

# memorandum

date December 2, 2010  
to Jeff Boers  
from Michael Muscari and Teresa Vanderburg, ESA Adolfson (ESA)  
subject Shoreline Environment Designations (SED): Justification Memo

The City of University Place's Shoreline Master Program (SMP) establishes a system to classify shoreline areas into specific "environment designations." This system of classifying shoreline is established by the Shoreline Management Act (RCW 90.58) and Master Program Guidelines (WAC 173-26-211). The purpose of shoreline environment designations is to provide a uniform basis for applying policies and regulations in distinct shoreline areas having similar characteristics. Generally, shoreline designations should be based on:

1. Ecological functions provided by the shoreline (including biological resources and critical area characteristics);
2. Existing and planned development patterns; and
3. The community's vision or objectives for its future management.

The purpose of this memo is to describe the shoreline environment designation used in the City's existing 2000 SMP and then present preliminary recommendations for updating the environment designation in the City as part of the SMP update process.

The current University Place's SMP establishes three shoreline designations:

1. Shoreline Residential,
2. Conservancy, and
3. Conservancy Low.

The state guidelines identify six basic shoreline environment designations, associated management policies, and designation criteria to assist jurisdictions with their updates. As outlined in WAC 173-26-211, these are:

1. High-Intensity,
2. Shoreline Residential,
3. Urban Conservancy,
4. Rural Conservancy,
5. Natural, and
6. Aquatic.

Table 1 below describes existing designations, the intended use and purpose, and general description or criteria used for their application as defined in the City's SMP. Table 2 describes the six shoreline environment

designations recommended by Ecology's guidelines. A discussion of broad recommendations related to adjusting the City's environment designations follows the tables. It is important to note that these recommendations are preliminary and are based on information and findings in the Shoreline Inventory and Characterization Report.

**Table 1. Existing University Place SMP Shoreline Environment Designations (2000)**

<b>Environment Designation</b>	<b>Purpose</b>	<b>Criteria for Assigning Designations / Description of Areas</b>
Shoreline Residential	Accommodate residential development and associated uses in areas with existing or planned adequate water and sanitary sewer facilities, providing appropriate public access while also minimizing adverse shoreline impacts. In developing regulations, give consideration to the historical development pattern of residential communities.	<p>Areas to be designated “shoreline residential” should meet one or more of the following criteria:</p> <ol style="list-style-type: none"> <li>1. The shoreline is used or designated for areas dominated by or planned for residential development.</li> <li>2. The shoreline is lower intensity use, where surrounding land use is predominately residential and where urban services are available.</li> <li>3. The shoreline is generally without significant environmental limitations to development such as steep slopes, landslide and erosion hazard areas, wetlands and sensitive areas.</li> </ol> <p>Areas designated: Sunset Beach, Day Island, and the areas in between.</p>
Conservancy	Implement a “Conservancy” shoreline environment designation to protect, conserve and manage natural resources and habitat, to provide recreation and public access, and to designate areas with physical constraints and limitations for future development.	<p>Areas to be designated “Conservancy” should meet one or more of the following criteria:</p> <ol style="list-style-type: none"> <li>1. Shorelines free from extensive development.</li> <li>2. Shorelines of high recreational value or potential.</li> <li>3. Shorelines with extensive or unique historic or cultural resources.</li> </ol> <p>Area designated: Chambers Creek Properties</p>
Conservancy Low	Implement a “Conservancy-Low” shoreline environment designation for the Chambers Creek Canyon to reflect the Creek’s opportunities for passive recreation use while also protecting the Creek’s unique natural ecosystem and critical areas. Allow less intensive development than might typically be allowed in the “Conservancy” shoreline environment designation.	<p>The Conservancy-Low Environment designation should be based on one or more of the following criteria:</p> <ol style="list-style-type: none"> <li>1. The shoreline has some unique natural or cultural feature considered valuable in its natural or original condition.</li> <li>2. The shoreline is relatively intolerant of intensive human use.</li> <li>3. The shoreline is valuable as a historical, cultural, scientific or education site by virtue of its natural unaltered original condition.</li> <li>4. The shoreline is subject to sever biophysical limitations such as steep slopes or landslide hazard areas, flood prone areas, and/or areas with soils that have poor drainage.</li> </ol> <p>Area designated: Chambers Creek</p>

