



Thurston County Government

Shoreline Master Program

Review of Select Proposed Shoreline Environment Designations (SEDs)

Andrew Deffobis, Interim Senior Planner

2 March 2022





Overview

- County received requests to review select proposed SED during public hearing comment period
 - PC previously provided links to all comments
- Requests, staff analysis/recommendations will be reviewed tonight & during upcoming PC work sessions
- PC may revise proposed SEDs consistent with designation criteria
- Tonight: Long Lake, Nisqually Reach, Eld Inlet



Shoreline Environment Designations Background



- All jurisdictions must assign SEDs to shoreline; process is informed by Inventory & Characterization
- SEDs control allowed uses, permit and development standards
- SED report created earlier in SMP update process
 - Natural SED proposed for more intact shorelines
 - Shoreline Residential SED proposed for more impacted shorelines
 - Rural Conservancy/Urban Conservancy SED proposed for additional shorelines
 - Aquatic SED used below the Ordinary High Water Mark (OHWM)





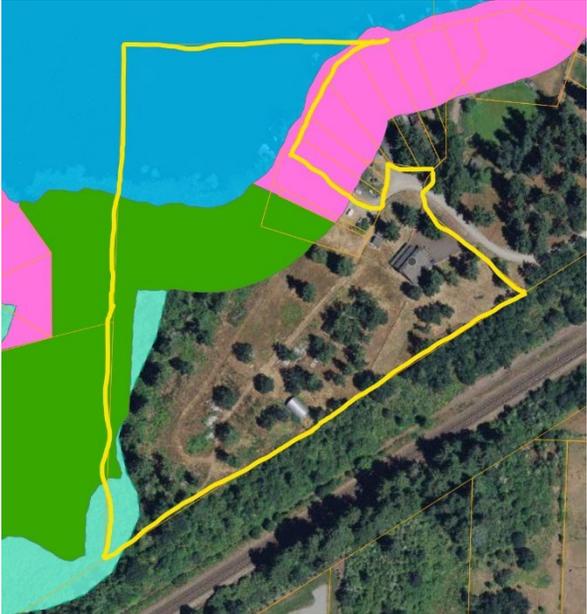
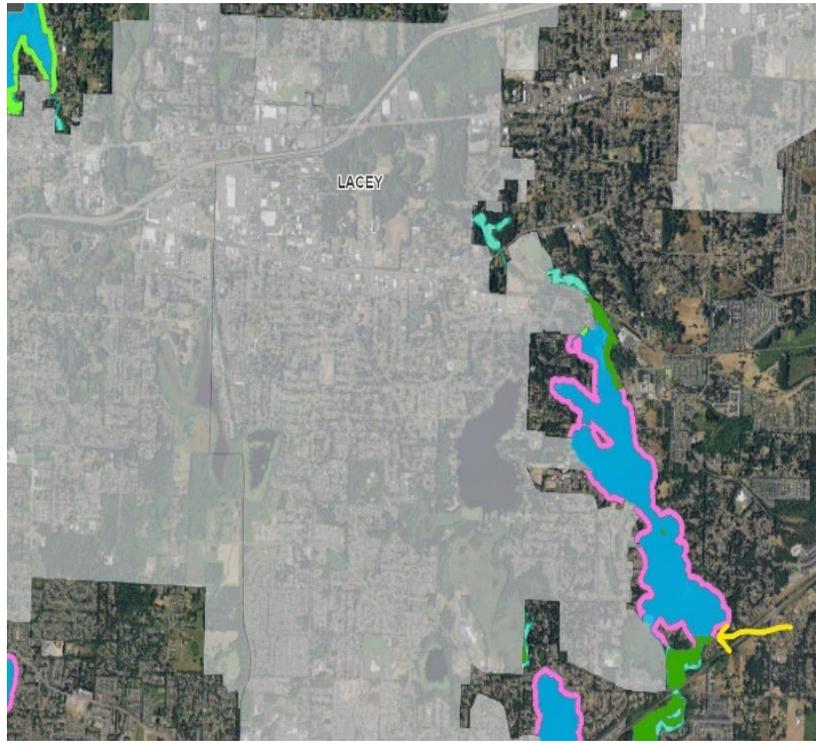
Please keep in mind...

- Analyses are based on criteria in SED report
- Reaches may not fit neatly in one SED box; may meet criteria of more than one SED
- SEDs are one component to ensure no net loss of ecological function
- SMP jurisdiction is confirmed in the field
- SED is not the only factor that affects shoreline development



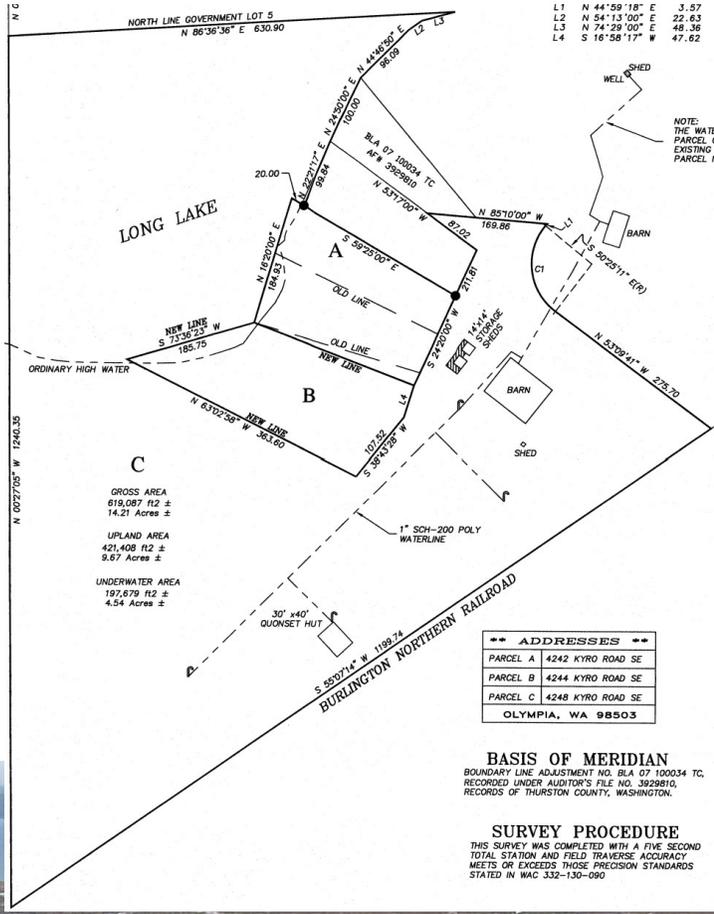
LL0-4—LL0-5/LL0-5—LL0-6 (Kyro Rd.)

- The 3 parcels in question occur along the LL0-5 reach break
- BLA has been recently performed
- Current SED: Rural & Conservancy
- Proposed SED: Shoreline Residential & Natural
- Citizen Request: Shoreline Residential (Comment Letter 272)





