation, discussion and development of this material.

This plan represents a transparent public process involving neighborhood groups, professional organizations, shoreline landowners, developers, interested members of the community and state resource agencies. These organizations and individuals were tapped for specific insight, expertise, and ideas on topic issues. The observations, conclusions and proposed strategies from this process have been integrated into this report.

Lacey’s history of strong environmental legislation: In the original reports utilized by the generic draft Restoration Plan, a number of statements were made regarding filling of wetlands and removal of riparian vegetation that has impacted the health of local shorelines. However, a close look at Lacey's situation paints an entirely different picture. While this may be true in areas outside Lacey, in Lacey there have been stricter regulations protecting wetlands and urban forest resources (trees) for over three decades.

In Lacey, progressive environmental regulations protected these valuable resources many years before it was fashionable in other jurisdictions, or required by state law. In fact, Lacey has lost
very little of its original large wetland areas around its lake systems. The majority of riparian habitat along that portion of Woodland Creek within Lacey has been well established and protected for decades. Riparian vegetation around Lacey’s lakes has been impacted to some degree as a result of moderate density urban development.
Tree protection in Lacey predated 1980 and Lacey continued to improve the concept receiving an award from the Washington State Chapter of the American Planning Association (APA) for update of its tree protection ordinance in 1992.

With an environmental focus and development of its 1992 environmental legislation and 1994 GMA Plans, the portion of Woodland Creek within that was under Lacey’s jurisdiction was protected with a 200 foot buffer. In addition, that portion of Marine Shoreline in the City was designated as open space in the Hawks Prairie Master Planned Community and has been left in its natural state. Continuing this focus today, most of these areas have been designated as Natural in the updated SMP for permanent protection.

Overall, in the face of significant growth, required under GMA, Lacey has maintained a diligent effort at preservation and protection of Lacey's environmentally sensitive areas and the quality of life enjoyed by its citizens.

Conclusions of the original reports have been reviewed and reworked based upon these facts and restoration priorities have been reworked and tailored to Lacey's specific restoration needs.

Use of this Plan: This plan is meant to provide a planning-level framework for understanding these issues and considering priorities for restoration and enhancement of shoreline ecological functions in the city of Lacey and Lacey's UGA. Restoration is defined under the shoreline guidelines as: “reestablishment or upgrading of impaired ecological shoreline processes or functions.”

It is important to note that for the purposes of shoreline management, the term restoration does not imply returning shoreline areas to aboriginal or pre-European settlement conditions. Instead, the concept is to work with areas that have been impacted by urbanization and to restore the natural functions and values of our shoreline resources as much as practical given what was existing at the time of the inventory and characterization. Little by little, opportunity by opportunity, we can halt and begin to reverse the damage done to promote a cleaner, healthier environment and quality of life. This is our vision, this is our challenge, and this restoration plan is intended to guide this effort.
B. Timeline

A timeline for the complete Shoreline Master Program update (a multi-year program) is below:

<table>
<thead>
<tr>
<th>Phase</th>
<th>Update Schedule</th>
<th>Timeline</th>
</tr>
</thead>
</table>
| 1     | • Determine what shorelines are regulated under the act  
       • Conduct an inventory of all existing and available data for shorelines  
       • Public Open Houses | Winter 2008. Accomplished under Regional contract with DOE |
| 2     | • Analyze and characterize shoreline conditions | Spring 2008. Accomplished under Regional contract with DOE |
| 3     | • Categorize each shoreline segment into a designation such as urban, suburban, or rural. Each will have a different set of rules.  
       • Develop draft rules and policies  
       • Public meetings | Fall 2008  
                      Winter-Spring 2009.  
                      Accomplished under Regional contract with DOE |
| 4     | • Analyze the cumulative impacts of expected shoreline development or redevelopment  
       • Develop a restoration (and preservation) plan, including public access | Winter-Spring 2009. Accomplished under Regional contract with DOE and refined by Lacey late 2009 and early 2010 |
| 5     | • Public hearings  
       • Planning Commission recommendation  
       • City Council approval  
       • State approval | Early 2010 |

C. Purpose and Scope of Plan

This document has been prepared to comply with the state’s SMP guidelines for restoration planning (WAC 173-26-201(2)(f)). The guidelines recommend require that restoration plans:

- Identify degraded areas, impaired ecological functions, and sites with potential for ecological restoration
- Establish overall goals and priorities for restoration of degraded areas and impaired ecological functions
• Identify existing and ongoing projects and programs that are currently being implemented, or are reasonably assured of being implemented (based on an evaluation of funding likely in the foreseeable future), which are designed to contribute to local restoration goals

• Identify additional projects and programs needed to achieve local restoration goals, and implementation strategies, including identifying prospective funding sources for those projects and programs

• Identify timelines and benchmarks for implementing restoration projects and programs and achieving local restoration goals

• Provide mechanisms or strategies to ensure that restoration projects and programs will be implemented according to plans and to appropriately review the effectiveness of the projects and programs in meeting the overall restoration goals

D. No Net Loss of Shoreline Ecological Functions

The concept of no net loss of shoreline ecological functions is rooted in the Act and in the goals, policies, and governing principles of the state’s shoreline guidelines. The Act states: “permitted uses in the shoreline shall be designed and conducted in a manner that minimizes insofar as practical, any resultant damage to the ecology and environment of the shoreline area.” According to the governing principles of the guidelines (WAC 173-26-186), protection of shoreline ecological functions are accomplished through the following:

• Meaningful understanding of current and potential shoreline ecological conditions

• Regulations and mitigation standards that ensure that permitted developments do not cause net loss of ecological functions

• Regulations that ensure exempt developments in the aggregate do not result in net loss of ecological functions

• Goals and policies for restoring ecologically impaired shorelines

• Regulations and programs that fairly allocate the burden of mitigating adverse cumulative impacts among development opportunities

• Incentives and voluntary measures designed to restore and protect ecological functions

It is not enough to simply prevent further loss of ecological functions, master programs provisions must also “…achieve overall improvements in shoreline ecological functions over time when compared to the status upon adoption of the master program.” The mandate to improve functions over time provides the basis for restoration planning and creates a distinction between mitigation and restoration in the context of the SMP.

Under the Act, applicants for shoreline permits must fully mitigate new impacts caused by their proposed development. Generally, applicants are not required to restore past ecosystem damages as a condition of permit approval. However, development standards can incrementally achieve restoration objectives simply by requiring a better design that is more in tune with the community’s needs for resource management. An example is zoning and landscaping standards adopted to implement a community vision for attractive and healthy shorelines. Standards can
require landscaping with native species that will present a natural, visually attractive appearance and promote restoration of the natural functions and values of Lacey’s shoreline resources.

Another important tool Lacey will utilize for protection and restoration of ecological function through the SMP is establishment of buffers, setbacks and vegetation management areas along shoreline areas as recommended by The Department of Fish and Wildlife, to promote water quality and habitat objectives. These protections, when buffers and setbacks are established, in concert with landscaping standards can be a highly effective strategy for restoration. Buffers and setbacks will stabilize the use of the shoreline area and landscaping standards can be used to fill in areas of the buffer setback that currently lack natural vegetative cover. Over the long term, incremental improvements will contribute to establish a buffer of native vegetation that provides superior water quality benefits and habitat. This promotes restoration objectives for Lacey shoreline resources.

In addition to development regulations designed to promote restoration, Lacey has also provided incentive and other opportunities for protection and restoration. Two examples are options for easier permitting exemption of permits that meet restoration criteria processes when replacing modifications like bulkheads under many situations, and incentives to dedication of shoreline property to the public.

Faced with significant repairs to a bulkhead and a significant permit review process to construct a new bulkhead or replace a bulkhead, the alternative of a simple permit exemption for installation of softer shoreline stabilization measures may be very attractive to a landowner. Exemption of permits for replacement that meet restoration standards should encourage landowners to replace bulkheads with more ecologically friendly, soft bioengineered approaches for beach stabilization. This may not meet the definition of development or substantial development so may be exempt from having to obtain a Shoreline Substantial Development permit. This promotes restoration objectives.

Incentives for transfer of significant density bonuses to upland sites or other ownerships across the City will encourage dedication of shoreline property to the public. Once in public ownership, plans for protection, restoration and/or use of shoreline area can be implemented.

This will work particularly well where shorelines are sensitive and already have development limitations. Getting significant density credit for property that cannot be utilized for intensive development provides value to the landowner/developer. This could lead to the City being able to acquire shoreline properties for no cost to the public. The City simply allows development on appropriate sites in the City where the density can be accommodated. This actually helps the City meet the intent of GMA as well as gaining control over important shoreline resources.

The figure below (Figure 1) shows the distinction between mitigation and restoration as it is applied through the Shoreline Master Program process.
FIGURE 1: MITIGATION VERSUS RESTORATION IN SHORELINE MASTER PROGRAMS. (SOURCE: DEPARTMENT OF ECOLOGY)
E. Methods and Sources of Information

This restoration plan is built upon the identification of degraded areas, impaired ecological functions, and sites with potential for ecological restoration identified in the Shoreline Inventory and Analysis and Characterization Report by ESA Adolfson (Phase 1).

Overall goals and priorities were drawn from existing plans, including Lacey's Comprehensive Planning processes.

Existing and on-going projects were obtained from the groups and jurisdictions active in shoreline preservation and restoration in the region.

Additional projects and programs were identified at the planning level from existing plans.

All of the sources were considered by the Lacey Planning Commission as part of the SMP update. In addition, Lacey’s analysis involved a “hands on” approach, with Planning Commission agendas dedicated to specific issues and discussion with organizations and individuals with a direct interest in specific topic areas. Examples of topic areas and interested parties relative to restoration activities included the following:

- State resources agencies were invited and participated in discussion of habitat, buffers and restoration needs,

- Lake front homeowners were invited and participated in discussion of specific issues related to permit requirements and how restoration with vegetation plans and permit requirements is expected to work.

- Beginning in June 2010, the Beachcrest Community Association was invited and participated in discussing the value and concerns for its marina and restoration needs and opportunities.
II. Shorelines

Table 2 lists the shorelines identified in the Shoreline Inventory for Lacey, and Lacey's Urban Growth Area, classified into functional systems.

**TABLE 2 - LACEY: SMA SHORELINES AND FUNCTIONAL SYSTEMS FOR LACEY AND UGA.**

<table>
<thead>
<tr>
<th>Type</th>
<th>Area</th>
<th>System</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marine Waters</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nisqually Reach</td>
<td>Lacey &amp; UGA</td>
<td>Nearshore/Marine</td>
</tr>
<tr>
<td>Rivers/Streams</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Woodland Creek</td>
<td>Lacey &amp; UGA</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Lakes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chambers Lake</td>
<td>Lacey &amp; Olympia</td>
<td>Freshwater Lake</td>
</tr>
<tr>
<td>Hicks Lake</td>
<td>Lacey</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Long Lake</td>
<td>Lacey &amp; UGA</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Pattison Lake</td>
<td>Lacey &amp; UGA</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Southwick Lake</td>
<td>Lacey &amp; UGA</td>
<td>Freshwater Lake</td>
</tr>
</tbody>
</table>
III. Overview of Restoration Priorities

This section provides an overview of areas that are considered priorities for restoration based on the Lacey, Olympia, and Tumwater Shoreline Analysis and Characterization Report. This section will be broken into two components:

- Summary of the Ecosystem Wide Processes and Restoration Potential
- Summary of Reach/System Scale Issues and Restoration Opportunities

A number of shoreline restoration projects are currently underway or are in the planning stages in Lacey. These projects have been initiated by various private, regional, state and federal entities resulting in several successful shoreline restoration and enhancement projects. They will be summarized in the following chapter.

A. Assessment of Nearshore Marine Shorelines

Initial Review: The initial qualitative assessment of the overall condition of the nearshore marine environment within the study area was developed in the Lacey, Olympia, and Tumwater Shoreline Analysis and Characterization Report. This assessment looked at a bigger picture of the drainage basin generally. Lacey has about 1.8 miles of marine shoreline in its jurisdiction.

The Lacey, Olympia, and Tumwater Shoreline Analysis and Characterization Report assessed the relative condition of each of the marine nearshore reaches based on a number of characteristics and parameters such as freshwater inputs, structural hydro-modifications, known water quality degradation, presence of important habitat types, etc. The results were translated into numerical scores then divided into three groups (high, medium and low). This provided a simplified assessment of the overall condition of each reach.

TABLE 3: RELATIVE CONDITION OF LACEY AND UGA MARINE NEARSHORE REACHES.

<table>
<thead>
<tr>
<th>Reach</th>
<th>Condition</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nisqually 1</td>
<td>High</td>
<td>Low level of alteration, several key habitats.</td>
</tr>
<tr>
<td>Nisqually 2</td>
<td>Medium</td>
<td>Medium to high level of alteration with development of marina and roads serving marina and community beach. Several key sediment and habitats.</td>
</tr>
</tbody>
</table>

These results should only be used for general discussion; no sensitivity analysis or other quality control has been performed on this approach. However, these results have generally good agreement with the preservation and restoration recommendations included in the Marine Shoreline Sediment Survey and Assessment (Herrera 2005). Reaches that have been designated high priority for forage fish spawning protection in the 2005 report are listed as ‘high’ in this assessment.

Comment [CB2]: A number of changes are suggested here. First, this table was moved here under initial review since it came out of TRPC’s initial work. Second, the paragraph above was added to provide some context for this table, which was cut and paste from the Analysis and Characterization report. In addition, the ‘conditions’ have been changed back to be reflective of what they were in that report. Stating the Nisqually 2 reach is in the best condition (“high”) cannot logically equate to areas with medium to high levels of alteration. The ‘importance’ label was also removed because this column doesn’t reflect importance. The original ESA report gives the cautionary statement that importance and alteration were combined in this method of analysis, which is reflected in the notes column.
Based upon Planning Commission discussion and review, the analysis and conclusions represent the best available knowledge and ideas for achieving restoration objectives over the long term.

Lacey’s Review during the Update: Lacey’s update focused specifically on properties in Lacey and Lacey’s Urban Growth Area. Lacey’s analysis included individual properties with known modification and impact to the natural function of its marine shoreline. This review only identified two concerns:

- **Atlas Powder Dock**: This is a large abandoned historic dock/pier located on Jubilee Beach at the end of a beach access from the Hawks Prairie Planned Community. The pier/dock dates back to World War II and was used for the transport of dynamite from the Dupont facility. This old dock/pier would have had creosote treated piles. This was typical of construction at the time, but would not be permitted today because it presents a serious water quality issue.

  The pier is also in disrepair and is unusable without extensive repair. Thought has been given to the possibility of cleanup and reconstruction of the dock to serve in the capacity as a community fishing pier with an access opportunity for the general public. This would have benefits of cleaning up the site and the establishment of an amenity for the entire community. However, it would be expensive and would also have new impacts that would need to be mitigated to meet the requirements of no net loss.

  In addition, there is no true “public” access to this area. The access trail from the Hawks Prairie Planned Community and is owned and maintained by the Jubilee HOA. A project to reconstruct the existing historic pier would need to consider acquiring both the access trail and pier for public use. Because of the access situation and expense reconstruction of the pier represents, there are no firm plans for this at this time. However, provision in the permitted use tables in the SMP has been made in the SMP contain provisions to that leave this idea open for consideration, provided any such project meets requirements of no net loss and environmental impacts at the site are fully mitigated.

Comment [CB3]: Suggested change for consistency with Appendix 1.
- **The Beachcrest Marina**: Most of the marine shoreline environment under Lacey’s jurisdiction is protected as open space in the Hawks Prairie Planned Community. However, a private marina (which occupies approximately 350 feet of shoreline), its associated access road and the adjacent Beachcrest community (which are not within the City of Lacey), have had impact to the surrounding shoreline environment dating well into the last century.

The whole shoreline associated with Beachcrest was part of an engineered event that took place in the 1940s as part of the Beachcrest development. It is a use that is expected to continue over the long term.

The marina and its access road have changed the original shoreline processes in this area. What was once a feeder bluff now has a fronting road that is heavily armored. In addition, the function of a pocket estuary was impacted in the 1940s by changing tidal flow in to the estuary for development of a permanent pond and fountain.

Restoration requirements are generally not applied to situations that predate inventory and analysis. While restoration of this area to improve habitat and natural estuary functions would be good for the ecology of the area and the larger community, it is not regulated as a requirement of permitting under this SMP. However, because of the value of pocket estuaries, restoration opportunities should be discussed, considered a priority and pursued where available.

**Discussion with the Beachcrest Community Association and Use of Incentives to Encourage Restoration**: Discussion with the Beachcrest Community Association representatives in June 2010 indicates the current Beachcrest community has an interest in restoration and doing what is healthy for the ecological functions of this area. A recent salmon restoration project is an example of its cooperation in achieving restoration of valuable ecological function. The marina will require continued maintenance and repair. Restoration is something that could be encouraged as maintenance activity occurs. Incentives to promote restoration should be considered that could help gain broad community support to move in this direction.

Beachcrest and the road are located in unincorporated Thurston County. Because of jurisdiction, options are limited for Lacey’s lead on restoration of this area. This is a topic for joint planning discussions. At a minimum, consideration should be given to an interlocal agreement that would place permit and exemption requirements with one jurisdiction. The split jurisdiction in the cove would make permitting very complex for the Beachcrest community.

**Table 3: Relative Condition and Importance of Lacey and UGA Marine Nearshore Reaches**

<table>
<thead>
<tr>
<th>Reach</th>
<th>Condition</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disaunty 1</td>
<td>High importance</td>
<td>Low level of alteration, several key habitats.</td>
</tr>
<tr>
<td>Nisqually-2</td>
<td>High importance</td>
<td>Medium to high level of alteration with development of marina and roads serving marina and community beach. Several key sediment and habitats.</td>
</tr>
</tbody>
</table>

These results should only be used for general discussion; no sensitivity analysis or other quality control has been performed on this approach.
However, these results have generally good agreement with the preservation and restoration recommendations included in the Marine Shoreline Sediment Survey and Assessment (Herrera 2005). Reaches that have been designated high priority for forage fish spawning protection in the 2005 report are listed as ‘high’ in this assessment.

Based upon Planning Commission discussion and review, the analysis and conclusions represent the best available knowledge and ideas for achieving restoration objectives over the long term.

B. Freshwater Ecosystem-Wide Processes and Restoration Potential

**Initial Review:** Ecosystem-wide processes that create, maintain, or affect the three City’s shoreline resources were characterized using an adapted version of the five-step approach to understanding and analyzing watershed processes described in Protecting Aquatic Ecosystems: A Guide for Puget Sound Planners to Understand Watershed Processes (Stanley et al, 2005), and presented in Chapter 3 of the original Lacey, Olympia, and Tumwater Shoreline Analysis and Characterization Report. Lacey has jurisdiction for 19.58 miles of freshwater shoreline (source: Adelison report).

The analysis specifically looked at hydrologic processes, where the important areas are, and how they have been altered over time. The two results are then taken together to suggest areas where protection or restoration of ecosystem process would be the most effective. While the analysis was specifically focused on hydrologic processes, the parameters used are fairly general landscape-level measures that can be used as a general proxy for overall level of functioning.

Important areas and level of alteration for freshwater systems were initially assessed using a three-step framework developed by Ecology to create a relative ranking of where protection or restoration would be most appropriate at the watershed scale. The framework develops a High, Medium 1, Medium 2, or Low score for both importance and alteration for each sub-basin within a study area. The scores for both importance and alteration are then taken together to develop an overall ranking of appropriate actions. Important areas include: 1) rain on snow areas; 2) surface storage (historic depressional wetlands) and floodplains; 3) recharge areas; 4) storage capacity areas; and 5) discharge areas.

The types of alterations that the framework considered are: 1) forest clearing; 2) filling of depressional wetlands; 3) channelization of streams; 4) road presence and density; and 5) impervious surface. The analysis helps identify a set of actions that would be most appropriate for each sub-basin within the watershed.

