



DRAFT

**SHORELINE MANAGEMENT
RECOMMENDATIONS for Shorelines in
Chelan County and the Cities of
Cashmere, Chelan, Entiat,
Leavenworth and Wenatchee**

**Project: Comprehensive Shoreline Master Program
Update**

- **Task 6: Summarize Characterization and Analyses
& Prepare Recommendations**

Prepared for:



Chelan County
Natural Resources Department
316 Washington Street, Suite 401
Wenatchee, Washington 98801

Prepared by:



**750 Sixth Street South
Kirkland WA 98033**



an ICF International Company

**710 Second Avenue, Suite 550
Seattle WA 98104**



This report was funded in
part through a grant from
the Washington
Department of Ecology.

March 3, 2009

Table of Contents

<u>Section</u>	<u>Page No.</u>
1. Introduction	1
2. SMP Guidelines Consistency Analysis	1
3. Environment Designation Recommendations	37
3.1 Background	37
3.2 Methodology	40
3.3 Recommendations.....	41
3.3.1 Chelan County	42
3.3.2 City of Cashmere	53
3.3.3 City of Chelan	54
3.3.4 City of Entiat	55
3.3.5 City of Leavenworth	56
3.3.6 City of Wenatchee	56
4. Zoning/Development Standards Analysis	57
4.1 Shoreline Management Act	57
4.2 Shoreline Master Program Guidelines.....	57
4.2.1 Regulatory Requirements	57
4.2.2 Discussion	58
5. Existing SMP Implementation Analysis	61
5.1 Chelan County.....	61
5.2 City of Cashmere	63
5.3 City of Chelan	63
5.4 City of Entiat	65
5.5 City of Leavenworth	65
5.6 City of Wenatchee	65
6. Restoration Plan	65

List of Tables	<u>Page No.</u>
Table 1. Existing Chelan County and City Shoreline Master Programs Consistency Analysis with Department of Ecology Shoreline Master Program Guidelines (WAC 173-26).....	5
Table 2. Summary of the Current SMP and Ecology’s Recommended Environment Designation Systems.....	38
Table 3. Correlation between Current SMP Environment Designations and Ecology’s Recommended Environment Designations.....	39
Table 4. Preliminary Environment Designation Recommendations by Reach in WRIA 40a/b.	42

Table 5.	Preliminary Environment Designation Recommendations by Reach in WRIA 45.	42
Table 6.	Preliminary Environment Designation Recommendations by Reach in WRIA 46.	48
Table 7.	Preliminary Environment Designation Recommendations by Reach in WRIA 47.	50
Table 8.	Preliminary Environment Designation Recommendations by Reach in the City of Cashmere and its Urban Growth Area.	53
Table 9.	Preliminary Environment Designation Recommendations by Reach in the City of Chelan and its Urban Growth Area.	54
Table 10.	Preliminary Environment Designation Recommendations by Reach in the City of Entiat and its Urban Growth Area.....	55
Table 11.	Preliminary Environment Designation Recommendations by Reach in the City of Leavenworth and its Urban Growth Area.	56
Table 12.	Preliminary Environment Designation Recommendations by Reach in the City of Wenatchee and its Urban Growth Area.....	56
Table 13.	Shoreline Development Standards.....	59
Table 14.	Recommendations for Restoration Plan Strategy	66

CHELAN COUNTY SHORELINE MASTER PROGRAM UPDATE SHORELINE MANAGEMENT RECOMMENDATIONS

1. INTRODUCTION

The following draft shoreline management recommendations for updating the SMP policies, environment designations, regulations and restoration strategies are based on the analyses presented in Chapters 5 through 7 of the *Shoreline Inventory and Analysis* report and additional analyses presented in this report. These shoreline management recommendations should be read in the context of the *Shoreline Inventory and Analysis* report as well as the *Community Vision Workshop Summary*, both available under separate cover. In addition, it is expected that as the Shoreline Master Program is further developed, there will be additional coordination with the County and Cities and associated public outreach which will result in some modifications of the recommendations over time.

While the *Shoreline Master Program Guidelines* (WAC 173-26) provide a substantive body of policy and regulation direction, there is still considerable flexibility in how local jurisdictions implement that direction based on local goals and conditions. As such, many of the following conclusions are recommendations only, except where it is clear in Table 1 that a particular element or provision is required.

2. SMP GUIDELINES CONSISTENCY ANALYSIS

Ecology has prepared a Shoreline Master Program Submittal Checklist to be used by local jurisdictions while preparing the SMP update. Although the checklist's purpose is for use by local jurisdictions and Ecology to identify consistency of the new SMP with the Guidelines, the table is an excellent utility for examining the existing SMP.

The following table (Table 1) uses the Submittal Checklist Contents section with two additional columns: Consistency Analysis and Recommendations. For each required element of the SMP, a determination has been made that the County and City SMPs are consistent, partially consistent, or not consistent.¹ The

¹ Consistent means a current SMP provision appears to meet the SMP Guidelines, partially consistent means there are elements of the existing SMP that are consistent and those that are not (i.e. there's a "base" upon

DRAFT Chelan County Shoreline Management Recommendations

Recommendations column has been divided into County and City sub-columns to recognize that recommendations may differ between the County and the various Cities.

Several major questions and issues were raised by the analysis which can be broken discretely into the following general topics:

- Wetlands vs. Shorelands: The use of the term “wetlands” throughout much of the SMPs, when the term “shorelands” is intended, introduces some basic implementation and interpretation difficulties.
- Organization: A number of required SMP sections/topics are either missing, or are intermixed and blended with other sections/topics. For example, the Guidelines have a general category of uses called Shoreline Modifications, which include specific regulatory sections for shoreline stabilization; piers and docks; fill; breakwaters, jetties, groins and weirs; dredging and dredge material disposal; and shoreline habitat and natural systems enhancement projects. In the County and City SMPs, these uses (when included at all) are also grouped under a Shoreline Works and Structures (SWS) section. Breaking the SWS section down into its components, and providing specific policies and regulations for each component, will add clarity to SMP implementation. Also, providing goals, policies and some regulations at the beginning of the Shoreline Modifications category that apply to all modifications would eliminate repetition in each sub-category and improve organization and efficiency. Other chapters of the SMP could benefit from the same organizational changes. The extent to which the County and each City are open to basic SMP re-organization should be discussed.
- Environment Designations: The recommendation is to continue utilizing the current SMP environment designations only in the County, and shift the Cities to an environment designation system that is similar to the Guidelines system, with differences noted below. Additionally, with the expansion of shoreline mapping and designation onto federal lands, it is recommended that a new, distinct environment designation be considered and applied.
- Critical Areas: With the exception of the County, the critical areas regulations vary in their consistency with the Guidelines requirements. For the County and a few of the Cities, the inconsistencies are minor enough that they can be easily addressed through provisions included in a new SMP Critical Areas chapter and references to the appropriate critical areas ordinance (CAO). However, some Cities need to undertake more substantial CAO updates to meet the Guidelines standards. As the

which amendments can be made to become consistent), and inconsistent means an element is missing or does not match SMP Guidelines.

DRAFT Chelan County Shoreline Management Recommendations

regional deadline for CAO updates under GMA is 2009, each City has indicated that it will begin its CAO update in 2009. Changes to the CAO under the GMA process will ideally include those needed to meet SMA requirements, and will then be available for inclusion in an SMP appendix with only minor alterations. Also, each City needs to decide how it wants to establish buffers for shoreline waterbodies in its critical areas regulations, or address shoreline buffers and/or shoreline setbacks in the body of the SMP regulations.

DRAFT Chelan County Shoreline Management Recommendations

THIS PAGE INTENTIONALLY LEFT BLANK

Table 1. Existing Chelan County and City Shoreline Master Programs Consistency Analysis with Department of Ecology Shoreline Master Program Guidelines (WAC 173-26).

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
Any goals adopted as part of the SMP are consistent with the SMA. <i>(Note: Goal statements are not required.)</i>	County: Pages 1-4 Cities of Cashmere, Entiat, Leavenworth and Wenatchee: Pages 1-3 City of Chelan: Not included	Chelan County, Cities of Cashmere, Entiat, Leavenworth and Wenatchee - Consistent: Goals A to I address economic development, public access, recreation, uses, conservation, historic/cultural, and other local topics such as agriculture and rehabilitation. Not Consistent: SMP lacks a flood damage goal City of Chelan: Consistent: Goal statements are not required.	Consistency: Add a flood damage element. Other Recommendations: Consider locating policies together with goals and/or policies with regulations. Goal E - consider referencing “no-net-loss” rather than “without diminishing the quality of environment”. Goal F - show complete title as “Goal for Historical/Cultural Element Scientific, Educational.” Goal H - consider reference to “agricultural lands of long term commercial significance” or other current terminology rather than “prime or unique agricultural lands” to be consistent with Comprehensive Plan. Goal I - consider using term restoration rather than rehabilitation in the title.	Cities of Cashmere, Entiat, Leavenworth and Wenatchee: Same as County. City of Chelan: While goal statements are not required, they are recommended to help frame key topics in the City’s SMP. A potential source of goal statements can be Comprehensive Plan goals that are compatible with SMP guidelines.
Policies (A) are consistent with guidelines and policies of the SMA; (B) address elements of RCW 90.58.100; and (C) include policies for environment designations, accompanied by a map or physical description of designation boundaries in sufficient detail to compare with comprehensive plan land use designations. (D) are consistent with constitutional and other legal limitations on regulation of private property. WAC 173-26-191(2)(a)(i) SMP implements preferred use policies of the SMA. WAC 173-26-201(2)(d)	County: Pages 5-20 Cities of Cashmere, Entiat, Leavenworth and Wenatchee: Pages 5-20 City of Chelan: Not included	Chelan County, Cities of Cashmere, Entiat, Leavenworth and Wenatchee - Partially Consistent (A) SMA Guidelines and Policies: Use policies are partially consistent but require amendment (e.g. have outdated references, partially address WAC guidelines, and include regulatory language): <ul style="list-style-type: none"> • Agriculture: Clarify applicability to existing versus new activities, cross reference appropriate laws related to water resources, and ensure consistency with WRIA plans. • Aquaculture: Address avoiding conflict with water dependent uses. • Forest Management: Move and update references to shoreline exemptions. Update to be compatible with Forest Practices Act. • Mining: Ensure consistency with Comprehensive Plan provisions for mineral lands of long-term commercial significance. Demonstrate dependency on shoreline location, no net loss, and preference for habitat formation due to mining. Address in-water gravel bar versus shorelands activities. • Residential: Address whether new floating homes are allowed or prohibited (not a preferred use). Address public access such as with multifamily uses. • Commercial: Address fuller range of water oriented uses. • Shoreline Works and Structures: Address preferred application of shoreline works and structures. Address preference for non-structural means of shoreline stabilization and minimization of structural means. • Dredging: Address minimization of dredging practices and preferences for methods and circumstances. • Solid Waste: Update per County solid waste management 	Consistency: Update as identified with consistency analysis. Other Recommendations: Put policies with goals and/or policies with regulations. Remove definitional and regulatory language from policies e.g. Policy 1d regarding permitted and conditionally permitted agricultural practices.	Cities of Cashmere, Entiat, Leavenworth and Wenatchee: Same as County. City of Chelan: Policies are required. A potential source of policies is the Comprehensive Plan where policies are compatible with SMP guidelines.

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		<p>plan.</p> <ul style="list-style-type: none"> • Utilities and Roads: Address preference for water oriented utilities. Address avoiding shoreline locations for new roads unless infeasible. Address minimizing environmental and visual impacts of parking. • Recreation: Coordinate with adopted parks and recreation plans. <p>Partially Consistent (B) Address RCW 90.58.100: Consistent with requirements to address economic development, public access, recreation, uses, conservation, historic/cultural, and other local topics such as agriculture and rehabilitation. Lacking flood damage element.</p> <p>Partially Consistent (C) Environment Designation Policies: Policies and regulations are provided for each designation, although not to the extent required by current WAC standards. See below.</p> <p>Partially Consistent Preferred Uses: Preferred use goals included on page 2 omit one from 90.58.020 - #7. Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary.</p> <p>City of Chelan - Not Consistent. Not included.</p>		
<p>Regulations: (A) are sufficient in scope and detail to ensure the implementation of SMA, SMP guidelines, and SMP policies; (B) include environment designation regulations; (C) include general regulations, use regulations that address issues of concern in regard to specific uses, and shoreline modification regulations; and, (D) are consistent with constitutional and other legal limitations on the regulation of private property. WAC 173-26-191(2)(a)(ii)</p>	<p>County: Pages 21 to 72</p> <p>Cities of Cashmere, Chelan, Entiat, Leavenworth and Wenatchee: Pages 21 to 44</p>	<p>Partially Consistent: Regulations for many uses are less detailed than the associated policies. Exemptions are similar to but out of date compared to SMA (e.g. fair market value). Regulations address many but not all of the shoreline uses and activities and mitigation (e.g. mixed uses; critical areas). Definitions are incomplete to address more modern uses, and/or out of date. Measurement methods do not match zoning code measurements (e.g. setbacks; see Section 4); determine if measurements can be the same or should be unique. Standards require review to ensure preferences for water oriented uses and no net loss of ecological protection. Private property rights are addressed in policies (Section 18) and a little in regulations (Section 2.2).</p>	<p>Consistency: Update as identified with consistency analysis.</p> <p>Other Recommendations: Reorganize regulations, such as uses and development standards into tables.</p>	<p>Cities of Cashmere, Chelan, Entiat, Leavenworth and Wenatchee: Same as County.</p>
ENVIRONMENT DESIGNATIONS				
<p>Each environment designation includes: Purpose statements, classification criteria, management policies, and regulations (types of shoreline uses permitted, conditionally permitted, and prohibited; building or structure height and bulk limits, setbacks, maximum density or minimum frontage requirements, and site development standards). WAC 173-26-211(2)(4).</p>	<p>Not entirely included in the current SMP.</p>	<p>Partially Consistent: The existing SMP does not include purpose statements or classification criteria (although definitions are provided) for each environmental designation. Policies and regulations are provided for each designation, although not to the extent required by current WAC standards.</p>	<p>Consistency: A discrete Environment Designation chapter could be added to the SMP that outlines for the County and each City their tailored environment designations, with new or expanded purpose, criteria, policies and regulations.</p> <p>Other Recommendations: The new chapter could include a matrix that outlines permit level for each shoreline use and modification by environment designation. The new chapter could also include a matrix that outlines appropriate development standards for each use by environment designation. It is expected that the County and each City would have different environment designation systems, permit matrices, and development standards matrices based on level of integration with existing Critical Areas Regulations (County) and local conditions (as presented in Chapters 4 and 5 of this report) and plans.</p>	
<p>An up-to-date map accurately depicting environment designation boundaries on a map. If necessary, include</p>	<p>The current SMP includes a map titled "Shoreline</p>	<p>Consistent: Although the current SMP is consistent with the WAC requirement for a map, the map will need to be updated.</p>	<p>The Environment Designation map(s) will be updated consistent with the final assessment of jurisdictional waterbodies and the specific environment designation</p>	

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
common boundary descriptions. WAC 173-26-211(2)(b); WAC 173-26-110(3);	Environment Map of Chelan County” showing all shorelines and corresponding environment designations. Environment boundary descriptions, including section township, and range descriptions, can be found in Appendix A.		systems developed for the County and each City.	
Statement that shorelines that are not mapped or not designated² are automatically assigned a conservancy environment designation until the shoreline can be redesignated through a master program amendment. WAC 173-26-211(2)(e).	Not stated outright in the current SMP.	Not Consistent	This statement will be added to the SMP.	
Natural environment. WAC 173-26-211(5)(a)				
Designation criteria: Shorelines that are ecologically intact and performing functions that could be damaged by human activity, of particular scientific or educational interest, or unable to support human development without posing a safety threat. WAC 173-26-211(5)(a)(iii)	The Natural environment designation is defined, albeit slightly different than required, in section 7.2.280.6.	Partially Consistent: The current SMP defines the Natural Environment as “ <i>An area containing some unique or cultural features considered valuable in a natural or original condition which are relatively intolerant of intensive human uses.</i> ”	<p>While this definition does not necessarily conflict with the WAC definition, it could be replaced with the WAC definition to provide a more complete definition that is consistent with terminology and concepts in use today. Expansion of the definition to specifically include areas valuable for their “scientific or educational interest” may also be useful in protection of areas that may not otherwise be ecologically intact, but should be preserved.</p> <p>The assignment of the Natural designation as illustrated in the current SMP map should be revisited to evaluate consistency of any existing developments and existing conditions with the expanded criteria to determine if that designation is still appropriate. Further, assignments of Natural environment will need to be made as appropriate to the added jurisdictional streams and lakes, including those on federal lands. Much, but not all, of the federal ownership may be appropriate for Natural designation (particularly Wilderness or other non- to limited harvest areas), Rural Conservancy designation (see below), or a newly created Natural Resource designation. For management and implementation purposes, it may be best to assign federal lands a unique environment designation, as application of the SMP to federal lands is unique and to avoid confusion related to the County’s critical areas regulations establishment of buffers for four shoreline environments (Urban, Rural, Natural, and Conservancy).</p>	
Prohibition on new: uses that would substantially degrade ecological functions or natural character of shoreline. WAC 173-26-211(5)(a)(ii)(A)	Not stated outright in current SMP.	Not Consistent: Closest statement: Shoreline goal 2. - <i>Protect against adverse effects to the public health, the land, its vegetation and wildlife, and the waters and their aquatic life within Chelan County.</i> (City of Chelan SMP does not include Goals)	Development of the permit matrix and accompanying environment-specific regulations, as well as use and modification regulations, would be the appropriate locations to clearly spell out these prohibitions.	

² This appears to mean that unmapped shorelines that qualify for regulation under the SMP would have a “default” SMP use environment of Conservancy until they can be designated through a formal amendment process. A similar example is the City of Everett’s SMP which indicates the following in Section 4.2: “Any areas within shoreline jurisdiction that are not mapped and/or designated are automatically assigned the category of the contiguous shoreline environment designation until the shoreline can be redesignated through a master program amendment. In addition, any property shown in shoreline jurisdiction that does not meet the criteria for shoreline jurisdiction (e.g., is more than 200 feet from the ordinary high water mark or floodway, is no longer in floodplain jurisdiction as documented by a Letter of Map Revision from FEMA, and does not contain associated wetlands) shall not be subject to the requirements of this Shoreline Master Program. Note that the actual location of the ordinary high water mark, floodplain boundaries, and wetland boundaries must be determined at the time a development is proposed.”

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
Commercial uses; industrial uses; nonwater oriented recreation; roads, utility corridors, and parking areas. WAC 173-26-211(5)(a)(ii)(B)	Commercial (17.4), Industrial (20.4.1), Utilities (25.1.1), Recreation (28.4.1), Roads & Parking (28.4.2)	Partially Consistent: Commercial development; ports and industries; and roads and parking areas are not allowed in the Natural environment. Low intensity recreational uses (campgrounds, trails) and utilities are allowed in the Natural environment.		
development or significant vegetation removal that would reduce the capability of vegetation to perform normal ecological functions. WAC 173-26-211(5)(a)(ii)(G)	Not stated outright in the current SMP.	Partially Consistent: Closest statement: Shoreline goal 2. - Protect against adverse effects to the public health, the land, its vegetation and wildlife, and the waters and their aquatic life within Chelan County.		
subdivision of property in a configuration that will require significant vegetation removal or shoreline modification that adversely impacts ecological functions. WAC 173-26-211(5)(a)(ii)(G)	Not stated outright in the current SMP.	Not Consistent: Closest statement: Land Use Policy 5.a – All subdivisions should be designed ... to minimize probabilities of damage to life, property and the environment. 5.b. – Cluster development should be encouraged ... to minimize disruption of the natural shoreline. (City of Chelan SMP does not include Policies)		
For single family residential development: limits on density and intensity to protect ecological functions, and requirement for CUP. WAC 173-26-211(5)(a)(ii)(C)	Section 16.4.2.a.	Partially Consistent: Minimum lot area of 1 acre is required for single-family residences in the Natural environment. However, a CUP is not required for such uses.	Revisit the density/intensity limitations to assess if they are sufficiently protective, and add a CUP requirement.	
For commercial forestry: requirement for CUP, requirement to follow conditions of the State Forest Practices Act. WAC 173-26-211(5)(a)(ii)(D)	Not stated outright in the current SMP.	Partially Consistent: Forest Management is subject to State Forest Practice Regulations in the Natural Environment. No CUP is required. However, harvest is permitted only in certain circumstances that are generally consistent with maintenance and preservation of ecological function.	Although the current SMP may be as equally or more protective of shoreline ecological function than the WAC in the Natural environment, the permit requirement on shorelines of statewide significance should be increased to CUP for consistency with the Guidelines.	
For agriculture: low intensity use allowed if subject to appropriate limits or conditions to assure that the use does not expand or practices don't conflict with purpose of the designation. WAC 173-26-211(5)(a)(ii)(E)	Section 12.4.1	Consistent: Non-commercial agricultural may be permitted on Natural shorelines, provided that its operation do not have a harmful ecological impact and that no extensive clearing, construction or other operation which substantially changes the character of the Environment is necessary.	No change needed.	
Low intensity public uses such as scientific, historical, cultural, educational research uses, and water-oriented recreational access allowed if ecological impacts are avoided. WAC 173-26-211(5)(a)(ii)(F)	Not stated outright in current SMP.	Partially Consistent: Closest statement: Section 28.4.1 – Very low intensity, diffuse recreational uses, such as primitive campgrounds, trails and hunting areas, etc., may be permitted on Natural shorelines.	The general principle of low-intensity use is present in the current SMP, but should be expanded to accommodate other low-intensity uses listed in the WAC when ecological impacts can be avoided.	
Rural conservancy. WAC 173-26-211(5)(b)				
Designation criteria: areas outside municipalities or UGAs with: (A) low-intensity, resource-based uses, (B) low-intensity residential uses, (C) environmental limitations such as steep banks or floodplains, (D) high recreational or cultural value, or (E) low-intensity water-dependent uses. WAC 173-26-211(5)(b)(iii)	The current SMP does not contain a Rural Conservancy designation. It does, however, contain a Rural designation.	Not Consistent: Definition of Rural Environment (Section 7.2.280.4) – An area characterized by intensive agricultural and recreational uses and those areas having a high capability to support active agricultural practices and intensive recreational development.	In order to maintain consistency with environment designation-specific buffers established in the Critical Areas Regulations, it is recommended that the Rural name be maintained, but that the purpose, policies, criteria, and regulations be updated using Ecology's Rural Conservancy language.	Not applicable to Cities or their UGAs.
Restrictions on use and development that would degrade or permanently deplete resources. Water-dependent and water-enjoyment recreation facilities are preferred uses. Low intensity, water-oriented commercial and industrial uses limited to areas where those uses have located in the past or at sites that possess conditions and services to support the development. WAC 173-26-211(5)(b)(ii)(A) and (B)	Not stated outright in current SMP.	Partially Consistent: Closest statements: Section 17.2 – Commercial development in the Rural Environment shall be prohibited except for those defined as water dependent and water related... Section 19.2.1 – Marinas and boathouses which can be sited, designed and built in such a way as to minimize conflicts with other uses of Rural shorelines may be permitted on Rural Shorelines. Section 20.2.1 – Ports or water dependent industries may be	The general principles for restriction of certain uses outlined in the WAC are present in various sections of the SMP. Development of the permit matrix and accompanying environment-specific regulations, as well as use and modification regulations, would be the appropriate locations to more clearly spell out these restrictions.	NA

