

Tumwater Shoreline Master Program Update

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Project Purpose: To adopt a new Shoreline Master Program (Program) that is consistent with new State Shoreline Guidelines (Guidelines) adopted in 2003, as required by the Shoreline Management Act (SMA) - RCW 90.58

Process: Using a \$300,000 grant from the Washington State Department of Ecology (Ecology), Thurston Regional Planning Council (TRPC) worked with the cities of Tumwater, Lacey and Olympia in a multi-jurisdictional planning effort from June 2007 to June 2009 to develop an updated Program template. Each jurisdiction is now responsible for tailoring the template to its community and adopting an updated Program.

TRPC also prepared several other related documents required by the Guidelines. A Shoreline Inventory and a Shoreline Analysis and Characterization Report provide the foundation for Program policies, regulations and the shoreline environment designations. A Restoration Plan and Cumulative Impact Analysis were also prepared. These last two documents will need some additional modifications prior to Tumwater submitting a complete Program packet to Ecology for approval.

State law requires the Program to be adopted in 2011. The Planning Commission will continue their review over the summer and will hold a public open house in addition to a public hearing. Council review will occur in the fall and winter. The final Program will then be submitted to Ecology for approval.

Background Information

Shoreline Policy

The SMA addresses three policy areas: shoreline use, environmental protection and public access. The SMA emphasizes accommodation of appropriate uses that require a shoreline location, protect shoreline environmental resources, and preserve and enhance the public's right to access and use the shorelines (RCW 90.58.020).

Shoreline use: The SMA establishes the concept of *preferred uses* of shoreline areas. The SMA requires that "uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon use of the states' shorelines..." "Preferred" uses include single family residences, ports, shoreline recreational uses, water dependent industrial and commercial developments and other developments that provide public access opportunities. To the maximum extent possible, the shorelines should be reserved for "water-oriented" uses, including "water-dependent," "water-related" and "water-enjoyment" uses.

Environmental protection: The SMA is intended to protect shoreline natural resources, including "...the land and its vegetation and wildlife, and the water of the state and their aquatic life..." against adverse effects. All allowed uses including preferred uses are required to mitigate adverse environmental impacts to the maximum extent feasible and to preserve the natural character and aesthetics of the shoreline.

Public access: Master programs must include a public access element making provisions for public access to publicly owned shorelines, and a recreational element for the preservation and enlargement of recreational opportunities.

No Net Loss of Ecological Function and Restoration

The requirement for 'no net loss' was enacted in 2003 with the adoption of the Guidelines. The Guidelines require Programs to include policies and regulations designed to achieve no net loss of shoreline ecological functions, and to achieve overall improvements to ecological functions over time. General principles of these policies and regulations identified below.

- Select shoreline environment designations that fit shoreline conditions;
- Establish shoreline setbacks and vegetation buffers to reduce the impacts of development on the shoreline environment;
- Remove lawns and restore native vegetation over time as redevelopment occurs;
- Establish lower residential densities in the Urban Conservancy and Natural shoreline environments to reduce impacts to shoreline resources;
- Require mitigation sequencing for all development;
- Establish mitigation measures and restoration requirements;
- Continue to find funding for restoration projects; and
- Project proponents will be required to demonstrate that the proposed development results in no net loss.

In addition to establishing policies, regulations and standards for mitigation and no net loss regarding shoreline development, the City must also demonstrate that the updated Program will not result in a loss of ecological functions. This is done through a variety of steps, most of which have already been completed by TRPC and where noted, are being updated or prepared by the City:

- Conduct a shoreline inventory and characterization to document baseline conditions;
- Conduct a shoreline use analysis to estimate future demand for shoreline space;
- Develop shoreline management recommendations (City updating);
- Develop a restoration plan (City updating);
- Prepare a cumulative impact analysis (City updating); and

- Prepare a no net loss summary (City).