Considering this bigger picture, Figure 2 shows how the combined alteration and importance rankings are used to prioritize where development, protection and restoration could occur in the watershed to target a net gain in ecosystem functioning. Areas providing a high level of important watershed processes and having a high level of degradation or alteration would be most suitable for “Restoration.” Areas providing a low level of watershed processes and are highly altered would be most suitable for “Development.” Finally, those areas with high level of providing important watershed processes and with low alteration are designated most suitable for “Protection.” In the middle of the matrix, areas are denoted Protection/Restoration, as either method may be more appropriate. Please note, however, that this analysis should not be interpreted to indicate the only action that is appropriate in any given basin. The resolution of this analysis is limited by the resolution of the supporting datasets, and can only identify high-level trends in the landscape.
The integrated results shown on Map 1 identify the highest restoration potential along the Deschutes River and within the urban core of the Regional study area. Clearly, wholesale restoration of the area is difficult or impossible to achieve, given current infrastructure. However, the restoration of key aquatic areas within the urban area can provide important corridors and connections between the upper watershed and the marine nearshore. The remainder of the area is located within the Preservation/Restoration area. Preservation-only areas are identified outside of the growth area – and are limited to a sub-basin in the upper Deschutes basin, and three small sub-basins along the marine nearshore.

Please note that there are no “Development” subbasins, since there are no “Low” importance areas identified in the Thurston study area. The Protection/Restoration category was applied more broadly.

**Summary of Freshwater Restoration Needs Identified during Lacey’s Review during the Update:**

Restoration needs identified are primarily directed at residential properties along developed lakeshores that Lacey has jurisdiction over and retrofitting of outdated drainage infrastructure both in Lacey and its UGA where opportunities arise.

Emphasis along lakefronts is re-establishment of vegetation buffers to promote water quality and habitat functions. This can be done through a combination of general landscaping-vegetation management requirements and mitigation and restoration opportunities during the review and processing of new permits. Part Two of the SMP is dedicated to discussion of the purpose and strategies to accomplish these objectives. Part Two: Environmental Concepts, Shoreline Values and Functions, Vegetation and Restoration.

A significant focus is also being placed on elimination of existing septic tank drainfields in areas...
of Lacey’s UGA in close proximity to Woodland Creek and lakes, which are currently impacting water quality and local shellfish resources. Specific standards in the SMP are adopted in this regard under the water quality section.
C. **Summary of Issues and Restoration Opportunities at the Reach System Scale**

Beyond the initial review focused on the bigger picture of watershed and sub-basin priorities, later analysis has included more localized site specific micro issues. This occurred by looking at specific sites with identified issues and considering policy development to address concerns as part of the SMP.

Additional discussion and edits have been made to this Plan and associated tables after the original generic draft. This was done to more specifically address and represent Lacey’s area of jurisdiction and influence and to consider issues and restoration opportunities identified while updating the SMP.

The following tables, summary of key management issues and restoration opportunities were developed as part of Chapter 5 of the *Lacey, Olympia, and Tumwater Shoreline Analysis and Characterization Report*, prepared as part of the Shoreline Master Program update. The tables provide a summary of shoreline functions, levels of alteration, and restoration opportunities for shoreline reach systems within the study area. Several of these areas are within Lacey and the Lacey UGA:

- Nearshore/Marine Environment – Nisqually Reach
- Woodland Creek System - Woodland Creek, Long Lake, Pattison Lake, and Hicks Lake

**Nearshore/Marine Environment**

Table 4 of the original *Analysis and Characterization* report summarizes the status of the Nearshore / Marine Planning Area and describes the shoreline functions, the level of alteration compared to historical conditions, and the restoration opportunities to improve shoreline functions. However, it should be noted that by considering both the marine areas in Olympia and Lacey together in the same table, the specific characteristics of Lacey have not been emphasized to its benefit. With this update, changes to the tables have been made in this final report to reflect analysis specific to Lacey and its UGA.
### TABLE 4: ASSESSMENT OF NEARSHORE/MARINE FUNCTIONS WITHIN LACEY AND LACEY’S UGA

<table>
<thead>
<tr>
<th>Process: Function</th>
<th>Level of Alteration</th>
<th>Potential Protection and Restoration Measures and Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Habitat</strong>: Estuarine habitat; subtidal and intertidal mudflats and salt marshes provide transition habitat between fresh and salt water environments.</td>
<td>Moderate to Low Lacey’s Marine shoreline is <strong>significantly–relatively</strong> intact with associated pocket estuaries. <strong>However,</strong> a portion of the small Beachcrest Marina is in Lacey and <strong>this</strong> has had an impact on natural functions of the area, including impact to pocket estuaries. Recent restoration activities at the Beachcrest open space in Lacey’s UGA seek to reestablish some of these functions that were impacted when the pocket estuary there was closed off to create a pond and the shoreline was armored with rip rap.</td>
<td>Moderate to Low Lacey’s marine shoreline is <strong>significantly</strong> relatively intact. Butterball cove is currently designated as open space in a Master Planned Community and has been designated Natural in the SMP. The pocket estuary behind the Beachcrest marina has also been designated Natural, with the exception of the physical space occupied by the marina. All of the area, with the exception of the location of the marina, will be designated as Natural to continue existing protection strategies. This area of that area has been designated Urban will remain Conservancy. However, that area wrapping around the marina that is the associated estuary meets requirements of a Natural designation and will receive that designation. There may be opportunity to improve/restore the area around Mallard Cove where that has the marina is located, particularly to enhance the function of pocket estuaries. Currently, there is a salmon restoration project ongoing at a pocket-estuary on site that is within the jurisdiction of Thurston County. It should be noted that most of the area impacted is within Thurston County and Lacey does not have jurisdiction over the Beachcrest subdivision and its housing or the area where the road along the shoreline is located.</td>
</tr>
</tbody>
</table>

---

**Comment [CBS]:** Even though the title of this table states its contents consider conditions in the UGA, most of the text inside it did not especially when discussion of level of alteration. Changes are suggested throughout the table, and to take discussions regarding protection and restoration opportunities out of the level of alteration column and put them in the appropriate column.
### Potential Protection and Restoration Measures and Opportunities

<table>
<thead>
<tr>
<th>Process: Function</th>
<th>Level of Alteration</th>
<th>Hydrology: Attenuation of wave energy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sediment Generation and Transport: Sediment delivery from coastal bluffs and streams.</td>
<td>Low to Moderate</td>
<td>Moderate to Low (Considering adjacent area in unincorporated county UGA)</td>
</tr>
<tr>
<td>Moderate to Low</td>
<td>Moderate to Low</td>
<td>Lacey's marine shoreline is relatively intact. Butterball cove is currently designated as open space in a Master Planned Community, and has been designated Natural in the SMP. The pocket estuary behind the Beachcrest marina has also been designated Natural, with the exception of the physical space occupied by the marina. That area has been designated Urban Conservancy. This marine shoreline will be designated as Natural consistent with its current designation as Open space in the associated Planned Community, where it is located. Armoring of this area within the City limits has been prohibited and will continue to be prohibited to support existing estuarine wetland functions and valued hydrologic processes and functions. The strategy is to simply let natural processes take place in this area. Non exempt maintenance activities at the marina, in that portion under Lacey’s jurisdiction, will be reviewed for restoration opportunities. No expansion will be permitted.</td>
</tr>
<tr>
<td>Moderate to Low</td>
<td>Moderate to Low</td>
<td>Maintenance of existing connections between bluffs and the nearshore is a high priority. Maintenance of the existing connections between stream mouths and the nearshore, for sediment delivery and other habitat benefits, is also a high priority. Designation of the marine shoreline as Natural and Urban Conservancy and continued protection of this system is appropriate.</td>
</tr>
</tbody>
</table>

Exhibit C-10: Continuation of Recommended Change "App 3"
<table>
<thead>
<tr>
<th>Process: Function</th>
<th>Level of Alteration</th>
<th>Potential Protection and Restoration Measures and Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Water Quality:</strong> Wetland removal of pollutants through sedimentation and adsorption.</td>
<td>Low to Moderate in City. Protection of Reduction of wetland areas along Lacey’s marine shorelines has not occurred. However, alterations to pocket estuaries in Lacey’s marine UGAs have likely affected the presence, extent and function of wetlands maintained this component of the Woodland Creek system.</td>
<td>Moderate to Low. Continued protection of the marine shoreline and Woodland Creek system in Lacey will ensure preservation of this function. Through the SMA assigned environment designations, little to no development is anticipated within Lacey’s marine shorelines. Expansion of the Beachcrest Marina in Lacey’s UGA is prohibited. Maintenance and repair activities occurring at the marina will be reviewed for restoration opportunities.</td>
</tr>
<tr>
<td><strong>Water Quality:</strong> Wetland removal of pollutants through sedimentation and adsorption.</td>
<td>Low in City. Protection of wetland areas in Lacey has maintained this component of the Woodland Creek system.</td>
<td>Moderate. Continued protection of the marine shoreline and Woodland Creek system in Lacey will ensure preservation of this function.</td>
</tr>
<tr>
<td><strong>Water Quality:</strong> Delivery, movement, and loss or removal of nutrients, pathogens, and toxicants; storage of phosphorus and removal of nitrogen and toxins through sedimentation and adsorption.</td>
<td>Low to Moderate. The Butterball Cove area and the marine shoreline within Lacey to the east of Butterball Cove are substantially unaltered. Uplands in this area were designated as reserved area for future development in the Hawks prairie master planned community or open space. This area did not face pressure for urbanization until recently. Wetland and tree protection regulations covering upland area has maintained critical functions and values. This function has been impacted in Lacey’s UGA where upland sources of the pollutants have increased and potential storage has decreased through wetland loss and the installation of impervious surfaces.</td>
<td>Low to along the majority of area in Lacey’s jurisdiction. Moderate for the marina and High in area to the east under jurisdiction of Thurston County. Lacey’s wetland protection regulations and tree protection regulations that predated GMA requirements have effectively preserved and protected associated upland wetlands. Wetlands primarily associated with the marine shoreline have not experienced pressure for urbanization until recently. However, with development upland sources of these pollutants and sediment have increased. These areas were reserved for future development in the early Master Planned Community and were never developed. After Lacey annexed the area and became responsible for regulation of development, wetland regulations have been applied in planning undeveloped portions of the Planned Community. Regulations essentially prohibit development in these critical areas and their designated buffers. Cleanup of the historical atlas powder dock might have some benefit, depending upon the impact the pier is currently having to water quality. The impact 60+ year old creosote pilings are having is unknown. This might be considered in association with reconstruction of the pier as a public access and community fishing pier.</td>
</tr>
</tbody>
</table>
### Habitat:

Shoreline habitat for wildlife; vegetation provides structure for invertebrates, birds, amphibians, reptiles, and mammals.

- **Low to Moderate**: Natural vegetation is well established and protected along and adjacent to almost all of Lacey's marine shoreline area in the city limits. However, a portion of the small private Beachcrest Marina and associated access road has had an impact on shoreline habitat in Lacey's UGA. However, most of the area with impact is outside Lacey's jurisdiction.

- **Low to Moderate**: Along shoreline in Lacey, with exception of a portion of the Beachcrest Marina.

No alterations/improvements exist along the existing Lacey's marine shoreline that will be designated "Natural", with the exception of an old abandoned pier. The active Beachcrest Marina in Lacey's UGA should be given high priority when considering high priority. High priority should be to support restoration efforts of the Beachcrest HOA for the pocket estuarine where the access road to the marina has modified the natural processes.

---

### Habitat:

Source and delivery of LWD.

- **Low to Moderate**: In Lacey there has been a tree protection ordinance in effect since the early 1980s. This ordinance has historically prohibited loss of trees within the riparian corridor and shoreline environments and loss of canopy in upland areas. Where the Beachcrest marina and open space exist in Lacey's UGA, both the source and delivery of LWD have been altered.

- **Low to Moderate**: In Lacey's marine system is well established and the natural processes have not been significantly impacted by urbanization of upland area because of sensitive area ordinance regulations. In the UGA at Beachcrest, protection of existing routes for delivery of LWD in the form of stream corridors and maintenance of the source in the form of mature trees on the bluffs will ensure there are no further losses.
<table>
<thead>
<tr>
<th>Process: Function</th>
<th>Level of Alteration</th>
<th>Potential Protection and Restoration Measures and Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>in upland areas. As such the majority of Woodland Creek in Lacey has a long standing 200 foot buffer of trees and the marine shoreline at Butterball Cove is completely established and protected in natural vegetation.</td>
<td></td>
</tr>
</tbody>
</table>

**Key Management Issues**

The key management issues within the South Puget Sound area of Nisqually Reach include the following:

- In Lacey, continued protection of the marine shoreline with a designation of Natural is appropriate. Continued restoration efforts of the shoreline and estuaries at Mallard Cove and just east of Lacey’s jurisdiction in unincorporated Thurston County UGA should be supported as high priority. Incentives in the form of permit exemptions for maintenance activities and improvements that accomplish restoration objectives should be pursued.

- Nutrient input to the nearshore from upland sources and freshwater tributaries is contributing to the eutrophication of marine waters in the South Puget Sound. The flushing action and circulation of the South Puget Sound is slower than other parts of the Sound, resulting in sensitivity to nutrient loading.

- In Lacey, continued protection of tree resources pursuant to its Urban Forest Management Plan and implementation through its tree and vegetation protection and preservation ordinance is appropriate.

- Focus should continue on non point source pollution of the Woodland Creek corridor from existing septic tank drainfields, *which empties into the Puget Sound*.

**Restoration Opportunities**

Restoration opportunities in the South Puget Sound have been identified in the Nearshore Sediment Survey conducted by Herrera (2005). High priority beaches for preservation and for restoration were identified.

- High priority preservation of Butterball Cove in the Nisqually Reach. Designation of the Butterball Cove area as Natural is part of the SMP update.

- Restoration of pocket estuaries just east of Lacey’s UGA should be a high priority.

- Allow natural sediment processes.
• Preservation of unarmored shorelines to minimize further impacts to the South Puget Sound beach habitat.
Woodland Creek System

This section summarizes the status of the shorelines in the Woodland Creek Shoreline system based upon the inventory information, and describes the shoreline functions, the level of alteration compared to historical conditions, and the opportunities to protect and restoration opportunities to improve shoreline conditions (Table 5). The Woodland Creek system includes Woodland Creek, Long Lake, Pattison Lake, and Hicks Lake as all important contributors to the creek system and its health. Generally this table covers all freshwater systems in Lacey, and has been made applicable to Southwick and Chambers lakes as well. Woodland Creek drains to Henderson Inlet, which lies within Thurston County Shoreline jurisdiction. These tables have been modified from the original study Analysis and Characterization Report to specifically address those shoreline areas in Lacey and its UGA.

<table>
<thead>
<tr>
<th>Process: Function</th>
<th>Level of Alteration</th>
<th>Potential Protection and Restoration Measures and Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrology: Channel and floodplain connection.</td>
<td>Moderate to Low. Infrastructure such as railroad crossings and roads over the last century has altered connections between impacted the historical Woodland Creek and its associated lake/wetland complexes. Levels in Chambers Lake are manipulated by the Ditch District channel. However as far as Woodland Creek itself, the channel is relatively naturally well defined and there is no significant meandering or floodplain-associated with this system. Associated wetlands associated with the Creek systems for flood absorption have been well protected and preserved.</td>
<td>Low. Moderate. Continued protection of these critical areas and their connections and floodplains under Lacey’s sensitive area ordinances SMP is appropriate. Restoration opportunities are low as significant infrastructure expenditures and investments would be necessary to restore connections where railroad dikes or roads have been constructed.</td>
</tr>
</tbody>
</table>
### Hydrology: Summer low flows.

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moderate to Low High</td>
<td>Generally, upstream land uses and development have resulted in less water flowing in urban streams. Woodland Creek is no exception during the summer low-flow periods. The woodland Creek system is also relatively flashy; stormwater runoff is not held in the system for long and the basin is relatively small. Preservation of wetlands and headwater lakes will maintain base flows to Woodland creek. Use of stormwater management practices that encourage low impact development and infiltration may minimize impervious surfaces in the basin. Opportunities are limited however by the relative size of the basin.</td>
</tr>
</tbody>
</table>

### Hydrology: Flood flow retention.

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>Large wetland complexes still provide flood storage, except in areas of high groundwater. Chambers Lake levels are managed by a ditch district. Continued preservation of floodplain areas and hydrologic connections between water bodies during development will assist in maintaining flow in the creek, retaining flood flows.</td>
</tr>
</tbody>
</table>

### Sediment Generation and Transport: Upland sediment generation.

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moderate</td>
<td>Fine sediment loading has increased due to build-up and wash-off from urban land uses. Implementation and retrofit of water quality BMPs to the existing stormwater system can reduce fine sediment loading. Requirements and incentives to restore areas of shoreline vegetation can help capture sediment and nutrients it has captured before it enters water bodies.</td>
</tr>
</tbody>
</table>

### Water Quality: Wetland removal of pollutants through sedimentation and adsorption.

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>Protection of the large wetland areas, complexes and trees under Lacey's sensitive critical area ordinances and tree protection requirements has maintained this function in Lacey. Continuation with of existing wetland protection strategies and protection of trees and surrounding designated buffer and vegetation management areas is appropriate. Setbacks will assist in distancing sources of pollutants and sediment from water bodies.</td>
</tr>
<tr>
<td>Process: Function</td>
<td>Level of Alteration</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td><strong>Water Quality:</strong> Delivery, movement, and loss or removal of nutrients, pathogens, and toxicants; storage of phosphorus and removal of nitrogen and toxins through sedimentation and adsorption.</td>
<td>High The delivery, transport, and disposition of nutrients, pathogens, and toxins have been significantly altered from the pre-disturbance condition. Upland sources of these pollutants have increased significantly as a result of urban land uses within the Woodland Creek drainage basin and Southwick and Chambers lakes. Potential storage has decreased through installation of impervious surfaces. The development of the TDML for Woodland Creek has highlighted potential sources of point-source pollution and flow reduction.</td>
</tr>
<tr>
<td><strong>Habitat:</strong> Shoreline habitat for wildlife; vegetation provides structure for invertebrates, birds, amphibians, reptiles, and mammals.</td>
<td>Low to Moderate Native riparian vegetation has been removed during past development along lake shorelines. However, significant sections of the creek and portions of the lakes where wetlands exist retain the natural riparian vegetation due to Lacey’s sensitive area regulations and long-standing tree protection ordinance.</td>
</tr>
<tr>
<td><strong>Habitat:</strong> Source and delivery of Large Woody Debris (LWD).</td>
<td>Moderate Sensitive area ordinances have protected wetlands and shorelines in Lacey and prevent modification of these areas including removal of LWD or other material or conditions valuable for habitat. However, historic development of lake shorelines for residential use has changed the vegetative profile of lakeside lots where residential development has occurred.</td>
</tr>
</tbody>
</table>
Key Management Issues
The key management issues for Woodland Creek drainage system are the following:

- Increases in sediment, nutrients, pathogens and other pollutants have accelerated eutrophication of the lakes and reduced water quality in Woodland Creek. This has resulted in downstream impacts to Henderson Inlet, including shellfish closures. Fecal coliform is the main pollutant resulting from septic systems, urban runoff and/or agricultural sources.
Increased sediments and nutrients in the lakes within this basin (Pattison, Southwick, Long, and Hicks) but also in Chambers and Southwick lakes have encouraged growth of invasive aquatic plants and algae. Phosphorus loading is a problem, although water quality is improving on some lakes.

Development has resulted in some decreased riparian habitat along Woodland Creek and the lakes within its basin. However, within Lacey Woodland Creek and significant wetland areas adjacent to the lakes have been protected and preserved with significant extensive buffers and tree protection regulations.

**Restoration Opportunities for Woodland Creek**

According to the limiting factors analysis for WRIA 13 (Haring and Konovsky, 1999) for Woodland Creek the following restoration opportunities exist:

- Take corrective action to improve water quality in the creek basin, specifically to control pollutants and sediment transport from urban runoff.
- Restore LWD to stream channels to improve in-stream habitat.
- Restore riparian habitat around lakes and woodland creek wherever feasible.
- Preserve and restore headwater wetlands so as to enhance habitat and protect water quality.
- Enhance fish passage by removing barriers.

In addition, Thurston County has initiated the Woodland Creek Pollutant Load Reduction project. Possible corrective actions noted to reduce pollution and restore Woodland Creek and the lakes within its basin included:

- Improving riparian vegetation;
- Improve septic systems and retrofit to improve water quality in basin;
- Encourage low impact development strategies to manage stormwater; and
- Review alternative stormwater conveyance systems.

It should be noted that the study includes portions of the creek that are in unincorporated Thurston County, where Lacey will have little if any regulatory influence.