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		<i>permitted on Rural shorelines... provided the development is proposed for a lot which is zoned industrial.</i> Section 28.2 – <i>Medium intensity recreational uses such as golf courses, fully developed campgrounds, swimming beaches, picnic facilities, etc., may be permitted on Rural shorelines.</i>		
For SMPs that allow mining, see WAC 173-26-241(3)(h).	Current SMP does not address two purposes for mining outlined in WAC.	Partially Consistent: Section 15.2 – <i>Mining operations may be permitted in the Rural Environment.</i> While it is true that mining may be an appropriate use in some sites in the Rural environment, provided the activity is consistent with standards in the mining use section of the Guidelines and is located in designated mineral resource lands, the current SMP does not include the necessary requirements and stipulations.	The permit matrix described above could still allow mining in this environment. However, provisions should be added to the SMP in the Mining use section that appropriately limit the locations where mining may occur and the manner in which it occurs in the Rural environment.	NA
Prohibition on new structural shoreline stabilization and flood control works except where there is documented need to protect an existing primary structure (provided mitigation is applied) or to protect ecological functions. WAC 173-26-211(5)(b)(ii)(C).	Not stated outright in current SMP.	Not Consistent: Closest statements: Section 21.2 – <i>Shoreline works and structures may be permitted on Rural shorelines ... provided they do not substantially change the character of the environment and are part of a project defined as water dependent or water related.</i> Section 21.2.2 – <i>Channelization of stream courses is prohibited except as provided in RCW 90.58.030(3)(e).</i>	The current SMP appears to allow new shoreline stabilization in tandem with a new water-dependent or water-related project, rather than to protect only existing structures or ecological functions. The regulation, however, may be applied as the WAC intends. Regardless, this section should be clarified and tightened to meet the WAC requirements.	NA
Development standards for residential use that preserve existing character of the shoreline. Density, lot coverage, vegetation conservation and other provisions that ensure no net loss of shoreline ecological functions. Density or lot coverage limited to a maximum of ten percent total impervious surface area within the lot or parcel, or alternative standard that maintains the existing hydrologic character of the shoreline. (May include provisions allowing greater lot coverage for lots legally created prior to the adoption of a master program prepared under these guidelines, if lot coverage is minimized and vegetation is conserved.) WAC 173-26-211(5)(b)(ii)(D).	Section 16.2	Not Consistent: Residential development in the Rural environment appears to be treated the same as residential development in the Urban environment, without special regard for preservation of “existing character” or ecological function. Lot coverage is deferred to the underlying zoning.	Develop specific residential standards for the Rural environment consistent with the WAC requirements included in both the Rural Conservancy and portions of the Shoreline Residential (low-intensity residential development outside of LAMIRDs) sections of the Guidelines. Evaluate the zoning standards governing lot coverage.	NA
Aquatic. WAC 173-26-211(5)(c)				
Designation criteria: Areas waterward of the ordinary high-water mark (OHWM). WAC 173-26-211(5)(c)(iii)	Aquatic is not a designated environment in the current SMP.	Not Consistent: Uses and modifications occurring waterward of the ordinary high water mark are considered in several sections of the SMP, including Section 13, 15, 19, 21, 21a, 23, and 28.	Add an Aquatic Environment designation, including purpose statements, designation criteria, management policies, and regulations.	
New over-water structures: allowed only for water-dependent uses, public access, or ecological restoration. WAC 173-26-211(5)(c)(ii)(A)	Not stated outright in the current SMP.	Partially Consistent: Closest statement: Section 21.A.5.1 – <i>Piers and docks shall be permitted for water dependent and water related uses or for multiple use facilities if the majority use</i>	Update as identified with consistency analysis.	

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
limited to the minimum necessary to support the structure's intended use. WAC 173-26-211(5)(c)(ii)(B)		<i>is water dependent or related and access can safely be provided. Maximum size of the pier or dock shall be no greater than necessary to serve the intended use...</i>		
Multiple use of over-water facilities encouraged. WAC 173-26-211(5)(c)(ii)(C)	Scattered statements in policy 10.g and Section 21.1.3	Consistent: Closest statements: Policy 10.g – <i>Encouragement should be given to the cooperative use of docks rather than a proliferation of single purpose private docks in order to minimize disruption of shorelines and reduction of usable water surface.</i> Section 21.1.3 – <i>Joint use dock facilities shall be required for any subdivision, multi-family residences, or commercial and industrial enterprises in close proximity to each other...</i>	No change needed, except organizationally it may be most efficient to make a general statement about multiple use in the Aquatic section of a new environment designation chapter.	
Location and design of all developments and uses required to: minimize interference with surface navigation, to consider impacts to public views, and to allow for the safe, unobstructed passage of fish and wildlife, particularly those species dependent on migration. WAC 173-26-211(5)(c)(ii)(D) prevent water quality degradation and alteration of natural hydrographic conditions. WAC 173-26-211(5)(c)(ii)(F)	Not stated outright in the current SMP.	Not Consistent: Closest statement: Section 21.1.1 – <i>The portions of the criteria governing the design of bulkheads, landfills, and marinas for the protection of fish and shellfish resources adopted by the Washington State Department of Fisheries, 1971, may be utilized in preparation of conditions granting a permit.</i> Other scattered regulations address particular development elements that might impact water quality or appearance of the development (indirect reference to view issues).	Because a discrete Aquatic section is lacking, a number of sections that include in- or over-water work have statements that indirectly address one or more of the WAC requirement provisions. Addition of a discrete Aquatic section will allow development of a clear body of policies and regulations that apply to all over-water or in-water work, which will eliminate repetition of these basic provisions in each use or modification section that might include such work.	
Uses that adversely impact ecological functions of critical saltwater and freshwater habitats limited (except where necessary for other SMA objectives, and then only when their impacts are mitigated). WAC 173-26-211(5)(c)(ii)(E)	Not stated in the current SMP.	Not Consistent	Again, a discrete Aquatic section would be the appropriate place to include general stipulations that apply to a variety of uses and modifications that include in- or over-water work components.	
High-intensity. WAC 173-26-211(5)(d)				
Designation criteria: Areas within incorporated municipalities, "UGAs," and "rural areas of more intense development" (see RCW 36.70A.070) that currently support or are planned for high-intensity water-dependent uses. WAC 173-26-211(5)(d)(iii)	The current SMP does not contain a High Intensity designation. It does, however, contain an Urban designation.	Not Consistent: Definition of Urban Environment (Section 7.2.280.3) – <i>An area of high intensity land use including residential, commercial, and industrial development in addition to open space and public uses.</i>	Because of the County's establishment of shoreline buffers by environment designation in its recently adopted updated critical areas regulations, continued use of the Urban designation is recommended. The County's Urban environment designation is a catch-all for residential, commercial and industrial uses. The definition, purpose, goals, policies and regulations of the Urban environment could utilize the WAC's language for its High Intensity environment, combined with appropriate parts of the WAC's language for Shoreline Residential environment (to apply to LAMIRDs outside of UGAs). This environment would be expected to apply in the County (outside Cities and their UGAs) in very few places.	None of the Cities' critical areas regulations are tied to shoreline environments, which simplifies environment designation development compared to the County. As previously mentioned, the Urban environment designation is a catch-all for residential, commercial and industrial uses. Under the current SMP, the Urban environment appears to be applied to the full extent of the City and the UGAs. This update is an opportunity to recognize the variable conditions within each City, applying a High Intensity classification to specific areas within each City/UGA that meet the WAC definition. It is recommended that the Guideline's definition, purpose, criteria, goals and policies for the High-Intensity environment designation be adopted for use in each City as appropriate, with modifications made as needed to reflect local goals, needs and conditions.

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
				The name of that designation is a point for discussion. Several of the Cities, including Chelan, Entiat, and Wenatchee, have special waterfront zones (Waterfront Commercial, Waterfront Mixed Use, Waterfront Business), the names of which better capture the purpose and intent of the High-Intensity designation with respect to the water-orientation of allowed uses in that zone. Those names could either be used directly or some variant based on those names could be developed to avoid confusion with the respective Cities' Comprehensive Plan designations.
Priority given first to water-dependent uses, then to water-related and water-enjoyment uses. New non-water oriented uses prohibited except as part of mixed use developments, or where they do not conflict with or limit opportunities for water oriented uses or where there is no direct access to the shoreline. WAC 173-26-211(5)(d)(ii)(A)	Not stated outright in the current SMP.	Partially Consistent: Closest statement: Policy 9.d – Industries are an appropriate land use along shorelines in which such use would be compatible with existing zoning regulations and land use plans, however priority should be given to water dependent and/or water related industries.	Update as identified with consistency analysis. A clear hierarchy of preferred uses should be outlined.	
Full use of existing urban areas required before expansion of intensive development allowed. WAC 173-26-211(5)(d)(ii)(B) ³	Not included in the current SMP.	Not Consistent	Update as identified with consistency analysis.	
New development does not cause net loss of shoreline ecological functions. Environmental cleanup and restoration of the shoreline to comply with relevant state and federal laws assured. WAC 173-26-211(5)(d)(ii)(C)	Not stated outright in the current SMP.	Partially Consistent: Closest statements: Overall Shoreline Goal 5 – <i>Maintain or recreate a high quality of environment along the shorelines of the County.</i> Overall Shoreline Goal 6 – <i>Preserve and protect fragile natural resources and culturally significant features.</i> Section 9.1 – <i>All shoreline permit applications must include provisions for the restoration of wetlands which might be altered by the proposed project unless the alteration of the wetland is a specific and permitted part of the proposed project. Restoration of altered wetlands shall include but is not limited to replanting of native vegetation and interim maintenance to enhance growth of native vegetative cover. (see wetland definition below)</i>	Update as identified with consistency analysis.	
Visual and physical public access required where feasible. Sign control regulations, appropriate development siting, screening and architectural standards, and maintenance of natural vegetative buffers to achieve aesthetic objectives. WAC 173-26-211(5)(d)(ii)(D) and (E)	Not stated outright in the current SMP.	Partially Consistent: Closest statement: Specific Goals for Shorelines of Statewide Significance – <i>increase public access to publicly owned areas of shorelines where increased use levels are desirable.</i> Goals for the Master Program Elements B. – <i>Assure safe, convenient and diversified access to public shorelines; assure that the intrusion created by public access will not endanger life or have adverse effects on property or</i>	Update as identified with consistency analysis. Public access is a primary goal of the County and Cities. Further discussion will be needed to assess the extent and the nature of required public access/recreation required of uses in this environment.	

³ The full section of the Guidelines states: "Full utilization of existing urban areas should be achieved before further expansion of intensive development is allowed. Reasonable long-range projections of regional economic need should guide the amount of shoreline designated "high-intensity." However, consideration should be given to the potential for displacement of nonwater-oriented uses with water-oriented uses when analyzing full utilization of urban waterfronts and before considering expansion of such areas." This appears to mean that areas designated with the use environment "High Intensity" should be fully utilized before considering expanding this use environment through future amendments.

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		<i>fragile natural features; assure that the provision for public access will minimize conflicts between the public and private property.</i> The current SMP contains some general policy statements and regulations (e.g., sign and landscape standards) related to physical and visual public access, but no specific or comprehensive approach to public access provisions in a discrete section.		
Urban conservancy. WAC 173-26-211(5)(e)				
Designation criteria: Areas within incorporated municipalities, UGAs, and rural areas of more intense development that are not suitable for water-dependent uses and that are either suitable for water-related or water-enjoyment uses, are flood plains, have potential for ecological restoration, retain ecological functions, or have potential for development that incorporates ecological restoration. WAC 173-26-211(5)(e)(iii)	The current SMP does not contain an Urban Conservancy designation or a similar alternative.	Not Consistent.	In the County, the existing environment designations that best cover Urban Conservancy uses are likely Urban or Rural, discussed above under High Intensity and Rural Conservancy. Ecology's Urban Conservancy classification might only apply to a few LAMIRDs. As necessary, the uses/standards outlined by the Guidelines (and listed briefly below) for the Urban Conservancy environment could be distributed with modifications to the County's Urban or Rural environments.	Establishing a new Urban Conservancy environment is recommended for the Cities and UGAs, using the WAC language with modifications as needed to reflect local goals, needs and conditions. In the Cities, the types of land uses that might be best suited to this designation are certain parks/public lands and education/recreation facilities. For example, the golf course shoreline area in Leavenworth, most of the waterfront parks in Wenatchee, and the future Entiat Outdoor Learning Center in Entiat. These types of existing and planned uses are very compatible with restoration efforts, and the level of development associated with these types of uses often retains certain ecological functions. Other sensitive lands (floodplains, CMZ, etc) may also be appropriate for the Urban Conservancy designation.
Allowed uses are primarily those that preserve natural character of area, promote preservation of open space, floodplain or sensitive lands, or appropriate restoration. WAC 173-26-211(5)(e)(ii)(A) Priority given to water-oriented uses over non-water-oriented uses. For shoreline areas adjacent to commercially navigable waters, water-dependent uses given highest priority. WAC 173-26-211(5)(e)(ii)(D) For SMPs that allow mining, see WAC 173-26-241(3)(h).	The current SMP does not contain an Urban Conservancy designation or a similar alternative. Therefore, this criterion is not included in the current SMP.	Not Consistent.	NA	Update consistent with the Guidelines. A clear hierarchy of preferred uses should be outlined in both the designation-specific regulations, and through assignments in the permit matrix. A number of shoreline uses and modifications that may be suited for a High-Intensity environment or its equivalent are expected to be prohibited in the Urban Conservancy environment, or CUPs required rather than SDPs for certain other uses and modifications. Active mining is only occurring along the City of Entiat waterfront. No other mining activity is occurring or expected to occur in the other Cities or their UGAs. Discussion will be needed with each City regarding whether a CUP should be

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
				required for mining or if it should be prohibited.
Standards for shoreline stabilization measures, vegetation conservation, water quality, and shoreline modifications that ensure new development does not result in a net loss of shoreline ecological functions or degrade other shoreline values. WAC 173-26-211(5)(e)(ii)(B)	The current SMP does not contain an Urban Conservancy designation or a similar alternative. Therefore, this criterion is not included in the current SMP.	Not Consistent.	NA	Update those SMP sections as outlined by the Guidelines, with appropriate specific regulations for this environment designation.
Public access and recreation required where feasible and ecological impacts are mitigated. WAC 173-26-211(5)(e)(ii)(C)	The current SMP does not contain an Urban Conservancy designation or a similar alternative. Therefore, this criterion is not included in the current SMP.	Not Consistent.	NA	Update as outlined by the Guidelines. Public access is a primary goal of each City and its residents. Further discussion will be needed to assess the extent and the nature of required public access/recreation required of uses in this environment.
Shoreline residential WAC 173-26-211(5)(f)				
Designation criteria: Areas within incorporated municipalities, Urban Growth Areas (UGAs), “rural areas of more intense development,” and “master planned resorts” (see RCW 36.70A.360) that are predominantly residential development or planned and platted for residential development. WAC 173-26-211(5)(f)(iii)	The current SMP does not contain a Shoreline Residential designation. It does, however, contain an Urban designation, which is primarily used for those areas containing residential uses.	Not Consistent: Definition of Urban Environment (Section 7.2.280.3) – <i>An area of high intensity land use including residential, commercial, and industrial development in addition to open space and public uses.</i> Residential uses are also allowed in the Rural, Conservancy, and Natural environments subject to stricter regulations.	In the County, the existing environment designation that best covers clusters of Shoreline Residential uses is Urban. In the County, Ecology’s Shoreline Residential classification might only apply to a few LAMIRDs. As necessary, the uses/standards outlined by the Guidelines (and listed briefly below) for the Shoreline Residential environment could be distributed with modifications to the County’s Urban environment. More isolated residential developments could be accommodated in other environments.	Establishing a new Shoreline Residential environment is recommended for the Cities and UGAs, using the WAC language with modifications as needed to reflect local goals, needs and conditions. It may be a point of discussion with the Cities to visit whether Shoreline Residential should be split into separate single-family and multi-family designations. Distinctions between the two uses could be made in the residential regulations, but depending on the extent of differential treatment, it might be simplest to have different designations. For example, development standards (e.g., height, coverage, setbacks/buffers), requirements for public access, signage, etc. might be substantially different for each.
Standards for density or minimum frontage width, setbacks, buffers, shoreline stabilization, critical areas protection, and water quality protection assure no net loss of ecological function. WAC 173-26-211(5)(f)(ii)(A)	The current SMPs address to some degree density, setbacks, minimum frontage width and shoreline stabilization for residential uses. City and County versions vary with respect to setback determination mechanism.	Partially Consistent: Section 16.3.2.a – <i>Minimum lot area shall be specified in the [applicable] zoning resolution.</i> (Conservancy Environment) Section 16.4.2.a – <i>Minimum lot area shall be one acre.</i> (Natural Environment) Section 7.2.170 - <i>A setback from the OHWM is determined by averaging the setbacks of structures existing on waterfront lots which are adjacent...</i> Section 16.3.2.b – <i>Minimum lot width at the property line nearest the high water line shall be 100 feet.</i> (Conservancy Environment) Section 16.4.2.b - <i>Minimum lot width at the property line nearest</i>	See above.	Although some dimensional standards are set by the current SMP for residential uses, the setbacks based strictly on the rear-yard setback as established in zoning with a possible reduction to a 0-foot setback due to steep slopes may not be adequate for assuring no net loss of ecological function. New Shoreline Residential dimensional standards will need to be established, as well as environment-specific provisions addressing shoreline stabilization and

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		<i>ordinary high water mark shall be 200 feet. (Natural Environment)</i>		water quality. See discussion below related to critical areas.
Multifamily and multi-lot residential and recreational developments provide public access and joint use for community recreational facilities. WAC 173-26-211(5)(f)(ii) (B)	Not stated outright in the current SMP.	Not Consistent: Closest statement: Policy 5.i – <i>Subdividers should be encouraged to provide pedestrian access to the shoreline within the development...</i>	See above.	Update as outlined by the Guidelines. The “encourage” policy should be converted to a mandatory regulation and expanded to cover other developments in addition to subdivisions. Public access is a primary goal of each City and its residents. Further discussion will be needed to assess the extent and the nature of required public access/ recreation required of uses in this environment.
Access, utilities, and public services required to be available and adequate to serve existing needs and/or planned future development. WAC 173-26-211(5)(f)(ii)(C)	Not stated outright in current SMP.	Partially Consistent: Closest statement: Policy 5.g – <i>Encourage residential development in areas presently having such improvements as utilities and streets so as to minimize additional expenditures of public funds, optimize use of existing public facilities, and not decrease availability of open space.</i>	See above.	Update as outlined by the Guidelines. The “encourage” policy should be converted to a mandatory regulation.
Commercial development limited to water-oriented uses. WAC 173-26-211(5)(f)(ii)(D)	Not stated outright in current SMP.	Partially Consistent: Closest statement: Policy 6.a – <i>Commercial developments which provide an opportunity for substantial numbers of people to enjoy the amenities of the shoreline should be encouraged to locate near the water. All other commercial developments should be encouraged to locate upland.</i>	See above.	Update as outlined by the Guidelines. In addition to policies and regulations, the permit matrix could identify a CUP requirement for water-oriented commercial developments and prohibit non-water-oriented commercial developments in this environment.
GENERAL POLICIES AND REGULATIONS				
Archaeological and Historical Resources. WAC 173-26-221(1)				
Developers and property owners required to stop work and notify the local government, State office of archaeology and historic preservation and affected Indian tribes if archaeological resources are uncovered during excavation. WAC 173-26-221(1)(c)(i)	County: Pages 61-62, Section 27 All Cities: Page 36, Section 27	Partially Consistent: Section 27.4 should be expanded to require notification to state and tribal agencies in addition to local governments. Notification should be required of property owners as well as developers.	Consistency: Update per consistency analysis.	Same as County.
Permits issued in areas documented to contain archaeological resources require site inspection or evaluation by a professional archaeologist in coordination with affected Indian tribes WAC 173-26-221(1)(c)(ii)	Chelan County: Pages 61-62, Section 27 All Cities: Page 36, Section 27	Consistent: Shoreline permits may be postponed based on need for investigation by professional archaeologist or historian.	Other Recommendations: Update wording to modernize how permit process is conducted, e.g. rather than “postpone” for investigation, require submittal of study as part of complete application for known sites.	Same as County.
Policies and regulations for critical areas (designated under GMA) located within shorelines of the State: (i) are consistent with SMP guidelines, and (ii) provide a level of protection to critical areas within the shoreline area that is at least equal to that provided by the local government’s existing critical area regulations adopted pursuant to the GMA for comparable areas other than shorelines. WAC 173-26-221(2)(a) and (c) Planning objectives are for protection <i>and restoration</i> of degraded ecological functions and ecosystem-wide processes. Regulatory provisions protect existing	Not directly addressed.	Not Consistent - Critical Areas: Passing reference is made to wetlands, fish and wildlife areas, erosions areas, and flood hazards in policies and regulations (e.g. policy 10.a; except in City of Chelan which does not have policies). However, the terms, definitions, and standards are not equivalent to the critical areas regulations. Not Consistent - Restoration: Restoration is addressed in Goal I (except in City of Chelan which does not have goals) and addressed briefly in some policies and regulations, though not to the extent required by WAC guidelines. Integration with WRIA policies and programs is recommended.	Consistency: Address incorporation of critical areas per Shoreline Inventory and Analysis; address restoration in SMP proposal later in update process.	Same as County.