Chapter 4 of the Program Handbook published by Ecology, *No Net Loss of Shoreline Ecological Functions*, provides a comprehensive overview of this issue. The handbook may be access via the link below:

<http://www.ecy.wa.gov/programs/sea/shorelines/Program/handbook/Chapter4.pdf>

No Net Loss of Ecological Function and Restoration Lacey, Olympia, and Tumwater

The concept of no net loss of shoreline ecological functions is rooted in the Shoreline Management Act and in the goals, policies, and governing principles of the state's shoreline guidelines.

The Act states:

“Permitted uses in the shoreline shall be designed and conducted in a manner that minimizes insofar as practical, any resultant damage to the ecology and environment of the shoreline area.”

It is not enough to simply prevent further loss of ecological functions, master programs provisions must also

“...achieve overall improvements in shoreline ecological functions over time when compared to the status upon adoption of the master program.”

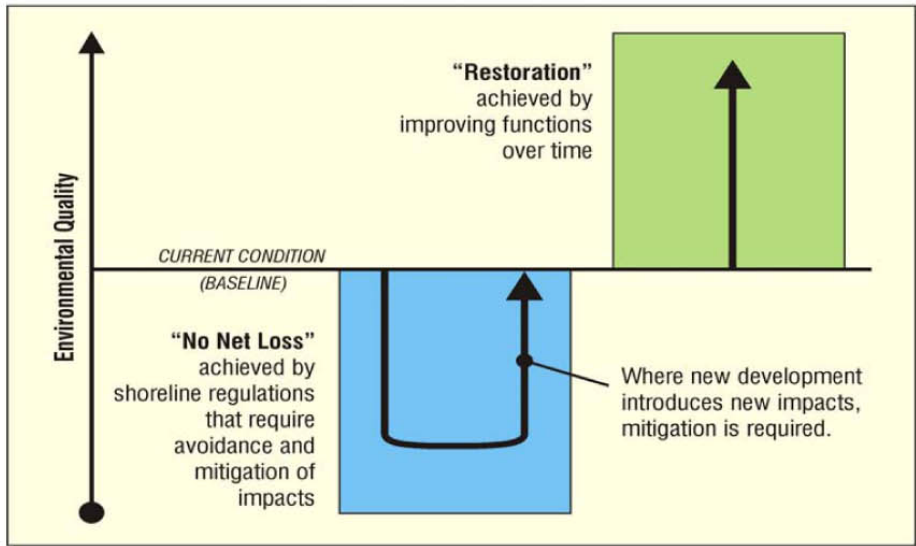
Protecting Ecological Function

According to the governing principles of the guidelines, protection of shoreline ecological functions are accomplished through the following:

- Meaningful understanding of current shoreline ecological conditions
- Regulations and mitigation standards that ensure that permitted developments do not cause net loss of ecological functions
- Regulations that ensure exempt developments do not result in net loss of ecological functions
- Goals and policies for restoring ecologically impaired shorelines
- Regulations and programs that fairly allocate the burden of mitigating cumulative impacts among development opportunities
- Incentives and voluntary measures designed to restore and protect ecological functions

The mandate to improve functions over time provides the basis for restoration planning and creates a distinction between mitigation and restoration in the context of the Act.

Two Distinct Objectives: No-Net Loss of Shoreline Ecological Functions and Restoration Over Time



Shoreline jurisdiction crosses city boundaries in the Lacey-Olympia-Tumwater urban area making coordinated planning essential. Urban growth area is shown in dashed line; city limits in shading.