**Fresh Water Lake Systems**

**Key Management Issues**

The key management issues for freshwater lakes in the study area include:

- Loss of riparian forest surrounding the lake shore.
- The installation of artificial bank strengthening.
• The sources and pathways for excess nutrients, pathogens and toxins are significantly altered from the pre-disturbance condition. Increased nutrient loading can significantly modify the trophic status of lakes.
Restoration Opportunities for Freshwater Lakes

There are several programmatic restoration opportunities that can be implemented to improve the overall ecological functioning of the freshwater lakes in the study area.

- **Protect, Restore and/or enhance riparian forests surrounding the lake shores.** Because sensitive areas are already protected this will necessarily include developed property where limited opportunity will exist. However, Lacey’s tree protection ordinance limits tree removal on every lot within the City, including water front lots. This has resulted in the retention of heavily wooded lake front lots; see picture on front cover of this SMP.

- **In addition, With this SMP, policies have been developed to incentivize and require landscaping of designated buffer-vegetation management areas along the shoreline that corresponds to the shoreline designation, its sensitivity and associated setback. Depending upon the specific regulatory trigger, this will generally be accomplished through done as general zoning landscaping requirements, tree protection regulations, mitigation related to development or restoration opportunities.

- Implement source control and/or stormwater treatment retrofitting throughout the contributing basin to improve water quality.

- Replacement of artificial bank strengthening (e.g., bulkheads) with soft or no-armor solutions. With new SMP standards, review of modifications will be required when maintenance exceeds 50% of the value of replacement. At that time maintenance is defined as a replacement and a CUP will be required. CUP review requires consideration of alternatives and choosing soft solutions over armoring where practical.
IV. Existing Restoration Partners and Programs

The cities of Lacey, Olympia, and Tumwater work with Thurston County on restoration activities throughout the study area through a variety of different programs and departments. In addition there are many other government and non-profit groups active in North Thurston County. Many are listed in the table below.

TABLE 6: Groups Active in Shoreline Restoration in Northern Thurston County.

<table>
<thead>
<tr>
<th>Group</th>
<th>Description</th>
<th>Restoration Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stream Team&lt;br&gt;Thurston County, Lacey, Olympia and Tumwater</td>
<td>Stream Team is a program for citizens interested in protecting and enhancing water resources in Thurston County watersheds. The program is jointly coordinated by Thurston County and the cities of Lacey, Olympia, and Tumwater.</td>
<td>Education&lt;br&gt;Volunteer stream vegetation plantings and water quality monitoring&lt;br&gt;Salmon steward training&lt;br&gt;Storm drain marking&lt;br&gt;Habitat Restoration</td>
</tr>
<tr>
<td>Stormwater Utilities&lt;br&gt;Thurston County, Lacey, Olympia and Tumwater</td>
<td>Stormwater utility departments in all four jurisdictions’ work to reduce stormwater pollution from urban runoff.</td>
<td>Stormwater utility departments design and build projects to reduce flooding, pollution and erosion caused by stormwater runoff. Projects may involve replacing failing drywells and catch basins (storm drains), building stormwater ponds, installing “infiltration galleries,” or installing separating devices that remove pollutants. Stormwater utilities also manage NPDES permits and are involved in education and outreach.</td>
</tr>
<tr>
<td>Parks Departments&lt;br&gt;Thurston County, Lacey, Olympia and Tumwater and State</td>
<td>Parks departments in all local jurisdictions, in addition to the State, own and manage waterfront property.</td>
<td>Restoring native vegetation and shorelines along park properties.&lt;br&gt;General environmental cleanup.</td>
</tr>
<tr>
<td>Capitol Lake Adaptive Management Plan (CLAMP) Steering Committee</td>
<td>The Department of General Administration manages the Capitol Lake as part of the Capitol Campus. The Capitol Lake Adaptive Management Plan (CLAMP) Steering Committee advises General Administration on long-range planning for the lake.</td>
<td>Capitol Lake is a 260-acre lake located on the State Capitol Campus in Olympia and Tumwater. It was created in 1951 when a dam was constructed at the mouth of the Deschutes River, blocking the tidal action of Puget Sound, to form a reflecting pool for the Legislative (Capitol) Building. Research into the feasibility of recreating an estuary at the mouth of the Deschutes River (removing the Capitol Lake dam) has been completed. An evaluation of several alternative scenarios has been prepared. A decision of how best to manage the lake basins is anticipated during the 2nd half of 2009.</td>
</tr>
<tr>
<td>Group</td>
<td>Description</td>
<td>Restoration Activities</td>
</tr>
<tr>
<td>-------</td>
<td>-------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>LOTT Alliance Lacey, Olympia, Tumwater and Thurston County</td>
<td>The LOTT Alliance is a partnership between Lacey, Olympia, Tumwater, and Thurston County to provide wastewater management and reclaimed water production services for the urbanized area of north Thurston County.</td>
<td>LOTT invests in capital projects, to help preserve and protect public health, the environment, and water resources. Invests in water conservation, water quality and habitat improvement projects in the Deschutes River watershed, including Budd Inlet, as compensation for being allowed to increase wintertime discharges from the treatment plant to Budd Inlet. An example of this is the Gull Harbor Estuary.</td>
</tr>
<tr>
<td>Squaxin Island Tribe</td>
<td>The Squaxin Island Tribe is a historic steward and a conscientious co-manager and protector of natural resources, working in cooperation with numerous federal, state and county government agencies and organizations.</td>
<td>The tribe participates in natural resources enhancement and protection programs with other groups and agencies to ensure that today's decisions provide for a healthy future.</td>
</tr>
</tbody>
</table>
| Nisqually Indian Tribe | The Nisqually Indian Tribe operates as a "Self-Governance" Tribe and utilizes resources from its Tribal economic enterprises as well as Federal program dollars. Their mission of their salmon recovery program is to protect, restore, and enhance the treaty-protected resources of the Nisqually Indian Tribe. | Salmon Recovery:  
• Plan for the recovery of all Nisqually salmon  
• Restore salmon habitat  
• Study Nisqually salmon, salmon habitat; monitor effectiveness of actions  
• Teach people about salmon habitat (Stream Stewards)  
• Involve people in protecting and restoring salmon habitat (Stream Stewards) |
| Thurston Conservation District | The Thurston Conservation District promotes voluntary stewardship among private landowners in Thurston County. Conservation Districts (CDs) are legal subdivisions of state government that administer programs to conserve natural resources. | Conducts, oversees and participates in various restoration projects throughout Thurston County. Works to restore ‘riparian habitats’ (any habitats near water) since these areas are crucial for the health of all wildlife, especially ‘salmonids’ (salmon and trout). Also involved with agricultural assessments, education and outreach. |
| Port of Olympia | The Port of Olympia is a major landowner of shoreline property in Budd Inlet. | Contaminant cleanup in Budd Inlet and upland properties:  
• Cascade Pole  
• Dioxin cleanup in Budd Inlet (shipping berths)  
• East Bay Redevelopment site |
Exhibit C-10: Continuation of Recommended Change “App 3”

<table>
<thead>
<tr>
<th>Group</th>
<th>Description</th>
<th>Restoration Activities</th>
</tr>
</thead>
</table>
| Budd Inlet Restoration Partnership | The Cities of Olympia and Tumwater, Port of Olympia, Thurston County, LOTT Alliance, and Washington State University Thurston County Extension are forming a partnership to develop an action plan for Budd Inlet restoration. | The first phase of the Action Plan includes:  
• an inventory/assessment of major current efforts related to Budd Inlet restoration  
• summary of partner interests, needs and goals relative to Budd Inlet; a community forum to solicit concerns and priorities  
• identification of potential opportunities to work together  
• a project description and organizational frameworks for the next phase. Planning for Phase II is underway. |
| Salmon Recovery Funding Board | Created in 1999 by the Washington State Legislature, the Salmon Recovery Funding Board (SRFB) provides grant funds to protect or restore salmon habitat and assist related activities. It works closely with local watershed groups known as lead entities. The board is composed of five citizens appointed by the Governor and five state agency directors. | The Salmon Recovery Funding Board supports salmon recovery by funding habitat protection and restoration projects. It also supports related programs and activities that produce sustainable and measurable benefits for fish and their habitat. SRFB has helped finance over 900 projects. |
| South Puget Sound Salmon Enhancement Group | The South Puget Sound Salmon Enhancement Group (SPSSEG) is a 501(c)(3) non-profit organization committed to protecting and restoring salmon populations and aquatic habitat with an emphasis on ecosystem function through scientifically informed projects, community education, and volunteer involvement. Part of their mission is to seek out and work in cooperation with other organizations to help plan, fund, carry out, and monitor fishery enhancement and habitat restoration projects. | Habitat Improvement:  
• Engineered Log Jams (ELJs)  
• Bulkhead Removal  
• Riparian Plantings  
Fish Passage:  
• Culvert Removal  
• Other Barrier Removals |
<p>| Puget Sound Partnership | The Puget Sound Partnership is a community effort of citizens, governments, tribes, scientists, and businesses working together to restore and protect Puget Sound. | Their Action Agenda will prioritize cleanup and improvement projects, coordinate federal, state, local, tribal, and private resources, and make sure that everyone is working cooperatively. |
| Capitol Land Trust | Non-profit Land Trust | The Capitol Land Trust conserves important wildlife habitat and natural areas by accepting donations of conservation easements and gifts of land, or by working with partners to purchase lands. Since 1989, Capitol Land Trust has been instrumental in permanently conserving 2,957 acres in Mason, Grays Harbor, and Thurston Counties. |</p>
<table>
<thead>
<tr>
<th>Group</th>
<th>Description</th>
<th>Restoration Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nisqually Land Trust</td>
<td>Non-profit Land Trust</td>
<td>Since 1989, the Nisqually Land Trust has acquired, for permanent protection, nearly 1,700 acres of superior wildlife habitat—from threatened old-growth forest near the Nisqually River’s source to critical salmon habitat near its delta.</td>
</tr>
</tbody>
</table>
| Barnes Lake Management District            | Citizen steering committee appointed by Tumwater City Council               | • Management of aquatic plants and noxious weed prevention & eradication  
• A limnological study of the lake, including water quality, wildlife, and habitat assessments  
• Environmental education  
• Recreation planning  
• Habitat management                                                                                                                                                                                                                                                                   |
| The development, community, and builders  | Professionals that do the actual development work on the ground             | An emphasis of this SMP is partnering with the development community in achieving restoration goals that are good for the community at large as well as property owners they will be working for. Landscaping standards have been crafted to be fair and to make sense for the landowner. Partnering with professional builders brings them into the loop so they can advise clients of proper permit requirements and vegetation options. |
V. Implementation Strategies

Restoration projects are implemented by all of the planning partners listed in the previous section. Each entity participates in a prioritization process that includes implementation strategies and identifying sources of funding. Projects are funded through a variety of sources including grants from state and federal sources.

In addition, this SMP is designed to build protection and restoration objectives into general zoning and development requirements for land use form and design. Several strategies have been built into the SMP and dovetailed with other existing regulations to achieve these objectives. Major techniques are summarized below:

- **Zoning, Land Use Form and Design:** For undeveloped parcels, the proper use of zoning design standards to promote the right form of land use development, and requiring environmentally sensitive design will promote protection and restoration opportunities as well as match land form to shoreline needs and prevent additional impacts as areas urbanize. Rather than promoting standard single family detached housing that has had significant impact to shoreline areas, innovative techniques like clustering of homes can promote restoration objectives. As an example, development in a clustered cottage configuration and common open space with tree tracts and natural vegetation could significantly protect and/or enhance natural functions and values.

- **Buffering of setback Vegetation Management Areas:** Vegetation management buffering requirements are implemented in association with the needs of individual environment designations to correspond with setback requirements. Within vegetation management areas buffering, standards are applied that protect and improve natural functions and value, such as avoidance of impacts and landscaping. This will promote restoration objectives.

- **Landscaping Standards:** Restoration objectives will also be realized incrementally on single family lots that are redeveloped or expanded when existing vegetation is not sufficient to protect resources from impacts. Restoration objectives are promoted through implementation of landscaping requirements, in association with buffer vegetation management requirements that set a vision for the community for shoreline aesthetics, water quality management, and provision of habitat.

- **Development Options:** Options for permit applicants may also promote restoration activities by providing alternatives for development that might not be permitted without restoration actions. An example would be expansion of a structure that does not meet new setbacks from the OHWM. While a structure not meeting setbacks might not normally be permitted to expand because of impacts to a public interest, restoration options can be used to offset these no net loss concerns. This provides extra value to the landowner by additional use of property and the public by promoting public restoration objectives.

- **Incentives:** Incentives for dedication of property will also promote restoration objectives by putting shoreline property in public ownership providing restoration opportunities through public management of the resource not otherwise available.
Table 7 lists recent restoration projects within SMA jurisdiction or affecting SMA shorelines.

**TABLE 7 - LACEY: EXISTING RESTORATION PROJECTS IN LACEY AND UGA.**

<table>
<thead>
<tr>
<th>Shoreline</th>
<th>Jurisdiction/Group</th>
<th>Project Description</th>
<th>Restored Processes &amp; Functions</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Lake</td>
<td>City of Lacey Parks/Public Works</td>
<td>Stormwater treatment facility/wetlands (Horizon Point Park).</td>
<td>Stormwater treatment facilities generally promote flood flow retention, the removal of pollutants/sediment through sedimentation and adsorption, and mitigation of upland sediment generation. Wetlands perform these same functions and also help with groundwater recharge and low summer flows while providing shoreline habitat for wildlife such as invertebrates, birds, amphibians, reptiles, and mammals.</td>
</tr>
<tr>
<td>Benefit</td>
<td>Departments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hicks Lake</td>
<td>City of Lacey Parks/Public Works</td>
<td>Stormwater treatment facility/wetlands.</td>
<td>See ‘General Lake Benefit’.</td>
</tr>
<tr>
<td></td>
<td>Departments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Long Lake</td>
<td>City of Lacey</td>
<td>Stormwater mitigation area at north end of lake (wetland).</td>
<td>See discussion of wetlands under ‘General Lake Benefit’.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>City of Lacey</td>
<td>Infiltration area at north end of lake.</td>
<td>Infiltration areas promote groundwater recharge and mitigate low summer flows.</td>
</tr>
<tr>
<td>Pattison Lake</td>
<td>City of Lacey Parks/Public Works</td>
<td>Stormwater treatment facility/wetlands (Lakepoint Park).</td>
<td>See ‘General Lake Benefit’.</td>
</tr>
<tr>
<td></td>
<td>Departments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southwick Lake</td>
<td>City of Lacey Parks/Public Works</td>
<td>Stormwater treatment facility/wetlands constructed by the City (Rainier Vista Park).</td>
<td>See ‘General Lake Benefit’.</td>
</tr>
<tr>
<td></td>
<td>Departments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Woodland Creek</td>
<td>Lacey Stream Team</td>
<td>Installing fish weirs, depositing spawning gravel, native plant revegetation, and invasive removal.</td>
<td>These projects will restore shoreline habitat for wildlife, including invertebrates, birds, amphibians, reptiles, and mammals. Native plant revegetation provides erosion control. Depending on the size of native plantings, there is a potential for future sources of LWD.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Woodland Creek</td>
<td>Thurston County, Lacey Stream Team</td>
<td>Repairing drywells and bioswales, construction of rain gardens.</td>
<td>Flood flow retention, removal of pollutants, and providing vegetation for habitat (bioswales and rain gardens). They also promote groundwater recharge.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shoreline</td>
<td>Jurisdiction/Group</td>
<td>Project Description</td>
<td>Restored Processes &amp; Functions</td>
</tr>
<tr>
<td>------------------------</td>
<td>---------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Woodland Creek</td>
<td>St. Martin’s University, City of</td>
<td>Construction of water quality treatment ponds that collect stormwater from 430 acres that drains to Woodland Creek.</td>
<td>See description of ‘stormwater treatment facilities’ under ‘General Lake Benefit’.</td>
</tr>
<tr>
<td>WOOD-1</td>
<td>Lacey</td>
<td>Purchased a 4.4 acre parcel along creek to enhance protection of the stream corridor, performed riparian revegetation at site.</td>
<td>Revegetation helps promote flood flow retention, provides erosion control and storage of phosphorus and nitrogen while providing habitat for wildlife and a potential future source of LWD.</td>
</tr>
<tr>
<td></td>
<td>Lacey Stream Team</td>
<td>Removed concrete armoring from the stream channel at the outlet of Lake Lois, added spawning gravel to Woodland Creek immediately downstream. Location is upstream from the SMA-affected reaches of Woodland Creek.</td>
<td>The addition of spawning gravel will enhance shoreline habitat for fish, especially salmonids.</td>
</tr>
<tr>
<td>Woodland Creek Both Reaches</td>
<td>Lacey Stream Team</td>
<td>Ongoing efforts to revegetate the riparian buffer in Woodland Creek Community Park. Location is upstream from the SMA-affected reaches of Woodland Creek.</td>
<td>See revegetation project described above under WOOD-1.</td>
</tr>
<tr>
<td></td>
<td>City of Lacey Parks Department</td>
<td>Pond and stream restoration at Woodland Creek Community Park, as part of an overall construction project at the site.</td>
<td>This project will enhance shoreline habitat for wildlife.</td>
</tr>
</tbody>
</table>
VI. Other Restoration Opportunities

The new proposed update to the Shoreline Master Program provides for protection and restoration opportunities along developed shoreline parcels as redevelopment occurs through the requirement for a Shoreline Vegetation Conservation Management plan. The idea is to slowly replace lawns and turf along shorelines with native vegetation as mitigation, as when shoreline properties develop or redevelop.

The proposed new standards are required apply on parcels with waterfront access when:

- A new structure is constructed
- An existing structure is remodeled and square footage is added
- An accessory structure (such as a garage, deck, or patio) is added
- Any development action requiring a shoreline permit is taken

In order to move toward the goal of restoring native vegetation to shorelines incrementally, the proposal includes a sliding scale for how much vegetation restoration is required. Generally, vegetation will be required when existing vegetation on site is not sufficient to mitigate impacts from the new or expanded use/development or when expansions or new structures are proposed within the setback/vegetation management area.

New Structures

New structures will require a full vegetation plan including retention of native vegetation or replanting to restore vegetation. The plan must be prepared by a qualified forester or landscaper and indicate the type and location of native vegetation, including an overstory, understory, and floor of herbs of native plants. Native vegetation will be required within the designated buffer area that corresponds to the shoreline environment designation and its associated setback.

Additions or Accessory Structures

Additions to current structures which increase the building footprint are also to retain native vegetation or replanting native vegetation. Guidelines are provided in a sliding scale as outlined in the Lacey Please see SMP Chapter 17.41.021, Table 1 in the SMP.
### VII. Metrics and Ongoing Monitoring

Some of the potential metrics to measure progress in restoring ecological function and processes are listed below:

**TABLE 8: POTENTIAL METRICS AND MONITORING.**

<table>
<thead>
<tr>
<th>Metric</th>
<th>Monitoring</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality</td>
<td>Thurston County Water Resources</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Shellfish water quality</td>
<td>State Department of Health</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Critical salt water habitat</td>
<td>Squaxin Island Tribe</td>
<td>Periodic</td>
</tr>
<tr>
<td>Fisheries</td>
<td>Various</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Storm flows</td>
<td>USGS monitoring stations</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Marine bulkheads</td>
<td>Thurston Regional Planning Council</td>
<td>Periodic evaluations</td>
</tr>
<tr>
<td>Lake shoreline armoring</td>
<td>None noted</td>
<td>Baseline evaluation should be done</td>
</tr>
<tr>
<td>Docks and Piers</td>
<td>Shoreline Master Program Inventory</td>
<td>Updated in 2008</td>
</tr>
<tr>
<td>Impervious Surfaces by Basin</td>
<td>Thurston Regional Planning Council</td>
<td>Last update in 2000</td>
</tr>
<tr>
<td>Forest Cover</td>
<td>Thurston Regional Planning Council</td>
<td>1985-2000</td>
</tr>
<tr>
<td>Wetland Ratings and Functions</td>
<td>None noted</td>
<td>Baseline evaluation should be done</td>
</tr>
<tr>
<td>Wetland Acreage</td>
<td>Shoreline Master Program Inventory</td>
<td>Updated in 2008</td>
</tr>
<tr>
<td>Contamination sites/cleanup status</td>
<td>State Department of Ecology</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>
VIII. Timelines and Benchmarks in the Context of Restoration Objectives in this SMP

Discussion of organizations doing restoration work is presented in Table 7. For those looking for hard numbers and quantitative data sets, Table 8 presents sources of quantitative study elements provided for future reference. However, while these sources may be helpful in providing baseline data for review and evaluation of change, the data will be of limited value for much of the restoration effort Lacey’s SMP and Restoration Plan are designed to promote and implement.