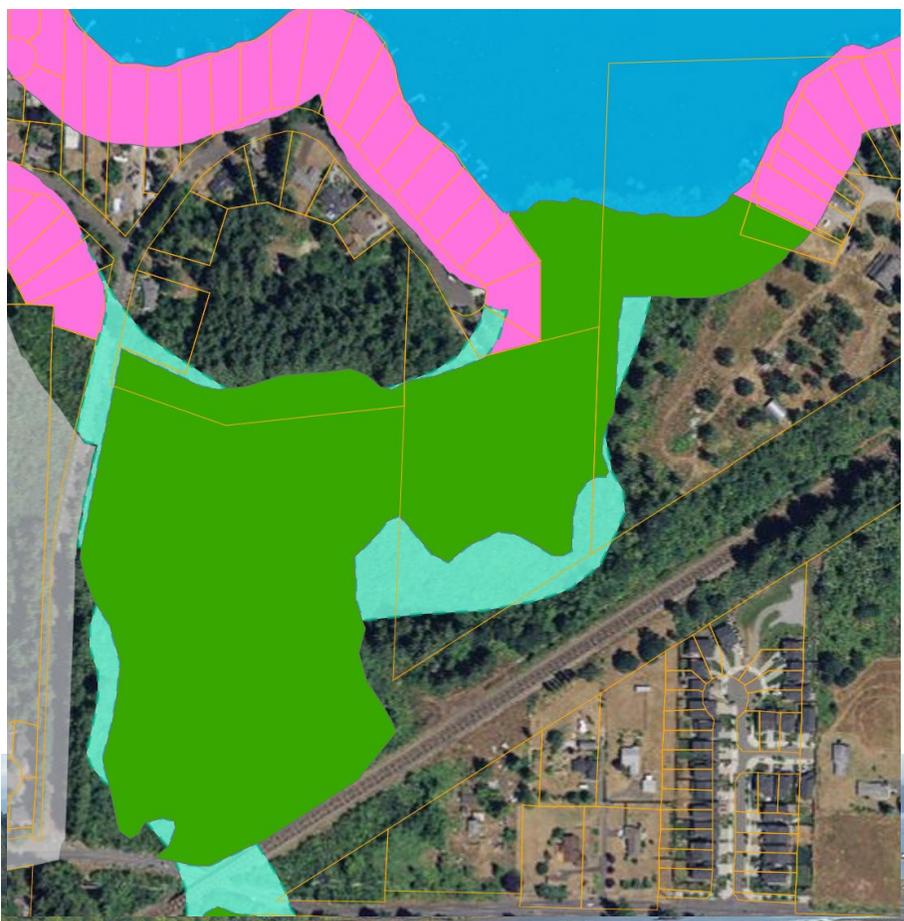
LL0-4-5, LLO-5-6 (Kyro Rd.)



Left: extent of subject area, highlighted in yellow

Right: Boundary line adjustment map showing new parcel configuration

Reach LLO-5—LLO-6

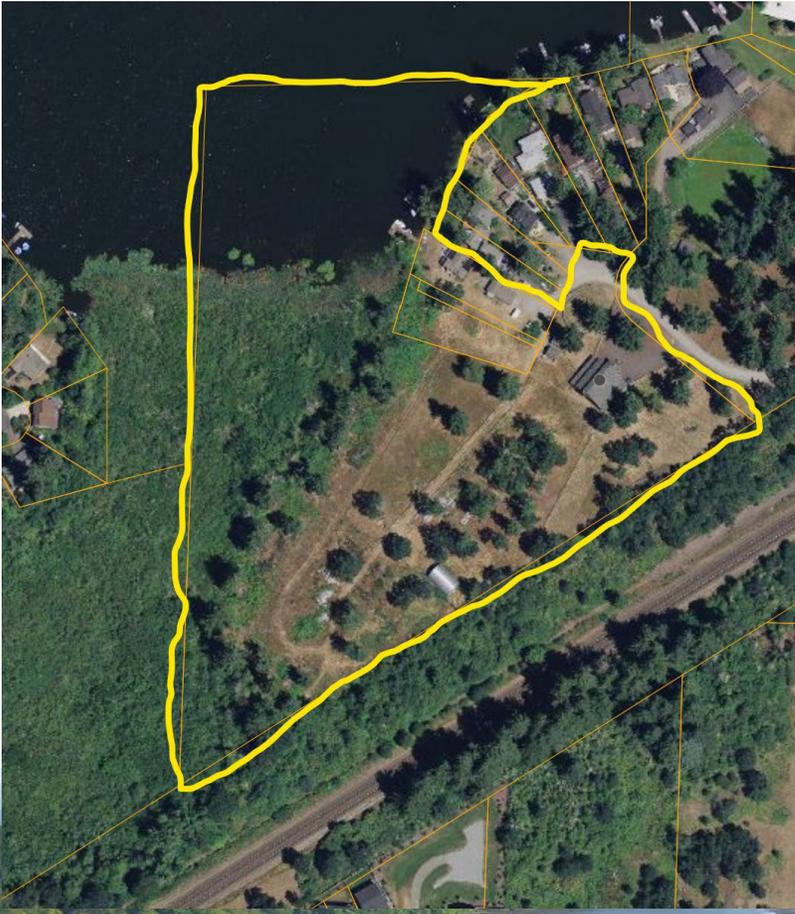


Left: Reach LLO-5—LLO-6 general depiction, proposed Natural SED

Right: Reach LLO-5—LLO-6 general depiction, aerial photograph



Kyro Rd. Parcels vs. Natural Criteria



<p>Natural</p>	<p>Protect those shoreline areas that are relatively free of human influence, and/or that include intact or minimally degraded shoreline functions intolerant of human use. Only very low intensity uses are allowed in order to maintain the ecological functions and ecosystem-wide processes.</p>	<ul style="list-style-type: none"> • Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity. • Considered to represent ecosystems and geologic types that are of particular scientific and educational interest • Unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety. • Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats. • Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation. • Generally free of structural shoreline modifications, structures, and intensive human uses.
-----------------------	--	---

Kyro Rd. Parcels (LLO-5—LLO-6) vs. Natural Criteria



SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity.	<p>SED report notes this criteria for this reach.</p> <p>I&C states “Within the associated wetlands, riparian vegetation is still intact.”</p>	<p>WAC 173-26-211(5)(a)(iii)(C) discusses the term ‘ecologically intact’. Aerial photos (2009-2012) appear to show removal of vegetation in a portion of the shorelands of Lot B/wetland buffer of Lot C, which begins to grow back in more recent photographs. Majority of reach does not appear to have been altered in the recent past, per aerial photographs. The entire reach appears to be free of structural shoreline modifications, structures, and intensive uses (other than the aforementioned clearing). A ditch may have been cut through the wetland to aid flow from Pattison Lake into Long Lake. The wetlands appear vegetated, though the composition of that vegetation has not been confirmed. The reach is bordered by a road and railroad. Majority of reach appears closer to “intact” than “totally degraded”.</p>
Considered to represent ecosystems and geologic types that are of particular scientific and educational interest	None noted	
Unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.	SED report notes this criteria for this reach.	Majority of reach appears to be intact and has not been altered in the recent past. Development could result in significant impacts in these areas. Some shoreland clearing is visible on Lots B & C (c. 2009-2012), and a portion remain cleared. These areas may be providing a lower degree of ecological function.
Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats.	SED report notes this criteria for this reach.	Wetlands and riparian vegetation can be observed in this reach. The majority of the reach appears to be largely undisturbed.
Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation.	SED report notes this criteria for this reach.	A portion of the shorelands along Long Lake have been converted to lawn/pasture/grass (4244 Kyro Rd.). The majority of this reach contains wetland and upland vegetation, though a site visit has not been conducted to determine the degree of native vegetation. Staff have not seen evidence to suggest shoreline configuration has been altered.
Generally free of structural shoreline modifications, structures, and intensive human uses.	SED report notes this criteria for this reach. I&C analysis matrix notes 0 piers, docks, armoring in this reach.	As a whole, this reach is largely free of structural shoreline modifications, structures, and intensive human uses. (One dock is observed on a portion of 4242 Kyro Rd. that is outside Reach LLO-5—LLO-6). Reach is bordered by road and railroad.

Kyro Rd. Parcels vs. Urban Conservancy Criteria



<p>Protect and restore ecological functions of open space, floodplain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses.</p>	<ul style="list-style-type: none"> • Appropriate and planned for development that is compatible with maintaining or restoring of the ecological functions of the area, that lie in incorporated municipalities, urban growth areas, or commercial or industrial rural areas of more intense development AND at least one of the following: • Suitable for low-intensity water-dependent, water-related or water-enjoyment uses without significant adverse impacts to shoreline functions or processes • Open space, flood plain, or other sensitive areas that should not be more intensively developed
	<ul style="list-style-type: none"> • Potential for ecological restoration • Retain important ecological functions, even though partially developed • Potential for development that is compatible with ecological restoration • Does not meet the designation criteria for the Natural environment.

