

# NO NET LOSS REPORT

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## FOR THE SKAGIT COUNTY SHORELINE MASTER PROGRAM

*Prepared for:*



Skagit County  
Planning and Development Services  
1800 Continental Place  
Mount Vernon, WA. 98273

*Prepared by:*



750 Sixth Street South  
Kirkland . WA 98033

p 425.822.5242  
f 425.827.8136  
watershedco.com



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

Grant No. G1100205

**February 2016**

The Watershed Company Reference Number: 090207.2

**Cite this document as:**

The Watershed Company. February 2016. No Net Loss Report for Skagit County's Shoreline  
Master Program. Prepared for Skagit County

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## **SKAGIT COUNTY SHORELINE MASTER PROGRAM**

### **1 INTRODUCTION**

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The Shoreline Master Program Guidelines (Guidelines), in WAC 173-26-186(8)(b) require local government shoreline master programs to regulate new development to “achieve no net loss of ecological function.” This No Net Loss Report provides a summary of how the development of the Skagit County Shoreline Master Program (SMP) and supporting documents, including the Shoreline Analysis Report, Shoreline Restoration Plan, and Cumulative Impacts Analysis, will ensure that ecological functions will not be degraded or minimized over time as the SMP is implemented. The Cumulative Impacts Analysis evaluated the effects of reasonably foreseeable development under the SMP and demonstrated that the goals, policies and regulations in the SMP, combined with recommendations in the Shoreline Restoration Plan, will prevent degradation of ecological functions relative to the existing conditions, as documented in the Shoreline Analysis Report. Note that the Shoreline Analysis Report and Restoration Plan were developed on a regional basis to include unincorporated Skagit County, as well as the towns of Lyman and Hamilton. The County has proceeded with preparing its own SMP and, correspondingly, individual Cumulative Impact Analyses and No Net Loss Reports will be prepared for each jurisdiction. This document only evaluates the County’s proposed SMP.

### **2 SHORELINE JURISDICTION**

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As defined by the Shoreline Management Act of 1971, shorelines include certain waters of the state plus their associated “shorelands.” At a minimum, the waterbodies designated as Shorelines of the State are streams whose mean annual flow is 20 cubic feet per second (cfs) or greater, lakes whose area is greater than 20 acres, and all marine waters. Shorelands are defined as: “those lands extending landward for 200 feet in all directions as measured on a horizontal plane from the ordinary high water mark; floodways and contiguous floodplain areas landward 200 feet from such floodways; and all wetlands and river deltas associated with the streams, lakes, and tidal waters which are subject to the provisions of this chapter...

Any county or city may determine that portion of a one-hundred-year floodplain to be included in its master program as long as such portion includes, as a minimum, the floodway and the adjacent land extending landward two hundred feet therefrom. Any city or county may also include in its master program land necessary for buffers for critical areas..." (RCW 90.58.030).

In Skagit County, 598 miles of streams/ivers, 53 lakes, and 228 miles of marine and estuarine shoreline meet shoreline jurisdiction criteria. The total area of upland shorelands is 56,710 acres, including floodways, and associated floodplains and wetlands. Federal lands make up 21 percent of that acreage, or 11,877 acres. Discussion of federal lands is limited in this report because the application of the future SMP will only apply to actions undertaken by non-federal parties on those lands.

All areas waterward of the extreme low tide throughout Puget Sound are considered Shorelines of Statewide Significance. Additionally, Skagit Bay and adjacent area from Brown Point to Yokeko Point along with Padilla Bay, from March Point to William Point, are identified as specific estuarine areas and are considered Shorelines of Statewide Significance waterward from the ordinary high water mark. All streams and rivers that have mean annual flow of 1,000 cfs or greater are considered Shorelines of Statewide Significance. This applies to the Skagit, Baker, Cascade, Sauk, and Suiattle Rivers. All lakes larger than 1,000 acres are also considered Shorelines of Statewide Significance. Only Shannon Lake meets this criterion.