Expectations for determining timelines and benchmarks for Lacey’s restoration objectives will generally need to be considered in the context of the market and decisions for private investment. Lacey’s SMP is designed to move the community in the direction of restoration objectives by guiding new development, improving landscaping requirements and emphasizing environmentally sound decisions for landowners in management of shoreline properties. These activities involve non-public activities and generally do not lend themselves to reliable forecasts or benchmarks.

Lacey has no control over what the market might do on a macro scale and little if any control on a micro scale for individual property decisions. Development of specific timing expectations and specific benchmarks for measurement of restoration improvements in this arena is not practical or useful.

While significant successes may be realized in restoration objectives through public investment and public sponsored projects, the major restoration advances and the areas of emphasis for this SMP are things that will rely on the individual property owners and decisions on how to manage individual properties. It will also rely to a very large extent on the goal and policy vision set in the SMP and the regulatory language for its implementation.

Restoration strategies that are a focus in the SMP, like improving shoreline vegetation management for habitat and water quality functions, will fall within this private ownership/regulatory arena. Major strides in these areas will be by actions of private property owners developing and managing shoreline properties within the vision established by the community in the SMP and other community planning documents.

A quantitative level of review is not needed for these issues in the context of developing goals, policies and regulatory or incentive strategies for this SMP. Precise numbers are not as important as identifying probable cause and effect and general expectations of a particular course of action. These issues require a qualitative level of consideration. A qualitative process, based upon broad based citizen participation and evaluation of the issues, can achieve timelier and arguably comparable results for community planning purposes.

Lacey can make a difference and achieve restoration objectives by crafting strategies based upon extensive community dialogue and reasoned conclusions of those participating in the update of this SMP. The issues identified and the strategies developed are based on the discussion and reasoned conclusions of Lacey staff, the Planning Commission, the Lacey Council and those citizens and professional resource agency representatives participating in the SMP update.

There are no black and white answers, no spreadsheet that will ever be able to balance community needs, values and objectives. There is no benchmark for measurement that can be trusted to represent all of the variables involved in the complex issues restoration activity might include when encountered in the field.
Instead, community decisions for the effectiveness of restoration objectives will be based upon discussion and open communication with citizens involved in the issues as well as professional staff and resource agency representatives. Given the nature and complexity of these issues and the context decisions must be made in local government, a well developed intuition and reasoned judgment of Lacey’s elected officials must serve as the final benchmark for measurement of success of strategies Lacey uses to achieve shoreline management objectives.

The timelines for judging the success of long range planning objectives are similarly unpredictable and often must be tested and measured in years. For the purposes of this SMP, the timeline is the same 20-year horizon used for other GMA plans. Periodic evaluation, review and refinement of major concepts is expected at least once every 7 years.
IX. Restoration Goals and Policies

Generally: The SMP restoration goals and policies will be implemented through local projects both public and private. These will restore ecological function to the shorelines within the City of Lacey.

This restoration plan is not specific to the shoreline environment designations. In general, preservation areas have been designated Natural and developed areas have been designated Shoreline Residential.

Promoting and assigning priority to the general type of projects discussed and specific projects identified within this plan will improve ecological function by:

- Improving water quality (examples: construction of stormwater treatment facilities, establishing buffers around lakefront property with native vegetation)
- Restoring habitat for a variety of species (examples: invasive plant removal, landscaping buffers around lakefront property with native vegetation including trees)
- Creating new habitat (examples: installation of large woody debris in streams and rivers, restoring native vegetation to lakefront properties)

Specific Goals, Policies and Standards: Restoration goals, policies and development standards that have been developed through update of the SMP are as follows:

Goals and Policies Related to Landscaping:

1. Goal: Over the long term, achieve landscaped shorelines with vegetation supportive of natural shoreline functions and values that will help maintain and improve water quality and habitat.
   
   A. Policy: Limit the removal of vegetation along the shoreline to the minimum necessary to accommodate the approved shoreline development and establish a buffer area of vegetation corresponding to each designation’s setback area.
   
   B. Policy: Native/approved vegetation along the shoreline will be required to further goals of restoration and promote no net loss of ecological function and value. Landscaping plans will require balancing legitimate competing interests. This will include habitat and view corridor opportunities as well as compatibility and integration with the full range of land use activities permitted and expected in the applicable shoreline classification.
   
   C. Policy: The Administrator may allow limited selective pruning of native vegetation for view corridors and some limited clearing for access provided ecological functions are not compromised. The activity shall be reviewed by the City Forester/Arborist and a recommendation provided to the Administrator.
   
   D. Policy: Preserve existing native vegetation along the shoreline and require planting when it does not exist.
   
   E. Policy: Provide flexibility when balancing overlapping shoreline policies and priorities regarding vegetation conservation, a preference for water-dependant uses, and requirements to provide public access.
   
   F. Policy: When remodeled structures are located too close to the ordinary high water mark and do not have room to install the normal vegetative improvements in the designated buffer area, the...
City will require planting with vegetation the site can reasonably accommodate within the buffer area. In addition, to offset and mitigate impacts that occur for lack of adequate vegetative buffering, the city may require a commensurate amount of vegetation on other offsite priority restoration areas.

G. Policy: Vegetation management development standards for the buffer shall apply to a new structure, to remodeled structures which add square footage, to the addition of an accessory structure, and any permit for a shoreline parcel(s) with waterfront access.

H. Policy: Intact native shoreline vegetation shall be comprised of three vegetative levels including an overstory of trees, an understory of shrubs, and a floor of herbs of native plants commonly found in riparian areas of Thurston County.

I. Policy: When intact native shoreline vegetation is lacking, required areas shall be planted to resemble native riparian vegetation or equivalent from the standpoint of function and value, see Table 1. This canopy should also have an understory of native plants commonly found in riparian areas of Thurston County or of benefit to lake shoreline in Lacey.

J. Policy: A Shoreline Vegetation Management Plan shall address shoreline function and values.

K. Policy: Vegetation conservation development standards shall not apply to the removal of aquatic weeds and fresh water algae undertaken pursuant to WAC 173-201.

L. Policy: Additional tree regulations and policy can be found in Chapter 14.32 of the Lacey Municipal Code and Lacey's Urban Forest Management Plan. Per Section 17.35.010, the more restrictive development standard applies.

M. Policy: The City of Lacey Critical Area Ordinances, including the ordinances for the protection of habitat and wetland areas, requires vegetation along a shoreline or wetland. These requirements will overlay those found within this section. Per Section 17.35.010, the more restrictive development standard applies.

2. Goal: Develop landscaping guidelines that will achieve goals for restoration and that are useful for property owners and will encourage and promote ecological friendly property management.

A. Policy: Utilize the stated goals and policies for each of the different shoreline use and activities sections to explain to citizens the reasons for the regulations.

B. Policy: Develop and provide examples of landscaping strategies and plans citizens can use to implement important concepts on their own property.


A. Policy: Because of the importance of native vegetation in managing water quality, the City shall promote public education on this topic and help inform citizens of the purpose and need for retention/replanting/restoration of shoreline area to perform natural drainage mitigation.

B. Policy: Develop a full range of techniques for informing the public of shoreline vegetation requirements as well as basic information regarding shoreline functions and values and how vegetation management is an ecologically friendly way of maintaining shoreline property.

C. Policy: The City will support efforts of realtors and work in partnership with the local Board of Realtors in informing new and existing lot owners of requirements of protective covenants and proper vegetation management. This may include a range of strategies such as educational
presentations at realtor membership meetings, presentations to home owner associations, scheduling informational meetings with lot owners or perspective buyers and helping to develop brochures for general circulation to interested groups.

Goals and Policies Related to General Restoration:

1. Goal: Identify and take advantage of restoration opportunities where restoration goals can be integrated into the design and planning of public or private shoreline development projects.
   
   A. Policy: Recognize that restoration and enhancement may result from:
      1) Mitigation of impacts from new development.
      2) Adoption of shoreline setbacks with a buffering function which are based upon shoreline ecological functions and processes.
   
   B. Policy: Reestablish, rehabilitate and/or otherwise improve impaired shoreline ecological functions and/or processes through voluntary and incentive-based public and private programs and actions that are consistent with this master program and other approved restoration plans.
   
   C. Policy: Restore and enhance shoreline ecological functions and processes as well as shoreline features through voluntary and incentive-based public and private programs.

2. Goal: Where opportunities are present, work with other state and local jurisdictions in planning and implementation of restoration projects that cross jurisdictional boundaries.
   
   A. Policy: Encourage and facilitate cooperative restoration and enhancement programs between local, state, and federal public agencies, tribes, non-profit organizations, and landowners to address shorelines with impaired ecological functions and/or processes.

   
   A. Policy: Integrate restoration and enhancement with other parallel natural resource management efforts such as the WRIA 13 Salmonid Recovery Plan, Puget Sound Salmon Recovery Plan, and the City of Lacey Comprehensive Land Use Plan and its Environmental Protection and Resource Conservation element.
   
   B. Policy: Ensure restoration and enhancement is consistent with and, where practicable, prioritized based on the biological recovery goals for early Chinook, bull trout populations and other species and/or populations for which a recovery plan is available.
   
   C. Policy: Target restoration and enhancement towards improving habitat requirements of priority and/or locally important wildlife species.
   
   D. Policy: Restoration shall be carried out in accordance with an approved shoreline restoration plan and in accordance with the policies and regulations of this SMP.
   
   E. Policy: Prioritize restoration actions and stand-alone projects in the following order:
      1) Create dynamic and sustainable ecosystems.
      2) Restore connectivity between stream channels, floodplains and hyporheic zones.
      3) Restore natural channel-forming geomorphologic processes.
      4) Mitigate peak flows and associated impacts caused by high stormwater runoff volume.
      5) Reduce sediment input to streams and associated impacts.
      6) Improve water quality.
      7) Restore native vegetation and natural hydrologic functions of degraded and former wetlands.
      8) Replant native vegetation in riparian areas to restore functions.
9) Restore nearshore ecosystem processes, such as sediment transport and delivery and tidal currents that create and sustain habitat.
10) Restore pocket estuaries that support salmon life histories, including feeding and growth, refuge, osmoregulation, and migration.
11) Remove obsolete and no longer needed shoreline modifications.

4. Goal: Achieve natural beach areas by restoration that meets needs of the land owner without hard-armoring.
   1. Policy: Ensure that permits for beach restoration and enhancement projects address the goals, policies and development standards within the Shoreline Ecological Function Chapter 17.40.
   2. Policy: Give preference in permitting beach restoration and enhancement projects which use naturally regenerating systems, rather than bulkheads and other structures to prevent and control beach erosion where:
      A. The length and configuration of the beach will accommodate such systems.
      B. Such protection is a reasonable solution to the needs of the specific site.
      C. Beach restoration/enhancement will accomplish one or more of the following objectives:
         1) Recreate or enhance natural shoreline conditions.
         2) Create or enhance natural habitat.
         3) Reverse otherwise erosion-prone conditions.
         4) Enhance access to the shoreline, especially to public shorelines.
   3. Policy: Design and construct beach enhancement projects so that they will not degrade aquatic habitats, water quality and flood holding capacity.
   4. Policy: Prefer self-maintaining designs over those which depend upon regular maintenance.
   5. Policy: Require supplementary beach nourishment where structural stabilization works are likely to increase impoverishment of existing beach materials at or downdrift from the project site.
   6. Policy: Limit the waterward extent of beach enhancement to that which is necessary to achieve the intended results.
   7. Policy: Encourage the use of dredged materials for beach restoration and enhancement projects when it has suitable organic and physical properties.
X. Summary

The Restoration Plan is designed to meet the requirements for restoration planning outlined in the Department of Ecology Guidelines. A Restoration Plan is not a regulatory document or a set of regulatory requirements.

This plan is meant to be used as a resource for shoreline restoration planning for Lacey, identifying priorities and potential restoration opportunities.

Restoration efforts identified in Table 6 are ongoing and may change. Table 6 shows specific projects that were planned at the time of the Plan’s development. Discussion in Tables 4 and 5 present various priorities based upon current knowledge and possible opportunities that may become available. These conclusions may also change.

This Plan should be used as a guidepost on the types of activities that may prove beneficial in achieving desired outcomes and priority for restoration activities based upon current available science and knowledge. It is not intended to be a regulation that sets one way to approach restoration policy, but only a reasoned intent to follow.

The best restoration strategy will be to plan for what the City can identify now, continue to look for and identify opportunities that may become available in the future and a willingness to try new innovative approaches to accomplish public objectives. This will require flexibility in how we approach each project. It will require a willingness to develop implementation solutions based upon each situation’s unique features, the opportunity it presents and the customer service needs of the people involved.
XI. Resources Used in Developing this Plan

City of Lacey, 2008. Lacey Comprehensive Plan, (including Capital Facilities Chapter).
City of Tumwater, 2008. Tumwater Comprehensive Plan (including Capital Facilities Chapter).
City of Tumwater, 2007. City of Tumwater Parks, Recreation and Open Space Plan, Draft.
Thurston Regional Planning Council, 2008. Draft Shoreline Inventory for the Cities of Lacey, Olympia, and Tumwater and their UGAs.
Thurston County, 2008. Thurston County Comprehensive Plan (including Capital Facilities Chapter).
I. Introduction

A. Background

This report is the final proposed cumulative impacts analysis for the City of Lacey and its urban growth area (UGA). The report has been created as part of the Shoreline Master Program for the City and added to the Lacey Master Program as Appendix 5.

Local master programs are required to evaluate and consider cumulative impacts of reasonably foreseeable future development on shoreline ecological functions. While some impacts are immediate and can be directly addressed through avoidance and mitigation, other impacts are cumulative in nature. Individually, the action may not result in a significant impact, but the composite of many similar actions over time may lead to a significant cumulative impact to the ecosystem. Examples of this may be shoreline bulkheads or docks.

Under shoreline SMP Guidelines, the evaluation of cumulative impacts should consider (WAC 173-26-186(8)(d)):

- Current circumstances affecting the shorelines and relevant natural processes
- Reasonably foreseeable future development and use of the shoreline
- Beneficial effects of any established regulatory programs under other local, state, and federal laws

A cumulative impacts analysis is required to assess the effects of actions allowed under the proposed policies and regulations. The guidelines state that: “To comply with the general obligation to assure no net loss of shoreline ecological function, the process of developing the policies and regulations of a shoreline master program requires assessment of how proposed policies and regulations cause and avoid such cumulative impacts.”

Note:
This Cumulative Impacts Analysis is based on the Proposed SMP Regulations and Environmental Designations as of June 2010.

Comment [CB1]: Removal of this statement is suggested because the final CIA has been slightly refined to match the locally adopted SMP with changes as required by Ecology, dated October 2010.
B. Timeline

A timeline for the complete Shoreline Master Program update (a multi-year program) is below:

TABLE 1: TIMELINE FOR THE SHORELINE MASTER PROGRAM UPDATE FOR THE CITY OF LACEY

<table>
<thead>
<tr>
<th>Phase</th>
<th>Update Schedule</th>
<th>Timeline</th>
</tr>
</thead>
</table>
| 1     | A. Determine what shorelines are regulated under the act  
      | B. Conduct an inventory of all existing and available data for shorelines  
      | C. Public Open Houses | Timeline Winter 2008. Accomplished under Regional contract with DOE |
| 2     | A. Analyze and characterize shoreline conditions | Spring 2008. Accomplished under Regional contract with DOE |
| 3     | A. Categorize each shoreline segment into a designation such as urban, suburban, or rural. Each will have a different set of rules.  
      | B. Develop draft rules and policies  
      | C. Public meetings | Fall 2008 Winter-Spring 2009. Draft accomplished under Regional contract with DOE |
| 4     | A. Analyze the cumulative impacts of expected shoreline development or redevelopment  
      | B. Develop a restoration (and preservation) plan, including public access | Winter-Spring 2009. Accomplished under Regional contract with DOE and refined by Lacey early 2010 |
| 5     | A. Public hearings  
      | B. Planning Commission recommendations  
      | C. City Council approval  
      | D. State approval | In process. Expected completion date is late 2010 |
C. Methods and Sources of Information

This cumulative impacts analysis is built upon the assessment of current circumstances affecting the shorelines and relevant natural processes as identified in the Shoreline Inventory and Analysis (Phase 1).

In Lacey, the assessment of reasonable foreseeable future development and use of the shoreline can be described as a comprehensive process involving both consideration and a focus on micro (site or project specific type issues) as well as macro or bigger picture concerns. The micro focus issues includes a project specific level for things, such as impacts from a typical development project and details of how the mechanics would work with administration of permits and customer service at the counter. Basically, where the rubber meets the road and where you have to figure out how your strategies for environmental protection, restoration, etc. will actually work on the ground.

Macro (bigger picture) considerations will involve concepts that are harder to define and predict, but are nevertheless important because they will have an impact on the context the community will find itself in at some future point. These considerations include such things as expected community demographics, market conditions, and the expected likely development scenarios and land use expectations given these other considerations and the requirements of GMA.

An attempt to describe the process for development of this plan and its results is summarized in the following bulleted discussion points:

- This review necessarily requires a project level analysis, not only of known projects but a consideration of “typical” site specific projects and impacts that have historically occurred and could be expected to occur given market conditions, demographics and different regulatory scenarios under GMA. It includes consideration of real projects listed in Lacey’s Capital Facilities Plan and imagined plans and projects that could occur.

- After Regional Planning’s original development of the first cumulative impacts draft, this analysis was coordinated by Lacey staff as a regular part of agenda discussions during the Planning Commission’s update of the SMP.

- Major conclusions of the cumulative impacts assessment and strategy to deal with the issues it presents were largely identified, developed and refined through extensive discussion and examination of issues, problems, solutions and expectations during the nine months the Planning Commission spent on the SMP update effort.

- Planning Commission agendas included participation and the specialized knowledge base and values brought to the table by state resource agencies, interested citizens, land owners and members of the development community.

- As a result of this project level review, specific projects with known impact and situations considered “typical” and “most likely to occur” based upon historical application and counter experience were emphasized and given priority for development of protection and restoration strategies.

- To craft strategies for protection and restoration of shoreline resources, staff and the
Planning Commission discussed identified issues and ideas with resource agencies and utilized material provided by resource agencies. This discussion and analysis
resulted in development of goals, policies and standards for sections of the SMP dealing with the respective topic areas.

- This effort took place in the context of the bigger picture the Planning Commission and staff are always required to work within considering a big picture assessment of past development activity and trends, expectations for the City’s future and the overall vision for the Lacey community that gets articulated in the Comprehensive Land Use Plan and its many specialized elements.

- The SMP update and consideration of expected outcomes (cumulative impacts) is folded within this scope of work as the specialized element that requires the protection, wise management and utilization of Lacey’s shoreline resources to meet the needs of state law as well as its local citizens. All of this is part of the visioning process that will guide the City as it develops and evolves under GMA.

- As part of the bigger picture assessment and cumulative impacts, consideration is given to environmental legislation Lacey currently has on the books to implement GMA concepts and requirements as well as new policies and standards for regulating shoreline development.

- To assess likely long term impacts to shoreline resources, this level of analysis necessarily includes the beneficial results from implementation of new strategies identified at the project level considering the emphasis and expectation of no net loss of function and value.

- Beneficial effects of any established regulatory programs under other local, state, and federal laws is also derived from an evaluation of the proposed regulations and policies to ensure no net loss of ecological function.

D. Regulatory Framework

As discussed above considering the context of the “bigger picture,” the Shoreline Master Program is one element under the City’s GMA Comprehensive Land Use Plan. Development activity in Lacey and the unincorporated urban growth area in Thurston County is regulated under a joint Comprehensive Land Use Plan and Zoning Code and separate critical area regulations. The SMP is the element that regulates activity within shorelines jurisdiction.

