

Attachment A

The series of tables below provide the background analysis for the Narrative Evaluation memo.

Table A- 1. Existing and Proposed Allowed Uses

Potential Uses and Activities in Reach Budd 3A	Existing SMP (1990)	Proposed SMP (2012)
Residential (multi-family condominiums)	Any type of residential structure or unit is allowed (Section Three, XVI.D.1)	Residential is permitted (Table 6.1).
Non-water-oriented Commercial (office and retail)	Retail uses associated with water-dependent activities and non-water-dependent commercial uses are allowed (Section Three, V.D.1)	Non-water-oriented commercial is permitted or conditionally permitted, depending on distance from the ordinary high water mark (Table 6.1).
Boating facilities (marinas)	They are not permitted in the West Bay Industrial Management Unit (Section Eleven, VI.B.6.c) They are permitted in the Northern West Bay Management Unit (Section Eleven, VI.B.6.c)	Marinas are permitted (Table 6.1)
Water-related Recreation (waterfront trail, public access points)	Recreational use is permitted (Section Three, XIV.D.1)	Water-related recreation is permitted (Table 6.1)
Transportation (roadways)	Local, public or private access roads to serve uses permitted in the Urban Environment are permitted. Transportation thoroughfares including major arterials, highways and railways are permitted (Section Three, XVII.D.1)	New roads are not allowed. Existing roads may be expanded or improved within existing rights-of-way. Expansion beyond existing ROW is allowed if part of an existing, adopted plan. A CUP is required if located within first 100 feet from ordinary high water mark (Table 6.1)
Parking	Parking is permitted (Section Three, XII.D.1)	Parking is permitted. Commercial parking lots as a primary use are prohibited (Table 6.1).
Dredging	Dredging necessary to clean up toxic sediments is permitted in the West Bay Industrial Management Unit (Section Eleven, IV.H.3) Dredging to accomplish over-the-water development is prohibited in the Northern West Bay Management Unit until a Habitat Advisory Committee is established (Section Eleven, VI.B.6.c)	Dredging is permitted for specific uses: <ol style="list-style-type: none"> 1. In conjunction with a water-dependent use; 2. In conjunction with a bridge, navigational structure, wastewater treatment facility; 3. Maintenance of irrigation reservoirs, drains, canals or ditches for agricultural and stormwater purposes; 4. Establishing, expanding, relocating, reconfiguring navigation channels and basins where necessary to assure accommodation of existing navigational uses; 5. Maintenance dredging 6. Restoration 7. Public access and public water-oriented recreational development and uses; 8. Minor trenching to allow installation of underground pipes or cables (Table 7.1).

Potential Uses and Activities in Reach Budd 3A	Existing SMP (1990)	Proposed SMP (2012)
Fill	Landfilling for developing a site for a use authorized under the program is permitted provided landfill associated with a dock or pier is only allowed when needed to protect shoreside abutments (Section Three, IX.D.1). The SAMP does not address landfilling.	Fill is permitted (Table 7.1)
Shoreline Stabilization	Shoreline protective measures are permitted, including bulkheads, dikes, levees, riprap, sea walls, shoreline berms, beach feeding and breakwaters (Section Three, XVIII.D.1)	Hard and soft armoring is conditionally allowed (Table 7.1)

Table A- 2. Existing and Proposed Bulk and Dimensional Standards

Bulk and Dimensional Standards	Existing SMP (1990)	Proposed SMP (2012)
Minimum Vegetation Buffer	Only residential structures are required to provide a buffer of ground cover between the ordinary high water mark and 20 feet. This may be increased for slopes greater than 40 percent or decreased to accommodate structure averaging allowances.	30 feet (Table 6.2)
Minimum Shoreline Setback	None specified	30 feet Trails, viewing platforms, wildlife blinds, interpretative areas: 10 feet Utilities, roads and railroads: Within existing right of way (Table 6.2)
Maximum Building Heights	<u>Landward of the OHWM</u> Commercial buildings over 35 feet are allowed if they do not obstruct the view of substantial numbers of residences or upland properties Residential structures cannot exceed 35 feet above average grade unless it can be shown through a variance process that a higher structure will not interfere with visual access to the water. <u>Waterward of the OHWM</u> West Bay Industrial Management Unit: 35 feet Northern West Bay Management Unit: 20 feet	Water-enjoyment-recreation (viewing platforms, wildlife blinds, interpretative areas): 25 feet Structures accessory to marinas: 16 feet Upland boathouses: 20 feet All other uses: 42-65 feet or 65 feet consistent with OMC 18.06.100 (Table 6.2)