The total area subject to the updated County SMP, not including aquatic area, is approximately 87.8 square miles. An additional 18,770 acres of potentially associated wetland may also be part of the County's shoreline jurisdiction.

### **3 SHORELINE ENVIRONMENT DESIGNATIONS**

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The assignment of shoreline designations is an important step in achieving no net loss of ecological function. The assignment of shoreline designations can help minimize impacts by concentrating development activity in lower functioning areas that are not likely to experience significant function degradation with incremental increases in new development or redevelopment.

The SMP Guidelines recommend a six-category shoreline environment designation scheme. The Skagit County Shoreline Master Plan includes an additional Rural Conservancy designation to address the Skagit Floodway specifically.

A brief description of each of the proposed upland shoreline designations follows in Subsections 3.1 through 3.7. The descriptions are generally organized according to the level of allowed development, beginning with the shoreline designations that allow less extensive or less intense development and ending with the shoreline designations that allow more extensive or more intense development.

### **3.1 Aquatic**

The purpose of the Aquatic environment designation is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark. Management policies focus on water-dependent uses, public access, and ecological restoration and aim to minimize impacts to the fish and wildlife habitat, views, water quality, natural hydrologic conditions, and surface navigation.

### **3.2 Natural**

The Natural environment designation is intended to protect those shoreline areas that are relatively free of human influence, include intact or minimally degraded shoreline functions, represent ecosystems and geologic types that are of particular scientific and educational significance, or that are unable to support new development with significant adverse impacts to ecological functions or risk to human safety. Only low-intensity uses are permitted in the Natural designation. Single-family residential, commercial forestry, low-intensity agriculture, research, and water-oriented recreational uses may be considered provided that ecological impacts can be avoided or minimized.

### **3.3 Rural Conservancy**

The purpose of the Rural Conservancy designation is to protect ecological function; conserve and protect existing natural resources, historic areas and cultural resources; provide for sustained resource use; achieve natural floodplain processes; and provide recreational opportunities. The designation is assigned to shoreline areas outside of cities and urban growth boundaries. Appropriate uses in the Rural Conservancy designation include low-impact recreation, forest production, agriculture and aquaculture, low-intensity residential, and low-intensity natural resources uses.

The designation protects an area's physical and biological resources, and supports non-permanent uses that do not degrade ecological functions or the rural character of the area.

Examples of uses that are appropriate in a Rural Conservancy designation include agriculture, commercial forestry, and aquaculture. Low-intensity, water-oriented commercial and industrial uses may be permitted where they have existed in the past or at sites that can support them without adverse ecological impact. Boating, fishing, hunting, and swimming uses are preferred, provided any impact is mitigated. Residential development and shoreline modifications should be designed to ensure that shoreline functions are protected.

### **3.4 Rural Conservancy - Skagit Floodway**

The purpose of the Rural Conservancy – Skagit Floodway designation is as that of the Rural Conservancy designation, as appropriate to those shoreline areas that are located within the floodway of the Skagit River from the State Route 9 bridge upstream to the confluence of the Skagit and Sauk Rivers. The Skagit Floodway is meant to be maintained relatively free of non-natural impediments. Appropriate uses in this designation include low-impact outdoor recreation uses, forest production, agricultural uses, aquaculture, and natural resource-based low-intensity uses, consistent with flood hazard regulations.

### **3.5 Shoreline Residential**

The Shoreline Residential designation is intended to accommodate higher density residential development and appurtenant structures and to provide public access and recreational uses where appropriate. The designation is assigned to shoreline areas inside urban growth boundaries, incorporated municipalities, limited areas of more intense rural development, and master planned resorts. Standards for development are designed to ensure no net loss of ecological function, and joint-use facilities are encouraged. New commercial developed should be limited to water-related uses, and adequate access, utilities, and services should be available.