There are other state and federal regulations that also may apply to shoreline development activities.
E. Shorelines

Table 2 lists the shorelines identified in the Shoreline Inventory for Lacey and its Urban Growth Area (UGA), classified into functional systems.

**TABLE 2: SMA SHORELINES AND FUNCTIONAL SYSTEMS FOR LACEY, OLYMPIA, TUMWATER AND UGAS.**

<table>
<thead>
<tr>
<th>Type</th>
<th>Area</th>
<th>System</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marine Waters</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nisqually Reach</td>
<td>Lacey &amp; UGA</td>
<td>Nearshore/Marine</td>
</tr>
<tr>
<td>Rivers/Streams</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Woodland Creek</td>
<td>Lacey &amp; UGA</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Lakes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chambers Lake</td>
<td>Lacey &amp; Olympia</td>
<td>Freshwater Lake</td>
</tr>
<tr>
<td>Hicks Lake</td>
<td>Lacey</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Long Lake</td>
<td>Lacey &amp; UGA</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Pattison Lake</td>
<td>Lacey &amp; UGA</td>
<td>Woodland Creek System</td>
</tr>
<tr>
<td>Southwick Lake</td>
<td>Lacey &amp; UGA</td>
<td>Freshwater Lake</td>
</tr>
</tbody>
</table>
II. Current Circumstances and Ecological Functions

Current shoreline circumstances and relevant natural processes were documented in Phase 1 of the Shoreline Master Program update in the Shoreline Inventory for the Cities of Lacey, Olympia, and Tumwater and their Urban Growth Areas and the Lacey, Olympia, and Tumwater Shoreline Analysis and Characterization Report.

These evaluations led to the development of draft Shoreline Environment Designations (SEDs) for each shoreline reach. This evaluation was continued as part of Lacey’s review during the Planning Commission’s consideration of specific projects and specific sites considered priority for environmental protection. At this point, reach conditions, restoration issues and potential opportunities associated with various scenarios were discussed to determine the best strategies and techniques for protection and achieving the objective of no net loss.

For Lacey, ecological functions expected to be at risk from increased urbanization were initially evaluated by consultants during the analysis and characterization phase and later by the Lacey staff and Planning Commission during Lacey’s SMP update process. The Planning Commission’s involvement focused on development activity expected under the City’s Comprehensive Land Use Plan and expectations of the Growth Management Act (GMA) and the best land use strategies to achieve no net loss of the functions and values of Lacey’s shoreline resources. Scenarios, land use strategies and likely outcomes were considered and discussed and specific land use goals, policies and standards were developed for the SMP dealing with the following shoreline systems:

- Nearshore/Marine Environment – Nisqually Reach
- Woodland Creek System – Woodland Creek, Long Lake, Pattison Lake, and Hicks Lake
- Other Freshwater Lakes – Southwick and Chambers Lake

Key processes and functions identified for Lacey’s shorelines and their current level of alteration are summarized in Tables 3-5 below. These tables also include discussions of the alteration, impact and potential for risk to ecological function from foreseeable future development and an assessment of ability of the policies and regulations in this SMP to offset or mitigate for impacts from such development. This assessment covers shorelines both within restoration opportunities is also included for the City and shorelines in portions of the urban growth area (UGA) that is in unincorporated Thurston County. Discussion of areas in the County is considered important, particularly where designations and anticipated development could impact areas within Lacey. However, it should be noted that area within Lacey’s UGA, in unincorporated Thurston County, is not under the regulatory preview/purview of this SMP. Discussion of the UGA is included here only for the purposes of joint planning and interagency coordination of restoration activity, and to assess how the City’s SMP would achieve no net loss if these areas were annexed and regulated under the City’s SMP.
### TABLE 3: PROCESSES, FUNCTIONS, AND LEVEL OF ALTERATION FOR THE NEARSHORE/MARINE ENVIRONMENT.

<table>
<thead>
<tr>
<th>Nearshore/Marine Environment – Nisqually Reach</th>
<th>Level of Existing Alteration</th>
<th>Potential Future Impacts and Potential Risk</th>
<th>Proposed Restoration/Protection Measures; Draft SMP Policies/Regulations and other Environmental Codes</th>
<th>Non-Regulatory Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Habitat: Pocket estuarine habitat; subtidal and intertidal provide transition habitat between fresh and salt water environments.</td>
<td>Nisqually 1 – Extremely Low The Butterball Cove area and the marine shoreline within Lacey to the east of Butterball Cove are substantially unaltered. The only alteration is a historical pier (Atlas Powder Wharf) that exists east of Butterball Cove. The pier was associated with DuPont dynamite operations in the 1940s. However, it is nonfunctional today. An existing access to this area is provided by the Hawks Prairie Planned Community. It includes an outlook overlooking the</td>
<td>Nisqually 1 – Extremely Low The majority of this area is currently designated as open space in the Hawks Prairie Planned Community. No impacts are currently identified and none are predicted. The existing access to the beach is at the site of the historical pier. Thought has been given to opportunity for a public access and use of the pier for fishing or other recreation opportunities. Establishing this type of public use would be expected to have the potential for impact. However, the pier would require significant repair or replacement for safety. If modification were proposed, mitigation and no net loss standards would be applied to any such project. It is also noted that access is owned by the HPPC HOA and</td>
<td>Nisqually 1 – the following provisions are applicable: 1. Designation as Natural: The proposed SMA designation of Natural and its associated restrictions on the types of use and development is expected to protect preserve functions within this reach; shoreline map designation and Tables 3, 4 and 5. 2. Marine Riparian Habitat Requirements: Criteria for development are designed to protect the Natural designation; SMP Sections 17.35.030 – 17.35.036. Any repair of the existing pier or new modifications would be subject to no net loss standards and criteria cited above. 3. Master Plan and Plat Requirements: Designation of the area as open space in the</td>
<td>Nisqually 1 Work with Hawks Prairie Planned Community HOAs to help maintain existing access and provide environmentally friendly improvements. Discuss with HOA potential Lacey ownership with HOA, for maintenance issues.</td>
</tr>
</tbody>
</table>

*Exhibit C-11: Continuation of Recommended Change “App S”*
beach and a pedestrian beach access trail. The access has had little impact to the overall shoreline structure or processes.

while access is not restricted to HOA members it is not formally open to the general public. As such, any project for access and use of the pier is speculative and not planned at this time.

Hawks Prairie Master Planned Community restricts use to activity appropriate to this reach; Master Plan Approval HPPC and subdivision requirements of LMC 15.
<table>
<thead>
<tr>
<th>Nearshore/Marine Environment – Nisqually Reach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Process: Function</strong></td>
</tr>
</tbody>
</table>
| Nisqually 2A and B - Moderate | Nisqually 2A and B - Moderate | Nisqually 2A and B – Low Shoreline Modifications in this area are expected to persist continue over the long term to provide for established access and recreational use. Maintenance activities will continue and need to be properly designed. Opportunities may come available for restoration as maintenance takes place. | Nisqually 2A and B – SMP Policies and incentives focused on restoration are expected to incrementally move improvements in a positive direction to achieve restoration objectives. An example is the recent salmon recovery project that will improve habitat and reverse a trend existing for the proceeding 50+ year period. Specific provisions that apply are as follows:  
- New SMP provisions—discuss Section 17.49.010.  
- Policies Section 17.49.010, policies 1 and 2 and 4 under policies for marinas.  
- Standards Section 17.49.0240, Beachcrest marina standards 2 and 3. | Nisqually 2A and B Work with the Beachcrest HOA to craft incentives for restoration and improvements to vegetation management through education. The South Sound Salmon Enhancement Group (SSSEG) An example is the recently completed a salmon recovery project along this reach, which that will improve habitat and reverse a trend existing for the proceeding 50+ year period. |
| **Hydrology:** Attenuation of wave energy. | Nisqually 1 – Extremely Low No modifications have been made to this | Nisqually 1 – Extremely Low The proposed designation of Natural and restrictions on | Nisqually 1 Work with Hawks Prairie Planned Community HOAs |

Exhibit C-11: Continuation of Recommended Change “App S”
| Area of shoreline under Lacey jurisdiction. See discussion above dealing with existing conditions. | Development are expected to protect this reach. New modifications would be subject to marine riparian habitat criteria and no net loss provisions. There are no structures on this shoreline that would justify a modification. Improvement of the one historical modification (pier) would require City ownership and compliance with no net loss policy. | 1. Designation as Natural: The proposed SMA designation of Natural and its associated restrictions on the types of use and development would not permit new modifications; shoreline map designation, Tables 3, 4 and 5.  
2. Marine Riparian Habitat Requirements: Associated criteria for development are designed to protect the Natural designation; Sections 17.35.030 – 17.35.036.  
3. Master Plan and Plat Requirements: Designation of the area as open space in the Hawks Prairie Master Planned Community restricts use to activity appropriate to this reach; Master Plan Approval HPPC and subdivision requirements of LMC 15.  
4. Armoring provisions in Section 17.45.000-.015 allow new hard shoreline stabilization structures only where necessary. | to help maintain existing access and provide environmentally friendly improvements. Discuss potential Lacey ownership with HOA, for maintenance issues. |
<table>
<thead>
<tr>
<th>Process: Function</th>
<th>Level of Existing Alteration</th>
<th>Potential and Future Impacts</th>
<th>Proposed Restoration/Protection Measures; Draft SMP Policies/Regulations and other Environmental Codes</th>
<th>Non-Regulatory Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nearshore/Marine Environment – Nisqually Reach</td>
<td>Nisqually 2A and B – Moderate to High Armoring of marina area and access road has changed tidal and wave energy dynamics in this area.</td>
<td>Armoring of marina area and access road has changed tidal and wave energy dynamics in this area.</td>
<td>City ownership and compliance with no net loss policy.</td>
<td>Nisqually 2A and B Work with the Beachcrest HOA and County in joint planning to craft incentives for restoration.</td>
</tr>
<tr>
<td>Nisqually 2A and B – Moderate to High Armoring of marina area and access road has changed tidal and wave energy dynamics in this area.</td>
<td>Nisqually 2A and B - Moderate to Low. Maintenance activities associated with existing modifications will continue over the long term, however little new development is anticipated. Opportunity may exist for some additional restoration as these maintenance activities take place.</td>
<td>3. Marine Riparian Habitat Requirements:– Associated criteria for development are designed to protect the Natural designation. Sections 17.35.030—17.35.035. 3. Master Plan and Plat Requirements:– Designation of the area as open space in the Hawks Prairie Master Planned Community restricts use to activity appropriate to this reach; Master Plan Approval HPPC and subdivision requirements of LMC. 45.</td>
<td>Nisqually 2A and B Policy and incentives focused on restoration are expected to incrementally move improvements in a positive direction to achieve restoration objectives. Policies applicable.</td>
<td></td>
</tr>
</tbody>
</table>
| Sediment Generation and Transport: Sediment delivery from coastal bluffs and streams. | Nisqually 1 – Extremely Low  
Natural processes have been maintained in this area. The current open space designation and plat limitation have protected this area. The City’s Critical Area Ordinances have protected the streams feeding pocket estuaries. | Nisqually 1 – Extremely Low  
No new activities in shorelines jurisdiction expected. New upland development is limited to areas outside critical area buffers and likely even outside of shoreline jurisdiction, requires tree protection, and must meet new drainage manual requirements. | Nisqually 1 – The following provisions are applicable:  
1. Designation as Natural:  
The proposed SMA designation of Natural and its associated restrictions on the types of use and development would protect this area; shoreline map designation, Tables 3, 4 and 5.

*To required for maintenance of modifications is expected to achieve gain compliance with objectives over time; discussion Section 17.49.010 policies 2 and 4, Section 17.49.020 relating to Beachcrest, standards 2 and 3.*
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Transport: Sediment delivery from coastal bluffs and streams.</td>
<td>maintained in this area. The current open space designation and plat limitation have protected this area.</td>
<td>jurisdiction expected. New upland development is limited to areas outside critical area buffers, requires tree- protection and must meet new drainage manual requirements.</td>
<td>1. <strong>Designation as Natural:</strong> The proposed SMA designation of Natural and its associated restrictions on the types of use and development would protect this area. Shoreline map designation, Tables 3.4 and 5. 2. Marine Riparian Habitat Requirements: Associated criteria for development are designed to protect the Natural designation; Sections 17.35.030 – 17.35.035. 3. Master Plan and Plat Requirements: Designation of the area as open space in the Hawks Prairie Master Planned Community restricts use to activity appropriate to this reach. Upland development is restricted to areas outside critical area and buffers and outside area designated as open space in the planned</td>
<td></td>
</tr>
</tbody>
</table>
community (which includes the bluff areas); Master Plan Approval HPPC and subdivision requirements of LMC.

4. Armoring provisions in Section 17.45.000-.015 allow new hard shoreline stabilization structures only where necessary.

5. Lacey’s critical area provisions, as incorporated into this SMP in Section 17.35.020, will continue to protect the sediment sources and delivery routes in these streams and bluffs.
### Nearshore/Marine Environment – Nisqually Reach

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Nisqually 2A and B – Moderate Armoring of shoreline for the marina and access road would be expected to have changed longshore drift dynamics. The standpipe may have affected sediment delivery to the drift cell.</td>
<td>Nisqually 2A and B – Low Maintenance of existing modifications will continue for existing modifications. New development is not anticipated. No net loss standards will be required for any maintenance and repair. Incentives will be offered to the HOA to further restoration objectives.</td>
<td>Nisqually 2A and B Policy and incentives focused on restoration are expected to incrementally move improvements in a positive direction to achieve restoration. The existing situation will not be permitted to get worse. Improvements will likely be incremental and will take time. See discussion above regarding references to SMP criteria and standards and other applicable environmental legislation.</td>
<td>Nisqually 2A and B See discussion of recent restoration above. In addition, work with the HOA is ongoing. Incentive ideas and partnering in restoration opportunity will be ongoing.</td>
<td></td>
</tr>
<tr>
<td>Water Quality: Wetland removal of pollutants through sedimentation and adsorption.</td>
<td>Nisqually 1 – Extremely Low Lacey’s wetland protection regulations and tree protection regulations that predated GMA requirements have effectively preserved and protected associated upland wetlands and estuarine.</td>
<td>Nisqually 1 – Extremely Low Wetlands primarily associated with the marine shoreline have not experienced pressure for urbanization until recently. Upland property in the HPPC was “reserved” for future development in the early Master Planned Community and was never developed. After Lacey</td>
<td>Nisqually 1 The proposed designation of Natural and restrictions on upland development and preservation of wetland areas and buffers are expected to protect this function; see SMP sections cited above and requirements of LMC Chapter 14.28</td>
<td></td>
</tr>
</tbody>
</table>

Exhibit C-11: Continuation of Recommended Change “App 5”
<p>| <strong>wetlands.</strong> | annexed the area and became responsible for regulation of development, wetland regulations have been applied in planning undeveloped portions of the Planned Community. Regulations essentially prohibit development in these critical areas. This situation will continue into the future resulting in protection of wetland and buffer functions. | Wetland Protection and 14.32 Tree Protection, as incorporated into this SMP. |</p>
<table>
<thead>
<tr>
<th>Nearshore/Marine Environment – Nisqually Reach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Process: Function</strong></td>
</tr>
<tr>
<td>Nisqually 2A and B – Moderate</td>
</tr>
</tbody>
</table>

Exhibit C-11: Continuation of Recommended Change “App 5”
| Water Quality: Delivery, movement, and loss or removal of nutrients, pathogens, and toxicants; storage of phosphorus and removal of nitrogen and toxins through sedimentation and adsorption. | Nisqually 1 – Extremely Low
See description above under water quality. There are no sources, with the possible exception of treated pilings at the Atlas Powder Pier. Pathways for movement and removal have not been altered. | Nisqually 1 – Extremely Low
See description above under water quality. No increase in sources or change to delivery/loss/movement processes is anticipated, because no development is anticipated. | Nisqually 1
See discussion above under water quality. Water quality standards in Section 17.70.000-.010 will also ensure introduction and movement of these types of toxins is minimized. Vegetation management standards in Section 17.41.015-.020 will protect existing vegetation in this reach and the water quality functions it provides in this context. |
| --- | --- | --- | --- |
| Nisqually 2A and B – Moderate
Impacts from existing upland development have occurred; see discussion under water quality above. | Nisqually 2A and B
Impacts are expected to continue from existing upland development. No opportunity is expected for restoration of developed upland areas in terms of considering recovery of streams and/or upland wetlands. See discussion above. Maintenance and replacement of drainage facilities and septic systems may present opportunity for improvements in water quality. This would be expected to result in an. | Nisqually 2A and B
New drainage manual requirements applied to new upland development is expected to be minimal; and repair and improvement of existing septic systems should incrementally move this area is a positive direction for water quality. See discussion above and discussion and provisions in Section 17.70 (Water Quality) of the SMP. Vegetation management standards in Section. | Work with the HOA to reduce pollutant loads from non-septic sources. |
| Incremental improvement in water quality over the long term. | 17.41.015-020 will protect existing vegetation in this reach and the water quality functions it provides in this context. |
## Nearshore/Marine Environment – Nisqually Reach

|-------------------|-----------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------|
| Habitat: Shoreline habitat for wildlife; vegetation provides structure for invertebrates, birds, amphibians, reptiles, and mammals. | Nisqually 1 – Extremely Low See descriptions of existing conditions above. Overall both the shoreline area and immediately adjacent upland area is substantially unaltered. | Nisqually 1 – Extremely Low See description of expectations above. | Nisqually 1 See descriptions of protection requirements and existing conditions level of function above. The following sections are applicable: 1. Natural Designation: SMP map and criteria and standards of Sections 17.35.030 – 17.35.035, 2. Planned -Community Restrictions: Designation of open space and Master Planned Community conditions; LMC Chapter 15 (Plat requirements for

### Wetlands
- Maintenance and replacement of drainage facilities and septic systems may present opportunity for new mitigation in water quality. This would be expected to result in an incremental improvement in water quality over the long term. Positive direction for water quality.
- See discussion above and discussion and provisions in Section 17.70 (Water Quality) of the SMP.
<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>open space). 3. Wetland Protection: LMC Chapter 14.28 as incorporated into this SMP.</td>
<td></td>
</tr>
<tr>
<td>4. Tree Protection Regulations: LMC Chapter 14.32, as incorporated into this SMP.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Vegetation management standards in Section 17.41.015-020 will protect existing vegetation in this reach.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Nearshore/Marine Environment – Nisqually Reach

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Nisqually 2A – Moderate</td>
<td>Some - There has been some reduction in vegetation change with development of the marina and upland development to the southeast.</td>
<td>Nisqually 2A – Low Existing levels of Impacts are expected to continue from existing upland development and expected to continue. No new development or expansion of the marina facility is expected. See discussion above under habitat.</td>
<td>Nisqually 2A Policy and incentives focused on restoration are expected to incrementally move improvements in a positive direction to achieve restoration objectives in that area subject to Lacey jurisdiction. Vegetative restoration is expected to occur under Section 17.49.010-.020 (boating facilities) with normal repair and maintenance at the marina. Vegetation will be protected under Section 17.41.015-.020.</td>
<td></td>
</tr>
<tr>
<td>Nisqually 2B – High</td>
<td>Salmon Shoreline habitat was modified by placement of the access road to the marina and a culvert system that</td>
<td>Nisqually 2B – Low New environmental legislation adopted by the County would be expected to reduce impact.</td>
<td>Nisqually 2B This area was recently a site for a salmon restoration project that was supported and permitted by the Beachcrest HOA. The HOA has demonstrated a willingness to pursue restoration actions. Lacey</td>
<td></td>
</tr>
</tbody>
</table>

**Comment [CB2]:** Change suggested because this is the first discussion of habitat.
| Habitat: Source and delivery of LWD. | restricted tidal exchange and salmon access to a pocket estuary. Upland tree removal for residential development. | No new development is anticipated. Maintenance and repair of existing structures and modifications may occur. | Lacey is proposing incentives to encourage the continuation of this trend. Policy and incentives focused on restoration are expected to incrementally move improvements in a positive direction to achieve restoration objectives in that area subject to Lacey jurisdiction. Vegetation will be protected and maintained, and possibly obtained, under Section 17.41.015-.020. | restoration actions. Lacey is proposing incentives to encourage the continuation of this trend. |

| Nisqually 1 – Extremely Low | Nisqually 1 – Extremely Low Lacey has had an Urban Forest Management Plan and tree protection regulations for over four decades that have controlled the cutting of trees, and prohibited cutting within sensitive areas and their buffers. Regulations have been applied to the Planned Community which has preserved critical Habitat: Source and delivery of LWD. | No new impacts are expected. | No change expected in Lacey. Regulations for the SMP Natural designation, plat restrictions, wetland protection or tree protection will continue to protected ecological function in this reach. This should continue to have positive impacts on habitat and LWD delivery. The following provisions are applicable: 1. Natural Designation: SMP map and criteria and standards of Sections. |  |  |

*Comment [CB3]: Change suggested because these comments relate to the marina, which is not in this reach.*
1. Forested habitat

2. Marine Riparian Habitat will be protected in Section 17.35.031-032.

3. Vegetation management areas have been established in Section 17.41.020.

4. Tree Protection:
   - Goals and policies of Lacey Urban Forest Management Plan (Chapter 1, Section 2 of the Environmental Protection and Resource Conservation Plan).
   - Tree protection requirements in LMC 14.32, as incorporated into this SMP.
<table>
<thead>
<tr>
<th>Nearshore/Marine Environment – Nisqually Reach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Process: Function</strong></td>
</tr>
<tr>
<td>Applied to the Planned Community which has preserved critical forested habitats.</td>
</tr>
</tbody>
</table>
natural LWD processes (there are fewer sources). of riparian trees associated with existing development. This would be expected to make the restoration of LWD processes necessary to LMD problematic.