Kyro Rd. Parcels vs. Urban Conservancy Criteria



SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
<p>Appropriate and planned for development compatible with maintaining or restoring ecological functions of the area, that lie in incorporated municipalities, urban growth areas, or commercial or industrial rural areas of more intense development AND at least one of the following:</p>		<p>The subject area is within the Lacey urban growth area. Majority of reach is not appropriate for development based on critical area and floodplain regulations.</p>
<p>Suitable for low-intensity water-dependent, water-related or water-enjoyment uses without significant adverse impacts to shoreline functions or processes</p>		<p>Such uses may be the most appropriate uses for wetlands and their buffers. Development impacts will be limited based on presence of wetlands and floodplain.</p>
<p>Open space, flood plain, or other sensitive areas that should not be more intensively developed</p>		<p>The majority of this reach is mapped wetland and floodplain. Development is restricted in these areas by critical area and flood regulations.</p>
<p>Potential for ecological restoration</p>	<p>I&C matrix: TCGDRS, 2007 ranked wetland sites 247, 249 and 167 a range of low to high environmental benefits. Riparian site 19 was ranked low for environmental benefit</p>	
<p>Retain important ecological functions, even though partially developed</p>		<p>TCGDRS, 2007 ranked wetlands in this reach as providing moderate benefit, and relatively high for ecological processes. Other parameters noted "at risk".</p>
<p>Potential for development that is compatible with ecological restoration</p>		<p>Development in much of this reach would be limited based on critical area protections.</p>
<p>Does not meet the designation criteria for the Natural environment.</p>		<p>Much of this reach does meet the criteria for the Natural environment.</p>

Kyro Rd. Parcels vs. Shoreline Residential Criteria



<p>Shoreline Residential</p>	<p>To accommodate residential development and appurtenant structures and provide appropriate public access and recreational uses in areas where medium and high density residential developments and services exist or are planned.</p>	<ul style="list-style-type: none"> • Does not meet the criteria for the Natural or Rural Conservancy Environments. • Predominantly single-family or multifamily residential development or are planned and platted for residential development. • Majority of the lot area is within the shoreline jurisdiction. • Ecological functions have been impacted by more intense modification and use.
-------------------------------------	---	--





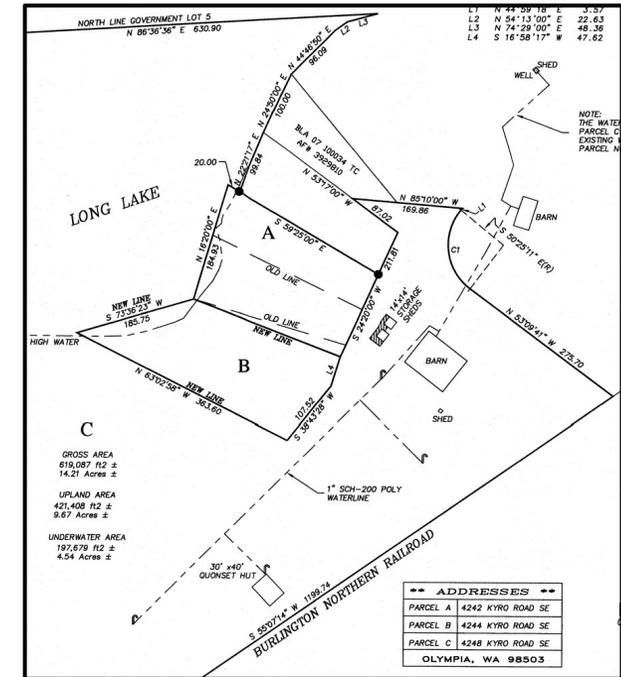
Kyro Rd. Parcels vs. Shoreline Residential Criteria

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Lot A does not appear to meet the criteria for these designations. The other parcels meet some criteria of Natural SED, as does rest of reach.
Predominantly single-family or multifamily residential development or are planned and platted for residential development.		Lot A contains residential development. Lot B is a 0.85 acre lot with area outside shoreline jurisdiction, and is adjacent to other residential lots, some also +/-1 acre in size. Lot C does not appear to contain residential structures and is over 14 acres in size. Area is zoned Lower Density Residential 0-4 units/acre.
Majority of the lot area is within the shoreline jurisdiction.		This is hard to estimate given that the mapping layer has not been updated since the boundary line adjustment, and GIS parcel shift occurs around lakes. The majority of Lot A appears to be within shoreline jurisdiction, and a portion of this lot is proposed to be Shoreline Residential. There is less clarity for the other lots. Staff notes the size of Lot C. Even if a majority of the lot is in shoreline jurisdiction, a significant area remains outside shoreline jurisdiction on this parcel.
Ecological functions have been impacted by more intense modification and use.		Within the shorelands of Lot B/wetland buffer of Lot C, vegetation has been removed, and cleared area maintained. The shoreline does not appear to be armored. There is one dock on Lot A in area already proposed Shoreline Residential, along with a single-family home and garage. The portion of Lot C within shoreline jurisdiction does not appear to have been significantly modified.



Staff Findings (Kyro Rd. Parcels)

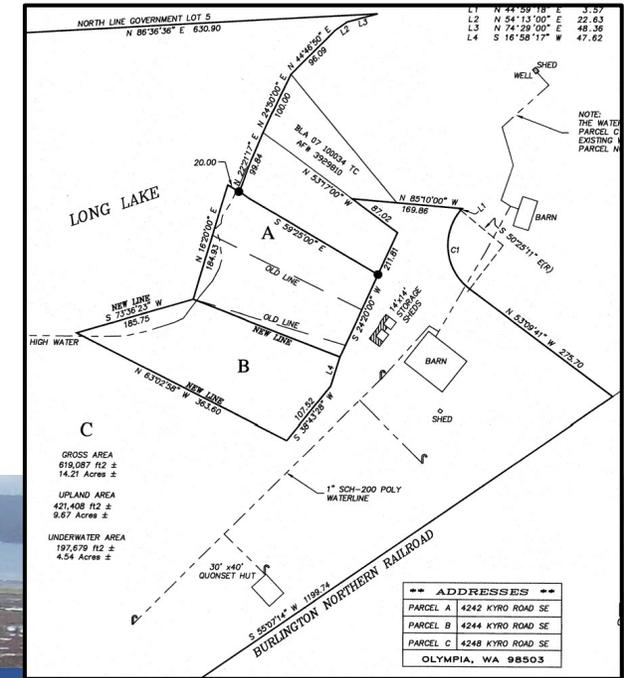
- Portion of area meets criteria for Shoreline Residential – reach break shift can address this
- Gradient of conditions across site, from more developed to more intact
- Area is portion of larger wetland complex that comprises majority of Reach LLO-5—LLO-6
- Lots B & C appear to have buildable area outside SMP jurisdiction, other regulations will apply





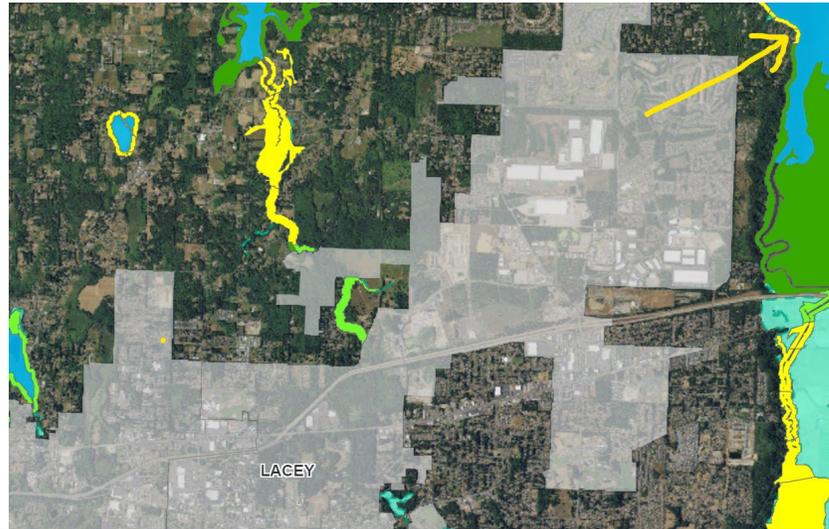
Staff Recommendations (Kyro Rd. Parcels)