### **3.6 Urban Conservancy**

The purpose of the Urban Conservancy designation is to protect and restore ecological functions of open space, floodplain, and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses. The designation is assigned to shoreline areas that are appropriate and planned for development compatible with maintaining or restoring the ecological functions, that are not generally suitable for water-dependent uses, and that lie in incorporated municipalities, urban growth areas. It may include commercial or industrial “limited areas of more intensive rural development” (LAMIRD) if the areas are suitable for water-related uses, are sensitive areas or open space, or perform ecological functions or have the potential to do so. Standards for new shoreline development or actions must ensure no net loss of ecological function is achieved. Public access and

recreation are permitted with appropriate, particularly for water-related uses. Mine and related uses may be permitted where ecological functions can be maintained.

### 3.7 High-Intensity

The High-Intensity designation is to provide for high-intensity water-oriented commercial, transportation, and industrial uses while protecting and restoring ecological function. It is assigned to shoreline areas within incorporated municipalities, urban growth areas, and industrial or commercial LAMIRD areas if they currently support high-intensity uses related to commerce, transportation, or navigation, or are suitable and planned for high-intensity water-oriented uses. Priority is given to water-dependent uses, and secondly to water-related and water-enjoyment uses. New non-water-related uses may be permitted as part of mixed-use development, provided they do not limit or conflict with water-oriented uses. Use of existing urban areas is encouraged over expansion, and new development should ensure no net loss of ecological function. Public access should be provided where feasible.

## 4 GOALS, POLICIES AND REGULATIONS

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The proposed SMP includes several goals intended to conserve the ecological function of all jurisdictional shoreline areas. Additionally, the proposed SMP recognizes that certain areas (see Chapter 2, above) are Shorelines of Statewide Significance and must be given additional consideration as major resources from which all people derive benefit (Proposed Comprehensive Plan Chapter 6, SMP Element, Section 6A). General goals for the Shorelines of Statewide Significance include:

- Preserve the natural character of the shoreline.
- Result in long-term over short-term benefit.
- Protect the resources and ecology of the shoreline.

The proposed Comprehensive Plan Chapter 6, SMP Element, includes overarching shoreline goals (Section 6A-2) for each of the individual elements outlined in the Shoreline Management Act (SMA) and SMP Guidelines. Select goals relevant to no net loss of ecological function include:

- **Shoreline use**—To allow for compatible uses of the shorelines in relation to the limitations of their physical and environmental characteristics. Such uses should enhance rather than detract from, or adversely impact, the existing shoreline environment.

- **Conservation**—To preserve, protect, and restore the natural resources of Skagit County’s shorelines in the public interest and for future generations. These natural resources include but are not necessarily limited to fish, wildlife, vegetation, and natural features found in shoreline regions. Only renewable resources should be extracted and in a manner that will not adversely affect the shoreline environment.
- **Restoration and enhancement**—To restore and enhance those shoreline areas and facilities that are presently unsuitable for public or private access and use.

The Shoreline Analysis Report evaluated existing conditions, with particular attention to ecological conditions in the County’s shorelines. The overarching purpose of recording baseline is to ensure the adopted regulations provide no net loss of shoreline ecological function. The report includes recommendations for translating findings into shoreline designations, SMP policies, and restoration strategies. Key recommendations from the Shoreline Analysis Report related to no-net-loss goals are presented in Tables 4.1 through 4.3, with brief descriptions of how those recommendations are addressed in the SMP.

Table 4-1. Implementation of key Shoreline Analysis Report general policy and regulation recommendations related to no net loss.