<table>
<thead>
<tr>
<th>applicable to areas in Lacey:</th>
<th>existing situation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Marine Riparian Habitat will be protected in Section 17.35.031-.032.</td>
<td>1. Marine Riparian Habitat will be protected in Section 17.35.031-.032.</td>
</tr>
<tr>
<td>2. Vegetation management areas have been established in Section 17.41.020.</td>
<td>2. Vegetation management areas have been established in Section 17.41.020.</td>
</tr>
<tr>
<td>3. Tree Protection: • Goals and policies of Lacey Urban Forest Management Plan (Chapter 1, Section 2 of the Environmental Protection and Resource Conservation Plan). • Tree protection requirements in LMC 14.32, as incorporated into this SMP.</td>
<td>3. Tree Protection: • Goals and policies of Lacey Urban Forest Management Plan (Chapter 1, Section 2 of the Environmental Protection and Resource Conservation Plan). • Tree protection requirements in LMC 14.32, as incorporated into this SMP.</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 4: Processes, functions, and level of alteration for the Woodland Creek System.

<table>
<thead>
<tr>
<th>Process/Function</th>
<th>Level of Existing Alteration</th>
<th>Potential Future Impacts and Potential Risk</th>
<th>Proposed Restoration/Protection Measures; Draft SMP Policies/Regulations and other Environmental Codes</th>
<th>Non-Regulatory Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrology: Channel and floodplain connection.</td>
<td>Moderate to Low. Infrastructure such as railroad crossings and roads over the last century has impacted the historical Woodland Creek channel. However, the channel is naturally well defined and there is no significant meandering or floodplain associated with this system. Associated wetlands in this systems for flood absorption have been well protected and preserved.</td>
<td>Very Low New roads, road extensions for connections or widening could have impacts if not properly planned and mitigated. However, transportation policies require consideration of ecological functions and mitigation of identified impacts. No development will be allowed in Woodland Creek’s floodplain-floodway area and the creek has sensitive area buffers of 200 feet prohibiting development within protected areas. Wetland regulations and the Natural designation will prohibit development in the large associated wetland complexes associated with this system will and ensure these areas are continue to be protected.</td>
<td>The following provisions are applicable: 1. SMP Transportation Section 17.68: Requires consideration of ecological function, mitigation sequencing, and design for least impact to shoreline resources. 2. SMP Minimum Setbacks Section 17.24.015 Table 4: Requires minimum setbacks and location of infrastructure outside shoreline jurisdiction where feasible. 3. Flood Hazard Ordinance LMC 14.34, as incorporated into this SMP and New FEMA Requirements: Prohibits development in a designated floodplain-floodway. 4. Woodland Creek-Sensitive Area Buffers: 200 foot buffer requirement for all development, LMC 14.33.117, as incorporated into this SMP.</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Comment [CB4]: Same changes suggested as made to table 4 in Appendix 3 (Exhibit C-10).

Comment [CB5]: Suggested FEMA NFIP bi-op not be referenced; this process and these requirements are still under development.

Comment [CB6]: This change is suggested because 14.34 does not prohibit construction in the floodplain, only the floodway.
<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>5.</td>
<td>Wetland Ordinance LMC 14.28, as incorporated into this SMP: Prohibits development in wetlands or associated buffers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Armoring provisions in Section 17.45.000-.015 prohibit armoring unless these connections are maintained. In addition, hydrologic connections in these systems have been given a protective Natural designation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>Critical freshwater habitat regulations in Section 17.35.039 prohibit structures, uses and modifications that are not water dependent from location in these areas.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td>Policies, development standards and setbacks for trails in Table 4 and sections 17.62.000-.030 will ensure water oriented trails do not negatively affect this function.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Woodland Creek System - Woodland Creek, Long Lake, Pattison Lake, and Hicks Lake

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrology: Summer low flows.</td>
<td>Moderate to Low</td>
<td>High</td>
<td>Low Preservation of wetlands and headwater lakes will help maintain base flows to Woodland Creek. New drainage manual requirements and ongoing mitigation for potable water rights is designed to mitigate impacts to hydrology. New development in the basin will primarily be located outside of shoreline jurisdiction. Impacts will not be allowed to increase and mitigation is expected to result in no net loss for this function. Use of stormwater management practices with new development or redevelopment that encourage low impact development may minimize or reduce impervious surfaces in the basin over the long term. New SMP standards for buffers and vegetation restoration.</td>
<td>New development or residential densification within shoreline jurisdiction is not anticipated. There are very few vacant, developable lots on shorelines in this system. Residential redevelopment in the form of additions or remodels may occur. The following provisions are applicable: 1. Stormwater Manual: LMC requires infiltration on site and promotes low impact development techniques. 2. SMP Buffer/Vegetation Management Requirements: SMP 17.410.020 and 021 (2) and 17.410.020 (4): New impervious surface or the addition of square footage requirements for new buildings may trigger buffers and requirements for vegetation with native species along lakefront lots if such is lacking. Vegetation management areas will also be established to protect existing...</td>
</tr>
</tbody>
</table>

---

**Comment [CB7]:** This language is suggested because core requirements in the Stormwater Design Manual for the types of residential development foreseen in Lacey’s shoreline jurisdiction may not require infiltration. This same change is suggested to later cells in this table where this language is used.
<table>
<thead>
<tr>
<th>Requirements shall apply along lakefront lots. This will promote capturing runoff. A long-time tree protection ordinance applicable throughout the City has protected overstory vegetation and the City’s tree canopy, which has significant positive impacts for drainage city-wide. It should be noted, that established uses that have contributed to the existing impacts are expected to be there over the long term and retrofitting developments will be problematic and incremental under the best of conditions.</th>
</tr>
</thead>
<tbody>
<tr>
<td>vegetation, soils, and recharge functions.</td>
</tr>
<tr>
<td>3. Wetland Protection R-Requirements of LMC 14.28 as incorporated into this SMP: Prohibit development in wetlands and buffers to maintaining the hydrologic (recharge) functions of these areas.</td>
</tr>
<tr>
<td>4. Tree Protection Ordinance LMC: 14.32: Tree retention and minimum tree requirements for each developed lot promotes retention of drainage on site throughout the City. New SMP standards for buffers and vegetation/restoration requirements shall apply along lakefront lots. This will promote capturing runoff.</td>
</tr>
<tr>
<td>4. The water quality section of the SMP (17.70) establishes a preference for LID, which will help maintain groundwater recharge and the maintenance of base flows.</td>
</tr>
<tr>
<td>5. Section 17.54 (fill and grading) limits grading/fill and resulting compaction to the minimum necessary. This will help avoid disturbing native soils where not necessary for the authorized use. Section 17.41 requires revegetation of disturbed areas, which will help maintain the hydrologic cycle and retention</td>
</tr>
<tr>
<td>owners of proper vegetation management techniques.</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>---------------</td>
</tr>
</tbody>
</table>

Exhibit C-11: Continuation of Recommended Change “App 5”
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrology: Flood flow retention.</td>
<td>Extremely Low</td>
<td>As noted above, wetland systems have been preserved providing natural storage capacity. Tree protection city wide has promoted drainage control functions as a product of Lacey’s urban forest management. Some areas of high groundwater and the potential for groundwater flooding naturally exist in Lacey.</td>
<td>Wetland systems have been preserved providing natural storage capacity. This will continue to provide a level of natural function. New drainage manual requirements will promote the concept of low impact development and will result in design of new systems expected to maintain functions that exist today.</td>
<td>The following provisions are applicable:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>City-wide tree protection and vegetation and buffer requirements for lakeshore lots will ease drainage impacts by storage and retention of stormwater onsite. There is minimal risk of overland flooding in this system because there are no rain on snow areas and it is a low gradient system.</td>
<td>1. Stormwater Manual LMC - Requires infiltration on site and promotes low impact development techniques.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2. Vegetation Management Requirements SMP 17.41.020 and .021: New impervious surface or the addition of square footage may trigger requirements for vegetation along lakefront lots if such is lacking.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3. Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibit development in wetlands, and buffers maintaining the hydrology...</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td><strong>4.</strong> Tree Protection Ordinance LMC 14.32 as incorporated into this SMP: Tree retention and minimum tree requirements for each developed lot promotes retention of drainage on site throughout the City.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>5.</strong> LMC 14.34 as incorporated into this SMP requires compensatory flood storage mitigation if structures are permitted in the floodplain.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>6.</strong> The water quality section of the SMP (17.70) establishes a preference for LID, which will help maintain the natural hydrologic cycle and retain any overland flows within the system.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>7.</strong> The SMP contains provisions for structural setbacks in Table 4, which will ensure that flood storage capacity of lakes and streams, and lakes in particular where there is high groundwater, is not diminished by encroaching structures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**hydrologic functions of these areas.**
|-------------------|------------------------------|---------------------------------------------|-----------------------------------------------------------------|------------------------|
| Sediment Generation and Transport: | Moderate | Fine sediment loading has increased due to build-up and wash-off from urban land uses. | Low  
As outlined above, new development or redevelopment that increases the intensity of existing uses is not anticipated. When new development or redevelopment does occur, new drainage manual requirements will promote the concept of low impact development and will result in design of new systems expected to maintain functions that exist today. This will eliminate the potential for new uses contributing additional flow or sediment generation from development.   
City wide tree protection and vegetation and buffer requirements for lakeshore lots will ease drainage impacts and eliminate runoff from new uses or development. Application of vegetation restoration along lakeshore lots with new permits for expansion will improve mitigation | The following provisions are applicable:   
2. SMP Buffer/Vegetation Requirements SMP-17.40.020 (2) and 17.41.020 (1): New requirements for buffers and vegetation with native species along lakefront lots.   
3. Wetland Protection Requirements of LMC 14.28: Prohibit development in wetlands and buffers maintaining the hydrologic functions of these areas.   
4. Tree Protection Ordinance LMC 14.32: Tree retention and minimum tree requirements for each developed lot promotes retention of drainage on site throughout the City. |

Comment [CB11]: This change is suggested because it appears this is non-regulatory.

Comment [CB8]: These changes are suggested to focus on the fact that there will be minimal new development or redevelopment with intensification. Therefore, the risk is low.
1. Stormwater Manual, Promotes low impact development

2. Vegetation Requirements SMP 17.41.020

3. Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP

4. Tree Protection Ordinance LMC 14.32 as incorporated into this SMP

Existing City stormwater systems are being retrofiting utilizing Best Management Practice (BMP) as part of normal maintenance and repair. Intact buffers requalize for along Woodland Creek to eliminate the potential for runoff impacts and provide area for cleansing of stormwater.

Comment [CB10]: This change is suggested because it appears this is non-regulatory.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Quality: Wetland removal of pollutants through sedimentation and adsorption.</td>
<td>Extremely – Low Protection of the large complex of wetland areas and trees under Lacey’s sensitive area ordinances has maintained this function. Some lake fringe wetlands may have been impacted in the past as development occurred, affecting this removal function at a smaller scale.</td>
<td>Extremely – Low Protection of large wetland complexes areas and trees under Lacey’s sensitive area ordinances has maintained this function in Lacey. This situation is expected to protect wetland functions over the long term. New development will be expected to protect and possibly enhance this function.</td>
<td>The following provisions are applicable: 1. Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibit development in wetlands and buffers maintaining wetland functions. 2. Chapter 17.41 of the SMP incentivizes a reduced dependency on fertilizers when Vegetation Management Plans are required. The Water Quality section of the SMP (17.70) requires minimization of fertilizer use and may even restrict it in the case of new developments requiring Codes, Covenants and Restrictions (CC and Rs) or Homeowners Associations. 3. Protection of the large wetland system with the natural designation. 4. Vegetation Management Requirements SMP 17.40.020: Vegetation management areas and landscaping along lakefront.</td>
<td>Resident Education, Wetland Protection Ordinance LMC 14.28: Protective covenants applied to HOAs informing residents adjacent to wetlands of proper vegetation and fertilization practices to protect wetland functions. Resident Education, SMP 17.41.015 (2) and (3): Educational programs and information for residents within shoreline jurisdiction regarding vegetation requirements that will promote the health of shoreline areas and promote natural functions.</td>
</tr>
</tbody>
</table>
lots will promote cleansing of stormwater before it enters the lakes.

Tree Protection Ordinance LMC

14.32: Tree protection within wetland buffer areas protects and promotes the natural functions of these wetland resources.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Quality: Delivery, movement, and loss or removal of nutrients, pathogens and toxins; storage of phosphorus and removal of nitrogen and toxins through sedimentation and adsorption.</td>
<td>High to Moderate The delivery, transport, and disposition of nutrients, pathogens and toxins have been significantly altered from the pre-disturbance condition. Upland sources of these pollutants have increased significantly as a result of urban land uses within and near the shoreline. Contaminants from adjacent residential uses, septic tanks, fertilization, etc. have contributed to water quality issues. Delivery and Potential storage has been altered decreased through the installation of impervious surfaces.</td>
<td>Moderate to Low The development of the TDML for Woodland Creek has highlighted potential sources of point-source pollution and flow reduction. Significant source control and remediation efforts are currently underway to remove and avoid pollutant discharge to the riverine environment. Significant opportunity exists to reduce septic tank drainfield contamination by sewer or corrective actions for failing septic tank systems. Little new development is anticipated; that which does occur will be addressed under the provisions outlined in the column to the right. The new SMP has an emphasis upon water quality and strategies to improve this including:</td>
<td>The following provisions are applicable: 1. <strong>Stormwater Management</strong> Promotes low impact development techniques Stormwater Manual LMC: Requires infiltration on-site and promotes low impact development techniques. 2. <strong>SMP Buffer/Vegetation Management Requirements</strong> SMP 17.40.020(2) and 17.41.020(1): New requirements for buffers and vegetation management areas with native species and landscaping along lakefront lots will promote cleansing of stormwater before it enters the lakes. 3. <strong>SMP Water Quality Standards Section</strong> 17.70.0(10): Includes sewering of shoreline areas to reduce impact from septic tanks, BMPs for stormwater management, establishment of buffers and vegetation requirements.</td>
<td>Significant opportunity exists to reduce septic tank drainfield contamination by sewer or corrective actions for failing septic tank systems.</td>
</tr>
</tbody>
</table>

Exhibit C-11: Continuation of Recommended Change “App 5”
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>2.</td>
</tr>
<tr>
<td>on new septic tank systems;</td>
<td>Requirements for lake buffers to help clean runoff;</td>
</tr>
<tr>
<td>- Requirements for vegetation cover in lake buffers;</td>
<td>- Citizen education on proper shoreline property management and use of fertilizer and potential nutrient loading activities.</td>
</tr>
<tr>
<td>4.</td>
<td>5.</td>
</tr>
<tr>
<td>Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibit development in wetlands and buffers maintaining the functions of these areas including natural cleansing action through absorption and nutrient uptake.</td>
<td>Tree Protection Ordinance LMC 14.32 as incorporated into this SMP: Tree retention and minimum tree requirements for each developed lot promotes retention and cleansing of stormwater on site throughout the City.</td>
</tr>
<tr>
<td>6.</td>
<td></td>
</tr>
<tr>
<td>Chapter 17.41 of the SMP incentivizes a reduced dependency on fertilizers when Vegetation Management Plans are required. The Water Quality section of the SMP (17.70) requires minimization of fertilizer use and may even restrict it in the case of new developments requiring Codes, Covenants and Restrictions (CC and Rs) or Homeowners Associations.</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
</tr>
<tr>
<td>Table 5 limits the amount of impervious surface on lots within shoreline jurisdiction.</td>
<td></td>
</tr>
<tr>
<td>Woodland Creek System - Woodland Creek, Long Lake, Pattison Lake, and Hicks Lake</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Process: Function Level of Existing Alteration</strong></td>
<td><strong>Potential Future Impacts and Potential Risk</strong></td>
</tr>
<tr>
<td>Habitat: Shoreline habitat for wildlife; vegetation provides structure for invertebrates, birds, amphibians, reptiles and mammals.</td>
<td>Woodland Creek – Low Native riparian vegetation has been protected under Lacey’s sensitive area requirements. The portion of the Woodland Creek corridor in Lacey retains natural riparian vegetation.</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>4.</strong></td>
<td>Vegetation management policies and standards in Section 17.41 will protect existing shoreline vegetation and habitat, and may in some cases represent an improvement in the baseline.</td>
</tr>
<tr>
<td><strong>5.</strong></td>
<td>Critical freshwater habitat regulations in Section 17.35.039 prohibit structures, uses and modifications that are not water dependent from location in these areas.</td>
</tr>
<tr>
<td><strong>6.</strong></td>
<td>Section 17.30.047 of this SMP incentivizes the removal of bulkheads when repairs or maintenance that equate to 50% of the value of such structure is necessary.</td>
</tr>
<tr>
<td>------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Habitat: Source and delivery of LWD.</td>
<td>Woodland Creek – Low Tree protection regulations in Lacey along with prohibition on tree removal within a 200 foot buffer of the creek have maintained this function. Lake Areas – Moderate to Low Tree protection regulations in Lacey along with prohibition on tree removal in designated sensitive areas along major portions of the lakes has maintained this function; note is made of the example in the picture on the front cover of the SMP. However, many developed areas in shoreline jurisdiction along the lakes consist of</td>
</tr>
</tbody>
</table>
manicured lawn and non-native landscaping, long term.
<table>
<thead>
<tr>
<th>Other Freshwater Lakes</th>
<th>Process: Function</th>
<th>Level of Existing Alteration</th>
<th>Potential Future Alteration Impacts and Potential Risk</th>
<th>Proposed Restoration/Protection Measures; Draft SMP Policies/Regulations and other Environmental Codes</th>
<th>Non-Regulatory Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrology - Groundwater recharge</td>
<td>Low Moderate Overall lake water levels have not been significantly altered, thereby allowing typical volumes of groundwater discharge. The basins around Lacey’s freshwater lakes are developed at urban densities and are characterized by moderate percentages of impervious surface. In addition, water levels in Chambers Lake are managed, which may reduce groundwater recharge through reducing retention time in the lake basin.</td>
<td>Low</td>
<td>See discussion above under Woodland Creek and Lacey’s main lakes; little development is anticipated within shoreline jurisdiction on these lakes because they are built out. Any development would represent a very small scale change in the basin. Development outside of shoreline jurisdiction will also affect groundwater recharge in the lake basins.</td>
<td>The following provisions are applicable: 1. Stormwater Manual - LMC: Requires infiltration on site and promotes low impact development techniques providing groundwater recharge. 2. SMP Buffer Vegetation Management Area Requirements, SMP 17.40.020 (2) and 17.41.020 and .021(1): New requirements for buffers and vegetation with Protection and installation of native species along lakefront lots may facilitate groundwater recharge by slowing runoff. 3. Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibit development in wetlands and buffers maintaining the hydrologic functions of these areas. 4. Tree Protection Ordinance LMC</td>
<td></td>
</tr>
</tbody>
</table>
|   |   | 14.32 as incorporated into this SMP: Tree retention and minimum tree requirements for each developed lot promotes retention of drainage on site throughout the City.  
5. Section 17.54 (fill and grading) limits grading/fill and resulting compaction to the minimum necessary. This will help avoid disturbing native soils where not necessary for the authorized use. Section 17.41 requires revegetation of disturbed areas, which will help maintain the hydrologic cycle and retention time in the Woodland Creek system.  
6. Table 5 limits the amount of impervious surface on lots within shoreline jurisdiction. | This will encourage onsite retention and infiltration leading to more natural recharge. |
|------------------------|-------------------|-----------------------------|-----------------------------------------------------|---------------------------------------------------------------------------------|--------------------------|
| Hydrology: Flood flow retention. | Low Moderate | As noted above, lake volumes and water levels are generally similar to pre-disturbance conditions. Chambers Lake and Southwick Lake do not have inlets, so function less to provide overland flood flow retention although they do capture surface water runoff. Water levels in Chambers Lake are actively managed for flood control. | Low See discussion above under Woodland Creek and Lacey’s main lakes regarding lack of anticipated development, and fact that without inlets, the primary risk of flooding in these lakes will be from expressions of high groundwater. | The following provisions are applicable:  
2. Vegetation Management Requirements SMP 17.41.020 and .021: New impervious surface or the addition of square footage may trigger requirements for vegetation along lakefront lots if such is lacking.  
3. Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibit development in wetlands and buffers maintaining the hydrologic functions of these areas.  
4. Tree Protection Ordinance LMC 14.32 as incorporated into this SMP: Tree retention and minimum tree requirements for each developed lot promotes retention of drainage on site. | |
throughout the City.