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
ecological functions and ecosystem-wide processes. WAC 173-26-221(2)(b)(iv) Critical area provisions promote human uses and values , such as public access and aesthetic values, provided they do not significantly adversely impact ecological functions. WAC 173-26-221(2)(b)(v)				
If SMP includes optional expansion of jurisdiction: Clear description of the inclusion of any land necessary for buffers of critical areas that occur within shorelines of the State, accurately depicting new SMP jurisdiction consistent with RCW 90.58.030(2)(f)(ii) and WAC 173-26-221(2)(a).	Not applicable.	Not applicable per Jurisdiction analysis.	Not applicable per Jurisdiction analysis.	Not applicable per Jurisdiction analysis.
Critical Areas Regulations			The County has recently updated its CAO, which is anticipated to be referenced by the updated SMP. The approach for inclusion of critical areas regulations for each City may vary. More recently updated CARs may be referenced in the SMP, with no or only a few changes to substantive sections. For older CAOs it may be easiest to append the existing CAO to the SMP and then make the changes necessary directly in the appended CAO. Where changes to the CAO may be substantial to meet Guidelines criteria, this approach may be more user-friendly.	
Wetlands. WAC 173-26-221(2)(c)(i)				
Wetlands definition are consistent with WAC 173-22.	Wetland definition is found in Section 7.2.810.	Not Consistent in SMP: The definition is not consistent with the WAC. Section 7.2.810 states: <i>Those lands extending landward for two hundred horizontal feet from the ordinary high water mark on all Shorelines of the State, or the landward edge of the 100 year floodplain, whichever distance is greater. This term also includes submerged lands.</i> This wetland definition is actually an attempt to describe shoreline jurisdiction, which has caused some confusion and potentially inconsistencies in implementation by the County and Cities.	In the SMP definitions section, use Ecology's most recent definition of wetlands as found in WAC 173-22-030(19). A description of shoreline jurisdiction should be provided clearly elsewhere, not in the definitions section and not in the wetland definition. The current County and Cities of Entiat and Cashmere CAOs contain a wetlands definition consistent with the WAC. The Cities of Chelan, Leavenworth and Wenatchee contain abbreviated or otherwise different definitions.	
Provisions requiring wetlands delineation method are consistent with WAC 173-22-035.	Not included in the current SMPs.	Not Consistent in SMP. WAC 173-22-035 establishes that the method of delineation shall be the Department of Ecology's 1997 <i>Washington State Wetland Identification and Delineation Manual</i> (publication # 96-94). Ecology's manual builds on the 1987 Corps manual and subsequent changes and guidance issued by the Corps, as well as removing and adding language applicable to State-specific scenarios.	Consistent in CAO. The County's CAO provisions regarding delineation method are consistent with the Guidelines.	<ul style="list-style-type: none"> • Cashmere: CAO is consistent, specifies use of DOE 1997 manual • Chelan: CAO is not consistent, specifies use of 1989 Corps manual • Entiat: CAO is consistent, specifies most recent DOE manual • Leavenworth: CAO is not consistent, specifies 1987 Corps manual • Wenatchee: CAO is not consistent, specifies Corps manual (no date) The Cities identified as inconsistent should revise the CAO, or reference the CAO but include in the SMP that Ecology's 1997 delineation method must be used in shoreline jurisdiction.
Regulations address all uses and activities listed in WAC 173-26-221(2)(c)(i)(A) to achieve no net loss of wetland area and functions including lost time when the wetland does not perform the function. [WAC 173-26-221(2)(c)(i)(A) + (C)]	Not included outright in the current SMPs.	Not Consistent in SMP. Scattered references to wetlands protection are made in the various goal/policy sections and in a few regulations sections, but are generally missing for the listed uses and activities. Further, it is probable that many of the uses of the term "wetland" are actually meant to apply to shorelands	Consistent in CAO. The County's CAO provisions regarding no net loss of wetland area and functions are consistent with the Guidelines and other Ecology guidance. General	<ul style="list-style-type: none"> • Cashmere: Partially Consistent in CAO. The CAO applies to "all development activities within the city's incorporated limits. Any development authorized to alter the condition of any

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		in general (as evidenced by the wetland definition and at least one reference to an activity that is exempted by the WAC when constructed on wetlands, when the WAC exemption is for construction on shorelands). Specific or implied references to "no net loss of wetland area and functions" are lacking. However, the County CAO and a few of the City CARs completely or more fully address those uses and activities, and address no net loss targets. See Recommendations.	requirement for mitigation plan to address losses of area and function after applicant has demonstrated their mitigation sequencing steps. The regulations apply to all development, which is defined as: construction or exterior alteration of a structure or structures, dredging, drilling, dumping, filling, removal of natural resources or vegetation, placing of obstructions, any project of a permanent nature or changes in the use of land or preparation for the change of use of definition.	land, water or vegetation, or to alter or construct any building, structure or improvement." When impacts are approved, the mitigation report and plan are required to demonstrate "that there shall be no net loss of the ecological function of the wetland." Specific mention of wetland area and temporal loss are not included. <ul style="list-style-type: none"> • Chelan: Partially Consistent in CAO. The CAO applies to any project that requires a "commercial or residential building permit; grading or clearing permit; conditional use permit; planned development; shoreline substantial development permit; conditional use permit; subdivision; short subdivision; variance: rezone or any subsequently required permit or approval." The CAO further states that "No land surface modifications or alteration may take place and no improvement may be located in a regulated wetland except as specifically provided in this section." Specific mention of temporal loss and a "no net loss of wetland area and functions" goal are not included. • Entiat: Same as Cashmere above. • Leavenworth: Partially Consistent in CAO. The Leavenworth CAO provides a long list of uses to which the CAO applies, which is remarkably similar to the uses and activities listed in the WAC. A goal of the CAO is to "minimize loss of wetlands," but a clear policy goal of achieving "not net loss of wetland area and function" is not included. • Wenatchee: Similar to Chelan, the Wenatchee CAO applies to any development application. Specific goals or regulations to achieve "no net loss of wetland area and functions" are not included. Partially Consistent in CAO.
Wetlands rating or categorization system is based on rarity, irreplaceability, or sensitivity to disturbance of a wetland and the functions the wetland provides. Use Ecology Rating system or regionally specific, scientifically based method. WAC 173-26-	Not included in the current SMPs.	Not Consistent	The County's CAO provisions regarding wetland rating are consistent with the Guidelines and other Ecology guidance. The CAO requires use of Ecology's 2004 <i>Washington State Wetland Rating</i>	<ul style="list-style-type: none"> • Cashmere: Not consistent, CAO references the 1991 version of Ecology's rating form. • Chelan: Not consistent, CAO references the 1991 version of

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
221(2)(c)(i)(B)]			System for Eastern Washington— Revised.	<p>Ecology’s rating form.</p> <ul style="list-style-type: none"> • Entiat: Consistent, CAO references the “most recent publication” of Ecology’s rating form. • Leavenworth: Not consistent, CAO references the 1991 version of Ecology’s rating form. • Wenatchee: Not consistent, CAO references the 1991 version of Ecology’s rating form. <p>The Cities identified as inconsistent should revise the CAO, or reference the CAO but include in the SMP that Ecology’s 2004 wetland rating system must be used in shoreline jurisdiction.</p>
<p>Buffer requirements are adequate to ensure wetland functions are protected and maintained in the long-term, taking into account ecological functions of the wetland, characteristics of the buffer, and potential impacts associated with adjacent land uses. WAC 173-26-221(2)(c)(i)(D)</p>	Not included in the current SMPs.	Not Consistent	The County has recently updated its critical areas regulations under GMA based on best available science. The wetland buffers meet the requirements of the Guidelines.	<p>See Section 2.2 above for an accounting of current wetland buffers for each City. It is difficult to assess without conducting a full study whether buffers currently included in each City’s CAO are “adequate.” However, generally, best available science and Ecology precedent seem to show that buffers for different wetland categories in urban areas should fall within these ranges:</p> <p>Category I: 100-200 feet Category II: 100-200 Category III: 50-100 Category IV: 50</p> <p>Buffers for these categories are sometimes further partitioned by intensity of the proposed use and/or by habitat function score (1 component of the 3-component rating system). With that guidance in mind, the following outlines City CAO consistency with respect to adequate buffers:</p> <ul style="list-style-type: none"> • Cashmere: May be consistent • Chelan: Category I - III buffers may be consistent, but the Category IV buffers may need to be increased. Further, the buffer is allowed to be reduced by 50%, which exceeds the more commonly accepted new standard of 25%. • Entiat: Buffers for all categories of

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
				<p>wetland may need to be increased</p> <ul style="list-style-type: none"> • Leavenworth: the CAO provides a range of potential buffers for each wetland category. The high end of the range may be consistent for Categories I-III, but the low end of the range for all categories may need to be increased. • Wenatchee: May be consistent. However, the buffer is allowed to be reduced by 50%, which exceeds the more commonly accepted new standard of 25%. <p>The Cities identified as inconsistent should revise the CAO, or reference the CAO but include updated buffers in the SMP that must be used in shoreline jurisdiction.</p>
<p>Wetland mitigation requirements are consistent with WAC 173-26-201(2)(e) and which are based on the wetland rating. WAC 173-26-221(2)(c)(i)(E) and (F)</p>	<p>Not included in the current SMP.</p>	<p>Not Consistent.</p>	<p>The County's CAO provisions regarding mitigation sequencing are consistent with the Guidelines and other Ecology guidance.</p>	<ul style="list-style-type: none"> • Cashmere: Consistent, CAO requires mitigation of impacts and use/demonstration of mitigation sequencing. However, the listed mitigation sequence excludes "monitoring the impact." • Chelan: Consistent, the definition of "Mitigation" in the CAO includes the mitigation sequence and preference for applying those mechanisms in order. However, specific mention of mitigation requirements is not included in the wetlands section, nor is "monitoring the impact" included in the mitigation sequence. • Entiat: Consistent, CAO requires mitigation of impacts and use/demonstration of mitigation sequencing. • Leavenworth: Partially consistent, the definition of "Mitigation" includes the mitigation sequence and preference for applying those mechanisms in order. However, the definition skips from "reducing or eliminating the impact" to "monitoring the impact..." "Compensating for the impact..." is missing and should be added. • Wenatchee: Not consistent, the CAO does not mention mitigation sequencing or include specific

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
				requirements for mitigation of wetland impacts. These elements may need to be added. The CAO does include a requirement for "site analysis," and it is trusted that the qualified professional preparing the site analysis will include these elements appropriately.
<p>Compensatory mitigation allowed only after mitigation sequencing is applied and higher priority means of mitigation are determined to be infeasible. Compensatory mitigation requirements include (I) replacement ratios; (II) Performance standards for evaluating success; (III) long-term monitoring and reporting procedures; and (IV) long-term protection and management of compensatory mitigation sites. WAC 173-26-221(2)(c)(i)(F)</p> <p>Compensatory mitigation requirements are consistent with preference for "in-kind and nearby" replacement, and include requirement for watershed plan if off-site mitigation is proposed. WAC 173-173-26-201(2)(e)(B)</p>	Not included in the current SMP.	<p>Not Consistent. Closest statement: Section 9.1 – <i>All shoreline permit applications must include provisions for the restoration of wetlands which might be altered by the proposed project unless the alteration of the wetland is a specific and permitted part of the proposed project. Restoration of altered wetlands shall include but is not limited to replanting of native vegetation and interim maintenance to enhance growth of native vegetative cover.</i> (see wetland definition above)</p>	The County's CAO provisions regarding mitigation requirements are consistent with the Guidelines and other Ecology guidance.	<ul style="list-style-type: none"> • Cashmere: Partially consistent, the CAO references Ecology's 1991 rating form for guidance on mitigation ratios. This should be updated to reference Ecology's latest mitigation guidance. The CAO does require that the mitigation report include a monitoring plan. Requirements for performance standards, preference for in-kind mitigation, and long-term protection mechanisms are not specifically included in the CAO and should be added. • Chelan: Not consistent. The CAO takes a non-prescriptive approach, requiring a sensitive area study prepared by a qualified professional. The City trusts that the qualified professional preparing the site analysis will include these elements appropriately when necessary. Specific minimum requirements for mitigation reports and plans should be added. • Entiat: Partially consistent, the CAO references Ecology's 1991 rating form for guidance on mitigation ratios. This should be updated to reference Ecology's latest mitigation guidance. The CAO does require that the mitigation report include a monitoring plan and description of long-term protection mechanisms. Requirements for performance standards and preference for in-kind mitigation are not specifically included in the CAO and should be added. • Leavenworth: Not consistent. General and detailed wetland mitigation requirements are lacking and should be added consistent with the Guidelines. • Wenatchee: Not consistent, the CAO

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
				takes a non-prescriptive approach, requiring a site analysis prepared by a qualified professional. These elements may need to be added. It is trusted that the qualified professional preparing the site analysis will include these elements appropriately. The upcoming CAO update will require use of guidelines based on BAS, which will indirectly indicate use of Ecology's latest guidance.
Geologically Hazardous Areas. WAC 173-26-221(2)(c)(ii)				
Prohibition on new development (or creation of new lots) that would cause foreseeable risk from geological conditions during the life of the development prohibited. WAC 173-26-221(2)(c)(ii)(B) require structural shoreline stabilization over the life of the development. (Exceptions allowed where stabilization needed to protect allowed uses where no alternative locations are available and no net loss of ecological functions will result.) WAC 173-26-221(2)(c)(ii)(C)	Not included in the current SMP.	Not Consistent	The County's CAO contains detailed requirements for geotechnical and geologic reports that assess various risk factors. If the special studies, performance standards and any other mitigating measures are not able to reduce risks, then the project can be denied. Specific prohibition statements as outlined in the WAC could be added directly to the Critical Areas section of the SMP for clarity.	Each City's CAO contains detailed requirements for geotechnical and geologic reports that assess various risk factors. If the special studies, performance standards and any other mitigating measures are not able to reduce risks, then the project can be denied. Specific prohibition statements as outlined in the WAC could be added directly to the Critical Areas section of the SMP for clarity and consistency, avoiding the need for modification of the CAO.
New stabilization structures for existing primary residential structures allowed only where no alternatives (including relocation or reconstruction of existing structures) are feasible, and less expensive than the proposed stabilization measure, and then only if no net loss of ecological functions will result. WAC 173-26-221(2)(c)(ii)(D)	Not stated outright in the current SMP.	Not Consistent: Closest statement: Policy 10.c – <i>Construction of bulkheads should be permitted where they provide protection to marinas, upland areas, facilities, or natural features.</i>	Neither the current SMPs nor the geologically hazardous areas section of the CAOs specifically address this requirement. It could be added to the SMP Critical Areas section and reference the Shoreline Stabilization (or Shoreline Works and Structures) section of the SMP.	
Critical Saltwater Habitats. WAC 173-26-221(2)(c)(iii)	Not applicable in Chelan County	NA		
Critical Freshwater Habitats. WAC 173-26-221(2)(c)(iv)				
Requirements that ensure new development within stream channel, channel migration zone, wetlands, floodplain, hyporheic zone, does not cause a net loss of ecological functions. WAC 173-26-221(2)(c)(iv)(C)(I) and WAC 173-26-221(2)(c)(iv)(B)(II)	Not included in the current SMP.	Not Consistent in the SMP. County CAO: Partially consistent in the CAO. While not included in the SMP directly, the recent update of the County's CAO that will be referenced by the SMP includes provisions that protect wetlands, streams/lakes and their riparian areas, and floodplains. Specific mention of channel migration zones and hyporheic zones is not included in the CAO. City CAO: For evaluation of City CAO/SMP consistency with wetlands protection, see discussions above. The Cities' CAOs focus on the safety/insurance risk element of floodplain regulation, rather than floodplain functions. The Cities' CAOs also lack references to protection of hyporheic and channel migration zones.	Specific regulations regarding CMZs and hyporheic zones may need to be added to the Critical Areas section of the SMP (rather than amending the CAO directly), as well as WAC language regarding net loss of ecological functions.	Specific regulations regarding CMZs and hyporheic zones may need to be added to the Critical Areas section of the SMP (rather than amending the CAOs directly), as well as WAC language regarding net loss of ecological functions. Additional City analysis and recommendations: <ul style="list-style-type: none"> • Cashmere: Partially consistent. The City's CAO includes provisions that protect streams/lakes and their riparian areas. A "comprehensive habitat management and mitigation plan" is

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
				<p>required for any developments that contain habitat conservation areas.</p> <ul style="list-style-type: none"> • Chelan: Partially consistent. The City's CAO includes general provisions that protect streams/lakes and their riparian areas. The City's CAO requires submittal of a sensitive areas study, consultation with WDFW, and states that "uses and activities allowed within the fish and wildlife habitat conservation area shall be limited to low intensity land uses which will not adversely affect or degrade the habitat and which will not be a threat to the critical ecological processes such as feeding, breeding, resting, nesting and dispersal." However, specific protections such as buffers are not included in the CAO. While the provisions included in the CAO may result in consistency with the WAC in practice, it is difficult to evaluate without more specific standards. • Entiat: Partially consistent. The City's CAO includes provisions that protect streams/lakes and their riparian areas. A "comprehensive habitat management and mitigation plan" is required for any developments that contain habitat conservation areas. • Leavenworth: Not consistent. The City's CAO appears to provide only minimal protection of critical freshwater habitats. The stream buffer is 25 feet for all stream types measured on the slope rather than horizontally. Preparation of a wildlife habitat conservation plan may be required of some projects that contain fish and wildlife habitat conservation areas. • Wenatchee: Not consistent. The CAO takes a non-prescriptive approach, requiring a site analysis prepared by a qualified professional. These elements may need to be added. It is trusted that the qualified professional preparing the site analysis will include these elements appropriately. While the provisions included in the CAO may result in consistency with the

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
Authorization of appropriate restoration projects is facilitated. WAC 173-26-221(2)(c)(iv)(C)(III)	Not stated outright in the current SMPs.	<p>Partially Consistent in the SMPs. Closest statement: Goals for the Master Program Elements I. – <i>Encourage the restoration of shoreline areas which have been modified, blighted, or otherwise disrupted by natural or human activities.</i> (Note: the Chelan SMP does not contain the Goals and Policies section).</p> <p>The County's CAO includes several exemptions for restoration projects by public or private agencies, and by any party that has WDFW approval.</p> <p>The Cities' CAOs and SMPs do not contain specific discussion of restoration projects, other than generally as mitigation. Cashmere, Chelan, Entiat, Leavenworth, and Wenatchee do not include a CAO exemption for restoration.</p>	The SMP permit matrix and regulations can expand further on the CAO exemption to make certain that the WAC exemption for restoration projects is not unintentionally blocked by requirements for CUP (or outright prohibitions in some environments) for certain uses and modifications that may actually be restoration related (e.g. some fills).	WAC in practice, it is difficult to evaluate without more specific standards. The SMP permit matrices and regulations can make certain that the WAC exemption for restoration projects is not unintentionally blocked by requirements for CUP (or outright prohibitions in some environments) for certain uses and modifications that may actually be restoration related (e.g. some fills).
Regulations protect hydrologic connections between water bodies, water courses, and associated wetlands. WAC 173-26-221(2)(c)(iv)(C)(IV)	Not included in the current SMP.	Not Consistent. Neither the SMPs nor the CAOs address this issue.	Specific regulations regarding hydrologic connections may need to be added to the Critical Areas section of the SMP (rather than amending the CAOs directly).	
Flood Hazard Reduction. WAC 173-26-221(3)				
New development within the channel migration zone or floodway limited to uses and activities listed in WAC 173-26-221(3)(b) and (3)(c)(i)	Not included in the current SMP.	Not Consistent. Although not included in the SMP, Sections 2.3 – 2.8 above describe where and under what circumstances new development can occur in floodways and flood hazard areas according to other County and City regulations. The regulations are generally consistent with the Guidelines, except that certain developments or modifications can be allowed in floodways when certified by an engineer. None of the regulations refer specifically to channel migration zones.	Specific regulations regarding channel migration zone may need to be added to a new Flood Hazard Reduction section of the SMP (rather than amending the local regulations directly).	
New structural flood hazard reduction measures allowed only: where demonstrated to be necessary, and when nonstructural methods are infeasible and mitigation is accomplished. landward of associated wetlands and buffer areas except where no alternative exists as documented in a geotechnical analysis. WAC 173-26-221(3)(c)(ii) & (iii)	A specific Flood Hazard Reduction section is not included in the SMP, but structural flood hazard reduction measures would be reviewed under Section 20 - Shoreline Works and Structures (SWS) of the SMP, which by definition applies to levees and dikes.	Partially Consistent. Policy 10a. says that shoreline works and structures <i>should be located and constructed in such a manner which will result in no significant adverse effects on adjacent shorelines, will minimize alterations of the natural shoreline, and have no long term adverse effects on fish habitat...should be designed and located to avoid significant damage to ecological values or to natural resources...</i> and <i>“where flood protection measures such as dikes are planned, they should be placed landward of the streamway, including directly associated swamps or marshes and other wetlands...</i> These policies (which are not adopted as part of Chelan's SMP) are not specifically reflected in any of the SWS regulations. Further, there is no requirement for analysis of alternative measures in a geotechnical analysis.	Update the SMP as identified in the Consistency Analysis, bringing forward regulations that are consistent with the current SMPs policies.	
New publicly funded dikes or levees required to dedicate and improve public access (see exceptions). WAC 173-26-221(3)(c)(iv)	Not included in the current SMP.	Not Consistent.	Per the Guidelines, require improvement and dedication of public access pathways for all new dike and levee construction where consistent with safety objectives.	
Removal of gravel for flood control allowed only if biological and geomorphological study demonstrates a long-term benefit to flood hazard reduction, no net loss	Not included in the current SMP.	Not Consistent. The SMPs specify that one purpose of dredging is to <i>remove obstacles to water flow</i> , which indirectly would assist flood control efforts. While a policy statement that	Update the SMP as identified in the Consistency Analysis.	