Analysis Report Recommendations	Proposed SMP Provisions
<b>Critical Areas</b>	
<p>Review the County’s CAO where needed to meet SMA requirements regarding no net loss; review the CAO to determine whether changes are needed to accommodate preferred uses consistent with no-net-loss requirements; customize the County’s existing stream buffers to ensure no-net-loss.</p>	<p>The SMP states that critical areas, where they exist in shoreline jurisdiction, must comply with the County’s CAO (SCC 14.24), subject to additional provisions found in SMP Part V. Shoreline buffers range from 100-200 feet, and are consistent with the buffers in the County’s CAO (14.26.310).The CAO includes mitigation sequencing provisions (14.24.080(5)(b)), which are referenced by the SMP. An applicant must submit a mitigation sequencing analysis if required by Part V, Critical Areas. Additionally, some uses and modifications (boating facilities, aquaculture, shoreline stabilization) specifically include a requirement for new uses to follow mitigation sequencing consistent with SMP Part V, Critical Areas.</p>
<b>Shoreline Vegetation and Conservation</b>	
<p>Build on protections in the County’s CAO and current SMP and promote shoreline vegetation retention and protect shoreline functions.</p>	<p>The County’s CAO is incorporated into the SMP by reference, with additional provisions/exclusions identified in SMP Part V. SMP policies 6H-3.1 through 6H- 3.4 call for maintenance of healthy vegetation, retention and planting of large conifers, protection of new and existing native vegetation, and prohibition of invasive plant introduction. SMP Section 14.26.380 describes in detail limits on vegetation</p>

Analysis Report Recommendations	Proposed SMP Provisions
	clearing and pruning, tree retention plan requirements, mitigation, and vegetation restoration requirements, which apply to all areas of shoreline jurisdiction.
<b>Water Quality, Stormwater, and Nonpoint Pollution</b>	
Ensure that regulations permit the placement within shoreline jurisdiction of structures and facilities intended to improve water quality.	Dredging for the restoration or enhancement of shoreline ecological function and processes benefitting water quality is permitted per 14.26.435(2)(c)(v).
Consider policies that address water quality and quantity improvement to protect and restore shoreline ecological and ecosystem processes.	Several SMP provisions, including environment designation polices and general and specific use and modification provisions, address water quality and quantity and support the protection of related ecological functions and processes.

Table 4-2. Implementation of key Shoreline Analysis Report shoreline modification recommendations related to no net loss.

Analysis Report Recommendations	Proposed SMP Provisions
<b>Shoreline Stabilization</b>	
Ensure consistency with WAC 173-26-231(3)(a) with regard to “replace” and “repair” definitions and standards; include a replacement threshold.	SMP shoreline stabilization policies (6A-18) require the design of replacement structures to minimize and mitigation impacts on shoreline ecological function. All shoreline stabilization measures must minimize and mitigate any adverse impacts to ecological functions. 14.26.480(4)(b)(iv).
Fully implement the principles and intent of the WAC guidelines, referencing appropriate exemptions from Shoreline Substantial Development (SSD) permits.	Shoreline permitted uses and modifications require a SSD permit or an exemption (SSD/E), consistent with the principles and intent of WAC, as laid out in Section 14.26.405. Two types of exemptions are referenced in the SMP: exemptions from the SMP, and exemptions from the SMA.
Give preference to lower-impact, “soft” shoreline modifications.	Soft shoreline stabilization methods are shown preference in the shoreline stabilization polices (6C-12.3) and in several provisions of Section 14.26.480. The feasibility of soft shoreline stabilization must be evaluated prior to a request for hard structural stabilization. 14.26.480(2)(b)
Include incentives for modification of existing armoring to improve habitat; prioritize key shoreline types that would maximize benefits.	The shoreline stabilization policy 6C-12.3 calls for incentives to encourage salmon-friendly design in new construction and redevelopment.
<b>Piers and Docks</b>	
Ensure consistency with WDFW and Corps design standards, recognizing special local circumstances.	WDFW and Corps standards were considered in regulation development and tailored for local conditions. Specific dimensional standards and decking requirements are provided in SMP Table