Shoreline Master Program Update – Lacey, Olympia, and Tumwater – Spring 2009
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SMA Shoreline Goals

The SMA balances a number of competing goals to ensure the productivity and sustainability of the shorelines in Washington State. Some of the important goals from the SMA include: economic use of the shorelines, public access and recreation, restoration of ecological functions and processes, and preferred accommodation of single-family residences. Under the State's Guidelines, Tumwater's Program update must achieve the following:

- Identify and inventory current and potential ecological processes and functions;
- Develop policies and regulations for shoreline uses and modifications with the intent of no net loss of ecological processes and functions;
- Include goals and policies for restoration of impaired ecological functions and processes;
- Evaluate the cumulative impacts of reasonably foreseeable development, including development exempt from permits;
- Require public access in developments for water-enjoyment, water-related and non-water-dependent uses and for the subdivision of land into more than four parcels;
- Address vegetation conservation and restoration, and include regulatory provisions that address conservation of vegetation as necessary to assure no net loss of shoreline ecological functions;
- Integrate critical areas regulations into the Program. Once the Program is approved by Ecology, it becomes the regulations for the protection of critical areas within shoreline areas.

Draft Shoreline Master Program Highlights

Shoreline Permits – Chapter 2

The SMA establishes a local/state partnership in administering permits. The City has the primary responsibility for initiating the planning required by the Act and administering the Program. The role of the Ecology is to act primarily in a supportive and review capacity with an emphasis on providing assistance to local government and on insuring compliance with the policies and provisions of the SMA.

Most developments within shorelines of the state must be consistent with the policies of the SMA and the requirements of the Tumwater Program. Most developments that meet a specific dollar threshold are considered "substantial developments" and require a substantial development permit (SDP).

Under certain circumstances, local governments can allow deviations from Program requirements through shoreline variances. Conditional use permits are required for

certain uses that warrant additional review and are subject to additional development standards and review/approval processes.

Certain kinds of development are exempt from substantial development, conditional use, and/or variance permit requirements. Most activities exempt from the requirement to obtain a SDP must comply with the policies of the SMA and substantive requirements of the Program. A proposed development may be found exempt from requirements for an SDP but may still require a variance or conditional use permit.

Permit process

All shoreline permits are processed by the City. Following the City decision on all permit applications, applications are sent to Ecology. Ecology must approve, approve with conditions or deny shoreline conditional use permits and variances. Ecology does not have direct approval authority over the more common SDPs. If SDPs are found inconsistent with the Program and the SMA, Ecology may file an appeal with the Shorelines Hearings Board.

Shoreline Jurisdiction – Chapter 3

At a minimum, the SMA applies to all Shorelines of the State. Shorelines of the State, as defined under the SMA include:

- All marine waters, as well as tidelands
- Lakes 20 acres or greater in size
- Streams and rivers with a mean annual flow of greater than 20 cubic feet per second
- The following areas when they are associated with one of the above:
 - Wetlands and river deltas
 - Floodways
- Upland areas extending 200 feet from shoreline's edge, and portions of the 100-year floodplain within 200 feet of an associated floodway

Change to Regulated Shorelines

- Barnes Lake will now be regulated under the Program as it is 34 acres in size. This lake was in the original 1974 shoreline inventory but was not included in the 1990 Program. The size of the lake was field verified in 2008.

Shoreline Environment Designations (SEDs) – Chapter 3

Shoreline master programs are required to establish a system for classifying shoreline areas into specific environment designations. The classification system is to be based on a number of factors such as existing uses, the biological and physical characteristics of the shoreline, Comprehensive Plan goals, and criteria set forth in the Guidelines. The purpose of the shoreline environment designations is to

encourage uses that protect or enhance the current or desired character of the shoreline.

Shoreline designations are like zoning designations – permitted, conditional, and prohibited uses are identified within each designation. Development standards, such as height, setbacks, and impervious coverage, are also established for each shoreline designation. When establishing designations, cities should ensure that existing shoreline ecological functions are protected with the proposed pattern and intensity of development. Shoreline environment designations should also reflect the City’s goals and policies for restoration of degraded shorelines.