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
of ecological functions, and extraction is part of a comprehensive flood management solution. WAC 173-26-221(3)(c)(v)		<i>Dredging should be controlled to minimize damage to existing ecological values and natural resources, no reference to special studies or other specific requirements included in the Guidelines are made.</i>		
Public Access. WAC 173-26-221(4)				
Policies and regulations protect and enhance both physical and visual access. WAC 173-26-221(4)(d)(i)	County: Policies – pp 18-19, Section 17. Regulations – p. 62, Section 28. Cities of Cashmere, Entiat, Leavenworth, and Wenatchee: Policies – pp. 18-19, Section 17 All Cities: Regulations – pp. 36-37, Section 28	Chelan County, and Cities of Cashmere, Entiat, Leavenworth, and Wenatchee: Partially Consistent: Policies address physical access together with recreation but would benefit from coordination with adopted parks and recreation plans and a separate section on public access apart from recreation. Visual concerns are addressed in other in policies on scenic views and vistas. Co-location of access is promoted in policies. Not Consistent: Recreation regulations focus on parking and support facilities. The SMP lacks much in the way of standards for parks, trails or other public access facilities. City of Chelan: Not Consistent – Policies. No policies provided in SMP. Not Consistent: Recreation regulations, per analysis above.	Consistency: Update as identified with consistency analysis. Other Recommendations: Treat public access in own section apart from general recreation.	Cities of Cashmere, Entiat, Leavenworth, and Wenatchee: Same as County. City of Chelan: Public access policies should be added, and can be selected from the City's Comprehensive Plan, Parks and Recreation Comprehensive Plan, Lakeside Trail Feasibility Study, and Lake Chelan Valley Trail Plan, as appropriate. Regulations – Same as County.
Public entities are required to incorporate public access measures as part of each development project, unless access is incompatible with safety, security, or environmental protection. WAC 173-26-221(4)(d)(ii)	Same location as above.	Partially Consistent: Section 26 (d) requires visual access to scenic vistas associated with new public roads. Public access not required for other public facilities.	Consistency: Update as identified with consistency analysis. Other Recommendations: Treat public access in own section apart from general recreation.	Same as County.
Non-water-dependent uses (including water-enjoyment, water-related uses) and subdivisions of land into more than four parcels include standards for dedication and improvement of public access. WAC 173-26-221(4)(d)(iii)		Not Consistent: Public access not required as a condition of non-water dependent uses. Closest statement: <i>Joint use docket required for subdivision, multi-family residences, or commercial and industrial enterprises in close proximity to one another.</i>	Consistency: Update as identified with consistency analysis. Other Recommendations: Treat public access in own section apart from general recreation.	Same as County.
Maximum height limits, setbacks, and view corridors minimize impacts to existing views from public property or substantial numbers of residences. WAC 173-26-221(4)(d)(iv); RCW 90.58.320		Consistent - Heights: Maximum residential heights vary from 15 to 35 feet depending on use environment: Sections 16.1 to 16.4. Commercial heights vary from 25 to 35 feet depending on use environment in sections 17.1 to 17.3. Ports and industries allowed to 35 feet, sections 20.1 to 20.3. Not Consistent - Setbacks: Setbacks not universally applied to all uses, and are not coordinated with zoning standards or critical area buffers. (e.g. Residential setbacks not stated in Urban environments but required in Conservancy and Natural environments. Residential setback is greater for Conservancy than Natural environment. There are no commercial setbacks. Industrial setbacks are 20 feet. Recreational setbacks are the same as residential). Setbacks in commercial and industrial cases would not account for public access opportunities.	Other Recommendations: SMP heights are equal to or less than RCW 90.58.320. SMP heights are similar to many zoning districts, but less than maximum heights in some zones. Determine if there are overriding considerations of the public interest if heights are desired above 35 feet for SMP update (RCW 90.58. 320)	Same as County.
Vegetation Conservation (Clearing and Grading). WAC 173-26-221(5)				
Vegetation standards implement the principles in WAC 173-26-221(5)(b). Methods to do this may include setback or buffer requirements, clearing and grading standards, regulatory incentives, environment designation standards, or other master program provisions. WAC 173-26-221(5)(c)	Not stated outright in the current SMP.	Partially Consistent: There is no discrete vegetation conservation section in the SMP, although there are scattered policies and regulations generally and for specific uses or modifications requiring restoration of disturbed areas and landscaping. Closest statements: Overall Shoreline Goal 2 – <i>Protect against</i>	While the current SMP has setback provisions (generally based on a common line setback for residential and commercial uses, 20 feet for industrial, and other variations) and general landscaping standards for different uses	No consistent. The current SMPs have setback provisions (generally based on the rear yard setback established in zoning for residential uses, 25 feet for commercial, and other variations) and general landscaping standards for

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		<p><i>adverse effects to the public health, the land, its vegetation and wildlife, and the waters and their aquatic life within Chelan County.</i></p> <p>Goals for the Master Program Elements G. – <i>Assure preservation of unique, fragile and scenic elements; assure conservation of non-renewable resources; assure continued utilization of the renewable resources such as timber, water, and wildlife.</i> (City of Chelan SMP does not include these goals and policies)</p> <p>Regulation 9.8 in County SMP/10.5 in City SMPs – <i>Upon completion of construction, installation or maintenance of projects on shorelines, the disturbed area shall be restored to as near pre-project configuration as possible, replanted with appropriate vegetative cover and provided maintenance care until newly planted vegetation is established.</i></p>	<p>and activities, the recently updated County CAO establishes protective buffers for shorelines based on best available science that vary by environment designation. The fish and wildlife habitat conservation areas chapter of the CAO also has specific incentives related to taxation and encourages coordination with Chelan County DNR to implement voluntary restoration projects. SMP development will support those buffers and protection standards.</p>	<p>different uses and activities. The updated SMPs will need to develop appropriate setbacks by environment designation or use, and other clearing and vegetation alteration/protection standards.</p>
<p>Selective pruning of trees for safety and view protection is allowed and removal of noxious weeds is authorized. WAC 173-26-221(5)(c)</p>	<p>Not included in the current SMP.</p>	<p>Not Consistent.</p>	<p>Specific standards will need to be established for vegetation alterations related to hazards, view maintenance, and noxious weeds.</p>	
<p>Water Quality. WAC 173-26-221(6)</p>				
<p>Provisions protect against adverse impacts to water quality and storm water quantity and ensure mutual consistency between SMP and other regulations addressing water quality. WAC 173-26-221(6)</p>	<p>Not stated outright in the current SMP.</p>	<p>Not Consistent: Closest statements: Overall Shoreline Goal 2 – <i>Protect against adverse effects to the public health, the land, its vegetation and wildlife, and the waters and their aquatic life within Chelan County.</i></p>	<p>The County and Cities are all actively engaged in stormwater planning and most utilize Ecology’s latest stormwater manual (see discussion of stormwater management by the County and Cities in Section 3.3.2 above). Further, several jurisdictions are involved in development and implementation of TMDLs for various water quality parameters. However, the SMP would benefit from a new section that provides specific direction to all uses and activities related to water quality protection, and references relevant existing municipal code regulations as appropriate.</p>	
<p>SHORELINE MODIFICATIONS</p>				
<p>SMP: (a) allows structural shoreline modifications only where demonstrated to be necessary to support or protect an allowed primary structure or a legally existing shoreline use that is in danger of loss or substantial damage or are necessary for mitigation or enhancement; (b) limits shoreline modifications in number and extent; (c) allows only shoreline modifications that are appropriate to the specific type of shoreline and environmental conditions for which they are proposed; (d) gives preference to those types of shoreline modifications that have a lesser impact on ecological functions. Policies promote "soft" over "hard" shoreline modification measures (f) incorporates all feasible measures to protect ecological shoreline functions and ecosystem-wide processes as modifications occur; (g) requires mitigation sequencing. WAC 173-26-231(2); WAC 173-26-231(3)(a)(ii) and (iii);</p>	<p>The County and City SMPs title the section Shoreline Works and Structures (SWS) and defines it in Section 7.2.650. Marinas are in a stand-alone section.</p>	<p>Partially Consistent: (a) Closest statement: Policy 10.c – <i>Construction of bulkheads should be permitted where they provide protection to marinas, upland areas, facilities, or natural features.</i> (b) Policy 10.a – <i>SWS should be located and constructed in such a manner which will result in no significant adverse effects on adjacent shorelines, will minimize alterations of the natural shoreline, and have no long term adverse effects.</i> There is an implied limitation on number and extent within this policy. (c) Section 21 of the regulations differentiates between environment designations in allowances for SWS. (d) Other than general policies about minimizing alterations and impacts, the SMP does not indicate preferences for different types of shoreline modifications, and does not distinguish “hard” from “soft” measures. (f) The SMP only contains general policies about minimizing alterations and impacts, with no specific use of the words functions or processes. (g) The SMP does not include the mitigation sequencing concept.</p>	<p>Update the SMP as identified in the Consistency Analysis. A number of the required principles are imbedded in the current SMP, but they could be spelled out more directly and contain specific regulations that support the general policies more fully. The County’s CAO does allow bulkheads to be constructed, but only when no other alternative exists, it’s necessary to protect an existing single-family residence, and subject to a mitigation plan. As previously discussed, the CAO also includes standard mitigation sequencing provisions.</p>	<p>The City’s versions of the SWS regulations are older than the County’s, which were updated in 1994. However, the general policies are the same and the general regulations for each environment are virtually identical. Update the SMP as identified in the Consistency Analysis.</p>

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
Shoreline Stabilization. WAC 173-26-231(3)(a)				
Definition: structural and nonstructural methods to address erosion impacts to property and dwellings, businesses, or structures caused by natural processes, such as current, flood, tides, wind, or wave action. WAC 173-26-231(3)(a)(i) Definition of new stabilization measures include enlargement of existing structures. WAC 173-26-231(3)(a)(iii)(C), last bullet; WAC 173-26-231(3)(a)(iii)(B)(I), 5 th bullet	Not included in the current SMP.	Not Consistent. There is no discrete shoreline stabilization definition.	Update the SMP as identified in the Consistency Analysis.	
Standards setting forth circumstances under which shoreline alteration is permitted , and for the design and type of protective measures and devices. WAC 173-26-231(3)(a)(ii)	SWS policies 10a-c, e SWS regulations 21.1	Partially Consistent. In general, policies and standards regarding shoreline stabilization are minimal.	Update the SMP as identified in the Consistency Analysis.	
New development (<i>including newly created parcels</i>) required to be designed and located to prevent the need for future shoreline stabilization, based upon geotechnical analysis. New development on steep slopes and bluffs required to be set back to prevent need for future shoreline stabilization during life of the project, based upon geotechnical analysis. New development that would require shoreline stabilization which causes significant impacts to adjacent or down-current properties and shoreline areas is prohibited. WAC 173-26-231(3)(a)(iii)(A)	Not stated outright in the current SMP.	Not Consistent: Closest statements: Policy 10.a – <i>SWS should be located and constructed in such a manner which will result in no significant adverse effects on adjacent shorelines, will minimize alterations of the natural shoreline, and have no long term adverse effects on fish habitat.</i> Policy 10.e – <i>SWS should be designed and located to avoid significant damage to ecological values or to natural resources which would create a hazard to adjacent life, property and natural resource systems.</i> Section 21.1.2 – <i>The builder of any SWS shall be responsible for adverse effects on the property of other caused by his construction and shall take all necessary precautions to minimize such effects.</i>	Update the SMP as identified in the Consistency Analysis.	
New structural stabilization measures are not allowed except when necessity is demonstrated. Specific requirements for <i>how to demonstrate need</i> are established for: (I) existing primary structures; (II) new non-water-dependent development including Single Family Residences; (III) water-dependent development; and (IV) ecological restoration/toxic clean-up remediation projects. WAC 173-26-231(3)(a)(iii)(B)	Not included in the current SMP.	Not Consistent.	Update the SMP as identified in the Consistency Analysis.	
Replacement of existing stabilization structures is based on demonstrated need. Waterward encroachment of replacement structure only allowed for residences occupied prior to January 1, 1992, or for soft shoreline stabilization measures that provide restoration of ecological functions. WAC 173-26-231(3)(a)(iii)(C)	Not stated outright in the current SMP.	Not Consistent.	Update the SMP as identified in the Consistency Analysis.	
Geotechnical reports prepared to demonstrate need include estimates of rate of erosion and urgency (damage within 3 years) and evaluate alternative solutions. WAC 173-26-231(3)(a)(iii)(D)	Not included in the current SMP.	Not Consistent.	Update the SMP as identified in the Consistency Analysis.	
Shoreline stabilization structures are limited to the minimum size necessary. WAC 173-26-	Not included in the current SMP.	Partially Consistent. Policy 10.a – <i>SWS should be located and constructed in such a manner which will result in no</i>	Update the SMP as identified in the Consistency Analysis.	

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
231(3)(a)(iii)(E)		<i>significant adverse effects on adjacent shorelines, will minimize alterations of the natural shoreline, and have no long term adverse effects. There is an implied limitation size within this policy.</i>		
Public access required as part of publicly financed shoreline erosion control measures. WAC 173-26-231(3)(a)(iii)(E)	Not stated outright in the current SMP.	Not Consistent: Closest statement: Goals for the Master Program Elements B. – <i>Assure safe, convenient and diversified access to public shorelines; assure that the intrusion created by public access will not endanger life or have adverse effects on property or fragile natural features; assure that the provision for public access will minimize conflicts between the public and private property.</i>	Update the SMP as identified in the Consistency Analysis.	
Impacts to sediment transport required to be avoided or minimized. WAC 173-26-231(3)(a)(iii)(E)	Not included in the current SMP.	Not Consistent.	Update the SMP as identified in the Consistency Analysis.	
Piers and Docks WAC 173-26-231(3)(b)				
New piers and docks: allowed only for water-dependent uses or public access restricted to the minimum size necessary to serve a proposed water-dependent use. permitted only when specific need is demonstrated (except for docks accessory to single-family residences). Note: Docks associated with single family residences are defined as water dependent uses provided they are designed and intended as a facility for access to watercraft. WAC 173-26-231(3)(b)	County SMP Section 21.A.	Partially Consistent in County SMP: Consistent: The County SMP includes a 1994 amendment addressing piers and docks (Section 21.a). <i>[Commercial and industrial] Piers and docks shall be permitted for water dependent and water related uses or for multiple use facilities if the majority use is water dependent or related and access can safely be provided. Maximum size of the pier or dock shall be no greater than necessary to serve the intended use...</i> Dimensional standards for residential and community piers are size-restrictive. The only regulation specifically missing from the SMP is requirement for demonstration of need. Not Consistent in City SMPs: Only the requirement in the City SMPs that SWS only be permitted in the Conservancy environment if water-dependent or related is consistent with the Guidelines. A similar stipulation is not made for the other environments. Policy 10.a (noted above) also implies some limitation on size.	Update the SMP as identified in the Consistency Analysis.	
When permitted, new residential development of more than two dwellings required to provide joint use or community docks, rather than individual docks. WAC 173-26-231(3)(b)	Not stated outright in the current SMP.	Partially Consistent: Closest statements: Policy 10.g – <i>Encouragement should be given to the cooperative use of docks rather than a proliferation of single purpose private docks in order to minimize disruption of shorelines and reduction of usable water surface.</i> Section 21.A.6.1.b (County SMP) – <i>For all subdivisions, short subdivisions and all other divisions of land... community docks or piers shall be encouraged and may be allowed where they are found to be consistent with the provisions of this program...</i> Section 21.A.8.a (County SMP) – <i>For all subdivisions, short subdivisions and all other divisions of land... private, single use docks or piers may be allowed only upon approval of a shoreline CUP...</i>	The policies of the current SMP need to be translated into regulations, and the existing regulations in the County SMP expanded to include developments of more than two dwellings, not just subdivisions.	
Design and construction of all piers and docks required to avoid, minimize and mitigate for impacts to ecological processes and functions and be constructed of approved materials. WAC 173-26-231(3)(b)	Not included in the current SMP.	Partially Consistent in County SMP: The SMP contains general policies regarding design of SWS to avoid and minimize impacts. The 1994 amendment provides detailed dimensional standards for piers that implement the avoid and minimize policies, and also includes some materials specifications. However, mitigation is not addressed	Update the SMP as identified in the Consistency Analysis. In addition, state and federal agencies have developed more detailed standards for piers and docks which should be incorporated into updated SMP standards for consistency where appropriate.	

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
		Not Consistent in City SMPs: Although the SMPs contain general policies regarding design of SWS to avoid and minimize impacts, the City SMPs do not contain any specific dimensional standards for piers, or specific criteria for materials and mitigation.		
Fill. WAC 173-26-231(3)(c)				
Definition of "fill" consistent with WAC 173-26-020(14)	No definition provided in current SMP.	Not Consistent. The SMPs do not include a definition for fill, but do include a definition for "landfill" which is similar.	Update the SMP with the following definition of fill from WAC 173-26-020(14). "Fill" means the addition of soil, sand, rock, gravel, sediment, earth retaining structure, or other material to an area waterward of the OHWM, in wetlands, or on shorelands in a manner that raises the elevation or creates dry land.	
Location, design, and construction of all fills protect ecological processes and functions, including channel migration. WAC 173-26-231(3)(c)	Not stated outright in the current SMP. Some relevant regulations in Section 22 – Landfills.	Partially Consistent: Closest statements: Policy 11.c – <i>In evaluating landfill proposals, such factors as water surface reduction, navigation restriction, impact on water flow, improvement and/or maintenance of water quality, impact on fish or wildlife habitat, and effect on adjoining property should be considered.</i> Policy 11.d – <i>The perimeter of all landfills should be provided with vegetation, retaining walls or other means of preventing erosion.</i> Policy 11.e – <i>Shoreline fills or cuts should be designed and located to avoid significant damage to existing ecologic values or natural features.</i> The regulations for landfill generally address minimization of quantity of fill, but don't address functions and process directly.	Update the SMP as identified in the Consistency Analysis.	
Fill waterward of the OHWM allowed only by shoreline conditional use permit, for: water-dependent use; public access; cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan; disposal of dredged material in accordance with DNR Dredged Material Management Program; expansion or alteration of transportation facilities of statewide significance currently located on the shoreline (if alternatives to fill are shown not feasible); mitigation action, environmental restoration, beach nourishment or enhancement project. WAC 173-26-231(3)(c)		Not Consistent: Policy 11a states that <i>Landfilling for the express purpose of creating new land for non-shoreline related uses should be prohibited.</i> Fill waterward of the OHWM is permitted outright in the Urban and Rural environments. It is permitted outright in certain circumstances in the Conservancy environment and prohibited in the Natural environment. No CUPs are required for any waterward fills. The allowed purposes for the waterward fills are generally limited to facilitation of water-dependent uses and recreation, installation of "normal protective bulkhead common to a single family residence," and creation of a minimum buildable area on an existing single-family lot. Specific or general recognition for fills for dredged material disposal, contaminated site cleanup, restoration, or transportation facilities is not included.	Update the SMP as identified in the Consistency Analysis.	
Breakwaters, Jetties, Groins, and Weirs. WAC 173-26-231(3)(d)				
Structures waterward of the ordinary high-water mark allowed only for water-dependent uses, public access, shoreline stabilization, or other specific public purpose. WAC 173-26-231(3)(d)	Not stated outright in the current SMP.	Not Consistent: Breakwaters, jetties, and weirs are not specifically included in the definition of Shoreline Works and Structures, although they could be considered in the category of "protective structures" or "similar structures."	Update the SMP as indicated by the Consistency Analysis. Developing a separate section of the SMP for breakwaters, jetties, and weirs is an option, or these structures could be more specifically incorporated into definitions and regulations for SWS.	
Shoreline conditional use permit required for all structures except protection/restoration projects. WAC 173-26-231(3)(d)	Section 21 – Shoreline Works and Structures (SWS)	Not Consistent: SWS are permitted outright in the Urban, Rural, Conservancy and Natural environments.	Update the SMP as indicated by the Consistency Analysis.	
Protection of critical areas and appropriate mitigation required. WAC 173-26-231(3)(d)	Not included in the current SMP.	Not Consistent.	Update the SMP as indicated by the Consistency Analysis.	

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
Dunes Management. WAC 173-26-231(3)(e)	Not applicable in Chelan County	NA		
Dredging and Dredge Material Disposal. WAC 173-26-231(3)(f)				
Dredging and dredge material disposal avoids or minimizes significant ecological impacts. Impacts which cannot be avoided are mitigated. WAC 173-26-231(3)(f)	Not stated outright in the current SMP.	Partially Consistent: Closest statements: Policy 12.a – <i>Dredging should be controlled to minimize damage to existing ecological values and natural resources.</i> Policy 12.b – <i>Deposit of spoils in wetlands or in the water should be permitted only to improve habitat or when the alternative is more detrimental than depositing in wetlands.</i> The policy statements in the SMP are an effort to consider ecological functions in implementation of dredging projects. However, the regulations do not specifically implement these policies, or require mitigation. The SMP does also consider protection of ecological values by prohibiting dredging in Natural Environments, and allowing it in Rural and Conservancy environments only for water-dependent uses.	Update the SMP as indicated by the Consistency Analysis.	
New development siting and design avoids the need for new and maintenance dredging. WAC 173-26-231(3)(f)	Not included in the current SMP.	Not Consistent.	Update the SMP as identified in the Consistency Analysis.	
Dredging to establish, expand, relocate or reconfigure navigation channels allowed only where needed to accommodate existing navigational uses and then only when significant ecological impacts are minimized and when mitigation is provided. WAC 173-26-231(3)(f)	Not included in the current SMP.	Partially Consistent. Although not specifically stated in the WAC terms, the definition of dredging includes “deepening a navigation channel,” presumably an existing navigation channel with existing navigational use.	Update the SMP as identified in the Consistency Analysis.	
Maintenance dredging of established navigation channels and basins restricted to maintaining previously dredged and/or existing authorized location, depth, and width. WAC 173-26-231(3)(f)	Not included in the current SMP.	Not Consistent. Similar to above. No specific mention is included of maintenance dredging for either navigation channels or basins.	Update the SMP as identified in the Consistency Analysis.	
Dredging for fill materials prohibited except for projects associated with MTCA or CERCLA habitat restoration, or any other significant restoration effort approved by a shoreline CUP. Placement of fill must be <i>waterward</i> of OHWM. WAC 173-26-231(3)(f)	Section 23 Section 23.1.6	Partially Consistent: <i>Dredging solely to obtain fill materials is prohibited in all environments.</i> <i>Placing of dredge spoils waterward of the ordinary high water mark shall be prohibited except for improvement of fish habitat.</i>	Update the SMP as indicated by the Consistency Analysis. The allowance for dredging for fill should be expanded to include other restoration projects.	
Uses of dredge material that benefits shoreline resources are addressed. If applicable, addressed through implementation of regional interagency dredge material management plans or watershed plan. WAC 173-26-231(3)(f)	Not stated outright in the current SMP.	Partially Consistent: Closest statement: Section 23.1.6 - <i>Placing of dredge spoils waterward of the ordinary high water mark shall be prohibited except for improvement of fish habitat.</i>	Update the SMP as indicated by the Consistency Analysis.	
Disposal within river channel migration zones discouraged, and in limited instances when allowed, require CUP. (Note: not intended to address discharge of dredge material into the flowing current of the river or in deep water within the channel where it does not substantially effect the geo-hydrologic character of the channel migration zone). WAC 173-26-231(3)(f)	Not included in the current SMP.	Not Consistent. The SMP does not reference CMZs.	Update the SMP as indicated by the Consistency Analysis.	
Shoreline Habitat and Natural Systems Enhancement Projects. WAC 173-26-231(3)(g)				
Provisions that foster habitat and natural system enhancement projects , provided the primary purpose is restoration of the natural character and functions of the shoreline, and only when consistent with	Not stated outright in the current SMP.	Partially Consistent: Closest statement: Goals for the Master Program Elements I. – <i>Encourage the restoration of shoreline areas which have been modified, blighted, or otherwise disrupted by natural or human activities.</i> This element is not	Update the SMP as indicated by the Consistency Analysis.	

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
implementation of the restoration plan developed pursuant to WAC 173-26-201(2)(f)		applicable to the current SMP as it references a Restoration Plan to be prepared as part of this update.		
SPECIFIC SHORELINE USES				
Agriculture. WAC 173-26-241(3)(a)				
Use of agriculture related terms is consistent with the specific meanings provided in WAC 173-26-020. WAC 173-26-241(3)(a)(ii) and (iv)	County: Page 23, Section 7.2.50 All Cities: Page 3, Section 7.2.5	Not Consistent. Definition in SMP does not match WAC 173.26.020. Also definitional language is found in policies (SMP Section 1; except in City of Chelan which does not include goals or policies).	Consistency: Update definitions and remove definitional language in policies or standards.	Same as County.
Provisions address new agricultural activities , conversion of agricultural lands to other uses, and other development not meeting the definition of agricultural activities. Provisions assure that development in support of agricultural uses is: (A) consistent with the environment designation; and (B) located and designed to assure no net loss of ecological functions and not have a significant adverse impact on other shoreline resources and values. WAC 173-26-241(3)(a)(ii) & (v)	County: Page 40, Section 12 All Cities: Pages 16 to 17, Section 12	Not Consistent: Clarify applicability to existing versus new activities. Policies should be modified to cross reference appropriate law related to water resources, ensure consistency with WRIA plans. Regulations do not address no-net-loss of ecological functions of new agricultural activities. In County SMP only, the closest statement: for livestock grazing <i>“preserve a sufficient amount of streamside vegetation to maintain bank stability, water quality, and shade and cover for fish and game.”</i>	Consistency: Update as identified with consistency analysis.	Same as County.
Shoreline substantial development permit is required for all agricultural development not specifically exempted by the provisions of RCW 90.58.030(3)(e)(iv)	County: Pages 38 to 40, Section 11. All Cities: Page 10, Section 7.2.70	Partially Consistent: Need to update exemption language, and standards for non-exempt uses.	Consistency: Update as identified with consistency analysis.	Same as County.
Conversion of agricultural land to non-agricultural uses is consistent with the environment designation, and regulations applicable to the proposed use do not result in a net loss of ecological functions. WAC 173-26-241(3)(a)(vi)	County: Page 40, Section 12 All Cities: Pages 16 to 17, Section 12	Not Consistent: Clarify applicability to existing versus new activities. Does not address no-net-loss of ecological functions of new agricultural activities. In County SMP only, closest statement: <i>for livestock grazing “preserve a sufficient amount of streamside vegetation to maintain bank stability, water quality, and shade and cover for fish and game.”</i>	Consistency: Update as identified with consistency analysis.	Same as County.
Aquaculture. WAC 173-26-241(3)(b)				
Location and design requirements for aquaculture facilities avoid: loss of ecological functions, impacts to eelgrass and macroalgae, significant conflict with navigation and water-dependent uses, the spreading of disease, introduction of non-native species, or impacts to shoreline aesthetic qualities. Impacts to functions are mitigated. WAC 173-26-241(3)(b)	County: Page 42, Section 13 All Cities: Pages 17-18, Section 13	Not Consistent: Use environments identify if aquaculture is permitted, but the only standard is under Conservancy environment to minimize environmental and navigational impacts. More location criteria are needed along with provisions to avoid conflicts with navigation, water dependent uses, shoreline ecology and shoreline views.	Consistency: Update as identified with consistency analysis.	Same as County.
Boating Facilities. WAC 173-26-241(3)(c)				
Definition: Boating facility standards do not apply to docks serving four or fewer SFRs. WAC 173-26-241(3)(c)	The current SMP does not include a definition for boating facilities. The current SMPs split boating facilities between the SWS section (21 and 21.A in County SMP and 21 in City SMPs) and Section 19 (Marinas and Boathouses in County SMP and Marinas in	Not Consistent: A definition for marinas is provided in Section 7.2.470 – <i>A dock or basin providing moorage for watercraft and offering supply, repair, or other support facilities. A marina may be either open to the public or for the exclusive use of a group.</i>	Add the WAC definition for marinas, and differentiate in policies and regulations between “boating facilities” (which would include marinas) and piers and docks serving four or fewer single-family residences.	