- 4242 Kyro Rd. (Lot A): Extend Reach LLO-4—LLO-5 to include this entire parcel, provide Shoreline Residential SED
- 4244 Kyro Rd. (Lot B): Shoreline Residential may be appropriate, given proximity to similar, developed lots
- 4248 Kyro Rd. (Lot C): Retain Natural SED – area within wetland appears largely intact, unmodified, connected to larger wetland feature

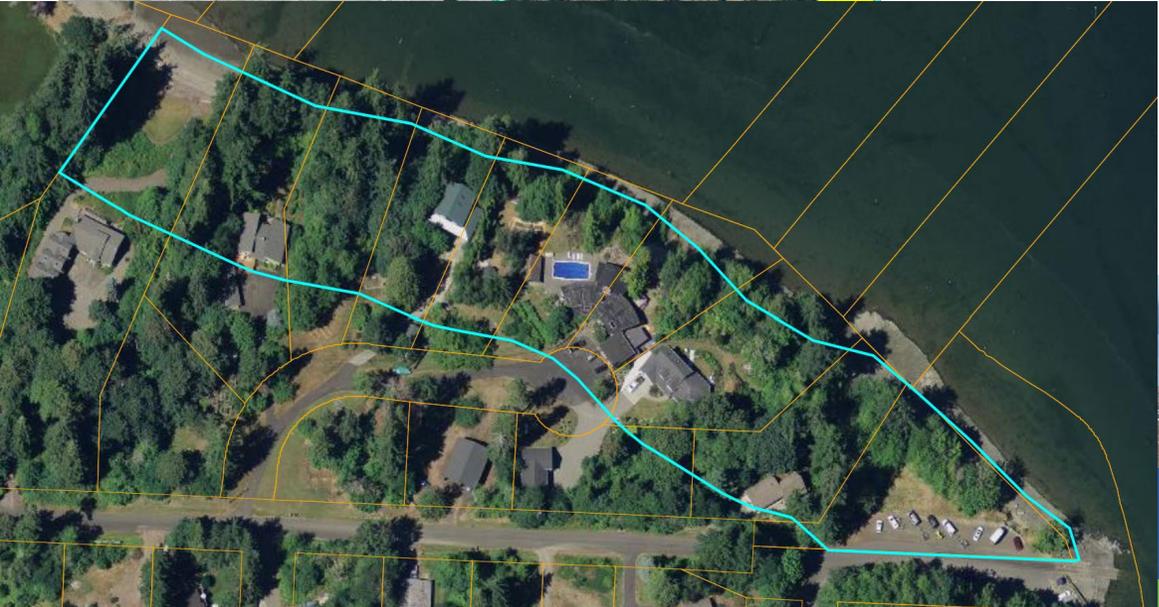




Nisqually Reach (MNI-21—MNI-22)



- Current SED: Rural
- Proposed SED: Rural Conservancy
- Citizen Request: Shoreline Residential





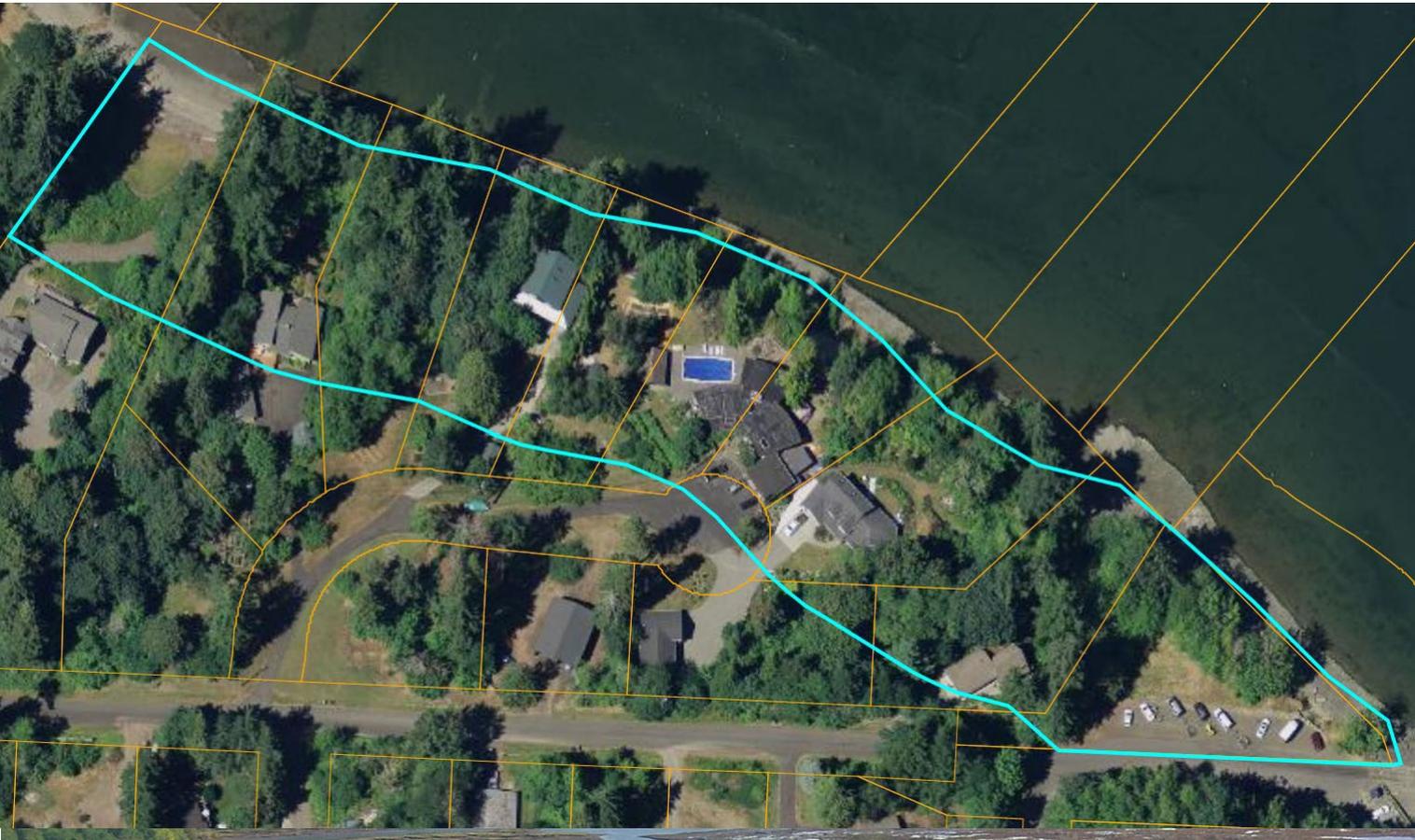
Nisqually Reach Issues Raised

- SMP Public Comment Letter 196
- Commenter states reach matches Shoreline Residential criteria as developed





Nisqually Reach vs. Rural Conservancy Criteria



Provide for sustained resource use, public access, and recreational opportunities while protecting ecological functions, and conserving existing ecological, historical, and cultural resources,

- Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:
- Currently supporting low-intensity resource-based uses such as agriculture, forestry, or recreation.
- Currently accommodating residential uses
- Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas
- Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes
- Private and/or publically owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.
- Does not meet the designation criteria for the Natural environment.