The Guidelines recommend the use of six environment designations – *High Intensity*, *Shoreline Residential*, *Urban Conservancy*, *Rural Conservancy*, *Natural*, and *Aquatic*. The City of Tumwater will utilize all but the *Rural Conservancy* designation. The Planning Commission has chosen to use the term “Urban Intensity” instead of “High Intensity.” The purpose and intent of this designation will remain the same. A description of the purpose of each designation is summarized below.

Urban Intensity (formerly High Intensity) – Provide for high-intensity water-oriented commercial, transportation and industrial uses while protecting existing ecological functions in areas that have been previously degraded.

Shoreline Residential – Accommodate residential development and appurtenant structures that are consistent with the Guidelines; provide appropriate public access and recreational uses.

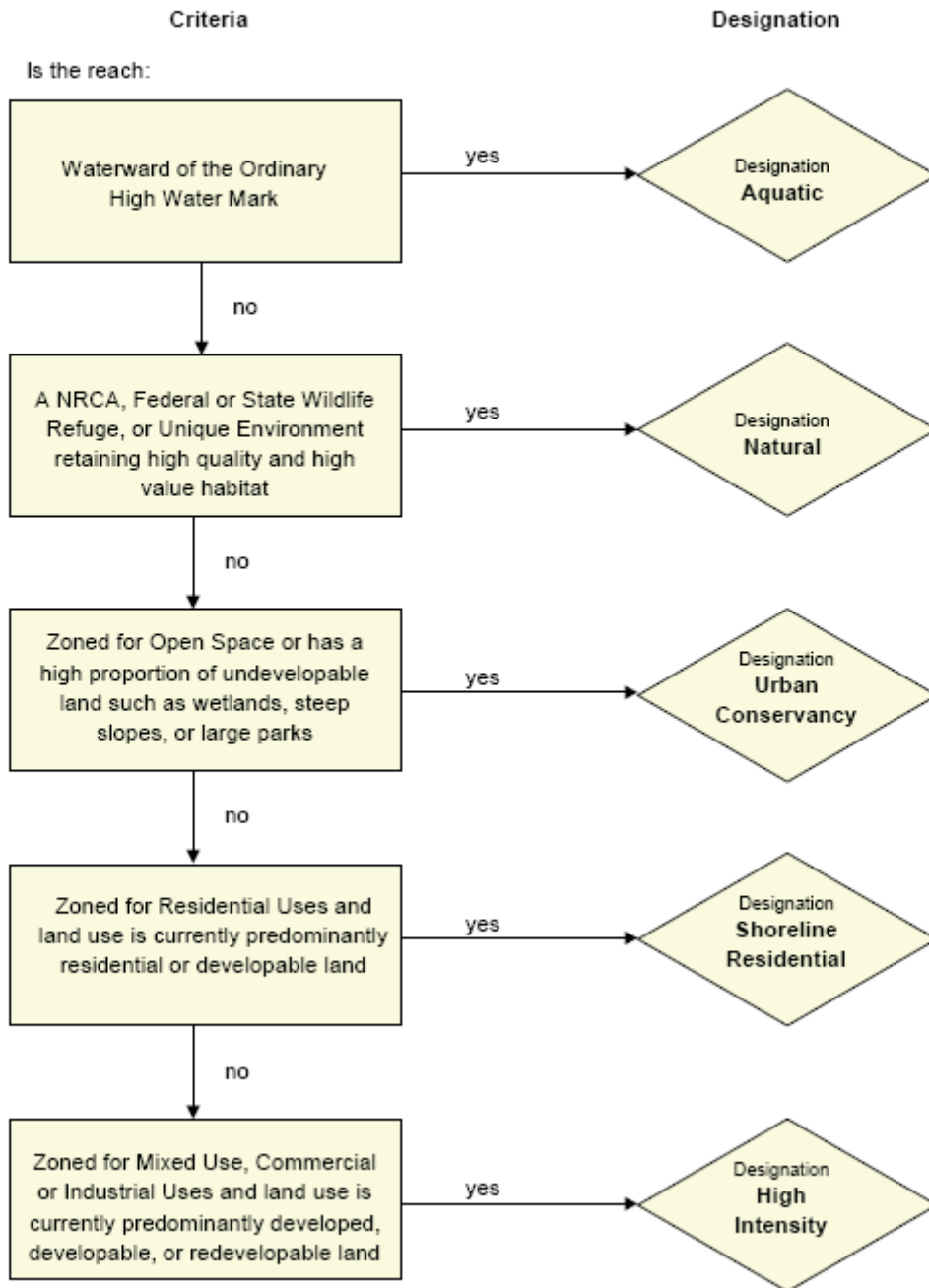
Urban Conservancy – Protect and restore ecological functions of open space, floodplain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses.