Analysis Report Recommendations	Proposed SMP Provisions
<b>Fill</b>	14.26.420-1.
Encourage restoration fills.	<p>Fill is permitted waterward of the OHWM for ecological restoration and enhancement, and when needed for cleanup and disposal of contaminated sediments (Section 14.26.440(4)b.iv).</p> <p>Policy (6C-6.3) allows fill for creation of new uplands only as part of an approved ecological restoration activity.</p>
Prohibit fill for creation of developable lands waterward of OHWM; permit fill waterward of OHWM only when compatible with requirements to protect shoreline ecological functions and ecosystem processes.	<p>Policy 6C-6.3 says fill should not be permitted for creation of new uplands unless it is part of an approved restoration activity. Regulations state that fill waterward of the OHWM is permitted only when necessary to support a few specific uses, which do not include creation of new developable lands (14.26.440(4)(b)(iv)). All fill must be the minimum necessary to accommodate approved uses and must be located, designed, and constructed to protect shoreline ecological functions and ecosystem-wide processes (14.26.440(4)(a)(i and iii)). Additionally, fill is prohibited in the Natural environment and requires a Conditional Use Permit (CUP) in the Aquatic environment designation (Table 14.26.405).</p>
<b>Breakwaters, Jetties, Groins and Weirs</b>	
Consider prohibiting new breakwaters, weirs, jetties, and groins except where needed for maintenance of existing water-dependent uses or restoration.	<p>Per Policy 6C-4.1, breakwaters, jetties, and groins should be permitted only when necessary to support specific water-dependent, public access, or stabilization uses. Breakwaters, jetties and groins are prohibited on all lake shorelines. Fixed breakwaters, jetties, and groins are only permitted in the High Intensity environment and are a conditional use in the Shoreline Residential environment on river and marine shorelines. Jetties and groins are permitted as part of shoreline enhancement or protection as a conditional use in all other upland designations (Table 14.26.405). Repair and replacement of jetties and groins are permitted provided it is determined that removing the structure would be more detrimental than letting it remain (14.26.425(2)(c)(2)). Breakwaters must be designed to protect critical areas and ecological functions (14.26.425(4)(a)), and impacts must be minimized.</p>
<b>Dredging and Dredge Material Disposal</b>	
Consider prohibiting dredging and dredge material disposal except for shoreline restoration, flood hazard reduction, and maintenance of	Dredging and dredge materials disposal must be done in a manner that avoids or minimizes ecological impacts, and mitigation must

Analysis Report Recommendations	Proposed SMP Provisions
existing legal moorage and navigation.	demonstrate no net loss of function (6C-5.3). Dredging is permitted only for limited maintenance activities, when there are no feasible alternatives or other alternatives may have a greater ecological impact, or for restoration or enhancement of shoreline ecological functions and processes benefitting water quality or fish and wildlife habitat or both (14.26.435(2)(c))
<b>Shoreline Habitat and Natural Systems Enhancement Projects</b>	
Include incentives to encourage restoration projects, especially in lower-functioning areas.	Policy 6K-1.6 calls for allowing tax incentive programs to encourage restoration and enhancement of shoreline ecological functions and to protect wildlife, plants, and habitat.

Table 4-3. Implementation of key Shoreline Analysis Report shoreline use recommendations related to no net loss.

Analysis Report Recommendation	Proposed SMP Provisions
<b>Agriculture</b>	
No changes recommended beyond regulations mandated by the SMP guidelines.	The SMP calls for the protection of ongoing agriculture (6C-1.1(a)). New agriculture and agricultural facilities are permitted with SSD/E in all shoreline designations (not applicable to Aquatic). The SMP includes provisions for new agricultural activities to protect shoreline ecological functions (14.26.410(2)(a)). Exempt and regulated activities must comply with the County Critical Areas Ordinance (SCC Section 14.24).
<b>Aquaculture</b>	
Differentiate between commercial and species restoration aquaculture and include provisions for temporary aquaculture activities.	Policies differentiate between species restoration and commercial aquaculture (6C-2.12). New and expanded aquaculture is subject to no-net-loss provisions (6C-2.7) and should protect water quality.
<b>Forest Practices</b>	
Provide forest practices policies and regulations that are consistent with WAC guidelines.	SMP provisions are consistent with the WAC (14.26.445). Policy 6C-7.2 states that the County should rely on the Forest Practices Act for managing commercial forests within shoreline jurisdiction. Forest practices likely to result in conversion to non-forest uses must comply with SMP Part V, Critical Areas (14.26.445(4)(b)).