Nisqually Reach vs. Rural Conservancy Criteria

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:	SED report uses this criteria to support Rural Conservancy SED for this reach.	Yes – this area is outside incorporated municipalities and UGAs.
Currently supporting low-intensity resource based uses such as agriculture, forestry, or recreation.		To some extent. There is a boat launch parking area at the eastern end of this reach. Also, the citizen requesting the re-designation indicates that there is aquaculture occurring in this reach. Staff observed some evidence of aquaculture operations offshore in 2019 aerial photos.
Currently accommodating residential uses	SED report uses this criteria to support Rural Conservancy SED for this reach. I&C matrix: Most of the shoreline exhibits fragmented forest cover adjacent to residential use plots.	Yes, all lots appear to have residential development except for WDFW owned parcel.
Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas	SED report uses this criteria to support Rural Conservancy SED for this reach. SED report/I&C matrix list unstable slopes, steep slopes, potential landslide areas, past landslides. I&C matrix states “moderate bluff height” for this reach.	Yes. All parcels are mapped with steep slopes. Homes are mainly at 40-60’ above sea level. Ecology’s Coastal Atlas maps this area as a feeder bluff. A non-jurisdictional stream or drainage appears to drain into Puget Sound mid-reach.
Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes	SED report: Prioritized low for forage fish habitat preservation/restoration. I&C states this reach is sand beach. From I&C report (excerpts): Nisqually Reach marine shoreline provides habitat for geoduck, Dungeness crab, and forage fish including smelt, sand lance, rock sole, and herring. The marine shoreline also provides habitat for bald eagle, blue heron and waterfowl concentrations. Southern Nisqually Reach is mapped as containing patchy eelgrass.	Low-intensity uses may be more appropriate given the degree of existing vegetation and potential feeder bluff presence. Steep slopes may limit new development. Development on beaches would need to account for impacts to achieve no net loss to functions such as forage fish/other habitat and sediment transport.
Private and/or publicly owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.	From I&C matrix: Public access within the reach: Nisqually Habitat Management Area owned by DFW with known public access	Yes, in parts of reach. Majority of reach does not appear to contain substantial public access potential. However, east end of reach is used for recreation and is adjacent to a WDFW boat launch. Entirety of Puget Sound is of cultural significance to area tribes.
Does not meet the designation criteria for the Natural environment.		This reach does not appear to meet the designation criteria for the Natural SED.