Natural – Protect shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline functions intolerant of human use. Only low intensity uses are allowed in this *Natural* environment in order to maintain ecological functions and system-wide processes. Degraded areas should be restored.

Aquatic – Protect, restore, and manage the unique characteristics and resources of areas waterward of the ordinary high water mark.

Designation Criteria

The flow chart below shows the criteria used to determine the shoreline environment designations.



Source: TRPC Handout – Shoreline Jurisdiction

Proposed shoreline environment designations are shown on the Shoreline Environment Designations Map included as Appendix A of the draft Program. The rationale for the environment designations is contained in a report written by

TRPC, titled *Shoreline Environmental Designations for the Cities of Lacey, Olympia, and Tumwater and their Urban Growth Areas*.

Shoreline Master Program Goals – Chapter 4

Goals of the Program apply to all uses and development within shoreline jurisdiction. The goals are not listed in order of priority. It is the intent of the SMA to prepare Programs which balance a number of competing goals to ensure productivity and sustainability of shorelines. The goals of the Program include:

- Conservation
- Economic Development
- Historic, Archeological, Cultural, Scientific and Educational Resources
- Public Access
- Recreation
- Restoration and Enhancement
- Shoreline Use
- Transportation and Utilities

These goals are guided by WAC 173-26 and the governing principles in Section 1.3 of the Program. The goals are implemented by the policies and regulations found in Chapters 5, 6 and 7.

General Policies and Regulations – Chapter 5

General policies and regulations apply to all shorelines of the state regardless of the shoreline environment designation (e.g. high intensity, shoreline residential, etc.). An overview of environmental protection, critical areas/shoreline vegetation and public access policies and regulations is provided below. Other sections of this chapter address water quality, flood hazard reduction, parking, signage, historical/archeological resources and scientific/educational uses.

Environmental Protection

The SMA is intended to protect shoreline natural resources, including "...the land and its vegetation and wildlife, and the water of the state and their aquatic life..." against adverse effects. All allowed uses including preferred uses are required to mitigate adverse environmental impacts to the maximum extent feasible and preserve the natural character and aesthetics of the shoreline.

To assure no net loss of shoreline ecological functions, master programs must include provisions that require proposed developments to analyze environmental impacts of a proposed development and to include measures to be applied in the following sequence of steps, listed in order of priority:

1. Avoid the impact altogether by not taking a certain action or parts of an action;
2. Minimizing impacts by limiting the degree of magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;

3. Rectifying the impacts by repairing, rehabilitating, or restoring the affected environment;
4. Reducing or eliminating the impact over time by preservation and maintenance operations;
5. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and
6. Monitoring the impact and the compensation projects and taking appropriate corrective measures.

When applying mitigation sequencing to development proposals, the higher priority measures must be considered first before resorting to the lower priority measures. Additionally, the level of mitigation must be appropriate to the impacts of the proposed development; this is typically evaluated in a critical areas report, habitat assessment, or mitigation plan that is submitted with a development application. On-site mitigation or in the immediate vicinity is preferred, but off-site locations may be considered if: 1) they are located within the same watershed as the project site, and 2) they address a specific conservation need identified as part of a watershed or comprehensive management plan. Regardless of how mitigation is accomplished, it cannot result in a net loss of shoreline ecological functions or system-wide processes.