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
	City SMPs)			
Boating facilities restricted to suitable locations . WAC 173-26-241(3)(c)(i)	Not stated outright in the current SMP.	Partially Consistent: Closest statements: Policy 8.c – <i>Marinas should be located near high use and potential high use areas</i> . Regulation 19.1.1 – <i>Marinas which can be sited, designed and built in such a way as to minimize conflicts with other... uses</i> may be permitted in all environments except Natural.	Clarification of what might be “suitable locations” for marinas (and other boating facilities) should be added. Restriction on the range of environments that might allow boating facilities, including marinas, should be considered.	
Provisions ensuring health, safety, and welfare requirements are met. WAC 173-26-241(3)(c)(ii)	Not included in the current SMP.	Partially Consistent. The marinas policy introduction section references local and State health agencies requirements to protect public health. SWS policy 9 also states that SWS should be located and designed avoid creating hazards to life and property.	More explicit policies and regulations should be included regarding health, safety and welfare.	
Provisions to avoid or mitigate aesthetic impacts . See WAC 173-26-241(3)(c)(iii)	Not stated outright in the current SMP.	Partially Consistent: Closest statements: Policy 8.a – <i>Marinas should be aesthetically compatible with surrounding development</i> . Policy 10.b. <i>SWS should be designed to blend with the surroundings and not detract from the aesthetic qualities of the shorelines</i> . In the County and City SMPs, regulation 21.1.4 also requires blending with the surrounding development. No references to mitigation are included.	The policy and regulation statements should express more directly that aesthetic impacts are to be avoided and mitigated when necessary.	
Public access required in new boating facilities. WAC 173-26-241(3)(c)(iv)	Not included in the current SMP.	Partially Consistent. The marina policies and regulations do not reference public access, nor do the Cities’ SWS policies and regulations. However, the County SWS regulations include a requirement for public access for community piers and docks affiliated with hotels, motels and multi-family developments.	Update the SMP as indicated by the Consistency Analysis.	
Impacts of live-aboard vessels are limited. WAC 173-26-241(3)(c)(v)	Not included in the current SMP.	Not Consistent. The SMPs do not mention live-aboard vessels, either to permit or prohibit them. The definition of boathouse specifically states that boathouses are not for human habitation.	The County and Cities may wish to expressly prohibit live-aboards.	
Provisions assuring no net loss of ecological functions as a result of development of boating facilities while providing public recreational opportunities. WAC 173-26-241(3)(c)(vi)	Not included in the current SMP.	Not Consistent:	Update the SMP as indicated by the Guidelines.	
Navigation rights are protected. WAC 173-26-241(3)(c)(vii)	Not included in the current SMP.	Not Consistent. The SMPs do not mention design and location of facilities to consider navigation, other than very indirectly stating a need to site and design facilities to avoid conflicts with other uses.	Update the SMP as indicated by the Consistency Analysis.	
Extended moorage on waters of the state without a lease or permission is restricted, and mitigation of impacts to navigation and access is required. WAC 173-26-241(3)(c)(viii)	Not included in the current SMP.	Not Consistent. No references to extended moorage are included in the SMPs.	Update the SMP as indicated by the Guidelines.	
Commercial Development. WAC 173-26-241(3)(d)				
Preference given first to water-dependent uses, then to water-oriented commercial uses. WAC 173-26-241(3)(d)	County: Pages 48 and 49, Section 17 All Cities: Pages 23-24, Section 17	Partially Consistent: For Rural, and Conservancy environments, only water dependent and water related commercial uses are allowed. In Urban environment, no use preference is stated. In Urban Environment, preferential setbacks given to water dependent uses.	Consistency: Address use preferences in all use environments. An allowance for water enjoyment uses may be appropriate in local areas of more intensive rural development (e.g. Rural Waterfront and Rural Village).	Consistency: Address use preferences in all use environments. Particularly in waterfront commercial and tourist oriented zones, address water enjoyment uses.
Water-enjoyment and water-related commercial uses required to provide public access and ecological restoration where feasible and avoid impacts to existing	County: Pages 48 and 49, Section 17	Not Consistent: Public access and restoration are not required where feasible.	Consistency: Address public access and restoration where feasible. Public access should reinforce adopted parks	Same as County.

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
navigation, recreation, and public access. WAC 173-26-241(3)(d)	All Cities: Pages 23-24, Section 17		and recreation plans and consider safety and ecologically fragile areas.	
New non-water-oriented commercial uses prohibited unless they are part of a mixed-use project, navigation is severely limited, and the use provides a significant public benefit with respect to SMA objectives. WAC 173-26-241(3)(d)	County: Pages 48 and 49, Section 17 All Cities: Pages 23-24, Section 17	Not Consistent: Non-water oriented uses are not distinguished in the commercial standards.	Consistency: Allow non-water oriented uses that are part of a mixed use development, or are separately from the shoreline by an intervening property or right-of-way, or are located where navigation is limited and provide a significant public benefit. Consider if non-water-oriented use can become water-oriented due to significant public access opportunity.	Same as County.
Non-water-dependent commercial uses over water prohibited except in existing structures, and where necessary to support water-dependent uses. WAC 173-26-241(3)(d)	County: Pages 48 and 49, Section 17 All Cities: Pages 23-24, Section 17	Not Consistent: Non-water oriented uses are not distinguished in the commercial standards.	Consistency: Allow in existing structures or if accessory to water-dependent uses.	Same as County.
Forest Practices. WAC 173-26-241(3)(e)				
Forest practices not covered by the Forest Practices Act, especially Class IV-General forest practices involving conversions to non-forest use result in no net loss of ecological functions and avoid impacts to navigation, recreation and public access. WAC 173-26-241(3)(e)	Not included in the current SMP.	Partially Consistent. The SMPs lack any provisions specifically related to conversion, but do contain several policies and regulations related to ecological functions. For example, logging on steep slopes is discouraged unless potential sedimentation impacts are addressed through restoration and erosion control; use of buffers is encouraged to <i>retard surface runoff, reduce siltation, [and] provide shade for fish</i> ; and harvest should be conducted to maintain water quality standards. Specific provisions regarding navigation, recreation and public access are not included.	Update the SMP as indicated by the Consistency Analysis.	
SMP limits removal of trees on shorelines of Statewide significance (RCW 90.58.150). Exceptions to this standard require shorelines conditional use permit. WAC 173-26-241(3)(e)	Section 24	Partially Consistent. Up to 30 percent of the merchantable trees may be removed in harvests within Shorelines of Statewide Significance. The SMP does not mention a CUP requirement for exceptions.	Update the SMP as indicated by the Consistency Analysis.	
Industry. WAC 173-26-241(3)(f)				
Preference given first to water-dependent uses, then to water-oriented industrial uses. WAC 173-26-241(3)(f)	County: Pages 52-53, Section 20 All Cities: Pages 26-27, Section 20	County - Consistent: Water dependent and water related are preferred in Urban and Rural use environments. Water dependent allowed in Conservancy Environment. Non-water related uses are allowed with greater setbacks than for water oriented industrial. County has setbacks for water dependent and water related industries. County does not have a height provision for industries (stricken in errata). All Cities – Consistent: Water dependent and water related are preferred in Urban Environment. Water dependent is preferred in Rural or Conservancy environments. Cities include a standard that industries greater than 35 feet in height are to be designed to minimize view obstruction.	Other Recommendations. When use environments are updated, consider if use preference needs to be tweaked. For example, require public access with non-water oriented industries? See below.	Same as County.
Location, design, and construction of industrial uses and redevelopment required to assure no net loss of ecological functions. WAC 173-26-241(3)(f)	County: Pages 52-53, Section 20	County - Partially Consistent. No-net-loss of ecological functions is not fully addressed. Landscaping required to “mitigate the destruction of habitat.”	Consistency: Address no-net-loss of ecological function.	Same as County.

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
	All Cities: Pages 26-27, Section 20	All Cities – Not Consistent. Not addressed.		
Industrial uses and redevelopment encouraged to locate where environmental cleanup and restoration can be accomplished. WAC 173-26-241(3)(f)	County: Pages 52-53, Section 20 All Cities: Pages 26-27, Section 20	Not Consistent: Not addressed.	Consistency: Address restoration in SMP.	Same as County.
Public access required unless such a requirement would interfere with operations or create hazards to life or property. WAC 173-26-241(3)(f)	County: Pages 52-53, Section 20 All Cities: Pages 26-27, Section 20	Partially Consistent: Permitted but not required.	Consistency: Require public access if feasible and if implementing adopted parks and recreation plans. Restrict if needed based on review environmental constraints and public safety and security.	Same as County.
New non-water-oriented industrial uses prohibited unless they are part of a mixed-use project, navigation is severely limited, and the use provides a significant public benefit with respect to SMA objectives. WAC 173-26-241(3)(f)	County: Pages 52-53, Section 20 All Cities: Pages 26-27, Section 20	Consistent: Non-water oriented uses are not addressed as permitted uses.	Other Recommendations: Recommend allowing for non-water oriented uses if following WAC guidelines. Gives more flexibility to meet economic development goals.	Same as County.
In-Stream Structures. WAC 173-26-241(3)(g)				
Definition: structure is waterward of the ordinary high water mark and either causes or has the potential to cause water impoundment or the diversion, obstruction, or modification of water flow. WAC 173-26-241(3)(g)	In-stream structures are not specifically defined in the current SMP.	Not Consistent: The definition of Shoreline Works and Structures includes bulkheads, seawalls, protective structures, piers, levees, dikes, channelization, docks, rip-rapping, and similar structures. This definition only loosely includes in-stream structures as intended by the WAC.	Use the WAC definition of in-stream structures, and consider establishing a discrete SMP chapter regulating in-stream structures. Alternatively, expand and subdivide the SWS chapter to specifically address in-stream structures.	
In-stream structures protect and preserve ecosystem-wide processes, ecological functions, and cultural resources, including, fish and fish passage, wildlife and water resources, shoreline critical areas, hydrogeological processes, and natural scenic vistas. WAC 173-26-241(3)(g)	Not included in the current SMP.	Not Consistent: Not addressed.	Update the SMP as indicated by the Consistency Analysis.	
Mining. WAC 173-26-241(3)(h)				
Policies and regulations for new mining projects: require design and operation to avoid and mitigate for adverse impacts during the course of mining and reclamation achieve no net loss of ecological functions based on required final reclamation give preference to proposals that create, restore or enhance habitat for priority species are coordinated with State Surface Mining Reclamation Act requirements. assure subsequent use of reclaimed sites is consistent with environment designation and SMP standards. See WAC 173-26-241(3)(h)(ii)(A) – (C)	County: Pages 44 and 45, Section 15 All Cities: Page 20, Section 15	County and Cities of Cashmere, Entiat, Leavenworth, and Wenatchee - Partially Consistent: Policies: need to ensure consistency with Comprehensive Plan provisions for mineral lands of long-term commercial significance. Demonstrate dependency on shoreline location, no net loss, and preference for habitat formation due to mining. Address in-water gravel bar versus shoreland activities. Regulations require consistency with the Surface Mining Reclamation Act and require an HPA by WDFW in a spawning area. However, avoiding impacts, achieving no-net-loss, preference for restoration, and mining reclamation are not addressed. City of Chelan - Not Consistent: No policies on mining are included. Include if relevant to City. Partially Consistent: Regulations analysis same as above.	Consistency: Update per consistency analysis.	Same as County.
Mining waterward of OHWM is prohibited unless:	County: Pages 44 and 45,	Not Consistent: Not addressed.	Consistency: Address per WAC	Same as County.

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
(I) Removal of specified quantities of materials in specified locations will not adversely impact natural gravel transport; (II) The mining will not significantly impact priority species and the ecological functions upon which they depend; and (III) these determinations are integrated with relevant SEPA requirements. WAC 173-26-241(3)(h)(ii)(D)	Section 15 All Cities: Page 20, Section 15		guidelines.	
Renewal, extension, or reauthorization of in-stream and gravel bar mining activities require review for compliance with these new guidelines requirements. WAC 173-26-241(3)(h)(ii)(D)(IV)	County: Pages 44 and 45, Section 15 All Cities: Page 20, Section 15	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines.	Same as County.
Mining within the Channel Migration Zone requires a shoreline conditional use permit. WAC 173-26-241(3)(h)(ii)(E)	County: Pages 44 and 45, Section 15 All Cities: Page 20, Section 15	Not Consistent: Mining is generally permitted in all the Use Environments.	Consistency: Address per WAC guidelines. Make a conditional use permit.	Same as County.
Recreational Development. WAC 173-26-241(3)(i)				
Definition includes both commercial and public recreation developments. WAC 173-26-241(3)(i)	County: Pages 62 and 63, Section 28 All Cities: Pages 36-37, Section 28	Not Consistent: Not defined in Section 7.2. Described in policies.	Consistency: Address per WAC guidelines.	Same as County.
Priority given to recreational development for access to and use of the water. WAC 173-26-241(3)(i)	County: Pages 62 and 63, Section 28 All Cities: Pages 36-37, Section 28	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines.	Same as County.
Location, design and operation of facilities are consistent with purpose of environment designations in which they are allowed. WAC 173-26-241(3)(i)	County: Pages 62 and 63, Section 28 All Cities: Pages 36-37, Section 28	Partially Consistent: The level of intensity of recreation allowed varies by use environment, though many terms are not defined. Standards address minimizing effect of parking but generally few standards are included. County SMP does distinguish parking lot sizes and varies standards based on that.	Consistency: Address per WAC guidelines.	Same as County.
Recreational development achieves no net loss of ecological processes and functions. WAC 173-26-241(3)(i)	County: Pages 62 and 63, Section 28 All Cities: Pages 36-37, Section 28	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines.	Same as County.
Residential Development. WAC 173-26-241(3)(j)				
Definition includes single-family residences, multifamily development, and the creation of new residential lots through land division. WAC 173-26-241(3)(j)	County: Pages 45 to 47, Section 16 All Cities: Pages 21-23, Section 16	Partially Consistent: Definitions of single family and multifamily are provided. Should be reviewed against zoning code definitions. Does not include definition of residential through creation of lots by land division.	Consistency: Update residential definitions per consistency review.	Same as County.
Single-family residences identified as a priority use only when developed in a manner consistent with control of pollution and prevention of damage to the natural environment. WAC 173-26-241(3)(j)	County: Pages 45 to 47, Section 16 All Cities: Pages 21-23, Section 16	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines.	Same as County.

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
No net loss of ecological functions assured with specific standards for setback of structures sufficient to avoid future stabilization, buffers, density, shoreline stabilization, and on-site sewage disposal. WAC 173-26-241(3)(j)	County: Pages 45 to 47, Section 16 All Cities: Pages 21-23, Section 16	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines.	Same as County.
New over-water residences and floating homes prohibited. Appropriate accommodation for existing floating or over-water homes. WAC 173-26-241(3)(j)	County: Pages 45 to 47, Section 16 All Cities: Pages 21-23, Section 16	County - Partially Consistent: Policies prohibit over-water development (e.g. cabanas) constructed on pilings. However, Policies allow for floating homes but not addressed in regulations. All Cities - Not Consistent: Except in Chelan, policies allow for floating homes, but not addressed in regulations. In Chelan, the SMP does not include policies; regulations do not address floating homes. Determine if new floating homes will be prohibited since they are not a preferred use.	Consistency: Address per WAC guidelines.	Same as County.
New multiunit residential development (including subdivision of land for more than four parcels) required to provide community and/or public access in conformance to local public access plans. WAC 173-26-241(3)(j)	County: Pages 45 to 47, Section 16 All Cities: Pages 21-23, Section 16	Partially Consistent: Docks are addressed (Section 21), but not public access. Closest statement: <i>Joint use docket require d for subdivision, multi-family residences, or commercial and industrial enterprises in close proximity to one another.</i>	Consistency: Address per WAC guidelines. Add public access provisions.	Same as County.
New (subdivided) lots required to be designed, configured and developed to: (i) Prevent the loss of ecological functions at full build-out; (ii) Prevent the need for new shoreline stabilization or flood hazard reduction measures; and (iii) Be consistent with applicable SMP environment designations and standards. WAC 173-26-241(3)(j)	County: Pages 45 to 47, Section 16 All Cities: Pages 21-23, Section 16	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines. Reference cluster or PUD requirements or other features of code that can produce outcomes.	Same as County.
Transportation Facilities. WAC 173-26-241(3)(k)				
Proposed transportation and parking facilities required to plan, locate, and design where routes will have the least possible adverse effect on unique or fragile shoreline features, will not result in a net loss of shoreline ecological functions or adversely impact existing or planned water dependent uses. WAC 173-26-241(3)(k)	County: Pages 60 to 61, Section 26 All Cities: Pages 34-35, Section 26	Partially Consistent: Not net loss is not addressed. Closest requirements: <i>setback from OHWM sufficient to leave usable shoreline area in natural condition (26(a)); stream crossings to minimize erosion and disruption to the stream (26((e)) (County only on "e").</i>	Consistency: Update per consistency analysis. Cross reference to applicable critical area regulations.	Same as County.
Circulation system plans include systems for pedestrian, bicycle, and public transportation where appropriate. WAC 173-26-241(3)(k)	Pages 60 to 61, Section 26 All Cities: Pages 34-35, Section 26	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines. Coordinate with adopted transportation plans.	Same as County.
Parking allowed only as necessary to support an authorized shoreline use and which minimize environmental and visual impacts of parking facilities. WAC 173-26-241(3)(k)	Pages 60 to 61, Section 26 All Cities: Pages 34-35, Section 26	Partially Consistent: Parking sometimes addressed in relation to uses, e.g. commercial and recreation.	Consistency: Address per WAC guidelines. Add separate section or address all related uses.	Same as County.
Utilities. WAC 173-26-241(3)(l)				
Design, location and maintenance of utilities required to assure no net loss of ecological functions. WAC 173-26-241(3)(l)	County: Page 60, Section 25 All Cities: Page 34, Section 25	Partially Consistent: Not net loss is not addressed. Closest requirements: <i>keep to minimum widths (25.1.2.b); regrade disturbed areas (25.1.2.c); avoid damage with in-water projects (25.1.2.d) (this one County only).</i>	Consistency: Update per consistency analysis. Cross reference to applicable critical area regulations.	Same as County.
Utilities required to be located in existing rights-of-ways whenever possible. WAC 173-26-241(3)(l)	County: Page 60, Section 25	Chelan County and Cities of Cashmere, Entiat, Leavenworth and Wenatchee - Partially Consistent:	Consistency: Update per consistency analysis. Add into regulations.	Same as County.

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
	All Cities: Page 34, Section 25	Addressed in policy 14.c, but not in regulations. City of Chelan - Not Consistent: No policies or regulations address.		
Utility production and processing facilities and transmission facilities required to be located outside of SMA jurisdiction , unless no other feasible option exists. WAC 173-26-241(3)(l)	County: Page 60, Section 25 All Cities: Page 34, Section 25	Not Consistent: Not addressed.	Consistency: Address per WAC guidelines.	Same as County.
SMP ADMINISTRATIVE PROVISIONS				
The statement: "All proposed uses and development occurring within shoreline jurisdiction must conform to chapter 90.58 RCW, the Shoreline Management Act and this master program" whether or not a permit is required. WAC 173-26-191(2)(a)(iii)(A)	County: Page 38, Section 11 All Cities: Not addressed.	Not Consistent: Exempt activities - not flagged for compliance with SMP despite no requirement for a substantial development permit.	Consistency: Address per WAC guidelines.	Same as County.
Administrative provisions ensure permit procedures and enforcement are conducted in a manner consistent with relevant constitutional limitations on regulation of private property. WAC 173-26-186(5) and WAC 191(2)(a)(iii)(A)	County: Pages 64 to 72 All Cities: Pages 38-44	Consistent: Private property rights are addressed in policies (Section 18; except in the City of Chelan) and a little in regulations (Section 2.2). SMP also includes non-conforming regulations and appeal process.	Other Recommendations: Review non-conforming use provisions against zoning code, and appeal process in relation to land use permit process in other parts of local code.	Same as County.
Identification of specific uses and development that require a shoreline conditional use permit (CUP) . Standards for reviewing CUPs and variances conform to WAC 173-27. WAC 191(2)(a)(iii)(B) and WAC 173-26-241(2)(b)	County and All Cities: Throughout	Partially Consistent: Some uses identified as conditional use permits. WAC guidelines recommend some uses as conditional uses (e.g. in-water mining operations).	Consistency: Address per WAC guidelines. Determine which uses can be permitted with greater attention to development standards, and which should be conditionally permitted.	Same as County.
Administrative, enforcement, and permit review procedures conform to the SMA and state rules (see RCW 90.58.140, 143, 210 and 220 and WAC 173-27). WAC 191(2)(a)(iii)(C), WAC 173-26-201(3)(d)(vi)	County: Pages 64 to 72 All Cities: Pages 38-44	County: Partially Consistent: Criteria for permit approval are similar to SMP guidelines but appear to be out of date. <ul style="list-style-type: none"> • Recommend including shoreline substantial development permit review criteria to allow conditions to the approval of permits per WAC 173-27. • Recommend updating CUP criteria per WAC 173-27 to address compatibility with future comprehensive plan and SMP uses, addressing WAC provisions to ensure no significant adverse impacts, consideration of cumulative impacts, etc. • Recommend updating Variance criteria per WAC 173-27 to address criteria for upland versus in-water requests. All Cities: <ul style="list-style-type: none"> • Recommend including shoreline substantial development permit review criteria per WAC 173-27. • Recommend updating Variance criteria and adding CUP criteria per WAC 173-27. 	Consistency: Address per WAC guidelines.	Same as County.
Mechanism for tracking, and periodically evaluating the cumulative effects of all project review actions in shoreline areas. WAC 173-26-191(2)(a)(iii)(D)	Not addressed	Not Consistent: Not addressed. SMP update process to include cumulative effects analysis and will set baseline for future adaptive management efforts.	Consistency: Address per WAC guidelines. Cumulative analysis will be part of the SMP Update. Incorporate appropriate adaptive management provisions.	Same as County.