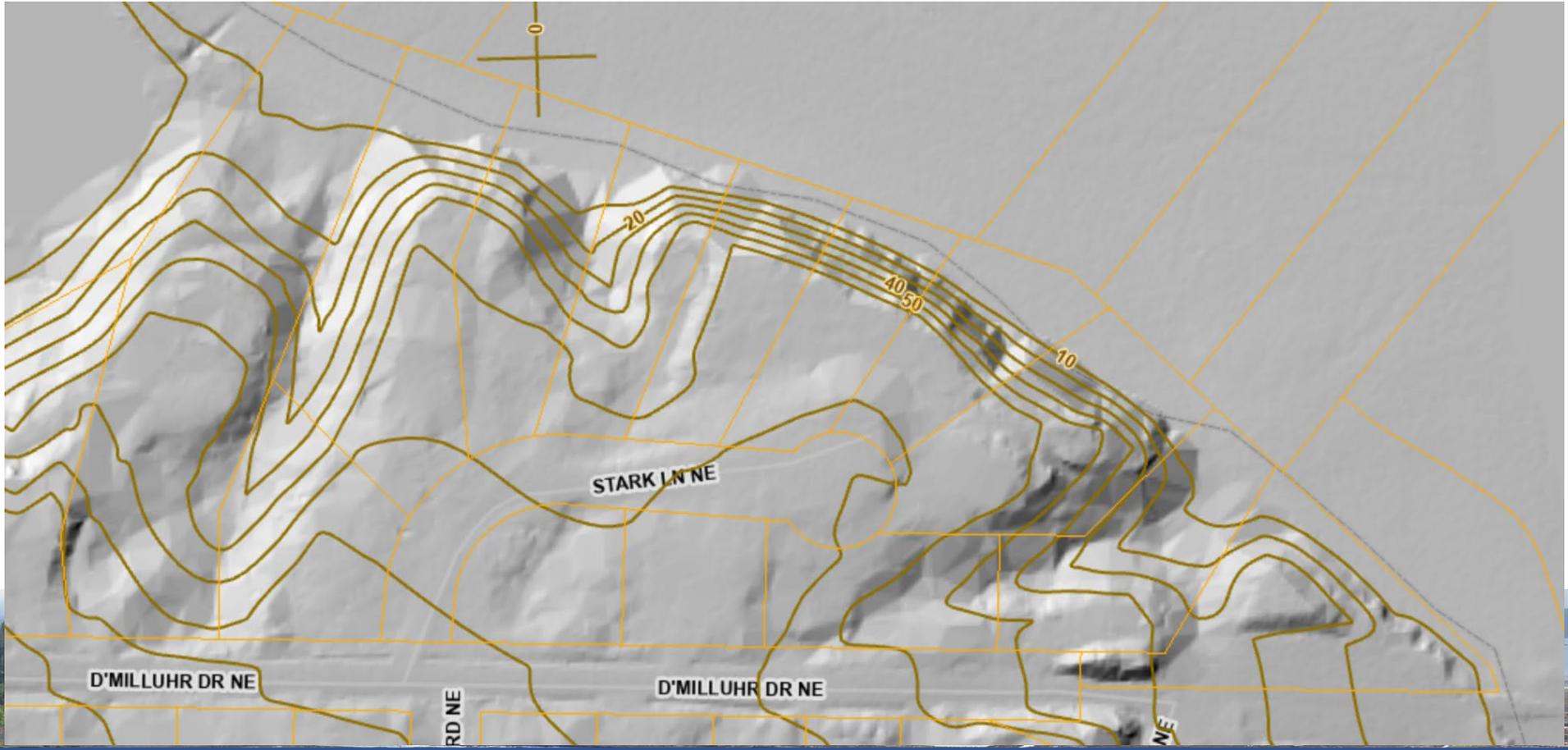


Shoreline
www.Thu



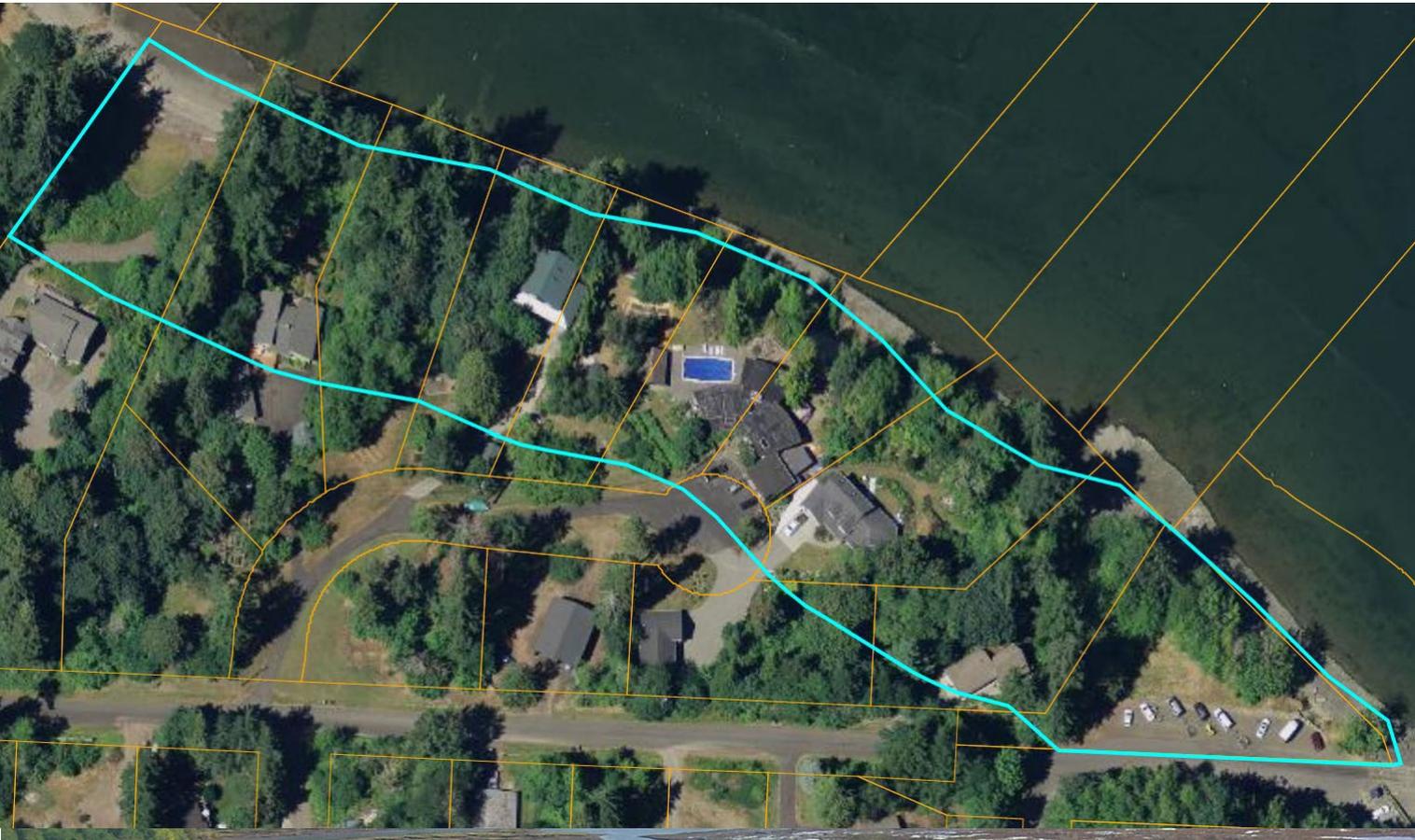


Nisqually Reach – Topo Map





Nisqually Reach vs. Shoreline Residential Criteria



To accommodate residential development and appurtenant structures and provide appropriate public access and recreational uses in areas where medium and high density residential developments and services exist or are planned.

- Does not meet the criteria for the Natural or Rural Conservancy Environments.
- Predominantly single-family or multifamily residential development or are planned and platted for residential development.
- Majority of the lot area is within the shoreline jurisdiction.
- Ecological functions have been impacted by more intense modification and use.





Nisqually Reach vs. Shoreline Residential Criteria

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Does not meet the criteria for Natural. Yes, does meet several Rural Conservancy criteria.
Predominantly single-family or multifamily residential development or are planned and platted for residential development.	From I&C: Nisqually Reach south to Nisqually Head contains low density residential development with associated impervious surfaces.	Yes. This reach has LAMIRD zoning (R1/2). All lots appear to contain residential development except one parcel. Most primary residential structures appear more than 50 ft from mapped boundary of Puget Sound. Several are within 125 feet. However: This is not the OHWM.
Majority of the lot area is within the shoreline jurisdiction.		Yes. This appears to be the case for the vast majority of lots.
Ecological functions have been impacted by more intense modification and use.	<p>SED report: Prioritized low for forage fish habitat preservation/restoration. Bulkheads mid-reach.</p> <p>From I&C matrix, for this reach: Most of the shoreline exhibits fragmented forest cover adjacent to residential use plots.</p> <p>From I&C: Around Nisqually Head and Luhr Beach, there are some small areas of built environment and non-forest vegetation within 100 feet of the shoreline.</p> <p>Characterized as Residential, undeveloped, aquatic</p> <p>From I&C: Nisqually Reach south to Nisqually Head contains low density residential development with associated impervious surfaces. MNI-21 to MNI-24 and MNI-25-MNI-26 contain the Nisqually Habitat Management Area owned by WDFW</p> <p>I&C lists southern Nisqually Reach as areas where docks are infrequent.</p>	<p>Many homes are more than 50' from the mapped water body of Puget Sound (which is not the OHWM), with vegetation between them and the beach. Many structures are within the buffer that a Rural Conservancy SED would provide. Some appear to be outside that buffer area.</p> <p>The shorelands retain some vegetation—entirety of reach has not been developed in SMP jurisdiction.</p> <p>There are some bulkheads noted but the majority of reach appears to retain natural shoreline configuration, with minimal modifications.</p>

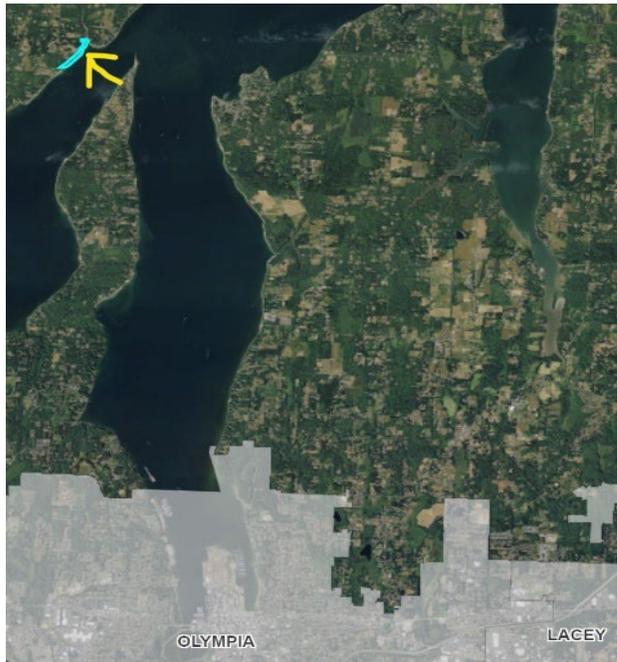
Nisqually Reach Staff Findings/Recommendations



- Reach contains residential development and some modifications
- Also contains vegetated slopes, mapped feeder bluffs, beaches with some visible large woody debris
- Staff recommendation: Based on review of criteria, retain proposed Rural Conservancy SED (residential area outside UGA/city boundaries with environmental limitations). Best matches existing conditions.



Eld Inlet (MEL-02—MEL-03)



- Current SED: Rural (Conservancy for 2 parcels and sand spit in north end of reach)
- Proposed SED: Shoreline Residential
- Requested SED: Rural Conservancy (for spit and ¼ mile south)





Eld Inlet (MEL-02—MEL-03) Issues Raised

- Comment Letter 162
- Cove/sand spit in north end of reach provides significant habitat; a portion has Natural SED proposed
- Adjacent proposed Shoreline Residential SED conflicts with Natural designation, will impact natural areas





Eld Inlet (MEL-02—MEL-03) Vs. Rural Conservancy Criteria



Rural Conservancy

Provide for sustained resource use, public access, and recreational opportunities while protecting ecological functions, and conserving existing ecological, historical, and cultural resources,

- Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:
- Currently supporting low-intensity resource-based uses such as agriculture, forestry, or recreation.
- Currently accommodating residential uses
- Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas
- Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes
- Private and/or publically owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.
- Does not meet the designation criteria for the Natural environment.



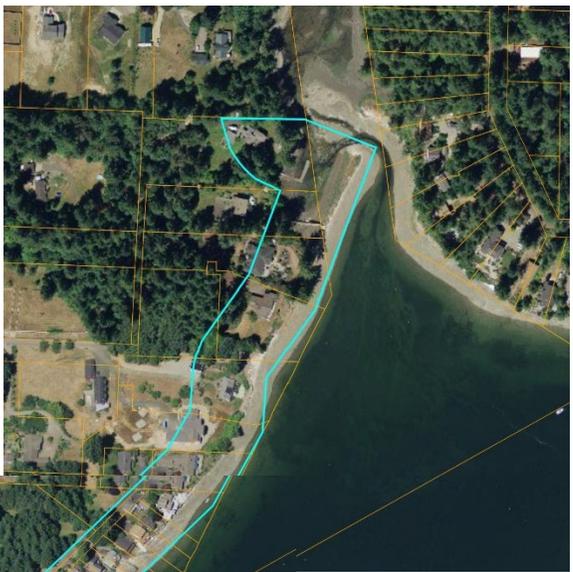
Eld Inlet (MEL-02—MEL-03) Vs. Rural Conservancy Criteria