The Program includes policies and regulations for addressing mitigation required by the Guidelines. General principles for these policies and regulations are as follows:

- Project proponents will be required to demonstrate that all reasonable measures have been taken to avoid adverse impacts of a development proposal. Mitigation sequencing is to be applied on all development proposals;
- Mitigation plans will be required where impacts cannot be avoided;
- On-site mitigation is preferred, but off-site mitigation will be considered if consistent with the Guidelines; and
- Utilize standards in the critical areas regulations as the basis for mitigation in all shoreline areas.

Critical Areas and Shoreline Vegetation

The Program incorporates the following critical areas regulations: Geologically Hazardous Areas, Wetland Protection Standards, Fish and Wildlife Habitat Protection and the Floodplain Overlay. Once the Program is formally adopted, all these regulations will be administered through the Program for critical areas located within shoreline jurisdiction.

Critical area buffers apply to all shorelines regulated by the Program and are established on a case-by-case basis. The City's existing wetland and riparian habitat regulations establish buffer widths based on the wetland category, stream

type, and other considerations such as wetland or riparian habitat function and proposed use. Lakes are subject to riparian habitat buffer requirements that do not set a minimum standard, so the Program has set forth the following minimum buffer widths by shoreline environment designation. These minimum buffer widths may be increased based on a habitat protection plan as required by the City's Fish and Wildlife Habitat Protection Standards set forth in Chapter 16.32 TMC.

Urban Intensity	50 Feet
Shoreline Residential	50 Feet
Urban Conservancy	75 Feet
Natural	100 Feet

Critical area buffers are considered vegetation conservation areas in the Program and must be preserved to the maximum extent possible. However, in the absence of a development proposal, existing lawfully established lawns, gardens and other landscaping will be allowed to be maintained.

The Program allows certain uses and activities within vegetation conservation areas that would otherwise not be allowed by the City's critical areas regulations. These uses include SMA-preferred water-oriented uses. A complete list of uses allowed within critical area buffers is provided in the Program (Chapter 5).

Public Access

The Guidelines state that the Program should provide standards for the dedication and improvement of public access. The Program requires that public access shall be evaluated for all shoreline permits; provided that certain uses such as agriculture, dredging and single-family development of four or fewer lots will not be required to provide public access to the shoreline.

Public access must consist of a dedication of land, physical improvement such as a walkway or deck, or other area serving as a means of view of public waters. Parcels within shoreline jurisdiction and do not front on a lake or other shoreline will not be required to provide shoreline public access. Public access maintenance and design standards are also set forth.

Shoreline Modifications – Chapter 6

The Program includes provisions that distinguish between shoreline uses and shoreline modifications. Shoreline modifications are generally related to construction of a physical element such as a dike, breakwater, dredged basin or fill. Shoreline modifications are usually related to another shoreline use such as dredging to allow a marina.

The Program addresses the following shoreline modifications: stabilization measures (e.g. bioengineering, bulkheads, dikes), piers and docks, fill and stair towers. Table 3.16 describes where each type of modification is allowed by shoreline environment.

General Principles for Shoreline Modifications

- Allow structural modifications only where necessary to support or protect a permitted structure or use from damage or for mitigation or enhancement purposes.
- Limit the quantity and extent of shoreline modifications; shoreline modifications must be appropriate to shoreline conditions.
- Assure that shoreline modifications do not result in net loss of ecological functions, both individually and cumulatively. This is accomplished by giving preference to modifications that have less of an impact on ecological functions and required mitigation.
- Provisions must be based on scientific and technical information.
- Avoid/reduce significant ecological impacts according to mitigation sequencing.