DRAFT Chelan County Shoreline Management Recommendations

State Rule (WAC) Requirements	Location in Current SMP(s)	Consistency Analysis	Recommendation	
			County	Cities
SMP definitions are consistent with all definitions in WAC 173-26-020, and other relevant WACs.	County: Pages 23 to 34, Section 7 All Cities: Pages 3 to 13	Not Consistent: Definitions are out of date and not consistent with newer WAC guidelines in some cases. Need to address new uses and activities not anticipated in adopted SMP. Should remove definitional language from goals, policies, and regulations.	Consistency: Address per WAC guidelines and consistency review. Consider definitions in local government code.	Same as County.

3. ENVIRONMENT DESIGNATION RECOMMENDATIONS

3.1 Background

As outlined in WAC 173-26-191(1)(d), “Shoreline management must address a wide range of physical conditions and development settings along shoreline areas. Effective shoreline management requires that the shoreline master program prescribe different sets of environmental protection measures, allowable use provisions, and development standards for each of these shoreline segments.” In WAC 173-26-211(2)(a), the Guidelines further direct development and assignment of environment designations based on “existing use pattern, the biological and physical character of the shoreline, and the goals and aspirations of the community as expressed through comprehensive plans...”⁴

As discussed in some detail already in Table 1, the current SMP utilizes a system of four environment designations: Natural, Conservancy, Rural, and Urban. These are listed in order by increasing level of use, and the definitions for each are provided in Table 2 below. In general, Urban is assigned to each City, its UGA, and highly developed areas at the time of the 1975 SMP. Natural, the other end of the spectrum, is found along only a few waterbodies, such as the White River primarily below the confluence with the Napeequa River, the right bank of the Wenatchee River between the Chiwawa River and Leavenworth, the lower part of the Little Wenatchee River, and along short sections of a few other waterbodies. Conservancy and Rural are the most common designations in the current SMP, and are differentiated primarily by level of intensity of agricultural and recreational use.

The County recently updated its critical areas regulations, and included shoreline-specific buffers based on the current environment designation system. For this reason, it is anticipated that the County will maintain its four-level environment designation system, at least by name. These loosely defined environments should be updated with clear statements of purpose, designation criteria, and regulations and policies. An Aquatic environment designation should also be added, consistent with the Guidelines. Because the current SMP did not map environments within federal lands, and because of differential treatment of federal lands with respect to the County’s critical areas regulations and other regulatory or permitting procedures, federal lands will be assigned a separate environment designation titled Federal.

⁴ The methodology discussion in Section 3.2 below describes how the function analysis scores presented in the *Shoreline Inventory and Analysis* report were considered in assigning preliminary designations.

DRAFT Chelan County Shoreline Management Recommendations

Table 2. Summary of the Current SMP and Ecology’s Recommended Environment Designation Systems.

County/City Current SMP Designations	County Definition	Ecology SMP Designations	Summary of Ecology’s Designation Criteria (WAC 173-26-211)
Natural	“area containing some unique natural or cultural features considered valuable in a natural or original condition which are relatively intolerant of intensive human uses”	Natural	“shoreline is ecologically intact ... 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”
Conservancy	“area characterized by a potential for diffuse outdoor recreation activities, timber harvesting on a sustained yield basis, passive agricultural uses such as pasture and range lands, and other related development”	Urban Conservancy	“suitable for water-related or water-enjoyment uses;” “open space, flood plain or other sensitive areas that should not be more intensively developed;” “potential for ecological restoration;” “retain important ecological functions, even though partially developed;” “have the potential for development that is compatible with ecological restoration”
Rural	“area characterized by intensive agricultural and recreational uses and those areas having a high capability to support active agricultural practices or intensive recreational development”	Rural Conservancy	“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;” “currently accommodating residential uses outside urban growth areas and incorporated cities;” “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;” “high recreational value or with unique historic or cultural resources;” “shoreline has low-intensity water-dependent uses”
Urban	“area of high intensity land use including residential, commercial, and industrial development in addition to open space and public uses	High Intensity	“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”

DRAFT Chelan County Shoreline Management Recommendations

County/City Current SMP Designations	County Definition	Ecology SMP Designations	Summary of Ecology's Designation Criteria (WAC 173-26-211)
		Shoreline Residential	"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"
		Aquatic	"lands waterward of the ordinary high-water mark"

Table 3 illustrates the approximate correlation between the current SMP environment designations and Ecology's recommended environment designations.

Table 3. Correlation between Current SMP Environment Designations and Ecology's Recommended Environment Designations.

Ecology SMP Designations	County/City Current SMP Designations			
	Natural	Urban	Conservancy	Rural
Natural	X			
Rural Conservancy			X	X
Urban Conservancy		X		X
High Intensity		X		
Shoreline Residential	Only the Urban designation mentions "residential" in definition, but all environments allow single-family and multi-family is only prohibited in the Natural environment			
Aquatic	In- and over-water uses are addressed in the current SMP's policies and regulations. There is no discrete environment designation.			

Because the Cities have not linked their critical areas regulations to the current SMP environment designations, and because the Cities have expressed a desire for greater differentiation between unique shoreline areas, a new environment designation system is proposed consistent generally with the Guidelines suggested system. The Guidelines recommend use of six unique environments, five of which may be appropriate for Cities and their UGAs: Aquatic, Natural,

DRAFT Chelan County Shoreline Management Recommendations

Urban Conservancy, Shoreline Residential, and High-Intensity (see Table 2 above for Ecology's suggested designation criteria for each of these designations).

The Cities have been consulted about their environment designation preferences. Based on those discussions, the City of Chelan will be sub-dividing the Shoreline Residential environment into single-family development and multi-family development. The Cities of Wenatchee and Entiat will also add special designations for their waterfront areas consistent with their recently developed Waterfront Plans. The UGAs associated with each City have been preliminarily pre-designated consistent with the City model, and the intent is that the County would adopt those designations and standards as part of its SMP.

3.2 Methodology

It is difficult to describe a methodology for environment designation recommendations as there are very few firm "rules." In general, the following GIS data was reviewed for each of the 960 segments before an environment designation was recommended:

- Current land use
- Ownership (to isolate federal designations from others)
- Wetlands
- Floodplains
- Vegetation
- Impervious surface
- Function scores (provided in Section 5.2 of the *Shoreline Inventory and Analysis* report)

Because there are no detailed environment designation purposes or criteria at this stage, there are no clear thresholds for distinguishing between Natural and Conservancy, between Conservancy and Rural, and between Rural and Urban. For that reason, many of the segments in the tables below include two potential environment designations.

While current land use and ownership provided basic context for the segment, the recommended environment designations do not always correlate strongly with those parameters except in the case of a Federal suffix to the environment designation on federal lands. County parcels are often quite large, and extend well beyond shoreline jurisdiction. For example, while the current land use code may indicate a single-family residential use, the actual development may not be in shoreline jurisdiction and would therefore not have necessarily resulted in adverse impacts to shoreline condition. The vegetation and impervious surface data were better gages of alteration in shoreline jurisdiction. For this reason, parcels that have a current or planned land use of residential (or other

designation allowing alteration) may have a Conservancy or even Natural environment designation. The parcel can still accommodate the use, perhaps even in shoreline jurisdiction, and satisfy the WAC requirements for consistency between the environment designations and the Comprehensive Plans (see WAC 173-26-211(3) for additional detail about consistency requirements). In Cities, current land use was more strongly correlated with level of alteration and the resulting environment designation because more often the entire parcel or a large portion of the parcel is in shoreline jurisdiction.

In general, Natural was the recommended designation when impervious surface percentages were very low; when wetlands and floodplain percentages were high; when vegetation was primarily forest, scrub-shrub or various types of wetlands; and when the function score was 3.0 or greater.

Conservancy was the most common recommended environment designation in the County, and was applied to lands when impervious surface percentages were low (often less than 10); when wetlands and floodplain percentages were low to moderate (absence of these does not indicate alteration or poor function); when vegetation was primarily forest, scrub-shrub or various types of wetlands; and when function scores were typically in the mid- to high 2s.

Rural differed from Conservancy by degrees, and usually had high impervious surface percentages and high percentages of vegetation in the “developed” categories. Function scores were often in the low 2s or high 1s.

Urban was the least frequently recommended environment designation in the County, and was limited to some LAMIRD areas and UGAs not associated with an incorporated city (e.g., parts of Peshastin and Manson).

In the Cities, Ecology’s environment designations were assigned consistent with the criteria outlined in the WAC as included in Table 1 above, the function scores presented in Chapter 5 of the *Shoreline Inventory and Analysis* report, and in Table 2.

3.3 Recommendations

The following sections provide tables of preliminary recommended environment designations by reach for the County (organized by WRIA) and each City and its UGA. These initial recommendations will require refinement after revisions to the model as described above; development of more detailed environment designation purpose and criteria; and input of the County, Cities, Advisory Committee and others. In the City tables (Tables 8 – 12), notations of “split” indicate that the segment will likely be divided perpendicular to the waterbody and each sub-segment given a different environment designation. Notations of

DRAFT Chelan County Shoreline Management Recommendations

“parallel” indicate that different environment designations may be assigned to sub-segments divided parallel to the water.

3.3.1 Chelan County

Table 4. Preliminary Environment Designation Recommendations by Reach in WRIA 40a/b.

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Colockum Creek 1	Conservancy	Columbia River 10	Rural
Colockum Creek 2	Conservancy	Columbia River 11	Conservancy
Colockum Creek 3	Conservancy	Cortez Lake 1	Urban
Columbia River 01	Conservancy	Cortez Lake 2	Urban
Columbia River 02	Conservancy	Meadow Lake 1	Conservancy
Columbia River 03	Conservancy	Meadow Lake 2	Conservancy
Columbia River 04	Conservancy	Spring Hill Reservoir 1	Conservancy
Columbia River 05	Conservancy	Spring Hill Reservoir 2	Conservancy
Columbia River 06	Conservancy	Stemilt Project Reservoir 1	Conservancy
Columbia River 07	Conservancy	Upper Wheeler Reservoir 2	Conservancy
Columbia River 08	Rural	Upper Wheeler Reservoir1	Conservancy
Columbia River 09	Rural		

Table 5. Preliminary Environment Designation Recommendations by Reach in WRIA 45.

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Big Meadow Creek 1	Federal	Nada Lake 1	Federal
Boulder Creek 2 1	Federal	Napeequa River 01L	Conservancy
Buck Creek 1	Federal	Napeequa River 01R	Conservancy
Buck Creek 2	Federal	Napeequa River 02L	Conservancy
Buck Creek 3	Federal	Napeequa River 03L	Federal
Buck Creek 4	Federal	Napeequa River 04	Federal
Buck Creek 5	Federal	Napeequa River 05	Federal
Buck Creek 6	Federal	Napeequa River 06	Federal
Cady Creek 1	Federal	Napeequa River 07	Federal
Chikamin Creek 1	Conservancy or Natural	Napeequa River 08	Federal
Chikamin Creek 2	Conservancy	Napeequa River 09	Federal
Chikamin Creek 3	Federal	Napeequa River 10	Federal
Chikamin Creek 4	Conservancy	Nason Creek 01	Federal
Chikamin Creek 5	Federal	Nason Creek 02	Federal
Chiwaukum Creek 1	Federal	Nason Creek 03	Natural

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Chiwaukum Creek 2	Federal	Nason Creek 04	Federal
Chiwaukum Creek 3	Federal	Nason Creek 05	Conservancy/ Federal
Chiwaukum Creek 4	Conservancy or Rural	Nason Creek 06	Conservancy
Chiwaukum Creek 5	Federal	Nason Creek 07	Natural or Conservancy
Chiwaukum Creek 6	Conservancy	Nason Creek 08	Federal
Chiwaukum Creek 7	Federal	Nason Creek 09	Conservancy/ Federal
Chiwaukum Creek 8	Federal	Nason Creek 10	Conservancy/ Federal
Chiwaukum Creek South Fork 1L	Federal	Nason Creek 11	Rural/ Federal
Chiwaukum Creek South Fork 1R	Federal	Nason Creek 12	Federal
Chiwaukum Lake 1	Federal	Nason Creek 13	Federal
Chiwawa River 01L	Natural	Panther Creek 1L	Federal
Chiwawa River 01R	Natural	Panther Creek 1R	Federal
Chiwawa River 02L	Federal	Panther Creek 2L	Federal
Chiwawa River 02R	Natural	Panther Creek 2R	Federal
Chiwawa River 03L	Natural	Panther Creek 3L	Federal
Chiwawa River 03R	Federal	Perfection Lake 1	Federal
Chiwawa River 04L	Natural	Perfection Lake 2	Federal
Chiwawa River 04R	Rural or Conservancy	Peshastin Creek 01L	Conservancy
Chiwawa River 05L	Rural or Conservancy	Peshastin Creek 01R	Conservancy
Chiwawa River 05R	Natural	Peshastin Creek 02L	Conservancy
Chiwawa River 06L	Natural	Peshastin Creek 02R	Rural
Chiwawa River 06R	Federal	Peshastin Creek 03L	Rural
Chiwawa River 07L	Federal	Peshastin Creek 03R	Conservancy or Rural
Chiwawa River 07R	Federal	Peshastin Creek 04L	Rural
Chiwawa River 08L	Federal	Peshastin Creek 04R	Conservancy
Chiwawa River 08R	Federal	Peshastin Creek 05L	Conservancy or Rural
Chiwawa River 09L	Federal	Peshastin Creek 05R	Conservancy or Rural
Chiwawa River 09R	Federal	Peshastin Creek 06L	Rural
Chiwawa River 10L	Federal	Peshastin Creek 06R	Rural
Chiwawa River 10R	Federal	Peshastin Creek 07L	Conservancy or Rural
Chiwawa River 11L	Federal	Peshastin Creek 07R	Conservancy
Chiwawa River 11R	Federal	Peshastin Creek 08L	Rural
Chiwawa River 12L	Federal	Peshastin Creek 08R	Conservancy
Chiwawa River 13L	Federal	Peshastin Creek 09L	Conservancy
Chiwawa River 14L	Federal	Peshastin Creek 09R	Conservancy or Natural
Chiwawa River 15L	Natural	Peshastin Creek 10L	Rural or Conservancy
Chiwawa River 16L	Federal	Peshastin Creek 10R	Conservancy
Chiwawa River 17	Federal	Peshastin Creek 11L	Conservancy
Chiwawa River 18	Federal	Peshastin Creek 11R	Conservancy or

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
			Natural
Chiwawa River 19	Federal	Peshastin Creek 12L	Conservancy
Chiwawa River 20	Federal	Peshastin Creek 12R	Conservancy or Rural
Chiwawa River 21	Federal	Peshastin Creek 13L	Conservancy
Chiwawa River 22	Federal	Peshastin Creek 13R	Conservancy or Rural
Chiwawa River 23	Federal	Peshastin Creek 14L	Federal
Chumstick Creek 1L	Rural	Peshastin Creek 14R	Conservancy or Rural
Chumstick Creek 1R	Rural or Urban	Peshastin Creek 15L	Conservancy
Chumstick Creek 2L	Rural or Urban	Peshastin Creek 15R	Conservancy or Rural
Chumstick Creek 2R	Rural or Urban	Peshastin Creek 16L	Conservancy
Chumstick Creek 3L	Rural or Urban	Peshastin Creek 16R	Conservancy
Colchuck Lake 1	Federal	Peshastin Creek 17L	Conservancy or Rural
Columbia River 12	Urban or Rural	Peshastin Creek 17R	Federal
Columbia River 13	Urban or Rural	Peshastin Creek 18L	Federal
Columbia River 14	Urban or Rural	Peshastin Creek 18R	Conservancy or Rural
Cougar Creek 1	Federal	Peshastin Creek 19R	Conservancy
Eightmile Creek 1L	Federal	Peshastin Creek 20R	Rural
Eightmile Creek 1R	Federal	Peshastin Creek 21R	Rural
Eightmile Creek 2L	Federal	Peshastin Creek 22R	Rural
Eightmile Creek 2R	Federal	Peshastin Creek 23R	Federal
Eightmile Creek 3L	Federal	Phelps Creek 1	Federal
Eightmile Creek 3R	Federal	Phelps Creek 2	Federal
Eightmile Creek 4L	Federal	Phelps Creek 3	Federal
Eightmile Creek 5L	Federal	Phelps Creek 4	Federal
Eightmile Lake 1	Federal	Phelps Creek 5	Federal
Fish Creek 2 1	Federal	Phelps Creek 6	Federal
Fish Lake 1	Natural	Pole Creek 1	Federal
Fish Lake 2	Federal	Prospect Creek 1	Federal
Fish Lake 3	Federal	Rainy Creek 1L	Federal
Fish Lake 4	Conservancy	Rainy Creek 1R	Federal
Fish Lake 5	Federal	Roaring Creek 1	Natural
Fish Lake 6	Federal	Rock Creek 1	Federal
Fish Lake 7	Federal	Rock Creek 2	Federal
French Creek 1	Federal	Rock Creek 3	Federal
French Creek 2	Federal	Rock Creek 4	Federal
Glasses Lake 1	Federal	Schaefer Lake 1	Federal
Heather Lake 1	Federal	Schaefer Lake 2	Federal
Heather Lake 2	Federal	Shield Lake 1	Federal
Ibex Creek 1	Federal	Shield Lake 2	Federal
Icicle Creek 01L	Conservancy or Natural	Snow Lake Lower 1	Federal
Icicle Creek 01R	Conservancy or Natural	Snow Lake Lower 2	Federal
Icicle Creek 02L	Conservancy or Natural	Snow Lake Lower 3	Federal
Icicle Creek 02R	Natural	Snow Lake Upper 1	Federal
Icicle Creek 03L	Natural	Snow Lake Upper 2	Federal
Icicle Creek 03R	Conservancy or Natural	Snow Lake Upper 3	Federal

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Icicle Creek 04L	Conservancy	Snowall Creek 1	Federal
Icicle Creek 04R	Conservancy or Natural	Square Lake 1	Federal
Icicle Creek 05L	Conservancy	Square Lake 2	Federal
Icicle Creek 05R	Conservancy or Natural	Stuart Lake 1	Federal
Icicle Creek 06L	Conservancy	Theseus Lake 1	Federal
Icicle Creek 06R	Rural or Conservancy	Theseus Lake 2	Federal
Icicle Creek 07L	Rural or Conservancy	Thunder Creek 1	Federal
Icicle Creek 07R	Conservancy or Natural	Trapper Creek 1	Federal
Icicle Creek 08L	Rural or Conservancy	Trapper Creek 2	Federal
Icicle Creek 08R	Rural or Conservancy	Trout Creek 2	Federal
Icicle Creek 09L	Rural or Conservancy	Twin Lakes 1 1	Federal
Icicle Creek 09R	Rural or Conservancy	Twin Lakes 1 2	Federal
Icicle Creek 10L	Rural or Conservancy	Twin Lakes 2 1	Federal
Icicle Creek 10R	Conservancy	Twin Lakes 2 2	Federal
Icicle Creek 11L	Federal	Wenatchee River 01L	Natural
Icicle Creek 11R	Conservancy or Natural	Wenatchee River 01R	Conservancy or Natural
Icicle Creek 12L	Natural	Wenatchee River 02L	Conservancy
Icicle Creek 12R	Natural	Wenatchee River 02R	Natural
Icicle Creek 13L	Rural or Conservancy	Wenatchee River 03L	Rural or Conservancy
Icicle Creek 13R	Natural	Wenatchee River 03R	Conservancy
Icicle Creek 14L	Federal	Wenatchee River 04L	Rural or Conservancy
Icicle Creek 14R	Conservancy or Natural	Wenatchee River 04R	Conservancy
Icicle Creek 15L	Federal	Wenatchee River 05L	Rural or Conservancy
Icicle Creek 15R	Conservancy or Natural	Wenatchee River 05R	Rural or Conservancy
Icicle Creek 16L	Conservancy or Natural	Wenatchee River 06L	Conservancy
Icicle Creek 16R	Federal	Wenatchee River 06R	Rural or Conservancy
Icicle Creek 17L	Conservancy or Natural	Wenatchee River 07L	Rural
Icicle Creek 17R	Conservancy	Wenatchee River 07R	Conservancy
Icicle Creek 18L	Federal	Wenatchee River 08L	Rural
Icicle Creek 18R	Conservancy	Wenatchee River 08R	Conservancy
Icicle Creek 19L	Federal	Wenatchee River 09L	Rural
Icicle Creek 19R	Federal	Wenatchee River 09R	Rural or Conservancy
Icicle Creek 20L	Conservancy	Wenatchee River 10L	Rural or Conservancy
Icicle Creek 20R	Federal	Wenatchee River 10R	Conservancy
Icicle Creek 21L	Federal	Wenatchee River 11L	Conservancy
Icicle Creek 21R	Federal	Wenatchee River	Rural or Conservancy

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
		11R	
Icicle Creek 22L	Federal	Wenatchee River 12L	Conservancy
Icicle Creek 22R	Federal	Wenatchee River 12R	Conservancy
Icicle Creek 23L	Federal	Wenatchee River 13L	Rural or Urban
Icicle Creek 23R	Conservancy	Wenatchee River 13R	Conservancy
Icicle Creek 24L	Conservancy	Wenatchee River 14L	Conservancy
Icicle Creek 24R	Federal	Wenatchee River 14R	Conservancy
Icicle Creek 25L	Federal	Wenatchee River 15L	Rural or Conservancy
Icicle Creek 25R	Conservancy	Wenatchee River 15R	Rural
Icicle Creek 26L	Conservancy	Wenatchee River 16L	Conservancy
Icicle Creek 26R	Federal	Wenatchee River 16R	Rural
Icicle Creek 27L	Federal	Wenatchee River 17L	Rural or Conservancy
Icicle Creek 27R	Conservancy	Wenatchee River 17R	Rural or Conservancy
Icicle Creek 28R	Federal	Wenatchee River 18L	Conservancy or Natural
Icicle Creek 29	Federal	Wenatchee River 18R	Conservancy
Icicle Creek 30	Federal	Wenatchee River 19L	Conservancy or Natural
Icicle Creek 31	Federal	Wenatchee River 19R	Conservancy
Icicle Creek 32	Federal	Wenatchee River 20L	Conservancy
Icicle Creek 33	Federal	Wenatchee River 20R	Conservancy or Natural
Icicle Creek 34	Federal	Wenatchee River 21L	Federal
Icicle Creek 35	Federal	Wenatchee River 21R	Natural
Indian Creek 1	Federal	Wenatchee River 22L	Federal
Indian Creek 2	Federal	Wenatchee River 22R	Conservancy
Indian Creek 3	Federal	Wenatchee River 23L	Rural / Federal
Indian Creek 4	Federal	Wenatchee River 23R	Conservancy / Federal
Ingalls Creek 1L	Conservancy	Wenatchee River 24L	Federal
Ingalls Creek 1R	Conservancy	Wenatchee River 24R	Federal
Ingalls Creek 2	Federal	Wenatchee River 25L	Federal
Ingalls Creek 3	Federal	Wenatchee River 25R	Conservancy
Jack Creek 1	Federal	Wenatchee River 26L	Natural
Jack Creek 2	Federal	Wenatchee River 26R	Federal
Josephine Lake 1	Federal	Wenatchee River 27L	Conservancy or Natural
Josephine Lake 2	Federal	Wenatchee River	Federal

