

MEMORANDUM



Date: May 11, 2015
To: Lacey Hatch, City of Bellevue
From: Sarah Sandstrom and Dan Nickel, The Watershed Company
Project Number: 070613
Project Name: Bellevue SMP

Subject: Summary of Cumulative Impacts Analysis for the Proposed City of Bellevue Shoreline Master Program

The purpose of this memorandum is to summarize the conclusions of the draft cumulative impacts analysis (CIA) currently being completed for the proposed City of Bellevue Shoreline Master Program (SMP).

The analysis of the cumulative impacts of potential development under the proposed SMP integrates the understanding of existing conditions, likely future land use changes, the potential effects of shoreline activities on ecological functions, the proposed SMP standards to manage and regulate shoreline uses and modifications, as well the net effect of other regulations and programs that affect shoreline functions.

Analysis of the City's shorelines and potential future development indicates that there are limited opportunities for new development within shoreline jurisdiction. Therefore, major changes in development patterns or type of use are unlikely. Much of the foreseeable development activity will be redevelopment of existing structures. The SMP provisions allow the flexibility to continue existing uses, but require avoidance, minimization, and mitigation measures to maintain existing shoreline ecological functions.

The following features of the proposed SMP are particularly significant in helping to maintain shoreline ecological functions.

Allowed Uses

- Areas with distinct uses and features are differentiated by environment designation to accommodate appropriate uses and protect intact ecological functions.
- Uses that are incompatible with the existing land use and ecological conditions are prohibited, and the SMP generally emphasizes appropriate location and design of new development.

Water Quality

- Water quality, stormwater, and non-point pollution standards require compliance with stormwater standards and prohibit specific materials that degrade water quality for in-water structures.
- Standards related to transportation, dredging, clearing, grading, and fill help to minimize effects of development on water quality.

Shoreline Modifications

- Standards for new residential development minimize the likelihood of future shoreline stabilization associated with new development.
- Strict standards for new and enlarged stabilization measures limit the likelihood and potential impact of such structures. Emphasis is placed on use of soft stabilization in place of hard stabilization.
- Standards for replacement of shoreline stabilization will limit future vertical bulkheads.
- Dimensional and materials standards for new and reconfigured docks help limit their impact on aquatic habitat.
- Provisions applicable to the repair and replacement of docks in non-residential areas help offset incremental losses that may be associated with expansion of existing facilities.

Vegetation Conservation

- Vegetation conservation standards in Urban Conservancy and Urban Conservancy- Open Space designations require planting the full vegetation conservation area (0-50 feet from OHWM), except for locations with water-dependent uses, with native vegetation as part of any development proposal.
- Vegetation conservation standards applicable to shoreline residential uses account for existing conditions and require proportional mitigation for impacts.
- Shoreline critical area standards apply to shoreline associated-wetlands, geologically hazardous areas, and floodplains.

Protections in the SMP will be enhanced and strengthened as a result of the other local, state and federal regulations and programs that apply to shoreline use and development, as well as in areas outside of shoreline jurisdiction.

- Current application of state and federal standards for overwater, in-water, and shoreline stabilization structures would require demonstration that the proposed project is the least environmentally damaging alternative.
- Floodplain standards require completion of a habitat assessment for any development in the floodplain to demonstrate that flood storage, floodplain vegetation, and floodplain habitat functions are maintained.

- Critical areas regulations apply city-wide. These standards establish mitigation sequencing, buffer standards, and specific development restrictions for areas in and adjacent to critical areas.
- City zoning, comprehensive plan designations, stormwater regulations, clearing and grading standards apply throughout the city to ensure appropriate uses and help maintain water quality, vegetation, and habitat functions.
- City-sponsored outreach and education programs are implemented in association with the City's National Pollutant Discharge Elimination System (NPDES) permit.

The City will also seek to implement the Shoreline Restoration Plan, which identifies opportunities to improve or restore ecological functions that have been impaired as a result of past development activities. The Shoreline Restoration Plan establishes clear priorities and identifies resources to enable coordinated restoration of the City's shoreline processes and functions. The Shoreline Restoration Plan further identifies and defines specific projects, predominantly on public lands, and programs that are likely to be implemented in the foreseeable future.

In summary, based on the analysis of existing conditions, anticipated development, likely effects of the SMP, and the implementation of other regulations and programs in the City, the proposed SMP is expected to meet the standard of "no net loss" of shoreline ecological functions.