Shoreline Uses – Chapter 7

Programs must establish a system of use regulations that give preference to those uses that prevent damage to the natural environment, prevent pollution, or are water-dependent uses. The use regulations must address several principles:

- Protect public health, safety and welfare;
- Protect the land, vegetation and wildlife;
- Protect property rights;
- Reduce conflicts between uses;
- Give preference first to water-oriented uses, then to water-related uses and water-enjoyment uses; and
- Establish use regulations that avoid net loss of shoreline ecological functions.

The Program must define the types of uses and development that require shoreline conditional use permits. These permits are typically required to address uses that are not classified in the Program or to impose conditions for uses or development that would otherwise be inconsistent with the Program. The Guidelines are very specific about the types of uses and development that require a conditional use permit:

- Uses and development that significantly alters or impairs the public's use of the water areas of the state.
- Uses and development that have a significant impact on shoreline ecological functions or shoreline resources depending on location, design and site conditions.
- Development in critical saltwater habitats (not applicable in Tumwater).

Programs are required to establish regulations for uses commonly occurring along the shoreline. These uses are listed in Table 3.14 of the Program. Policies and regulations for each of the uses begin are found in Chapter 7.

Nonconforming Uses – Chapter 8

Existing uses and structures that do not meet the standards of the Program are subject to the nonconforming provisions in Chapter 8. General standards in Section 8.1 apply to all shoreline areas except for those shorelines adjacent to the former brewery and the Old Brewhouse. Separate nonconforming provisions in Section 8.2 apply to these shorelines. The main difference is that the general standards do not allow nonconforming uses to be relocated unless the use conforms to all the provisions of the Program. The standards in Section 8.2, applicable to brewery shoreline areas, allow uses to be moved if it can be demonstrated by a qualified professional using Best Available Science that there is no net loss of ecological function of the riparian area or buffer. The standards in Section 8.2 are identical to the standards in the City's existing regulations for nonconforming uses in Chapter 16.32 TMC (Fish and Wildlife Habitat Protection), and are intended to allow some flexibility for the future redevelopment/reuse of the brewery properties.

Section 8.1 contains two options that the Planning Commission is considering regarding how to regulate the rebuilding of nonconforming structures destroyed by fire or other natural event by more than 50% of the replacement cost. Option 1 allows residential structures to be rebuilt to their original dimensions, location and height, even if the structures are located within a required shoreline buffer area. Option 2 allows structures to be rebuilt only if the property owner requests approval of an administrative modification by the City. The administrative modification would be approved by City staff if the following criteria are met:

1. That the application of the development standards of this Program precludes reasonable use of the property;
2. That the applicant demonstrates that the project will result in no net loss to shoreline ecological functions and processes;
3. That the administrative modification is used only for purposes of restoration of the damaged structure and not for expansion that would otherwise be prohibited; and
4. That the public interest will suffer no detrimental effect.

Table of Regulations

Table 3.15 lists the standards for setbacks, buffers, building heights, impervious surfaces and residential densities for each shoreline environment. Critical area buffers apply to all shorelines regulated by this Program. Critical areas regulations impose buffer requirements that are established on a case-by-case basis and will require a plan prepared by a qualified professional. The Ordinary High Water Mark (OHWM) setbacks prescribed in Table 3.15 apply to water-oriented uses (i.e. water-dependent, water-related and water-enjoyment uses) that may be allowed within the critical area buffer. The purpose of the setback is to ensure that a separation exists between water-oriented uses and the shoreline.

Definitions – Chapter 9

Definitions come from a variety of sources, including the SMA, Guidelines, existing Program and the Tumwater Zoning Code. Several key definitions in the draft Program include the following:

Non-water-Oriented Uses. Those uses that are not water-dependent, water-related, or for water-enjoyment.

Ordinary High Water Mark (OHWM). The mark on all lakes, streams and tidal water which will be found by examining the bed and banks and ascertaining where the presence and action of waters are so common and usual, and so long continued in all ordinary years, as to mark upon the soil a character distinct from that of the abutting upland, in respect to vegetation as that condition exists on June 1, 1971, as it may naturally change thereafter, or as it may change thereafter in accordance with permits issued by the City or the Department.