**Table 2. Shoreline Environment Designations Recommended by State Shoreline Guidelines (WAC 173-26-211)**

Environment Designation	Purpose	Criteria for Assigning Designations
Aquatic	The purpose of the "aquatic" environment is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark.	Assign an "aquatic" environment designation to lands waterward of the ordinary high-water mark.
Natural	The purpose of the "natural" environment is to protect those shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline functions intolerant of human use. These systems require that only very low intensity uses be allowed in order to maintain the ecological functions and ecosystem-wide processes. Consistent with the policies of the designation, local government should include planning for restoration of degraded shorelines within this environment.	A "natural" environment designation should be assigned to shoreline areas if any of the following characteristics apply: (A) The shoreline is ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity; (B) The shoreline is considered to represent ecosystems and geologic types that are of particular scientific and educational interest; or (C) The shoreline is unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.
Rural Conservancy	The purpose of the "rural conservancy" environment is to protect ecological functions, conserve existing natural resources and valuable historic and cultural areas in order to provide for sustained resource use, achieve natural flood plain processes, and provide recreational opportunities. Examples of uses that are appropriate in a "rural conservancy" environment include low-impact outdoor recreation uses, timber harvesting on a sustained-yield basis, agricultural uses, aquaculture, low-intensity residential development and other natural resource-based low-intensity uses.	Assign a "rural conservancy" environment designation to shoreline areas outside incorporated municipalities and outside urban growth areas, as defined by RCW 36.70A.110, if any of the following characteristics apply: (A) The shoreline is currently supporting lesser-intensity resource-based uses, such as agriculture, forestry, or recreational uses, or is designated agricultural or forest lands pursuant to RCW 36.70A.170; (B) The shoreline is currently accommodating residential uses outside urban growth areas and incorporated cities or Cities; (C) The shoreline is supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, or flood plains or other flood-prone areas; (D) The shoreline is of high recreational value or with unique historic or cultural resources; or (E) The shoreline has low-intensity water-dependent uses.
Urban Conservancy	The purpose of the "urban conservancy" environment is to protect and restore ecological functions of open space, flood plain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses.	Assign an "urban conservancy" environment designation to shoreline areas appropriate and planned for development that is compatible with maintaining or restoring of the ecological functions of the area, that are not generally suitable for water-dependent uses and that lie in incorporated municipalities, urban growth areas, or commercial or industrial "rural areas of more intense development" if any of the following characteristics apply: (A) They are suitable for water-related or water-enjoyment uses;(B) They are open space, flood plain or other sensitive areas that should not be more intensively developed;(C) They have potential for ecological restoration;(D) They retain important ecological functions, even though partially developed; or (E) They have the potential for development that is compatible with ecological restoration.
Shoreline Residential	The purpose of the "shoreline residential" environment is to accommodate residential development and appurtenant structures that are consistent with this chapter. An additional purpose is to provide appropriate public access and recreational uses.	Assign a "shoreline residential" environment designation to shoreline areas inside urban growth areas, as defined in RCW 36.70A.110, incorporated municipalities, "rural areas of more intense development," or "master planned resorts," as described in RCW 36.70A.360, if they are predominantly single-family or multifamily residential development or are planned and platted for residential development.
High-Intensity	The purpose of the "high-intensity" environment is to provide for high-intensity water-oriented commercial, transportation, and industrial uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded.	Assign a "high-intensity" environment designation to shoreline areas within incorporated municipalities, urban growth areas, and industrial or commercial "rural areas of more intense development," as described by RCW 36.70A.070, if they currently support high-intensity uses related to commerce, transportation or navigation; or are suitable and planned for high-intensity water-oriented uses.

## Broad Recommendations – Environment Designation Types

The Ecology guidelines provide that local jurisdictions may retain their current environment designations, or create their own designations, as long as the environment designation system is consistent with the purposes and policies in the state guidelines (WAC 173-26-211).

In the context of findings in the Shoreline Inventory and Characterization report, we reviewed the City's existing shoreline environment and the suggested designation system in the Ecology guidelines (173-26-211(5)). Given the existing uses and functions of the shoreline in the City of University Place, we suggest the City consider the following general recommendations for adjusting the environment designation system in the City's SMP.