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
		27R	
Klonaqua Lakes (1) Lower 1	Federal	Wenatchee River 28L	Conservancy
Klonaqua Lakes (2) Upper 1	Federal	Wenatchee River 28R	Federal
Klonaqua Lakes (2) Upper 2	Federal	Wenatchee River 29L	Natural or Conservancy
Klonaqua Lakes (2) Upper 3	Federal	Wenatchee River 29R	Conservancy
Lake Augusta 1	Federal	Wenatchee River 30L	Conservancy
Lake Creek 2 1	Federal	Wenatchee River 30R	Federal
Lake Creek 2 2	Federal	Wenatchee River 31L	Federal
Lake Leland 1	Federal	Wenatchee River 31R	Conservancy
Lake Valhalla 1	Federal	Wenatchee River 32L	Federal
Lake Valhalla 2	Federal	Wenatchee River 32R	Conservancy
Lake Victoria 1	Federal	Wenatchee River 33L	Conservancy
Lake Wenatchee 01	Rural	Wenatchee River 33R	Rural or Conservancy
Lake Wenatchee 02	Federal	Wenatchee River 34L	Federal
Lake Wenatchee 03	Rural	Wenatchee River 34R	Conservancy
Lake Wenatchee 04	Federal	Wenatchee River 35L	Federal
Lake Wenatchee 05	Rural	Wenatchee River 35R	Conservancy
Lake Wenatchee 06	Federal	Wenatchee River 36L	Federal
Lake Wenatchee 07	Conservancy	Wenatchee River 36R	Federal
Lake Wenatchee 08	Natural	Wenatchee River 37L	Federal
Lake Wenatchee 09	Conservancy	Wenatchee River 37R	Federal
Lake Wenatchee 10	Federal	Wenatchee River 38R	Natural
Lake Wenatchee 11	Federal	Wenatchee River 39R	Natural
Lake Wenatchee 12	Natural	Wenatchee River 40R	Conservancy / Federal
Lake Wenatchee 13	Federal	White River 01L	Federal
Larch Lake 1	Federal	White River 01R	Federal
Larch Lake 2	Federal	White River 02L	Natural
Leland Creek 1	Federal	White River 02R	Natural
Lichtenwasser Lake 1	Federal	White River 03L	Natural
Lightning Creek 1	Federal	White River 03R	Natural
Little Wenatchee 01	Natural/ Federal	White River 04L	Natural
Little Wenatchee 02	Federal	White River 04R	Natural
Little Wenatchee 03	Natural	White River 05L	Natural
Little Wenatchee 04	Federal	White River 05R	Natural
Little Wenatchee 05	Federal	White River 06L	Federal

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Little Wenatchee 06	Federal	White River 06R	Federal
Little Wenatchee 07	Federal	White River 07L	Conservancy / Federal
Little Wenatchee 08	Federal	White River 07R	Federal
Little Wenatchee 09	Federal	White River 08L	Natural
Little Wenatchee 10	Federal	White River 08R	Federal
Little Wenatchee 11	Federal	White River 09L	Natural
Little Wenatchee 12	Federal	White River 09R	Federal
Little Wenatchee 13	Federal	White River 10L	Natural
Little Wenatchee 14	Federal	White River 10R	Federal
Loch Eileen Lake 1	Federal	White River 11L	Natural
Loch Eileen Lake 2	Federal	White River 11R	Federal
Lost Lake 1	Federal	White River 12L	Federal
Meadow Creek 1	Federal	White River 12R	Federal
Mill Creek 1	Federal	White River 13L	Federal
Mill Creek 2	Federal	White River 13R	Federal
Mill Creek 3	Federal	White River 14L	Natural
Mission Creek 1L	Rural	White River 15L	Federal
Mission Creek 1R	Rural	White River 16L	Federal
Mission Creek 2L	Conservancy	White River 17L	Federal
Mission Creek 2R	Conservancy	White River 18L	Federal
Mission Creek 3L	Conservancy	White River 19L	Federal
Mission Creek 3R	Conservancy	White River 20L	Federal
Mission Creek 4L	Conservancy	White River 21L	Federal
Mission Creek 4R	Conservancy	Whitepine Creek 1	Federal
Mission Creek 5L	Conservancy	Whitepine Creek 2	Federal
Mission Creek 5R	Conservancy	Whitepine Creek 3	Federal
Mountaineer Creek 1	Federal	Whitepine Creek 4	Federal
Mountaineer Creek 2	Federal	Wildhorse Creek 1	Federal
Mountaineer Creek 3	Federal		

Table 6. Preliminary Environment Designation Recommendations by Reach in WRIA 46.

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Columbia River 15	Rural or Conservancy	Entiat River 21R	Conservancy
Columbia River 16	Conservancy	Entiat River 22L	Federal
Columbia River 17	Conservancy or Natural	Entiat River 22R	Conservancy
Columbia River 18	Conservancy	Entiat River 23L	Conservancy
Columbia River 19	Conservancy	Entiat River 23R	Federal
Columbia River 20	Rural	Entiat River 24L	Federal
Columbia River 21	Conservancy	Entiat River 24R	Conservancy
Columbia River 22	Rural	Entiat River 25L	Conservancy

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Columbia River 23	Conservancy	Entiat River 25R	Federal
Columbia River 24	Rural or Conservancy	Entiat River 26R	Natural
Columbia River 25	Rural	Entiat River 27R	Federal
Columbia River 26	Rural or Conservancy	Entiat River 28R	Natural
Columbia River 27	Conservancy or Natural	Entiat River 29R	Natural
Columbia River 28	Rural or Conservancy	Entiat River 30R	Natural
Columbia River 29	Conservancy	Entiat River 31R	Natural
Columbia River 30	Conservancy	Entiat River 32R	Natural
Columbia River 31	Conservancy	Entiat River 33R	Federal
Entiat River 01L	Rural	Entiat River 34R	Natural
Entiat River 01R	Conservancy	Entiat River 35R	Federal
Entiat River 02L	Conservancy or Natural	Entiat River 36R	Federal
Entiat River 02R	Conservancy	Entiat River 37R	Federal
Entiat River 03L	Conservancy	Entiat River 38R	Conservancy
Entiat River 03R	Conservancy or Natural	Entiat River 39	Federal
Entiat River 04L	Conservancy	Entiat River 40	Federal
Entiat River 04R	Natural	Entiat River 41	Federal
Entiat River 05L	Conservancy	Entiat River 42	Federal
Entiat River 05R	Conservancy or Rural	Entiat River 43	Federal
Entiat River 06L	Conservancy	Entiat River 44	Federal
Entiat River 06R	Conservancy	Ice Creek 1	Federal
Entiat River 07L	Conservancy or Natural	Ice Lakes 1 1	Federal
Entiat River 07R	Conservancy or Natural	Ice Lakes 2 1	Federal
Entiat River 08L	Conservancy	Lake Creek 1	Federal
Entiat River 08R	Conservancy	Mad River 01	Conservancy or Rural
Entiat River 09L	Conservancy	Mad River 02	Conservancy or Rural
Entiat River 09R	Conservancy or Natural	Mad River 03L	Federal
Entiat River 10L	Natural	Mad River 03R	Federal
Entiat River 10R	Conservancy	Mad River 04L	Federal
Entiat River 11L	Rural	Mad River 04R	Federal
Entiat River 11R	Conservancy	Mad River 05L	Federal
Entiat River 12L	Conservancy	Mad River 05R	Federal
Entiat River 12R	Natural	Mad River 06L	Federal
Entiat River 13L	Conservancy	Mad River 06R	Natural
Entiat River 13R	Conservancy or Natural	Mad River 07L	Federal
Entiat River 14L	Conservancy	Mad River 07R	Federal
Entiat River 14R	Conservancy	Mad River 08L	Federal
Entiat River 15L	Rural	Mad River 08R	Federal
Entiat River 15R	Natural	Mad River 09L	Federal
Entiat River 16L	Federal	Mad River 09R	Federal
Entiat River 16R	Natural / Federal	Mad River 10L	Federal
Entiat River 17L	Natural	Mad River 10R	Federal
Entiat River 17R	Conservancy	Mad River 11L	Federal
Entiat River 18L	Natural	Mad River 11R	Federal

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Entiat River 18R	Conservancy or Natural	Mad River 12L	Federal
Entiat River 19L	Conservancy	Mad River 12R	Federal
Entiat River 19R	Conservancy or Rural	Mad River 13L	Federal
Entiat River 20L	Federal	North Fork Entiat River 1	Federal
Entiat River 20R	Conservancy	Tommy Creek 1	Federal
Entiat River 21L	Natural		

Table 7. Preliminary Environment Designation Recommendations by Reach in WRIA 47.

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Agnes 1	Federal	Lake Chelan 63	Rural
Antilon Lake 1	Rural or Conservancy	Lake Chelan 64	Rural
Antilon Lake 2	Natural	Lake Chelan 65	Rural
Basin 1	Federal	Lake Chelan 66	Rural
Boulder 1	Federal	Lake Chelan 67	Rural
Boulder 2	Federal	Lake Chelan 68	Rural
Bridge 1	Federal	Lake Chelan 69	Rural or Conservancy
Bridge 2	Federal	Lake Chelan 70	Rural
Bridge 3	Federal	Lake Chelan 71	Federal
Chelan River 1	Conservancy	Lake Chelan 72	Federal
Chelan River 2	Conservancy or Natural	Lake Chelan 73	Rural
Chelan River 3	Rural	Lake Chelan 74	Rural
Chelan River 4	Conservancy or Natural	Lake Chelan 75	Rural
Chelan River 5	Conservancy	Lake Chelan 76	Federal
Columbia River 31	Conservancy	Lake Chelan 77	Federal
Columbia River 32	Conservancy	Lake Chelan 78	Federal
Columbia River 33	Natural or Conservancy	Lake Chelan 79	Federal
Columbia River 34	Natural or Conservancy	Lake Chelan 80	Federal
Columbia River 35	Conservancy or Rural	Lake Chelan 81	Federal
Columbia River 36	Conservancy	Lake Chelan 82	Federal
Columbia River 37	Conservancy	Lake Chelan 83	Federal
Columbia River 38	Conservancy	Lake Chelan 84	Federal
Columbia River 39	Conservancy or Rural	Lake Chelan 85	Federal
Columbia River 40	Conservancy or Rural	Lake Chelan 86	Federal
Columbia River 41	Conservancy	Lake Chelan 87	Federal
Columbia River 42	Conservancy	Lake Chelan 88	Federal
Columbia River 43	Rural or Conservancy	Lake Chelan 89	Conservancy / Federal
Columbia River 44	Conservancy or Rural	Lake Chelan 90	Federal
Columbia River 45	Conservancy or Rural	Lake Chelan 91	Federal

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Columbia River 46	Conservancy	Lake Chelan 92	Federal
Columbia River 47	Conservancy or Natural	Lake Chelan 93	Federal
Columbia River 48	Rural	Lake Chelan 94	Federal
Columbia River 49	Conservancy or Rural	Lyman 1	Federal
Columbia River 50	Conservancy or Natural	Maple 1	Federal
Columbia River 51	Conservancy or Natural	McAlester 1	Federal
Columbia River 52	Conservancy or Natural	Mirror 1	Federal
Columbia River 53	Rural / Federal	NF Bridge 1	Federal
Columbia River 54	Conservancy or Natural	NF Bridge 2	Federal
Columbia River 55	Conservancy or Natural	NF Bridge 3	Federal
Columbia River 56	Natural or Conservancy	North Thirtyfive Mile Creek 1	Federal
Columbia River 57	Conservancy	Park 1	Federal
Columbia River 58	Conservancy	Park 2	Federal
Company 1	Federal	Park 3	Federal
Company 2	Federal	Park 4	Federal
Company 3	Federal	Park 5	Federal
Company 4	Federal	Park 6	Federal
Cottonwood 1	Federal	Prince Creek 1L	Federal
Cub Lake 1	Federal	Prince Creek 1R	Federal
Domke 1	Federal	Prince Creek 2R	Federal
Doubtful 1	Federal	Railroad Creek 1L	Federal
Doubtful Creek 1	Federal	Railroad Creek 1R	Federal
Dry Lake 1	Rural	Railroad Creek 2L	Federal
Dry Lake 2	Rural	Railroad Creek 2R	Federal
Dry Lake 3	Conservancy or Rural	Railroad Creek 3L	Federal
Fish Creek 1 1	Federal / Natural	Railroad Creek 3R	Federal
Fish Creek 1 2	Federal	Railroad Creek 4L	Federal
Flat 1	Federal	Railroad Creek 4R	Federal
Flat 2	Federal	Railroad Creek 5L	Federal
Flat 3	Federal	Railroad Creek 5R	Federal
Green 1	Federal	Railroad Creek 6L	Federal
Hart 1	Federal	Railroad Creek 6R	Federal
Lake Chelan 01	Federal	Railroad Creek 7L	Federal
Lake Chelan 02	Federal	Rainbow 1	Federal
Lake Chelan 03	Federal	Rainbow 2	Federal
Lake Chelan 04	Federal	Rainbow 3	Federal
Lake Chelan 05	Federal	Rainy 1	Federal
Lake Chelan 06	Federal	Rainy 2	Federal
Lake Chelan 07	Conservancy / Federal	Rimrock 1	Federal
Lake Chelan 08	Federal	Roses Lake 1	Natural
Lake Chelan 09	Federal	Roses Lake 2	Conservancy
Lake Chelan 10	Federal	Roses Lake 3	Conservancy

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Lake Chelan 11	Federal	Roses Lake 4	Conservancy
Lake Chelan 12	Federal	Roses Lake 5	Conservancy or Natural
Lake Chelan 13	Federal	SF Agnes 1	Federal
Lake Chelan 14	Federal	SF Bridge 1	Federal
Lake Chelan 15	Natural or Conservancy	SF Flat 1	Federal
Lake Chelan 16	Federal / Natural	Spruce 1	Federal
Lake Chelan 17	Federal	Spruce 2	Federal
Lake Chelan 18	Natural or Conservancy	Spruce 3	Federal
Lake Chelan 19	Federal	Spruce 4	Federal
Lake Chelan 20	Natural or Conservancy	Spruce 5	Federal
Lake Chelan 21	Federal	Spruce 6	Federal
Lake Chelan 22	Conservancy	Stehekin 01L	Federal
Lake Chelan 23	Federal	Stehekin 01R	Federal
Lake Chelan 24	Federal	Stehekin 02L	Federal
Lake Chelan 25	Federal	Stehekin 02R	Federal
Lake Chelan 26	Federal	Stehekin 03R	Federal
Lake Chelan 27	Conservancy or Natural	Stehekin 04	Federal
Lake Chelan 28	Federal	Stehekin 05	Federal
Lake Chelan 29	Federal	Stehekin 06	Federal
Lake Chelan 30	Federal	Stehekin 07	Federal
Lake Chelan 31	Federal	Stehekin 08	Federal
Lake Chelan 32	Federal	Stehekin 09	Federal
Lake Chelan 33	Conservancy	Stehekin 10	Federal
Lake Chelan 34	Federal	Stehekin 11	Federal
Lake Chelan 35	Federal	Stehekin 12	Federal
Lake Chelan 36	Federal	Surprise Lake 1	Federal
Lake Chelan 37	Federal	Swamp 1	Federal
Lake Chelan 38	Federal	Trapper 1	Federal
Lake Chelan 39	Conservancy or Natural	Trapper 2	Federal
Lake Chelan 40	Federal	Twentyfive Mile Creek L1	Rural
Lake Chelan 41	Natural	Twentyfive Mile Creek L2	Conservancy
Lake Chelan 42	Federal	Twentyfive Mile Creek L3	Conservancy
Lake Chelan 43	Conservancy or Rural	Twentyfive Mile Creek L4	Federal
Lake Chelan 44	Natural	Twentyfive Mile Creek L5	Natural
Lake Chelan 45	Natural	Twentyfive Mile Creek L6	Conservancy
Lake Chelan 46	Natural	Twentyfive Mile Creek R1	Rural
Lake Chelan 47	Conservancy	Twentyfive Mile Creek R2	Conservancy or Natural

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations	Reach Name	Environment Designation Recommendations
Lake Chelan 48	Conservancy	Twentyfive Mile Creek R3	Federal
Lake Chelan 49	Conservancy	Twentyfive Mile Creek R4	Conservancy or Natural
Lake Chelan 50	Conservancy	Twentyfive Mile Creek R5	Conservancy or Natural
Lake Chelan 51	Conservancy	Unnamed Lake 1	Federal
Lake Chelan 52	Rural or Urban	Unnamed Lake 2	Conservancy or Rural
Lake Chelan 53	Rural or Urban	Unnamed Lake 3	Federal
Lake Chelan 54	Rural or Urban	Wapato Lake 1	Conservancy
Lake Chelan 55	Conservancy	Wapato Lake 2	Conservancy or Rural
Lake Chelan 56	Rural	Wapato Lake 3	Conservancy
Lake Chelan 57	Conservancy	Wapato Lake 4	Conservancy
Lake Chelan 58	Rural	WF Agnes 1	Federal
Lake Chelan 59	Rural	WF Agnes 2	Federal
Lake Chelan 60	Rural	WF Flat 1	Federal
Lake Chelan 61	Rural	WF Flat 2	Federal
Lake Chelan 62	Rural	White Rock 1	Federal

3.3.2 City of Cashmere

Table 8. Preliminary Environment Designation Recommendations by Reach in the City of Cashmere and its Urban Growth Area.

Reach Name	Environment Designation Recommendations
Mission Creek	
CCA Mission Creek 1L (UGA)	Urban Conservancy
CCA Mission Creek 1R	Shoreline Residential
CCA Mission Creek 2L (UGA)	High Intensity
CCA Mission Creek 2R	High Intensity
CCA Mission Creek 3L (UGA)	Urban Conservancy / High Intensity (split segment)
CCA Mission Creek 3R	Urban Conservancy
CCA Mission Creek 4L	Shoreline Residential
CCA Mission Creek 4R	Shoreline Residential
CCA Mission Creek 5R	Urban Conservancy
CCA Mission Creek 6R	Shoreline Residential
CCA Mission Creek 7 (UGA)	Shoreline Residential
Wenatchee River	
CCA Wenatchee River 1L	Urban Conservancy
CCA Wenatchee River 1R (UGA)	Urban Conservancy
CCA Wenatchee River 2L	High Intensity
CCA Wenatchee River 2R (UGA)	Urban Conservancy
CCA Wenatchee River 3L	Urban Conservancy

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendations
CCA Wenatchee River 3R	Shoreline Residential
CCA Wenatchee River 4L	Shoreline Residential
CCA Wenatchee River 4R	Shoreline Residential
CCA Wenatchee River 5R	Urban Conservancy
CCA Wenatchee River 6R	Shoreline Residential
CCA Wenatchee River 7R	Shoreline Residential
CCA Wenatchee River 8R	Shoreline Residential
CCA Wenatchee River 9R (UGA)	High Intensity
CCA Wenatchee River 10R (UGA)	High Intensity
CCA Wenatchee River 11R (UGA)	Urban Conservancy
CCA Wenatchee River 12R (UGA)	High Intensity
CCA Wenatchee River 13R (UGA)	Shoreline Residential

3.3.3 City of Chelan

Table 9. Preliminary Environment Designation Recommendations by Reach in the City of Chelan and its Urban Growth Area.

Reach Name	Environment Designation Recommendation
Lake Chelan	
CCH Lake Chelan 1 (UGA)	Shoreline Residential – Single Family (SF)
CCH Lake Chelan 2	Shoreline Residential – Multi-Family (MF)
CCH Lake Chelan 3	Urban Conservancy
CCH Lake Chelan 4	Shoreline Residential - SF
CCH Lake Chelan 5 (UGA)	Shoreline Residential - SF
CCH Lake Chelan 6	Shoreline Residential - SF
CCH Lake Chelan 7 (UGA)	Urban Conservancy
CCH Lake Chelan 8	Urban Conservancy
CCH Lake Chelan 9	Shoreline Residential – SF
CCH Lake Chelan 10	Urban Conservancy
CCH Lake Chelan 11	Urban Conservancy
CCH Lake Chelan 12	Urban Conservancy
CCH Lake Chelan 13	High Intensity
CCH Lake Chelan 14	High Intensity
CCH Lake Chelan 15	High Intensity
CCH Lake Chelan 16	High Intensity
CCH Lake Chelan 17	Shoreline Residential – MF
CCH Lake Chelan 18	Urban Conservancy
CCH Lake Chelan 19	Urban Conservancy / Shoreline Residential – MF (split)
CCH Lake Chelan 20	Urban Conservancy
CCH Lake Chelan 21	Shoreline Residential – SF
CCH Lake Chelan 22	Urban Conservancy
CCH Lake Chelan 23	Shoreline Residential – MF
CCH Lake Chelan 24	Urban Conservancy / Shoreline Residential – MF (split)

DRAFT Chelan County Shoreline Management Recommendations

Reach Name	Environment Designation Recommendation
CCH Lake Chelan 25	High Intensity
CCH Lake Chelan 26	Urban Conservancy / Shoreline Residential – MF (split)
CCH Lake Chelan 27	Urban Conservancy / Shoreline Residential – MF (split)
CCH Lake Chelan 28	Shoreline Residential – MF
CCH Lake Chelan 29	High Intensity
CCH Lake Chelan 30	High Intensity
CCH Lake Chelan 31	High Intensity / Urban Conservancy (split)
CCH Lake Chelan 32	Urban Conservancy
CCH Lake Chelan 33	Shoreline Residential – SF
CCH Lake Chelan 34	Urban Conservancy
CCH Lake Chelan 35	Shoreline Residential – SF
CCH Lake Chelan 36 (UGA)	Shoreline Residential – SF
CCH Lake Chelan 37 (UGA)	Shoreline Residential – SF
Chelan River	
CCH Chelan River 1L (UGA)	Urban Conservancy
CCH Chelan River 1R	Urban Conservancy
CCH Chelan River 2L (UGA)	Urban Conservancy
CCH Chelan River 3L	Urban Conservancy / Shoreline Residential – MF (parallel)
CCH Chelan River 4L	Urban Conservancy

3.3.4 City of Entiat

Table 10. Preliminary Environment Designation Recommendations by Reach in the City of Entiat and its Urban Growth Area.

Reach Name	Environment Designation Recommendation
Entiat River	
CEN Entiat River 1	Natural / Urban Conservancy (parallel)
CEN Entiat River 2	Urban Conservancy
CEN Entiat River 3	Urban Conservancy
Columbia River	
CEN Columbia River 1	High Intensity
CEN Columbia River 2	Urban Conservancy
CEN Columbia River 3	Shoreline Residential
CEN Columbia River 4	High Intensity
CEN Columbia River 5	Waterfront Business
CEN Columbia River 6	Waterfront Business
CEN Columbia River 7	Shoreline Residential
CEN Columbia River 8	Shoreline Residential
CEN Columbia River 9	Shoreline Residential
CEN Columbia River 10 (UGA)	Urban Conservancy

3.3.5 City of Leavenworth

Table 11. Preliminary Environment Designation Recommendations by Reach in the City of Leavenworth and its Urban Growth Area.