Shared Use Path/Trail. A facility physically separated from motorized vehicular traffic to accommodate pedestrians, bicyclists and other non-motorized vehicles. Such trails may be used for commuting and recreational purposes and may connect neighborhoods and other destinations.

Shoreline Modifications. Those actions that modify the physical configuration or qualities of the shoreline area, usually through the construction of a physical element such as a dike, breakwater, pier, weir, dredged basin, fill, bulkhead or other shoreline structure. They can include other actions such as clearing, grading or application of chemicals.

Substantial Development. Any development of which the total cost or fair market value exceeds five thousand seven hundred eighteen dollars (\$5,718), or any development which materially interferes with the normal public use of the water or shorelines of the state. The dollar threshold established in this subsection must be adjusted for inflation by the office of financial management every five (5) years, beginning July 1, 2007, based upon changes in the consumer price index during that time period. "Consumer price index" means, for any calendar year, that year's annual average consumer price index, Seattle, Washington area, for urban wage earners and clerical workers, all items, compiled by the bureau of labor and

statistics, United States department of labor. The office of financial management must calculate the new dollar threshold and transmit it to the office of the code reviser for publication in the Washington State Register at least one (1) month before the new dollar threshold is to take effect.

Water-dependent Use. A use or portion of a use which cannot exist in a location that is not adjacent to the water and which is dependent on the water by reason of the intrinsic nature of its operations.

Water-dependent uses include, but are not limited to:

- a. Aquaculture;
- b. Boat launch facilities;
- c. Ferry terminals;
- d. Hydroelectric power plants;
- e. Marinas;
- f. Marine construction, dismantling and repair;
- g. Marine and limnological research and education;
- h. Private and public docks for moorage;
- i. Piers facilitating public access to shorelines of the State;
- j. Terminal and transfer facilities for marine commerce and industry;
- k. Water intakes and outfalls;
- l. Log booming; and
- m. Tug and barge facilities.

Water-enjoyment Use. A recreational use or other use that facilitates public access to the shoreline as a primary characteristic of the use; or a use that provides for recreational use or aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the use and which through location, design and operation ensures the public's ability to enjoy the physical and aesthetic qualities of the shoreline. In order to qualify as a water-enjoyment use, the use must be open to the general public, and the shoreline-oriented space within the project must be devoted to the specific aspects of the use that fosters shoreline enjoyment.

Water-enjoyment uses include, but are not limited to:

- a. Aquarium, with direct water intake;
- b. Restaurants;
- c. Public golf courses and clubhouses;
- d. Museums;
- e. Shared use paths/trails;

- f. Boardwalks; and
- g. Viewing towers.

Water-related Use. A use or portion of a use which is not intrinsically dependent on a waterfront location but whose economic viability is dependent upon a waterfront location because:

- a. The use has a functional requirement for a waterfront location such as the arrival or shipment of materials by water or the need for large quantities of water; or
- b. The use provides a necessary service supportive of the water-dependent uses, and the proximity of the use to its customers makes its services less expensive and/or more convenient.

Water-related uses include, but are not limited to:

- i. Warehousing or storage facilities;
- ii. Support services for fish hatcheries;
- iii. Seafood processing plants;
- iv. Wood products manufacturing;
- v. Log storage;
- vi. Watercraft sales; and
- vii. Boating supplies.

Water-oriented Use. A use that is water-dependent, water-related, or water-enjoyment, or a combination of such uses

Next Steps for the Program Update:

Summer – Fall 2011

- Planning Commission Review
 - Public Open House
 - Public Hearing
 - Recommendation to City Council

- City Council Review
 - Public Hearing
 - Submit to Ecology for review and approval
 - Council approval