- **Eliminate two of the City's current designations.**
  - **Conservancy** - Most areas currently designated "Conservancy" would likely be designated "Urban Conservancy," under Ecology's recommended system.
  - **Conservancy-Low** – Most areas currently designated "Conservancy – Low" would be appropriate for the Natural designation under Ecology's recommended system.
- **Utilize one of the City's current designations.**
  - **Shoreline Residential** - This designation would be applied to areas that are predominately single-family and multi-family residential. This designation could be applied to residentially developed areas along the Puget Sound.
- **Utilize three (3) of Ecology's recommended designations.**
  - **Urban Conservancy** – Ecology's "Urban Conservancy" allows for a variety of uses while recognizing the need to manage natural resources and critical areas and to promote restoration of ecological functions in urban areas. This designation would be applied to developed shoreline areas, regardless of use, that also have designated critical areas, intact shoreline ecological functions, or areas with potential for restoration, such as Puget Sound South.
  - **Natural** - This designation would be applied to those areas that are ecologically intact, are unable to support new development or uses without impacts to ecological functions or risk to human safety, and have important natural resources and critical areas associated with them. This designation could be applied to Chambers Creek (north bank).
  - **Aquatic** – This designation would be applied to all areas waterward of the OHWM to address in-water work such as docks, piers, and ferry terminal activities.
- **Do not utilize two of Ecology's recommended designations.**

We do not believe the following Ecology designations would be appropriate for use in the City of University Place:

  - **Rural Conservancy** – these areas are intended for shorelines outside of incorporated cities and designated Urban Growth Areas.
  - **High Intensity** – these areas are intended for industrial and commercial water-dependent uses such as ferry landings, port facilities, and other intense uses.
- **Create new environment designation.**
  - **Day Island Medium Intensity** – designation recommended for mainland east of Day Island harbor where commercial boat storage facilities and marinas exist.

## Preliminary Specific Recommendations

This section describes the specific environment designations recommended for shoreline reaches in the City. Table 3 below shows: 1) the existing shoreline environment designations from the City's SMP; 2) the preliminary

recommendation for environment designations; and 3) the rationale for the recommendation. The attached map (to be developed) shows the preliminary recommended environment designations for the SMP update.

**Table 3. Existing and Proposed Shoreline Environment Designations**

<b>Planning Reach</b>	<b>Existing Shoreline Environment Designations (2000 University Place SMP)</b>	<b>Preliminary Recommended Environment Designations</b>
<b>Day Island</b> (northwestern corner of the City)	Shoreline Residential	Shoreline Residential Day Island Medium Intensity (areas with commercial marinas and overwater structures)
<i><b>Rationale:</b> Day Island is largely built out with single-family residential uses, including docks and other appurtenances. Higher intensity uses with marinas and non-residential overwater structures occur on island and on mainland east of harbor.</i>		
<b>Puget Sound North</b> (south end of Day Island to the north end of the Chambers Bay Golf Course)	Shoreline Residential	Urban Conservancy (except for Sunset Beach west of BNSF railroad tracks which is recommended to be Shoreline Residential)
<i><b>Rationale:</b> Puget Sound North reach includes high coastal bluffs east of the BNSF railroad tracks. These bluffs are in a landslide hazard zone and are important features of the nearshore environment. Other sensitive features include eelgrass presence and priority habitats. Areas of low bank include Sunset Beach, a developed residential community waterward of the railroad tracks.</i>		
<b>Puget Sound South</b> (north end of the Chambers Bay Golf Course to the dam and spillway at the head of Chambers Bay)	Conservancy	Urban Conservancy
<i><b>Rationale:</b> The Puget Sound South reach includes part of the Chambers Bay estuary, which provides higher value shoreline functions and refuge for fish using Chambers Creek. This shoreline lies within Chambers Creek Properties.</i>		
<b>Chambers Creek</b>	Conservancy - Low	Natural
<i><b>Rationale:</b> Chambers Creek reach includes unaltered forested riparian zones primarily owned by Pierce County and preserved for fish and wildlife habitat.</i>		
<b>All areas waterward of OHWM</b> (Puget Sound and Chambers Bay)	Undesignated	Aquatic
<i><b>Rationale:</b> Areas waterward of OHWM contain critical habitats that require a special designation to address in-water work.</i>		