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:		Yes
Currently supporting low-intensity resource based uses such as agriculture, forestry, or recreation.	None noted	Private recreation on individual parcels.
Currently accommodating residential uses	I&C matrix lists the following land uses: Undeveloped, residential, other-tidelands	Yes – dense development close to the water.
Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas	I&C matrix notes unstable, stable, and intermediate slopes. It also notes steep slopes in the north end of the reach, and potential landslide area.	Most of reach is mapped with steep slopes. Many areas appear to be low bank. Estuarine/marine wetlands are mapped inside and outside of Sanders Cove. Reach is mapped within floodplain, which appears to encroach onto several lots upslope from the beach.
Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes	Reach may contain the following species: smelt, rocksole. Reach may contain the following habitats: shellfish spawning, rearing and harvesting areas. SED report: High Priority restoration/preservation site for forage fish habitat, based on sediment source (north end of reach).	Such uses may be best suited to protecting ecological function of the more natural areas of this reach, including spit area.
Private and/or publicly owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.	No public access noted in I&C matrix.	Parcels have individual access to the shoreline throughout reach. Public may access the area from the water, though private ownership of tidelands appears to extend below the OHWM. Unsure if there is general public access to sand spit from the water.
Does not meet the designation criteria for the Natural environment.		The sand spit area may meet the criteria for the Natural SED, but the rest of this reach does not appear to.

Sh
w



Eld Inlet (MEL-02—MEL-03) Vs. Shoreline Residential Criteria



<p>Shoreline Residential</p>	<p>To accommodate residential development and appurtenant structures and provide appropriate public access and recreational uses in areas where medium and high density residential developments and services exist or are planned.</p>	<ul style="list-style-type: none"> • Does not meet the criteria for the Natural or Rural Conservancy Environments. • Predominantly single-family or multifamily residential development or are planned and platted for residential development. • Majority of the lot area is within the shoreline jurisdiction. • Ecological functions have been impacted by more intense modification and use.
-------------------------------------	---	--



Eld Inlet (MEL-02—MEL-03) Vs. Shoreline Residential Criteria



SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Does not meet the criteria for the Natural or Rural Conservancy Environments.	SED report includes this criteria.	Yes. The majority of this reach does not appear to meet the criteria of either of these SEDs.
Predominantly single-family or multifamily residential development or are planned and platted for residential development.	SED report includes this criteria. Also says: Estimated average set back less than 50 feet from OHWM.	Yes. Nearly all, if not all lots in this reach contain residential development.
Majority of the lot area is within the shoreline jurisdiction.	SED report includes this criteria.	Yes. This appears to be the case for almost all lots in this reach.
Ecological functions have been impacted by more intense modification and use.	<p>From SED report: Shoreline vegetation is comprised of trees and shrubs that extend upslope into mostly residential areas, with some areas of clearing to the shoreline</p> <p>I&C matrix notes bulkheads continuous throughout reach.</p>	Yes. Along this reach, many lots have homes and appurtenances very close to the water, with significant vegetation clearing and numerous shoreline stabilization structures.



Conclusions/Recommendations

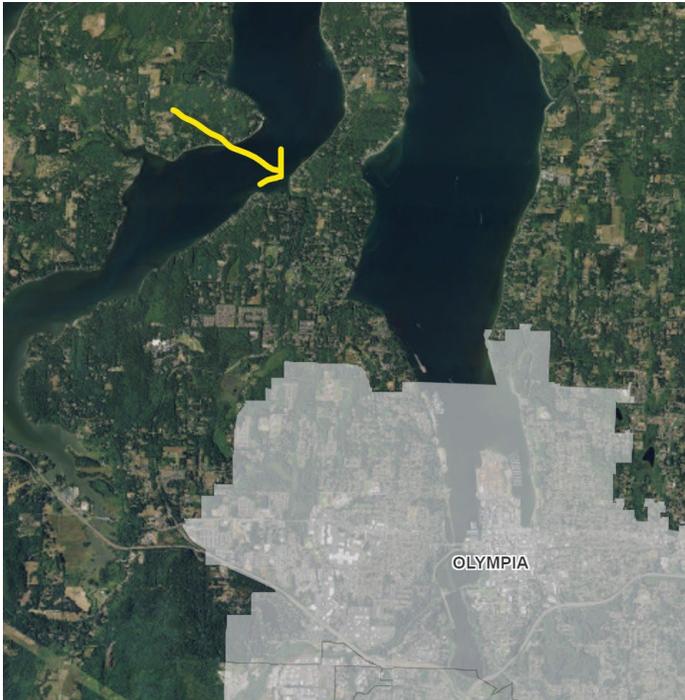
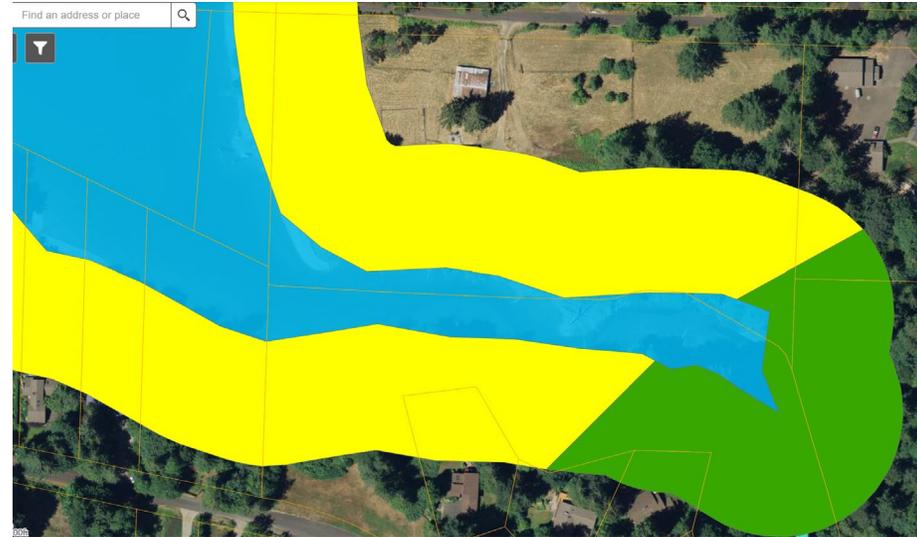
- Most of reach has residential development close to the water (within 50 feet)
 - Some lots at north end are less modified, though structures/alterations are present in SMP jurisdiction
- Sand spit area in north end of reach is more intact
 - Area is protected by existing land use regulations
 - Sub-parcel property designations are not ideal/consistent with overall update process
- Retain proposed Shoreline Residential SED for entire reach





Eld Inlet (MEL-29—MEL-30 Vicinity)

- Current SED: Conservancy
- Proposed SED: Natural and Conservancy (toward mouth of cove)
- Requested SED: Natural





Eld Inlet (MEL-29—MEL-30) Issues Raised

- Comment Letter 43
- Green Cove is “a rich and rare estuary, and is essentially wild...from the creek inlet to estuary mouth”
- Important ecological functions could be lost without Natural SED
- Area is unprotected outside the SMP
- Natural SED should be extended to mouth of estuary



Eld Inlet (MEL-29—MEL-30) Vs. Natural Criteria

	<p>Natural</p>	<p>Protect those shoreline areas that are relatively free of human influence, and/or that include intact or minimally degraded shoreline functions intolerant of human use. Only very low intensity uses are allowed in order to maintain the ecological functions and ecosystem-wide processes.</p>	<ul style="list-style-type: none"> • Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity. • Considered to represent ecosystems and geologic types that are of particular scientific and educational interest • Unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety. • Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats. • Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation. • Generally free of structural shoreline modifications, structures, and intensive human uses.
--	-----------------------	--	---