5. LMC 14.34 as incorporated into this SMP requires compensatory flood storage mitigation if structures are permitted in the floodplain.

6. The water quality section of the SMP (17.70) establishes a preference for LID, which will help maintain the natural hydrologic cycle and retain any overland flows within the system.

7. The SMP contains provisions for structural setbacks in Table 4, which will ensure that flood storage capacity of lakes and streams, and lakes in particular where there is high groundwater, is not diminished by encroaching structures.

Stormwater Manual - LMC:
- Requires infiltration on site and promotes low impact development techniques.

2. SMP Buffer/Vegetation
- Requirements SMP 17.40.020- (2) and 17.41.020 (1); New requirements for buffers and vegetation with native species along lakefront lots.

3. Wetland Protection
- Requirements of LMC 14.28—Prohibit development in.
|   |   |   | wetlands and buffers maintaining  
|   |   |   | the hydrologic functions of these  
|   |   |   | areas.  
| 4. | Tree Protection Ordinance LMC  
|   |   |   | 14.32 – Tree retention and  
|   |   |   | minimum tree  
|   |   |   | requirements for each  
|   |   |   | developed lot promotes  
|   |   |   | retention of drainage on site.  
<p>|   |   |   | throughout the City. |</p>
<table>
<thead>
<tr>
<th>Other Freshwater Lakes</th>
<th>Process: Function</th>
<th>Level of Existing Alteration</th>
<th>Potential FutureAlteration Impacts and Potential Risk</th>
<th>Proposed Restoration/Protection Measures; Draft SMP Policies/Regulations and other Environmental Codes</th>
<th>Non-Regulatory Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sediment Generation and Transport: Upland sediment generation.</td>
<td>Moderate to High Anthropogenic fine sediment loading to the lakes has increased as a result of build-up and wash off of sediments from impervious surfaces.</td>
<td>Low Implementation and retrofit of water quality BMPs to the existing stormwater systems can reduce fine sediment loading. Little if any development is anticipated within these shoreline reaches. If new development or redevelopment does occur, the standards in the column to the right will apply.</td>
<td>The following provisions are applicable: 1. Stormwater Manual LMC: Requires infiltration on site and promotes low impact development techniques. 2. SMP Buffer/Vegetation Management Area Requirements in the SMP, 17.40.020 (2) and 17.41.020 and .021(4): New requirements for buffers and vegetation with native species, vegetation management areas, protecting riparian and lakefront lots will help trap sediment that is generated on uplands. 3. Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibits development in wetlands and buffers maintaining the hydrologic functions of these areas. 4. Tree Protection Ordinance LMC 14.32 as incorporated into this SMP: Tree retention and minimum Best Management Practice (BMP) Applied to Retrofits for Existing Drainage Systems: Implementation and retrofit of water quality BMPs to the existing stormwater systems can reduce fine sediment loading.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
5. Sections 17.54.020 and 17.70.010 of the SMP require that material movement and erosion/sedimentation be prevented, minimized and controlled during and after construction.

6. Various sections of the SMP and LMC require that any disturbed areas not subsequently built upon be replanted with native vegetation.

5. Best Management Practice (BMP) Applied to Retrofits for Existing Drainage Systems—Implementation and retrofit of water quality BMPs to the existing stormwater systems can reduce the sediment loading.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Quality: Lake trophic status/overall water quality.</td>
<td>High</td>
<td>Low</td>
<td>The new SMP has an emphasis upon water quality and strategies to improve this including: &lt;ul&gt; &lt;li&gt;Phase out and prohibition on new septic tank systems;&lt;/li&gt; &lt;li&gt;Requirements for buffers to help clean runoff;&lt;/li&gt; &lt;li&gt;Requirements for vegetation cover in buffers;&lt;/li&gt; &lt;li&gt;Citizen education on proper shoreline property management and use of fertilizer and potential nutrient loading activities. These SMP requirements as well as new drainage standards are expected to result in an incremental improvement in water quality over the long term.&lt;/li&gt; &lt;/ul&gt;</td>
<td>The following provisions are applicable: &lt;ul&gt; &lt;li&gt;&lt;strong&gt;Stormwater Manual:&lt;/strong&gt; Promotes low impact development techniques.&lt;/li&gt; &lt;li&gt;&lt;strong&gt;Vegetation Management Area Requirements in the SMP, 17.41.020 and .021:&lt;/strong&gt; Vegetation management areas and landscaping along lakefront lots will help keep pollutants generated on uplands from entering water bodies.&lt;/li&gt; &lt;li&gt;&lt;strong&gt;Wetland Protection Requirements of LMC 14.28 as incorporated into this SMP: Prohibits development in wetlands maintaining the hydrologic functions of these areas.&lt;/li&gt; &lt;li&gt;&lt;strong&gt;Tree Protection Ordinance LMC 14.32 as incorporated into this SMP: Tree retention and minimum tree requirements for each developed lot promotes.&lt;/strong&gt;&lt;/li&gt; &lt;/ul&gt;</td>
</tr>
</tbody>
</table>

Comment [CB14]: This deletion is suggested because this column is where likelihood for loss of function should be discussed. The new SMP is the next column to the right.
upland land uses to influence lake water quality.

<table>
<thead>
<tr>
<th>Term</th>
<th>Little if any development is anticipated within these shoreline reaches. If new development or redevelopment does occur, the standards in the column to the right will apply.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>retention of drainage on site throughout the City. Stormwater Manual - LMC: Requires infiltration on site and promotes low impact development techniques.</td>
</tr>
<tr>
<td>2. SMP Buffer/Vegetation Requirements SMP 17.40.020 (2) and 17.41.020 (1): New requirements for buffers and vegetation with native species along lakefront lots.</td>
<td></td>
</tr>
<tr>
<td>53. SMP Water Quality Standards 17.70.010: Includes sewering of shoreline areas to reduce impact from septic tanks and, BMPs for stormwater management, establishment of buffers and vegetation requirements.</td>
<td></td>
</tr>
<tr>
<td>6. Chapter 17.41 of the SMP incentivizes a reduced dependency on fertilizers when Vegetation Management Plans are required. The Water Quality section of the SMP (17.70), requires minimization of fertilizer use and may even restrict it in the case of new developments requiring Codes, Covenants and Restrictions (CC and Rs) or Homeowners Associations.</td>
<td></td>
</tr>
<tr>
<td>4. Wetland Protection Requirements of LMC 14.28: Prohibit development in wetlands and buffers maintaining the</td>
<td></td>
</tr>
<tr>
<td>Functions of these areas including: natural cleansing action through absorption and nutrient uptake.</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Tree Protection Ordinance LMC 14.32: Tree retention and minimum tree requirements for each developed lot promotes retention of drainage on site throughout the City.</td>
<td></td>
</tr>
</tbody>
</table>
III. Proposed Regulations

An evaluation of the proposed update policies and regulations in the Shoreline Master Program above shows that it will maintain ecological function at existing levels and may have beneficial effects on the level of shoreline to promote no net loss of ecological function. In addition to the details above in Tables 3-5, the following are some of the major elements:

A. New Shorelines: Regulated under SMP

The following shorelines are proposed to be added to shoreline jurisdiction based on meeting the criteria:

- A portion of Woodlake Creek starting just north of Martin Way.

B. Environmental Designations

Environmental designations in the proposed Shoreline Master Program are based upon the inventory and characterization report and identified ecological functions and values. With implementation of this SMP, all of Lacey’s reaches will have designations as a new and enhanced protection strategy designed to achieve no net loss of function or value for these important resources. New designs are discussed highlighted below.

Natural:

- The Natural designations are being applied to those areas with wetlands that are currently designated Open Space Institutional (OSI) in Lacey’s zoning code. It should be noted that the OSI zone has rigorous standards prohibiting development within designated sensitive areas. It has been used by Lacey for nearly two decades to protect and preserve sensitive areas like wetlands.

The designation of OSI zoned areas as Natural compliments the emphasis on protection and preservation Lacey’s GMA Plan and zoning code has required for these areas. This designation is a long overdue improvement to the SMP that will finally bring its environmental protection requirements for sensitive areas into consistency with Lacey’s existing GMA Plans and implementing environmental legislation.

The Natural designation is also being applied to all of Lacey’s marine shoreline, with the exception of portions of Mallard Cove that have been developed and used for a private marina since the late 1940s. The Planning Commission determined that portion of Mallard Cove used for a marina does not meet the classification criteria for a Natural designation given its existing development and long term use as a marina.

Of note here is that the environmentally sensitive estuary with significant ecological function and value that wraps around the Beachcrest marina in Mallard Cove has remained untouched and retains its same form it had before establishment of the marina nearly 60 years ago. This area was included in the Natural designation.

Exhibit C-11: Continuation of Recommended Change "App 5"
Shoreline along the Beachcrest development within the unincorporated UGA was excluded from the Natural designation for similar reasons as the marina. It has experienced extensive development with permanent modification of its natural functions.

Those areas that meet the classification criteria for the Natural designation and have been assigned this designation include:

- The wetland systems linking Hicks, Long, and Pattison Lake and Woodland Creek.
- That portion of Woodland Creek north of Martin Way north to the previous shoreline jurisdiction boundary.
- All of the Nequally Reach shoreline within the incorporated Lacey city limits with the exception of the area occupied by the Beachcrest private marina in Mallard Cove.

Urban- Conservancy:

The Urban Conservancy designation has been applied to areas within the City and in the UGA where development can be compatible with maintaining or restoring ecological function. This designation is intended to protect and allow for the restoration of open spaces, floodplains and other sensitive lands where they exist in urban and developed settings.

All existing Conservancy designations that were not changed to a Natural designation have migrated to the new Urban Conservancy designation. A The Urban Conservancy designation is proposed to be retained has been applied to undeveloped properties with wetlands and no shoreline modifications, at the north end of Long Lake. This area is within unincorporated Thurston County and is not subject to the SMP. This designation has been applied to portions of Woodland Creek without extensive wetlands but where development has occurred, and along the south end of Chambers Lake where there are extensive wetland resources. It has also been applied around Southwick Lake, which is relatively undeveloped compared to the other lakes in the vicinity and has extensive areas of wetland, as well as to the west shoreline of Hicks Lake where densities are low and wetlands exist. This designation will provide protection for ecological function where some development has occurred and will continue to occur but where sensitive resources exist and require protection.

Shoreline Residential:

The Shoreline Residential designation replaced the previous residential designations. These Shoreline areas designated under this Shoreline Residential classification meet the criteria outlined for this designation and can generally be described as urbanized with typical low density residential impacts to ecological function resulting from human disturbance.

Impacts have typically included removal of a portion of the native vegetation, construction of residential structures, impervious surfacing with associated stormwater concerns, installation of septic tank drain field systems for areas without sewer with associated impacts to water quality, and modifications permitted under the old SMP such as bulkheads, docks and floats.

While much of the lakeshore areas are urbanized and have experienced impacts to the shoreline’s natural function and values, it should be noted that urbanization of Lacey’s lake
areas has generally been less intense than that experienced by adjacent jurisdictions with similar lake shoreline resources. However, there are few critical or sensitive areas and the shorelines are predominantly built out. The Shoreline Residential designation will serve to protect functions that may occur in these shoreline areas, while providing flexibility to accommodate residential development where development has traditionally occurred and where services and infrastructure or plans for infrastructure (sewer) can support residential development.

Several factors play into the particular style and character of urbanization we find along Lacey’s lakefront lots. In addition to having preserved all of the associated wetland and floodplain areas as described above under the discussion of areas being designated Natural, Lacey has also had long standing environmental legislation for the protection of trees which has included trees on lakefront lots.

In Lacey, lakefront areas have also been designated under Lacey’s most restrictive residential classification of LD 0-4 and a comparable shoreline designation promoting larger urban lot sizes. Historically, under these classifications, subdivisions along lakefronts have had lot sizes of a generous proportion considering standards of today, exceeding a quarter of an acre or more.

While the larger lots have an aesthetic appeal, historically, the lot size was often in necessity of accommodating onsite septic tank and drain fields. This is considered the most damaging
consequence of existing residential development along Lacey’s lakes. Many old drain fields are located within 25 feet of the adjacent water body. This is expected to have contributed to the nutrient loading of local lakes and associated water quality issues.

Tree protection in Lacey is another factor in the quality of Lacey’s shoreline lots. Tree-protection in Lacey dates back into the 1970s. Tree protection has resulted in larger lots maintaining indigenous evergreen trees such as Douglas Fir throughout the City and including lakefront lots. This provides some appearance of naturalized shorelines even with residential development having occurred on the majority of the shoreline. An example of this is the picture on the front cover of this SMP. From across Hales Lake (the only lake exclusively in Lacey and subject to Lacey’s jurisdiction) the lake views are more of tree-canopy than residential development.

Being heavily treed provides a good start for enhanced vegetation and buffering this residential designation will require as one strategy to achieve no net loss of existing function and value.

**BC. Residential Setbacks**

In Lacey, proposed residential setbacks have increased in all reaches, see Table 6. In addition, the updated SMP establishes buffers within designated setback areas and has native vegetation requirements for the buffers.

Setbacks are used in association with complementary vegetation management areas and residential design standards that are expected to achieve objectives described in the SMP. Setbacks are proportionate to the need identified by the environment designation. They provide area to accommodate buffers where necessary to protect habitat functions, help mitigate pollution from.

The increase in residential setbacks is a major strategy to protect identified functions and values of our shoreline resources. Setbacks are used in association with complementary buffers and residential design standards that are expected to achieve objectives described in the SMP. Setbacks are proportionate to the need identified in the environment designation. They provide area to accommodate buffers that protect habitat functions, help mitigate.

AS-32
stormwater problems runoff and provide area for vegetation management that supports these functions. In addition, design requirements will be applied to development that requires layout of land divisions to design with nature to make protective modifications unnecessary. In Lacey, residential remodels and additions will be by far the most common development occurring in shoreline jurisdiction. The vast majority of lakefront lots are developed, and there are no commercial or industrial uses on Lacey’s shorelines.

In summary, these changes are expected to have the following effects:

- New homes will be placed further back from the shoreline and “designed with nature.” Although there are very few undeveloped lots in Lacey’s shoreline areas, this may apply if smaller waterfront homes are torn down to be replaced with new, larger structures. This means the design does not work against nature but with it. Design must show respect and protect identified natural processes and functions. This negates the need for protective structures like bulkheads to prevent erosion. Instead design allows the natural processes to occur.

- Existing structures within the setback will be labeled “expansion, nonconforming limited.” While they can still be altered, such as adding an addition, an increase in the degree of nonconformity will not be allowed maintaining the distance to accommodate some buffer area and the mitigation sequence will ensure that additions or expansions result in no net loss of ecological function.

- The setback will provide an area to practice protective vegetation management within the buffer area, with the benefits discussed below.

CD Shoreline Vegetation Landscaping and Restoration

The proposed update to the Shoreline Master Program includes new requirements for vegetation conservation. Existing vegetation must be retained and maintained, and planting will be required if there are direct impacts from development to vegetation or where needed to mitigate indirect impacts. The idea is to incrementally restore shorelines with native vegetation as shoreline properties develop or redevelop.

Vegetation management The proposed new standards apply to all uses and development in shoreline jurisdiction. New vegetation may be required on parcels with waterfront access when:

- A new structure is constructed.

- Increases in impervious surfaces increase.

- An existing structure is remodeled and square footage is added.

- An accessory structure (such as a garage, deck, or patio) is added.
- Any development action requiring a shoreline permit is taken.

In order to move toward the goal of restoring native vegetation to shorelines incrementally, the proposal—the SMP includes a sliding scale for how much vegetation, mitigation and restoration is required proportionate to the impact of the project triggering the permit.

New structures, additions to existing structures or accessory structures will all require compliance with landscaping provisions. To address proportionality, tiers of requirements ranging from minor to major are displayed in Please see Table 1 of Section 17.41.021 of this SMP and are duplicated here for convenience as Table 7.
TABLE 7: SLIDING SCALE FOR VEGETATION REQUIREMENTS.

Guideline for Shoreline Vegetation Improvements Intended to Achieve Landscaping and Restoration
Enhancement goals Comparable to Illustrated/Photographic Examples Provided in Appendix 2

Landscaping, Re-vegetation and Restoration Improvement Guidelines

1. Table 7 is considered a guideline for improvements with specific standards for
threshold of development and performance:

The following table is referred to as guidelines because use of vegetation management
for mitigation and restoration may involve a myriad of activities and landscaping
designs that can meet public objectives. However, the following table should be
considered the benchmark for performance and the thresholds provided for level of
improvements shall be considered specific standards when preparing a Vegetation
Management Plan and developing mitigation/restoration strategies.

2. Expectations for focus of Vegetation Management Plan:

While a Vegetation Management Plan may not be the only requirement to meet
objectives of no net loss, it will typically be a major component when dealing with
improvements on individual lots. As such, it should have an emphasis on use and
management of vegetation to achieve mitigation/restoration objectives of this SMP.
This will include the following:

A. No net loss of function and value related to the proposed expansion;

B. Mitigation/restoration to address impacts currently present from existing use of the
property.

3. Expectations for mitigation and restoration:

A. Mitigation is required for all new impacts attributed to expansion activities to meet
no net loss requirements. This may also include restoration activity where
mitigation options fall short of achieving objectives of no net loss.

B. Mitigation/restoration to address existing impacts is designed to be proportionate to
the level of expansion and identified existing impacts. This is intended to provide a
fair and equitable way of improving the health of the shoreline incrementally over the
long term as properties develop and redevelop. This strategy also allows choice of
toolbox strategies that meet the landowner’s/applicant’s needs and personal
objectives.

4. When both a Vegetation and Habitat Management Plan are required:

If the property involves a critical area with a requirement for a Habitat Management Plan,
the Vegetation Management Plan and its necessary components can typically be
consolidated as part of the Habitat Management Plan.
# Landscaping, Re-vegetation and Restoration Improvement Guidelines

<table>
<thead>
<tr>
<th>Level of Expansion/Action</th>
<th>Type of Requirement Applied</th>
<th>Description of Improvement Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor permit—Permit associated with residential structure and no expansion; Electrical; Expansion with no increase in impervious surface (vertical)</td>
<td>No landscaping requirement.</td>
<td>No landscaping, mitigation or restoration requirement.</td>
</tr>
<tr>
<td>Minor expansion—Expansion of building footprint by up to 500 square feet or up to 10% of structure (whichever is less) Or Expansion of impervious surface by more than 1,000 square feet, or between 10.1 to 25% (whichever is less)</td>
<td>Comply with Tree and Tier One (Basic landscaping) requirements</td>
<td>— Basic Tree Requirements: Meet minimum tree requirements of Chapter 11.32. Minimum number of required trees must be placed within buffer area between shoreline and structure.</td>
</tr>
<tr>
<td>Moderate expansion—Expansion of the building footprint by more than 500 square feet or between 10.1 to 25% (whichever is less) Or Expansion of impervious surface by more than 1,000 square feet, or between 10.1 to 25% (whichever is less)</td>
<td></td>
<td>— Comply with Tier Two Mitigation/restoration vegetative requirements</td>
</tr>
<tr>
<td>Major expansion of a non-conforming use and structure or all new construction—Expansion of existing structures</td>
<td>Full compliance required with development standards. Applies to all structures including but not limited to existing structures</td>
<td>Jurr Four Requirements—Vegetation of a native community for full 100% of the area within the buffer between the shoreline and structure.</td>
</tr>
</tbody>
</table>
structures involving more than 25% of the square footage of the existing structure, or all new construction on an undeveloped lot.