Reach Name	Environment Designation Recommendation
Chumstick Creek	
CLV Chumstick Creek 1	Shoreline Residential
CLV Chumstick Creek 2 (UGA)	High Intensity
Wenatchee River	
CLV Wenatchee River 1L	Shoreline Residential
CLV Wenatchee River 1R (UGA)	Urban Conservancy
CLV Wenatchee River 2L	High Intensity
CLV Wenatchee River 2R (UGA)	Shoreline Residential
CLV Wenatchee River 3L	High Intensity
CLV Wenatchee River 3R	High Intensity
CLV Wenatchee River 4L	Urban Conservancy
CLV Wenatchee River 4R (UGA)	Shoreline Residential
CLV Wenatchee River 5L	Urban Conservancy
CLV Wenatchee River 5R	Urban Conservancy / High Intensity (parallel)
CLV Wenatchee River 6L	High Intensity / Urban Conservancy (parallel)
CLV Wenatchee River 7L	Shoreline Residential
CLV Wenatchee River 8L	Natural
CLV Wenatchee River 9L	Urban Conservancy
CLV Wenatchee River 10L	Urban Conservancy
CLV Wenatchee River 11L (UGA)	Natural
CLV Wenatchee River BI	Natural

3.3.6 City of Wenatchee

Table 12. Preliminary Environment Designation Recommendations by Reach in the City of Wenatchee and its Urban Growth Area.

Reach Name	Environment Designation Recommendation
Wenatchee River	
CWN Wenatchee River 1L (UGA)	Natural
CWN Wenatchee River 1R (UGA)	Natural
CWN Wenatchee River 2L (UGA)	Urban Conservancy
CWN Wenatchee River 2R (UGA)	Urban Conservancy / Shoreline Residential (parallel)
CWN Wenatchee River 3L (UGA)	Natural
CWN Wenatchee River 4L (UGA)	Natural
CWN Wenatchee River 5L (UGA)	Urban Conservancy
Columbia River	
CWN Columbia River 1 (UGA)	Natural / High Intensity (split)
CWN Columbia River 2 (UGA)	High Intensity
CWN Columbia River 3 (UGA)	Urban Conservancy

Reach Name	Environment Designation Recommendation
CWN Columbia River 4	Urban Conservancy
CWN Columbia River 5	High Intensity
CWN Columbia River 6	Waterfront
CWN Columbia River 7	Urban Conservancy / Waterfront (parallel and/or split)
CWN Columbia River 8 (City)	Urban Conservancy
CWN Columbia River 9 (UGA)	Urban Conservancy / High Intensity (parallel)
CWN Columbia River 9 (UGA)	Urban Conservancy / High Intensity (parallel)
CWN Columbia River 10 (UGA)	Urban Conservancy / High Intensity (parallel)
CWN Columbia River 11 (UGA)	Urban Conservancy / High Intensity (parallel)
CWN Columbia River 12 (UGA)	Urban Conservancy / High Intensity (parallel)
CWN Columbia River 13 (UGA)	Urban Conservancy / High Intensity (parallel)

4. ZONING/DEVELOPMENT STANDARDS ANALYSIS

The Shoreline Master Program currently addresses allowable land uses and development standards such as building height, setbacks, lot width, and others. These types of standards are also found in zoning codes. Critical area regulations establish buffers and influence setbacks as well. To avoid conflicts in standards or interpretation, this section presents an analysis of each local government’s SMP and zoning standards. Broad recommendations for consistency are also provided.

The Shoreline Management Act and the Shoreline Master Program Guidelines indicate the following regarding development standards:

4.1 Shoreline Management Act

90.58.320 Height limitation respecting permits. No permit shall be issued pursuant to this chapter for any new or expanded building or structure of more than thirty-five feet above average grade level on shorelines of the State that will obstruct the view of a substantial number of residences on areas adjoining such shorelines except where a master program does not prohibit the same and then only when overriding considerations of the public interest will be served.

4.2 Shoreline Master Program Guidelines

4.2.1 Regulatory Requirements

Environment-specific regulations shall address the following where necessary to account for different shoreline conditions: (WAC 173-26-211)

DRAFT Chelan County Shoreline Management Recommendations

- Types of shoreline uses permitted, conditionally permitted, and prohibited;
- Building or structure height and bulk limits, setbacks, maximum density or minimum frontage requirements, and site development standards; ...

Public Access (WAC 173-26-221): Adopt provisions, such as maximum height limits, setbacks, and view corridors, to minimize the impacts to existing views from public property or substantial numbers of residences. Where there is an irreconcilable conflict between water-dependent shoreline uses or physical public access and maintenance of views from adjacent properties, the water-dependent uses and physical public access shall have priority, unless there is a compelling reason to the contrary. ...

Flood Hazard Reduction(WAC 173-26-221): Flood hazard reduction measures may consist of nonstructural measures, such as setbacks, land use controls, wetland restoration, dike removal, use relocation, biotechnical measures, and storm water management programs, and of structural measures, such as dikes, levees, revetments, floodwalls, channel realignment, and elevation of structures consistent with the National Flood Insurance Program...

Shoreline Vegetation Conservation(WAC 173-26-221): ... Local governments may implement these objectives through a variety of measures, where consistent with Shoreline Management Act policy, including clearing and grading regulations, setback and buffer standards, critical area regulations, conditional use requirements for specific uses or areas, mitigation requirements, incentives and nonregulatory programs...

Shoreline Modifications - Shoreline Stabilization (WAC 173-26-231): ... Nonstructural methods include building setbacks, relocation of the structure to be protected, ground water management, planning and regulatory measures to avoid the need for structural stabilization...

Residential Development (WAC 173-26-241): ... Master programs shall include policies and regulations that assure no net loss of shoreline ecological functions will result from residential development. Such provisions should include specific regulations for setbacks and buffer areas, density, shoreline armoring, vegetation conservation requirements, and, where applicable, on-site sewage system standards for all residential development and uses and applicable to divisions of land in shoreline jurisdiction...

4.2.2 Discussion

As shown above, development standards such as height and setbacks will be important to several topics in the SMP influencing shoreline character, views,

DRAFT Chelan County Shoreline Management Recommendations

vegetation management, etc. Table 13 summarizes SMP and local government’s approaches to development standards.

Table 13. Shoreline Development Standards

Development Standard	SMP Provisions	County and Cities’ Zoning Codes	Recommendations for SMP Update
Residential Lots			
Minimum Lot Area – Increase due to Slope	Average lot slope equal to 11-15%: 25% increase in minimum lot area Average lot slope equal to 16%+: 50% increase in minimum lot area	Zoning requirements as well as and health district requirements in non-public wastewater areas determine minimum lot size	Remove lot area requirements in SMP and defer to zoning code.
Minimum Lot Area - Residential	Urban, Rural and Conservancy: None specified – per zoning Natural: 1 acre	Varies by zoning district	Remove lot area requirements in SMP and defer to zoning code. Consider an absolute minimum lot size as appropriate.
Lot Width	Urban and Rural: None specified – per zoning Conservancy: 100 ft at high water line Natural: 200 ft at OHWM	Varies by zoning district	Remove lot width requirements in SMP and defer to zoning code
Building Height			
Residential – Single Family	15 to 35 feet depending on Use Environment	30 – 35 ft	Continue less than or equal to 35 feet
Residential – Multifamily	15 to 35 feet depending on Use Environment	35 – 60 ft	Use maximum 35 feet unless jurisdiction has basis for overriding considerations of the public interest. This topic can be discussed at SMP public meetings as appropriate.
Commercial	25 to 35 feet depending on Use Environment	35 – 50 ft typical also to 90 ft	Same as above
Industrial	County: No limit Cities: If over 35 feet ensure no view obstruction	40 ft – 60 ft typical, also 90 ft or none specified	Same as above
Public/Recreation	Same as Residential	35 – 50 ft	Same as above
Building Setbacks		Rear yard identified below	
Residential – Single Family	County: Up to common line setback which is an average of existing waterfront lots or same as rear yard requirement under certain circumstances Natural Environment: 50 feet from OHWM	10 – 20 ft.	Setbacks may be based on one or more of the following factors: <ul style="list-style-type: none"> • shoreline character • critical area protection and/or vegetation management • future trail plans • view protection

DRAFT Chelan County Shoreline Management Recommendations

Development Standard	SMP Provisions	County and Cities' Zoning Codes	Recommendations for SMP Update
	All Cities: Equivalent to rear yard setback of zone; except where extensively sloped, setback is zero.		
Residential – Multifamily	Same	10 – 25 ft.	Same as above
Commercial	County: Same as residential common line setback All Cities: 25 feet except for certain water dependent uses	0 – 20 ft.	Same as above. Allow water oriented to go to 0 ft.
Industrial	County: 20 feet All Cities: None	0 - 10ft.	Same as above. Allow water oriented to go to 0 ft.
Public/Recreation	Same as residential	0 - 20 ft.	Same as above. Allow water oriented to go to 0 ft.

General recommendations can be summarized as follows:

- **Lot Standards:** Use local government lot standards in zoning codes rather than specifying a separate set of standards. This will allow for consistency among regulations and simplify interpretation and application of codes.
- **Building Height:** Generally apply a 35-foot height limit, measured from average grade per the SMA, except where a local government documents that greater heights would not obstruct views of a substantial number of residences and that there is an overriding public interest. The Shoreline Management Act specifies a maximum height of 35 feet above average grade to avoid view obstruction of a substantial number of residences unless a SMP establishes an alternative height and “then only when overriding considerations of the public interest will be served.”

Currently the SMP appears to allow ports/industrial uses to exceed 35 feet in height. Other uses are at 35 feet or less. However, many jurisdictions allow for greater heights in their multifamily and commercial zones, including in waterfront areas as part of mixed use concepts. Potential reasons to exceed the height may include requirements of the type of land use (e.g. high bays for industrial) or furtherance of waterfront transformation goals (e.g. Wenatchee and Entiat waterfront plans that will change the largely non-residential character of an area into a mixed use district). For heights above 35 feet,

each jurisdiction will need to determine their preferred alternative height limits and provide a basis for them.

- **Setbacks:** Allow for setbacks that work together to meet multiple objectives, including, but not limited to: shoreline character, critical area protection and/or vegetation management, future trail plans, view protection, promotion of water dependent uses.

Options and examples include:

1. Establish shoreline setbacks equivalent to critical area buffers. Example: Whatcom County SMP and City of Monroe SMP.
2. Establish a setback in addition to a critical area buffer. Example: Douglas County SMP.
3. Depending on use environment or specific shoreline use, provide for both setbacks and buffers: Cities of Sumner (buffer for more sensitive use environments and setbacks for less sensitive use environments) and Port Townsend (by shoreline use) SMPs.

A table with each community's development zoning standards is included in Appendix C for reference.

5. EXISTING SMP IMPLEMENTATION ANALYSIS

The following sections briefly summarize County and City perceptions of existing County and City SMPs implementation. As the implementing entities for the current and future SMPs, their input and recommendations will be useful tools in SMP development which not only meets the WAC Guidelines, but covers any special local topics and removes any ambiguities that have resulted in inconsistent or unpredictable shoreline permitting.

Several jurisdictions have noted that there are new uses since the 1975 SMP was created that automatically require a CUP because they are not included in the SMP. Boatlifts and buoys are two examples that should be specifically addressed in the updated SMPs so that a CUP is no longer required.

5.1 Chelan County

In recent years, County regulations have moved toward increased regulation of land uses. However, County officials have expressed interest in minimizing the use of variance and conditional use permits within shoreline jurisdiction.

DRAFT Chelan County Shoreline Management Recommendations

Instead, officials would prefer shoreline use decisions be made through administrative processes, when permitted by State regulations, avoiding associated cost and time delays for applicants and the need for hearing examiner involvement.

The County Department of Community Development developed a list of SMP issues to be addressed in this update, including the following:

- In-water structures: Boatlifts and buoys should be permitted in the same way as a dock. The regulations should address both attached and free-standing boatlifts, the number of boatlifts or buoys allowed per parcel, and what types of boatlift covers are permitted. Add a definition of “marina.” Establish dimensional dock standards to protect nearshore shallow-water areas; consider allowing larger docks for site-specific conditions. Establish setbacks for in-water structures. Define boat ramps, including the various types. Prohibit rails, tubes and vehicles.
- Water-oriented: Better definitions of water-dependent and water-related are needed.
- Non-conforming: Address consistently with State, County zoning code and Title 14 with respect to lots and uses⁵. Clarify what can be constructed on a legal non-conforming, unbuildable lot – primary and/or accessory uses.
- Specify dimensional standards for pathways, including heights. Exempt railings from the height standards.
- Include the complete list of shoreline exemption from WAC 173-27-040.
- Specify that the common line setback⁶ is to be measured from the foundation wall of the primary structure, not a deck. Protruding house structures may need to be addressed separately. No vegetation removal or decks should be permitted waterward of that setback, nor should any other development unless specifically authorized.
- Appurtenant structures: Define. Address permitting of retaining walls necessary for appurtenant structures.
- Address permitting of accessory uses when not associated with a primary use.
- Mitigation and restoration: Need specific requirement for mitigation and a no net loss standard. Upland and waterward mitigation need to be treated differently. Mitigation needs to be described and defined, and appropriate ratios developed.

⁵ WAC 173-27-080 “Nonconforming use and development standards” contains specific minimum requirements for treatment of non-conforming uses and development.

⁶ The common line setback is used in the existing SMP to establish setbacks of structures from the ordinary high water mark. The term may not have utility any longer as the County’s critical areas regulations establish shoreline buffers from the ordinary high water mark.

- Consider increasing the minimum height within the Urban environment.
- Specify that the assessed value should be of the structure being permitted, not the property or other structures on the property.
- Utilities: Specify whether trenching is allowed for installation of utilities. Provide standards for mitigation of any impacts from roads, wells, septic and stormwater systems, and shared driveways.
- Address internal conflicts within the SMP and between the SMP and the County Code Chapter 11.78 Critical Areas.
- Access and definitions need updating for consistency.
- Specify permitting process consistent with the SMA. Address expiration of permits and clarify when the “clock” starts.
- Remove references to current Chelan County Codes.

5.2 City of Cashmere

The City of Cashmere presently experiences a very low level of activity in the shoreline jurisdiction. According to the City, the County’s existing Shoreline Master Program is satisfactory.

5.3 City of Chelan

The City of Chelan’s Shoreline Master Program has not been amended since its adoption in 1975. The City would like to see ambiguities and missing uses addressed in the updated SMP so that it is clear and understandable to applicants and staff. More detail in the updated SMP will reduce the number of CUPs and variances.

The City has indicated that the City’s SMP standards regarding docks and marinas are too subjective. Subjective criteria for these uses should be eliminated, and replaced with dimensional standards. Additionally, because the new Federal Energy Regulatory Commission’s license allows for increased flow through the dam, Lake Chelan’s water level fluctuates drastically and was at a record low for a record length of time in 2008. It is recommended that newly implemented dock and marina standards are specific to the lake’s fluctuating lake depth due to these outflows at the dam. Buoys are another water-dependent alteration that should be carefully considered, with regulations developed that address environmental considerations as well as aesthetic concerns.

The City would like to see clear regulations provided for accessory developments, which are not covered by the existing SMP. Pools are one frequent example, and the SMP does not provide specific direction about whether they are allowed in shoreline jurisdiction or in a setback.

DRAFT Chelan County Shoreline Management Recommendations

City officials would like to encourage economic development of the lake, especially considering the City's small size. This can be facilitated in a revised SMP through appropriate use of environment designation assignments to allocate commercial water-oriented uses along the lake, consistent with the City's Comprehensive Plan and local conditions. Water-dependent uses should be specifically addressed and permitted where they are most likely to occur, with special consideration to Granite Ridge Marina and the City's Waterfront Commercial district. Setbacks and other site-development limiting standards could be set to balance environmental protection against accommodation of water-oriented uses that further the City's economic objectives. Additional economic development through tourism can be achieved through increased public access. The City would like to establish regulations requiring provision of public access for new developments other than single-family, similar to the City of Kirkland.

It is necessary to evaluate the cumulative impacts that land use actions create along the shoreline. For example, the City noted that the north end of Lake Chelan experiences a significantly higher water quality impacts from most land uses due to less movement and circulation in the water, whereas the south end of the lake has fewer water quality issues because of the greater turnover due to the movement through the dam. The new SMP should consider those differences when evaluating the most appropriate locations for new land uses located within shoreline jurisdiction.

In conjunction with land use updates, City officials would like to implement ecological protections, as neither the current SMP nor the Critical Areas Ordinance addresses the natural shoreline environment within City limits. An assessment of ecological functions should be completed as part of the SMP update to differentiate areas within the City, which are currently lumped in an Urban shoreline environment. Recognition of variable conditions and types of development that have occurred or are planned to occur will enable different areas of the City's shoreline to be treated specifically and individually in development of guidelines and recommendations for the SMP. For example, plans have been prepared for Lord Acres, Spader Bay, and Key Bay developments, and should be acknowledged in the SMP. The SMP should also pre-designate environments for the City's urban growth area.

With relation to the protection of shoreline functions as well as allowing for economic development, the City would like to consider implementing buffers in addition to shoreline setbacks in its new SMP. Any new buffer regulations should specifically address mitigation options rather than general goals of preservation. With the development of new buffer and setback reduction incentives, the City would like to see allowances for shoreline setback reductions through a variety of shoreline enhancement options. Under current regulations,

the ordinary high water mark is the rear yard setback in some areas of the City's shoreline. The most common problem occurs when the rear yard setback results in a 0-foot setback from the ordinary high water mark. New SMP regulations should address this issue to allow flexible shoreline development, while ensuring greater ecological protections.

5.4 City of Entiat

After review of the existing SMP, there are a number of items the City has indicated should be considered for implementation in the SMP update. The existing SMP does not address floats and boatlifts, nor is infrastructure along the shoreline defined. The SMP should include a list of accessory development activities that are permitted within the shoreline jurisdiction, such as swimming pools, sport courts, hot tubs, and decks, and regulations for these uses as needed. Also, detail should be provided regarding what types of vegetation shall be permitted along the shoreline (i.e. grass lawn, ornamental landscaping, etc.).

5.5 City of Leavenworth

The City of Leavenworth has indicated priorities for the SMP update include protecting the City's park system, while providing flexibility for development along the Wenatchee River shoreline, continuing to allow for public access to the river, and the consideration of view sheds along the shoreline corridor. The existing SMP lumps the entire City shoreline into the Urban environment. However, the City would like to consider a variety of designations, including allowance for active recreation areas and parks, increased tourism activities (i.e. concessionaires along the shoreline), and protection of the City's environmental treasures, including Blackbird Island and Enchantment Park.

5.6 City of Wenatchee

The City of Wenatchee has had very little permit activity along the Columbia and Wenatchee Rivers, with the exception of recent bridge repairs, the Riverside Drive project, and the City's public dock along the Columbia River. Because of the extent of PUD ownership along the City's shorelines, it has not identified any particular SMP update needs.

6. RESTORATION PLAN

WAC 173-26-201(2)(f) provides direction on the purpose and contents of the Restoration Plan as follows:

[M]aster programs shall include goals, policies and actions for restoration of impaired shoreline ecological functions. These master program

DRAFT Chelan County Shoreline Management Recommendations

provisions should be designed to achieve overall improvements in shoreline ecological functions over time, when compared to the status upon adoption of the master program...Master program restoration plans shall consider and address the following subjects:

- (i) Identify degraded areas, impaired ecological functions, and sites with potential for ecological restoration;
- (ii) Establish overall goals and priorities for restoration of degraded areas and impaired ecological functions;
- (iii) 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;
- (iv) Identify additional projects and programs needed to achieve local restoration goals, and implementation strategies including identifying prospective funding sources for those projects and programs;
- (v) Identify timelines and benchmarks for implementing restoration projects and programs and achieving local restoration goals;
- (vi) Provide for 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.

Table 14 outlines recommendations for development of the Restoration Plan consistent with these WAC requirements using the results of this Shoreline Inventory and Analysis, specifically Chapters 3 through 5 and their associated maps.

Table 14. Recommendations for Restoration Plan Strategy

Restoration Plan Requirement from the WAC	Recommendation to County	Recommendation to Cities
(i) Identify degraded areas, impaired ecological functions, and sites with potential for ecological restoration;	The Restoration Plan will reference Section 3.12, Potential Restoration Opportunities sections in Chapter 4, and results presented in Chapter 5 of the <i>Shoreline Inventory and Analysis</i> report.	
(ii) Establish overall goals and priorities for restoration of degraded areas and impaired	As outlined briefly in Section 3.12 and Potential Restoration Opportunities sections in Chapter 4 for the WRIAs, a great deal of work has been completed	The Cities are each active members of their respective Watershed Planning Units for WRIAs

DRAFT Chelan County Shoreline Management Recommendations

Restoration Plan Requirement from the WAC	Recommendation to County	Recommendation to Cities
ecological functions;	for WRIAs 40a, 45 and 46. The level to which each of the watershed planning efforts specifically targets and addresses restoration varies, but all provide either clear goals and priorities that should be carried over to the Restoration Plan, or provide a clear foundation for development of draft goals and priorities. WRIA 47 planning is underway, but there are several topical (geographically or by function) efforts that may provide some goal and policy elements. In all cases, the SMP Advisory Committee, Watershed Planning Unit members, and Chelan County DNR staff are anticipated to provide important supplementation.	45 (Cities of Cashmere, Leavenworth, and Wenatchee) and 46 (City of Entiat). Planning for the Chelan Watershed
(iii) 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;	<p>Chapters 2-4 identify the following projects/programs that are expected to contribute to improvement of one or more ecological functions:</p> <ul style="list-style-type: none"> • NPDES stormwater compliance by Wenatchee and the County, • Updates to critical areas regulations by several of the Cities in the next few years, • Continued development and implementation of various TMDLs, • Major upgrades to several wastewater treatment plants, • Implementation of habitat-focused Watershed Plan components, With County and Cities help, additional existing projects and programs will need to be further identified, including those being conducted/implemented by non-governmental organizations. 	
(iv) Identify additional projects and programs needed to achieve local restoration goals, and implementation strategies including identifying prospective funding sources for those projects and programs;	For some of the watersheds, the Watershed Plan contains discrete restoration goals, projects and programs. Additional projects or programs may not be necessary or practicable in those circumstances. This will be evaluated further during Restoration Plan development. For those watersheds without a completed Plan or for which the Watershed Plan did not include a discrete restoration component, it may be necessary to develop a list of additional projects and programs, using various other sources and the results of the Shoreline Analysis.	Participation in Watershed Plan (particularly for City of Chelan which does not yet have a completed Watershed Plan) implementation may not completely address local needs, desires, and opportunities for restoration. These will need to be explored in detail with each City during Restoration Plan preparation later in this SMP Update process. Public comments received during the first round of outreach during October 2008 may supplement this list.

DRAFT Chelan County Shoreline Management Recommendations

Restoration Plan Requirement from the WAC	Recommendation to County	Recommendation to Cities
<p>(v) Identify timelines and benchmarks for implementing restoration projects and programs and achieving local restoration goals;</p> <p>(vi) Provide for 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.</p>	<p>For those policy and project actions included in the Wenatchee Watershed Plan, timelines, benchmarks, and funding and monitoring strategies are provided in the Plan. The Entiat Watershed planning effort also includes a Detailed Implementation Plan. An implementation plan is not yet available for the Stemilt/Squilchuck Watershed. However, the plan does include preliminary discussion of potential funding sources and amounts. In addition, Chelan County DNR and/or the various Planning Units already have mechanisms in place for planning, implementing, and monitoring restoration projects. These general mechanisms will be documented and then applied to the Watershed Plan projects/programs as outlined in the Watershed Plans or similar available documents (e.g., Chelan Subbasin Plan), and applied to any others projects or programs identified in (iv) above.</p>	<p>To the extent that each City is participating in Watershed Plan implementation, timelines, benchmarks, and funding and monitoring strategies for projects/programs may be deferred to the County's identification of those parameters. Timelines and benchmarks for other projects and programs will need to be developed closely with each City, considering their budget availability, priorities, and anticipated grant opportunities.</p>