Table A- 3. Existing Critical Area Standards

Critical Areas Standard (OMC 18.32)	Urban Waterfront
Drinking Water (Wellhead) Protection Areas	<p>Certain uses are prohibited within designated drinking water (wellhead) protection areas or prohibited from expanding within the 6-month and 1-year time of travel zone. None of these uses are expected to be developed in Reach Budd 3A.</p> <p>All other uses not considered exempt from the review requirements of wellhead protection areas are subject to minimum mitigation standards and review by the Thurston County Health Officer. These standards include submittal of a hazardous materials management (spill) plan, landscaping and irrigation plans, well inventory report, a grant to the Department, and groundwater monitoring well.</p>
Important Habitats and Species (endangered/threatened species under the Endangered Species Act or state-designated by Washington Department of Fish and Wildlife as endangered/threatened and the habitat primarily associated with those species)	<p>When a development proposal lies within 1,000 feet of an important habitats and species location a Management Plan must be submitted. Buffers, restrictions on uses and activities and minimum performance standards may be imposed based on the recommendations of the Management Plan.</p>
Streams and Important Riparian Areas	<p>Stream buffers for Type 1-5 streams are established and range from 50-250 feet. Important riparian area buffers range from 150-250 feet. Buffers can be reduced, increased or averaged under certain circumstances.</p> <p>Certain activities which change the existing condition of streams or important riparian areas are prohibited within a stream or important riparian area and its associated buffer.</p> <p>Bank stabilization, shoreline access, docks, floats, roads, trail construction and utility lines are allowed in stream or important riparian areas or its buffer.</p>
Wetlands and small lakes	<p>Wetland buffers are established based on category, habitat score, water quality improvement score, and type (estuarine, bog, natural heritage wetlands). These buffers range from 50 – 300 feet. Impacts to wetlands and buffers must provide compensatory mitigation.</p>
Landslide Hazard Areas (Steep slopes of 40% or greater, certain slopes of 15% or greater and recent landslide areas)	<p>There are limitations imposed on certain development in the landslide hazard area or its buffer. A buffer equal to the greater of the following must be established:</p> <ul style="list-style-type: none"> • Minimum distance recommended by the engineering geologist or geotechnical engineer • 1/3 the height of the slope at the top of the landslide HA • 1/2 the height of the slope at the bottom of the landslide HA • 50 feet in all directions from a seep <p>Buffers may be reduced under certain circumstances when supported by a geotechnical report.</p>

Table A- 4. Existing and Proposed Regulations

Development/Use	Existing SMP (1990)	Proposed SMP (2012)
No net loss of ecological function concept	Requiring development to ensure no net loss to habitat function is established as part of the Olympic SAMP (Section Eleven, V.D.10). Over-water development must mitigate and enhance such that there is no net loss in habitat function, value and acreage to fish and wildlife habitats.	All shoreline uses and development must be located, designated, constructed and maintained in a manner that maintains shoreline ecological functions and processes (Section 5.7.3.A).
Public Access	<p>Marinas must make available public access opportunities provided it does not endanger public health and safety or is not physically feasible (Section Three, IV.C.9).</p> <p>Water-dependent or water-related commercial uses must provide public access when feasible (Section Three, V.C.4).</p> <p>New residential development must provide public access to and along shorelines that have been historically used by the public for recreation (Section Three, XVI.C.14).</p> <p>All over-the-water uses and developments must provide safe public access. Four types of public access are established and are intended to be used as a guideline for permitting requirements (Section Eleven, V.D.7):</p> <ol style="list-style-type: none"> 1. Type I: Direct physical connection to the water's edge including floats, docks and boat launches. 2. Type II: Immediate proximity to the water's edge but not the physical ability to touch the water. 3. Type III: Unobstructed and proximate view of waterward side of the project. 4. Type IV: Visual access to the waterfront and shoreline interpretation. 	Public access is required for residential developments of more than 9 lots or dwelling units, commercial or industrial developments, shoreline development proposed or funded by a public entity. Public access requirements may be waived under certain circumstances.