Or

Expansion of a nonconforming structure—
Nonconforming structures will only be permitted to expand if the expansion will not adversely impact the public interest in shorelines and the expansion comes with some aspect to provide a better ecological or community benefit.

In some cases this may be accomplished through mitigation of identified impacts and provision of additional vegetation, removal of accessory nonconforming structures or providing special value to the public, such as provision of a shoreline public access.

- Compliance with vegetation requirements for the applicable category of expansion identified in this chart related to level of expansion.
- Additional mitigation and restoration in the amount of 10% based upon the non-conforming aspect and policies and standards of Sections 17.40, 17.41 and 17.42.
- Structure and Use Requirements:
  - Remove over water structures that do not provide public access or do not serve a water dependent use
  - Piers and docks are required to replace any solid surfaces with light penetrating surfacing material.

Compliance with Table One—Two or Three requirements as applicable, with an additional 10% as a nonconforming use expansion.

- Requirements may vary according to the following considerations:
  - A nonconforming structure, or a residence designated conforming limited expansion, will follow the same basic guidelines shown in the table, but will be required to have a threshold for improvements at 10% of the project cost and will include special mitigation conditions related to specific public interests impacted.
  - Where a property has been fully landscaped with qualifying vegetation and meets all other requirements of the SMP no additional landscaping will be required.
  - Credit will be given for participation in weed control provided the property also practices landscaping strategies that do not contribute to weed growth. Credit will be proportionate to the investment made in weed control and the relative priority that should be given to weed control considering the existing condition of property being developed; restoration funding must follow the adopted priorities.
  - Material should be from approved landscaping varieties or approved alternatives. For trees,
select from the Lacey General Tree List in Lacey’s Urban Forest Management Plan or a comparable tree listed in Appendix 2. For shrub and ground cover types, select from Appendix 2. Alternative varieties may be approved by the City Arborist.
D. Other Shoreline Development Actions

Other development actions that require review under the SMP a shoreline permit, such as new docks or bulkheads, will require meeting shoreline vegetation standards. In order to encourage removal of hard armored bulkheads and replacement to with soft shorelines, development that boosts leading to an increase in restoration of shoreline ecological function by removing hard structures can quality for reduced vegetative mitigation vegetation requirements proportionate to the environmental benefit expected. In addition, lots where an existing buffer or qualified vegetation exists can be considered exempt from additional vegetative requirements.

All uses and development within shoreline jurisdiction are required to adhere to the mitigation sequence in Section 17.40.000 of this SMP.

E. Docks and Piers

Docks and piers have been permitted permissible on all many lakes, and where these shorelines are already currently altered. Under the proposed regulations, altered shorelines are assigned an environmental designation of Shoreline Residential and in some cases Urban Conservancy or High Intensity, depending on the nature of the upland alteration.

In the Shoreline Residential designation, docks and piers that are shared between two or more adjacent land owners) will require a less stringent permitting process than docks that only support one home. This is to encourage fewer docks on the shorelines for ecological, navigational, and aesthetic reasons. The key is creating a balance between alterations to the shoreline and protecting ecological functions. Docks and piers will be limited to the size necessary, and will be granted as they are replaced to allow for light penetration.

E. Bulkheads, Shoreline Stabilization and Other Modifications

Bulkheads to protect single family residences from damage from erosion are still allowed, provided this is the only method of stabilization that will prevent loss and that the risk is not a result of management of upland issues. The intent is to encourage shoreline bank stabilization with non-structural alternatives where it is feasible.

Normal maintenance and repair to shoreline modifications has traditionally been allowed under a shoreline exemption. However, the treatment of exemptions is also designed to incentivize create incremental improvements in shoreline function over the long term by building in a transition from old modifications to newer more preferred methods as the need for maintenance increases and older structures need to be replaced. Modifications are will still be authorized under allowed an exemption for normal repair and maintenance until the if the value of the maintenance or repair cost is less than exceeds a threshold of 50% of the cost value of replacement replacement new structure. If the 50% threshold is exceeded, at this point the repair becomes defined as replacement and will requires a conditional use permit. The CUP process will necessarily require an analysis of the need and environmentally sensitive alternatives that can may result meet in the same protection objectives.
This process is expected to improve the overall functions of the lake ecology over the long term by a continual evaluation of existing modifications as they require major repair efforts and the requirement for moving to acceptable more naturalized concepts for beach stabilization.

As a general requirement, mitigation sequencing is required for all modifications to ensure it is needed, there are no other alternatives to achieve the intended objective and mitigation is applied to ensure no net loss.
The CUP process is also used as a process of review for unidentified uses that might be proposed. This process gives Lacey the flexibility to review unforeseen uses and activities and apply appropriate conditions to ensure no net loss or deny the use if necessary.

Other Goals for Shoreline Use

The updated SMP includes sections or provisions that address the full range of public use and interest of shoreline resources. This includes such topics as recreation, access, navigation, historical and archeological, scientific and educational. Each of these uses has particular needs related to design and location for functionality. Each also has particular demands on shoreline areas. At the same time, each reach of shoreline has specific functions and values with particular needs for protection. Generally a reach is not compatible with every use and careful attention is needed to successfully match a reach with a category of uses it can successfully accommodate without impact to its natural processes and functions.

The SMP addresses the status, function and values associated with each shoreline reach and the types of use that are appropriate considering its specific needs for protection. The protection needs of a reach will generally be reflected by the reaches’ environmental designation.

In addition, the SMP identifies the public use and interest needs associated with shoreline resources such as recreation and navigation, and specific conditions necessary for each use to be successfully integrated into the shoreline without a net loss of the shoreline functions and value.

Of particular note is public access. A whole new public access plan has been developed as Appendix 1 of the SMP. This plan identifies public interest and need for shoreline areas, identifies existing public access opportunities and provides an analysis of unmet need. The plan also identifies specific sites likely to develop and specific strategies for providing public access to the benefit of developing properties and future residents as well as the public at large. The plan outlines specific steps and processes Lacey will implement to achieve these objectives. These include both regulatory and incentive tools.

Finally, specific standards related to the functionality of the use and protection of the shoreline natural processes and functions are provided. The plan is expected to be a guidepost for Lacey’s public access efforts that will balance public need for access with shoreline protection strategies. The plan will help Lacey define and achieve public access goals with no net loss of shoreline resources, functions or values over the long term.

Similar methodology was used for other uses by creating separate sections in the SMP dealing with specific topic areas. These sections provide a goal and policy basis for the use/activity and a set of standards to ensure functionality of the use and no net loss of ecological function or value for the shoreline resources; see Part 3 of the SMP.
IV. Foreseeable Development in Shoreline Environments

In addition to the information in tables 5-8, the following foreseeable types of development listed in Tables 8-10 (Foreseeable Development of Shorelines) have been derived from the following sources:

- Anticipated population forecasts developed as a function of work required under the state Growth Management Act (GMA).
- Buildable land studies accomplished as a requirement of GMA analyzing the probability distribution of population forecasts, given vacant land resources available to the City.
  - Goals and policies of the Comprehensive Land Use Plan prepared under GMA.
  - Local Capital Facilities Plan.
  - Comprehensive Plan for Outdoor Recreation.
  - Thurston Regional Trails Plan.
  - Known development plans for shoreline parcels.
  - Past trends in development.
- Planning Commission discussion, including real estate, Master Builders and other members of the development community related to trends, development expectations and market issues.
### TABLE 8: FORESEEABLE DEVELOPMENT FOR SHORELINES – MARINE REACHES.

<table>
<thead>
<tr>
<th>Marine Reach</th>
<th>Proposed Designation</th>
<th>Foreseeable Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIS-1 Butterball Cove &amp; Jubilee Beach</td>
<td>Natural</td>
<td>None anticipated. The only improvements we might expect in this area would be City improvement of the existing historic pier in association with public access. Any project associated with this structure would require compliance with goals of the City Comprehensive Plan for Outdoor Recreation, the City Restoration Plan and requirements for no net loss.</td>
</tr>
<tr>
<td>NIS-2A Mallard Cove, mini-marina</td>
<td>Natural for estuary south of marina; <a href="#">Urban Conservancy</a> for shoreline in marina</td>
<td>Bulkhead repairs and replacement at the marina. Lacey will apply mitigation to ensure no net loss conditions to any replacement of a modification in this area. In addition, incentives are being offered for efforts to upgrade existing modifications with improved naturalized concepts or preferred options. Residential repairs and remodels are also expected in the upland Beachcrest development. This area is under jurisdiction of Thurston County.</td>
</tr>
<tr>
<td>NIS-2B Beachcrest</td>
<td><a href="#">Urban Conservancy</a></td>
<td></td>
</tr>
</tbody>
</table>
TABLE 9: FORESEEABLE DEVELOPMENT FOR SHORELINES – RIVERS AND STREAMS.

<table>
<thead>
<tr>
<th>River/Stream Reach</th>
<th>Proposed Designation</th>
<th>Existing Designation</th>
<th>Foreseeable Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>WOODLAND CREEK</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WOOD-1A</td>
<td>Natural</td>
<td>Conservancy</td>
<td>Interstate 5 widening project (State)</td>
</tr>
<tr>
<td>WOOD-1B</td>
<td>Urban Conservancy</td>
<td>Conservancy</td>
<td>Interstate 5 widening project (State) Draham Road widening and improvement project (Thurston County) Residential repairs and remodels</td>
</tr>
<tr>
<td>WOOD-2</td>
<td>Natural</td>
<td>Conservancy</td>
<td>None anticipated Pleasant Glade Park is located along Woodland Creek in this reach; however plans for the park are not final and the Action program in the Parks Plan indicates that development of the park(s) would not occur until the land is annexed into the City.</td>
</tr>
</tbody>
</table>
### TABLE 10: FORESEEABLE DEVELOPMENT FOR SHORELINES – LAKES.

<table>
<thead>
<tr>
<th>Lake Reach</th>
<th>Proposed Designation</th>
<th>Existing Designation</th>
<th>Foreseeable Development</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CHAMBERS LAKE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CHAM-1A NE Basin (Lcy)</td>
<td>Shoreline Residential</td>
<td>Urban</td>
<td>Residential repairs and remodels</td>
</tr>
<tr>
<td>CHAM-1B SE Basin (Lcy)</td>
<td>Urban Conservancy</td>
<td>Conservancy</td>
<td>None anticipated</td>
</tr>
<tr>
<td>CHAM-2 South (Olv/Lacey)</td>
<td>Urban Conservancy</td>
<td>Conservancy</td>
<td>Recreation/park development including trails, trailheads, parking</td>
</tr>
<tr>
<td>CHAM-3 W Basin (Lcy)</td>
<td>Shoreline Residential</td>
<td>Urban</td>
<td>Residential repairs and remodels Possibly some residential vacant buildable lots</td>
</tr>
<tr>
<td><strong>HICKS LAKE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HICKS-1</td>
<td>Natural</td>
<td>Conservancy</td>
<td>Potential water line connection around 37&lt;sup&gt;th&lt;/sup&gt; to 33&lt;sup&gt;rd&lt;/sup&gt; Avenues</td>
</tr>
<tr>
<td>HICKS-2A</td>
<td>Urban Conservancy</td>
<td>Urban</td>
<td>Residential repairs and remodels Recreation/park activities</td>
</tr>
<tr>
<td>HICKS-2B</td>
<td>Shoreline Residential</td>
<td>Urban</td>
<td>Residential repairs and remodels</td>
</tr>
<tr>
<td><strong>LONG LAKE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LONG-1</td>
<td>Shoreline Residential</td>
<td>Rural</td>
<td>Residential repairs and remodels</td>
</tr>
<tr>
<td>LONG-2</td>
<td>Shoreline Residential</td>
<td>Rural</td>
<td>Residential repairs and remodels</td>
</tr>
<tr>
<td>LONG-3A</td>
<td>Natural</td>
<td>Conservancy</td>
<td>None anticipated</td>
</tr>
<tr>
<td>LONG-3B</td>
<td>Shoreline Residential</td>
<td>Conservancy</td>
<td>None anticipated</td>
</tr>
<tr>
<td>LONG-3C</td>
<td>Natural</td>
<td>Conservancy</td>
<td>None anticipated</td>
</tr>
<tr>
<td>LONG-4</td>
<td>Shoreline Residential</td>
<td>Rural</td>
<td>Residential repairs and remodels</td>
</tr>
<tr>
<td>LONG-5</td>
<td>Shoreline Residential</td>
<td>Rural</td>
<td>Residential repairs and remodels</td>
</tr>
</tbody>
</table>

**Comment [CB18]:** It is suggested that reaches 1, 2 and 3B be deleted, because they are not relevant to Lacey or its UGA.
<table>
<thead>
<tr>
<th>LONG-6</th>
<th>Urban Conservancy</th>
<th>Conservancy 14th Avenue extension/connection to Union Mills Road (City of Lacey and Thurston County).</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>In 2005 the Long Lake Retirement Cottages project was approved in this reach, consisting of 45 residential lots and associated improvements. A 50 foot shoreline setback was applied to the residential structures and portions of the access road, community clubhouse and parking area would be located within the shoreline setback. A dock with a pergola is proposed along the shoreline, and 30 feet of the 50 foot buffer along the shoreline is proposed for enhancement where such would not conflict with proposed improvements. Due to the time that has passed since this project was approved (permit expirations) and current economic conditions, it does not appear likely that this project will be built.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>According to the Action Program in the Parks Plan, at the time the rail line in this reach is abandoned (currently used by BNSF) the City will seek to extend the Woodland Trail east through this reach. Woodland Creek Community Park may also expand or add facilities such as trail connections, parking, etc. Residents have requested the City review the suitability of the site for an off-leash dog park.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PATTISON LAKE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PAT-1</td>
<td>Shoreline Residential</td>
<td>Rural Mullen Road widening project (Thurston County)</td>
</tr>
<tr>
<td></td>
<td>Residential repairs and remodels</td>
<td>A landowner along this reach has discussed remodeling his multifamily apartment building with the City; however, no concrete plans are known and no official application has been received.</td>
</tr>
<tr>
<td>Lake Reach</td>
<td>Proposed Designation</td>
<td>Existing Designation</td>
</tr>
<tr>
<td>------------</td>
<td>----------------------</td>
<td>----------------------</td>
</tr>
</tbody>
</table>
| PAT-2      | Shoreline Residential| Rural                | Residential repairs and remodels  
|            |                      |                      | Possibly some residential vacant buildable lots |
| PAT-3A     | Natural             | Conservancy          | None anticipated        |
| PAT-3B     | Shoreline Residential| Rural                | Residential repairs and remodels  
|            |                      |                      | Possibly some residential vacant buildable lots |
| PAT-4A     | Shoreline Residential| Rural                | Residential repairs and remodels |
| PAT-4B     | Natural             | Conservancy          | None anticipated        |
| PAT-4C     | Shoreline Residential| Rural                | Residential repairs and remodels |

**SOUTHWICK LAKE**

<table>
<thead>
<tr>
<th>SOUTH-1</th>
<th>Urban Conservancy</th>
<th>Urban Conservancy</th>
<th>Residential repairs and remodels</th>
</tr>
</thead>
</table>

A property owner at the SE corner of the lake has requested annexation into the City. It is anticipated that if annexation is approved, an application for residential development will be submitted. The site is encumbered by wetlands and development potential is limited.

**Comment [CB19]:** It is suggested that reaches 1, 2 and 3B be deleted, because they are not relevant to Lacey or its UGA.
V. Summary Assessment of Cumulative Impacts

AC. Marine Reaches

1. Nisqually Reach

   Along Nisqually Reach and within the urban growth area, little development or redevelopment is expected. In general, ecological functions will improve through:
   - Restoration projects such as the culvert replacement in Ellis Cove.
   - Designation of properties meeting qualifying criteria as Natural under the environment designation for shoreline areas.
   - Application of buffers and vegetation management standards supporting each environmental designation’s specific needs and when sensitive areas are present.
   - Requiring soft armoring as opposed to bulkheads where it can obtain achieve the same objectives, and only where it can be demonstrated that it is necessary to protect an existing structure.
   - Stormwater management in uplands.
   - Continuation of tree protection strategies of Lacey’s Urban Forest Management Plan in upland areas.

BD. Rivers and Streams

1. Woodland Creek

   Very little development is anticipated along this shoreline. It is expected that there will be general improvement of ecological function through the following:
   - Stormwater management in uplands.
   - Prohibiting development in riparian buffer areas.
   - Avoidance, minimization, and revegetation of shoreline if redevelopment occurs and/or results in impacts.
   - Prohibiting Dealing with existing new development on septic tanks drainfield systems.

CE. Lakes

   It is anticipated that there will be general improvement in the ecological function of the lakes for the following reasons:
   - Critical wetland systems linking lakes in the Woodland Creek system will have
increased protected by application of the Natural designation in addition to the wetland protection ordinance.

- There are very few undeveloped single-family residential lake shoreline lots in Lacey. If any lots do develop, new development or redevelopment will be designed, located and constructed placed to avoid impacts to vegetation, further back from the shoreline and therefore will not require a and avoid the need for bulkheads or other modifications for protection. Shoreline vegetation will be conserved and or-replanting will also may be required.
• New standards for **buffers and vegetation management areas management** are expected to slowly improve the existing situation.

• Any new residential redevelopment, replacement or expansion will have to meet the same requirements for a vegetation plan and proper vegetation management.

• New residential land divisions with five or more new lots may include a wide range of design and form to best integrate with the shoreline environment and meet development objectives. This is expected to include specific conditions for each individual land division necessary to best meet the concept of no net loss and achieve other community objectives.

• Residential setbacks have generally increased and this is expected to result in better buffering. More buffer area with more vegetation can provide enhanced habitat and more effective drainage treatment.

• Any development actions requiring a shoreline permit will require vegetation of the buffer area proportionate to the action. This will result in incremental improvement across the full range of activity expected within shorelines jurisdiction.

• Stormwater management according to the new drainage manual requirements is expected to improve stormwater runoff impacts from upland areas **through encouraging low impact development**. This should continue to improve water quality issues associated with stormwater runoff.

---

• Prohibiting new development on septic tanks.

As sewer service is extended to the growth area, hookup of homes currently served by aging septic tank systems should reduce potential impacts to groundwater and water quality impacts to the drainage basin and associated water bodies.

Comment [CB21]: These three bullets are recommended for deletion because they basically repeat the third bullet.

Comment [CB22]: This is suggested for deletion because the intent is captured with the above bullet. In addition, this is not in the SMP (the SMP does not require existing homes to hook up to sewer).
VI. Summary

When considering current conditions, the regulatory framework, and the foreseeable development along shorelines, it is anticipated that there will be no net loss of ecological function under the proposed Shoreline Master Program for Lacey. Shoreline ecological functions and conditions are expected to make a general improvement, as a result of both the proposed regulations, and other regulations such as those pertaining to stormwater management, wetland protection and tree protection in the upland areas. Other policies, such as extending sewer service to urbanized areas on septic tank drainfields should also have a positive effect on shoreline functions and conditions.
VII. Resources

City of Lacey, 2008. Lacey Comprehensive Plan, (including Capital Facilities Chapter).

City of Tumwater, 2008. Tumwater Comprehensive Plan (including Capital Facilities Chapter).

City of Tumwater, 2007. City of Tumwater Parks, Recreation and Open Space Plan, Draft.

Thurston Regional Planning Council, 2008. Draft Shoreline Inventory for the Cities of Lacey, Olympia, and Tumwater and their UGAs.


Port of Olympia website—http://www.portolympia.com/

Thurston County, 2008. Thurston County Comprehensive Plan (including Capital Facilities Chapter).