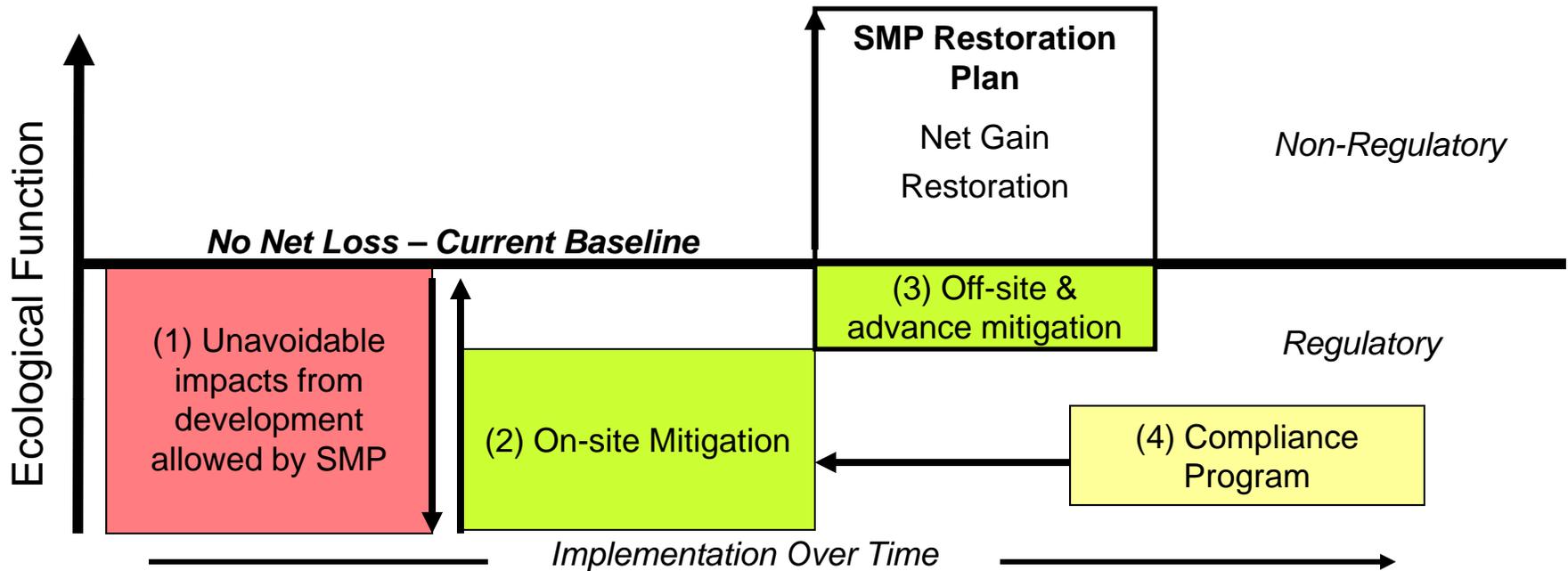


Achieving No Net Loss of Ecological Function at the Permit Level



(1) Development impacts from projects and exempt development regulated by the SMP, after minimization measures. SMP should require appropriate setbacks, buffers, density, etc. standards, and encourage use of innovative measures such as clustering, TDR's, site specific BMP's, etc. to reduce impact.

(2 and 3) On-site mitigation and Off-site/Advance Mitigation. SMP should include a framework for off-site mitigation, laying out the conditions when it will be allowed or preferred. Innovative techniques such as wetland banking need to be included in mitigation frameworks for SMPs. SMP Restoration Plans should help identify priority sites/types of sites for the most effective off-site restoration activities. *For wetlands, it has been clearly documented that traditional on-site restoration is not achieving mitigation of impacts. We need to get more creative in our approaches here.*

(4) SMP Compliance Program should be included in the updated SMP. The compliance program should include routine inspection of mitigation projects, and a strategy identifying priorities for enforcement to improve protection of the most significant shoreline features and functions.