Development/Use	Existing SMP (1990)	Proposed SMP (2012)
Vegetation Conservation	<p>Landfill areas must be covered with significant earth material to support indigenous vegetative ground cover and replanted with vegetation to blend with the surrounding environment (Section Three, IX.C.4)</p> <p>Residential development must establish a 20 foot buffer of existing ground cover. The ground cover may be disturbed when one of the following conditions apply (Section Three, XV1.D.1):</p> <ul style="list-style-type: none"> • A building site has been approved in the buffer area and an erosion control and vegetation protection plan has been approved. • The applicant wishes to landscape the area with other vegetation and has an approved erosion control plan. • For a constructed access pathway. <p>Vegetation must be maintained on streambanks except where removal is necessary for a permitted activity in which case it should be re-established where feasible and as soon as possible following its removal (Section Three, XVIII.C.2).</p> <p>Utility projects must identify a method of reclamation which provides for revegetation and protection of wetlands from erosion (Section Three, XX.C.3).</p>	<p>Parcels with frontage on marine waters must preserve or provide native vegetation within vegetation conservation areas (or buffers), which in the Urban Intensity environment must be equal to 30 feet.</p> <p>Existing native vegetation in vegetation conservation areas must be protected, or if significantly degraded, restored or enhanced.</p> <p>Nonconforming or water-dependent uses that cannot provide a vegetation conservation area due to the nature of the use/activity must provide an equivalent area elsewhere on the subject property or off-site.</p> <p>Clearing and grading proposals must be accompanied by a vegetation management plan.</p> <p>The following uses are allowed in a vegetation conservation area:</p> <ul style="list-style-type: none"> • Transportation facilities and utilities within existing rights-of-way • Pedestrian access • Public access viewpoints, trails • Educational facilities • Equipment for water-dependent uses • Noxious weed or hazardous tree removal • Removal and thinning of trees on public property • Restoration, mitigation, enhancement • Shoreline stabilization • Up to 25% of the area can be used for authorized uses and activities (Section 5.9)
Residential (multi-family condominiums)	There are no standards specific to multi-family residential development.	Standards specific to multi-family residential development limit docks to one single joint-use dock for the entire development (Section 6.10.2.1)
Non-water-oriented Commercial (office and retail)	Non-water-oriented commercial uses may be allowed provided the site is designed in a manner to allow substantial numbers of people access to and enjoyment of the shoreline and the use does not discourage public enjoyment of the shoreline due to impacts such as traffic, noise and other emissions (Section Three, V.D.1).	Non-water-oriented uses may be allowed only if they are part of a mixed use development that include water-oriented uses, provide public access, and shoreline enhancement/restoration (Section 6.7.4.A).

Development/Use	Existing SMP (1990)	Proposed SMP (2012)
Boating facilities (marinas)	<p>Marinas may have covered moorage that does not exceed 50 percent of the total number of slips (Section Three, IV.D.1).</p> <p>Marinas with existing covered moorage that does not comply with the Program may repair and maintain existing structures, may relocate and replace with new structures provided area covered is not increased.</p>	<p>New over-water covered moorage and the expansion of existing covered moorage is prohibited (Section 6.6).</p> <p>Standards for marinas are included that address the following:</p> <ul style="list-style-type: none"> • Avoidance of hard armoring • Restoration measures to improve baseline conditions • Prevention of grounding on tidelands • Minimization of shading of nearshore aquatic habitats • Allowance of fish passage along the shallow fringe • Facilities for containment and recovery of spilled petroleum or toxic products
Water-oriented Recreation (waterfront trail, public access points)	<p>There are no standards specific to trails and public access points.</p>	<p>Trails must be buffered from sensitive ecological features and provide limited and controlled access to sensitive features and the water's edge where appropriate.</p> <p>The width of trails must be based on the trail classification and corresponding corridor widths set forth in the Olympia Engineering Design and Development Standards (Section 5.4.3).</p>
Transportation (roadways)	<p>Standards for roads are included that address the following:</p> <ul style="list-style-type: none"> • Shoreline crossings • Tideland, shoreland and marsh filling • Setback from the ordinary high water mark • Stormwater runoff • Disposal of debris, overburden and other waste materials (Section Three, XVII.C) 	<p>Standards similar to those in the existing SMP are included in addition to the following:</p> <ul style="list-style-type: none"> • Road expansions must be located as far landward as possible, be designed to protect shorelands against erosion and polluted drainage, proposed width is the minimum necessary, design fits the topography, streams are protected, location and design would not compromise existing and planned public access or habitat restoration (Section 6.11.2).
Parking	<p>Parking must serve a shoreline use, is not permitted over water, and must be located landward of the principal building except when it is within or beneath the structure (Section Three, XII.C).</p>	<p>Parking lots are allowed only to support authorized uses. Parking must be located landward of the principal building except when it is located within or beneath the structure. Low impact development best management practices should be incorporated to the extent feasible (Section 5.3.2).</p>