Analysis Report Recommendation	Proposed SMP Provisions
<b>Recreational Development</b>	
<p>Protect and enhance existing parks; provide, through policies and regulations, clear preferences for shoreline restoration consistent with public access needs and uses.</p>	<p>Policy 6F-11 calls for prioritizing recreational development related to public access and use of the water. Policy 6F-15 calls for linking existing multiuse regional trails with local trails that increase access to parks and other public areas. Water-oriented recreational development is permitted through SSD/E in all designations except Natural, where it is a conditional use (14.26.405). Regulations state that recreational development must relate to access, enjoyment, and use of the shorelines of the state (14.26.465(2)(a)).</p>
<b>Residential Development</b>	
<p>Recognize existing and planned residential uses with adequate provision of services and utilities as appropriate to allow for shoreline recreation and ecological protection.</p>	<p>Residential development is permitted to some extent in all designations (except Aquatic), subject to protective provisions and SSD/E and CUP permitting. Residential development is subject to critical area setbacks and no-net-loss provisions (14.26.310(1) and 14.26.305(1)). Residential development must be located and designed to avoid the need for flood hazard reduction measures, including shoreline stabilization (14.26.470(4)(b)), must implement Low-Impact Development where feasible through compliance with MR5 in the Stormwater Management Manual (14.26.470(4)(e)) and must comply with SCC 14.26.380, Vegetation Conservation (14.26.470(4)(f)).</p>
<b>Transportation and Parking</b>	
<p>Allow for maintenance and improvement of existing roads and parking facilities, and for new roads and parking where necessary and where locating these facilities outside of shoreline jurisdiction is not feasible.</p>	<p>New roads and parking are allowed in all upland environment designations either as a SD/E or CU (14.25.405). However, all transportation facilities other than bikeways, trails, and equestrian trails are prohibited within shoreline jurisdiction unless locating outside of shoreline jurisdiction is infeasible (14.26.485(2)(a)). If location in shoreline jurisdiction is unavoidable new roads and parking are required to minimize possible adverse effects on unique or fragile shoreline features and achieve no net loss of ecological function (14.26.485(4)(a)(i) and (ii)).</p>
<b>Utilities</b>	
<p>Provide criteria for location and vegetation restoration as appropriate for new, expanded, and maintained facilities.</p>	<p>Policy 6C-13.1 directs utilities to be located in existing rights-of-way and avoid new corridors; joint use facilities are called for where feasible. Adverse impacts on natural resources are to be avoided with utility development. Location criteria specific to utility components are outlined in Policy 6C-13.2. After installation, the affected shoreline area should be regraded to the natural terrain, replanted with compatible, self-sustaining vegetation, and maintained until such vegetation</p>

Analysis Report Recommendation	Proposed SMP Provisions
	is established (policy 6C-13.3(a)(ii)). Surface water and stormwater outfalls must install vegetation consistent with 14.26.380, Vegetation Conservation (14.26.490(4)(f)(i)). Underground utilities are preferred and addressed in several parts of the SMP.
<b>Commercial Development</b>	
Recognize commercial uses and consider incentives to attract water-oriented uses in appropriate locations along the shoreline	The SMP gives preference to water-dependent, then water-related and water-enjoyment commercial uses over other commercial development (14.26.430(2)(a)).

## 5 RESTORATION OPPORTUNITIES

The Shoreline Restoration Plan (TWC 2014, amended 2016) prepared as part of the SMP update will serve as a valuable resource for the County and its restoration partners to improve impaired ecological functions in the County’s shorelines. The Restoration Plan identifies existing impacts of land uses on biological resources and processes, as well as existing biological resources, critical areas, and ecological functions in the County by watershed. A summary of studies and other work that identifies the highest priority opportunities for restoration and protection related to salmon recovery, restoration of modified shorelines, and restoration of forage fish habitat is included. Specific objectives of the plan were developed based on policies in the SMP and existing conditions.