Eld Inlet (MEL-29—MEL-30) Vs. Natural Criteria

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
<p>Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity.</p>	<p>SED report states this for Reach MEL-29—MEL-30.</p>	<p>Somewhat – There are 3 parcels at east end of Reach MEL-28—MEL-29 appear somewhat intact, though site visits have not been performed. One is used for recreation, two have residences. There are two parcels on the east end of Reach MEL-30—MEL-31 with significant vegetation along the shoreline, though conversion to lawn has occurred in the outer half (estimated) of SMP jurisdiction. A house and appurtenances are visible. The east end of the larger parcel appears to be in a more natural state.</p>
<p>Considered to represent ecosystems and geologic types that are of particular scientific and educational interest</p>	<p>SED report states this for Reach MEL-29—MEL-30 (estuarine zone).</p>	<p>Yes – The whole area in question contains Green Cove, an estuary.</p>
<p>Unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.</p>	<p>I&C matrix lists unstable and stable slopes, and steep slopes, for Reach MEL-28/29, and MEL-30/31.</p>	<p>Some areas more heavily vegetated than others. In these areas, new development could cause significant adverse impacts to ecological function. The entire area is mapped in steep slopes, which would be evaluated before development is permitted. Floodplain is mapped at toe of slopes.</p>
<p>Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats.</p>	<p>SED report states this for Reach MEL-29—MEL-30.</p>	<p>Many areas adjacent to Green Cove appear to be largely undisturbed, though tree canopy cover obscures view of the ground. Some disturbances are visible within shoreline jurisdiction, including residential structures and/or lawns. Green Cove is mapped as estuarine and marine wetland.</p>
<p>Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation.</p>	<p>SED report states this for Reach MEL-29—MEL-30.</p>	<p>Many areas of Green Cove retain a native Douglas fir overstory. Condition and composition of understory is unknown. From aerial photographs, the shoreline configuration in this area appears unmodified.</p>
<p>Generally free of structural shoreline modifications, structures, and intensive human uses.</p>	<p>SED report states this for Reach MEL-29—MEL-30.</p>	<p>There is a mixture of conditions in the study area; 3 homes are in or adjacent to SMP jurisdiction. Associated clearing of vegetation for lawns/human use is evident in places.</p>



Eld Inlet (MEL-29—MEL-30) Vs. Rural Conservancy Criteria



<p>Rural Conservancy</p>	<p>Provide for sustained resource use, public access, and recreational opportunities while protecting ecological functions, and conserving existing ecological, historical, and cultural resources,</p>	<ul style="list-style-type: none"> • Outside incorporated municipalities and outside urban growth areas, AND at least one of the following: • Currently supporting low-intensity resource-based uses such as agriculture, forestry, or recreation. • Currently accommodating residential uses • Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas • Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes • Private and/or publically owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access. • Does not meet the designation criteria for the Natural environment.
---------------------------------	---	---



Eld Inlet (MEL-29—MEL-30 Vs. Rural Conservancy Criteria)

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:	SED report states this for reaches MEL-28—MEL-29 and MEL-30—MEL-31.	Yes, Green Cove is outside the cities and UGAs.
Currently supporting low-intensity resource based uses such as agriculture, forestry, or recreation.	SED report states this for reaches MEL-28—MEL-29 and MEL-30—MEL-31 (aquaculture)	Parcel owned by the Green Park Community Club in MEL-28—MEL-29 is used for recreation.
Currently accommodating residential uses	SED report states this for reaches MEL-28—MEL-29 and MEL-30—MEL-31.	Yes, on some parcels
Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas	SED report states this for reaches MEL-28—MEL-29 and MEL-30—MEL-31.	Yes. Area is mapped with steep slopes. Floodplains are mapped at toe of slope.
Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes	SED report states this for reaches MEL-28—MEL-29 and MEL-30—MEL-31.	This area may be best suited to such uses given the existing conditions.
Private and/or publicly owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.	SED report states this for reaches MEL-28—MEL-29 - Green Park Comm. Club	Parcel owned by the Green Park Community Club in MEL-28—MEL-29 is used for recreation. Other parcels have limited recreation potential and are in private ownership. The entirety of Puget Sound is of great cultural significance to area tribes.
Does not meet the designation criteria for the Natural environment.	SED report states this for reaches MEL-28—MEL-29 and MEL-30—MEL-31.	Portions of the area adjacent to Green Cove appear largely intact, though some structures and vegetation conversion are visible within SMP jurisdiction.





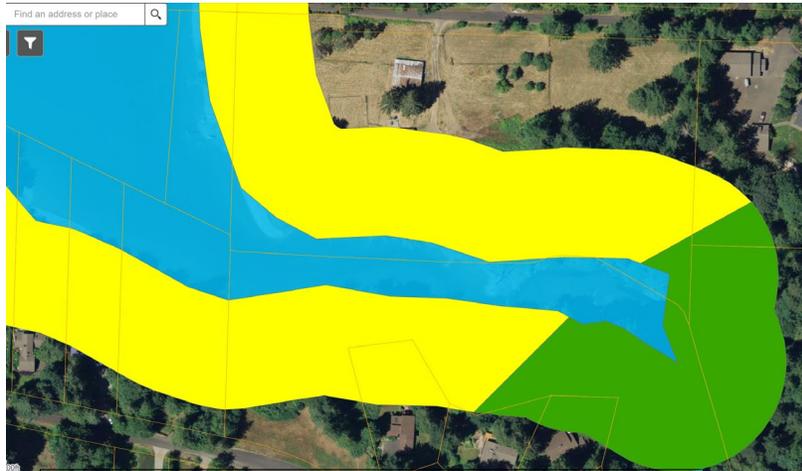
Conclusions/Recommendations

- Reach MEL-29—MEL-30 appears to meet criteria for the Natural SED.
- As a whole, reaches MEL-28—MEL-29 and MEL-30—MEL-31 appear to meet the Rural Conservancy criteria.
- Some areas adjacent to Reach MEL-29—MEL-30 appears intact, particularly in Reach MEL-28—MEL-29.

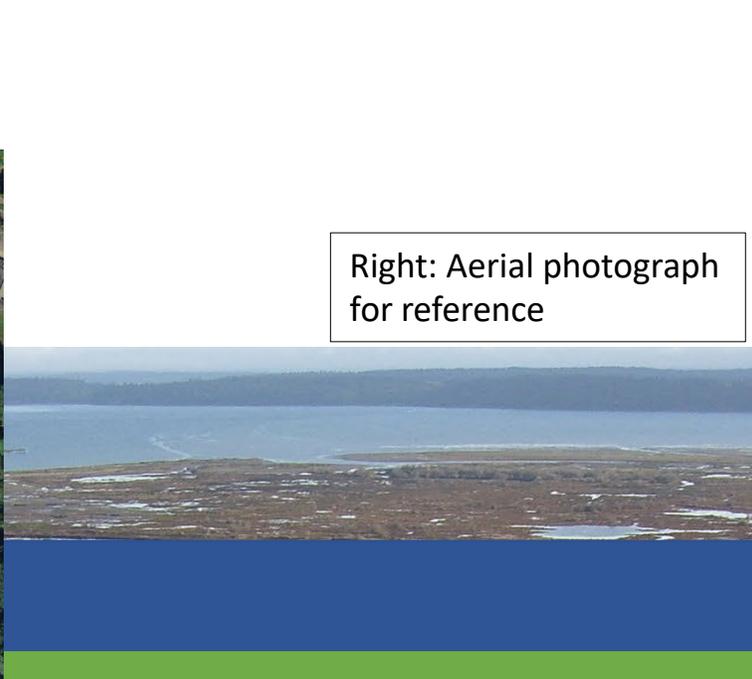


Conclusions/Recommendations

- Re-align boundaries of Reach MEL-29—MEL-30 to fit existing ground conditions
 - Align Reach Break 29 with edge of HOA-owned parcel
 - Align Reach Break 30 with existing parcel line



Top image: current boundaries of Reach MEL-29—MEL-30. Bottom image: Staff recommended boundaries.



Right: Aerial photograph for reference





Planning Commission Discussion

Next Steps: Review additional SEDs from public comments
 Wrap up any remaining items
 Prepare SMP Recommendation to BOCC