Development/Use	Existing SMP (1990)	Proposed SMP (2012)
Dredging	A dredging plan must be submitted that identifies location and quantity of material to be removed, method of removal, location of spoil disposal sites, and plans for the protection and restoration of the wetland environment (Section Three.VI.C.1).	Dredging which will damage shallow water habitat is prohibited unless an alternative alignment or location is not feasible, the project is designed to minimize its impact on the environment and the facility is in the public interest. In-kind habitat near the project or rehabilitation of degraded habitat is required for projects that create significant unavoidable adverse impacts (Section 7.3.2)
Fill	Landfill is the creation of dry land by depositing materials into a wetland or shoreland. Landfills must consist of clean materials and must not cause detrimental change in flood elevations or restrict stream flow or velocity (Section Three, IX.C).	<p>Fill waterward of the ordinary high water mark is restricted to:</p> <ul style="list-style-type: none"> • Port development • Expansion or alteration of transportation facilities • Restoration or enhancement • Construction of protective berms • Public access • Cleanup of contaminated sites (Section 7.4.3) <p>Shoreland fill must be the minimum necessary to accommodate the proposed use or development, must demonstrate that it will not result in significant damage to water quality, fish, shellfish, and wildlife habitat, adversely alter natural drainage and circulation patterns, or alter geomorphic or hydrologic processes. Fill must consist of clean material and not be located where shoreline stabilization will be necessary (Section 7.4.2).</p>
Shoreline Stabilization	<p>Vegetative bank stabilization methods are preferred over structural methods unless such methods will not provide adequate protection. Protective structures are allowed only when one of the following conditions exist:</p> <ul style="list-style-type: none"> • Erosion or an active feeder bluff is threatening agricultural land, public roads or bridges, existing structures or areas of unique public interest • Necessary to the operation and location of shoreline dependent and related activities • For repair and replacement (Section Three, XVIII.C) 	<p><u>New development (Section 7.7.2)</u> New development that includes structural shoreline stabilization is allowed only when all of the following conditions can be met:</p> <ul style="list-style-type: none"> • A geotechnical report demonstrates the need to protect development from damage due to erosion is caused by natural and managed processes • Erosion is not caused by upland conditions • Nonstructural measures are not feasible • Impacts to sediment transport are avoided/minimized • Adverse impacts to down-current properties are not caused <p><u>New or expanded shoreline stabilization (Section 7.7.3)</u> New or expanded shoreline stabilization measures are prohibited except where</p>

Development/Use	Existing SMP (1990)	Proposed SMP (2012)
		<p>necessary to protect or support existing or approved development, for human safety, for restoration or enhancement activities, or remediation of contaminated sites.</p> <p>New or expanded shoreline stabilization measures for an existing, legally established development is prohibited unless the structure is in danger from erosion caused by currents, waves, or boat wakes.</p> <p>Soft structural stabilization measures or non-structural measures must be demonstrated as infeasible by a geotechnical analysis.</p> <p><u>Replacement and repair</u></p> <p>An existing 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.</p>