The plan identifies existing and ongoing plans and programs within the County and that provide a means of developing restoration strategies and implementing restoration projects and actions. Existing and planned site-specific projects are described, with timetables and funding sources where known, and broad-scale restoration needs are addressed as well. Potential restoration projects and activities are listed for each of 11 management areas, with proposed timeframes, sponsors, and potential funding sources.

An implementation strategy is outlined that proposes a general process for evaluation and prioritization of projects, based on criteria drawn from the Skagit Watershed Council’s 2010 Strategic Approach (Beechie and Raines 2010). An approach to monitoring and tracking projects is outlined, and suggestions for tracking new development and land use activities using the County’s permit system are given.

## 6 CUMULATIVE IMPACTS

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The Cumulative Impacts Analysis determined that the SMP will maintain existing shoreline functions within Skagit County while accommodating the reasonably foreseeable future shoreline development. Additionally, other local, state, and federal regulations will further assure the maintenance of shoreline ecological functions over time. The SMP's Shoreline Restoration Plan will ensure that incremental losses that could occur despite SMP provisions do not result in a net loss of functions, and these restoration actions may result in a gradual improvement in shoreline functions.

The following are some of the key features identified in the Cumulative Impacts Analysis that protect and enhance shoreline ecological functions to ensure that the no-net-loss standard is met.

- Shoreline designations were informed by the results of the Shoreline Analysis Report, and shorelines uses and modifications individually determined to be permitted or prohibited in each designation. The most uses and modifications are allowed in areas with the highest level of existing disturbance. Undisturbed shorelines are designated as Natural and receive a high level of regulatory protection.
- Impact avoidance and minimization, criteria for locating structures and utilities, mitigation requirements, vegetation conservation standards, and critical areas regulations in the SMP are designed to achieve no net loss.
- Shoreline modification regulations emphasize minimization of structure size, location, and use of eco-friendly designs.
- Regulations prohibit shoreline uses that are incompatible with existing land uses and ecological conditions and emphasize appropriate location and design.
- Critical area buffers are based on best available science to protect water quality and physical and biological processes on all shorelines.

Emphasis is placed on achieving no net loss of ecological function throughout the SMP; type of use, development location and design, vegetation removal, maintenance of existing structures and facilities, and other actions are subject to designation-specific standards addressing the preservation of water quality, water quantity, and habitat function in the shoreline, as well as basin-wide ecological processes.

## 7 CONCLUSIONS REGARDING NO NET LOSS

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The Shoreline Analysis Report enabled the SMP update process to rely on current, comprehensive information on the shoreline environment. The Cumulative Impacts Analysis evaluated the effects of reasonably foreseeable future development that may occur under the SMP. The Shoreline Restoration Plan identified planned actions and other opportunities to improve impaired ecological functions in the County's shorelines. The identification of existing conditions, anticipated future impacts, and restoration opportunities in Skagit County facilitated the development of regulations that directly and fully consider the preservation of ecological function, and subsequently no net loss.

Major elements of the SMP that ensure no net loss of ecological function fall into four general categories: 1) shoreline designations, 2) general provisions, 3) shoreline use and modification provisions, and 4) the Shoreline Restoration Plan. Shoreline designations recognize the shoreline areas most desirable for greatest protections and those areas that may withstand some degree of development without substantial or unmitigated ecological loss; the SMP applies standards appropriate to each designation, permitting and prohibiting uses as necessary to achieve no net loss. Provisions for all shoreline uses and modifications (including structure and facility maintenance and repair, new development, and public access and views) were subject to an analysis of potential ecological impacts and developed with the goal of achieving no net loss of function and improving shoreline function where the opportunity exists. Finally, the Shoreline Restoration Plan will inform and guide restoration efforts to ensure that projects with maximum potential for ecological lift are prioritized, and that restoration addresses impaired shoreline functions and processes.

Given the above provisions, implementation of the proposed SMP is anticipated to achieve **no net loss of ecological functions in Skagit County's shorelines.**

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